

TANDRIDGE DISTRICT COUNCIL

Our Local Plan

Preferred Strategy

March 2017

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Foreword

I am delighted to introduce our preferred strategy for the Council's Local Plan, which sets out in detail how we intend to deliver our vision for the district up to 2033.

Tandridge is characterised by its openness, with Areas of Outstanding Natural Beauty and the highest proportion of Green Belt land in the country.

We want it to keep this character, while at the same time being a place where people from all walks of life have access to homes, jobs, education, leisure and health facilities and where the transport infrastructure meets the needs of the modern world.

Balancing these competing needs is not easy. We have worked hard to set out a strategy which will provide homes for people and the services to go with them, while protecting the distinctive nature of the area.

We believe a combination of a new garden village and some limited development of our urban and semi-rural areas is the right way forward, even though this could mean releasing a small amount (around 1%) of Green Belt land where there are exceptional circumstances to justify this.

This strategy does not set out in detail exactly where new development will take place, but provides the guiding principles by which those decisions will be taken in consultation with the people of Tandridge.

Councillor Martin Fisher
Leader of Tandridge District Council

1.0 Summary

- 1.1 Tandridge District Council is preparing a Local Plan which will set out a new development strategy for the district up to 2033. A Local Plan provides the opportunity for the district to build on its existing strengths while also addressing identified challenges by guiding the delivery of homes, providing for employment and setting policies which enhance the natural and historic environment. To achieve this, the Local Plan will allocate sites for housing, employment and open spaces and set out policies to be used in the assessment of planning applications.
- 1.2 So far, the Council has carried out two stages of consultation in accordance with Regulation 18 of the Town and Country Planning (Local Plan) (England) Regulations (2012), to help inform what the Plan should include. The Council is now at a stage where a preferred strategy for the Plan can be determined and which can respond to the issues and opportunities for the area, the evidence which has been gathered, the local needs which have been identified and the views of our communities and interested parties.
- 1.3 The Council has set out its Vision and Objectives for the District and these were consulted upon through the Local Plan: Issues and Approaches consultation (2015/16). These are refined in this document and have been amended in response to public consultation undertaken on the emerging Local Plan. The Issues and Approaches document also considered a number of high level strategic approaches for meeting development needs and the Council have consulted on those. The Local Plan: Sites Consultation (2016) sought views on the sites that stemmed from the current Housing and Economic Land Availability Assessment (HELAA), in the context of evidence which considered the landscape and ecological value of those sites as well as further refinement of an assessment of the Green Belt.
- 1.4 Using the information at hand and gathered to date, including the results of consultation, this paper recommends a preferred strategy for delivering development needs that will provide sustainable development, balance the competition for land-use between the economic, social and environmental aspects of the National Planning Policy Framework (NPPF) and meet the objectives identified for the Plan with particular focus on the areas of most concern to residents: protection of the important environment, preserving the Green Belt beyond the Plan period; providing new homes for families; increasing the availability of affordable housing; improving the existing infrastructure and ensure new infrastructure provision keeps pace with new development.
- 1.5 The paper considers the ability of the Plan to meet these requirements through a sustainable pattern of development and recommends that the preferred strategy should be one which meets development needs through:

- An infrastructure-led approach that ensures new development is capable of delivering infrastructure improvement to meet the needs of the existing and future population throughout the plan period;
 - allocating a strategic site capable of delivering development based on garden village principles, including a primary school and which facilitates the delivery of secondary school provision, primary health care facilities, highways improvements and employment space commensurate with the scale of housing;
 - the utilisation of previously developed land at densities appropriate to the character of the existing area and by utilising higher densities in close proximity to public transport;
 - the delivery of sustainable development through allocated sites on the edge of Tier 1 and 2 settlements and in locations supported by Neighbourhood Plans, by adjusting the Green Belt boundary where none of the purposes which define Green Belt are served and where exceptional circumstances are considered to exist;
 - Supporting economic growth through intensification and/or expansion of existing employment sites, where appropriate; and by allocating additional employment land in sustainable locations to support the local and rural economy.
- 1.6 This preferred strategy demonstrates that the Plan has been positively prepared with the objective of contributing to the achievement of sustainable development and balancing economic, social and environmental considerations.

2.0 Background

- 2.1 The Council has consulted on its Vision for the district and the Issues and Objectives for the Local Plan. It has consulted on a number of high level approaches for the delivery of housing and economic needs. The Council has also consulted on a number of sites submitted to the Council through the Housing and Economic Land Availability Assessment, 2016 (HELAA). These sites were submitted by landowners, or their representatives.
- 2.2 The way that the provision of new housing to meet population needs is calculated and how that housing is distributed has changed significantly since the Council adopted its Core Strategy in 2008. Indeed, the Core Strategy did not seek to meet population needs of the district within the district and the figure set out and used to guide the Core Strategy was a target that was determined regionally and reflected land capacity. In contrast, the National Planning Policy Framework (NPPF) requires districts to objectively assess their precise housing need, based on demographic change, population growth, market signals and household formation. Councils must seek to meet their development needs in full, recognising that some of the policies within the NPPF protect land from being developed and restricts the ability to meet all needs in full. If needs cannot be met in full it is for councils to set out how the unmet need will be provided.
- 2.3 The Local Plan should seek to meet development needs whilst ensuring that adequate infrastructure is provided to support it and that policies for the protection of the built and natural environment are properly taken into account. **This is not an either/or but has to be a balance between the three strands of sustainability set out in the NPPF; economic, social and environmental.**
- 2.4 The requirement for housing land within the district is significantly greater than for any other land use, or the approach taken in the Core Strategy. The Objectively Assessed Housing Need (OAN) for the district is 9,400 new homes in the period 2013 to 2033. The current housing supply is 1,702 (April 2016¹) units which already have planning permission and are expected to, or have already, come forward. The HELAA currently suggests that a further 295 houses could potentially come forward on previously developed land within the existing built-up areas. The Local Plan explores how the remaining requirement for homes and employment needs can be met, balancing the need to respect the policies within the NPPF for the protection of the built and

¹ The Council's understanding of the supply from current permissions and completions is updated annually through the Annual Monitoring Report.

natural environments, and to sustain and support both existing and future residents and businesses.

Total OAN	9,400
Current supply/permissions	1,702
Urban capacity (HELAA sites)	295
<i>Residual number of homes which would need to be planned for (subject to constraints)</i>	7,403

- 2.5 The Local Plan must give consideration to any unmet housing needs of other authorities. If, however, the Council is unable to meet its own housing and employment needs it will need to seek to provide for it elsewhere, in other districts, where possible.
- 2.6 The two consultations under Regulation 18 allowed the Council to gain a range of views and to consider the high level options from which to determine a preferred strategy that the final Local Plan will follow. To produce an effective plan a strategy now needs to be set out which represents the Council's approach to balancing the development needs with built and natural environmental constraints, whilst still supporting and sustaining our current and future residents and businesses. This needs to be a new approach and as stated earlier, the existing Core Strategy does not plan for meeting needs in full and places environmental constraint as a higher priority than the social and economic aspects of planning, which the NPPF require to be balanced in order to attain sustainable development.
- 2.7 In addition to numerous natural environmental constraints, the District is also in an area where Green Belt policy exists and 94%, some 23,300 hectares, is designated as such. The Green Belt is in place to perform a number of roles as detailed in NPPF paragraph 80. It is recognised that potential loss of Green Belt is one of the principal concerns of residents.
- 2.8 Green Belt policy is a significant constraint to development, as consistently restated by the Secretary of State for Communities and Local Government and government policy. Unless it can be demonstrated that the role of the Green Belt is outweighed by other relevant considerations, where exceptional circumstances are demonstrated, it presents a real challenge to the Council's ability to meet its development needs. Nevertheless, the Local Plan must ensure that it can justify how the Green Belt has been considered. Evidence that has been prepared and published in the Council's two-part Green Belt Assessment, shows that the vast majority of the land designated as Green Belt performs its role successfully and meets at least one of the purposes set out in the NPPF. Only a few areas were not found to be successful in fulfilling the role of Green Belt, but even in relation to these,

the Council would still need to demonstrate exceptional circumstances before any amendment to the boundary could be made.

- 2.9 In terms of exceptional circumstances, the Council has set out what factors it considers fundamental to testing whether they exist or not in Spatial Approaches Topic Paper: Sites Consultation (2016). The topic paper highlights the considerations that would be used to conclude whether the Green Belt boundary could be adjusted to assist with meeting housing needs.

Calverton Parish Council v Nottingham City Council [2015]

In this case Justice Jay set out a number of factors that the authority should consider when deciding whether exceptional circumstances existed. The factors he identified were:

- i. the acuteness/intensity of the objectively assessed need (matters of degree may be important);*
- ii. the inherent constraints on supply/availability of land prima facie suitable for sustainable development;*
- iii. (on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt*
- iv. the nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were altered);*
- v. the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.*

- 2.10 Further, The recent Housing White Paper, 'Fixing our Broken Housing Market', released in February 2017; also elaborates on what the Government considers might constitute exceptional circumstances and they are consulting on potential amendments to national policy. The Council will need to be mindful of the White paper, in plan-making.

Housing White Paper – Fixing our broken housing market (February 2017)

1.39 Authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including:

- making effective use of suitable brownfield sites and the opportunities offered by estate regeneration;
- the potential offered by land which is currently underused, including surplus public sector land where appropriate;
- optimising the proposed density of development; and
- exploring whether other authorities can help to meet some of the identified development requirement.

- 2.11 The consideration of exceptional circumstances should also be informed by an understanding of the Council's preferred strategy for the Local Plan so that the conclusion ensures the proper balance between development needs and a desire to maintain the Green Belt is achieved.

