



Our Local Plan

**Tandridge District Council – Local Plan 2033: Sustainability Appraisal
Incorporating Strategic Environmental Assessment
Volume 2: Options Assessments**
January 2019 Local Plan Submission

Tandridge
District Council

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5: OPTIONS, ASSESSMENTS & APPRAISALS

5.1 Summary of Earlier SA Assessments for the Local Plan 2033

5.1.1 Timeline of SA Assessments

The SA should be viewed as an iterative process that has evolved in stages as the Local Plan itself has evolved. The following sections set out how each stage of plan-making was assessed in the respective SA document, in relation to impacts on the Sustainability Objectives in the short, medium and long term.

5.1.2 Sustainability Appraisal 2015 (Issues and Approaches) Regulation 18

The SA of the Local Plan Vision

The vision will be delivered by the Objectives and provides a look into the future as to what the people and place of Tandridge will be like. A range of words were discussed at the Local Plan Steering Group (LPSG) on 25 September 2015 and turned into the vision that is set out below, this was subsequently taken back to LPSG on 15 October 2015 for members to agree.

A vision for the people and place of Tandridge District

The people of Tandridge will enjoy a high quality of life in a friendly and caring community. Homes, jobs and leisure facilities will be available, accessible and offer security and comfort to a mixture of people in terms of age, household and culture.

Our District will be a place with green and open spaces to support the health and wellbeing of the community.

Our successful towns and local centres will be accessible and provide for the needs of residents, businesses and visitors. Places of work and the economy will be prosperous and vibrant.

On recognition of our work with partners, the road network will be improved and the use of sustainable public transport encouraged lessening congestion. Design will have played a key role in ensuring the District remains pleasant, safe and secure, making the most of historic assets and regenerating areas for the benefit of all.

Sustainability Appraisal Objectives 

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
short	+	++	+	0	0	+	+	0	0	0	0	0	0	0	+	0
medium	+	++	+	0	0	+	+	0	0	0	0	0	0	0	+	0
long	+	++	+	0	0	+	+	0	0	0	0	0	0	0	+	0

The vision seeks to enhance the quality of life for individuals and communities, therefore, produces a positive effect across a range of SA objectives.

Sustainability could be improved further if reference to a number of the other Sustainability Objectives was made, such as reducing flood risk, adapting to the changing climate, and to conserve and enhance biodiversity.

The SA of the Local Plan Objectives

The Local Plan – Issues and Approaches (Regulation 18) document sets out a number of objectives which outlined the measures the council will encourage to help achieve the strategic vision for the district. The objectives are listed below and the appraisal of the objectives can be found below that.

Local Plan Objectives

Economy and Tourism	
1	Offer choice to provide employment and economic opportunities.
2	Support and retain businesses, whilst encouraging diversification.
3	Provide an opportunity for people to have skills necessary to stay within the district and reduce the amount of out-commuting.
4	Support the development of tourism without damaging the quality of life for local residents.
Housing	
5	Balance the supply of homes for mixed communities, which would provide both affordable units and opportunities to downsize.
6	Recognise and respond to the accommodation needs of the traveller community.
Town Centres / Retail and Leisure	
7	Support our town centres to be vital and viable through encouraging wider diverse retail and leisure opportunities as well as regeneration.
Health and Wellbeing	
8	Assist in improving health and wellbeing through designing places and spaces that give positive experiences with access to appropriate facilities and services.
Design and Safety / Climate Change	
9	Promote development that is accessible and safe, limiting the opportunity for crime.
10	Continue to support high quality design and consider higher densities where appropriate.
11	Mitigating and adapting to the impacts of climate change where possible.
Natural Environment / Heritage	
12	Maintain and enhance our mixed and diverse natural and historic environment, mitigating and discouraging negative use.
Flooding	
13	Ensure that any areas prone to flooding are suitably responded to and minimised where possible, and that development minimises and mitigates flood risk in the district, incorporating Sustainable Urban Drainage Systems (SUDS) where possible.
Infrastructure	
14	Support and encourage the use of sustainable modes of transport; considering the economic impact this may have on the district.
15	Work with partners and service providers to maximise funding that will assist in the delivery and improve accessibility of infrastructure, services and facilities necessary for the district.

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
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Plan Objective

1	-/?	+	n/a	++	+	++	++	+	0	+	0	0	0	+	0	0
2	-/?	+	n/a	++	++	++	++	+	0	+	0	0	0	+	0	0
3	0	+	n/a	++	n/a	++	++	+	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a
4	-/?	+	++	0	0	+	+	0	0	0	n/a	n/a	n/a	n/a	+	+
5	+	+	n/a	0	0	0	+	0	0	0	0	0	0	0	0	0
6	+	+	n/a	0	0	0	0	0	0	0	0	0	0	0	0	0
7	0	+	+	+	++	+	+	+	+	0	0	0	0	0	0	+
8	+	++	+	++	0	+	+	+	0	0	0	0	0	0	0	0
9	+	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10	++	+	+	0	++	0	0	0	0	0	0	0	0	+	0	0
11	0	+	0	+	0	0	0	++	+	++	++	+	0	+	0	+
12	0	+	++	0	+	0	0	0	0	0	0	0	0	0	+	+
13	0	+	0	0	0	0	0	0	0	++	++	+	0	0	0	+
14	0	+	0	++	0	+	+	+	+	0	0	0	0	+	0	0
15	0	+	0	++	0	+	+	+	+	0	0	0	0	0	0	0

Economy and Tourism (Plan objectives 1, 2, 3 and 4)

These objectives aim to support the local economy and reduce the amount of out-commuting to work from the district. The reduction in commuting and enabling people to live closer to where they work will show many benefits, including improved wellbeing for the population and a reduction in greenhouse gasses. A potential conflict has been identified against SA objective 1 (to provide sufficient housing) as currently a proportion of the housing supply within the District is provided on employment sites. Therefore, a more stringent approach to the protection of employment sites may reduce the supply of housing. This potential impact on housing supply can be avoided by ensuring that the Local Plan will deliver a sufficient supply of housing on alternative sites. Specific reference to our rural economy and flexible working patterns could enhance the Plan objectives.

Housing (Plan objectives 5 and 6)

These objectives focus primarily on the mix, affordability and type of housing to meet different needs. Objective five could be strengthened to recognise the need to provide a sufficient supply of housing as identified in the Strategic Housing Market Assessment. Further sustainability benefits could be achieved by recognising the importance of sustainable locations for development.

Town Centres / Retail and Leisure (Plan objective 7)

This objective recognises the need to maintain and enhance the role of the two town centres within the District, however, the objective should also recognise the importance of the other centres which provide the day-to-day needs for their communities. Whilst the objective encourages leisure opportunities within the town centres it should also note the importance of providing these facilities across the district so that they are accessible to all. The Tandridge District Open Space and Outdoor Recreation Study identifies the importance of providing leisure facilities within walking distance, therefore the plan objective should be expanded to ensure that leisure facilities are protected and provided where necessary across the district to meet the needs of the community and that are accessible to all.

Health and Wellbeing (Plan objective 8)

Overall, this objective produces a positive impact across a range of the SA objectives.

Design and Safety/Climate Change (Plan objectives 9, 10 and 11)

The two design objectives, 9 and 10 score positively against the SA objectives, however, there could be more of a focus on promoting accessible, inclusive environments that can be used by everyone regardless of age, gender or disability. The climate change objective scores very well against the SA objectives.

Natural Environment/Heritage (Plan objective 12)

This objective scores well against the SA framework as it aims to protect and enhance both the historic and natural environment.

Flooding (Plan objective 13)

This objective focuses on the protection of people and their property from all sources of flooding and scores positively against the SA objectives.

Infrastructure (Plan objective 14 and 15)

These objectives recognise the importance of infrastructure provision and as such provide positive effects against the majority of the SA objectives.

Objectives Appraisal Summary

Overall, the objectives provide a strong framework to support and encourage sustainable development in Tandridge. However, recommendations are included which would further improve the sustainability of the plan's objectives.

Delivery Strategy Approaches

The Council identified 7 approaches to the delivery strategy, however, one of these was not considered to be a reasonable alternative. The 6 approaches that were assessed are set out below, all of which provide a different number of homes and jobs and not all approaches meet the objectively assessed housing needs of 9,400 dwellings across the 20 year plan period (2013-2033) as set out in the Objectively Assessed Needs Paper (2015) and the employment need as set out in the Economic Needs Assessment (2015).

SA Table 1 below presents appraisal findings in relation to the six strategic options.

SA Table 1: Delivery Strategy Approaches Appraisals

Sustainability Appraisal Objective →

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
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Approach 2a: Residential: Approach 1 + sites within the inset areas in the district (Oxted, Limpsfield, Hurst Green, Caterham on the Hill, Caterham Valley, Warlingham, Whyteleafe, Smallfield, Lingfield and Woldingham). This could deliver 2,336 dwellings.

Commercial: Intensification of existing employment sites within the inset areas. This could deliver 3.2 hectares of employment.

short	-	0	0	0	+	-	-	0	+	0	-	0	+	-	+	0/?
medium	--	0	0	0	+	-	-	0	+	0	-	0	+	-	+	0/?
long	--	0/?	-/?	0	+	-	--	0	+	0	-	0	+	-	+	0/?

Approach 2b: Residential: Approach 1 + sites within the existing inset areas in the district built at a higher density (at least 70dph). This could deliver 3,403 dwellings.

Commercial: Intensification of existing employment sites within the inset areas. This could deliver 3.2 hectares of employment

short	-	0	0	0	++	-	-	0	+	0	-	0	++	--	++	0/?
medium	-	0	0	0	++	-	-	0	+	0	--	0	++	--	++	0/?
long	--	0/?	-/?	0	++	-	--	0	+	-	--	0	++	--	++	0/?

Approach 3: Residential: Approach 1 + Approach 2a + sites that are currently in the Green Belt around the main urban settlements and semi-rural service settlements (Oxted, Limpsfield, Hurst Green, Caterham on the Hill, Caterham Valley, Warlingham, Whyteleafe, Smallfield, Lingfield and Godstone). This could deliver 8,569 dwellings.

Commercial: Intensification of all employment sites within the district. This could deliver 87.4 hectares of employment.

short	0	+	0	+	-	+	+	+	0	0	0	0	-	-	-	-
medium	+	+	0	+	-	+	+	+	0	0	0	0	-	-	-	-
long	+	+	0	+	-	+	+	+	0	0	0	0	-	-	-	-

Approach 4: Residential: Approach 1 + Approach 2a + sites that are currently in the Green Belt around the rural settlements (Bletchingley, Woldingham, South Nutfield, Dormansland, South Godstone, Tatsfield, Blindley Heath, Felbridge and Old Oxted). This could deliver 3,895 dwellings.

Commercial: Intensification of all employment sites within the district. This could deliver 87.4 hectares of employment.

short	-	0	0	--	-	0	0	-	0	0	0	0	-	--	-	-
medium	-	0	0	--	-	0	0	-	0	0	0	0	-	--	-	-
long	--	0/?	0	--	-	0	0	-	0	0	0	0	-	--	-	-

Approach 5: Residential: Approach 1 + Approach 2a + Approach 3 + Approach 4 (this scenario is based on maximum capacity). This could deliver 10,128 dwellings and 87.4 hectares of employment.

Commercial: Intensification of all employment sites within the district. This could deliver 87.4 hectares of employment.

short	0	+	0	+	-	+	+	0	0	0	0	0	-	-	--	-
medium	++	+	0	+	-	+	+	0	0	0	0	0	-	-	--	-

long	++	+	0	+	-	+	+	0	0	0	0	0	-	-	--	-
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Approach 6: A large urban extension or new settlement The amount of homes and employment space to be provided in this approach are to be determined as the plan progresses. This approach is known as a 'broad location' in the NPPF.

short	-	-	0	+	-	+	+	+	0	0	0	0	-	0/?	-	-
medium	0	0	0	+	-	+	+	+	0	0	0	0	-	0/?	-	-
long	++	++	0	+	-	+	+	+	0	0	0	0	-	0/?	-	-

Approach 2a	Residential: Approach 1 + sites within the inset areas in the district (Oxted, Limpsfield, Hurst Green, Caterham on the Hill, Caterham Valley, Warlingham, Whyteleafe, Smallfield, Lingfield and Woldingham). Commercial: Intensification of existing employment sites within the inset areas.	Approaches 3 and 5 perform well in terms of providing sufficient housing to enable people to live in a home suitable to their needs, however, this level of development does mean that they score relatively poorly against a number of the other sustainability objectives. There are mitigation measures that can be implemented to reduce these impacts and if either of these approaches is taken forward as the preferred approach the site selection process will need to assess, both, their individual impact and the cumulative impact. Compared to the objectively assessed housing need number, approach 4 will deliver a relatively low number of dwellings so scores poorly against the provision of housing and due to the rural nature of the sites it has also scores poorly against other key sustainability objectives such as reducing the need to travel, improving noise and light pollution, enhancing the landscape character and enhancing biodiversity. Approach 6 will see the delivery of a large scale development and while it is considered that this will take a number of years to deliver it could provide a significant level of housing in the long term. Due to scales of economy such a development has the potential to make some significant financial contributions to deliver the required level of infrastructure and mitigate against the negative impacts of the development. If this approach is selected as the preferred option a large number of locations will need to be considered and thoroughly assessed to ensure that the most appropriate location is selected. Although approaches 2a and 2b have scored very poorly against the SA objectives; provision of sufficient housing and growth of the economy, they have scored well against many of the other objectives as the approaches will seek to protect the environment around the existing built up areas.
Approach 2b	Residential: Approach 1 + sites within the existing inset areas in the district built at a higher density (70dph). Commercial: Intensification of existing employment sites within the inset areas.	
Approach 3	Residential: Approach 1 + Approach 2a + sites that are currently in the Green Belt around the main urban settlements and semi-rural service settlements (Oxted, Limpsfield, Hurst Green, Caterham on the Hill, Caterham Valley, Warlingham, Whyteleafe, Smallfield, Lingfield and Godstone). Commercial: Intensification of all employment sites within the district.	
Approach 4	Residential: Approach 1 + Approach 2a + sites that are currently in the Green Belt around the rural settlements (Bletchingley, Woldingham, South Nutfield, Dormansland, South Godstone, Tatsfield, Blindley Heath, Felbridge and Old Oxted). Commercial: Intensification of all employment sites within the district.	
Approach 5	Residential: Approach 1 + Approach 2a + Approach 3 + Approach 4 (this scenario is based on maximum capacity). Commercial: Intensification of all employment sites within the district.	
Approach 6	A large urban extension or new settlement. The amount of homes and employment space to be provided in this approach are to be determined as the plan progresses. This approach is known as a 'broad location' in the NPPF.	

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

It is anticipated that the potential level of development for approaches 2a, 2b and 4 will fall significantly below the district's objectively assessed housing need as identified within the Strategic Housing Market Assessment. It is expected that the need for housing within the district will get worse over time as an under delivery of housing in the initial years of the plan will exacerbate pressure in the future, this will be made worse as the amount of land within the urban areas is a finite resource; resulting in a **significant negative effect** in terms of the provision of housing.

Due to the number of houses that approaches 3 and 5 would deliver they are likely to have significant positive effects in terms of helping the district to meet objectively assessed housing needs.

Approaches 4 and 5 will increase the supply of housing around the smaller rural settlements within the District which will provide an important opportunity for different types of housing to meet specific sectors of the community in places where development will not have previously been supported. The delivery of these sites may have a **significant positive effect** benefit in terms of helping to provide access to all types of housing within rural areas that will help meet needs.

Approach 6 will plan for a large scale settlement and while it will deliver a significant amount of housing there are often longer lead-in times which means that this approach has not scored well in the short term.

The policy does not specifically refer to types of housing or to the proportion of affordable housing to be achieved as these requirements will be covered elsewhere in the Plan. However, a greater amount of affordable housing may be possible under approaches 3 and 5 given that these approaches would be likely to deliver major development sites and approach 6 may be able to achieve an even higher level of affordable housing. Larger developments tend to have positive implications for development viability, hence the potential to fund affordable housing provision. Approaches 2a and 2b have limited scope to deliver additional affordable housing in the future as many of the sites will be small in nature.

SA objective 2: To facilitate the improved health and wellbeing of the whole population.

It is expected that approaches 1 and 2 will maintain existing levels, however there are concerns that in the long term the cumulative impact of small scale development across the urban areas will increase the pressure on services and facilities that will have a detrimental impact on the health and well-being of the population.

Due to the positive consequences of developing larger sites on viability, approaches 3 to 6 will have the ability to deliver additional services and facilities. The delivery of development on large sites has the potential to generate significant planning obligations that will provide additional community amenities, health facilities and natural greenspace that will all have a positive impact on the health and well-being of the population.

The Community Infrastructure Levy (CIL) allows the council to raise funds from developers undertaking new development projects within the district to fund a wide range of infrastructure that is needed as a result of the development. The Council adopted its CIL charging schedule in December 2014 and it is recommended that this approach to funding infrastructure is continued. The charging schedule may need to be reviewed to take account of the level of development within the emerging Local Plan.

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

As approaches 2a and 2b focus all the development into the urban areas there is concern that it may have a detrimental impact on the setting of nearby heritage assets, however, at this stage it is not possible to conclude that these approaches will have a negative impact in the long term. Approaches 3 to 6 will have less impact on the setting of historic assets and when it comes to site selection it should be possible to avoid locating development in areas where it would impact on archaeological, historic and cultural assets and there may be the opportunity to protect and enhance these assets.

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

Approaches 2a and 2b continue to focus development into the existing urban areas which benefit from accessible and regular public transport services. If approaches 3 and 6 are progressed there is the opportunity to select sites that have good public transport links.

Approaches 4 and 5 will deliver development in a number of rural settlements that are less well served by accessible and regular public transport services and therefore there is a potential minor negative effect.

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

Approaches 2a and 2b score particularly well against this objective as development will be contained within the extent of the settlements making the best use of previously developed land. While the other Approaches will also deliver housing within the envelope of the settlements they will also provide a significant amount of housing on greenfield land, for this reason they have not scored so well.

SA objective 6: To support economic growth which is inclusive, innovative and sustainable.

Approaches 2a and 2b will put significant pressure on existing employment sites as the need for housing increases over time. This will be made even worse by the Governments recent changes to the permitted development order that allows for some types of commercial premises to be converted to homes. The Council has already seen a significant proportion of its office floor space being converted to homes and it is expected that this will continue in the future.

The other approaches are in line with the finding of the Economic Needs Assessment as they seek to protect existing employment sites across the whole of the District and allow for intensification to meet the demands of an increased labour force. However, there is no disparity between this part of the policy for all the different approaches even though they are all proposing to deliver different amounts of housing. When the approach is chosen more work needs to be carried out to ensure that there is a balance between the number of houses and the number of jobs being delivered.

SA objective 7: To provide for employment opportunities to meet the needs of the local economy.

This has achieved a similar score to objective 6 as there are concerns that only allowing for development to take place on previously developed sites for approaches 2a and 2b will increase the pressure to release employment land for housing.

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

The approaches (2a, 2b, 3 and 6) that support good access to sustainable transport are considered to perform best in terms of climate change mitigation. Approach 3 performs best as the sites are located near to the existing public transport network, services and infrastructure, however, approach 6 also performs well as a new settlement can be located near to an existing train station and then also provide the necessary services and infrastructure that will help reduce reliance on private motor vehicles.

Matters relating to renewable / low carbon energy generation are also relevant. Larger development sites are more likely to provide biomass fuelled heating systems or Combined Heat and Power (CHP) systems. If it is assumed that concentrating development around the existing urban areas would lead to larger sites being delivered then approach 3 and approach 6 would all lead to positive effects in terms of climate change mitigation. The development pattern promoted by approach 4 is less likely to enable ambitious measures as the sites will be smaller in these rural locations.

SA objective 9: To use natural resources prudently.

Approaches 2a and 2b will mean that there is scope for the reuse of existing materials on site in the construction of the new development. To increase the prudent use of materials on green field sites it is recommended that this should be mentioned in the relevant policy to encourage the use and supply of sustainable products and reduce the use of primary resources.

With regard to post completion the broad spatial distribution of growth is not likely to have a significant bearing on waste management related objectives. It is assumed that there is sufficient capacity at waste management processing facilities to handle waste under any approach. All new development, regardless of location and scale, would likely design-in some waste management facilities.

SA objective 10: To adapt to the changing climate.

As the policies progress it is mainly design issues that can be developed to help to protect the community from the increased extremes of weather, however, the higher densities within approach 2b could exacerbate the impacts of a heat wave. It should be noted that flooding is dealt with separately in the next SA objective.

It is not possible to conclude significant effects (given that climate change mitigation is a global issue and the influence of the growth strategy promoted through the Local Plan will be minor).

SA objective 11: To reduce flood risk.

The Strategic Flood Risk Assessment (SFRA) identifies the areas prone to flood risk within the District. The assessment shows that there are areas at risk, however, the Housing and Economic Land Availability Assessment (HELAA) shows that there is sufficient land outside of the flood zones to accommodate the housing. Once the housing approach has been chosen it is then necessary to carry out a flood risk assessment of each site to ensure that flooding is addressed.

Development in any area has the potential to increase surface water runoff rates which could increase surface water flood risk. Approaches 2a and 2b have received a lower score than the others because it is considered that the majority of housing being built on previously developed land will fall under the threshold requiring the installation of a sustainable drainage systems (SuDS). The larger sites associated with the other approaches have the potential to mitigate the effects through the incorporation of a SuDS.

With the climate changing there is an increasing threat of flooding within the district, it is therefore important that the next of the stage of the SFRA carries out a thorough assessment of flood risk to any future development site.

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

Through consultation with waste water treatment companies no waste water capacity issues have been identified, however, in the past concerns have been raised with the capacity of the Caterham outfall sewer. Currently there are no restrictions on waste water treatment capacity that will affect any of the strategic growth approaches.

In terms of water efficiency, larger scale developments may enable higher standards of water efficiency; however, this is uncertain.

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

Approaches 2a and 2b score particularly well as these would maximise the use of previously developed land. As the other approaches involve the development of green field sites this would lead to a negative effect.

There are no sites located in mineral safeguarding areas so that there is no risk of development sterilising the mineral resource. The majority of land in the district is of Grade 3 (good to moderate), with a small amount of higher quality land, none of the sites fall within the higher quality designation.

The potential for land contamination has also not been determined at this time, and it is fair to assume that any contaminated sites would be remediated prior to development and adverse effects would be avoided.

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

Air quality in Tandridge District is generally considered to be good, however, there are some areas that are closely monitored and further development could have a detrimental impact. While approaches 2a and 2b will focus development to areas with existing public transport infrastructure there are concerns that additional development within the built up areas could cause localised problems, particularly if the density of development is increased.

Approach 3 focuses development around existing settlements to provide easy access to existing services and facilities, however approaches 4 and 5 will deliver housing in more rural locations that is likely to increase the need to travel and dependency on the car for households to access employment and community infrastructure; resulting in **significant negative effects** in terms of air quality. It is not yet determined where approach 6 will deliver the new settlement, however, it is very important to choose a location that does not lead to a vehicle orientated community as this could lead to **significant negative effects**.

Although noise and light pollution have not been identified as an issue within Tandridge as a whole there are areas with localised issues and the selection of sites to deliver the approaches will need to consider the impact of the motorways and Gatwick airport on future development.

It is not possible to conclude significant positive effects on the basis that growth could still result in an increase in car travel locally (and possibly traffic congestion to some extent) and future development has the potential to increase light and noise pollution. Essentially, the conclusion of this appraisal is that the assessment of which sites are required to deliver the preferred approach needs to ensure that they support 'sustainable' patterns of travel and avoid areas that are subjected to noise pollution.

SA objective 15: To protect and enhance landscape character.

Approaches 2a and 2b will focus development into the urban area, therefore protecting the surrounding landscape; however, when the sites are selected it is just as important to protect Tandridge Districts important natural urban greenspace.

The other approaches will deliver housing outside of the urban areas on green field land and will therefore have a negative impact on the surrounding landscape, it is therefore essential that the selection of sites carefully considers the impact that the development will have on the surrounding landscape.

SA objective 16: To conserve and enhance biodiversity.

Approaches 2a and 2b have a neutral score with a question mark as some brownfield sites can be incredibly important for wildlife so further work will be needed to ensure that the redevelopment of the site does not have a detrimental impact on the biodiversity.

The sites required to deliver the other approaches will involve the development of greenfield land, this could have a detrimental impact on the sites biodiversity, therefore it is essential that the site selection will avoid development in sensitive locations.

At this stage significant negative effects are considered unlikely, but impacts to biodiversity could warrant further investigation if development near to sensitive locations is pursued.

Delivery Strategy Approaches Appraisal Summary

Approaches 3 and 5 perform well in terms of providing sufficient housing to enable people to live in a home suitable to their needs, however, this level of development does mean that they score relatively poorly against a number of the other sustainability objectives. There are mitigation measures that can be implemented to reduce these impacts and if either of these approaches is taken forward as the preferred approach the site selection process will need to assess, both, their individual impact and the cumulative impact.

Compared to the objectively assessed housing need number, approach 4 will deliver a relatively low number of dwellings so scores poorly against the provision of housing and due to the rural nature of the sites it has also scores poorly against other key sustainability objectives such as reducing the need to travel, improving noise and light pollution, enhancing the landscape character and enhancing biodiversity.

Approach 6 will see the delivery of a large scale development and while it is considered that this will take a number of years to deliver it could provide a significant level of housing in the long term. Due to scales of economy such a development has the potential to make some significant financial contributions to deliver the required level of infrastructure and mitigate against the negative impacts

of the development. If this approach is selected as the preferred approach a large number of locations will need to be considered and thoroughly assessed to ensure that the most appropriate location is selected.

Although approaches 2a and 2b have scored very poorly against the SA objectives; provision of sufficient housing and growth of the economy, they have scored well against many of the other objectives as the approaches will seek to protect the environment around the existing built up areas.

Policy Approaches

Economic and Tourism Policy Approaches

The Council identified 4 approaches for a policy relating to Economic Development and Tourism. The approaches can be found below, where the approaches have been appraised against the Sustainability Framework.

Sustainability Appraisal Objective →

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
--	---	---	---	---	---	---	---	---	---	----	----	----	----	----	----	----

A. Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance

short	0	+/?	N/A	+	+	+	+	0	N/A	N/A	N/A	+	+	?	0	+
medium	0	+/?	N/A	+	+	+	+	0	N/A	N/A	N/A	+	+	?	0	+
long	0	+/?	N/A	+	+	+	+	0	N/A	N/A	N/A	+	+	?	0	+

B. Retain Core Strategy Policy 22 – The Economy

short	+	0	N/A	+	+	0	0	0	N/A	N/A	N/A	+	+	?	0	+
medium	+	0	N/A	+	+	0	0	0	N/A	N/A	N/A	+	+	?	0	+
long	+	0	N/A	+	+	0	0	0	N/A	N/A	N/A	+	+	?	0	+

C. Identify and protect key employment sites and intensify existing sites within the district. This would consider implementing Article 4 Directions to remove permitted development rights and adding conditions to planning permissions to restrict the use of permitted development rights, where this can be justified.

short	0	+	N/A	+	0	++	++	+	N/A	N/A	N/A	0	0	?	0	+
medium	0	+	N/A	+	0	++	++	+	N/A	N/A	N/A	0	0	?	0	+
long	0	+	N/A	+	0	++	++	+	N/A	N/A	N/A	0	0	?	0	+

D. Include a policy to support the development of tourism in the district.

short	-/?	+	+	0	0	+	+	0	N/A	N/A	N/A	N/A	N/A	?	0	0
medium	-/?	+	+	0	0	+	+	0	N/A	N/A	N/A	N/A	N/A	?	0	0
long	-/?	+	+	0	0	+	+	0	N/A	N/A	N/A	N/A	N/A	?	0	0

A.	Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance	Approaches A and B will allow for the conversion of buildings to alternative uses, allowing them to make the best use of previously developed land, however, without control of their release many employment uses will be lost to residential development. Approach C scores particularly well against SA objectives 6 and 7 as it will provide the Council with the necessary tools to protect the strategic employment sites, therefore supporting local jobs, the economy and help to reduce commuting distances. It is not considered that approach D alone could sufficiently cover this topic area; therefore, it will need to be used in conjunction with, A, B, or C.
B.	Retain Core Strategy Policy 22 – The Economy	
C.	Identify and protect key employment sites and intensify existing sites within the district. This would consider implementing Article 4 Directions to remove permitted development rights and adding conditions to planning permissions to restrict the use of permitted development rights, where this can be justified.	
D.	Include a policy to support the development of tourism in the district.	

A. Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance

The NPPF shows that the Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. While the NPPF aims to secure economic growth in order to create jobs and prosperity the recent changes to the permitted development order, allowing the conversion of commercial to residential, has had a significant impact on the stock of employment floorspace within the district.

This approach scores well against the SA objectives, however there are concerns that this approach will not offer protection against the recent changes to the permitted development order which has seen a decline in available commercial property as it is being converted to residential.

As the policy allows for the conversion of commercial premises it may give the opportunity to remediate contaminated land, increase biodiversity and reduce any noise and light pollution.

B. Retain Core Strategy Policy 22 – The Economy

This approach aims to develop a sustainable economy by making the best use of existing sites but does allow allows for the use of redundant or unsuitably located sites for housing. As above, there are concerns that that the conversion of commercial premises to residential has and will continue to have a significant impact on the stock of employment floor space.

C. Identify and protect key employment sites and intensify existing sites within the district. This would consider implementing Article 4 Directions to remove permitted development rights and adding conditions to planning permissions to restrict the use of permitted development rights, where this can be justified.

This approach will enable the Council to suspend permitted development rights. The withdrawal of development rights does not necessarily mean that planning consent would not be granted. It merely means that an application has to be submitted, so that the planning authority can examine the plans in detail, therefore it will give the Council the opportunity to consider the loss of employment sites. Since the permitted development changes the Council has received applications (and many of these have been implemented) for the conversion of 11% of the office stock within Tandridge to residential development.

D. Include a policy to support the development of tourism in the district.

Increased tourism could lead to a growth in second homes and houses being used for holiday lets which could reduce the availability of homes. The promotion of tourist attractions within the District will contribute to the wellbeing of the population.

Economic and Tourism Approaches Appraisal Summary

Approaches A and B will allow for the conversion of buildings to alternative uses, allowing them to make the best use of previously developed land. However, without control of their release many employment uses will be lost to residential development. Approach C scores particularly well against SA objectives 6 and 7 as it will provide the Council with the necessary tools to protect the strategic employment sites, therefore supporting local jobs, the economy and help to reduce commuting distances.

It is not considered that approach D alone could sufficiently cover this topic area, therefore, it will need to be used in conjunction with, A, B, or C.

Town Centres/Retail and Leisure Policy Approaches

The Council identified 3 approaches relating to town centres/retail and leisure that it considered for a policy in the Local Plan. The approaches can be found below, where they have been appraised against the Sustainability Framework.

Sustainability Appraisal Objective →

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
A. Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance																
short	0	+	0	-/?	+	-	-	-/?	0	N/A	N/A	N/A	N/A	0	N/A	N/A
medium	0	+	0	-/?	+	-	-	-/?	0	N/A	N/A	N/A	N/A	0	N/A	N/A
long	0	+	0	-/?	+	-	-	-/?	0	N/A	N/A	N/A	N/A	0	N/A	N/A
B. Retain Core Strategy Policy 23 - Town and other Centres																
short	0	+	0	+	+	+	+	+	0	N/A	N/A	N/A	N/A	0	N/A	N/A
medium	0	+	0	+	+	+	+	+	0	N/A	N/A	N/A	N/A	0	N/A	N/A
long	0	+	0	+	+	+	+	+	0	N/A	N/A	N/A	N/A	0	N/A	N/A
C. Amend Core Strategy Policy 23 - Town and other Centres, reflecting the recommendations of the Tandridge Retail and Leisure Study and incorporating the emerging Caterham Town Centre Masterplan into the policy.																
short	0	+	0	+	+	+	+	+	0	N/A	N/A	N/A	N/A	0	N/A	N/A
medium	+/?	+	0	+	+	++	++	+	0	N/A	N/A	N/A	N/A	0	N/A	N/A
long	+/?	+	0	+	+	++	++	+	0	N/A	N/A	N/A	N/A	0	N/A	N/A

A.	Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance	All the approaches seek to maintain the existing role of the centres and provide opportunities for new services and facilities, however approach A scores poorly against a number of the SA objectives, largely due to the lack of certainty that this option provides for investors.
B.	Retain Core Strategy Policy 23 -Town and other Centres	Approach B scores well against the SA objectives and C scores slightly better against some of the objectives as the possible adoption of the Caterham Town Centre Masterplan will help to create a vibrant sustainable place that will attract a number of different investors to deliver the plan.
C.	Amend Core Strategy Policy 23 -Town and other Centres, reflecting the recommendations of the Tandridge Retail and Leisure Study and incorporating the emerging Caterham Town Centre Masterplan into the policy.	It is recommended that whichever of the policies is taken forward it includes a requirement to improve public transport and accessibility for pedestrians and cyclists to help mitigate against the increased level of traffic generation.

A. Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance

There are concerns that this approach may lead to significant leisure and retail developments outside of the town centres as the NPPF only requires an impact assessment for developments over 2500m², this competition could have a detrimental impact on the existing businesses within the town centres.

While the NPPF supports town centres, this approach would not provide definition as to where the boundaries of town centres are located. In turn, this would mean that there is no certainty for investors as each application will be determined on its merits rather than against a clearly planned approach.

B. Retain Core Strategy Policy 23 - Town and other Centres

Whilst this policy would allow for the provision of a small amount of residential development on the former Rose & Young site and the Oxted gasholder this is the only residential development that it is promoting within the town centres.

This approach seeks to protect and enhance the role of the town centres, therefore it scores well against SA objectives such as reducing the need to travel, supporting sustainable economic growth and providing employment opportunities to meet the needs of the local economy.

C. Amend Core Strategy Policy 23 - Town and other Centres, reflecting the recommendations of the Tandridge Retail and Leisure Study and incorporating the emerging Caterham Town Centre Masterplan into the policy.

At the time of writing, the Caterham Town Centre Masterplan is in its infancy so it is not certain exactly how it will look to shape the area over the plan period. It is proposed that the Masterplan will look to achieve a better mix of residential and traditional town centre uses, therefore, this approach may deliver additional housing in the medium to long term.

This approach seeks to protect and enhance the role of the town centres, therefore it scores well against SA objectives such as reducing the need to travel, supporting sustainable economic growth and providing employment opportunities to meet the needs of the local economy.

Town Centres/Retail and Leisure Approaches Appraisal Summary

All the approaches seek to maintain the existing role of the centres and provide opportunities for new services and facilities, however approach A scores poorly against a number of the SA objectives, largely due to the lack of certainty that this approach provides.

Approach B scores well against the SA objectives and C scores slightly better against some of the objectives as the possible adoption of the Caterham Town Centre Masterplan will help to create a vibrant sustainable place that will attract a number of different investors to deliver the plan.

It is recommended that whichever of the policies is taken forward it includes a requirement to improve public transport and accessibility to the town centres for pedestrians and cyclists to help mitigate against the increased level of traffic generation.

Health and Wellbeing Policy Approaches

The Council identified 3 approaches for a policy relating to Health and Wellbeing. The approaches can be found below, where the approaches have been appraised against the Sustainability Framework.

Sustainability Appraisal Objective →

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
---	---	---	---	---	---	---	---	---	----	----	----	----	----	----	----

A. Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance.

short	N/A	+/?	0	+	N/A	N/A	0/?	+	0	0	+	N/A	+	0/?	+	+
medium	N/A	+/?	0	+	N/A	N/A	0/?	+	0	0	+	N/A	+	0/?	+	+
long	N/A	+/?	0	+	N/A	N/A	0/?	+	0	0	+	N/A	+	0/?	+	+

B. Retain Core Strategy Policy 13 – Community, Sport and Recreation Facilities and Services.

short	N/A	+	+	+	N/A	N/A	0/?	+	0	0	+	N/A	+	0/?	+	+
medium	N/A	+	+	+	N/A	N/A	0/?	+	0	0	+	N/A	+	0/?	+	+
long	N/A	+	+	+	N/A	N/A	0/?	+	0	0	+	N/A	+	0/?	+	+

C. To prepare a policy based on recommendations contained within the Open Space Assessment.

short	N/A	++	+	+	N/A	N/A	0/?	+	0	0	+	N/A	+	0/?	+	+
medium	N/A	++	+	+	N/A	N/A	0/?	+	0	0	+	N/A	+	0/?	+	+
long	N/A	++	+	+	N/A	N/A	0/?	+	0	0	+	N/A	+	0/?	+	+

A.	Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance	<p>Management of open space and woodlands will protect and enhance natural historic environments and the setting of the built historic environments. The provision of local open space will make it accessible to all and reduce the need to travel elsewhere, therefore decreasing the amount of greenhouse gas emissions released from car journeys. The provision of further open space may create additional jobs in the leisure sector. Open space will protect the landscape and biodiversity, there is also be the opportunity to create some dual use open space that will also offer some flood protection measures.</p> <p>All of the approaches will help to protect and where possible increase the amount of open space within the district, however, it is considered that the more prescriptive approach taken in C will add certainty and ensure that an adequate level of open space is provided across the district.</p>
B.	Retain Core Strategy Policy 13 – Community, Sport and Recreation Facilities and Services.	
C.	To prepare a policy based on recommendations contained within the Open Space Assessment.	

A. Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance

While the NPPF seeks to facilitate social interaction and creating healthy, inclusive communities there are no locally set requirements for the provision of open space across the district. Without clear standards it may be difficult for the Council to seek the provision of new facilities and protect the existing areas.

B. Retain Core Strategy Policy 13 – Community, Sport and Recreation Facilities and Services.

This approach scores well against a number of the SA objectives. However, there are concerns that the policy would not be sufficient if the Local Plan aims to deliver a large amount of new dwellings over the plan period. The policy also seeks the protection of community services and facilities, this may be addressed in the infrastructure section of the emerging local plan, but if not, it is important that the policy continues to do so.

C. To prepare a policy based on recommendations contained within the Open Space Assessment.

The provision of open space within the district is relatively good; however, should the Local Plan make provision for large population growth there would be a number of deficiencies. This approach will ensure that an adequate level of open space is provided to meet the requirements of the population by 2033.

Health and Wellbeing Approaches Appraisal Summary

Management of open space and woodlands will protect and enhance natural historic environments and the setting of the built historic environments. The provision of local open space will make it accessible to all and reduce the need to travel elsewhere, therefore decreasing the amount of greenhouse gas emissions released from car journeys. The provision of further open space may create additional jobs in the leisure sector. Open space will protect the landscape and biodiversity, there is also be the opportunity to create some dual use open space that will also offer some flood protection measures.

All of the approaches will help to protect and where possible increase the amount of open space within the district, however, it is considered that the more prescriptive approach taken in C will add certainty and ensure that an adequate level of open space is provided.

Design and Safety Policy Approaches

The Council has identified 4 approaches for a policy relating to design and safety. The approaches can be found below, where the approaches have been appraised against the Sustainability Framework.

With no decision made on what delivery strategy the Council will choose, density planning policies cannot be prepared. Approaches relating specifically to density are likely to be generated, where appropriate, in the next version of the Local Plan document.

Sustainability Appraisal Objective →

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
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A. Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance.

short	N/A	+	+	N/A	+	0	0	+	0	+	+	N/A	N/A	+	0	0
medium	N/A	+	+	N/A	+	0	0	+	0	+	+	N/A	N/A	+	0	0
long	N/A	+	+	N/A	+	0	0	+	0	+	+	N/A	N/A	+	0	0

B. Retain Core Strategy Policy 18 - Character and Design and Policy 19 - Density.

short	N/A	+	+	N/A	+	0	0	+	0	+	+	N/A	N/A	+	0	0
medium	N/A	+	+	N/A	+	0	0	+	0	+	+	N/A	N/A	+	0	0
long	N/A	+	+	N/A	+	0	0	+	0	+	+	N/A	N/A	+	0	0

C. Prepare a more prescriptive policy design and safety planning policy

short	N/A	++	++	N/A	+	0	0	+	0	+	+	N/A	N/A	+	0	0
medium	N/A	++	++	N/A	+	0	0	+	0	+	+	N/A	N/A	+	0	0
long	N/A	++	++	N/A	+	0	0	+	0	+	+	N/A	N/A	+	0	0

D. Recognise and defer local design policies to Neighbourhood Plans

short	N/A	+	+	N/A	+	0	0	+	0	+	+	N/A	N/A	+	0	0
medium	N/A	+	+	N/A	+	0	0	+	0	+	+	N/A	N/A	+	0	0
long	N/A	+	+	N/A	+	0	0	+	0	+	+	N/A	N/A	+	0	0

Design and Safety Policy Approaches Appraisal Summary

A.	Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance.	All of the approaches are seeking a high quality of design, however, it is considered that approaches B and C have the potential to most effectively respect and respond to the local area. The provision of good design in development can have positive impacts on health and well-being. Well designed places can help encourage social interaction, access to local services and promote a safe environment. Good design can have positive impacts on landscape character by ensuring that development responds positively to the local character of the area. Whichever approach is chosen the policy should place an emphasis on sustainable construction and promote recycling facilities within developments such as community composting and outside storage for recyclable goods.
B.	Retain Core Strategy Policy 18 -Character and Design and Policy 19 Density	
C.	Prepare a more prescriptive policy design and safety planning policy	
D.	Recognise and defer local design policies to Neighbourhood Plans	

A. Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance.

While the NPPF seeks to plan positively for high quality and inclusive design it will not provide any locally distinctive design policies. As each application will be considered on a case by case basis it will not achieve a consistent approach that could have a detrimental impact on the setting and defining characteristics of an area.

B. Retain Core Strategy Policy 18 - Character and Design and Policy 19 - Density.

This is an overarching design policy that covers the whole of the district. Reference is made to Village Design Statements, however, only one of these have been adopted within the District so if this policy is taken forward as the preferred approach other areas of the District should consider the production of design statements.

C. Prepare a more prescriptive policy design and safety planning policy

A prescriptive policy will ensure that the design of the development responds positively to the site and the local character of the area. There are concerns that the character of the built up area varies considerably across the district, therefore, the policy will need to reflect this and have a degree of flexibility.

D. Recognise and defer local design policies to Neighbourhood Plans

The production of a Neighbourhood Plan allows community groups to take the lead in shaping the future of their neighbourhood with design being a fundamental part. While the areas covered by Neighbourhood Plans would have locally distinctive design policies that will respect the character, setting and local context, not all areas Parishes have started in the production of a Neighbourhood Plan which could lead to an inconsistent approach across the district.

Design and Safety Approaches Appraisal Summary

All of the approaches are seeking a high quality of design, however, it is considered that approaches B and C have the potential to most effectively respect and respond to the local area.

The provision of good design in development can have positive impacts on health and well-being. Well-designed places can help encourage social interaction, access to local services and promote a safe environment. Good design can have positive impacts on landscape character by ensuring that development responds positively to the local character of the area. Whichever approach is chosen the policy should place an emphasis on sustainable construction and promote recycling facilities within developments such as community composting and outside storage for recyclable goods.

Environmental Design Policy Approaches

The Council identified 5 approaches for a policy relating to environmental design. The approaches can be found below, where the approaches have been appraised against the Sustainability Framework.

Sustainability Appraisal Objective →

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
--	---	---	---	---	---	---	---	---	---	----	----	----	----	----	----	----

A. Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance.

short	0	0	0	N/A	N/A	N/A	N/A	+	+	0	0	0	N/A	N/A	0	0
medium	0	0	0	N/A	N/A	N/A	N/A	+	+	0	0	0	N/A	N/A	0	0
long	0	0	0	N/A	N/A	N/A	N/A	+	+	0	0	0	N/A	N/A	0	0

B. Rely solely on Building Regulations in respect of access and water, and an optional nationally described space standard.

short	0	+	0	N/A	N/A	N/A	N/A	+	+	0	0	0	N/A	N/A	0	0
medium	0	+	0	N/A	N/A	N/A	N/A	+	+	0	0	0	N/A	N/A	0	0
long	0	+	0	N/A	N/A	N/A	N/A	+	+	0	0	0	N/A	N/A	0	0

C. Seek to require optional standards above Building Regulations.

short	-	+	0	N/A	N/A	N/A	N/A	+	+	+	+	+	N/A	N/A	0	0
medium	+	+	0	N/A	N/A	N/A	N/A	+	+	+	+	+	N/A	N/A	0	0
long	+	+	0	N/A	N/A	N/A	N/A	+	+	+	+	+	N/A	N/A	0	0

D. Retain Core Strategy Policy 14 - Sustainable Construction and Policy 15 - Environmental Quality.

short	+	+	0	N/A	N/A	N/A	N/A	++	+	+	+	+	N/A	N/A	-	0
medium	+	+	0	N/A	N/A	N/A	N/A	++	+	+	+	+	N/A	N/A	-	0
long	+	+	0	N/A	N/A	N/A	N/A	++	+	+	+	+	N/A	N/A	-	0

E. Allocate specific sites for large scale energy generation.

short	0	0	0	N/A	N/A	N/A	N/A	++	+	N/A	+	N/A	N/A	N/A	-	0
medium	0	0	0	N/A	N/A	N/A	N/A	++	+	N/A	+	N/A	N/A	N/A	-	0
long	0	0	0	N/A	N/A	N/A	N/A	++	+	N/A	+	N/A	N/A	N/A	-	0

Environmental Design Policy Approaches		
A.	Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance.	<p>All of the approaches have scored well as they seek to improve the environmental performance of future buildings. Approach D scores particularly well as it requires a reduction in CO2 emissions above those required by building regulations. Approach C also scores well, however, it may initially impact on the viability of delivering housing in the short term, but, this could be overcome and in the longer term it will reduce running costs for the resident.</p> <p>The reduction of greenhouse gas emissions is a global issue but taking a broad view of these different policy approaches they will help to mitigate against the changing climate to varying degrees. It is not considered that any of the approaches will have any detrimental significant impacts, however, if any sites are allocated for large scale energy generation their impact on the landscape needs to be carefully considered.</p>
B.	Rely solely on Building Regulations in respect of access and water, and an optional nationally described space standard.	
C.	Seek to require optional standards above Building Regulations.	
D.	Retain Core Strategy Policy 14 - Sustainable Construction and Policy 15 Environmental Quality.	
E.	Allocate specific sites for large scale energy generation.	

A. Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance.

The NPPF promotes the production of energy from renewable and low carbon sources, however, without specific targets it may be difficult to negotiate on a site by site basis and maximise the delivery of these technologies. Without the identification of suitable areas for locating renewable energy technologies there could be adverse impacts on the landscape. The reliance solely on the NPPF will mean that development in the future will meet building regulations, but the Council will not be able to require standards above this.

B. Rely solely on Building Regulations in respect of access and water, and an optional nationally described space standard.

This approach will achieve a similar standard of development as approach A, for this reason they have achieved the same score. However, this approach will set an internal space standard, helping to ensure that future development is the size and type of housing that is needed and for this reason this approach has scored positively against SA objective 2 which looks to improve the health and wellbeing of the population. When the assessment for the space standard is carried out it needs to be considered alongside the 'design and safety' policy as they are closely linked.

C. Seek to require optional standards above Building Regulations.

While this approach will allow the Council to set bespoke standards for access and space, it is considered that the ability to improve water efficiency standards will have a direct impact on environmental design. The production of the 'design and safety' policy will need to consider the possibility of setting access and space standards that exceed those set out in Building Regulations, if justified. The ability to improve water efficiency in new development will assist in the adapting to the impacts of the changing climate, as a result this approach has scored well against the SA objective 10.

D. Retain Core Strategy Policy 14 - Sustainable Construction and Policy 15 - Environmental Quality.

Part of the policy encourages the use of the Code for Sustainable Homes. However, this approach can no longer be used as it has been superseded at a national level. This approach encourages commercial development to meet the 'BREEAM¹' "very good" standard which will significantly improve the environmental performance of the buildings. The Council have been successfully ensuring that all new development provides a saving in CO₂ emissions from renewable energy technologies, therefore it scores practically well against SA objective 8 which seeks the reduction of greenhouse gas emissions and movement to a low carbon economy.

E. Allocate specific sites for large scale energy generation.

Although it is considered that some forms of energy generation could have a detrimental impact on the landscape this approach will ensure that they are located in an area of minimal impact and if a significant number of renewables are being considered the cumulative impact on the landscape is properly assessed. Following the SA appraisal it is recommended that the approach is amended to state, "large scale renewable or low carbon energy generation".

Environmental Design Approaches Appraisal Summary

All of the approaches have scored well as they seek to improve the environmental performance of future buildings. Approach D scores particularly well as it requires a reduction in CO₂ emissions above those required by building regulations. Approach C also scores well, however, it may initially impact on the viability of delivering housing in the short term, but, this will be overcome and in the longer term it will reduce running costs for the resident.

The reduction of greenhouse gas emissions is a global issue but taking a broad view of these different policy approaches they will help to mitigate against the changing climate to varying degrees. It is not considered that any of the approaches will have any detrimental significant impacts, however, if any sites are allocated for large scale energy generation their impact on the landscape and biodiversity needs to be carefully considered.

¹ BREEAM is a design and assessment method for sustainable buildings

Landscape Policy Approaches

The Council identified 4 approaches for a policy relating to landscape. The approaches can be found below, where the approaches have been appraised against the Sustainability Framework.

Sustainability Appraisal Objective →

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
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A. Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance.

short	0	+	+	+	N/A	N/A	0	-/?	N/A	N/A	N/A	+	+	+	+	+
medium	0	+	+	+	N/A	N/A	0	-/?	N/A	N/A	N/A	+	+	+	+	+
long	0	+	+	+	N/A	N/A	0	-/?	N/A	N/A	N/A	+	+	+	+	+

B. Retain Core Strategy Policy 20 - Areas of Outstanding Natural Beauty and Policy 21 - Landscape and Countryside

short	-/?	++	++	+	N/A	N/A	0	-/?	N/A	N/A	N/A	+	+	++	++	++
medium	-/?	++	++	+	N/A	N/A	0	-/?	N/A	N/A	N/A	+	+	++	++	++
long	-/?	++	++	+	N/A	N/A	0	-/?	N/A	N/A	N/A	+	+	++	++	++

C. Amend Core Strategy Policy 20 - Areas of Outstanding Natural Beauty (AONB) to remove reference to the Area of Great Landscape Value and replace with Surrey AONB candidate areas

short	0	+	+	+	N/A	N/A	0	-/?	N/A	N/A	N/A	+	+	+	+	+
medium	0	+	+	+	N/A	N/A	0	-/?	N/A	N/A	N/A	+	+	+	+	+
long	0	+	+	+	N/A	N/A	0	-/?	N/A	N/A	N/A	+	+	+	+	+

D. Prepare more prescriptive policies, which designates local landscape character area and includes reference to AONB Management Plans.

short	-/?	++	++	+	N/A	N/A	0	-/?	N/A	N/A	N/A	+	+	++	++	++
medium	-/?	++	++	+	N/A	N/A	0	-/?	N/A	N/A	N/A	+	+	++	++	++
long	-/?	++	++	+	N/A	N/A	0	-/?	N/A	N/A	N/A	+	+	++	++	++

Landscape Policy Approaches

A.	Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance.	The area where the AONB is located close to the built up area and established settlements is limited so its protection should not significantly impact on the delivery of housing or other development. Approach B and D look to protect legitimate areas in addition to the AONB and across the District. This could include large areas of the District and consideration of the current evidence, including the Surrey Landscape Character Assessment and further work will need to be done to assess the landscape to ensure that those of high intrinsic value will be protected and taken into account when considering future development. The conservation and enhancement of the landscape will help to increase tourism to the District and there may also be the opportunity for rural jobs. Protection of landscape also contributes to the protection of water quality and safeguarding soil quality. However, landscape designation might prevent some forms of renewable energy production taking place within the District if it results in prohibitive policies for the benefit of the landscape and could limit the locations where renewables could be sited.
B.	Retain Core Strategy Policy 20 -Areas of Outstanding Natural Beauty and Policy 21 - Landscape and Countryside	
C.	Amend Core Strategy Policy 20 -Areas of Outstanding Natural Beauty (AONB) to remove reference to the Area of Great Landscape Value and replace with Surrey AONB candidate areas	
D.	Prepare more prescriptive policies, which designates local landscape character area and includes reference to AONB Management Plans.	

A. Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance.

While this approach will give great weight to conserving the landscape and scenic beauty to the Areas of Outstanding Natural Beauty, it will be difficult to protect the other landscapes without a locally specific policy. The NPPF supports local landscape designation and therefore some element of a local policy is likely to still be needed.

B. Retain Core Strategy Policy 20 - Areas of Outstanding Natural Beauty and Policy 21 - Landscape and Countryside

These policies conserve and enhance the landscape character of the district and CSP 20 of the Core Strategy sets out the principles that should be followed in the AONB and AGLV. This approach scores well against the SA objectives as it offers a high level of protection for the AONB and AGLV and it will also conserve and enhance other landscapes across the district. However, CSP20 still refers to the AGLV as a land designation which is unlikely to be carried forward due to its connection with the now revoked Surrey Structure Plan and an up to date consideration of the land currently considered as AGLV will be needed.

C. Amend Core Strategy Policy 20 - Areas of Outstanding Natural Beauty (AONB) to remove reference to the Area of Great Landscape Value and replace with Surrey AONB candidate areas

This offers a robust approach to the conservation and enhancement of the AONB and the candidate areas where the AONB may be extended to include. However, the AONB candidate areas do not cover all of the land currently included as AGLV and the policy does not offer any protection to landscapes outside of these areas. If this approach is taken forward it is recommended that text is included within the policy to protect the character and distinctiveness of all the districts landscapes as supported by relevant evidence such as the Landscape Character Assessment.

D. Prepare more prescriptive policies, which designates local landscape character area and includes reference to AONB Management Plans.

This approach scores particularly well as local landscapes will be carefully selected and a prescriptive policy is an effective tool to protect the area as appropriate. While the NPPF does place great weight on the protection of AONBs, reference to the AONB Management Plans will offer locally distinct policy to ensure that these areas are planned positively for their protection, enhancement and management.

Landscape Approaches Appraisal Summary

The area where the AONB is located close to the built up area and established settlements is limited so its protection should not significantly impact on the delivery of housing or other development. Approach B and D look to protect legitimate areas in addition to the AONB and across the District. This could include large areas of the District and consideration of the current evidence, including the Surrey Landscape Character Assessment and further work will need to be done to assess the landscape to ensure that those of high intrinsic value will be protected and taken into account when considering future development.

The conservation and enhancement of the landscape will help to increase tourism to the District and there may also be the opportunity for rural jobs. Protection of landscape also contributes to the protection of water quality and safeguarding soil quality. However, landscape designation might prevent some forms of renewable energy production taking place within the District if it results in prohibitive policies for the benefit of the landscape and could limit the locations where renewables could be sited.

Biodiversity and Geodiversity Policy Approaches

The Council identified 3 approaches for a policy relating to biodiversity and geodiversity. The approaches can be found below, where the approaches have been appraised against the Sustainability Framework.

Sustainability Appraisal Objective →

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
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A. Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance.

short	0	+	0/?	+	+	N/A	0	0	N/A	0	N/A	+	0	+	+	+
medium	0	+	0/?	+	+	N/A	0	0	N/A	0	N/A	+	0	+	+	+
long	0	+	0/?	+	+	N/A	0	0	N/A	0	N/A	+	0	+	+	+

B. Retain Core Strategy Policy 17 – Biodiversity

short	0	+	0/?	+	++	N/A	0	0	N/A	0	N/A	+	0	+	+	++
medium	0	+	0/?	+	++	N/A	0	0	N/A	0	N/A	+	0	+	+	++
long	?	+	0/?	+	++	N/A	0	0	N/A	0	N/A	+	0	+	+	++

C. Prepare prescriptive policies, identifying in detail the Council's approach to different types of biodiversity and geodiversity assets

short	0	+	0/?	+	+/?	N/A	0	0	N/A	0	N/A	+	0	+	++	++
medium	0	+	0/?	+	+/?	N/A	0	0	N/A	0	N/A	+	0	+	++	++
long	?	+	0/?	+	+/?	N/A	0	0	N/A	0	N/A	+	0	+	++	++

Biodiversity and Geodiversity Policy Approaches

A.	Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance.	<p>The protection and identification of new areas may restrict housing development in the long term, the same could also be said for the supply of employment land, however, the Economic Needs Assessment is looking to make the best use of existing sites rather than the allocation of new sites. In addition to the designated biodiversity assets, back garden land and brownfield sites can also be very valuable, it is therefore important that the policy makes reference to this to offer them the necessary protection, where appropriate.</p> <p>Heritage assets can make a significant contribution to biodiversity for species such as bats, owls and plant life. There is no mention of heritage assets within the policy and this could be included to acknowledge this positive impact.</p> <p>The protection and enhancement of biodiversity will enrich the local environment, make them more accessible, act as a green lung when delivered in an urban area and contribute to our well-being.</p> <p>All of the approaches offer protection to biodiversity within the District and relate to 'green areas' in the natural environment, however, approach C offers the opportunity to recognise the contribution that the built environment can make to biodiversity in terms of protecting, enhancing and supporting species of flora and fauna.</p>
B.	Retain Core Strategy Policy 17 – Biodiversity	
C.	Prepare prescriptive policies, identifying in detail the Council's approach to different types of biodiversity and geodiversity assets	

A. Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance.

The NPPF aims to conserve and enhance biodiversity by setting out a number of principles which largely focus on the protection of nationally designated sites. This approach has scored positively against a number of the SA objectives. However, as the NPPF only focuses on national designations it has scored lower than the other approaches as it lacks the local distinctiveness.

B. Retain Core Strategy Policy 17 – Biodiversity

This approach scores well against the SA objectives as it looks to enhance and where possible provide for the expansion of biodiversity in accordance with the aims of the Surrey Biodiversity Action Plan. If this policy is taken forward it will need to be updated to reflect the introduction of the Biodiversity Opportunity Area Policy Statements and the Biodiversity Planning in Surrey document.

