

**Reigate and Banstead Local Plan  
Development Management Plan  
Regulation 18 Consultation Document**

**Habitats Regulations Assessment**

**DRAFT**

*Note that this paper is currently in draft form, awaiting comments from Natural England*

**May 2016**

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# 1. Introduction

## The requirement to undertake Habitats Regulations Assessment

- 1.1 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<sup>1</sup>. 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)<sup>2</sup>.
- 1.2 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.

## What does this report do?

- 1.3 Reigate & Banstead Borough Council is currently preparing its Development Management Plan (DMP), part 2 of its updated Local Plan. Part 1 of the Local Plan, the Core Strategy, was adopted in July 2014 and includes policies that define the overall the overall scale and location of growth in the borough until 2027. The DMP will provide the detailed policies and site allocations to deliver the Core Strategy. The DMP will be accompanied by a Policies Map, showing designations and development allocations.
- 1.4 This report seeks to determine whether the DMP Regulation 18 consultation document (October 2015) – and the proposed policy approaches and potential development site options within it – will have any significant adverse impacts on protected European habitats or species, either alone or in combination with other plans or proposals.
- 1.5 Natural England has been consulted on the development of this report.

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<sup>1</sup> Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites

<sup>2</sup> The Conservation of Habitats and Species Regulations (Habitats Regulations) 2010 updates the Conservation (Natural Habitats etc) Regulations 1994 (as amended).

## 2. Methodology

2.1 European guidance on HRA recommends a process of up to four stages. These are summarised in Figure 1.

**Figure 1: Stages in HRA**

Stage	Summary
Stage 1a	Screening Stage - Determining whether the plan directly connected with or necessary to the management of that European site. If it is not, 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 this) on the integrity of the site. If not, the plan can proceed.
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.

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.

### 2.3 Structure of this report

2.4 The rest of this report is structured as follows:

- a. Section 3: The Core Strategy: summarises the findings of the Core Strategy HRA.
- b. Section 4: The Development Management Plan Regulation 18 consultation: summarises the content of the DMP consultation which is the subject of this report
- c. Section 5: HRA Screening Assessment: summarises the outcome of the DMP consultation document screening assessment
- d. Section 6: Next Steps: sets out the next steps for the Council.

### 3. The Core Strategy

3.1 The Development Management Plan that is now being prepared by the Council follows on from the Core Strategy, adopted in 2014. The purpose of the Development Management Plan is to deliver the Core Strategy. The policies and site allocations that are made through the DMP will therefore align with the policies and overall spatial strategy set out in the Core Strategy. For that reason, the findings of the Core Strategy HRA Screening Assessment are relevant to this DMP HRA Screening Assessment. The potential impacts identified have been used to inform the screening of DMP policies and site options.

3.2 The levels of growth proposed in the Core Strategy are set out in Figure 2.

**Figure 2: The levels of growth proposed in the Core Strategy**

Topic	Plan/proposal	Notes
Housing scale	6,900 homes between 2012 and 2027 (460dpa)	Alternative scales of housing growth tested at earlier stages of plan formulation
Housing location	Urban sites Area 1: 930 homes Area 2a: 1330 homes Area 2b: 280 homes Area 3: 2440 homes	Plan looks sequentially to urban sites first. Urban provision in Horley includes 2 new neighbourhoods
	Sustainable Urban Extensions Around Horley: 200 homes East Redhill/Merstham: 500-700 homes South/South West Reigate: 500-700 homes	Monitoring targets and triggers will ensure land only released for sustainable urban extensions if insufficient urban land supply. Areas of land within proximity of the Mole Gap to Reigate Escarpment screened out
Employment scale and location*	Approx 46,000sqm	Focus on accommodating additional floorspace in town centres and existing industrial estates. Includes 7,000sqm in Redhill town centre.
Retail scale and location*	25,800 sqm comparison floorspace 11,700sqm convenience floorspace	Majority of retail growth focused in Redhill Town Centre, with more limited growth in other centres to retain a constant market share.
Major infrastructure	Gatwick Airport	Proximity to Airport means good national/international transport links, but also brings problems such as traffic congestion, noise and air pollution that need to be managed.

\* subject to regular monitoring of demand levels

3.3 The potential impacts of the Core Strategy on Natura 2000 sites are summarised in Figure 3.

**Figure 3: Key potential impacts of the Core Strategy on Natura 2000 sites**

Natura 2000 site	Potential impacts	Potentially arising from:
Mole Gap to Reigate Escarpment SAC	Potential impacts on habitat due to increased recreational usage	Core Strategy and in-combination with other plans
	Potential impact on habitat due to maintenance (and risk of cessation) of grazing	In-combination with other plans

	Potential impact on habitat due to increased air pollution	Core Strategy and in-combination effects. (NB this is a regional issue)
	Potential disturbance to roosting populations of Bechstein's bats, a European Protected Species	In combination with other plans.
Ashdown Forest SAC and SPA	Potential impact on nationally important bird populations due to increased recreational usage	Core Strategy and in combination with other plans (R&B effects likely to be very limited)
	Potential air pollution	Core Strategy and in combination with other plans (R&B effects likely to be very limited)
Protection of European Protected Species outside European designated Site Boundaries	Potential disturbance to roosting populations of Bechstein's bats, a European Protected Species (section 2.4.7)	In combination with other plans.

- 3.4 **Recreational usage:** Recreation activities and human presence can have an adverse impact on the integrity of a Natura 2000 site as a result of erosion, trampling or general disturbance. The Core Strategy HRA Screening Assessment concludes that, in principle, new housing proposed in the borough could result in an increase in visitors to the Mole Gap to Reigate Escarpment SAC, and – potentially – the Ashdown Forest SAC and SPA.
- 3.5 The Core Strategy Appropriate Assessment stage concluded that, for the Mole Gap to Reigate Escarpment SAC, recreational pressure created by the proposals in the Core Strategy in combination with other plans/projects would be minimal in relation to the large number of visitors who come from outside the borough. The implementation of avoidance measures should result in no adverse impact on the integrity of the SAC. The avoidance measures proposed were:
- a. Positive visitor management and access management
  - b. Site management around honeypot sites
  - c. Encouraging visitors to alternative sites in the vicinity of the SAC
  - d. Provision of new open space as part of new developments and/or enhancement of existing alternative recreation sites, including via a new Green Infrastructure Strategy
  - e. HRA assessments of projects, as required by Policy CS2 of the Core Strategy, and developer contributions as appropriate
- 3.6 The Core Strategy Appropriate Assessment stage concluded that, in relation to the Ashdown Forest SAC and SPA, recreational pressure created by the Core Strategy was highly unlikely to cause recreational disturbance at this site, and that the Core Strategy would therefore not have any adverse impact in this regard.
- 3.7 **Maintenance (and risk of cessation) of grazing:** Maintenance of a sympathetic grazing regime is key to the continued presence of chalk grassland, which is an important feature of the Mole Gap to Reigate Escarpment SAC. Grazing suppresses the growth of more competitive plant species and encourages a more diverse selection of plants compared to mowing.