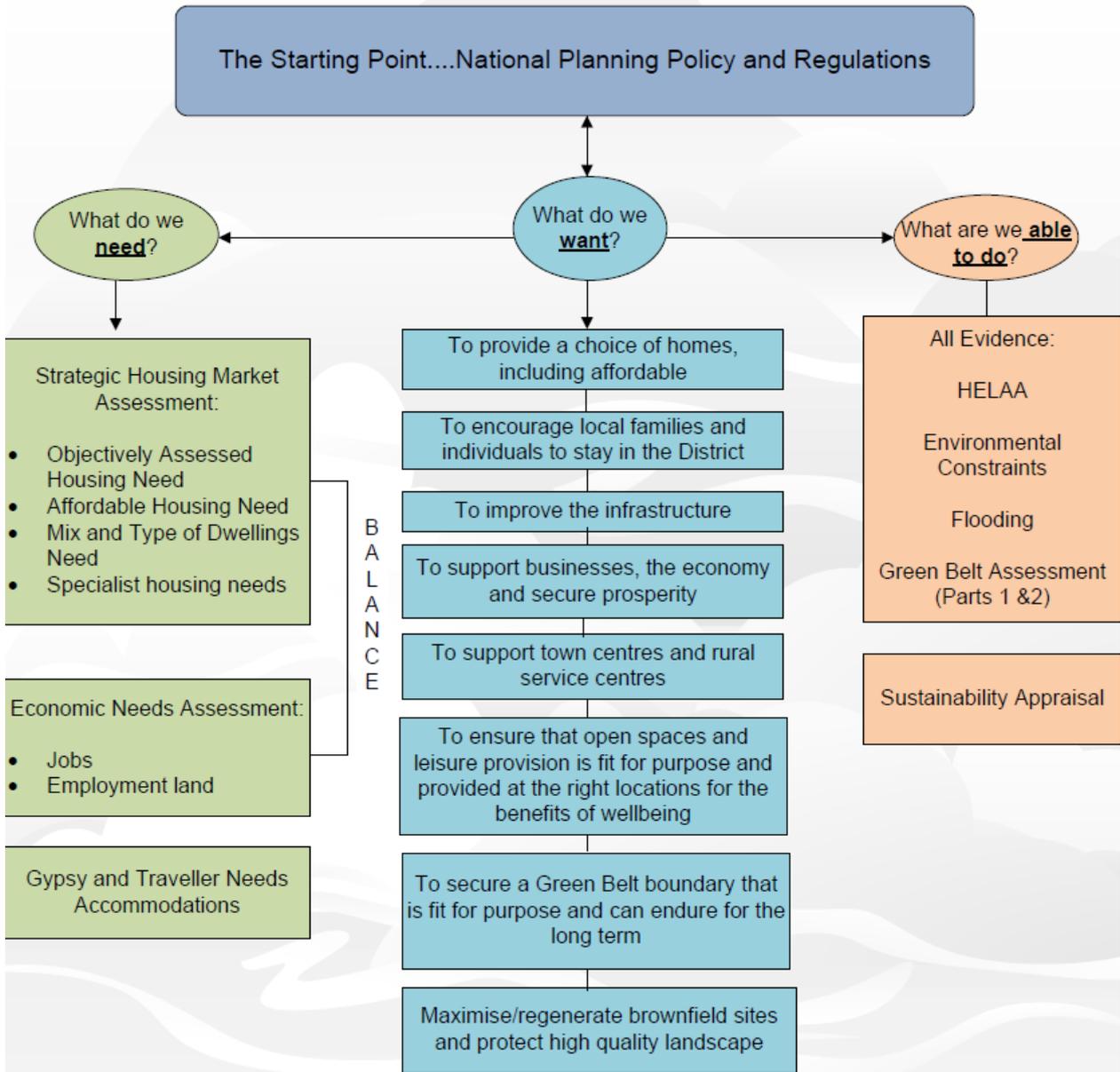
Vision, Objectives and a Preferred Strategy

- 2.12 The Council's preferred strategy for the plan should be one that responds to the Vision and Objectives for the overall Local Plan. This paper reflects on the key messages received through consultation, in particular the Issues and Approaches consultation (2015/16) and refreshes them in response to comments received and other relevant considerations, including the statutory requirements of the Plan and the duties of the Council in arriving at a completed document.
- 2.13 A preferred strategy is one that outlines, in general terms, the areas that will be considered for accommodating development and the approach to be taken on infrastructure, economic development and the natural environment. The preferred strategy will help to convey the Council's ambitions, and give direction to Council officers who will prepare the Local Plan utilising the strategic steer to refine evidence and site assessments.
- 2.14 The Council consulted on a range of high level approaches for the delivery of development needs through the initial Regulation 18 consultation and sought comments on these approaches and the different spatial distribution options which were set out in each approach. This information has proven essential in gaining an understanding of the preferred strategy which the Council could pursue. Although a preferred strategy does not make specific decisions for individual pieces of land, its adoption allows the Council properly to consider which land should or should not be allocated for housing within the context of an agreed strategy. It also clarifies the direction for the plan agreed and supported by the Council and provides more certainty for residents and interested parties in terms of what can be expected from the Plan.

The Format of this Paper

- 2.15 This paper runs through a number of matters. The first section looks to agree a revised Vision and set of Objectives for the Plan based on the consultation feedback, focusing particularly on the matters raised by the local community in terms of what they want. The Vision and Objectives set out **what we want**.
- 2.16 From establishing a revised Vision and set of Objectives the paper looks at the main land use requirements, as established in the evidence and required by national policy. This sets out **what we need**.

- 2.17 The third section looks at what we are **able to do**. This reflects on the evidence in relation to land availability and the relationship with constraints such as flooding, the natural environment, the quality of the built environment, the purposes of the Green Belt and the appraisal of sustainability.
- 2.18 Taking account of **what we want, what we need and what we are able to do**, the paper reconsiders the high level options which have already been consulted on through the issues and approaches consultation and relevant elements of the sites consultation and recommends a final preferred strategy. The diagram below sets this out more clearly.
- 2.19 **The adoption of a preferred strategy is not the end of the decision making around the final Plan. The spatial and policy approach to meet that strategy will be subject to a sustainability appraisal to ensure it is the most sustainable way forward. It also needs to demonstrate that it can be delivered together with the infrastructure needs arising from it and that any amendment to the Green Belt required by the strategy meets the exceptional circumstances test.**



3.0 What we want

The Vision and Objectives for the Plan Revisited

The Vision

- 3.1 The Council set out its Vision for the plan in the first consultation (December 2015-February 2016). It is necessary to revisit this in light of the consultation responses across both stages of consultation to reflect the comments made regarding housing delivery, infrastructure and the local environment. The Vision needs to be forward-looking but also reflect the views and aspirations of existing communities, statutory bodies and interest groups.
- 3.2 The main comments regarding the Vision stated that it was generic and lacked local distinction or relevance; was unambitious, failed to reflect the views of the community and that it needed better to emphasise the protection of the natural environment. Further detail on these comments is set out in the Statement of Consultation (2016), which also committed to amend the Vision to:
- *Reflect the ageing demographic*
 - *Make various wording changes*
 - *Be more locally specific*
- 3.3 An amended Vision is set out below and reflects a need to focus on meeting the needs of residents across the areas of homes, jobs, education, leisure and health. It has also been amended to state that people will be located close to services and facilities to reduce the need for travel in this largely rural district and to improve accessibility for all. Amendments have also been made to reflect a desire within the district for high quality design, making high quality new places. It must be remembered that whilst a Vision should be aspirational, it should also be deliverable when considered in the context of the Issues² and statements of fact that are known at the point of preparation.

Proposed amended Vision

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

² The Issues set out in the Issues and Approaches document, are not intended to be issues in the negative sense in all cases, instead the Issues are those things which the Local Plan needs to respond to, or be aware on in its preparation. Some of the Issues listed were opportunities and things to be protected i.e. heritage. Whilst others, such as demographic facts are issues which the plan may need to seek to do something about.

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

The Objectives

- 3.4 The Objectives of the Plan were consulted on and were split across 7 sections; economy and tourism, housing, town centre/retail and leisure, design and safety/climate change, natural environment/heritage, flooding, and infrastructure.
- 3.5 The consultation has demonstrated infrastructure, particularly access to doctors and schools, and the prevention of flood in all its forms is the highest priority for residents. It is also evident that communities place high priority around protection and maintenance of the countryside and open spaces to which they have access. The Green Belt is considered a very important tool for keeping land open. Whilst many responses were focused on objecting to the level of housing need in general; there was also an acknowledgement that housing was needed and that it should be affordable and for local people.
- 3.6 The Statement of Consultation (2016) set out that the Objectives should make provision for the protection of the Green Belt, the role of farming and agriculture and place an increased emphasis on the retention of heritage assets. In response it is recommended that a number of amendments are made to the objectives of the Plan and these amendments are set out below.
- 3.7 A new Objective relating to the Green Belt has also been prepared acknowledging that Green Belt is not an environmental designation or environmental constraint. As a policy designation that is designed to do a particular job, it is important to remember that the Green Belt must fulfil its purposes as set out in the NPPF and be capable of continuing to do so throughout, and beyond, the plan period.

Recommended Green Belt Objective:

“Maintain a Green Belt within Tandridge that serves the policy purposes of the Green Belt set out in the National Planning Policy Framework. To ensure that previously developed land is fully utilised and that the Green Belt endures beyond the plan period.”

