

# Sustainability Appraisal & Strategic Environmental Assessment

Development Management and Site Allocations  
DPD

**REVISED SCOPING REPORT**

June 2009



**Scoping Report**

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## Development Management and Site Allocations Development Plan Document DMSA DPD

The scoping report for the DPD is contained in two documents, one has been prepared specifically for the DMSA DPD, and the other is a general baseline document that can be used for any appraisal.

**Baseline Data Report** – this report provides the data for the whole Borough and is not specific to the DPD in question. This report will be updated approximately every 3 years.

**DMSA DPD Scoping Report** – this report draws on the Baseline Data Report and also any relevant evidence base currently available. This document has been prepared specifically for the Sustainability Appraisal / Strategic Environmental Assessment of the DMSA DPD.

### About the DMSA DPD

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#### **Aim**

The purpose of the DMSADPD is to facilitate the implementation of the Core Strategy Spatial Strategy for the Borough up to 2026 by;

- meeting the Spatial Objectives set out in the Core Strategy;
- expanding upon existing Core Strategy policies
- introducing new policies which alongside the Core Strategy and the Redhill Area Action plan will result in a complete Local Development Framework;
- and localising existing national and regional policies.

The DPD will address the following issues:

- More detailed policies to develop the spatial approach in the Core Strategy to the allocation and management of development
- Concentration of development in sustainable locations including a sequential approach to the allocation and location of all types of development.
- Through a graduated residential density policy - identification of appropriate density levels, for residential development, at specific locations within the borough (to include explanation of the factors that will influence these densities).
- The Definition of local distinctiveness – key characteristics of specific areas of greatest development pressure within the borough.

A suite of generic development management policies that can be used to assess all forms of development. To include:

- generic advice on design 'good practice' guidance for new development, extensions or changes of use.
- The need for development proposals to respect their local context and enhance character of an area (not necessarily replicate).
- Identification of principal design objectives for specific locations.
- That development realises opportunities for environmental enhancement.
- Identification of areas where specific environmental effects need to be addressed i.e. flood, air quality, noise, etc
- Sustainability issues, including use of design to combat/adapt to climate change and incorporation of renewable energy sources.

Specific policies on a topic-by-topic basis which are not covered in the policies above and need a local context.

- Valued landscapes and natural environment including management of the natural environment including green infrastructure.
- Valued townscapes including heritage management and transport issues.
- Valued people – including employment, town centre, leisure and community facilities policies.

Provide guidance on specific regeneration projects. To include:

- Preston regeneration area.
- Merstham regeneration area.
- Horley Town Centre

Specific proposals for the allocation of development locations across the borough for all land uses to facilitate the spatial approach to future development to 2026. These will generally have supporting policies in the sections above however they will also need to be allocated on the proposals map. The main areas that will need future allocations include:

- Housing (large allocated sites and strategic locations for smaller sites).
- Employment.
- Leisure

- Community facilities
- Valued landscapes and natural environment
- Valued townscapes including historic features
- Waste Facilities (as designated in the Surrey Waste Plan)

## Foreword on the Sustainability Appraisal

### Purpose and Process

This foreword is provided for those unfamiliar with the process of Sustainability Appraisal. Consultees familiar with the process and purpose of a Scoping Report are advised to turn to page 13, 'Note to Consultees'.

## Purpose

Sustainability Appraisal involves the identification, consideration and reporting of the likely impacts of planning proposals on social, environmental and economic interests. It is a required process by virtue of Section 19(5) of the Planning and Compulsory Purchase Act 1994. Planning Policy Statement 12<sup>1</sup> confirms that where the process is compatible with the Government Guidance on Sustainability Appraisal<sup>2</sup>, it also meets the requirements of the SEA Directive<sup>3</sup>.

The first step of appraisal is to set out a detailed description of the three elements of sustainability: the social, environmental and economic conditions within and affecting the Borough. By considering reports, studies and data on various aspects of these topics a broad picture can be established with respect to sustainability issues.

The next step of appraisal is to identify the development needs of the Borough and to consider the regulations and guidance that set the context and parameters for delivering those needs. For the Reigate and Banstead Local Development Framework (LDF) this is predominantly through a consideration of the South East Plan and the Planning Policy Statements issued by the Government.

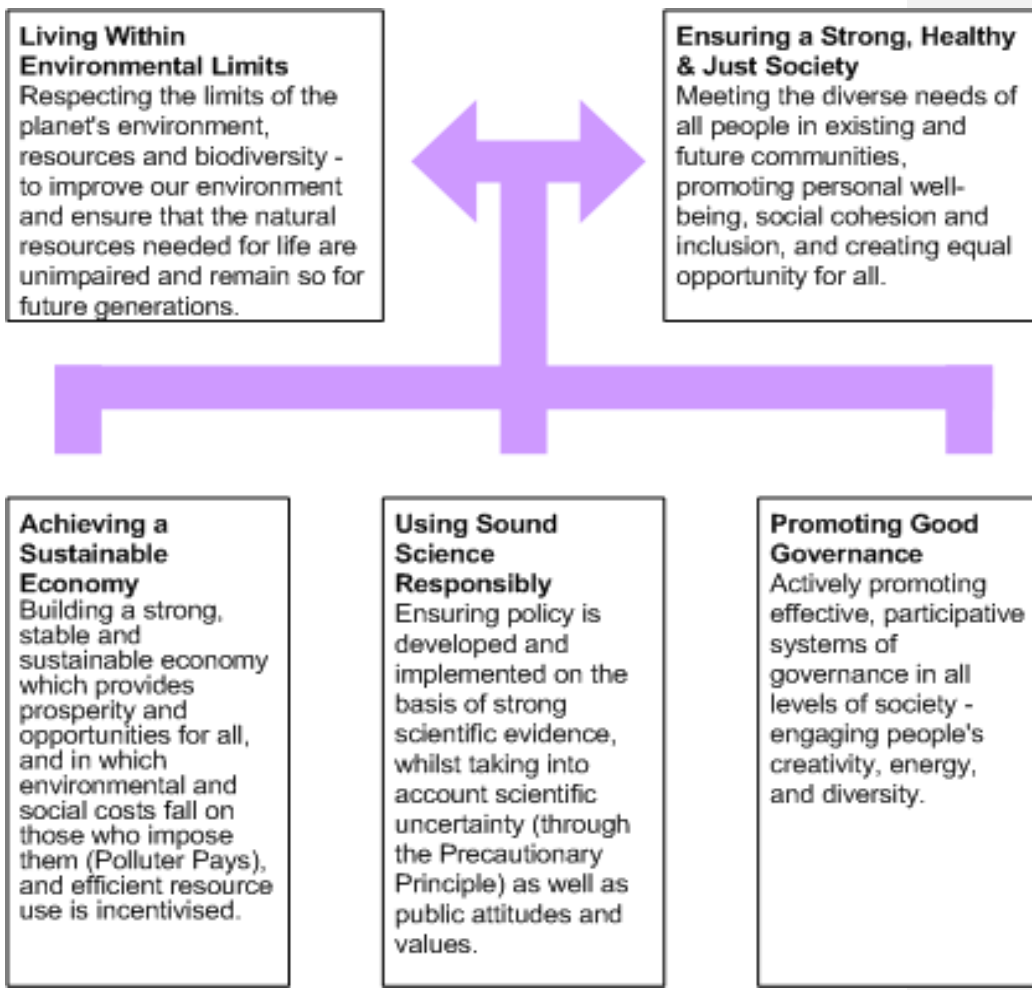
The objective of Sustainability Appraisal (SA) is achieved by bringing these two strands together: by considering the development needs of the Borough, given the legislative parameters, within the context of current social, environmental and economic conditions, it is possible to identify the most sustainable patterns and nature of development for the Borough.

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<sup>1</sup> Planning Policy Statement 12: Local Development Frameworks, ODPM 2004

<sup>2</sup> Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks, November 2004

<sup>3</sup> European Directive 2001/42/EC on the assessment of the effects of certain plans and programmes



## Process

The process of undertaking SA involves progressive stages as illustrated in Diagram 1, below.

Diagram 1

Diagram 1 illustrates how SA begins by describing the social, environmental and economic conditions for the Borough and considering development needs in this context (1). In this way, different strategies, policies and allocations can be identified whereby development needs can then be met (2). These are then considered, more formally, in the context of a Sustainability Appraisal Framework (3).

Formal Appraisal itself (3) involves the use of a Sustainability Appraisal Framework against which options for development (2) are considered. The SA Framework comprises a set of sustainability objectives (SA Objectives) that are based on the key

sustainability issues. They are derived from a consideration of the sustainability baseline for the Borough and the social, environmental and economic objectives and parameters set by legislation. The SA Framework is set out as Table 1 on page 37 of the Scoping Report.