- 3.8 The Core Strategy Screening Assessment concluded that the maintenance of grazing could be threatened by an increase in public objection to stock fencing, possible disturbance to grazing animals due to increased visitor numbers and competition for financial resources for grazing and stock fencing.
- 3.9 The Core Strategy Appropriate Assessment stage concluded that, with proposed avoidance measures, the Core Strategy would not have an adverse effect on grazing within the SAC. Avoidance measures were identified as:
- a. Improved interpretation and continued joint working in relation to visitor management methods
  - b. Improved visitor facilities in conjunction with grazing infrastructure
  - c. Provision of new local open space as part of new developments and/or enhancement of existing alternative recreation sites.
- 3.10 Air pollution: Air pollution is most likely to directly affect plant, soil or water habitats, however may affect fauna indirectly as a result of a deterioration in habitat. Deposition of pollutants to the ground can result in acidification (a consequence of which is a change in the vegetation that soils can support), eutrophication (which can cause competitive paly species to dominate over slower growing and rarer species) and ozone exposure (which can directly damage plants, reducing growth rates and increasing vulnerability to water stress).
- 3.11 The Core Strategy HRA Screening Assessment identified that air pollution generated by increases in vehicle movements may contribution to eutrophication and/or ozone exposure, potentially impacting both the Mole Gap to Reigate Escarpment SAC and the Ashdown Forest SA and SPA.
- 3.12 In relation to the Ashdown Forest SAC and SPA, the Core Strategy Appropriate Assessment concluded that additional air pollution created by the proposals contained in the Core Strategy would not have an adverse impact on the integrity of the SAC and SPA.
- 3.13 In relation to the Mole Gap to Reigate Escarpment SAC, the Core Strategy Appropriate Assessment concluded that additional air pollution created by the proposals in the Core Strategy would be minimal. The Core Strategy would not therefore have an impact on the SAC in this way. It also noted that the Council would assess significant localised effects at a more local level, for example in relation to site allocations (an aspect of the DMP).
- 3.14 Disturbance to roosting populations of Bechstein's bats: The Bechstein's Bat is a European Protected Species. The bats require foraging areas within 3.5km of their roosts, which may be outside of the directly protected Natural 2000 habitat.
- 3.15 The Core Strategy Screening Assessment identified that the Mole Valley to Reigate Escarpment SAC supports a population of Bechstein's bats. It notes that it has been suggested that there are areas outside of the SAC that are of importance as foraging and roosting sites, and that the loss of trees and habitats through development may be damaging to, or result in severance of, bats' flight lines between the SAC and surrounding foraging/roosting areas. It

also notes the potential impacts of climate change and wider urbanising effects on this protected species.

- 3.16 The Core Strategy Appropriate Assessment concludes that policies contained in the Core Strategy should result in a net gain in biodiversity and not result in harm to these bats (or other species). In particular it notes that through policies on biodiversity, design and landscaping, mature trees, woodlands, and hedgerows can be maintained, and that measures to manage recreational impact can also be used to limit urbanising effects.

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## 4. The Development Management Plan Regulation 18 consultation

- 4.1 As noted above, the DMP will deliver the scale of growth included in the Core Strategy, in accordance with the spatial strategy the Core Strategy sets out.
- 4.2 The Regulation 18 consultation is the first stage in the preparation of the DMP. It should be noted that the consultation document does not represent the final draft Development Management Plan: a draft plan will be prepared in the first half of 2016, and will be subject to further consultation, and examination by an independent planning inspector, before it is adopted by the Council.
- 4.3 The DMP Regulation 18 consultation document contains three main aspects:
- Proposed criteria based policies to guide decision making on planning applications
  - Proposed designation boundaries, within which particular policy approaches will be applied
  - Potential development sites for housing, employment, retail and mixed use development
  - Broad locations for other types of development, including traveller accommodation.
- 4.4 The content of the DMP is guided by the proposed objectives set out in Figure 4.

**Figure 4: Proposed DMP objectives**

PE1: Safeguard existing employment land and premises to ensure that there is adequate space for businesses to locate in the borough.
PE2: Provide flexibility for local businesses to start up, grow, diversify and prosper.
PE3: Help new development to deliver jobs and skills benefits for local people
PE4: Protect the vitality and viability of our town centre shopping areas
PE5: Protect the viability of smaller scale but vital local shopping areas
PE6: Ensure that both town and local centres are resilient and able to respond to future changes
SC1: To ensure that new development makes the best use of land whilst also being well designed and protecting and enhancing local character and distinctiveness
SC2: To ensure an appropriate mix of housing types and sizes, offering a good standard of living to future occupants
SC3: To minimise the impacts of development, and the development process, on local residents and local amenity
SC4: Protect the most valuable open space within the urban areas
SC5: Encourage the provision of open space as part of new developments, and where appropriate new outdoor sport and recreation provision.
SC6: Require new developments to provide adequate parking, whilst recognising the need to encourage sustainable transport choices, particularly in the most accessible locations
SC7: Ensure new developments are served by safe and well designed access for vehicles, pedestrians and cyclists
SC8: Encourage new development to incorporate passive and active energy measures and climate change resilience measures and renewable energy technologies
SC9: Direct development away from areas at risk of flooding, and ensure all developments are safe from flood risk and do not increase flood risk elsewhere or result in a reduction in water quality
SC10: Ensure new development protects, and enhances wherever possible, the borough's landscapes and biodiversity interest features, providing the highest degree of protection to internationally and nationally designated areas.
SC11: Maximise the contribution of new development to a comprehensive green infrastructure

network across the borough.
SC12: Control development in the Green Belt to safeguard its openness, and where possible enhance its beneficial use.
SC13: Conserve and enhance designated heritage assets across the borough, supporting their continuing viable use and cultural benefits.
PS1: Identify a local target for gypsy, traveller and travelling showpeople sites, and allocate sites to achieve this target.
PS2: Ensure future cemetery and/or crematorium provision is located consistent with sustainability principles
PS3: Allocate sites for development across the borough consistent with the Core Strategy and sustainability principles
PS4: Plan for improvements to existing infrastructure and services, and/or the provision of new infrastructure and services, to meet the needs created by new development.