- 3.8 In the Statement of Consultation (2016) the Council agreed to amend objective 15 to read *“Work with partners and service providers to maximise funding/benefits that will assist in the delivery and improve the accessibility of infrastructure, services and facilities for the district”*. Whilst it is acknowledged that the analysis of the second round of consultation is still ongoing, certain key messages are already apparent and it is considered that this objective should be further strengthened to reflect even better the responses received. These amendments reinforce the Council’s commitment to infrastructure provision alongside the delivery of development needs.

Recommended Infrastructure Objective:

“Work with partners and service providers to ensure the delivery of improved infrastructure, services and facilities to meet the needs of the district across the plan period and to ensure that the provision of new or enhanced infrastructure matches need as it arises.”

- 3.9 As set out in the Statement of Consultation (2016), the importance of affordable homes to residents and interested parties, was evident. The need for affordable units is also identified through evidence and recognised corporately. On reflection, it is proposed that the housing objective is amended better to reflect the needs for more affordable forms of housing in the district, to meet the needs of families on lower incomes, first-time buyers and the aging population and to support the aspirations of existing local people to stay in the district.

Recommended Housing Objective:

“Provide a supply of homes for mixed communities, which would provide affordable units and opportunities to downsize appropriate to local needs. Housing mix will be more keenly focused on 2 and 3 bedroomed units to provide opportunities for residents to upscale and downsize more easily within the district, according to their needs.”

- 3.10 Local Plan process often gets overtaken by discussions surrounding housing provision, but housing delivery must be balanced with local employment opportunities and a recognition that our existing businesses need to be supported for wider economic benefit. Responses to consultation showed a concern for the role of the economy and comments were made that the economy and tourism objectives were unclear and had insufficient focus on the rural nature of the district. It is therefore recommended that the objectives for the economy are clarified and should further highlight the support for a thriving rural economy.

Recommended Economic Objective:

“To strengthen and diversify the economy by providing sufficient, sustainably located employment land to meet local needs and to provide opportunities for residents to work locally. Existing businesses will be supported by enabling intensification and, where appropriate, the

expansion of current employment sites will be encouraged. Rural businesses and the rural economy will continue to be seen as an asset to the district and their often unique requirements, and need to be close to customers, will be respected.

Support the development of tourism by recognising local tourism assets and supporting those that enhance the local economy without significant harm to the quality of life of local residents.”

4.0 What we need?

What does the evidence say?

- 4.1 The Plan must consider, and make provision for, development needs up to 2033. Plans have to be monitored and mechanisms put in place, to ensure they continue to reflect circumstances and needs, which may change over time, and to ensure they remain successful in delivering the strategy and policies that they set out to achieve. Such changes can require a review.

Housing

- 4.2 The greatest challenge of our Plan is finding land to meet not just the housing needs of the District, but also other land uses to support those homes, including roads, schools, open spaces, medical facilities, recreation and sports facilities and jobs.
- 4.3 Our housing evidence says we need 9,400 homes and 26 gypsy/travelling showpeople³ pitches/plots for the plan period up to 2033. But it is not just about the numbers but also about the type, size and tenure of those homes. There are a high number of executive style 4-5 bedroomed properties in the district and this goes hand-in-hand with an affluent, older (over 40) demographic which is arguably driven by the connections and proximity to high-paid employment in London. Continuing this housing trend will not benefit local residents who are just starting out, or who are priced out of the local housing market, leaving them with little other option than to seek a home elsewhere. In turn, this will result in continued outward migration of those from London and elsewhere, who have the funds to purchase such homes. As such, the Local Plan will need to look at ways to strike a better balance and provide more opportunities for local people of all incomes, through the delivery of homes which are affordable, both in terms of tenure and actual price.
- 4.4 Affordability of housing is a real issue for the district, with house prices at over 14 times the rate of earnings. The Local Plan needs to be able to respond to this, as much as is realistic through plan-making and it is a factor in determining the preferred strategy of the Local Plan. This can be done through policies for affordable housing provision which govern the type and number of properties which can be delivered and also by increasing the number of properties which are available. However, there is some discussion surrounding this latter point and how many properties it would take to alter an affordability trend.

³ Taken from an early draft of the updated Gypsy and Traveller Accommodation Assessment and could be subject to change.

- 4.5 It should be noted that there is a difference between affordable homes, as defined by government policy, and affordability, and both of these points are considered individually below.

Affordable Housing

- 4.6 Affordable housing, as defined by government, relates to properties which are provided with the support of registered housing providers and local authorities. These properties are provided to those that meet particular criteria and who are unable to access the housing market directly be that through income or circumstance.
- 4.7 Current local policies require a proportion (34%) of affordable units to be delivered on developments of at least 10 dwellings, where that number is the net gain, and where it is viable for the developer to do so. As a district, there has been a trend for developments which are of 9 units or fewer which limits the delivery of such properties. The provision of affordable housing is further hampered by the limited land capacity of existing settlements which cannot accommodate schemes capable of delivering over 10 units. This has resulted in a significant unmet need for affordable homes.
- 4.8 The Council's Strategic Housing Market Assessment considered affordable housing needs⁴ for the district over the plan period of 2013-2033 and identified a requirement for 284 units annually. Delivery rates of affordable units have been around 50 units per year for the last few years and this has generated a backlog which the Planning Practice Guidance (PPG) suggests should be met in the first 5 years of a plan period. The evidence concludes that there is a net annual need for 456 affordable units for those first 5 years, with a focus on 1, 2 and 3 bed units. The SHMA calculated the affordable needs at a time (2015) where 1,050 families and individuals were on the Council's waiting list for a home; this has since risen to over 1,200 (2017). These figures are not on top of the OAN calculation, but the ability to deliver affordable units is inherently interlinked with the delivery of market homes. As such, it is clear that increased housing delivery is needed to provide much needed homes for our community.
- 4.9 Full details of the calculation of affordability are set out in the report Strategic Housing Market Assessment 2015 – Calculation of Affordable Housing Need.

⁴ The methodology for Strategic Housing Market Assessment as set out in the Planning Practice Guidance requires that a separate calculation for affordable housing need is carried out from general housing need. Affordable housing need is not in addition to the Objectively Assessed need, but is expected to be met through general housing delivery as a proportion.

Figure 3.4: Size of Affordable Housing Needed

	Bedrooms				Total
	1	2	3	4+	
Backlog housing need	87	64	20	1	172
Newly arising future need	57	123	87	17	284
Net annual affordable housing need	144	187	107	18	456
%	32%	41%	23%	4%	–

Source: Turley, 2015

Affordability

4.10 Affordability, however, relates to the general ability for someone to purchase a property at full market value, based upon their own income/financial position. Tandridge is one of the least affordable local authority areas in Surrey with an affordability ratio of more than 14 times earnings.

4.11 The affordability of an area however, is not easily solved and could require increasing the supply of homes being delivered to a level beyond the calculated need requirement and well beyond the level the land capacity is capable of providing, before any impact on affordability could be seen. The Council’s current OAN includes no uplift for affordability in recognition of this and the fact that Tandridge has historically had affordability issues along with the majority of the South East. Affordability is a current ‘hot topic’ in housing needs and the Council will keep apprised of how discussions develop in terms of Inspector decisions and Government papers⁵.

4.12 In summary, we need 9,400 homes, with a focus on 3 bedroom or smaller properties,⁶ delivering the most affordable housing that development viability will allow having taken account of all development costs, including infrastructure. The Local Plan must be cognisant of these matters and the preferred strategy must be one which seeks to respond.

Employment

4.13 The land requirements for employment needs in the district are significantly less than those for housing but are an important part of the overall Plan as well as an important element of sustainable development

⁵ This point is being closely monitored following the recent publication of Mid-Sussex District Council Interim Housing Findings.

⁶ Strategic Housing Market Assessment 2015 figure 3.3

and supporting the local economy. The evidence set out in the Economic Needs Assessment (ENA) (2015) identifies that, for the plan period, the district is likely to have a surplus of B2/B8 land uses for warehousing and industry, but will need to provide additional employment space for B1 office use.

B1 office demand up to 2033		
Low	medium	high
1,415sqm (net 1,080sqm)	7,379sqm (net 7,522sqm)	13,861sqm (net 14,522sqm)
B2 and B8		
Low	medium	high
-2.0ha (net -7.9ha)	-1.3ha (net -7.1ha)	-0.7ha (net -6.5ha)

4.14 The current evidence suggests that any additional need for employment space could be accommodated by intensifying the use of existing sites. However, concerns remain about the availability of a number of these sites as set out in the ENA, and whether they can be intensified. Further, the location of the majority of these sites is remote from homes and services and reliant on rural road networks. When determining supply and the capacity of existing employment sites, sustainability, or the absence of, will be a factor.

4.15 The evidence set out above has been prepared in advance of the establishment of a known delivery target for homes and strategy for the Local Plan which would inevitably require a review of those figures to ensure that the level of employment is not unsustainable when set against the number of homes which the plan will make provision for, and vice versa.

Retail

4.16 The Retail and Leisure Study (2015) suggests that around 9,265 sqm of retail space could be needed over the plan period. This was assessed against the high level options set out in the Issues and Approaches document and would be subject to refinement following the determination of the preferred strategy. It is also suggested that around 2,000sqm of this could be met within existing service centres.

4.17 The Study identifies areas where it is considered that retail should be protected and suggests that a more strategic approach to its provision should be considered i.e. assigning a retail centre boundary around those facilities in places such as Godstone. Protection and enhancement of our retail centres will be essential to sustaining our communities.

