Habitats Regulations Assessment

Appropriate Assessment Stage

of Reigate & Banstead Borough Council’s

Core Strategy

February 2012
Local Development Framework

Habitats Regulations Assessment of Reigate & Banstead Borough Council’s Core Strategy

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EXECUTIVE SUMMARY

Reigate & Banstead Borough Council is currently preparing a Local Development Framework (LDF) which will set out new planning policies for the borough. Within the LDF, the Core Strategy will set the overall strategic policy. Other documents being prepared as part of the LDF include the Redhill Town Centre Area Action Plan (RTCAAP), the Development Management Policies (DMP) Development Plan Document, and a number of Supplementary Planning Documents (SPDs). These other documents will reflect the strategic direction provided by the Core Strategy, and are being progressed closely behind the Core Strategy to provide maximum certainty to local communities, service providers and developers.

The European Directive (92/43/EEC) on the Conservation of Natural Habitats and Wild Flora and Fauna (the ‘Habitats Directive’) sets out the means to protect habitats and species of European importance through the establishment and conservation of a network of sites known as ‘Natura 2000’ sites. Habitats Regulations Assessment (HRA) is required of land use plans under this Directive, as transposed into UK Law by the Conservation of Habitats and Species Regulations (the Habitats Regulations) 2010. The purpose of the HRA is to assess the implications of a plan, either individually, or in combination with other plans or projects, on these Natura 2000 Sites. In normal circumstances, a land use plan can be brought into effect only after having ascertained that it will not adversely affect the integrity of a Natura 2000 site. This may well mean taking measures to avoid adverse impacts, including finding alternative options, as part of the plan-making process.

This report is the Appropriate Assessment (AA) stage of the HRA of the Local Development Framework’s Core Strategy for the borough of Reigate & Banstead for the Plan period 2012 to 2027. It updates the AA reports of November 2008 and August 2009 which accompanied earlier versions of the Core Strategy.

Developing the Core Strategy and the Appropriate Assessment is an iterative process. At each stage of the process, Reigate & Banstead Borough Council has taken on board the comments received from Natural England.

One Natura 2000 site lies within the Reigate & Banstead boundary – the Mole Gap to Reigate Escarpment Special Area of Conservation (SAC). In addition, Ashdown Forest SAC and Special Protection Area (SPA) lie within a 15 km distance of the borough boundary. As a result of a screening study, the key potential impacts of the Core Strategy on these Natura 2000 sites were identified as being:

- Potential impacts on habitat due to increased recreational use and the maintenance (and cessation of grazing);
- Potential disturbance to roosting populations of the Bechstein Bat, a European Protected Species; and
- Potential impacts on habitats as a result of increased air pollution.
These potential impacts of the Core Strategy were examined in the AA of November 2008, and measures were identified to avoid impacts. As a result of the AA, it was concluded that the Core Strategy alone, and in combination with other plans and projects, would have no adverse impact on the integrity of the Natura 2000 Sites as protected by the European Habitats Directive. In summary:

- Recreational pressure created by the proposals contained within the Core Strategy and in combination with other current Plans will be minimal. It is considered that no significant adverse impact will result on the integrity of the SACs.
- Additional air pollution created by the proposals contained in the Core Strategy will be minimal. It is therefore considered that the Core Strategy will not have an adverse impact on the integrity of the Mole Gap to Reigate Escarpment SAC. It is considered that the Core Strategy will not have adverse impacts on the Ashdown Forest SAC/SPA because of the distance involved and with the proposed avoidance measures.
- Through policies contained within the Core Strategy on Infrastructure Provision, biodiversity, design and landscaping, development should result in a net gain in biodiversity value and not result in harm to bats or other species.
- Climate change is considered to be a global issue. The policies in the Core Strategy will result in a reduction in the growth in greenhouse gases, but this in itself will not have a significant impact on the environment. Only in combination with the efforts of others will a change be seen.
- The effects of urbanisation are difficult to control directly through the Core Strategy but may be controlled, to some extent, through the policies designed to avoid the impacts associated with recreational use of the site.

These potential impacts have been examined again, for the Core Strategy (March 2012). Reigate & Banstead Borough Council considers that the changes within the revised Core Strategy do not alter the conclusions reached in the earlier HRA. Natural England in their letter of 15 February 2012, referring to the draft of this AA report, is satisfied that the revised Core Strategy ‘does not present any significant change in potential impacts …. on European sites compared to the earlier versions of the Core Strategy and HRA.’ Natural England therefore maintains its ‘concurrence with the conclusions made in the revised AA of no likely significant effects of the Core Strategy on European sites.’

The ongoing monitoring of the Core Strategy will play a part in ensuring that the avoidance measures proposed through the Appropriate Assessment are effective.
Habitats Regulations Assessment of Reigate & Banstead Borough Council’s Core Strategy

1 BACKGROUND

1.1 Introduction

1.1.1 Reigate & Banstead Borough Council is currently preparing a Local Development Framework (LDF) which will set out new planning policies for the borough. The LDF will take the form of a suite of Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs) which together will replace the borough’s Local Plan of 2005. Within the LDF, the Core Strategy will set the overall strategic policy for the borough. Other documents being prepared as part of the LDF include the Redhill Town Centre Area Action Plan (RTCAAP), the Development Management Policies (DMP) DPD and a number of Supplementary Planning Documents (SPD). These will reflect the strategic direction provided by this Core Strategy, and are being progressed closely behind the Core Strategy to provide maximum certainty to local communities, service providers and developers.

1.1.2 The European Directive (92/43/EEC) on the Conservation of Natural Habitats and Wild Flora and Fauna (the ‘Habitats Directive’) sets out the means to protect habitats and species of European importance through the establishment and conservation of a network of sites known as ‘Natura 2000’ sites. These are sites of exceptional importance in respect of rare, endangered or vulnerable natural habitats and species within the European Community. Habitats Regulations Assessment (HRA) is required of land use plans under the Habitats Directive, as transposed into UK law by the Conservation of Habitats and Species Regulations 2010 (The Habitats Regulations 2010). The Conservation of Habitats and Species Regulations (Habitats Regulations) 2010 updates the Conservation (Natural Habitats etc) Regulations 1994 (as amended).

1.1.3 Section 61 of the 2010 Regulations requires the following (in part):

<table>
<thead>
<tr>
<th>Section 61 of the Habitats Regulations 2010 (in part)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which:</td>
</tr>
<tr>
<td>(a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and</td>
</tr>
<tr>
<td>(b) is not directly connected with or necessary to the management of that site,</td>
</tr>
<tr>
<td>must make an appropriate assessment of the implications for that site in view of that site’s conservation objectives.</td>
</tr>
</tbody>
</table>

5. In the light of the conclusions of the assessment, and subject to regulation 62 (considerations of...
overriding public interest), the competent authority may agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site or the European offshore marine site (as the case may be).

It is confirmed that this plan is not directly connected with the management of a Natura 2000 site, it does not introduce any management measures for conservation purposes, and therefore fits within the scope of plans which should be subject to the HRA process.

1.1.4 The purpose of the HRA is to assess the implications of a plan, either individually, or in combination with other plans or projects, on these Natura 2000 Sites. The Habitats Directive applies the precautionary principle to Natura 2000 sites. In normal circumstances, a land use plan can be brought into effect only after having ascertained that it will not adversely affect the integrity of a Natura 2000 site. This may well mean taking measures to avoid adverse impacts, including finding alternative options, as part of the plan-making process.

1.1.5 The HRA assessment has been undertaken in stages and as an iterative process in parallel with the emerging Core Strategy. Prior to submitting the Core Strategy in March 2009, the Council had carried out earlier stages of HRA assessment (see Section 2.4) which determined that an Appropriate Assessment (AA) was required. The Council submitted the Core Strategy in March 2009 accompanied by an AA Report (dated November 2008). In February 2010, the Council submitted ‘Suggested Amendments proposed for the Inspector,’ accompanied by an AA Report (August 2009). Subsequently this Core Strategy was withdrawn for reasons provided in Section 2.2.8.

1.1.6 A revised Core Strategy (the Core Strategy) is now being prepared (March 2012). The key differences, of relevance to the HRA, are outlined in Section 1.3.2. This document reports on an AA of the Core Strategy dated March 2012. It updates the AA report of August 2009.

1.2 Methodology

1.2.1 European guidance on HRA recommends a process of up to four stages:

Stage 1 Screening Stage - Determining whether the plan in itself or ‘in combination’ with others is likely to have a significant effect on a European site. If the answer is ‘yes’ then the adverse effects on the integrity of each European site must be considered via ‘Appropriate Assessment’ at Stage 2 below.

Stage 2 Appropriate Assessment - Determining whether, in view of the site’s conservation objectives, the plan in itself or ‘in combination’ would have an adverse effect (or risk of

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2 Revised Appropriate Assessment of the Core Strategy for Reigate & Banstead Incorporating the Assessment of the Council’s Suggested Modifications (to The Planning Inspector) to the Core Strategy (August 2009)
Stage 3 Assessment of alternative solutions - Where it is assessed that there may be an adverse impact (or risk of this) on the integrity of the site, there should be an examination of the alternatives.

Stage 4 Assessment where no alternative solutions remain and where adverse impacts remain.

1.2.2 The plan-making authority (the Council) is required to consult the appropriate nature conservation body (Natural England) in carrying out an HRA Assessment, as well as the general public and/or stakeholders as appropriate.

1.2.3 Broadly the HRA assessment involves the following processes:

- Early discussions with Natural England to confirm that the proposed approach to the assessment is acceptable, and whether additional information will be needed to complete the analysis.
- Identification of European sites that could be affected by the Core Strategy, qualifying features of those sites, and key environmental conditions to support the sites’ integrity.
- Draft identification of impacts, sites that could be screened out, and those that were likely to require more detailed assessment. (Stage 1: screening stage)
- Identification of possible impacts on the sites arising from the Core Strategy (Stage 2a: AA scoping stage including site by site assessment).
- Collection of more detailed data if necessary.
- Conclusions about the likely ‘in combination’ impacts of the Core Strategy on the European sites identified, and conclusions about the measures needed to avoid these impacts including an AA of each policy (AA stage 2b).
- Preparation of a draft AA report, and formal consultation with Natural England and other consultees recommended by Natural England.
- Preparation of a final AA report, following formal consultation with Natural England, and other consultees recommended by Natural England.

1.3 The Purpose and Structure of this Report

1.3.1 This report presents the findings of the AA of the Core Strategy (March 2012) for the borough of Reigate & Banstead for the period 2012-27. It updates the AAs of November 2008 and August 2009 which accompanied the earlier Core Strategy and the Council’s ‘Suggested Amendments proposed for the Inspector.’ The Core Strategy was withdrawn in March 2010 to enable further work to be carried out in relation to a number of specific topic areas, including housing land supply and infrastructure provision.
1.3.2 This AA includes the assessment of the changes to the Core Strategy since the document of February 2010. The changes are outlined in Section 3.8; those of relevance to the AA are as follows:

- **Revised housing numbers.** 6900 housing units are now proposed over the plan period, 460 per year. This is a reduction from the 10,000 homes assessed in the AA of August 2009.

- **Clarification on sustainable urban extensions.** In the Core Strategy of March 2009 and in the report of 2010 entitled ‘Suggested Amendments proposed for the Inspector,’ the Council planned the housing to be within the urban areas identified in the report. Additionally, the earlier Core Strategy indicated that towards the end of the Plan period, from 2016, there may be the need for urban extensions. Further clarification is now provided. It is now considered that there will be a need for one or more sustainable urban extensions beyond 2021, in order to meet the housing demand. This may necessitate release of some greenfield land. The location of potential sustainable urban extensions will be informed by specific criteria, one of which will be that potential sites will be ‘not within the proximity of the Mole Gap to Reigate Escarpment, so as to avoid any urbanising and recreational impact on the SAC, and not covered by environmental or landscape designations such as SSSI or AONB (see section 2.2.11).

- **Update on employment and retail provision.** Updated retail figures are provided, and the policy on employment is strengthened. There is no change in spatial distribution.

- **Removal of the buffer around the SAC.** The buffer, which had been included in the earlier Core Strategy, is no longer included for reasons outlined in Section 3.2.19, and as agreed with Natural England. This has been replaced by a statement on the requirement for HRA assessment, and by further clarification over, and policy support for, the role of the GI Strategy in delivering the avoidance measures to avoid potential adverse effects on the SAC.

- **Community Infrastructure Levy.** Further clarification is provided on policy regarding the Community Infrastructure Levy.
1.3.3 Natural England had agreed with the approach and conclusions of the AA of August 2009 supporting the ‘Suggested Amendments proposed for the Inspector’ dated February 2010, (July 2009, Appendix 2).

1.3.4 Section 2.4.1 describes how the HRA was undertaken in parallel with the Core Strategy development. Section 2 covers the Stage 1 ‘Screening’ stage of the study and Section 3 provides an updated ‘Stage 2’ Appropriate Assessment and assessment of the ‘in-combination’ effects of this and other plans on those key features of a Natura 2000 site most at risk from significant change. A revised ‘Policy by Policy’ Appropriate Assessment is also included.

1.3.5 The HRA for the Core Strategy was developed in co-operation with Mole Valley District Council (MVDC) and Tandridge District Council (TDC) and has taken on board the comments received from Natural England to each Authority at each stage in the work. Following the initial Stage 1 screening process, Tandridge District Council was able to rule out any adverse impact of their Core Strategy on any Natura 2000 sites, however work continued with MVDC as the Councils prepared AA reports for their original Core Strategies, to ensure that the cross boundary issues, ‘in-combination’ effects were taken on board and expertise were shared. MVDC and RBBC will continue to work together as partners within the Surrey Hills AONB Management Board to address potential adverse effects on the SAC.
2 STAGE 1: SCREENING

2.1 Identification of Natura 2000 Sites

2.1.1 The screening process aims to identify Natura 2000 sites that could be adversely affected by proposals within the Core Strategy. This section therefore identifies Natura 2000 sites that fall within the Authorities boundaries and those that are within 15km of the borough’s boundaries (the distance recommended by Natural England). The extent of this area of search reflects the likely ‘reach’ of any impacts arising from the Core Strategy, including resource requirements, air pollution, the existing pressure on sites and recreational impacts. This is not an exact science and any wider impacts identified would also have to be considered. This section then summarises the key conservation objectives of the sites and the possible impacts of the Core Strategy, lists existing trends that could affect the sites ‘in combination’ with the Core Strategy and other significant plans in the surrounding area, and identifies sites that could be screened out, as they are unlikely to be affected by the Core Strategy.

2.1.2 Table 2.1 lists all the identified Natura 2000 sites. These are also shown on the map, Figure 2.1. Only the Mole Gap to Reigate Escarpment SAC is within the borough.
<table>
<thead>
<tr>
<th>NAME OF SITE</th>
<th>SITE DESIGNATION STATUS</th>
<th>LOCAL AUTHORITY AREA</th>
<th>APPROX. DIST. FROM RBBC BOUNDARY (KM)</th>
<th>REASON FOR DESIGNATION/ KEY CHARACTERISTICS.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mole Gap to Reigate Escarpment</td>
<td>SAC</td>
<td>RBBC &amp; MVDC</td>
<td>0 (within boundary)</td>
<td>The SAC is 888ha in area, of which 60% is broad-leaved deciduous woodland, 25% is dry grassland and 15% is heath/scrub. Most of this site is a mosaic of chalk downland habitats, ranging from open chalk grassland to scrub and broadleaved semi-natural woodland on the scarp slope of the North Downs. The Mole Gap is the only known outstanding locality in the United Kingdom of stable communities of Box woodland <em>Buxus sempervirens</em> on rock slopes (the total extent of this community in the United Kingdom is estimated to be less than 100 hectares). This occurs on steep chalk slopes where the river Mole has cut into the North Downs Escarpment. The site is considered to be one of the best areas in the United Kingdom for chalk grassland <em>Festuco-Brometalia</em>, important orchid sites and Yew <em>Taxus baccata</em> woodland. The site is also considered to support a significant presence of European dry heaths, beech forests <em>Asperulo-Fagetum</em>; Great Crested Newt <em>Triturus cristatus</em>; Bechstein's bat <em>Myotis bechsteini</em>.</td>
</tr>
<tr>
<td>Ashdown Forest</td>
<td>SAC &amp; SPA</td>
<td>Wealden DC</td>
<td>12.5</td>
<td>Ashdown Forest is one of the most extensive areas of wet and dry heathland in south-east England. It also has a significant presence of Great Crested Newts. During the breeding season the area regularly supports 1% of the GB breeding population of Nightjar <em>Caprimulgus europaeus</em>; 1.3% of the GB breeding population of Dartford Warbler <em>Sylvia undata</em>.</td>
</tr>
<tr>
<td>Thames Basin Heaths</td>
<td>SPA</td>
<td>Elmbridge &amp; Guildford</td>
<td>11.8</td>
<td>Internationally important lowland heathland formed by a mosaic of habitats. During the breeding season the area regularly supports 7.8% of the GB breeding population of Nightjar <em>Caprimulgus europaeus</em>; 9.9% of the GB breeding population of Woodlark <em>Lullula arborea</em>; and 27.8% of the GB breeding population of Dartford Warbler <em>Sylvia undata</em>.</td>
</tr>
<tr>
<td>NAME OF SITE</td>
<td>SITE DESIGNATION STATUS</td>
<td>LOCAL AUTHORITY AREA</td>
<td>APPROX. DIST. FROM RBBC BOUNDARY (KM)</td>
<td>REASON FOR DESIGNATION/ KEY CHARACTERISTICS</td>
</tr>
<tr>
<td>--------------------------------</td>
<td>-------------------------</td>
<td>------------------------------------------------</td>
<td>--------------------------------------</td>
<td>-------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>South West London Water bodies</td>
<td>SPA &amp; Ramsar Site</td>
<td>Elmbridge</td>
<td>13.3</td>
<td>A series of reservoirs and former gravel pits that support internationally important populations of Shoveler Duck <em>Anas clypeata</em> (2.1% of the population of North-western/Central Europe); and Gadwall Duck <em>Anas strepera</em> (2.4% of the population of North-western Europe). As a Ramsar Site it also supports nationally important populations of Black-necked grebe <em>Podiceps nigrigollis nigrigollis</em> and Smew <em>Mergellus albellus</em> during the winter and nationally important populations of Great crested grebe <em>Podiceps cristatus cristatus</em>, Great cormorant <em>Phalacrocorax carbo carbo</em> and Tufted duck <em>Aythya fuligula</em> during the spring/ autumn.</td>
</tr>
<tr>
<td>Richmond Park</td>
<td>SAC</td>
<td>Merton, Wandsworth, Richmond-upon-Thames</td>
<td>9.4</td>
<td>Richmond Park has a large number of ancient trees with decaying timber. It is at the heart of the south London centre of distribution for the European stag beetle <em>Lucanus cervus</em>.</td>
</tr>
<tr>
<td>Wimbledon Common</td>
<td>SAC</td>
<td>Merton, Wandsworth, Richmond-upon-Thames</td>
<td>9.4</td>
<td>The site is one of only four known outstanding localities in the United Kingdom for European stag beetle <em>Lucanus cervus</em>. The area is considered to support a significant presence for European dry heaths and Northern Atlantic wet heaths with cross-leaved heath <em>Erica tetralix</em>.</td>
</tr>
</tbody>
</table>
Figure 2.1 Natura 2000 Sites within 15 Kms of Reigate & Banstead Borough Council
2.2 Existing Trends and Future Development Plans

2.2.1 The Reigate & Banstead Local Development Framework Core Strategy sets the overarching strategic policies for the borough up until 2027. More detailed policies, stemming from the strategy, will be established in subsequent Development Plan Documents.

2.2.2 The Vision of the Core Strategy is:

Reigate & Banstead will be one of the most desirable and attractive areas in the region. It will be a place where:

- People who live in, work in, and visit the borough enjoy the benefits of a prosperous economy;
- Neighbourhoods are renewed, improved and supported by effective service, infrastructure and transport options;
- The wellbeing of communities is supported by accessible health, leisure, education and information services;
- People take personal responsibility, enjoy active, healthy and diverse lifestyles;
- The environment and green space is maintained and enhanced for the future.

2.2.3 This Vision is then expanded on within the Core Strategy in order for the Spatial Strategy, objectives and preferred policies to be established.