4.5 The DMP focuses on the development and use of land. As such, the content of the DMP could, in theory, have the following potential impacts on European sites:

- a. Physical loss of habitat: development on habitat within the SAC or habitat around the SAC that supports foraging of protected species
- b. Habitat degradation or damage, for example from erosion, trampling (recreational pressure), habitat fragmentation or severance, urbanisation impacts (such as burning, tipping, introduction of invasive species)
- c. Cessation of appropriate management measures (eg grazing) due to conflict with eg recreation
- d. Contamination resulting in habitat degradation or damage – for example soil contamination, waterbody or groundwater contamination or air pollution
- e. Water: reduction in water table/water levels resulting from water abstraction, or flooding resulting from increased runoff.

## 5. Stage 1: Screening Assessment

### Introduction

- 5.1 The purpose of the Screening Assessment stage is to identify whether the plan or project (plan, in this case) is likely to have a significant effect on any Natura 2000 sites, either alone or in combination with other plans or projects. If a likely significant effect is identified, an Appropriate Assessment must then be undertaken into the implications of the plan or project in view of the relevant Natura 2000 site's conservation objectives (Stage 2 of the process as set out in Figure 1 above).
- 5.2 **It should be noted that this assessment has been prepared at the Regulation 18 consultation stage. As proposals within the DMP still remain to be finalised, this Screening Assessment will need to be revisited prior to agreement of a final draft DMP for submission to the Secretary of State.**
- 5.3 Interpretation of 'likely significant effect': Case law<sup>3</sup> provides interpretation of the term 'likely significant effect'
- An effect should be considered 'likely' if it cannot be excluded, on the basis of objective information, that it will have a significant effect on the site
  - An effect should be considered 'significant', if it undermines the conservation objectives of the site; and
  - Where a plan or project has an effect on a site but is not likely to undermine its conservation objectives, it cannot be considered likely to have a significant effect on the site concerned.

### Is the plan directly connected with or necessary to the management of a European site?

- 5.4 The DMP is not directly connected with or necessary to the management of a European site. A Screening Assessment is therefore required.

### Identification of Natura 2000 sites which may be affected by the DMP

- 5.5 This stage seeks to identify Natura 2000 sites within or in proximity to Reigate & Banstead Borough which may be affected by the DMP.

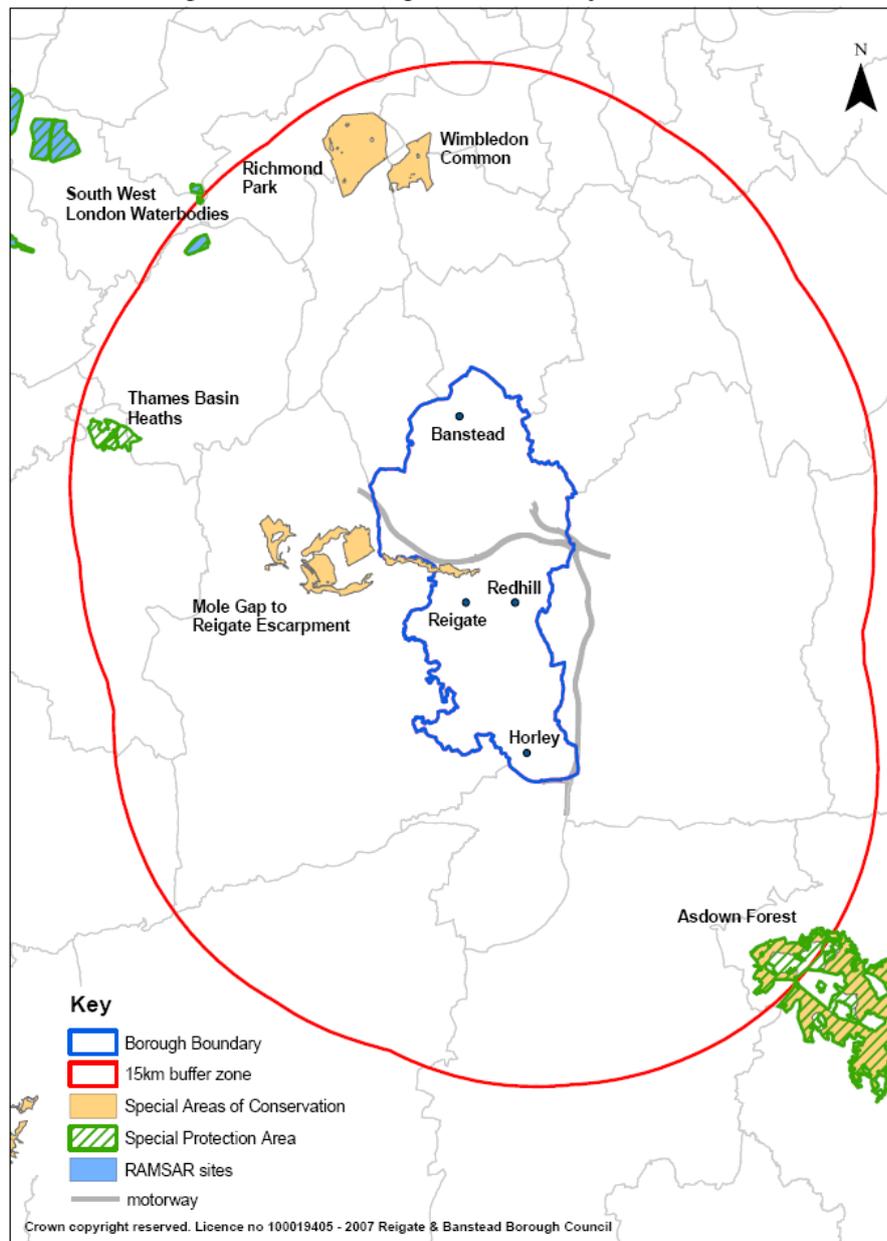
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<sup>3</sup> ECJ Case C-127/02 "Waddenzee", 2004

5.6 Figure 5 indicates all Natura 2000 sites within 15km of the Reigate & Banstead borough boundary. Further information about these sites is provided in Annex 1.