C. Prepare prescriptive policies, identifying in detail the Council's approach to different types of biodiversity and geodiversity assets

This approach offers the opportunity to protect and enhance areas within the District, which are not currently designated, to enhance the quality and character of places. For example the NPPF relates mainly to 'green spaces' in the natural environment and a locally distinctive policy could recognise the contribution that the built environment plays in terms of protecting and supporting species of flora and fauna.

Biodiversity and Geodiversity Appraisal Approaches Summary

The protection and identification of new environmental areas may restrict housing development in the long term, the same could also be said for the supply of employment land, however, the Economic Needs Assessment is looking to make the best use of existing sites rather than the allocation of new sites. In addition to the designated biodiversity assets, back garden land and brownfield sites can also be very valuable, it is therefore important that the policy makes reference to this to offer them the necessary protection.

Heritage assets can make a significant contribution to biodiversity for species such as bats, owls and plant life. There is no mention of heritage assets within the policy and this could be included to acknowledge this positive impact.

The protection and enhancement of biodiversity will enrich the local environment, make them more accessible, act as a green lung when delivered in an urban area and contribute to our well-being.

All of the approaches offer protection to biodiversity within the District and relate to 'green areas' in the natural environment. However, approach C offers the opportunity to recognise the contribution that the built environment can make to biodiversity in terms of protecting and supporting species of flora and fauna.

Heritage Policy Approaches

The Council identified 4 approaches for a policy relating to heritage assets. The approaches can be found below, where the approaches have been appraised against the Sustainability Framework.

Sustainability Appraisal Objective 

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
---	---	---	---	---	---	---	---	---	----	----	----	----	----	----	----

A. Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance.

short	-	+	+	+	+/?	N/A	N/A	-	+	N/A	N/A	N/A	N/A	N/A	0	0
medium	-	+	+	+	+/?	N/A	N/A	-	+	N/A	N/A	N/A	N/A	N/A	0	0
long	-	+	+	+	+/?	N/A	N/A	-	+	N/A	N/A	N/A	N/A	N/A	0	0

B. Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance and commit to a review of Conservation Areas

short	-	+	+	+	+/?	N/A	N/A	-	+	N/A	N/A	N/A	N/A	N/A	0	0
medium	-	+	+	+	+/?	N/A	N/A	-	+	N/A	N/A	N/A	N/A	N/A	0	0
long	-	+	+	+	+/?	N/A	N/A	-	+	N/A	N/A	N/A	N/A	N/A	0	0

C. Develop a specific heritage policy but not commit to a review of Conservation Areas

short	-	+	++	+	+/?	N/A	N/A	-	+	N/A	N/A	N/A	N/A	N/A	0	0
medium	-	+	++	+	+/?	N/A	N/A	-	+	N/A	N/A	N/A	N/A	N/A	0	0
long	-	+	++	+	+/?	N/A	N/A	-	+	N/A	N/A	N/A	N/A	N/A	0	0

D. Develop a specific heritage policy and commit to a review of Conservation Areas

short	-	+	++	+	+/?	N/A	N/A	-	+	N/A	N/A	N/A	N/A	N/A	0	0
medium	-	+	++	+	+/?	N/A	N/A	-	+	N/A	N/A	N/A	N/A	N/A	0	0
long	-	+	++	+	+/?	N/A	N/A	-	+	N/A	N/A	N/A	N/A	N/A	0	0

Heritage Policy Approaches		
A.	Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance.	All of the approaches score well against the SA objectives as they provide a positive strategy for the conservation and enjoyment of the historic environment.
B.	Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance and commit to a review of Conservation Areas	The conservation and enhancement of historic buildings brings benefits to community vitality in terms of maintaining our cultural heritage. However, there could be instances where this could hinder the redevelopment of a building for alternative uses and this may in turn lead to the building or asset becoming vacant. There could also be restrictions imposed on the historic environment that could limit the quantum of development.
C.	Develop a specific heritage policy but not commit to a review of Conservation Areas	
D.	Develop a specific heritage policy and commit to a review of Conservation Areas	Approaches C and D gives the opportunity for the policy to clearly set out the importance of heritage assets and how they can add to local distinctiveness and to sense of place, in turn bringing positive effects for the community. A review of the conservation areas, which is required in approaches B and D, will have a positive impact; however, due to the time it will take to carry out this work it is anticipated that this will occur in the medium to long term.

A. A. Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance.

The NPPF provides a positive strategy for the conservation and enjoyment of the historic environment and would require an applicant to describe the significance of any heritage assets affected. The policy has scored well against the majority of the sustainability objectives and with the existing list of designated heritage assets this approach would offer a stable approach to the conservation of the historic environment.

B. Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance and commit to a review of Conservation Areas

There are 19 conservation areas within Tandridge district and this approach would see a review of them, identify if further parts should be included and consider additional conservation areas. A review of the conservation areas will ensure that all the features, listed or otherwise, within the area, are recognised as part of its character. Due to the time it will take to complete the conservation area appraisals it is considered that the benefits will only be seen in the medium to longer term.

C. Develop a specific heritage policy but not commit to a review of Conservation Areas

The provision of a locally distinctive policy is a favourable approach that will take account of protecting and enhancing the significance of heritage assets and make the most of opportunities to draw on the contribution made by the historic environment to the character of place. There are concerns that the existing conservation areas have not been reviewed since they were introduced so may lack the specific detail.

D. Develop a specific heritage policy and commit to a review of Conservation Areas

The approach scores positively against the SA objectives as it will provide a locally distinctive policy and a review of the conservation areas, however, due to the time it will take to complete the appraisals it is considered that the benefits will only be seen in the medium to longer term.

Heritage Approaches Appraisal Summary

All of the approaches score well against the SA objectives as they provide a positive strategy for the conservation and enjoyment of the historic environment.

The conservation and enhancement of historic buildings brings benefits to community vitality in terms of maintaining our cultural heritage. However, there could be instances where this could hinder the redevelopment of a building for alternative uses and this may in turn lead to the building or asset becoming vacant. There could also be restrictions imposed on the historic environment that could limit the quantum of development.

Approaches C and D gives the opportunity for the policy to clearly set out the importance of heritage assets and how they can add to local distinctiveness and to sense of place, in turn bringing positive effects for the community. A review of the conservation areas, which is required in approaches B and D, will have a positive impact, however, due to the time it will take to carry out this work it is anticipated that this will occur in the medium to long term.

Green Belt Policy Approaches

The Council identified 2 approaches for a policy relating to the Green Belt. The approaches can be found below, where the approaches have been appraised against the Sustainability Framework.

Sustainability Appraisal Objective →

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
---	---	---	---	---	---	---	---	---	----	----	----	----	----	----	----

A. Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance.

short	-/?	+	+	N/A	++	0	0	-/?	N/A	N/A	0/?	0	0	0	+	+
medium	-/?	+	+	N/A	++	0	0	-/?	N/A	N/A	0/?	0	0	0	+	+
long	-/?	+	+	N/A	++	0	0	-/?	N/A	N/A	0/?	0	0	0	+	+

B. Reiterate national policy and set out that infill development within Green Belt Settlements would be supported.

short	0/?	+	+	N/A	++	0	0	-/?	N/A	N/A	0/?	0	0	0	+	+
medium	0/?	+	+	N/A	++	0	0	-/?	N/A	N/A	0/?	0	0	0	+	+
long	0/?	+	+	N/A	++	0	0	-/?	N/A	N/A	0/?	0	0	0	+	+

Green Belt Policy Approaches		
A.	Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance.	The NPPF approach to Green Belt policy only allows for development to take place in very special circumstances which is a constraint to the delivery of housing. However the NPPF does allow for the review of Green Belt boundaries through the Local Plan process in exceptional circumstances, this could include the need to promote sustainable patterns of development.
B.	Reiterate national policy and set out that infill development within Green Belt Settlements would be supported.	The Green Belt policy will assist in the protection of open space within the countryside, therefore, having a positive impact on the protection and enhancement of the landscape and biodiversity. However, the Green Belt designation can provide a constraint to some forms of renewable energy and low carbon technologies being installed.

A. Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance.

The NPPF attaches great importance to the Green Belt and therefore there is a presumption against development, except in limited circumstances. As a consequence, this approach performs poorly in respect of the provision of sufficient housing but scores more positively in objectives related to the natural environment. However, it should be noted that a recent government consultation is proposing that development in the green belt will be allowed on brownfield sites and on sites that have been allocated in Neighbourhood Plans.

B. Reiterate national policy and set out that infill development within Green Belt Settlements would be supported.

This approach is appraised similarly to approach A. However, allowing for limited infill development within Green Belt Settlements may enable the delivery of needed new homes within such locations and thus has the potential to have some positive effects in relation to the first objective. The approach would still score positively in relation to the natural environment as it would still limit development across the majority of the Green Belt.

Green Belt Approaches Appraisal Summary

The NPPF approach to Green Belt policy only allows for development to take place in very special circumstances which is a constraint to the delivery of housing. However the NPPF does allow for the review of Green Belt boundaries through the Local Plan process in exceptional circumstances, this could include the need to promote sustainable patterns of development.

The Green Belt policy will assist in the protection of open space within the countryside, therefore, having a positive impact on the protection and enhancement of the landscape and biodiversity. However, the Green Belt designation can provide a constraint to some forms of renewable energy and low carbon technologies being installed.

Aviation Planning Policy Approaches

This policy area covers Redhill Aerodrome and two airports that are outside of the district, Gatwick Airport and Biggin Hill Airport. Although they are located outside of the district they have a significant impact on the area. At the time of writing the future for both these airports is uncertain as the Government is yet to determine whether another runway will be provided at Gatwick or Heathrow and the expansion of Biggin Hill is set out in the Bromley's draft Local Plan, for this reason it is difficult to assess the approaches against the SA objectives.

Nevertheless, the Council has identified 4 approaches for a policy relating to aviation. The approaches can be found below, where the approaches have been appraised against the Sustainability Framework.

SA Table 2: Aviation Approaches Appraisals
Sustainability Appraisal Objective →

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
A. Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance.																
short	0	-/?	N/A	+/?	N/A	+	+	?	N/A	N/A	N/A	N/A	N/A	-/?	-/?	-/?
medium	0	-/?	N/A	+/?	N/A	+	+	?	N/A	N/A	N/A	N/A	N/A	-/?	-/?	-/?
long	0	-/?	N/A	+/?	N/A	+	+	?	N/A	N/A	N/A	N/A	N/A	-/?	-/?	-/?
B. Retain Core Strategy Policy 16 – Aviation																
short	0	0	N/A	+	N/A	-	-	+	N/A	N/A	N/A	N/A	N/A	0	0	0
medium	0	0	N/A	+	N/A	-/?	-/?	+/?	N/A	N/A	N/A	N/A	N/A	0	0	0
long	0	0	N/A	+	N/A	-/?	-/?	+/?	N/A	N/A	N/A	N/A	N/A	0	0	0
C. Amend the wording in Core Strategy Policy 16 - Aviation to recognise individual activities at airports in relation to land use within Tandridge.																
short	0/?	?	N/A	?	N/A	+	+	?	N/A	N/A	N/A	N/A	N/A	0	0/?	0/?
medium	0/?	?	N/A	?	N/A	+	+	?	N/A	N/A	N/A	N/A	N/A	0	0/?	0/?
long	0/?	?	N/A	?	N/A	+	+	?	N/A	N/A	N/A	N/A	N/A	0	0/?	0/?
D. Keep liaising with Gatwick and Biggin Hill as well as with adjoining local authorities on the approach to Gatwick and a potential second runway, and the expansion at Biggin Hill. The Council could safeguard land for whether Gatwick came forward, however, an appropriate location for this is unknown at this moment in time. The Council could suggest that the Local Plan is reviewed in 5 years following adoption to take account of Gatwick and Biggin Hill.																
short	+/?	?	N/A	+/?	N/A	++/?	++/?	?	N/A	N/A	N/A	N/A	N/A	?	-/?	-/?
medium	+/?	?	N/A	+/?	N/A	++/?	++/?	?	N/A	N/A	N/A	N/A	N/A	?	-/?	-/?
long	+/?	?	N/A	+/?	N/A	++/?	++/?	?	N/A	N/A	N/A	N/A	N/A	?	-/?	-/?

Aviation Policy Approaches		
A.	Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance.	There is a large degree of uncertainty in assessing these policy approaches as it is not known how Gatwick or Biggin Hill airports will develop in the future. The current approach achieves the best results against the environmental objectives as it aims to minimise the impact of the airports and oppose any expansion beyond the agreed limits, however, as the legal agreement that restricts a second runway at Gatwick expires in 2019 it is uncertain how this policy would perform in the longer term, particularly as the Government has delayed its decision on airport expansion in the south east of England. The other approaches may have a positive impact on the economy if the expansion of the airports are supported, however there could be some significant detrimental environmental impacts, therefore if any of these approaches are pursued they will need to carefully consider appropriate mitigation measures.
B.	Retain Core Strategy Policy 16 – Aviation	
C.	Amend the wording in Core Strategy Policy 16 -Aviation to recognise individual activities at airports in relation to land use within Tandridge.	
D.	Keep liaising with Gatwick and Biggin Hill as well as with adjoining local authorities on the approach to Gatwick and a potential second runway, and the expansion at Biggin Hill. The Council could safeguard land for whether Gatwick came forward, however, an appropriate location for this is unknown at this moment in time. The Council could suggest that the Local Plan is reviewed in 5 years following adoption to take account of Gatwick and Biggin Hill.	

A. Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance.

Reliance on the NPPF could lead to an approach that would allow for development in the future that will support economic growth and provide local jobs, however, this would lead to a detrimental impact on the environmental indicators. This unplanned approach to aviation related development at a local level would not provide any certainty to investors, residents or businesses and mitigation measures may be missed.

B. Retain Core Strategy Policy 16 – Aviation

This policy will retain the amount of flying within the currently agreed limits, therefore, not exacerbating air, noise and light pollution. However, it is unsure what will happen in the longer term as the legal agreement restricting a second runway at Gatwick Airport expires in 2019 and the Government has delayed its decision on airport expansion. The policy looks to minimise the use of the private car to travel to the airport, therefore scoring well against SA objective 4. This is a restrictive approach to aviation in and around the District which could have a detrimental impact on the local economy and reduce the provision of local jobs in the future. However, it does score positively against the environmental indicators as it looks to retain development within the agreed limits.

C. Amend the wording in Core Strategy Policy 16 - Aviation to recognise individual activities at airports in relation to land use within Tandridge.

Without it being clear how Gatwick and Biggin Hill will develop in the future it is unknown what level of associated development would be required. Recognising the need for airport related land uses within the District will help the airports to develop.

D. Keep liaising with Gatwick and Biggin Hill as well as with adjoining local authorities on the approach to Gatwick and a potential second runway, and the expansion at Biggin Hill. The Council could safeguard land for whether Gatwick came forward, however, an appropriate location for this is unknown at this moment in time. The Council could suggest that the Local Plan is reviewed in 5 years following adoption to take account of Gatwick and Biggin Hill.

While it is not known how Gatwick or Biggin Hill airports will develop in the future the approach of safeguarding land could provide for the necessary homes and employment floor space that would be required, therefore scoring positively against SA objectives 1, 6 and 7. The safeguarding of land near to the airport for activities associated with Gatwick will reduce travel distances.

Aviation Approaches Appraisal Summary

There is a large degree of uncertainty in assessing these policy approaches as it is not known how Gatwick or Biggin Hill airports will develop in the future. The current approach achieves the best results against the environmental objectives as it aims to minimise the impact of the airports and oppose any expansion beyond the agreed limits, however, as the legal agreement that restricts a second runway at Gatwick expires in 2019 it is uncertain how this policy would perform in the longer term. The other approaches may have a positive impact on the economy if the expansion of the airports are supported, however there could be some significant detrimental environmental impacts, therefore if any of these approaches are pursued they will need to carefully consider mitigation measures.

5.1.3 Sustainability Appraisal for Regulation 18 – Sites Consultation (October 2016)

Assessment of sites

In the 2016 SA, Tandridge District 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 discusses each settlement as a whole. The sites within each settlement were also considered individually as a part of preparing the overall commentary for each site. Additional commentary was prepared where there was an effect on a specific site, in particular where in some instances sites were separated from the main settlement area.

The results of the 2016 SA of sites have been re-produced in this report in Section 5.11 and are broadly speaking considered still valid for the majority of objectives.

However, since the 2016 appraisal was prepared, Tandridge District Council commissioned additional site-by-site ecology and landscape evidence, which was not available for use in the 2016 appraisal. For completeness, the results of this separate evidence gathering exercise have been subject to the supplementary SA appraisal below which reflects the findings of the subsequent more detailed evidence that was undertaken.

Assessment of Concept Areas

Within the 2016 SA, Tandridge District Council also identified seven locations within the district that were potential locations for a large scale mixed use development that would be expected to include commercial floorspace and approximately 2,000 homes.

These were referred to as 'concept areas'. Neither the full development specification of the concept areas, nor the precise location and extent of them was known at the time. However, it is considered that a generic assessment of 2000 homes plus commercial floorspace provides the necessary and proportionate level of assessment necessary to appraise the likely impacts of a large-scale new settlement. Therefore the results can broadly be considered applicable to the concept of a 'new garden settlement'.

A summary of the results from the assessment of the concept areas is provided in Table 6.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport	P. Developed Land	Economics	Employment	C. Change Mitigation	Natural Resources	C. Change Adaptation	Flood Risk	Water Quality	Contaminated land and soils	Air quality	Landscape	Biodiversity
Blindley Heath	++	-	○	-	-	○	+	○	+/-	○	-	+/-	+/-	-	-	-
Burslow (Home)	++	-	-	--	-	○	+	○	-	○	○	○	-	-	-	-
Copthorne	++	-	○	+	-	○	+	○	+/-	○	-	+/-	+/-	+/-	-	-
Hobbs Industrial Estate	++	-	-	--	+/-	○	+	○	+/-	○	-	-	+	+/-	+/-	-
Lamb's	++	-	-	-	+/-	○	+	○	+/-	○	+	-	+	-	-	-
Lingfield	++	++	-	+	-	○	+	○	+/-	○	-	+/-	+/-	-	-	-
South Godstone	++	-	○	+	-	○	+	○	+/-	○	-	+/-	+/-	+	-	-

Table 6: Assessment of Concept Areas

The 2016 SA contains more detailed descriptive textual assessment of the areas in question, and can be cross-referred to.

Mitigation Considerations and Recommendations

The 2016 Sites SA also considered recommendations for mitigations according the sixteen SA objectives.

Section 7 of this 2018 report reconsiders the extent to which the 2016 recommendations have been applied in the emerging regulation 19 version of the Local Plan 2033. Section 7 also identifies other potential mitigations that have emerged, including via more recent evidence, including the HRA. It should be noted that this process took place during the preparation of the Regulation 19 Plan, so it is possible that some of the 'recommendations' have in fact already been acted upon within the Local Plan 2033.

5.1.4 Sustainability Appraisal for Regulation 18 – Potential Garden Village² Locations (August 2017)

The 2017 SA Report presented an assessment of the potential Garden Village locations with the intention 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.

Ten 'potential Garden Village locations' were assessed against 16 SA Framework Objectives, taking account of the topics listed in Annex 1(f) of the Strategic Environmental Assessment (SEA) Directive. These included:

- 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.

It was noted that seven potential Garden Village locations were previously been considered in the SA Sites Consultation (2016) Report. Where this had been the case, the findings from the 2016 Report were carried forward and reconsidered in this 2017 Report. It was noted that since the publication of the SA Sites Consultation (2016) further information had become available in relation to the seven potential Garden Village locations that were considered in the SA Sites Consultation (2016) and the Council identified three additional potential Garden Village locations.

Further, in the 2017 SA, a consistency check was applied to all SAs of the potential garden village locations to ensure that the approach taken to appraisal is consistent. As a result of this, some findings for the seven potential Garden Village locations were altered slightly. These alterations were not generally considered to be significant. Appendix C of the 2017 Report compared the evolution of score.

The Council set out a vision and seven Objectives for the new Garden Village. The Garden Village Objectives seek to ensure the integration of health, education and retail and sustainable transport facilities within the Garden Village.

The 2017 SA Report illustrates how through successful application of the Garden Village Objectives, sustainability of a Garden Village development may be improved. This 2017 SA Report presented an assessment of the potential Garden village locations with the following key intentions:

- To identify where the development within a broad location is likely to result in significant 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.

It was made clear that the 2017 report should be read in conjunction with previous iterations of the SA.

Two sets of scores were produced. Firstly, in the absence of mitigation or the impact of Garden Village Principles and/or Objectives, and secondly post-mitigation.

² Note the term 'Garden Community' is now used.

Table 7: SA Scores for Garden Villages in the absence of mitigation of garden village principals and/or objectives

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport	P. Developed Land	Economics	Employment	C. Change Mitigation	Natural Resources	C. Change Adaptation	Flood Risk	Water Quality	Contaminated land and soils	Air quality	Landscape	Biodiversity
1	++	--	O	-	--	-	+	-	+/-	O	-	-	-	-	-	-
2	++	-	--	-	--	+	+	--	--	-	+	-	--	-	--	-
3	++	-	-	-	--	+	+	-	-	-	+	-	-	-	-	-
4	++	+	-	-	--	-	-	-	-	-	--	-	-	-	-	-
5	++	-	-	+	--	+	+	--	-	-	-	+/-	-	-	-	-
6	++	-	-	--	--	O	+	-	-	-	+	O	-	-	-	-
7	++	+	O	+	-	O	+	-	-	O	-	+/-	-	-	-	-
8	++	--	O	--	++	+/-	+	-	+	O	O	-	+	-	-	--
9	++	--	-	+	+	+/-	+	-	+/-	O	+	+/-	+	-	-	-
10	++	+	-	+	-	+	+	-	+/-	-	-	+/-	-	-	-	-

Each row is numbered, relating to a potential Garden Village location, as follows: 1. Blindley Heath, 2. Chaldon, Alderstead and Tollsworth Farm, 3. West of Edenbridge, 4. Redhill Aerodrome, 5. South Godstone, 6. Horne, 7. Copthorne, 8. Hobbs Industrial Estate, 9. Lambs Business Park and 10. Lingfield.

5.2 SA of Our Local Plan: 2033 - Vision

The vision provides a look into the future as to what the people and place of Tandridge will be like.

A version of the emerging Local Plan Vision was assessed as part of the 2015 Issues & Approaches Options SA, as described in the earlier Section 5.12.

However, like the Plan itself this has evolved and requires re-assessment. The latest Vision for Our Local Plan: 2033 (Regulation 19) , together with an SA assessment can be found below.

Tandridge District: 2033

The **people** of Tandridge will have access to homes, jobs, education, leisure and health facilities to meet their needs whatever their age, household requirements or culture.

Our District will *overwhelmingly* be a **place** with green and open spaces to support the health and well-being of the community. It will be a place where people live close to, and have access, to services and facilities in successful towns, local and neighbourhood centres. Where travel is necessary, our residents will have access to improved road networks and sustainable public transport. High quality design will play a key role in reducing and remediating flood risk. It will also ensure the District remains pleasant, safe and secure, making the most of historic assets and regenerating areas for the benefit of all.

Table 8: SA of Our Local Plan: 2033 Vision

Vision	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
S/T	+	+	+	+	0	+	+	0	0	0	+	0	0	0	0	0
M/T	+ / ++	+ / ++	+ / ++	+ / ++	0	+ / ++	+ / ++	0	0	0	+ / ++	0	0	0	0	0
L/T	++	++	++	++	0	++	++	0	0	0	++	0	0	0	0	0

The vision seeks to enhance the quality of life for individuals and communities, therefore, produces a positive effect across a range of SA objectives. The steadily more positive effects over time are in recognition of both the fact that the vision is for the end of the plan period (2033), as well as the fact that the goals of the Vision will take time to deliver.

5.3 SA of Our Local Plan: 2033 Spatial Objectives

The Local Plan has 17 Spatial Objectives. Like the Vision, they have been developed in response to consultation comments and other feedback received over the course of developing Our Local Plan. The Spatial Objectives were previously assessed in the 2015 Issues & Approaches SA, as summarised in the earlier Section 5.1.2. The latest 2018 Spatial Objectives have broadly evolved from these. However, they are not directly comparable since in 2015 there were just fifteen objectives, compared to the current seventeen. The latest objectives (Table 9) and their accompanying SA assessment (Table 10) can be found below.

Table 9: Objectives in Our local Plan: 2033

Objective		Theme
SO1	To strengthen and diversify the economy by providing sufficient, sustainably located employment land to meet local needs and to provide opportunities for residents to work locally. Existing businesses will be supported by enabling intensification and, where appropriate, the expansion of current employment sites will be encouraged. Rural businesses and the rural economy will continue to be seen as an asset to the district and their often unique requirements, and need to be close to customers, will be respected.	Economy
SO2	Support the development of tourism by recognising local tourism assets and supporting those that enhance the local economy without significant harm to the quality of life of local residents.	Economy
SO3	Support opportunities which engender a skilled workforce, particularly at the intermediate and higher skilled levels which will also contribute to a reduction in the amount of out-commuting for employment.	Economy
SO4	Provide a supply of homes, both affordable and market, which respond to the needs of our community and supports a mixed community. New homes will diversify the existing housing stock in the district, in terms of size and type (e.g. allowing for a range of family housing, entry level homes and opportunities to downsize) and in response to identified needs.	Housing
SO5	Recognise and respond to the accommodation needs of the traveller community.	Housing
SO6	Support our town centres to be vibrant and viable through encouraging wider diverse retail and leisure opportunities as well as regeneration.	Town Centres and Retail
SO7	Encourage healthier and stronger communities across the district, by ensuring sufficient access to quality parks, open spaces, sports and community facilities and to protect the spaces and facilities that serve the needs of residents.	Health and Wellbeing
SO8	Ensure place-making by promoting development that is accessible, safe and that encourages wellbeing.	Design
SO9	Continue to support high quality design that respects the existing character of settlements and consider higher densities where appropriate.	Design
SO10	Mitigating and adapting to the impacts of climate change where possible and promoting development which is environmentally resilient.	Design
SO11	To ensure that previously developed land is fully utilised, with a focus on previously developed land and optimised densities as far as is practicably possible.	Best Use of Land
SO12	Maintain a Green Belt within Tandridge that serves the policy purposes set out in the National Planning Policy Framework and ensure the Green Belt endures beyond the plan period.	Green Belt
SO13	Maintain, enhance and respect the District's green infrastructure including landscape character, open spaces, habitats and biodiversity networks.	Landscape and Natural Environment
SO14	Preserve, enhance and protect our historic environment and heritage assets.	Historic Environment
SO15	Ensure that development avoids and mitigates flood risk in the District, incorporating Sustainable (urban) Drainage Systems (SDS/SuDS).	Flooding
SO16	Improve existing transport networks whilst supporting and encouraging the use of sustainable and integrated modes of transport.	Infrastructure
SO17	Work with partners and service providers to ensure the delivery of improved infrastructure, services and facilities to meet the needs of the district across the plan period and to ensure that the provision of new or enhanced infrastructure matches need as it arises.	Infrastructure

Table 9: SA of Local Plan Objectives

Local Plan Spatial Objective		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
		Housing	Health	Cultural Heritage	Transport & Services	P_Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
SO1	Employment Land and Sites.	0	0	0	0	0	++	++	0	0	0	0	0	0	0	0	0
SO2	Tourism	0	0	0	0	0	+	+	0	0	0	0	0	0	0	0	0
SO3	Skilled Workforce	0	0	0	+		++	++	0	0/+	0	0	0	0	0/+	0	0
SO4	Housing Supply	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SO5	Traveller Community	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SO6	Town Centres	0	+	0	++	0	+	0	0	0	0	0	0	0	0	0	0
SO7	Parks and Recreation	0	++	0	+	0	0	0	0	0	0	0	0	0	0	0	0
SO8	Place-Making	0	+	0	++	0	0	0	0	0	0	0	0	0	0	0	0
SO9	Design	+	0	0/+	0/+	0	0	0	0	0	0/+	0	0	0	0/+	0	0
SO10	Climate Change	0	+	0	0	0	0	0	++	+//++	++	0/+	+	0	+//++	0	0
SO11	Previously Developed Land and Optimised Densities	+	0	0	0	++	0	0	0	0	0	0	0	0	0	0	0
SO12	Green Belt	0	0	0/+	0	0	0	0	0	0	0	0	0	0	0	0/+	0
SO13	Green infrastructure, Landscapes and Biodiversity.	0	+	0/+	0/+	0	0	0	0/+	0	+	0/+	0/+	0	0/+	++	++
SO14	Historic Environment and Heritage Assets.	0	0	++	0	0	0	0	0	0	0	0	0	0	0	0/+	0/+
SO15	Flood Risk	0	+	0	0	0	0	0	0	+	+	++	+//++	+	0	+	+
SO16	Sustainable Transport.	0	+	0	++	0	+	0	0	+	+	0	0	0	+	0	0
SO17	Infrastructure Delivery.	0	0	0	+	0	+	0	0	0	0	0	0	0	0	0	0

5.4 SA of Options: Overall Housing Numbers

This assessment looks at options for overall housing delivery numbers and their wider sustainability impacts. The options are as follows:

- Objectively Assessed Need (OAN) – 470 dpa
- DCLG new methodology housing number – 645 dwellings per annum (dpa)
- Maximum potential in light of background evidence – 306 dpa
- Continuation of Core Strategy 2008 Equivalent – 125 dpa.

Explanation of the Different Options

Objectively Assessed Need (OAN)

The objectively assessed need figure is taken from the Strategic Housing Market Assessment (SHMA). The SHMA was undertaken by consultants Turley Associates and Neil McDonald Strategic Solutions and was first published in 2015. To determine the OAN for the District the 2015 SHMA used DCLG's 2012-based household projections (DCLG 2012) which were released in February 2015. It also utilised the 2014 Mid-Year Estimates (2014 MYE, June 2015) and the international migration statistics for the year to March 2015 which were released in August 2015. The SHMA³ was updated again in 2018 to respond to the most recent analysis pertaining to Market Signals, All Household and Affordable Housing Needs Types and the most recent Planning Inspectors' Decisions. The 2015 SHMA supported by data in the updated 2018 SHMA concluded that:

- Population growth within Tandridge is predicted to be higher 17.7% than the Surrey average of 15.2 %⁴ and the UK average at 13.3%
- A demographic need for 9,400 dwellings between the plan period was needed at 470 dwellings per annum. This was slightly higher than in the previous 2012 based projections (440pa).
- Tandridge is one of the least affordable local authority areas in Surrey with an affordability ratio of more than 14.1 times earnings and an affordable housing need of 5,680 homes over the plan period.

DCLG new methodology housing number

Since the preparation and publication of the Council's 2015 SHMA, OAN figure of 9,400 dwellings, the Government proposed a standard methodology for calculating need in its consultation paper Planning for the right homes in the right places (September 2017). The consultation paper, introduces a methodology which includes an uplift where median house prices are over 4 times the median earnings of those working in the local authority area, as is the case in Tandridge. Using this standard methodology, the DCLG, OAN figure for Tandridge was calculated to be 645 dwellings per annum over a 10 year period (2016– 2025) and in total a delivery target over 20 years of 12,900 dwellings.

Maximum potential in light of background evidence

This equates to the Local Plan figure at the time of writing which is 6124 homes over the plan period (306 dpa)

Core Strategy Housing number

The 2006 Core Strategy housing target was 2500, which equated to 125 dpa. It was imposed by the 2006-2026 South East Plan (SEP), which has since been revoked.

³ The updated 2018 SHMA retains the results of the 2015 OAN analysis.

⁴ P12 – Tandridge OAN 2015 – 2014 MYE.

Table 11: SA of Overall Housing Number

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport	P. Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
DCLG Housing Figures	++	-/--	--	--	--	-	-	--	--	-/--	-/--	--	--	--	--	--
Objectively Assessed Need (OAN)	+ / ++	-	-/--	-/--	-/--	? / -	? / -	-/--	-/--	-	-	-/--	-/--	-/--	-/--	-/--
Maximum Potential in Light of Background Evidence	+	0	-	0	-	0 / +	0 / +	-	-	0	0	-	-	-	-	-
Continuation of Core Strategy 2008 Equivalent	--	0	0	0	0	0	0	0 / -	0	0	0	0	0	0	0	0

Discussion of Options against SA Objectives

Clearly achievement of the MHCLG housing number, and to a lesser extent the objectively assessed need, are positives in respect of boosting the supply of housing (Objective 1).

However, in almost every other respect, achievement of these higher housing numbers would come at significant cost to wider sustainability objectives. In particular they would raise the likely risk of significant effects on environmental objectives, creating increasing pressures on environmental and heritage designations. Higher numbers would inevitably increase pressure for higher densities on site (reducing scope for on-site enhancements) and also lead to more greenfield development, since the District has already exhausted its supply of brownfield previously developed land. Natural resources and social infrastructure would be increasing strained with the implementation of OAN numbers, more so still with MHCLG new methodology numbers.

Even economic objectives (6&7) seem likely to be negatively affected by the OAN and MHCLG numbers. This is because the growth rate would be unsustainable, negatively affecting the balance of local homes and jobs, leading to a greater level of out-commuting. Higher housing numbers would lead to increased pressure on employment premises to change use to residential – incentivised by greater land values and a more relaxed permitted development order at national level. Pressure for housing development to be extended into tier 3 and 4 settlements, or even the open countryside would inhibit the ability of the Local Plan to reduce car dependency and support town centres.

5.5 SA of Options: Meeting Affordable Housing Need

The SHMA identified an affordable housing need for 330 dwellings per annum (2013 - 2033). Based on current affordable housing policy this would require an overall delivery of 6,605 dwellings over the plan period to deliver the required level of affordable housing in full. The affordable need represents 107% of the deliverable Local Plan housing target over the 2013-33 period.

The Local Plan has sought to maximise affordable housing delivery and the percentage requirements set out in policy 'Affordable Housing Requirement' have been informed by background viability testing. The policy has itself been subject to SA assessment (see section 5.16.11), as well as various options (1 to 5b) which consider variations of % requirements and brownfield/greenfield differentials.

However, this section assesses what would be the impacts of meeting affordable housing needs in their entirety.

Table 12: SA of Meeting Affordable Housing Needs

		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
		Housing	Health	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality	Landscape	Biodiversity
Meeting Affordable Housing need in its Entirety	Short	+	0/+	-	-	-	0	0	-	-	-	0	0	-	-	-	0
	Medium	+ / ++	0 / +	- / --	- / --	- / --	0	0	- / --	- / --	- / --	? / -	? / -	- / --	- / --	- / --	? / -
	Long	++	+	--	--	--	? / -	? / -	--	--	--	? / --	? / --	--	--	--	? / --
Local Plan Delivery Quantum and Rate of Affordable	Short	0 / +	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Medium	+	0	0	0	0 / -	0	0	0 / -	0 / -	0 / -	0	0	0	0	0 / -	0
	Long	+ / ++	0	? / -	? / -	-	0	0	-	-	-	? / -	? / -	? / -	? / -	-	0

It is necessary to consider possible methods for increasing affordable housing delivery.

Evidence shows that requiring a higher percentage of affordable housing would render sites financially unviable, and therefore non-deliverable.

Exceptions sites are not a realistic option to meet the scale of the need. Although they can be an invaluable source of localised supply to rural communities, the evidence of past delivery rates, suggests exception sites will not contribute more than a nominal amount to overall future need.

Therefore, the only realistic way to significantly increase affordable housing delivery would be to increase the total supply of housing. Based on Local Plan policies, affordable housing will come forward at a rate of between 20% and 40%, and then only on sites above a certain size threshold (5-15 dwellings). It is therefore estimated that to deliver the SHMA's identified affordable housing number would require a total housing delivery number of at approximately three times the current Local Plan 2033 housing number.

The challenges of meeting the current Local Plan 2033 housing target are already significant. Clearly the environmental and social impacts of three times the scale of growth would be phenomenal – unprecedented levels of greenfield development would be required, permanently altering the rural character, landscape and heritage of the District, as well as leading to a probable host of related detrimental environmental effects.

The assessment above tests the scenario of meeting 100% of affordable housing need. Meeting lesser proportions would of course have progressively less impact, although even the current Local Plan delivery quantum represents a significant sustainability challenge.

5.6 SA of Options: Relationship of New Residential Allocations to Existing Built Form /Settlement Boundaries

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Option 1: Allocate development sites anywhere and without regard to existing built form /settlement boundaries	++	-	-	-	+	-	-	?/-	-	0	0	0	0	-	?/--	?/-
Option 2: Only allocate development sites where adjacent to existing built form / settlement boundaries	+	+	+	+	-	+	+	0	0	0	0	0	0	0	0	0

Table 13: SA of Relationship of New Residential allocations to Existing Built Form / Settlement Boundaries

Commentary

Potential residential sites that do not abut existing settlements were effectively ruled out the HELAAA at an early stage as unsuitable. This approach is subject to sustainability appraisal in this section.

Overall objective 2 appears to be the much more sustainable option.

Restricting residential allocations to being either within or adjacent to existing settlements (Option 2) may lessen the supply of housing overall, so option 1 is more positive in respect of objective 1. Option 2 may also lead to a higher proportion of greenfield sites being developed, since fringe sites are typically greenfield, whilst opportunities unrelated to the existing settlement pattern (Option 1) may be more likely to be brownfield, for example on rural employment sites. For a similar reason, option 1 seems more likely to have negative economic effects (objectives 6 and 7) by increasing the risk and pressures for rural employment sites to change use to residential. Option 1 also facilitates residential development that is less accessible to key services and centres (objective 4), which has knock on negative consequences for air quality (objective 14).

Residential allocations forming an extension to existing settlement (option 2) may be better placed to take advantage of low-carbon energy opportunities such as district heating/CHP. Conversely more remote residential allocations (option 1) maybe more incentivised to implement decentralised renewable energy generation, and may find fewer local objections and obstacles to doing so. Reliance on the private car, and hence overall emissions, seem likely with option 1. There would also be increased pressure on waste and recycling collection facilities with option 1.

Long-term, loosening restrictions on the location of residential development (option 1) seems likely to accelerate negative effects on landscape and biodiversity. This may be initially via direct impacts, but in the longer term also lead to a deterioration of landscape quality and rural character, as well as increased development pressure on land intervening the settlement boundaries and the new rural residential development.

5.7 SA of Options: Residential Allocations within Areas of Outstanding Natural Beauty (AONB)

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Option 1: Allocate Development Sites within the AONBs and Candidate Areas	++	-	-	-	0	0	0	0	0/-	0	0	0	0	0	-	-
Option 2: Exclude the AONB from major development (consider Exception sites)	+	+	+	+	0	0/+	0/+	0	0	0	0	0	0	0	-	0/-
Option 3: Exclude the AONB from all development	-	+	+	++	0	0	0	0	0	0	0	0	0	0	++	+

Table 14: SA of Residential Allocations within AONBs

There are two AONBs that are partially located within Tandridge, the Surrey Hills AONB and the High Weald AONB, as well as candidate areas. Potential residential sites within the AONB areas were effectively ruled out the HELAAA at an early stage as unsuitable. This approach is subject to sustainability appraisal in this section.

Clearly option 1 would be most beneficial in terms of housing delivery (SA Objective 1), with option 3 performing the worst in relation to this objective.

However, option 1 would be the least beneficial in terms of SA objective 2 (health and wellbeing), by both reducing the landscape quality and recreational value of the AONBs, as well as locating housing in rural locations remote from medical services. However, allowing limited exception sites (option 2) may help address issues of rural social exclusion and deprivation so these factors.

Option 1 would also risk harm on the District's cultural heritage (SA Objective 3) as well as promoting unsustainable travel patterns from areas where services are more limited (SA Objective 4).

The most extreme appraisal outcomes relate to objective 15. Since AONBs are a landscape designation and the preservation of the natural beauty is a key purpose, option 1 risk serious negative effects, and option 3 is the most positive in respect of SA objective 15. Similarly, there would be knock on effects in relation to biodiversity (objective 16), though to a lesser extent since AONBs are primarily a landscape based, rather than ecological, designation.

5.8 SA of Options: Delivery Strategy Approaches

5.8.1 Background

The Council continues to evaluate the relative merit of different delivery strategy options as part of the process of 'Sustainability Appraisal'⁵, in order to ensure that potential environmental effects are given full consideration alongside social and economic issues.

The consideration of alternative options is also a legal requirement of the EU Strategic Environmental Assessment Directive⁶. Such consideration should include comparison of *"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, landscape 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."*

In preparing the Tandridge District Local Plan, alternative approaches have been identified and appraised as part of an iterative process. Initially, as part of the December 2015 Sustainability Appraisal, seven different approaches to future development within the District were initially considered. These approaches focused on consideration of various options concerned with the inclusion/exclusion of sites within/without inset settlements and at different tiers of the settlement hierarchy⁷. The SA is an iterative process and the 2015 options were based upon the understanding of the realistic options and evidence available at that time. However the numbers within the 2015 options cannot be considered directly comparable to subsequent options 7a to 8b. The latter are based upon a more detailed and well-developed evidence base.

The 2015 SA also already considered 'a large extension or new settlement' (approach 6) and both Blindley Heath and South Godstone were further considered as 'new or extended settlements' in the Sites Consultation and accompanying SA in 2016. However, neither of the approaches published in 2015, nor the Sites Consultation (2016) considered the New/extended settlement alongside wider development within the District but only as a concept or as a potential location on its own.

In order to inform the Local Plan Preferred Strategy, it was necessary to undertake further consideration of alternative approaches (7a, 7b, 7c, 8a and 8b). The five subsequent approaches can be summed up in Table 15. All five approaches consider higher levels of housing delivery, via a Garden Village together with some development in the wider District. Where individual settlements are referred to, it can be assumed that development would be considered both within the settlement and at fringe locations. The five approaches are:

- Approach 7a: Focus residential development on Tier 1 and 2 settlements, plus development of a 'Garden Village'; all at standard density. Intensification of all employment sites within the District, plus new sites alongside the Garden Village. Intensification of all employment sites within the District, plus new sites alongside the Garden Village.
- Approach 7b: Focus residential development on Tier 1 and 2 settlements, plus development of a 'Garden Village' - all at higher density (HD) – as high as 70 dwellings per hectare (dph). Intensification of all employment sites within the District, plus new sites alongside the Garden Village.
- Approach 7c: Focus residential development on Tier 1 and 2 settlements at standard density; plus development of a 'Garden Village' at higher density (HD). Intensification of all employment sites within the District, plus new sites alongside the Garden Village.
- Approach 8a: Focus residential development on Tier 1, 2 and 3 settlements, plus development of a 'Garden Village'; all at standard density. Intensification of all employment sites within the District, plus new sites alongside the Garden Village.
- Approach 8b: Tier 1, 2 and 3 settlements plus 'Garden Village' - all at higher density (HD). Intensification of all employment sites within the District, plus new sites alongside the Garden Village.

⁵ SA for Local Plans is a legal requirement, under the Planning and Compulsory Purchase Act (2004). It is also a requirement that SA is undertaken in-line with the procedures prescribed by the EU Strategic Environmental Assessment (SEA) Directive (2001), and as such SA can be said to incorporate SEA. SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising the positives.

⁶ DIRECTIVE 2001/42/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment

⁷ Tandridge District [Settlement Hierarchy](#) (November 2015)

In Table 15, the five approaches are set out in columns, with the potential sources of residential supply that may comprise each approach set out in rows. Existing settlements are ordered according to their status in the settlement hierarchy. Green cells indicate that a settlement formed part of the approach. The higher density (HD) referred to in approaches 7b, 7c and 8b can be taken to equate to as high as 70 dwellings per hectare, as explained in more detail in the sections below.

Table 15: Summary of SA Assessments of Delivery Approaches and Settlement Hierarchy

HIERARCHY	SETTLEMENTS	DELIVERY STRATEGY APPROACHES				
		SA of Preferred Strategy				
		Approach 7a Tier 1 and 2 settlements plus 'Garden Village'. Intensification of all employment sites within the District, plus new sites alongside the Garden Village.	Approach 7b Tier 1 and 2 settlements plus 'Garden Village' - all at higher density (HD). Intensification of all employment sites within the District, plus new sites alongside the Garden Village.	Approach 7c Tier 1 and 2 settlements at standard density; plus 'Garden Village' at higher density (HD). Intensification of all employment sites within the District, plus new sites alongside the Garden Village.	Approach 8a Tier 1, 2 and 3 settlements plus 'Garden Village'. Intensification of all employment sites within the District, plus new sites alongside the Garden Village.	Approach 8b Tier 1, 2 and 3 settlements plus 'Garden Village' - all at higher density (HD). Intensification of all employment sites within the District, plus new sites alongside the Garden Village.
New Garden Village			HD	HD		HD
Existing Commitments (Permissions)						
Urban Settlements (Tier 1)	Caterham on the Hill		HD			HD
	Caterham Valley		HD			HD
	Hurst Green		HD			HD
	Limpsfield		HD			HD
	Oxted		HD			HD
	Warlingham		HD			HD
	Whyteleafe		HD			HD
Semi-Rural Service Settlements (Tier 2)	Godstone		HD			HD
	Lingfield		HD			HD
	Smallfield		HD			HD
Rural Settlements (Tier 3)	Bletchingley					HD
	Blindley Heath					HD
	Dormansland					HD
	Felbridge					HD
	Old Oxted					HD
	South Godstone					HD
	South Nutfield					HD
	Tatsfield					HD
	Woldingham					HD

Note on Housing Numbers

Approach 7a: In this option the Garden Settlement numbers within Tandridge District are between 3,000 to 4,350. This broadly equates to what has been submitted by development interests, although not all would be deliverable within the Plan period. Development in tier 1 equates to 768 and in Tier 2 to 533 as set out in the Local Plan Policy TLP01. The density of all areas allocated on or within tier 1 and 2 settlements equates to approximately 30 dwellings per hectare, with densities in garden settlement options expected to be similar or slightly less to allow achievement of 'garden' settlement principles. All density estimates apply standard infrastructure ratios according to site size. Existing commitments equate to 2,334, which is also derived from TLP01.

Approach 7b: In this option existing commitments stay the same at 2,334. However higher densities are assumed on other sites. For example a standard density of 50 dph would be expected to see around 5,000 to 8,100 within a Tandridge garden settlement, around 1,050 from tier 1, and 850 from tier 2. A higher still density of 70 dph would equate to between 7000 and 11,400 within a Tandridge garden settlement, about 1,500 on tier 1, and about 1,200 on tier 2.

Approach 7c: In this approach a higher density garden settlement would deliver 5000 to 8100 at 50 dph; or between 7000 and 11,400 at 70dph. Development in tier 1 equates to 768 and in Tier 2 to 533 as set out in the Local Plan Policy TLP01. The density of all areas allocated on or within tier 1 and 2 settlements equates to approximately 30 dwellings per hectare. All density estimates apply standard infrastructure ratios according to site size. Existing commitments equate to 2,334, which is also derived from TLP01.

Approach 8a: This approach is the same numbers as approach 7a, with the addition of sites within or on the edge of tier 3 settlements. The inclusion of sites within or on the edge of tier 3 settlements is contrary to the Local Plan strategy and as a consequence they have not been subject to the green belt exceptional circumstances test. Therefore, a reliable estimate of potential is even more problematic than for other sources of supply. However applying a standard density estimate (30 dph) to all tier 3 suitable sites in the HELAA gives about 11,150 dwellings (after applying standard infrastructure ratios according to site size). Although these have not been subject to exceptional circumstance testing it is considered likely that the potential number would be very significantly reduced by a considerable margin.

Approach 8b: Approach 8b is the same as approach 7b in terms of numbers with the addition of sites within or on the edge of tier 3 settlements – also at higher density. As noted in the note on approach 8a above, the estimation of potential numbers at tier 3 settlements is problematic and unreliable. However, the 11,150 discussed in the previous paragraph equates to about 18,600 at 50 dph and 26,000 at 70 dph.

All the above estimates have applied the infrastructure ratios that informed the HELAA, which are as follows:

- Up to 0.4ha = same
- 0.4 to 2 ha = 82.5%
- 2 to 35 ha = 62.5%
- 35+ ha = 50%

There is a broad assumption that parts of a site not suitable for development on ecological, landscape or other grounds could generally be incorporated within areas of green infrastructure. However, this may not be possible in all cases, so this is a further reason why potential numbers may be over-estimated in the figures for approaches 7a to 8b above, particularly those which go above and beyond the current preferred strategy.

Note on the Green Belt

It is useful to understand the settlement hierarchy set out in Table 15 in the context of the Green Belt. All tier 1 settlements are currently inset from the Green Belt, as are two out of three tier 2 settlements (Lingfield and Smallfield). The third and final tier 2 settlement, Godstone, is currently washed over by Green Belt but has been recommended for inseting from the Green Belt in TDC Green Belt Assessments.

However, focusing on tier 1 and 2 settlements (as under options 7a, 7b and 7c) does not mean new development will avoid areas currently classified as Green Belt. Ongoing work on the Housing and Economic Land Availability Assessment (HELAA) indicates that the overwhelming majority of sites considered at such settlements are actually located on the fringes of the defined inset area, i.e. within the currently defined Green Belt. Although it is also important to note that in order to eventually proceed as development allocations it will be necessary for such sites to demonstrably pass the Green Belt exceptional circumstances test - leading to their eventual release from the Green Belt.

All tier 3 settlements are within the Green Belt except Woldingham, which is inset. In practice all sites considered at tier 3 settlements are within the Green Belt. This includes Woldingham where no sites within the inset area were considered in the HELAA.

5.8.2 SA of Delivery Strategy Options and Approaches

As the National Planning Policy Framework (NPPF) paragraph 7 outlines, there are three dimensions to sustainable development which are afforded equal weight: economic, social and environmental. The NPPF mirrors the requirements of Sustainability Appraisal which also considers these three dimensions. The three dimensions are reflected in the 16 SA objectives against which each approach has been assessed. The objectives were set out in the [2015 Sustainability Appraisal Scoping Report](#). The SA Framework, which relates the 16 objectives to the NPPF economic, social and environmental themes, as well as setting out 'decision-aiding questions' is reproduced at the end of this Appendix B.

The following tables assess the 'Delivery Strategy Approaches' against the 16 SA objectives. This is followed by discussion of the 16 objectives in turn, in light of the approaches that have been considered.

Table 16: SA of Approach 7a – Tier 1 and 2 Settlements plus 'New/extended settlement'

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport	P.Developed Land	Economics	Employment	Greenhouse Emissions & Low Carbon	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality	Landscape	Biodiversity
Short	+	0	0	0/+	0	+	+	?	?	?	0	0	0	0	0	?
Medium	+	+	-	?/+	?/-	++	++	?/+	?	?	?/-	?/-	?/-	?	-	?
Long	+ / ++	+	-	?/+	?/-	++	++	?/+	?	?	?/-	?/-	?/-	?/-	-	?

Table 17: SA of Approach 7b – Tier 1 and 2 Settlements plus 'New/extended settlement' – all at higher density

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport	P.Developed Land	Economics	Employment	Greenhouse Emissions & Low Carbon	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality	Landscape	Biodiversity
Short	+ / ++	0	0	? / +	0	+	+	?	?	?	0	0	0	0	0	? / -
Medium	+ / ++	-	- / --	? / ++	? / -	++	++	? / +	?	? / -	? / --	? / -	? / -	? / -	- / --	? / -
Long	++	-	- / --	? / ++	? / -	++	++	? / +	?	? / -	? / --	? / -	? / -	? / -	- / --	? / -

Table 18: SA of Approach 7c – Tier 1 and 2 Settlements at standard density plus 'New/extended settlement' at higher density

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport	P.Developed Land	Economics	Employment	Greenhouse Emissions & Low Carbon	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality	Landscape	Biodiversity
Short	+	0	0	? / +	0	+	+	?	?	?	0	0	0	0	0	?
Medium	+ / ++	0	-	? / +	? / -	++	++	? / +	?	?	? / -	? / -	? / -	? / -	-	? / -
Long	++	0	- / --	? / ++	? / -	++	++	? / +	?	? / -	? / --	? / -	? / -	? / -	-	? / -

Table 19: SA of Approach 8a – Tier 1, 2 and 3 Settlements plus 'New/extended settlement' – all at standard density

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport	P.Developed Land	Economics	Employment	Greenhouse Emissions & Low Carbon	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality	Landscape	Biodiversity
Short	+	0	-	0	-	+	+	?	?	?	?/-	?/-	?/-	0	?/-	?/-
Medium	+ / ++	-	- / --	0	? / --	++	++	? / -	?	?	? / -	? / -	? / --	? / -	- / --	? / -
Long	+ / ++	-	- / --	0	? / --	++	++	? / -	?	?	? / -	? / -	? / --	? / -	- / --	? / -

Table 20: SA of Approach 8b– Tier 1, 2 and 3 Settlements plus 'New/extended settlement' – all at higher density 'Maximum Capacity'

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport	P.Developed Land	Economics	Employment	Greenhouse Emissions & Low Carbon	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality	Landscape	Biodiversity
Short	+ / ++	0	-	0	-	+	+	?	?	?	? / -	? / -	? / -	? / -	? / -	? / --
Medium	++	-	--	0 / +	? / --	++	++	? / -	?	? / -	? / --	? / -	? / --	? / --	--	? / --
Long	++	- / --	--	0 / +	? / --	++	++	? / -	?	? / -	? / --	? / -	? / --	? / --	--	? / --

Detailed SA Objectives Appraisals

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

Approaches 7a, 7b, 7c, 8a and 8b all offer a significant boost to housing delivery compared to approaches 1-6 assessed in 2015. However, approach 7a is the least ambitious of the more recently assessed approaches and therefore does not score as positively for housing delivery as approaches 7b to 8b inclusive.

The inclusion of tier 3 settlements in approaches 8a and 8b would boost housing supply to some extent (see earlier discussion on page 164 on this point). Notwithstanding the negative impacts on rural character discussed under later objectives, it seems likely that applying higher densities to larger and higher tier settlements would lead to an even more significant boost to housing supply (see earlier discussion on page 164 for numbers implication). This explains the slightly more positive scores for approaches 7b and 7c compared to 8a under objective 1.

Clearly the most positive approach in simply boosting housing supply would be 8b, which not only includes tier 3 settlements, but applies higher densities across the board. As such 8b is the 'maximum capacity' scenario. However, the extent to which such numbers would be realistically achievable in light of other planning constraints is doubtful, and certainly not without negative consequences.

SA Objective 2: To facilitate the improved health and wellbeing of the whole population.

Population growth may increase the pressure on services and facilities leading to a detrimental impact on the health and wellbeing of the population. This has to be balanced by the fact that development in the right locations can, conversely, have a beneficial effect.

For example, a positive consequence of developing larger sites may be the ability to deliver additional services and facilities. The delivery of development on large sites has the potential to generate significant planning obligations that will provide additional community amenities, health facilities and natural greenspace that will all have a positive impact on the health and wellbeing of the population. This is particularly the case with the new/extended settlement.

Another example of how development locations can influence this objective is the siting of new development in locations accessible to existing facilities such as hospitals, GPs, dentists, open spaces and recreational facilities.

Overall approach 7a appears to be the most positive in this respect, by striking the right balance of locating at larger settlements which facilitate the above two factors; whilst avoiding less sustainable tier 3 settlements, and higher density development.

Higher density development can have mixed consequences. It may allow a higher proportion of the population to be accessible to health facilities, but it may limit access to the countryside, green spaces and even have negative consequences on wellbeing.

As such, approach 8b, which incorporates both smaller rural settlements and higher densities, appears likely to be the most negative approach in terms of health and wellbeing.

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

In terms of impacts upon recognised historic and archaeological assets (e.g. conservation areas, listed buildings and scheduled ancient monuments), it is difficult to judge at the strategic and non-site specific level. Although any development in close proximity to a historic or cultural asset should consider suitable design to mitigate any impact as far as possible.

However, in the broader sense of cultural heritage, the scale of development will clearly have negative urbanising impacts on a historically rural area.

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

There is a degree of uncertainty with objective 4, particularly related to the scale and location of the new/extended settlement. As a general rule though, a reasonable size Garden Village offers good opportunities to provide local services and reduce the need to travel, particularly if the new settlement can be located near or adjacent train services. This positive effect can actually be heightened by higher density development, where a critical mass of people may increase the viability of bus and train services.

Similarly higher order settlements tend to offer similar opportunities, although the effects are somewhat reduced on the settlement fringes where car dependency may be higher.

Generally, SA delivery strategy approaches 8a and 8b, which extend into tier 3 rural settlements, perform more poorly than 7a and 7b. This is simply due to the relative lack of services and public transport accessibility in smaller settlements, as demonstrated in the Council's Settlement Hierarchy background paper..

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

There is still a large degree of uncertainty regarding objective 5. The sites included within the approaches have not been determined and therefore the land use is unknown, but likely to be a mix of previously developed and greenfield.

Since the assessment considers the general concept of a 'Garden Community', rather than a specific location, a degree of uncertainty is inevitably reflected in the scoring.

For the remainder of Local Plan development located outside the garden village the majority of new development will almost inevitably be on greenfield sites. This is because most of the sites considered in the process are situated on the greenfield fringes of existing settlements. However, there are a handful of exceptions, for example tier 1 settlement Oxted contains brownfield areas within the inset area.

Overall though, the five approaches considered in this report all score fairly poorly in relation to SA objective 5, reflecting the predominantly greenfield nature of the choices. Approaches 8a and 8b score particularly poorly, since the inclusion of tier 3 rural settlements generally offers the least potential for building on previously developed land.

It is also important to recognise that the negative scores for SA objective 5 are to a large extent inevitable in a District such as Tandridge which does not have an industrial heritage or significant areas undergoing regeneration. Therefore, much development seems likely to be on greenfield land by virtue of the lack of alternative options.

SA Objective 6: To support economic growth which is inclusive, innovative and sustainable.

All five approaches currently being assessed offer a similar approach to economic growth by allowing for the intensification of all employment sites within the District, plus new sites alongside the new/extended settlement. There is no disparity in approaches for the economy, even though objectives are all proposing to deliver different amounts of housing. However, the later Section 5.9 of this Report provides a more detailed and in-depth investigation of economic options.