2.2.4 A detailed assessment of the individual policy approaches is set out later in the report but of particular significance to the AA are the following proposed policy approaches:

- Housing Infrastructure Provision
- Employment and Retail Development

Housing Provision

2.2.5 To meet the land use needs of the borough to 2027 the Council must allocate land for specific uses. Some major development areas have already been allocated through the Structure Plan or Local Plan processes (i.e. Horley New Neighbourhoods). There is a council commitment to progress regeneration initiatives in the priority areas of Merstham, Redhill, Preston and Horley. However, to deliver our housing target, projected employment demands and retail needs, the Council will identify, assess and allocate appropriate sites for future development.
2.2.6 This approach will ensure that allocated sites for development are consistent with the Council’s spatial strategy by promoting sustainable forms of, and sustainable locations for, new development. The Council has produced a range of evidence to support this Core Strategy, including a Strategic Housing Land Availability Assessment, an Employment Land Review and Sites Assessment and a Retail Capacity study.

2.2.7 In confirming detailed allocations, sites will be scrutinised against policies contained within this Core Strategy as well as against the rigours of Sustainability Appraisal, before appropriate choices are made about allocation of land.

2.2.8 In the early stage of developing the Core Strategy, the borough had planned for the number of housing units set out in the draft South East Plan that recommended 7,250 units over the Plan period. At a later stage, the borough revised this to the indicative number of houses provided in the Panel Report to the Examination in Public of the Draft South East Plan (2007)\(^3\), of 9,240 dwellings for the Plan period. At the time of preparing the Core Strategy (March 2009), the Council determined that, until such time as there was certainty over the housing figures that would apply to the borough, it should plan for the delivery of the highest figure it had tested to date, i.e. 9,240 units. A further increase in housing allocation was proposed in the later submission, ‘Amendments proposed for the Inspector,’ February 2010. The document proposed 10,000 units, with a ‘notional higher unit scenario’ of 12,500 units. These figures were assessed in the AA of August 2009 which accompanied the ‘Suggested Amendments proposed for the Inspector’ (February 2010). Following examination in public, the Core Strategy was withdrawn in April 2010 to enable further work to be carried out in relation to a number of specific topics areas, including housing land supply and infrastructure provision.

2.2.9 The number of houses now proposed in the Core Strategy is 6,900, or 460 per year over the Plan Period. It is this pattern of housing supply which is now assessed in this AA. In allocating land for future development the Council will look sequentially across the borough. In years 1-10 these will be provided by delivering the Council’s regeneration aspirations, delivery of the Horley new neighbourhoods and making the best use of previously developed land in the urban areas. The other town centres also offer opportunities for sustainably located development, and many other urban locations are highly accessible and well suited for future development. Smaller scale development may also be appropriate in other urban areas. Beyond 2022, development opportunities

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\(^3\) Draft South East Plan 2006
within the urban area may become more limited. At this stage, if insufficient sites come forward in the urban areas, then some sustainable urban extensions may be required which may require the release of greenfield sites. However this will only be considered in the most sustainable locations, in the latter part of the plan period when regeneration opportunities and the Horley new neighbourhoods have been delivered, and if other development opportunities within the urban area are exhausted. Monitoring targets and triggers will ensure that land will only be released for sustainable urban extensions in these circumstances.

2.2.10 Overall the Core Strategy directs new housing to previously developed land, thereby preventing the loss of open space and safeguarding the Green Belt. The majority of new homes in the borough will be located in Redhill town centre and in two planned new neighbourhoods in Horley. It is planned to reduce congestion through a number of measures in conjunction with the developments and to assist in the modal shift from car to more sustainable forms of transport. This comprehensive approach to new development in Horley has been planned around the aim of achieving a 20% reduction in normal peak hour traffic movements from the new housing development.

Sustainable Urban Extensions

2.2.11 Approximately 70% of the borough, and most of its ‘green fabric’ is covered by Green Belt designation. National policy requires that the Green Belt be protected, however, also that from time to time it should be reviewed as required. The identification of potential locations for sustainable urban extensions will be informed by the following search criteria:

- Fit with our overall spatial strategy and the criteria for sustainable development set out in CS8;
- Those areas of land that have a realistic chance of being developed, and which are not within proximity of the Mole Gap to Reigate Escarpment (to avoid any urbanising impact on the SAC), and not covered by environmental or landscape constraints such as SSSI or AONB;
- Those areas which adjoin the urban area and are accessible to existing public transport/service provision;
- Those areas of land which do not make a significant contribution to fulfilling Green Belt functions.

2.2.12 For the 6,900 units now proposed within the Core Strategy, the distribution will be as follows for the first ten years of the plan:
Regional Planning Area – London Fringe
- Area 1 (Banstead Area) – 1,845 dwellings, incorporating new housing development in the areas of Preston and small sites in the urban areas
- Area 2a (Redhill) – 1,239 dwellings to be developed in Redhill Town Centre and Merstham, as well as developments in Holmetherpe
- Area 2b (Reigate and the rest of Area 2) – 253 dwellings from small sites in the urban area

Regional Planning Area – Gatwick Area
- Area 3 (Horley Area) – 2,382 dwellings. Two new neighbourhoods with additional town centre development and other small sites in the urban area

These areas are illustrated in the Map 5 of the Core Strategy.

2.2.13 The Core Strategy sets out the overall strategy for future development and strategic locations. The Development Management Policies (DMP) will identify and allocate sufficient land to ensure that there is a supply of deliverable sites in years 1-5 and developable sites within years 6-10. Sites will also be identified and allocated as necessary for development within years 11 to 15.

Employment and Retail Development

2.2.14 It is proposed that the Core Strategy will seek to retain the existing stock of employment land and accommodate additional employment floorspace in the borough’s town centres and industrial estates, and in particular resist development outside of the urban area.

2.2.15 The Core Strategy and Redhill Town Centre Area Action Plan (RTCAAP) aim to increase the comparison floor space by 25,800sqm and the convenience floorspace by 11,700sqm by 2027. The majority of this will be in Redhill Town Centre. In other town and local centres, more limited growth will ensure these centres retain a constant market share of both comparison and convenience floorspace.

2.2.16 The borough’s proximity to Gatwick Airport results in good national and international transport links but it also brings with it problems such as traffic congestion and noise and air pollution, that need to be managed.

2.3 ‘In-Combination’ Effects of Other Plans

2.3.1 The Mole Gap to Reigate Escarpment SAC runs through both Reigate & Banstead Borough and Mole Valley District. It was therefore felt that a more detailed examination of Mole Valley District Council’s proposals was needed.
2.3.2 The Mole Valley Core Strategy provides for the following:

- At least 3,760 new homes (average of 188 homes per year) are to be built in the District in the period to 2026. The Core Strategy directs these to previously developed land within built-up areas in the most sustainable locations of Dorking, Leatherhead and then Ashtead, Fetcham and Bookham. Provision will also be made for rural affordable housing on small sites within or well related to villages, where needed. At least 580 homes already have already been constructed.

- The Core Strategy seeks to consolidate the town centre roles of Dorking, Leatherhead, Ashtead, Fetcham and Bookham and resist any further loss of shops within the rural villages. There is a need to sustain the vitality and viability of these centres over the next 20 years.

- No specific employment floor space requirements are set out in the Core Strategy, the policy approach is to safeguard the most suitably located employment sites; intensify use of sites in some locations and support development that meets the varying requirements of Dorking and Leatherhead’s economy. The Core Strategy also seeks to support work to reduce the disparity between the skills of residents and the jobs available, support rural diversification, make provision for visitor accommodation and support the establishment of new companies, particularly in the field of sustainable development.

- The Strategy seeks to ensure that development takes place where there are options in terms of access to public transport or arrangements to reduce travel by car. There are currently no proposals for large-scale road or rail infrastructure projects, but it is important to recognise that the M25 runs east-west through the District and that Gatwick and Heathrow flight paths also impact on both the northern and southern extents of the District. In addition Gatwick Airport abuts the District to the south-east.

- The other main elements of the Core Strategy seek to safeguard and where necessary enhance the attractive natural landscape and built environment, it also seeks to ensure that natural resources are used wisely e.g. through the promotion of energy and water efficiency measures and the minimisation of waste; and, that the risk of flooding, environmental pollution etc is also minimised. Finally it seeks to ensure that there is provision of open space, sports and recreation facilities and adequate services and community facilities to meet existing and future requirements.

2.3.3 It is considered that the main ‘in combination’ impacts of the Mole Valley and Reigate & Banstead Core Strategies on European sites are likely to be in the form of:
• Intensification of uses through increased development and the re-use of previously developed land for residential and employment uses. General urbanisation can also lead to more activity, noise, light etc, could potentially put a strain on European Sites and facilities and must be managed.
• Development within urban areas. Note: development on the European sites themselves may occur but will be limited to appropriate development such as fencing, signposting etc.
• Increased visits to the European sites, possibly with associated disturbance of fauna and impacts on the habitats (e.g. through trampling).
• Increased traffic or industry, leading to increased air pollution, which could affect species that are sensitive to air quality (e.g. lichens).

2.3.4 As part of the AA process it is also important to consider the ‘in combination’ effect of plans and proposals in the areas adjoining or close to Reigate & Banstead borough. Table 2.2 summarises the information collected to date. A number of Authorities are also undertaking Appropriate Assessments and have therefore been contacted by Reigate & Banstead and Mole Valley to further enhance the Councils’ understanding of the potential impacts on Natura 2000 sites in the area, particularly where it may relate to the Mole Gap to Reigate Escarpment SAC.

Table 2.2  Development plans and proposals in and around the borough

<table>
<thead>
<tr>
<th>Authority / Area</th>
<th>Plans / Proposals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tandridge District Council: Core Strategy</td>
<td>2,500 homes proposed to 2026, an annual average of 125 dwellings. Tandridge District Council prepared its AA up to Stage 1 ‘Screening’ in partnership with Mole Valley DC and Reigate &amp; Banstead BC (RBBC). In consultation with Natural England Tandridge ‘screened out’ any significant ‘in combination’ impact from proposed development in the District on any SAC / SPA. The report considers that it has no direct control over issues such as air pollution and recreation pressures.</td>
</tr>
<tr>
<td>Epsom &amp; Ewell Borough Council: Core Strategy</td>
<td>2,715 homes are to be provided 2007 – 2022, with an annual average of 181 dwellings per year, as set out in the Epsom &amp; Ewell Adopted Core Strategy.</td>
</tr>
<tr>
<td>Elmbridge Borough Council: Core Strategy</td>
<td>3,375 homes are proposed in Elmbridge, annual average of 225 dwellings, between 2011 and 2026.</td>
</tr>
<tr>
<td>Royal Borough of Kingston: Core Strategy and Area Action Plan</td>
<td>Approx 385 homes pa. (London Plan) are proposed (2009 data). The majority of the Borough is some distance from the boundaries of RBBC.</td>
</tr>
<tr>
<td>Guildford Borough Council: Core Strategy</td>
<td>Housing numbers are being determined as part of the emerging Local Development Scheme. The AA of the Core Strategy indicates that potential developments in the area could result in an increase in air pollution in the vicinity of the Mole Gap to Reigate Escarpment; however it was not felt to be significant and proposals will be contained within the document to assist in reducing any impact.</td>
</tr>
<tr>
<td>Authority / Area</td>
<td>Plans / Proposals</td>
</tr>
<tr>
<td>---------------------------------------------</td>
<td>---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Waverley Borough Council</td>
<td>4,600 homes are proposed for the borough to 2026. The Core Strategy has been withdrawn and information on AA is not currently available. Any development is however likely to be some distance from the RBBC boundary.</td>
</tr>
<tr>
<td>Horsham District Council: Core Strategy and other LDF Documents</td>
<td>The Core Strategy was adopted in 2007. This proposed 10,575 homes and supporting infrastructure in the period to 2018 (of which 2,000 are to be West of Horsham and 2,500 West of Crawley). A revised Core Strategy, for the period 2011 to 2031, is now being prepared for updated housing numbers. The Council is consulting on proposed housing number options between 635 and 820 per year. An AA was undertaken for the 2007 Core Strategy. It concluded that existing and potential air pollution arising from development proposals were a wider issue to be dealt with at a regional level. Other concerns related to water issues to the south of the District. Of particular interest was the conclusion that proposals will not have a significant effect on the Mole Gap to Reigate Escarpment.</td>
</tr>
<tr>
<td>Crawley borough Council: Core Strategy</td>
<td>The Core Strategy for 2001 to 2016 has been adopted (2007) and sets out plans for 300 dwellings a year. The Core Strategy is currently being revised and will include plans for higher housing figures. There are also plans for major town centre works and improvements to the M23 Junctions near Gatwick. There is also a need to take account of the predicted growth in air travel.</td>
</tr>
<tr>
<td>Wealden District Council</td>
<td>9,600 homes proposed to 2030 (subject to examination of the Core Strategy). The Core Strategy was accompanied by Appropriate Assessment.</td>
</tr>
<tr>
<td>Croydon Borough Council</td>
<td>20,200 homes between 2011 and 2031 (draft); 1,010 homes per year as an annual average.</td>
</tr>
<tr>
<td>Sutton Borough Council</td>
<td>5,124 homes between 2009 and 2024; 354 annual average.</td>
</tr>
<tr>
<td>Surrey Waste Plan</td>
<td>The AA of that document, prepared in consultation with Natural England and the Environment Agency, identified that the resultant emissions from traffic and dust, human disturbance, land take, water discharge, pest and predators, and litter from the proposals will not result in any adverse impact on sites. There was however concerns about emissions from a number of thermal processing facilities and it were proposed that these were removed from the plan.</td>
</tr>
<tr>
<td>Surrey County Council Local Transport Plan</td>
<td>One of the objectives is to support a change in travel patterns reducing the reliance on the car, and no new major roads are anticipated in Reigate &amp; Banstead. Therefore it is not felt that this will have a detrimental impact on European sites in the vicinity, and may actually help to reduce some of the adverse impacts currently being experienced.</td>
</tr>
<tr>
<td>Surrey Hills AONB Management Plan 2004 - 2009</td>
<td>The Surrey Hills AONB Management Plan is currently being revised.</td>
</tr>
<tr>
<td>Surrey Minerals Plan</td>
<td>The Habitats Regulations Assessment Report (2009) concludes that the implementation of no part of the plan will adversely affect the overall integrity of the Mole Gap to Reigate Escarpment SAC.</td>
</tr>
</tbody>
</table>
2.4 Approach to Screening Assessment

2.4.1 The (Stage 1) ‘screening process’ AA (April 2007) involved the assessment of each identified Natura 2000 Site against the possible effects (as anticipated at that Stage), of the developing Core Strategy, based on the initial housing allocation of 7,740 units within the Plan period (the allocation set out in the draft South East Plan) and taking on board the existing trends and plans as set out above. The screening process helped to identify the main potential impacts and in-combination impacts of the Core Strategy on the Natura 2000 sites. The Stage 1 Assessment report was submitted to Natural England for their comment, and their response of 26 June 2007 (Appendix 2) was taken into account in undertaking the next stage of the AA. In their response on the Screening Assessment Natural England agreed with the Council's conclusion that no Natura 2000 sites could be screened out at that early stage of the AA. However, they agreed with the Council’s assessment, that impacts of those interactions which had been listed as ‘screened out,’ were unlikely.

2.4.2 In March 2008, the Stage 2 (Site by Site) AA was undertaken of the revisited Preferred Options (based on a housing allocation of 7,740 units. The Council again consulted Natural England. Their response of 10 April 2008 (Appendix 2) provided guidance on the five key impacts of the Core Strategy, which were not screened out by the Council.

2.4.3 Reigate & Banstead Borough Council reviewed the Core Strategy to take account of public consultation, earlier phases of the HRA process and following the publication of the draft South East Plan. The submitted Core Strategy of March 2009 which provided for a higher allocation of housing units (9,240), was accompanied by an AA (November 2008). Reference is made to Appendix 1 for analysis of those potential adverse effects which were ‘screened out’ following consultation at the screening and preferred options stages of the HRA. Table 2.3 (summarised in Section 2.4.8) provides an outline of the issues which were not screened out and which were therefore taken through to more detailed Stage 2 (AA) assessment. Any significant in-combination effects were now ruled out except for those listed in Section 2.4.8 below.
2.4.4 A further increase in housing allocation was proposed in the later submission, ‘Amendments proposed for the Inspector,’ February 2010. The document proposed 10,000 units, with a ‘notional higher unit scenario’ of 12,500 units. At that time, Reigate & Banstead Borough Council reviewed the screening assessment and concluded that because the spatial distribution of the houses will be the same as originally proposed, and that no additional areas of housing/development were planned, the potential interactions between the Core Strategy and the Natura 2000 sites, and therefore the main potential impacts of the Core Strategy, will also be the same as above. The HRA Assessment (August 2009) which accompanied the February 2010 report concluded that sufficient avoidance measures were contained within the Appropriate Assessment to avoid adverse effects on the European Sites. Comments from Natural England (27 July 2009) on the final draft of the Assessment, agreeing with the conclusions of the AA, are provided in Appendix 2.

2.4.5 The Core Strategy 2012 will provide for a spatial distribution of proposed housing which is broadly as proposed before, with modifications in the later stage of the Plan period (Section 2.2). The Council therefore considers that the main potential interactions, and therefore the main potential impacts of the Core Strategy will also be the same as proposed in the AA of August 2009. The 6,900 housing units now proposed is considerably less than proposed in the previous document for which AA was undertaken (February 2010). Therefore it is considered that any potential impacts will be reduced further.

Consideration of the Screening Stage of the SE Plan

2.4.6 The Appropriate Assessment Screening of the Draft South East Plan identified a range of key environmental trends that could have a negative effect on the environment of the South East:

- Water demand and availability including supply demand balance, annual abstraction tares, household consumption, leakage and water demand
- Energy consumption
- Waste arising
- Road traffic / traffic growth
- Nitrates in ground water
- Flood risk
- Future climate change in the South East
- Recreational pressure on European sites
2.4.7 The AA of the Regional Spatial Strategy (the South East Plan) could not conclude that there was no adverse effect of the Plan on the Mole Gap to Reigate Escarpment due to the adverse effects of reduced air quality, increased recreational pressures and urbanisation (land-take, light pollution, rubbish dumping etc). In addition the site-specific issue relating to an important roosting population of Bechstein bat was identified.

Screening Assessment

2.4.8 The key potential impacts of the Core Strategy are summarised as:

<table>
<thead>
<tr>
<th>SAC</th>
<th>Potential impacts</th>
<th>Potentially arising from:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mole Gap to Reigate Escarpment SAC</td>
<td>• Potential impacts on habitat due to increased recreational usage</td>
<td>• Core Strategy and in-combination with other plans</td>
</tr>
<tr>
<td></td>
<td>• Potential impact on habitat due to maintenance (and risk of cessation) of grazing</td>
<td>• In-combination with other plans</td>
</tr>
<tr>
<td></td>
<td>• Potential impact on habitat due to increased air pollution</td>
<td>• Core Strategy and in-combination effects. (NB this is a regional issue)</td>
</tr>
<tr>
<td></td>
<td>• Potential disturbance to roosting populations of <em>Bechstein bats</em>, a European Protected Species</td>
<td>• In combination with other plans.</td>
</tr>
<tr>
<td>Protection of European Protected Species outside European designated Site Boundaries</td>
<td>• Potential disturbance to roosting populations of <em>Bechstein bats</em>, a European Protected Species (section 2.4.7)</td>
<td>• In combination with other plans.</td>
</tr>
<tr>
<td>Ashdown Forest SAC and SPA</td>
<td>• Potential impact on nationally important bird populations due to increased recreational usage</td>
<td>Core Strategy and in combination with other plans (R&amp;B effects likely to be very limited)</td>
</tr>
<tr>
<td></td>
<td>• Potential air pollution</td>
<td>• Core Strategy and in combination with other plans (R&amp;B effects likely to be very limited)</td>
</tr>
</tbody>
</table>
2.4.9 As a result of the screening process it was considered that there was a risk that the Core Strategy could have ‘in-combination’ adverse effects which require further analysis in relation to recreational disturbance, air pollution and the site specific issue of the Bechstein Bat. These issues were addressed at the Stage 2 AA in so far as the planning system allows. Natural England’s letter of 26 June 2007 agreed with the Council’s conclusion that no sites identified at that stage could be screened out of the AA, however they agreed with the Council’s assessment that the impacts of those interactions, which had been listed as ‘screened out,’ were unlikely. A copy of their letter is attached, Appendix 2. As discussed above, as a result of the further work undertaken on the preparation of the Core Strategy, all potential impacts other than those listed above, and described in Table 2.3, were ruled out.

2.4.10 Natural England’s guidance (letter of 10 April 2008) was taken into account in the final stages of the AA, which includes a record of a policy-by-policy Appropriate Assessment of potential impacts, and where appropriate, a more detailed consideration of avoidance measures. Natural England’s comments on the final draft of the November 2008 AA report (letter of 19 November 2008, included in Appendix 2) and on the draft of the August 2009 AA report, agreeing with the approach and conclusions to the AA, (letter of 27 July 2009) are incorporated into this current AA report.