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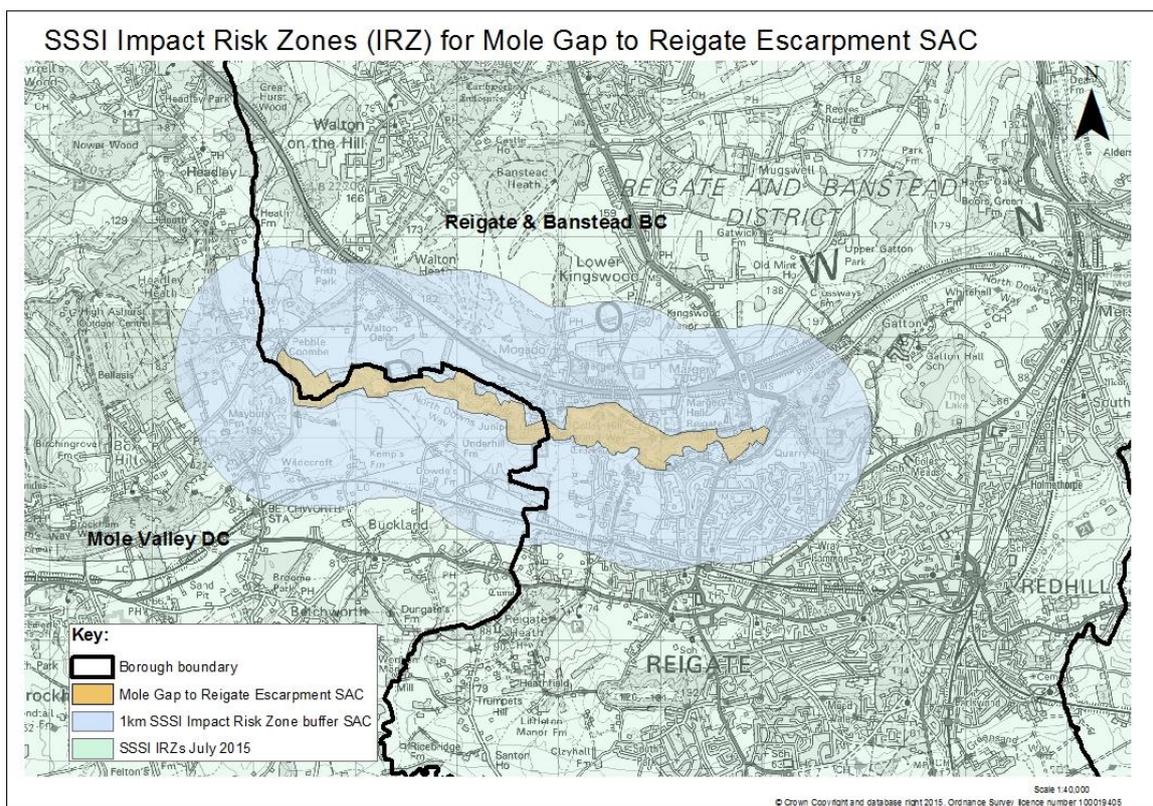
**Figure 5: Natura 2000 sites falling within 15km of Reigate & Banstead**



5.7 As noted above, the proposals and potential development sites in the DMP consultation document are consistent with the overall spatial strategy and level of growth set out in the adopted Core Strategy. The Core Strategy Appropriate Assessment concluded that – of the sites identified in

- 5.8 Figure 5 - the Core Strategy could potentially have an impact on the Mole Gap to Reigate Escarpment SAC.
- 5.9 On the advice of Natural England, consideration has additionally been given to identified SSSI Impact Risk Zones (IRZs) – these have been used as the basis of identifying which Natura 2000 sites may be affected by the DMP.
- 5.10 An assessment of the IRZs has similarly indicated that the only Natura 2000 site which may be affected by the DMP is the Mole Gap to Reigate Escarpment Special Area of Conservation (see Figure 6). Natural England advise that there may be a likely significant effect from development falling within 1000m of this site.

**Figure 6: Map of the Mole Gap to Reigate Escarpment**



- 5.11 The Mole Gap to Reigate Escarpment SAC stretches for 8 miles between Leatherhead and Reigate. The qualifying features are as follows:
- The only known locality in the United Kingdom of stable communities of Box woodland *Buxus sempervirens* on rock slopes
  - One of the best areas in the UK for chalk grassland *Festuco-Brometalia*; important orchid sites, and Yew *Taxus baccata* woodland
  - Significant presence of European dry heaths, Beech forests *Asperulo-Fagetum*; Great Crested Newt *Triturus cristatus*, Bechstein's Bat *Myotis bechsteini*.

5.12 Specific vulnerabilities associated with the Mole Gap to Reigate Escarpment SAC include:

- a. Vulnerability to recreational pressures, particularly chalk grassland.
- b. Need to maintain a sympathetic grazing regime on chalk grassland and dry heaths.
- c. Chalk grassland vulnerable to atmospheric pollution/competition from more vigorous acid loving species.
- d. Atmospheric pollution may increase susceptibility of Beech trees to disease.
- e. Loss of foraging and roosting sites ((ancient) woodland) for Bechstein's bats in the SAC and surrounding areas.
- f. Severance of flight lines for Bechstein's bats (eg hedgerows).
- g. Loss of foraging areas and refuge habitat for Great Crested Newts within 500m of ponds (ie in the SAC and surrounding areas).
- h. Hydrological changes may impact on ponds within the chalk heath, either through pollution or groundwater abstraction.

Identification of other plans and projects which may have 'in combination effects

5.13 As part of the screening assessment to determine whether the plan is likely to have a significant effect on a European site, it is necessary also to consider whether there may also be significant effects in combination with other plans or projects (referred to as 'in-combination effects').

5.14 Figure 7 provides a summary of the plans/projects that have been considered as part of screening assessment.

**Figure 7: Development plans and proposals in and around Reigate & Banstead Borough**

Authority/Area	Plan/project	Summary of proposals	HRA findings (if available)	Change to plan since adoption of Core Strategy?
Tandridge District Council	Core Strategy 2008	Provision for at least 2500 homes between 2006 and 2026	Core Strategy would not pose any significant risk to Mole Gap to Reigate Escarpment SAC or Ashdown Forest SPA/SAC. With measures put in place through the Core Strategy it is unlikely - either alone or in combination - to have a significant impact on these sites	No. Regulation 18 consultation document for revised local plan has been consulted on, but scale/location of development has not been finalised.
Mole Valley District Council	Core Strategy 2009	Provision for at least 3760 homes between 2006 and 2026 6-7 additional traveller pitches 2800sqm of new convenience retail floorspace	Impact on Mole Gap to Reigate Escarpment SAC from recreational pressure and air pollution will be minimal. With measures put in place through the Core Strategy it is unlikely - either alone or in combination - to have a significant impact on this site	No
Epsom and Ewell Borough Council	Core Strategy 2007	Provision for at least 2715 homes between 2007 and 2022	Core Strategy would not have an impact on Natura 2000 sites due to separation distances from the borough, growth locations, and mitigation/avoidance measures included in the plan.	No
Guildford Borough Council	Local Plan 2003	Policy on housing provision no longer being applied; interim housing target of 322.	n/a	No
	Submission draft plan 2016	Provision for 13860 new homes over plan period (2013/2033) 37,200 to 47,200 sqm of employment floorspace 73 gypsy and traveller pitches to 2027 and 2 travelling showpeople plots	Potential for impacts on the Thames Basin Heaths SPA identified, however subject to the inclusion of mitigation and avoidance measures proposed such as SANG the draft Local Plan would have no likely significant effects on the SPA alone or in combination	Yes, although note that this plan has not yet been submitted for examination or adopted.
Elmbridge	Core Strategy	Provision for 3375 homes	Potential for adverse impacts on the Thames Basin	No