SA Objectives within the SA Framework cover broad subjects such as 'housing' and 'pollution'. In order that the key issues can be examined in detail, each of these objectives is supplemented by decision aiding questions. The decision aiding questions pick up on the principle issues that need to be addressed in sustainability appraisal for the subject in question. For housing this might be to ask whether the proposal is likely to support the delivery of affordable properties for key workers. By answering the questions for each SA Objective the predicted impact of proposed strategies, policies, sites and actions can be recorded for further consideration. The use of decision aiding questions also helps to ensure predictions are objective and to ensure consistency in the process. The decision aiding questions are set out in Table 1, page 37. In this way appraisal can be used to inform the choices of which strategy, policy, site or action is to be taken forward.

Following this initial appraisal, actions for meeting the development needs can be proposed (4). This might provide details of the overall planning strategy for the Borough, planning policies for judging development proposals, potential development sites, and detailed advice on specific subjects such as how planning contributions can be used to help fund infrastructure; and be in the form of a draft Development Plan Document (DPD) or draft Supplementary Planning Document (SPD).

Appraisal does not end here, however, since the adopted DPDs and SPDs are then monitored with respect to the achievement of their stated objectives and with respect to the impacts that result from their implementation. Monitoring, in turn, informs the need to amend policy to improve performance.

Scope of Sustainability Appraisal

## Scoping Process

Setting the scope for Sustainability Appraisal (SA) begins with a description of the social, environmental and economic conditions of the Borough (1a in Diagram 1). This is achieved by reviewing reports, studies and data from a variety of sources. Some reports and data are produced by the Council, but many are the responsibility of external agencies such as Natural England, the Surrey Wildlife Trust and Government departments. Reports and studies produced by the Council and other Government Agencies include the Borough Wide Character Assessment, Strategic Flood Risk Assessment, Accessibility Mapping and the National Statistics<sup>4</sup>; and Council planning documents such as the Planning Obligations and Infrastructure SPD. A full list of documents referred to is listed in Appendix 1 to the Scoping Report.

The information collated from these documents is complemented by a detailed baseline comprising data for over 50 different sustainability indicators. The subjects covered by the indicators range from the proportion of affordable housing provided in the Borough to the accessibility of different services by public transport as well as statistical information about the condition and size of important habitats. This baseline of largely empirical data is derived from internal and external sources. These include the LDF Annual Monitoring Report, the Government's Area Profiles and Best Value Performance Indicators. The data gathered from this exercise has been collated into a separate document: the 'Sustainability Baseline Report, October 2008', which is available on request.

This mixture of reports and empirical data provides a detailed picture about the sustainability attributes of the Borough as well as identifying the wider context for sustainability at the national level. Whilst the documents and databases are available to read in full, the role of scoping (this Report) in the appraisal process is to summarise this information so that key trends and sensitivities can be identified for further consideration.

The review has included European, national and regional legislation, strategies, programmes and guidelines. These documents provide additional information about sustainability, but more importantly these documents set requirements and parameters for development. The documents reviewed range from EU Directives that are required to be adhered to by law, such as the Water Framework Directive

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<sup>4</sup> [www.nomisweb.co.uk](http://www.nomisweb.co.uk)

(2000/60/EC) which provides the basis for laws to protect against water pollution; through the series of Planning Policy Statements and the South East Plan, which sets out targets such as the amount of housing to be built in the Borough by 2026; to guidance documents produced by the UK Government, such as the Code for Sustainable Homes which advises developers with respect to sustainable design practices. A full list of these documents is provided as Appendix 1 to the Scoping Report.

Through consideration of the baseline conditions and requirements of other plans, programmes and strategies, the Scoping Report is able to describe the context for sustainability and begins to identify the key issues to be addressed in the Local Development Framework (LDF).

A fundamental role of the Scoping Report is to establish the Sustainability Appraisal Framework. This reflects the context of sustainability and provides a standard methodology for considering the impacts of proposed actions. It is against this SA Framework and on the basis of the key issues identified, that proposed actions will be judged and, consequently, predictions made about the likely significant social, environmental and economic impacts. The SA Framework is set out as Table 1 on page 37.

#### Note to Consultees

~~A review of sustainability data and reports and of the requirements and guidance in other legislative documents, programmes and plans has been completed by Planning Officers at Reigate and Banstead Borough Council. A list of all documents and data sources that have been referred to is provided as Appendix 1 to this Scoping Report.~~

~~The key issues arising from that review are described in this Report and it is intended that that these issues will form the basis for a Sustainability Appraisal of the Local Development Framework. As a consultee you are requested to consider the following account and, where relevant to the remit of your organisation, comment with respect to whether the scope is appropriate for the appraisal of planning documents for the Borough. Should you disagree with any conclusions or consider that important issues have been omitted, please provide detailed reasoning and provide evidence, or a reference to evidence, to support that view.~~

### Process so far

The Preliminary Scoping Report was consulted on from 2 July 2009 until 13 August 2009. The report was sent to the statutory consultees and other organisations considered appropriate. A list of consultees can be seen in Appendix 3. The responses were analysed and used to revise this report. The responses can be found in Appendix 4 of this Scoping Report, along with the table of changes made.

~~Sustainability Appraisal will consider all sustainability issues by virtue of the SA Framework, which is set out in Table 1, page 37, of this Report and you are reminded that the purpose of scoping is to identify 'likely significant' sustainability issues. It would be most beneficial to the Council, therefore, if you could concentrate on the big issues. Furthermore, it is essential that you provide clear, evidence-based advice so that appraisal can provide a proper analysis of the issues that need to be resolved by the Local Development Framework.~~

~~The purpose of this Scoping Report is to set out for verification by consultees, the likely significant issues that should be considered in detail through Sustainability Appraisal (SA). The subsequent SA would then inform the key decisions that face the Council in preparing a sustainable strategy for development. In order to retain clarity and to focus on the most important issues, the Scoping Report also makes reference to issues that are not considered to be significant. The majority of these issues remain important and future reviews of the scope for SA can re-introduce subjects should circumstances change.~~

### **Questions for consultees to consider**

~~Q1. Does your organisation collect any data/information that would be helpful to the SA process and monitoring of R&BBC LDF documents?~~

~~Q2. Does your organisation agree with the key sustainability issues identified for the Borough which are relevant to your area of expertise/responsibility?~~

~~Q3. If not, which other issues to you consider should be included?~~

~~Q4. Does your organisation agree that the objectives, baseline information and key sustainability issues identified provide an appropriate basis for the appraisal of the DMSA DPD?~~

~~Q5. Does your organisation consider the baseline information is relevant and accurate?~~

~~Q6. Is there any further baseline/data that should be added? (Please specify where data source is available)~~

**Q7. Have all the relevant policies, plans and programmes been included?**

## Overview and Summary of the Likely Significant Impacts

The Borough of Reigate and Banstead comprises a number of towns and villages set within attractive countryside stretching either side of the North Downs escarpment. The North Downs forms part of the Surrey Hills Area of Outstanding Natural Beauty, which is a landscape of national importance. Banstead Woods, Chipstead Valley, and Walton and Reigate Heaths are also areas of notable landscape and wildlife value. The majority of Reigate town centre is recognised for its historic and architectural qualities as a designated Conservation Area, as are the older village centres such as Merstham and Walton-on-the-Hill.

With close proximity to Greater London to the north and Gatwick Airport to the south and with the Borough crossed by the M25 and M23 motorways, the Borough experiences heavy traffic and some areas suffer from congestion and, consequently, poor air quality. Considerable development pressures exist and the Borough has been identified as a New growth Point with significant development proposed for Horley and Redhill.

Agriculture is the predominant land use in the Borough's countryside, although golf courses and horse keeping now occupy some areas previously used for farming. The countryside contains large areas of open commons and woodlands to which the public have access, alongside a variety of institutions in large grounds together with scattered commercial, recreational and residential properties.