2.4.11 For reasons provided in Section 2.4.5, it is considered that the screening assessment for the Core Strategy of March 2012 will be no different from the screening assessment of the earlier Core Strategies, and as provided in the earlier HRA reports. Natural England agreed this approach in their letter of 15 February 2012, referring to the draft of this AA report (Appendix 2).
### Table 2.3  Potential Impacts of the Core Strategy

<table>
<thead>
<tr>
<th>Site and Qualifying features</th>
<th>Vulnerability</th>
<th>Possible impacts arising from Core Strategy</th>
<th>Possible in combination impacts from other trends, plans, etc.</th>
<th>Risk of significant ‘in combination’ effects?</th>
</tr>
</thead>
<tbody>
<tr>
<td>MOLE GAP TO REIGATE ESCARPMENT SAC</td>
<td>Vulnerable to recreational pressure.</td>
<td>Additional development, population growth and increase emphasis on healthy lifestyles may lead to more visitors.</td>
<td>The recreational pressure is mainly around honeypot sites, which are primarily visited by tourists although some local and regular visits are made. Increased numbers of visitors as a result of developments in other areas may in combination increase pressure on the site.</td>
<td>Yes. Further work is being undertaken with Mole Valley DC, Tandridge DC, Surrey CC, The National Trust to ensure positive visitor management around honeypot sites and appropriate policies contained within relevant authorities’ LDFs. Interaction taken through to next stage of the AA process.</td>
</tr>
</tbody>
</table>

Only known outstanding locality in the United Kingdom of stable communities of Box woodland *Buxus sempervirens* on rock slopes.

One of best areas in UK for Chalk grassland *Festuco-Brometalia*. Important orchid sites Yew *Taxus baccata* woodland.

Significant presence of: European dry heaths; Beech forests *Asperulo-Fagetum;* Great Crested Newt *Triturus cristatus;* Bechstein’s bat *Myotis bechsteinii.*
<table>
<thead>
<tr>
<th>Site and Qualifying features</th>
<th>Vulnerability</th>
<th>Possible impacts arising from Core Strategy</th>
<th>Possible in combination impacts from other trends, plans, etc.</th>
<th>Risk of significant ‘in combination’ effects?</th>
</tr>
</thead>
<tbody>
<tr>
<td>There is a need to maintain a sympathetic grazing regime on chalk grassland (including important orchid sites) and dry heaths. Management is being addressed through Site Management Plans.</td>
<td>None</td>
<td>There is the potential for competition for financial resources for grazing and stock fencing.</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>There is a possibility of increased public objection to grazing management plans / stock fencing with increasing visitor numbers. This is unlikely due to use of cattle rather than sheep which enables public access through grazed areas.</td>
<td>To avoid impact, Reigate &amp; Banstead BC will work with other landowners / managers to try to include sympathetic grazing regime in site management plans, utilise Section 106 funding to provide necessary infrastructure to enable grazing of the SAC to continue in conjunction with proposals to manage visitor pressure.</td>
<td></td>
</tr>
<tr>
<td>Possible disturbance to grazing animals due to increasing visitor numbers.</td>
<td>Interaction taken through to next stage of the AA process</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Site and Qualifying features</td>
<td>Vulnerability</td>
<td>Possible impacts arising from Core Strategy</td>
<td>Possible in combination impacts from other trends, plans, etc.</td>
<td>Risk of significant ‘in combination’ effects?</td>
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</tr>
<tr>
<td>Chalk downland flora may be threatened by atmospheric pollution, as a result of competition from more vigorous and acid-loving species. Atmospheric pollution may also increase susceptibility of beech trees to disease.</td>
<td>Potential air pollution emissions from development and additional traffic related to the new housing sites. In discussion with Natural England it has been suggested that nitrogen deposition as a result of increased development in combination with significant new roads is an issue when within 200m of a site. On a more regional level nitrogen deposition will be dealt with through the SE Plan.</td>
<td>There is a possibility of a general worsening of air quality from continued growth of air traffic, particularly at Gatwick airport. Development within the region that results in an increase in traffic or emissions from homes or businesses can contribute to air pollution.</td>
<td>Local effect not significant (Note: this is a regional issue; in-combination effects to be assessed at a regional level)</td>
<td></td>
</tr>
<tr>
<td>Bechstein's bat <em>Myotis bechsteini</em></td>
<td>Bechstein bats use the SAC site and surrounding areas. Natural England is currently working with local bat surveyors to locate maternity roosts, and to gain a better understanding of the movement and requirements of bats on this site. There is a need for careful management of the trees and shrub layer and an appropriate level of protection for the habitats that form their foraging grounds.</td>
<td>The loss of trees and hedges through development may be damaging to their flight lines</td>
<td>Possible loss of trees and hedges over a wider area may be damaging to flight lines.</td>
<td>This interaction was originally screened out of the Appropriate Assessment. However following the Appropriate Assessment of the SE Plan the issue is now included in the next stage of this AA because of the wider issue of protecting areas outside European site boundaries</td>
</tr>
</tbody>
</table>

*Interaction taken through to next stage of the AA process*
<table>
<thead>
<tr>
<th>Site and Qualifying features</th>
<th>Vulnerability</th>
<th>Possible impacts arising from Core Strategy</th>
<th>Possible in combination impacts from other trends, plans, etc.</th>
<th>Risk of significant ‘in combination’ effects?</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Ashdown Forest SAC and SPA</strong></td>
<td>The SAC: One of the most extensive areas of heathland in southeast England. In particular:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>One of the best areas in UK for:</td>
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</tr>
<tr>
<td></td>
<td>• Northern Atlantic wet heaths with cross-leaved heath <em>Erica tetralix</em></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• European dry heaths</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Significant presence of: Great Crested Newt <em>Triturus cristatus</em>.</td>
<td></td>
<td></td>
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</tr>
<tr>
<td></td>
<td>The bird populations are vulnerable to recreational disturbance (e.g. dog walking).</td>
<td>There is a small possibility that new housing in Horley could increase recreational pressure on SAC heathland habitats. Possibility of very limited impact.</td>
<td>Possible combined pressures for increased access and recreation from new developments in Mid Sussex.</td>
<td>Not significant.</td>
</tr>
<tr>
<td></td>
<td>There is a need to manage access to reduce damage to paths and rights of way.</td>
<td>Likely that M23 will provide sufficient separation from new development in R&amp;B to deter access harmful to SPA bird interest, e.g. by dog walkers and cats.</td>
<td>Path erosion could be accelerated in combination with climate change and the long-term drying-out of the site.</td>
<td>Avoided by inviting Wealden District Council and East Sussex County Council to comment of Reigate &amp; Banstead’s approach to the Core Strategy and AA. Promote joint working on monitoring and management of recreational pressure on SAC/SPA. <em>Interaction taken through to next stage of the AA process.</em></td>
</tr>
<tr>
<td>Site and Qualifying features</td>
<td>Vulnerability</td>
<td>Possible impacts arising from Core Strategy</td>
<td>Possible in combination impacts from other trends, plans, etc.</td>
<td>Risk of significant ‘in combination’ effects?</td>
</tr>
<tr>
<td>-----------------------------</td>
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<td>--------------------------------------------</td>
</tr>
<tr>
<td>The SPA:</td>
<td>Minimal air pollution (nitrogen deposition can cause compositional changes over time)</td>
<td>Limited impact (regional issue). Potential air pollution emissions from housing and additional traffic related to the new development in R&amp;B will be reduced by sustainable transport measures.</td>
<td>In combination with the air pollution contributions from the M23 motorway and Gatwick Airport which are located between the site and new development in Horley. Development of 14,000 new dwellings in Mid Sussex and 11,000 new units in Wealden District could increase traffic levels; East Grinstead development area may result in by-pass making A22 more attractive route for traffic and will add to this pressure.</td>
<td>Local effect not significant. (Note: regional issue: in combination effect could usefully be assessed at regional level. Interaction taken through to next stage of the AA process.</td>
</tr>
</tbody>
</table>
3 THE APPROPRIATE ASSESSMENT

3.1 Approach to the Appropriate Assessment

3.1.1 The purpose of Stage 2 is to assess the ‘in-combination’ effects of plans on those key features of a European site most at risk from significant change. At the conclusion of Stage 2 the AA should ideally conclude that the proposals in the Core Strategy and plans of other local authorities located close to the borough pose no risks of in-combination effects.

3.1.2 In order to conclude Stage 2, Reigate & Banstead has taken the following approach during the preparation of all stages of the AA.

**Review of Potential Interactions**

3.1.3 Reigate & Banstead reviewed the screening exercise in the light of the developments in the Core Strategy and other Plans, and the South East Plan at all stages of the HRA.

3.1.4 Specifically Reigate & Banstead evaluated whether changes (highlighted in Section 1.3.2) to the Core Strategy of March 2012 would affect the screening. It is considered that the Core Strategy will lead to the same potential *interactions* with the Natura 2000 sites, as those addressed at the screening stage. Therefore it was considered that the potential impacts which were listed as screened out at the Screening Stage, should still be screened out. The inclusion of the Protection of European Species Bechstein's bat *Myotis bechsteini*, which had been previously screened out at the screening stage, and was then included at the Submission Draft stage following a review of the site specific issues identified by the AA of the draft South East Plan, remains included.

3.1.5 Following on from the review of the screening assessment, Reigate & Banstead then evaluated whether the changes to the Core Strategy would alter the conclusions relating to the *impacts* on these Natura 2000 sites, and whether further avoidance measures were required. Reigate & Banstead considers that the changes will not alter the conclusions drawn for the following reasons.

- The spatial distribution of the housing remains broadly as proposed in the Core Strategy of March 2009, and in the original Preferred Options, and as assessed at the AA screening stage.

- Natural England agreed to the conclusions of the HRA of the previous (August 2009) submission, which proposed 10,000 units, with a notional
The higher figure of 12,500 housing units. Less housing units are now proposed within the plan period than the previous submission.

- The majority of the recreational pressure on the SAC is still considered to be due to visitors from outside the Reigate & Banstead area and therefore outside the control of Reigate & Banstead Borough Council’s Core Strategy. 81% of visitors to Reigate Hill are from over 15 miles away (see Appendix 3).

- The majority of housing is still planned to be located mostly in Redhill and Horley town centres and in the regeneration areas of Preston and Merstham, and the two new neighbourhoods in Horley, all at some distance from the Mole Gap and Reigate Escarpment SAC. Up-grading of existing open spaces in proximity to the regeneration areas, the provision of the Riverside Green Chain, around Horley, and improvements to Green Infrastructure within Redhill will all help cater for the additional recreational demand in proximity to these housing areas, therefore reducing the recreational demand of local people on the SAC, as previously described.

- This Core Strategy does not include the 800m buffer around the SAC which had been included in the earlier documents, for reasons provided in Section 3.2.19 below. Instead the policy emphasises the requirement for HRA of development proposals which would enable the identification of any specific mitigation or avoidance measures associated with individual projects, which could become requirements for Section 106 agreements.

- As stated in the previous submission, the Council’s is developing plans for Green Infrastructure improvements throughout the borough. This will help to reduce recreational impacts through encouraging the use of alternative existing recreational areas for the local population. Projects associated with avoiding potential effects of development will be included within the Infrastructure Delivery Plan. Additionally, through this Core Strategy, the role of Green Infrastructure is strengthened, as the delivery mechanism for avoidance measures, with funding through developer contributions and other mechanisms as appropriate.

- Other changes to the Core Strategy, such as the further clarity on the provision of employment and retail, do not alter the screening, as there is no change to spatial distribution.
Avoidance Measures

3.1.6 Within the AA of the Core Strategy submitted in March 2009, Reigate & Banstead proposed the following safeguard for the SAC to help avoid the impact of new local development:

- Proposed presumption against all development within 800m of the SAC
- Reigate & Banstead proposes to consider the impacts of any proposed housing site within 800m of the SAC, and the need for avoidance of harm on a case-by-case basis (see Section 3.2).

3.1.7 The 800m buffer around the SAC is no longer proposed. The reasons for this are provided in Section 3.2.19. The provision of the buffer is replaced by a statement on the requirement for HRA of projects. This approach was agreed with Natural England in December 2011, and confirmed in their letter of 15 February 2012 (referring to the draft of this AA report, Appendix 2).

3.1.8 The Council considered the need for the introduction of further measures in order to avoid adverse impacts on the SAC. The Council considers that because the spatial distribution proposed will be broadly as originally proposed, further avoidance measures are not required. However towards the end of the plan period, there may be a need to consider sustainable urban extensions which may require release of greenfield sites. The inclusion of search criteria (see section 2.2.11), will further help to avoid urbanising effects on the SAC.

3.1.9 Clarification on the avoidance measures, as agreed with Natural England (December 2011), is incorporated into this Assessment.

3.1.10 Reigate & Banstead’s AA of the Core Strategy therefore focuses on the following interactions:

- Mole Gap to Reigate Escarpment SAC
  - Recreational disturbance
  - Maintenance (and cessation) of grazing
  - Air quality
  - Protection of European Protected Species Bechstein’s bat *Myotibechsteini*
- Ashdown Forest SAC and SPA
  - Recreation disturbance
  - Air quality
3.1.11 The other potential interactions of the Core Strategy which were listed as ‘screened out’ at the Stage 1 (Screening Stage) of the AA, are provided in Appendix 1b.

Policy-by-Policy Assessment

3.1.12 A Stage 2 AA policy-by-policy examination of the potential impacts of the Reigate & Banstead Core Strategy policies on the SAC was then undertaken (Section 3.8 below). This policy-by-policy approach considers the interactions between each of the policies and the SAC, in terms of the link between the source of impact, the mechanism or pathways for impact, and sensitive receptors. No new policy-receptor links were made, providing useful feedback to the AA that Reigate & Banstead have covered all the likely interactions.

3.1.13 This analysis helps to identify specifically where any potential effects can arise, therefore assisting in the development of suitable focused avoidance measures. This policy-by-policy approach provided a useful input into the overall assessment, and in the development of the Core Strategy.

Development of Avoidance Measures

3.1.14 When undertaking an AA, avoidance measures were identified where it could not be demonstrated that there will be no adverse effects on the sites’ integrity. At this stage of the AA, the Council reviewed the earlier analysis of potential impacts, and where appropriate developed more detailed avoidance measures in the light of the more specific Core Strategy policies (see policy by policy assessment, Section 3.8).

This Section of the Report

3.1.15 Sections 3.2 – 8 below reports on the findings of this assessment, and indicates how through an analysis of the policy-by-policy approach, and with the proposed avoidance measures, it can be concluded that the Core Strategy will not adversely affect the SACs.
3.2 Recreational Disturbance at Mole Gap to Reigate Escarpment SAC

3.2.1 The Mole Gap to Reigate Escarpment SAC is located within the Mole Valley District boundaries and extends eastwards into Reigate & Banstead borough. It lies within 200m of Reigate, 250m of the outskirts of Dorking, and around 400m from the outskirts of Fetcham and Bookham. The SAC is also close to Leatherhead and within 4km of the centre of Redhill.

3.2.2 The Reigate & Banstead Core Strategy directs new housing to previously developed land, thereby preventing the loss of open space and safeguarding the Green Belt. A proportion of these homes will take the form of, as yet, unidentified infill development sites, the locations of which are impossible to predict. It is possible that a small proportion of this development may take place in locations within 5km of the SAC. However, the majority of new homes in the borough will be located in Redhill town centre and in two planned new neighbourhoods in Horley.

3.2.3 The regeneration areas of Preston, Merstham, Redhill Town Centre and Horley incorporate the upgrading and provision of new Green Infrastructure, which along with existing open spaces, Green Belt and other nationally and locally protected areas, will provide substantial open space for local residents.

3.2.4 The Mole Valley Core Strategy identifies approximately 660 new homes in Dorking, 400 in Bookham, 200 in Fetcham and 930 in Leatherhead. A large proportion already has permission or has been completed. Although no large residential or commercial developments are planned in or around Dorking, Leatherhead, Fetcham, Bookham or Reigate and development is more likely to be in the form of infill or small scale extensions to built-up areas; the cumulative effect could be detrimental to the SAC.

3.2.5 Thus, in principle, new housing proposed by both Mole Valley’s and Reigate & Banstead’s Core Strategy could result in an increase in visitors to the SAC and could have a significant impact on the Mole Gap to Reigate SAC. However it is important to understand the type of recreational pressures affecting the SAC and where the visitors come from.
**‘Honeypot’ sites**

3.2.6 Correspondence from Natural England to both Authorities advises that recreational pressure at the Mole Gap to Reigate Escarpment is focused mainly around honeypot sites, primarily visited by tourists although some local and regular visits are made. In Reigate & Banstead the main honeypot locations are Reigate Hill Viewpoint (Wray Lane), the Ingliss Memorial and the North Downs Way leading westwards towards Mole Valley. Reigate Hill Fort, located along the path of the North Downs Way, is also now open to the public and may become a seasonal focus of interest. In Mole Valley the SAC incorporates the honeypot location of Box Hill, which has a larger visitor catchment than the viewpoints located within Reigate & Banstead.

3.2.7 The key habitats were identified at the screening stage. Woodland habitats such as those of box, yew and beech are less vulnerable to trampling pressure. Chalk downland habitat, including important orchid sites and also European dry heaths, are particularly vulnerable to damage by excessive trampling and are easily eroded.

3.2.8 Survey information on visitor numbers and origin is scant but Professor Calver of Bournemouth University undertook a survey on behalf of the National Trust during 2005 and 2006. One of the survey locations was Wray Lane Car Park / Gatton Park entrance, immediately adjacent to the Mole Gap to Reigate Escarpment SAC. Bournemouth University reported that the Wray lane/Gatton Car Park was hardly used by local people. There was found to be a large visitor impact within 100m of the car park but beyond approximately 1 km of the car park the impact was very low. The effects were mostly the trampling of grass, and litter.

3.2.9 Bournemouth University’s research noted that the vast majority of visitors come by car, and of those surveyed at the car park 93% had travelled from over 5 miles away and 81% had travelled from over 15 miles away, via the M25. Similar survey results were obtained from the surveys of Box Hill, Headley Heath and Leith Hill within Mole Valley DC. Data from this survey are presented in Appendix 3.

3.2.10 Further survey data from the National Trust also appears to support the work of Bournemouth University. In 2004 visitors to Box Hill were asked to note down the postcode from which they had travelled. There were over 5,300 responses. The results showed that there was a considerable spread in terms of visitor origin but that the main sources were Leatherhead and South London including Sutton, Carshalton and Croydon. Further more detailed information is contained in Appendix 3.
3.2.11 The data support the conclusions of other recreation studies by Bournemouth University of non-pay-for-entry properties, that 80-88% of visitors arrive by car, and that the numbers of visitors are dependent on a wide variety of factors, such as the characteristics of the site, the accessibility of the local road network and car park capacity, factors which have been taken into account in developing plans for visitor management at these honeypot sites.

3.2.12 Given that a very large percentage of visitors to the SAC are from outside the borough and District visiting honeypot locations, it is considered that the new development proposed within Reigate & Banstead BC and Mole Valley DC will have no adverse impact on the integrity of the SAC alone or in combination with other plans or projects.

Reigate & Banstead Open Space Assessment

3.2.13 Both Local Authorities have undertaken assessments of open space, sports and recreation facilities, known as Open Space Assessments (PPG17)\(^4\). The Open Space assessment for Reigate & Banstead Borough Council identifies that provision of outdoor recreation is reasonable, or good in certain areas. The current provision of natural, semi-natural green space in the borough stands at approximately 2,222ha (in private and public ownership). Some 1,425 ha, or 10 ha/1,000 people is fully accessible space. Assuming no loss of such land, there would be approximately 9ha/1,000 people by the end of the Plan period. 1,200 ha are managed by the Council as publically accessible green space. There are also two nature reserve sites that provide 10,108sqm of open space. All the open spaces in the borough, i.e. amenity space, green corridors, parks, and natural and semi-natural green space, are supplemented by the Green Belt. Within Mole Valley the assessment has identified that, for the most part, outdoor recreation is well-catered for in the District, with significant areas of natural and semi-natural green space available to local residents. In total there is over 2,700ha of natural and semi-natural green space, this equates to a provision of about 34ha per 1,000 people.

3.2.14 The approach adopted by Reigate & Banstead Borough Council is to provide more green space as a combined effort with the provision of housing in the regeneration areas, such as at the Horley Riverside Green Chain, Preston, Merstham, and Redhill, to help alleviate any deficiency. Green spaces in Preston and Merstham will be enhanced, more green spaces will be provided in Horley and more greening undertaken in Redhill. In Mole Valley the preferred approach will be to make best use of what is available in terms of this typology but that where there are significant deficiencies sites will be sought. This is

\(^4\) Reigate & Banstead Open Space, Sport and Recreation Assessment Revised Report August 2011
most likely to be for the purpose of children’s play areas and general amenity use.