Borough Council	2011	between 2011 and 2026 11 additional traveller pitches	Heaths SPA from recreation and urbanisation. With measures put in place through the Core Strategy it is unlikely - either alone or in combination - to have a significant impact on this site	
Waverley Borough Council	Local Plan 2002	Housing requirement out of date	n/a	No
	Emerging Local Plan 2014	Provision of 8450 new homes between 2013 and 2031 37 additional traveller pitches Up to 10ha of employment land	Full HRA not available, however initial assessment considered impact of new housing on Thames Basin Heaths SPA along with provision of SANG.	Yes, although note that this plan has not yet been submitted for examination or adopted.
London Borough of Sutton	Core Strategy 2009	Provision of at least 5175 homes to 2024	No likely significant effects on European sites identified	No. Regulation 18 consultation document for revised local plan has been consulted on, but scale/location of development has not been finalised.
London Borough of Croydon	Local Plan 2013	Provision of at least 20200 homes between 2011 and 2031 10 additional traveller pitches Up to 165000sqm of new employment floorspace	Taking into account the distance of development from the Mole Gap to Reigate Escarpment SAC, Wimbledon Common SAC and Richmond Park SAC, and commitment to establishing a network of alternative open spaces the Plan would not have a likely significant impact on these sites.	Yes. Regulation 18 consultation document for partial review (strategic policies) has been consulted on, but draft plan has not been finalised.
London Borough of Kingston	Core Strategy 2012 and Town Centre AAP 2008	Provision of 5625 homes between 2012 and 2027. 50000sqm of retail floorspace	Core Strategy - Potential for impact on Natura 2000 sites from recreational pressures and air pollution, however taking into account the location of most growth and measures to reduce air pollution the Plan is unlikely - either alone or in combination - to have a significant impact on these sites	No
Crawley Borough Council	Local Plan 2016	About 5,000 new homes between 2015 and 2030 Up to 10 additional traveller pitches Between 23ha and 35ha of	No significant impacts identified on European sites, including the Ashdown Forest SAC alone or in combination with other plans or projects	Yes

		new employment land		
Horsham District Council	Horsham District Planning Framework 2015	16000 between 2011 and 2031 39 additional traveller pitches New business park at land north of Horsham, university quarter mixed use development and employment site intensification	Taking into account proposed avoidance and mitigation measures the plan will not have an adverse effect on site integrity of any European site, alone or in combination with other plans or projects.	Yes.
Mid Sussex District Council	Local Plan 2004	Housing requirement out of date	n/a	No
	District Plan 2016 (submission draft)	800 new homes per year 34 additional traveller pitches 30ha business park	Potential effects identified on the Ashdown Forest SAC/SPA. No adverse impact identified from traffic growth. Provision of SANG will mitigate recreational pressure on the SAC, such that the plan is unlikely either alone or in combination to have a significant impact	Yes, although note that this plan has not yet been through examination.
Wealden District Council	Core Strategy 2013	9400 homes between 2006 and 2027 32 additional traveller pitches 40,000sqm employment floorspace	Potential effects identified on Ashdown Forest SAC/SPA, Lewes Downs and Pevensy Levels SAC. Subject to adoption of mitigation measures, recreation and urbanisation effects on the Ashdown Forest, and surface water impacts on the Pevensy Levels could be overcome, in which case the Core Strategy would not alone or in combination have a significant effect on these sites	No
Surrey County Council	Surrey Waste Plan 2008	Identifies potential waste management sites in the borough – Earlswood Depot and Copyhold works	Possible effects identified on Natura 2000 sites from thermal processing emissions, traffic emissions, dust, land take, water discharge, pest and predators and litter. Concludes that proposed developments were unlikely to result in harmful impact and that the Plan would not have any alone or in-combination effects on European sites	No
	Surrey Minerals Plan 2011	Identifies Chilmead Farm as an area of search for silica sand extraction	Potential effect on SW London Waterbodies SPA can be mitigated. No adverse impact on the Mole Gap to Reigate Escarpment identified.	No
	Surrey	Identifies potential for	The Plan would not give rise to any significant effects on	No

	Aggregates Recycling Joint DPD 2013	waste management uses at Copyhold works, and aggregates depot at Salfords	the condition and integrity of Natura 2000 sites	
	Local Transport Plan 2014	Objective of securing reliable transport network and promoting sustainable transport options	The Plan would not give rise to any significant effects on the condition and integrity of Natura 2000 sites	Yes
Surrey Hills Area of Outstanding Natural Beauty	AONB Management Plan 2014	Includes policies in relation to activities in the AONB, including farming, recreation and tourism, land use planning and traffic and transport	Most plan objectives found to have either a positive or neutral effect on Natura 200 sites or were not applicable. Potential uncertain effects in relation to farming and recreation however these can be reconciled with appropriate management. The Plan would not therefore give rise to significant effects on the identified sites.	Yes

5.15 In the majority of instances there has been no change to the content of these plans since the Core Strategy was adopted

5.16 In those cases where new plans have been adopted, these include provision for mitigation and/or avoidance measures such that it has been concluded that the new plans will not have a likely significant effect on European sites or species.

### Screening assessment of emerging DMP objectives

- 5.17 A screening assessment of each proposed DMP objective, as set out in the consultation document, was carried out. The results of this assessment are included at **Annex 2**.
- 5.18 This screening assessment concluded that none of the objectives (on their own) directly result in activities or operations. Rather it is the ways in which these objectives are achieved that may generate activities or operations which could have effects on Natura 2000 sites. On their own, therefore, it is concluded that none of the objectives could have a likely significant effect on Natura 2000 sites
- 5.19 The screening assessment of objective also highlights that several of the objectives allow for the provision of measures in the DMP to avoid or mitigate the impact of development on the SAC.

