



# Report to Tandridge District Council

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Planning and Compulsory Purchase Act 2004  
Section 20

## REPORT ON THE EXAMINATION INTO THE CORE STRATEGY DEVELOPMENT PLAN DOCUMENT

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## Abbreviations used in this Report

¶	paragraph
2004 Act	Planning and Compulsory Purchase Act 2004
AONB	Area of Outstanding Natural Beauty
AMR	Annual Monitoring Report
CD	Core Document
CS	Core Strategy
DPD	Development Plan Document
GB	Green Belt
HCS	Housing Capacity Study
HNS	Housing Needs Survey
LDF	Local Development Framework
LDS	Local Development Scheme
PDL	Previously-developed land
PPG	Planning Policy Guidance Note: <i>2 – Green Belts</i> <i>8 – Telecommunications, 2001</i> <i>15 – Planning and the Historic Environment</i> <i>16 – Archaeology and Planning</i> <i>17 – Sport and Recreation, 1991</i>
PPS	Planning Policy Statement: <i>1 – Delivering Sustainable Development, 2005</i> <i>3 – Housing, 2006</i> <i>6 – Planning for Town Centres, 2005</i> <i>7 – Sustainable Development in Rural Areas, 2004</i> <i>12 – Local Development Frameworks, 2004</i>
Regulations	Town and Country Planning (Local Development) (England) Regulations 2004
RSS	Regional Spatial Strategy
SAC	Special Area of Conservation
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SEP	South East Plan
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SoS	Secretary of State
SP	Surrey Structure Plan
SPD	Supplementary Planning Document

## 1. Introduction

- 1.1 Under the terms of section 20(5) of the Planning and Compulsory Purchase Act 2004 (the 2004 Act), the purpose of the independent examination of a development plan document (DPD) falls into two parts. This is to determine, firstly, whether it satisfies the requirements of section 19 and section 24(1) of the 2004 Act, the regulations under section 17(7), and any regulations relating to section 36 concerning the preparation of the document; and, secondly, whether it is sound.
- 1.2 My Report firstly deals with the statutory requirements under section 20 of the 2004 Act, including the procedural tests of soundness. The Report goes on to consider the soundness tests of conformity, coherence, consistency and effectiveness. These are dealt with firstly on a general basis, and then specific issues or policies are examined. I conclude with the topic of monitoring and any remaining outstanding matters.
- 1.3 This is a simple and uncomplicated Core Strategy (CS). At its heart lies a straightforward strategic, long term vision for the District from which the policies flow: the environment of the built up and rural areas is to be protected; the very low housing target (the second lowest) set out in the Regional Spatial Strategy (the RSS), namely the draft South East Plan (the SEP), is to be met; there is no need for any additional employment or retail development; there is no need for additional recreational or community facilities; and there are no significant infrastructure constraints. I consider this vision to be well founded and locally distinctive, and to be "place-shaping" and spatial. Those who wished for something more radical, out of the ordinary, or ground breaking have missed the point of local spatial planning based on community involvement.
- 1.4 It is unfortunate, therefore, that this simplicity was not reflected in the CS itself, which obscured these uncomplicated aims and objectives, partly because it was far too long. Too often policies did not say what the Council told me during the Examination they were meant to say. Unnecessary criteria or policies were added that would have been better placed in the Development Control DPD. Explanatory text was too long as it tried to encompass all eventualities and to include all interest groups' viewpoints. And there were some omissions in the evidence base.
- 1.5 There were no fundamental failures of soundness in the CS, but a seemingly large number of changes are required to make it sound. I am very aware of the danger that there could be so many changes that the CS is found unsound because cumulatively they result in a completely different DPD. However, I do not consider this to be the case because the key changes are not many, being those required to bring the policies back to the strategic vision, objectives and evidence base of the CS.
- 1.6 Some changes are only rearrangements of the existing text to bring explanations (primarily in appendices) closer to (or into) the relevant policies, or to group housing policies together. There are a number of additional explanations for clarity and coherence. Some policies have been shortened or deleted because they duplicate national policy and so their loss would not harm the CS's aims. And, lastly, some policies have been altered so that further work on the details of their operation (not their principle) can be examined in later DPDs. So whilst these together might create the impression of many changes they do not, in fact, result in a cumulative failure of soundness because they are either textual rearrangements, or clearer explanations, or deletions of duplicate material, or reference of non-essential detail to later DPDs.
- 1.7 I am satisfied that the changes I have specified in this binding report are made only where there is a clear need to amend the CS in the light of the soundness tests. None of these changes materially alter the substance and overall strategy of the submitted CS, or undermine the sustainability appraisal and participatory processes already

undertaken. I have not shortened the over-long explanatory text because that is not my task (see ¶ 1.15), but I hope that the Council will substantially reduce it when the CS is reviewed.

1.8 The CS should not be used as a model or template for future DPDs by this or any other Council. This is primarily due to its lack of clarity as set out in ¶ 1.4 above, and the problems of soundness that have flowed from this.

### **My Overall Conclusion**

1.9 Subject to the DPD being changed in accordance with my Annex A: Schedule of Changes, I find the CS sound.

1.10 In summary, the **key changes** I recommend are:

- Clearer visual signposting of sections and explanatory text.
- General clarification and simplification of policies to reflect more accurately the strategic vision, bringing explanatory information from the Annexes into the policy and/or text.
- Placing the "Social Progress" section immediately after the "Part 2 Vision and Strategy" section (including CSP 1) so as to group housing policies.
- To clarify in CSP 1 (Housing) how the policy will operate, deleting references to windfalls, cross-referencing to CSP 12 (where windfall references are also deleted), and referring to the Site Allocations DPD which settlements are to be included as Green Belt Settlements.
- Changing CSP 2 from "requiring" some aspects of sustainable construction to "encouraging" them.
- Merging aspects of CSP 3 into CSP 4 (design) and clarifying which criteria are "required" and which are only "encouragements".
- A more strategic and locally distinctive replacement of CSP 6 (Biodiversity).
- A simpler, more strategic version of CSP 11 (Landscape).
- Replacement of CSP 14 with an interim holding policy containing reduced percentages and thresholds for affordable housing based on current Development Plan policies and proven past practice.
- Referring to a Site Allocations DPD the settlements to which CSP 16 (Rural Allocations) will apply.
- A new Extra Care Housing policy.
- Altering CSP 22 (Community Services and Recreation) to comply with national policy, and a definition of these services in the Glossary.
- Altering and simplifying CSP 24 (Town Centres) to accord with national policy, setting out the hierarchy of centres, and mentioning two key redevelopment sites in Caterham and Oxted.
- Consequential monitoring and saved Local Plan policy changes.

Total deletions of policies:

- CSP 3 (Environment).

- CSP 9 (Heritage).
- CSP 25 (Rural Strategy).

### **Superseded Local Plan policies**

1.11 Regulation 13(5) of the Town and Country Planning (Local Development) (England) Regulations 2004 requires that where a DPD is intended to replace an old policy, it must state that fact and identify the old policy it is to replace. This requirement is met by Appendix 7 of the CS, and I have recommended updating changes to it in Annex A of this Report in order to reflect other recommended changes to the CS.

### **Background to the Report**

1.12 After the Exploratory Meeting on 3 April 2008 I said that my main areas of concern were housing windfalls and supply, development management policies, and monitoring. During the course of my Examination additional areas of concern were identified, namely the evidence base for the affordable housing and Green Belt (GB) Settlement housing policies. I deal with all these in my Report.

1.13 On 27 June 2008 amendments to the 2004 Regulations came into force, but they provide that my Examination should continue under the original 2004 Regulations as the CS was submitted before the 27 June amendment. On 4 June 2008 the Government published a new Planning Policy Statement 12 (PPS12), but since this DPD was submitted in the context of the earlier PPS12 and Regulations, I have assessed it against the nine soundness tests in the previous PPS12. In addition, asking respondents in the middle of the Examination to recast their representations would have unnecessarily confused them and disrupted the Examination programme when the tests are essentially the same in both PPS12 versions.

1.14 Since the CS was submitted and the hearing sessions were completed, the Secretary of State (SoS) on 17 July 2008 put forward Proposed Changes to the Draft RSS for the South East – the SEP. These clearly could not have been taken into account in the preparation of the CS. However, there was very little alteration to the recommendations contained in the Panel Report on the SEP, which the CS did take into consideration. In particular, the housing numbers requirement, GB boundaries and affordable housing target were unchanged. I gave the Council and all the respondents the opportunity to submit further written representations on the Proposed Changes, which I have considered.

### **My Approach**

1.15 In line with national policy, the starting point for the examination is the assumption that the Council has submitted what it considers to be a sound plan. I have had regard to the issues raised in all the representations duly made both on the CS following its submission to the SoS and on the alternative sites advertised by the Council in April 2008. It is not a requirement of the 2004 Act that I consider or report on "objections", and consequently my report does not list individual representations or respond to all the points made. I have concentrated on the issues that go to the heart of whether this DPD is sound or not. My task is not to make the CS "more sound".

1.16 My Report refers to all the changes that are needed to make the CS sound, and the detailed wording is set out in my Annex A: Schedule of Changes, which also includes a number of changes put forward by the Council. Some of the Council's suggested changes are of a minor typographical, grammatical or factual nature. Nevertheless, I recommend them because cumulatively they improve the clarity of the CS and so its soundness. They were either discussed at the hearing sessions, or were sent to the participants for comments, and/or were published on the Council's web site. My recommendations take account of the explanatory text, where necessary.

1.17 Whilst I have attempted to identify as many resulting amendments as possible that may follow from my recommendations, issues of consistency may still arise. In the event of any doubt, I am content for such matters, plus any minor spelling or grammatical matters, to be amended by the Council so long as the underlying meaning of the CS is not altered.

## 2. Procedural tests

### *Test 1 – Consistency with the Local Development Scheme (LDS)*

2.1 The CS DPD is properly identified in the Council's approved LDS (CDTD5). It has been prepared in accordance with the profile and timetable set out in the LDS. Therefore, I conclude that this Test is satisfied.

### *Test 2 – Compliance with the Statement of Community Involvement (SCI)*

2.2 The Council has complied with the consultation procedures set out in its adopted SCI (CDTD6). It is evident from the documents submitted by the Council, including the Regulation 28 and 31 Statements and its Self Assessment "toolkit", that the Council has met the other Regulation requirements.

2.3 There was an element of dissatisfaction with the public consultation process at the Exploratory Meeting and Pre-Examination Meeting. But I am satisfied that the production of the CS has resulted in wide-ranging community involvement and engagement. This has been achieved using a variety of consultation tools and methods including the Council's magazine; the Local Strategic Partnership; a Citizen's Panel; the internet; workshops; presentations to most parish councils; information in libraries; questionnaires to a sample of households and businesses; consultation with landowners, developers and consultants; and press releases to local news media.

2.4 All this has led to a broad range of people and interests becoming involved. But no process of public consultation can reach everyone and inevitably some people still did not become aware of the CS until relatively late on. In particular, local people understandably became concerned when a number of developers put forward specific sites for development which, under the 2004 Regulations, the Council was obliged to advertise. I deal with these sites later in my Report where it will be seen that I have not recommended any to be allocated. Overall, I consider that the Council is to be praised and commended for the considerable effort it put into the public consultation process. I conclude that Test 2 is met.

### *Test 3 – Sustainability Appraisal (SA)*

2.5 Alongside the preparation of the CS it is apparent that the Council has carried out a parallel process of SA at all stages. I am satisfied that the process, baseline information used, alternatives assessed, and the outcomes are properly identified so that the CS complies with the requirement of section 19(5) of the 2004 Act.

2.6 There are no "Natura 2000" sites within the area covered by the CS, although there are some close to the District boundary. So the Council has carried out an "Appropriate Assessment" under Article 6 (3) of Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive). This concludes that the CS, alone or in combination, is unlikely to have a significant impact on the Ashdown Forest Special Area of Conservation (SAC) (habitats) and Special Protection Area (birds) or the Mole Gap to Reigate Escarpment SAC. Therefore no further assessment is necessary as both sites have been "screened out", and this has been agreed with Natural England. Thus, I consider that the CS meets Test 3.

### 3. Overview of other tests

#### *Test 4a – A Spatial Plan, with regard to other relevant plans, policies and strategies*

3.1 There is no evidence to suggest that the relevant plans, policies and strategies of other stakeholders have not been properly coordinated. The policies are organised around the spatial objectives and vision of the CS and flow from them. In broad terms, I am satisfied that the DPD reflects national policy on spatial planning. There are expectations in the Structure Plan (SP) to include various issues in development plans, but they were written before the new Local Development Framework (LDF) system and so they are not relevant to this DPD. I am satisfied that Test 4a is met.

#### *Test 4b – Consistent with national planning policy*

3.2 The comprehensive assessment of the CS against relevant aspects of national policy in the SA demonstrates that its overall strategy and policies are well-aligned with the principles and objectives of current national planning policy. The CS contains some duplication of national policies, some of which do not seem to explain or add further local detail. I appreciate that the Council has taken this pragmatic approach as a means of ensuring that the CS reads easily and is understood by those likely to use it. I share that aim. But a core strategy should not repeat or reformulate national policy.

3.3 In reconciling and balancing these different requirements I too have taken a pragmatic approach as I have examined each CS policy. With the changes I recommend, I find the DPD consistent with national policy, satisfying this Test.

#### *Test 4c – General Conformity with the Regional Spatial Strategy*

3.4 By letter dated 14 February 2008, the South East England Regional Assembly confirmed the CS's then general conformity with the adopted RSS (Regional Planning Guidance 9 and Alterations) and also the emerging RSS, the draft SEP as submitted to the Secretary of State on 31 March 2006. ¶ 5.2 of the CS is confusing in setting a number of time periods, one of which does not match that for the SEP. So I agree with the Council's suggested change to make the CS sound by deleting the paragraph, and inserting a more reasoned explanation into the Introduction of the length of time that some of the CS's policies are meant to cover.

3.5 As I have mentioned, the SoS's Proposed Changes to the draft SEP were published on 17 July 2008. However, I have taken into account the implications of these Proposed Changes for the submitted CS and the views of the Council and the other respondents in coming to my conclusions on its soundness. With these changes, I therefore consider Test 4c is met.

#### *Test 5 – Regard to the Community Strategy*

3.6 There are no convincing reasons to doubt that proper regard has not been paid to the Council's Community Strategy. I believe Test 5 is satisfied.

#### *Test 6 – Coherence and consistency within and between DPDs*

3.7 Since this is the first DPD to be prepared by the Council, consistency and coherence between it and subsequent DPDs can only be tested when other DPDs are prepared. I am not aware of any inconsistencies or conflict with DPDs adopted by neighbouring Councils. The CS reflects the Council's corporate vision in identifying the key spatial objectives of protecting the environment, providing for the social needs of its communities, and providing a sustainable economy. The policies in the CS are focused on these objectives and there are no obvious gaps in coverage.

3.8 Some respondents found the CS to have a confusing structure, with development management (control) policies mixed in with strategic vision policies in a seemingly haphazard manner. There is, in fact, an underlying logical structure focussed on the spatial objectives I have set out above, although it is somewhat lost in the poor typographical design and the confusing mixture of the explanatory text and policies.