All approaches are in line with the findings of the Economic Needs Assessment 2015 as they seek to protect existing employment sites across the whole of the District and allow for intensification to meet the demands of an increased labour force. The development of a new settlement in an already prosperous area with good connections to London and Gatwick Airport, offers significant potential for high value economic growth in emerging sectors. Therefore, approaches 7a, 7b, 7c, 8a and 8b are all positive regarding this objective.

However, once an approach is confirmed as the preferred option, further work will be required to ensure that there is a balance between the number of houses and the number of jobs being delivered.

SA Objective 7: To provide for employment opportunities to meet the needs of the local economy.

The outcomes of the assessment regarding SA objective 7 are extremely similar to the outcomes for SA objective 6 since employment opportunities are intrinsically linked to economic growth. Particular employment opportunities will stem from town centre regeneration in Oxted and Caterham.

All five approaches currently being assessed offer a similar approach to employment opportunities, one that is on balance of probabilities likely to be extremely positive. The later Section 5.9 of this Report provides a more detailed and in-depth investigation of economic options., Once an approach is confirmed as the preferred option, further work will be required to ensure that there is a balance between the number of houses and the number of jobs being delivered.

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

Approaches 7a and 7b would support good access to sustainable transport. Approaches 8a and 8b, which include smaller and typically less accessible tier 3 settlements will be less able to support good access to sustainable transport. The main negative impact of approaches 8a and 8b in terms of unsustainable travel patterns would seem unavoidable were these approaches to be implemented. However, the difference with approaches 7a and 7b is marginal, given that all five approaches will see the bulk of development delivered from the same sources – namely a garden village and tier 1 and 2 settlements (although approaches 8a and 8b will also include tier 3 settlements).

There is much uncertainty regarding different development strategy options ability to reduce greenhouse gas emissions and move to a low carbon economy. This may be dependent both on national and local policies requirements for low carbon and renewable initiatives (both at the time of plan development and the time of future planning applications); as well as the detailed components of individual schemes.

In terms of renewable / low carbon energy generation, larger development sites are more likely to provide biomass fuelled heating systems or Combined Heat and Power (CHP) systems. This is most true of the new/extended settlement which forms a component of all five approaches (7a, 7b, 7c, 8a and 8b) under consideration, thus making the distinguishable differences between the options relatively minor. Solar power is increasingly prevalent nationwide, but can be applied to large and small schemes, although can be restricted by development schemes which cannot be orientated on a north-south axis, more often an issue for smaller sites than for larger.

However, whilst there are grounds for optimism regarding renewable and low carbon technology implementation, there are simply too many uncertainties at this stage to enable positive scores for this objective, which remains largely uncertain at this point. Effects of this objective are more likely to be felt in the medium and longer terms once a garden village is developed.

SA Objective 9: To use natural resources prudently.

The effects of this objective are largely still to be confirmed or neutral at this stage.

To increase the reuse of existing materials on sites a policy would be required to encourage the use and supply of sustainable products and reduce the use of primary resources. All new development, regardless of location and scale, would likely design-in some waste management facilities.

SA Objective 10: To adapt to the changing climate.

As the policies progress it will mainly be down to the detail of design issues that can be developed that will protect communities from the increased extremes of weather. It should be noted that flooding is dealt with separately in the next SA objective.

It is not possible to conclude significant effects (given that climate change mitigation is a global issue and the influence of the growth strategy promoted through the Local Plan will be minor). However, the higher densities within approaches 7b, 7c and 8b could potentially exacerbate the impacts of a heat wave, by reducing scope for urban greenspace and its cooling properties.

SA Objective 11: To reduce flood risk.

There are areas of fluvial flood risk (both flood zones 2 and 3) within the District, including alongside the River Eden and its tributaries. However, there is likely to be sufficient land outside of the fluvial flood zones to accommodate development.

Development also has the potential to increase surface water runoff rates which could increase surface water flood risk. Areas of surface water flood risk are both widespread and localised on a nationwide basis. Therefore all five approaches have some potential to see negative effects under this objective. However, the risk from run-off may be exacerbated where there are a high proportion of impermeable surfaces, more typically higher density environments. As a consequence, approaches 7b and 8b are a higher risk than 7a and 8a.

Once the delivery strategy has been chosen it is then necessary to carry out a flood risk assessment of each site to ensure that flooding is addressed. A thorough and comprehensive approach to the implementation of sustainable drainage systems (SuDS) will mitigate risks from development in the District.

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

Through consultation with waste water treatment companies any waste water capacity will be addressed as part of the ongoing plan process.

In terms of water efficiency, larger scale developments may enable higher standards of water efficiency; however, this is uncertain.

A further issue of consideration is the risk of surface water run-off pollutants entering hydrological systems. As with flood risk, this can generally be mitigated by implementation of sustainable drainage systems (SuDS). Appropriately designed SuDS can have pollutant-filtering properties in addition to flood prevention.

Overall, whilst the effects in relation to objective 12 seem likely to be neutral or be possible to mitigate, it is too early in the process to completely rule out negative risks at this stage. These apply to all approaches to some extent.

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

As all approaches involve the development of green field sites this would lead to a negative effect.

There are no sites located in mineral safeguarding areas so there is no risk of development sterilising the mineral resource.

The potential for land contamination is site-dependent, so has not been determined at this time. Brownfield sites are often more problematic in this respect. Former landfill areas also pose issues as well as agricultural areas in some circumstances such as widespread use of fertilizers. Generally contaminated sites would be remediated prior to development and adverse effects would be avoided.

The majority of land in the district is of Grade 3 agricultural land (good to moderate), for which there would inevitably be some loss from these approaches, more so with 8a and 8b which stray in to the smaller rural settlements (tier 3). This last point is the main distinguishing factor between the approaches being considered.

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

Air quality in Tandridge District is generally considered to be good, however, ongoing monitoring and evidence gathering is necessary to ascertain whether further development will have a detrimental impact.

Road movements are a big factor in air quality. Approaches 8a and 8b will deliver housing in more rural locations that is likely to increase the need to travel and dependency on the car for households to access employment and community infrastructure; resulting in a greater likelihood of negative effects in terms of air quality. Approaches 7a, 7b and 7c focus development around existing settlements to provide easy access to existing services and facilities, resulting in less car dependency and less likely air pollution.

Although a new settlement in a rural location, the new garden village is likely to be relatively self-contained. Therefore its air quality impacts are likely to be less severe in comparison to a decentralised pattern of development, particularly if the new/extended settlement is well designed to afford sustainable access to services and/or located on pre-existing bus route and train stations.

Although noise and light pollution have not been identified as an issue within Tandridge as a whole there are areas with localised issues and the selection of sites to deliver the approaches will need to consider the impact of the motorways and Gatwick airport on future development.

Noise and light pollution effects may be exacerbated the further development takes place from existing settlements, i.e. in relatively tranquil areas.

It is not possible to conclude significant positive effects on the basis that growth could still result in an increase in car travel locally (and possibly traffic congestion to some extent) and future development has the potential to increase light and noise pollution. Essentially, the conclusion of this appraisal is that the assessment of individual sites required to deliver the preferred approach needs to ensure that they support 'sustainable' patterns of travel and avoid areas that are subjected to noise pollution. However approach 8b which applies higher densities and encroaches into rural settlements appears likely to be the least sustainable in terms of objective 14.

SA Objective 15: To protect and enhance landscape character.

All approaches will deliver housing outside of the urban areas and on green field land. There is therefore a risk of negative impact on the surrounding landscape, subject to the detail of site selection.

Whilst all approaches will avoid development directly within the AONB landscape designations. However, development still has a risk of affecting the setting of an AONB (or candidate AONB) via views both in and out of the AONB. For this reason, the Surrey Hills AONB unit has noted the importance of ensuring building heights are consistent with those of a Surrey village, which in turn suggests higher densities would impact negatively upon landscape character of the wider area.

Development also need be mindful of the locally landscape designated 'Areas of Great Landscape Value' (AGLV).

Development that encroaches into the wider countryside generally may also have a negative impact, particularly where such encroachments take place in areas that have an established rural character. The impact upon settlement fringes would likely be most severe with approaches 8a and 8b, simply because they also include tier 3 settlements.

Background evidence, in the form of 'Landscape Capacity and Sensitivity Studies' should assist in informing final site decisions, in order to mitigate risk. It is therefore essential that the selection of sites carefully considers the impact that the development will have on the surrounding landscape.

SA Objective 16: To conserve and enhance biodiversity.

All approaches will involve the development of some greenfield land as a minimum, so some short-term detrimental impacts on the sites biodiversity are almost inevitable.

Site based Ecology Assessments provide invaluable background evidence to inform on-going work. It is essential that the site selection avoids development in sensitive locations. Even where sensitive locations are avoided, it will be imperative to secure on-site biodiversity enhancements as well as connectivity with wider habitat networks. Development can actually offer positive gains in these respects. However, higher density can limit the scope for on-site enhancements and net biodiversity gain, which may be exacerbated by smaller garden sizes and reduced green spaces. Conversely lower density development may require larger total land-take, increasing urbanising effects across a wider area.

Approach 7a seems to offer most scope to address this objective and 8b the least. However, as with many other objectives, effects are largely dependent on the sensitivity of site specific proposals.

Conclusions on Delivery Strategy Approaches

All the more recently assessed approaches (7a to 8b inclusive) will boost growth relative to the previously assessed approaches 1-6. This is due to approaches 7a to 8b inclusive including a garden village alongside development in the wider district. This is reflected in positive scores for objectives 6, 7 and 1.

Whilst it can be seen that approaches 7a, 7b, 7c, 8a and 8b all positively boost growth, it can be seen that those that apply higher densities (e.g. 7b and 8b) or extend development into tier 3 rural settlements (8a and 8b), start to promote growth at the expense of environmental considerations to a greater extent. The issues are such, for example impacts upon rural landscape and cultural heritage, that it is difficult to envisage mitigation measures that may address them. It is considered that the severity of effects would be proportionate to the density applied.

Therefore on balance, it is generally approach 7a (Tier 1 and 2 settlements plus 'Garden Village') is the most sustainable across a range of factors. Approach 7a represents a considerably higher level of development than approaches 1 to 6 assessed in 2015, whilst avoiding the worst of the more damaging negative impacts that may result from approaches 7b, 8a and 8b. Approach 7b also some positive aspects (Tier 1 and 2 settlements at standard density; plus 'Garden Village' at higher density), securing higher levels of housing delivery although a new garden village built at high density may impact negatively on established rural character, as well as infrastructure and the road network. Therefore, if higher densities were to be applied to the Garden Village this should be limited to the settlement core and/or around public transport nodes.

5.9 SA of Economic Options: Quantity and Strategy

The two options below both directly support emerging Policy TLP20 'Supporting a Prosperous Economy' and both relate to elements within it.

Table 21: SA of Quantum of Employment Provision

Quantum of Employment Provision	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Option 1: GL Hearn's Labour Demand Baseline scenario from Economic Needs Assessment Update (15.3ha of employment land)	0	0	0	0 / -	+	+ / ++	+ / ++	0	0 / -	0	0	0	0	0 / -	0	0
Option 2: GL Hearn's Growth Scenario from Economic Needs Assessment Update (22.5ha of employment land)	0	0	0 / -	0 / -	?	++	++	0	-	0	0	0	0	-	-	-
Option 3: Completions Trend Scenario from Economic Needs Assessment Update (4.8 ha of employment land)	0	0	0	-	+	0 / +	0 / +	0	0	0	0	0	0	0	0	0
Commentary	<p>Option 1 is positive in respect of SA objectives 6 and 7, although the degree to which it can guarantee the protection of employment sites is tempered by the provisions of the General Permitted Development Order. It would see almost all employment provision delivered via intensification of existing employment sites. Given their predominantly rural location, this is not especially beneficial to objective 4.</p> <p>Option 2 'The Growth Scenario' shows a need for 22.5 ha of employment land in order to support economic growth in the district in-line with the LEP's aspirations and maximise the district's economic attributes. Given the scarcity of employment sites within towns, this scenario would inevitably see greater impacts on rural areas, where the employment provision would be likely located.</p> <p>Option 3 delivers little employment provision (4.8ha). This would perform relatively poorly against objectives 6 and 7. It would also lead to out commuting by providing insufficient local jobs.</p>															

Table 22: SA of Economic Delivery Strategy

Economic Delivery Strategy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Option 1: Identify and protect key employment sites and intensify existing sites within the district.	0	0	0	0	++	++	++	0	0	0	0	0	0	0	0	0
Option 2: Identify and allocate new employment sites on undeveloped land or land currently in other uses.	0	0	-	0	--	++	++	0	-	0	0	0	0	0	-	0 / -
Commentary	<p>Consideration of economic delivery did already form part of the SA of overall 'Delivery Strategy Approaches'. However, the primary focus of overall 'Delivery Strategy Approaches' was perhaps inevitably on residential, and therefore it is considered useful to also draw out consideration of economic delivery matters separately as discrete options in themselves.</p> <p>The Economic Needs Assessment (2017), an update to the Economic Needs Assessment 2015, 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.</p> <p>It determined that in order to meet baseline need for employment growth, at least 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). It also identifies that this quantum can be met via intensification of existing sites within the District (Option 1). Therefore option 2, provides no additional economic benefits, whilst risking detrimental environmental effects across a range of issues.</p>															

5.10 SA of Options: Individual Settlements – their Status in the Strategic Settlement Hierarchy and its Implications for their Suitability for Growth

This assessment is on a settlement basis. As such, many of the objectives are not applicable as they can only be assessed on a site by site basis, or because they cannot influence the settlement hierarchy.

For the purposes of this assessment, objective 1 is based upon population, as a proxy for a settlement's capacity to provide additional housing. Larger scale growth would not generally be considered sustainable or proportionate where the existing host settlement population is low. So, the larger the size of the pre-existing host settlement, the greater the assumed capacity for additional growth.

Objective 2 is based upon presence and/or proximity to GP services as well as presence of chemists, open spaces and police station. Objective 4 is based on presence of key services as well as sustainable transport accessibility. Objective 7 is based on employment premises, retail services and broadband, while objective 6 also factors in relationship to economic growth areas, such as the M25 Corridor, Gatwick Diamond and Wandle Valley Corridor.

The only other objective considered relevant to a settlement wide assessment of settlement hierarchy status and suitability for growth is objective 11. For the purposes of this particular assessment, factors that influence the scoring are: AONB and candidate AONB (including setting), Areas of Great Landscape Value (AGLV) as well as general rural character and location, reliance on greenfield, etc.

More in depth discussion of the individual settlements is at Section 5.11 of this report.

Conclusions

The results of the Sustainability Appraisal assessment (see Table 23 below) validate the findings of the 'Settlement Hierarchy 2015' background evidence paper. Moreover the results validate the overall development strategy of the Local Plan 2033, identifying that Tandridge District contains a lot of settlements that cannot be considered either sustainable or suitable for growth. Such unsustainable settlements correlate to the tiers 3 and tiers 4 of the 2015 settlement hierarchy. Therefore the search for suitable sites is justified in focusing on tiers 1 and 2 settlements.

However, for the purposes of SA, the *investigation* of sites (see Sections 5.11) has extended to also include Tier 3 settlements to ensure that within them are no anomalous individual sites that could be considered sustainable.

Table 23: SA of Strategic Settlement Hierarchy and Suitability for Growth

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health and Wellbeing	Cultural Heritage	Transport	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Caterham on the Hill	++	+ / ++	N/a	+	N/a	++	++	N/a	N/a	N/a	N/a	N/a	N/a	N/a	-	N/a
Caterham Valley	++	++	N/a	++	N/a	++	++	N/a	N/a	N/a	N/a	N/a	N/a	N/a	-	N/a
Hurst Green	++	+	N/a	+	N/a	0	0	N/a	N/a	N/a	N/a	N/a	N/a	N/a	-	N/a
Limpsfield	+	+ / ++	N/a	0	N/a	0	0	N/a	N/a	N/a	N/a	N/a	N/a	N/a	- / - -	N/a
Oxted	++	++	N/a	++	N/a	++	++	N/a	N/a	N/a	N/a	N/a	N/a	N/a	- / - -	N/a
Warlingham	++	++	N/a	++	N/a	0	++	N/a	N/a	N/a	N/a	N/a	N/a	N/a	-	N/a
Whyteleafe	+	+	N/a	++	N/a	+	+	N/a	N/a	N/a	N/a	N/a	N/a	N/a	-	N/a
Godstone	+	+ / ++	N/a	+	N/a	+	+	N/a	N/a	N/a	N/a	N/a	N/a	N/a	-	N/a
Lingfield	+	+ / ++	N/a	++	N/a	+	++	N/a	N/a	N/a	N/a	N/a	N/a	N/a	-	N/a
Smallfield	+	+ / ++	N/a	+	N/a	+	+	N/a	N/a	N/a	N/a	N/a	N/a	N/a	-	N/a
Bletchingley	+	-	N/a	+	N/a	0	0	N/a	N/a	N/a	N/a	N/a	N/a	N/a	- -	N/a
Blindley Heath	0	- -	N/a	-	N/a	0	0	N/a	N/a	N/a	N/a	N/a	N/a	N/a	-	N/a
Dormansland	0	- -	N/a	+	N/a	0	0	N/a	N/a	N/a	N/a	N/a	N/a	N/a	- / - -	N/a
Felbridge	0	-	N/a	0	N/a	0	0	N/a	N/a	N/a	N/a	N/a	N/a	N/a	-	N/a
Old Oxted	- -	0	N/a	0	N/a	0	0	N/a	N/a	N/a	N/a	N/a	N/a	N/a	- / - -	N/a
South Godstone	0	- -	N/a	+	N/a	0	0	N/a	N/a	N/a	N/a	N/a	N/a	N/a	-	N/a
South Nutfield	0	- / - -	N/a	+	N/a	+	0	N/a	N/a	N/a	N/a	N/a	N/a	N/a	- / - -	N/a
Tatsfield	0	- / - -	N/a	-	N/a	-	0	N/a	N/a	N/a	N/a	N/a	N/a	N/a	-	N/a
Woldingham	0	- / - -	N/a	+	N/a	0	0	N/a	N/a	N/a	N/a	N/a	N/a	N/a	-	N/a
Tandridge	-	- -	N/a	-	N/a	0	0	N/a	N/a	N/a	N/a	N/a	N/a	N/a	- -	N/a
Chaldon	0	-	N/a	-	N/a	+	0	N/a	N/a	N/a	N/a	N/a	N/a	N/a	- / - -	N/a
Limpsfield Chart	-	- -	N/a	-	N/a	-	-	N/a	N/a	N/a	N/a	N/a	N/a	N/a	- / - -	N/a
Horne	-	- -	N/a	-	N/a	+	0	N/a	N/a	N/a	N/a	N/a	N/a	N/a	-	N/a
Outwood	- -	- -	N/a	-	N/a	-	-	N/a	N/a	N/a	N/a	N/a	N/a	N/a	-	N/a
Burstow	-	- -	N/a	- -	N/a	0	0	N/a	N/a	N/a	N/a	N/a	N/a	N/a	-	N/a
Chelsham	- -	0 / -	N/a	-	N/a	- -	-	N/a	N/a	N/a	N/a	N/a	N/a	N/a	-	N/a
Farleigh	- -	-	N/a	-	N/a	- -	-	N/a	N/a	N/a	N/a	N/a	N/a	N/a	-	N/a
Titsey	- -	-	N/a	- -	N/a	- -	-	N/a	N/a	N/a	N/a	N/a	N/a	N/a	- -	N/a
Crowhurst	- -	- -	N/a	- -	N/a	- -	-	N/a	N/a	N/a	N/a	N/a	N/a	N/a	-	N/a
Crowhurst Lane End	- -	- -	N/a	- -	N/a	- -	-	N/a	N/a	N/a	N/a	N/a	N/a	N/a	-	N/a
Domewood	-	- -	N/a	- -	N/a	-	-	N/a	N/a	N/a	N/a	N/a	N/a	N/a	-	N/a
Fickleshole	- -	-	N/a	- -	N/a	- -	-	N/a	N/a	N/a	N/a	N/a	N/a	N/a	-	N/a
Dormans Park	- -	-	N/a	- -	N/a	-	-	N/a	N/a	N/a	N/a	N/a	N/a	N/a	- / - -	N/a
Nutfield	- -	- / - -	N/a	-		0	0	N/a	N/a	N/a	N/a	N/a	N/a	N/a	- -	N/a

5.11 SA of Options: Individual Residential Sites

5.11.1 Consideration of Sites for Different Uses

This section considers sites for residential use. Site Options for other uses, including employment and gypsies and travellers are considered separately.

5.11.2 Classification of Sites

References for the residential sites, for example 'BLE 009' are cross-referred to the HELAA. The three letter code relates to the name of the settlement, e.g. BLE is Bletchingley.

5.11.3 Reasonable Options

The Sustainability appraisal considers 'reasonable options', on the basis described in this section.

The SA has only considered sites that the Housing and Economic Land Availability Assessment (HELAA) considers 'suitable'. In practice this actually means 'suitable for further consideration', since the HELAA contains further criteria to determine a site 'developable' or 'deliverable'.

As the HELAA states '*Suitability is a high level assumption about whether a site could be developed, not whether a site should or will be developed or allocated*'. The HELAA's definition of suitability included physical problems or limitations of the site or immediate surroundings such as:

- Whether the site could be accessed;
- Whether topography or ground conditions would prevent development;
- Locational suitability; and
- Whether a site was a suitable size or could deliver an appropriate yield.

Position in Settlement Hierarchy: If a site was at a settlement categorised as a limited or un-serviced settlement (tier 4 in the settlement hierarchy), it was seen as being unsuitable on grounds of location and would have been ruled out on such grounds. Therefore only sites within or adjacent to Tier 1, 2 or 3 settlements have been subject to SA. That said, the SA has independently found Tier 3 settlements to be unsustainable locations (see section 5.10). Nonetheless, a further cross-check of individual sites within or adjacent to tier 3 sites has been undertaken for completeness, though the SA and Green Belt Exceptions Testing confirm the overall conclusion that tier 3 and 4 settlements do not provide environmentally acceptable or sustainable opportunities, either at site or at settlement level.

Green Belt: The HELAA explains that sites could be considered 'suitable' even if they are within the Green Belt. National planning policy is clear that the Green Belt should only be altered in 'exceptional circumstances'. Green belt is not a factor in the pre-defined SA Framework Objectives agreed across East Surrey local authorities. Sites within the Green Belt have been assessed but no recommendation about alterations to the Green Belt boundary have been made and green belt matters are not part of the SA Framework, or the decision aiding questions which inform the sixteen framework objectives. Green Belt boundaries can only be altered through the preparation of a Local Plan and it is only through that process, and on reflection of the wider evidence base, that any decision regarding alterations to the Green Belt can be made. Therefore it is important to note that sites could have failed the green belt exceptions test and not be considered developable/deliverable, without this being reflected in their SA assessment scores.

Scale: As part of the suitability assessment and in accordance with both the PPG and the adopted methodology, the HELAA only considers sites and broad locations capable of delivering five or more dwellings or economic development on sites of 0.25ha (or 500m² of floor space) and above. If it was apparent at the desktop stage that sites would not be able to satisfy these criteria, they would be considered 'non-qualifying' and no further consideration of them would take place. However, they have been kept on the file for the purposes of considering whether there is a potential supply of windfall development, and in case site sizes or circumstances change when the HELAA is reviewed in the future.

Settlement Boundaries: Sites not adjacent to a settlement boundary were not generally considered suitable. Defining appropriate settlement boundaries is important in identifying the point of transition between the built form of a settlement and the surrounding countryside. In addition, the boundary also serves to preserve the setting of existing settlements from inappropriate development and control unchecked and unplanned outward sprawl. Within the Local Plan, defined settlement boundaries are established for urban, semi-rural and rural

settlements (Tier 1, 2 and 3). However, this does not mean that every tier 3 settlement has been considered since some (Old Oxted, Woldingham) did not have any reasonable sites identified in the HELAA process.

5.11.4 Sustainability Appraisal Process

Sites were thoroughly assessed initially as part of the SA of the Regulation 18 Sites Consultation. However, as the SA of the Regulation 18 Sites Consultation stated on page i 'Since preparing the appraisal Tandridge District Council have prepared additional site-by-site ecology and landscape evidence, which was not available for use in this appraisal.' Therefore it is necessary to supplement the existing SA assessment with further consideration of latter evidence. This is particularly in relation to ecology and landscape which have subject to further detailed site-specific evidence work that has been fundamental to informing site selection in the Plan. The subsequent landscape and ecology assessment work has been scored in the SA on the following basis.

Table 24: Key to Updated Landscape and Ecology Scores

KEY TO SA LANDSCAPE SCORES		KEY TO SA ECOLOGY SCORES	
++	Major Landscape Improvement measure	++	Ecological Allocation - i.e new nature reserve
+ / ++	Minor Landscape Improvement measure	+ / ++	Major Ecological Gains.
+	High/very high or Urban (Landscape Capacity in Landscape Assessments)	+	More significant gains
o / +	High (Landscape Capacity in Landscape Assessments)	o / +	Minor ecological gain
o	Medium/High (Landscape Capacity in Landscape Assessments)	o	Ecologically Suitable OR Built Up Area (Ecological Assessments)
o / -	Medium (Landscape Capacity in Landscape Assessments)	o / -	Majority Ecologically Suitable (Ecological Assessments)
-	Low/Medium (Landscape Capacity in Landscape Assessments)	-	Sensitive - Minority Ecologically Suitable OR Sensitive - Special Design and Mitigation (Ecological Assessments)
- / - -	Low (Landscape Capacity in Landscape Assessments)	- -	Ecologically Unsuitable (Ecological Assessments)
- -	negligible/low (Landscape Capacity in Landscape Assessments)	- -	In Nature Reserve, SSSI.

Where a site has received a '-' score (or lower) for landscape or ecology this has generally resulted in the site's rejection. However, a score of 'o/-' (or higher) has not led to a site's rejection. Ecology and landscape evidence has also informed the Local Plan assessment of developable area and site capacity within the Local Plan, as well as mitigations on a site by site basis. Through the sites consultation process parties were given the opportunity to challenge the ecology and landscape assessments.

It has also proven necessary to update scores in relation to SA Objective 9 (Natural Resources) and SA Objective 13 (Contamination & Soils) to correct an earlier error from the Regulation 18 Sites Consultation. Agricultural land quality had been incorrectly assessed as part of objective 9, when in fact the pre-established SA Framework stipulates it is part of objective 13. This has resulted in changes to both objectives 9 and 13. However it is important to note that this has not make any material difference to outcomes, merely arranges existing and understood evidence in a manner consistent with the SA framework.

5.11.5 SA Commentary, Mitigations & Conclusions

In the following sections each site is considered in tables which are ordered by settlement. The final column is a summary entitled 'SA Commentary, Mitigations and Conclusions'. It is important to note that there is a 'Commentary' element to this section, as well as a 'Conclusion' and the assessment of a site balances and weights both pros and cons. Acknowledgement of a constraint may equally apply to a preferred site as to a rejected site, but a weighted balance of considerations has informed the final conclusion.

5.11.5 Bletchingley

Bletchingley was identified as a 'Rural Settlement' (Tier 3) in the Council's Settlement Hierarchy (2015).

Bletchingley is a historic village, with records stretching back to the Domesday Book (1086), where it was referred to as 'Blachingelei'. Today it has a population of approximately 2,600.

Bletchingley has strategic road access, including a bus services which run along the A25. It has no train station, with the nearest being South Nutfield some 2.6km to the south-west. At its historic core, Bletchingley is served by a range of shops, including a post office, public houses and good recreational and community facilities. It also has a primary school and some local employment opportunities. It does not have a large range of services. The nearest GP surgery to Bletchingley is Pond Tail Surgery located in Godstone, approximately 2.5km to the east, although this may relocate to the new Garden Settlement in the latter half of the plan period making Bletchingley less accessible to health services. Bletchingley has a Village Primary School (formerly St Catherine's Primary School)⁸. The closest Secondary School is the Warwick School, 4.2km to the west.

At the centre of the village is the Bletchingley Conservation Area, designated in 1969. The conservation area contains 57 listed buildings under 37 separate listings. The area is also an area of high archaeological potential. To the south west of the conservation area is Bletchingley Castle Scheduled Monument. Just north of the village is an area safeguarded for minerals. The village is situated on a mix of grade 3 and grade 4 agricultural land. Just south of the village is an AONB candidate area.

Bletchingley is a Neighbourhood Centre in the Retail Hierarchy. It has reasonable proximity to a cluster of employment sites east along the A25 at Godstone and around Nutfield. Brewer Street employment area, just north of the village is considered suitable for expansion/intensification and is classed as an 'Important Employment Areas' in the Plan.

The Surrey Hills AONB is situated 1.5km north of the village. Bletchingley abuts the Surrey Hills AONB Candidate Area which is located to the south. In addition, the area is classed as an 'Areas of Great Landscape Value'.

The housing sites in Bletchingley are clustered on the northern urban edge of Bletchingley. All Bletchingley sites are located within Flood Zone 1 and as such are at minimal risk of flooding. However, they are located within a groundwater source protection zone.

Within this 2018 SA, Section 5.10 the 'SA of Options: Individual Settlements – their Status in the Strategic Settlement Hierarchy and its Implications for their Suitability for Growth' supports the conclusion that Bletchingley is not a particularly sustainable location for growth.

Table 25: Bletchingley Sites - Key Details, Commentary and Conclusions

BLETCHINGLEY				
Site	Address	Current Use	Proposed Use	SA COMMENTARY, MITIGATIONS & CONCLUSION
BLE 002	Five Acres, Little Common Lane, Bletchingley RH1 4QG	Single residential property, with associated outbuildings and extensive garden land	Residential	Greenfield site. Northern half is within an area identified in the Surrey Minerals Plan (2011) for safeguarding of an area for mineral development. Partly BAP Priority Habitat (deciduous woodland). Grade 3&4 agricultural land. Within groundwater source protection zone III (Total Catchment). Nearby AONB candidate area to south. Within Area of Great Landscape Value (AGLV). Tier 3 (Not in a sustainable settlement). Rejected.
BLE 016	Land to the rear of Stychens House	Large residential dwelling with an extensive garden	Residential	Greenfield site within conservation area. Nearby AONB candidate area to south. Within groundwater source protection zone III (Total Catchment). Grade 3&4 agricultural land. Within Area of Great Landscape Value (AGLV). Rejected - Tier 3 (Not in accordance with the Preferred Strategy).
BLE 019	Land rear of Church Court Farm, Bletchingley, RH1 4LP	Vacant grassland, agricultural land, manicured gardens and woodland	Residential	Greenfield site which abuts and slightly overlaps conservation area. Partially wooded. Within groundwater source protection zone III (Total Catchment). Nearby AONB candidate area to south. Grade 3 Agricultural land. Wholly in Biodiversity Opportunity Area. Within Area of Great Landscape Value (AGLV). Rejected - Ecology and Tier 3 (Not in a sustainable settlement).
BLE 020	Land rear of Clerks Croft, Bletchingley RH1 4LH"	Open land.	Residential	Greenfield site which abuts conservation area. Within groundwater source protection zone III (Total Catchment). Nearby AONB candidate area to south. The northern half of the site is within an area identified in the Surrey Minerals Plan (2011) for safeguarding of an area for mineral development. Grade 3 Agricultural land. Wholly in Biodiversity Opportunity Area. Within Area of Great Landscape Value (AGLV). Contaminated land risk (former hospital and workhouse). Rejected - Tier 3 (Not in a sustainable settlement) and Landscape
BLE 022	Land adjacent to Five Acres, Little Common Lane	Woodland	Residential	Greenfield site comprising BAP Priority Habitat (deciduous woodland). Within groundwater source protection zone III (Total Catchment). Abuts conservation area. Nearby AONB candidate area to south. Within Area of Great Landscape Value (AGLV). Grade 4 agricultural land. Rejected - Landscape, Tier 3 (Not in a sustainable settlement).

Table 26: Bletchingley Sites – Assessment Matrix

Site	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport and Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
BLE 002	++	-	-	-	-	0	-	0	--	0	+	-	-	-	0/-	0/-
BLE 016	+	-	-	-	-	0	-	0	-	0	+	-	-	-	0	0/-
BLE 019	++	-	-	-	-	0	-	0	-	0	+	-	-	-	0/-	-
BLE 020	++	-	-	-	-	0	-	0	--	0	+	-	--	-	--	0/-
BLE 022	+	-	-	-	-	0	-	0	-	0	+	-	0	-	-/--	--

It can be concluded that no site within Bletchingley can be considered suitable, on balance of considerations.

5.11.6 Blindley Heath

Section 5.13 assesses Blindley Heath as a large scale garden settlement, whilst this section assesses individual sites scope to be developed in their own right in the event of Blindley Heath not being the preferred locations for the garden settlement.

Blindley Heath has an approximate population of 1,100 and was identified as a 'Rural Settlement' (Tier 3) in the Council's Settlement Hierarchy (2015).

Access to facilities and amenities is limited in Blindley Heath, with no local convenience stores and no primary or secondary schools within a satisfactory distance. The nearest GP surgery to Blindley Heath is The Lingfield Practice, located at Lingfield, approximately 3.5 km to the south east. Blindley Heath relies on services from elsewhere to meet need. It is anticipated that residents of all of the sites in Blindley Heath would frequently drive to larger towns to access the broader range of facilities and amenities and for commuting to work. As such, these sites have the potential to adversely affect air quality in these towns. These are all factors that reduce its sustainability in respect of piecemeal development quite significantly

Godstone train station is 2.5km to the north of Blindley Heath, which is beyond usual walking distance but could be accessed by car. There are regular bus stops along Eastbourne Road, which is adjacent to the combined area west of Blindley Heath.

There are several existing employment sites in the immediate vicinity – albeit none considered suitable for expansion/intensification.

Blindley Heath is situated within the Low Weald Farmland Landscape Character Area, and the Grade II listed Church of St John the Evangelist forms the centre of Blindley Heath. Blindley Heath SSSI and LNR is to the south east of Blindley Heath village.

Within this 2018 SA, the 'SA of Options: Individual Settlements – their Status in the Strategic Settlement Hierarchy and its Implications for their Suitability for Growth' supports the conclusion that Blindley Heath is not a particularly sustainable location for growth.

On the basis of considering their individual development (as opposed to inclusion within a wider garden settlement), It can be concluded that no site within Blindley Heath can be considered sustainable, on balance of considerations.

Relationship to Garden Settlement

The main sites within the area considered for a new garden community are as follows BHE 002, BHE 007, BHE 010, BHE 013, BHE 015, BHE 017 (source HELAA).

Table 27: Blindley Heath Sites - Key Details, Commentary and Conclusions

BLINDLEY HEATH				
Site	Address	Current Use	Proposed Use	SA COMMENTARY, MITIGATIONS & CONCLUSION
BHE 002	Dairy Farm, Cottenhams, Blindley Heath	Farmland	Residential	Large area to the east of Blindley Heath. Areas of FZ2/3 and surface water flooding across site. Grade 3 agricultural land. SSSI 0.5km to south. Rejected - Rural Character, Tier 3 (not a sustainable settlement).
BHE 010	Land adjacent Blue Anchor Farm, Blindley Heath	Farmland and property	Residential	Potential to affect the setting of the Grade II listed Church of St John the Evangelist. Grade 3 Agricultural land, bounded by trees, woodland and hedgerows. SSSI 0.5km to south. Rejected - Rural Character, Tier 3 (not a sustainable settlement) + Ecology
BHE 013	Little Haven, Byers Lane, Blindley Heath	Residential house and garden	Residential	Separated from any settlement, but adjacent area considered for Garden Settlement Grade 3 agricultural land. Rejected - Not adjacent existing settlement, rural character, Tier 3 (not a sustainable settlement) and Landscape factors.
BHE 015	Land at Heath View and Maynards, The Common, Blindley Heath	Paddock with associated residence.	Residential	Patches of surface water flooding with FZ2/3 off site. SSSI off-site to south. There is a Grade II listed building to the south west of the site, although the site boundary does not include this property. Grade 3 agricultural land. Rejected - Rural character, Tier 3 (not a sustainable settlement)
BHE 017	Parkwood Industrial Estate	Industrial storage	Housing/Employment	Significant almost total coverage with surface water flooding. Industrial/storage use. Rejected - Tier 3 (not a sustainable settlement)
BHE 018	High Lawns and Hillside, Eastbourne Road	Residential and gardens	Residential	Grade 3 agricultural land. Rural character. Rejected - Tier 3 (not a sustainable settlement)
BHE 019	Dippen Hall, Eastbourne Road	Office and garden	Residential	Office use. Adjacent tertiary river (underground). Grade 3 agricultural land. Existing hedges to the south and east of the site offer only partial screening of the site. A public bridleway passes up the eastern side of the site and it is anticipated that views from this path would be adversely affected. Rural character. Rejected - Tier 3 (not a sustainable settlement)

Table 28: Blindley Heath Sites - Assessment Matrix

Site	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport and Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
BHE 002	++	-	-	--	-	0	-	0	-	0	-	?/-	-	-	0	0/-
BHE 010	++	-	-	--	-	0	-	0	-	0	+	0	-	-	0/+	-
BHE 013	+	-	0	--	+	0	-	0	-	0	+	0	-	-	-	0/-
BHE 015	++	-	-	--	-	0	-	0	-	0	0	?/-	-	-	0/-	0/-
BHE 017	+	-	-	--	+	0	--	0	-	0	-	?/-	-	-	0	0
BHE 018	+	-	-	--	-	0	-	0	-	0	+	?/-	-	-	+	0/-
BHE 019	+	-	-	--	-	0	-	0	-	0	+	?/-	-	-	0/+	0

It can be concluded that no site within Blindley Heath can be considered suitable, on balance of considerations.

5.11.7 Caterham (Including Caterham on the Hill and Caterham Valley)

Caterham was identified as an 'Urban Settlement' (Tier 1) in the Council's Settlement Hierarchy (2015). It comprises Caterham Valley and Caterham on the Hill.

Caterham is well served by shops and services, including GP services, primary schools and a secondary school. Within the Retail Hierarchy, Caterham is defined as one of two 'Town Centres', the highest level of the retail hierarchy in Tandridge (The other Town Centre is Oxted). In addition, Caterham on the Hill is defined as a 'Local Centre', and Caterham Westway is a 'Neighbourhood Centre'. Retail and services provide local employment. In addition, the Strategic Employment Site 'Godstone Road Business Centre' is located on the edge of Caterham in Whyteleafe (and is identified as suitable for expansion/intensification), and the Important Employment Site 'Paddock Barn Farm' is located just south of the town. Access to employment opportunities is good, with rail services to London and the south east mean wider employment opportunities are also easily accessible.

Access to public transport is very good in Caterham, with Caterham train station in a central location and Whyteleafe South Station and Upper Warlingham Station both also accessible. Caterham Station is at the end of the Caterham line and provides services to London Victoria and London Bridge. Upper Warlingham is on the separate Oxted line, which provides services further south through East Grinstead and Uckfield. Caterham also has an extensive bus network throughout the town. The very good access to public transport in Caterham would be expected to minimise the use of private car, benefitting local air quality. Caterham is identified for a number of transport related improvements in the IDP, including traffic calming and public realm improvements related to the Caterham Masterplan, as well as Wasps Lodge capacity improvements. The IDP also identifies new multi-use sports hall and community hall floorspace, as well as the upgrade of Town End amenity green space to a park and recreation ground.

There are two conservation areas in the town – Kenley Aerodrome and Caterham Barracks. There are two scheduled monument listings at Kenley Aerodrome. Each listing is for World War II fighter plane pens, of which there are 11 in total between the two listings. There are Grade II listed buildings scattered throughout Caterham. The most notable cluster is around Caterham Dene Community Hospital, in which area is the Grade I listed Church of St Lawrence.

The majority of Caterham is within Ground Water Protection Zone 2, with the most southerly areas in Zone 3. The urban area of Caterham is within the 'Major Aquifer High' Groundwater Vulnerability Zone and the rural areas within the 'Major Aquifer Major Aquifer Medium' Groundwater Vulnerability Zone and as such there is a potential risk to groundwater quality.

There are areas at risk of flooding in Caterham Town. The risk is from both fluvial and surface water flooding. Caterham Valley includes areas within Flood Zones 2 and 3 – land with the highest probability of flooding, as defined by the Environment Agency. In addition there are areas of high probability of surface water flooding within Caterham Valley and Caterham-on-the-Hill. Most recently, in June 2016 a flash flood occurred in Caterham on the Hill and Caterham Valley. The flooding incident overwhelmed the local road and drainage infrastructure resulting in internal and external property floods. Many of the internal property floods included sewage. There was also a 2013/2014 flood event which had significant impacts within Caterham Valley – flooding properties along Stafford Road. Local flood defences will benefit from two schemes that are high priority in the Infrastructure Delivery Plan, namely the Caterham Bourne and the Caterham Hill Flood Alleviation Schemes.

Caterham Valley abuts the Surrey Hills AONB which is located to the east. Additional areas to the west of the town are classed as 'Areas of Great Landscape Value'. Woldingham & Oxted Downs SSSI is about 4km south-east of Caterham Valley centre, while Quarry Hangers SSSI is a similar distance away to the south-west. The boundary of the Mole Gap to Reigate Escarpment Special Area of Conservation is about 8.7km away from Caterham Town at its nearest point.

Within this 2018 SA, Section 5.10 'SA of Options: Individual Settlements – their Status in the Strategic Settlement Hierarchy and its Implications for their Suitability for Growth' supports the conclusion regarding that Caterham is a settlement that can be considered a sustainable location for growth.

Caterham Masterplan SPD

Caterham was given further consideration as part of the Caterham Masterplan SPD (March 2018)⁸. This regeneration initiative will be a source of housing and employment land supply. The Local Plan will have a specific policy on the Caterham Masterplan, which has itself been subject to SA as part of this report (see section 5.17).

The Caterham Masterplan (March 18) included a supporting SEA/SA which can be seen on the Council's website here <http://www.caterham-masterplan.org.uk/>

The Caterham Masterplan only considered the central town centre areas of Caterham on-the Hill and Caterham Valley. Therefore the majority of sites considered in the HELAA were not part of the Caterham Masterplan. In practice, the Caterham Masterplan identified broad opportunities for town centre regeneration, so the SEA assessed wide areas comprising multiple sites on that basis.

⁸ <http://www.caterham-masterplan.org.uk/>

Table 29: Caterham Sites -Key Details, Commentary and Conclusions

CATERHAM				
Site	Address	Current Use	Proposed Use	SA COMMENTARY, MITIGATIONS & CONCLUSION
CAT 004	Former Officers Mess, Kenley Aerodrome	Aerodrome, former officers mess	Residential	The former Officers Mess at Kenley Aerodrome is a sizable Grade II listed building. The majority of the site falls within the Kenley Airfield Conservation Area. Ancient woodland and TPOs on site. Groundwater source zone. Possible contamination - radio technology research history. Heritage and Landscape concerns - Rejected.
CAT 007	156-180 Whyteleafe Road, Caterham	Former reserved housing land	Residential	Groundwater source zone. Sustainable on balance of considerations. Allocated
CAT 016	Land at Godstone Road, Caterham	Field	Residential	Some noise generated by adjacent by-pass. AONB lies immediately to the east and within 2km of SSSI. Groundwater source zone. Rejected - Ecology
CAT 019	Caterham Reservoir, Stanstead Road	reservoir, one staff house and former landfill	Residential	Southern section former landfill - possible contamination issues (SA objective 13). Covered reservoir on site. Groundwater source zone. Failed Green Belt exceptional circumstances test
CAT 022	Essendene Park, Whyteleafe Road	Grazing paddock and woodland	Residential	Partially wooded site, including TPO. Groundwater source zone. Loss of greenspace enclosed within wider urban area may exacerbate heat island effects (Objective 10). Rejected - Landscape & Ecology
CAT 029	Burntwood Lane, Caterham	Agricultural	Residential	Mature trees at frontage. Close to SNCI/ancient woodland. There is an area at risk of surface water flooding running north to south through the centre of the site. Groundwater source zone. Rejected - Landscape + failed Green Belt exceptional circumstances test.
CAT 038	Land at Waller Lane, Caterham	Residential, garden and woodland	Residential	Wooded site with partial TPO coverage. Natural green corridor with wider connectivity. Access to highways standards may present a difficulty. Groundwater source zone. Loss of greenspace enclosed within wider urban area may exacerbate heat island effects (Objective 10). Rejected - Ecology and failed Green Belt exceptional circumstances test.
CAT 039	Surrey National Golf Club	Golf Club	Residential	Loss of recreational facility. Includes woodland, some of it ancient, and ponds (both BAP priority habitats). Public Rights of Way on-site. Groundwater source zone. Rejected - Landscape
CAT 040	Land off Salmons Lane West, Caterham	Former Kenley Aerodrome land, now disused.	Residential	Within conservation area and contains listed buildings. Groundwater source zone. Will require sensitive design. Sustainable on balance of considerations. Allocated
CAT 041	Maybrook House, Godstone Road, Caterham	Office block	Residential	Employment uses. Groundwater source zone. Received Planning Permission.
CAT 042	Land to the East of Roffes Lane	Paddocks and grazing	Residential	Green lung site Bounded by hedgerows. Groundwater source zone. Rejected - Landscape & Ecology
CAT 044	Land at Fern Towers, Harestone Hill	Garaging	Residential	Car parking, brownfield. Groundwater source zone. Allocated
CAT 060	148 Salmons Lane, Caterham	Residential, gardens	Residential	Enclosed by mature trees and TPO near access point. On southern edge of Kenley Aerodrome and adjacent to conservation area so heritage considerations. Groundwater source zone. Rejected - Ecology, and failed Green Belt exceptional circumstances test.
CAT 063	Land at Chaldon Common Road	Farmland and one detached house	Residential	Urban fringe greenfield site adjacent to ancient woodland. Possible contamination (former pits) on northern half. Groundwater source zone. Failed Green Belt exceptional circumstances test.
CAT 078	de Stafford School, Burntwood Lane, Caterham	Private school fields	Residential	Scrubland. The site's roadside boundaries comprise a thick hedge and tree rows, some of which are covered with TPOs. Groundwater source zone. Rejected - Ecology, and failed Green Belt exceptional circumstances test.
CAT 079	Hallmark House, 2 Timber Hill Road, Caterham, Cr3 6LD	office	Residential	Adjacent to commercial hub. Part of the site which borders the road is at risk of surface water flooding and this will need to be considered. Groundwater source zone. Forms part of the Caterham Town Centre (Policy TLP28).
CAT 081	Coulsdon Lodge, Coulsdon Road, Caterham	redundant care home	Residential	Thick tree belt at boundaries with TPOs that will require careful consideration, including of root protection areas. Groundwater source zone. Allocated, justified as urban site.
CAT 085	Rear area of 18 Rook Lane and 24 Rook Lane, Chaldon	Open paddock.	Residential	Not directly adjacent to settlement boundary, but adjacent to CAT 039 (Surrey Golf Club) which is. Trees. Groundwater source zone. Rejected - Ecology

Table 30: Caterham Sites Assessment Matrix

Site	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport and Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
CAT 004	++	++	--	++	+	0	+	0	+	0	+	-	-/--	+	--	-
CAT 007	++	++	-	++	-	0	+	0	+	0	+	-	-	+	0/+	0/-
CAT 016	++	++	-	++	-	0	+	0	+	0	+	-	-	+	0/-	--
CAT 019	++	+	0	++	-	0	+	0	+	0	+	-	--	+	0/+	0/-
CAT 022	++	++	-/--	++	-	0	+	0	+	0/-	0/+	-	-/--	+	-/--	-
CAT 029	++	++	-	++	-	0	+	0	+	0	+	-	-	+	-	0/-
CAT 038	++	++	-	++	-	0	+	0	+	0/-	+	-	-	+	0/-	-
CAT 039	++	++	-	++	-	0	+	0	+	0	+	-	-	+	-/--	0/-
CAT 040	++	++	--	++	+	0	+	0	+	0	+	-	-	+	0/-	0/-
CAT 041	+	++	-	++	+	0	+	0	+	0	+	-	+	+	0	0
CAT 042	++	+	0	++	-	0	+	0	+	0	+	-	-	+	-/--	--
CAT 044	+	++	0	++	+	0	+	0	+	0	+	-	+	+	+	0
CAT 060	+	+	--	++	+	0	+	0	+	0	+	-	-	+	0/+	-
CAT 063	++	+	-	++	-	0	+	0	+	0	+	-	--	+	0/-	0/-
CAT 078	+	++	-	++	-	0	+	0	+	0	0/+	-	+	+	0/-	-
CAT 079	+	++	0	++	+	0	-	0	+	0	0	-	-	+	+	0
CAT 081	+	++	0	++	0/+	0	+	0	+	0	+	-	+	+	+	-
CAT 085	+	++	-	++	-	0	+	0	+	0	+	-	+	+	0/-	-

5.11.8 Domewood

Domewood has a population of around 700 and is a 'limited and un-serviced settlement' (Tier 4) in the Tandridge settlement hierarchy. However, Domewood sites merit inclusion by virtue of being adjacent to Copthorne in Mid Sussex DC, which is a Tier 2 settlement ('Local Service Centre') in the Mid Sussex District Plan 2014 to 2031.

It has very limited service provision - no shops, education or medical services. However, it does have direct access to the strategic road network and bus services connecting to East Grinstead. The nearest train stations are East Grinstead (5.2km) and Three Bridges Station (7.3km) Domewood is well related to the heart of the Gatwick Diamond, with its strategic economic advantages. The Strategic Employment Site 'Hobbs Industrial Estate' and the Important Employment Area 'Cophall Farm' are both located in reasonable proximity to Domewood and are identified as being suitable for expansion/intensification. The smaller Snowhill Business Centre is within Domewood itself.

There are relatively few historic assets in the Domewood area and it is relatively free of flood risk. The area is predominantly agricultural land quality 3.

Table 31: Domewood Sites - Key Details, Commentary and Conclusions

DOMWOOD				
Site	Address	Current Use	Proposed Use	SA COMMENTARY, MITIGATIONS & CONCLUSION
DOM 012	Land at Copthorne Bank	Woodland, stable and grazing pasture.	Residential	The sites on the northern urban edge of Copthorne are within the Low Weald Farmland LCA. There is the potential for these sites to conflict with the LCA guidance that requires development to 'conserve and enhance the landscape setting to villages and edge of settlement'. Agricultural land quality grade 3. Rural character. Partially woodland site (BAP priority habitat). Not adjacent to settlement, but adjacent to DOM 13 which is. Potentially affects listed building setting. Contamination risk (waste transfer site) Rejected - Landscape and Tier 4 (Not in accordance with the Preferred Strategy)
DOM 013	Land west of Roundabouts Farm, Clay Hall Lane, Crawley	Vacant fields	Residential	Agricultural land quality grade 3. Bounded by mature trees. Area at risk of surface water flooding in the eastern part of the site. Rural character. The sites on the northern urban edge of Copthorne are within the Low Weald Farmland LCA. There is the potential for these sites to conflict with the LCA guidance that requires development to 'conserve and enhance the landscape setting to villages and edge of settlement'. Rejected - Ecology and Tier 4 (Not in accordance with the Preferred Strategy)
DOM 014	Land north of Stonelands Farm, Copthorne	Farmland	Residential	Agricultural land quality grade 3. Tress and high hedges. Ancient woodland on south weseten edge of site, with root protection area buffer across potential access route. Potentially affects listed building setting. Rural character. The sites on the northern urban edge of Copthorne are within the Low Weald Farmland LCA. There is the potential for these sites to conflict with the LCA guidance that requires development to 'conserve and enhance the landscape setting to villages and edge of settlement'. Rejected - Landscape
DOM 016	Land north of Roundabouts Farm, Clay Hall Lane, Crawley	Scrub bounded by mature trees	Residential	Not adjacent to settlement, but adjacent to DOM 13 which is. Rural character. Agricultural land quality grade 3. Partially woodland site (BAP priority habitat). The sites on the northern urban edge of Copthorne are within the Low Weald Farmland LCA. There is the potential for these sites to conflict with the LCA guidance that requires development to 'conserve and enhance the landscape setting to villages and edge of settlement'. Areas of surface water flood riak at boundaries and northern sections. Rejected - Landscape & Ecology
DOM 017	Land south of Roundabouts Farm, Clay Hall Lane, Crawley	Grazing alnd and open scrub.	Residential	The sites on the northern urban edge of Copthorne are within the Low Weald Farmland LCA. There is the potential for these sites to conflict with the LCA guidance that requires development to 'conserve and enhance the landscape setting to villages and edge of settlement'. Rural character area bounded by mature trees. Agricultural land quality grade 3. Rejected - Ecology
DOM 019	Land at Shipley Bridge Lane, Copthorne	The site contains Holly Bush Business Centre and some adjacent fields to the east.	Residential	Partial business use. Greenfield rural character. Agricultural land quality grade 3. The sites on the northern urban edge of Copthorne are within the Low Weald Farmland LCA. There is the potential for these sites to conflict with the LCA guidance that requires development to 'conserve and enhance the landscape setting to villages and edge of settlement'. The settlement hierarchy 2015 recognises that settlements outside our District cannot feature on our settlement hierarchy when they are referenced in another Districts settlement hierarchy and therefore it would be inappropriatte to consider small scale sites on the edge of neighbourhood authorities boundaries. Rejected
DOM 022	Land south of Ferry House, Copthorne Bank	Fields	Residential	Rural character. Agricultural land quality grade 3. The sites on the northern urban edge of Copthorne are within the Low Weald Farmland LCA. There is the potential for these sites to conflict with the LCA guidance that requires development to 'conserve and enhance the landscape setting to villages and edge of settlement'. The settlement hierarchy 2015 recognises that settlements outside our District cannot feature on our settlement hierarchy when they are referenced in another Districts settlement hierarchy and therefore it would be inappropriatte to consider small scale sites on the edge of neighbourhood authorities boundaries. Rejected.

Table 32: Domewood Sites – Assessment Matrix

Site	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport and Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
DOM 012	++	-	-	+	-	0	-	0	-	0	+	0	-	-	-	-
DOM 013	++	-	0	+	-	0	-	0	-	0	+	0	-	-	0/-	--
DOM 014	++	-	-	+	-	0	-	0	-	0	+	0	-	-	-/--	0/-
DOM 016	++	-	0	+	-	0	-	0	-	0	+	0	-	-	-/--	--
DOM 017	++	-	0	+	-	0	-	0	-	0	+	0	-	-	0/-	--
DOM 019	+	-	-	+	-	0	-	0	-	0	0/+	0	0/-	-	0	0/-
DOM 022	+	-	-	+	-	0	-	0	-	0	+	0	-	-	0/+	0

It can be concluded that Domewood cannot be considered a suitable location, on balance of considerations.

5.11.9 Dormansland

Dormansland was founded in the 19th century and has a population of just under 2,000.

Dormansland was identified as a 'Rural Settlement' (Tier 3) in the Council's Settlement Hierarchy (2015). The village has a village shop/post office and a primary school. However there is no secondary school and no GP surgery located in the Dormansland village. There are no secondary schools within 2km of Dormansland. The closest would be in East Grinstead, 3.5km to the south. The nearest GP surgery to Dormansland is located at Lingfield (The Lingfield Practice).

Dormansland has a train station (Dormans) connecting to London. A public footpath connects the train station to the town centre. There are also bus services connecting to Tunbridge Wells, Oxted and East Grinstead. Ladycross Business Park located just south-east of the village.

The village is bounded by the High Weald AONB to the east. Most of the village is within the 'Wooded High Weald' landscape character area, and there are blocks of ancient woodland in the surrounding area. It is predominantly grade 3 agricultural land.

Greathed Manor is a Grade II registered park and garden to the east of Dormansland. Approximately half of the site comprises St Johns Wood, with open grassland to the north east. There are a number of Grade II listed buildings in Dormansland, with a notable cluster of six on the east-west branches of the High Street.

The Infrastructure Delivery Plan identifies a Multi-Use Games-Area (MUGA) and children's play area for Dormansland Primary School as High priority, as well as footway improvements in the area.

Within this 2018 SA, the 'SA of Options: Individual Settlements – their Status in the Strategic Settlement Hierarchy and its Implications for their Suitability for Growth' supports the conclusion that Dormansland is not a particularly sustainable location for growth.

It can be concluded that Dormansland cannot be considered a suitable location on balance of considerations.

Table 33: Dormansland Sites - Key Details, Commentary and Conclusions

DORMANSLAND				
Site	Address	Current Use	Proposed Use	SA COMMENTARY, MITIGATIONS & CONCLUSION
DOR 007	"Land west of Dormans Road and North of West Street, Dormansland"	Vacant field.	Residential	Grade 3 agricultural land. Greenfield site bounded by trees. Surface water flood risk at access point. Rural character. Rejected - Tier 3
DOR 008	Land at Farindons, Dormansland	Property and gardens	Residential	Grade 3 agricultural land. Partially wooded and contains a large pond (BAP priority habitats). Potential to effect setting of listed building. Close proximity to AONB. Rejected - Tier 3 & Ecology
DOR 011	Land at Parklands Farm, Dormans Road, Dormansland	Residential dwelling, garden, outbuildings and hardstanding, paddock and field.	Residential	Tertiary rivers and streams on site. Surface water flood risk in places. Trees and hedgerows across site. Rural character. Agricultural land quality grade 3 and 4. Rejected - Tier 3 & Landscape

Table 34: Dormansland Sites - Assessment Matrix

Site	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport and Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
DOR 007	+	-	-	+	-	0	+	0	-	0	+	0	-	+	0	0
DOR 008	++	-	-	+	-	0	+	0	-	0	+	0	-	+	0/-	-
DOR 011	++	-	-	+	-	0	+	0	-	0	0	0	0/-	0	-	0

5.11.10 Felbridge

Felbridge has a population of about 1,100 and was identified as a 'Rural Settlement' (Tier 3) in the Council's Settlement Hierarchy (2015).

Access to facilities and amenities in Felbridge is limited to local convenience stores and other community facilities. The village has access to bus services, education provision and a range of shops and community facilities to serve the local community. Whilst there is no healthcare provision in Felbridge itself, East Grinstead is less than 3 miles away where a wider choice of services and facilities are accessible. The nearest train station is also in east Grinstead. There is a primary school in Felbridge, the closest secondary school is in East Grinstead, which is in neighbouring Mid Sussex. In addition to East Grinstead it is likely that residents will frequent Crawley (9 miles) and Copthorne (5 miles) both of which lie to the west.