### Screening assessment of DMP emerging policy approach

- 5.20 A screening assessment of each proposed policy approach in the DMP consultation document was carried out. The results of this assessment are included at **Annex 3**
- 5.21 Criteria based policies that guide the detailed design and siting of new development: The majority of policy approaches proposed are criteria-based policies to guide the detailed design of new development. These policy approaches do not directly have an impact on the scale or location of new development. They will not have a likely significant effect on Natura 2000 sites and have therefore been screened out.
- 5.22 Criteria based policies that have a positive effect in relation to European sites and species: A number of the policy approaches proposed will have a positive impact in relation to, or seek to safeguard, European sites and species. These policies – along with provision in the Core Strategy – will together ensure the any likely impact of new development on European sites and species will be avoided or mitigated. These proposed policy approaches have therefore been screened out.
- 5.23 Emerging policy approaches that relate to the scale or location of development: A number of the policy approaches proposed were identified as potentially relating to the scale or location of physical development or other activities or operations. For all but one proposed policy approach where activities or operations could directly result from the policy approach, the effects of the policy approach were identified as being small scale in relation to the effects arising from existing development, operations or activities, and/or a sufficient distance from any Natura 2000 site such that impact would be avoided. In all cases the proposed policy approaches are consistent with the framework for growth set out in the Core Strategy. For these policy approaches, therefore, no potential to affect any European site has been identified, and – taking into account avoidance and mitigation measures secured by other proposed policy approaches – it can be concluded that these proposed policy approaches would not have a likely significant effect on any European site.

- 5.24 One policy approach (OSR 3, relation to provision of new outdoor sports provision) was identified as having the potential to result in the removal of trees and hedgerows, which could impact on bat foraging and flight lines. However the policy also includes a criteria to ensure that any such development does not have any adverse effect on features of biodiversity value. Taking this potential avoidance/mitigation measure into account, it can be concluded that this proposed policy approach would not have a likely significant effect on any European site.
- 5.25 One proposed policy areas introduces the principle of potential development but does not define specific sites. This is in relation to Gypsy, Traveller and Travelling Showpeople accommodation provision. Were this type of development to be located on, or in very close proximity to, a Natura 2000 site, the screening assessment identifies that there could be an effect on that site. However, as at the moment no specific sites are proposed, and in conjunction with the proposed avoidance/mitigation measures in the Core Strategy and proposed elsewhere in the DMP consultation document, it can be concluded that these proposed policy approaches would not have any likely significant effect on any European site.
- 5.26 However it will be important that – once potential traveller sites have been identified these are subjected to a further HRA screening assessment.

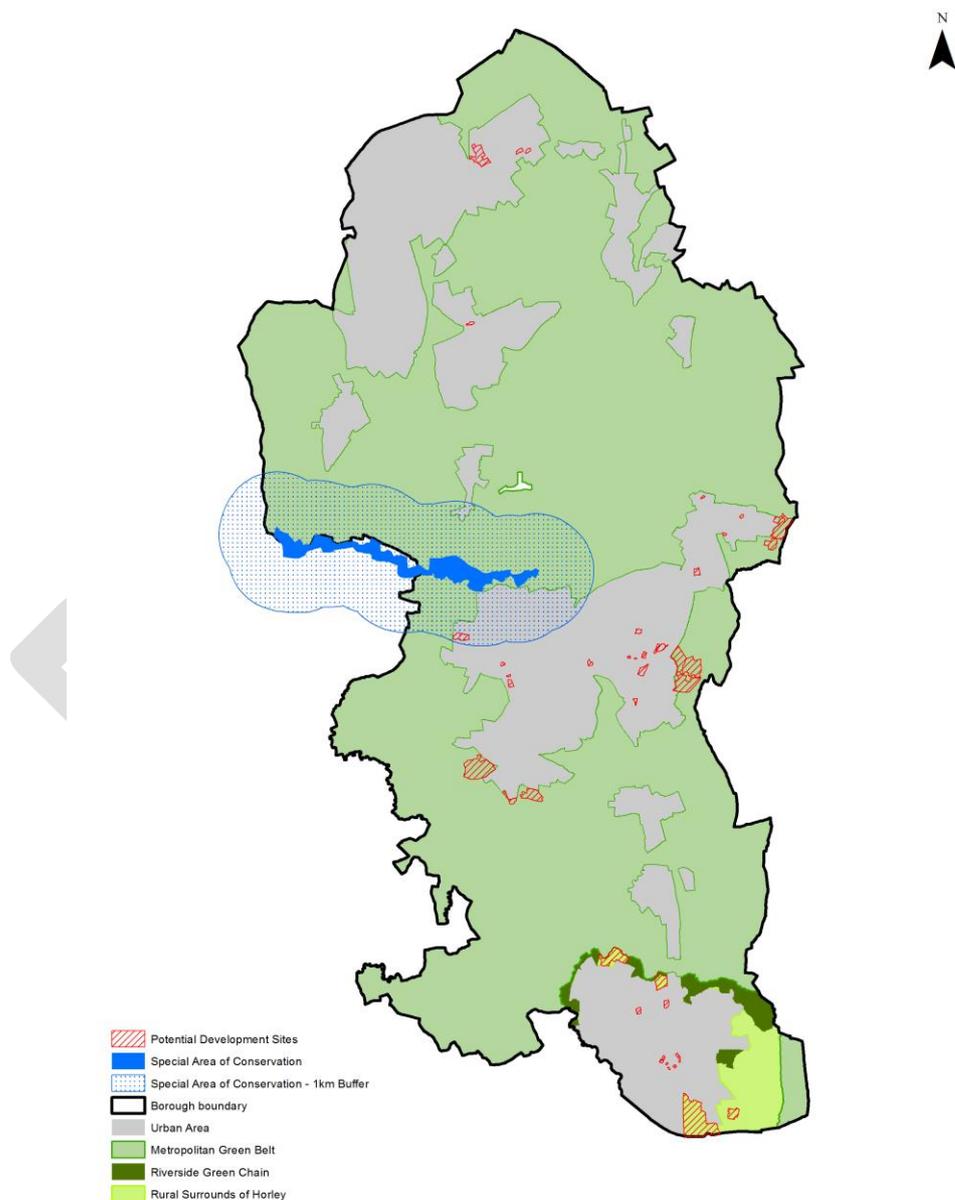
#### Screening assessment of DMP potential development site options

- 5.27 A screening assessment for each potential development site option in the DMP consultation document was carried out. The results of this assessment are included at **Annex 4**. It should be noted that the potential development sites included are options, rather than draft allocations.
- 5.28 Figure 8 shows the potential development site options in relation to the Mole Gap to Reigate Escarpment SAC.
- 5.29 This map illustrates that all but one potential development site options being considered fall outside the 1km SAC Impact Risk Zone.
- 5.30 The detailed assessment in the Annex also considers the scale and type of development proposed and the potential avoidance and mitigation measures incorporated within the Core Strategy and proposed DMP policy approaches.
- 5.31 One site falls within the 1km IRZ – Albert Road North. However this is a previously developed site within the urban area, and is separated from the SAC by the railway line, low density residential development and Green Belt. Potential new residential development on the site would be of a small scale in relation to the surrounding residential areas of Reigate, and there is no easy direct access from the site to the SAC, meaning that recreational impact arising from the new development is likely to be minimal. Redevelopment in this area would not obviously disrupt bat flight lines to foraging /roosting areas
- 5.32 A potential opportunity has been identified for a large scale employment development in the south of the borough. The site is approximately 10km from a Natura 2000 site. It has been concluded that new employment floorspace would not have a recreational impact on Natura 2000 sites, nor would it impact

via cessation of grazing of disturbance to roosting populations of Bechstein's bats. New employment floorspace would generate increased road traffic on the M23 and the wider road network, however this would be of a small scale compared to background levels of traffic.