Infrastructure

- 4.18 Infrastructure is a major concern for residents and consultation responses make it evident that there is a worry that the Local Plan and the development delivered through it will make current issues worse. One of the fundamental difficulties of the plan-making process is being able to show interested parties how infrastructure will be factored in before options can be formulated and consulted upon. This is an inherent, albeit understandable, consequence of the system. Infrastructure providers can only tell the Council what will be needed, funded or provided once they have absolute details to model and test, and an understanding of the population that it would need to accommodate. Once the Council has chosen the preferred strategy, more intensive work can begin with infrastructure providers who will undertake their own modelling, forecasting and assessments, the findings of which will not only help to refine the content of the Plan to be submitted for examination, but also become a factor for the work programmes of individual providers and their own future planning.
- 4.19 The revised objectives acknowledge the importance of infrastructure for the Local Plan and strengthen the Council's position that development cannot proceed without the adequate improvement to support any growth. The strategy for the Plan does need to recognise, however, that the spatial distribution of infrastructure improvements will follow the locations of development and those areas that do not receive any development are much less likely to secure funding for improvements to existing infrastructure unless it comes from external sources such as government initiatives. Whilst the Community Infrastructure Levy (CIL) does exist and can be bid for, monies gained through CIL will be directed where they are most needed and only as frequently as the mechanism allows. A review of the current CIL will be required following the submission of the Local Plan to ensure that it reflects the future infrastructure requirements generated by the Plan.
- 4.20 The Plan will need to look to general infrastructure funding streams from CIL and service providers, for example, for the upgrade of infrastructure not directly connected to allocated development sites in order to manage the natural growth of existing settlements. The strategy will not provide 'quick-fixes' for existing infrastructure deficits in locations that are not accommodating the necessary scale of development and the simple fact remains that the larger the scale of development, the more infrastructure is delivered. As such, the provision of infrastructure on a garden village scale, for example, would increase the overall strategic provision of infrastructure and would have the potential to relieve pressure on other areas as catchment areas for facilities adjust.
- 4.21 So whilst a preferred strategy may be capable of meeting development needs, the ability to accommodate the infrastructure required will be a

significant challenge, and the right strategy to get the most return in terms of infrastructure will be adopted.

Transport

- 4.22 One of the most common comments raised through consultation related to the road infrastructure. In 2015 the Council undertook a high-level strategic highways assessment, carried out by the Surrey County Highways team. The assessment modelled the potential impacts of the delivery approaches set out in the Issues and Approaches document (2015), and provided a baseline understanding of where particular issues in the highway network might arise. The assessment identified common issues across the approaches tested and identified particular impacts in the north of the District, including Oxted and Hurst Green, Godstone, Caterham and Warlingham, and confirmed the comments received through consultation. District boundary issues on the A22 at Felbridge and A25 towards Westerham were also pointed out. Despite impacts being identified, none were considered to be 'severe' and it was concluded that mitigation was possible. Since these approaches were compiled and tested, much has changed, not least the refinement of the sites being considered, where many have been found unsuitable, but there are also new ones to consider. All relevant sites and strategy implications will be tested again as the plan moves forward.
- 4.23 Approach 6, which considered the concept of a new or extended settlement option, was not assessed as there was no detail which could be tested, nor potential locations considered.
- 4.24 The preferred strategy of the Local Plan will need to be tested by the highways teams which will assist with further refinement of the plan's content. Most importantly, the new modelling will identify specific mitigation and interventions which support the delivery of sites, or identify where development should not be supported. The mitigation strategy will identify the levels of funding that would be needed from developers as part of their contributions for road improvements, and this will assist in determining the viability and deliverability of sites.
- 4.25 The next stage of transport modelling will utilise an updated methodology applied by Surrey County Highways, which will also reflect more keenly on access to public transport networks, not just private car use.

Parking

- 4.26 Consultation comments on the Local Plan have shown that parking, particularly around train stations and in town and village centres, is a particular issue for the community. Although the preferred strategy cannot respond to this directly, it will be a factor that will need to be considered when preparing policies and assessing sites.

- 4.27 A parking review in the district is underway and covers off-street car parks, but will also identify on-street parking issues, working with Surrey County Council, the highways authority. Oxted is the first area to undergo a review and the findings of this will be viewed and discussed by the Resources Committee at the appropriate time. Reviews will then be carried out in further locations.
- 4.28 A review of the Parking Standards may also be necessary and will be a matter for consideration once the implications of the preferred strategy for the Local Plan, and the locations that would deliver development, are better understood.

Education

- 4.29 A requirement for additional school places is likely to be generated by new development. In very broad terms, a proposed development site comprising 2,000 new homes would be expected to produce 2-3 FE (where FE refers to forms of entry) worth of primary and secondary demand. Secondary provision is only generally only considered to be viable at a size of 6FE.
- 4.30 There is a limited amount of surplus capacity within the system (current and forecast), so it is expected that any growth as a consequence of house building would have to be accommodated via expansion of provision (or the creation of entirely new provision) equivalent to the pupil yield of those developments, which SCC's current models estimate to be 0.25 primary pupils per unit and 0.18 secondary pupils per unit. The education authority forecasts the need to provide school places on future projections; the current target set out in the Core Strategy was not significant enough to warrant new schools at all levels. The small-scale, piecemeal development which has taken place has not been sufficient to reach the critical mass to which the education authority could easily respond to nor deliver education provision at the rate that the community has needed, or in the locations it is most needed.
- 4.31 The preferred strategy for the Local Plan will have an implication for education provision. The Local Plan preparation provides an opportunity for the Council to strategically consider development sites which are of a scale and nature that would demand increased provision both through expansion of existing schools and direct delivery on-site.
- 4.32 For on-site provision, it would be expected that a development would be large scale, possibly significant enough to accommodate the needs of the development in its entirety. In the case of secondary provision, such development would, at the very least, significantly facilitate the delivery of a new secondary school which would meet the needs of a much wider catchment. This would most certainly be the case with the 'New and Extended Settlement Option' that has been considered through both stages of consultation so far. Development of such a scale would have to allow for a new primary school and likely the provision/facilitation of a

new secondary school. School place planning colleagues at the education authority will have a view on the current pattern of secondary provision which is skewed to the north of the District.

- 4.33 The Council is awaiting the publication of the up to date Surrey School Organisation Plan in order to further inform the process and will work with the education authority to fully establish how the delivery of the preferred strategy would be catered for.

Primary Care

- 4.34 Health care provision in the district is a known issue and the NHS is struggling to cope at a national level. However, this does not help our communities and the Local Plan must do what it can to try and assist in this matter.

- 4.35 The Clinical Commissioning Group (CCG) is in the process of reviewing its position and has prepared a Strategic Estates Plan 2016/19. There is a clear intention for the CCG to move towards an enhanced primary care offer which co-locates a number of health services including diagnostic testing, minor injuries and general practice surgeries all in one place. However, this is a long-term ambition and the CCG acknowledges that these will not be provided for all existing surgeries but is being considered for Lingfield, Horley, Caterham, Oxted and Redhill/Reigate. These proposals provide a real opportunity for increased health provision and could assist with meeting the demands of new development.

- 4.36 In advance of this the Council still needs to consider ways of supporting primary care in case the CCG is unable to deliver as swiftly as they would hope and in light of the fact that the Local Plan is a long-term strategy.

- 4.37 The table below captures general details on surgeries in the District and shows that there are capacity issues., The clear capacity issues set out here is supported by the extensive comments received both stages of consultation particularly in the cases of Oxted and Lingfield.

GP	List size as of Oct 2016	Current Gross Indoor Area (sqm)	Space required to match list (sqm)	Variation (sqm)
Lingfield	10,637	337	661	-324
Oxted	16,592	600	909	-309
Pond Tail	7,388	310	413	-103
Caterham Valley	9,364	445	496	-51
Elizabeth House	5811	550	331	219
Townhill	12,990	948	744	204

Warlingham Green (incl. Chaldon Road)	11,163	774	579	195
Whyteleafe	6,072	198	331	-133
Smallfield	6,605	397	331	66

4.38 Clearly Oxted, Lingfield and Pond Tail are the most seriously disadvantaged with regard to clinical accommodation. All practices have a significant deficit which amounts to some 736sqm, the equivalent of an additional surgery. Both Oxted and Lingfield have been identified as potential locations for the development of a health and social care campus by the CCG, but they note there is a particular issue with Oxted which does not have the land capacity to accommodate this in the current location.

4.39 In terms of large scale strategic development, it would be easier to provide the space for a larger surgery facility which could be provided on site for the benefit of that new community, limiting the pressures on existing surgeries. This would however, need to be fully considered if the preferred strategy were to pursue such an option.

5.0 Meeting the challenges - what we are able to do?

- 5.1 There is a large evidence base that has been prepared for the Local Plan and sets out what we are able to do in terms of meeting the development needs of the district. However, it also sets out large amounts of information identifying what we are **not** able to do.
- 5.2 The District is heavily constrained and the Council has already applied various criteria that have ruled out land from consideration for meeting development needs, including Areas of Outstanding Natural Beauty (AONB) high risk flood areas and areas of Sites of Special Scientific Interest (SSSI).
- 5.3 The Housing and Economic Land Availability Assessment (HELAA) methodology states that only sites which are adjacent to sustainable settlements (or adjacent by proxy of an adjoining suitable site) should be considered as being in a suitable location. Settlements listed as being suitable, albeit to varying degrees, are those listed in tiers 1 to 3 of the Settlement Hierarchy (2015) evidence. Settlements within each respective tier of the hierarchy are set out below. In the absence of a preferred strategy, this has been the most robust approach to the consideration of sites, in accordance with the principles of sustainability set down in the NPPF.