Felbridge is located in proximity to both the A22 and A264. Felbridge Junction (A22/A264) will benefit from improvements that are identified as a high priority in the Infrastructure Delivery Plan. Also identified in the IDP are pedestrian and cycle network improvements.

The Strategic Employment Site 'Hobbs Industrial Estate' is located in reasonable proximity to Felbridge and is identified as being suitable for expansion/intensification.

Felbridge is within the Woodland High Weald Landscape Character Area and there is significant woodland coverage in the vicinity, much of it ancient. The village an area of grade 3 agricultural land quality. Some parts of Felbridge and Dorman's Park are within the Ashdown Forest 7km mitigation zone, necessitating SAMM and SANG contributions.

Within this 2018 SA, Section 5.10 the 'SA of Options: Individual Settlements – their Status in the Strategic Settlement Hierarchy and its Implications for their Suitability for Growth' supports the conclusion that Felbridge is not a particularly sustainable location for growth.

Table 35: Felbridge Sites - Key Details, Commentary and Conclusions

FELBRIDGE				
Site	Address	Current Use	Proposed Use	SA COMMENTARY, MITIGATIONS & CONCLUSION
FEL 001	Land North of Felbridge Hotel	Open land. Two tennis courts that are associated with the Crown Plaza hotel occupy part of the site	Residential	Series of semi-improved grassland meadows bordered by woodland bands and hedgerows. The site also includes an area of woodland and sports pitch. Within Ashdown Forest 7km mitigation zone, SAMM/SANG necessary. Woodland TPO north-east of site. Area at risk of surface water flooding to the south of the site. Rural character. Agricultural land quality grade 3. Rejected - Landscape & Ecology
FEL 004	Land opposite Doves Barn Nursey	Woodland, grassland and scrub.	Residential	Hedgecourt SSSI is situated 100m to the north of the site. It consists of a woodland and a large lake. Continuous canopy cover connects the SSSI to FEL 004. Agricultural land quality grade 3. Rejected - Ecology
FEL 005	Eastbourne Road Felbridge	Greenfield	Residential	Semi-improved grassland with dense scrub and woodland including TPOs within site boundary. Agricultural land quality grade 3. Rejected - Ecology
FEL 008	Land east of Eastbourne Road, Felbridge	Partially wooded greenfield site	Residential	Within Ashdown Forest 7km zone, mitigation (SAMM/SANG) necessary. Woodland (BAP priority habitat) on site. Rural character. Agricultural land quality grade 3. Tier 3 (not in accordance with strategy). Rejected.
FEL 014	Land north of Crawley Down Road	Grassland	Residential	Mature trees and hedges on site. Agricultural land quality grade 3. Habitats linkages with wider area. SSSI 500m to north. Rejected - Ecology
DPA 008	Land at Lingfield Road	Property and garden, wooded	Residential	Within Ashdown Forest 7km mitigation zone, SAMM/SANG necessary. Agricultural land quality grade 3. Well wooded site, including ancient woodland on west of site and TPO to nw. Ponds on site. Rejected - Ecology

Table 36: Felbridge Sites - Assessment Matrix

Site	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport and Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
FEL 001	++	-	-	+	-	0	+	0	0	0	0/+	0/-	-	0	-	-
FEL 004	++	-	-	+	-	0	+	0	0	0	+	-	-	0	0	--
FEL 005	+	-	-	+	-	0	+	0	0	0	+	0	-	0	0	-
FEL 008	+	-	0	+	-	0	+	0	0	0	+	0	-	0	+	0
FEL 014	+	-	-	+	-	0	+	0	0	0	+	0	-	0	0	--
DPA 008	+	0/-	-	+	-	0	+	0	0	0	+	0/-	-	0	0	-

It can be concluded that Felbridge is not a suitable location, on balance of considerations.

5.11.11 Godstone

Godstone was identified as a 'Semi-Rural Service Settlement' (Tier 2) in the Council's Settlement Hierarchy (2015). Within this 2018 SA, Section 5.10 'SA of Options: Individual Settlements – their Status in the Strategic Settlement Hierarchy and its Implications for their Suitability for Growth' supports the conclusion regarding that Godstone is a settlement that can be considered a sustainable location for growth. This section considers the sustainability of individual site options.

Godstone contains local facilities and amenities including a post office and local convenience store. Larger scale shopping opportunities, such as supermarkets, would require travel, for example, to Caterham. In light of the limited accessibility of public transport in Godstone and the convenient road connections, it is anticipated that a high proportion of these trips would be made by car. Godstone Village Primary School is in the centre of the village. The closest secondary schools are in Caterham and Oxted, 5km away.

Pond Tail Surgery is located in the centre of the Godstone urban area, which is a positive in respect of SA objective 2 (health and wellbeing). However, an important consideration in relation to objective 2 is that now South Godstone is now the preferred location for the new Garden Community, it seems likely that the current Godstone GP surgery will relocate to the nearby larger settlement. Therefore, the sustainability of Godstone will reduce significantly in respect of Objective 2 (Health and Wellbeing) in the longer term. 'Longer term' in this context means post 2026 once the South Godstone community begins construction. Given the construction of the Garden Community will take many years and continue beyond the end of the plan period of 2033, this change may not even occur within the plan period.

Godstone has arguably the best highway connections in the District, being adjacent to junction 6 of the M25 and situated where the A22 and A25 meet.

The closest train station to Godstone is Caterham, 3.5km to the north on the opposing side of the M25. Godstone train station is 3.7km to the south, in South Godstone. Bus services do serve the village – connections include Oxted, Redhill and Caterham. Accessibility by sustainable transport will also be improved by improvements to the Godstone to Whyteleafe cycle route which are medium priority in the Infrastructure Delivery Plan. The Infrastructure Delivery Plan also identifies footway improvements for Godstone, as well as allotment and youth provision, and upgrades to the park and recreation ground.

Within the Retail Hierarchy, Godstone is defined as a 'Local Centre', which provides some local employment. Benefiting from its location adjacent to the M25 Junction 6 and on the A25. Local Employment areas include Rooks Nest Farm, Ivy Mill Lane Workshops as well as local builders and timber merchants. In addition, Brewer Street, which is identified as an Important Employment Area suitable for expansion/intensification is located a short distance west of Godstone. In an economic sense, Godstone benefits from its excellent connections to the road network, although this inevitably increases and encourages reliance on the private car with air quality implications.

Godstone (The Green) Conservation Area is located centrally. The conservation area also includes a number of Grade II listed buildings along the A25 in the centre of the village, close to the post office. There are two scheduled ancient monuments/areas of high archaeological potential just south-west of the village. The Surrey Hills AONB is adjacent to the village to the north-west. Areas south and west of the village are classed as 'Areas of Great Landscape Value'.

Godstone is entirely in a Groundwater Source Protection Zone, so impacts of development upon water quality are a particular consideration.

Godstone has a historic legacy of quarrying and there are a number of former landfill sites in the area, notably to the west of the settlement. The settlement does not have areas of flood zone 2 or 3, although there are areas of surface water flood risk. The area is a mix of agricultural land quality grades 3 and 4. There are a handful of ancient woodlands around the town and large areas adjacent both to the west and south-east are classed as Biodiversity Opportunity Areas (BOAs).

Godstone's position adjacent to junction 6 of the M25 means development here may encourage car dependency.

Table 37: Godstone Sites - Key Details, Commentary and Conclusions

GODSTONE				
Site	Address	Current Use	Proposed Use	SA COMMENTARY, MITIGATIONS & CONCLUSION
GOD 001	Godstone Reservoirs	Reservoir and open land	Residential	Contamination risks -small section is former historic quarry and landfill site, now covered by trees and vegetaion. Reservoir on site which has a recreational value, as well as Great Crested Newt (protected species) for which the wider site would provide a terrestrial hinterland foraging and breeding area. A numnber of protected bird species are assciated with the reservoir as well. Site is adjacent to ancient woodland which would require buffering and provides wider ecological connectivity to s41 deciduous woodland on site. Complete development would result in loss of valued local habitats. Groundwater Source Protection Zone. Rejected - Landscape & Ecology
GOD 004	Land at Godstone Allotments	Allotments	Residential	Currently Allotments which have considerable sustainablity value in terms of passive recreation, local produce and environment. Also situated in the conservation area and a Groundwater Source Protection Zone. The site is opposite an SNCI. More or less adjacent a scheduled ancient monument (Bowl barrow at north end of Hilly Field) and area of archaeological potential so the site has heritage constraints. Agricultural land quality grade 3. Rejected - Ecology + failed Green Belt exceptional circumstances test.
GOD 008	Land behind the Hare & Hounds Pub, Godstone	Woodland and scrub	Residential	Small wooded site adjacent to SNCI. Within Conservation Area and Groundwater Source Protection Zone. Two nearby scheduled ancient monuments and areas of high archaeological potential. Agricultural land quality grade 3. Rejected - Ecology + failed Green Belt exceptional circumstances test.
GOD 010	Land to the west of Godstone	Open land, including woodland.	Residential	Partial overlap with AONB and ancient woodland across access points. Within a Groundwater Source Protection Zone. Predominantly Agricultural land quality grade 3. Sustainable on balance of considerations. Allocated
GOD 017	Land to the rear of Hare & Hounds Pub	Open land and storage.	Residential	Within a Conservation Area and a Groundwater Source Protection Zone. Opposite a SNCI. Directly adjacent a scheduled ancient monument and area of archaeological potential so the site has serious heritage constraints. Agricultural land quality grade 3. Some trees on site. Rejected - Ecology + failed Green Belt exceptional circumstances test.
GOD 019	Land to the rear of 44-46 High Street, Godstone and south of Dumville Drive	vacant	Residential	With a Groundwater Source Protection Zone. Partially within a Conservation Area, and directly adjacent a scheduled ancient monument (Bowl barrow at north end of Hilly Field) and area of archaeological potential so the site has serious heritage constraints. Agricultural land quality grade 3. Failed Green Belt exceptional circumstances test (grouped with GOD004, GOD008, GOD017, GOD019). Rejected
GOD 021	William Way Builders Merchants, 38-42 High Street, Godstone	builders yard	Residential	Brownfileld site in employment use, although predominantly used as open storage - possible dust, pollution issues for adjacent residential area. Within a Groundwater Source Protection Zone. Former landfill site with potential contamination. Well located for local services in comparison to other Godstone options. Sustainable on balance of considerations. .Allocated
GOD 022	Land at Ivy Mill Lane	Open land, grazing land.	Residential	Agricultural land quality grade 3. Groundwater Source Protection Zone. Flood Zone 2 to the north east of the site. Possible contamination - entirely within a historic landfill site. Within minerals safeguarding area. Rejected - Landscape & Ecology
GOD 024	Land to the east of High Street	Agricultural	Residential	In a Groundwater Source Protection Zone and BOA. Agricultural land quality grade 3. Flood zone 2/3 to the east of the site. Godstone Ponds SSSI sits immediately to the east of the site Rejected - Ecology + failed Green Belt exceptional circumstances test.

Table 38: Godstone Sites - Assessment Matrix

Site	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport and Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
GOD 001	++	++	-	-	-	0	+	0	-	0	+	-	-/--	-	-/--	-
GOD 004	+	--	-	-	-	0	+	0	--	0	+	-	-	-	0	-
GOD 008	+	-	-	-	-	0	+	0	-	0	+	-	-	-	0/+	-
GOD 010	++	++	-	-	-	0	+	0	-	0	+	-	-	-	0/-	0
GOD 017	+	++	-	-	-	0	+	0	-	0	+	-	-	-	0/+	-
GOD 019	+	++	-	-	-	0	+	0	-	0	+	-	-	-	0/-	0
GOD 021	+	++	-	0	+	0	-	0	-	0	+	-	-	-	+	0
GOD 022	++	+//++	-	-	-	0	+	0	--	0	+	-	-	-	-/--	-
GOD 024	++	++	-	-	-	0	+	0	-	0	0/+	-	-	-	0/-	-

5.11.12 Lingfield

Lingfield has a population of approximately 3,900. It was identified as a 'Semi-Rural Service Settlement' (Tier 2) in the Council's Settlement Hierarchy (2015).

Lingfield, located in the south of the district has a good range of retail and community facilities, health care provision and a primary school. It is likely that services in Lingfield are not only supported by the local population but utilised and accessed by the more rural settlements in the vicinity such as Dormansland and Blindley Heath.

Within the Retail Hierarchy, Lingfield is defined as a 'Local Centre' which provides some local employment opportunities. However there is a notable absence of business park/industrial estates at Lingfield. Lingfield Train Station provides sustainable transport to employment opportunities in, among other locations, London and East Grinstead. These are a journey of 50 minutes and 10 minutes respectively. In addition, Lingfield makes an economic contribution to the local area and wider via the presence of the year-round Lingfield Racecourse and the Marriott Hotel which attract numerous visitors and also provide local employment opportunities.

All sites considered within Lingfield have good access to Lingfield Train Station and close access to bus stops. There are also a range of facilities and amenities within Lingfield including supermarkets, community facilities and a primary school. The Lingfield Practice GP surgery is located in the centre of the village. Lingfield acts as a service centre for nearby smaller settlements

The Lingfield conservation area is in the centre of the village. Lingfield contains two main clusters of listed buildings. The first is around the Church of St Peter and St Paul, which is a Grade I listed building. Adjacent to this is Pollard House, also a Grade I listed building. There are a further four Grade II* and six Grade II listed buildings in the immediate area. The St Peter's Cross and Village Cage Grade I listed building and scheduled monument dating from circa 1437 is located to the south west of Lingfield. The second cluster is a number of other Grade II and a Grade II* listed buildings along Plaistow Street including Drivers Cottages and Cordreys Barn. The setting of these listed buildings may be adversely affected by LIN 012. LIN 005 may adversely affect the setting of The Old House, a Grade II listed building to the immediate south of the site.

The Eden Brook flows to the east of the village but Lingfield is mostly free of fluvial flood risk, bar the far north of the village and a tiny section at the south-east. There are sporadic areas of surface water flood risk, particularly in the north east of the village. there is no nearby groundwater source zones so development here would pose negligible inherent risks or benefits to water quality.

The area is within the Low Weald Farmland LCA. the LCA guidance that requires development to 'conserve and enhance the landscape setting to villages and edge of settlement'³ . The land is predominantly agricultural land quality grade 3.

There is a Local Nature Reserve 'Lingfield Wildlife Area' which is located north-west of the settlement. The River Eden and its tributaries are classified as a Biodiversity Opportunity Area, which sits adjacent to the east and north of Lingfield.

The Infrastructure Delivery Plan identifies a number of improvements for Lingfield , notably a re-build of the GP surgery, a mobility impaired persons bridge at the train station and car parking provision at Station Road/Town Hill.

Within this 2018 SA, the 'SA of Options: Individual Settlements – their Status in the Strategic Settlement Hierarchy and its Implications for their Suitability for Growth' supports the conclusion regarding that Lingfield is a settlement that can be considered a sustainable location for growth. This section considers the sustainability of individual site options.

Table 39: Lingfield Sites - Key Details, Commentary and Conclusions

LINGFIELD				
LIN 005	Land at Godstone Road, Lingfield	Open field	Residential	Visually exposed to long views from north. Agricultural land quality grade 3. May affect setting of listed property . Hedges and woodland at boundaries. Rejected - Landscape + failed Green Belt exceptional circumstances test.
LIN 012	Land at Lingfield Park, Lingfield, Surrey	Fields and orchards	Residential	wooded site on elevated landscape south of the village. Agricultural land quality grade 3. Rejected - Landscape & Ecology.
LIN 020	Land to the south west of Lingfield	Open field	Residential	Visually exposed from south. Agricultural land quality grade 3. Grade II listed building opposite Rejected - Landscape + failed Green Belt exceptional circumstances test.
LIN 027	Land behind Saxbys Lane	Open field	Residential	Adjacent LNR and SNCI. Bounded by mature hedgerows and trees. Agricultural land quality grade 3. Adjacent to metal coatings/solvents (2002 GIS) contamination risk. Rejected - Ecology.
LIN 030	Land at the Old Cottage, Station Road, Lingfield	Agricultural field.	Residential	West and north sections within a Conservation Area, with several listed buildings (including Grade 1 Pollard House/Cottage) located off-site to the west beyond the intervening Star PH. Grade II* listed structures also sit to the east. Sympathetic consideration of historical setting, will be necessary in any layout as well as choice of materials. Rivers and streams in vicinity (NW boundary and offsite to east and south). Small area of BOA and FZ2 at SE corner, but not sufficient to fail exception test. Small area of contamination risk at west of site (Brickworks 1895). Agricultural land quality grade 3. Well related to existing village form, centre of settlement and train station compared to ther sites. Public footpath across site. Development may provide opportunities to further improve pedestrian connectivity. Sustainable on balance of considerations. Allocated.
LIN 031	Lingfield House, East Grinstead Road, Lingfield, RH7 6ES	House and fields.	Residential	Bounded by hedgerows. Surrounded by agricultural land (mostly grade 3a) - rural character. Rejected - Landscape.
LIN 033	Woodland, Vicarage Road	House and garden.	Residential	Agricultural land quality grade 3. Adjacent SSSI and LNR. Mature trees at boundaries. Failed Green Belt exceptional circumstances test.
LIN 034	Land rear of Knights Mead	Grazing land.	Residential	Flood zone 3 and Surface water flood issues at access - Exceptions test fail. Ag land 3&4. Adjacent to metal coatings/solvents (2002 GIS) contamination risk. Public footpath at northern border. Accessed via BOA and hedgerow bisects site. Rejected - Ecology.

Table 40: Lingfield Sites - Assessment Matrix

Site	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport and Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
LIN 005	++	++	-	+	-	0	+	0	-	0	+	0	-	+	-	0/-
LIN 012	++	++	-	+	-	0	+	0	-	0	+	0	-	+	-/--	-
LIN 020	++	++	-	+	-	0	+	0	-	0	+	0	-	+	-	0
LIN 027	++	++	-	+	-	0	+	0	-	0	+	0	-/--	+	0/-	--
LIN 030	++	++	-	+	-	0	+	0	-	0	0/+	0/-	-/--	+	0/-	0/-
LIN 031	++	++	0	+	-	0	+	0	-	0	+	0	-	+	-	0
LIN 033	+	++	0	+	0	0	+	0	-	0	+	0	0	+	0/+	0/-
LIN 034	++	+	-	+	-	0	+	0	-	0	-/--	0	-/--	+	0/-	--

5.11.13 Oxted (including Hurst Green and Limpsfield)

Oxted is the administrative centre of the district where the Council Offices are located, and was identified as an Urban Settlement' (Tier 1) in the Council's Settlement Hierarchy (2015). Oxted has co-joining settlements - Hurst Green and Limpsfield. Within this 2018 SA, Section 5.10 'SA of Options: Individual Settlements – their Status in the Strategic Settlement Hierarchy and its Implications for their Suitability for Growth' supports the conclusion regarding that Oxted is a settlement that can be considered a sustainable location for growth. This section considers the sustainability of individual site options.

Oxted has two train stations; Hurst Green and Oxted providing connections to London, and is well served by bus services. It is well served by public transport, minimising the need to travel by car and benefitting air quality. The town has direct access to the A25.

At its core, Oxted has a defined and varied town centre as well as health care provision, library, employment opportunities and well utilised recreation and community facilities. Within the Retail Hierarchy, Oxted is defined as one of two 'Town Centres', the highest level of the retail hierarchy in Tandridge (The other Town Centre is Caterham Valley. In addition, Hurst Green is defined as a Neighbourhood Centre. The town is also the head office of Tandridge District Council provides service and office based employment opportunities as a result. However, there are very limited areas of dedicated employment space, although Westerham Road Industrial Estate is located 2.5km to the east and is classed as a Strategic Employment Area, suitable for expansion/intensification. All sites have ready access to employment opportunities in Oxted. Frequent rail services to London Bridge and London Victoria take approximately 30-40mins and are convenient for commuters to the capital.

Oxted has one secondary school, which is Oxted School on Bluehouse Lane in the northern area of the town. There are three primary schools in Oxted covering the northern, central and southern areas. Oxted has a single GP surgery in the northern area of the town, approximately 335m east of Oxted Station, some sites are still located quite far from the GP, particularly those to the south of Hurst Green.

There are four Conservation Areas in the Oxted area: Station Road West Oxted; Broadham Green; Limpsfield; and Oxted. The scheduled monument 'The Mount, Barrow Green' is just outside the north western urban edge of Oxted. Home Farm Bridge Scheduled Monument is 90m west of Hurst Green. There are four Grade I listed buildings in the area: Church of St Peter; Old Court Cottage; Barrow Green Court; and Church of St Mary the Virgin. There are Grade II and II* listed buildings throughout Oxted, with particular clusters along the High Street in Old Oxted and along Limpsfield High Street.

The Surrey Hills AONB is adjacent to the north of Oxted, whilst an AONB candidate area is located to the west. An Area of Great Landscape Value (AGLV) is situated on the east side of Oxted. Groundwater Source Protection Zone 3 stretches across the northern area of Oxted and for those sites within this area there is an increased risk of contamination to groundwater. An belt of fluvial flood zone 3 stretches through Oxted following the course of the River Eden and its tributaries. There are bands of surface water flood risk across Hurst Green to the south.

There are three SSSIs in the Oxted area; the Woldingham & Oxted Downs SSSI to the north west, Titsey Woods SSSI to the North East, and Staffhurst Wood SSSI to the south east. Oxted and the surrounding countryside contains a large number of ancient woodlands. There are also a number of SNCIs in the area, predominantly in the Limpsfield Common, Chalkpit Wood and Honesland Wood areas.

The Infrastructure Delivery Plan identifies a number of improvements for the area including school expansions, multiuse sports hall, youth provision, allotment provision, surface water flood alleviation; junction improvements and footway improvements

Table 41: Oxted Sites - Key Details, Commentary and Conclusions

OXTED				
Site	Address	Current Use	Proposed Use	SA COMMENTARY, MITIGATIONS & CONCLUSION
OXT 006	Land adjacent to Oxted and Laverock School	vacant field.	Residential	Located immediately south of AONB and visible from it. Several Tree Preservation Orders within or adjacent to the site. Ancient woodland is located on the site's north western boundary edge. OXT 006 is adjacent to two Grade II listed Churches. Agricultural land quality grade 3. Failed Green Belt exceptional circumstances test.
OXT 007	Land adjacent to The Graveyard and St Mary's Church	Agriculture	Residential	Lined by trees and hedges. Public Right of Way running across site. TPOs on site. Ancient woodland on south-western boundary of site. Adjacent to the Grade I listed Church of St Mary the Virgin. Failed Green Belt exceptional circumstances test
OXT 016	Oxted Gas Holder, Station Road East, Oxted	former gas holder	Residential	Gas Tower - part of broader Oxted town centre allocation. Brownfield site with a high risk of contamination. Nearby conservation area to the north-west. Removal of rusting gas holder would benefit townscape, views, etc. Received Planning Permission.
OXT 020	Land at Pollards Wood Road, Hurst Green	agricultural	Residential	Woodland on western edge. Only accessible via OXT 052 which is public open space + failed Green Belt exceptional circumstances test.
OXT 021	Land west of Red Lane, Hurst Green, Oxted	Vacant fields, with two residential properties taking up a small portion of the site.	Residential	Tree belts, hedges on site and pond immediately adjacent. Odour Assessment required, as within 800m of WWTW. Allocated (grouped with OXT 048 AND OXT 063)
OXT 034	Land adjoining St Mary's Church, Oxted	woodland	Residential	Woodland, with one TPO on site and others at boundaries. Listed Buildings, including the Grade I St. Mary's Church are in the vicinity. Public right of way across the site. Areas of surface water flooding risk on site. Rejected - Landscape & Ecology
OXT 035	Land at Chalkpit Lane, Oxted, adjacent to the railway line	woodland	Residential	Woodland site, including ancient woodland and TPOs. Armitage Wood and Hamfield Shaw SNCI is within the site boundary. OXT 035 is bordered by the M25 to the north and the railway to Oxted to the west. Taken together the air quality, noise and vibration issues from these sources may be substantial. Agricultural land quality grade 3. Rejected - Landscape & Ecology
OXT 052	Boulthurst Way Open Space, Hurst Green	Open space and play area.	Residential	Recreation ground containing play area and woodland. Received Planning permission
OXT 067	Warren Lane Depot, Oxted	depot	Residential	Brownfield site. Mature trees at frontage. Possible contamination from on-site and neighbouring uses. Odour Assessment required, as within 800m of WWTW. Semi-employment use loss from low density site balanced against housing provision in a settlement with good access to employment. Sustainable on balance of considerations. Allocated
OXT 072	Rocks Hill, Westerham Road, Oxted	Residential and garden, fields and overgrown former allotments.	Residential	Adjacent conservation area, adjacent SNCI and adjacent to Limpsfield Common. Heritage issues. Rejected - Ecology + failed Green Belt exceptional circumstances test.
OXT 074	Hurst Green Extension	Agricultural, plus a gym and tennis courts.	Residential	Small TPO central on site. Recreational uses. Two public footpaths on site. A Waste Water Treatment Works lies to the north west of the site and odours would need to be considered through the development management process. There are areas of the site at risk of surface water flooding and there is a small area of ancient woodland at the east of the site. Agricultural land quality grade 3 and small area of contamination risk on site spreading from larger area off-site (sewage treatment). Rejected - Landscape & Ecology + failed Green Belt exceptional circumstances test.
OXT 075	Land at Red Lane Stables	Stables, paddock, sand school and open land.	Residential	Areas of surface water flooding risk to north. Group TPO on south of the site. Failed Green Belt exceptional circumstances test.

Table 42: Oxted Sites - Assessment Matrix

Site	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport and Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
OXT 006	++	+	-	++	-	0	+	0	0	0	+	-	-	+	0/-	0
OXT 007	++	+	-	++	-	0	+	0	0	0	+	-	-	+	0/-	0
OXT 016	+	+	+	++	+	0	+	0	0	0	+	0	--	+	+	0
OXT 020	++	-	0	++	-	0	+	0	0	0	+	0	-	+	0	0/-
OXT 021	++	-	-	+	-	0	+	0	0	0	+	0	-	+	0	0/-
OXT 034	+	+	+	++	-	0	+	0	0	0	+	-	-	+	-/--	--
OXT 035	++	-	-	++	-	0	+	0	0	0	+	0	-	-	-/--	--
OXT 052	+	-	-	++	-	0	+	0	0	0	+	0	-	+	0/+	0/-
OXT 067	++	-	0	+	+	0	0	0	0	0	+	+	-/--	-/--	0/+	0/-
OXT 072	++	+	-	+	0/-	0	+	0	0	0	0/+	-	0	+	0	-
OXT 074	++	?/-	-	0	-	0	+	0	0	0	0/-	0	-/--	?/-	-/--	-
OXT 075	+	+	-	+	-	0	+	0	0	0	-	0	-	+	0/-	0/-

5.11.14 Smallfield

Smallfield has a population of about 3,800 and was identified as a 'Semi-Rural Service Settlement' (Tier 2) in the Council's Settlement Hierarchy (2015).

Within this 2018 SA, Section 5.10 'SA of Options: Individual Settlements – their Status in the Strategic Settlement Hierarchy and its Implications for their Suitability for Growth' supports the conclusion regarding that Smallfield is a settlement that can be considered a sustainable location for growth. This section considers the sustainability of individual site options.

Smallfield has no rail station. The closest train stations are Gatwick Airport and Horley, which are 3.5km and 3km from Smallfield respectively. Bus services connect to Horley, Redhill, Crawley, Reigate and Oxted. Smallfield's access to the strategic road network is poor, despite abutting the M25. However, there is a good level of shops, primary education, community facilities and access to local health care. Smallfield local shops are located on Redehall Road including a post office, convenience store and pharmacy. Larger scale shopping opportunities, such as supermarkets, are available in Horley 3km to the west. Smallfield Surgery is located in the centre of Smallfield. Burstow Primary School is in the centre of Smallfield and provides access to a primary school for sites on the urban edge of Smallfield. There is no state secondary school - Horley, Salfords, Crawley, or Redhill provide the main access to state secondary institutions. Burstow primary school is identified for expansion in the IDP as a medium priority.

Within the Retail Hierarchy, Smallfield is defined as a 'Local Centre'. Smallfield is in close proximity to Gatwick Airport and central within the Gatwick Diamond economic area. There are a number of employment areas both within the village and in the surrounding area, including Balfour Beatty and the Old Norton Site which both sit on the edge of the village.

The Grade II* listed Burstow Lodge is 370m from the northern urban extent of Smallfield. SMA 014 is adjacent to the Lodge and may adversely affect its setting. All sites on the urban edge of Smallfield have the potential to adversely affect the various Grade II listed buildings in the village.

Significant areas of the village are classed as flood zones 2 or 3. Extensive flooding has occurred within the village of Smallfield on multiple occasions causing damage to properties. Flood risk is from a combination of surface water runoff contributing to flooding in Weatherhill Stream, sewer flooding and groundwater flooding.

There are two ancient woodlands abutting the village, one to the north-east and one to the south-west. The River Mole Biodiversity Opportunity Area is located adjacent to the village, albeit on the other side of the M25 to the west.

Table 43: Smallfield Sites - Key Details, Commentary and Conclusions

SMALLFIELD				
Site	Address	Current Use	Proposed Use	SA COMMENTARY, MITIGATIONS & CONCLUSION
SMA 004	Land off Redehall Road	agricultural	Residential	Grade 4 agricultural land quality. Adjacent listed building. Allocated (SMA 004, 008 and 040 combined within Policy HSG01)
SMA 008	Land at Plough Road, Smallfield	vacant field	Residential	Grade 4 agricultural land quality. The northern part of the site is subject to a risk of surface water flooding. Area of contamination risk off-site to north. Adjacent listed building. Allocated (SMA 004, 008 and 040 combined within Policy HSG01)
SMA 009	Lower Broadbridge Farm, Smallfield	agricultural	Residential	Flood zone 2 and surface water flood risk to south of site. Area of contamination risk directly adjacent to the north. Agricultural land quality grade 3. Failed Green Belt exceptional circumstances test. Rejected.
SMA 013	Land at Chapel Road, Smallfield	agricultural	Residential	Mature trees at boundaries. Agricultural land quality grade 3. Rejected - Landscape
SMA 014	Land off Rookery Hill, Smallfield	Agricultural and small race track.	Residential	Setting of listed building issues - heritage. TPOs. Stream across site. Surface water flood risk. Ancient woodland on-site (north side) . Directly abuts the M23. Agricultural land quality grade 3. Adjacent contamination risk (works) Rejected - Landscape
SMA 015	Chapel Road	commercial	Residential	Brownfield site, relatively centrally located. Some loss of employment space, although in a confined residential character area. Flood zone 3. Flood zone combined with employment uses risks water quality. Flood mitigation on-site could potentially reduce risks in surrounding area. Sustainable on balance of considerations. Allocated.
SMA 020	Land at Green Farm Cottage	Agricultural and storage busijness.	Residential	Partailly employment land. The access from Plough Road would be entirely within Flood Zone 2. Adjacent listed building. Small area of contamination risk (car breakers) Rejected - Landscape + failed Green Belt exceptional circumstances test.
SMA 021	Land at Greenleas House, Smallfield	Agricultural, car workshop/scrapyard.	Residential	Flood zone 2 at north of site. Drainage issues. Surface water flow paths across site. Pond on east side. Adjacent ancient woodland to west - scope for improved habitat connectivity. Adjacent land to south east has possible contamination risk. Agricultural land quality grade 4. Public footpath through centre of site. Failed Green Belt exceptional circumstances test.
SMA 027	Land at May Cottage	Agricultural and some buildings.	Residential	Pond on site. Mature trees at boundaries. Areas of contamination risk in the vicinity (off-site). Failed Green Belt exceptional circumstances test
SMA 030	Land North of Plough Road, Smallfield	agricultural	Residential	Bounde by trees and hedgerows, but reasonably contained urban extension opportunity. Agricultural land quality grades 3 and 4. Flood zone 2 on site of site. Adjacent to employment areas (contamination risk from former cement/brick works) and play area, bus route on frontage and reasonable proximity to services. Sustainable on balance of considerations. Allocated
SMA 031	Bridgeham Farm	dwelling, stables, sand-school yard and grazing land.	Residential	Bounded by ancient woodland to east. Surface water flood risk at frontage. Agricultural land quality grade 3. Ecologically sensitive. Failed Green Belt exceptional circumstances test
SMA 039	Woodlands Garage, Smallfield	Garage	Residential	Garage site, flood zone 3. Contamination risk highlighted (underground storage tanks), with risk exacerbated by presence in Flood zone 3. Residential character location and well related to services. Sustainable on balance of considerations. Allocated
SMA 040	51 Redehall Road, Smallfield	Dwellling, garden and agricultural field.	Residential	Grade 4 agricultural land quality. Surface water flooding at access to west. Close to Gatwick flight path. Sustainable on balance of considerations. Allocated (SMA 004, 008 and 040 combined within Policy HSG01)

Table 44: Smallfield Sites - Assessment Matrix

Site	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport and Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
SMA 004	++	+	-	+	-	0	+	0	-	0	+	0	-	-	0	0
SMA 008	+	+	-	+	-	0	+	0	-	0	+	0	-/--	-	0/+	0
SMA 009	++	+	-	+	-	0	+	0	-	0	-	0	-	-	0	0
SMA 013	++	+	-	+	-	0	+	0	-	0	+	0	-	-	-/--	0
SMA 014	++	+	-	+	-	0	+	0	-	0	+	-	-/--	-	-/--	0/-
SMA 015	+	+	0	+	+	0	-	0	-	0	--	0	0	0	0/+	0
SMA 020	++	+	-	+	-	0	+	0	-	0	+	0	-/--	-	-	0
SMA 021	++	+	-	+	-	0	+	0	-	0	-	0	-	-	0	0/-
SMA 027	++	+	-	+	-	0	+	0	-	0	+	0	-	-	0/+	0
SMA 030	++	+	-	+	-	0	+	0	-	0	0/+	0	-/--	-	0/-	0
SMA 031	++	+	-	+	-	0	+	0	-	0	+	0	-	-	0	-
SMA 039	+	+	0	+	+	0	0/-	0	-	0	--	-/--	--	-	0/+	0
SMA 040	+	+	-	+	-	0	+	0	-	0	-	0	-	-	0/+	0/-

Relationship to Garden Community

South Godstone is the preferred location for a new Garden Community in the Local Plan. It is important to note that the suitability of South Godstone for a new large scale *Garden Community* is considered in other sections of this SA, namely 5.13, 5.14 and 5.21.

It is also important to note that assessment factors for a garden settlement scale are not directly comparable to the assessment factors for an individual site. For example, there is inevitably a larger landscape impact resulting from a new settlement of several thousand homes compared to a small site of 10 or 20 houses. However, the former may be judged and assessed in the context of a corporate commitment to a new garden settlement that is necessary to meet the District's pressing housing needs and requirements that must be met *somewhere*, but can only be met in a very limited number of alternative locations. Furthermore, the sustainability of a garden settlement may be higher because it can generate a critical mass sufficient to deliver essential local services and wider infrastructure improvements.

In comparison, and in the absence of a planned garden settlement, a small site in the same vicinity may be judged against the impacts of piecemeal growth that may reasonably be located in many other alternative locations District wide. Furthermore, an isolated small scale development will not generate additional service provision so may be inherently less sustainable than if the same patch of land were to be absorbed into a garden settlement.

This section considers the sustainability of *individual sites* in South Godstone. However, this is undertaken in two distinct ways:

1. Consideration of sites regardless of wider considerations of Garden Settlement matters. The current village of South Godstone is a tier 3 settlement. Other tier 3 settlements (e.g. Bletchingley, South Nutfield, Tatsfield) have had individual site options considered (both in the SA and the HELAA), provided sites are adjacent to the existing settlement. Therefore, this process is also continued for South Godstone, in the section below this text box.

The following sites that were submitted independently are also contained within the 464ha South Godstone Area of Search: SGOD 005 (Main south section), SGOD 009, SGOD 010, SGOD 011, SGOD 012, SGOD 014, SGOD 019, SGOD 020, SGOD 021.

See Table 45a for details.

2. Consideration of sites that are not currently adjacent to the tier 3 settlement (so not necessary to consider under part 1) but will still be considered as they are adjacent to the much larger Garden Settlement Area of Search. Therefore, they could conceivably have formed part of an even larger settlement/area of search, although much of the objectives are scored unknown as factors depend on the form and composition of the future settlement.

The following sites are outside the South Godstone Area of Search and are therefore necessary to consider separately to it: SGOD 005 (north section only, south section is within the Area of Search), SGOD 006, SGOD 013, SGOD 022.

See Table 45b for details.

The existing village of South Godstone has a population of about 1,500 and was identified as a 'Rural Settlement' (Tier 3) in the Council's Settlement Hierarchy (2015). South Godstone originated as a medieval community known as Langham and over time has developed to its current form as an established residential area.

Access to public transport in South Godstone is good, with Godstone train station located in the centre of the village. South Godstone is situated on the Redhill to Tonbridge line and attracts non-resident commuters who make use of railway station. Residents have immediate access to the Strategic Road Network (A22). Bus services pass through the centre of the village along the A22.

Access to shops and services in the local is limited, however Redhill can be accessed easily from Godstone train station. There is a primary school and recreational facilities, but the nearest secondary school is in Oxted. As such, it is evident that basic amenities are available, but there remains a need for residents to seek services, including healthcare, a wider retail offer and secondary education from elsewhere and away from the local area. Oxted (4 miles), Godstone (2 miles), Lingfield (4.5 miles) and even Caterham (5 miles) as the closest service centres can provide assistance for this. The nearest GP surgery to South Godstone is Pond Tail Surgery located in Godstone, approximately 3.5km to the north.

Employment opportunities are available. South Godstone is the nearest settlement to the Strategic Employment Area of Lambs Business Park, as well as two much smaller employment areas to the east – Crow Hurst Lane and Kingswood Farm Business Park.

Just south of the village sits Lagham Manor scheduled monument. The site is also home to Lagham Manor, a Grade II* listed building, and the associated Grade II listed Brew House. The scheduled monument at Lagham Manor includes the earthworks and enclosed area of a particularly large and strongly embanked moated site. Such sites are generally seen as the prestigious residences of the Lords of the manor, the moat marking the high status of the occupier but also serving to deter casual raiders and wild animals.

An Area of Great Landscape Value (AGLV) is situated north-west of South Godstone village. The western boundary of South Godstone village comprises a belt of ancient woodland. The area is predominantly agricultural land quality grade 3. The village itself is free of flood zones 2 or 3, although there is surface water flooding risk alongside the railway line. There are also significant areas of contamination risk alongside the railway line in the village (coal yard, clay pits, landfill, gas works, storage tanks)

Since the original and existing village of South Godstone is a Tier 3 settlement, general edge of settlement development that would not form part of a Garden Settlement would not be supported by the preferred spatial strategy of the Local Plan. South Godstone is not considered to be acceptably sustainable enough in its current state, to support development which does not generate a critical mass sufficient to delivering wider infrastructure improvements.

Table 45: South Godstone Sites - Key Details, Commentary and Conclusions

Table 45a: South Godstone (Individual sites)				
SGOD 005 (South)	Posterngate Farm, South Godstone	Agricultural	Residential	Huge site. If no garden settlement then only discrete sections could be considered. Not in accordance with strategy in its own right (Tier 3), but now absorbed into Garden Settlement Area of Search.
SGOD 009	Lagham Park Farm	Agricultural	Residential	The site comprises of fields to the south west of South Godstone. The site is flat and bound to the north by a wooded bank leading up to the railway line. Not in accordance with strategy in its own right (Tier 3), but now absorbed into Garden Settlement Area of Search.
SGOD 010	Land at South Godstone	Agricultural	Residential	Huge site. If no garden settlement then only discrete sections could be considered. Part of setting of Lagham Manor medieval scheduled monument, which has a legacy of burial (contamination risk). Other areas of contamination risk on site. Ancient woodland and potential SNCI, as well as small areas of flood zone 2 and 3. Not in accordance with strategy in its own right (Tier 3), but now absorbed into Garden Settlement Area of Search.
SGOD 011	Land to the south west of South Godstone and Lagham Park Farm, The Bungalow, Eastbourne Road	Agricultural	Residential	Part of setting of Lagham Manor medieval scheduled monument, although impact would be limited by the intervening A22. Extensive surface water flooding across site. Not in accordance with strategy in its own right (Tier 3), but now absorbed into Garden Settlement Area of Search.
SGOD 012	West Godstone	Agricultural	Residential	Ancient woodland on east of site. Landscape and biodiversity issue. Not in accordance with strategy in its own right (Tier 3), but now absorbed into Garden Settlement Area of Search.
SGOD 014	Land to the west of Lagham Park	Agricultural	Residential	Ancient woodland at eastern boundary. Small discrete area of surface water flooding risk along southern boundary. Not in accordance with strategy in its own right (Tier 3), but now absorbed into Garden Settlement Area of Search.
SGOD 019	Land at Broughton House, South Godstone	Open land and grazing	Residential	Surface water flood risk at access and across site. Pond and woodland on site. Not in accordance with strategy in its own right (Tier 3), but now absorbed into Garden Settlement Area of Search.
SGOD 020	The Mount, Faygate Lane	residential and meadow	residential	Flood zone 3 across site. Partly in SNCI. Not in accordance with strategy in its own right (Tier 3), but now absorbed into Garden Settlement Area of Search.
SGOD 021	Godstone Place, Faygate Lane		Residential	Pond on site. Mature trees at boundaries. Areas of contamination risk in the vicinity (off-site). Ancient woodland south east of site. Surface water risk to west. Not in accordance with strategy in its own right (Tier 3), but now absorbed into Garden Settlement Area of Search.
Table 45b: South Godstone (Potential Further Extensions to Garden Settlement Area of Search)				
SGOD 005 (North)	Posterngate Farm, South Godstone	Agricultural	Residential	The larger southern section of SGOD 005 is part of Garden Community Area of Search. This small northern section is currently unconnected to the boundaries of a sustainable settlement. However, it could be considered as part of a broad location as it abuts the boundary of the South Godstone Area of Search, hence its consideration in the SA. Area of ancient woodland south of site forms a natural barrier to the proposed Garden Settlement. However, it is rejected as unsuitable on Landscape grounds.
SGOD 006	Land at King's farm North	Agricultural	Residential	This small TPO site is currently unconnected to the boundaries of a sustainable settlement. However, it could be considered as part of a broad location as it abuts the boundary of the South Godstone Area of Search, hence its consideration in the SA. However, it is rejected as unsuitable on Landscape grounds, and because it is woodland TPO.
SGOD 008	Lambs Business Park	Business Park	Mixed use	Protected as a 'Strategic Employment Site' and a SCC Waste allocation. Rejected for residential. Not in accordance with strategy (Not within Garden Community Area of Search and not adjacent to existing settlement) and required for employment purposes.
SGOD 013	Land at King's farm South	Woodland	Residential	This small site is currently unconnected to the boundaries of a sustainable settlement. However, it could be considered as part of a broad location as it abuts the boundary of the South Godstone Area of Search, hence its consideration in the SA. However, it is rejected on ecology and landscape grounds.
SGOD 022	Land around Norbryght	Fields and Woodland	Residential	Unsuitable in the HELAA as the site is currently unconnected to the boundaries of a sustainable settlement and is therefore not considered suitable. However, it could be considered as part of a broad location as it abuts the boundary of the South Godstone Area of Search, hence its consideration in the SA. Contains ancient woodland, ponds. Rural character. Extension rejected.

Table 46: South Godstone Sites - Assessment Matrix

Site	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport and Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity

Table 46a: South Godstone (Individual sites)

SGOD 005 (South)	++	-	-	+	-	0	+	0	-	0	0	0	-	0	-/--	0/-
SGOD 009	++	-	-	+	-	0	+	0	-	0	0/+	0	-	0	-/--	0/-
SGOD 010	++	-	-/--	+	-	0	+	0	-	0	0/-	-	-/--	0	0/-	0/-
SGOD 011	++	-	-	+	-	0	+	0	-	0	-	0	0/-	0	-/--	-
SGOD 012	++	-	-	+	-	0	+	0	-	0	0	0	-	0	?	0/-
SGOD 014	++	-	-	+	-	0	+	0	-	0	0/+	0	-	0	?	0/-
SGOD 019	++	-	-	+	-	0	+	0	-	0	-	-	-/--	0	-/--	0/-
SGOD 020	++	-	-	+	-	0	+	0	-	0	-/--	0	-	0	-/--	-
SGOD 021	++	-	-	+	-	0	+	0	-	0	0/+	0	-	0	-	-

Table 46b: South Godstone (Potential Further Extensions to Garden Settlement Area of Search)

SGOD 005 (North)	++	-	-	+	-	?	?	?	-	0	+	0	-	-	-/--	?
SGOD 006	+	-	-	?	-	?	?	?	-	0	0	0	-	-	-	--
SGOD 008	++	-	-	-	+	-	-	?/--	-	0	-	-	-	-	-	?
SGOD 013	+	-	-	?	-	?	?	?	-	0	0	-	-	-	-	--
SGOD 022	++	-	-	?	-	?	?	?	-	0	+	-	-	-	?	?

5.11.16 South Nutfield

South Nutfield was identified as a 'Rural Settlement' (Tier 3) in the Council's Settlement Hierarchy (2015).

Access to public transport in South Nutfield is very good, with Nutfield train station available in the centre of the village. Bus services also operate throughout the village, but they do not run up Kings Cross Lane. Access to shops and services in the local area is limited, there is no GP but it does have convenience food shop access and Redhill can be accessed easily from Nutfield Train Station. The nearest GP surgery to South Nutfield is Woodlands Surgery located at Redhill, approximately 3km to the west.

The village is served by Nutfield Church Primary School. The closest secondary school is The Warwick School in Redhill, which is 2.5 – 3.5km from the residential sites.

The village has two 'Important Employment Areas' in close proximity – Priory Farm to the north and Redhill Aerodrome industrial area to the south. The area has excellent access to employment opportunities in Redhill via Nutfield Train Station, which is a 5-10min train journey. The allocated employment sites will also help to maintain and enhance levels of employment in the local area.

There are three Grade II listed buildings in South Nutfield, all along the southern edge of the village. The Surrey Hills AONB is situated 1.5km north of the village. An AONB candidate area is situated to the south of the village, whilst an Area of Great Landscape Value (AGLV) abuts the village to the west.

The accessibility of public transport in this area would be expected to minimise private car use, particularly for commuting, to the benefit of local air quality. The proximity of Redhill aerodrome means there may be some noise pollution.

The area is a mix of agricultural land quality grade 3 and grade 4. A band of flood zone 3 cuts across the village, and more extensive areas exist south of the village following the path of Nutfield Brook. Most of the village is within 'Low Weald Farmland' Landscape Character Area, with northern sections being 'Wooded Greensand Hills'

There are scattered pockets of ancient woodland around the village, particularly to the east and to the north. The River Mole (Plus tributaries) Biodiversity Opportunity Area traverses the village reflecting the path of the Nutfield Brook. There are several areas of TPO in and around the village.

The Infrastructure Delivery Plan identifies a number of improvements for South Nutfield including broadband improvements and culvert improvements to Nutfield Brook.

Within this 2018 SA, Section 5.10 'SA of Options: Individual Settlements – their Status in the Strategic Settlement Hierarchy and its Implications for their Suitability for Growth' supports the conclusion that South Nutfield is not a particularly sustainable location for growth. In addition there are two smaller local areas at Brewing Research International and Dickinson House (Mid Street).

Table 47: South Nutfield Sites - Key Details, Commentary and Conclusions

SOUTH NUTFIELD				
Site	Address	Current Use	Proposed Use	SA COMMENTARY, MITIGATIONS & CONCLUSION
NUT 003	Land at Kings Cross Lane, South Nutfield	Open, overgrown land with a redundant tennis court to the eastern side	Residential	Minor Surface water flood risk on site. Rejected - Tier 3 (not a sustainable settlement and not in accordance with preferred strategy)
NUT 008	Land to the rear of properties on Kings Cross Lane, South Nutfield	Fields and orchards	Residential	Woodland on site and ancient woodland just off-site. Agricultural land quality grade 3. Rejected - Tier 3 + Ecology
NUT 010	Land east of Mid Street, South Nutfield	Farmland and related buildings.	Residential	Bounded by mature trees and hedgerows. Flood zone 3 on northern part. Rejected - Tier 3
NUT 012	Land Adjacent to Kingsmill Cottage East, Kings Cross Lane, South Nutfield, RH1 5NG	Stables and paddocks	Residential	Bounded by trees. Flood zone 3 to the south and surface water flood risk at east of site. Adjacent contamination risks (manufacturing/brick and tile works) and also historic pollution sites. Rejected - Tier 3 (not a sustainable settlement)
NUT 014	Land to the east of 131 Mid Street	Grazing land.	Residential	Boundary is defined by a mixture of hedges, fencing and trees. Agricultural land quality grade 3. Rejected - Tier 3
NUT 019	Land on the north-west side of Kings Cross Lane, Nutfield	Open land.	Residential	Ancient woodland on northern and eastern borders. Ponds in the nw corner. Rejected - Tier 3 + Ecology
NUT 020	Land to the rear of 34 Kings Cross Lane, Nutfield	Equestrian	Residential	Ancient woodland just outside the southern and eastern borders. Flood risk at northern edge. Rejected - Tier 3 + Landscape

Table 48: South Nutfield Sites - Assessment Matrix

Site	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport and Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
NUT 003	++	-	-	+	-	0	+	0	0	0	0/+	0	-	0	0	0/-
NUT 008	++	-	-	+	-	0	+	0	0	0	+	0	-	0	0/-	--
NUT 010	++	-	-	+	-	0	+	0	0	0	+	0	0/-	0	0/-	0/-
NUT 012	+	-	-	+	-	0	+	0	0	0	+	0	-/--	0	0/+	0
NUT 014	+	-	-	+	-	0	+	0	0	0	+	0	-	0	0/+	0
NUT 019	++	-	-/--	+	-	0	+	0	0	0	0/+	0	0/-	0	0/-	--
NUT 020	++	-	-	+	-	0	+	0	0	0	0/+	0	0/-	0	-/--	0/-

Redhill Aerodrome (NUT 017) has been assessed as a potential garden community site, see Section 15.13.3.

It can be concluded that South Nutfield cannot be considered a suitable location, on balance of considerations.

5.11.17 Tatsfield

Tatsfield is situated to the north-east of the village just south of Biggin Hill in neighbouring Bromley Borough. Tatsfield has a population of about 1,600 and was identified as a 'Rural Settlement' (Tier 3) in the Council's Settlement Hierarchy (2015). The village has retained a rural character which is assisted by the varied topography and woodland in the area. It has a basic level of services with good community facilities, local shops and education provision. The nearest GP surgery to Tatsfield is Stock Hill Surgery located at Biggin Hill, approximately 2km to the north.

In terms of travel, whilst Tatsfield is not directly connected to the Strategic Road Network, it is not far from the A233 to Biggin Hill and bus services also operate via Tatsfield to both Biggin Hill (4 miles) and Westerham (3 miles). There are no Tandridge employment areas in Tatsfield, although there are more employment opportunities in neighbouring Biggin Hill in the London Borough of Bromley.

The Surrey Hills AONB is just 0.5km south of the village, while the AONB candidate area abuts the village. There are two village greens in Tatsfield – Westmore Green and Tatsfield Green. There are numerous ancient woodlands in the vicinity of Tatsfield, and several group TPOs within the village. Tatsfield is relatively free of flood risk, bar a handful of narrow surface water flow paths which traverse the village. The whole village is within a groundwater source protection zone.

Within this 2018 SA, the 'SA of Options: Individual Settlements – their Status in the Strategic Settlement Hierarchy and its Implications for their Suitability for Growth' supports the conclusion that Tatsfield is not a particularly sustainable location for growth. It can be concluded, Tatsfield cannot be considered a suitable location, on balance of considerations.

Table 49: Tatsfield Site - Key Details, Commentary and Conclusions

TATSFIELD				
Site	Address	Current Use	Proposed Use	SA COMMENTARY, MITIGATIONS & CONCLUSION
TAT 005	Land to the rear of Paynesfield Road, Tatsfield	Residential gardens.	Residential	Infill site located on rear gardens, although with a frontage on Westmore Road. Within the existing settlement. Trees on site. There is no GP surgery nearby, and limited services. Surface water flood risk in north east corner and down eastern boundary. Rejected - Tier 3 (not a sustainable settlement).

Table 50: Tatsfield Sites - Assessment Matrix

Site	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport and Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
TAT 005	+	-	0	-	-	0	0	0	0	0	+	-	0	0	+	0

5.11.18 Warlingham and Whyteleafe

There are two main built up areas in Tandridge district, and Warlingham and Whyteleafe effectively form part of the northern cluster, together with Caterham. The second main built up area is the Oxted cluster just south of the M25, which includes Hurst Green and Limpsfield.

Warlingham & Whyteleafe is identified as an Urban Settlement' (Tier 1) in the Council's Settlement Hierarchy (2015). Within this 2018 SA, Section 5.10 'SA of Options: Individual Settlements – their Status in the Strategic Settlement Hierarchy and its Implications for their Suitability for Growth' supports the conclusion regarding that Warlingham & Whyteleafe is an area that can be considered a sustainable location for growth. This section considers the sustainability of individual site options.

Warlingham has an estimated population of 8,650, and Whyteleafe 3,300. There are four train stations in the area, namely Whyteleafe Station, Whyteleafe South Station, Upper Warlingham Station, and Woldingham Station which is 1km south of the boundary of the built up areas of Warlingham/Whyteleafe. All of these stations are on the western side of Warlingham and as such sites in the central and western areas of Warlingham have the closest access to these stations

Warlingham is predominantly known for its more dormitory function as a place for providing homes although it does have a local centre where shops are clustered around an area of green which serve the community. At less than 3 miles (by road) between Caterham Town Centre and Warlingham, residents also have reasonable access to additional services should they need them. That said, Warlingham is well served by services in its own right and has a range of facilities which include local shops, frequent public transport, health provision and railway stations. Elizabeth House Medical Practice and Warlingham Green Medical Practice are located in the Warlingham urban area, whilst Whyteleafe Medical Centre is located between Upper Warlingham Station and Whyteleafe Station. As well as primary schools (Warlingham Village Primary School, Hamsey Green Junior School, Whyteleafe School); Warlingham School provides access to a secondary school.

The area also has good strategic road access via the A22 which connects London to junction 6 of the M25. Whyteleafe can also be considered in a similar manner, it is well connected to larger settlements, but also has a good range of services in its own right including to railway stations, which will also serve those from the wider Caterham and Warlingham areas. Accessibility by sustainable transport will be improved by improvements to the Godstone to Whyteleafe cycle route as identified in the Infrastructure Delivery Plan.

Within the Retail Hierarchy, both Warlingham and Whyteleafe are defined as 'Local Centres', which provide some local employment. In addition, one of the four Strategic Employment Sites in the District 'Godstone Road Business Centre' is located in Whyteleafe (and is identified as suitable for expansion/intensification).

Great Farleigh Green is the only conservation area in the Warlingham area. It is unlikely to be affected by any of the sites. There are a number of Grade II listed buildings and structures in the area. These include coal-post markers in the area of Upper Warlingham Station and Whyteleafe Station. These markers were originally placed to demarcate a radius of 20 miles from the General Post Office in London, which was the point at which a levy was due on coal imported into to the City of London.

The Caterham Bourne caused flooding in 2014, although this comprises a narrow band of flood zone 3 down the west side of Whyteleafe. A couple of other narrow surface water flow paths through the area. In addition, the whole area is a groundwater source zone, so water quality is a key consideration.

The Surrey Hills AONB is situated to the south of Whyteleafe and south west of Warlingham. The Area of Great Landscape Value (AGLV) is located to the east of the settlement.

The North Downs Scarp Biodiversity Opportunity Area sits just south of Warlingham and Whyteleafe and this includes areas of deciduous woodland (including ancient woodland) and SNCI. Areas of ancient woodland and SNCI also exist in the intervening land between Whyteleafe and Caterham. There is also a Local Nature Reserve in Warlingham - Blanchman's Farm LNR.

The Infrastructure Delivery Plan identifies notable improvements for the area including Warlingham Primary School expansion and re-provision, an Indoor Sports Hall, Whyteleafe Surgery extension, and real time information bus stops.