5.33 Taking into account the scale of development compared to existing levels of population and development, the fact that the scale of development being proposed is consistent with that set out in the Core Strategy, and the proposed mitigation and avoidance measures, it can be concluded that none of the potential development site options would have a likely significant effect on any Natura 2000 site.

**Figure 8: Potential development site options in relation to the Mole Gap to Reigate Escarpment SAC**



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## Conclusions of DMP Regulation 18 Screening Assessment

- 5.34 The DMP consultation document does not, generally, seek to deliver development in a different manner – either in extent or location – to that set out in the adopted Core Strategy. The exception is the potential strategic employment development site identified to the south of Horley – whilst the Core Strategy identifies that strategic proposals for employment development may come forward in the future, it does not provide detail in terms of general location or scale.
- 5.35 The Core Strategy includes within it measures to avoid or mitigate the impact of new development on Natura 2000 sites, in particular policy CS2, which requires that any proposal for development that is likely to have a significant effect on the SAC, alone or in combination with other development, will be required to demonstrate that it will not adversely affect the integrity of the SAC. This policy would apply to any new development proposal.
- 5.36 The screening assessment undertaken for the DMP objectives, proposed policy approaches, and potential development site opportunities has concluded that the proposals within the DMP consultation document will not have any significant impacts, either alone or in combination with other plans, on the integrity of any European site or species.

## **6. Next Steps**

- 6.1 On the basis of the screening assessment conclusions, progression to a Stage 2 Appropriate Assessment is not required.
- 6.2 This HRA Screening Assessment will be kept under review as policies and site allocations for inclusion in the final draft DMP are developed.

## Annex 1: Summary of Natura 2000 sites within 15km of Reigate & Banstead borough

NAME OF SITE	SITE DESIGNATION STATUS	LOCAL AUTHORITY AREA	APPROX. DIST. FROM RBBC BOUNDARY (KM)	REASON FOR DESIGNATION/ KEY CHARACTERISTICS.
Mole Gap to Reigate Escarpment	SAC	Reigate and Banstead; Mole Valley	0 (within boundary)	<p>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.</p> <p>The Mole Gap is the only known outstanding locality in the United Kingdom of stable communities of Box woodland <i>Buxus sempervirens</i> 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 <i>Festuco-Brometalia</i>, important orchid sites and Yew <i>Taxus baccata</i> woodland. The site is also considered to support a significant presence of European dry heaths, beech forests <i>Asperulo-Fagetum</i>; Great Crested Newt <i>Triturus cristatus</i>; Bechstein's bat <i>Myotis bechsteini</i>.</p>
Ashdown Forest	SAC & SPA	Wealden	12.5	<p>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 <i>Caprimulgus europaeus</i>; 1.3% of the GB breeding population of Dartford Warbler <i>Sylvia undata</i>.</p>
Thames Basin Heaths	SPA	Elmbridge & Guildford	11.8	<p>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 <i>Caprimulgus europaeus</i>; 9.9% of the GB breeding population of Woodlark <i>Lullula arborea</i>; and 27.8% of the GB breeding population of Dartford Warbler <i>Sylvia undata</i>.</p>
South West London Water bodies	SPA & Ramsar Site	Elmbridge	13.3	<p>A series of reservoirs and former gravel pits that support internationally important populations of Shoveler Duck <i>Anas clypeata</i> (2.1% of the population of North-western/Central Europe); and Gadwall Duck <i>Anas strepera</i> (2.4% of the population of North-western Europe). As a Ramsar Site it also supports nationally important populations of Black-necked grebe <i>Podiceps nigricollis nigricollis</i> and Smew <i>Mergellus albellus</i> during the winter and nationally important populations of Great crested grebe <i>Podiceps cristatus cristatus</i>, Great cormorant <i>Phalacrocorax carbo carbo</i> and Tufted duck <i>Aythya fuligula</i> during the spring/ autumn.</p>
Richmond Park	SAC	Merton; Wandsworth; Richmond-upon-	9.4	<p>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 <i>Lucanus cervus</i>.</p>

NAME OF SITE	SITE DESIGNATION STATUS	LOCAL AUTHORITY AREA	APPROX. DIST. FROM RBBC BOUNDARY (KM)	REASON FOR DESIGNATION/ KEY CHARACTERISTICS.
		Thames.		
Wimbledon Common	SAC	Merton; Wandsworth; Richmond-upon-Thames.	9.4	The site is one of only four known outstanding localities in the United Kingdom for European stag beetle <i>Lucanus cervus</i> . The area is considered to support a significant presence for European dry heaths and Northern Atlantic wet heaths with cross-leaved heath <i>Erica tetralix</i> .

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## Annex 2: Screening Assessment of proposed DMP objectives

DMP objective	Likely activities / operations to result as a consequence of the proposal	Likely effects if proposal implemented	European sites potentially affected	Potential mitigation measures - if implemented would avoid likely significant effect	Could the proposal have a likely significant effects on European sites (taking mitigation into account)
PE1: Safeguard existing employment land and premises to ensure that there is adequate space for businesses to locate in the borough.	None directly: activities/operations will depend on policy approach and site allocations, which will be separately assessed for their potential to have significant effect on European sites	N/A	N/A	N/A	N/A
PE2: Provide flexibility for local businesses to start up, grow, diversify and prosper.				N/A	N/A
PE3: Help new development to deliver jobs and skills benefits for local people				N/A	N/A
PE4: Protect the vitality and viability of our town centre shopping areas				N/A	N/A
PE5: Protect the viability of smaller scale but vital local shopping areas				N/A	N/A
PE6: Ensure that both town and local centres are resilient and able to respond to future changes				N/A	N/A
SC1: To ensure that new development makes the best use of land whilst also being well designed and protecting and enhancing local character and distinctiveness	None directly: activities/operations will depend on policy approach and site allocations, which will be separately assessed for their potential to have significant effect on European sites	N/A	N/A	N/A	N/A
SC2: To ensure an appropriate mix of housing types and sizes, offering a good standard of living to future occupants				Use of housing standards including in relation to water efficiency will help contribute to minimising the need for groundwater abstraction which could have a negative impact on the SAC	N/A
SC3: To minimise the impacts of development, and the development process, on local residents and local amenity				N/A	N/A
SC4: Protect the most valuable open space within the urban areas				Protection of urban open space will ensure alternative local recreation opportunities are maintained, helping to relieve recreational pressure on the SAC	N/A
SC5: Encourage the provision of open space as part of new developments, and where appropriate new outdoor sport and recreation provision.	None directly: activities/operations will depend on policy approach and site allocations, which will be separately assessed for their potential to have significant effect on European sites	N/A	N/A	Provision of new open space as part of new developments will ensure alternative local recreation opportunities are provided, helping relieve recreational pressure on the SAC	N/A
SC6: Require new developments to provide adequate parking, whilst recognising the need to encourage sustainable transport choices, particularly in the most accessible locations				N/A	N/A
SC7: Ensure new developments are served by safe and well designed access for vehicles, pedestrians and cyclists				N/A	N/A
SC8: Encourage new development to incorporate passive and active energy measures and climate change resilience measures and renewable energy technologies				Passive and active climate change resilience measures have the potential to help to limit the environmental impact of new development, for example by increasing water efficiency and minimising the need for groundwater abstraction	N/A
SC9: Direct development away from areas at risk of flooding, and ensure all developments are safe from flood risk and do not increase flood risk elsewhere or result in a reduction in water quality				Managing flood risk and in particular water quality will help prevent groundwater pollution which could have negative impacts on the SAC	N/A