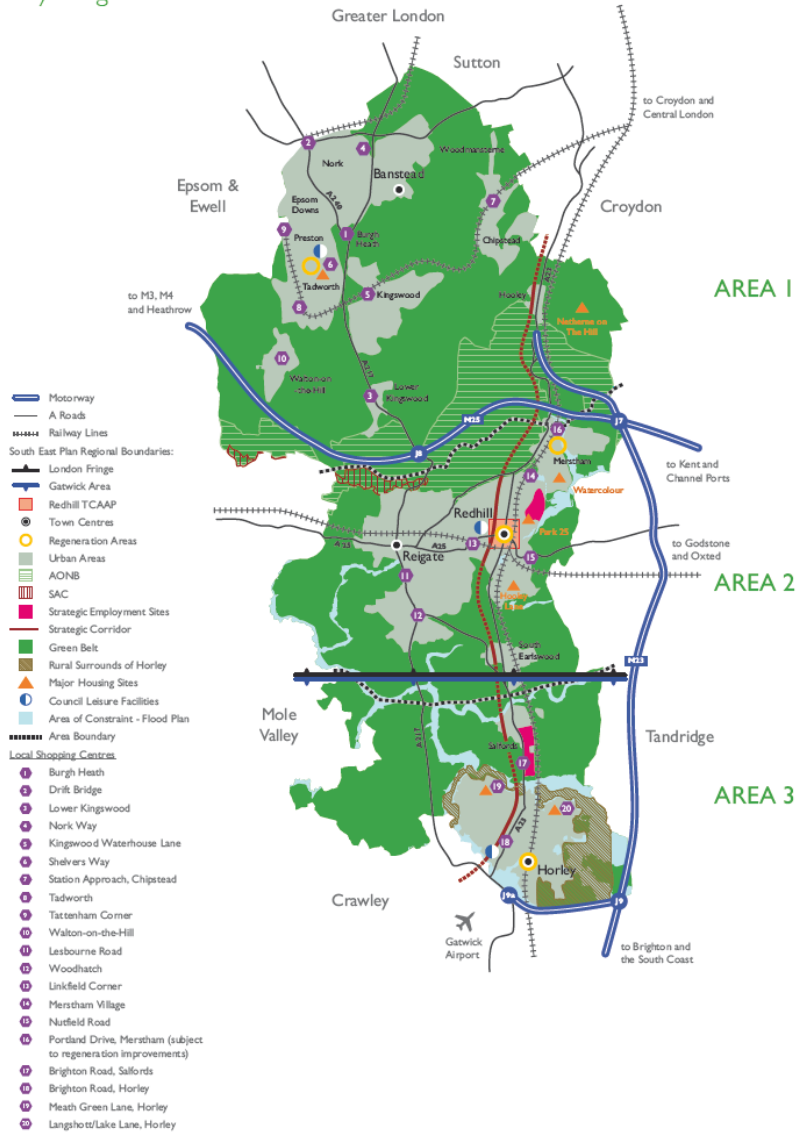
In addition to major landscape and habitat restrictions, the countryside has areas that are liable to flood. Flooding presents a more significant problem in urban areas, however, particularly at Redhill and Horley.

With substantial environmental constraints and a problem with traffic congestion in urban areas, a key issue for sustainability appraisal is to examine how to balance the provision of housing at high densities and close to services without exacerbating congestion and air pollution, and to avoid adverse impacts on the quality and character of the built environment. A key sustainability aim is to ensure that development brings with it a strategic network of green infrastructure that provides a raft of cost cutting benefits to the Borough. (SR8/1)

This Scoping Report sets out the key issues to be considered in SA under the following headings:

Housing, Sustainable Communities, Accessibility, Health and Well Being, Economy, Biodiversity, Climate Change

Key Diagram



## Housing

The Borough has been granted New Growth Points Status (NGP) to consolidate and enhance the role of Redhill/Reigate as a transport hub and focus for services in the eastern part of the London Fringe sub-region. The East Surrey Strategic Housing Market Assessment reports that the scale of demand and need for housing in the area is significant and intimates that a high level of growth will help deliver sufficient affordable housing. The South East Plan considers that the Borough can also play a role in supporting economic growth in the Gatwick sub region.

The South East plan states that a total of 10000 houses should be delivered between 2006 and 2026 at an annual average of 500. As a NGP additional funding will be made available towards infrastructure. The Infrastructure Requirements Position Statement, June 2008 has not identified any major concerns in terms of the adequacy of infrastructure to support this level of development.

Only limited scope exists for the physical expansion of the two main towns, Redhill and Reigate, due to the constraints of the Green Belt and the Area of Outstanding Natural Beauty. The Council's housing trajectory shows that 10000 can be delivered without the need for a Green Belt review. A Green Belt review may be undertaken in the future, but at present it is recognised that urban regeneration should not be discouraged by the unnecessary release of greenfield sites. The Housing Position Statement anticipates that a surplus of dwellings can be delivered between 1 April 2007 and 31 March 2022 on previously developed land (PDL), mainly in Preston, Merstham, Redhill and Horley. This would also meet the target for the Borough in the Surrey Structure Plan that 90% of new residential development is on pdl in the urban area. It is noted in the Baseline Report<sup>5</sup> that this has been achieved in the last two years.

A key issue for consideration in SA will be whether and how sufficient sites with high densities can be delivered without causing detriment to the environment or exacerbating congestion. Appraisal will draw on the Borough Wide Character Assessment<sup>6</sup> which considers the restrictions, problems and opportunities presented by accessibility, noise, and air quality; and the sensitivity of areas to development in terms of their character, biodiversity and flood risk.

The Baseline Report indicates that air pollution in most areas of the Borough is below Government limits for all pollutants and that the overall trend is predicted to be downward due to efficiencies in car engine technology. The trend for new developments and redevelopments to tend towards a higher concentration of

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<sup>5</sup> Sustainability Appraisal Baseline Report, October 2008

<sup>6</sup> Borough Wide Landscape and Townscape Assessment 2008

residential units and the continuing pollution from aircraft in the vicinity of Gatwick may, however, result in exceeding target levels for NO<sub>2</sub>. This could have an adverse impact on human health and on sensitive habitats and these subjects are discussed in more detail in the sections 'Health and Well Being' and 'Biodiversity'.

Whilst design techniques can usually be employed to satisfactorily develop noisier areas and the Borough Wide Character Assessment reports that 'within the context of the size of the study area noise is not generally a major constraint upon development', the Borough survey published in November 2006 indicates that the public consider noise to be the most significant negative environmental impact. The most annoying noise was associated with transportation. Areas where noise could be a constraint include near the M23, M25, A217 and Gatwick Airport.

Concern is expressed in the Baseline Report that Redhill Town Centre has a poor range and quality of shops and poor quality public realm and the SA should consider the role of housing and mixed-use development in addressing this. In addition, redevelopment could address improvements with respect to flood risk, open space and biodiversity as well as human health through the application of green infrastructure. The Character Assessment reports that opportunities in Reigate in this respect are more limited since the heritage of the centre is more sensitive to change.

The Supplementary Planning Document (SPD) for the regeneration of Horley Town Centre seeks to improve vitality and viability of the town centre through the delivery of town centre housing and mixed-use development. An important aspect of the strategy will be to consolidate good public transport accessibility by bus and rail to address air quality issues since the southern part of the town centre lies within an Air Quality Management Area. Development may be constrained by airport safeguarding requirements and the need to retain and provide adequate open space.

As two of the most deprived wards in Surrey, the Council's Corporate Plan identifies Preston and Merstham as areas for regeneration. Whilst this is discussed in detail in the section titled 'Sustainable Communities', it is noted that problems include retail, leisure and community facilities of low quality, areas of open space and amenity space in need of improvement and relatively poor public transport.

The Character Assessment reports that Merstham is a more varied settlement that includes a high quality conservation area on the western side of the railway, although it is generally of low sensitivity to change. Whilst some of the regeneration area falls within 800m of Merstham station, most of the area is outside the 30 minute travel contour to Redhill town centre.

Within the remainder of the urban area opportunities for large scale redevelopment are limited due to the largely residential, consolidated nature of development and the high sensitivity of much of the Borough's townscape. Where small and medium scale development is proposed key issues would be the need to protect, maintain and

enhance special and valued characteristics and to improve the quality of places through good design.

The South East Plan advocates a sustained programme of action to stabilise the ecological footprint of the Region by 2016 and reduce it by 2026. In addition to locational considerations discussed above, implementation of the standards set in the Code for Sustainable Homes will be central to the achievement of this objective. The impact on viability of the costs of sustainable design in addition to the requirements for other contributions may be an issue for the housing building industry.

The Government's Design Guide 'By Design' and 'Secured by Design' advocate design which embraces community safety, integrating uses and transport, ease of movement, character and local distinctiveness. SA can act as a checklist to ensure policies are adopted that require consideration of layout, densities, mix of uses, scale in relation to surroundings as well as materials, detail, landscape and ecology/green space, but it is considered that the role of SA in examining detailed design issues in a strategic SA is limited. For this reason, matters such as light pollution, noise, crime and the application of sustainable design to an individual property are not considered significant issues for SA.

#### Key issues for consideration in Sustainability Appraisal

The Housing Position Statement anticipates that with respect to the indicative minimum housing requirement of the South East Plan a surplus can be delivered between 2006 and 2022 on previously developed land. After this date the implications of the South East Plan setting the annual housing target as a minimum are difficult to predict.

A key principle in deciding locations for major development will be to reduce the need to travel, particularly by car and since high density redevelopment is likely to be required, SA will need to consider the impact on congestion and avoiding adverse impact on local character, health and well being. Of primary concern for SA will be the ability to deliver sufficient affordable and extra care homes in accessible locations and the incorporation of multi functional green infrastructure.

If Greenfield sites were required to meet need in the longer term, key additional considerations would be landscape impact, accessibility and flooding. The Borough Wide Character Assessment will inform SA in this respect.

The following decision aiding questions have been included in the Sustainability Appraisal Framework (Table 1, page 37) to provide a focus for SA with respect to the key issues.

Will the option deliver new development on previously developed land?

Will the option support meeting affordable housing targets?

Will the option increase the amount of extra-care housing?

Will the option provide good access to services and facilities?

Will the option ensure good access to open space?

Will the option support the use of public transport, walking and cycling?

Will the option avoid adverse impacts on important habitats?

Will the option avoid an increase in actual flood risk?

Will the option avoid adverse impacts on important landscapes?

Will the option be compatible with local character?