3.2.15 Natural England recommends that natural and semi-natural green space be assessed against the ‘Accessible Natural Green Space Standards’ (ANGSt) in order to judge the level of provision in an area. The assessment of sites 100ha and above (equal to that of the Mole Gap to Reigate Escarpment) reveals a picture of provision focused to the north of the borough (see Figure 3.1). This leaves the southern part of the borough with less accessibility to these sites but it is important to keep in mind that all the open spaces in the borough are supplemented by the extensive Public Rights of Way within the Green Belt (which makes up 70% of the borough). Therefore most residents have good access to open space. Comparison with the ANGSt Standards indicates that whilst there are large accessible natural and semi-natural sites at a distance from housing, there are an insuficient number of small spaces near to homes. This is being addressed through policies to encourage provision of open space with development. In Mole Valley, in terms of an examination of sites of 100ha or above, the analysis shows that the vast majority of the District is within 5km of such a site and therefore meeting the ANGSt standard. Only small areas in the southeast of the District lack such a level of accessibility, although this area is very rural, with a very small population and there are extensive networks of public rights of way.

3.2.16 The PPG17 Assessment also examined the different types of open space and how long people expected to travel to access these spaces. Overall, a 15-minute walk (800m) was applicable to most types of open space. The study also showed that 56.7% of local residents walk when visiting a site and that the majority felt that up to 15 minutes (800m) was an acceptable distance. Only 37% would use a car, the remainder cycled or took public transport. However, the audit didn’t assess how often people specifically travel to the Mole Gap to Reigate Escarpment. This information can be used to give an idea as to the likely local ‘catchment’ of the Mole Gap to Reigate Escarpment and therefore indicate in very general terms that development within 800m of the SAC may have the greatest impact in terms of recreational use by local visitors. However, due to the large areas of natural / semi-natural green space available to residents, indications are that they visit a variety of sites across the borough and that therefore their impact is also likely to be dispersed.
Figure 3.1  Natural and Semi-Natural Green Space
In combination effects of other Plans on recreational disturbance

3.2.17 Where information is currently available, it is possible to conclude that, with respect to recreational pressure on the Mole Gap to Reigate Escarpment, no significant ‘in-combination’ effects will be experienced as a result of the Plans of other boroughs or districts. It is however difficult to fully assess this when clearly large number of visitors comes to the site, particularly the honeypot locations, from well outside Reigate & Banstead and Mole Valley boundaries. This is outside of the control of both Local Authorities and it will be necessary to ensure that all Authorities particularly those to the north of the SAC, which appear to be the source of many visitors, correctly consider the potential for adverse impact and that this is overseen by Natural England, whose responsibility it is to agree Stage 1: Scoping reports.

3.2.18 In its letter of 26th June 2007, referring to the Appropriate Assessment of the South East Plan, Natural England makes several general recommendations to prevent adverse effects on European and International sites as a result of increased recreation pressure. These include working together with other local authorities to consider possible measures to prevent adverse effects of these sites, and through the use of development contributions. These are now outlined in NRM 5 of the SE Plan, which states:

‘Local authorities and other bodies shall avoid a net loss of biodiversity and actively pursue opportunities to achieve a net gain..... by ........viii) identifying sites of international nature conservation interest.....sensitive to the pressures of recreation or urbanisation and, as appropriate working with Natural England and other stakeholders to set buffer zones around sensitive sites, provide alternative recreation land as mitigation for any possible adverse impacts...., implement management measures and work to secure improved habitat management’.

3.2.19 This was reflected in avoidance measures included in the earlier versions of the AA of the Core Strategy. In the light of recent discussions with Natural England, the 800m buffer is no longer proposed. This approach was agreed with Natural England, December 2011. This revision is based on the lack of evidence that a buffer of a specific distance would control adverse impacts of development on the SAC and because of difficulties in its implementation with recent changes in arrangements for collecting infrastructure payments. Instead, the policy emphasises the requirement for HRA of development proposals. This will enable the identification of any specific mitigation/avoidance measures associated with individual projects, which could become requirements for Section 106 agreements. In parallel, specific measures to avoid adverse impacts on the SAC will be delivered through the Green Infrastructure Strategy. This approach was
agreed by Natural England (letter of 15 February 2012, Appendix 2, referring to the draft of this report).

3.2.20 Although most of the visitors to the SAC are from outside the borough, and are visiting honeypot locations, Reigate & Banstead is committed to implementing measures to cater for the small but additional pressures exerted at these locations by local visitors. In their letter of 10 April 2008, Natural England generally agreed with Reigate & Banstead’s conclusion that additional recreation pressure as a result of the Core Strategy will be minimal and that this additional pressure can be managed via proposed avoidance measures so that there will be no adverse effect on the integrity of the SAC.

3.2.21 In accordance with the methodology, Reigate & Banstead has identified a number of measures to avoid or mitigate the potential adverse impacts of visitor recreational pressure. The Green Infrastructure Strategy will be the mechanism for delivery of these measures, with funding through developer contributions and other mechanisms as appropriate. Any site allocations will be made through the emerging Development Management Policies DPD. The Council will include in the Council’s Infrastructure Delivery Plan, any project which can be considered as supporting (or being needed by) new development, for which there is evidence of possible recreational impact, for delivery within the Plan period. These measures have been incorporated where relevant into the Core Strategy. The proposed avoidance measures are as follows:

- **Positive visitor management and access management**: As part of the Mole Gap to Reigate Escarpment SAC is owned by the Council and National Trust, there are opportunities for positive visitor management thorough site management agreements and consultation. Reigate & Banstead BC is working with the National Trust, the Surrey Hills AONB and other local authorities to identify appropriate management opportunities. This could include better signage to keep walkers on footpaths and away from sensitive habitats, high quality interpretation and other visitor information, enhanced site management, habitat creation and other mechanisms to manage visitor access. This programme will be developed in consultation with NE.

- **Site management around honeypot sites**: Reigate & Banstead will work with the National Trust and other agencies to encourage positive visitor management at honeypot sites so as to avoid potential adverse impacts at these locations.

- **Encouraging visitors to alternative sites in the vicinity of the SAC**: Reigate & Banstead will work with partners including local authorities where visitors come from, to encourage visitors to other areas, in order to reduce adverse impacts on the SAC.
• **New Open spaces and links.** Creation of new open spaces and links to the countryside near homes, and improvement of existing open spaces as part of the overall approach of the Core Strategy towards avoiding the impact of development and redevelopment on facilities. Reigate & Banstead will continue to promote the creation of new open space to accompany new housing development such as the Riverside Green Chain around Horley, and the green space planned within new redevelopment proposals as described in the Core Strategy.

• **Developer Contributions:** Securing developer contributions towards Green Infrastructure provision within the borough, where development would have an adverse effect on the SAC.

• **HRA Assessment:** Projects, including housing development proposals will be subject to assessment under the Habitats Regulations, and to the agreement of appropriate avoidance measures with Natural England.

• **Green Infrastructure:** Developing and implementing a Green Infrastructure Strategy which aims to direct the development of multi-functional green infrastructure across the borough, including measures to avoid potential adverse impacts on the SAC.

• **Monitoring:** Promotion of the monitoring of impacts and the effectiveness of avoidance measures. A monitoring programme will be established within the overall Local Development Framework monitoring programme.

3.2.22 To assist with the above, effective arrangements for joint working already exist within the Surrey Hills AONB, which includes the Mole Valley to Reigate Escarpment SAC, via the Surrey Hills AONB Board. Reigate & Banstead Borough Council, Mole Valley District Council, Natural England and the National Trust are all represented on the Surrey Hills Board, in addition to other local authorities, local organisations and Natural England. The Board has been reviewing the Management Plan for the AONB which it produces and implements via a range of partners. Reigate & Banstead will set up additional working arrangements with the National Trust and Natural England to deliver on the above measures, as necessary.

3.2.23 The impacts and effectiveness of avoidance measures will be monitored. Reigate & Banstead will promote the need to undertake a baseline assessment of current visitor pressure against which to monitor and manage visitor pressure in the future. However as the Reigate & Banstead ownership is relatively small, it is considered that the Surrey Hills Board provides a useful mechanism for progressing this work. This will take the form of monitoring the numbers of visitors and their origin, identifying the visitor area and assessing site-specific impacts, which will then be fed into proposals for visitor management and
habitat creation at the site. Monitoring the impacts could be undertaken through review of SSSI condition reports and via other mechanisms as appropriate.

3.2.24 Natural England supports the avoidance measures set out above (letter of 19 October 2008). Natural England further supports the approach and conclusions of this AA report (letter of 15 February 2012, referring to the draft of this AA Report, on the March 2012 Core Strategy, Appendix 2).

Conclusions

3.2.25 In their letter of 10 April 2008, Natural England generally agreed with Reigate & Banstead’s conclusion that additional recreation pressure as a result of the Core Strategy will be minimal and that this additional pressure can be managed via proposed avoidance measures so that there will be no adverse impact on the integrity of the SAC.

3.2.26 The AA of August 2009 concluded that any additional recreational pressure created by the Core Strategy, and any such pressure, in-combination with other current Plans, will be minimal. Natural England’s letter of July 2009 referring to the draft of the HRA report of the Council’s ‘Suggested Amendments proposed for the Inspector’ agreed with the conclusions made and the avoidance measures proposed.

3.2.27 As the spatial distribution of new homes now proposed is broadly as before, and as the number of homes now proposed will be lower, it is considered that the avoidance measures proposed will be adequate especially with the additional safeguards provided within the search criteria for urban extensions.

3.2.28 In the letter of 15 February 2012, referring to the draft of this report (Appendix 2), Natural England stated that it was satisfied that the revised Core Strategy ‘does not present any significant change in potential impacts …. on European sites compared to the earlier versions of the Core Strategy and HRA.’ Natural England was therefore able to maintain its ‘concurrence with the conclusions made in the revised AA of no likely significant effect of the Core Strategy on European sites.’ Natural England considered that, ‘with regard to the Mole Gap to Reigate Escarpment SAC, this takes into account the proposed avoidance measures set out in Section 3.2.21…..’of this report.

3.2.29 It is therefore considered that the implementation of the avoidance measures should result in no adverse impact on the integrity of the Mole Gap to Reigate Escarpment SAC due to recreational pressure.
3.3 Maintenance (& risk of cessation) of grazing Mole Gap-Reigate Escarpment SAC

Grazing chalk grassland habitats

3.3.1 Maintenance of a sympathetic grazing regime is key to the continued presence of chalk grassland (including important orchid sites) and dry heaths on the SAC. This is because grazing suppresses the growth of more competitive plant species and encourages a more diverse selection of plants within the grassland sward, compared to mowing, for example.

3.3.2 Some parts of the SAC that are owned or managed by the National Trust are grazed. Other areas, notably those owned and managed by the Borough Council, are kept open by mowing. Mowing can, to some extent, replicate the positive effects of grazing on the chalk habitat where grazing is impractical due to visitor pressure (e.g. in honeypot locations). Cattle, rather than sheep, have tended to be used to graze the SAC in recent years because they are more tolerant of people and dogs on the site.

3.3.3 Threats to the maintenance of grazing on the SAC include:

- Possible increase in public objection to stock fencing with increasing visitor numbers, although this can be lessened by the use of cattle rather than sheep which enables public access through grazed areas.
- Possible disturbance to grazing animals due to increasing visitor numbers.
- Competition for financial resources for grazing and stock fencing.

3.3.4 The PPG17 assessment promotes the provision of new and enhancement of existing alternative open space provision within the borough, thus diverting some local visitor pressure away from the SAC.

Proposed avoidance measures

3.3.5 Factors that will promote positive grazing management on the Mole Gap to Reigate Escarpment SAC which will be included in LDF documentation, include:

- Improved interpretation and continued joint working between Mole Valley and Reigate & Banstead Borough Councils to monitor and review visitor management methods
• Supporting improved visitor facilities on the SAC in conjunction with grazing infrastructure (such as fencing and visitor gates, for example) will help to address concerns about disturbance to grazing animals and financial resource constraints.

• The provision of new local open space provided within large developments and/or enhancement of existing alternative sites will help to reduce visitor pressure and potential associated disturbance of grazing stock on the SAC.

Conclusions

3.3.6 Natural England, in their letter of 10 April 2008 agrees that with the proposed avoidance measures in place (as listed above), it was unlikely that the Core Strategy would have an adverse effect on the Mole Gap to Reigate Escarpment SAC through lack of maintenance of grazing at specific locations.

3.3.7 The spatial distribution of houses remains broadly as before. The effect of this housing distribution was therefore already examined in the AA of November 2008. With the reduction in housing numbers, this further reduces any possible impact.

3.3.8 The Council proposes to work in partnership to positively manage grazing and visitor pressures on the SAC, to enhance existing and provide alternative local open space provision, and to support improved visitor facilities and grazing. It is considered that with these avoidance measures, the Core Strategy will not have an adverse effect on grazing within the Mole Gap to Reigate Escarpment SAC.

3.4 Air Quality at the Mole Gap to Reigate Escarpment SAC

Introduction

3.4.1 The UK Air Pollution Information System (Starters Guide) states the primary pollutants affecting terrestrial ecosystems are sulphur dioxide (SO\textsubscript{2}), nitrogen oxide (NO) and nitrogen dioxide (NO\textsubscript{2}), collectively termed nitrogen oxides (NO\textsubscript{x}). The main sources of SO\textsubscript{2} emissions are power generation, industry and domestic solid fuel combustion, and shipping. Man-made emissions of NO\textsubscript{x} come from power stations, motor vehicles, and other industrial and domestic combustion processes.

3.4.2 Primary pollutants are oxidised in the atmosphere to form aerosols. Aerosols can travel long distances, making air pollution a wider regional issue as well as a local consideration.
3.4.3 Ground-level ozone (O\textsubscript{3}) is also a pollutant and is primarily formed by sunlight-initiated oxidation of volatile organic compounds (VOCs) in the presence of NOx. Sources of VOCs include road transport emissions and other combustion processes, petrol distribution and handling. The Air Pollution Archive states that ozone levels are not as high in urban areas as in rural areas. This is because in urban areas high levels of NO are emitted from vehicles, and whilst NO\textsubscript{2} acts as a source of O\textsubscript{3}, NO destroys ozone acting as a local sink. Thus, ozone levels are usually highest in rural areas; particularly in hot, still, sunny weather conditions giving rise to ‘summer smog’. This fact is particularly pertinent to the Mole Gap to Reigate Escarpment SAC due to their predominantly ‘open’ locations outside of major towns.

3.4.4 The following effects of air pollution can occur on terrestrial ecosystems:

**Acidification**  
Sulphur dioxide (SO\textsubscript{2}) and nitrogen compounds (nitrate NO\textsubscript{3}), nitrogen dioxide (NO\textsubscript{2}) and nitric acid (HNO\textsubscript{3}) can increase acidification of soils. Acidification can adversely affect the natural neutralizing capacity of soils, a consequence of which includes a change in vegetation that can grow on the site.

**Eutrophication**  
Nitrogen oxides (NO\textsubscript{x}) and ammonia (NH\textsubscript{3}) can increase eutrophication. They essentially act as artificial fertilisers which cause some competitive plant species to dominate over slower-growing and generally rarer species. Nitrogen oxides are mainly derived from road transport emissions and other combustion processes such as the electricity supply industry. Ammonia is formed mainly from the decomposition of excreta or the use and production of fertilisers.

**Ozone exposure**  
Ground-level ozone, (O\textsubscript{3}), damages plants, including visible injury to foliage, reduction in growth rates and vulnerability to water stress.

**Regional air pollution trends**

3.4.5 Monitoring has shown a recent regional drop in NO\textsubscript{2} and SO\textsubscript{2} which in terms of NO\textsubscript{2} is expected to continue to fall in the short-term. The Sustainability Appraisal of the South East Plan (2006) states that levels of sulphur dioxide (SO\textsubscript{2}) are relatively low for most parts of the region, Figure 3.2 below illustrates the significant drop seen since 1992. Figure 3.3 illustrates NO\textsubscript{2} trends between 1991 and 2004, with the lowest levels of this pollutant being recorded in 2004.

3.4.6 Predictions for levels of NO\textsubscript{2} within the region in 2010 are shown in Figure 3.4. These are anticipated not to exceed the Air Quality Strategy levels in any part of the region; indeed, many parts of the region will benefit from very low levels of
this pollutant. It can be seen that within the region, levels are highest towards Gatwick, to the south but are still predicted to be between 16 and 32 ug/m$^3$ – significantly below the 40 ug/m$^3$ Air Quality Strategy objective.

3.4.7 It should be noted that 40ug/m$^3$ Air Quality Strategy objective is a human health-based standard and only applies where there is relevant exposure, i.e. people present. Nevertheless it also provides a standard against which to measure general trends in NO$_2$ levels, which may affect the habitats of Mole Gap to Reigate Escarpment SAC.

Figure 3.2 SO2 Levels in South East 1992-2004

![Figure 3.2 SO2 Levels in South East 1992-2004](image)

Figure 3.3 NO2 Levels in South East 1991-2004

![Figure 3.3 NO2 Levels in South East 1991-2004](image)
Locally generated air pollution

3.4.8 In addition to air pollution at a regional level, local sources of existing air pollution can be identified. Gatwick Airport is located close to the southern boundary of both Mole Valley and Reigate & Banstead, and the Mole Gap to Reigate Escarpment SAC is located at its closest point about 300m from the M25 motorway, which runs east-west to the immediate north of the designation.

3.4.9 Pollution levels from Gatwick Airport are regularly monitored but the effect of any increase in flights is currently unknown at this local level. In addition, there can be no direct links made between the Core Strategy and pollution from this source and any management is outside of the control of the Local Authority. It must therefore be regarded as a Regional issue.

3.4.10 In terms of the M25 the Highways Agency (Average Daily Flow report for 2006) estimates that on average 151,617 vehicles travel between junctions 8 and 9 (Reigate to Leatherhead section) every day. The Agency also has concerns about the traffic on Junction 9 and the long back-ups that can occur. Recent modelling by Surrey County Council examined the likely impact of new development within the borough, on the road network. This demonstrates that when compared to the existing high levels of traffic on the M25, and the projected high levels of traffic from elsewhere, any increase due to development within the borough is likely to be indistinguishable, especially as many residents of new properties come from the existing area and will already be undertaking these journeys.
The effects of air pollution on the Mole Gap to Reigate Escarpment SAC

3.4.11 The information on existing and possible future levels of pollution provides useful background data, but this must be coupled with an examination of whether this will actually lead to any damage to the SAC.

3.4.12 Table 3.1 shows existing levels of pollutants for the calcareous grassland of the SAC, one of the key habitats for which the Mole Gap to Reigate Escarpment was designated a SAC. This information focuses on 'critical load range', deposition and Critical Load Exceedance. Critical load can be defined as: “The threshold level for the deposition of a pollutant above which harmful indirect effects can be shown on a habitat or species, according to current knowledge”. Additional deposition above the critical load is termed “Critical Load Exceedance”.

Table 3.1 Approximate existing levels of air pollutants at the Mole Gap to Reigate Escarpment SAC

<table>
<thead>
<tr>
<th>Habitat</th>
<th>Pollutant (&amp; unit of measurement)</th>
<th>Critical load range</th>
<th>Deposition</th>
<th>Ozone exposure</th>
<th>% Critical Load Exceedance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Calcareous grassland</td>
<td>Acid deposition (keq/ha/yr)</td>
<td>4.00</td>
<td>1.73</td>
<td>-</td>
<td>Within critical load range</td>
</tr>
<tr>
<td></td>
<td>Nitrogen deposition (kg N/ha/yr)</td>
<td>15 - 25</td>
<td>19.2</td>
<td>-</td>
<td>Within critical load range</td>
</tr>
<tr>
<td></td>
<td>Ozone (ppb hours)</td>
<td>3000</td>
<td>-</td>
<td>4828</td>
<td>61%</td>
</tr>
</tbody>
</table>

Source: Air Pollution Information System (www.apis.ac.uk)

3.4.13 The following observations relate to existing pollution levels at the Mole Gap to Reigate Escarpment SAC. Any additional pollution resulting from new development would effectively add to any existing harmful effects:

Acidification Acid deposition on calcareous grassland habitats on this site is well within the critical load range, indicating no harmful indirect effects. The APIS website states that acidifying deposition is generally agreed to have little effect on calcareous grasslands since the calcareous soil provides ample neutralising capacity (mean pH 6.1), with large critical loads that are generally not exceeded.
Eutrophication  

Nitrogen deposition on calcareous grassland habitats on this site is also within the critical load range, indicating that currently there are no harmful indirect effects. However, the APIS website suggests that reports of species composition change associated with enhanced nitrogen loading on calcareous grasslands have become more widespread in recent years. Therefore it is important to monitor changes in nitrogen deposition at this site.