Tier	Name	Settlement
1	Urban settlements	Caterham on the Hill Caterham Valley Hurst Green Limpsfield Oxted Warlingham Whyteleafe
2	Semi-Rural Service Settlements	Godstone Lingfield Smallfield
3	Rural Settlements	Bletchingley Blindley Heath Dormansland Felbridge Old Oxted South Godstone South Nutfield Tatsfield Woldingham
4	Limited and Unserviced Settlements	All other settlements

- 5.4 Different options which looked at different patterns of dispersal of development across the top 3 tiers of the Settlement Hierarchy have been suggested and consulted on through the Issues and Approaches consultation in 2015/16. These were set out in Approaches 1-5.
- 5.5 Another option that was considered was Approach 6, which would be a new or extended settlement, of a scale capable of being self-sustaining and primarily containing and providing development and infrastructure to support itself. All of these approaches are considered further below.

Approach 1 – The Status Quo

- 5.6 Although there was some criticism of the Council, through consultation, for not following Approach 1, which was to continue to follow the Core Strategy requirements, the Core Strategy did not strike a balance between meeting total development needs and other policies as required by the NPPF because it did not start its consideration with a full understanding of needs and this has been explained more fully in Chapter 2. Continuation of the current approach would not be compliant with the approach set out in the NPPF, nor would it attempt to meet the predicted population growth identified by national statistics or the needs of existing communities. Simply transferring the Core Strategy approach would also fail to take account of the new and updated evidence which reflects the changes to demographics, population movements, market values and affordability, provision of infrastructure etc. that have occurred since the Core Strategy was developed and adopted.
- 5.7 Accordingly, this approach was not assessed through the Sustainability Appraisal which accompanied the Issues and Approaches consultation document as it is the status quo and would amount to the Council taking no steps to meet identified needs. It is not therefore considered a legitimate option and was only included in the consultation to demonstrate the current position. The figures associated with this approach stemmed from the permission and commitments to development at that point in time and did not identify any new sites that were not associated with a planning application. The figure, also known as existing supply, formed part of the overall numbers for the remaining options as a baseline. Supporting this approach as a stand-alone concept would be found unsound by an Inspector and arguably fail our communities in providing and planning sufficiently for their identified needs, infrastructure and affordable homes.

This approach is not recommended.

Approaches 2A and 2B – To focus residential development in existing inset areas at varying densities.

- 5.8 Approach 2A and 2B looked at the potential delivery from development within the existing settlements at two different density levels; 2A was an average of 30 dwellings per hectare (dph) and 2B was a blanket of 70

dph. Essentially, these approaches considered land availability in the areas where development predominantly already takes place, i.e. those areas which have proven to be the more sustainable locations because they have the majority of services centralised, with wider access to public transport. Approach 2 only looked at the settlements which are inset from the Green Belt.

- 5.9 The delivery of this approach relies on continuing to develop within those areas where infrastructure issues are most keenly felt and generally more difficult to remedy. Whilst an increase in densities could be looked at and is supported by the recent Housing White Paper (2017), the reality is that Tandridge is not a densely developed district, with an average of 19dph across the Caterham, Warlingham, Whyteleafe cluster in the north; and around 12dph in the Oxted and Limpsfield cluster, for example. **Increasing densities to a significantly higher level within the existing boundaries would risk unacceptably and inevitably altering their character. In any event, those areas would be unlikely to have sufficient available land to support the intensification with necessary infrastructure.**
- 5.10 However, it is clear from both government policy, and the views of respondents to the consultations, that the utilisation of land within existing boundaries should be the priority, although consultation responses from Caterham communities certainly reflect the view that the Core Strategy, which focused development on Caterham and Oxted in order to retain the countryside unchanged, resulted in a detrimental change to the area over a short period of time. To reflect the government's directive and the Council's 'previously developed land first' approach, additional work is programmed to explore whether there is any additional potential within the built up areas that is not immediately obvious, or that has not been submitted through the HELAA process. The work will also enable the Council to further consider the amount of housing likely to come forward as a 'windfall' and the ability to increase densities and any impact of doing so.
- 5.11 In light of this, the sustainability appraisal did not consider Approach 2 to be a sustainable approach in its own right, as it fails address fully housing (including affordable housing) need. It is also considered that such a strategy would be a continuation of the current position where unplanned development continues to come forward without the necessary planning in place to address infrastructure deficits. That said, development within these existing areas will not stop, but could be better managed if it forms part of a wider preferred strategy which would better understand infrastructure requirements and put in place mechanisms to manage these.

This approach is not recommended in its own right.

Approaches 3, 4 and 5 - varied spatial distribution of sites across settlements in the top three tiers of the hierarchy, and a maximum capacity option

5.12 Approaches 3, 4 and 5 looked at the potential delivery of development within existing settlements and from sites on the edges of settlements, split out according to the settlement hierarchy. Approach 5 was a maximum capacity option and considered development on the edge of all established settlements. As such, these approaches considered development within inset areas and those settlements which remain washed over by the Green Belt.

Approach	<i>Spatial distribution of development</i>	<i>Tiers affected</i>
3	<p><i>Residential:</i> Approach 1 + Approach 2a + sites that are currently in the Green Belt around the main urban settlements and semi-rural service settlements</p> <p><i>Commercial:</i> Intensification of all employment sites within the district.</p>	1 and 2
4	<p><i>Residential:</i> Approach 1 + Approach 2a + sites that are currently in the Green Belt around the rural settlements. This approach has a <u>reduced</u> consideration of development tier 1 and 2 settlements and a <u>greater emphasis</u> on development in tier 3 settlements.</p> <p><i>Commercial:</i> Intensification of all employment sites within the district</p>	1,2 and 3
5	<p><i>Residential:</i> Included development in all locations listed in approaches 1, 2a, 3 and 4 and was based on maximum capacity of sites and includes settlements in tiers 1, 2 and 3.</p> <p><i>Commercial:</i> Intensification of all employment sites within the district.</p>	1,2 and 3

5.13 These approaches were unpopular when consulted on because they would require the amendment to the Green Belt boundary and it was felt they would place unacceptable strain on infrastructure, particularly roads, doctors and schools and would impact on flooding. The views of the community were understandable to an extent and were not assisted by the difficulty of the plan-making process which cannot be clear about how infrastructure could be improved without the direction of a strategy or known quantities of or locations for development.

Approach 3

- 5.14 Approach 3 focussed development in Tiers 1 and 2 of the Settlement Hierarchy, but unlike Approach 2, it looks at including development on the edge of settlements and in the Green Belt. All settlements in these tiers, excluding Godstone, are already inset from the Green Belt and have a long-standing history as being the main service and retail centres in the District with the highest populations and connections to public transport. The NPPF supports channelling development to the most sustainable locations in the first instance and this approach seeks to do this.
- 5.15 The Sustainability Appraisal considered Approach 3 to be a sustainable approach that would be able to deliver development, with a lesser impact on the environment than Approaches 4 and 5. Pursuit of this option would still need mitigation, however.
- 5.16 To achieve this approach the Council would have to consider suitable sites in the Green Belt on the edge of Tier 1 and 2 settlements. Some of these sites do not meet any of the defined purposes of the Green Belt and any development would be prioritised in these locations, subject to them passing an exceptional circumstances test before any decision could be made. This test would include an assessment of how well an area performs against the purposes of the Green Belt and whether there are sufficient reasons to outweigh the designation. In those sites where the purposes of the Green Belt have been shown to be met, any exceptional circumstances test would require a very high benchmark to be set. It is also important to remember that the version of Approach 3 consulted on in 2015/16, included a number of sites which have since been discounted and refined through new evidence and may include new sites which were not part of that consultation but have since entered the process.
- 5.17 As such, whilst it would need refinement in accordance with the evidence and process, Approach 3 could form part of the Council's preferred strategy and allow the delivery of homes for the short to medium term of the plan period.**

Approach 4 and 5

- 5.18 Of these three approaches the Sustainability Appraisal (2015) concludes that Approach 4 is unsustainable in its own right and whilst it could contribute to the diversification of housing stock in the more rural settlements, the gains would be limited when compared with the impact upon the environment and the settlements themselves. Approach 4 focused on those settlements which were in Tier 3 of the Settlement Hierarchy and which are not only rural in nature, but which have only basic services and rely on other settlements for their broader sustainability. As such, it is understandable that the Sustainability Appraisal would reach this conclusion, as without significant injection of

development and funding, incremental development could overwhelm these settlements. Concurrently, large scale development would alter the rural characteristics of any of these settlements and an acceptance that this would need to be had in order to deliver the strategic priorities of the Plan.

- 5.19 That said, to ensure that the Council has considered all reasonable alternatives in attempting to meet development needs, Approach 4 was included along with others, as part of a hybrid strategy in Approach 5, which sets out the maximum capacity at that point in time and would see development in and around all settlements in the top 3 tiers of the Settlement Hierarchy. Despite Approach 5 being found to be sustainable, it is felt that the outcome would result in an imbalance between environmental harm and housing gain, resulting in a fundamental alteration to the character and nature of the District, would generate unacceptably rapid pressure on the infrastructure, landscape and biodiversity and would be contrary to the Vision and Objectives of the Plan. Further, the sustainability appraisal acknowledges that the mitigation with Approach 5 would be challenging.
- 5.20 It is also considered that a strategy that plans for incremental development of a predominantly non-strategic nature, and of a scale that does not have wider benefit, would place additional pressures on an already basic level of infrastructure in Tier 3 settlements, would not prove to be sustainable and contrary to the Vision and Objectives of the Plan.
- 5.21 These issues/negatives associated with Approach 5 would be in addition to the extent to which the Green Belt would be impacted. The ability to deliver this approach successfully is questionable and it would be unreasonable to assume that such a significant amount of land would meet the exceptional circumstances test.
- 5.22 **As such, it is not recommended that Approaches 4 or 5 be carried forward into a preferred strategy, nor should the strategy seek to allocate sites in or adjacent to the settlements in Tier 3, or Tier 4, of the Settlement Hierarchy.**

Development in settlements within the Green Belt and infilling

- 5.23 Irrespective of the strategy which the Council pursues, infilling and small scale development within Green Belt settlements will not be prevented and is supported by relevant national policies. However, it is evident that the continued piecemeal developments which form the majority of housing development in the area, have not served the district's infrastructure well. As such, it is important that the preferred strategy for the Local Plan recognises and responds to this by ensuring that it does not actively seek to encourage sporadic development which can alter the

rural character of our smaller settlements, in particular, and/or place undue pressure on services.