3.9 In response to these criticisms the Council tentatively suggested rearranging the policies into Core (strategic) Policies and Development Management (Control) Policies. But I am not convinced that this would bring about a coherent, logical structure, particularly as I have doubts about the suggested placement of many of the policies within the two proposed sections.

3.10 Instead, I agree with the Council that it should adhere to its original structure with some minor changes. These are, firstly, to ensure that explanatory text is clearly placed next to the policy or policies it relates to, and that there are obvious title pages to each of the sections that are identified in black print on the contents page of the CS. Moreover, the reduction in the number and bulk of some of the proposed policies that I recommend later in my Report will also help to produce a more readily apparent logical structure to the CS.

3.11 And, secondly, I recommend two other changes: to place the "Social Progress" section immediately after the "Part 2 Vision and Strategy" section; and to place policy CSP 1 and its explanatory text (¶ 5.3 onwards) within and at the beginning of the "Social Progress" section, thereby changing CSP 12 to CSP 2. This would more logically group the main development and housing policies together at the beginning of the CS's policy section. For consistency, I consequently recommend that the box on "Social Progress" should be placed before the box on "Environmental Protection" in ¶ 5.1 of the CS. Part 5 of the CS would then be solely about "Spatial Objectives".

3.12 I conclude that the CS with the changes recommended would be internally coherent and consistent, and so would meet this Test.

*Test 7 – Appropriate strategies and policies*

3.13 I am satisfied that a range of reasonable options and alternatives were considered and tested. I have assessed local distinctiveness in each individual policy and am satisfied with them as recommended to be changed, but these will need to be carefully considered again when the CS is reviewed. I have a similar view about the evidence base, although I have recommended changes where I have doubts about its specific credibility e.g. on affordable housing. With these provisos, I consider this Test is met.

*Test 8 – Implementation and monitoring*

3.14 The Council amended the "Indicators, Targets and Delivery" Annex 2 in order to improve the policy indicators/targets and links, and this was publicised before and during the hearing sessions. The changes are an explanation or elaboration of existing material and so are not significant changes. I deal with the Annex later in my Report but, in essence, I am satisfied that the mechanisms are robust and focussed on achieving spatial outcomes, thereby satisfying this Test.

*Test 9 – Flexibility*

3.15 I consider that the CS is flexible enough to respond to changing circumstances. I therefore conclude that the CS meets this Test.

#### **4. Key Issues for the Policies**

4.1 My detailed issues below for the CS primarily relate to the following tests: Test 4 (consistency with national and regional policy), Test 6 (coherence and consistency within the DPD), Test 7 (appropriateness and the evidence base); and Test 9 (flexibility).

#### **5. Whether the vision, spatial objectives and spatial strategy are clear, appropriate, and provide a sound basis for the policies**

5.1 The vision, spatial objectives and spatial strategy have been appropriately shaped by the context and circumstances of the District. Some respondents were critical of what was perceived as a passive and generic identification of vision and objectives, but I am convinced by the evidence that they are a good reflection of the locally distinct situation found in the District that will shape its foreseeable future.

5.2 Tandridge is not an area of great change with major development allocations to be accommodated. There are a limited number of key challenges and opportunities because Tandridge is the sixth smallest District in South East England in population terms (2001 Census) and as a result has one of the smallest urban areas. It has the second lowest housing allocation in the SEP. There is no identified need for other significant development (e.g. retail and commercial). Over 90% of the District is GB with large Areas of Outstanding Natural Beauty (AONBs).

5.3 The CS identifies key challenges such as high house prices, the affordability gap, an ageing population and a risk of labour shortage, as well as landscape protection. It then sets out 10 ranked main issues facing the District, from which the objectives flow. The issues reflect the desire of the local community to continue to live and work in what is an attractive, healthy and safe area. In this respect they are locally distinctive and appropriate.

5.4 I agree with the Council that a change is required to issue 3 in order to clarify that adequate infrastructure should accompany any development, not just housing.

5.5 The objectives flow from the identified issues and have been grouped under three sustainable development themes: Environmental Protection, Social Progress and Sustainable Economy. As I have previously commented, the policies in the CS are then grouped under these themed objectives, and the policies clearly reflect the objectives. With some minor changes, I consider this to be logical and appropriate.

5.6 Overall I find that the vision, spatial objectives and spatial strategy are well-founded in identified community needs and reflect the distinctive characteristics of the District and community priorities in the Community Strategy. With the recommended changes, I am satisfied that they are soundly based, appropriate for this District, and reflect local issues and priorities.

#### **6. Whether the development location and housing policies are appropriate and clear, are supported by a robust and credible evidence base, and reflect national and regional policy**

##### **Level of housing provision**

6.1 Policy CSP 12 says that provision will be made for a net increase of at least 2,500 dwellings between 2006 and 2026. This figure has been taken from the draft SEP

Proposed Changes requirement. The words "at least" will provide flexibility by ensuring that RSS requirements are seen as a "floor" and not a "ceiling" in specified circumstances. I consider this to be sound.

6.2 I appreciate that the SEP's requirements are not certain, but ¶ 53 of PPS3 says that policies and strategies should have regard to the level of housing provision in the emerging RSS, which CSP 12 does. Even if the overall SEP housing requirement is increased, the District's allocation may not be altered, as the SoS has already indicated in her Proposed Changes.

### **Sources of provision**

6.3 Government advice is that a DPD should identify broad locations and specific housing sites that will enable continuous delivery for at least 15 years from the date of its adoption. Specific deliverable sites should be identified for the first five years. For the next five years (years 6–10) a further supply of specific developable sites should be identified. And for the last five years (years 11–15) if it is not possible to identify specific sites then broad locations for future growth should be indicated. This advice is primarily set out in ¶s 53 to 56 of PPS3.

6.4 The Council has not carried out a Strategic Housing Land Availability Assessment (SHLAA), but this is not in itself fatal because ¶ 54 of PPS3 says that it can draw on other relevant information. The question is: how credible is that information?

#### *The first five year period (years 1–5)*

6.5 For the first five years the Council has carried out an assessment based on Government advice on how to demonstrate a 5 year supply of deliverable sites, which has been endorsed by the Planning Advisory Service as the correct methodology to use in the absence of a SHLAA. The Council updated this during the hearing sessions to show the first five years of 1<sup>st</sup> April 2008 to 31<sup>st</sup> March 2013, based on the latest monitoring as at 31<sup>st</sup> March 2008. This showed a total of 1022 dwellings as compared to a SEP five year housing requirement of 625 dwellings ( $2,500 \div 20 \text{ years} = 125 \times 5 \text{ years} = 625$ ). Thus there would be some 397 dwellings provided above the SEP requirement.

6.6 Various respondents criticised the Council's figures – but all of the criticisms were on relatively minor matters, none of which would have significantly affected the predicted outcome of a large number of dwellings being provided on deliverable sites over the first five years. Indeed, none of the respondents at the hearing sessions challenged the Council's basic conclusion that there would be sufficient deliverable sites in the first five years. I agree with that conclusion.

#### *The second five year period (years 6–10)*

6.7 For the second five year period, the Council produced a Housing Capacity Study (HCS) which it accepted was not as detailed or as rigorous as a SHLAA. However, the HCS covered urban, rural and brownfield sites within the GB as required in a SHLAA, and it was produced in conjunction with developers. The HCS contains windfall rates, but the Council excluded these from its calculations submitted to the Examination. Although, the updated 2007 version of the HCS was not produced in collaboration with developers, the Council provided me during the hearing sessions with a further updated list of sites (an updated Annex A from its Position Paper 1) taking into account some (though not all) developer comments on the sites.

6.8 But there are three problems with this updated Annex A. The first is the concerns expressed by some developers that some sites should not be included in it. The second is whether around four of the sites have "reasonable prospects" in PPS3 ¶ 56 terms of them being considered developable. And the third is whether sites in the

CSP 1 defined Green Belt Settlements should be included due to sustainability concerns.

6.9 Dealing with the last point first, I have recommended for reasons that I explain later that the defined Green Belt Settlements should be excluded from CSP 1. This means that two sites at Blindley Heath and Felbridge should be excluded from the updated Annex A.

6.10 On the "reasonable prospect" point, I agree with the Council that whilst a site's suitability and achievability can be ascertained from site surveys and other assessments, the reasonable prospect of its availability is much more difficult to assess where there is no hindrance to its developability (as here) other than the landowners' intentions. This is because landowners' intentions beyond the short-term (i.e. the first five years) are often unknown, even to themselves. In addition, the very identification of a site for development can trigger landowner or developer action, thus creating a 'self-fulfilling prophecy'. Therefore, if a landowner has not said categorically that they have no intention of selling their site or that it should not be included for other reasons, then I believe it has a reasonable prospect of being available in the second or third of the five year PPS3 periods. I was told that none of the sites in the updated Annex A have been so excluded by their landowners.

6.11 Apart from the two excluded Green Belt Settlement sites, I also have some doubts about the inclusion of Chartres Towers, Felcourt Road (50 units) as it lies in the GB. It may well be acceptable, but I cannot properly judge that on the information presently available, so it would be safer for me to exclude it. Otherwise, I am satisfied that the Council has accurately assessed that the remaining sites are developable in PPS3 terms, despite the adverse comments made by some respondents. This means that the updated Annex A table identifies some 495 dwellings. In addition, I agree with the Council that as the HCS did not identify sites below 0.4 hectares then it probably underestimates the potential of the urban (built up) areas. As an example the Council cited two further sites in that category which have recently come forward and which would add another 24 dwellings, giving a total of 519 dwellings.

6.12 So the total number of dwellings identified in the updated HCS would be some 106 dwellings less than the 625 required by the SEP in this second five year period. But I need to weigh that shortfall against two factors – one is the underestimation of housing potential in the HCS that I mentioned in my last paragraph. And the second is the Council's contention that a surplus of housing from years 1-5 should carry over to reduce the requirement in years 6-10. The Council argues that after two years of known completions during the SEP period (2006-2008) of 718 dwellings and a predicted 1022 dwellings at the end of the first five year period, that there will be a total surplus over requirement of some 527 dwellings at that end point.

6.13 Various respondents pointed out Government policy that RSS targets should be regarded as a "floor" and not a "ceiling". The draft SEP says that housing requirement figures are a minimum. Councils can exceed RSS targets if they wish to, but they should take account of sustainability and other considerations in a planned manner. This is indicated in the supporting text to policy H2 of the SEP (Councils "*are encouraged to test higher levels of provisions for housing through their Local Development Documents*") and in Baroness Morgan of Drefelin's statement in the House of Lords on 4 December 2007. In addition, PPS3 requires Council's to manage housing delivery (¶s 62 to 67), and Councils can indicate what range of housing delivery is acceptable. So, in summary, a RSS target is not a "ceiling" limit; and going above a RSS target is encouraged, but it should be planned and not haphazard.

6.14 The Council says that it wishes to manage this surplus through the CS due to a number of unique local reasons. One is because the area is recognised in the SEP as having significant environmental and policy constraints, such as Green Belt (94% of

the District) and AONBs. If the surplus is not counted towards the SEP target then virgin Green Belt land might need to be released. Secondly, the allocation in the SEP is based on the fact that existing levels of infrastructure provision will be able to cope with the number of dwellings proposed. Building at higher rates brings a high risk that infrastructure and services would not be able to cope. The third reason is that the annual average in the SEP for the entire period of 125 dwellings is one of the lowest requirements in Surrey, so there should be management of supply to ensure a reasonably close adherence to this level as that target has been set due to the previous two limiting factors.

6.15 I find these to be persuasive arguments for some carry over of the surplus above the SEP target in the first five year PPS3 period into the second five year period. I can see that the amount of surplus could be substantial and could be more than sufficient to make up for the shortfall in the second of the PPS3 five year periods shown in the updated Annex A, even if a larger shortfall results due to some of its listed sites not coming forward.

6.16 But I do not think it is necessary for me to come to a view as to the exact amount of the carry over that would be permissible. I do not agree with the Council that the average yearly rates (125 dwellings) in the SEP should be so precisely reduced by any estimated surplus to exactly reach the SEP requirements. I say this for three reasons: firstly, the SEP target is a floor and not an absolute ceiling which restrains housing numbers (see above); secondly, the analysis and mathematics in the CS are not sufficiently precise, particularly given the absence of a SHLAA to be certain of the exact amount of any surplus, and given the slow down in the current housing market; and, lastly, the Annual Monitoring Report (AMR) is the proper mechanism to assess whether any corrective action needs to be taken, perhaps through a review of the CS. For similar reasons, I do not agree with the Council that any estimated surplus should be carried over into the third and last of the PPS3 five year periods – it is too uncertain.

6.17 CSP 1 and CSP 12 (and their explanatory text) give the CS sufficient flexibility to increase housing supply, if necessary, by providing for the AMR assessment, the identification of reserve sites in the Site Allocations DPD, and the possibility of GB allocations in that same DPD. If a large excess of housing becomes apparent in the AMR, then that might, as I have said, indicate an urgent need for a review of the CS. I assess CSP 13 later, which also deals with managing an excess of housing supply. All of these mechanisms would ensure a flexible, positive and responsive planned approach to housing supply.

6.18 The CS cannot take into account a windfall allowance as there was no robust evidence of genuine local circumstances that prevent specific sites being identified. Indeed, the Council confirmed at the hearings that it did not rely on windfalls for its housing supply. Windfalls are a housing bonus which will be assessed in the AMR and which may mitigate the future need for housing allocations. Therefore, I recommend that the last part of the second paragraph of CSP 12 referring to windfalls is deleted, as are references to windfalls in the explanatory text.

6.19 The carry over of the first PPS3 five year period surplus, together with the likely HCS underestimation, means that I am satisfied that the CS meets the PPS3 requirements for the second five year period. The situation will be clearer when the Site Allocations DPD allocates specific sites, but for now the CS is sound for this period.

*The third five year period (years 11–15)*

6.20 CSP 12 identifies the broad locations for housing development by directing future growth to the built up areas defined in CSP 1 and the Key Diagram. The Council has

used "urban" and "built up" areas interchangeably in their policies and explanatory text, and I agree with it that the term should be standardised to "built up" areas.

6.21 It has not proved possible to identify specific sites, and so the Council has identified "broad locations" in accordance with PPS3 advice. I agree with the Council that the low SEP housing requirement and the HCS do not indicate a need for significant strategic urban extensions that should be identified in the CS. If the necessary sites cannot be accommodated within the built up areas then the required scale of additional sites is not likely to be beyond that of individual greenfield sites. Thus, the selection of specific sites in the broad locations of the built up areas can be left to a future Site Allocations DPD, subject to the provisos in CSP 1 that such sites should be dispersed and for infrastructure and service provision to be taken into account. This is a wholly logical and flexible approach. The SEP no longer requires a Housing Delivery Action Plan and so I recommend that ¶ 12.17 is deleted.

6.22 I agree with the Council that there is very little difference in sustainability terms between the small number of identified built up areas in the CS. And using past trends to set out housing proportions between the settlements would be imprecise due to the recent redevelopments of large military and hospital sites, particularly in the Caterham Hill area. I see little point, therefore, in trying to narrow down exactly what proportions of housing in this period would go to which built up area. Such decisions are far better left to the Site Allocations DPD when more accurate information would be available. For that reason I recommend a change suggested by the Council to specifically state in the explanatory text that a SHLAA will be carried out as part of evidence base for the Site Allocations DPD to provide that information.