Ground level ozone  

Ozone exposure on calcareous grassland habitats on this particular site exceeds the critical load range by 61%, indicating harmful indirect effects, which is a cause for concern. Ground level ozone may result in visible injury to foliage, reduction in growth rate, selection against ozone sensitive genotypes and changed reaction to water stress.

3.4.14 Natural England also suggests that:

‘When considering the impact of traffic generated air pollution, it is necessary to consider any development allocation, or focus of development that falls within 200m of a European or international site. This would include any additional infrastructure, or upgrading of existing infrastructure, or indeed any allocation that would subsequently lead to such infrastructure development’

3.4.15 In this respect, it is noted that in both Authorities:

- There are currently no new roads planned within 200m of the SAC.
- No major developments are envisaged within 200m of the SAC, which could impact on existing roads.
- The anticipated future development is unlikely to lead to significant levels of extra traffic on the roads in the vicinity of the SAC. These roads are very rural and are not main routes through the borough.

3.4.16 Whilst the draft Transport Assessment of the Core Strategy shows that overall traffic flows are expected to increase on the main roads across the borough, most of this is not related to growth in Reigate & Banstead. Growth of traffic along the M25, which lies in proximity of certain sections of the SAC, is outside the control of Reigate & Banstead Borough Council.

3.4.17 In a wider context, it is likely that the increased development proposed by both Reigate & Banstead and Mole Valley’s Core Strategies will make a small contribution to regional air pollutant levels; however, it is impossible to clearly demonstrate the link between development proposed in the respective Core Strategies and air quality levels at the Mole Gap to Reigate Escarpment SAC and all other European sites within 15km of the Authorities boundaries. Measures in
both Core Strategies to promote a modal shift from car use to more sustainable transport systems will help to minimise the impact on air pollution created by increasing travel. Measure to reduce carbon emissions produced in the building and occupancy of new development will also help to lessen the contribution to the wider air pollution problem.

**In combination effects of other Plans on levels of air pollution**

**3.4.18** There are many development proposals within the Plans identified earlier in the AA which may increase the level of pollutants in the atmosphere; however, no one proposal is likely to have a significant effect in itself. Where information is currently available it is possible to conclude that no significant ‘in combination’ effects as a result of other borough or districts’ plans will be experienced on the Mole Gap to Reigate Escarpment. This will of course have to be monitored by all Authorities affected and overseen by Natural England, whose responsibility it is to agree Stage 1: Scoping reports.

**3.4.19** In addition it should be recognised that air quality is a regional issue and that transport planning and traffic management, a major contributor, is mostly outside the control of the borough Council. The Surrey Local Transport Plan covers the whole County and is used as the basis of all work on traffic and travel by all Authorities in the area, ensuring a comprehensive approach to addressing the issues. Improvements in technology may also contribute to offsetting any increase in traffic experienced as a result of development across the region, combined with a move towards greater public transport provision, walking and cycling region-wide.

**Proposed avoidance measures**

**3.4.20** To avoid potential effects of air pollution on the SAC, any proposal for development within 200m of the SAC, will be required to demonstrate that it will not, alone or in combination with other developments, have an adverse impact on the integrity of the site. In addition, factors that will promote improved air quality and which are incorporated where appropriate into the revised Core Strategy include:

- Promote a comprehensive modal shift from car to more sustainable forms of transport throughout the borough.
- Ensure that opportunities for the use of public transport exist in or near to development sites that are likely to result in an increase in traffic
- Model the transport effects of larger proposed developments as appropriate, so as to enable air pollution impacts to be investigated
- Look to implement more green travel plans
- Design sustainable transport facilities into new development
- Create sustainable transport routes and links between existing facilities

Policies will be included within the DMP to promote the above.

Conclusions

3.4.21 Natural England, in their letter of 10 April 2008, supported the avoidance measures proposed at that stage of the AA and agreed that the additional air pollution created by the proposals contained in the Core Strategy will be minimal. Natural England, in their letter of 27 July 2009 stated that they ‘concur that the avoidance measures set out within the AA will ensure the additional housing for the borough as confirmed in the revised Core Strategy….. will not have significant adverse effects on the Mole Gap to Reigate SAC and Ashdown Forest SAC/SPA through recreation pressure and air quality.’ Reigate & Banstead Borough Council considers that as the spatial distribution of the homes will be broadly as planned before, the Core Strategy will not cause adverse air quality impacts on the SAC with the proposed avoidance measures.

3.4.22 Currently no major development is planned within 200m of the SAC and development is unlikely to result in significant traffic in the vicinity. In addition proposals across the Region to encourage a shift from use of the car to public transport is likely to result in a continuing region wide reduction in these pollutants. Finally it is worth noting that, with the exception of Ozone, the current levels of pollutants are within the levels considered to cause damage to the site and that the level of development proposed is unlikely to have a significant if any effect on it.

3.4.23 There is a need to continue to monitor and be aware of the levels of pollutants on the SAC. However, the most likely sources of the majority of these pollutants are from the M25 motorway and Gatwick Airport, which are outside of the control of Reigate & Banstead Borough Council and Mole Valley District Council.

3.4.24 Reigate & Banstead will assess significant localised effects at a more local level, for example in relation to the site specific allocations of land (as suggested by Natural England), and by ensuring that modelling is undertaken of the transport effects of larger developments if appropriate.
3.5 Protecting Areas Outside European Site Boundaries

3.5.1 Regional air quality and recreation trends identified in the AA of the South East Plan have been considered in detail in the preceding sections of this report; however, the AA of the SEP considered that the impact of the plan on bats and urbanisation (land-take, light pollution, rubbish dumping etc) in the Mole Gap to Reigate Escarpment SAC needed to be examined.

3.5.2 Great Crested Newts were screened out at the Stage 1 AA of the Reigate & Banstead Core Strategy (Appendix 1a and 1b). Within the Mole Gap to Reigate Escarpment SAC, Great Crested Newts are located in ponds on Headley Heath. Although they require large foraging areas (500m radius or more from their spawning areas), the areas of development in both Mole Valley and Reigate & Banstead are located too far away from Headley Heath to have an adverse effect. It is not considered that any other Plans will impact on this species and therefore no in combination effect can be identified. The AA of the SEP concluded that it is unlikely that great crested newts will be adversely affected by development proposals.

3.5.3 Bechstein bats require foraging areas within 3.5km of the roosts and are mostly found during spring and summer, within ancient woodland. The AA of the SEP notes that important foraging areas in the South East tend to be protected through land ownership and so development should not result in the severing of major foraging grounds. Certainly this would appear to be generally true of the Mole Gap to Reigate Escarpment SAC, most of which is owned by local authorities or the National Trust. Ancient woodland is currently identified when comprising a site of over 20ha in size; however, a new survey is to be carried out in 2008 to identify smaller sites which will provide a far greater level of information. The AA of the SEP suggests that there are areas outside of the Mole Gap to Reigate Escarpment that are of importance as foraging and roosting sites for bats and that development could potentially result in the severance of bat flight paths between the SAC and surrounding areas. The AA of the SEP recommends consideration of a policy to protect against the severance of tree and hedge lines used as flight lines within 6km of the Mole Gap to Reigate Escarpment SAC boundary.

3.5.4 There is currently no information available specifically on bat flight lines and the Council is not in a position to obtain it. Neither is it in a position to protect all trees, hedgerows and water-courses, as much of this is outside the planning remit. However, through policies on biodiversity, design and landscaping within the LDF it can seek to ensure that where development takes place, mature trees, woodland, hedge-lines and watercourses / ponds are retained or, if replacement is needed, that this results in a net gain in biodiversity value. In this
way the development proposed in the LDF should not have a significant impact on the integrity of the site. In order to promote biodiversity across the whole borough it has been decided to apply this policy borough wide rather than to just a 6km buffer area. It is highly likely that there are significant bat populations across the borough that will benefit, not just those identified through the work on the AA. This is incorporated into the Core Strategy (CS1) and will be coordinated through the Green Infrastructure Strategy for the borough. With this measure in place it was concluded that the South East Plan would have no effect on this element of the integrity of the site.

3.5.5 Climate change is identified as a wider issue that could adversely affect Bechstein bats resulting in drier summers and wetter winters. The AA of the SEP suggests that lower water levels in summer could reduce the number of insects available for bats. Climate change has a well established link to air pollution, but this is a matter that can only be properly addressed at a regional level supported by action taken at a local level and therefore no specific measures are proposed in the AA as they are already dealt with through the Core Strategy.

3.5.6 Finally, the effects of urbanisation are difficult to control directly through the Core Strategy. No land within the SAC is proposed for development. However other issues such as vandalism, fires, rubbish etc can often be associated with recreational use of a site. It is considered that the policies in place to ensure that recreation does not harm the SAC can also be used to limit urbanising effects. The search criteria for identifying possible sites for sustainable urban extensions, will help further in reducing possible urbanising effects.
3.6 Recreational disturbance at Ashdown Forest SAC & SPA

Recreational impacts

3.6.1 In addition to new development elsewhere in the borough, Reigate & Banstead’s Core Strategy includes provision for new dwellings in Horley, the southern-most part of the borough located closest to the Ashdown Forest. It should be noted that the policy framework for the Horley area has already been adopted and the focus has now moved to implementation.

3.6.2 In its letter of 26th June 2007 Natural England advises Reigate & Banstead Borough Council that recreational pressure and disturbance at the Ashdown Forest is primarily a result of local and regular visits, although tourism is an additional factor for this site. In the same letter Natural England states that Ashdown Forest has some affinities with the Thames Basin Heaths (as lowland heathland supporting both nightjar and Dartford warbler). On this basis, and in the absence of any other evidence available, Natural England concludes that new residential development within Reigate & Banstead Borough, which is considerably more than 7.5km away, is not likely to affect Ashdown Forest.

3.6.4 The Ashdown Forest is completely separated from Reigate & Banstead Borough by the M23 motorway, and partially separated by the A22. These traffic arteries provide a barrier to domestic pets such as cats and dogs affecting the bird interest of the site. It could be argued, however, that these major traffic arteries provide for ease of vehicular access to the Forest, adding to the tourism affecting the site.

3.6.5 A tourist survey of the Ashdown Forest carried out by Tourism Southeast Research Services during the summer of 2004 found that, of 218 face-to-face interviews, 72% were day visitors from outside the forest area, reflecting the site’s large visitor catchment. However only 6% came from Surrey, with most visitors (64%) from homes in East Sussex and Kent (see Figure 3.5 below).
Figure 3.5  Origin of visitors to Ashdown Forest


3.6.6 Red triangles in Figure 3.5 above illustrate postcodes of visitors to the Ashdown Forest. The proportion of visitors from Reigate & Banstead borough was very small. The trends identified in the Tourism Southeast survey indicate that new development proposed by Reigate & Banstead Core Strategy, even with the higher number of housing units now proposed, is unlikely to have a significant impact on the Ashdown Forest.

3.6.7 Factors that will alleviate recreational pressure on the Ashdown Forest SAC and SPA are similar to those relating to the Mole Gap to Reigate Escarpment SAC, including:

- Outdoor recreation is well catered for locally in the borough.
- The Council’s PPG17 Open Space Assessment recommends developing new open space in tandem with new housing development to address any remaining deficiencies in local open space provision. The Horley Riverside Green Chain is a current example, creating an extensive area of open space with formal and informal recreational facilities easily available to new and existing local residents.
Proposed avoidance measures

3.6.8 In its letter of 26th June 2007, referring to the Appropriate Assessment of the South East Plan, Natural England reports that the Regional HRA directs local authorities to work together to consider the potential impacts and possible measures to prevent adverse effects on European and international sites as a result of increased recreation. This instruction is reflected in the proposed avoidance measures below.

3.6.9 The following are proposed and provided for within the Core Strategy as appropriate:

- Continue to promote the creation of new open space to accompany new housing development within Reigate & Banstead.
- Consulting Wealden District Council and East Sussex County Council on the Core Strategy, inviting specific opportunity to challenge Reigate & Banstead Borough Council’s response in this Appropriate Assessment.
- Promoting the joint monitoring and management of recreational pressures on European sites.

3.6.10 There are currently no partnership groups that regularly meet that include both Reigate & Banstead and Wealden District Councils. However the Sussex Wildlife Trust now hosts the Gatwick Green Space Partnership, which this Council partnership funds, providing a direct link between this Council and a number of local authorities in Sussex. It is therefore proposed that joint monitoring and management of recreational pressures on European sites could be progressed via the Gatwick Green Space Partnership.

Conclusions

3.6.11 In its letter of 10 April 2008, Natural England agreed with the conclusion that the Core Strategy will not have adverse effects on the Ashdown Forest SAC and SPA.

3.6.12 It was considered that the proposed modifications to the Core Strategy (HRA Assessment dated August 2009) will not alter this assessment, because the spatial distribution will be as originally proposed, and because of the distance between the houses and potential receptors particularly with the inclusion of the above avoidance measures. Natural England supported the proposal to promote joint monitoring and management of recreational pressure on European sites.
England’s letter of 27 July concurs with the Reigate & Banstead assessment that ‘the avoidance measures set out within the AA will ensure the additional housing……will not have significant adverse effect on the …Ashdown Forest SPA/SAC through recreation pressure and air quality’ (Appendix 2).

3.6.13 The Core Strategy now proposes less housing units but with the same spatial distributions. It is considered that the Core Strategy is highly unlikely to cause recreational disturbance at Ashdown Forest SAC and SPA.

3.6.14 It will be most appropriate to assess and monitor recreational pressures at European sites on an ongoing basis, via existing partnerships such as the Gatwick Green Space Partnership and the Surrey Planning Working Group.

3.6.15 Wealden District Council and East Sussex County Council will be consulted on the Core Strategy, inviting specific opportunity to challenge Reigate & Banstead Borough Council’s response to this issue.
3.7 Air quality at Ashdown Forest SAC and SPA

3.7.1 In Section 3.4 of this report, paragraphs relating to primary air pollutants, their effects on terrestrial ecosystems, regional trends and locally generated air pollution are directly relevant to air quality considerations at Ashdown Forest SAC and SPA. For succinctness, however, these paragraphs are not repeated again here.

Locally generated air pollution

3.7.2 The Ashdown Forest SAC and SPA is partly dissected by the A22. Levett-Therivel suggests that declining air quality could become a particular problem at Ashdown Forest because of predicted increases in traffic on the A22. Proposals for a relief road between the A22 and A264 around East Grinstead are predicted to raise traffic levels by up to 20% on the A22 (AA workshops for the South East Plan).

Air pollution effects on the Ashdown Forest SAC and SPA

3.7.3 Key habitats that qualify the Ashdown Forest as being of European importance are listed in Table 2.3.

3.7.4 Table 3.2 shows existing pollution levels for lowland heathland habitats within the Ashdown Forest SAC and SPA. The information focuses on critical load range, deposition and critical load exceedance (these terms are defined within Section 3.4 of this report).

Table 3.2 Existing air pollution at Ashdown Forest SAC and SPA

<table>
<thead>
<tr>
<th>Habitat</th>
<th>Pollutant (&amp; unit of measurement)</th>
<th>Critical load range</th>
<th>Deposition</th>
<th>Ozone exposure</th>
<th>% Critical Load Exceedance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lowland Heathland</td>
<td>Acid deposition (keq/ha/yr)</td>
<td>0.10</td>
<td>1.50</td>
<td>-</td>
<td>1400%</td>
</tr>
<tr>
<td></td>
<td>Nitrogen deposition (kg N/ha/year)</td>
<td>10-20</td>
<td>16.8</td>
<td></td>
<td>Within critical load range</td>
</tr>
<tr>
<td></td>
<td>Ozone (ppb hours)</td>
<td>3000</td>
<td>-</td>
<td>5015</td>
<td>67%</td>
</tr>
</tbody>
</table>

Source: Air Pollution Information System (www.apis.ac.uk)
3.7.5 The following observations from Table 3.2 above relate to existing pollution levels at the Ashdown Forest SAC and SPA. Any additional pollution resulting from new development would effectively add to any existing harmful effects:

- **Acidification**: Acid deposition on lowland heathland habitats exceeds the critical load range by 1400%, indicating harmful indirect effects. APIS suggests that Sulphur driven acid deposition is now playing second place to acid deposition driven by nitrogen. Acid deposition can cause direct damage to heath mosses, liverworts and lichens, which receive their nutrients directly from the atmosphere.

- **Eutrophication**: Nitrogen deposition on lowland heathland habitats is within the critical load range, indicating no harmful indirect effects. However, APIS suggests that today nitrogen deposition is more likely to affect lowland heaths than acid deposition, and it is therefore important to monitor changes in Nitrogen deposition at this site. Should critical load ranges of nitrogen be exceeded, harmful effects can include changes in species composition with a marked decline in heather (Calluna vulgaris) and an increased dominance of grasses – for example, it is estimated that more than 35% of former Dutch heathland has changed into grassland (Bobbink et al., 1993). Such changes in these plant communities have also been linked to disappearance of some butterflies, amphibians and birds (Bobbink et al., 1995; Fangmeier et al., 1994). Effects also include vulnerability to direct damage of mosses, liverworts and lichens; increased attraction to insects, pests, and opening up of the canopy due to frost. Management intervention can reduce impacts of nitrogen through removal via grazing and burning.

- **Ozone exposure** on lowland heathland habitats exceeds the critical load range by 67%, indicating harmful indirect effects. APIS suggests that ground level ozone has the following effects on lowland heathland (which are the same as those of calcareous grassland): visible injury to foliage, reduction in growth rate, selection against ozone sensitive genotypes and changed reaction to water stress.

**Summary assessment**

3.7.6 As stated above, it is likely that the development proposed by Reigate & Banstead’s Core Strategy will make a small contribute to regional air pollution issues but that measures to promote modal transport shift and to address carbon emissions will help lessen this contribution. It is impossible to demonstrate a clear link with air quality levels at the Ashdown Forest SAC and SPA. However, the Ashdown Forest is located
12.5 km from Reigate & Banstead boundaries and is separated from the borough by both the M23 motorway and the A22.

3.7.7 In its letter of 26th June 2007, Natural England suggests that Reigate & Banstead Borough Council should focus on local air pollution impacts:

“When considering the impact of traffic generated air pollution, it is necessary to consider any development allocation, or focus of development that falls within 200m of a European or international site. This will include any additional infrastructure, or upgrading of existing infrastructure, or indeed any allocation that would subsequently lead to such infrastructure development.”

3.7.8 In light of this advice, and the distance of the Ashdown Forest from the borough boundaries, the Council considers that the impact of air pollution caused by the Core Strategy could be discounted.

**Proposed avoidance measures**

3.7.9 Factors that will promote improved regional air quality, that will benefit air quality at the Ashdown Forest SAC and SPA include:

- Ensuring modelling of transport effects of larger developments takes place at the master planning stage to enable potential air pollution impacts to be investigated fully in partnership with neighbouring authorities.
- Continue to promote reduction in a comprehensive modal shift from car to more sustainable forms of transport throughout the borough, including:
  - Design sustainable transport facilities into new development.
  - Create sustainable transport routes and links between existing facilities

**Conclusions**

3.7.10 Conclusions are as follows:

- The relative impact of air pollution at the Ashdown Forest created by the proposals contained in the revised Core Strategy can be discounted.
- Pollution at the Ashdown Forest must be addressed at a regional level. A requirement of larger developments if appropriate at the master planning stage will be to assess the potential impacts.
• Natural England, in their letter of 10 April 2008 agreed with these conclusions presented in the earlier AA.

• It is considered that the air pollution impacts on Ashdown Forest associated with the ‘Suggested Amendments proposed for the Inspector’ can be discounted because of the distance and the spatial distribution of the houses.
3.8 **Policy by Policy Assessment of Core Strategy**

3.8.1 Reigate & Banstead BC carried out a policy-by-policy AA analysis of the impacts of the Core Strategy. This was reported in the AA which accompanied the Core Strategy submitted in March 2009. The analysis covered the key issues identified during the AA, namely the potential recreational impact and potential reduction in air quality resulting from the Core Strategy. The Council identified the key features of each policy and whether each of the policies is likely to affect recreational disturbance and air quality, the two pathways through which the SAC could be affected. The policy-by-policy approach focused on possible impacts at the Mole Gap to Reigate Escarpment SAC. Relevant policies were then also considered in relation to possible recreational and air quality impacts at Ashdown Forest SAC/SPA which lies some 12.5 km outside the Boundary of Reigate & Banstead Borough Council.