### **Sustainable Communities**

PPS12<sup>7</sup> advises that the LDF should work alongside the Sustainable Community Strategy in guiding and shaping the delivery of sustainable communities. The Local Government White Paper<sup>8</sup> considers this integration to be central to ensuring that the crosscutting issues of the economic future of an area, social exclusion and climate change are addressed. The Community Plan identifies as key priorities the continued protection, but better use of the countryside, open spaces and parks; improved waste management; improved accessibility; homes to suit the changing needs of the Borough's population; safe, inclusive communities; and well planned services.

The Baseline Report describes Reigate and Banstead as a largely successful, affluent Borough, but indicates that deprivation has been identified in areas, typically where there are high concentrations of Rented Social Landlord tenures and where more than 40% of the population lack access. The Baseline Report notes that school attendance and academic achievement in deprived areas are lower than average and that participation in further education drops markedly beyond the age of 17. Whilst Preston and Merstham have been identified as two of the most deprived areas in Surrey, Redhill West, Horley West and Horley Central also suffer from deprivation. The role of the planning system may be limited in addressing deprivation, however, since the key issue appears to be education and the balance of skills available in the Borough to employment opportunities.

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<sup>7</sup> Planning Policy Statement 12: Local Spatial Planning

<sup>8</sup> Strong and Prosperous Communities - The Local Government White Paper, 26 October 2006

Fuel poverty, the proportion of households who have to spend more than 10% of their basic income on fuel, is a further matter for concern. National statistics<sup>9</sup> indicate that the numbers in fuel poverty across the UK for 2006 indicate a rise due to increased costs. Redhill West, Reigate Central and Preston are identified as the three wards with the highest fuel poverty in the Borough. Addressing this issue is closely linked to the Climate Change agenda.

PPS1<sup>10</sup> and PPS3<sup>11</sup> advocate that settlements should comprise a range of housing types and community facilities with good access to jobs, key services and infrastructure. The Planning Obligations and Infrastructure SPD seeks to support this objective by requiring contributions towards highways, transport and travel schemes, education, libraries, recreation, community centres and recycling as appropriate. Appraisal can help identify priorities for using the proposed additional funding for infrastructure.

Emerging evidence highlights the impact of sport in relation to creating stronger communities and addressing issues of community safety. The South East Plan emphasises the importance of accessibility to open space and green infrastructure. At Borough level, Local Community Action Plans for Nork and Tattenhams seek to address the provision of communal space and provision of youth as a priority.

Accessibility to open space and leisure will be a key issue for SA and consideration can draw on the findings of accessibility mapping and the PPG17<sup>12</sup> Audit.

The CLG<sup>13</sup> document Sustainable Communities: Homes for All, 2005 seeks to ensure an adequate supply of affordable housing, to improve homes to the Decent Homes Standard and to ensure that the needs of mixed sustainable communities are met. The Council's Housing Strategy 2006-09 supports these objectives and appraisal will need to consider the ability to deliver affordable housing, particularly with respect to meeting the growing demand for extra-care housing for the elderly.

Within Surrey, there has been widespread concern that market demand for larger, executive style housing is excluding not only those most in need, but also families who require two or three bedroom accommodation. The Surrey Structure Plan requires that 70% of homes are to have less than four bedrooms. The Sustainability Appraisal Baseline Report, October 2008, indicates that more small properties are being delivered but the affordable housing target is not being achieved. Appraisal will need to consider that the continuing shortfall in affordable housing can have a negative impact on other sustainability objectives relating to travel, the economy (recruitment), health and social inclusion.

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<sup>9</sup> Fuel Poverty Group Sixth Annual Report

<sup>10</sup> Planning Policy Statement 1: Delivering Sustainable Development

<sup>11</sup> Planning Policy Statement 3: Housing

<sup>12</sup> Planning Policy Guidance Note 17: Planning for Open Space, Sport and Recreation

<sup>13</sup> Department for Communities and Local Government [www.communities.gov.uk](http://www.communities.gov.uk)

The East Surrey Gypsy and Traveller Needs Assessment<sup>14</sup> reports that extra pitches are required in the Borough. Whilst the Green Belt designation has historically represented an obstacle to finding suitable sites it is not considered that this level of provision is significant with respect to the sustainability appraisal of the LDF.

In recent years Surrey has consistently been one of the safest areas of the country with the lowest recorded crime rate in England. It is considered that supporting a reduction in crime can be achieved through following the principles of guidance such as Secure by Design and the issue is not, therefore, a significant matter to be addressed in sustainability appraisal.

Similarly, the Surrey Local Transport Plan reports that road safety across Surrey is improving for all modes of travel, except motorcycling, although it remains a significant cause for concern amongst residents and is frequently cited as the major barrier to increased levels of walking and cycling. Again, design solutions are the key issue and it is not considered to be a significant issue for SA.

A final element in delivering sustainable communities is local distinctiveness. In its 2001 statement 'A Force for Our Future', the Government emphasises the potential for the historic environment with respect to regeneration, tourism and social exclusion. The historic environment should be seen as more than designations and development decisions should be based upon an understanding of the wider historic environment and its impact on the character and distinctiveness of areas. The ability to incorporate Listed Buildings, Conservation Areas, Ancient Monuments, sites of Archaeological Importance and Scheduled Ancient Monuments will be a matter for consideration in SA in the strategic sense and the Borough Wide Character Assessment will inform this. Detailed design matters are not, however, considered to be significant issues to be examined in SA.

#### Key issues for consideration in Sustainability Appraisal

The priorities and issues raised in PPS1, PPS3 and the Reigate and Banstead Community Plan set a clear scope for SA. The key issues are to support access to services and to leisure and recreation opportunities and improving the match between skills and local employment opportunities. Whilst infrastructure is important, no significant concerns have been identified and the scope of SA should be limited in this respect.

Safety and fuel poverty are important, but it is reasonable to assume that this can largely be delivered in new development through the implementation of the Code for Sustainable Homes and the design principles of PPS3, By Design, the Surrey

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<sup>14</sup> East Surrey Gypsy and Traveller Needs Assessment 2006 to 2016, May 2007

Design Guide and Secured by Design. The ability of the planning system to address fuel poverty in existing properties is dependent on the development of district heating and the SA will consider within the scope of the issue of Climate Change.

The following decision aiding questions have been included in the Sustainability Appraisal Framework (Table 1, page 37) to provide a focus on the key issues.

Will the option improve access to key services (education, employment, recreation, health, community services, cultural assets)?

Will the option improve the provision of public transport?

Will the option improve participation in further education?

Will the option continue to protect and/or enhance the Borough's cultural assets?

Will the option improve equitable access to the Borough's cultural assets?

Will the option protect and enhance the Borough's natural urban greenspace?

Will the option enhance access to natural urban greenspace?

## **Accessibility**

The Borough enjoys excellent rail and road links to service centres, with the London to Brighton transport corridor of the M23, the A23, the A217 and the Brighton main railway line running north to south through the administrative area. The M25 London orbital route runs east to west with a junction exiting at Reigate (Junction 8). In the Borough, the Highways Agency strategic road network comprises the M25 and the M23 which runs across the north-east corner of the Borough and a small section of the A23 at Hooley which runs north to south from London. The section between M23 junction 9a and Gatwick North Terminal runs along the Borough's boundary.

The Baseline Report and accessibility mapping indicate that access to services is generally good, but problems exist due to congestion and pockets where public transport is poor, car ownership relatively low and access to services on foot or by cycle are limited. A key consideration of sustainability appraisal will be how the LDF can address access to local facilities, including shopping facilities at designated local centres and smaller centres; employment opportunities; primary schools; GP

surgeries; and open spaces<sup>15</sup>/recreational facilities. The Infrastructure Statement advocates a flexible approach to co-locate mixed use community services to assist in enabling the delivery of local, efficient services, which are vibrant and appealing to users of libraries, day centres, youth services and public conveniences, with an increasing role in some areas for the voluntary sector. [A strategic network of green space would facilitate accessibility to open space for residents in all areas of the Borough. \(SR8/3\)](#)

Despite good access to the Borough's rail network to London, Gatwick, Brighton, Kent, Guildford and Reading the majority of commuters (64%) do so by car. In general, the railway network is strained with the Brighton to Victoria railway line at capacity and the Baseline Report identifies that the high level of car ownership and use conflicts with the achievement of reducing congestion. The cost of delay due to congestion and of accidents to the Surrey community is substantial and, in addition, the environmental consequences are a matter of concern with increased noise, carbon dioxide and air pollution being experienced, as well as having an impact in terms of visual intrusion, severance and reduced road safety for all road users.

Substantial parts of the Borough fall within the 10 and 20 minute walk-in zones to local centres. This is true of most of Horley, Reigate, Redhill and Banstead. However, the Borough Wide Character Assessment reports that many smaller settlements fall outside or on the fringe of the indicative 20 minute walk-in zone. The Borough's town centres can also be reached by cycle, but cycling generally has a low mode share. The stations can be accessed by bus and cycle, and the importance of encouraging these modes is recognised. Many people access the Borough's rail network by car. Provision of car parking at stations is an important issue in encouraging people to use the train. The Surrey Local Transport Plan has set the target of increasing the number of bikes parked at selected rail stations by 25% between 2004 and 2010.