6.23 I have no reason to disagree with the Council that these broad locations would be capable of accommodating the necessary housing either within them or immediately adjoining them. There was no clear evidence to persuade me that specific sites elsewhere in the District needed to be allocated now in the CS.

6.24 Given the above findings, I do not consider it necessary to consider any of the alternative sites put forward by respondents. Such matters are more properly able to be comprehensively considered in the Site Allocations DPD. Moreover, nearly all of the alternative sites had fatal flaws in their SAs (most did not provide any), and the one site at Felbridge Hotel that undertook consequent public consultation after an SA did so in an inadequate and limited manner. Thus, I cannot consider these alternative sites even had I wished to do so.

### **Location of development**

6.25 The strategy of concentration on the built up areas is at the heart of the CS as set out in CSP 1 and CSP 12. These areas contain most of the people, jobs, facilities, infrastructure and transport network, including brownfield sites. The boundary of the built up areas is currently defined in the Local Plan, and will be reviewed in the Site Allocations DPD. Neither the CS strategy nor its policies require any alteration to the boundaries of the existing built up areas or the GB as currently defined in the Local Plan.

6.26 Given the environmental constraints in the District (such as GB and AONB), the Council limited its alternative options in the SA to variations of concentrating development (including employment and retail development) in the built up areas. I consider these to be reasonable alternatives and that the Council has selected the correct strategic course of action.

6.27 But this concentration is subject to the flexibility I have previously mentioned in both policies of finding land in sustainable locations immediately adjoining the built up areas. I recommend that this flexibility should be spelt out in the first ¶ of policy CSP 1 by the additional wording: "*subject to the third paragraph of this policy.*" I

agree with the Council that other additional suggested changes by respondents would allow development involving a significant proportion of affordable housing to take place on green field land outside the built up areas, and thus they would be unsound as they would be contrary to the CS's fundamental strategy of concentration.

6.28 CSP 1 does not adequately reflect the intentions of the CS or policy CSP 12 in that it does not specify that changing the GB boundaries would only be contemplated where it is not possible to find sufficient land within the existing built up areas and other settlements. Nor is it clear that such GB revisions would only take place in sustainable locations immediately adjoining built up areas. The policy thus would be unsound under Tests 6, 7 and 9 and so I recommend two simple wording changes to clarify the latter point and to refer to CSP 12.

6.29 The SA Update of October 2007 assessed the services and facilities of the settlements in the District and placed them into two categories – category 1 where development is to be focussed; and category 2 settlements where there were fewer services and facilities and so no significant growth is proposed. This assessment of all but the Green Belt Settlements (see below) and the categorisation are soundly based in the SA. I am not persuaded that any other settlements should be added to or subtracted from that categorisation.

6.30 I agree with the Council's suggested changes to reintroduce this categorisation into policy CSP 1 and its explanatory text, and also to reinstate Woldingham into category 2 (missing in the policy, although included in Annex 3 and the SA). The categories and settlements are set out in Annex 1 of the CS, but I endorse the Council's suggestion to bring this information within the policy itself for greater clarity and soundness. Development in Woldingham is currently subject to various criteria in policy BE7 of the Local Plan and so I recommend, as the Council suggests, that it would be clearer for the policy to refer explicitly to these restrictions.

6.31 I recommend bringing the explanation in Annex 3 of how the CS applies to the built up areas and villages into the explanatory text after policy CSP 1. Without this change the CS would fail Test 7 as there would be insufficient clarity as to how the policy would operate in practice. It would also fail the same test as the definition of what development would be permitted by being "appropriate to the needs of local communities" in CSP 1 is unclear. So I welcome and recommend the Council's suggested change to add an explanation of this after ¶ 5.4.

6.32 The exact boundaries of the built up areas, the Larger Rural Settlements, and the Green Belt Settlements in CSP 1 rely upon the Local Plan Proposals Map for their exact definition. These will need to be re-examined and defined in the Site Allocations DPD, and so I recommend a change to the policy and its explanatory text (in another new ¶ after 5.4) to that effect.

6.33 In addition, I have a separate concern about the Green Belt Settlements because the SA did not assess their services and facilities. This means that there was no indication as to whether they are sufficiently sustainable to be included as category 2 settlements. And, as a consequence, there was no public consultation on this aspect of the policy. The Council subsequently, after the hearing sessions, submitted further information on their sustainability, concluding that all of the listed settlements are suitable locations for a limited amount of infilling. But this work has not been undertaken in the context of a SA, nor has it been subject to public consultation with the opportunity for all to make representations on the Council's conclusions. The policy in PPG2 (¶ 2.11) is not a justification as it is not direction but merely a possibility, and is dependant on other planning factors, such as sustainability. In addition, I am not satisfied with the Council's conclusions as they have not been rigorously tested by a SA.

6.34 I am, of course, very aware that the CS should not determine the future development of rural communities against a too narrow test of sustainable development (a concern in, for example, *The Taylor Review – Living Working Countryside*, presented to the Government in July 2008). But some of the Green Belt Settlements that I visited were little more than small, isolated collections of dwellings, clearly dependant on the private car, and which would require major development initiatives to become sustainable communities. I conclude that the CS does not provide a clear, evidence based, long term vision which balances and considers for each Green Belt Settlement their environmental, economic and social needs. The Council's late additional evidence presents too narrow a view of the sustainability test. Thus the CS fails Test 7 on this point.

6.35 I am aware that these settlements have been defined and infilling permitted for many years in the Local Plan, and that the amount of new housing likely to be produced from this source is relatively low (see ¶ 6.38 below). So one option would be to recommend that the Local Plan policies for them continue pending a later review. But it is clear from the evidence that these settlements have never been properly assessed as regards sustainability, nor have they been reassessed in the light of the major national changes in planning for housing in the countryside since they were first brought into being in the mid-1980s. Moreover, whilst the numbers of houses likely to flow from this policy would be small, any new housing could perpetuate unsustainable communities, thereby adversely affecting important Government policies on matters such as climate change.

6.36 A consequence of the removal of this policy would be that GB policies would apply to house extensions in the former Green Belt Settlements. But Local Plan policy RE8 and PPG2 would still permit extensions within specified limits.

6.37 Therefore, I recommend the deletion of the list of Green Belt Settlements from the CS and, as a consequence, that policies RE3, RE4 and RE5 in the Local Plan should be superseded by the CS in Annex 7. This would mean that the Local Plan Proposals Map would no longer show the Green Belt Settlement boundaries as the policies behind them would no longer exist. As the exact boundaries of all the settlements in policy CSP 1 will have to be re-examined in the Site Allocations DPD, I recommend that the possible inclusion of any individual GB settlement within category 2 be considered at that time, and that the CS policy and explanatory text be amended to say this.

6.38 This recommendation would not significantly affect housing land supply as the Council explained that only 8% of housing during 2001 to 2008 was found from those settlements, and that much of this was affordable housing or on non-residential land. Moreover, the Council can move forward quickly to assess and identify those settlements which should be included within category 2 of CSP 1, so any interim period would be short. I do not regard this as a critical or tough strategic decision that needs to be taken in the CS itself, but rather one which will "flesh out" the already decided principles of the CS's settlement hierarchy, and so it is a decision that can be left for the short time until the Site Allocations DPD is adopted.

### **Managing housing supply**

6.39 I have already mentioned the CS's provisions for managing an undersupply. Policy CSP 13 seeks to manage an excess of housing supply in any rolling five year period where it exceeds 20%, which is one years supply, or around 125 dwellings. It would achieve this by not permitting unidentified residential garden land (windfall land) of 5 units and above or larger than 0.2 hectares. Similar restrictions would apply if it was found that there was inadequate infrastructure or services.

6.40 Thus, it would not apply to specific identified sites, either in the HCS or in a future SHLAA. Therefore the SEP housing target would not be affected. The policy would still allow a planned over-supply above the SEP target. It would not be a total

embargo on windfall sites as, for example, commercial brownfield sites, conversions, or smaller garden land sites could still come forward.

6.41 The reasons for the policy are so that the supply of land is not exhausted, especially in the early years of the Plan period, and to ensure that development does not outstrip the necessary infrastructure and service provision. This is in line with Government advice on managing housing delivery in ¶s 62 to 67 of PPS3, which suggests a 10% to 20% variation from a target as the point at which management action could become appropriate. It also accords with recent Government advice that an excess of housing about RSS targets should be planned, and not left to chance. So I consider this policy to be reasonable and flexible, and thus sound.

6.42 Part of managing the housing supply involves knowing what range of previously developed land (PDL) performance is acceptable (¶ 63 of PPS3) so that it can be monitored and corrective action taken if necessary. Policy CSP 1 fails to do this (Test 4), and the monitoring PDL target is set at a crude 90% annual average throughout the Plan period. Within the first PPS3 five year period, most of the housing supply would come from greenfield sites, with a small number from barn conversions. So I consider that a 95% target would be reasonable.

6.43 Within the second PPS3 five year period one potential developable site at Whyteleafe Road is partly greenfield. But this site represented only some 14% at most of the total housing supply. Thus a 90% target should be achievable, given that the first PPS3 five year period overlaps two years into the CS's second five year period. There is less certainty about the last PPS3 five year period as greenfield sites may have to be allocated and only broad locations for these are presently known. The Council suggested a 70% target for this period and I think that this guesstimate would be a reasonable one.

6.44 There is even less certainty about the PDL element of the last five years of the Plan period, and so I agree with the Council that the SEP minimum (60%) would be a realistic target. The CS is highly likely to be reviewed before the end of the SEP 20 year term, which would enable the lower percentages in later periods to be reassessed. Therefore, I recommend these changes to CSP 12 and its monitoring target in Annex 2.

### **Conclusion**

6.45 With the changes that I propose, I am satisfied that the development location and housing policies are soundly based, appropriate for this District, are supported by a robust and credible evidence base, and reflect national and regional policy.

## **7. Whether policy CSP 2 provides a sound basis for the sustainable construction of and renewable energy in development, adequately reflecting national and regional policy**

7.1 The PPS1 supplement *Planning and Climate Change* advises in ¶s 31 and 33 that it could be appropriate to anticipate levels of building sustainability in advance of the national timetable (as proposed in the CS), but that the local circumstances that warrant and allow this must be clearly demonstrated. The Council do not have an evidence base which does this, and so it fails Tests 4 and 7.

7.2 Thus, I agree with (and recommend) the Council's proposed changes which "encourage" rather than "require" development to meet the Code level 3 and BREEAM "Very Good" standards. Given the inadequate evidence base, that is as far as the policy and explanatory text can go.

7.3 Similarly, ¶ 33 of the PPS1 supplement says that any policy for decentralised energy supplies to new development (and for sustainable buildings) must ensure that what is proposed is viable in terms of bringing sites to the market, avoids any adverse impact on a community's development needs, will not harm housing supply, and does not inhibit the provision of affordable housing. Again, the Council do not have an evidence base to show the required viability.

7.4 The policy requires percentage savings in CO<sub>2</sub> emissions through the provision of renewable energy. This flows from policy SE2 in the Structure Plan (SP) that sets a 10% provision and which has a proven track record in the District since 2005. However, a 20% requirement for 10+ dwellings is beyond the SP level and has no evidential basis, so I recommend the Council's changes to ensure flexibility by enabling a developer to be able to show that this higher level is not achievable and to revert to the lower 10% level. SP Policy SE2 does not set a limit applying the policy's percentage to commercial buildings, so I agree with the Council that a 500m<sup>2</sup> and above limit is a reasonable one.

7.5 With these changes I consider the policy to be sound. It would be in line with policies CC1, CC2 and CC4 in the SEP and also with national policy. I deal with the monitoring indicators and targets later.

## **8. Whether the policies for maintaining and improving the local environment are soundly based, clear and appropriate, are supported by an adequate evidence base, and reflect national and regional policy**

8.1 The Council suggested merging aspects of policies CSP 3 and 4 as they both dealt with the quality of the natural and built environment. In addition, and on reflection, the Council was concerned (as am I) that a number of the criteria in CSP 3 are very detailed, and do not add a locally distinctive viewpoint to national policy. This applies to criteria b), e), g), h), j), k) and l) in relation to existing advice in the PPS1 Climate Change supplement, PPSs 23 and 25, MPS1 and regional advice. So I recommend that they be deleted. The remaining criteria are reasonable (although bordering on being more appropriate in a Development Control DPD), and I recommend that they – a), c) and d) - be transferred to CSP 4 with a consequent change to CSP 4's title (and that of the section it is in) to the more generalist "Environmental Quality", including a reference to that policy also covering natural resources.

8.2 Policy CSP 4 is unclear in whether the listed criteria are requirements or are encouragements to action. I agree that secure and safe development and the accessibility of all commercial and community development should be requirements, as should SuDS (where they are necessary). But the remainder should be encouragements as no local evidence base exists for them and/or they are merely advisory best practice suggestions.

8.3 In particular, although I recognise that the SEP says that the CS should address the needs of the elderly, there was no evidence to show that Lifetime Homes should be required in the District in advance of its national introduction in 2013. The District is similar, albeit slightly higher, to others in having a high proportion of elderly people. No economic viability study of the impact of it being a requirement had been carried out. Other examples of adopted DPDs that I was provided with set a percentage target, whereas this criterion applies to all new dwellings. So I recommend a change to "encourage" this standard to make the policy sound (Test 7).

8.4 Aviation development in CSP 5 sets out the Council's strategic position on environmental matters with regard to Gatwick Airport, Biggin Hill Airport and Redhill Aerodrome. The CS is therefore an appropriate place for such a policy and it needs no further additions. However, the use of the term "inappropriate" in the policy implies a PPG2 GB assessment, when what is actually meant is not to permit any significantly detrimental development. So for clarity, I recommend changes to the last ¶ of the policy and ¶ 7.12 accordingly.

8.5 The Council suggested the deletion of policy CSP 6 on biodiversity as it essentially summarises national guidance in PPS9 and associated documents, and this summary was disputed by some respondents. I agree that the summary is unclear and unsound under Test 4. However, the protection of biodiversity is an important strategic topic and so I endorse the later suggested change by the Council and others which says this, relates wildlife sustainability to the Surrey Biodiversity Action Plan, and makes reference to particular projects. Its deletion would make the CS unsound, and so I recommend this locally distinctive replacement.

8.6 I agree with the Council that policy CSP 7's last ¶ is a repetition of part of PPG2 and should therefore be deleted. In general, I find this policy to be over-long and too detailed for a CS – the intention to protect and conserve the character of the area could have been stated more positively and generally, and detailed criteria left for a Development Control DPD. However, the policy is not unsound because of that, although the Council should consider this point when the CS is reviewed.

8.7 Dealing with the remainder, I find the policy to be sufficiently flexible in referring to other sources of advice, and not too prescriptive. I recommend the Council's changes to the first and second ¶s to separate out their responsibilities – character and distinctiveness, and amenity respectively. I am satisfied with the terminology used (various alternatives were canvassed), and that the policy is not over-imperative in tone. With the recommended changes I find CSP 7 to be sound.