3.8.2 The policy-by-policy AA analysis demonstrates that the individual policies will not adversely affect the SAC. Where potential adverse impacts existed, these have been avoided through carefully considered avoidance measures, which are detailed in the main report. The approach provided a useful input into the overall AA process and shaping of the Core Strategy. It was particularly helpful in identifying where any potential effects can arise and therefore assisting in the development of suitable focused avoidance measures which have now been incorporated into the development of the Core Strategy policies. The avoidance measures are identified in the policy-by-policy AA analysis.

3.8.3 The Council’s ‘Suggested Amendments proposed for the Inspector’ for the Core Strategy were subsequently also examined using the policy-by-policy approach (AA of August 2009). No policy changes were proposed; the changes related only to minor wording changes. Therefore it was considered that the suggested amendments to the Core Strategy do not affect the policy-by-policy analysis.

3.8.4 The Council has reviewed the policy-by-policy assessment for the revised Core Strategy (March 2012). Minor changes have been made to a number of policies. Policies CS4 and CS5 (Strategic Locations for Growth; Allocation of Development) have been merged. Policies CS16 and CS17 (Travel Options; Accessibility) have been merged into a new policy CS15 (Travel options and accessibility). CS18 (Parking) is removed. The changes are in Table 3.3. The revised analysis of the policy-by-policy approach is presented in Table 3.4.
Table 3.3: Changes in Core Strategy Policies

<table>
<thead>
<tr>
<th>Policy Number</th>
<th>Title</th>
<th>Changes of relevance to the HRA Assessment</th>
</tr>
</thead>
</table>
| CS1           | Valued Landscapes and the Natural Environment        | Restructured for clarity, with specific points as follows: Removal of the 800m buffer with Natural England agreement, replacement with statement on the requirement for HRAs.  
|               |                                                      | • Minor updating to the wording of the avoidance measures.  
|               |                                                      | • Insertion of explicit reference to biodiversity  
|               |                                                      | • Revised bullet point on Green Belt  
|               |                                                      | • Increased focus on the Green Infrastructure as the delivery mechanism for measures to avoid potential impact on the SAC  
|               |                                                      | • Reference to the Infrastructure Delivery Plan for delivering infrastructure including Green Infrastructure which supports new development for which there is evidence of effect. |
| Policy CS2    | Valued Townscapes                                    | Additional bullet point and supporting text added on heritage and the historic environment.                                                                                                                                                   |
| Policy CS3    | Valued People                                        | Part 1 of policy revised and strengthened in relation to economic development                                                                                                                                                               |
| CS 4          | Allocation of Land for Development                   | • Merged CS4 and 5.  
|               |                                                      | • Policy restructured with phasing of housing, (reflecting the revised approach to delivering the spatial strategy) and with clarity on the possible need for sustainable urban extensions from 2022.                                |
| CS6           | Area 1 to 3                                          | Updated to reflect the latest SHLAA information, economic and retail evidence and Infrastructure Delivery Plan.                                                                                                                         |
| CS8           | Sustainable Development                              | • Some restructuring of policy, for clarity.  
|               |                                                      | • Insertion of reference to pollution  
|               |                                                      | • Slightly strengthened on the social aspects of sustainable development.                                                                                                                                                                |
| CS9           | Sustainable Construction                             | • New policy wording reflecting latest building regulations  
|               |                                                      | • Supersedes SE Plan policy on 10% renewables.                                                                                                                                                                                           |
| CS10          | Infrastructure                                       | Slight clarification in relation to community infrastructure references.                                                                                                                                                                    |
| CS11          | Housing Delivery                                     | Updated in relation to housing numbers.                                                                                                                                                                                                   |
| CS12          | Housing Needs                                        | Minor amendments for clarity.                                                                                                                                                                                                            |
| CS13          | Affordable Housing                                   | Minor updating                                                                                                                                                                                                                           |
| CS15          | Travel options and accessibility                     | Policies on travel and accessibility and parking merged. Policy restructured for clarity.                                                                                                                                                  |
### Table 3.4  Policy by Policy Assessment

<table>
<thead>
<tr>
<th>The policy approach: the key feature of the policy which could potentially be a source of impact</th>
<th>Does the policy approach affect recreational disturbance and air quality at the Natura 2000 Sites?</th>
<th>Mitigation required?</th>
</tr>
</thead>
</table>
| **SPATIAL STRATEGY**  
**CS1 VALUED LANDSCAPES AND NATURAL ENVIRONMENT**  
Development should protect and enhance the green fabric, which includes areas of landscape and biodiversity importance.  
The Mole Valley to Reigate Escarpment SAC will be protected through implementation of a series of avoidance measures delivered through the Green Infrastructure Strategy. Capital projects will be included, within the Infrastructure Delivery Plan where there is evidence that they are needed to support new housing development.  
The AONB will be protected in accordance with National Policy. AGLV will remain as a buffer for the Surrey Hills AONB. The AGLV is identified in Policy CS1 as part of the Green Fabric which the policy seeks to protect. | Increase recreational disturbance?  
The SAC is already well protected from development, as it is located in a remote location on the top of the North Downs, it topography and the existing land uses surrounding it.  
In planning terms, there is a strong presumption against development within or surrounding it, due to the designations as Metropolitan Green Belt, Area of Outstanding Natural Beauty and Regionally Important Geological Sites. The Core Strategy recognizes these existing constraints and designations and proposes the protection of the green fabric of the borough, including this area, as a comprehensive strategic policy. This will be delivered through a Green Infrastructure Strategy. Where appropriate, more detailed policies will be developed in the Development Management Policies (DMP) DPD. This protection of the green fabric as a strategic approach for the borough should avoid the impact of development on the SAC. This strategic policy directs development to locations away from the green fabric. Additionally, the Mole Gap to Reigate Escarpment is located within the AONB which is covered by a Management Plan which guides its future management and enhancement. | None needed due to avoidance measures incorporated into the Policy. |
<table>
<thead>
<tr>
<th>The policy approach: the key feature of the policy which could potentially be a source of impact</th>
<th>Does the policy approach affect recreational disturbance and air quality at the Natura 2000 Sites?</th>
<th>Mitigation required?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bat priority habitats will be protected as part of the policy commitment to protect wildlife corridors and habitats of biodiversity value.</td>
<td>With regards to bio-diversity, the avoidance measures identified in the AA and highlighted in CS1 and 10 will avoid the increase in recreational disturbance at the SAC as a result of development. Through the existing planning application process, any development within an area with the potential to have bat habitats is assessed and referred to Surrey Wildlife Trust for comment and for their recommendation of appropriate measures to address any effects on their habitats. This policy will also contribute to avoiding impacts on the Bechstein bat, a European Protected Species present on the SAC and surrounding area, as identified earlier in the AA through retention of bat priority habitats (including hedgerows and ancient woodlands). CS10 of the Core Strategy and more detailed subsequent policies in the DMP DPD will address the need to clarify and protect this area. The strategic policy in the Core Strategy will enable the GI strategy to deliver the mechanisms to avoid adverse effects of development on the SAC Existing saved policies will in the interim address any development proposed until more detailed LDF policies are adopted. The policy contributes to the enhancement of biodiversity across the borough through the retention of other important local habitats such as watercourses, and contributes to the implementation of the GI strategy.</td>
<td>None needed due to avoidance measures incorporated into the Policy.</td>
</tr>
<tr>
<td></td>
<td>Increase recreational disturbance?</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Reduce air quality?</td>
<td>This policy will not reduce air quality as no significant development will occur in the SAC or within close enough proximity to have an effect on the SAC. This policy approach could potentially benefit air quality as it will enhance and protect landscape areas and the SAC. Any development will be required to ensure that any potential air pollution effects on the SAC are addressed.</td>
</tr>
<tr>
<td>The policy approach: the key feature of the policy which could potentially be a source of impact</td>
<td>Does the policy approach affect recreational disturbance and air quality at the Natura 2000 Sites?</td>
<td>Mitigation required?</td>
</tr>
<tr>
<td>---</td>
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</tr>
<tr>
<td><strong>CS2 VALUED TOWNSCAPES</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Development will respect, maintain and protect the character of the townscape of the borough and incorporate environmentally responsible design and construction practices (including green space, biodiversity etc). Development will be required to minimise its impact on the surrounding environment and to protect and enhance existing areas of biodiversity value.</td>
<td>Does the policy approach affect recreational disturbance and air quality at the Natura 2000 Sites?</td>
<td>Mitigation required?</td>
</tr>
<tr>
<td>Increase recreational disturbance?</td>
<td>The Policy will not increase recreational disturbance at the Natura 2000 sites.</td>
<td>None required</td>
</tr>
<tr>
<td>Reduce air quality?</td>
<td>The approach has no identified impact. However as a generic policy about development, when applied alongside the requirements of CS1, it will ensure that any development avoids adverse effects on the SAC.</td>
<td>None required</td>
</tr>
<tr>
<td><strong>CS3 VALUED PEOPLE</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sustainable economic growth will be promoted and supported throughout the borough. Policies are provided on improving selected Regeneration Areas, improving infrastructure; promoting the Gatwick Diamond, supporting existing businesses and identifying sites to meet office and industrial needs.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Increase recreational disturbance?</td>
<td>It is not considered that economic growth in general will increase recreational disturbance at the SAC because of the avoidance measures incorporated into CS1.</td>
<td>None needed because of avoidance measures in CS1 and CS10.</td>
</tr>
<tr>
<td>Reduce air quality?</td>
<td>There is the potential for employment related development and this could potentially reduce air quality in the immediate surroundings. However there are no existing or designated employment sites proposed in or within proximity to the SAC. Any further development in this area would require planning permission and will be considered against CS1. Therefore it is not considered that the implementation of this policy would cause adverse effects on the SAC.</td>
<td>None needed because of avoidance measures in CS1</td>
</tr>
<tr>
<td><strong>The policy approach: the key feature of the policy which could potentially be a source of impact</strong></td>
<td><strong>Does the policy approach affect recreational disturbance and air quality at the Natura 2000 Sites?</strong></td>
<td><strong>Mitigation required?</strong></td>
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<tr>
<td><strong>CS4 STRATEGIC LOCATIONS FOR GROWTH</strong></td>
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<tr>
<td>Significant development and regeneration will be directed towards the existing built up areas of the borough. Specifically this includes Preston regeneration area, Banstead village, Redhill Town centre and surrounding urban area, Merstham regeneration area, Reigate urban area, Horley town centre and urban area. To meet the housing target, projected employment demands and retail needs, the Council will identify, assess and allocate appropriate sites for future development in a sequence. The Core Strategy outlines that beyond 2022, there may be a need for sustainable urban extensions into the Green Belt.</td>
<td>Increase recreation disturbance? It is not considered that this approach will increase recreational disturbance at the SAC because of the avoidance measures incorporated into CS1. It is considered that the search criteria included in CS4 will further contribute to the avoidance of adverse effects through the Plan period. Reduce air quality? This strategic approach should not lead to a reduction in air quality within close enough proximity to the SAC to cause an adverse effect on the SAC because of the avoidance measures in CS1. NE advice is that with respect to air quality impacts, it is necessary to consider any development allocation or focus of development that falls within 200m of a European site. In addition to the avoidance measures in CS1, integral to this policy are measures in the Core Strategy, Local Transport Plan and other plans and policies in neighbouring authorities, to promote a modal shift from car use to more sustainable transport options. Promoting development in the most sustainable locations will increase travel opportunities available and help to minimise the use of the car. Large emission generating industries will be assessed on an individual and site-specific basis.</td>
<td>None needed because of the avoidance measures incorporated into CS1 and CS4.</td>
</tr>
<tr>
<td><strong>CS 5 TOWN AND LOCAL CENTRES</strong></td>
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<tr>
<td>The policy approach is to retain a multi-purpose role of regional, town and local centres. This will be retained and improved through the provision of the majority of retail, social, community, housing and leisure uses in these centres at a scale appropriate to their role.</td>
<td>Increase recreational disturbance? It is considered that this policy would not have adverse effects on the SAC because of the avoidance measures incorporated into CS1. Reduce air quality? This strategic approach should not lead to a reduction in air quality within close enough proximity to the SAC to cause an adverse effect on the SAC because of the avoidance measures in CS1.</td>
<td>None</td>
</tr>
<tr>
<td>The policy approach: the key feature of the policy which could potentially be a source of impact</td>
<td>Does the policy approach affect recreational disturbance and air quality at the Natura 2000 Sites?</td>
<td>Mitigation required?</td>
</tr>
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<tr>
<td>CS6 (1): Area 1: North Downs Banstead Area</td>
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<tr>
<td>The policy covers a mix of housing units as part of regeneration at Preston, together with small scale employment allocations. No significant new employment allocations or retail in this part of the borough. No significant expansion is planned for the built-up area of Banstead.</td>
<td>Increase recreational disturbance?</td>
<td>None needed because of the avoidance measures incorporated into CS1 and 10.</td>
</tr>
<tr>
<td></td>
<td>As the development covered by this policy will be beyond the distance most people walk to open space, from the SAC, it is not considered that the policy will have an adverse effect on recreational disturbance at the SAC.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Reduce air quality?</td>
<td>None required</td>
</tr>
<tr>
<td></td>
<td>Natural England advice is that with respect to air quality impacts it is necessary to consider any development allocation or focus of development that falls within 200m of a European site. As the homes will be over 200m from the SAC this strategic approach should not lead to a reduction in air quality within close enough proximity to the SAC to cause an adverse effect on the SAC.</td>
<td></td>
</tr>
<tr>
<td>The policy approach: the key feature of the policy which could potentially be a source of impact</td>
<td>Does the policy approach affect recreational disturbance and air quality at the Natura 2000 Sites?</td>
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<tr>
<td><strong>CS6 (2A): AREA 2A WEALDEN GREENSAND RIDGE: REDHILL BUILT-UP AREA</strong></td>
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<tr>
<td>Redhill is identified as a regional transport hub and centre for significant change in the emerging regional spatial strategy.</td>
<td>Increase recreational disturbance?</td>
<td>None needed because of the avoidance measures incorporated into CS1 and CS10.</td>
</tr>
<tr>
<td>The policy is to regenerate the town centre to reflect its primary centre status and to take advantage of its excellent transport links.</td>
<td>The outskirts of Redhill lie within 800m of the Mole Gap to Reigate Escarpment SAC which is the distance most people tend to walk. However it is considered that the policy would not cause adverse recreational impacts on the SAC because of the avoidance measures incorporated into CS1. In addition, honeypot locations are already well managed. The Core Strategy proposes the strategic protection and enhancement of Green Infrastructure within the town and links to the wider Green Network. This strategy will encourage residents to use appropriate alternative sites whilst preserving the SAC. It is not possible to predict the effects of any sustainable extensions on recreational impacts at the SAC at this time. However search criteria for these sites, identified in CS4, will safeguard the SAC. In addition, housing, industry and other developments will be subject to HRA in particular to the assessment of recreational impacts. NE advice is that with respect to air quality impacts, it is necessary to consider any development allocation or focus of development that falls within 200m of a European site. No associated new roads within 200m of the SAC are planned and this policy is being developed hand in hand with the local transport plan, which encourages a modal shift as a major focus. There will also be a presumption against development within 200m of the SAC. Large emission generating industries would be assessed on an individual and site-specific basis. Therefore it is considered that air quality impacts at the SAC due to development at Redhill will be minimal.</td>
<td></td>
</tr>
<tr>
<td>Development will include housing, employment space, retail and regeneration. The Policy states that after 2011, the Council may need to find additional sites for housing adjoining the urban area</td>
<td>Reduce air quality?</td>
<td>It is not possible to predict the effects of any sustainable urban extensions on air quality at the SAC at this time however the search criteria in CS4 specifically avoid the SAC. Housing, industry and other developments will be subject to HRA assessment of air quality impacts.</td>
</tr>
<tr>
<td>The policy approach: the key feature of the policy which could potentially be a source of impact</td>
<td>Does the policy approach affect recreational disturbance and air quality at the Natura 2000 Sites?</td>
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<tr>
<td></td>
<td>There is the potential for development proposals in the town to lead to a reduction in air quality as a result of additional homes, traffic, employment opportunities and industrial/infrastructure development. Any impact will depend on the nature of the development and its location. As there are no areas for strategic development in close proximity to the SAC no potential effects are envisaged.</td>
<td>None needed because of the avoidance measures incorporated into CS1.</td>
</tr>
<tr>
<td><strong>CS6 (2B): AREA 2B: WEALDEN GREENSAND RIDGE: REIGATE AND REMAINING OF AREA 2</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The development of Reigate focuses on a combination of housing infill, and some intensification of existing employment areas. The Council will undertake a Green Belt review of the borough as part the Development Management and Site Allocation DPD process.</td>
<td>Increase recreational disturbance</td>
<td>None needed because of the avoidance measures incorporated into CS1 and CS10.</td>
</tr>
<tr>
<td></td>
<td>Due to the proximity of the outskirts of Reigate to the SAC, there is a potential for increased recreational disturbance on the SAC as a result of new infill housing development. However it is considered that the impact is avoided through the avoidance measures provided in CS1.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Reduce air quality?</td>
<td>This strategic approach should not lead to a reduction in air quality within close enough proximity to the SAC to cause an adverse effect on the SAC because of the avoidance measures in CS1.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Natural England advice is that with respect to air quality impacts it is necessary to consider any development allocation or focus of development that falls within 200m of a European site. No new roads or new businesses are planned within 200m of the SAC.</td>
</tr>
<tr>
<td>The policy approach: the key feature of the policy which could potentially be a source of impact</td>
<td>Does the policy approach affect recreational disturbance and air quality at the Natura 2000 Sites?</td>
<td>Mitigation required?</td>
</tr>
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</tr>
</tbody>
</table>
| **CS6 (3): AREA 3: LOW WEALD: HORLEY**  
The policy in Horley covers new housing developments in the NE and NW sectors of the town, and in the town centre. Integrated with the new infrastructure is a programme of Green Infrastructure around the town, and investigation of opportunities to extend and link the Riverside Green Chain to the wider GI network.  
Increase recreational disturbance?  
Increased number of homes and other development in Horley and surroundings will potentially lead to an increase in recreational disturbance at the Mole Gap to Reigate Escarpment SAC. However it is considered that this policy will not cause adverse effects on the SAC for the following reasons: i) because of the distance from the site and ii) because of the enhanced Green Infrastructure within the town (through the provision of new recreation space as part of the new developments including the Riverside Green Chain and a new town park). The latter will encourage existing and new residents to use these new and alternative linked sites.  
As the AA demonstrates, 800m is the distance most people walk to open space and as these facilities will be located within this distance in these development areas, the new recreation areas will be used for the majority of recreational trips.  
Reduce air quality?  
The development provided by the policy is a considerable distance from the SAC. This strategic approach should not lead to a reduction in air quality within close enough proximity to the SAC to cause an adverse effect on the SAC. | None needed because of the avoidance measures incorporated into CS10. |
| **CS 7 GATWICK AIRPORT**  
The policy directs the Council to work with partners to promote the Gatwick Diamond and support the development of Gatwick Airport within the Gatwick Airport boundary.  
Increase recreational disturbance?  
It is not considered that the expansion of Gatwick will cause increase in recreational pressure on the SAC given that it is located over 10 Km from the SAC. Gatwick Airport is not within the borough boundary so we have no statutory control over the airport. This was assessed though the AA for Crawley Borough Councils Core Strategy.  
Reduce air quality?  
Natural England advice is that with respect to air quality impacts it is necessary to consider any development allocation or focus of development that falls within 200m of a European site.  
As Gatwick is over 10 km from the SAC and outside the jurisdiction of Reigate & Banstead, however this strategic approach should not lead to a reduction in air quality within close enough proximity to the SAC to cause an adverse effect on the SAC. | None required |
<table>
<thead>
<tr>
<th>CROSS CUTTING POLICIES</th>
<th>Does the policy approach affect recreational disturbance and air quality at the Natura 2000 Sites?</th>
<th>Mitigation required?</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>CS8 SUSTAINABLE DEVELOPMENT</strong></td>
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<tr>
<td>Sustainability will be designed into development proposals. All proposals will need to meet specific criteria with respect to sustainable development.</td>
<td>Increase recreation disturbance?</td>
<td>None required</td>
</tr>
<tr>
<td>This policy will have no direct implications for recreational disturbance at the SAC.</td>
<td></td>
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<tr>
<td>This policy will promote the preferential use of previously developed land within the built up areas, and encourage the maintenance, enhancement and development of features which will contribute to the Green Infrastructure network of the borough. This policy, together with avoidance measures in CS1 will help avoid recreational impact on the SAC.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Reduce air quality?</td>
<td>No impacts</td>
<td>None required</td>
</tr>
<tr>
<td>This policy will encourage development designs to contribute towards a reduction in carbon emissions, to minimize the need to travel, and to increase opportunities for non-car travel, therefore potentially contributing to a reduction in air emissions.</td>
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</tbody>
</table>

| **CS9 SUSTAINABLE CONSTRUCTION** | | |
| All developments will be required to incorporate sustainable construction features to reduce the consumption of natural resources, to help deliver the Sustainable Community Plan’s aims to promote zero and low carbon development and bring about environmental improvements in existing buildings. | Increase recreation disturbance? | No impacts |
| Reduce air quality? | This policy will not reduce air quality at the SAC. | None required |
| These proposals should contribute to a reduction in the use of energy, and the increase in more sustainable forms of energy production. The policy will contribute to regional efforts to reduce the trend of increased air pollution. | | |

| **CS10 INFRASTRUCTURE DELIVERY** | | |
| Contributions will be secured from new developments towards infrastructure, including Green Infrastructure, required to meet new development and towards avoiding effects of development. | Increase recreation disturbance? | Appropriate contributions will be channelled towards avoidance of impact on the SAC. Full details will be included in the Infrastructure Delivery Plan and the Green Infrastructure Strategy. | None required |
| Reduce air quality? | No impacts | | |