A reasonable network of bus routes exists throughout the Borough and are, in some cases, under utilised. Evening and Sunday services are, perhaps as a consequence, minimal. Delays due to congestion lead to unreliability and encourage car use. Improvements have been delivered, however, with the Fastway service being extended from Crawley to Redhill.

At a different level, high levels of car reliance have continued to be a factor in the social exclusion of the 14.9% of families in the Borough who have no access to a car. This has also fuelled hyper mobility, with its tendency to undermine communities by reducing social interaction and reduce the level of exercise derived from walking or cycling. It is noted in the Surrey Local Transport Plan that cycling and walking, have not increased over the period 2000-2006.

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<sup>15</sup> See Accessible Natural Greenspace Targets

Improving transport infrastructure is expected to be a priority in the New Growth Points Outline Delivery Plan and. The Infrastructure Requirements Position Statement, June 2008 reports that a focus on accessible areas would provide opportunities to enhance provision in key locations and to deliver integrated provision that seeks to increase the provision of local facilities alongside improving public transport access to existing facilities that might be located further away. Freight interchange facility requirements may need to be considered and this could build on the Freight Quality Partnerships that exist in four other Surrey districts.

The preparation of a Transport Statement for the Borough will inform SA of the impact of the Borough's spatial strategy for housing delivery on the strategic road network and wider networks. Further detailed modelling of transport and accessibility would be required should sites be brought forward in a Borough Wide site specific allocation DPD, otherwise this would be achieved by planning applications being accompanied by a Transport Assessment. An overall framework for evaluation could be established through the Transport Statement. In addition to the locational strategy, Transport Plans and Controlled Parking Zones (CPZs) will be fundamental to increasing the proportion of journeys made by walking, cycling and public transport.

#### Key issues for consideration in Sustainability Appraisal

Redhill and Reigate form an urban area that is highly accessible by road and rail, and the role of Redhill as a transport hub is central to the social and economic objectives of the South East Plan. A key issue for SA will be to consider how options can ensure all communities in the Borough have good access to services and how the LDF can deliver improvements to public transport, walking and cycling in areas with poor accessibility. In this respect SA will be informed by accessibility mapping.

Other centres in the Borough have good access to road and rail and a further key issue for SA will be the relationship between high density development, transport options and congestion. Access to open space and the impact of transport derived emissions on air quality are considered within the subjects Health and Well Being and Biodiversity.

The following decision aiding questions have been included in the Sustainability Appraisal Framework (Table 1, page 37) to provide a focus on the key issues.

Will the option reduce congestion?

Will the option reduce the need to travel?

Will the option improve access by walking/cycling?

Will the option improve access by public transport?

Will the option reduce the need for road freight?

Will the option increase equitable access to services and facilities?

Will the option enhance access to urban greenspace?

### **Health and well being**

Individual as well as combinations of circumstances and behaviour affect the health and well being of the population. Whilst the LDF cannot influence all factors directly, there are core issues that are sensitive to spatial planning and development control decisions. These include access to health care, leisure and recreation; the impact of traffic and energy use on air quality and climate; and the general quality of the environment. Access to affordable housing is also an important factor and this is discussed in the sections titled 'Housing' and 'Sustainable Communities'.

With respect to the delivery of direct health services the Infrastructure Requirements Position Statement, June 2008 reports that major new health infrastructure is unlikely to be required within the Borough as the emphasis moves to a more dispersed pattern of provision at the local level. Nevertheless, opportunities to enhance local healthcare have been identified in Redhill and Merstham where these are to be integrated alongside other regeneration proposals. Elsewhere, contributions are being sought towards GP provision to meet the demands arising from new development on the basis of the Planning Obligations and Infrastructure SPD. A specific need is identified in the Statement, however, for extra-care housing to cater for an ageing population.

The Baseline Report indicates that the Borough has high levels of good health relative to the South East and UK with people tending to lead healthier lifestyles than in other parts of England. Health inequalities exist, however, with significant differences between affluent and deprived areas of the Borough. Whilst poverty is below the England average, over 7,500 people including 2,700 children are living in low income households dependent on means-tested benefits. The life expectancy of women from the most deprived areas of the Borough is four years shorter than those from the least deprived areas. The link between health, income, employment and education is also recognised and is considered in more detail in the section 'Sustainable Communities'.

The Open Space Assessment, July 2008 indicates that the provision of open space across the Borough is reasonable or good with the deficiency in amenity space, green

corridors, natural, semi natural green space and parks compensated by the existence of the Green Belt. The Reigate & Banstead Play Strategy (2007-2010) has highlighted the need for new and improved play opportunities and a fairer geographical spread of opportunities including for disabled children. The Strategy reports that children in the Borough are less physically active than the England average, and it is considered that a high density strategy for delivering housing in existing urban areas could place deficiencies in public open space and play space under further pressure. [In addition to the Green Belt designation the Borough has landscape designations of AONB and AGLV, these have key benefit to the population including benefits to health and wellbeing. \(SR8/10\)](#)

The Baseline Report notes that many useful initiatives have already taken place across the Borough to combat levels of inactivity and car-reliance. The East Surrey Primary Care Trust, for example, runs a Walking for Health scheme and many schools have developed School Travel Plans, although the number of primary aged children being driven to school remains over 60%.

The Baseline Report emphasises how good air quality is vital for human health and the wider environment and that air quality in the Borough is generally good. Unacceptably high levels of pollution do occur, however. The Borough, in common with the rest of the South East, has few major industrial processes to generate air pollutants, but as host to the M25, M23, A25, A23 and A217, road traffic emissions are significant. These are exacerbated by the location of Gatwick airport that is both a major national generator of car journeys and emitter of aviation-related pollutants.

As part of the Government's National Air Quality Strategy, the Borough Council has undertaken a phased review of air quality to identify the most significant pollutants in the air locally, and the areas where they are most prevalent. The Council has declared nine Air Quality Management Areas (AQMAs), although it is predicted that five of these areas will no longer exceed targets by 2010.

Although improvements in car engine emissions are likely to lead to improvements in nitrogen dioxide concentrations elsewhere, the reduction in pollution from road transport within the Horley AQMA (Area 3) is predicted to be 'off set' by the increasing emissions from the airport leading to continuing poor air quality in the south of Horley. Area 6, an individual property on the A217 near Blackhorse Lane, and Area 9, Merstham High Street are likely to still just breach the air quality standard in 2015, whilst on Reigate High Street (Area 8) at least 20 properties will still breach the air quality standard rising to 56 properties depending on the prevailing weather conditions.

Other areas are under consideration for AQMA status as the body of empirical monitoring evidence grows. The most likely of these new AQMAs would be an extension of the existing Reigate High Street AQMA with three further areas for consideration being Merstham High Street, Banstead High Street and Redhill Town Centre.

The Borough Wide Character Assessment reports that within the context of the size of the study area noise is not generally a major constraint upon development since design techniques can usually avoid nuisance. The Borough survey of November 2006, however, identified noise as the most significant negative environmental impact and the most annoying noise was associated with transportation.

Noise is concentrated around transport corridors including the major roads, motorways, rail lines and where aircraft fly low. The population in the vicinity of Gatwick affected by noise<sup>16</sup> has generally decreased since 1990, but has increased slightly in the last five years. The potential for an expansion of aviation in the Borough could have significant cumulative effects on noise and air quality.

It is noted that the European Noise Directive (END) will require noise mapping, the identification of the worst areas and a strategy for improvement. This will require collaboration between all stakeholders to use whatever means to reduce noise exposure.

The Baseline Report notes that light pollution is a problem in the Borough and is getting worse. All areas are affected, in particular where it reduces the quality of the Borough's countryside. The inefficient use of lighting can also be a cause of neighbourhood nuisance and wastes energy. It is considered, however, that light pollution can be controlled by improved design that follows the principles in the Institute for Light Engineers Best Practice Manual and that there are no particular issues that suggest this is a significant in respect of sustainability appraisal.

Similarly, it is considered that safe and healthy homes and neighbourhoods can be delivered by good design that follows guidance in Secured by Design, the Surrey Local Transport Plan, Lifetime Homes Standards and the Code for Sustainable Homes. The layout and design of new development can draw on the experience of the Borough's first Home Zone at Nutley Lane, Reigate.

#### Key issues for consideration in Sustainability Appraisal

The role of the LDF in addressing health and well being is predominantly through supporting good access to health services and leisure facilities, particularly open space, and reducing air pollution. Avoiding development in areas with high levels of noise is important, but the scope with respect to SA is limited since it can largely be resolved by design criteria.

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<sup>16</sup> in excess of 57 dBA,

The following decision aiding questions have been included in the Sustainability Appraisal Framework (Table 1, page 37) to provide a focus on the key issues.

Will the option help improve air quality?

Will the option support specific actions in designated AQMAs?

Will the option minimise exposure to air pollution?

Will the option reduce health inequalities?

Will the option improve access to health provision?