8.8 The density of residential development is dealt with in policy CSP 8, which sets out a range for various locations as defined in CSP 1. I consider this to be too detailed a policy for a CS, although I realise that it is closely allied to character and design. The Council should consider this when reviewing the CS. However, I do not consider its inclusion makes the CS unsound.

8.9 The policy is flexible due to the different bands or areas of density, the density ranges within those bands, and the caveats within each band and in the last ¶. It strikes a reasonable balance, is based on a realistic assessment of the District's characteristics, and reflects the advice in ¶ 47 of PPS3 and policy H5 in the SEP. The walking and time distance set out in the last ¶ is reasonable in the context of the size and physical setting of the District's settlements. I recommend the Council's suggested changes to criteria a) and b) to clarify that the caveats refer to a lower density, and to add a brief explanation that different density criteria apply to Woldingham, as in CSP 1.

8.10 The Council accepted that its policy on heritage matters in CSP 9 was basically a summary of the legal situation and national policy in PPGs 15 and 16. Whilst it accepted that the policy could therefore be deleted as it was not locally distinctive, it also suggested an alternative wording by English Heritage. However, I agree with the Council's assessment of CSP 9 that this type of policy is more suited to a Development Control DPD. I therefore recommend its deletion.

8.11 The AONBs are dealt with in CSP 10. This is a policy where much of the detail which would be more suited to the Development Control DPD, leaving a more concise vision in the CS. I advise the Council to consider this in its CS review. However, I accept its strategic importance due to the large amount of AONB land in the District and so it is not unsound in principle. The evidence base supports the application of AONB

principles in Areas of Great Landscape Value for an interim period (until the CS is reviewed), and is in accord with PPS7 advice. However, the second ¶ is just explanatory and thus should be deleted, and the last sentence is purely aspirational and therefore should be moved into the explanatory text. I so recommend.

8.12 CSP 11 deals with the landscape of the District, but the Council told me initially that it repeated national policy and so could be deleted – others disagreed. The conservation and enhancement of the countryside is an important part of the strategic vision of the District, and for that reason I consider the CS should have a brief policy to that effect. I therefore recommend the Council's subsequent suggested change to retain CSP 11 in a shorter format.

8.13 The changes I have recommended will ensure that all the policies for maintaining and improving the local environment are soundly based, clear and appropriate, are supported by an adequate evidence base, and reflect national and regional policy.

**9. Whether clear and appropriate provision is made for affordable housing, specialist housing, and the general housing mix having regard to national and regional policies, which are fully justified and supported by a credible and robust evidence base**

**Affordable housing**

9.1 The CS deals with affordable and other specialist housing requirements in its "Housing Need and Balance" section. This is appropriately placed in the CS following my recommended change to move this whole section ("Social Progress") to after CSP 1.

9.2 The CS has been informed by a wide range of documents setting out the evidence base for affordable housing in the District. This includes a Housing Needs Survey (HNS) in 2005 and a joint East Surrey Strategic Housing Market Assessment (SHMA) in early 2008, with other supporting technical papers. The findings show a very high level of need – some 11 times the average annual delivery over the past three years. The SHMA recommends that a 40% target of affordable homes is used on all eligible sites, and that thresholds below the 15 unit indicative national minimum set out in PPS3 should be considered in both urban and rural situations.

9.3 The draft SEP also proposes a 40% target in the London Fringe and Gatwick sub-region areas, which cover most of the District. Elsewhere the SEP proposes 25% social rented and 10% other forms of affordable housing. SP policy DN11 also sets a 40% target. The current Local Plan policy HO9 seeks a 30% target with the thresholds (¶ 6.66) set at in urban areas 25 or more dwellings or sites of 1 hectare or more, and in rural areas 10 or more dwellings or sites of 0.4 hectare or more. Both the SP and Local Plan have a different affordable housing definition to that now current in PPS3. Policy CSP 14 proposes a range of variable thresholds on urban and rural sites of different sizes, all below the PPS3 national minimum, with a range of targets varying between 30% and 40% dependant on location.

9.4 Unfortunately, the Council's evidence base fails to provide adequate justification for the economic viability of the thresholds and the proportions of the affordable housing proposed, as required in ¶ 29 of PPS3. The only evidence for economic viability is contained in an October 2003 report on *The Economics of Affordable Housing in Surrey*. My first concern here is that the report is very out of date, particularly in today's challenging financial climate for house building – it is nearly five years old. Secondly, the report's recommended thresholds that were all at higher levels than those currently proposed in the CS. The report's thresholds were 15 units/0.5ha for urban areas and 10 units for rural areas (¶ 8.46). On the percentage of affordable

housing, the report said that 40% "would appear" to be acceptable, but that the impact on site viability above 30% should be carefully assessed for individual sites (¶ 9.61). At these thresholds and percentages the report was very cautious about development viability (¶ 11.3). And my third concern is that at the time of this report affordable housing would have included low-cost market housing (not now included in PPS3), which would have aided development viability.

9.5 As the Council's evidence base for this policy is flawed and fails Test 7, I intend to recommend that an interim holding policy be substituted, based on policies in the existing Development Plan and past practice which has been shown to work. I also urge the Council to prepare an Affordable Housing DPD as quickly as possible. The Council recognised that such a DPD might be necessary in its suggested changes, and so I have included reference to this in my own recommended changes. I am satisfied that the interim policy I recommend would be satisfactory for the immediate future (3 to 4 years) and, most importantly, that it would meet the strategic objectives of the CS. This approach (with minor differences) has been suggested as a possible solution to a similar problem in the July 2008 Blyth Valley Court of Appeal case (¶ 32 of Blyth Valley Borough Council and Persimmon Homes (North East) Limited, Barratt Homes Limited, & Millhouse Developments Limited - C1/2008/1319).

9.6 Existing policies include low-cost market housing which is excluded under PPS3. I therefore have to be more circumspect in setting percentage and unit thresholds without low-cost market housing (although I note that the CS says that such housing may be acceptable in some circumstances). I am also conscious of the provisions of the draft SEP, but these have not yet been adopted. I understand that the Council's present practice is to use a percentage target of between 30% and 40% - 35% across the board and 40% in the London Fringe sub-region – as a combination of SP and Local Plan policy targets. Recent examples of affordable housing percentages achieved on market housing sites range from 30% to 37% (Appendix 3 of TDC/CSP14). All the relevant factors set out above lead me to recommend a 34% level across the whole District as being both economically viable and within existing policy and recent practice percentage ranges.

9.7 On the question of unit or area thresholds, I consider that the thresholds considered in the 2003 Economic report provide the best available evidence base for the interim CS targets. I believe these to be viable as I have set the overall percentage target at a lower level than that in the report and the Council said it has been operating the built areas threshold since April 2007 with no viability concerns arising. I am satisfied that the wording of the thresholds and targets should not be made more prescriptive as they should remain flexible in operation.

9.8 The Council said that its overall affordable housing target from all sources of 50 dwellings per year was a realistic one based on past delivery and future funding, even though it would not meet the identified need. I agree. I am satisfied that the policy's suggestion of the type or tenure of affordable housing on a site is reasonable, realistic, and based on credible evidence in the East Surrey SHMA. But there should be more explanation of this mix and the other alternatives that might be open to a developer as set out in the Affordable Housing Technical Paper. Without this the CS would be unclear and so not sound. I therefore recommend the Council's suggested changes to ¶s 13.7, 13.11 and 13.12, and the deletion of ¶ 13.9.

9.9 The policy does not refer to the further information about affordable housing in Annex 5, and so I recommend changes to do this. In addition, the Council's definition of affordable housing in Annex 5 does not reflect the PPS3 requirement to remain at an affordable price or for the subsidy to be recycled. As the CS would otherwise fail Test 4, I recommend the Council's suggested change to rectify this problem.

### **Rural exceptions**

9.10 CSP 15 allows for affordable housing adjoining rural settlements and its principle is in line with PPS3 advice. However, it is uncertain in some respects as it does not make clear where additional information to operate the policy can be found in the CS (Annex 5); it does not specify that housing need relates to the parish or the settlement; and Smallfield is missing from the Annex 5 list. Therefore, to make this policy sound I recommend the suggested changes by the Council to resolve these points.

### **Rural allocations**

9.11 CSP 16 is similar to CSP 15, but relates to Larger Rural Settlements and Green Belt Settlements (once defined). Again, in principle it follows advice in PPS3. But Annex 5 mainly repeats a list of GB settlements for which, as I have previously explained, there is no credible or robust evidence base and so is unsound. I am unconvinced, therefore, that the existing listed settlements are of sufficient sustainability to justify a rural affordable housing allocation. I recommend, therefore, similarly to CSP 1, that the defined rural settlements to be included are determined in the Site Allocations DPD, and that the policy should be amended accordingly.

### **Extra Care Housing**

9.12 Policy CSP 17 plans for, and ¶ 13.20 recognises, the proven need for Extra Care Housing in the District. I agree with the Council and a respondent who considered that the CS was not sound as this specialised provision should be in a separate policy and not "lost" in CSP 17, and that specific criteria should be drawn out from the CS to guide such development. As a consequence, monitoring targets would need to be inserted into Annex 2 and ¶ 13.20 would need to be amended. The changes necessary to achieve this were set out in a Statement of Common Ground, which I recommend. I am satisfied that this new policy has a good evidence base, has been adequately considered in the SA, and solely involves a gathering together of existing sound CS policy on this subject in one place, thereby aiding clarity and certainty.

### **Housing Balance**

9.13 The housing balance or mix of house types within developments is set out in CSP 17, which is encouraged in PPS3. Such matters should not be left to the vagaries of the housing market. ¶ 13.17 sets out the private sector stock/analysis from the HNS. In the light of this and the SHMA information, the Annex 2 Monitoring target is for 70% of dwellings per year to be one, two or three bedrooms, but avoiding a concentration of one dwelling type, which I believe is soundly based. The Council said that that the housing mix will alter in accordance with current needs in future SHMAs and HNSs in order to give future flexibility. I agree with this updating procedure but, for clarity, I recommend that the policy says this. The AMR would be able to alter the monitoring target if future evidence indicates a need to do this.

9.14 I have some concern that the Council has concentrated on bedroom numbers rather than household types (second point in ¶ 22 of PPS3), but there is a sufficient correlation between the two for the policy to remain sound. In a future review of the CS no doubt the Council will examine this point more closely.

### **Gypsy and Traveller caravan and Travelling Showmen's sites**

9.15 Policy CSP 18, and the similar CSP 19, are primarily criteria based policies to guide this type of specialised housing, and are underpinned by the 2007 East Surrey Gypsy and Traveller Accommodation Assessment. Circular 1/2006 says that setting a maximum number as a blanket policy is arbitrary (Annex C), so I recommend the Council's change to make the policies sound by merely referring to numbers being small and "appropriate" to the site and other factors.

9.16 Overall, I conclude that with the changes I recommend, that the CS has made clear and appropriate provision for affordable housing, specialist housing, and the general housing mix. And that these policies have regard to national and regional policies, and are fully justified and supported by a credible and robust evidence base.

**10. Whether clear and appropriate strategic policy and guidance on infrastructure and other services is provided, supported by a robust and credible evidence base, reflecting national and regional policy**

10.1 Policy CSP 20 sets out the basis for requiring contributions towards infrastructure and services. The Council's assessment was that there are currently no overriding infrastructure obstacles to development, but that some infrastructure and services are under pressure. The evidence I was given supported that view – there may be anecdotal evidence of temporary concerns, but there was nothing of substance to indicate long term capacity problems.

10.2 The policy sets the strategic framework for required improvements by section 106 obligations and by the forthcoming Community Infrastructure Levy. It does not need to go into further detail. However, it is clear that such financial requirements will have implications for development viability, and so I am doubtful under Test 4 that such matters should be dealt with by a Supplementary Planning Document (SPD) where they would not be subject to independent examination. I therefore recommend the removal of that intention from the policy and the explanatory text, which will give the Council the flexibility to consult with Government and others on the most appropriate way of setting the charge levels.

10.3 I also recommend the Council's suggested changes to make it clear that permission for development will only be granted where infrastructure capacity exists or can be provided. The third ¶ is aspirational and about process and is not appropriate as a policy (Test 7), so I recommend it be moved to the explanatory text. For clarity (Test 7) it should make clear that it applies to all development, not just housing, and that community stakeholders will be involved in monitoring provision. With these changes I find the policy sound.

10.4 Transport and travel services policy is set out in CSP 21. The explanatory text at ¶ 15.4 refers to the possibility of a relief road for East Grinstead associated with potential development in Mid Sussex, and this is shown notionally on the Key Diagram (which should be clearer). This accords with advice in the draft SEP which says after policy GAT3 that where development is planned close to administrative boundaries, for example at East Grinstead, neighbouring authorities will take the necessary steps to ensure that essential infrastructure is put in place to support the development. My recommendation here is that the explanatory text needs to be made clearer to accord with the SEP (Tests 4 and 7), particularly clarifying that whilst the Council in general opposes new roads, the relief road might be acceptable in specified circumstances. It was unclear to me whether any such relief road would be within or excluded from the GB, but this detail can be left for a later decision.

10.5 On the policy itself, the first bullet point and second ¶ repeat national policy and so I recommend their deletion (Test 4). The third ¶ is aspirational and explanatory, and so is inappropriate within a policy - I thus recommend its removal to the explanatory text (Test 7). The last ¶ is an explanation of the third bullet point on parking standards and so I recommend its removal to the explanatory text, without its reference to a SPD, for the same reasons as in ¶ 10.2 above on policy CSP 20.

10.6 Policy CSP 22 and the Glossary in Annex 6 do not define what is meant by cultural services, community, sport or recreation facilities. I do not understand how a "cultural service" (such as a theatre) could be safeguarded, and the term is not mentioned in the explanatory text. I therefore recommend the deletion of that term in the policy and titles, and a new definition of "community, sport and recreation facilities and services" in the Glossary.

10.7 I understand that the Council intends to use national policy to assess the loss of facilities and services, but its summary in ¶ 2 concerning open space, sport and recreation facilities is subtly different from that set out in PPG17 and thus fails Test 4. So I recommend that the policy says that it will operate in accordance with national policy. The third ¶ is very brief in its description of how other facilities or services would be dealt with, and its criteria are not flexible and so not appropriate to all circumstances. I therefore recommend that the policy just says that these aspects will operate in accordance with PPG17 principles and that more detail will be set out in the Development Control DPD.

10.8 In conclusion on this issue, with the changes I recommend I find that the CS has clear and appropriate strategic policy and guidance on infrastructure and other services, it is supported by a robust and credible evidence base, and it reflects national and regional policy.

## **11. Whether the policies for a sustainable economy are soundly based, appropriate, and supported by a robust and credible evidence base which reflects national and regional policy**

11.1 Economic development in the District is guided by policy CSP 23, which sets out the measures proposed to develop a sustainable economy and to protect the District's employment base. Criteria b) and h) are repeats of national policy (PPS6 and PPG8 respectively), and criterion g) is a repeat of a similar criterion in CSP 4 (Tests 4 and 6). Criterion d) is a stricter test than that set out in PPS7 and there is no evidential base for its inclusion. So I recommend their deletion, with two added explanations to criterion c) that the Council's preference for the re-use of rural buildings is economic and that one of the factors is farm viability (both to reflect PPS7 advice).