Neighbourhood Planning

5.24 Neighbourhood Planning is a fundamental part of the Local Planning process and it is right that when determining the strategy for the Local Plan, the Council seeks to ensure that the role and abilities of neighbourhood plans are also reflected. A number of our communities have embarked on the preparation of a plan and there is clear support for them.

5.25 However, they cannot make strategic decisions and must be in compliance with the Local Plan. As such, it is not possible for a neighbourhood plan to alter the Green Belt boundary, even if the community wishes to do so in order for development to take place. Green Belt boundaries can only be amended through a Local Plan and preparing groups and forums would need to liaise with the planning authority to enable this.

5.26 The government are supportive of neighbourhood plans which seek to allocate land for development and which take a leading role in delivering much needed homes and services within their locale. Therefore, where a neighbourhood plan would need to amend a boundary to facilitate development delivery, proper consideration will be given. However, the Local Plan would only be able to support such allocations where exceptional circumstances exist and where any associated settlement inseting is also supported, if relevant.

Approach 6 – New or extended settlement

5.27 The Issues and Approaches consultation in 2015/16, asked about the concept of a new or extended settlement as a way of meeting development needs. Such a concept was not presented in any detail at that time, but by its very nature would be of a scale more capable of 'consuming its own smoke' and self-sustaining the development through on site infrastructure delivery. The consideration of such an approach is in accordance with the NPPF and government thinking and is a reasonable alternative that the Council must consider in its efforts to meet development needs in full.

5.28 Although a new or extended settlement was not universally considered to be an appropriate approach during consultation, many wished to see more detail so they could make more informed judgements. Some also felt this approach was a good solution to preventing incremental development which they felt could be more detrimental to the district overall. Further work on the concept of a new or extended settlement

has taken place and the findings were further consulted on through the Local Plan: Sites Consultation.

5.29 At the time of the Sites Consultation, the Council had considered a number of areas as potential locations for a new or extended settlement. Further detail on this process is set out in both iterations of the Spatial Approaches Topic Papers that sat alongside both the Issues and Approaches and Sites Consultations. Of those areas considered, the two areas were found to have the potential to accommodate such a scale of development were Blindley Heath and South Godstone.

5.30 Since the site submission window for the 2016 Housing and Economic Land Availability Assessment closed, a number of other sites have been submitted, some of which are of a scale and nature to be considered in the same manner as those two areas had been. The locations of these additional sites are below, and further information on each of these can be found in Appendix A:

- Land west of Edenbridge (east of Lingfield)
- Land at Chaldon, Alderstead and Tolsworth Farm;
- Redhill Aerodrome

5.31 In the case of Blindley Heath and South Godstone, landscape and ecology assessments have already taken place. To ensure we remain consistent in our treatment of sites, if the Council were to support a new or extended settlement as part of the wider strategy for the Local Plan, this work would also need to be carried out in the new locations. A significant amount of work would be required to assess the suitability and deliverability of these sites, and it would be necessary to engage with our neighbours on each of the newer sites, which straddle administrative boundaries of Reigate and Banstead, and Sevenoaks, respectively.

5.32 The analysis of the responses to the 2016 Sites Consultation is still being carried out but a number of concerns surrounding this approach have been raised including: the inability of such a scheme to cater for short-term development needs; concerns about the ability to accommodate such a concept within the district without a significant impact on infrastructure and the inability to mitigate the harmful impacts to the Green Belt and the environment.

5.33 There can be no doubt that the pursuit of such an approach in any strategy would inherently impact upon the landscape and potentially alter the character of settlements where they were located. In order to support a strategy which included such a development it would need to be accepted that landscape would alter, but that this would be outweighed by the benefits that could be gained.

- 5.34 The sustainability appraisals carried out at the two respective stages of consultation did highlight that there would indeed be an environmental impact if a new settlement or significant extension, were to be pursued. They also concluded that whilst it was not possible to fully appraise such an approach in the absence of specific details such as the number, type and mix of units, level of open space, and infrastructure implications (which would only be determined through detailed master planning), the significant contribution to housing and infrastructure provision was clear. The Sustainability Appraisal did, however, point out that whilst the benefit to housing and infrastructure delivery would be apparent, this would only be in the long-term and would be unable to contribute in the shorter term. Such a statement is understandable given the length of time it would take to plan, design, permit and construct such a scale of development. A new or extended settlement would need to have specific types of infrastructure in place ahead of being able to commence work on actual buildings. The basic provisions such as drainage and power would unlikely already to be in place or may be insufficient to support the development that would be delivered. As such, whilst the Sustainability Appraisal highlighted both positives and negatives with such an approach, it was not possible at that stage to draw definitive conclusions. Nevertheless, it does provide the Council with enough information to accept this is an approach which could form a substantial part of a wider strategy for the Plan where short-term needs are also addressed through additional allocations which would also be subject to further detailed investigation and appraisal.
- 5.35 The provision of a new or extended settlement, which could follow the principles of a Garden Village and be planned carefully, would address many of the objectives of the Plan and should form a key part of the strategy for the Council's Local Plan. It would provide a real opportunity to plan for a high quality environment which meets identified needs for the longer term.
- 5.36 Having considered the evidence, the requirements of national policy, the Vision and Objectives for the Plan and the themes emerging from consultation, **it is considered that the best balance can be achieved through a hybrid strategy which combines elements of both Approaches 3 and 6 and which supports allocations made through neighbourhood planning, where possible.**

6.0 The Strategy

6.1 It is considered that strategically the Plan should reflect the level of commitment the Government, the Council and the communities in Tandridge place on the importance of the Green Belt and that this should be retained where it continues to serve its purpose and only be released in exceptional circumstances. The approach set out in this strategy would form part of any exceptional circumstances test.

6.2 The strategy for the Plan should be one which meets development needs through:

- An infrastructure-led approach that ensures new development is capable of delivering infrastructure improvement to meet the needs of the existing and future population throughout the plan period;
- allocating a strategic site capable of delivering development based on garden village principles, including a primary school and which facilitates the delivery of a secondary school provision, primary health care facilities, highways improvements and employment space commensurate with the scale of housing;
- the utilisation of previously developed land at densities appropriate to the character of the existing area and by utilising higher densities in close proximity to public transport;
- the delivery of sustainable development through allocated sites on the edge of Tier 1 and 2 settlements and in locations supported by Neighbourhood Plans, by adjusting the Green Belt boundary where none of the purposes which define Green Belt are served and where exceptional circumstances are considered to exist;
- Supporting economic growth through intensification and/or expansion of existing employment sites, where appropriate; and by allocating additional employment land in sustainable locations to support the local and rural economy.

6.4 In summary:

The Local Plan will provide much needed homes and infrastructure by delivering a strategic development which accords with the principals of a Garden Village for the long-term, and to focus development to our urban and semi-rural service centres for the shorter term, whilst also supporting our Neighbourhood Plans.

The Green Belt boundary would only be amended in locations where the Green Belt purposes are not served, and where exceptional Circumstances are demonstrated.