Reigate & Banstead Borough Council
Core Strategy

Revised Appropriate Assessment
February 2012
### The policy approach: the key feature of the policy which could potentially be a source of impact

<table>
<thead>
<tr>
<th>Does the policy approach affect recreational disturbance and air quality at the Natura 2000 Sites?</th>
<th>Mitigation required?</th>
</tr>
</thead>
</table>

#### CS11 HOUSING DELIVERY

The council plans for 6,900 homes within the period 2012 to 2027

| Increase recreation disturbance? | Potential disturbance will be dependent on the location and type of development. Developments in close proximity to the SAC could potentially cause localised recreational impacts at honeypot sites, which are already well managed. Proposed avoidance measures are included in this AA. It is considered that this policy will not have adverse effects on the SAC because of the avoidance measures incorporated into CS1. Developments at a distance are unlikely to have impact on the SAC, and because many such developments have associated GI improvements, may possibly help to reduce impact at the SACs. | None needed because of the avoidance measures incorporated into CS1, 4 and 10. |

| Reduce air quality? | Natural England advice is that with respect to air quality impacts it is necessary to consider any development allocation or focus of development that falls within 200m of a European site. This strategic approach should not lead to a reduction in air quality within close enough proximity to the SAC to cause an adverse effect on the SAC because of the avoidance measures in CS1. | None needed because of the avoidance measures incorporated into CS1. |

#### CS12 HOUSING NEEDS OF THE COMMUNITY

This policy will deliver a mix of housing types to meet the needs of all households in the borough

| Increase recreation disturbance? | No impacts as a result of the policy mix. The impacts depend on nature of the development and location. | None required |

<p>| Reduce air quality? | No impacts as a result of the mix. The impacts depend on nature of the development and location. | None required |</p>
<table>
<thead>
<tr>
<th>The policy approach: the key feature of the policy which could potentially be a source of impact</th>
<th>Does the policy approach affect recreational disturbance and air quality at the Natura 2000 Sites?</th>
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<tbody>
<tr>
<td><strong>CS3 AFFORDABLE HOUSING</strong></td>
<td></td>
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</tr>
<tr>
<td>Affordable housing will be required as part of new housing developments</td>
<td>Increase recreation disturbance?</td>
<td>Affordable housing does not in general cause an increase in recreational disturbance. Recreational effects on the SAC due to housing in proximity to the SAC will be avoided through the avoidance measures in CS1.</td>
</tr>
<tr>
<td></td>
<td>Reduce air quality?</td>
<td>No impact identified.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>None required</td>
</tr>
<tr>
<td><strong>CS14 GYPSIES AND TRAVELLERS</strong></td>
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<tr>
<td>This policy includes for provision to be made for the number of pitches specified in the RSS. Pitches will be allocated in accordance with criteria.</td>
<td>Increase recreation disturbance?</td>
<td>With a presumption against the development of Gypsy and Traveller sites within the Green Belt, the avoidance measures in CS1, and with the modest number of pitches to be allocated, it is considered that this policy will have no adverse impact on the SAC.</td>
</tr>
<tr>
<td></td>
<td>Reduce air quality?</td>
<td>None required</td>
</tr>
<tr>
<td><strong>CS15 TRAVEL AND ACCESSIBILITY</strong></td>
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<tr>
<td>The policy will deliver enhanced provision and promotion of alternatives to the car. The policy includes travel plans for new developments. The policy will direct development to accessible locations within the borough.</td>
<td>Increase recreation disturbance?</td>
<td>It is considered that this policy will not cause increased recreational impacts on the SAC.</td>
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<td></td>
<td></td>
<td>The increased provision of walking, cycling and bridleways will be part of an integrated strategy for increasing GI provision across the borough, for reasons of improving alternatives to car, for fitness, for bio-diversity. It will have the effect of increasing provision in some areas for recreation, therefore contributing to a reduction in the recreational pressure on the SACs.</td>
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<tr>
<td></td>
<td></td>
<td>Development will be directed to areas which are most accessible, and this will be away from areas covered by the SAC. Whilst development may lead to more cars on the road, no new roads are planned close to the SAC and therefore it will not become more accessible.</td>
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<tr>
<td></td>
<td></td>
<td>None required</td>
</tr>
<tr>
<td>The policy approach: the key feature of the policy which could potentially be a source of impact</td>
<td>Does the policy approach affect recreational disturbance and air quality at the Natura 2000 Sites?</td>
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<tr>
<td>Reduce air quality?</td>
<td>It is considered that this policy will not cause reduction in air quality at the SAC. Travel plans which reduce the impact of new developments on the road network and will, in combination with other policies, help reverse the regional trend in air pollution. No new roads are planned within 200m of the SAC; therefore these areas will not become more accessible and will not be favoured for development.</td>
<td>None required</td>
</tr>
<tr>
<td>Ashdown Forest SAC/SPA</td>
<td>It is considered that the proposals contained in the Core Strategy will not cause additional recreational disturbance at Ashdown Forest SAC and SPA, particularly with the inclusion of the proposed avoidance measures. Natural England agreed with the conclusion in its letter of 10 April 2008, that The Core Strategy will not have adverse effect on the Ashdown Forest SAC and SPA.</td>
<td>None required</td>
</tr>
<tr>
<td>CS 6 Horley</td>
<td>Increase recreation disturbance?</td>
<td>None required</td>
</tr>
<tr>
<td>Reduce air quality?</td>
<td>It is concluded that the relative impact of air pollution at the Ashdown Forest created by the proposals contained in the Core Strategy can be discounted. Pollution at the Ashdown Forest must be addressed at a regional level. A requirement of larger developments if appropriate at the master planning stage will be to assess the potential impacts. Natural England, (letter 10 April 2008) agreed with these conclusions presented in the earlier AA.</td>
<td>None required</td>
</tr>
<tr>
<td>CS8 Gatwick</td>
<td></td>
<td>None required</td>
</tr>
<tr>
<td></td>
<td>It is possible that development in Reigate &amp; Banstead BC, related to Gatwick Airport could potentially have effect on Ashdown Forest SAC/SPA. There is insufficient information as yet to examine any effects of development in the borough related to Gatwick on Ashdown Forest. It is noted that both Gatwick Airport and Ashdown Forest are outside the boundaries and control of Reigate &amp; Banstead Borough Council.</td>
<td>None required</td>
</tr>
</tbody>
</table>
4 OVERALL CONCLUSIONS OF THE APPROPRIATE ASSESSMENT

4.1 As a result of the Appropriate Assessment it is concluded that the Core Strategy of March 2012, alone and in combination with other plans and projects, will have no adverse impact on the integrity of the Natura 2000 Sites as protected by the European Habitats Directive. In summary:

- Recreational pressure created by the proposals contained within the Core Strategy and in combination with other current Plans will be minimal. It is considered that no significant adverse impact will result on the integrity of the SACs as a result of the revised Core Strategy.

- Measures to avoid adverse effects on the Special Area of Conservation will be delivered through the Green Infrastructure Strategy. Within the overall LDF monitoring programme, the Council will promote the monitoring of impacts on the SAC and the effectiveness of measures proposed within the Appropriate Assessment to avoid impacts. The Council is also able to monitor the implementation of Core Strategy policies through monitoring of Development Control applications. In addition, the Council is required to monitor 'Improved Local Biodiversity' along with requirements for monitoring the condition of SSSI's, as National Indicators.

- Air pollution created by the proposals contained in the Core Strategy will be minimal. It is therefore considered that the Core Strategy will not have an adverse impact on the integrity of the Mole Gap to Reigate Escarpment SAC. It is considered that the Core Strategy will not have adverse impacts on the Ashdown Forest SAC/SPA because of the distance involved and with the proposed avoidance measures.

- Through policies contained within the Core Strategy on Infrastructure Provision, biodiversity, design and landscaping, development should result in a net gain in biodiversity value and not result in harm to bats or other species.

- Climate change is considered to be a global issue. The policies in the Core strategy will result in a reduction in the growth in greenhouse gases, but this in itself will not have a significant impact on the environment. Only in combination with the efforts of others will a change be seen.

- The effects of urbanisation are difficult to control directly through the Core Strategy but may be controlled, to some extent, through the policies designed to avoid the impacts associated with recreational use of the site, through HRA assessment of housing proposals, and through the
implementation of search criteria within the policies, in identifying any sustainable urban extensions in the later stage of the Plan period.

4.2 Appropriate Assessment may be required in order to prepare other plans as part of the LDF.

4.3 Natural England, in their letter of 15 February 2012 referring to the draft of this report, stated that it was ‘satisfied with the approach taken on the revised Habitats Regulations Assessment screening, taking into account the now lower proposed housing allocation of 6,900 units.’ Natural England also stated that ‘Given the housing allocation is the most significant modification in the revised Core Strategy in relation to the Habitats Regulations Assessment, and the spatial distribution of housing remains unaltered, Natural England is satisfied this does not present any significant change in potential impacts of the CS on European sites compared to the earlier versions of the Core Strategy and HRA.’ Natural England was able to maintain their ‘concurrence with the conclusions made in the revised AA of no likely significant effect of the Core Strategy on European Sites (Appendix 2).
APPENDICES
**Appendix 1: The Impact of the Reigate & Banstead Core Strategy: Interactions**

**Screened out of the Appropriate Assessment**

<table>
<thead>
<tr>
<th>Reason for designation / key characteristics</th>
<th>Vulnerability</th>
<th>Possible impacts arising from Core Strategy</th>
<th>Possible 'in combination' impacts from other trends, plans etc</th>
<th>Risk of significant 'in combination' effects?</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>MOLE GAP TO REIGATE ESCARPMENT SAC</strong></td>
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<tr>
<td>Presence of Great Crested Newts <em>Triturus cristatus</em></td>
<td>There is a need to ensure that great crested newt ponds and foraging areas are maintained. (Ponds located on Headley Heath).</td>
<td>The newt habitats at Headley are outside the Reigate &amp; Banstead Boundary and will therefore not be directly affected by any of the Council’s development plans. Investigations by Reigate &amp; Banstead have determined that the water sources for the SAC is located north of Reigate and Redhill away from the main areas of development, and away from the newt habitats and therefore are very unlikely to have any adverse effects on the water supply to their habitat. Reigate &amp; Banstead Council considers that there may be a very limited impact from development, water abstraction and mineral workings in the districts and London borough to the north of the site. The Core Strategy will have no direct impact or influence on this.</td>
<td>None</td>
<td>None</td>
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</table>

The AA of the SE Plan then concluded that it is unlikely that this species will be adversely affected by development proposals.
<table>
<thead>
<tr>
<th>Reason for designation / key characteristics</th>
<th>Vulnerability</th>
<th>Possible impacts arising from Core Strategy</th>
<th>Possible 'in combination' impacts from other trends, plans etc</th>
<th>Risk of significant 'in combination' effects?</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>ASHDOWN FOREST SAC AND SPA</strong></td>
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<tr>
<td>The SAC: One of the most extensive areas of</td>
<td>Vulnerable to</td>
<td>None</td>
<td>None</td>
<td>No</td>
</tr>
<tr>
<td>heathland in southeast England. In particular:</td>
<td>invasion of invasive / non native species such as scrub and bracken (a threat to the SAC) and rhododendron.</td>
<td>The Ashdown Forest SAC and SPA lie approximately 12.5 km from the borough (and 15 km by road) and 20 km from the nearest focus of housing, in Horley. Therefore any increase in visitors as a result of development is considered to be insignificant especially as here are large areas of open space that cater for these activities closer to the residents of the borough and because R&amp;B are currently developing the Riverside Green Chain around Horley.</td>
<td>None</td>
<td>No</td>
</tr>
<tr>
<td>One of best areas in UK for: Northern Atlantic wet heaths with cross-leaved heath <em>Erica tetralix</em>; European dry heaths, significant presence of: Great Crested Newt <em>Triturus cristatus</em>.</td>
<td>Maintenance of great crested newt ponds and foraging areas. Prevention of long-term drying out of the site, due to borehole extraction and transpiration from increase in vegetation cover.</td>
<td>The developments at Horley lie some 20 km from the site and so will not directly impact on it. In addition, Reigate &amp; Banstead’s proposals will not result in abstractions upstream of the Sites.</td>
<td>None</td>
<td>No</td>
</tr>
<tr>
<td>The SPA: During the breeding season the area regularly supports nationally important breeding populations of: Nightjar <em>Caprimulgus europaeus</em> (1% of the GB breeding population); Dartford Warbler <em>Sylvia undata</em> (1.3% of the GB breeding population).</td>
<td>None</td>
<td>None</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>THAMES BASIN HEATHS</strong></td>
<td></td>
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</tr>
<tr>
<td>During the breeding season the area regularly</td>
<td>Birds are vulnerable to recreational disturbance.</td>
<td>None</td>
<td>None</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>The site is approximately</td>
<td></td>
</tr>
<tr>
<td>Reason for designation / key characteristics</td>
<td>Vulnerability</td>
<td>Possible impacts arising from Core Strategy</td>
<td>Possible 'in combination impacts from other trends, plans etc</td>
<td>Risk of significant 'in combination' effects?</td>
</tr>
<tr>
<td>---------------------------------------------</td>
<td>---------------</td>
<td>---------------------------------------------</td>
<td>-------------------------------------------------------------</td>
<td>---------------------------------------------</td>
</tr>
<tr>
<td>supports:- 7.8% of the GB breeding population of Nightjar - 9.9% of the GB breeding population of Woodlark - 27.8% of the GB breeding population of Dartford Warbler</td>
<td>The area is dependent on active heath land management; this is implemented through schemes such as the Countryside Stewardship and Wildlife Enhancement Scheme. Development pressure on neighbouring land and the resulting indirect effects pose a potential long-term problem. A significant area of the land is public open space and is heavily used for informal recreation</td>
<td>14 km from the borough (and 17km by road), and at a considerable distance from Reigate &amp; Banstead’s focus of development at Redhill and Horley. Therefore any increase in visitors as a result of development is considered to be insignificant especially as there are large areas of open space that cater for these activities closer to the residents of the borough.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**SOUTH WEST LONDON WATER BODIES**

Over winter the area regularly supports Shoveler Duck and Gadwall Duck.

It is designated as a Ramsar Site and also supports nationally important populations of Black-necked Grebe, Smew, Great Crested Grebe, Great

Birds are vulnerable to recreational disturbance during winter months. The future management of reservoirs (once they are no longer in use) and requirements for maintenance are ongoing issues. In addition there is pressure from development in urban areas. Disturbance from

None. The site is approx 14.5 km from the borough (and about 20 km by road); therefore any increase in visitors as a result of development is considered to be insignificant, particularly as there are large areas of open space that cater for these activities closer to the residents of the borough. | None | No |
<table>
<thead>
<tr>
<th>Reason for designation / key characteristics</th>
<th>Vulnerability</th>
<th>Possible impacts arising from Core Strategy</th>
<th>Possible 'in combination' impacts from other trends, plans etc</th>
<th>Risk of significant 'in combination' effects?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cormorant and Tufted Ducks</td>
<td>recreational activities needs to be monitored to determine effects</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>RICHMOND PARK SAC AND WIMBLEDON COMMON</td>
<td>The sites are surrounded by urban areas and therefore experiences high levels of recreational pressure.</td>
<td>None. The sites are approx 13km from the borough (approx 15km by road). Further, Reigate &amp; Banstead’s development will be manly focused in Horley, with some in Redhill which are 26 and 30 km away respectively. Therefore any increase in visitors as a result of development is considered to be insignificant. There are large areas of open space that cater for these activities closer to the residents of the borough.</td>
<td>None</td>
<td>No</td>
</tr>
</tbody>
</table>

These sites are 2 of only 4 known locations in the United Kingdom for the European Stag Beetle. Additionally, Wimbledon Common is an important site of Northern Atlantic wet heaths and European dry heaths.
Appendix 2: Correspondence with Natural England

Dear Ms Curnow

RE: HABITATS REGULATIONS ASSESSMENT OF THE REIGATE AND BANSTEAD CORE STRATEGY PREFERRED OPTIONS DOCUMENT

Thank you for consulting Natural England on the above document as part of your Local Development Framework. Natural England notes that the Habitats Regulations Assessment (HRA) is at a draft stage, and that the Council is requesting comment to enable the HRA to progress. A final and complete record of the HRA of the submission draft of the Core Strategy should be submitted alongside the Core Strategy for Examination. Natural England is pleased to see that the HRA is developing alongside the Core Strategy, and that the council should inform the progression of the Core Strategy to submission stage. Natural England welcomes the use of a 15km zone to check for possible Impacts on European and international wildlife sites.

The draft assessment at this stage takes a site by site approach, and suggests that some sites could be ‘screened out’ at this stage. The current Core Strategy document is still developing and in order to progress to a final and comprehensive assessment, Natural England advises that sites should not be ‘screened out’ until the final record of the HRA is produced at submission draft. Natural England does however agree that, considering the current stage of the Core Strategy, effects on those sites listed as screened out are unlikely.

The record of the HRA, taken forward from this initial draft, should explain what measures are to be implemented to ensure that the plan does not have an adverse effect on the integrity of any European or international wildlife site. In terms of the final record of the HRA, Natural England would normally expect to see a record of a policy by policy assessment of potential impacts, so that each aspect of the plan has been assessed and a record made of conclusions drawn. The current site by site assessment is a very helpful and important part of the assessment, and should also feature in the final record. This ensures that all aspects of the plan and all features of each site have been fully assessed. The policy by policy record should explain why each policy is considered not likely to have a significant effect, and where a potential effect is highlighted, should explain what changes have been made to the Core Strategy to avoid the effect.

It is noted from the initial draft HRA that a number of key issues are emerging that need to be addressed by the final submission stage. These include recreational disturbance, ensuring appropriate management and air quality. This should inform the development of the Core Strategy towards the submission stage, ensuring that any damaging policies are not included or are suitably amended.

Natural England has the following advice at this stage in terms of the outcomes of the HRA thus far:

Air quality

Reigate & Banstead Borough Council
Core Strategy
When considering the impact of traffic generated air pollution, it is necessary to consider any development allocation, or focus of development that falls within 200m of a European or international site. This would include any additional infrastructure, or upgrading of existing infrastructure, or indeed any allocation that would subsequently lead to such infrastructure development.

Recreational pressure
Natural England notes that the assessment covers both Ashdown Forest SAC/SPA and Mole Gap to Reigate Escarpment SAC and quite rightly highlights recreational pressure as a potential impact.

Considering the HRA set out for the South East Plan it is clear that this Regional assessment makes numerous requests to local authorities. The Regional HRA directs local authorities to work together to consider the potential impacts and possible measures to prevent adverse effects on European and international sites as a result of increased recreation. The Regional HRA goes on to recommend that where recreational pressure is considered likely to be an issue, local authorities could implement a §106 funding regime for improved habitat management and/or the provision of alternative recreational space.

Considering the sites specifically, for Ashdown Forest SAC/SPA the recreational pressure and disturbance is as a result of local and regular visits, although tourism is an additional factor for this site. In considering the recreational pressure on the Thames Basin Heaths SPA, Natural England has commissioned considerable research on visitor use, and concluded that new development within a 5km radius would be likely to have a significant effect on the SPA, when considered in combination with other plans and projects. Ashdown Forest has some affinities with the Thames Basin Heaths, as lowland heath supporting both nightjar and Dartford warbler. It is possible therefore, in the absence of any other evidence available, to conclude that new residential development within the Reigate and Banstead Borough, which will be considerably more than 5km away, is not likely to have a significant effect.