11.2 I was told that the Council will continue to operate saved Local Plan policy RE6 to guide the conversion of buildings in the Green Belt outside settlements until a new detailed policy is adopted in a Development Control DPD. Likewise, the Council intends have a detailed policy for the reuse of commercial and industrial sites in a Development Control DPD. I recommend that the policy and the explanatory text say this for the sake of clarity. Similarly, the Council's intention to prepare a site brief for Hobbs Industrial Estate (a SES) should be included in the explanatory text (¶ 17.6).

11.3 At 58% Tandridge has the highest percentage of the Surrey workforce who commute outside the District to work, 32% to London, with very low levels of unemployment. The economy is inextricably linked with the wider region and London. It has remained relatively stable since 1999, and vacancy rates have remained low over the period 1991 to 2004. The evidence base shows little demand and a poor market for new and existing premises – there were no new completions in 2005-2006, and the main completion in 2006-2007 was from one large unit at a site now identified in the CS as a Strategic Employment Site (SES), two of which have been designated.

11.4 In the light of the above from the updated 2007 Economic Study, the CS does not propose additional employment floorspace, apart from that on the SESs which is already planned (but not yet fully provided). The policy also identifies "smart growth"

within existing developments and by working from home. None of the evidence suggested that more employment floorspace than that proposed should be allocated, with any new demand being met through the re-use of existing sites. I consider that the policy reflects the economic characteristics and needs of the District, is supported by a robust evidence base, and broadly reflects national and regional policy.

11.5 I have included CSP 25 within this section as it deals primarily with the economy of rural areas. However, all of its criteria are either repeats of policies elsewhere in the CS (criteria a) and d)), repeats of national policy (criterion a) and b)), or are only aspirational and so not appropriate (criteria c) and e)). It fails Tests 4, 6 and 7. I therefore recommend the Council's suggestion to delete it, but to retain the explanatory text, with minor amendments and the deletion of policy references, as an indication of the Council's intentions for rural areas.

11.6 Overall, with my recommended changes I believe that the strategy for employment development is appropriate to this District. In my view, policy CSP 23 sets a soundly based, flexible framework to guide decisions on future employment.

## **12. Whether the policy for town and other centres is soundly based and appropriate, reflects national and regional policy**

12.1 Policy CSP 24 seeks to protect and enhance Caterham Valley and Oxted town centres, as well as the role of other smaller centres throughout the District. Many of the criteria repeat national policy in b), c), d), e) and f) and so fail Test 4. I therefore recommend their deletion as this would not harm the CS's vision and would make it sound. I agree with the Council's suggestion that the hierarchy of centres set out in ¶ 18.9 should be moved to the policy as it lies at the heart of the strategy, and thus I recommend it. The Council said that some smaller centres would be defined in a Development Control DPD, together with a policy to protect their role. In order for the policy to be absolutely clear (Test 7), I recommend that it states this.

12.2 It became clear during the hearing sessions that the Council intended to pursue the redevelopment of the former Rose and Young site in Caterham, and the gas holder site in Oxted for appropriate town centre and/or residential uses. The policy does not say this, and as it is an important part of the vision for the two centres the policy fails Test 7 (appropriateness). To make the policy sound I recommend that those sites be included along with the Council's also stated intention to bid for funding following retail health checks of the two centres.

12.3 Similarly, the Council intends to use the current definition of Primary Shopping Areas in the Local Plan under saved policy SH2 until it is redefined and a new protection policy produced in a Development Control DPD. The policy and explanatory text should clearly state this as it forms part of the strategic vision for the two centres, and the CS would be unsound unless I recommend (as I do) that change.

12.4 The final report of the 2007 Retail Needs Assessment does not indicate a need for more comparison shopping floorspace in Oxted, which is likely to see a decline in demand for comparison goods floorspace. Although there is a demand in Caterham, this is nullified by its closeness to Redhill, which is a more attractive location for retailers. Nevertheless, the report says that any regeneration proposal in Caterham could be supported in principle. Therefore, I consider that the retail needs of the District in the immediate future are well served by the policy as recommended to be changed, are supported by a credible evidence base, and broadly reflect national and regional policy.

### **13. Whether there are clear mechanisms for implementation and monitoring**

13.1 Annex 2 of the CS contains spatial objectives, indicators, targets and comments on the delivery of the policies. The Annex has to be read with the housing trajectories and the SA objectives, indicators and targets.

13.2 Monitoring should adopt a positive, future orientated approach. In particular, it requires the identification and monitoring of a set of key indicators and targets, such as the delivery of new housing. It also depends on the means of implementation being clearly established and the identification of possible ways forward for revising and adjusting policies if delivery problems are identified by the AMR. Targets should allow for direct effects to be measured and should be SMART (**S**pecific; **M**easurable; **A**chievable; **R**ealistic; **T**ime-bound). Not all of the targets fit these requirements as some of them, and some indicators, presently have no means of measurement. Thus the CS in its submitted form fails Test 8.

13.3 However, during the examination the Council re-assessed the contents of Annex 2 using the Government's *LDF Monitoring: Good Practice Guide* and set some new or amended indicators, targets and delivery mechanisms, and published them for comment. I consider these changes to be solely modifications based on the SA. That being the case, I consider I am able to recommend them, with suitable deletions and additions where I have recommended other changes to the policies.

13.4 Even so, the monitoring provision is not ideal but a pragmatic approach is required, especially as flexibility is not seriously compromised. Some policies cannot have a target set due to the lack of base information or because of their nature, but I have left them in so that the Council can review them in a later CS. So overall I consider that the monitoring provision would meet the key test of providing sufficient information to assess policy implementation and its significant effects, having regard to the Council's available resources (¶ 4.28 of the Good Practice Guide). Thus, with the changes, I find the CS sound under Test 8.

### **14. Whether the other parts of the CS are appropriate, consistent with national and regional policies planning policies**

14.1 Annex 4 contains the Housing Trajectory, and I recommend it be changed to reflect the changes I have made in the housing section of my Report. The last two columns of the table should be deleted (residual figures), and the remaining columns brought up to date in line with the figures produced by the Council during the Examination and to reflect the changed figures from my Report. The chart should be similarly changed to bring it up to date, and to delete the green residual annual average line. The expected completions for small and medium sites should remove any element of windfall development arising from the HCS. With these consequential changes the Housing Trajectory would be sound.

14.2 I have already mentioned necessary changes to Annex 7 as a result of my recommendations on CSP 1. The alterations and changes to the other CS policies that I have recommended will also alter whether some of the Local Plan policies are to be saved or not, and I recommend these consequential changes.

14.3 The Council wishes to make minor changes to the submitted CS in order to clarify, correct and update various parts of the text. Although these changes do not address key aspects of soundness, I endorse them on a general basis in the interests of clarity

and accuracy. These changes are shown in my Annex A: Schedule of Changes in ordinary type.

## **15. Overall Conclusions**

15.1 I conclude that, with the changes I recommend in Annex A: Schedule of Changes, the CS DPD satisfies the requirements of s20(5) of the 2004 Act and the associated Regulations, is sound in terms of s20(5)(b) of the 2004 Act, and meets the tests of soundness in PPS12.

*David Vickery*

INSPECTOR

## Annex A: Schedule of Changes

The following Schedule sets out the Changes that are necessary to make sound and clarify the CS. It includes all my recommendations described earlier in this Report together with changes put forward by the Council to aid clarity and update the document in preparation for adoption. The Changes are expressed either in the conventional form of strikethrough for deletions and underlining for additions of text, or by specifying the change in words in *italics*.

Where the changes are uncontroversial they have not necessarily been referred to in my Report. The items in **bold** under the Policy/Para column heading are specifically mentioned in my Report as being necessary to make the Plan sound.

Page numbers and paragraph numbering refer to the submission CS, and do not take account of the deletion or addition of policies and explanatory text. Therefore, the text in the adopted version will have to be altered to reflect the consequential page, policy and paragraph numbers.

Page	Policy/ Para	Recommended Change	Report Ref
-	<b>Whole Plan</b>	<i>Ensure that the explanatory text is placed clearly next to the relevant policies they refer to.</i>	3.10
-	<b>Whole Plan</b>	<i>Insert clearly designed title pages to each of the sections that are identified in black print on the contents page.</i>	3.10
-	Whole Plan	<i>Consequential renumbering.</i>	1.16
3	<b>After 1.6</b>	<p><i>Insert new paragraph:</i></p> <p><u>The time period for this strategy is until 2026, the end date of the South East Plan (SEP). The strategy shows how housing will be delivered over a 15 year delivery period as required by the Government. In some cases a shorter time period is necessary, as the need for a particular policy can change over a relatively short period.</u></p>	3.4
3-4	1.3 to 1.6 & 1.9	<i>Delete.</i>	1.16
5	2.2	<i>...There are three main <u>urban built up</u> areas...</i>	6.20
6	2.12	<i>... from the larger <u>urban built up</u> areas and ...</i>	6.20
8	<b>Issue 3</b>	<i>...Adequate infrastructure ... to accompany new <u>housing development</u>...</i>	5.4
10	3.6	<i>... both in the <u>urban built up</u> and rural ...</i>	6.20
13	<b>Title</b>	<i>5 Spatial Objectives and Spatial Strategy</i>	3.11
13	5.1	<i>Amend ninth "Environmental Protection" objective to: ... the <u>urban built up</u> and rural areas.</i>	6.20
13	<b>5.1</b>	<i>Amend second "Social Progress" objective to: ... to accompany new <u>housing development</u>.</i>	5.4
13	<b>5.1</b>	<i>Move the box on "Social Progress" to before the box on "Environmental Protection".</i>	3.11

Page	Policy/ Para	Recommended Change	Report Ref
14	<b>5.2</b>	<i>Delete paragraph.</i>	3.4
14/15	<b>5.3 to 5.5 &amp; CSP 1</b>	<i>Move these ¶s and policy CSP 1 to within and at the beginning of the "Social Progress" section.</i>	3.11
14	5.3	... take place within the existing <u>urban built up</u> areas of ... to the existing <u>urban built up</u> areas where ...	6.20
14	5.4	... growth will be directed to land immediately adjoining the <u>urban built up</u> areas... The Sustainability Appraisal considered the options of directing development to the <u>urban built up</u> areas by making best use of previously developed land or allocation sites of different sizes on the edge of the <u>urban built up</u> areas. It also considered the relative sustainability of the different <u>urban built up</u> areas in the district;... No hierarchy of the <u>urban built up</u> settlements is proposed as there are no significant differences between the areas in terms of sustainability. There is no proposal to change the functions of the <u>urban built up</u> settlements either.	6.20
14	<b>After 5.4</b>	<p><i>Insert new ¶ after 5.4:</i></p> <p><u>The Green Belt, the built up areas, the Larger Rural Settlements, and the Green Belt Settlements boundaries are defined on the Tandridge District Local Plan 2001 Proposals Map.</u> However, Local Plan policies RE3 and RE5 will be superseded by the Core Strategy so the Green Belt Settlement boundaries will no longer apply. All of these boundaries will be reviewed in the Site Allocations DPD, which will be accompanied by a new proposals map showing the reviewed boundaries.</p>	6.32
14	<b>After 5.4</b>	<p><i>Insert new ¶ after 5.4:</i></p> <p><u>Development appropriate to the needs of rural communities in relation to Category 2 settlements, as referred to in policy CSP 1, will be assessed as follows:</u></p> <ul style="list-style-type: none"> <li><u>Where infilling is proposed on existing residential land it should be of a scale appropriate to the size and character of the settlement and the extent to which it would not reinforce unsustainable patterns of travel;</u></li> <li><u>Where infilling comprises the redevelopment of non-residential land it would assist in delivering the objective making the best use of previously developed land;</u></li> <li><u>The proposed development would assist in meeting the need for affordable housing, particularly to meet local needs.</u></li> <li><u>The proposed development would assist in the retention or enhancement of community facilities.</u></li> </ul>	6.31
15	<b>CSP 1</b>	In order to promote sustainable patterns of travel and in order to make the best use of previously developed land, development will take place within the existing built up areas of the District ( <u>the Category 1 settlements listed below</u> ) and be located where there is a choice of mode of transport available and where the distance to travel to services is minimised <u>subject to the third paragraph of this policy.</u>	6.27, 6.28, 6.30, 6.32, 6.36, 6.41, 6.42 &

Page	Policy/ Para	Recommended Change	Report Ref
		<p>There will be no village expansion by amending the boundaries of either the Larger Rural Settlements or Green Belt Settlements. <u>All the settlement boundaries will be reviewed in the Site Allocations DPD and the accompanying Proposals Map.</u> Development appropriate to the needs of rural communities will be permitted in the Larger Rural Settlements and Green Belt Settlements (<u>the Category 2 settlements listed below</u>) through infilling and on sites allocated for affordable housing. <del>Rural Exceptions sites to meet local needs may also be acceptable. There will be no expansion of Woldingham (also a Category 2 settlement): saved policy BE7 "Woldingham" of the Tandridge District Local Plan 2001 will continue to apply to development within the settlement boundary until this is replaced by a policy in the Development Control DPD.</del></p> <p>There will be no change in the Green Belt boundaries, unless it is not possible to find sufficient <del>previously developed</del> land within <del>the existing built up areas and other settlements</del> to deliver current and future housing allocations. Such changes will only take place at sustainable locations <u>as set out in policy CSP 12</u> whilst having regard to the need to prevent built up areas from coalescing. Any changes will be made through a <del>s</del>Site <del>a</del>Allocations Development Plan Document and the accompanying Proposals Map.</p> <p>Where there is a requirement to allocate green field sites the preference will be to find a number of sites to disperse the impact of development; the location of such sites will need to take into account existing and proposed infrastructure and service provision.</p> <p><u>The targets for the amount of housing to be provided on previously developed land are as follows:</u></p> <p><u>2006 - 2011 - 95%</u></p> <p><u>2011 - 2016 - 90%</u></p> <p><u>2016 - 2021 - 70%</u></p> <p><u>2021 - 2026 - 60%</u></p> <p><b><u>Category 1 Settlements:-</u></b></p> <p><u>Caterham</u></p> <p><u>Oxted (including Hurst Green and Limpsfield)</u></p>	6.43

Page	Policy/ Para	Recommended Change	Report Ref
		<p><u>Warlingham</u>  <u>Whyteleafe</u></p> <p><b><u>Category 2 Settlements:-</u></b></p> <p><u>Woldingham</u></p> <p><u>Larger Rural Settlements:</u>  <u>Lingfield</u>  <u>Smallfield</u></p> <p><u>Green Belt Settlements:</u>  <u>The settlements within this classification and their exact boundaries will be decided in the Site Allocations DPD and its accompanying Proposals Map.</u></p> <p><u>(NB. Larger Rural Settlements are excluded from the Green Belt and Green Belt settlements will be "washed over" by the Green Belt but within which infilling is allowed)</u></p>	
15	<b>After CSP 1</b>	<p><i>Insert all text from Annex 3 after policy CSP 1, with the following changes:</i></p> <p><i>Additional text for the section on Woldingham:</i></p> <p><i>... adverse impact on the special character of the area, therefore saved policy BE7 "Woldingham" of the Tandridge District Local Plan 2001 will continue to apply to development within the settlement boundary until this is replaced by a policy in the Development Control DPD.</i></p> <p><i>In the section on Green Belt Settlements:</i></p> <p><i>The Green Belt Settlements (see Annex 1) are washed over ... The settlements to be included within this classification and their exact boundaries will be decided in the Site Allocations DPD. Housing to meet local ...</i></p>	6.31
16	<b>6.2</b>	<p><i>... Consequently new residential and commercial development with a floor area of over 500m<sup>2</sup> will have be encouraged to meet a prescribed minimum standard current best practice standards in sustainable construction.</i></p>	7.2
16	<b>6.3</b>	<p><i>... rating the 'whole home' as a complete package. therefore the adoption of this standard will ensure that future development within Tandridge considers all aspects of sustainable development.</i></p>	7.2
16	<b>6.4</b>	<p><i>... If the Government adopts these progressive targets they will supersede the requirements set out in policy CSP2. In</i></p>	7.2