Table 51: Warlingham & Whyteleafe Site - Key Details, Commentary and Conclusions

WARLINGHAM				
Site	Address	Current Use	Proposed Use	SA COMMENTARY, MITIGATIONS & CONCLUSION
WAR 005	282 Limsfield Road, Warlingham	South field is playing fields. Central area is an outdoor swimming pool, club house, car parking, and hard standing pitches. North area is overgrown scrub land.	Residential	Recreation ground, although part inaccessible to public and parts appear disused. Northern scrub is identified as contamination risk from former brickworks and quarry landfill. Woodland at boundaries and TPOs on site. Within impact zone of Riddlesdown SSSI impact zone. Areas of surface water flood risk. Well related to settlement services and would represent a location that facilitates sustainable choices for new residents. Sustainable oin balance of considerations. Allocated
WAR 008	Land north of Greenhill Lane, Warlingham	agricultural	Residential	Evidence shows it has low landscape capacity and it is rejected as unsustainable for this reason.
WAR 011	Green Hill Lane, Warlingham	Woodland and grazing.	Residential	Loss of trees and biodiversity issues, balanced against ate fact there is considerable housing need and Warlingham is a sustainable settlement. Contained from wider landscape. Access improvements required. Sustainable oin balance of considerations. Allocated.
WAR 012	Land at Farleigh Road	Grazing paddock and riding school.	Residential	Area of ancient woodland to the north-east. Equestrian uses have some economic/tourism value. Areas of surface water flooding risk centrally located. Public footpath running through the centre of the site. Adjacent contamination risks. Good pedestrian connectivity to town centre services, which increases the sites sustainability. Allocated
WAR 016	Edgeworth Close, Warlingham	Car park amd amenity land	Residential	Some loss of trees and amenity land possible. Possible access and congestion issues from loss of parking. Although current uses do not make the best use of a valuable site in a sustainable settlement, located in close proximity to train station. Sustainable oin balance of considerations. Allocated
WAR 018	Land adjacent to Kennel farm, Chelsham	agricultural	Residential	Not adjacent to settlement so not a sustainable extension. Trees on site and at boundary. Failed Green Belt exceptional circumstances test.
WAR 019	Former Shelton Sports Club, Warlingham	former sports pitches and pavillion	Residential	Established sports and recreation use, though appears disused and not publicly accessible, so not a good use of a site that is cetrally located to access services and facilitate sustainable lifestyles. Relocation has a resource implication (Obj.9). Surrounded by woodland which screen it from wider landscape. Adjacent to area of contamination risk. Sustainable oin balance of considerations. Allocated
WAR 023	Land at Alexandra Avenue	Horse paddock, a hay storage facility and allotment.	Residential	Mill Common is opposite. Limited environmental constraints, so a reasonably sustainable option given the level of housing need. Allocated
WAR 025	Land at Farm Road, Warlingham	Stable blocks and grazing land.	Residential	Ancient woodland at boundary and SNCI in close proximity. Adjacent to LNR to north-wesr. Failed Green Belt exceptional circumstances test
WAR 029	West of Farleigh Road	Paddocks and grazing.	Residential	Ancient woodland at south-west boundary. TPO to north. Bounded by trees and hedges. Adjacent to area of contamination risk (Old Dairy). Rejected - Landscape
WAR 035	Galloway Lodge, High Lane, Warlingham	Residential, gardens, sand school and field	Residential	Access issues. Woodland TPO to the east. Adjacent to LNR. Rejected - Ecology + failed Green Belt exceptional circumstances test.
WAR 036	Land to the west of Limsfield Road, Warlingham	Sports pitches and fields, plus a small paddock.	Residential	The total site submission contains not only the land proposed for residential development (3.95ha), but also land to the west of that would be redeveloped to provide enhanced sporting facilities (approximately 8ha). The proposal would be that the existing sports ground would be redeveloped to provide housing development in order to develop new and enhanced facilities on adjacent land, identified as part of this site. Replacement pich facilities may also be provided within the new Garden Community, central in the District in the longer term. The site itself offers a sustainable location for residential development, well located to the centre of Warlingham services and wil help facilitate sustainable lifestyles. Sustainable oin balance of considerations. Allocated
WAR 038	Land west of The Green and land at Westhall Road	Grazing land and allotment.	Residential	Rejected - Part allotment, 'green-lung' forming part of local character. Loss of greenspace enclosed within wider urban area may exacerbate heat island effects (Objective 10). Nearby contamination risk. Grade II listed building east of the site and TPOs.
WAR 039	8 Beechwood Lane	Residential - dwelling and large garden.	Residential	LNR/SNCI to north, ancient woodland to south. Site represents the remaining green gap between two intervening areas of countryside. Intensification of development would reduce connectivity of green areas, contrary to sustainability and rural character. Access down country lane does not appear suitable from highways/safety perspectives for increased development of any significant scale. Failed Green Belt exceptional circumstances test.
WHY 010	Land at Torwood Farm, Whyteleafe	Animal sanctuary	Residential	Ancient woodland in south-west corner and off-site to north-east. Proposed SNCI to south which is also deciduous woodland (BAP priority habitat). Site is connecting corridor to wider networks. Rejected as unsuitable and unsustainable from an ecological perspective, and also failed Green Belt exceptional circumstances test.

Table 52: Warringham & Whyteleafe Site - Assessment Matrix

Site	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport and Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
WAR 005	++	+	0	++	-	0	+	0	0	0/-	0/+	-/--	-/--	0	0/+	0/-
WAR 008	++	++	-	++	-	0	+	0	+	0	+	-	-	+	-/--	0
WAR 011	+	++	-	++	-	0	+	0	+	0	+	-	-	+	0/+	-
WAR 012	+	++	-	++	-	0	+	0	+	0	+	-	-	+	0/-	0/-
WAR 016	+	+	0	++	0	0	+	0	+	0	+	-	0	+	0/-	0/-
WAR 018	++	-	-	++	-	0	+	0	+	0	+	-	-	0	0/-	0
WAR 019	++	+	0	++	-	0	+	0	-	0	+	-	-	+	0/+	0/-
WAR 023	+	++	-	++	-	0	+	0	+	0	+	-	-	+	0/+	0
WAR 025	+	++	-	++	-	0	+	0	+	0	+	-	0	+	0/+	0
WAR 029	++	++	-	++	-	0	+	0	+	0	+	-	-/--	+	-/--	0
WAR 035	++	+	-	++	-	0	+	0	+	0	+	-	-	+	0/-	-
WAR 036	++	+	0	+	-	0	+	0	0	0/-	0	-/--	-/--	0	0/+	0
WAR 038	++	?/--	-	++	-	0	+	0	?/-	-	0/+	-	?/-	0	0/-	0
WAR 039	+	++	-	++	-	0	+	0	+	0	+	-	0	+	0	0/-
WHY 010	++	++	-	++	-	0	+	0	+	0	+	-	0	+	+	-

The assessment table below shows the assessments carried out in 2016, with short hand reference used to identify each site. Note that within the 2016 SA, Whyteleafe was considered as part of Caterham.

5.12 SA of Potential Employment Sites

5.12.1 Consideration of Sites for Employment

Paragraph 161 of the NPPF states that “Local planning authorities should use the evidence base to assess the existing and future supply of land available for economic development and its sufficiency and suitability to meet the identified needs”.

A Tandridge Economic Needs Assessment (ENA) was undertaken on the Council’s behalf by Aecom in 2015, followed by an update by GL Hearn in 2017. The ENA provides an estimate of the district’s future need for employment land, an assessment of the development opportunities at existing sites in the district and any residual requirement. The findings of the ENA are used by the HELAA to inform the assessment of employment sites ensuring that sites in current employment use are a factor for the HELAA.

Chapter 6 of the ENA 2017 provides a review of existing and potential employment land within the district. This list has provided the basis of reasonable alternatives assessed as part of Sustainability Appraisal.

5.12.2 Classification of Sites

Within the SA and HELAA, sites referred to as ‘ENA 00’ are employment sites with ENA standing for ‘Economic Needs Assessment’. There are a handful of exceptions to this rule, where sites submitted to the HELAA for employment uses have a location specific ID (e.g. DOR 009).

There is also a separate numbering ID system within the two Economic Needs Assessments, but the two different site references can be cross-referred with reference to Table 53 and Map 4 below.

5.12.3 Consideration of Options

Some employment sites were assessed in the 2016 SA, but have subsequently been investigated by three separate site-specific pieces of evidence – landscape, ecology and economic needs assessment. As such they have been given full reconsideration here in view of updated circumstances, and also in view of the specific sustainability considerations for employment land (see Table 54).

The ENA site surveys included an assessment of site’s suitability and its development potential including its ability to be intensified and/or expanded. Reference is made to the information included within the ENA in the Summary Table 39 below, but the full assessment is not replicated here. This has in turn been reflected in the scores of SA objectives 6 and 7. Sites identified in the ENA as being suitable to expand, or of such value that they warrant protection within policy, have been given a maximum positive score in the SA. Sites with existing employment that is likely to remain as such (i.e. not likely to be suitable for conversion to residential) has a minor positive. Sites with no existing employment or potential have a neutral score for objectives 5 and 6.

As set out in Local Plan Policy TLP21, an Employment Hierarchy has been defined for employment sites; consisting of Strategic Employment Sites (SES), Important Employment Sites (IES) and all other existing sites. Only SESs and IESs will be allocated in the Local Plan, which will provide sufficient space to meet the Local Plans’ identified need of at least 15.3ha (which was itself subject to SA – see section 5.9). Therefore, the vast majority of sites that have been included in the SA below are already existing employment sites that have been considered in the plan for intensification. There are just three sites that are not currently in employment use but are ‘potential’ sites.

In total 19 sites were considered to have intensification opportunities in the Economic Needs Assessment amounting to over 26ha of potential employment land (see Table 55). However, not all were allocated, for reasons set out in Table 40.

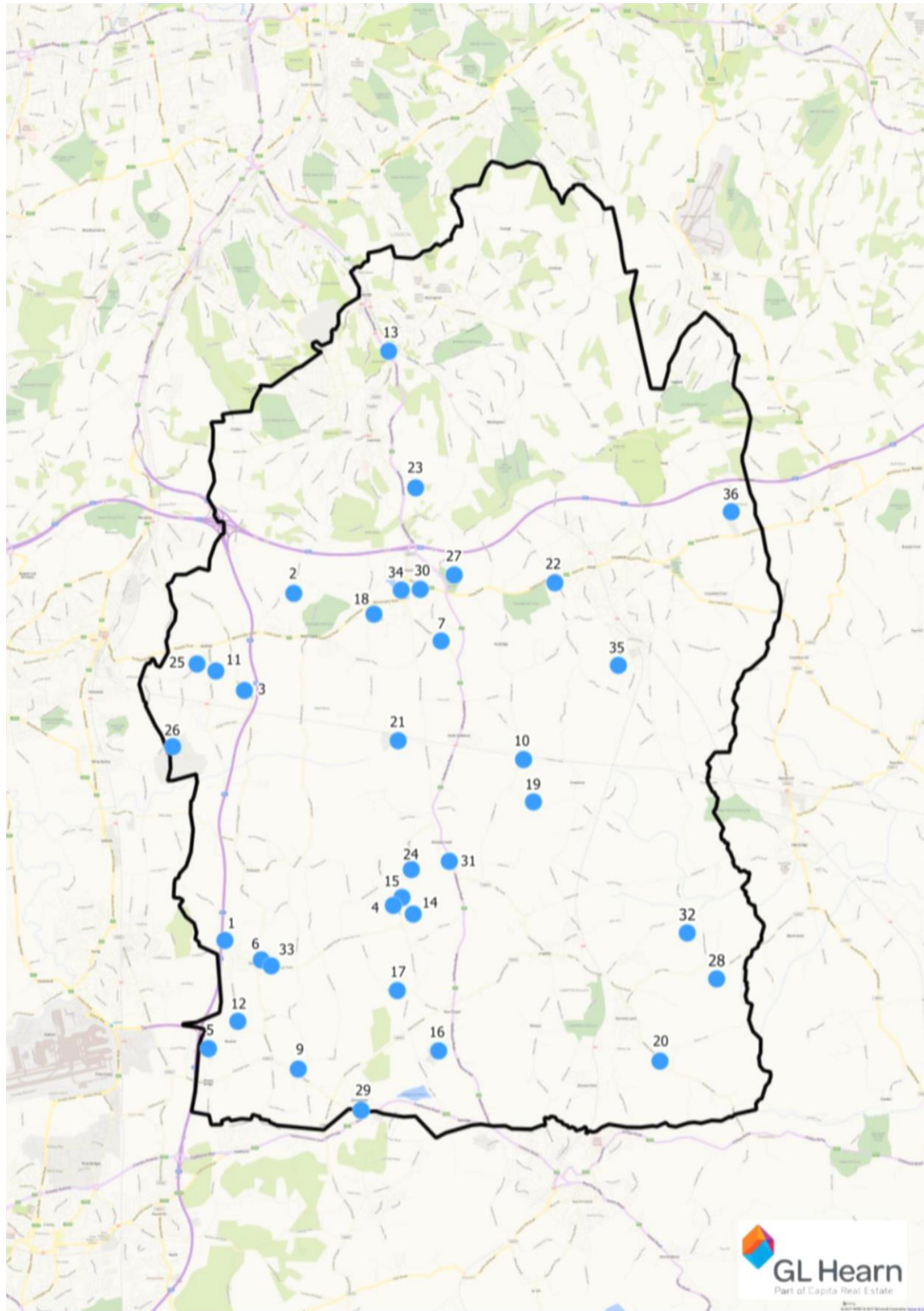
Table 53: Summary of Employment Sites (continues overleaf)

Site ID	Status - (Existing or potential employment site)	No. on map	Site	Nearest Settlement	Size (ha)	Reviewed in 2017 ENA	Considered to have intensification opportunity in ENA Update 2017	Conclusion	Categorisation	Intensification Opportunity	Intensification Opportunity (Ha)	Use class	Pre-Submission Local Plan (June 2017)
ENA 17	Potential (Existing Highways Depot)	1	Balfour Beatty Site	Smallfield	1.81	Yes	No	Conclusion: The site is not currently in employment use and is likely to remain in use as a depot for Highways England. The site therefore cannot be considered to contribute to the district's employment land supply at this time. The site does represent a potential longer term opportunity for redevelopment for employment uses.'	N/a				Not allocated
ENA 30	Existing	2	Brewer Street	Bletchingley	2.38	Yes	Yes	Recommended to be protected. Scope for intensification.	Important Employment Sites	Vacant land / Dilapidated unit	1.22	Mix B1/B2/B8	Allocation
ENA 28	Existing	3	Brewing Research International	South Nutfield	0.74	Yes	No	Not in 2017 ENA 2015 ENA: Quality of environment / public realm: Good. Conditions of buildings: Very good. Vacant and available floorspace: None.	N/a				Not allocated
ENA 21	Existing	4	Brickhouse Farm Trading Estate	Blindley Heath	1.63	Yes	Yes	Brickhouse Farm Trading Estate consists of converted agricultural buildings. There is a mix of employment and residential uses, as well as a scrap metal business which occupies a part of the site. There is also a significant part of the site taken up by open storage. Occupiers are mostly small industrial or car repair uses. Conclusion: Brickhouse Farm Trading Estate offers a good mix of units of reasonable quality, however some existing uses such as the scrap metal business could be considered commercially unattractive as they cause noise and traffic. Recommend no specific policy response.	Local Employment Sites	Vacant land	0.48	B2/B8	Not allocated
ENA14	Existing (Vacant)	5	Bridges Wood, Church Lane	Burstow	6.17	Yes	Yes	Brides Wood is a disused former industrial site located in a rural location. Conclusion: The site is in close proximity to Gatwick Airport and provides an opportunity for commercial development relating to, or benefiting from, the Airport. However the existing site is in a poor state of repair and vehicular access to the site is poor. The site is not considered deliverable at this time and therefore no specific policy response is recommended. The site could potentially form a larger development opportunity as part of a long-term development of the Burstow & Shipley Bridge site.	Other sites	Vacant land / Dilapidated unit	4.15	Mix B1/B2/B8	Not allocated
ENA 18	Existing	6	Brown Utilities	Smallfield	0.49	Yes	Yes	Brown Utilities is a small-scale industrial estate within Smallfield. The whole site is bounded by residential uses and access is good but also shared with the residential neighbouring uses (Chapel Lane). Conclusion: The site has poor access to the strategic road network and is tightly bounded by residential uses limiting commercial attractiveness and development potential for more intensive employment uses. Recommend taking a flexible approach to future development and alternative (non-B Class) uses be considered.	Other sites	Vacant land	0.02	B1	Not allocated
ENA 06	Existing	7	Builders Merchants	Godstone	1.37	Yes	No	A single user site, occupied by Fairalls Building Materials. Conclusion: Single occupier site mostly used for open storage. Future use / intensification of site depends on current occupier. Recommend no specific policy response.	N/a				Not allocated
SMA 38 (emp)	Potential	8	Land East of Junction 9 on the M23 (Burstow & Shipley Bridge)	Burstow	40	Yes	No	Conclusion: The site has the potential to provide a new largescale employment site with excellent access to Gatwick Airport and the motorway. This could potentially support a considerable quantum of a range of employment uses. However, the significant highways works, and associated feasibility and viability considerations, as well as other constraints mean that any development at the site would not be likely to come forward in the short term. However, the site does represent an excellent location for employment development from a market perspective, and the potential for development of the site in the long-term should be explored further by the Council.	N/a				Not allocated
ENA 16	Existing	9	Cophall Farm	Domewood	8	Yes	Yes	Conclusion: The site is considered commercially attractive and it is recommended that it is protected for employment uses and that further use of the site for airport car parking use is resisted.	Important Employment Sites	Vacant land	4.15	B8	Allocation
ENA 24	Existing	10	Crow Hurst Lane	Crowhurst Lane End	0.34	Yes	No	Conclusion: Small local employment site in rural location with limited access to the strategic road network. Recommend no specific policy response.	N/a				Not allocated
ENA 10	Existing	11	Dickinson House (Mid Street)	South Nutfield	0.43	Yes	Yes	Conclusion: The site offers a mix of office units in reasonable condition and dilapidated units in poor condition. Further intensification of the site would require a significant investment; however the location is not considered to be particularly commercially attractive. Recommend taking a flexible approach to uses permitted at this site.	Other sites	Vacant land / Dilapidated unit	0.08	Mix B1/B2/B8	Not allocated
ENA 15	Existing	12	Flightpath Farm	Burstow	1.79	Yes	Yes	Conclusion: Small scale rural site not in a particularly commercially attractive location. Recommend no specific policy response.	Local Employment Sites	Vacant land	0.3	B2/B8	Not allocated
ENA 01	Existing	13	Godstone Road Business Centre	Warlingham	2.09	Yes	No	Conclusion: The site offers high quality office units; it is located at a very accessible place and is performing well with no occupancy. The site is one of the district's key strategic employment sites and should be retained as such. Employment uses at these sites should be protected and development for alternative uses should be resisted.	N/a				Allocation
ENA 031	Existing	14	Hays Bridge Farm	Blindley Heath	1.86	Yes	Yes	Conclusion: The site is not considered to be commercially attractive for employment uses due to the poor quality environment, rural location, and recycling uses at the site. Recommend the site is not protected for employment uses and the Council take a flexible approach to development at the site and alternative uses considered.	Other sites	Dilapidated units	0.29	Non B class	Not allocated
ENA 20	Existing	15	Haysbridge Business Centre	Blindley Heath	1.02	Yes	Yes	Conclusion: The site provides small scale workshop units which cater for predominantly local demand in a rural location. There is an opportunity for a small quantum of development. Recommend no specific policy response.	Local Employment Sites	Vacant land	0.18	Mix B1/B2/B8	Not allocated
ENA 22	Existing	16	Hobbs Industrial Estate	Felbridge-	22	Yes	Yes	Conclusion: The site offers a very good quality employment stock, with good access and clearly well occupied. The site is one of the district's key strategic employment sites and should be retained as such. Employment uses at these sites should be protected and development for alternative uses should be resisted.	Key Strategic Employment Site	Vacant land	3.88	Mix B1/B2/B8	Allocation

Table 53: Summary of Employment Sites (continued from previous page)

Site ID	Status - (Existing or potential employment site)	No. on map	Site	Nearest Settlement	Size (ha)	Reviewed in 2017 ENA	Considered to have intensification opportunity in ENA Update 2017	Conclusion	Categorisation	Intensification Opportunity	Intensification Opportunity (Ha)	Use class	Pre-Submission Local Plan (June 2017)	
ENA 19	Existing	17	Hoppings Bones Lane Timber Yard	Newchapel-	1.58	Yes	No	Conclusion: Single occupier site in rural location. A large proportion of the site is used for open storage and any intensification of employment use would depend on the existing occupier. Recommend no specific policy response.	N/a				Not allocated	
ENA 04	Existing	18	Ivy Mill Lane Workshops	Godstone	1.92	Yes	No	Conclusion: The site is a standalone site located reasonably close to the A25, although site access is via a small country road making the site less commercially attractive. Recommend no specific policy response.	N/a				Not allocated	
ENA 25	Existing	19	Kingswood Farm Business Park	Lingfield	1.03	Yes	Yes	Conclusion: The site offers opportunities for intensification, however the overall quality of the environment is not considered to be commercially attractive. Recommend no specific policy response.	Local Employment Sites	Dilapidated unit	0.1	B2/B8	Not allocated	
ENA 23	Existing	20	Ladycross Business Park	Dormansland	1	Yes	Yes	Conclusion: Despite the site's rural location, the site offers high quality small office accommodation and is performing well. Recommend protecting the site for employment uses.	Key Strategic Employment Site	Vacant land	0.22	Mix B1/B2/B8	Not allocated	
ENA 12	Existing	21	Lambs Business Park	South Godstone	12.8	Yes	Yes	Conclusion: The site is one of the larger employment locations in the district offering a good range and quality of employment stock. The site is one of the district's key strategic employment sites and should be retained as such. Employment uses at these sites should be protected and development for alternative uses should be resisted.	Key Strategic Employment Site	Vacant land	7.44	Mix B1/B2/B8	Allocation	
ENA 29	Existing	22	Oxted Colour Printers	Oxted	0.38	Yes	No	Conclusion: Small employment site in Oxted providing provision for local businesses. Recommend the Council take a flexible approach and consider proposals for alternative (non B-class) uses at the site.	N/a				Not allocated	
ENA 02	Existing	23	Paddock Barn Farm, Godstone Road	Caterham	3.45	Yes	Yes	Conclusion: The southern part of the site is located on the A22 and M25 providing good access and frontage onto the main road. This part of the site provides an opportunity for further industrial or warehouse uses and should be protected for employment uses. No specific policy approach is recommended for the northern part of the site.	Important Employment Sites	Vacant land	0.44	Mix B1/B2/B8	Allocation	
ENA 13	Existing	24	Parkwood Industrial Estate	Blindley Heath	0.74	Yes	No	Conclusion: The site is considered to be relatively commercially attractive for local occupiers, with reasonable access to main transport routes. Recommend no specific policy response.	N/a				Not allocated	
ENA 09	Existing	25	Priory Farm	South Nutfield	1.46	Yes	No	Conclusion: The site is of good quality providing good quality small office and retail units, with reasonable location and is fully occupied. It is recommended that employment generating uses are supported and protected at the site.	N/a				Allocation	
ENA 11	Existing	26	Redhill Aerodrome	South Nutfield	6.68	Yes	Yes	Conclusion: The site is performing well for businesses relating to the aviation industry and benefiting from the proximity to the airfield. The future performance and attractiveness of the site will be strongly influenced by the viability and future operation of the airfield, and potential proposals relating to the garden village development.	Local Employment Sites	Redevelopment underway[1]	0.43	B1/B8	Allocation	
ENA 05	Existing	27	Rooks Nest Farm, Godstone Road	Godstone	0.82	Yes	Yes	Conclusion: Development for replacement of B8 unit currently underway. The location is considered commercially attractive with good access to the strategic road network. Recommend no specific policy response.	Local Employment Sites	Redevelopment underway[2]	0.56	B1/B8	Not allocated	
DOR 00	Existing	28	Skitts Manor Farm	Dormansland	0.39	Yes	No	Conclusion: The site is very constrained in terms of access and the location is not commercially attractive. The overall quality of the site is not considered to be commercially attractive. Recommend no specific policy response.	N/a				Not allocated	
ENA27	Existing	29	Snowhill Business Centre	Copthorne	0.35	Yes	Yes	Conclusion: Small site in a reasonably commercially attractive location which offers high quality small office accommodation. Recommend the site is protected for employment uses.	Important Employment Sites	Vacant land	0.03	B1	Allocation	
ENA 33	Potential (Existing Depot)	30	Surrey County Council Depot	Godstone	2.22	Yes	No	Not a reasonable option. Conclusion: The site is not currently in employment use and there is little prospect for redevelopment / intensification for employment uses. The site cannot therefore be considered as part of the Council's employment land supply.					Not allocated	
ENA 26	Existing	31	Systems House	Blindley Heath	0.98	Yes	No	Conclusion: The site is considered to be of reasonable commercial quality and it is recommended to be retained for employment uses.	N/a				Allocation	
DOR 01	Existing	32	Telescope House , Starborough Farm	Lingfield	0.44	Yes	Yes	Conclusion: The site is located in a very isolated rural setting, and is accessed via a small country road. The overall quality of the site is not considered to be commercially attractive. Recommend no specific policy response.	Local Employment Sites	Vacant land	0.05	B1/B8	Not allocated	
ENA 32	Existing	33	The Old Norton Site	Smallfield	0.49	Yes	No	Conclusion: Small site comprising average quality building stock. Recommend no specific policy response.	N/a				Not allocated	
ENA 03	Existing	34	Timber Merchant	Godstone	0.66	Yes	No	Conclusion: The site is considered to be commercially attractive as it is well utilised and easily accessible from the A25. Recommend no specific policy response.	N/a				Not allocated	
ENA 07 & OXT 67	Existing	35	Warren Lane Depot	Oxted	0.9	Yes	No	Conclusion: The site is currently in use as a Council depot and is not considered to be commercially attractive for employment uses. It is recommended that the site is not protected for employment use and recommend alternative uses are considered.	N/a				Not allocated	
ENA 08	Existing	36	Westerham Road Industrial Estate	Westerham	8.61	Yes	Yes	Conclusion: The site is in an attractive location with good access onto the A25. The site is considered commercially attractive for current B8 and related uses. The site is one of the district's key strategic employment sites and should be retained as such. Employment uses at these sites should be protected and development for alternative uses should be resisted.	Key Strategic Employment Site	Vacant land	2.84	B2/B8	Allocation	
											Total Scope for Intensification	26.86	Allocated	20.65 ha

Map 4: Location of existing and potential employment sites reviewed



Source: Economic Needs Assessment Update 2017

Table 54: Summary of SA Assessments of Employment Sites (continues overleaf)

ID	Status - Existing or Potential	No. on map	Site	Nearest Settlement	Size (ha)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	Sustainability Conclusions
						Housing	Health	Cultural Heritage	Transport & Services	P. Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity	
ENA 17	Potential (Existing Highways Depot)	1	Balfour Beatty Site	Smallfield	1.81	o	o	-	+	+	o	o	o	o	o	- / - -	-	o	o	o	o	Likely to remain in use as a depot for Highways England. The site therefore cannot be considered to contribute to the district's employment land supply at this time. Flood risk issues
ENA 30	Existing	2	Brewer Street	Bletchingley	2.38	o	o	- / - -	-	+	++	++	o	-	o	+	- -	o	o	o / -	o / -	Preferred site for Allocation. Water quality issue (groundwater source zone)
ENA 28	Existing	3	Brewing Research International (South Nutfield	0.74	o	-	-	-	+	+	+	o	o	o	o	o	o	o	o	o	No vacant and available floorspace.
ENA 21	Existing	4	Brickhouse Farm Trading Estate	Blindley Heath	1.63	o	o	-	-	+	+	+	o	o	o	-	-	o	-	o	o	Some existing uses such as the scrap metal business could be considered commercially unattractive as they cause noise and traffic. Recommend no specific policy response.
ENA14	Existing (Vacant)	5	Bridges Wood, Church Lane	Burstow	6.17	o	o	-	-	+	o	o	o	o	o	-	-	o	-	o	o	The site is not considered deliverable at this time and therefore no specific policy response is recommended.
ENA 18 (which is SMA 015)	Existing	6	Brown Utilities	Smallfield	0.49	? / +	-	-	+	+	+	+	o	o	o	- -	-	o	-	o	o	The site has poor access to the strategic road network and is tightly bounded by residential uses limiting commercial attractiveness and development potential for more intensive employment uses. Recommend taking a flexible approach to future development and alternative (non-B Class) uses be considered. Flood risk issues
ENA 06	Existing	7	Builders Merchants	Godstone	1.37	o	o	- / - -	+	+	+	+	o	o	o	o / +	o	o	o	o	o	Single occupier site mostly used for open storage. Future use / intensification of site depends on current occupier. Recommend no specific policy response.
SMA 38 (emp)	Potential	8	Land East of Junction 9 on the M23 (Burstow & Shipley Bridge)	Burstow	40	o	o	-	+	-	? / ++	? / ++	? / ++	o	o	- / - -	- / - -	o	o	- / - -	o / -	Significant highways works, and associated feasibility and viability considerations, as well as other constraints mean that any development at the site would not be likely to come forward in the short term. Flood risk and water quality issues. Landscape impact
ENA 16	Existing	9	Cophall Farm , Cophorne	Domewood	8	o	o	-	-	+	++	++	o	o	o	o	o	o	o	o	o / -	Preferred site for Allocation
ENA 24	Existing	10	Crow Hurst Lane	Crowhurst Lane End	0.34	o	o	-	-	+	+	+	o	o	o	o / +	o	o	o	o	o	Conclusion: Small local employment site in rural location with limited access to the strategic road network. Recommend no specific policy response.
ENA 10	Existing	11	Dickinson House (Mid Street)	South Nutfield	0.43	? / +	? / -	-	o	+	+	+	o	o	o	+	o	o	o	o	o	The location is not considered to be particularly commercially attractive.
ENA 15	Existing	12	Flightpath Farm	Burstow	1.79	o	o	- / - -	-	+	+	+	o	o	o	o	o	o	o	o	o	The location is not considered to be particularly commercially attractive.
ENA 01	Existing	13	Godstone Road Business Centre	Warlingham	2.09	o	o	o	+	+	++	++	o	o	o	- / - -	- -	o	o	o	o	Preferred site for Allocation. Flood risk and water quality issues.
ENA 031	Existing	14	Hays Bridge Farm	Blindley Heath	1.86	o	o	-	-	+	? / +	? / +	o	o	o	- -	-	o	o	o	o	The location is not considered to be particularly commercially attractive. Flood risk.
ENA 20	Existing	15	Haysbridge Business Centre	Blindley Heath	1.02	o	o	-	-	+	+	+	o	o	o	o / +	o	o	o	o	o	ENA recommends no specific policy response.
ENA 22	Existing	16	Hobbs Industrial Estate	Felbridge-	22	o	o	- / - -	-	+	++	++	o	o	o	+	o	o	? / - -	o	o / -	Preferred site for Allocation. Within 800m of a WwTW - odour assessment required. Within Impact Risk Zone of Hedgecourt SSSI.

Table 54: Summary of SA Assessments of Employment Sites (continued from previous page)

ID	Status - Existing or Potential	No. on map	Site	Nearest Settlement	Size (ha)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	Sustainability Conclusions	
						Housing	Health	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity		
ENA 19	Existing	17	Hoppings Bones Lane Timber Yard	Newchapel-	1.58	o	o	-	-	+	+	+	o	o	o	+	o	o	o	o	o	o	Single occupier site in rural location any intensification of employment use would depend on the existing occupier. Recommend no specific policy response.
ENA 04	Existing	18	Ivy Mill Lane Workshops	Godstone	1.92	o	o	-	o	+	+	+	o	o	o	--	--	o	o	o	o	o	The location is not considered to be particularly commercially attractive. Flood risk and water quality issues.
ENA 25	Existing	19	Kingswood Farm Business Park	Lingfield	1.03	o	o	-	-	+	+	+	o	o	o	+	o	o	o	o	o	o	The location is not considered to be particularly commercially attractive.
ENA 23	Existing	20	Ladycross Business Park	Dormansland	1	o	o	--	-	+	++	++	o	o	o	+	o	o	o	o	-/--	o	Although an ENA recommendation, this site is not suitable for intensification for landscape impact reasons.
ENA 12	Existing	21	Lambs Business Park	South Godstone	12.8	o	?/-	-	?	+	++	++	o	o	o	o/+	o	o	o	o	o	o/-	Preferred site for Allocation
ENA 29	Existing	22	Oxted Colour Printers	Oxted	0.38	+/+	o	-/--	o	+	+/+	+/+	o	o	o	o/+	o	o	o	o	o	o	ENA recommends the Council take a flexible approach and consider proposals for alternative (non B-class) uses at the site.
ENA 02	Existing	23	Paddock Barn Farm, Godstone Road	Caterham	3.45	o	o	-	+	+	++	++	o	o	o	+	--	o	o	o/-	o	Preferred site for Allocation. Water quality issue (groundwater source zone)	
ENA 13	Existing	24	Parkwood Industrial Estate	Blindley Heath	0.74	o	o	-	-	+	+	+	o	o	o	o/-	o	o	o	o	o	o	The site is considered to be relatively commercially attractive for local occupiers, with reasonable access to main transport routes. ENA recommends no specific policy response.
ENA 09	Existing	25	Priory Farm	South Nutfield	1.46	o	o	-	-	+	++	++	o	o	o	o	o	o	o	o	o/-	o	Preferred site for Allocation
ENA 11	Existing	26	Redhill Aerodrome	South Nutfield	6.68	o	o	o/-	o	+	++	++	o	o	o	o/-	o	o	o/-	o/-	o	o	Preferred site for Allocation
ENA 05	Existing	27	Rooks Nest Farm, Godstone Road	Godstone	0.82	o	o	-	o	+	+	+	o	o	o	o/+	--	o	o	o	o	o	Development for replacement of B8 unit currently underway. ENA recommends no specific policy response. SA shows water quality issue.
DOR 009	Existing	28	Skitts Manor Farm	Dormansland	0.39	o	o	-	-	+	+	+	o	o	o	+	-	o	o	o	o	o	The location is not considered to be particularly commercially attractive.
ENA27	Existing	29	Snowhill Business Centre	Cophorne	0.35	o	o	-	-	+	++	++	o	o	o	o/+	o	o	o	o	o	o	Preferred site for Allocation
ENA 33	Potential (Existing Depot)	30	Surrey County Council Depot	Godstone	2.22	o	o	-	+	+	o	o	o	o	o	o/+	--	o	o	o	o	o	The site is not currently in employment use and there is little prospect for redevelopment / intensification for employment uses. Water quality issue.
ENA 26	Existing	31	Systems House	Blindley Heath	0.98	o	o	-	o/-	+	++	++	o	o	o	-	o	o	o	o	o/+	o	Preferred site for Allocation
DOR 010	Existing	32	Telescope House , Starborough Farm	Lingfield	0.44	o	o	-	-	+	+	+	o	o	o	+	o	o	o	o	o	o	The location is not considered to be particularly commercially attractive.
ENA 32	Existing	33	The Old Norton Site	Smallfield	0.49	o	o	-	+	+	+	+	o	o	o	-	--	o	o	o	o	o	Small site comprising average quality building stock. Recommend no specific policy response. SA shows water quality issue.
ENA 03	Existing	34	Timber Merchant	Godstone	0.66	o	o	-	+	+	+	+	o	o	o	+	--	o	o	o/+	o	o	ENA recommends no specific policy response. SA shows water quality issue.
ENA 07 (OXT 67)	Existing	35	Warren Lane Depot (Emp)	Oxted	0.9	?/--	?/-	o	o/+	+	o	o	o	-	o	+	+	?/-	?/--	o/+	o/-	o	The site is currently in use as a Council depot and is not considered to be commercially attractive for employment uses. It is recommended that recommend alternative uses are considered. SA shows potential air quality issue from proximity to waste water plant.
ENA 08	Existing	36	Westerham Road Industrial Estate	Westerham	8.61	o	o	-	-	+	++	++	o	o	o	o	--	o	o	o/-	o	o	Preferred site for Allocation. SA shows water quality issue.

Table 55- Sites with Intensification Opportunities

Site Name	Type	Area (ha)	Use class
Key Strategic Employment Site			14.16
Hobbs Industrial Estate	Vacant land	3.88	Mix B1/B2/B8
Lambs Business Park	Vacant land	7.44	Mix B1/B2/B8
Westerham Road Industrial Estate	Vacant land	2.84	B2/B8
Important Employment Sites			6.06
Brewer Street	Vacant land / Dilapidated unit	1.22	Mix B1/B2/B8
Cophall Farm	Vacant land	4.15	B8
Ladycross Business Park	Vacant land	0.22	Mix B1/B2/B8
Paddock Barn Farm, Godstone Road	Vacant land	0.44	Mix B1/B2/B8
Snowhill Business Centre	Vacant land	0.03	B1
Local Employment Sites			2.1
Brickhouse Farm Trading Estate	Vacant land	0.48	B2/B8
Flightpath Farm	Vacant land	0.3	B2/B8
Haysbridge Business Centre	Vacant land	0.18	Mix B1/B2/B8
Kingswood Farm Business Park	Dilapidated unit	0.1	B2/B8
Redhill Aerodrome	Redevelopment underway[1]	0.43	B1/B8
Rooks Nest Farm, Godstone Rd	Redevelopment underway[2]	0.56	B1/B8
Telescope House	Vacant land	0.05	B1/B8
Other sites			4.54
Bridges Wood, Church Lane	Vacant land / Dilapidated unit	4.15	Mix B1/B2/B8
Brown Utilities	Vacant land	0.02	B1
Dickinson House (Mid Street)	Vacant land / Dilapidated unit	0.08	Mix B1/B2/B8
Hays Bridge Farm	Dilapidated units	0.29	Non B class
Total (All Sites)			26.86
[1] Permission to replace fire damaged units.			
[2] Construction of employment land currently underway.			

Source: ENA Update 2017

5.13 SA of Garden Community Location

5.13.1 Background

The 2017 Sustainability Appraisal of potential garden village locations previously assessed ten possible sites. This has subsequently been reduced to three reasonable options:

1. South Godstone
2. Blindley Heath
3. Redhill Aerodrome

The reason that seven locations are no longer considered reasonable options for the purposes of SA are set out in the table below.

Table 56: Garden Settlement Broad Locations deemed Unsuitable and Unavailable

Location	Location Source ⁹	Suitability Assessment ¹⁰	Availability Assessment	Other reasons:
Land west of Edenbridge	HELAA Submission	SUITABLE	UNAVAILABLE: Sevenoaks DC who would be integral to the delivery of this location, do not support it and have formally stated that they will not be pursuing this as an option in their Local Plan.	There was concern about the access to the sites through a rural road network.
Land at Alderstead and Tollsworth Farm, Chaldon	HELAA Submission	UNSUITABLE: Landscape impact.	AVAILABLE: Significant land parcel submitted by landowner. Land in single land ownership.	There was concern about the access to the sites through a rural road network.
North of Cophorne	SWOT	UNSUITABLE: Landscape impact.	PARTIALLY AVAILABLE: A number of large sites submitted by multiple landowners.	Reliance on a smaller settlement in a neighbouring district to provide services and facilities.
Hobbs Industrial Estate	SWOT	UNSUITABLE: Landscape impact.	UNAVAILABLE: Whilst the employment area was initially submitted by the land owner for consideration as a mixed use development. Recent discussions with land agents suggest it is being considered for employment purposes only. Surrounding land did not form part of the HELAA process.	
Horne	SWOT	UNSUITABLE: Landscape impact.	UNAVAILABLE: Land in the area has not been submitted as part of the HELAA process.	
Lambs Business Park	SWOT	UNSUITABLE: Landscape impact.	UNAVAILABLE: Whilst some land in this area has been submitted through the HELAA land is only available for employment expansion. Land to the east of the location is considered under the South Godstone broad location.	
Lingfield	SWOT	UNSUITABLE: Landscape impact.	PARTIALLY AVAILABLE: A number of land parcels were submitted through the HELAA process.	There is significant flood risk in this area and no evidence provided that it could be mitigated.

Source: HELAA

⁹ Information relating to the Council's SWOT process can be found in the Spatial Approaches Topic Paper of 2015, 2016 and 2017. These are published on the Council's website.

¹⁰ For more information relating to the landscape assessment, please see the Council's website.

Although all potential Garden Settlement locations have been subject to SA previously, the 2017 SA was on the basis of 2,000 homes. Therefore, the three locations that are still considered reasonable options are subject to a more detailed and rigorous and updated assessment as part of this Local Plan Regulation 19 SA.

5.13.2 South Godstone

Introduction

The South Godstone broad location is centrally located in the District.

The broad location is predominantly arable farming land with varied topography. It is made of a number of parcels of land, bounded by hedgerows and occasional tree belts.

The site has been submitted to the Council for consideration as a mixed use development, including residential dwellings (up to 5,000), community infrastructure and other associated infrastructure.

The area is located on the A22, which is a main arterial road that connects London with the Coast. In terms of its strategic benefit it has the opportunity to provide jobs and homes in a prosperous economic area which is on the edge of the Gatwick Diamond.

The South Godstone broad location straddles areas both north and south of the railway line and is attached to the Tier 3 rural settlement of South Godstone. The A22 (Eastbourne Road) bisects the location from north to south whilst the railway line provides a clear demarcation of promotional interest between land to the north and land to the south.

The area is in proximity to the key employment areas of Gatwick Airport, Crawley and Redhill each of which are within reasonable travelling distance. Access to these employment areas is cross country either via rural roads or via the A264 at Felbridge towards Crawley, or by travelling north on the A22 to Caterham, the A25 for Redhill and wider areas from junction 6 of the M25. Redhill can also be accessed via direct train from Godstone Station located within the existing settlement and connecting trains to London, Guildford and Croydon can also be accessed at Redhill. The broad location is in close proximity to Lambs Business Park on Tilburstow Hill Road just off the A22, which is a strategic employment site for the district. Its location within the district means that any development in this location would predominantly serve current and future residents in the first instance.

Table 57: SA of South Godstone Garden Community Option

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
South Godstone	Housing	Health	Cultural Heritage	Transport	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Site	++	-	-	+	--	+	+	?/++	-	-	0	0	-	-	-	-

Note: This is the SA of the site rather than the policy. The SA of the policy can be found subsequently at section 5.21.

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

- Scope for a comparatively larger development, with more housing (including affordable) provision to address local needs.
- Scope to provide a range of different types, tenures and sizes.

Objective 2: To facilitate the improved health and wellbeing of the whole population.

- No direct bus connection to the East Surrey Hospital, which is more than 8km away. However, the development could provide a bus service to the hospital.
- One bus route to connect social and leisure uses. The development could increase access to social and leisure uses through footpaths, cycle ways and bus routes.
- The area south of the railway line contains a network of public footpaths and bridleways providing would be residents with good access to the countryside and natural greenspaces.
- Just over 4.5km north east of the potential Garden Community location is the Freedom Leisure Centre, which offers the nearest sports and fitness facilities for residents. Although a sports facilities could be provided on site.
- Development would be of a scale to provide new GP and dental surgeries, and possibly leisure and indoor sports facilities.
- South Godstone does not currently have local access to a GP surgery. Discussions with the Clinical Commissioning Group have identified that the Pondtail Surgery in Godstone could be relocated and expanded to the Garden Community.

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

- Development would result in the permanent loss of established rural character.
- Of the existing buildings in the area, many are protected cultural assets.
- Lagham Manor is a medieval moated site which is a scheduled monument, and a Grade II* listed building, together with the associated Grade II listed Brew House. It includes the earthworks and enclosed area of a particularly large and strongly embanked moated site. Whilst the Manor is well screened by trees, it is centrally located near the train station so could be impacted by development with an impact on setting and views. This could be potentially mitigated if Lagham Manor were to be set within a large park /area of green infrastructure, or sufficient landscaping provided, centrally located to serve the new village.
- The PPG states *'In line with the National Planning Policy Framework, local authorities should set out their Local Plan a positive strategy for the conservation and enjoyment of the historic environment. Such as a strategy should recognise that conservation is not a passive exercise. In developing their strategy, local planning authorities should identify specific opportunities within their area for the conservation and enhancement of heritage assets. This could include, where appropriate, the delivery of development within their settings that will make a positive contribution to, or better reveal the significance of, the heritage asset'*. Therefore, further investigation within the AAP should investigate and identify specific opportunities to enhance the heritage asset, for example via its setting within green infrastructure, so as to make a positive contribution to, or better reveal the significance of, the heritage asset.
- The buildings, moat and historic connections with the surrounding land need to be factored into any development, as does the wider setting and the context of the Park Pale and the historic deer park. There are no Conservation Areas within this broad location but part of it is an Area of High Archaeological Potential. There are also a number of listed buildings within and surrounding the area as well as pockets of ancient woodland. The setting of these assets would need detailed consideration in any design and the extent of land necessary for development would need to be appropriate having regard to any heritage constraints.

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

- The broad location is centrally located in the District and is directly adjacent to the A22 which is the main highways access point to the existing settlement which segregates the current built form
- Godstone Station is located in South Godstone, with services between Tonbridge and Redhill. Whilst the direct service to London have been removed, discussions with Network Rail identify that improvements to this line and its service is possible with development in this broad location including the need for mobility impaired access, possibly longer platforms, a new ticket hall, parking improvements and potential reorientation of the station. Network Rail suggest that there is capacity on the Tonbridge to Redhill line. Discussions with Network Rail and other rail related parties will continue. Whilst the settlement is and will be split by the railway line, it was considered that a large scale urban extension in this area would

expand the settlement around the railway line and thereby potentially help to retain this service and ensure that new services and facilities could provide for the existing community and for new residents and employees.

- Improvements to the train station would be a requirement of a garden community development at this broad location and pedestrian and cycle links would also need to be provided.
- Godstone station is identified for high priority improvements in the Infrastructure Delivery Plan (IDP), including a Park & Ride facility/Transport interchange/mobility impaired access to both platforms, ticket hall, toilets and enhanced rail services.
- The 2018 Strategic Highway Assessment undertaken for the Local Plan by Surrey County Council effectively considered variations centred around possible locations and combinations of location for the garden settlement. It concluded that the impacts were comparable with much of the impacts occurring on already congested links and junctions of the A22. It further noted that impacts may occur some distance away from the development sites since Tandridge District, including the motorways, is subject to congestion and any increase in vehicle trips at a local level results in re-routing. Moreover, the analysis showed that the impacts of each of the scenarios are not sufficiently severe to eliminate any one scenario on highway impact grounds. It therefore considered that providing suitable mitigation can be identified, particularly in key locations along the A22 corridor, highway impacts should not be the determining factor when selecting between garden villages. A holistic approach is recommended, taking into account broader accessibility issues together with other environmental, social and economic factors. The evidence shows that highway impacts are not a determining factor and that a reasonable size Garden Village offers good opportunities to provide local services and reduce the need to travel, particularly if the new settlement can be located near or public transport links.
- Highways England junction capacity modelling, further supported by Minerva transport modelling on behalf of TDC, shows that improvements to junction 6 of the M25 will be necessary infrastructure to support delivery of this garden settlement. In this light further detailed feasibility work will be undertaken to specify the exact nature of junction improvements. However, Highways England has expressed confidence that any such improvements can be delivered by 2023.
- The IDP also identifies a potential spine road to alleviate traffic on the A22
- Existing bus services for South Godstone that traverse the A22 are relatively frequent in comparison to the wider rural services. However, connections to and from more rural areas are limited.
- Access to facilities and amenities, such as convenience stores and / or supermarkets, is limited for the villages in the central area of Tandridge. A garden community at this location would offer opportunities to address these access deficits.
- A larger settlement scale also has increased scope for provision of higher order services, health, leisure and community facilities.
- South Godstone is located very centrally in Tandridge and as such additional services, facilities, amenities and events provided here would also be well located to serve other areas of the District. There is potential for flagship services/event locations/ facilities to serve whole District.
- Road Access to Gatwick Airport, Crawley and Redhill employment areas is cross country either via rural roads or via the A264 at Felbridge towards Crawley, or by travelling north on the A22 to Caterham, the A25 for Redhill and wider areas from junction 6 of the M25. Redhill can also be accessed via direct train from Godstone Station located within the existing settlement and connecting trains to London, Gatwick, Guildford and Croydon can also be accessed at Redhill.
- Presence of a pre-existing centrally located settlement (South Godstone village) hinders scope to meet key TDC garden community design principles (e.g. 4,.6 and 10) related to delivering a new community hub/heart utilising innovative design and the latest technologies. Opportunities are greater on open areas south or north of the railway line in this respect.
- South Godstone has a primary school, but does not have currently have local access to a secondary school. The closest secondary school is in Oxted. However, Surrey County Council have confirmed that two primary schools and a secondary school should be provided as part of the development.
- Potential to create green corridor connections to the train station from surrounding residential areas.

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

- Almost all land in the South Godstone location is greenfield.

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

- In terms of its strategic benefit it has the opportunity to provide jobs and homes in a prosperous economic area which is on the edge of the Gatwick Diamond.
- The broad location is in close proximity to Lambs Business Park on Tilburstow Hill Road just off the A22, which is a strategic employment site for the district. Further along the A22 is another strategic employment sites; Hobbs Industrial Estate.

- Accords with two wider regional policy/initiative areas that are focused on growth and investment. The site is on the edge of the [Gatwick Diamond](#) which was set up in 2003, and the 'Wandle Valley Corridor' which was established in the London Plan 2016.
 - Godstone Train station, on the Redhill to Tonbridge Line, is an economic benefit with services connecting to employment opportunities elsewhere in London, Gatwick Airport and East Croydon; and more locally at Redhill, Tonbridge and Reigate. The typical off peak service is one train per hour in both directions. A slower indirect service connects to Ashford International with its European connections.
 - Scope for a comparatively larger development. Economies of scale suggest greater likelihood of attracting higher value on-site employment and service provision within larger settlements.
 - Proximity to station and increased accessibility to wider region, increases likelihood of higher value business sectors locating here.
 - No employment land is anticipated to be lost as a result of the development.
 - Junction 6 of the M25 is just 4km north of South Godstone and provides commuter access to areas in and around London.
 - Served by just one bus service (409) which connects north/south to local employment opportunities north and south including Caterham and East Grinstead. Although this is likely to be improved by the development.
 - Development straddling both sides of the A22 and with direct access point(s) to it may have a wider regional negative economic impact by increased journey times between London and the South Coast. Could be mitigated by focusing development on the larger east side, although housing delivery targets may necessitate both sides to some extent.
 - If the development is not carefully designed, the railway line may act as a barrier to the garden community.
 - Train station facilitates visits to social and leisure attractions as far as London, and has cycle parking available.
 - The Economic Needs Assessment 2017 identifies South Godstone the second strongest commercial location due to its rail links and proximity to the M25.
- Lambs Business Park is located to the West of South Godstone Village and is currently designated as a Strategic Employment Site in the Tandridge District Core Strategy (2008-2026). The retention of this site as a strategic employment site is supported through the Tandridge Economic Needs Assessment (2015 and 2017) and the willingness of the landowner of Lambs has shown commitment to the retention and expansion of the land for employment uses for the future. The Council's Economic Proposition also shows support for Lambs Business Park as an employment site that could become a data centre and technology park and including its current operations could provide local job opportunities. Further south of the A22 is the other strategic employment site from the Core Strategy; Hobbs Industrial Estate.
 - The potential garden settlement will be required to provide employment floorspace (B1-B8 uses) in addition to other forms of employment, some of which could be accommodated at Business Park.
 - The garden community would be required to provide a community hub, which is likely to include leisure and retail. As such, additional jobs will also be provided.
 - Further, construction of the garden community will also create a number of jobs.

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

- Large-scale new development theoretically brings with it the potential for new renewable and de-centralised energy generation. Opportunities for CHP and/or district heating could be investigated, particularly in relation to potential waste uses at Lambs Business Park.
- Located within the Gatwick Safeguarding Zone which places restrictions on large scale wind turbines and solar farms. South Godstone is also in an area considered not especially favourable for both water source heat pumps and open source heat pumps, although closed loop may be feasible.
- Due to its central location and access to existing services and facilities, it is likely to be slightly less car dependent than Blindley Heath, so likely to be less emissions *per capita*.
- In submissions at earlier plan stages, WT Lamb Holdings Ltd (LRM Planning Ltd) stated '*Work undertaken by Arup has demonstrated that there is a significant amount of waste arising within Surrey, which currently is either placed within landfill or taken out of County. The development of a large scale biomass waste gasification plant within the District will ensure that waste is not only handled in a more sustainable manner, but also will result in a production of a significant amount of green electricity (15MW); enough to power 21,000 homes. As indicated in the accompanying Development Framework Document for the site, the redevelopment of the Lambs Business Park and quarry provides a unique opportunity to develop a large scale biomass waste to energy gasification plant. It benefits from a railway siding that is within the ownership of WT Lamb Holdings Limited, which will be utilised to receive the pre-sorted and bundled RDF and wood waste. This will ensure that all deliveries necessary to fuel the biomass waste to energy gasification plant can be achieved via sustainable modes of transport.*'

- In addition, Lichfields stated in submissions to earlier stages '*Environmental performance and climate resilience is key to a low carbon development homes will be built to low carbon, energy efficient standards. Renewable energy technologies, such as solar power will be harnessed and sustainable energy system will be developed to serve the community. Sustainable sourcing of construction materials and techniques*'

Objective 9: To use natural resources prudently.

- It is not currently possible to manage waste close to where it arises, due to the nearest location of non-inert landfill (near Redhill) and the household waste recycling centres being relatively distant. A new waste plan is being prepared by Surrey County Council, hence the effects on waste collection are currently uncertain (SA Objectives 9 and 13). Surrey County Council are currently considering relocation of one of the housing waste recycling centre, which could be located closer to the South Godstone Garden Community.

Objective 10: To adapt to the changing climate.

- Loss of large areas of greenfield will result in a cost to the natural air filtering function of the existing green infrastructure as well as a natural carbon sink.
- Planning at settlement scale increases opportunities to incorporate sustainable design principles to increase energy efficiency.
- Climate change may increase the extent of Flood Zone 3a on all three of the watercourses in the study area, in particular in the south east of the area by Tandridge Lane. Although the development should incorporate flooding mitigation where possible.

Objective 11: To reduce flood risk.

- The broad location is primarily within Flood Zone 1 (low risk). Flood Zones 2 and 3 (medium and high risk) also occur within the broad location along Eastbourne Road with additional areas of flood risk to the east of Tandridge Lane. The broad location contains areas of surface water flooding, but there is no identified risk of groundwater flooding.
- Some areas of surface water flood risk.
- Lichfields stated in submissions to earlier stages '*sustainable drainage systems, using water meadows, streams and reedbed and water efficient building design will help deliver a sensitive and resource efficient development and water environment.*'

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

- The demand for water in the area is already considered to be under serious stress (SA Objective 12).
- South Godstone falls within the Lingfield wastewater catchment.
- As outlined in the Water Cycle Study, Lingfield WwTW has the capacity to accept planned growth up to AMP10 (2035-2040) in the scenario where South Godstone is the preferred Garden Community. However, the level of growth at the Garden Community site is likely to cause the flow consent to be exceeded between 2035 and 2040, and the total future demand from this site should be considered by Southern Water in their planning. A future upgrade at Lingfield WwTW may require an extension to the existing site, and the Water Cycle Study outlines that a policy may be needed to ensure land is safeguarded for this purpose.
- Gibbs Brook flows across the north east of the area towards the south east where it joins the River Eden just outside the area. Country Stream is present in the south east and joins the River Eden 1km further downstream than Gibbs Brook. An un-named ordinary watercourse flows through the south west corner of the study area and joins Ray Brook.

Objective 13: To reduce land contamination and safeguard soil quality and quantity.

- South Godstone has three areas of former landfill with associated potential contamination risks.
- The area has slowly permeable seasonally wet slightly acid but base-rich loamy and clayey soils with impeded drainage.
- South Godstone consists of Grade 3 agricultural land in the northern half of the area, with the majority of land to the south grade 3 agricultural apart from a swath of land to the south west of the area that is non-agricultural. It is not known at this stage whether the land is Grade 3a or Grade 3b. In accordance with the precautionary principle it is anticipated that the proposed development would result in a significant loss of the district's most versatile soils
- The broad location contains areas at varying of risk of contamination. Some parts of the broad location have moderate risk of contamination, which could be dealt with by condition. Parts of the broad location are at high risk of contamination and would require a risk assessment and site investigation. Other parts have an elevated risk for which a desk study and preliminary risk assessment would be needed.

Objective 14: To ensure air quality continues to improve and noise and light pollution are reduced.

- A22 location may negatively impact upon air quality for residents.
- Air quality is likely to diminish should development go ahead at this potential Garden Community location. This is primarily because of increased emissions due to expected high personal car usage, the temporary effects of construction and the loss of green space which currently acts as a natural air filter for the area.
- Supporting evidence suggests that air quality will be more adversely affected by the South Godstone option in comparison to the other two garden settlement options.
- Nonetheless the evidence recommends several measures to implement in order to benefit air quality, in particular enacting the proposals of the Surrey Air Alliance.
- The northern tip of the broad location would require an odour assessment as within 800m of Waste Water Treatment Works.

Objective 15: To protect and enhance landscape character.

- Development of this area would inevitably result in the loss of significant stretches of greenfield countryside in an area of rural character.
- The area is within Low Weald Farmland Landscape Character Area, for which key positive landscape attributes highlighted in the Character Assessment include 'unsettled, peaceful, gently undulating and open farmland landscape', 'network of rural lanes, mostly hedge lined' and 'attractive scattered settlements churchyards and mills', The landscape strategy for the low weald farmland is to conserve its peaceful, unsettled character, whilst promoting traditional management of woodlands and hedgerows including restoration of hedgerow trees.
- The existing South Godstone village is a relatively compact nucleated settlement which is located centrally within the area of search and surrounded by farmland.
- North west sections of the broad location are with in the Area of Great Landscape Value (AGLV).
- The Northern edge is just 500 metres from the Surrey Hills AONB candidate area. AONB case-law dictates that visual impacts when looking out from within the AONB is an issue (though views into the AONB from beyond its boundary are a less significant issue). Therefore, views of the broad location from the AONB candidate area will need to be considered. For this reason, the area south of the railway line are likely to be preferable compared to the area to the north.
- A substantial area of land is contained by the railway and high ground to the south of the existing community. This, together with the large block of woodland on its south facing slopes, could provide a substantial and robust landscape feature. The land to the north is open and exposed, and forms the setting to the community, as such it is considered sensitive. Development should incorporate mitigation through careful design including planting strategies. Land for open space could be accommodated in a variety of locations to enhance existing features, such as Park Pale to the north of the railway and to the southwest of Latham Manor. Key characteristics of the landscape should be maintained where possible.
- Within the Tandridge District Landscape and Visual Assessment, the area has been assessed as a location with medium potential to accommodate future development. Any development would need to be mindful of the sensitive landscape to the north and the ridge lines and woodlands to the south.

Objective 16: To conserve and enhance biodiversity.