Risks

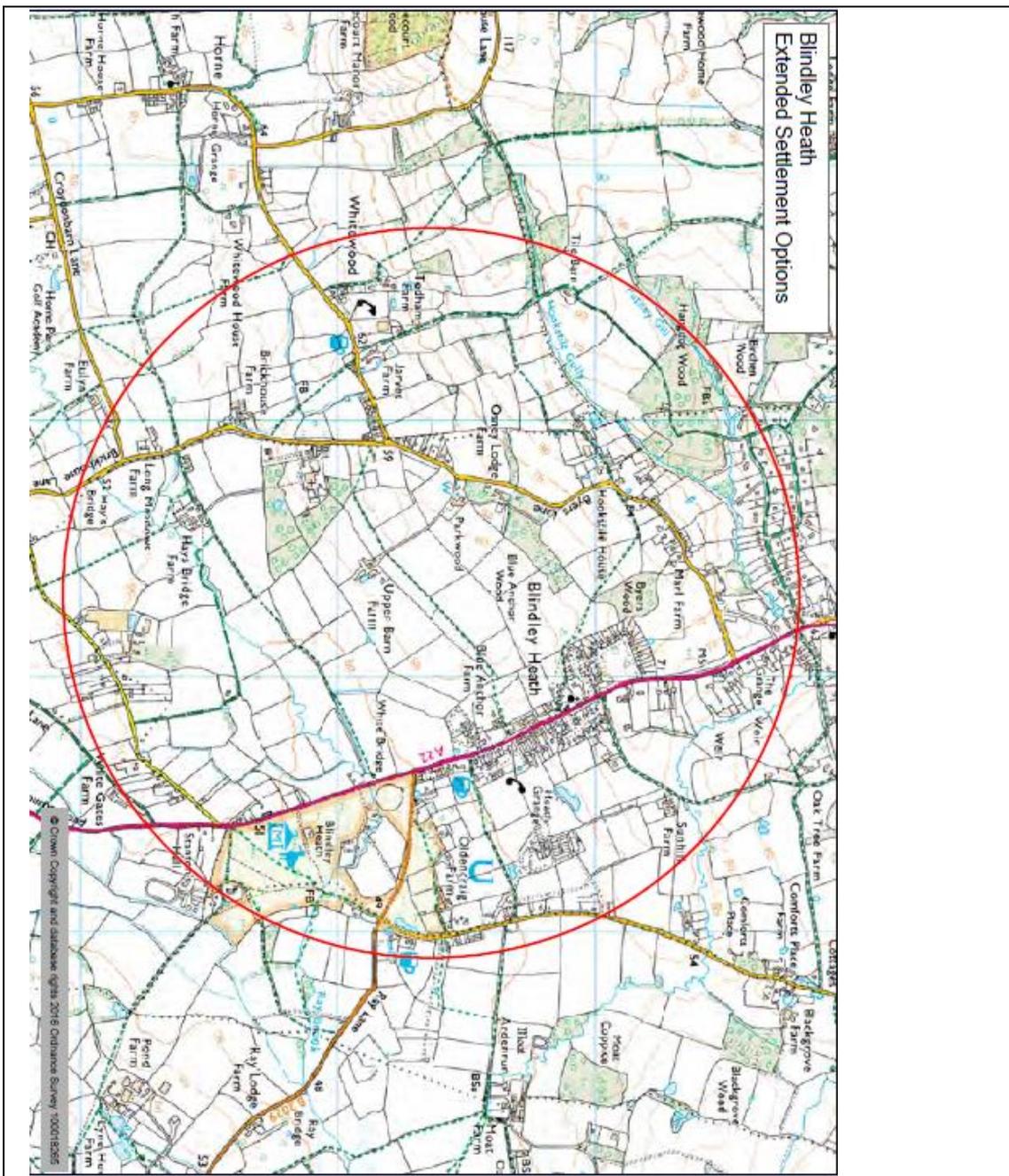
- 6.5 Given the presence of the Green Belt, the Council must acknowledge that development coming forward in urban (Tier 1) and semi-rural service settlements (Tier 2), separately from a Garden Village type development, may not provide a degree of housing that would significantly improve infrastructure in existing settlements. Neither would it provide the funding for new facilities elsewhere to take some of the strain. However, to reflect the fact that this will be an infrastructure led strategy, the Council will seek to ensure that infrastructure is provided for any incremental increases in housing supply outside of the Garden Village by looking at any appropriate policies and funding mechanisms including CIL and government funding. The Council will need to clearly set out in an infrastructure delivery plan how that would happen in tandem with the housing delivery and site release trajectory.
- 6.6 Further, depending on the extent to which exceptional circumstances can be demonstrated, it may prove more challenging to maintain a five-year land supply. Although the inclusion of the Garden Village type concept will contribute significantly to providing homes and meeting needs, the effect of this would not be seen until much later into the plan period. As the plan is prepared this matter will need to be considered further to establish the best way to ensure that Council's housing supply is robust and that it can withstand scrutiny at examination.

Next Steps

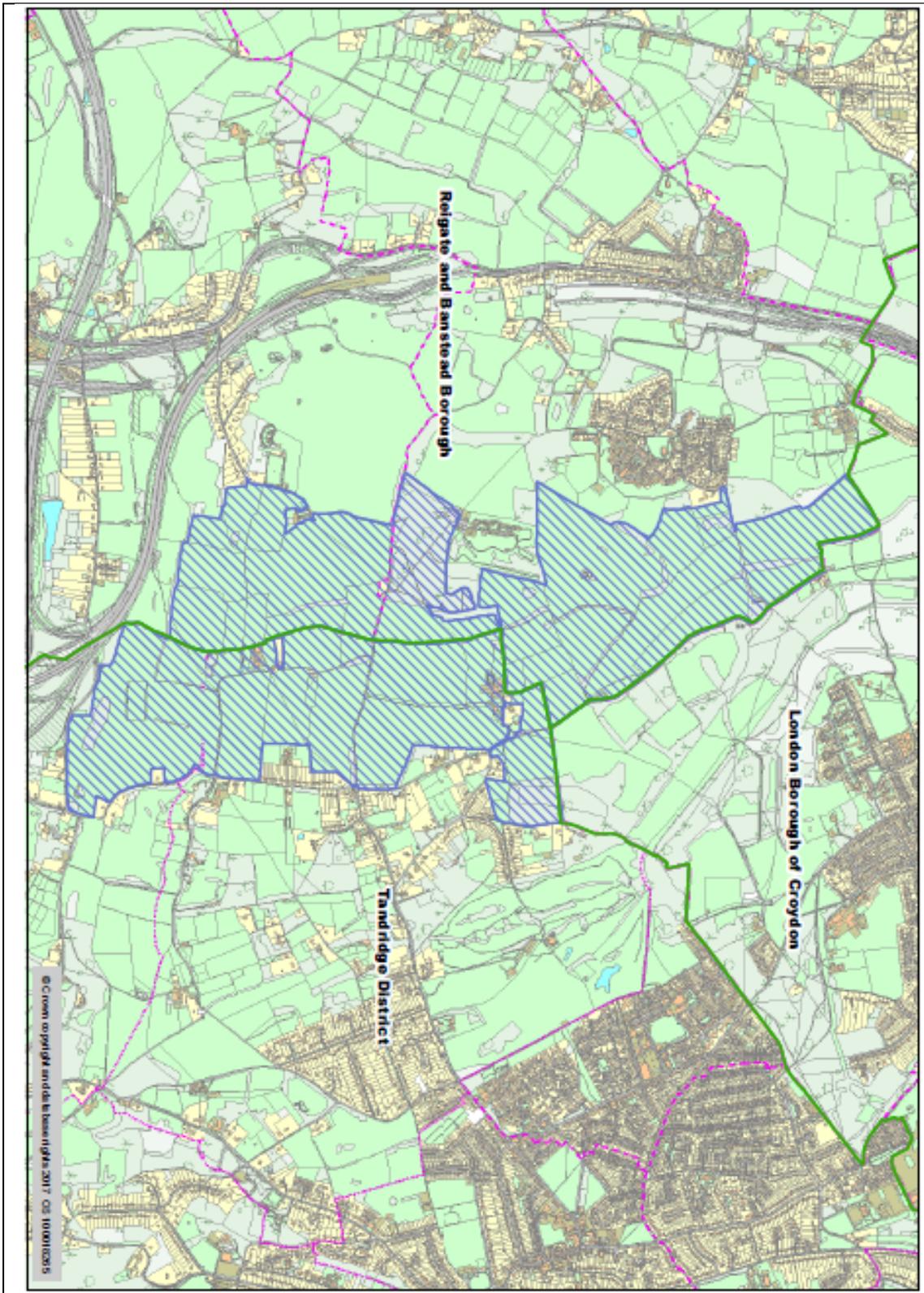
- 6.7 In order to produce a Plan based around this strategy it will be necessary to:
- undertake further evidence work,
 - apply the exceptional circumstances test having regard to the strategy,
 - produce the 2017 HELAA taking account of the strategy in defining the suitability of sites and the comments which have been seen through the 2016 sites consultation,
 - complete remaining evidence work on new sites submitted to the 2017 HELAA,
 - update the Strategic Housing Market Assessment and Economic Needs Assessment,
 - model the transport implications and map and match infrastructure provision with plan viability
 - test the whole plan for its sustainability.
- 6.8 Plan making will therefore need to continue in accordance with the strategy, ensuring that there is evidence to show how and why policy has been derived as well as why particular policy aims are not being pursued. Once all of this work is completed and the plan finalised – it will undergo further public consultation.

Appendix A – Strategic areas to be considered

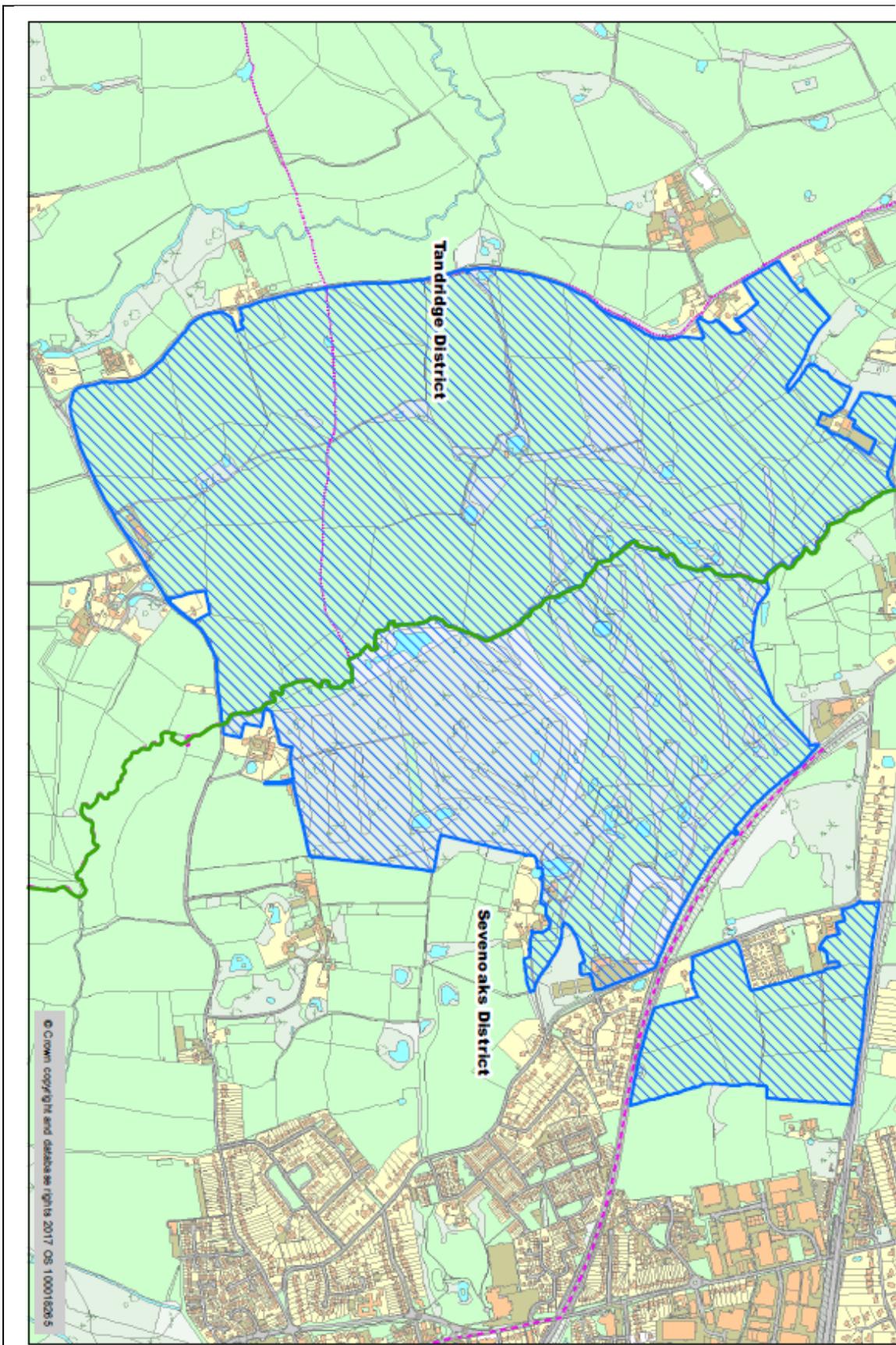
Address	Land to the west of Blue Anchor Farm, Blindley Heath
Gross site size (hectares)	121.93
Have sites been submitted to the HELAA process that fall within this broader location?	Yes. The largest site within this location is BHE007 and this site was considered in the HELAA 2016 and the Local Plan: Sites Consultation.
<p>Located in the Green Belt to the west of Blindley Heath. It comprises a number of fields and farm buildings. Some of the constraints existing on or adjacent to the site are Ancient Woodland, Tree Preservation Orders, potential Sites of Nature Conservation Interest, Rights of Way, Biodiversity Opportunity Areas and Floodzone 2 and 3. The known areas of flooding are in the southern part of the site.</p> <p>Information on the Landscape Capacity of this area is set out in the Landscape and Visual Assessment – Concept Areas 2016.</p>	