Will the option help people to remain independent?

Will the option enhance access to and quality of recreation?

## **Economy**

The South East England Development Agency (SEEDA) recognises the Borough as a major driver of economic growth for both the London Fringe and the Gatwick Sub-Regions. Redhill, in particular, is a significant employment location and a key interchange between intra regional rail services. The Borough has been granted New Growth Point (NGP) status and significant employment opportunities are expected to benefit the resident population of the Borough.

The Economic Market Assessment, May 2008 reports that the Gross Value Added per employee in the Borough is strong and has steadily increased in comparison to the remainder of the South East in recent years. Employment rates are good and the proportion of knowledge intensive industry relatively high. Business growth and start up rates are, however, slightly below the regional average.

Public Services, finance and other business services make up over 50% of the economy with distribution and retail the next biggest contributors at 15% and 12% respectively. Construction, manufacturing and utilities are each 6%, 5% and 1% respectively. The workforce is generally highly skilled and high earning.

The impact of delays and the restriction of mobility of goods and people caused by congestion are significant. Commuting is high with 27, 317 commuting in from all areas and 33, 500, with London and Gatwick being the primary destinations. 30, 500 live and work in the Borough with 10% of residents presently working at, or mainly from, home.

Significant employment growth in the Borough has led to some recruitment and skills shortages, with the consequence that some employment land has been released to housing. There is a need to protect a stock of employment land, particularly those sites which are sustainably located. Surrey Structure Plan has a target that at least 80% of additional commercial development each year will be located within town centres or at other sites within the urban areas which have good access by means other than the car. The Baseline Report notes that the vast majority of commercial commitments are in Redhill (70% since 1994).

It is considered that a strategy that supports appropriate higher and further education opportunities together with better access to affordable housing would help alleviate congestion by providing the opportunity for greater self containment, but it is recognised that significant investment in public transport is essential.

Redhill is the principal industrial location with a significant supply of larger industrial units, but poor quality stock. Growth in office stock is strong in the Borough and there is a good market for larger units with the market for company head quarters proving particularly lucrative.

The Baseline Report identifies that the majority of commercial activity has been successfully directed to employment areas and that only a three-year supply of office space is available in the Borough. There is a shorter supply of very large sites.

In the short term, increased productivity is likely to require some further commercial development, to supplement and, in part, facilitate a transition to smart growth. This requires additional commercial development to intensify the use of existing sites and minimise loss or damage to environmental capital. More efficient use should be made of existing sites and premises.

The Baseline Report indicates that farming in the Borough is characterised by a large number of small land holdings. The Commission into the Future of Food and Farming emphasises the importance of supporting the production of local products healthy eating, farmers' markets and growing short rotation coppice and other energy crops. However, farmers believe that difficulties in gaining planning permission (cited by 41%) are still the most significant barrier to diversification.

#### Key issues for consideration in Sustainability Appraisal

The Borough has been granted New Growth Point (NGP) status and significant employment opportunities are expected to benefit the resident population of the Borough. A balanced redevelopment of employment sites to facilitate meeting housing needs and the need for commercial property will require a consideration of

reducing the need to travel, particularly by car; improving the availability of locally based skilled workers to better match employment opportunities; and the application of more sustainable design in commercial buildings.

The following decision aiding questions have been included in the Sustainability Appraisal Framework (Table 1, page 37) to provide a focus on the key issues.

Will the option reduce the need for travel?

Will the option increase the likelihood of local jobs being filled by local people?

Will the option encourage mixed-use development?

Will the option facilitate smart growth?

Will the option provide for the needs of economy, especially local business?

Will the option encourage rural diversification?

#### Biodiversity

The Borough contains a variety of sites designated for nature conservation. In total the Borough contains four Sites of Special Scientific Interest (SSSI), which are nationally important and which enjoy statutory protection; there are also two Local Nature Reserves (Earlswood Common and Reigate Heath). An area of the Mole Gap to Reigate Escarpment SSSI forms an integral part of a Special Area of Conservation (SAC). The SAC and SSSIs together cover 5% of the Borough's open countryside and are the Borough's most important sites for wildlife, ranging from the chalk downland of the Chipstead Downs complex in the north of the Borough to lowland heath in Reigate. Sites of Nature Conservation Importance (SNCI) are of County wildlife value and cover approximately 11% with a range of habitats including ancient woodland, wetland and herb-rich grassland.

The percentage of SSIs that are favourable and unfavourable recovering is presently 93%, which compares well with the Government's target of 95% by 2010. (SR8/7)

The Baseline report indicates that 80% of SSSIs in the Borough are in an unfavourable condition, although the vast majority of these are recovering. The Council and other landowners are working with English Natural England (SR8/8) to improve the condition of these sites which require better management. The lowland heathland and woodland at Reigate Heath has been in long-term decline, however, due to lowering of the water table. The percentage of favourable and unfavourable recovering is presently 93%, which compares well with the Government's target of 95% by 2010.

With six European Sites are located within 15km of the Borough boundary it is essential that development has no adverse impact on the integrity of any Special Area of Conservation (SAC) for habitats, or Special Protection Area (SPA) for birds. The Mole Gap to Reigate Escarpment SAC is the major area of concern. A strategy to avoid adverse impacts of NO<sub>2</sub> is being developed on a sub regional basis and this will be informed by Appropriate Assessment<sup>17</sup>.

The value of PDL sites in terms of biodiversity should not be underestimated, however, and SA will also draw on guidance in the Surrey Biodiversity Action Plan with respect to improving urban biodiversity. The potential risk to human health and biodiversity from contamination at PDL sites and costs of remediation should also be taken into account together with the role of buildings as part of the historic fabric of the Borough.

Although the Borough contains a variety of habitats that are designated, this only makes up 16% of the open countryside; much wildlife and many important habitats underpinning biodiversity are not subject to any designation. Urban areas also contain many important habitats and species included in Biodiversity Action Plans and have the advantage of not being subject to intensive agricultural management. Moreover these greenspaces, which support wildlife, may be of great actual or potential importance to local communities: contact with, and access to, wildlife is a significant factor in determining quality of life and wellbeing. This urban biodiversity is considerably enhanced by the presence of gardens; it is significant that this traditional habitat is fast being lost to hard-surfaced parking spaces.

Habitat fragmentation and species isolation is increasing as a result of the pressures of development. An ecologically coherent network needs to be maintained by creating corridors from one habitat to another with statutory and non-statutory sites providing anchor points that can be enhanced and extended. The Habitats Directive encourages the inclusion of policies for the protection, management, restoration and enhancement of landscape features (such as linear and continuous riverbanks and hedgerows, or stepping stones such as ponds or small woods).

The Baseline Report identifies that the number and area of SNCIs, potential SNCIs and LNRs is increasing. An Ancient Woodland Survey in progress and this will inform the SA when available.

The design and layout of new development will play a key role in creating and integrating habitats. This will need to link into a strategy to develop green infrastructure to maximise the benefits of urban open space.

#### Key issues for consideration in Sustainability Appraisal

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<sup>17</sup> Appropriate Assessment considers whether development is likely to have an adverse impact on an SAC or SPA.

The Borough has diverse habitats, the most important of which is the Mole Gap to Reigate Escarpment SAC and Appropriate Assessment will inform SA in this respect. SA will also need to consider the likely impact of new housing on other habitats and maximising opportunities for enhancement through the application of sustainable design and green infrastructure.

The following decision aiding questions have been included in the Sustainability Appraisal Framework (Table 1, page 37) to provide a focus on the key issues.

Will the option secure enhancement in biodiversity in all new development?

Will the option continue to protect formally designated areas of nature conservation?

Will the option create more habitats?

Will the option prevent fragmentation, and increase connectivity, of habitats?

Will the option enhance urban biodiversity?

[Will the option enhance rural biodiversity? \(SR8/9\)](#)

Will the option take account of the effects of climate change on biodiversity?

## Climate Change

The PPS1 Supplement<sup>18</sup> requires development to address the causes and consequences of climate change by minimising the need to travel, particularly by car; reducing the demand for energy; increasing the use of renewable energy; improving the management of water; and avoiding and reducing the exposure to flood risk. Whilst it is difficult to identify the contribution of an individual Borough to the causes of climate change, the Baseline Report notes that in 2001 the Ecological Footprint for the South East was higher than the UK average<sup>19</sup>. The SE Plan makes a commitment to stabilising the Ecological Footprint by 2016, and reducing it thereafter.

<sup>18</sup> Planning Policy Statement 1: Climate Change Supplement

<sup>19</sup> South East 6.09 global hectares, 14% higher than UK average of 5.95

Reducing the need to travel requires a strategy that maximises the ability of residents to access services, facilities and employment locally and this is discussed in detail in the section titled 'Accessibility'.