Page	Policy/ Para	Recommended Change	Report Ref
		<del>the short term, however, it is important that a policy is provided to ensure the good practice achieved by the Council so far continues to progress until the regulatory standards are in place.</del>	
16	6.7	To ensure compliance with the prescribed minimum standard of the Code for Sustainable Homes the EPS should also include a design stage assessment and the interim Code certificate. <u>If developers are unable to meet the 20% target on sites of 10 or more units this should be justified in the EPS.</u>	7.4
17	6.9	Small scale renewable energy projects will be <u>encouraged</u> <u>permitted</u> , ...	1.16
17	CSP 2	<p><u>The Council will encourage</u> all residential development (either new build or conversion) <del>will be required</del> to meet Code level 3 as set out in the published Code for Sustainable Homes. Commercial* development with a floor area of 500m<sup>2</sup> or greater will be <u>required</u> <u>encouraged</u> to meet <u>the</u> BREEAM "Very Good" standard.</p> <p><u>As part of the requirement to meet the minimum energy standards set out at Code level 3</u> All new residential development (either new build or conversion) <u>and</u> <u>commercial* development with a floor area of 500m<sup>2</sup> or greater</u> will be required to reach a minimum percentage saving in CO<sub>2</sub> emissions through the incorporation of on-site renewable energy (as set out in the table below). <u>The requirement varies according to the type of development</u> and, in the case of dwellings, the size of development.</p> <p>Commercial* development with a floor area of 500m<sup>2</sup> or greater will be required to reach a minimum percentage saving in CO<sub>2</sub> emissions through the incorporation of on-site renewable energy generation (as set out in the table below). The requirement varies according to the type of development and in the case of dwellings, the size of development.</p>	7.2 & 7.4

Development Type	Percentage savings in Carbon Dioxide emissions through the provision of renewable energy technologies
Dwellings (1-9 units)	10%
Dwellings (10+ units)	20%**
Commercial* (500m <sup>2</sup> +)	10%

Page	Policy/ Para	Recommended Change	Report Ref
		<p>Development over 5000m<sup>2</sup> will be expected to incorporate combined heat and power or similar technology.</p> <p><del>The Council will encourage the development of Small scale renewable energy projects <u>will be permitted except</u> where appropriate in commercial,* industrial and residential schemes, subject to any <u>there are overriding</u> environmental, heritage, landscape, amenity or other constraints. <u>that may exist.</u></del></p> <hr/> <p>* Commercial includes all forms of non-residential development, for example social and leisure related development.</p> <p><del>** Only where a developer can satisfy the Council why the higher target of 20% cannot be achieved will the lower target of 10% be applied</del></p>	
18	Title	<b>Environmental Protection and Quality of Development</b>	8.1
19	7.8	<p>The <u>Surrey Waste Plan Development Framework</u> being produced adopted by Surrey County Council in May 2008 will sets out the principal strategy for waste minimisation and disposal within the County. Additional capacity or replacement waste management facilities may be required within the District. The plan identifies part of the Hobbs Industrial Estate as a potential location for a waste management facility. The <u>Surrey Minerals Plan Development Framework</u> will identify new sites for mineral extraction. However the lead for identifying such sites will be taken by the County Council and it will be their responsibility or that of their contractors to acquire or lease sites and to secure the necessary consents. In due course the District Council's Proposals Map will incorporate any site specific allocations arising from the approved Surrey Waste or Minerals <u>Plans Local Development Frameworks</u>.</p>	1.16
20	CSP 3	<p><i>Delete.</i></p> <p><i>(Note criteria a), c) and d) to be merged with CSP 4)</i></p>	8.1
21	CSP 4	<p><b>Quality of Development Environmental Quality</b></p> <p>In order to promote a high quality, flexible, and safe living environment <u>and to minimise the impact on natural resources</u> the Council will seek to ensure that:</p> <p>a) <u>require the design and layout of new development is to be safe and secure, by the inclusion of measures to address</u></p>	8.1, 8.2, & 8.3

Page	Policy/ Para	Recommended Change	Report Ref
		<p>crime and disorder and where possible meets "Secured by Design" Standards.</p> <p>b) <u>require all commercial and community development, including conversions, is to be</u> designed to be accessible <u>and will to</u> meet the needs of those with disabilities, including occupiers, employees and visitors.</p> <p>c) <u>require Sustainable Urban Drainage Systems (SuDS) to be included where necessary;</u></p> <p>d) <u>encourage new dwellings are to be</u> designed to include "Lifetime Homes" principles so that they can be readily adapted to meet the needs of those with disabilities and the elderly.</p> <p>e) <u>encourage the reuse of buildings before redevelopment;</u></p> <p>f) <u>encourage innovative construction methods, such as "green roofs" to impede the flow of surface water run-off are included where appropriate;</u></p> <p>g) <u>encourage all development makes to make</u> provision for grey water recycling and/or <u>require</u> the separate disposal of surface and foul water to adoptable standards, including the provision of improvements to local sewer networks/treatment works where necessary.</p> <p>h) <u>encourage new dwellings development to include</u> cabling and other technical resources to allow for the installation of information/communication technology. <u>to permit easier home working.</u></p> <p>Design <u>and Access</u> Statements should demonstrate how the above matters have been addressed <u>or conversely, why it is not practicable or appropriate to do so.</u></p>	
21	<b>7.12</b>	<p><i>In the last sentence:</i></p> <p>... any other <u>inappropriate</u> development, <u>which if it</u> is likely to lead to additional aircraft movements ...</p>	8.4
22	<b>CSP 5</b>	<p><i>In the last ¶:</i></p> <p>.....The Council will not permit the construction of a reinforced runway or other <u>inappropriate</u> development <u>if it is likely to be significantly detrimental to the local community.</u></p>	8.4
23	8.3	<p>This will be achieved <u>by identifying the hierarchy of sites,</u> by actions taken by the Council ...</p> <p>... Planning Policy Statement 9 - Biodiversity and Geological Conservation, which provides <u>additional</u> guidance on ...</p>	1.16
24	<b>CSP 6</b>	<p><i>Delete and replace with:</i></p> <p><u>Development proposals should protect biodiversity and provide for the maintenance, enhancement, restoration and, if possible, expansion of biodiversity, by aiming to restore or create suitable semi-natural habitats and ecological networks to sustain wildlife in accordance with the aims of the Surrey</u></p>	8.5

Page	Policy/ Para	Recommended Change	Report Ref
		<p><u>Biodiversity Action Plan.</u></p> <p><u>The Council will seek to enhance biodiversity by supporting the work of the Downlands Countryside Management Project and by supporting Local Nature Reserves and Community Wildlife Areas.</u></p>	
27	<b>CSP 7</b>	<p><i>In the first ¶:</i>  <u>... high standard of design that has regard to and respects must reflect and respect the character ...</u></p> <p><i>In the second ¶:</i>  <u>Development must reflect the local distinctiveness of particular areas and must not significantly harm ...</u></p> <p><i>Delete last ¶.</i></p>	8.6 & 8.7
27	<b>CSP 8</b>	<p>a) Rural Areas ... distinctiveness of an area <u>where a lower density is more appropriate</u>; ... or Supplementary Planning Documents. <u>Saved policy BE7 "Woldingham" of the Tandridge District Local Plan 2001 will also continue to apply to development within the settlement boundary until this is replaced by a policy in the Development Control DPD.</u></p> <p>(b) Built up areas ... an area <u>where a lower density is more appropriate</u>; ...</p>	8.9
28	<b>CSP 9</b>	<i>Delete.</i>	8.10
29	<b>11.4</b>	<p><i>Add to end of ¶:-</i>  <u>The Council will work with its partners to secure an urgent review of the AONB by Natural England.</u></p>	8.11
30	<b>CSP 10</b>	<p><i>Delete second main ¶.</i></p> <p><i>Delete the last sentence of the last ¶.</i></p>	8.11
30	11.6	Although the quality of the landscape around the <u>urban built up</u> areas remains generally high	6.20
31	<b>CSP 11</b>	<p><i>Delete and replace with:</i></p> <p><u>The character and distinctiveness of the District's landscapes and countryside will be protected for their own sake; new development will be required to conserve and enhance landscape character.</u></p>	8.12
32	<b>Section</b>	<i>Move the "Social Progress" section (explanatory text and policies) to immediately after the "Part 2 Vision and Strategy" section.</i>	3.11
32	12.1	The South East Plan (SEP) is <u>emerging and should</u> will be adopted <u>by 2008 in 2009</u> . In August 2007 the Panel who held the Examination into the draft Plan published their report. The Panel have recommended that the allocation to Tandridge be increased from 2,240 dwellings to 2,500	1.16

Page	Policy/ Para	Recommended Change	Report Ref
		<del>dwellings over the period 2006 to 2026. This would result in the annual average increasing from 112 dpa to 125 dpa. It is important to note that the original figure was derived from urban potential work carried out by Surrey County Council and the 11 Surrey Districts and boroughs; and did not rely on the allocation of additional land. The Secretary of State's Proposed Changes to the SEP allocate to Tandridge 2,500 dwellings over the period 2006 to 2026, an annual average of 125 dwellings.</del>	
32	12.3	<i>In the first sentence:</i> ...previously developed land within the <del>urban built up</del> areas, Larger Rural Settlements and Green Belt Settlements.	6.20
33	<b>12.7</b>	<i>Add wording to end of paragraph:</i> <del>Following the adoption of this Core Strategy the Council will undertake during 2009 a Strategic Housing Land Availability Assessment (SHLAA) to identify sites with the potential for housing, assess their housing potential and assess when they are likely to be developed. The results of the SHLAA will inform the Site Allocations DPD.</del>	6.22
33	12.8	<del>The Housing Background Paper shows that in Within the first five year period there will be a more than adequate supply of deliverable sites (that is sites with unimplemented planning permissions and sites under construction) to meet the requirement. The requirement for the five year period will be 545 dwellings. This is based on a residual rate which after one year of completions (2006-2007) has dropped from 125dpa to 109 dpa. The supply over the same period will be 842 dwellings, so that aAt the end of the first five year period there will be a surplus over requirement of 297 some 527 dwellings.....</del>  <i>NB: Consequential changes required to Housing Trajectory at Annex 4.</i>	1.16
33	<b>12.9</b>	<del>For the second five year period the Council must identify sufficient developable sites. The Core Strategy is not required to identify sites; this will be carried out through a subsequent Site Allocations Development Plan Document. Nevertheless it is still essential at this stage to know if sufficient land is likely to be available. The Housing Background Paper explains that windfall sites comprise a significant part of the supply. From 2001/02 - 2006/07 some 78% of all completions were from windfall sites and the annual average supply was 270 dpa. But what is particularly significant is that in each of those years the number of dwellings built on windfall sites actually exceeded the Structure Plan annual requirement of 141dpa and also the SEP rate of 125dpa. The completions on allocated sites only arose because of sites being developed that had been allocated many years before. The policy indicates that sufficient developable sites will be identified. The Council is</del>	6.18

Page	Policy/ Para	Recommended Change	Report Ref
		<u>confident that the supply will not only meet the South East Plan requirement but that there will continue to be an excess of supply year on year.</u>	
33	<b>12.10</b>	<p><i>Delete all except last sentence:</i></p> <p><u>Again, Annual monitoring will be crucial in maintaining the supply of housing land. The Housing Trajectory at Annex 4 is based on previous rates and therefore does not take into account any allocations to be identified in the Site Allocations Development Plan Document. The Trajectory is only a "snapshot" of the situation at any one time. The Trajectory will be updated yearly in the Annual Monitoring Report and will assist in monitoring the supply against the requirement.</u></p>	6.18 & 1.16
34	12.12	The HCS indicates that there will be sufficient potential within the <u>urban built up</u> areas ... in the <u>urban built up</u> areas and protecting the Green Belt. Therefore any required allocations will be identified using a sequential approach: firstly previously developed land in the <u>urban built up</u> areas,...	6.20
34	12.13	<p><i>In the last sentence:</i></p> <p>...development to the <u>urban built up</u> areas,...</p>	6.20
34	<b>12.14</b>	<p>Notwithstanding the confidence the Council has regarding <u>the continuing rates of windfall development, the reducing residual requirement and consequent reducing need for allocations, a more than adequate supply of deliverable housing land</u> there needs to be contingency arrangements...</p>	6.18
34	<b>12.15</b>	<p><i>Add this ¶ to the end of ¶ 12.14.</i></p> <p><i>Delete last two sentences.</i></p>	6.18
34	<b>12.17</b>	<i>Delete paragraph.</i>	6.21
35	<b>CSP 12</b>	<p><i>In the second paragraph:</i></p> <p><u>The Council will identify has identified sufficient ... and will identify a further ... the Housing Trajectory; however, if it is not possible to identify sufficient sites for the first five years and years 6-10 the Council will take into account a windfall allowance.</u></p> <p><i>In the third paragraph:</i></p> <p><u>...directed to the <u>urban built up</u> areas and to land in sustainable locations immediately adjoining the <u>urban built up</u> areas as shown on the Key Diagram.</u></p>	6.18 & 6.20
36	<b>13.1</b>	<p><i>Add at beginning:</i></p> <p><u>The evidence base available to the Council was only sufficient to prepare an interim and temporary holding policy to meet the Core Strategy's spatial objectives. The Council will produce as soon as possible an Affordable Housing DPD containing a new, updated policy which will be based on robust and credible evidence, particularly that concerning the economic viability of development at specified thresholds and targets.</u></p>	9.5