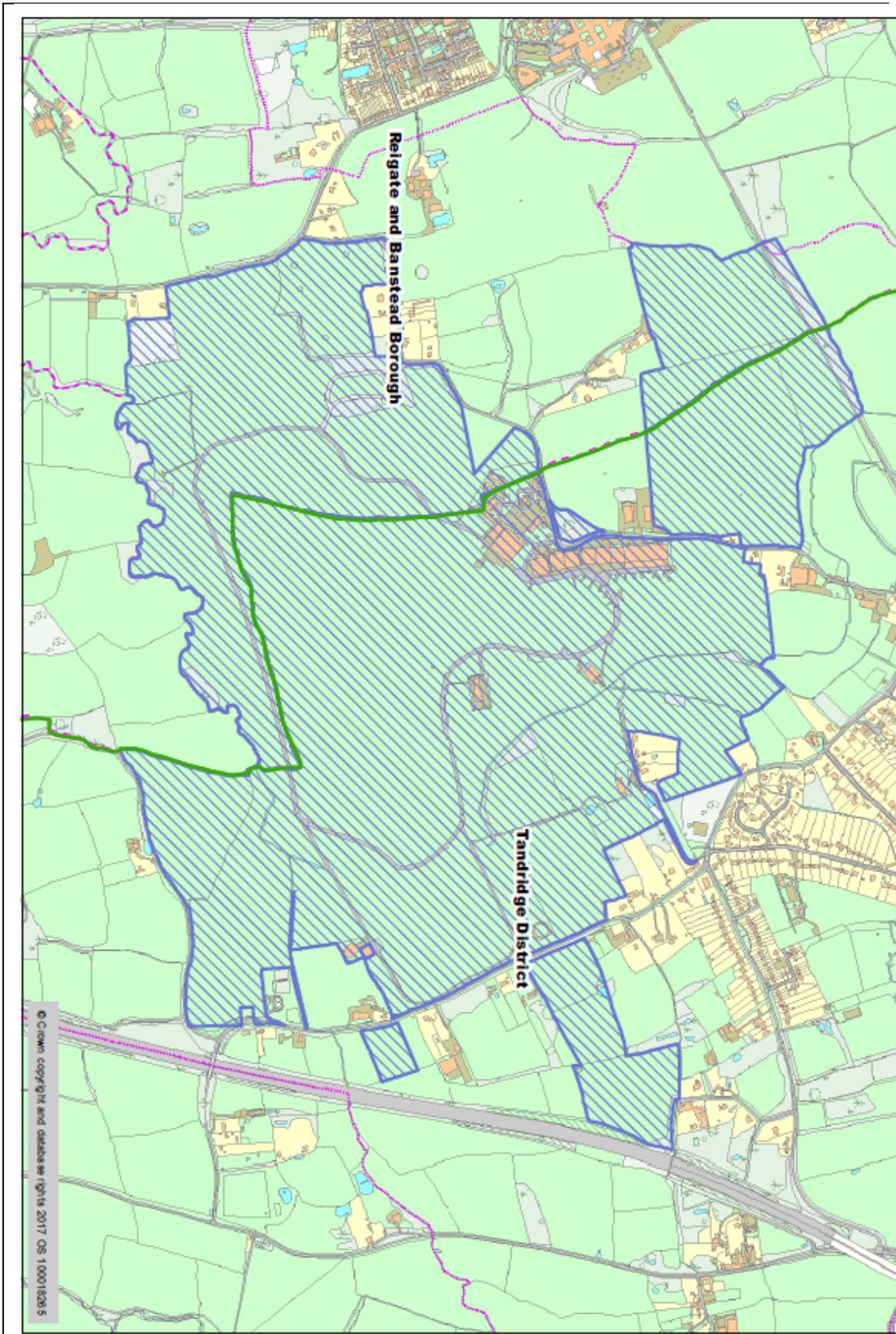
Address	Land at Chaldon, Alderstead and Tolsworth Farm
Gross site size (hectares)	404 (with 142 in Tandridge District and 262 in Reigate and Banstead Borough)
Does this site fall within a broad location that was outlined in the Local Plan: Sites Consultation?	This site does not fall within an assessed broad location and was submitted as a site to the HELAA 2017 as part of the Local Plan: Sites Consultation. This will need to be assessed.
<p>The majority of this site is situated within the Green Belt and is predominantly comprised of agricultural land and some woodland although there are built properties on the site too.</p> <p>This site crosses the district boundary and a large part of the site falls within Reigate and Banstead Borough and adjacent to the London Borough of Croydon. Therefore, cross boundary working would be required to ascertain the potential of this site. Some of the constraints which exist on or adjacent to this site include Ancient Woodland, Rights of Way, Areas of Outstanding Natural Beauty and candidate Areas of Outstanding Natural Beauty.</p> <p> Local Authority Boundary</p> <p> Site Area in Reigate and Banstead</p>	



Address	Land west of Edenbridge (east of Lingfield)
Gross site size (hectares)	236 (with 137 in Tandridge District and 99 in Sevenoaks District)
Does this site fall within a broad location that was outlined in the Local Plan: Sites Consultation?	This site does not fall within an assessed broad location and was submitted as a site to the HELAA 2017 as part of the Local Plan: Sites Consultation. This will need to be assessed.
<p>This Green Belt site straddles the boundaries of Tandridge and Sevenoaks Districts, which is demarcated by the Kent Brook. Therefore cross boundary working would be required to ascertain the potential of this site. The site contains a mix of farmland, a golf course, a former golf course and a number of existing farm buildings. Some of the constraints that exist on or adjacent to this site include Biodiversity Opportunity Areas, Rights of Way and areas of Floodzone 2 and 3.</p> <p>  Local Authority Boundary  Site Area in Reigate and Banstead </p>	



Address	Land at Redhill Aerodrome
Gross site size (hectares)	228 (159 within Tandridge District and 69 in Reigate and Banstead Borough)
Does this site fall within a broad location that was outlined in the Local Plan: Sites Consultation?	This site does not fall within an assessed broad location and was submitted as a site to the HELAA 2017 as part of the Local Plan: Sites Consultation. This will need to be assessed.
<p>This site is in the Green Belt and crosses the district boundary into Reigate and Banstead Borough, with the majority of the land in Tandridge. Cross boundary working would be required to ascertain the potential of this site. Some of the constraints existing on or adjacent to this site include Biodiversity Opportunity Areas, Grade II listed buildings, Buildings of Architectural Importance and areas of Floodzone 2 and 3.</p> <p>  Local Authority Boundary  Site Area in Reigate and Banstead </p>	



Address	Land at South Godstone
Gross site size (hectares)	201.5
Have sites been submitted to the HELAA process that fall within this broader location?	Yes. A number of sites within this location have been submitted to the Council for consideration through the HELAA were considered in the HELAA 2016, but were not included in the Local Plan: Sites Consultation as they were considered to be unavailable at that time.
<p>This is an area of Green Belt within which falls the settlement of South Godstone. A railway line runs through the centre of the area (east to west), as does the A22 which runs north to south. Some of the constraints existing on or adjacent to this area include Ancient Woodland, Ancient Monuments, County Sites of Archaeological Importance, Areas of High Archaeological Potential, Rights of Way and potential Sites of Nature Conservation Interest.</p> <p>Information on the Landscape Capacity of this area is set out in the Landscape and Visual Assessment – Concept Areas 2016.</p>	