In the home and office energy is used to heat and cool buildings, provide light and hot water, and power appliances. The availability of electricity supplies cannot be taken for granted, especially in town centres such as Redhill. (SR3/4) The two key issues are generation and efficiency of use. The Borough's housing stock has an average Standard Assessment Procedure, or SAP rating (a measure of a home's energy efficiency) of 54, which is marginally better than the national average. The Baseline Report estimates that the total living in fuel poverty is approximately 7,600 households with the highest risk around Redhill and Reigate. Whilst new homes will be built to Code for Sustainable Homes Level 4 and above and will be more energy efficient, many homes that are energy inefficient cannot be remediated; these unhealthy homes could benefit from being replaced.

With respect to energy generation, the South East Renewable Energy Strategy identifies great potential for biomass fuelled electricity generation in the Borough due to the existing woodland resource and particularly through the development of CHP. The Borough Wide Landscape and Townscape Character Assessment reports that identifying a large-scale biomass plant requires a detailed examination of all the Borough's industrial and employment areas, including those outside the urban area.

Similarly, waste technology could provide localised facilities, close to where waste arises and make a contribution in the Borough. These types of facilities are likely to be located in industrial areas as recommended in the adopted Surrey Waste Plan Core Strategy. Anaerobic digestion of organic waste is, similarly, most likely to be acceptably located in existing industrial or sewage treatment works, or close to landfill sites.

Traffic generation is a possible concern for biomass and waste plant. At a smaller scale there may be potential for this type of energy and/or heat generation at local farms. Purely residential schemes are unlikely to match the constant heat demand load profile required to make CHP viable, but nonetheless can support community heating/cooling systems without generation of electrical power.

Given its close proximity to the eastern edge of Redhill town centre and Holm Thorpe Industrial Estate the concept of co-locating users with high heat demand near sources of landfill gas could be explored. This could provide the basis for the incorporation of CHP in areas with appropriate housing densities and mix of uses. To date, no de-centralised supply of energy, through Combined Heat and Power, is known to exist within the Borough. The large-scale biomass scheme incorporated into Park 25 indicates, however, a future trend in this technology.

The sensitivity of the Surrey Hills AONB and Gatwick airport and unsuitability of flatter areas to wind energy have led the Character Assessment to conclude that the application of this technology is limited. Where proposals arise, SA should consider the implications to landscape, biodiversity and noise.

Photovoltaics and solar thermal technologies can be widely applied although restrictions in designated areas such as AONBs or Conservation Areas will be limiting. A proposed review of the AGLV may lead to a greater area of land becoming designated AONB, and bring with it new rigours of development control. (SR5/2) Opportunities for small scale hydro in Reigate and Banstead are, however, likely to be limited given the lack of watercourses with a significant drop.

In the context of large scale redevelopment, there is considerable scope to integrate microgeneration technologies with CHP and green infrastructure that supports efficient heating and cooling of public spaces as well as interiors and that incorporates green spaces which support play facilities, biodiversity, SUDS and allotments. Any development incorporating CHP should be assessed thoroughly for adverse impacts on air quality. (SR2/2)

The Infrastructure Requirements Position Statement, June 2008 reports that the Borough is within an area of serious water stress, and that additional housing can be accommodated by including measures to reduce demand and increase supply.

The Borough Wide Character Assessment identifies that whilst there is no real flood risk to the north of the Downs, there is a need to ensure that development is carefully managed to prevent any increase in the risk of flooding to properties within Borough downstream. To the south of the North Downs escarpment a relatively large number of homes and businesses in Horley are at risk of flooding from the River Mole, and uncontrolled development within the upper reaches of the catchment, within the adjacent Boroughs of Crawley and Horsham, may increase the frequency and severity of flooding in the town.

A Sequential Approach is set out in PPS25<sup>20</sup> whereby development is considered first in areas at the lowest probability of flooding. Guidance on these matters can be found in, and the Council's SFRA. It is noted that many existing buildings fall within the flood risk zone and redevelopment will need to be assessed carefully. In addition consideration should be given to addressing the risk of flash flooding at locations in Horley and Redhill.

The Environment Agency has produced indicative maps to illustrate the areas at risk of fluvial flooding from an event occurring once in one hundred years (1:100) and once in one thousand years (1:1000). Detailed flood risk maps have been prepared for the Horley area, which also include a 1:100 year event, plus 20% to account for

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<sup>20</sup> Planning Policy Statement 25: Development and Flood Risk

the likely extremes of climate change. This information and a Strategic Flood Risk Assessment will inform SA.

The River Mole and its tributaries are a key characteristic of the Greenbelt areas of the Borough. The future protection of these areas is imperative to retain essential flood storage away from the built up areas of the Borough. The Council's Riverside Green Chain policy is an important contributor to this goal.

#### Key issues for consideration in Sustainability Appraisal

The PPS1 Climate Change Supplement sets a clear agenda for SA with respect to the causes and consequences of climate change. The key issues are minimising the need to travel, reducing the demand for energy, increasing the use of renewable energy, improving the management of water, and avoiding and reducing the exposure to flood risk. Related issues are green infrastructure, fuel poverty and congestion.

The following decision aiding questions have been included in the Sustainability Appraisal Framework (Table 1, page 37) to provide a focus on the key issues.

Will the option secure enhancement in biodiversity in all new development?

Will the option facilitate the generation/use of renewable energy?

Will the option improve energy efficiency?

Will the option reduce demand for energy?

Will the option help to reduce fuel poverty?

Will the option support de-centralised energy generation?

Will the option support the development of CHP?

Will the option reduce the quantity of greenhouse gases released into the atmosphere?

Will the option help in protecting the community from the extremes of climate change?

Will the option increase the ability of the community to become more self sufficient, so as to withstand major weather events?

Will the option reduce the opportunity to adapt in the future?

Will the option reduce the risk of flooding to the development?

Will the option reduce the risk of flooding to adjacent development and others downstream?

**Sustainability Appraisal Framework**

Sustainability Objectives and Decision Aiding Questions		
	<b>Objective</b>	<b>Decision Aiding Questions (likely significant issues)</b>
1	To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	<p>Will the option support meeting affordable housing targets?</p> <p>Will the option increase the amount of extra-care housing?</p>
2	To facilitate the improved health and wellbeing of the whole population	<p>Will the option ensure good access to open space?</p> <p>Will the option protect and enhance the Borough's natural urban greenspace?</p> <p>Will the option enhance access to and quality of recreation?</p> <p>Will the option reduce health inequalities?</p> <p>Will the option improve access to health provision?</p> <p>Will the option help people to remain independent?</p>
3	To reduce poverty and social exclusion.	<p>Will the option improve access to key services (education, employment, recreation, health, community services, cultural assets)?</p> <p>Will the option improve participation in further education?</p>

		Will the option help to reduce fuel poverty?
4	To create and maintain safer and more secure communities.	No significant issues identified
5	To minimise the harm from flooding.	<p><u>See SA Objective 17 Will development increase the risk of flooding? (SR9/3)</u></p> <p><u>Will the option increase the risk of sewer flooding? (SR7/3)</u></p> <p><u>Will the option deliver improvement to surface water management? (SR9/1)</u></p>
6	To improve accessibility to all services and facilities	<p>Will the option improve equitable access.</p> <p><u>Will the option allow access to water infrastructure? (SR7/1)</u></p> <p><u>Will the option allow access to sewerage infrastructure/ (SR7/1)</u></p> <p><u>Will the option allow access to electricity supplies? (SR3/4)</u></p> <p><u>Will the option allow access to gas supplies?</u></p> <p>Also see SA objective 3 (a &amp; b)</p>
7	To make the best use of previously developed land and existing buildings.	Will the option deliver new development on previously developed land?
8	To reduce land contamination and safeguard soil quality and quantity.	See SA Objective 7
9	To ensure air quality continues to improve.	<p>Will the option help improve air quality?</p> <p>Will the option support specific</p>

		actions in designated AQMAs? Will the option minimise exposure to air pollution?
10	To reduce noise pollution.	Will the option help lessen noise pollution? Will the option minimise exposure to noise pollution?
11	To reduce light pollution.	<del>a.</del> —Will the option help lessen an increase in light pollution?
12	To maintain and improve the water quality of the region's rivers and groundwater.	No significant issues identified.
13	To conserve and enhance biodiversity within the plan area.	<del>a.</del> —Will the option secure enhancement in biodiversity in all new development? <del>b.</del> —Will the option continue to protect formally designated areas of nature conservation? Will the option create more habitats? Will the option prevent fragmentation, and increase connectivity, of habitats? Will the option enhance urban biodiversity? <u>Will the option enhance rural biodiversity? (SR8/9)</u> Will the option take account of the effects of climate change on biodiversity? Will the option secure enhancement in biodiversity in all new development?
14	To protect, enhance the natural, archaeological, historic environments	Will the option avoid adverse impacts on important landscapes?