- There are no SSSIs in South Godstone. North of South Godstone, the area lies within the outer extent of the Impact Risk Zone for Godstone Ponds SSSI, so Natural England will require to be consulted on road proposals. Land, including south of the train line lies at the outer edges of the Godstone Ponds and Blindley Heath SSSI Impact Risk Zones.
- There is one SNCI, Cloverhouse Meadows, within the broad location and is south of Lagham Manor and is an area of grassland close to a brook and to pockets of ancient woodland. There is also one potential SNCI, Bradford Wood, which is a large pocket of ancient woodland. Collectively this cluster of grasslands and woodlands is of high local value.
- The broad location includes a watercourse which has been broadened into a set of artificial ponds at Oakhurst Place and a wooded corridor.
- There are pockets of ancient woodland throughout this broad location which will require protection.
- In respect of protected species, there are few records arising from the desktop study, although there are records of great crested newts outside South Godstone and dormouse in the ancient woodlands and records of bat roosts in the built-up area of South Godstone.
- There is a Biodiversity Opportunity Area following the watercourse corridor. Development offers an opportunity to create a green infrastructure corridor and increase linkages between the meadows and ancient woodlands, particularly around Cloverhouse Meadows. Broadening and enhancing the ancient woodland corridor and increasing wildlife linkages could be achieved.
- Situated on the A22 pathway to the Ashdown Forest Special Area of Conservation, although slightly further from the Forest than Blindley Heath, so comparatively reduced possible impacts, although this is arguably offset by likely the larger scale of development at South Godstone. Although both recreational and air quality impacts have been addressed or mitigated within the HRA.
- Both South Godstone and Blindley Heath contain scattered pockets of ancient woodland and broad leaved woodland, with marginally more in South Godstone. However, it should be possible to incorporate this within a comprehensive green infrastructure network to deliver net biodiversity gains biodiversity in and around developments, in accordance with both garden community principles and NPPF objectives (paragraphs 109, 117 and 118). There are similar opportunities to connect to larger areas of woodland beyond the broad location boundary.
- From the supporting ecological appraisals, the area is regarded as Majority Ecologically Suitable. Most is of relatively low ecological value, but there are pockets of locally important and Ancient Woodland which impose constraints on access, and will require protection and buffering in the context of major new residential development.
- The Gatwick Safeguarding Zone also potentially places restrictions on green infrastructure that will encourage large flocks of birds.
- The ancient woodland corridor in the north west quadrant running north from the railway line as far as Hart's Lane imposes a constraint on east west road access and drainage infrastructure, including access from the existing settlement of South Godstone. However, this could be overcome if access can be taken from Old Tilburstow Hill Road and Hart's Lane.
- In the Garden Villages Consultation, Lichfields state that '*Development will protect existing woodland and other features and will enhance the natural environment, providing a comprehensive network of green infrastructure that links together new parkland, sport and recreation facilities, allotments for local food production, nature conservation areas and habitats within a strong landscape setting reflective of the Surrey countryside.*'

5.13.3 Blindley Heath

Introduction

The Blindley Heath broad location is centrally located in the District.

The area is located on the A22, which is a main arterial road that connects London with the Coast. In terms of its strategic benefit it has the opportunity to provide jobs and homes in a prosperous economic area which is on the edge of the Gatwick Diamond. There is limited employment provision within or on the edge of the existing settlement but the area is in proximity to the key employment areas of Gatwick Airport, Crawley and Redhill each of which are within reasonable travelling distance. Access to these employment areas is cross country either via rural roads or via the A264 at Felbridge towards Crawley, or by travelling north on the A22 to Caterham, the A25 for Redhill and wider areas from junction 6 of the M25. Redhill can also be accessed via direct train from nearby Godstone Station at South Godstone which residents can travel to via car or public transport. Its location within the district means that any development in this location would predominantly serve current and future residents in the first instance.

The option has been promoted for 3155 dwellings, a mixed use centre (including retail, office space and a GP practice), a through school, a primary school, playing fields and 103ha of green infrastructure.

Table 58: SA of Blindley Heath Garden Community Option

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Blindley Heath	Housing	Health	Cultural Heritage	Transport	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Site	++	-	-	-	..	-	-	?	-	-	-	-	-	0/-	-	-

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

- Likely smaller scale of development compared to South Godstone and Redhill Aerodrome, with reduced scope to address housing needs/requirements or provide higher order services, facilities and infrastructure.
- Less opportunity to provide a wider range of housing products and less affordable housing.

Objective 2: To facilitate the improved health and wellbeing of the whole population.

- Emergency services at East Surrey Hospital, which is 7km north west of the potential Garden Village location at its nearest point, and East Grinstead Hospital which is about 8km south. Bus connections are currently either indirect or necessitate walking part of the journey.
- Current access to leisure centres and sports facilities are limited. The closest facilities are several kilometres away for the majority of prospective residents. The proposed garden community may not be of sufficient scale to support its own viable leisure and indoor sports facilities.

- Development would be of a sufficient scale to provide new GP and dental surgeries. Discussions with Clinical Commissioning Group have indicated that a GP surgery could relocate and expand at Blindley Heath although if it was Pondtail this is quite a considerable distance from its existing position.
- The potential Garden Community location is traversed by a network of footpaths and bridleways, providing residents with good access into the countryside.
- A large village green is adjacent to the east of the potential Garden Community location.
- New open space will be required to offset losses and to serve the new community and facilitate good health and wellbeing of residents (SA Objective2).

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

- Development would result in the permanent loss of established rural character.
- There are no Conservation Areas within this broad location.
- Part of the location is an Area of High Archaeological Potential.
- There are areas of Ancient Woodland to the north west, and to the south.
- There is a grade II* listed building adjacent to the south west boundary of the site, as well as a number of other listed buildings around the broad location.
- The village of Blindley Heath contains four Grade II Listed Buildings.
- The settings of these heritage assets may potentially be diminished by development and layout would require sensitive consideration in this light.

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

- Located on the A22, which is a main arterial road that connects London with the Coast.
- Existing bus services for Blindley Heath that traverse the A22 are relatively frequent in comparison to the wider rural services. However, connections to and from more rural areas are limited. On two bus routes (South Godstone has only one) to connect to a wider range of social and leisure uses, although the connecting junction of the two routes is off-centre and on the northern edge of the broad location.
- There is no train station located at Blindley Heath. The closest rail connection is via Godstone Station at South Godstone, or Lingfield. The promoters of the land within the broad location have identified that frequent bus services would be subsidised initially and provided as part of the development with a potential 'pocket park and ride' bus service to other rail stations. Network rail do not identify capacity issues on the Tonbridge to Redhill line which is relevant to Godstone Station. Although this is still likely to result in an increase in car travel, which will also impact on car parking in these existing settlements.
- The 2018 Strategic Highway Assessment undertaken for the Local Plan by Surrey County Council effectively considered variations centred around possible locations and combinations of location for the garden settlement. It concluded that the impacts were comparable with much of the impacts occurring on already congested links and junctions of the A22. It further noted that impacts may occur some distance away from the development sites since Tandridge District, including the motorways, is subject to congestion and any increase in vehicle trips at a local level results in re-routing. Moreover, the analysis showed that the impacts of each of the scenarios are not sufficiently severe to eliminate any one scenario on highway impact grounds. It therefore considered that providing suitable mitigation can be identified, particularly in key locations along the A22 corridor, highway impacts should not be the determining factor when selecting between garden villages. A holistic approach is recommended, taking into account broader accessibility issues together with other environmental, social and economic factors. The evidence shows that highway impacts are not a determining factor and that a reasonable size Garden Village offers good opportunities to provide local services and reduce the need to travel, particularly if the new settlement can be located near or adjacent public transport links.
- Not quite as centrally located within the District as South Godstone, so scope for new facilities or amenities to serve District-wide residents is slightly reduced in comparison.
- Very small scale of pre-existing host settlement (Blindley Heath) means there is opportunity to meet key TDC garden village principles (e.g. 4, 6 and 10) related to delivering a new community hub/heart utilising innovative design and the latest technologies.
- Surrey County Council have indicated that new primary schools and a secondary school would need to be provided on site.
- Secondary schools are located towards the periphery of the district. Consequently those sites in more central locations in the district, such as Blindley Heath, have journey distances of over 6km to the closest secondary school. All settlements included within the assessment have local access to primary schools, with the exception of Blindley Heath. A garden community at this location would offer opportunities to address these access deficits
- Access to facilities and amenities, such as convenience stores and / or supermarkets, is limited for the villages in the central area of Tandridge. A garden community at this location would offer opportunities to address these access deficits.

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

- Development would result in significant loss of greenfield land, largely agricultural.

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

- Accords with two wider regional policy/initiative areas that are focused on growth and Investment. The site is on the edge of the [Gatwick Diamond](#), which was set up in 2003; and the 'Wandle Valley Corridor' was established London Plan 2016.
- In fairly reasonable distance to two strategic employment sites; Hobbs Industrial Estate and Lambs Business Park.
- New development may lack either the critical mass or sufficient transport connections to attract higher value businesses and industries.
- Access to the M23 and M25 are both approximately 7km away.
- No on-site train station for connections to London or Gatwick.
- Two Bus services (315 and 409) connect north, south, east and west to local employment opportunities at Redhill, Caterham, East Grinstead and East Surrey Hospital.
- Development here would see the likely loss of a campsite with its associated tourism benefits. An equestrian centre is also present within the potential Garden Community, which may also be impacted if development were to proceed here
- Development straddling both sides of the A22 and with direct access point(s) to it may have a wider regional negative economic impact by increased journey times between London and the South Coast. Could be mitigated by focusing development on the larger west side.
- The Economic Needs Assessment 2017 ranks Blindley Heath as the poorest commercial location based on its proximity to rail and strategic road network in comparison to the other garden village broad locations.
- Systems House is located in Blindley Heath (off the A22) and is a 1.2 ha employment site that the Tandridge Economic Needs Assessment (2015 and 2017) recommends should continue to be protected for B1 uses.
- The garden settlement will be required to provide employment floorspace (B1-B8 uses) in addition to other forms of employment.
- The garden village will be required to provide a community hub, which is likely to include leisure and retail. As such, additional jobs will also be provided.
- Further, construction of the garden community will also create a number of jobs.

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

- Due to its location and reliance on rail services provided by other settlements, the garden community at this location is likely to be heavily car dependent with high levels of associated emissions *per capita*.
- Large-scale new development theoretically brings with it the potential for new renewable and de-centralised energy generation. Opportunities for CHP and/or district heating could be investigated.
- However, location is within the Gatwick Safeguarding Zone which may place restrictions on large scale wind turbines and solar farms. Also within an area considered not especially favourable for both water source heat pumps and open source heat pumps, although closed loop may be feasible.

Objective 9: To use natural resources prudently.

- Neither Blindley Heath nor South Godstone allows waste to be managed close to where it arises, due to the nearest location of non-inert landfill (near Redhill) and the household waste recycling centres being relatively distant. A new waste plan is being prepared by Surrey County Council, hence the effects on waste collection are currently uncertain (SA Objectives 9 and 13).

Objective 10: To adapt to the changing climate.

- Loss of large areas of greenfield will result in a cost to the natural air filtering function of the existing green infrastructure as well as a natural carbon sink (SA Objective 8).
- Planning at settlement scale increases opportunities to incorporate sustainable design principles to increase energy efficiency.
- Larger areas at risk of flooding, so vulnerable to long term negative effects of climate change.

Objective 11: To reduce flood risk.

- The Ray Brook, a tributary of the River Eden, runs in a broadly easterly direction across the potential broad location, before meeting the Eden Brook. Due to the presence of watercourses, some land within the broad location, is within flood zones 2 and 3 (medium and high risk). However, the potential broad location is predominantly within flood zone 1 (low risk).
- Blindley Heath also slightly more extensive areas of surface water flooding than in South Godstone. Development at this location may diminish ecosystem services provided, such as mitigation of flood risk.
- The SFRA notes that climate change is likely to increase the extent of Flood Zone 3a in the south east of the area.

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

- The Blindley Heath broad location abuts the River Eden (Main River) both north and south. This would need careful planning of SuDS and GI to avoid run-off and impacts upon water quality. Conversely it also provides opportunities for enhanced green infrastructure, and agricultural related water pollution could be reduced.
- It has been identified that the water table of the SSSI in this broad location could be adversely affected, impacting the flora and fauna.
- Further, the demand for water in the area is already considered to be under serious stress
- There is a sewerage treatment works located on Crowhurst Lane in Lingfield approximately 2,500 meters to the south east of central Blindley Heath. In relation to a garden village option, Thames Water recommends that a mini Integrated Water Management Strategy (IWMS) is produced to support the development promotion and this should be specifically referred to in a policy. Southern Water have identified that it is likely that investment will be required to provide additional capacity in this location, both in strategic infrastructure such as wastewater treatment works (WwTWs) and local infrastructure such as the sewerage system, (i.e. the system of pipes and pumping stations that convey wastewater from homes to the WTW for treatment) It has been confirmed that Lingfield WwTW has the capacity to accept planned growth up to AMP10 (2035-2040). Although delivery of the network reinforcement will be required and need to be aligned with the occupation of development.

Objective 13: To reduce land contamination and safeguard soil quality and quantity.

- The broad location contains an area of land that has moderate risk of land contamination, but could be dealt with by condition.
- In terms of noise pollution, an acoustic report would be needed for dwellings within 10m of the A22.
- There are a number of historic landfill sites within and adjacent to the broad location, including a limited waste disposal and historic landfill site to east.
- The area has slowly permeable seasonally wet slightly acid but base-rich loamy and clayey soils with impeded drainage.
- Blindley Heath comprises approximately 80% grade 3 and 20% grade 4. It is not known at this stage whether the land is Grade 3a or Grade 3b. In accordance with the precautionary principle it is anticipated that the proposed development would result in a significant loss of the district's most versatile soils.

Objective 14: To ensure air quality continues to improve and noise and light pollution are reduced.

- A22 location may negatively impact upon air quality for residents of the garden community.
- Air quality is likely to diminish should development go ahead at this potential Garden community location. This is primarily because of increased emissions due to expected high personal car usage, the temporary effects of construction and the loss of green space which currently acts as a natural air filter for the area. Supporting evidence suggests that air quality will be more adversely affected by the South Godstone option in comparison to the other two garden settlement options, including Blindley Heath.
- Nonetheless the evidence recommends several measures to implement in order to benefit air quality, in particular enacting the proposals of the Surrey Air Alliance.

Objective 15: To protect and enhance landscape character.

- Development of this area would inevitably result in the loss of significant stretches of relatively remote greenfield countryside in an area of very rural character.
- The area falls within the Low Weald Farmland Character Area. For which the Surrey Landscape Character Assessment highlights key positive landscape attributes including 'unsettled, peaceful, gently undulating and open farmland landscape', 'network of rural lanes, mostly hedge lined' and 'attractive scattered settlements churchyards and mills'. The landscape strategy for the low weald farmland is to conserve its peaceful, unsettled character, whilst promoting traditional management of woodlands and hedgerows including restoration of hedgerow trees.
- Small hamlets and scattered farmsteads, set along a network of rural lanes are characteristic of the Blindley Heath landscape which is also characterised by a central block of medium to large scale mixed agricultural farmland, with a largely intact hedgerow network and a semi-open outlook.
- The area to the west of Blindley Heath has been assessed as a location with a high potential to accommodate future large scale development within the 'Tandridge District Landscape and Visual Assessment for a Potential Garden Village Location'. It suggests that settlement expansion could be accommodated within the well-defined landscape parameters where the existing landscape structure could be developed to define new robust boundaries to the area of new settlement. The wider rural setting to Blindley Heath would largely be unaffected by the potential development and there should not be the potential for coalescence with any surrounding settlements. The landscape assessment undertaken by the Council did not look in detail at land to the east of the settlement although if further development were proposed between the A22 and Tandridge Lane could provide additional capacity without undue visual impact on the wider landscape to the east of Blindley Heath.
- The high ground to the north and north-west, together with the substantial blocks of woodland on the south facing slopes, provide a substantial and robust landscape feature. The land form also provides physical and visual separation to Anglefield Corner. There are no landscape designations such as AONB within the broader area. It is contained in the wider landscape by high ground to the north and woodland and an established hedgerow network to the west and south. The relatively intact internal landscape structure to the central area could form a basis for the structuring of land parcels for residential and open space land uses. Further expansion in the longer term would be inappropriate in the surrounding landscape to the west and south due to flood plain limitations and the scale and sensitivity of the local landscape. Land to the north is elevated and exposed and not appropriate for development in the context of the settlement pattern of Blindley Heath and its wider setting. Limited expansion to the east, beyond the A22 and as far east as Tandridge Lane could be accommodated without undue visual impact on the wider landscape.

Objective 16: To conserve and enhance biodiversity.

- Blindley Heath already abuts a Local Nature Reserve (LNR) – Blindley Heath, run by Surrey Wildlife Trust and one of the best known examples of relict damp grassland on Weald clay in Surrey. This is also designated common land and SSSI. The potential Garden Community would be located within impact zones of Blindley Heath SSSI. The SSSI is already in unfavourable condition, though recovering. It requires clearance and restoration works. Whilst it may serve as a green infrastructure resource for local people, there is a risk of nearby development and increased visitor numbers negatively affecting the condition of the designation. The Water Cycle Study also identified potential run off from the development onto the SSSI, which could adversely impact it.
- The majority of the potential broad location consists of arable and pasture grasslands, separated by a strong network of hedges, linked to ancient woodlands, notably Blue Anchor Wood SNCI, Byers Wood potential SNCI and, further north, Hangdog Wood potential SNCI. These woodland and hedgerow interests would require creation of buffer zones and sensitive residential design to maximise retention of hedgerows and replacement of their network value (in areas where loss is inevitable).
- There are few records of protected species within this potential location, but great crested newts are recorded in the wider landscape, and bat roost records exist for the built-up areas of Blindley Heath. There is a possibility that dormice are present in the areas of ancient woodland.
- The location on the A22, which connects through to the Ashdown Forest, means air pollution effects on the Special Area of Conservation, as well as recreational impacts are a consideration. Although both matters have been addressed or mitigated within the HRA.
- Southern flood areas are also within Eden Biodiversity Opportunity Areas (Floodplain Grazing Marsh, Lowland Meadows, Wet Woodland). Development on the BOA itself would represent a missed opportunity to secure net gains in biodiversity. Conversely, adjacent development of this broad location may actually facilitate potential opportunities for green/blue

infrastructure and wetland habitat creation. Green/blue infrastructure provision may impact upon the developable area and has a risk of conflict with objectives of Gatwick Safeguarding zone by encouraging flocks of wetland birds. The BOA is also connected to Blindley Heath SSSI and Local Nature Reserve (LNR) and new passive recreational opportunities may reduce pressure on the SSSI and LNR by minimising the need/desire to access them.

- Whilst flood risk is a significant planning consideration, the existence of a watercourse within a potential development area provides considerable opportunities for landscape features, habitats and biodiversity. It also provides a potential recreational feature in terms of leisure and physical activity
- Blindley heath has a handful of wooded areas and opportunities to incorporate biodiversity in and around developments, as well as habitat connectivity should be sought in line with NPPF paragraphs 109, 117 and 118.
- The east section is the more habitat rich area and also contains records of Great Crested Newt (European Protected Species) and a traditional orchard that should be protected.
- The area is considered to be Majority Ecologically Suitable for development, but in areas around retained woodlands and in the more closely-networked hedgerows, sensitive design of roads and residential parcels would be required. The Ray Brook corridor and floodplain is undevelopable, but as it is currently of rather low ecological interest, a large-scale holistically-planned development offers the opportunity to restore natural environmental interests.

5.13.4 Redhill Aerodrome

Introduction

The Redhill Aerodrome broad location is located on the western edge of the district near South Nutfield. The broad location crosses administrative borders into Reigate and Banstead Borough Council (RBBC), with roughly equal areas in the two local authority boundaries. The current land use is an operational aerodrome and surrounding agricultural farmland.

The surrounding areas vary, being open to the south and east and sparse development to the north and west. There are a number of settlements that are in close proximity to the broad location, most prominently South Nutfield in Tandridge District and Whitebushes and Salfords in Reigate and Banstead Borough.

The broad location contains the currently functioning Redhill Aerodrome. A number of agricultural fields also exist within the boundary. The M23 largely forms the eastern border, with existing development in Reigate and Banstead forming the western border. Salfords Stream runs east to west through the southern part of the broad location. The location itself is relatively flat, although largely sits within a bowl shape with the surrounding landscape having views down into it. There is currently no strategic road access to the location, with a reliance on the rural road network. The closest strategic road is the A25 and A23, whilst the M23 runs to the west of the broad location, there is no access from it.

Whilst there is existing sporadic residential development across the area, the main built form is concentrated to the employment units which are mainly aviation related and the rest of land in the broad location is undeveloped and rural in nature.

The option has been promoted for 6,000 to 8,000 dwellings, c8.5ha of employment land, 1 new secondary school and 3 new primary schools, and new open spaces.

There have been a number of recent planning applications in relation to the existing commercial uses. Of note, 2012/1027 was an application for the construction of a hard runway to replace the existing grass runway. This application was considered through appeal and by the High Court and dismissed as not justifying the very special circumstances necessary to build within the Green Belt.

Table 59: SA of Redhill Aerodrome Garden Community Option

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Redhill Aerodrome	Housing	Health	Cultural Heritage	Transport	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Site	++	+	-	S/T L/T	- ?/++	0	-	-	?	-	-	-	-	0/-	-	-

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

- Will provide a significant quantity of housing, including affordable, though much of it neighbouring Reigate & Banstead Borough. Even allowing for the split across two authorities, the number in the Tandridge section still compares favourably to the other TDC garden settlement options.

Objective 2: To facilitate the improved health and wellbeing of the whole population.

- East Surrey Hospital sits on the far western edge of the broad location within Reigate and Banstead Borough where the A23 also runs.
- Development at this broad location has the benefit to facilitate improvements to East Surrey Hospital and provide key worker properties for medical personnel but would mean that existing aviation associated businesses would be lost, although employment provision would be re-provided as part of development.

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

- There are no Conservation Areas or Areas of High Archaeological Potential within this broad location which includes the former WW2 airfield. However, there are a number of listed buildings within and surrounding the area including at Hamme House, South Hale Farm and Crab Hill Farm. There are also some pockets of ancient woodland. The setting of these assets would need detailed consideration in any design and the extent of land necessary for development would need to be appropriate having regard to any heritage constraints.

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

- Redhill Aerodrome broad location it is not directly adjacent to any other settlement and currently only accessible via a rural road network. It is, however, in close proximity to Redhill, Earlswood and South Nutfield settlements. Each of these settlements have some level of service provision including schools, health facilities, retail and leisure, employment and recreational opportunities, although many are at or near capacity and South Nutfield has minimal services and residents have to travel out of settlement for higher scale facilities. A development of approximately 8,000 units would need provide new services and facilities or upscale those existing to offset the impact of development. Any development of this size needs to provide new schools for all ages, new health facilities, new employment, retail and leisure facilities and recreational uses. Improvements to the road network and public transport would be required and a new junction from the M23 and strategic link road would be necessary. In the strategic sense, this broad location could provide facilities, homes, jobs and services to a wider area. There are four rail stations within 3.5km of the broad location including Nutfield (Redhill to Tonbridge line), Earlswood, Salfords and Redhill (London to Brighton line). However, none of the four are physically located within the broad location and would need to be accessed via car or public transport. Nutfield station, north of the broad location will shortly have its direct London service removed, but discussions with Network Rail identify that improvements to this line and its service is possible with development at this broad location including the need for mobility impaired access, possibly longer platforms and a new ticket hall. Network rail suggest that there is capacity on the Tonbridge to Redhill line. Discussions with Network Rail and other rail related parties are ongoing.
- The 2018 Strategic Highway Assessment undertaken for the Local Plan by Surrey County Council effectively considered variations centred around possible locations and combinations of location for the garden settlement. For Redhill Aerodrome it assumed the delivery of the proposed M23 junction. On this basis, it noted that despite being such a large development, Redhill Aerodrome garden village traffic flows would have a limited impact on the Tandridge road network as they largely route via the strategic road network or use roads to the west of the development to and from Redhill,
- Overall the 2018 Strategic Highway Assessment concluded that the impacts were between garden village locations were comparable and considered that providing suitable mitigation can be identified, particularly in key locations along the A22 corridor, highway impacts should not be the determining factor when selecting between garden villages. A holistic approach was recommended, taking into account broader accessibility issues together with other environmental, social and economic factors. The evidence shows that highway impacts are not a determining factor and that a reasonable size Garden Village offers good opportunities to provide local services and reduce the need to travel, particularly if the new settlement can be located near or adjacent public transport links.
- Existing bus services are primarily located on the Redhill side of this broad location where there are frequent services along A23 into Redhill to the north and to Gatwick to the south, connections and frequency of buses within Tandridge District are much more limited. The promoters of the land at this broad location have identified that frequent bus services will be subsidised initially and will be provided as part of the development increasing access to key employment areas in Crawley, Redhill and Gatwick as well as train stations. It is not clear however, what benefits this would bring for Tandridge residents as improvements are likely to be focused toward western locations. Pedestrian and cycle links would also be provided. The area is located west of the M23 which is a major strategic road network and runs between London and Brighton via Gatwick Airport. However, there is no direct access to the M23 or any other strategic roads such as the A23 to the west or A25 to the north. Current access to the area is reliant on a rural road network and there is no current direct access to Strategic Road Network with the A23 located to the west and A25 to the north but only accessed via rural feeder roads. Access to the land is reliant on a new junction and link road off the M23, but to date, no certainty of delivery of the junction has been demonstrated. Officers of TDC and RBBC, as well as the developer and promoter for the land within the broad location, agree that a new junction off the M23 and link road would be needed if a garden community development were to be possible. Discussions with the Department for Transport and Highways England have not resulted in any assurance that a new junction is

programmed to take place. Neither is there reference to a new junction for the M23 included within the emerging Road Improvements Strategy (RIS2) which sets out strategic road improvement priorities up to 2025. As such, the prospect of a new junction and the timescales for delivery remain uncertain.

- An All Party Parliament Group on Aviation is considering the need to resist loss of light aircraft aerodromes which could be relevant to the consideration of Redhill Aerodrome. However, this is in early stages but initial indications show that Redhill Aerodrome should be protected.

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

- Planning Minister Brandon Lewis defined airfields as brownfield in 2015. See link <https://brownfieldbriefing.com/43456/airfield-grassland-is-brownfield>. However, the 2014 High Court and Planning Appeal determine that the site is greenfield. As the Planning Inspector has considered the specifics of this site, the Council are concluding the site is greenfield and the majority of the land in this area is also greenfield.

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

- This location is well located in the Gatwick Diamond and key employment areas of Gatwick, Crawley and more closely Redhill and Reigate are in easy commuting distance and the Coast to Capital Local Enterprise Partnership has shown support for development in this location as a way to encourage further economic prosperity.
- Development in this location accords with wider regional policy/initiative areas that are focused on growth and Investment. The [Gatwick Diamond](#) was set up in 2003, the 'Wandle Valley Corridor' which was established London Plan 2016, and the M23 Strategic Corridor.
- As a result of its proximity to the A23, Redhill, Gatwick and Crawley, this broad location strongly serves economic objectives and whilst there is no train station directly within the broad location, there are four in the surrounding areas providing access to London and Brighton.
- Less well related to Local Plan Strategic Employment sites in comparison to South Godstone and Blindley Heath.
- The Tandridge Economic Needs Assessment (ENA) (2017) identifies that 6.68ha of Redhill Aerodrome forms an employment cluster that contains employment units (in good to very good condition) that predominately consist of a mix of warehousing, industrial and office uses which are primarily aviation related, but there are other businesses also. Approximately 0.5ha of the site had the potential for intensification at the time of the survey. If these employment uses were lost as a result of development they could be relocated and replaced within the wider garden community and additional employment provided, albeit it would stand to reason that the loss of the airfield would mean that the current aviation related businesses would also be lost. A garden village at Redhill Aerodrome was considered to be the best option from a commercial perspective due to its strategic location on the A23 and M23, and close proximity to Gatwick Airport. A garden settlement would be required to provide a community hub, which would likely include leisure and retail. As such, additional jobs will also be provided and would not necessarily lose the existing employment space in that location, although it could be moved to a different area of the wider development. Finally, its proximity to East Surrey Hospital would make it attractive for key worker housing for medical professionals, although this might mean that existing aviation associated businesses would be lost, although employment provision would be re-provided as part of development. Construction jobs would also support the local economy.

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

- Scope to apply renewable / low carbon energy opportunities unclear, although the convenience of proposed future access to the motorway network mean this would likely be a car-reliant settlement with associated emissions.

Objective 9: To use natural resources prudently.

- More scope to allow waste to be managed close to where it arises, due to the proximity location of non-inert landfill (near Redhill) and the household waste recycling centre. A new waste plan is being prepared by Surrey County Council, hence the effects on waste collection are currently uncertain (SA Objectives 9 and 13).

Objective 10: To adapt to the changing climate.

- Loss of large areas of grassed area will result in a cost to the natural air filtering function of the existing green infrastructure as well as a natural carbon sink (SA Objective 8).
- Planning at settlement scale increases opportunities to incorporate sustainable design principles to increase energy efficiency.
- Larger areas at risk of flooding in comparison to South Godstone, so comparatively more vulnerable to long term negative effects of climate change.
- The SFRA notes that 'Climate change is unlikely to significantly change the Flood Zone classification within the area'

Objective 11: To reduce flood risk.

- The western part of Tandridge District and this broad location lies within the Upper Mole catchment. The Salfords Stream and associated tributaries, including the Redhill Brook, flow generally in a westerly and northerly direction towards the River Mole. Due to the presence of watercourses, some areas of the broad location, particularly on the land within Tandridge, are within flood zones 2 and 3 (medium and high risk). However, when considering the wider remit of the broad location it is predominantly within flood zone 1 (low risk). There are a number of areas at high risk of surface water flooding throughout the broad location, with the main area of land at risk to the east, within the TDC boundary.
- The presence of land at medium to high risk of flooding is mostly due to a culvert built to take Redhill Brook underneath the runway currently utilised by the aerodrome. At a time of prolonged heavy rain, the culvert does not have capacity to deal with the brook's flow, causing shallow flooding at either end of the culvert and has a knock on effect. A garden village development at this broad location could enable flood mitigation in this respect and restore the open watercourse, and enhance storm water storage areas to manage heavy water flows and reduce the areas prone to flooding within and outside of the area. Development proposals would need to include Sustainable Urban Drainage systems.

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

- There are two wastewater treatment works within proximity of the broad location, one in the Earlswood/Whitebushes area, another adjacent to the M23 on Crab Hill Lane near South Nutfield.
- Thames Water commented in relation to Redhill Aerodrome as follows: *"Earlswood (Reigate) STW is currently close to its permit and a planned upgrade is to be delivered by March 2021. Much of the growth in this catchment is from outside Tandridge and is likely to be accommodated through the planned capacity upgrade. Thames Water have concerns should Redhill Aerodrome garden community site be adopted as additional upgrades will be required, would be likely to cost tens of millions of pounds and take 3 to 5 five years to plan and deliver. Phasing of future enhancements to our works will be planned in consultation with all key stakeholders to ensure capacity is delivered in a timely manner beyond the design horizon of our current upgrades."*
- The Redhill Aerodrome site drains west via Redhill Brook, Salfords Stream and Earlswood Brook to the River Mole.
- SuDS stages benefitting water treatment would be necessary at this location for reasons set out in the Habitats Regulations Assessment 'Appropriate Assessment'.

Objective 13: To reduce land contamination and safeguard soil quality and quantity.

- The broad location contains areas of both high risk of contamination and elevated risk of contamination. The areas at high risk would require a risk assessment and site investigation. The area at elevated risk would require a desk based study and a preliminary risk assessment.
- Nutfield Parish Council have highlighted the Aerodrome's previous military use, noting that from 1937 onwards it was used by the RAF initially for training, then from 1940 onwards as an operational base from which a large number of squadrons, flying predominantly a variety of fighter aircraft were based. Towards the end of hostilities it became the largest bomb storage ground in the south east before returning to civilian use from 1947 until the present.
- An acoustic survey for this site concluded this is not an overriding constraint to development..
- The area has slowly permeable seasonally wet slightly acid but base-rich loamy and clayey soils with impeded drainage.
- The broad location is mostly formed of grade 4 agricultural land – although not in agricultural use, with areas to the east containing land of grade 3 agricultural value.

Objective 14: To ensure air quality continues to improve and noise and light pollution are reduced.

- Air quality is likely to diminish should development go ahead at either potential Garden Community location. This is primarily because of increased emissions due to expected high personal car usage, the temporary effects of construction and the loss of green space which currently acts as a natural air filter for the area. Supporting evidence suggests that air quality will be more adversely affected by the South Godstone option in comparison to the other two garden settlement options, including Redhill Aerodrome.
- Nonetheless the evidence recommends several measures to implement in order to benefit air quality, in particular enacting the proposals of the Surrey Air Alliance.
- The western edge of the broad location (outside District) would require an odour assessment as within 800m of Waste Water Treatment Works.

Objective 15: To protect and enhance landscape character.

- The area falls within the Low Weald Farmland Character Area. for which the Surrey Landscape Character Assessment highlights key positive landscape attributes including 'unsettled, peaceful, gently undulating and open farmland landscape', 'network of rural lanes, mostly hedge lined' and 'attractive scattered settlements churchyards and mills', The landscape strategy for the low weald farmland is to conserve its peaceful, unsettled character, whilst promoting traditional management of woodlands and hedgerows including restoration of hedgerow trees.
- Redhill Aerodrome, which lies at the core of the broad location, is maintained as open grassland and utilises a grass-runway; it has no landscape designations and few landscape features of high landscape value. It lacks internal landscape structure but is locally well-contained by a minor ridge to the west and north-west which separates the airfield from the urban areas of Redhill further to the west. A mature framework of hedgerows, tree lines and the M23 corridor provide wider containment to the east and south. More locally the riparian vegetation of the Redhill Brook and Salford's Stream floodplains add containment to the area, although the eastern and western airfield boundaries adjacent to the runway alignments are limited and offer open views across the aerodrome and beyond, from adjacent roads. Development here could affect the rural setting of neighbouring settlements, particularly South Nutfield. There is indivisibility between land adjoining South Nutfield and the aerodrome. A high degree of rural/urban interface also exists between the edge of Redhill, Whitebushes and Earlswood, compounded by proximity to the transport corridors of the railway and motorway. These characteristics essentially interrupt the landscape characteristics and result in a low sensitivity to change, although the level of sensitivity rises around the managed wildlife sites. There is potential for impacts on the setting of the candidate AONB to the north and to views from the Greensand Way, as well as limitations associated with the flood plain and the M23 to the east which would need to be recognised in design.
- The boundary of the AGLV along the railway line to the north is fairly close but its setting is not protected by Government planning policy In the same as an AONB.
- Within the Tandridge Landscape and Visual Assessment, the area has been assessed as a location with medium potential to accommodate future development. New development would be prominent from the north, particularly from the Greensand Ridge and the candidate area for the AONB and the Greensand Way, but is otherwise well-contained in the wider landscape.

Objective 16: To conserve and enhance biodiversity.

- The site is within 7km of a protected international site – the 'Mole Gap to Reigate Escarpment' Special Area of Conservation, although the HRA has demonstrated how all impacts can be screened out, avoided or mitigated, including by other policies in the Local Plan. SuDS stages benefitting water treatment would be necessary at this location for reasons set out in the HRA.
- There are no SSSI's within the broad location on the Tandridge side, yet the northern half of the potential location lies within the outer radius of the SSSI Impact Risk Zone for Mole Gap to Reigate Escarpment SSSI, and Natural England would require consultation on major new housing and infrastructure schemes. It is anticipated that their primary concern would be the indirect effects of recreational disturbance on the SSSI.
- There is one SNCI within the potential location, Furzefield Wood to the south of the broad location, with Outwood Common SNCI being near the broad location to the south west. Thepps Shaw potential SNCI is to the north east of the site on Kings Cross Lane and a further two potential SNCIs are to the south west of the broad location.
- Furzefield Wood is also an area of Ancient Woodland to the south of the broad location. Other areas of Ancient Woodland are scattered in the Reigate and Banstead portion of broad location and in the close vicinity. There is a woodland TPO on this site, and area TPO and a high number of individual TPOs. The site is not within the AONB although the area of candidate AONB is to the north of the site
- Whilst the aerodrome grassland and the arable land is sub-optimal habitat for amphibians due to the lack of wetlands and the intensive management regimes, the semi-improved pasture and hedges will provide shelter and foraging habitat. There are also several records of great crested newts within and around the area.
- The potential location offers two principal opportunities for ecological enhancement. 1) It is identified as a Biodiversity Opportunity Area and it could become a broad green infrastructure corridor with a diversity of new habitats, including re-naturalisation of the floodplain. This would also give opportunities for public recreation in close contact with the natural environment. 2) The cessation of aerodrome activity would enable more opportunities for woodland planting and pond creation within the framework of a garden community. New woodland and wetlands created within a garden community framework would enhance the populations of amphibians (including Great Crested Newts) and birds.
- In supporting evidence the site is considered to be 'Ecologically Suitable' for development and of relatively low ecological interest. However, the garden settlement area of search subsequently widened to incorporate area TPOs to the east and ancient woodland to the south and west. It is also notable that the more significant areas considered ecologically unsuitable in the current evidence are located on the Tandridge side of the proposal. The Redhill Brook and Salfords Stream corridors are undevelopable, but as they are currently of rather low ecological interest, a large-scale holistically-planned development offers the opportunity to restore natural environmental interests.

- The wider area is considered to be free from high-level ecological constraint. Good master planning could protect and connect existing features of ecological interest
- The River Mole Biodiversity Opportunity Area is in the north eastern part of the broad location. This is a regionally identified priority area of opportunity for restoration and creation of Priority Habitats and should be considered as areas of opportunity, not constraint.
- There is a second BOA - Earlswood & Redhill Commons to the River Mole which covers most of the broad location although mostly on the west side within Reigate & Banstead. There is potential for a significant contribution to the specific objectives of both Biodiversity Opportunity Areas, but it could prove equally difficult to avoid compromising their overall aim and purpose.
- There is potential for the restoration of the stream which is simplified around the airfield and culverted underneath it in order to contribute towards a positive gain for biodiversity.

5.13.5 Conclusions

All three broad locations have significant negative environmental impacts. However, these have to be balanced against the need to provide housing in line with government targets.

Redhill Aerodrome

The Redhill Aerodrome site affords good rail access to train travel via number of nearby stations residents would have access to. It currently has poor road access, although offers the prospect of accessing the M23. The Redhill Aerodrome broad location benefits from its proximity to Gatwick Airport, Redhill, Crawley and mainline stations into London. Redhill Aerodrome is not without environmental constraints, including flood risk and the presence of Biodiversity Opportunity Areas.

However, the fundamental issue for the Redhill Aerodrome option is not a Sustainability Appraisal issue, since it relates to delivery timescales. A garden settlement here would be reliant on a new junction and link road from the M23 and given the uncertainty of this, represents a significant obstacle in being able to consider development at this broad location deliverable within the plan period. As a consequence, it means there are two realistic options for timely delivery of a Garden Settlement within the plan period – South Godstone and Blindley Heath.

South Godstone

South Godstone benefits from access to sustainable transport - primarily the railway. Access to employment via train, bus, the A22, M25 and proximity to Lambs Business Park is recognised as a positive quality in employment terms and that any new development here would be well served in accessing local and wider employment opportunities. Development would significantly increase the need for energy consumption and would need to be a consideration for the development and the potential for sustainable energy generation/CHP, although potential opportunities such as the Waste Local Plan allocation at Lambs do exist. The open land here provides scope to create a central settlement hub and address key TDC garden village design principles. The landscape of this area would need careful consideration to avoid visually sensitive areas, such as the higher ground in the far northern areas of the broad location.

South Godstone is relatively free of flood risk compared to Blindley Heath and Redhill Aerodrome, however air quality impacts would be relatively more severe. This location has scope to address pre-existing issues within the District:

- Secondary schools are located towards the periphery of the district. Consequently those sites in more central locations in the district, such as South Godstone and Blindley Heath, have journey distances of over 6km to the closest secondary school;
- Access to facilities and amenities, such as convenience stores and / or supermarkets, is limited for the villages in the central area of Tandridge.
- There is a lack of access to strategic scale accessible natural greenspace, particularly in the South of the District.

For South Godstone, the area south of the railway line appears to be the most sustainable location. It is less environmentally constrained whilst affording access to the train station, A22 and a bus service. In addition the open land here provides scope to create a central settlement hub and address key TDC garden village design principles (e.g. 4, 6 and 10). The far northern area is more sensitive in landscape terms and would need to be considered suitably if any development were to take place.

On balance of considerations, South Godstone is the preferred location of the three for a new garden Settlement.

Blindley Heath

Blindley Heath is currently a small rural settlement which has very limited service provision. A petrol station and associated shop are the main source for convenience goods. This option performs relatively poorer when assessed against economic objectives. This option seems likely to provide less housing, thereby reducing scope for new services to serve the wider District, as well as likely increasing pressure for further housing allocations in unsustainable locations elsewhere in the District

The adverse impact on the SSSI is unknown but also a concern for the deliverability of development within this broad location.

This location has scope to address pre-existing issues within the District:

- Secondary schools are located towards the periphery of the district. Consequently those sites in more central locations in the district, such as South Godstone and Blindley Heath, have journey distances of over 6km to the closest secondary school;
- Access to facilities and amenities, such as convenience stores and / or supermarkets, is limited for the villages in the central area of Tandridge.
- There is a lack of access to strategic scale accessible natural greenspace, particularly in the South of the District.

Within the Blindley Heath broad location itself, the western side of the A22 appears to be less constrained and preferable to the land east of the A22 in sustainability terms. However, on balance of considerations, Blindley Heath is not the preferred location of the three for a new Garden Settlement.

5.14 SA of Further Options for Garden Community

The SA of the preferred garden community location 'South Godstone' as it appears in Our Local Plan: 2033 can be found at Section 5.21 which includes an assessment of the vision, principles, objectives and policies. Section 5.14 assesses some of the options behind key aspects of the Local Plan's approach to South Godstone and it will help inform the components strategic policy and the forthcoming AAP, but not the specific location.

5.14.1 Garden Community: Low Carbon /Renewable Energy Approaches and Principles

Table 60	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Option 1: No specific low carbon principles/ policy	0	0	0	0	0	0	0	-	-	-	0	0	0	-	0	0
Option 2: Policies/principles promoting use of low-carbon, renewable energy	0	0	0	0	0	0	0	0/+	0/+	0/+	0	0	0	0	?/-	0
Option 3: Requirement that Settlement that is self-suffient in terms of energy requirements	0	0/+	0	0	0	0	0	++	++	++	0	0	0	+	?/-	0
Option 4: Commitment to, and Application of, the TCPA Garden City Principles and Standards <ul style="list-style-type: none"> • New Garden Cities can be and must be exemplars of zero-carbon and energy-positive new development, using zero-carbon and energy-positive technology to ensure climate resilience. • To achieve this exemplar ambition, energy planning and spatial planning must be fully integrated. • Commitment to Energy Masterplan to define opportunities 	0	0/+	0	0	0	0	0	++	++	++	0	0	0	+	?/-	0
Commentary and Conclusions	<p>In March 2016, the Council first announced its intention to pursue a preferred spatial strategy that included a Garden Community and that the development would accord with the Town and Country Planning Association's (TCPA) Garden City Principles. The TCPA principles are well established and considered, by the planning industry, to provide a best practice framework for development and delivery of strategic scale new community developments.</p> <p>One of the TCPA principles is to use zero-carbon and energy-positive technology to ensure climate resilience.</p> <p>The TCPA has produced a series of supporting guidance notes with practical steps and Guide 4 addresses Energy and Climate Change. This places much emphasis on the importance of developing an Energy Masterplan to define opportunities. Particular opportunities include Energy from Waste, CHP and district heating which will need close coordination with partners such as Surrey CC.</p> <p>A commitment at the outset to achieve a self-sufficient settlement utilising zero-carbon and energy-positive technology to ensure climate resilience is clearly the most sustainable option.</p>															

5.14.2 Strategic Green Infrastructure alongside South Godstone Garden Community

Table 61	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport and Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality	Landscape	Biodiversity
Option 1: Strategic GI (500ha+)	? / - -	+	0	+ / ++	0	0 / +	0	+	+	+	+	+	0	+	+	++
Option 2: Strategic GI (100ha+)	? / -	+	0	+	0	0 / +	0	0 / +	0 / +	+	+	+	0	+	+	+ / ++
Option 3: Strategic GI (40ha+)	? / -	0 / +		0 / +	0	0	0	0 / +	0 / +	0 / +	0 / +	0 / +	0	0 / +	0 / +	+
Option 4: Strategic GI (20ha)	0	0 / +	0	0	0	0	0	0	0	0	0	0	0	0	0	0 / +
Option 5: No strategic GI. Local open space provision only.	+	-	0	-	0	0	0	0	0	-	-	-	0	-	0	? / -
Commentary and Conclusions	<p>There are five options under consideration for strategic green infrastructure in relation to the Garden Settlement.</p> <p>This issue is linked to policy commitments elsewhere in the plan, in particular the commitment in open space policies to Natural England's ANGST standards, and also the preference for siting the new Garden Settlement centrally within the District at South Godstone.</p> <p>Natural England's ANGSt model is not one single standard, but a series of standards that apply at different scales. Supporting evidence in the form of the Open Space Assessment demonstrated a significant area of deficit against both 100ha and 500ha GI in the south of the District. Therefore, both options 1 and 2 aligns with Open space standards (ANGST). The provision of a new Garden Village offers a potentially unique opportunity to address this.</p> <p>Green infrastructure brings significant benefits in terms of biodiversity, public recreation opportunities, health and climate change adaptation and resilience. Knock on benefits may be for air quality, flood risk and landscape (if GI is designed to compliment landscape character).</p> <p>Provision of a strategic scale GI may reduce residents propensity or likelihood of travelling further to access strategic scale open spaces, which may typically be ecologically sensitive international sites. This was a point from the HRA process - which noted that SANG is generally a minimum of 40ha to function effectively.</p> <p>Within the SA this reduced likelihood of travel means beneficial outcomes in respect of both objectives 4 and 16, as well as air quality - which may also be a direct benefit as well as indirect. There may even be marginal economic benefits as a large strategic scale GI retains more revenue from recreational expenditure within the District itself, as well as improving the attractiveness of the location to appeal to inward investors.</p> <p>The only possible negative for larger scale strategic GI provision may be in terms of housing delivery (Obj. 1), both in terms direct land take and viability considerations. Although the evidence would justify meeting the 500ha deficit against ANGSt, the scale of the new settlement is such that this doesnot seem likley to be achievable, whereas 100ha is a more manageable quantity in light of the scale of the South Godstone development that would still demonstrate a net gain in biodiversity.</p> <p>To maximise ecological benefits, it will be important to ensure that GI of any scale links to the wider network, and provides 'stepping stone' habitats where possible. Opportunities should be sought for creation and enhancement of priority habitats.</p> <p>GI provides scope for multi-functional SuDS provisions, reducing flood risk and aligning with aims of Eden BOA - particularly at larger scales. Wetland habitat management will in turn benefit water quality.</p> <p>Overall it appear that 100ha is the most sustainable and viable option that accords with wider policy aims.</p>															

5.14.3 Provision of Three 3G Pitches within South Godstone Garden Community

Table 62: 3G Pitch Provision at South Godstone Garden Community	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Do not Provide any 3g pitches	0	--	0	0/-	0	0	0	0	0	0	0	0	0	0	0	0
Provide one 3g pitch	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Provide three 3g pitches	0/+	++	0	0/+	0	0	0	0	0	0	0	0	0	0	0	0
Provide five 3g pitches	0/+	++	0	0/+	0	0	0	0	0	0	0	0	0	0	0	0
Commentary	<p>The provision of 3g pitches was an identified need from the Playing Pitch Strategy. 3g pitches are popular with sports clubs and bodies, particularly for training. 3g allows many more hours of playing time compared to traditional grass pitches, which are subject to wear and tear. As such, one 3g pitch has an equivalent playing time value of several grass pitches whilst having much less land take.</p> <p>3g can be utilised for football, hockey and rugby, as well as other sports. However they are not suitable for all pitch sports such as cricket.</p> <p>The main benefit is to health and healthy lifestyles (Objective 2). However, there may also be marginal benefits to objective 4 since the provision of a recreation facility that is currently lacking in the District may reduce residents propensity to travel elsewhere, particularly if the new provision is centrally located so as to be accessible to all residents.</p>															

5.15 SA of Options: Ashdown Forest Recreational Impacts

5.15.1 Context

Special Protection Areas (SPA)

SPAs are strictly protected sites classified in accordance with Article 4 of the EC Directive on the conservation of wild birds (79/409/EEC), also known as the Birds Directive, which came into force in April 1979. They are classified for rare and vulnerable birds, listed in Annex I to the Birds Directive, and for regularly occurring migratory species.

The Ashdown Forest

Ashdown Forest is an extensive block of common land covering around 3,000ha between East Grinstead and Crowborough in East Sussex and forms one of the largest areas of continuous heathland in south-east England. Ashdown Forest was classified as an SPA in March 1996 because it supports bird populations of European importance which are listed on Annex I of the Directive:

- Dartford Warbler *Sylvia undata*, 29 pairs representing at least 1.8% of the breeding population in Great Britain (count as at 1994);
- Nightjar *Caprimulgus europaeus*, 35 pairs representing at least 1.0% of the breeding population in Great Britain (two year mean, 1991 & 1992). The Nightjar is a ground-nesting bird.

Low recreational disturbance is a key environmental condition to support site integrity.

The HRA identified that recreational impacts upon the Ashdown Forest need to be mitigated and this section of the SA considers options for that.

Habitats Regulations Assessment

This Section 5.15 of the SA should be read in cross-reference to the HRA, where matters related to Ashdown Forest recreational pressures are also given detailed consideration, drawing on the evidence of the 2016 Visitor Survey.

5.15.2 Mitigation Options

There are essentially two main types of mitigation:

1. Provide a financial contribution towards a Strategic Access Management and Monitoring (SAMM) strategy. This aims to manage visitors on-site at Ashdown Forest and the strategy will involve joint working with the other affected local authorities, the Conservators of Ashdown Forest and Natural England.
2. The provision of Suitable Alternative Natural Greenspace (SANG) which is a greenspace that is of a quality and type suitable to be used as mitigation to offset the impact of new development on the Ashdown Forest SPA. A SANG site could either be provided on the development site itself or through a financial contribution towards a strategic SANG.

Tandridge is a co-signatory to an Interim Strategic Access Management and Monitoring (SAMM) Strategy. The SAMM Strategy should help introduce measures to mitigate against the effect of increased patronage to the Ashdown Forest that new development would bring. Local Authorities (Wealden, Mid Sussex, Lewes, Tunbridge Wells, Tandridge and Sevenoaks) who are likely to deliver residential development near to Ashdown Forest SPA have agreed to coordinate a strategic approach to collect developer contributions to deliver access management and monitoring measures. Such a strategic approach ensures development can be delivered and ensures potential issues with recreation are resolved.

Ashdown Forest Mitigation Zone and Options

The data that was collected from the Ashdown Forest Visitor Survey 2016 can be utilised to inform the identification of the Ashdown Forest SPA Mitigation Zone. The HRA analysed the key findings in this respect and this section should therefore read in conjunction with the HRA.

Table 63: Ashdown Forest Mitigation Zone	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	
	Housing	Health	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality	Landscape	Biodiversity	
No ZoI	O / +	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	- -
5km	O / +	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	- -
7km	O / +	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	O / +
10km	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+
15km	O / -	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+
Across all Tandridge District	O / -	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+
Allow bespoke mitigation on a case by case basis	O / +	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+
Specify a 7km mitigation zone but do not specify mitigation measures	O / -	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	? / - -

Commentary

The choice of options stems from duty to cooperate discussions with other authorities, interpretations of the visitor survey results as well as analysis of this by relevant authorities.

The HRA, cooperative working with other authorities, and analysis of the Visitor Surveys all suggest that 7km is the most appropriate mitigation zone to capture the majority of visitors. A 7km distance does not cover the entire recreational catchment of the SPA/SAC but does cover the core catchment within which the overwhelming majority of regular visitors derive. Therefore, a net change in population within this 7km zone has a realistic possibility of a significant net change in visitor pressure within the SPA and thus an increased risk of an adverse effect. A 7km distance will cover the vast majority of circumstances within which recreational pressure on the SAC/SPA needs consideration as an impact. However, because the 7km distance is somewhat artificial (and only an estimate at this stage), it is conceivable that developments slightly outside this zone may still contribute to recreational activity to a material extent. For example, one can envisage a situation in which the impacts from recreational pressure of a large housing development slightly further than 7km from the SAC/SPA boundary may also warrant HRA screening. It is to cover these circumstances that the approach employs a degree of flexibility.

For objective 1, there are marginal viability implications from collecting contributions across a wider area. Conversely, a zone of influence of 5km (which has been applied by some Local Planning Authorities in relation to the Thames Basin Heaths) would effectively exclude Tandridge and therefore benefit development viability in our District.

Conversely, contributions towards SAMM will benefit from biodiversity (Obj 16), in particular the bird species of European importance which are listed on Annex I of the Directive. In the short, medium and long term there will be benefits to the key bird species from access management.

The access management projects drawn up with the Ashdown Forest Conservators within the Ashdown Forest SPA Monitoring Strategy 2018 are very much focused on access management at this stage, so have very limited applicability to other SA objectives other than 16-Biodiversity.

In the longer term, there may also be marginal benefits to objectives 10 and 15 from the programme, particularly if one considers maintenance of ecosystems to be a component of climate change adaptation and that the proposed measures will help valuable ecosystems to be more resilient to the threat of climate change.

Bespoke mitigation may also be appropriate in some circumstances, but need to be discussed and agreed by the District Council following advice from Natural England. It seems reasonable that a policy allows sufficient flexibility for this to take place, whilst offering standardised SAMM/SANG solutions that will prove convenient to the majority of applicants.

The final option 'Specify a 7km mitigation zone but do not specify mitigation measures' is distinct from the penultimate option because it would not have SAMM/SANG as ready-made mitigation options. This approach would simply note the zone within which mitigation would be required, sufficient to enable a conclusion of no adverse effect on integrity of the SPA alone or in combination. This would give applicants maximum flexibility to propose mitigation solutions. However, it would carry with it many of the risks of the 'no policy' option, given uncertainty as to what mitigation will be acceptable and an inability to deliver or manage any mitigation solution strategically. For biodiversity it carries the risk of negative outcomes. In addition, the lack of certainty it would give developers combined with the lack of a ready-made solution, would likely negate any potential benefits for them, and it may lead to delays in the planning system.

It was not considered necessary to re-visit earlier work¹¹ which looked at alternative types of access management projects that would sit within the Strategic Access Management and Monitoring Strategy (SAMMS). This is because the SAMMS policy approach has been in progress for several years during which time the neighbouring authorities have cooperatively entrusted the consideration and design of the SAMMS to Wealden District Council as the 'Lead Authority' and sole point of contact with the Conservators of the Forest (Ashdown Forest lies wholly within Wealden District). This agreement has enabled Wealden DC, working with Natural England as advisors, to efficiently explore and negotiate with the Conservators deliverable projects capable of mitigating the effects of visitor pressure on the Forest. It would not be appropriate at this stage to undermine that established and cooperative approach by re-visiting potential SAMMS projects. Such an approach would also be disproportionate to the level of development expected in Tandridge relative to the other contributing authorities.

¹¹ Earlier work carried out by Wealden in the HRA of their Core Strategy and Strategic Sites HRA and also earlier work carried out by Mid-Sussex and Wealden Councils on behalf of the affected authorities within the 7km zone in relation to the production of the SAMMS.

SANG Options

Table 64: SANG Options	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality	Landscape	Biodiversity
No SANG contributions	0 / +	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-
SANG contributions from larger developments within 7km Mitigation Zone	0 / -	0 / +	0	0 / +	0	0	0	0	0	0 / +	0	0	0	0 / +	0	+ / ++
SANG contributions from all developments within 7km Mitigation Zone	-	0 / +	0	0 / +	0	0	0	0	0	0 / +	0	0	0	0 / +	0	++

Commentary

As a result of Duty to Cooperate working with other authorities, supported by SA, it has been agreed that 7km is the only reasonable option for a mitigation zone based upon joint analysis of the evidence.

However, within these confines there remains further matters to consider as to how, or even if, SANG is delivered.

The first option 'No SANG' is an option previously considered by Lewes District Council which would require financial contributions to fund access management, but not require the provision of SANG. Whilst relief from having to contribute towards SANG may suit developers and the viability/profit of their schemes (objective 1), there seems little justification for such an approach which would have negative impacts upon the Forest, as well as setting an unfortunate precedent in terms of joint working, albeit the last matter is not an SA consideration.

The second option, the approach of only collecting from larger developments within a certain zone, does have a precedent elsewhere. For example, the Thames Basin Heaths SPA has a rarely-mentioned outer mitigation zone of 5-7km, within which only large developments (50 dwellings and upwards) need to contribute to mitigation, on the basis that development within that zone is acknowledged to be likely to contribute to recreational pressure to a smaller extent than development within 5km. Quote from the Mole Valley District Thames Basin Heaths explanatory note: *'Within this 5 - 7km buffer area Natural England consider developments of 50 dwellings or more should be assessed on a case by case basis for the provision of appropriate mitigation'*.

Due to the situation of Tandridge's geographical relationship to the Forest, a 5-7km zone and a 7km zone are effectively the same thing when applied to Tandridge since the TDC boundary is approximately 5km from the edge of the Ashdown Forest. Given the scale of development anticipated within Tandridge within 7km (the Local Plan makes no allocations in this area) it raises the question of proportionality, given the administrative burdens of ensuring mitigations in place vis-à-vis the quantities are likely to be collected. This is particularly the case with SANG which are typically at least 40ha to comply with the relevant SANG guidelines (both Natural England and Wealden DC have produced SANG guidelines). Therefore the scale of windfall development that can be expected within Tandridge's 7km mitigation zone is highly unlikely to be capable of delivering a SANG on-site. However such factors are not SA considerations, in terms of the agreed framework's 'decision aiding questions'. Furthermore, cooperative working with partner authorities has recognised that 7km is the appropriate mitigation zone. The approach of only collecting from larger developments (in effect applying the Thames Basin approach) could be argued to be contrary to the agreed approach.

Therefore, the final option of SANG contributions from all developments within the 7km mitigation zone is considered most appropriate. The provision of SANG resulting from said contributions, even if not located within Tandridge, will result in benefits primarily in respect of objective 16 Biodiversity. There will also be knock on benefits in terms of health (Obj 2) and reducing the need to travel (Obj 4), climate change mitigation (Obj 10) and air quality (Obj 14).