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37	<b>13.4</b>	<p><i>Delete first two sentences.</i></p> <p><i>In third sentence:</i></p> <p>It will therefore be necessary ...</p> <p><i>Last sentence:</i></p> <p>... see Section 7 <u>8</u> of the ...</p> <p><i>Add wording to end of paragraph:</i></p> <p><u>The level of need and annual target will be kept under review by carrying out reviews of the SHMA. If necessary any review of the target, thresholds or site requirements will need to be considered as part of an Affordable Housing DPD or through a review of this Core Strategy.</u></p>	9.5
38	<b>13.7</b>	<i>Delete.</i>	9.8
38	<b>13.9</b>	<i>Delete.</i>	9.8
38	<b>13.10</b>	<p><i>In the third sentence:</i></p> <p>The percentage requirements should not be regarded as being immovable; the requirements <del>is are</del> "up to" the particular percentage and are a target to aim at.</p> <p><i>Delete the last three sentences.</i></p>	9.5 & 9.6
38	<b>13.11</b>	<p><i>Delete ¶ text and replace with:</i></p> <p><u>The Council may require that up to 75% of affordable housing on a site will be social rented accommodation in as many cases as possible with the remaining 25% being intermediate affordable housing. However it is recognised that without external funding this may not always be possible, therefore developers and Registered Social Landlords will be asked to look at a number of options in the following order:</u></p> <ul style="list-style-type: none"> <li data-bbox="453 1522 1302 1781">• <u>Free land: In addition to free, serviced land, an amount of further subsidy is also likely to be needed to obtain 75% affordable rented. This will be requested from the developer in the first instance. However, where there are proven development difficulties, some grant assistance may be considered. The onus will be on the developer to show, on an 'open book' basis why the proposed scheme is not viable without some form of public subsidy.</u></li> <li data-bbox="453 1848 1302 1971">• <u>Maintaining the percentage of affordable housing but providing some cross subsidy from shared ownership units to the social rented units. Consequently a reduced amount of additional public subsidy may be required.</u></li> <li data-bbox="453 2028 1302 2064">• <u>There will be situations where it will be difficult to</u></li> </ul>	9.8

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		<p><u>deliver the Council's desired mix of properties on site. For example if a site is only suitable for high density development and the provision of houses with gardens would mean best use of the land is not achieved.</u></p> <ul style="list-style-type: none"> <li>○ <u>There will be a presumption that affordable housing will be provided on the development site, however in some circumstances (including the above) the Council may accept an off site contribution on another site provided by the developer; such alternative site may trigger a requirement for affordable housing itself, such a requirement will be on top of the alternative site provision. The Council will retain the discretion to accept such alternative provision, particularly having regard to the need to contribute to mixed communities.</u></li> <li>○ <u>If an alternative site is not available and the Council and the developer both consider that it would be preferable that a financial contribution should be made towards affordable housing provision on another site within the District, the Council will require the developer to enter into a legal agreement to secure that provision. The financial contribution will be broadly equivalent in value to the on-site provision.</u></li> </ul>	
38	<b>13.12</b>	<i>Make this ¶ a sub-bullet point under 13.11.</i>	9.8
39	<b>CSP 14</b>	<p><i>Insert the following after the policy title and before the first ¶:</i></p> <p><u>This is an interim holding policy pending the adoption of a substitute policy in an Affordable Housing DPD. Annex 5 should be read in conjunction with this policy.</u></p> <p><i>Delete the third ¶ and the succeeding four bullet points and substitute the following:</i></p> <p><u>In order to maximise the supply of affordable housing the Council will require:</u></p> <ul style="list-style-type: none"> <li>• <u>on sites within the built up areas of 15 units or more or sites of or greater than 0.5 hectare; and</u></li> <li>• <u>on sites within the rural areas (see Annex 5) of 10 units or more</u></li> </ul> <p><i>that up to 34% of the dwellings will be affordable.</i></p>	9.5, 9.6, 9.7 & 9.9
39	13.13	<del>It is only on sites <u>outside</u> the settlements where affordable housing can be retained in perpetuity.</del>	1.16
40	<b>CSP 15</b>	<p><i>In the first ¶:</i></p> <p><u>... closely related to the defined rural settlements (see Annex 5) which would ...</u></p> <p><i>In the third bullet point:</i></p>	9.10

Page	Policy/ Para	Recommended Change	Report Ref
		<ul style="list-style-type: none"> <li>The housing would be justified by a <u>Parish or settlement</u> housing needs survey;</li> </ul>	
40	<b>CSP 16</b>	<p>... allocate land within <del>the Larger Rural Settlements and Green Belt</del> <u>defined rural</u> settlements to provide affordable housing in perpetuity to meet local needs. The allocation of land <u>and the definition of individual rural settlements</u> will be ...</p>	9.11
41	<b>13.20</b>	<p><i>Insert the following after the first sentence:</i></p> <p><u>In addition, the East Surrey Strategic Housing Market Assessment identifies a greater need to provide for Extra Care Housing over a 3 year period. There is concern that this type of housing will not be delivered within the first 10 years of the plan as housing development taking place over that period will be made up of existing consents, windfall sites (based upon historic completions) and identified sites with the Urban Capacity Study. None of the existing consents are for Extra Care Housing and few sites suitable for such development are likely to come forward. Therefore the Council will consult with service providers to facilitate the provision of such housing in accordance with the acknowledged need.</u></p>	9.12
42	<b>CSP 17</b>	<p><i>Add at the end of the first ¶:</i></p> <p><u>... , as set out in future Housing Need Surveys and Strategic Housing Market Assessments.</u></p> <p><i>In the second ¶:</i></p> <p>The Council will encourage the provision of housing for the elderly and for people with special needs, <del>(including Extra Care Housing)</del> where appropriate whilst avoiding an undue concentration in any location.</p> <p><i>Delete the last sentence of the second ¶.</i></p>	9.13 & 9.12
42	<b>New Policy</b>	<p><i>Insert new policy after CSP 17:</i></p> <p><b><u>Extra Care Housing</u></b></p> <p><u>The Council will, through the allocation of sites and/or granting of planning consents, provide for the development of at least 162 units of Extra Care Housing in the period up to 2016 and additional units in the period 2017-2026 following an updated assessment of need. In identifying sites and/or determining planning applications, regard will be had to:</u></p> <ul style="list-style-type: none"> <li><u>The need for each site to accommodate at least 50 Extra Care Housing units;</u></li> <li><u>The Extra Care Housing Model in the East Surrey Extra Care Housing Strategy in respect of the provision of</u></li> </ul>	9.12

Page	Policy/ Para	Recommended Change	Report Ref
		<p>services and facilities (and any further guidance received from Surrey County Council):</p> <ul style="list-style-type: none"> <li>Sustainability – sites should be sustainable by virtue of their location and there will be a preference for sites within defined settlements, but where such sites are not available regard will be had to the potential for development to be self-contained to reduce travel requirements and the availability of public transport;</li> <li>The priority will be for the re-use of previously developed land. Greenfield sites will only be acceptable following allocation in the LDF; and</li> <li>The potential to co-locate a nursing/residential care home on the site where there is an acknowledged need.</li> </ul> <p>The Council will also work with its partners, Surrey County Council, Reigate &amp; Banstead Borough Council, Surrey Supporting People and the Primary Care Trust in identifying suitable sites and securing the provision of schemes.</p> <p>The Council will support suitable proposals notwithstanding that such developments may result in or exacerbate an excess of housing development of housing development against South East Plan requirements.</p>	
43	<b>CSP 18</b>	<p><i>In the second ¶:</i></p> <p>Allocated sites will be small, appropriate to the size of site and availability of infrastructure and services to accommodate a maximum of 5 or 6 caravans.</p>	9.15
44	<b>CSP 19</b>	<p><i>In the second ¶:</i></p> <p>Allocated sites will be small appropriate to the size of site and availability of infrastructure and services to accommodate a maximum of 3 mobile homes plus 3 touring caravans and associated storage/maintenance area.</p>	9.15
45	14.1	<p><i>Insert new ¶ before 14.1:</i></p> <p>Infrastructure and services cover a whole range of items that can include utility services such as highways, public transport, water supply, gas, electricity, sewerage disposal; public services such as the fire service, police service; social services such as community facilities, sports centres and open space; and green infrastructure as well as those specifically mentioned above. Some services, for example further education and larger hospitals are not generally provided on a District basis.</p>	1.16
45	<b>14.1</b>	<p><i>Add to end of ¶:</i></p> <p>The Council will work with service, infrastructure providers and community stakeholders to monitor the provision of services and infrastructure in relation to the growth of development and to meet any identified needs.</p>	10.3

Page	Policy/ Para	Recommended Change	Report Ref
45	<b>14.3</b>	... Infrastructure Levy through a Supplementary Planning Document which would ...	10.2
45	14.7	<i>Delete.</i>	1.16
45	14.9	<i>Delete.</i>	1.16
45	14.9	<p><i>Insert new ¶ after 14.9:</i></p> <p><u>For the avoidance of doubt, in transport terms the Council will be looking to demand management measures and sustainable travel initiatives to address transport issues associated with all new development; new road building will only be considered as a last resort after all other measures have been implemented.</u></p>	1.16
46	<b>CSP 20</b>	<p><i>Insert new ¶ after first ¶:</i></p> <p><u>Planning permission will only be granted for developments which increase the demand for off-site services and infrastructure where sufficient capacity exists or where extra capacity can be provided, if necessary through developer funded contributions.</u></p> <p><i>In the second ¶:</i></p> <p>... as described in paragraph B47 of ODPM Circular ...</p> <p><i>Delete the third ¶.</i></p> <p><i>In the fourth ¶:</i></p> <p>... Infrastructure Levy through a Supplementary Planning Document which will to ensure a more ...</p>	10.2 & 10.3
47	<b>15.4</b>	<p>East Grinstead, within Mid Sussex, has been identified in the West Sussex Structure Plan and <u>the South East Plan</u> for significant growth to be accompanied by a package of both highway and public transport related improvements including a potential relief road. <u>A number of options for relief road have been proposed, including one that would join The preferred option for the relief road in Mid Sussex's emerging Local Development Framework (LDF) extends into Surrey joining the A264 within Tandridge to the west of Felbridge village.</u> This is shown notionally on the Key Diagram of this Core Strategy. <u>Mid-Sussex District Council's LDF is based on a Sustainability Appraisal which tests a number of relief road options.</u> Whilst <u>t</u><u>he Council is opposed to any new road in Tandridge, this relief road might be acceptable in the circumstances set out below where it would constitute inappropriate development within the Green Belt.</u> <u>Mid-Sussex District Council is testing and carrying out a Sustainability Appraisal of the options</u> <u>Therefore if a relief road is to be acceptable within the Tandridge Green belt, very special circumstances must exist to justify the route.</u> In particular it</p>	10.4

Page	Policy/ Para	Recommended Change	Report Ref
		<p>must be clearly demonstrated that:</p> <p class="list-item-l1">a. The growth of East Grinstead is planned in the most a sustainable way possible with significant weight attributed to Mid Sussex District Council's LDF in this regard;</p> <p class="list-item-l1">b. The requirement for a relief road is part of a package of measures;</p> <p class="list-item-l1">c. Appropriate mitigation measures are implemented having regard to the interests of residents/businesses and the environment in Tandridge; and:</p> <p class="list-item-l1">d. There is no other better alternative non-Green Belt route. Significant weight should be attributed to Mid Sussex District Council's LDF in this regard.</p> <p><u>The question as to whether the relief road would be "washed over" by the Green Belt or excluded from it will be resolved appropriately and expeditiously, either through a planning application or through a future DPD.</u></p>	
48	15.5	<p><i>Delete existing ¶ and replace with:-</i></p> <p><u>The Council will introduce new parking standards that will have regard to the need to encourage alternative modes of transport to the car, the efficient use of land and expected car ownership in particular locations, existing parking problems and the need to ensure that on-plot and on-street parking does not detract from the design of the development or the wider area or adversely affect highway safety.</u></p>	10.5
48	15.11	<p><i>Add new ¶ after 15.11:</i></p> <p><u>The Council will encourage alternative modes of transport, in particular in rural areas, by supporting rural transport initiatives such as those promoted by the East Surrey and East Sussex Rural Transport Partnerships, where resources are available through project funding and grant aid. Where resources allow the Council will continue to work with the Highway Authority and the Train Operating Companies to provide cycle racks in the town centres and at railway stations.</u></p>	10.5
49	CSP 21	<p><i>Delete the first bullet point.</i></p> <p><i>In the third bullet point:</i></p> <p><i>... and <del>ear</del> vehicle and other parking standards.</i></p> <p><i>Delete second ¶ (commences with words: The Council will require transport assessments ...) and its footnote.</i></p> <p><i>Delete the third ¶.</i></p>	10.5

Page	Policy/ Para	Recommended Change	Report Ref
		<i>Delete the last 1.</i>	
50	<b>Title</b>	<b>16 Cultural Services, Community ... Facilities and Services</b>	10.6
51	<b>CSP 22</b>	<p><i>In the title:</i></p> <p><b>Cultural Services, Community ... Facilities and Services</b></p> <p><i>In the first 1:</i></p> <p>Existing <del>cultural services</del>, community ... facilities and services (see <u>Glossary</u>), and ...</p> <p><i>Delete the third and fourth 1s and insert:</i></p> <p><u>The loss of open space, sport and recreation facilities is dealt with in national planning policies (PPG17). For the loss of other community facilities and/or services as defined in the Glossary, the principles of assessment set out in those national planning policies (PPG17) will be operated, and the exact details will be set out in the Development Control DPD.</u></p>	10.6 & 10.7
52	<b>17.6</b>	... yards being developed. <u>In order to guide the future development and/or infilling of the Hobbs Industrial Estate the Council, in conjunction with the site owners, will prepare a site brief.</u>	11.2
52	<b>17.7</b>	... New developments should be laid out to include the provision of appropriate utility services, including telecommunications and the provision of fibre optic cables.	11.1
53	<b>17.8</b>	... such a marketing exercise. <u>A detailed policy will be set out in the Development Control DPD.</u>	11.2
53	<b>17.9</b>	... constraints being considered. <u>The Council will continue to operate saved policy RE6 "Conversion of buildings in the Green Belt outside the settlements" of the Tandridge District Local Plan 2001 until a new detailed policy is adopted in the Development Control DPD.</u> Commercial development ...	11.2
53	17.10	... reduces need to travel). It <del>will seek to retain a proportion of the existing employment floorspace and will allow for growth</del> ...	1.16
54	<b>CSP 23</b>	<p><i>Delete criterion b), d), g) and h)</i></p> <p><i>In criterion c):-</i></p> <p>... commercial purposes (subject to environmental, <u>farm viability</u>, traffic and amenity considerations), <u>(the Council's preference for the re-use of such buildings is for economic development purposes)</u>. Further details will be set out in the Development Control DPD.</p> <p><i>In criterion e):-</i></p>	11.1 & 11.2

Page	Policy/ Para	Recommended Change	Report Ref
		<p>... the urban built up areas, ... alternative uses. <u>Further details will be set out in the Development Control DPD.</u></p>	
56	<b>18.8</b>	<p><i>Amend paragraph as follows:</i></p> <p><del>No change is proposed to the existing identified Primary Shopping Areas. The existing Primary Shopping Areas as shown on the Tandridge District Local Plan 2001 saved Proposals Map under policy SH2 will be reviewed in the Development Control DPD in accordance with the definitions of the types of location and other relevant matters set out in PPS6.</del></p> <p>.....<u>The following policy proposes a hierarchy of town and other centres. The following hierarchy is proposed:</u></p> <ol style="list-style-type: none"> <li>1. Caterham Valley and Oxted</li> <li>2. Warlingham and Lingfield</li> <li>3. Caterham Hill</li> <li>4. Whyteleafe</li> <li>5. Other local centres and villages</li> </ol>	12.1 & 12.3
57	<b>CSP 24</b>	<p>... and Oxted town centres by:-</p> <p><del>a) Working with its partners (such as Surrey County Council) to undertake specific improvements to the physical environment and increase the range of services and facilities. In particular the Council will support bids for regional funding following 'Health checks' and will actively pursue the redevelopment of:</del></p> <ul style="list-style-type: none"> <li>• <u>the former Rose &amp; Young site in Croydon Road, Caterham</u></li> <li>• <u>the gasholder site and adjoining land in Oxted</u></li> </ul> <p><u>The above two sites would be suitable for a number of uses appropriate to a town centre, but would also be suitable for residential use. The Council will therefore be prepared to consider proposals on their merits. Retail proposals would, however, need to be assessed in accordance with the advice in PPS6.</u></p> <p><i>Delete criteria b), c), d) and e).</i></p> <p><u>The existing Primary Shopping Areas in Caterham Valley and Oxted as shown on the Tandridge District Local Plan 2001</u></p>	12.1, 12.3 & 12.3