	and cultural assets.	<p>Will the option enhance the local character?</p> <p>Will the option continue to protect and/or enhance the Borough's cultural assets?</p> <p>Will the option improve equitable access to the Borough's cultural assets?</p>
15	To reduce road congestion and the need to travel.	<p>Will the option reduce the need to travel?</p> <p>Will the option improve access by walking/cycling?</p> <p>Will the option improve access by public transport?</p> <p>Will the option reduce the need for road freight?</p> <p>Will the option encourage mixed-use development?</p>
16	To reduce greenhouse gases.	<p>Will the option reduce the quantity of greenhouse gases released into the atmosphere?</p>
17	To ensure the Borough is prepared for the impacts of climate change.	<p>a. Will the option help in protecting the community from the extremes of climate change?</p> <p>Will the option increase the ability of the community to become more self sufficient, so as to withstand major weather events?</p> <p>Will the option reduce the opportunity to adapt in the future?</p> <p>Will the option reduce the risk of flooding to the development?</p> <p>e. Will the option reduce the risk of flooding to adjacent development and others downstream?</p>

18	To provide for employment opportunities.	<p>Will the option encourage jobs accessible to local residents?</p> <p>Will the option help maintain the supply of labour?</p> <p>Will the option encourage the provision of, and access to, lifelong learning?</p>
19	To make land available to meet the needs of the economy.	<p>Will the option provide for the needs of the local economy?</p> <p>Will the option encourage rural diversification?</p>
20	To support economic growth which is inclusive, innovative and sustainable.	<p>Will the option enhance the viability of urban centres?</p> <p>Will the option enhance the vitality and attractiveness to urban centres?</p>
21	To achieve sustainable production and use of resources.	<p>a. Will the option encourage sustainable construction?</p> <p>b. Will the option lessen the use of resources, either by reduction, or re-use?</p> <p>c. Will the option help stabilise the Borough's ecological footprint?</p> <p><a href="#">Will the option encourage water efficiency? (SR9/4)</a></p>
22	To increase energy efficiency in new and existing development.	<p>Will the option improve energy efficiency?</p> <p>Will the option support de-centralised energy generation?</p> <p>Will the option support the development of CHP?</p>
23	To increase the production and use of renewable energy.	<p>Will the option facilitate the generation/use of renewable energy?</p>

## APPENDIX I

### Plans and Programs Influencing the Local Development Framework

The LDF has not been prepared in a vacuum. The policies and plans that it is to contain will be developed taking into account Government guidance, the Structure Plan, and other relevant regional, county and local strategies, as well as reflecting local needs and requirements, for example those which have been identified through the Community Plan.

Listed below are the plans, programmes and strategies that have been considered to influence the formation of the sustainability objectives and consequently have a bearing on the formation of LDF policies. Reviews have been carried out for guidance at the international, national, regional, county and local level to identify relevant sustainability objectives, targets and any specific requirements.

<b>INTERNATIONAL</b>
The Johannesburg Declaration on Sustainable Development
European Spatial Development Perspective (97/150/EC)
European Habitats Directive (Special Areas of Conservation (SACs)) (92/43/EEC)
European Birds Directive (79/409/EEC)
European Nitrates Directive
European Air Quality Directive
European Water Framework Directive (2000/60/EC)
European Waste Framework Directive
European Environmental Impact Assessment Directive (97/11/EC)
European Strategic Environmental Assessment Directive (2001/42/EC)
European Energy Performance of Buildings Directive (2002/91/EC)
European Noise Directive (2001/14/EC)
Aarhus Convention 1998 (UN Economic Commission for Europe (UNECE) Convention on Access to Information, Public Participation in Decision- Making and

Access to Justice in Environmental Matters
European Union Sixth Environmental Action Plan (2001)
Kyoto Protocol on Climate Change
United Nations Convention on Human Rights
Valetta Convention (the European Convention on the protection of Archaeological heritage) (2001)

<b>NATIONAL</b>
<a href="#">ODPM Circular 06/2005: Biodiversity and Geological Conservation</a>
<a href="#">Natural Environment &amp; Rural Communities Act 2006</a>
<a href="#">Countryside &amp; Rights of Way Act 2000</a>
<a href="#">Wildlife &amp; Countryside Act 1981</a>
<a href="#">Conservation Regulations 1994</a>
Securing the Future - delivering UK Sustainable Development Strategy (2005)
Sustainable Communities Plan
Urban White Paper
Rural White Paper (2000)
UK Biodiversity Action Plan (1994)
Energy White Paper
National Air Quality Strategy
White Paper on The Future of Transport: a network for 2030 (July 2004)
UK Climate Change Programme
Water Act 2003
Planning Policy Statement 1: Delivering Sustainable Development (2005)
PPS3 3: Housing
<a href="#">PPS4: Planning for Sustainable Economic Growth Revision 2009/10 (SR2/3)</a>

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Planning Policy Statement 6: Planning for Town Centres (March 2005)
Planning Policy Statement 7: Sustainable Development in Rural Areas (2004)
Planning Policy Statement 9: Biodiversity and Geological Conservation (2005)
Planning Policy Statement 10: Planning and Sustainable Waste Management (2005)
PPS11: Regional Spatial Strategies
PPS12: Local Spatial Planning (2008)
Planning Policy Guidance 13: Transport (2001)
Planning Policy Guidance 14: Development on Unstable Land
Planning Policy Guidance 15: Planning and the Historic Environment (1994)
Planning Policy Guidance 16: Archaeology and Planning (1990)
Planning Policy Guidance 17: Planning for Open Space, Sport and Recreation (2003), and Companion Guide: Assessing Needs and Opportunities
Planning Policy Guidance 18: Enforcing Planning Control (1991)
Planning Policy Guidance 19: Outdoor Advertisement Control (1992)
Planning Policy Guidance 21: Tourism (1992)
Planning Policy Statement 22: Renewable Energy (2004) and Companion Guide
Planning Policy Statement 23: Planning and Pollution Control (2004)
Planning Policy 24: Planning and Noise (1994)
Planning Policy <del>Guidance</del> <sup>Statement</sup> 25: Development and Flood Risk (2006)
Circular 1/94 - Gypsy Sites and Planning (new draft circular November 2004)
Circular 22/91 - Travelling Show People
Circular 5/05 - Planning Obligations
ABI The Vulnerability of UK Property to Windstorm Damage (2003)

<b>REGIONAL</b>
South East Plan
Regional Transport Strategy (2004)

Regional Housing Strategy (2005)
Regional Economic Strategy (2002)
South East Regional Economic Strategy
Regional Strategy for Energy Efficiency and Renewable Energy 2004
Integrated Regional Framework (2004)
<a href="#">Catchment Flood Management Plan (SR9/2)</a>
<a href="#">SE Biodiversity Strategy</a>

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<b>COUNTY</b>
Surrey 2020 - Community Strategy for Surrey
Surrey Hills Area of Outstanding <a href="#">Natural</a> Beauty Management Plan <a href="#">2009-2016</a>
Surrey Biodiversity Action Plan
Surrey Cultural Strategy
Surrey Economic Partnership (SEP) Economic Strategy
Surrey Heritage Strategy
Surrey's Second Local Transport Plan 2006/7 -2010/11
Surrey Minerals Local Plan
Surrey Rural Strategy
Surrey Sports Strategy
Surrey Waste Local Plan
Parking Strategy for Surrey (2003)
Surrey Design Guide
Surrey Infrastructure Guide
<a href="#">Surrey Ancient Woodland Survey</a>

<b>LOCAL</b>
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Reigate & Banstead Borough Local Plan 2005
Reigate & Banstead Community Plan 2003 (due to be reviewed)
Housing Strategy 2003-06
Community Safety Plan April 2008 - March 2011
Local Air Quality Review and Assessment
Heritage Strategy 1996
Countryside Strategy 1999
Homelessness Strategy 2003-08 and Review 2002
PPG17 Study

#### **Conflicting Plans affecting the LDF**

The need for housing to be accommodated as far as possible on previously developed land is an example of a potential source of conflict. The development of all previously developed land for housing, increasingly at higher densities, has the potential to dramatically alter the character of the area and may result in the loss of employment land.

**Appendix 2: Summary of significant issues compared with the list of subjects in the SEA Regulations Schedule II**

Subject listed in Schedule II of the SEA Regulations	Where considered in the Scoping Report
Biodiversity	Biodiversity, page 31.  Key issues: impact on habitats, green infrastructure, urban biodiversity.
Population	Housing, page 17, and Sustainable Communities section, page 20.  Key issues: meeting housing allocation, affordable housing, extra care housing, and access to employment opportunities.
Human health	Sustainable Communities, page 20, Accessibility, page 23, and Health and Well Being, page 26  Key issues: as population, air quality, access to services and open space
Fauna	See Biodiversity
Flora	
Soil	No significant issues identified
Water	Climate Change, page 33  Key issues: water consumption, flooding
Air	Sustainable Communities, page 20, Accessibility, page 23, and Health and Well Being, page 26  Key issues: congestion, access to services, energy use and air quality.
Climatic factors	Climate Change, page 33  Key issues: water consumption, flooding, and energy consumption.
Material assets	Sustainable Communities, page 20, and Climate Change, page 33  Key issue: local distinctiveness, efficient resources use

	(energy, water)
Cultural heritage, including architectural and archaeological heritage	Housing, page 17, and Sustainable Communities, page 20. Key issue: local distinctiveness.
Landscape	Housing, page 17, and Sustainable Communities, page 20. Key issue: local distinctiveness, development in the countryside.