The recognition of positive effects even if not primarily within the District Council's borders is in accordance with the trans-boundary approach required by SA.

Dog Control

Table 65: Ashdown Forest Dog Control	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	
	Housing	Health	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality	Landscape	Biodiversity	
Option 1: Bye-law control all dogs kept on a lead in the SPA.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+
Option 2: Current SAMP measures (Code of conduct for dog walkers, Volunteer Dog Rangers, Dog Training Programme, etc)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0 / +
Option 3: No Dog control measures – either hard or soft	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-
Commentary	<p>Dog let off the lead can have a potentially damaging effects on the integrity of the SPA. This is particularly considering that one of the key reasons for designation is the presence of the Nightjar (an Annex 1 species) which is a ground-nester. The threat can be via increased nest predation by natural predators or dogs when adults are flushed from the nest or deterred from returning to it by the presence of people or dogs; or chicks or eggs dying of exposure because adult birds are kept away from the nest;</p> <p>As set out in the HRA, dog control does form part of the SAMP measures, including a code of conduct for dog walkers, volunteer dog rangers, dog training programme, etc. So option 2 effectively represents the current situation. However, the current approach falls short of an outright ban of dogs not on leads. Furthermore, the Visitor Survey reported that the majority (64%) of dog-walkers had not changed their behaviour in any way as a result of the guidance, which clearly brings into question its effectiveness.</p> <p>Therefore, if current measures are not proving as effective as they could be it warrants consideration of the option of the introduction of a bye-law requiring all dogs kept on a lead in the SPA. In terms of meeting SA objectives option 3 appears preferable, although it is important to note that Tandridge District Council has no direct control over this matter.</p>																

The final Ashdown Forest policy as it appears in the Local Plan is also subject to SA in section 5.16, drawing on many of the findings of the options considered in this section.

Cross-reference should also be made to Section 5.14.2, where the options of new strategic scale green infrastructure adjacent to the new Garden Community is assessed. This is justified against Natural England's Accessible Natural Greenspace Standard (ANGSt), but will have potentially have knock on benefits for the Ashdown Forest if it incorporates SANG standard and quality greenspace.

5.16 SA's of Local Plan: 2033 - Development Policy Options

5.16.1: Policy TLP01- Spatial Strategy

The spatial strategy, as well as alternatives to it, have been assessed as part of the assessment of options - see section 5.8.

Therefore it is not necessary to replicate.

5.16.2: Policy TLP02 -Presumption in favour of Sustainable Development

Policy: Presumption in favour of Sustainable Development	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	+	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0
Alternative Option: No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Potential Mitigations	None identified.															
Commentary and Conclusions	This is a model policy wording that was originally produced by the Planning Inspectorate.in 2012. The aim is to ensure Local Plans are based upon and reflect the presumption in favour of sustainable development.															

5.16.3: Policy TLP03 - Green Belt

Policy: Green Belt	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	+ / ++	+	++	N/a	0	0	0	+	+	+	+	+	+	+	++	++
Alternative Option: No Policy	++	-	--	N/a	0	0	0	-	-	-	-	-	-	-	--	--
Potential Mitigations	The draft policy may benefit from clarifying that changes to the green belt boundary will result from other policies (i.e. site allocations) within this plan.															
Commentary and Conclusions	<p>Matters relating to Green belt are not an SA consideration in the established East Surrey SA framework. Nonetheless, the SA assessment of this policy looks at how green belt designation affects the 16 SA objectives from a wider economic, social and environmental perspective.</p> <p>The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. However, green belt also has purposes 'to assist in safeguarding the countryside from encroachment' and to 'preserve the setting and special character of historic towns'. Although, the planning principles that apply to the green belt are set out nationally, it is the role of local authorities to define the extent of it. Therefore, the alternative option of not having this policy is taken to assume there would be no green belt in Tandridge. Whilst that is not a realistic option, the assessment does help demonstrate the huge value of the green belt in securing environmental and social benefits.</p> <p>The policy does also add a key local context in clarifying that the South Godstone Garden Settlement will justify a change to the green belt boundary, although setting out that the detail of the exact boundary will be subject to a forthcoming AAP. In doing this, the policy provides further certainty of housing delivery by removing any doubt that green belt policy may prevent the delivery of the South Godstone Garden Settlement.</p>															

5.16.4: Policy TLP04 - Infrastructure Delivery and Financial Contributions

Policy: Infrastructure Delivery and Financial Contributions	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	+	++	0	++	0	0	0	+	0	+	+	+	+	+	0	+
Alternative Option: No Policy	++	--	0	--	0	0	0	-	0	-	-	-	-	-	0	-
Potential Mitigations	None identified															
Commentary and Conclusions	<p>The commitment to the collection of financial contributions towards infrastructure delivery is key to the sustainability of the plan in several respects. Infrastructure can take many forms - transport related, health related, green infrastructure, flood defences, etc. The policy commitment to phasing of development subject to resolution of infrastructure constraints is a further positive measure.</p> <p>Financial contributions may in certain circumstances impact upon the viability and deliverability of development (Obj 1), but overall and In conclusion, this essential policy brings many positive sustainability benefits.</p>															

5.16.5: Policy TLP05 - Development Viability

Policy: Development Viability	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	++	0	0	0	0	0/+	0/+	0	0	0	0	0	0	0	0	0
Alternative Option: No Policy	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Potential Mitigations	None identified															
Commentary and Conclusions	This pragmatic policy may help secure delivery of development in case of marginal viability. It is a worthwhile policy that should help avoid site becoming stalled by financial constraints.															

5.16.6: Policy TLP06 - Urban Settlements

Policy: Urban Settlements (Tier 1)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	+	+	+	+	+	+	+	0	0	0	0	0	0	+	0	0
Alternative Option: No settlement hierarchy	+	-	-	-	-	-	-	0	0	0	0	0	0	-	0	0
Alternative Option: Other settlements suitability to be classified as Urban Settlements 'Tier 1'.	See SA of 'Individual Settlements – their Status in the Strategic Settlement Hierarchy and its Implications for their Suitability for Growth.'															
Potential Mitigations	None identified															
Commentary and Conclusions	<p>The identification of a settlement hierarchy is a key tool employed by the Local Plan to ensure that development is appropriate to its location. As such it gives some certainty to the development industry and residents alike of the Council's preferred development locations. Not having a settlement hierarchy would lead to unrestricted pressure for development in unsustainable locations.</p> <p>'Urban settlements' are tier 1 and the highest level of the hierarchy within the District, as originally defined in the 2015 settlement hierarchy. The following settlements are all classed as 'Tier 1': Caterham on the Hill, Oxted, Caterham Valley, Warlingham, Hurst Green, Whyteleafe, Limpsfield.</p> <p>Tandridge is a polycentric rural district with no large centres of population, so classification at the top of the hierarchy as 'tier 1' should be interpreted in that context. However, ensuring that tier 1 and 2 settlements are a focus for development improves sustainability in economic, social and environmental respects. It ensures new populations are focused where access to services and public transport is most advantageous. It also reduces pressure on smaller settlements and rural locations where environmental constraints are typically greater. Therefore the inclusion of this policy is the sustainable option.</p> <p>The detail of where settlements may appropriately be considered in the hierarchy is considered under the SA of 'Individual Settlements – their Status in the Strategic Settlement Hierarchy and its Implications for their Suitability for Growth.'</p>															

5.16.7: Policy TLP07: Semi-Rural Service Settlements

Policy: Semi-Rural Settlements (Tier 2)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport & Services	P. Developed Land	Economics	Employment	C. Change Mitigation	Natural Resources	C. Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	+	+	+	+	+	+	+	0	0	0	0	0	0	+	0	0
Alternative Option: No settlement hierarchy	+	-	-	-	-	-	-	0	0	0	0	0	0	-	0	0
Alternative Option: Other settlements suitability to be classified as Semi-Rural Settlements 'Tier 2'	See SA of 'Individual Settlements – their Status in the Strategic Settlement Hierarchy and its Implications for their Suitability for Growth.'															
Potential Mitigations	None identified															
Commentary and Conclusions	<p>The identification of a settlement hierarchy is a key tool employed by the Local Plan to ensure that development is appropriate to its location. As such it gives some certainty to the development industry and residents alike of the Council's preferred development locations. Not having a settlement hierarchy would lead to unrestricted pressure for development in unsustainable locations.</p> <p>'Semi-rural settlements' are tier 2 and the second highest level of the hierarchy within the District, as originally defined in the 2015 settlement hierarchy. The following settlements are all classed as 'Tier 2': Godstone, Lingfield, Smallfield.</p> <p>Tandridge is a polycentric rural district with no large centres of population, so classification higher up the hierarchy should be interpreted in that context. However, ensuring that tier 1 and 2 settlements are a focus for development improves sustainability in economic, social and environmental respects. It ensures new populations are focused where access to services and public transport is most advantageous. It also reduces pressure on smaller settlements and rural locations where environmental constraints are typically greater. Therefore the inclusion of this policy is the sustainable option.</p> <p>The detail of where settlements may appropriately be considered in the hierarchy is considered under the SA of 'Individual Settlements – their Status in the Strategic Settlement Hierarchy and its Implications for their Suitability for Growth.'</p>															

5.16.8: Policy TLP08 - Rural Settlements

Policy: Rural Settlements (Tier 3)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	-	+	+	+	+	+	+	0	+	0	0	0	+	+	+	+
Alternative Option 1: No settlement hierarchy	+	-	-	-	-	-	-	0	-	0	0	0	-	-	-	-
Alternative Option 2: Defined settlement hierarchy, but no defined settlement boundary for Tier 3 settlements	? / - -	0	0	+	-	0	0	0	0	0	0	0	0	0	0	0
Alternative Option 3: Other settlements suitability to be classified as Rural Settlements 'Tier 3'	See SA of 'Individual Settlements – their Status in the Strategic Settlement Hierarchy and its Implications for their Suitability for Growth.'															
Potential Mitigations	None identified															
Commentary and Conclusions	<p>The identification of a settlement hierarchy is a key tool employed by the Local Plan to ensure that development is appropriate to its location. As such it gives some certainty to the development industry and residents alike of the Council's preferred development locations. Not having a settlement hierarchy (Alternative Option 1) may lead to unrestricted pressure for development in unsustainable locations, with detrimental environmental and social effects..</p> <p>'Rural settlements' are tier 3 and the third highest level of the hierarchy within the District, as originally defined in the 2015 settlement hierarchy. The following settlements are all classed as 'Tier 3': Bletchingley, South Godstone, Blindley Heath, South Nutfield, Dormansland, Tatsfield, Felbridge, Woldingham, Old Oxted. Tandridge is a polycentric rural district with no large centres of population, so classification higher up the hierarchy should be interpreted in that context. Ensuring that tier 3 and 4 settlements are not a focus for development allocations improves sustainability in economic, social and environmental respects. It ensures that new populations are not located where access to services and public transport is poor and where rural character may be harmed by inappropriate levels of development. Allocations at this scale would almost inevitably be on greenfield sites in rural locations with further sustainability implications. Therefore the inclusion of this policy is the sustainable option.</p> <p>It should be noted though, that the policy does allow for small-scale development in certain circumstances - within defined settlement boundaries, via exception sites or where allocated within a Neighbourhood Plan. Not having a defined settlement boundary (Alternative option 2) would limit the scope for small scale housing development still further, with restrictive policies applying even within villages, thereby limiting scope to utilise previously developed land.</p> <p>The detail of where settlements may appropriately be considered in the hierarchy (Alternative Option 3) is considered under the SA of 'Individual Settlements – their Status in the Strategic Settlement Hierarchy and its Implications for their Suitability for Growth.'</p>															

5.16.9: Policy TLP09 - Limited & Unserviced Settlements

Policy: Limited & Un-serviced Settlements (Tier 4)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	-	+	+	+	+	+	+	0	+	0	+	0	+	+	+	+
Alternative Option 1: No settlement hierarchy	+	-	-	-	-	-	-	0	-	0	0	0	-	-	-	-
Alternative Option 2: No Tier 4 in the hierarchy. Current Tier 4 settlements classed as countryside	--	+	+	+	+	+	+	0	+	0	0	0	+	+	+	+
Alternative Option 3: Define a settlement boundary for Tier 4 settlements	0/+	0	0	0/-	0	0	0	0	0	0	0	0	0	0	0	0
Alternative Option 4: Other settlements suitability to be classified as Limited & Un-serviced Settlements 'Tier 4'	See SA of 'Individual Settlements - their Status in the Strategic Settlement Hierarchy and its Implications for their Suitability for Growth.'															
Potential Mitigations	None identified															
Commentary and Conclusions	<p>The identification of a settlement hierarchy is a key tool employed by the Local Plan to ensure that development is appropriate to its location. As such it gives some certainty to the development industry and residents alike of the Council's preferred development locations. Not having a settlement hierarchy (Option 1) would lead to unrestricted pressure for development in unsustainable locations.</p> <p>'Limited & Un-serviced Settlements ' are tier 4 which is the fourth and lowest the third level of the hierarchy within the District, as originally defined in the 2015 settlement hierarchy.</p> <p>Ensuring that tier 3 and 4 settlements are not a focus for development allocations improves sustainability in economic, social and environmental respects. It ensures that new populations are not located where access to services and public transport is poor and where rural character may be harmed by inappropriate levels of development. Allocations at this scale would almost inevitably be on greenfield sites in rural locations with further sustainability implications.</p> <p>The alternative option 2 of doing away with the lowest tier 4 level of the hierarchy is considered since it could be argued that there comes a scale where a settlement is indivisible from the wider countryside. However, alternative option 2 is not preferred because even at tier 4 settlements have a recognisable identity and sense of place. Furthermore, a tier 4 classification does allow for exception sites and development via Neighbourhood Plans.</p> <p>However, tier 4 settlements do not have a defined settlement boundary, unlike tier 3. Alternative option 3 assesses the likely effects of defining a settlement boundary at this level of the hierarchy - a logical consideration given their application to tier 3. The effects are considered minimal, due to the limited opportunities at this scale. Although there would be a trickle of housing developments coming forward in locations generally removed from services and public transport.</p> <p>The detail of where settlements may appropriately be considered in the hierarchy is considered under the SA of 'Individual Settlements - their Status in the Strategic Settlement Hierarchy and its Implications for their Suitability for Growth.' In conclusion, the inclusion of this policy is the sustainable option. It should be noted that the policy does allow for small-scale development in certain circumstances - via exception sites or where allocated within a Neighbourhood Plan.</p>															

5.16.10: Policy TLP10 - Responsive Housing Strategy

Policy: Responsive Housing Strategy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	++	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Alternative Option 1: No policy	? / -	? / -	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Alternative Option 2: More prescriptive policy	? / ++	? / +	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Potential Mitigations	None identified.															
Commentary and Conclusions	<p>This policy helps ensure all members of the community are catered for in the housing market, thus fulfilling the aims of SA Objective 1. The outcomes of this policy have knock on effects on wellbeing (SA objective 2).</p> <p>Alternative option 1 of not having a policy at all would leave the supply of housing to the market. This would have unknown, and probably negative, consequences with some sectors less likely to be accommodated (e.g. social rented, self-build, etc.).</p> <p>Alternative option 2 of having more prescriptive requirements would bring the same benefits as the preferred policy in the short-term. However, in the medium and longer term this may be overly restrictive and not responsive to the changing needs of the housing market, or indeed to locally specific variations in the housing market requirements.</p> <p>Therefore the preferred policy allows for appropriate responses tailored to the need both at a point in time and at specific locations, based upon the most up to date evidence.</p>															

5.16.11: Policy TLP11 - Retention and Supply

Policy: Retention & Supply	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	+	0 / +	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Alternative Option 1: No policy	0 / -	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Potential Mitigations	None identified.															
Commentary and Conclusions	<p>Given the acknowledged housing needs, this policy has an important role in protecting against the loss of existing housing stock. Therefore it scores well against Objective 1. It has an inbuilt flexibility that allows for certain exceptions, such as wider regeneration benefits - this is an important caveat to avoid risks to economic objectives (SA Obj.6). It also allows for the provision of specialist housing, such as sheltered or supported housing schemes, where there is a demonstrable need. as such there may also be marginal benefits to health and wellbeing (Obj.2).</p> <p>Given the current strength of the housing market, the risks of not having the policy (the alternative option) are actually not particularly significant. Nonetheless, the policy is worthwhile and has clear sustainability benefits.</p>															

5.16.12: Policy TLP12 - Affordable Housing Requirement

Policy: Affordable Housing Requirement	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	++	+	0	0/+	+	0	0	0	0	0	0	0	0	0	0	0
Alternative Option 1: No policy	--	-	0	0	+	0	0	0	0	0	0	0	0	0	0	0
Alternative Option 2: Higher % requirements	+	0/+	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Alternative Option 3: Lower % requirements	+	0/+	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Alternative Option 4: Different % requirements according to brownfield/greenfield status of the site (i.e. incentivise brownfield with a lower % requirement)	+	0/+	0	0/+	+	0	0	0	0	0	0	0	0	0	0	0
Alternative Option 5a: No differential % between different levels of the settlement hierarchy (all 40%)	+	0/+	0/-	-	0/-	0	0	0	0	0	0	0	0	0	0/-	0/-
Alternative Option 5b: No differential % between different levels of the settlement hierarchy (all 20%)	+	0/+	0/-	-	0/-	0	0	0	0	0	0	0	0	0	0/-	0/-
Potential Mitigations	None identified															
Commentary and Conclusions	<p>The policy sets different percentages according to different locations, based both on position in the settlement hierarchy and on greenbelt status. It therefore seems appropriate to consider the implications of variations to this approach.</p> <p>The policy is considered to be the most sustainable option. It has been informed by technical evidence and will maximise the supply of affordable housing without compromising viability, whilst incentivising the priority of 'non-greenbelt' sites within higher order tier 1 settlements (urban).</p> <p>Paradoxically, higher percentage requirements (Option 2) and lower percentage requirements (Option 3) may both have similar detrimental effects on the overall supply of affordable housing. A higher % requirement may simply render some schemes unviable and undeliverable, with larger developers prioritising schemes in other authority areas. A lower % may simply fail to secure the same number of affordable houses from the finite supply of housing sites.</p> <p>The option of different requirements according to brownfield/greenfield status of the site (Option 4) has been considered during the development of the policy. Although this has many sustainability advantages, it is not considered practical due to the difficulties of applying it to sites which may be a mix of brownfield and greenfield.</p> <p>Options 5a and 5b would render higher order settlements relatively less attractive to the market, and lower order settlements more attractive. This may result in increased development pressure on more rural locations, particularly given the requirements to maintain a 5 year housing supply. This may have a knock effect on the balance of sustainable delivery in relation to SA objective 4, and also have negative effects on the District's rural cultural heritage (SA Obj. 4) as well as rural landscape and ecology (SA Objs 15 and 16). Given previously developed land is generally in higher order settlements, options 5a and 5b would also have a knock on negative effect on SA objective 5.</p>															

5.16.13: Policy TLP13 - Rural Housing Exception Sites

Policy: Rural Housing Exception Sites	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	++	+	0	? / -	0	0	0	0	0	0	0	0	0	0	? / -	0
Alternative Option 1: No policy	--	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Potential Mitigations	None identified															
Commentary and Conclusions	Addresses rural housing affordable housing need that would be difficult to address via any other mechanism. Assists local people in some of the least affordable areas, benefitting wellbeing. However, greenfield development in settlements that are generally considered unsustainable for standard housing allocations brings some risk of environmental harm.															

5.16.14: Policy TLP14 - Specialist Need Housing & Extra Care

Policy: Specialist Need Housing & Extra Care	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	+	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Alternative Option 1: No policy	? / -	? / - -	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Potential Mitigations	None identified.															
Commentary and Conclusions	Policies promoting the provisions of Specialist Need Housing & Extra Care will address a key market sector. This will primarily benefit the health and wellbeing of the vulnerable (SA Obj. 2) and securing appropriate types of housing (SA Obj.1). The alternative of having no policy would bring risks that this key sector would not be provided for, although the market may address the need in any event.															

5.16.15: Policy TLP15 - Gypsy, Traveller and Showpeople Provision

Policy: Gypsy, Traveller and Showpeople Provision	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	+	+	0	0 / +	0	0	0	0	0	0	0 / +	0	0 / +	0	0	0
Alternative Option 1: No policy	-	-	0	0 / -	0	0	0	0	0	0	0 / -	0	0 / -	0	0	0
Potential Mitigations	None identified.															
Commentary and Conclusions	The policy will provide for the needs of gypsies and travellers. It contains elements to ensure the health and wellbeing of occupants, as well as prioritising sustainable locations that are at risk from flooding or contamination.															

5.16.16: Policy TLP16 - Traveller Pitch/Site/Plot Design

Policy: Traveller Pitch/Site/Plot Design	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	+	+	0	0	0	0	0	0	0	0	0	0	+	0	0	0
Alternative Option: No policy	-	-	0	0	0	0	0	0	0	0	0	0	-	0	0	0
Potential Mitigations	None identified															
Commentary and Conclusions	Will help boost supply if clear guidance as to what constitutes an acceptable scheme in design terms is in place. Design principles promote health and wellbeing, and prevent siting on contaminated land unless there is amelioration prior to occupation. The alternative of no policy would require a reliance on the CLG good Practice Guidance from 2008 which is not possible since it was withdrawn on 01/09/2015. Nonetheless, the principles within it are considered to be of merit and a local policy will help ensure traveller sites are designed to the highest standards.															

5.16.17: Policy TLP17 - Health and Wellbeing

Policy: Health & Wellbeing	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	0	++	0	0/+	0	0	0	0	0	0	0	0	0	0	0	0
Alternative Option: No policy	0	+	0	0/-	0	0	0	0	0	0	0	0	0	0	0	0
Potential Mitigations	None identified															
Commentary and Conclusions	This is a sustainable policy that will promote health and wellbeing, acknowledging the wide range of means by which this can be achieved, and the range of related benefits.															

5.16.18: Policy TLP18 - Place-Making & Design

Policy: Place-Making & Design	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	0	+	+	+	0	0	0	+	0	+	0	0	0	0	0/+	0/+
Alternative Option: No policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Potential Mitigations	None identified.															
Commentary and Conclusions	Although place-making and design are not factors directly covered by the East Surrey SA objectives, there are multiple related benefits from this policy. Good design and a sense of place has the potential to benefit wellbeing (Objective 2). The policy includes reference to having 'regard to heritage assets and successfully integrate with the historic character' (Obj 3).. The policy benefits sustainable transport and accessibility by promoting permeability and connectivity, as well as cycle parking. Climate change mitigation and adaptation is addressed by part vii. Part IX of the policy may have marginal benefits in respect of SA objectives 15 and 16. Overall this policy contributes in several respects to sustainability goals.															

5.16.19: Policy TLP19 - Housing Densities & the Best Use of Land

Policy: Housing Densities & the Best Use of Land	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	+	? / -	0	+	+	0	0	0	0	0	0	0	0	0	0 / +	?
Alternative Option 1: No policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Potential Mitigations	Could emphasise particular appropriateness of higher densities in centres.															
Commentary and Conclusions	<p>There are several sustainability benefits to this policy. It may increase the overall supply of housing (SA objective 1). When combined with a strategy focused on tier 1 and 2 settlements where service provision and public transport accessibility is advantageous, higher densities may also benefit SA objective 4.</p> <p>The policy supports the utilisation of previously developed and brown field land (SA objective 5)</p> <p>Promoting higher densities may reduce the overall land-take of the District's housing numbers, particularly greenfield land-take. This may in turn indirectly benefit the goals of SA objective 15, and possibly 16 as well - although this has to be balanced by the risk of reduced <i>on-site</i> capacity for green infrastructure as a result of higher densities.</p>															

5.16.20: Policy TLP20 - Supporting a Prosperous Economy

Policy: Supporting a Prosperous Economy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	0	0	0	0 / -	+	+ / ++	+ / ++	0	0 / -	0	0	0	0	0 / -	0 / -	0 / -
Alternative Option 1: No policy	0	0	0	-	0	-	-	0	0	0	0	0	0	0	0	0
Potential Mitigations	Policy reflects national guidance by recognising that offices are a town centre use and therefore a sequentially preferred location.															
Commentary and Conclusions	<p>Further consideration of options behind this policy can be found in Section 5.9 .</p> <p>The options considered here also build upon consideration of the Economic Delivery Strategy, first initiated in the SA of the Issues and options in 2015.</p> <p>The preferred emerging policy is positive in respect of SA objectives 6 and 7, although the degree to which it can guarantee the protection of employment sites is tempered by the provisions of the General Permitted Development Order. It would see almost all employment provision delivered via intensification of existing employment sites. Given their predominantly rural location, this is not especially beneficial to objectives 4, 9, 14, 15 and 16.</p> <p>Alternative Option 1 'No Policy' seems likely to stifle the local economy. Perhaps surprisingly, lower local employment provision may have more negative effects on SA Objective 4 in terms of sustainable transport, as it may result in increasing levels of out-commuting.</p>															

5.16.21: Policy TLP21 - Employment Hierarchy

Policy: Employment Hierarchy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	0	0	+	+	+	++	++	0	0	0	0	0	0	0	+	+
Alternative Option: No policy	0	0	-	-	--	0	0	0	0	0	0	0	0	0	-	-
Potential Mitigations	None identified.															
Commentary and Conclusions	<p>The employment hierarchy is based upon the technical evidence in the form of the Economic Needs Assessment (ENA). In carrying out the detailed review of employment sites in the District, the ENA (2015) and ENA Update (2017) were able to identify those sites which are of most significant benefit to the area and those which also play an important role, albeit to a lesser extent. In seeking to protect those employment sites, proposals for development will be considered in line with the Council's Employment Hierarchy and where the site sits within it. The Employment Hierarchy consists of Strategic Employment Sites, Important Employment Sites, and all other existing employment sites. This seems the logical and reasonable approach based on sound technical evidence.</p> <p>The policy also acknowledges that national planning guidance prioritises town centres and requires any proposals for office space outside of town centres to demonstrate how it has responded to the sequential test.</p> <p>Therefore in terms of sustainability, the policy has a valuable role in directing employment development to the most appropriate locations. Previously developed land that has scope for intensification within existing employment sites seems likely to be the source of a significant source of supply. Such sites have been subject to ecology and landscape testing. Therefore the alternative option of not having an employment hierarchy comes with a risk of leading to pressure on sites which have detrimental environmental impacts. Therefore, consideration of the alternative 'no policy' approach has helped justify the value of the policy.</p>															

5.16.22: Policy TLP22 - Rural Economy

Policy: Rural Economy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	0	0	?/+	?/+	0	++	++	0	+	0	0	0	0	0	0	0
Alternative Option 1: No policy	0	0	-	-	0	-	-	0	-	0	0	0	0	0	0	0
Potential Mitigations	None identified.															
Commentary and Conclusions	<p>Positive commitment to protect rural services and facilities and support for the rural economy. Commitment to local services and community facilities may benefit SA objectives 3 and 4, whilst the alternative option of not having the policy would have a detrimental effect.</p> <p>Promotion of the local rural economy may be particularly beneficial in terms of objective 8 'Natural Resources' by helping to encourage the sustainable supply of local products or services.</p>															

5.16.23: Policy TLP23 - Protection, Provision and Enhancement of Schools

Policy: Protection, Provision and Enhancement of Schools	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	0	++	0	++	0/+	0	0	0	0	0	0	0	0	+	0	0
Alternative Option 1: No policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Potential Mitigations	None identified.															
Commentary and Conclusions	<p>The policy is positive in a number of respects. Accessibility to education services forms one of the 'decision-aiding questions' for SA objective 4, so measures that seek to ensure this walking, cycling and public transport are highly beneficial. This may have knock-on benefits for both health and air quality. The community use of playing fields may be similarly beneficial for health. There may be marginal benefits for previously developed land resulting from the 'flexible approach will be taken to the reuse and redevelopment of redundant schools and further education sites'.</p>															

5.16.24: Policy TLP24 - Retail Hierarchy

Policy: Retail Hierarchy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	0	+	0	++	0/+	+	+	0/+	0/+	0	0	0	0	0/+	0	0
Alternative Option 1: No policy	0	-	-	--	0	+	+	0/-	-	0	0	0	0	-	-	-
Alternative Option 2: Retail 2008 Core Strategy Hierarchy	0	+	0	+ / ++	0/+	0/+	0/+	0	0	0	0	0	0	0/+	0	0
Alternative Option 3: Identify a centre in all settlements (Tier 1, 2, 3)	? / -	0/+	? / -	++	0	0	0	0	0	0	0	0	0	0/+	0	0
Potential Mitigations	None identified.															
Commentary and Conclusions	<p>The emerging 'Reg 19' policy promotes town centre uses, including leisure, offices and retail within accessible locations, according to their status in the hierarchy. It promotes the economic health of our centres, which in turn supports local services in locations accessible by sustainable means - which has a knock on health and air quality benefit for the community. The hierarchy in the policy has been informed by the 'Town and Local Centre Review' so is considered the most appropriate based on technical evidence.</p> <p>Alternative option 1 'no policy' may lead to increased pressure for 'out of town' retail provision, with an associated detrimental effect on the environment.</p> <p>In relation to alternative option 2, it seems appropriate to reconsider the previous hierarchy identified in the 2008 Core Strategy, which was:</p> <ol style="list-style-type: none"> 1. Caterham Valley and Oxted 2. Warlingham and Lingfield 3. Caterham Hill 4. Whyteleafe 5. Other local centres and villages <p>The Core Strategy protected less centres and was less defined in its explanation of the role of different types of centre. It is also important to note that retail centres are dynamic and their role may change over time. Therefore it would not be appropriate to simply roll forward a previous hierarchy and the Council has proactively re-assessed the hierarchy based on the latest evidence.</p> <p>It is also useful to draw out the distinction between the retail hierarchy and settlement hierarchy, if indeed one is actually appropriate. The consideration of alternative option 3 does this. The application of Alt.Option 3 would essentially mean the retail hierarchy mirrors the settlement hierarchy, by applying a rigid approach of delineating a retail core in all Tier 1, 2 and 3 settlements. However, it is important to note that the settlement hierarchy is defined on a much wider range of factors, including the presence of schools, and access to the strategic road network. The retail hierarchy provides a more nuanced assessment on the ground of a centres role, primarily in relation to existing presence of retail provision. Therefore, enforcing a centre definition on all centres may not be appropriate in all cases, and may lead to inappropriate land use planning decisions as a result.</p>															

5.16.25: Policy TLP25 - Retail Frontages

Policy: Retail Frontages	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	0 / +	0 / +	+	+	0 / +	+	+	0 / +	0 / +	0	0	0	0	0 / +	0 / +	0
Alternative Option 1: No policy	0	0 / -	0 / -	-	0 / -	0	0	0 / -	0 / -	0	0	0	0	0 / -	0 / -	0
Potential Mitigations	None identified.															
Commentary and Conclusions	<p>Defined retail frontages help concentrate retail provision in designated centres, generally where public transport accessibility is greatest and where pedestrian accessibility is maximised. This allows services to be accessible by sustainable modes and to all groups in the community.</p> <p>Not having defined frontages may lead to a wider spatial spread of retail provision, reducing likelihood of linked trips and increasing car dependency. For larger scale centres it may also lead to pressure for out-of-town provision with associated landscape impacts which is more likely to not be on previously developed land.</p> <p>Vibrant and vital centres have economic benefits and ensures activity (and associated noise) is focused in core areas rather than being spread into residential areas. The avoidance of concentrations of uses will help prevent anti-social behaviour, benefitting wellbeing. Residential use are supported above ground floor, which in turn supports a safer evening economy.</p> <p>The policy is more protective of primary and secondary centres, but its provisions have the effect of allowing more flexibility over the loss of isolated shops or shops in smaller neighbourhood centres.</p> <p>The policy also seeks to protect village shops, which may be an important part of a communities cultural heritage.</p>															

5.16.26: Policy TLP26 - Development Within and Outside Town and Local Centres, Sequential Testing and Retail Impact

Policy: Development within and outside Town and Local Centres, Sequential Testing and Retail Impact.	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	0	+	0	++	+	+	+	0	0	0	0	0	0	0 / +	0	0
Alternative Option 1: No policy	0	-	0	--	-	0	0	0	0	0	0	0	0	0 / -	0	0
Potential Mitigations	None identified.															
Commentary and Conclusions	<p>Focusing retail and other town centre development in designated centres reduces car dependency by allowing services to be accessible by sustainable modes and to all groups in the community. Vibrant and vital centres have social benefits and ensures activity (and associated noise) is focused in core areas rather than being spread into residential areas. The policy does not apply to smaller scale proposals, ensuring that the policy will not prove unduly onerous on smaller businesses and those based around the rural economy.</p>															

5.16.27: Policy TLP27 - Retail Provision

Policy: Retail Provision	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	0	0	0	0	0	+	+	0	-	0	0	0	0	0	0	0
Alternative Option 1: No policy	0	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0
Potential Mitigations	None identified.															
Commentary and Conclusions	The quantums specified are based in the projections and recommendations of technical evidence and are therefore considered the only reasonable option. The policy has an in-built flexibility by allowing proposals to reflect updated evidence. The primary benefit of this policy is economic for objectives 5 and 6, by confirming the need for new proposals and thereby justifying future proposals. Development inevitably may require resources as part of construction.															

5.16.28: Policy TLP30 - Green and Blue Infrastructure

Policy: Green & Blue Infrastructure	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	0 / -	++	0	0	0	0 / +	0	0	0	++	+	0 / +	0	0 / +	+	++
Alternative Option 1: No policy	0 / +	-	0	0	0	0	0	0	0	-	-	0 / -	0	0 / -	-	-
Potential Mitigations	None identified.															
Commentary and Conclusions	The promotion of green and blue infrastructure has multiple environmental and social benefits. These can be direct benefits such as increased habitats and connectivity for biodiversity, or improved landscape quality. Other benefits may be longer term or more indirect, such as improved health and wellbeing as a result of improved contact with nature and opportunities for passive recreation. Green infrastructure may also help protect from climate change including flood protection and urban cooling from the heat island affect, which may also benefit air quality. An improved environment may even have an economic benefit in improving the attractiveness and appeal of locations as places to live and do business.															

5.16.29: Policy TLP31 - Public Rights of Way

Policy: Public Rights of Way	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	0	++	+	+ / ++	0	0	0	0	0	0	0	0	0	0	0	0
Alternative Option 1: No policy	0	-	-	- / --	0	0	0	0	0	0	0	0	0	0	0	0
Potential Mitigations	None identified.															
Commentary and Conclusions	Protection and enhancement of the District's rights of way network primarily benefits healthy lifestyles and enjoyment of passive recreation opportunities in the countryside. It affords opportunities to enjoy our cultural heritage and promotes walking as a means of transport.															

5.16.30: Policy TLP32 - Landscape Character

Policy: Landscape Character	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	0	0	++	0	0	0	0	0	0	0	0	0	0	0	++	0 / +
Alternative Option 1: No policy	0	0	--	0	0	0	0	0	0	0	0	0	0	0	--	0 / -
Potential Mitigations	None identified															
Commentary and Conclusions	Whilst the nationally designated Surrey Hills and High Weald Areas of Outstanding Natural Beauty are the key landscape designations, there are other landscapes that whilst not of national importance, have their own distinctive attractive character which need to be recognised appropriately. These apply District-wide, so if properly applied this policy has the potential to benefit a much wider spatial extent of the District. This may also have knock on benefits for biodiversity by protecting landscape features which also have ecological value.															

5.16.31: Policy TLP33 - Surrey Hills and High Weald Areas of Outstanding Natural Beauty

Policy: Surrey Hills and High Weald Areas of Outstanding Natural Beauty	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	0	0	++	0	0	0	0	0	0	0	0	0	0	0	++	0/+
Alternative Option 1: No policy	0	0	--	0	0	0	0	0	0	0	0	0	0	0	--	0/-
Potential Mitigations	None identified															
Commentary and Conclusions	The AONBs are primarily landscape designations, but also an important part of the District's cultural heritage . Their protection will have associated benefits for biodiversity (SA Objective 16) since many AONB character features (such as ponds and hedgerows in the High Weald AONB) are also important for biodiversity.															

5.16.32: Policy TLP34 - Area of Greater Landscape Value and Area of Outstanding Natural Beauty Candidate Areas

Policy: Area of Greater Landscape Value and Area of Outstanding Natural Beauty Candidate Areas	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	0	0	+	0	0	0	0	0	0	0	0	0	0	0	+	0
Alternative Option 1: No policy	0	0	-	0	0	0	0	0	0	0	0	0	0	0	-	0
Potential Mitigations	None identified															
Commentary and Conclusions	The AONBs are primarily landscape designations, but also an important part of the District's cultural heritage . Their benefit is similar to that of the AONBs, albeit to a lesser extent, commiserate with their status.															

5.16.33: Policy TLP35 - Biodiversity, Ecology and Habitats

Policy: Biodiversity, Ecology and Habitats	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	0	0	+	0	0	0	0	0	+	+	+	+	0	+	+	++
Alternative Option 1: No policy	0	0	-	0	0	0	0	0	-	-	-	-	0	-	-	--
Potential Mitigations	None identified															
Commentary and Conclusions	The policy primarily benefits biodiversity (Objective 16). However, there are knock-on benefits from this policy for a number of other environmental objectives, including landscape, air and water quality, natural resources, climate change adaptation and cultural heritage (i.e. ancient woodland)															

5.16.34: Policy TLP36 - Ashdown Forest Special Protection Area

Policy: Ashdown Forest Special Protection Area	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	0 / -	0 / +	0	0 / +	0	0	0	0	0	0 / +	0	0	0	0 / +	0 / +	++
Alternative Option: No policy	0 / +	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-
Potential Mitigations	No further mitigations identified															
Commentary and Conclusions	<p>The consideration of options related to the Ashdown Forest were drawn out in detail in the earlier section 5.15, as well as the HRA. This section considers the resulting policy. Therefore the alternative option of no policy at all is not a realistic proposition. More discrete considerations of policy elements were contained in earlier sections. The policy primarily benefits biodiversity (Objective 16) stemming from the Council's statutory obligations regarding the Ashdown Forest. Mitigation contributions will benefit bird species of European importance which are listed on Annex I of the Directive. However there are knock-on benefits from this policy for a number of other environmental objectives, including landscape, air and water quality, natural resources and climate change adaptation in helping protect valuable ecosystems to be more resilient to the threat of climate change. There may be very marginal viability impacts in respect of option 1.</p>															

5.16.35: Policy TLP37 - Trees and Soft Landscaping

Policy: Trees and Soft Landscaping	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	0	+	0 / +	0	0	0	0	0	0	+	0 / +	0	0	+	++	++
Alternative Option 1: No policy	0	-	0 / -	0	0	0	0	0	0	-	0 / -	0	0	-	--	--
Potential Mitigations	None identified															
Commentary and Conclusions	Trees and soft landscaping benefit the landscape, ecology and natural capital of the District. Trees and soft landscaping also have an important role in limiting the impact of rainfall, increasing temperatures, leisure experiences, air quality, climate change adaptation, health and wellbeing.															

5.16.36 Policy TLP38 - Play and Open Space

Policy: Play and Open Spaces	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	0 / -	++	0	++	0	0	0	+	0 / +	++	+	+	0 / +	+ / ++	+	++
Alternative Option 1: No policy	+	--	0	--	0	0	0	-	0	-	? / -	? / -	0	-	-	-
Alternative Option 2: Adopt Woodland Trust access standards	0 / -	++	0	++	0	0	0	+	+	++	+	+	0	+ / ++	+	++
Option 3: Adopt Natural England Angst standards	0 / -	++	0	++	0	0	0	+	0 / +	++	+	+	0 / +	+ / ++	+	++
Potential Mitigations	Adoption of the Woodland Trust Access standard would secure even greater environmental and social benefits, although many of these positives will inevitably be achieved by the adoption of Natural England's Angst standards.															
Commentary and Conclusions	<p>Overall there are significant benefits to this policy and to the application of open space standards. Benefits of sufficient open space are in terms of access to services such as parks and playgrounds (SA Objective 4) improved health and wellbeing (SA Objective 2). There are other environmental benefits, primarily as a result of the inclusion and adoption of Natural England's ANGSt standard within the preferred policy. This includes benefits to climate change adaptation in terms of the role greenspaces have in urban cooling; improved air quality and potential benefits to flood risk and water quality from reduced run-off.</p> <p>ANGSt (Option 3) standards are recommended by supporting evidence (Open Space Study) and since they actually form part of the proposed Local Plan policy, all potential benefits of option 3 are inevitably reflected in the assessment of option 1.</p> <p>The Open Space study also referenced Woodland Trust access standards, hence their consideration as a reasonable option. These have many sustainability benefits although are ambitious to implement, deliverable only in the medium and longer term, and have not been taken forward in the plan. However it should be noted that many of the benefits of the Woodland Trust standard will be achieved by the adoption of Angst standards.</p>															

5.16.37: Policy TLP39 - Providing Playing Pitches and Built Leisure Facilities

Policy: Providing Playing Pitches and Built Leisure Facilities	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	0 / -	++	0	++	0	0	0	0	0	0 / +	0 / +	0	0	0 / +	0	0
Alternative Option 1: No policy	+	--	0	--	0	0	0	0	0	0 / -	0 / -	0	0	0 / -	0	0
Potential Mitigations	None identified															
Commentary and Conclusions	<p>The primary benefit in ensuring adequate supply of sport and leisure provision is to health and wellbeing (SA Obj 2) and in accessible services (SA Obj. 4). There are marginal secondary benefits in terms urban cooling (Obj 10), air quality (Obj 14) and reduced flood risk (Obj 11) - as there would be from the provision of any greenspace in an urban context.</p> <p>Pitches are a potential source of housing supply if not protected, so the policy may limit housing delivery to some extent.</p> <p>In conclusion though this is a necessary and sustainable policy, primarily for its social benefits and to a lesser extent, environmental benefits.</p>															

5.16.38 Policy TLP40 - Burial Space

Policy: Burial Space	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Alternative Option 1: No policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Potential Mitigations	None identified															
Commentary and Conclusions	The content of this policy does not really touch upon the Sustainability Framework objectives.															

5.16.39: Policy TLP41 - Tourism

Policy: Tourism	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	0	0	+	0	0	+	+	0	0	0	0	0	0	0	0	0
Alternative Option 1: No policy	0	0	-	0	0	-	-	0	0	0	0	0	0	0	0	0
Potential Mitigations	None identified.															
Commentary and Conclusions	Tourism benefits the economy and provides employment opportunities. The policy protects key tourism assets, whilst setting out criteria new proposals should fulfil to be supported. Several existing tourist attractions and festival also have a heritage value, which this policy also seeks to protect. This policy will have an overall positive effect in terms of sustainability.															

5.16.40: Policy TLP42 - Hotels and Tourist Accommodation

Policy: Hotel & Tourist Accommodation	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	0	0	0	0	0	+	+	0	0	0	0	0	0	0	0	0
Alternative Option 1: No policy	0	0	0	0	0	-	-	0	0	0	0	0	0	0	0	0
Potential Mitigations	None identified.															
Commentary and Conclusions	Tourism benefits the economy and provides employment opportunities. The policy protects key tourism accommodation whilst noting the market demand for new accommodation, drawing on evidence.															

5.16.41: Policy TLP43 - Historic Environment

Policy: Historic Environment	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	0	0	++	0	0	0	0	0	0	0	0	0	0	0	+	0
Alternative Option 1: No policy	0	0	--	0	0	0	0	0	0	0	0	0	0	0	-	0
Potential Mitigations	None identified.															
Commentary and Conclusions	This is a positive policy in respect of protecting cultural heritage (SA Obj.3), which in the context of this policy includes important archaeology, historic buildings, conservation areas, monuments, street patterns, streetscapes, landscapes and commons; as well as their settings The inclusion of commons and landscapes, means there is also a positive effect in respect of objective 15, albeit to a lesser extent.															

5.16.42: Policy TLP44 - Renewable Energy Infrastructure

Policy: Renewable Energy infrastructure	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	0	0/+	0	0	0	0	0	++	++	++	0	0	0	+	?/-	0
Alternative Option 1: No policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Potential Mitigations	Proposals will need to be mindful of restrictions in respect of locations proximity to the Gatwick Safeguarding Zone in respect of wind turbines and large scale solar (Glint and glare assessment required).															
Commentary and Conclusions	The provision of renewable and low carbon energy schemes will be beneficial in respect of SA objectives 8, 9 and 10. The term 'Accessibility' in this context generally refers to the necessary highways infrastructure to facilitate ongoing maintenance; or in the case of biomass (or similar) facilities the need to transport fuels - by rail, water or road. This is not to be confused with reference to environmental sustainability in other parts of the plan which generally refers to public access by foot, cycle or public transport. Some renewable and low carbon technologies, particularly wind turbines, come with a risk of some landscape impact which needs to be balanced against the considerable wider sustainability benefits these technologies can bring. Positive benefits in terms of air quality (Obj.14), and by implication health (Obj.2) may be on the macro or trans-boundary scale, rather than local scale, since renewable and low carbon technologies are generally much less polluting than the alternatives of fossil fuels and nuclear.															

5.16.43: Policy TLP45 - Energy Efficient & Low Carbon Development

Policy: Energy Efficient & Low Carbon Development	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	0	0 / +	0	0	0	0	0	++	++	++	0	0	0	+	? / -	0
Alternative Option 1: No policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Potential Mitigations	None identified.															
Commentary and Conclusions	The policy is supportive of renewable and low carbon energy and is therefore positive in impacts on climate change mitigation and adaptation. Effects may be felt in the medium and longer term and on a trans-boundary and cumulative nature as part of a national and global shift in patterns of energy use. The policy acknowledges the importance of energy reduction by users, as well as integrating in low-carbon and renewable technologies into development from the outset. The policy also acknowledges that the design and siting of renewable energy still has potential implications for the wider environment, primarily in terms of landscape impacts. However, potential impact needs to be balanced against the considerable wider sustainability benefits these technologies can bring.															

5.16.44: Policy TLP46 - Pollution and Air Quality

Policy: Pollution and Air Quality	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	0	++	0	0	0	0	0	+	0	+	0	++	+ / ++	++	0	0 / +
Alternative Option 1: No policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Potential Mitigations	None identified.															
Commentary and Conclusions	This policy primarily benefits SA objectives 14, 13, 2 and 12. Improved air quality is also beneficial in terms of climate change (Obs. 8 and 10), and also has knock on benefits for species and habitats (Obj. 16). The policy is based on recent evidence, but with an inbuilt flexibility to remain relevant for the medium and longer term by acknowledging the need to be in accordance with strategies which may still be emerging. Overall, the inclusion of the policy has clear sustainability benefits.															

5.16.45: Policy TLP47 - Sustainable Urban Drainage and Reducing Flood Risk

Policy: Sustainable Urban Drainage and Reducing Flood Risk	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	0 / -	+	0 / +	0	0	0	0	0	0	++	++	+ / ++	0 / +	0	0 / +	+ / ++
Alternative Option 1: No policy	0 / +	-	0 / -	0	0	0	0	0	0	--	--	- / --	0 / -	0	0 / -	- / --
Potential Mitigations	None identified.															
Commentary and Conclusions	Although primarily designed to address flood risk (SA Obj. 11), which is increasingly important in light of addressing the effects of climate change (Obj. 10), this policy has multiple other benefits. Improvements in water quality (Obj. 12) should be achieved through a sustainable drainage system management train, thereby removing pollutants that would otherwise have reached the water-table via run-off. Multi-functional SuDS such as ponds, wetlands, swales and green roofs may also have significant benefits for biodiversity, benefitting protected species such as the Great Crested Newt. Such features may also improve landscape character (Obj. 15) and ponds are considered to be a key character feature of the countryside, particularly noted in the High Weald AONB Management Plan. Increased localised contact with nature and water features is biennial to health and well-being (Obj.2) and SuDS may also be multi-functional in terms of providing amenity space. The provision of SuDS may have a marginal impact on site capacity for development (Obj 1), although effects are negligible and far outweighed by the significant sustainability benefits of this policy.															

5.16.46: Policy TLP48 - Water Consumption and Waste Water

Policy: Water Consumption and Waste Water	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy: Optional water efficiency requirement (110 litres per day)	0	0	0	0	0	0	0	0 / +	++	+	+	++	0	0	0	0
Alternative Option 1: National Building Regulations standard (125 litres per person per day)	0	0	0	0	0	0	0	0 / -	--	-	-	--	0	0	0	0
Potential Mitigations	None identified.															
Commentary and Conclusions	This matter is considered in recognition of the fact that Tandridge is within a water stress area. The application of this policy will primarily benefit SA objectives 9 (Natural resources) and 12 (Water quality). Rainwater harvesting form of SuDS, so may also benefit flood risk (SA Obj. 11). This policy is an environmentally sustainable measure that will also benefit climate change adaptation and mitigation.															

5.16.47: Policy TLP49 - Waste

Policy: Waste	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	0	0	0	0	0	0	0	0	++	0	0	0	0/+	0/+	0	0
Alternative Option 1: No policy	0	0	0	0	0	0	0	0	--	0	0	0	0/-	0/-	0	0
Potential Mitigations	None identified.															
Commentary and Conclusions	The provisions of this policy primarily benefit SA Objective 9 'To use natural resources prudently', which promotes reuse and recycling of materials and management of waste close to where it arises. There are marginal knock on benefits with the provisions of this policy reducing the risks of contamination and pollution. The policy is sustainable and beneficial to the plan.															

5.16.48: Policy TLP50 - Sustainable Transport and Travel

Policy: Sustainable Transport & Travel	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	0	++	0	++	0	0	0	++	+	0/+	0	0	0	++	0	+
Alternative Option 1: No policy	0	--	0	--	0	0	0	--	-	0/-	0	0	0	--	0	-
Potential Mitigations	None identified.															
Commentary and Conclusions	This policy benefits sustainability in multiple overlapping ways. Reducing the need to travel and improving accessibility to all sectors of the community (including the young and the old) is key to objective 4. This in turn encourages walking and cycling, benefitting health (Objective 2). Reductions in car dependency may benefit air quality (Objective 14), as will measures to encourage and facilitate the take-up of electric vehicles. This in turn has wider trans-boundary benefits for addressing climate change mitigation (Objective 8), and natural resources (Objective 9) by reducing reliance of fossil fuels. Improve air quality, particular reductions in vehicle emissions, may in turn benefit protected habitats and help the Council meet its obligations in terms of the Habitats Regulations. Positive effects across most measures may be felt more in the medium and longer term as part of the facilitation of more sustainable choices.															

5.16.49: Policy TLP51 – Airport Related Parking

Policy: Airport Related Parking	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	0	0	0 / +	+	0	0 / +	0 / +	0 / +	0	0	0	0	0	+	0	0
Alternative Option 1: No policy	0	0	0 / -	-	0	0 / -	0 / -	0 / -	0	0	0	0	0	-	0	0
Potential Mitigations	None identified.															
Commentary and Conclusions	This is a policy that prevents airport related parking in the District. The policy supports the airport in trying reduce reliance on private transportation and to encourage users to access the airport by public transport. This will also benefit air quality (objective 14) and reduce emissions (Objective 8) by discouraging and reducing unnecessary car journeys in the District. Airport parking may be unsightly and at odds with the rural character of the District (Objective 3), as well as occupying sites that may otherwise have been utilised for employment purposes (objectives 6 and 7).															

5.17 SA of Local Plan: 2033 Spatial Policy Options – Town Centre Regeneration

5.17.1: Policy TLP28 - Caterham Town and Local Centre

Policy: Caterham Town and Local Centre	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	++	0	0	+	++	++	++	0	0	0	0	0	0	0 / +	0 / +	0
Alternative Option 1: No policy	-	0	0	0	-	0	0	0	0	0	0	0	0	0 / -	0 / -	0
Potential Mitigations	C/R to Caterham Town Centre Masterplan SPD SEA/SA.															
Commentary and Conclusions	The policy is focused on urban regeneration so benefits objectives 5 and 6. it also includes a substantial quantity of residential (190 units) thereby benefitting objective 1. Development will be on previously developed land (Objective 5). Improved pedestrian connectivity will be beneficial in respect of objective 4. Caterham has good public transport provision, so it is likely that most new residents will not need a private car. In addition retail clawback may reduce the propensity to travel further afield to access town centre services. Both these factors may benefit air quality (objective 14), relative to the alternative of residential provision on greenfield sites. The Caterham Town Centre proposal have also been extensively reviewed as part of the Caterham Town Centre Masterplan SPD SEA/SA, which is available on line at https://www.tandridge.gov.uk/Planning-and-building/Regeneration-and-major-projects/Caterham-masterplan															

5.17.2: Policy TLP29 - Oxted Town Centre

Policy: Oxted Town Centre	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	++	+	0	+	++	++	++	0	0	0	0	0	+	0 / +	0 / +	0
Alternative Option 1: No policy	0	-	0	0	-	0	0	0	0	0	0	0	-	0 / -	0 / -	0
Potential Mitigations	Some contamination remediation may be required.															
Commentary and Conclusions	Aims to deliver 60 residential units, although given their location within a settlement boundary the alternative of no policy would not actually prevent housing delivery on these sites. Delivery of this policy would have many other benefits, including improved retail offer, provision of office space and associated employment - all on previously developed land. Prioritising footpaths and cyclist provision has sustainability, health and air quality benefits.															

5.18 SA's of Local Plan: 2033 Housing Sites Policy Options

5.18.1: Policy HSG08 - 156-180 Whyteleafe Road, Caterham

This is HELAA site 'CAT 007'. It is proposed for approximately 60 residential units.

156-180 Whyteleafe Road, Caterham (HEELA CAT 007)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
	++	++	-	++	-	0	+	0	+	0	+	-	-	+	0/+	0/-
Commentary on Economic Objectives	A reasonably well connected area of the District in respect of employment opportunities.															
Commentary on Social Objectives	A relatively well connected area of the District in respect of services. Directly adjacent to primary and secondary schools. Close to a bus route.															
Commentary on Environmental Objectives	Backland site with partial cover by immature deciduous tree cover on northern and western sections (not S41 standard), which connects to mature woodland to east. Mature woodland to east is partially ancient, though ancient sections are some 90m from the eastern site boundary. Nonetheless there is direct habitat connection to ancient woodland so continued green corridor connectivity throughout the site is important to achieve a net gain in biodiversity.															
Potential Mitigations	<p>Incorporate stepping stone corridors (as defined in background ecological assessment), as well as TPOs and mature trees and within layout as much as possible.</p> <p>Enhanced screening on south side for dual purpose of privacy for school and enhanced stepping stone corridor.</p> <p>Site is located within a groundwater source zone so should ideally incorporate SuDS benefitting water treatment.</p> <p>Improved pedestrian and cycle access and links would further improve site connections to the wider area.</p>															
Conclusions	A sustainable site, subject to identified mitigations.															

5.18.2: Policy HSG06 - Land off Salmons Lane West, Caterham

This is HELAA site 'CAT 040'. It is a 4.45ha site proposed for approximately 75 residential units.

Land off Salmons Lane West, Caterham (HEELA Cat 040)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
	++	++	-	++	+	-	-	0	0	0	+	-	-	+	0/-	0/-
Commentary on Economic Objectives	A reasonably well connected area of the District in respect of employment opportunities. Technically though, redevelopment of the site FOR residential purposes would represent a net loss since the most recent use of the northern sections was workshops, although ancillary to airfield.															
Commentary on Social Objectives	A relatively well connected area of the District in respect of services.															
Commentary on Environmental Objectives	<p>Site wholly within Kenley Airfield Conservation Area and completely surrounds listed building 'Former NAAF/Institute'.</p> <p>In groundwater source zone.</p> <p>A number of mature tree specimens are on site, including along access corridor. Eastern fringes defined as priority habitat and connect to a significant ecological network.</p> <p>Within impact zone of Riddlesdown SSSI impact zone.</p>															
Potential Mitigations	<p>The site will require extremely sensitive design taking full account of its heritage features and value, including the setting of the central listed Former NAAF/Institute.</p> <p>Design should aim to facilitate connection to the wider ecological network which continues off-site across a significant geographical area. Other mature trees on site, including along access corridor, warrant retention in any layout.</p> <p>Site is almost 1km from nearest children's play area, so well outside the 480m accessibility standard and could consider provision of a children's play area on site, subject to heritage constraints and type of residential development provided.</p> <p>Site is located within a groundwater source zone so should ideally incorporate SuDS benefitting water treatment.</p> <p>Potential contamination risk from former military use? - May require investigation and possible remediation.</p> <p>Natural England will need to be consulted in relation to SSSI Impact zone.</p> <p>Improved pedestrian and cycle access and links would further improve site connection with the surrounding area.</p>															
Conclusions	A sustainable site, subject to sensitive design and identified mitigations.															

5.18.3: Policy HSG09 - Land at Fern Towers, Harestone Hill

This is HELAA site 'CAT 044'. It is proposed for approximately 6 residential units.

Land at Fern Towers, Harestone Hill (HEELA CAT 044)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
	+	++	0	++	+	0	+	0	+	0	+	-	+	+	+	0
Commentary on Economic Objectives	A reasonably well connected area of the District in respect of employment opportunities.															
Commentary on Social Objectives	A relatively well connected area of the District in respect of services. Residential curtilages in close proximity, layout scheme will need to be mindful of neighbouring amenities, need to avoid loss of light, etc. Loss of parking may lead to local congestion?															
Commentary on Environmental Objectives	In groundwater source zone.															
Potential Mitigations	Hardstanding site slightly raised relative to adjacent properties. Would benefit from SUDs, perhaps permeable paving, to avoid risk of run-off from site. Site is located within a groundwater source zone so should incorporate SuDS benefitting water treatment in any event. Scope for solar panels if site could be orientated with south facing roof space.															
Conclusions	Subject to confirmation that parking can be adequately replaced or accommodated on-street to the satisfaction of the Highways Authority, and subject to mitigations, this may represent a sustainable site.															

5.18.5: Policy HSG07 - Coulsdon Lodge, Coulsdon Road, Caterham

This is HELAA site 'CAT 081'. It is proposed for approximately 15 residential units.