For Mole Gap to Reigate Escarpment SAC the recreational pressure is mainly around honey pot sites, which are primarily visited by tourists although some local and regular visits are made. The developing Core Strategy and HRA will need to consider the locations of new development, and whether new housing in close proximity to the SAC is likely to result in increased recreational pressure. Appropriate mitigation measures may need to be considered. Natural England would be happy to assist as options are finalised and the submission draft prepared. Considering the impact of tourism, the HRA and Core Strategy may need to direct future plans that more specifically relate to tourism to assess any tourism impacts and ensure that future plans similarly meet the requirements of the Habitats Regulations in terms of demonstrating no adverse effect on European or international wildlife sites. The inclusion of the suggested paragraph below will also give a clear direction to future plans.

Site management
Mole Gap to Reigate Escarpment SAC has a number of management issues that are related to the use of the site by people. As with recreational pressure, it may be necessary to consider mitigation measures that may need to be applied. New housing adding to the volume of people using the SAC may need to contribute to management requirements that alleviate people pressure, or consideration may need to be given to access restrictions. It may be useful to discuss options with neighbouring authorities that also include part of the SAC within or close to their boundaries, to ensure a co-ordinated approach. Again Natural England would be happy to contribute to discussions as the submission draft of the Core Strategy and the final HRA are prepared.

The assessment of plans under the provisions of the Habitats Regulations should ensure that the plan itself does not lead to any adverse effect on any European or international wildlife site, and also that any future plan or project that stems from the plan similarly does not have an adverse effect. It is therefore advised that, the submission draft of the Core Strategy should include an explanatory paragraph as follows:

"The Reigate and Banstead Borough includes the Mole Gap to Reigate Escarpment Special Area of Conservation, and a number of other European or Ramsar wildlife sites are located within the wider area. This Core Strategy has been assessed under the provisions of the..."
Habitats Regulations to ensure that it will not have an adverse effect on any European or Ramsar wildlife site and this assessment has been recorded. The Core Strategy does not support any project proposal where it cannot be demonstrated that the development would not have an adverse effect on the integrity of any European or Ramsar wildlife site. Any subsequent plan following this Core Strategy will similarly adhere to the requirements of the Habitats Regulations.”

With the addition of the above suggestions and amendments Natural England hopes to be able to agree to the final HRA and its conclusions, and that the final HRA will be able to demonstrate that any adverse effects on the integrity of neighbouring sites have been avoided, both alone and in combination.

It is hoped that the comments above are useful to you. Please do contact me if you wish to discuss any point in further detail or have any queries.

Yours sincerely

Colin Pritchard

Colin.Pritchard@naturalengland.org.uk
Date: 10th April 2008

Dear Prem

Re: Stage 2(a) Appropriate Assessment of Reigate & Banstead Borough Council’s Core Strategy (March 2008)

Thank you for consulting Natural England on the above document as part of your Local Development Framework (Amanda Curnow’s email dated 18th March 2008). We welcome the opportunity to comment at this stage and to add to our representations already made at earlier stages. As noted in our previous letter, we are pleased to see that the Habitats Regulations Assessment (HRA) is developing alongside the Core Strategy to submission stage.

In addition to our comments made on the Stage 1 Assessment (our letter dated 26th June 2007) we can offer the following advice in terms of the outcomes of the HRA so far:

Assessing 5 key impacts of the Core Strategy

We note from section 1.5 of the Stage 1 Report (Preparing for Appropriate Assessment) that 5 key impacts of the Core Strategy were not screened out. These are assessed further in the Stage 2 Appropriate Assessment (sections 2.1 - 2.5), and our comments are provided below.

2.1 – Recreational disturbance at Mole Gap to Reigate Escarpment SAC

It is likely that the nearer residential development is to a site, the more it will be used for recreation. It is therefore possible that the Core Strategy could contribute to increased recreational pressure on the SAC. However, it is important to note that we do not advocate using the 5km boundary “as the kind of distance over which one might expect to see a significant recreational impact” (section 2.1 – ‘The five-kilometre threshold’). A 5km zone is used for the Thames Basin Heaths SPA following research into visitor use on heathlands, and in order to protect the three ground nesting birds for which the SPA is notified (nightjar, Dartford warbler, and woodlark) from recreational pressure. There is less evidence to suggest that the majority of visitors to Mole Gap to Reigate Escarpment SAC come from within 5km. It is more useful to assess the type of recreation pressure affecting Mole Gap to Reigate Escarpment SAC specifically, as is considered later in section 2.1 (‘Honeypot sites’, and ‘Survey information’).

It is determined that additional recreational pressure as a result of the Core Strategy will be minimal, and that this additional pressure can be managed, via the proposed avoidance measures, so that there will be no adverse effect on the integrity of the SAC. We generally agree with this conclusion, but feel that some of the proposed avoidance measures require additional consideration if they are to be effective:
• We are pleased to note the commitment of the Council to work together with other Councils, the National Trust, and the Surrey Hills AONB board.

• We welcome the proposal that some of the funding from new development proposed in the Core Strategy should be steered towards positive management of the SAC, especially ‘honeypot’ sites. This will ensure that increased recreational pressure as a result of new development will be less likely to adversely affect the SAC. However, it will need to be clarified how this will work, and which developments will contribute. We advise that access management should be designed so that recreation positively contributes to the site.

• Ongoing monitoring of recreational pressures on the SAC would be useful. However, a clear plan for this should be laid out, and related to the management of the site described above. Please note that a baseline assessment will need to be carried out to establish how additional visitor pressure is affecting the site.

• It is important to note that enhancing existing open space may not help to alleviate additional recreational pressure on ‘honeypot’ locations within the SAC. Other open space would need to act as a suitable alternative to ‘honeypot’ sites. This is difficult to do since people visit these ‘honeypot’ sites for their special characteristics (e.g. as a viewpoint). Avoidance measures should relate specifically to the impacts they aim to avoid. We agree that open space is important, provided that the size, nature and management of this open space is adequately considered.

2.2 – Maintenance (and risk of cessation) of grazing at Mole Gap to Reigate Escarpment SAC

Natural England agrees that, with the proposed avoidance measures in place, it is unlikely that the Core Strategy will have an adverse effect on Mole Gap to Reigate Escarpment SAC through lack of maintenance of grazing at appropriate locations. The proposed S106 agreements and visitor management to address grazing concerns could be linked to the avoidance measures described in section 2.1.

2.3 – Air quality at Mole Gap to Reigate Escarpment SAC

We support the proposed avoidance measures and agree with the ‘Conclusions to 2.3’. This issue should be addressed further in more specific Local Development Documents, such as the Site Specific Allocations of Land.

2.4 – Recreational disturbance at Ashdown Forest SAC and SPA

We agree with the conclusion to this section, that additional recreational pressure as a result of the Core Strategy is not likely to have a significant effect on Ashdown Forest SAC and SPA. We support the proposal to promote joint monitoring and management of recreational pressure on European sites.

2.5 – Air quality at Ashdown Forest SAC and SPA

We agree with the conclusions to this section.

In combination effects

2.6 – ‘In combination’ effects of other districts’ plans
We are encouraged that ‘in combination’ effects off other Districts’ plans are being considered. However, there is not enough information at present conclude that the Core Strategy, in
combination with other plans, will have no adverse effect on European sites. This should be considered again later in the HRA process.

2.7 – ‘in combination’ effects of the South East Plan

We support your conclusion that there does not seem to be any significant in combination effects arising from the South East Plan. However, please note that the Core Strategy should include policies on biodiversity, design and landscaping to ensure the protection of mature trees, hedgelines and watercourses, rather than relying on other Local Development Documents to address this.

We would expect the next stage of the Habitats Regulations Assessment to outline the avoidance measures described in Stage 2(a) in more detail. These should be secured before any of the potential impacts described above are screened out.

We note that a policy by policy assessment of potential impacts will be carried out at Stage 2(b), later in plan production. This will ensure that each aspect of the plan has been assessed and a record made of the conclusions drawn. In addition, we still recommend that the useful site by site assessment should also feature in the final record.

Please note that the explanatory note quoted on page 24 of the Stage 2a Appropriate Assessment ('important note' number 3) should be included in the submission draft of the Core Strategy, rather than in the Appropriate Assessment report. In addition, we still recommend that sites and potential effects should not be screened out until the final record of the HRA is produced at submission draft.

Please note that a final and complete record of the HRA of the submission draft of the Core Strategy should be submitted alongside the Core Strategy for Examination.

I hope the above comments are useful. Please do not hesitate to contact me if you have any queries or would like to discuss any of these points further.

Yours sincerely,

Amy Francis  
Environmental Planning Adviser  
Government Team - Kent, Sussex & Surrey

Tel: 01273 407957
Fax: 01273 407930
Email: amy.francis@naturalengland.org.uk
Date: 19 November 2008

Sophie Benazon  
Reigate & Banstead Borough Council  
(via email)

Dear Sophie

Re: Appropriate Assessment of Reigate & Banstead Borough Council’s Core Strategy  
(November 2008)

Thank you for consulting Natural England on the above document as part of your Local Development Framework. We welcome the opportunity to comment at this stage and to add to our representations already made at earlier stages.

In addition to our comments made on the Stage 2 Assessment (our letter dated 10 April 2008) we can offer the following advice:

- We support the approach taken in Section 2.2.10 and 2.3.8 to initially plan for the highest figure and agree that a decision to progress a higher number of houses will require a revision to the Appropriate Assessment;
- Section 2.3.11 – Bechstein bats are also a feature of Mole Gap to Reigate Escarpment SAC so the potential disturbance to this species should also be listed under effects to the SAC;
- We recommend that wording of 3.2.14 is amended to "it is considered that the new development within Reigate and Banstead BC and Mole Valley DC will have no adverse impact on the integrity of the SAC alone or in combination with other plans or projects”
- We support and welcome the avoidance measures in Section 3.2.22.
- Section 3.2.24 should state “no adverse impact” rather than “no adverse effect”.
- We recommend that the first bullet point Section 3.3.3 is amended to “…although this can be lessened…” rather than “…this is unlikely…”.
- We recommend that Section 3.4.23 is amended to say “…levels of pollutants are within the levels…”.
- We support Section 3.4.24 to continue to monitor the levels of pollutants on the SAC.

I hope the above comments are useful. Please do not hesitate to contact me if you have any queries or would like to discuss any of these points further.

Yours sincerely

Marian Ashdown  
Government Team  
Tel. 01273 407961  
Email: marian.ashdown@naturalengland.org.uk
Date: 27 July 2009

Sophie Benazon
Reigate & Banstead Borough Council

By email only, no hard copy to follow

Dear Sophie,

Revised Appropriate Assessment (AA) for the Reigate & Banstead Core Strategy

Thank you for consulting Natural England on the above document. We welcome the opportunity to comment at this stage and to add to our representations already made at earlier stages.

Overall, Natural England is satisfied with the contents of the document, and agrees with the council’s approach to the AA and conclusions made in light of the Council’s suggested modifications to the Planning Inspector (paragraphs 2.3.3, 3.2.19, 3.3.8-9, 3.4.23, 3.6.12-13, 3.7.8, 3.7.10 and 3.8.5-6). We concur that the avoidance measures set out within the AA will ensure the additional housing for the Borough as confirmed in the revised Core Strategy, including the ‘notional higher figure’ scenario, will not have significant adverse effects on the Mole Gap to Reigate SAC and Ashdown Forest SAC/SPA through recreation pressure and air quality.

However, we recommend that in paragraphs 3.6.2-3, reference is now made to 7.5km rather than 5km from the boundary of the Ashdown Forest SAC/SPA in terms of recreation pressure, in light of recent evidence from visitor surveys provided by Wealden and Mid Sussex District Councils which shows at least 70% of visitors come from a 7.5km catchment area.

We hope you have found these comments useful. If you have any queries regarding the above, please get in touch.

Yours sincerely,

Julia Coneybeer
Environmental Planning Advisor
Government Team – Sussex, Surrey and Kent
Tel: 0300 060 4052
Email: Julia.Coneybeer@naturalengland.org.uk
Date: 15 February 2012
Our ref: 44072

Sophie Benazon
Green Infrastructure Officer
Reigate & Banstead Borough Council

By email only, no hard copy to follow

Dear Sophie Benazon,

Reigate & Banstead AA Resubmitted Core Strategy DRAFT 250112

Thank you for your email dated 25 January 2012 consulting Natural England on the above.

Natural England is satisfied with the approach taken on the revised Habitats Regulations Assessment (HRA) screening, taking into account the now lower proposed housing allocation of 6,900 units.

Given the housing allocation is the most significant modification in the revised Core Strategy (CS) in relation to the Habitats Regulations Assessment (HRA), and the spatial distribution of housing remains unaltered, Natural England is satisfied this does not present any significant change in potential impacts of the CS on European sites compared to the earlier versions of the CS and HRA. As such we maintain our concurrence with the conclusions made in the revised AA of no likely significant effect of the CS on European sites.

In particular with regard to Mole Gap to Reigate Escarpment SAC, this takes into account the proposed avoidance measures set out in section 3.2.21, including delivery through the Green Infrastructure Strategy, to address potential adverse recreational impacts on the SAC resulting from the proposed housing allocation, as well as future planned residential development in neighbouring Boroughs.

I hope the above is helpful, if you have any further queries please let me know.

Yours sincerely

Julia Coneybeer
Environmental Planning Advisor
Land Use Service Team - Ashtead
Tel: 0300 060 4062
Email: Julia.Coneybeer@naturalengland.org.uk
Appendix 3a: Visitor Surveys: Bournemouth University Study

1 Introduction

In 2005 and 2006, Professor Calver of Bournemouth University undertook research on behalf of the National Trust to determine the volume of visitors to certain National Trust properties. Bournemouth University and the National Trust have made these data available to the Councils in order to assist their evaluation into the impacts of any additional visitors to the SAC, as a result of their Core Strategies, as part of the Appropriate Assessment. Data from earlier studies (2004) were also provided by the National Trust.

The following summarises the surveys undertaken and the results of the studies.

2 Methodology

Bournemouth University carried out visitor surveys of the following sites within the Mole Gap to Reigate Escarpment SAC: Headley Heath, Box Hill and Reigate Hill/Gatton Park (Wray Lane). These sites are part of the North Downs estate managed by the National Trust. They are key sites in the area, attracting visitors for their views over the Surrey Hills.

Bournemouth University has established a classification system which classifies sites as one of:

1 Open countryside
2 Open with known features
3 Single features
4 Small areas of countryside, no feature
5 Parkland

Bournemouth University considers Box Hill and Leith Hill as ‘iconic.’ It has a strong emotional appeal to markets within a reasonably wide radius and broadly fit category 2. Reigate and Gatton are also category 2, but with less ‘iconic’ appeal, although with considerably higher through traffic from the M25. Headley Heath has characteristics of category 1.

Stage 1: Visitor Counts

A standard methodology, was used in the study, developed through research by Bournemouth University, and used for similar visitor surveys in other areas of the UK and Ireland. In order to ensure representative data, visitor counts were undertaken during different seasons, different times of the day and different weather conditions.
Stage 2: Origin of Visitors

The second stage of the visitor survey determined where visitors came from.

As an integral part of this study, Bournemouth University evaluated annual road ‘populations’ from traffic counts in order to determine the influence of the road network on visitor numbers.

3 Results of the Study

Annual Visitor Counts

Annual visitor counts were as follows:

<table>
<thead>
<tr>
<th>Site</th>
<th>Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>Box Hill</td>
<td>828,000</td>
</tr>
<tr>
<td>Headley Heath</td>
<td>209,000</td>
</tr>
<tr>
<td>Reigate Hill and Gatton Park</td>
<td>268,000</td>
</tr>
</tbody>
</table>

Visitor Origins

The approximate visitor travel distances for the four sites were obtained during the visitor survey. The results, showing the percentage of visitors at each site by origin (distance from home), are shown in Table 1:

<table>
<thead>
<tr>
<th>Distance from home (Miles)</th>
<th>Box Hill</th>
<th>Headley</th>
<th>Reigate Hill and Gatton Park</th>
</tr>
</thead>
<tbody>
<tr>
<td>Under 5</td>
<td>14</td>
<td>18</td>
<td>7</td>
</tr>
<tr>
<td>5-14</td>
<td>15</td>
<td>28</td>
<td>12</td>
</tr>
<tr>
<td>15-24</td>
<td>10</td>
<td>20</td>
<td>15</td>
</tr>
<tr>
<td>25-49</td>
<td>41</td>
<td>29</td>
<td>28</td>
</tr>
<tr>
<td>50-74</td>
<td>12</td>
<td>3</td>
<td>20</td>
</tr>
<tr>
<td>75+</td>
<td>8</td>
<td>2</td>
<td>18</td>
</tr>
</tbody>
</table>

These data show that although local visitors do come to the site, they make up a very small percentage of the total visitors. Wray lane car park (one of the car parks on Reigate Hill) is hardly used by local people.
The majority of people coming to the site are from further a-field, with over 80% (82% at Headley, rising to some 93% at Reigate Hill/Gatton originating from over 5 miles away and over 54% (Headley), rising to 81% (Reigate Hill/Gatton) originating from over 15 miles away. The results show how visitor numbers are heavily influenced by accessibility from the road network. However it should be noted that this survey was based on visitors at car parks and therefore there will be an inherent bias towards visitors travelling by car rather than other means of transport potentially from more local areas.

Bournemouth University surveyed the area around the car park. They found that the visitor area was small, the majority of visitors travelling only a short distance from the car park. There was found to be a large visitor impact within about 100 m of the car park, but beyond about 1 km of the car park, the impact was very low. This supports other findings that recreational pressure on the SAC is focused around honeypot sites.

Bournemouth University indicate that these data show similar characteristics to studies from other National Trust sites and elsewhere. For example some 39% of visitors at spend up to one hour at a site and travel approximately one mile out and back from the access point, demonstrating the local impact at honeypot sites such as car parks.

From further research, the University considers that visitor counts at sites depend on a number of factors including the car park capacity, the transient population on roads, signage and other information at or near the site, and resident population. Numbers also depend on various site characteristics such as the size and characteristics of the property, visitor facilities and footpaths and access from residential areas. The weather, time of day, day of the week and season are also an influence.

4 Conclusions

The above studies indicate that recreational pressure at the Mole Gap to Reigate Escarpment SAC is and will be focused mainly around honeypot sites, with the majority of impact being within a small radius of the car parks. The studies also show that although there are local visitors to the sites, large numbers originate from over 15 miles away and therefore the majority of recreational pressure is caused by visitors travelling from further a field outside the scope of the Reigate & Banstead Core Strategy.
Appendix 3b: Visitor Surveys: National Trust 2003

The following summarises the 2004 National Trust visitor survey of Box Hill. The survey asked the origin of visitors to the Trust properties. 5364 responses were received at Box Hill. 13 postcode regions were recorded as the source of at least 1% of visitors to Box Hill. In total they made-up 87% of all visitors. There were an additional 84 postcode regions recorded each with less than 1% of visitors, but indicating the very broad spread of visitors. Postcodes within Reigate & Banstead Borough Council are: KT20, RH1, RH2, SM7.
<table>
<thead>
<tr>
<th>Postcode (PT)</th>
<th>Broad Area</th>
<th>Number of Visitors</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Google Maps</td>
<td></td>
<td>1242</td>
<td>23</td>
</tr>
<tr>
<td>SM</td>
<td>Sutton</td>
<td>691</td>
<td>13</td>
</tr>
<tr>
<td>RH</td>
<td>Redhill</td>
<td>666</td>
<td>12</td>
</tr>
<tr>
<td>SW</td>
<td>SW London</td>
<td>489</td>
<td>9.1</td>
</tr>
<tr>
<td>CR</td>
<td>Croydon</td>
<td>329</td>
<td>6.1</td>
</tr>
<tr>
<td>TW</td>
<td>Twickenham</td>
<td>306</td>
<td>5.7</td>
</tr>
<tr>
<td>GU</td>
<td>Guildford</td>
<td>227</td>
<td>4.2</td>
</tr>
<tr>
<td>SE</td>
<td>SE London</td>
<td>175</td>
<td>3.3</td>
</tr>
<tr>
<td>BN</td>
<td>Brighton</td>
<td>100</td>
<td>1.9</td>
</tr>
<tr>
<td>BR</td>
<td>Bromley</td>
<td>74</td>
<td>1.4</td>
</tr>
<tr>
<td>TN</td>
<td>Tonbridge</td>
<td>68</td>
<td>1.3</td>
</tr>
<tr>
<td>W</td>
<td>W. London</td>
<td>57</td>
<td>1.1</td>
</tr>
<tr>
<td>RG</td>
<td>Reading</td>
<td>55</td>
<td>1</td>
</tr>
</tbody>
</table>

Table 2.2 Detailed Examination of Post Code Data: Sources of Visitors to Box Hill 2004

<table>
<thead>
<tr>
<th>postcode (PT)</th>
<th>Broad Area</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>CR0</td>
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