Page	Policy/ Para	Recommended Change	Report Ref
		<p><u>saved Proposals Map under policy SH2 will be protected, and will be reviewed in the Development Control DPD along with the detailed criteria to achieve this protection.</u></p> <p><u>The following hierarchy of centres has been identified:</u></p> <ol style="list-style-type: none"> <li><u>1. Caterham Valley and Oxted</u></li> <li><u>2. Warlingham and Lingfield</u></li> <li><u>3. Caterham Hill</u></li> <li><u>4. Whyteleafe</u></li> <li><u>5. Other local centres and villages</u></li> </ol> <p><u>The Council will seek to protect the role of Warlingham, Lingfield, Caterham Hill, Whyteleafe and other local centres and villages, which will be defined in the Development Control DPD along with a detailed policy to achieve this objective, and other shopping parades (including in Smallfield) by:</u></p> <p><i>Delete criteria f) and g).</i></p>	
58	19.1	... issues that need specific attention reference.	1.16
58	<b>19.3</b>	<i>Delete.</i>	11.5
58	<b>19.6</b>	<p><i>Delete the third sentence.</i></p> <p><i>Add at end of ¶:</i></p> <p><u>The Council will encourage appropriate development in rural settlements that would assist in creating thriving and sustainable rural communities.</u></p>	11.5
58	<b>19.7</b>	<p><i>In first sentence:</i></p> <p>... issues within particular villages areas.</p> <p><i>Add at end of ¶:</i></p> <p><u>The Council will work with its partners in the Surrey Rural Partnership to champion rural needs and to secure additional funding.</u></p>	11.5 & 1.16
59	<b>CSP 25</b>	<i>Delete.</i>	11.5
60	20.3	... Each Core Strategy policy has policies have an indicator or indicators and each policy has policies have been linked to ...	1.16
		<b>Changes to Annexes</b>	
61	<b>Annex 1</b>	<i>Delete (text with amendments to be inserted into CSP 1).</i>	6.30

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63	Annex 2: CSP 1	<p><i>In first Indicator:</i>  Percentage of housing development on previously developed land in <u>urban built up</u> areas</p> <p><i>In Target:</i>  <u>90% 2006 - 2011 - 95%</u>  <u>2011 - 2016 - 90%</u>  <u>2016 - 2021 - 70%</u>  <u>2021 - 2026 - 60%</u>  (average per annum) to be on PDL <del>(compared to Government target of 60%)</del></p> <p><i>In Delivery Mechanism:</i>  ... the Green Belt boundaries, as they may be revised.</p>	13.3
63	Annex 2: CSP 2	<p><i>In Indicator:</i>  Renewable energy capacity installed by type <u>to achieve the required % in carbon dioxide saving</u></p> <p><i>In Target:</i>  1-9 units 10%  10+ units 20%  500m<sup>2</sup> 10%</p> <p><i>Add to both Comments:</i>  <u>Monitored annually against all development completions within each year.</u></p> <p><i>Additional Indicator, Target and Comment:</i>  <u>The percentage of dwellings meeting Code level 3 or greater and the percentage of commercial units, with a floor area of 500m<sup>2</sup> or greater, meeting at least the BREEAM 'very good' standard.</u></p> <p><u>100% of residential units meet Code level 3 or greater.</u>  <u>100% of commercial units with a floor area of 500m<sup>2</sup> or greater meet the BREEAM 'very good' standard or better.</u></p> <p><u>Local Indicator. Monitored annually against all development completions within each year. This is not a requirement and so the percentage target could be less.</u></p>	13.3
64	Annex 2: CSP 3	<i>Delete.</i>	13.3
65	Annex 2: CSP 4	<i>Delete first Indicator, Target and Comment.</i> <i>In second Indicator, Target and Comment:</i>	13.3

Page	Policy/ Para	Recommended Change	Report Ref
		<p>Percentage of <u>new</u> dwellings per annum meeting <u>to incorporate</u> "Lifetime Homes" standards.</p> <p><u>None identified 100% of new dwellings</u></p> <p><u>... Monitored annually against all housing completions within each year. This is not a requirement and so the percentage target could be less.</u></p>	
65	<b>Annex 2: CSP 5</b>	<p><i>In Target:</i> No adverse change from 2006 levels <u>year on year</u></p>	13.3
66	<b>Annex 2: CSP 6</b>	<i>Delete third Indicator, Target and Comment.</i>	13.3
68	<b>Annex 2: CSP 9</b>	<i>Delete.</i>	13.3
68	<b>Annex 2: CSP 10</b>	<i>Delete Indicator, Target and Comment.</i>	13.3
69	<b>Annex 2: CSP 11</b>	<p><i>Delete Indicator, Target and Comment.</i></p> <p><i>In Delivery Mechanism, delete last three 3 bullet points.</i></p>	13.3
69	<b>Annex 2: CSP 12</b>	<p><i>Delete Target and insert:-</i></p> <p><u>At least 625 dwellings to be delivered by 31<sup>st</sup> March 2013; at least a further 625 dwellings by 31<sup>st</sup> March 2018; at least a further 625 dwellings by 31<sup>st</sup> March 2023; and at least a further annual average of 125 dwellings per annum to the end of the Plan period</u></p> <p><i>In Delivery Mechanism delete 4<sup>th</sup> bullet point (Housing Delivery Action Plan).</i></p>	13.3
70	<b>Annex 2: CSP 13</b>	<p><i>Delete second Indicator, Target and Comment.</i></p> <p><i>In Delivery Mechanism, delete the fourth bullet point (Housing Delivery Action Plan).</i></p>	13.3
70	<b>Annex 2: CSP 14</b>	<p><i>In first Target:-</i></p> <p><u>50 affordable housing units per year will be delivered, with a total of 250 being delivered by 2012</u></p> <p><i>In the second Target:</i></p> <p><u>345%</u></p>	13.3
72	<b>Annex 2: New policy</b>	<p><b><u>Extra Care Housing</u></b></p> <p><b><u>Spatial Objectives:</u></b></p> <p><u>Provision of sufficient and adequate housing (sustainably located and constructed) to meet the needs of all sections of</u></p>	13.3

Page	Policy/ Para	Recommended Change	Report Ref
		<p><u>the community, including affordable dwellings, retirement accommodation, homes for young people, sites for Gypsies/Travellers and Travelling Showmen and homes for those with special needs.</u></p> <p><b><u>Indicator:</u></b>  <u>Number of Extra Care Housing units constructed by 2016</u></p> <p><b><u>Target:</u></b>  <u>At least 162 units (50% public sector, 50% private sector) by 2016. Further target for 2017-2026 to be identified following updated Needs Assessment to be approved by the Council.</u></p> <p><b><u>Comment:</u></b>  <u>Local Indicator</u></p> <p><b><u>Delivery Mechanism:</u></b></p> <ul style="list-style-type: none"> <li>• <u>Through the development control process</u></li> <li>• <u>By monitoring the supply and demand for Extra Care Housing in the Annual Monitoring Report</u></li> <li>• <u>By the preparation of a Strategic Housing Land Availability Assessment</u></li> <li>• <u>By allocating sites through a Site Allocations DPD</u></li> </ul>	
73	<b>Annex 2: CSP 20</b>	<p><i>In Spatial Objectives:</i>  ... to accompany new <del>housing</del> development</p> <p><i>Delete Target and insert:</i>  <u>All development (excluding minor and household) to include a contribution towards infrastructure and services to be monitored on a yearly basis.</u></p>	13.3
74	<b>Annex 2: CSP 21</b>	<p><i>In the first Target:-</i>  <u>None identified 80% of new residential development per annum to be within 30 minutes of public transport time of key services/employment/retail</u></p> <p><i>In the second Target:</i>  <u>None identified 90% of new retail, office and leisure development to be in town centres</u></p> <p><i>In the third Indicator:</i></p>	13.3

Page	Policy/ Para	Recommended Change	Report Ref
		<p>... located within the <u>urban built up areas</u> which ...</p> <p><i>In Delivery Mechanism, delete the last bullet point.</i></p>	
75	<b>Annex 2: CSP 22</b>	<p><i>In Spatial Objectives:</i></p> <p>... accompany new <u>housing development</u></p> <p><i>Delete first Indicator, Target and Comment.</i></p> <p><i>In second Target:-</i></p> <p><del>None identified</del> <u>No loss in extent or number of playing fields/sports/open space facilities and no loss of community/recreational facilities in any year</u></p>	13.3
76	<b>Annex 2: CSP 24</b>	<p><i>Delete first and second Indicator, Target and Comment.</i></p> <p><i>Add new indicator, Target and Comment:</i></p> <p><u>The redevelopment of key sites in the town centres</u></p> <p><u>The former Rose and Young site to be redeveloped by 2013; and the gasholder and adjoining land to be redeveloped by 2013</u></p> <p><u>Local Indicator</u></p>	13.3
76	<b>Annex 2: CSP 25</b>	<i>Delete.</i>	13.3
77	<b>Annex 3</b>	<i>Delete (text to be inserted in Section 5).</i>	6.31
79-81	<b>Annex 4</b>	<p><i>Amend housing trajectory. In particular:</i></p> <p><i>Delete the last two columns of the table (residual figures).</i></p> <p><i>Bring the remaining table up to date in line with the figures produced by the Council during the Examination (include 2007/08 figures) and to reflect those in this Report.</i></p> <p><i>Bring the chart similarly up to date to include 2007/08 figures and those in this Report.</i></p> <p><i>Delete the green residual annual average line on the chart.</i></p> <p><i>Remove any element of windfall development from the HCS from the expected completions for small and medium sites.</i></p>	14.1
82/83	<b>Annex 5</b>	<p><i>In secondary heading above table at top of page 82:-</i></p> <p>Parishes and settlements within which the rural thresholds apply <u>(CSP 14):</u></p> <p><i>Title to list at bottom of page 82:-</i></p> <p>Settlements where Rural Exceptions sites may be released</p>	9.10 & 1.16

Page	Policy/ Para	Recommended Change	Report Ref
		(CSP 15):  <i>Insert <u>Smallfield</u> in the above list of settlements.</i>	
83	Annex 5	<i>Insert as fourth ¶ under Affordable Housing definitions:</i>  <u>Affordable Housing should include provisions that it will remain at an affordable price for future eligible households or, if those restrictions are lifted, for the subsidy to be recycled for alternative affordable housing provision.</u>	9.9
85	Annex 6	<b>Community, Sport and Recreation Facilities and Services:-</b> Facilities or services for the community, including open space, sport and recreational facilities, community/village halls or buildings, shops, pubs, and children's play areas.  <b>Strategic Housing Land Availability Assessment</b>  <i>Delete Housing Delivery Action Plan definition.</i>  <i>Delete Planning Gain Supplement definition.</i>	10.6 & 1.16
87/88	Annex 7	<i>List of Local Plan policies to be superseded to be amended (see revised Annex 7 at the end of this Schedule).</i>	14.2
89	Key Diagram	<i>In the Key:</i>  <u>Urban Built up Areas/</u> <u>Settlements</u>  <i>On the Diagram:</i>  <i>Use different colours to distinguish between:- the built up areas, Woldingham, and the Larger Rural Settlements.</i>  <i>Delete Green Belt Settlements</i>  <i>At the bottom of the Diagram:</i>  <i>Indicative <u>line</u> position of East Grinstead Relief Road</i>  <i>Replace the arrow showing the indicative position of the East Grinstead Relief Road with a star.</i>	1.16, 6.36 & 10.4

**Annex 7 - List of Tandridge District Local Plan policies to be superseded by Core Strategy**

RE1	<u>Green Belt Boundary</u>
RE3	<u>Housing Development in the Green Belt Settlements</u>
RE4	<u>Commercial and Community Facilities in the Green Belt Settlements</u>
RE5	<u>Dormans Park and Domewood</u>
RE14	<u>Redhill Aerodrome</u>
RE15	<u>Landscape Character</u>
RE16	<u>Areas of Outstanding Natural Beauty</u>
RE17	<u>Areas of Great Landscape Value</u>
RE18	<u>Areas of Local Landscape Significance</u>
BE2	<u>Development on the Edge of Built-up Areas and Villages</u>
BE6	<u>Succombs Hill and Landscape Road</u>
BE9	<u>Wooded Hillsides</u>
BE11	<u>Land at Brook and Glebe Fields, Limpsfield</u>
BE16	<u>Crime Prevention and Design</u>
BE17	<u>Access for the Disabled</u>
BE19	<u>Play Areas on New Developments</u>
NE1	<u>Proposals Affecting Sites Valuable for Nature Conservation</u>
NE2	<u>Sites of Special Scientific Interest</u>
NE3	<u>SNCIs and RIGS</u>
NE4	<u>Potential SNCIs</u>
NE5	<u>Ancient Woodlands</u>
NE6	<u>Local Nature Reserves and Areas Managed as Non-Statutory LNRs etc</u>
NE7	<u>Protected Species</u>
NE8	<u>The Wider Environment</u>
NE9	<u>Development Related Enhancement</u>
NE10	<u>Woodlands and Hedgerow</u>
HE1	<u>Listed Buildings</u>
HE2	<u>Buildings of Character</u>
HE3	<u>Development in Conservation Areas</u>
HE4	<u>Historic Parks and Gardens</u>
HE5	<u>Ancient Monuments and County Sites of Archaeological importance</u>

HE6	Development in Areas of High Archaeological Potential
HE7	Archaeological Monitoring of Development Sites
HO6	Infrastructure and Service Provision
HO7	Dwellings for Small Households
HO9	Affordable Housing
HO10	Rural Exception Housing
HO11	Housing for People with Disabilities
HO12	Housing for the Elderly
HO15	Sites for Travelling Show People
EM1	Safeguarding Existing Industrial and Commercial Land
EM2	Existing Industrial and Commercial Land Use
EM4	Sites for Small Firms
EM5	New Employment Sites
EM7	Business Development in Oxted and Caterham Valley Town Centres
MO1	Accessibility of Development to Public Transport
MO2	Public Transport and New Development
MO3	Bus Access and New Development
MO4	Railways
MO6	Cycling and New Development
MO13	Movement and New Development
MO14	Parking
MO15	Company Transport Plans
CF1	Retention of Existing Community Facilities
RT1	Protection and Enhancement of Recreational Facilities
RT2	Protection of Playing Fields
EV1	Energy Conservation
EV2	Renewable Energy
EV3	Development in Flood Plains
EV4	Drainage and Sewerage of Foul and Surface Water
EV5	Water Supply
EV6	Water Quality
EV9	Light Pollution
EV10	Noise