Coulsdon Lodge, Coulsdon Road, Caterham (HEELA CAT 081)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
	+	++	0	++	0/+	0	0	0	+	0	+	-	+	+	+	-
Commentary on Economic Objectives	A reasonably well connected area of the District in respect of employment opportunities. Site is partially previously developed land.															
Commentary on Social Objectives	A relatively well connected area of the District in respect of services. Layout will need to be mindful of amenities of neighbouring residential curtilages.															
Commentary on Environmental Objectives	TPOs on site and significant mature tree belt on south and east sides of site. Classed as minority ecologically suitable in 2017 ecology Assessment. In groundwater source zone. Within impact zone of Riddlesdown SSSI impact zone.															
Potential Mitigations	The layout will be driven by tree protection. Retention of mature boundary trees as green corridor habitat network (connecting off-site to south-west), including a suitable root protection area should be a priority. Site is located within a groundwater source zone so should ideally incorporate SuDS benefitting water treatment, possibly alongside multi-functional green corridor to facilitate a biodiversity gain. Natural England will need to be consulted in relation to SSSI Impact zone.															
Conclusions	May be sustainable subject to mitigations. Although, the target of 15 units could only realistically be achieved by smaller apartments.															

5.18.6: Policy HSG05 - Sandiford House, 40 Stanstead Road, Caterham

This site was identified through the Urban Capacity Study and is site 'UCS 002'. It is proposed for approximately 14 residential units.

The SA assessment is based upon the draft policy at the time of writing.

Sandiford House, 40 Stanstead Road, Caterham (HEELA UCS 002)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
	+	++	0	++	+	0	0	0	-	0	+	-	0	0	+	0
Commentary on Economic Objectives	A reasonably well connected area of the District in respect of employment opportunities.															
Commentary on Social Objectives	A relatively well connected area of the District in respect of services.															
Commentary on Environmental Objectives	Larger tree specimens to rear, hedges at boundaries. In groundwater source zone.															
Potential Mitigations	Redevelopment would improve the street scene and character of the area. Retain mature trees and hedges in layout. Site is located within a groundwater source zone so should ideally incorporate SuDS benefitting water treatment.															
Conclusions	An admittedly unattractive block in a low density residential area, but it is difficult to see how a significant net gain could be achieved or development made viable as a result. Neighbouring plots to west have been subject to backland development (houses).															

5.18.7: Policy HSG11 - Land to the West of Godstone

This is HELAA site 'GOD 010'. It is proposed for approximately 150 residential units.

Land to the West of Godstone (GOD 010)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
	++	++	-	-	-	0	+	0	-	0	+	-	-	-	0/-	0
Commentary on Economic Objectives	Adjacent to local employment, although this location is likely to appeal to commuters due to ease of access to M25.															
Commentary on Social Objectives	Although part of Godstone, a tier 2 settlement with reasonable service provision, this is a fringe site and the highway pattern encourages car dependency. Opportunities for direct pedestrian routes to local services are limited. The site is located by junction 6 of the M25 which further suggests the degree it may integrate with Godstone may inevitably be limited.															
Commentary on Environmental Objectives	Proximity to M25 may be a cause of noise pollution. Surrounded on three sides by groundwater protection zone with access point and west boundary within it. Wholly within Biodiversity Opportunity Area. Within SSSI impact zone. Ancient woodland, and Potential SNCI alongside access road. Partially with AONB at access points and AONB is adjacent to west of site. Considered majority suitable in ecology assessment.															
Potential Mitigations	There is a shortfall of amenity open space in Godstone and this site is more than 1km from the nearest children's playground (which is small and in poor condition). This is well beyond the 480m accessibility standard and this site should therefore provide a children's play area on site, as well as amenity open space. Retain and enhance existing woodland and hedges as far as possible. Opportunity to instate access woodland and full SNCI. Opportunity to connect ancient woodland to north of site with offsite woodland to the south via a habitat corridor down the east boundary, which would also serve as a buffer to adjacent residential curtilages. SuDS benefitting water treatment should be incorporated given proximity and presence of groundwater source protection zone. There is scope for multifunctional wetland (recommended by ecological assessment) that will provide habitats for Great Crested Newt which have been recorded in vicinity. Several protected species of bat (Pipistrelle, Brant's, Whiskered, Natterer's, Brown Long-Eared) have also been recorded in the vicinity. Installation of bat boxes on site may also help move towards a net gain in biodiversity. Consult NE in relation to SSSI Impact zone. Satisfactory screening will need to be in place to prevent visual impact to from AONB. Retain Public Rights of Way. improve cycle connections to reduce car dependency. Junction improvements to reduce congestion.															
Conclusions	A sustainable site given the housing need, subject to the above mitigations.															

5.18.8: Policy HSG10 - William Way Builders Merchant, 38-42 High Street, Godstone

This is HELAA site 'GOD 021'. It is proposed for approximately 18 residential units.

William Way Builders Merchant, 38-42 High Street, Godstone (HEELA GOD 021)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
	+	++	0	0	+	0	-	?/+	-	0	+	-	+	0	+	0
Commentary on Economic Objectives	Site will result in loss of employment site, but poor quality open storage uses not well suited to a central location within an urban area. Other local employment is present in the vicinity, as well as retail provision.															
Commentary on Social Objectives	Good location opposite small convenience store, with playground at rear and located on a bus route.															
Commentary on Environmental Objectives	Redevelopment brings scope for environmental improvements on this brownfield site. Current use is a bad neighbour for surrounding residential area - piles of building materials are possible cause of dust. Redevelopment for residential and/or retail uses will improve the local living environment. Conservation area located a short distance (35m) to the south.															
Potential Mitigations	Will need careful consideration on neighbouring amenities in light of residential curtilages in close proximity which may place limit on building height/number of storeys, although scope for slightly higher on south-east section of site. Should retain active frontage on B2236. SuDS benefitting water treatment would be advantageous in this location within the groundwater source zone - perhaps green roofs, and/or permeable paving would be suited to this brownfield urban site.															
Conclusions	Lends itself to higher density residential (apartments possible), with commercial uses on ground floor frontage. A reasonably sustainable site, with scope to improve the character of the area subject to detail of design.															

5.18.9: Policy HSG12 - Land at The Old Cottage, Station Road, Lingfield

This is HELAA and Urban Capacity site 'LIN 030 and UCS011'. It is proposed for approximately 60 residential units. The SA assessment is based upon the draft policy at the time of writing.

Land at The Old Cottage, Station Road, Lingfield (HEELA site LIN 030 and UCS 011)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
	++	++	?/-	+	-	0	+	0	-	0	0/+	0/-	-/-	+	0/-	0/-
Commentary on Economic Objectives	Lingfield is a semi-rural service settlements with a good range of retail services and some local employment. This site relates well to the central core and its development would support the local economy.															
Commentary on Social Objectives	Currently public access is limited to the existing public footpath and the site is private pasture. The site relates well to the centre of the village. A public footpath passes across the northern section providing a direct route to village core which would benefit future residents, although compromising the recreational value of the route for walkers.															
Commentary on Environmental Objectives	Western and northern sections are within conservation area, adjacent to the Star Public house and New Place Farm Oast. The site is pasture land of Agricultural land quality grade 3. Hedgerows Rivers and streams in vicinity (NW boundary and offsite to east and south), small section of flood zone 2 in SE corner as a result of proximity to Edn Brook, which is also BOA. There is a small area of contamination risk at the west of site (brickworks 1895).															
Potential Mitigations	Development will require sensitive design so as not compromise conservation area objectives, nor listed building settings Hedgerows should be preserved and incorporated within layout as much as possible, and public footpath routes maintained as much as possible. The site offers an opportunity to provide amenity open space (for which the Open Space Study identifies a shortfall in Lingfield). SFRA requires exception test for which a case can be justified given both housing need and extent of flood risk area on site. Opportunities should be sought to enhance access and direct footpath connection to the train station and Lingfield centre. BOA area to south-east offers opportunity for wetland habitat creation alongside SuDS.															
Conclusions	Area of pasture enclosed by hedges and to the rear of residential curtilages and public house. Site is largely contained from the wider landscape and feels like a natural extension to the village. Benefits from close proximity to the village core and is a reasonably sustainable option in light of the housing requirement in the District.															

5.18.10: Policy HSG13 - Land West of Red Lane, Hurst Green.

This is HELAA site 'OXT 021, OXT 048 and OXT 063'. It is proposed for approximately 62 residential units.

Land West of Red Lane, Hurst Green (HEELA OXT 021, 048 and 063)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
	++	0	-	+	-	0	+	0	0	0	0/+	0	-	+	0	0/-
Commentary on Economic Objectives	Oxted has a reasonable employment base for new residents and is a 'tier 1' settlement.															
Commentary on Social Objectives	Fringe site but still reasonable close to services, although pedestrian access is poor. Current lack of footways on Red Lane. Just over 1km from Hurst Green rail station. Primary school and Children's play area both 200m away. Adjacent residential to north is low density and prevailing residential character limits higher density development. This is a fringe site likely to be car dependent without attention to pedestrian accessibility to wider settlement. Vehicular access from east may entail loss of trees, highway management and further speed restrictions.															
Commentary on Environmental Objectives	Greenfield site adjacent rail line. Surface water flooding issues evident to south-east and across site. Stream on eastern boundary. Pond adjacent to northern boundary. Sub-divided by tree line. Significant areas of ancient woodland offsite (within 300m) to south and east, with south connected by intervening woodland. Records of Dormouse in adjacent woodland. SSSI: Staffhurst Wood is located 1km south east of the site. Within 800m of Waste Water Treatment Works.															
Potential Mitigations	Current lack of footways on Red Lane - address pedestrian accessibility to avoid encouraging car dependency. Retain trees, hedges and field boundaries within layout as much as possible. Buffer zones to protect s41 woodland to the south. Dormouse, bat and pond surveys required. Sensitive lighting scheme required alongside linear woodland. Manage adjacent pond for wildlife. SuDS on eastern boundary to address surface water flooding offer scope for multi-functional ecological corridor alongside existing stream/ditch, incorporating wetland habitat. Odour Assessment required, as within 800m of WWTW. Retain Public Rights of Way. Improve pedestrian and cycle access and connectivity, including to train station and local services/facilities.															
Conclusions	Sustainable site in light of housing needs, subject to mitigation issues identified.															

5.18.11: Policy HSG14 - Warren Lane Depot, Hurst Green.

This is HELAA site 'OXT 067'. It is proposed for approximately 50 residential units.

Warren Lane Depot, Hurst Green (HELAA OXT 067)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
	++	?/-	0	+	+	0	0	0	0	0	+	+	?/-	?/--	0/+	0/-
Commentary on Economic Objectives	The site is a Waste & Recycling Depot on the edge of Oxted and it is likely that the facilities on site will need to be relocated. Potential loss of employment and recycling capacity. Oxted has a reasonable employment base for new residents.															
Commentary on Social Objectives	Fringe site but still reasonable accessible to services. Just over 1km from Hurst Green rail station. Primary school less than 400m away and children's play area 200m away. Character of area lends itself to residential, with residential neighbours on three sides.															
Commentary on Environmental Objectives	Close proximity to waster water treatment works raises issues of concern regarding pollution - odour assessment required. Contamination assessment required due to current use. Mature oaks at frontage. Scrub and scattered trees around margins of site, including some mature trees with bat potential.															
Potential Mitigations	Odour assessment required (identified in Water Cycle Study). Contamination assessment Retain mature trees, subject to securing safe vehicular access. Enhance existing habitat corridors at margins of site. Ensure sensitive lighting scheme. Improve pedestrian and cycle access and connectivity, including to train station and local services/facilities.															
Conclusions	Sustainable site, subject to satisfactory resolution of issues identified.															

5.18.12: Policy HSG01- Land at Plough Road and Redehall Road, Smallfield.

This is HELAA site 'SMA 004, SMA008, and SMA040'. It is proposed for approximately 160 residential units.

Land at Plough Road and Redehall Road, Smallfield (HEELA SMA 004, SMA 008, SMA 040).	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport and Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
	++	+	-	+	-	0	+	0	-	0	0/-	0	-	-	0	0/-
Commentary on Economic Objectives	Good proximity to employment areas.															
Commentary on Social Objectives	Good proximity to schools, bus routes and shops within Smallfield (a local centre). Plough Field Playing Field is nearby to the east, which includes a children's play area.															
Commentary on Environmental Objectives	Greenfield, predominantly grade 3 agricultural land quality. Serious surface water flooding evident on northern field. Hedgerows present at field boundaries. Close to Gatwick flight path.															
Potential Mitigations	SuDS to deal with surface water flooding will be necessary. Incorporation of trees and hedges within green infrastructure masterplan, with connectivity of habitats to wider countryside. To promote permeability, avoid car dependency and support the local economy the site should aim to secure a direct pedestrian route to the local centre and schools, via Kings Mead and Bridgham Way. Local junction improvements may improve congestion.															
Conclusions	A sustainable option for residential development, given the housing need, well located to key facilities.															

5.18.13: Policy HSG02 - Chapel Road, Smallfield

This is HELAA site 'SMA 015'. It is proposed for approximately 15 residential units.

Chapel Road, Smallfield (HEELA SMA 015)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport and Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
	+	+	0	+	+	-	-	0	-	0	?/-	0	0	+	0/+	0
Commentary on Economic Objectives	Brownfield site occupied by brickwork and scaffolding contractors as well as an office building (RGT). Also surrounds a further B1 good quality office building on three sides (investment company). Loss of existing employment use, although may improve the environment for adjacent B1 use and redevelopment of the site could be an opportunity for more B1 offices to be incorporated, subject to highways access.															
Commentary on Social Objectives	Possible bad neighbour issues (noise, pollution) from current occupier (brickwork and scaffolding contractors) so change of use may benefit character of the area given proximity of curtilages.															
Commentary on Environmental Objectives	Flood zone 3 (fluvial), although on balance other factors justify exception subject to necessary flood defences, protection mitigation and SuDS . Opportunity to reduce flood risks for surrounding residences. Modified attribution culverted underneath site.															
Potential Mitigations	<p>Need to retain viable shared access for offsite adjacent B1 use.</p> <p>Site requires flood amelioration - Flood defences, protection mitigation and SuDS. Replacement of hard surfacing with permeable solutions including some greenspace may benefit. Scope for green roofs and/or rainwater harvesting.</p> <p>Careful design needed to avoid impact on neighbouring curtilages and amenities.</p> <p>Proposed pedestrian crossing will improve pedestrian access. Local junction improvements may improve congestion.</p> <p>SFRA requires exception test for which a case can be justified given both housing need and other sustainability benefits of this site..</p>															
Conclusions	Subject to satisfactory approach to flood issues, this is a sustainable site with scope to improve the character of the area.															

5.18.14: Policy HSG03 - Land North of Plough Road, Smallfield

This is HELAA site 'SMA 030'. It is proposed for approximately 120 residential units. The SA assessment is based upon the draft policy at the time of writing.

Land north of Plough Road, Smallfield (HEELA SMA 030)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport and Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
	++	+	-	+	-	0	+	0	-	0	0/+	0	-	-	0/-	0
Commentary on Economic Objectives	Adjacent to employment uses.															
Commentary on Social Objectives	On bus route and within reasonable distance of key services at Smallfield local shopping centre. Park and a children's playground opposite. No public access but valued as a visual amenity between the settlement edge and right of way to the east.															
Commentary on Environmental Objectives	Large greenfield fringe site. Improved pasture bordered by heavily managed S41 native hedge with standard trees, mostly oak. Surface water flood risk across most of site, including access points to west and south. Stream to north and ancient woodland adjacent on NW corner.															
Potential Mitigations	Flood mitigation, SuDS required for wider area and for on-site surface water issues. Retain hedges. Buffer hedges and adjacent ancient woodland. Scope for multi-purpose SuDS to provide habitat corridors at boundaries, improving network connectivity. Visually sensitive site so needs to avoid adverse impacts on the setting of the rural landscape to the east - an enhanced ecological network with reinforced boundary treatments would help. Proposed pedestrian crossing will improve pedestrian access.															
Conclusions	On balance this is a sustainable site given the high housing need, subject to mitigations.															

5.18.15: Policy HSG04 - Woodlands Garage, Chapel Road, Smallfield

This is HELAA site 'SMA 039'. It is proposed for approximately 10 residential units. The SA assessment is based upon the draft policy at the time of writing.

Woodlands Garage, Chapel Road, Smallfield (HEELA SMA 039)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
	+	+	0	+	+	0	0/-	0	0	0	?/--	?/-	?/--	-	0/+	0
Commentary on Economic Objectives	Garage and site, so possible loss of some local employment from change of use to residential.															
Commentary on Social Objectives	Residential character neighbourhood with good access to key services.															
Commentary on Environmental Objectives	Flood zone 3 and possible contamination issues (underground storage tanks and garage use)															
Potential Mitigations	Contamination issues will need to be investigated and addressed, with risks exacerbated due to presence in flood zone 3. Flood zone 3 so requires flood amelioration - protection, mitigation and SuDS. Replacement of hard surfacing with permeable solutions including some gardens/greenspace may benefit. Scope for green roofs and/or rainwater harvesting. SFRA requires exception test for which a case can be justified given both housing need and extent of flood risk area on site. Proposed pedestrian crossing will improve pedestrian access.															
Conclusions	This is a sustainable site, subject to mitigation of flood and possible contamination. Change of use offers opportunity to address pre-existing environmental issues. Design and layout will need to be mindful of proximity to curtilages at rear which may limit overall capacity.															

5.18.16: Policy HSG15 - Land West of Limpsfield Road, Warlingham

This is HELAA sites 'WAR 005 and WAR 036'. It is proposed for 190 residential units and an expanded primary school.

Land West of Limpsfield Road, Warlingham (HEELA WAR 005 and WAR 036)	1		2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing		Health	Cultural Heritage	Transport	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
	S/T	O															
	L/T	++	+	0	++	-	0	+	0	0	0/-	0/+	-/-	-/-	0	0/+	0
Commentary on Economic Objectives	Marginal economic benefits in providing more local support for Warlingham centre ins the form of new residents in close proximity.																
Commentary on Social Objectives	<p>In relation to objectives 2 and 4, the site is conveniently located to GP and there is a hospital in nearby Caterham. There is a loss of local open space anticipated, albeit of limited value when not publicly accessible. This is balanced against the considerable District wide benefit that new replacement 3g pitches will bring.</p> <p>Residential development here will be conveniently located for the shops and services of central Warlingham.</p> <p>There is short and long term pressure on primary places in the north of Tandridge in places such as Caterham, Warlingham and Whyteleafe. This site allows for the relocation and expansion of Warlingham Village Primary School to provide an on-site 3FE primary school, which is a further benefit in relation to objective 4.</p> <p>Therefore, although there are some negatives, the overall balance is a positive one in respect of objectives 4 and 2.</p> <p>There will be a long term positive for housing delivery (Obj. 1), although due to the above factors this will not be realised until the longer term.</p>																
Commentary on Environmental Objectives	<p>The site is predominantly greenfield, although there is a pocket of previously developed land (Objective 4).</p> <p>There is surface water flooding across central sections of site, although no flood zones 2 or 3.</p> <p>North half of WAR 005 is former brick works and quarry landfill - potential contamination (Objective 13). Development on greenfield site in groundwater source zone comes with risks in respect of objective 12, particularly in combination with potentially contaminated land. Loss of greenfield in urbanised area may come with negatives in terms of air quality, noise, etc. (Obj. 14) and reduced capacity for climate change adaptation (Obj.10), although the former can be balanced against locating development accessible to services and reducing the need to travel in future.</p> <p>Within impact zone of Riddlesdown SSSI impact zone.</p>																
Potential Mitigations	<p>Main mitigation will be suitable replacement pitch provision, which may include the option of 3g pitches.</p> <p>On site, there is a need for investigation of contamination and potential remediation.</p> <p>SuDS benefitting water treatment will be key at this location within groundwater source zone.</p> <p>Retention of trees and hedges to ensure maintenance of inter-connected ecological networks.</p> <p>Scope to address open space shortfalls of amenity open space and youth provision.</p> <p>Natural England will need to be consulted in relation to SSSI Impact zone.</p> <p>Pedestrian, cycle and highways improvements to address congestion.</p> <p>New school to address pressure on primary places.</p>																
Conclusions	<p>Two distinct half's to WAR 005 together with a central hub. North section is scrub land, which appears to have some on-site surface water flooding issues as well as some more mature trees. Central hub is pavilion buildings and hard-surface sports in a mixed state of repair. South section is pitches, although not publicly accessible.</p> <p>Collectively they form part of a large centrally located, and greenfield area in the heart of Warlingham, some sections of which appear under-utilised (WAR 005 in particular). As a consequence, a potentially central and sustainable area is not being made best use of.</p> <p>Loss of pitches is subject to suitable replacement. As set out in the Playing Pitch Strategy, Sport England and the National Governing Bodies will accept their replacement by modern 3g pitches in the South Godstone garden community. 3g surfaces allow many more hours of play so would not require a like for like replacement in terms of land-take. However, this means that housing delivery of this site would be for the long term, dependent on delivery of replacement pitches in advance of development on these sites.</p>																

5.18.17: Policy HSG16 - Land at Green Hill Lane and Alexandra Avenue, Warlingham

This is HELAA sites 'WAR 011 and WAR 023'. It is proposed for approximately 50 C2 Extra care and C3 residential units.

Land at Green Hill Lane and Alexandra Avenue, Warlingham (HEELA WAR 011 and WAR 023)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
	++	++	-	+	-	0	+	0	0	0	0/+	-	-	0/+	0/+	0/-
Commentary on Economic Objectives	Proposed use (C2 extra care) will provide some local employment.															
Commentary on Social Objectives	About 850m from GP. Adjacent Mill Common and Chesham Common nearby. Although Warlingham is a tier 1 centre with good services, the site is more rural character at this distance from Warlingham centre and slightly further walking distance from services, particularly for older persons. Market housing likely to be relatively car dependent.															
Commentary on Environmental Objectives	Greenfield site within groundwater source zone. War 23 is well screened by trees at boundary, agricultural use, including one or two farm buildings farm buildings.															
Potential Mitigations	Improvements to quality of footpath (surfacing) on north boundary and connections from the site onto it, whilst retaining vegetation and ditch/stream as green corridor. Within groundwater sources zone, SuDS benefitting water treatment required. Pond creation would be an ecological, passive recreation and water treatment asset. Some risk of contamination from agricultural uses on WAR023 (south-east section of site). Retain bridleway at boundary. Retain hedgerows and mature tree specimens, particularly at boundaries. Ecological corridor down west side would connect off-site network north and south, while providing a buffer to local residents. Remove Japanese Knotweed - invasive species.															
Conclusions	Sustainable site subject to above mitigations															

5.18.18: Policy HSG17 - Land at Farleigh Road, Warlingham

This is HELAA site 'WAR 012'. It is proposed for approximately 50 residential units.

Land at Farleigh Road, Warlingham (HEELA WAR 012)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
	++	++	-	++	-	0	+	0	0	0	0/+	-	-	+	0/-	0/-
Commentary on Economic Objectives	Warlingham is Tier 1 centre and this site relates well to the commercial core.															
Commentary on Social Objectives	Healthy option. Located adjacent park with play facilities and less than 300m from GP. Access may lead to congestion on surrounding road network. Off site footpath connectivity to north.															
Commentary on Environmental Objectives	<p>Rough grassland/pasture across northern 3/4 of site, paddocks in smaller southern section abutting residential curtilages. Well contained from wider landscape with trees screening site.</p> <p>40m wide Ancient woodland belt along Eastern boundary.</p> <p>Trees at boundary and some centrally located.</p> <p>Grade 3 agricultural land quality.</p> <p>Central valley running north/south liable to surface water flooding, but no FZ2 or 3 in site.</p> <p>Several contamination sources adjacent and in close proximity.</p>															
Potential Mitigations	<p>Secure pedestrian/cycle access at all sides to maximise permeability of site, as well as connections to the wider area.</p> <p>Within groundwater sources zone, SuDS benefitting water treatment required</p> <p>Contributions to open space shortfalls.</p> <p>Retain hedgerows and mature trees within layout.</p> <p>Retain ancient woodland with suitable buffer/root protection area.</p> <p>Incorporate wetland habitat into site's structural landscape to increase diversity and contribute towards net gain in biodiversity.</p> <p>Retain Public Rights of Way. Alleviate congestion to improve accessibility still further.</p>															
Conclusions	A sustainable site , subject to mitigations identified.															

5.18.19: Policy HSG18 - Former Shelton Sports Ground, Warlingham

This is HELAA site 'WAR 019'. It is proposed for 110 residential units.

Former Shelton Sports Ground, Warlingham (HEELA WAR 019)	1		2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing		Health	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
	S/T	O	+	0	+	-	0	+	0	-/--	0	0/+	-	-	+	0/+	0/-
L/T	++	+	0	+	-	0	+	0	-/--	0	0/+	-	-	+	0/+	0/-	
Commentary on Economic Objectives	Marginal economic benefits in providing more local support for Warlingham centre ins the form of new residents in close proximity.																
Commentary on Social Objectives	<p>Currently under-utilised site.</p> <p>In relation to objectives 2 and 4, the site is conveniently located to GP and there is a hospital in nearby Caterham. There is a loss of local open space anticipated, although policy requires its replacement.</p> <p>Residential development here will be conveniently located for the shops and services of central Warlingham. There is short and long term pressure on primary places in the north of Tandridge in places such as Caterham, Warlingham and Whyteleafe.</p> <p>Therefore, although there are some negatives, the overall balance is a positive one in respect of objectives 4 and 2.</p> <p>There will be a long term positive for housing delivery (Obj. 1), although due to the above factors this will probably not be realised until the longer term.</p>																
Commentary on Environmental Objectives	<p>Areas of contamination risk directly adjacent and in the vicinity.</p> <p>Development on greenfield site in groundwater source zone come with risks in respect of objective 12.</p> <p>Loss of greenfield in urbanised area may come with negatives in terms of air quality, noise, etc. (Obj. 14) and reduced capacity for climate change adaptation (Obj.10).</p> <p>Within impact zone of Riddlesdown SSSI impact zone.</p>																
Potential Mitigations	<p>Main mitigation will be suitable replacement pitch provision.</p> <p>SuDS benefitting water treatment will be key at this location within groundwater source zone.</p> <p>Retention of trees and hedges to ensure maintenance of inter-connected ecological networks.</p> <p>Scope to address open space shortfalls of amenity open space and youth provision.</p> <p>Natural England will need to be consulted in relation to SSSI Impact zone.</p> <p>Retention of Public Rights of Way. Accessibility improvements, particularly for pedestrians and cyclists.</p>																
Conclusions	<p>Secluded and well screened site, despite relatively close proximity to town centre and services. Potentially central and sustainable area for development that is not currently being made best use of being not publicly accessible, or utilised by local sports clubs according to the Playing Pitch Strategy.</p> <p>Loss of pitches is subject to suitable replacement, either locally or within the South Godstone garden community. As set out in the Playing Pitch Strategy, Sport England and the National Governing Bodies will accept their replacement by modern 3g pitches in the South Godstone garden community. 3g surfaces allow many more hours of play so would not require a like for like replacement in terms of land-take.</p> <p>However, this means that housing delivery of this site would be for the long term, dependent on delivery of 3g in advance of development on these sites.</p>																

5.18.20: Policy HSG19 – Edgeworth Close, Warlingham/Whyteleafe.

This is HELAA site 'WAR 016. It is proposed for an estimated 6 units.'

Edgeworth Close, Warlingham (HEELA WAR 016)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
	+	0	0	+	0	0	+	0	0	?/-	+	-	?/-	0	0/-	0/-
Commentary on Economic Objectives	Well located in good proximity to both services and employment opportunities.															
Commentary on Social Objectives	Potential loss of car park, recycling point and amenity land. Loss of parking may increase local congestion (Obj 4), although site is in an accessible area with good services. Loss of recycling point is a negative in respect of objective 9, although site is well located for Household waster recycling centre.															
Commentary on Environmental Objectives	Several trees on steep grassed banks on east of site set within small area of amenity open space - potential loss would be a negative in respect of SA objectives 2 and 10. Within groundwater protection zone. Within impact zone of Riddlesdown SSSI impact zone.															
Potential Mitigations	Trees should ideally be retained within either gardens or amenity land. Replace recycling point elsewhere. SuDS benefitting water treatment (e.g. green roofs, permeable paving) would be beneficial in light of this location within a groundwater source zone. Natural England will need to be consulted in relation to SSSI Impact zone. Highways improvements to benefit congestion.															
Conclusions	Small site with new apartments to NE that are close to the boundary which will restrict layout and housing density further. Loss of trees, amenity open space, recycling point and parking are all negatives. Balanced against housing gain located centrally in a tier 1 settlement.															

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

North Tandridge: One Public Estate (NTOPE)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
	++	?/++	?	?/++	++	?/++	?	?	?/++	?	?/++	?	?	?	0	0
Commentary	<p>The One Public Estate programme covers a number of public sector sites owned and managed by the Local Authority and the NHS. The aim of the programme is to assist public sector landlords to work in partnership to make best use of collective assets. The Programme is at an early stage at the time of writing, but the Local Plan sets out the intentions for the programme to demonstrate commitment to delivery which will have benefits for our communities. Because the programme is at such an early stage, the SA assessment largely consists of uncertainties.</p> <p>The Programme will seek to address a number of issues in the north of the district including demand for all types of housing, particularly affordable housing. Therefore, there is a good prospect of a positive outcome in respect of SA objective 1.</p> <p>The Programme may include facilitating major service transformation such as health and social care integration (Obj. 2) and commercial space (Obj 6). Services provision (Obj. 4) may include new schools, multi-use sports hall and multi-use games area and upgrades to Town End Amenity Space. There will be rationalisation of sites such as the Douglas Brunton Centre and Caterham Dene Hospital. The overall effect in respect of objective 4 seems likely to be positive. The likelihood of facilitating a recycling centre will bring about a positive effect in terms of objective 9. The prospect of a contribution to Caterham Hill Flood Alleviation Scheme may offer positive effects in respect of SA objective 11.</p>															
Potential Mitigations	<p>The areas specified (Caterham and Warlingham) are largely within groundwater source zones. SuDS benefitting water treatment should be employed where possible. In an urban context this may include permeable paving or green roofs.</p> <p>Schemes could also incorporate improvements to community facilities, health facilities, open spaces, recreation facilities, local employment opportunities, recycling facilities, pedestrian/cycle connectivity and safety highways improvements to reduce congestion.</p>															
Conclusions	<p>The Programme is at an early stage, so effects are largely unknown, although seem likely to be positive across a range of SA objectives.</p>															

5.19 SA of Local Plan: 2033 Strategic and Important Employment Sites Policy Options

5.19.1: Policy SES01 - Godstone Road Business Centre, Whyteleafe

Godstone Road Business Centre	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
	0	0	0	+	+	++	++	0	0	0	-/--	--	0	0	0	0
Commentary on Economic Objectives	The policy protects high quality office units, including the Ann Summers Head Office so will be a positive for the local economy.															
Commentary on Social Objectives	The site is accessible via public bus services, and at a walking distance from Whyteleafe South railway station.															
Commentary on Environmental Objectives	Within a groundwater source zone. Compared to other employment allocations, this is a comparatively urban location.															
Potential Mitigations	Any regeneration or enhancement schemes should seek to reduce impacts upon water quality from run-off in this groundwater source zone by installing SuDS prioritising water treatment. Green roofs and permeable paving would be appropriate to the brownfield context. SuDS would also reduce flood risk.															
Conclusions	This is a good sustainable site with considerable economic benefits.															

5.19.2: Policy SES02 - Hobbs Industrial Estate, Felbridge

Hobbs Industrial Estate, Felbridge	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
	0	0	-/--	-	+	++	++	0	0	0	+	0	0	?/--	0	0/-
Commentary on Economic Objectives	A strategic employment site for which regeneration, enhancement and development of high value business is supported by the policy.															
Commentary on Social Objectives	Access to A22, although remote from services .															
Commentary on Environmental Objectives	<p>Within 800m of a Waste-Water Treatment Works - odour assessment required.</p> <p>Within Impact Risk Zone of Hedgecourt SSSI.</p> <p>Contains a pocket of ancient woodland that could be vulnerable to impacts of development, including within root protection areas. The site is screened from the wider landscape by dense trees and shrubbery. Abuts the Eden BOA to the south-east, with good linkages also to SSSI Hedgecourt.</p> <p>Further areas of S.41 priority habitat deciduous woodland are present to the east and south of the site, with a network of ponds and lakes also to the east and south.</p>															
Potential Mitigations	<p>Odour Assessment.</p> <p>Natural England view on mitigations in light of Hedgecourt SSSI should be sought.</p> <p>Could consider removing ancient woodland from defined site boundary to avoid misinterpretation. Redevelopment proposals will need to be mindful of policies affording ancient woodland a suitable buffer.</p> <p>Buffers would also serve to protect the native bluebell recorded. Provide an unlit buffer zone around the sites boundary features, particularly the mature and veteran trees and the areas of ancient/S.41 deciduous woodland, to maintain a dark corridor for commuting and foraging bats.</p> <p>Manage the ancient/S.41 deciduous woodland to restore to a more natural state. Removal of rhododendron would be recommended.</p> <p>Incorporate integral or built-in roosting bricks into the new build to provide long-lasting opportunities for roosting bats.</p> <p>Retain Public Rights of Way.</p>															
Conclusions	Site serves an economic purpose and is a sustainable option for enhancement, subject to mitigations.															

5.19.3: Policy SES03 - Lambs Business Park, South Godstone

Lambs Business Park, South Godstone	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
	0	?/-	-	?	+	++	++	?/++	0	0	0/+	0	0	0	0	0/-
Commentary on Economic Objectives	The site is one of the larger employment locations in the district and the policy supports high value business use, including technological innovation, in line with the Council's Economic Proposition. Regeneration and enhancement of this site could be a major boost to the local economy in close proximity to the new South Godstone garden settlement.															
Commentary on Social Objectives	The site is currently somewhat remote from services and public transport. However, it benefits from a unique offer for local employment sites in the form of the railway siding that has been previously utilised by the site.															
Commentary on Environmental Objectives	The site offers huge scope for renewable and low carbon energy benefits within close proximity (1-2km) of the new Garden Settlement. In order for these benefits to be delivered, the proposed Energy from Waste plant on the west side of the site should be designed to enable use of surplus heat to serve the new community. Benefits could be further maximised by the utilisation of local fuel sources and the option of delivery via the rail sidings. In their Issues and Approaches consultation response, WT Lamb Holdings Ltd noted that <i>Work undertaken by Arup has demonstrated that there is a significant amount of waste arising within Surrey, which currently is either placed within landfill or taken out of County. The development of a large scale biomass waste gasification plant within the District will ensure that waste is not only handled in a more sustainable manner, but also will result in a production of a significant amount of green electricity (15MW); enough to power 21,000 homes..... It benefits from a railway siding that is within the ownership of WT Lamb Holdings Limited, which will be utilised to receive the pre-sorted and bundled RDF and wood waste. This will ensure that all deliveries necessary to fuel the biomass waste to energy gasification plant can be achieved via sustainable modes of transport'</i>															
Potential Mitigations	Provision of heat and power for the new garden settlement from low-carbon and/or renewable sources. Policy could prioritise the utilisation of rail siding for transportation of energy plant fuels (waste, biomass, etc.).															
Conclusions	Notwithstanding the undoubted economic benefits of this site, there is an invaluable opportunity to help deliver an exemplar zero/low carbon sustainable settlement.															

5.19.4: Policy SES04 - Westerham Road Industrial Estate, Tatsfield

Westerham Road Industrial Estate, Tatsfield	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
	0	0	-	-	+	++	++	0	0	0	0	-	0	0	0/-	0
Commentary on Economic Objectives	Currently used for large scale open storage. This is a strategic employment site with scope for regeneration and enhancement for high value business growth.															
Commentary on Social Objectives	Rural location with poor accessibility to services, although links directly to the A25															
Commentary on Environmental Objectives	AONB. Situated within groundwater source zone. Significant areas of ancient woodland in the vicinity, as well as ponds. Greensand Heaths and Commons BOA is 400m to the east.															
Potential Mitigations	Proposals for development/enhancement will need to be mindful of their possible impacts upon the Surrey Hills Area of Outstanding Natural Beauty (AONB). Boundary planting may also offer opportunities for habitat connectivity. Redevelopment offers opportunity to mitigate impacts upon groundwater source zone via SuDS benefitting water treatment. Ponds would have additional ecological benefits, e.g. newt habitat. Access and junction improvements in accordance with the IDP.															
Conclusions	Significant economic potential needs to be balanced with environmental sensitivities on this site.															

5.19.5: Policy IES01 - Snowhill Business Centre, Copthorne

Snowhill Business Centre, Copthorne	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
	0	0	-	-	+	++	++	0	0	0	0/+	0	0	0	0	0
Commentary on Economic Objectives	High quality but small scale business park which provides small scale space suitable for start-ups and SMEs. Limited scope for expansion.															
Commentary on Social Objectives	Semi-residential area, but poorly related to key services and 600 metres from a bus route.															
Commentary on Environmental Objectives	Countryside location but well screened from wider landscape with trees at boundaries. Majority ecological suitable															
Potential Mitigations	Retain existing trees on site.															
Conclusions	Warrants protection as provides invaluable incubation space for the SME and start-up sectors.															

5.19.6: Policy IES02 - Brewer Street, Bletchingley

Brewer Street, Bletchingley	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
	0	0	- / - -	-	+	++	++	0	-	0	+	- -	0	0	0 / -	0 / -
Commentary on Economic Objectives	Provides a range of small scale office and industrial units as well as a specialist veterinary hospital and plasma research.															
Commentary on Social Objectives	Site accessibility is limited, being via Brewer Street which is a residential and country road, which is inappropriate for large scale traffic or HGVs.															
Commentary on Environmental Objectives	Partially within the Brewer Street Conservation Area. Within groundwater source zone. Within Biodiversity Opportunity Area. Majority ecologically suitable, with exception of southern and eastern sections.															
Potential Mitigations	Any intensification should be mindful of conservation area objectives and development will need to be designed sensitively and appropriately. Development should also seek to contribute towards the objectives of the biodiversity Opportunity Area, and address the location within the groundwater source protection zone, via SuDS that mitigate water quality. Area of semi-natural broadleaf woodland) should be retained as it forms a useful wildlife "stepping stone" within the broader landscape.															
Conclusions	A valuable economic site which is suitable for continued use and/or allocation for employment purposes. Some environmental sensitivities, but also scope for improvements. Mitigations, particularly protection of existing on-site broadleaved woodland are important to note.															

5.19.7: Policy IES03 - Cophall Farm, Copthorne

Cophall Farm, Copthorne	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
	0	0	-	-	+	++	++	0	0	0	0	0	0	0	0	0/-
Commentary on Economic Objectives	<p>Important employment site including mechanics, scaffolding and airport parking. Identified as having some scope for intensification. Benefits from close proximity to Gatwick Airport.</p>															
Commentary on Social Objectives	<p>Relatively remote and inaccessible from services.</p>															
Commentary on Environmental Objectives	<p>Countryside site flanked by deciduous woodland and has a pond on site. Almost entirely suitable in ecological survey, bar buffer to deciduous woodland. Overlap with potential SNCI on west side.</p>															
Potential Mitigations	<p>Root protection area buffer to deciduous woodland. Protect pond with 15m buffer - a priority habitat and Great Crested Newt have been recorded in the area. Retain hedges. Retain Public Rights of Way. Several species of bat have been recorded in the area and developments could install bat boxes to support protected species.</p>															
Conclusions	<p>A reasonable option for economic intensification, subject to mitigations. More suited to low key/bad neighbour uses which would be less suited to residential locations.</p>															

5.19.8: Policy IES04 - Systems House, Blindley Heath

Systems House, Blindley Heath	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
	0	0	-	0/-	+	++	++	0	0	0	-	0	0	0	0/+	0
Commentary on Economic Objectives	Mixed employment site on Eastbourne Road (A22) comprising showroom and engineering units.															
Commentary on Social Objectives	Within a settlement boundary, albeit the tier 3 settlement of Blindley Heath. Located on a bus route, and with direct access to A22, but more remote from most day to day services. Residential curtilages in close proximity.															
Commentary on Environmental Objectives	EA Flood zone 2 (fluvial) across full extent of access and road frontage. Trees at south east frontage.															
Potential Mitigations	Suited to B1 uses to limit impacts on neighbouring residential curtilages. Any redevelopment needs to consider fluvial flood risk. Site would benefit from additional hedgerow screening to wider countryside, with benefits of connectivity to wider habitat network. Trees at south-east frontage may warrant protection. Improvements to pedestrian/cycle connectivity.															
Conclusions	A reasonably sustainable employment site.															

5.19.9: Policy IES05 - Redhill Aerodrome Industrial Area, South Nutfield

Redhill Aerodrome Industrial Area, South Nutfield	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
	0	0	0/-	0	+	++	++	0	0	0	0/-	0	0	0/-	0/-	0
Commentary on Economic Objectives	Much of the employment element is primarily taken-up by aviation related industries and services.															
Commentary on Social Objectives	Closest settlement is South Nutfield, with Redhill not far away to the north-west, although site is only really readily accessible by car.															
Commentary on Environmental Objectives	Mole Valley Biodiversity Opportunity Area 150m to east. Ancient woodland adjacent to site west. Great Crested Newts recorded in the vicinity. Pond on site.															
Potential Mitigations	<p>Pond retained, restored and enhanced with additional planting of native aquatic species.</p> <p>A portion of modified-neutral grassland should be retained if possible as this is the area with the most ecological value across the site. Enhance grassland with additional species and maintain regime of occasional cutting to provide habitat for a range of S41 species.</p> <p>Install bat boxes/bricks.</p>															
Conclusions	This is a sustainable employment site, currently catering for a specialist cluster.															

5.19.10: Policy IES06 - Paddock Barn Farm, Godstone Road, Caterham

Paddock Barn Farm, Godstone Road, Caterham	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
	0	0	-	+	+	++	++	0	0	0	+	--	0	0	0/-	0
Commentary on Economic Objectives	Employment site with some scope for industrial or warehouse expansion															
Commentary on Social Objectives	The site benefits from reasonable proximity to both the M25 Junction and Caterham centre, and a bus stop directly adjacent the site.															
Commentary on Environmental Objectives	<p>Within AONB and groundwater source zone.</p> <p>SNCI in close proximity to west. BOA adjacent to west and also nearby in surrounding area to north, east and south.</p> <p>Paddock Wood is designated an area of ancient woodland (within the site area and adjacent to the site in the east).</p> <p>The site is connected to a network of hedgerows and adjacent woodland (Paddock Wood pSNCI) that provide habitat links across the wider landscape.</p> <p>Several species of bat recorded in vicinity to the south (Common pipistrelle, Natterer's bat, whiskered bat and Daubenton's bat).</p> <p>Possible Japanese knotweed presence on site and adjacent to site.</p>															
Potential Mitigations	<p>Avoid loss of woodland habitats, protect canopy and root zones.</p> <p>Opportunity to improve buffering of the north-eastern boundary against neighbouring Paddock Wood SNCI</p> <p>Buildings would benefit from bat boxes.</p> <p>Retain ecological network connectivity. Retain Public Rights of Way.</p> <p>Remove invasive species (Japanese Knotweed).</p> <p>SuDS benefitting water treatment in light of location within groundwater source zone.</p> <p>Design sensitive to AONB setting.</p> <p>Junction improvements in line with IDP.</p>															
Conclusions	Sustainable site subject to mitigations.															

5.19.11: Policy IES07 - Priory Farm, South Nutfield

Priory Farm, South Nutfield	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health	Cultural Heritage	Transport	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
	0	0	-	-	+	++	++	0	0	0	0	0	0	0	0/-	0
Commentary on Economic Objectives	This is classed as an Important Employment Site which provides suitable accommodation for start-ups and includes retail and office uses. However, it is partially hindered by Sandy Lane access which is not suitable for HGVs.															
Commentary on Social Objectives	Located in countryside between South Nutfield and Redhill.															
Commentary on Environmental Objectives	Ancient woodland in close proximity to west, with records of Adder. Potential SNCI nearby to north and larger BOA and SNCI further north still. Likely bat habitats. Many ponds in vicinity.															
Potential Mitigations	Buffer to ancient woodland, protect canopy and root protection area. Provide bat bricks and boxes if redevelopment provides opportunities. Retain trees on site and at frontage															
Conclusions	A sustainable employment allocation on balance.															

5.20 SAs of Potential Gypsy, Traveller and Travelling Showpeople Sites

A Gypsy and Traveller Accommodation Assessment was published in 2017 and found a current and future need of 5 pitches and 21 plots between 2016 and 2033. The Local Plan will take into account the conclusions of the GTAA 2017 and any subsequent updates, among other factors, when setting targets for pitches and plots.

The Council has identified sites for assessment through the HELAA process and is primarily using two sources; sites submitted as part of a call for sites and sites where there is a current planning application for increased provision. The HELAA's approach to traveller sites differs in a couple of respects to that of housing sites (bricks and mortar) in that where sites are not connected to an existing sustainable settlement they are still considered, as it is acknowledged that existing Traveller sites are often in relatively remote locations. Furthermore, if they are sited in an area designated as AONB it has been concluded that it does not automatically restrict development of sites for Traveller uses.

All 13 Gypsy, Traveller and Travelling Showpeople sites from the HELAA were previously subject to SA in 2016. For completeness, they have been updated in table 199 below reflecting updated evidence work on these two subjects subsequent to the last SA assessment.

Table 199: Assessment of Gypsy and Traveller Site Options

ID	Address	SA COMMENTARY, MITIGATIONS & CONCLUSION	Housing	Health	Cultural Heritage	Transport & Services	P. Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
BLINDLEY HEATH																		
BHE 009	Land adjacent to Hartley, Hare Lane	Not a sustainable option. Rejected on Green Belt exceptions test	+	-	-	--	-	0	-	0	-	0	+	0	-	-	0	0
BLETCHINGLEY																		
BLE 009	Land at Travellers Rest	Not a sustainable option. Rejected on Ecology and Green Belt exceptions test	+	-	-	--	-	0	-	0	-	0	+	-	-	-	0	-
BLE 011	Land at Warwick World	Not a sustainable option. Rejected on Green Belt exceptions test	+	-	0	--	-	0	-	0	-	0	+	-	-	-	0	0
BLE 012	Land at Warwick Wold Road	Not a sustainable option. Rejected on Green Belt exceptions test	+	-	0	--	-	0	-	0	-	0	+	-	-	-	0	0
DOMWOOD																		
DOM 011	Forge Farm Nurseries, Stubpond Lane	Not a sustainable option. Rejected on Green Belt exceptions test	+	-	-	-	+	0	-	0	-	0	+	+	+	-	0/+	0
DOM 018	Ivy Hatch, Dowlands Lane	Not a sustainable option. Rejected on Green Belt exceptions test	+	-	0	-	-	0	-	0	-	0	+	0	-	-	0/+	0/-
SMALLFIELD																		
SMA 017	Land at Green Lane, Outwood	Not a sustainable option. Rejected on Ecology and Green Belt exceptions test	+	-	0	--	-	0	+	0	-	0	+	0	-	-	0	-
SMA 018	Burstow Stables, Green Lane, Burstow	Not a sustainable option. Rejected on Green Belt exceptions test	+	-	-	+	-	0	+	0	-	0	+	0	-	-	0/+	0
SMA 032	Hades Wood Farm, Cogmans Lane, Smallfield	Not a sustainable option. Rejected on Green Belt exceptions test	+	-	-	--	-	0	+	0	-	0	+	0	-	-	0	0
SMA 033	The Oaks/ Oak Trees, 2 Oaklands Lane, Shipley Bridge	Not a sustainable option. Rejected on Green Belt exceptions test	+	-	-	+	+	0	0	0	-	0	+	+	+	-	0	0
SMA 034	Land east of Alenho (Kew Garden), Antlands Lane, Shipley Bridge	Not a sustainable option. Rejected on Green Belt exceptions test	++	-	-	+	-	0	+	0	-	0	-	0	-	-	0	0/-
WARLINGHAM																		
WAR 033	Land Adjacent High View, Beech Farm Road	Not a sustainable option. Rejected on Green Belt exceptions test	+	-	0	-	+	0	-	0	+	0	+	-	+	0	0	0
WAR 034	Caravan, High View, Beech Farm Road	Not a sustainable option. Rejected on Green Belt exceptions test	++	+	-	++	-	0	+	0	+	0	+	-	-	+	0	0

5.21 SA of South Godstone Garden Community

5.21.1 SA of South Godstone Garden Community Vision

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Vision: South Godstone Garden Community	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
	++	++	+	+ / ++	0	+	+	? / +	0	0	0	? / +	0	? / +	0	0
Potential Mitigations	The Vision is necessarily short and succinct and more detailed proposals addressing many of the SA objectives are drawn out in further sections.															
Commentary and Conclusions	<p>The Vision focuses to a large extent on certain aspects of the South Godstone Garden Community development, such as infrastructure, finance and delivery, not all of which are relevant to SA. The Vision also prioritises matters of health and well-being of future residents, which relates to well SA objective 2. There is a focus on services for the community (SA Obj. 4).</p> <p>Positive outcomes in relation to other aspects of SA objectives are alluded to by inference, rather than directly. For instance, 'energy efficient' may be interpreted as zero/low carbon methods benefiting climate change, and this matter is drawn out in more detail in subsequent principles and policy. Similarly, sustainable transport is alluded to via mention of rail; cultural heritage is considered via 'sensitive integration'; and references to sustainable, design, innovation can be interpreted as addressing matters in relation to objectives 6, 7, 8, 12 and 14.</p>															

5.21.2 SA of South Godstone Garden Community Principles of Development

The Principles of Development of the South Godstone Garden Community	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Maximises on land value capture to ensure that the development funds and delivers a comprehensive network of infrastructure including services, transport networks and Green and Blue Infrastructure.	0	+	0	++	0	0	0	0	0	0	0	0	0	0	0	+
Engenders community pride by encouraging resident led committees to be set up to partake in the delivery of development. Community stewardship's and ownership of land, assets and facilities will also be important to ensure management and maintenance of key community assets for the long-term.	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Delivers genuinely affordable social and market lifetime homes. Home will be mixed in size, type and tenure and built to ensure they can respond to the changing needs of residents over time (e.g. both for younger families and for the elderly).	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Provides local employment opportunities that are within easy commuting distance of homes and which provide more choice for those who want to work locally, or work more frequently from home.	0	0	0	+	0	++	++	0	0	0	0	0	0	0	0	0
Benefits community health and well-being through the provision of: multi-functional open spaces, opportunities for sport as well as secure and extensive cycle and walking networks.	0	++	0	++	0	0	0	+	+	0	0	0	0	+	0	0
Secures a design and layout that responds sensitively to the surrounding landscape character and countryside. Connectivity across and throughout the site will not only be essential for people, but also wildlife through the achievement of net gains in biodiversity.	0	0	0/+	++	0	0	0	+	0	0	0	0	0	+	++	+
Designs a self-sustaining community which is resilient to changing climates and flooding. The design of the development will ensure homes and other buildings are designed to the highest aesthetic and efficient quality which embraces zero-carbon and energy efficient technologies. Opportunities which encourage food production via allotments and community farms will also be welcomed.	0	0	0	0	0	0	0	++	++	++	++	0/+	+	0	0	0
Locates services, facilities, retail and recreation assets within an easy and reasonable distance from homes and employment. This will be achieved through the delivery and design of integrated and accessible transport systems, with walking, cycling and public transport routes, designed to be attractive forms of transport not just for travel within the Garden Community, but also to and from outlying settlements.	0	++	0	++	0	0	0	+	+	0	0	0	0	+	0	0
Potential Mitigations	Mitigations and improvements have been identified throughout the process of developing the principles.															
Commentary and Conclusions	The principles have an overall positive effect across SA objectives. The preparation of the Area Action Plan will develop and apply these principles to secure the sustainable delivery of South Godstone Garden Community.															

5.21.3 SA of South Godstone Garden Community Strategic Objectives

The Strategic Objectives of the South Godstone Garden Community	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Objective 1: Housing	++	+	0	+	0	0	0	+	0	0	0	0	0	0	0	0
Objective 2: Employment	0	0	0	+	0	++	++	+	0	0	0	0	0	+	0	0
Objective 3: Governance	0	0	+	0	0	0	0	+	0	+	0	0	0	0	0	0
Objective 4: Land Capture and Investment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Objective 5: Sustainable Design, Efficiency and Quality	0	0	0	0	0	0	0	++	++	++	++	++	0	0	0	0
Objective 6: Landscape and Green Infrastructure	0	0	0	+	0	0	0	0	0	0	0	0	0	0	++	++
Objective 7: A Social Community	0	+	0	++	0	0	0	0	0	0	0	0	0	0	0	0
Objective 8: Sustainable Transport and Infrastructure	0	0	0	++	0	+	+	+	0	0	0	0	0	+	0	0
Objective 9: Community Infrastructure	0	+	0	+	0	+	0	0	0	0	0	0	0	0	0	0
Potential Mitigations	Mitigations and improvements have been identified and integrated throughout the process of developing the objectives.															
Commentary and Conclusions	The Garden Sttlement Objectives have an overall positive effect acrosssf SA objectives. The preparation of the Area Action Plan will develop and apply these objectives to secure the sustainable delivery of South Godstone Garden Community.															

5.21.4: Policy SGC01 - South Godstone Garden Community

Policy: South Godstone Garden Community	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Housing	Health & Wellbeing	Cultural Heritage	Transport & Services	P.Developed Land	Economics	Employment	C.Change Mitigation	Natural Resources	C.Change Adaptation	Flood Risk	Water Quality	Contaminated Land and Soils	Air Quality, Noise & Light Pollution	Landscape	Biodiversity
Policy	++	+	-	++	--	++	++	?/++	-	?/++	0	0	-	-	-	+
Alternative Option: No policy	--	-	0/-	-	-	?/-	?/-	?/-	+	?/-	?/-	?/-	0/-	0	-	-
Potential Mitigations	<p>In accordance with TCPA principles, a commitment to an Energy Strategy Masterplan as part of the forthcoming AAP would help increase certainty regarding delivery of benefits in respect of objectives 8 and 10. This could define the carbon-saving and energy generation opportunities and a context-specific assessment of opportunities, constraints, risks, costs and benefits.</p> <p>Godstone train station is identified for high priority improvements in the Infrastructure Delivery Plan (IDP), including a Park & Ride facility/Transport interchange/mobility impaired access to both platforms, ticket hall, toilets and enhanced rail services. The IDP also identifies a potential internal spine road to minimise congestion.</p> <p>Further education, health, recreation, community facilities and utilities as identified in IDP, could also have mitigating roles.</p> <p>The identification of a large strategic scale area of green infrastructure could mitigate recreational and ecological impacts and contribute towards a net biodiversity gain. Proposals should seek to enhance heritage assets and their setting as well as recognise their importance within the layout of development. Further investigation within the AAP should investigate and identify specific opportunities to enhance the heritage assets, for example via setting within green infrastructure, so as to make a positive contribution to, or better reveal, their significance.</p> <p>Identification of a household waste recycling site may help in respect of objective 8, although the settlement may not be of sufficient scale to justify it. Either way that is a matter for the Waste Authority.</p>															
Commentary and Conclusions	<p>The South Godstone Garden Community and location, as well as the principles of having a Garden Community at all, have already been subject to considerable assessment elsewhere in this SA and also in previous iterations. Therefore, as well as previous SAs, cross-reference should be made to the following within this document 5.8 'Delivery Strategy Approaches', 5.13 'SA of Garden Settlement Location', 5.14 'SA of Further Options for Garden Settlement'. This section assesses the Local Plan policy, as opposed to the principles, or location of the garden community .</p> <p>The alternative locations for a garden community have already been assessed. Therefore the alternative 'No policy' can be assumed to represent a scenario where the Local Plan did not have a Garden Community policy, at South Godstone or anywhere else. Such an option has in effect also already been tested as part of the evolution of the SA of the delivery strategy approaches (Section 5.8). Nonetheless, for completeness it is included here alongside the policy itself.</p> <p>Clearly the 'No policy' option would have a significant negative effect on objective 1., since the garden community accounts for the bulk of the Local Plan housing number. Clearly there would be development pressure at alternative sites, but given the District's environmental constraints, it seems unlikely that the same scale of development could be delivered on piecemeal sites elsewhere in the District. Similarly, the garden community offers the opportunity to deliver large scale strategic green and recreational infrastructure (including a 100ha strategic area of GI , and three 3g pitches), as well as anew GP surgery, that would be difficult to be deliver alongside or within much smaller developments. Therefore the emerging policy is better in respect of objective 2.</p> <p>Given the District is of rural character containing settlements that have grown in scale gradually over long periods of time, the rapid introduction of comparatively large new settlement is arguably at odds with the cultural heritage (objective 3). In addition the policy site does contain a central ancient monument in close proximity to the train station. Piecemeal growth across the District still comes with challenges in respect of objective 3, though arguably to a lesser extent.South Godstone does offer an opportunity to locate significant numbers of persons in close proximity to a train station, as well as new employment (Objs. 4, 6 and 7).</p> <p>It seems difficult to envisage that not having a policy could achieve a similar positive effect, notwithstanding likely scales of growth.</p> <p>Clearly the policy site requires significant area of greenfield (Obj 5), though alternative sites elsewhere, if they could be found, would almost certainly be overwhelmingly be greenfield as well. Similarly, South Godstone is mostly grade 3 agricultural land, but it has this in common with the wider District (objective 13).</p> <p>The South Godstone policy has more positive aspects in respect of climate change (Objs 8 and 9) in several respects. The commitment, agreed by the Council, to build a community that accords with TCPA Garden City principles, including a commitment to Prioritising zero-carbon and renewable energy. South Godstone also has a site specific opportunity to help facilitate this on nearby Lambs site, which is an allocation in the Waste Local Plan.</p> <p>South Godstone is comparatively preferable in terms of flood risk (obj 11) and water quality risks (obj 12) compared to the wider District, particularly the large areas of the more densely populated north (Caterham, Warlingham and Whyteleafe) that are within groundwater source zones.</p> <p>Some landscape impact (Obj 15) seems inevitable with the scale of development required, and the no policy option would lead to development pressure on site that have already fared poorly in landscape assessment work.</p> <p>The prospect of a 100ha area of strategic GI offers some genuine scope for biodiversity gain, particular if focused on priority habitats (Obj 16).</p>															



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