SC10: Ensure new development protects, and enhances wherever possible, the borough's landscapes and biodiversity interest features, providing the highest degree of protection to internationally and nationally designated areas.				Protection of the SAC is inherent within this objective, and the policy approach to protecting biodiversity is a key tool in avoiding impact and securing mitigation	N/A
SC11: Maximise the contribution of new development to a comprehensive green infrastructure network across the borough.				Provision of a comprehensive GI network across the borough will ensure that alternative recreation opportunities are available to residents, helping to relieve recreational pressure on the SAC. Maintenance of green corridors will help safeguard bat flight lines.	N/A
SC12: Control development in the Green Belt to safeguard its openness, and where possible enhance its beneficial use.	None directly: activities/operations will depend on policy approach and site allocations, which will be separately assessed for their potential to have significant effect on European sites	N/A	N/A	Controlling development in the Green Belt (which covers the SAC and much of the area surrounding the SAC) will help minimise impact from recreation, urbanisation effects, air pollution or groundwater pollution/abstraction.	N/A
SC13: Conserve and enhance designated heritage assets across the borough, supporting their continuing viable use and cultural benefits.				N/A	N/A
PS1: Identify a local target for gypsy, traveller and travelling showpeople sites, and allocate sites to achieve this target.	None directly: activities/operations will depend on policy approach and site allocations, which will be separately assessed for their potential to have significant effect on European sites	N/A	N/A	N/A	N/A
PS2: Ensure future cemetery and/or crematorium provision is located consistent with sustainability principles				N/A	N/A
PS3: Allocate sites for development across the borough consistent with the Core Strategy and sustainability principles				Consideration of sustainability principles in this objective should mean that avoidance and mitigation measures are considered as a central part of the site allocation process	N/A
PS4: Plan for improvements to existing infrastructure and services, and/or the provision of new infrastructure and services, to meet the needs created by new development.				Infrastructure could include infrastructure to avoid or mitigate the impacts of development on the SAC	N/A

### Annex 3: Screening assessment of proposed DMP policy approaches

DMP policy approach	Likely activities / operations to result as a consequence of the proposal	Likely effects if proposal implemented	European sites potentially affected	Potential mitigation measures - if implemented would avoid likely significant effect	Could the proposal have a likely significant effects on European sites (taking mitigation into account)
EMP1	The policy focuses on future industrial and commercial development proposals in existing employment locations	None. Relates to development in existing employment areas (eg the redevelopment of existing buildings), the nearest of which is 2.7km to the SAC. Highly unlikely to result in increased air pollution, recreational pressure or hydrological impact on the SAC.	No	Other DMP policy approaches seek to secure the implementation of mitigation measures, including DES1 (General design, including GI provision), NHE2 (biodiversity, making it clear that development that is likely to have a detrimental impact on the SAC will not be permitted), and NHE4 (Green infrastructure). Core Strategy policy requires proposals for development that is likely to have a significant effect on the SAC to demonstrate that it will not adversely affect the integrity of the site.	No
EMP2	The policy focuses on future employment generating uses in existing employment locations	None. Relates to development in existing employment areas. The identified local employment areas are located a considerable distance from the SAC.	No		No
EMP3	The policy focuses on future employment development outside employment areas.	None. Relates to new employment development. Whilst there is the potential for some of this new development to be within 1km of the SAC, the policy approach includes criteria to ensure that the type, scale and intensity of development is appropriate to the locality, and allows for the type and level of activity to be limited through conditions	No		No
EMP4	The policy may result in change of use some premises from employment to residential.	None. The policy is not spatial but seeks to safeguard land in employment use but recognises that in some cases this may not be viable. The policy would only be likely to result in a small scale increase in residential development over an above that that can be achieved via current permitted development.	No		Other DMP policy approaches seek to secure the implementation of mitigation measures alongside any changes of use, including DES1 (General design, including GI provision), NHE2 (biodiversity, making it clear that development that is likely to have a detrimental impact on the SAC will not be permitted), NHE3 (protecting trees, woodland areas and hedgerows) NHE4 (Green infrastructure); NHE5 (controlling the scale of development in the Green Belt). Core Strategy policy requires proposals for development that is likely to have a significant effect on the SAC to demonstrate that it will not adversely affect the integrity of the site.
EMP5	None identified – the policy approach relates to an existing designation being superseded by national/local policy approach	N/A	N/A	N/A	N/A
EMP6	None identified – the policy approach relates to an existing designation being superseded by national/local policy approach	N/A	N/A	N/A	N/A
EMP7	None identified – the policy approach relates to the design and siting of equipment not the principle of development	N/A	N/A	N/A	N/A
EMP8	None identified – the policy approach relates to skills provision rather than physical development	N/A	N/A	N/A	N/A
RET1	None identified - The policy guides the detailed design of development within existing town centres	N/A	N/A	N/A	N/A
RET2	The policy guides the future mix of town centre development within existing town centres. This could result in a small increase in retail floorspace and / or residential units in town centres and/or increased use of local centres by residents.	None. The policy relates to development within existing town centres. The nearest town centre to the SAC is Reigate, which is 1.1km from the SAC. Development intensification in Reigate town centre will be minimal compared with existing development in and around the town	No	Other DMP policy approaches seek to secure the implementation of mitigation measures, including DES1 (General design, including GI provision), NHE2 (biodiversity, making it clear that development that is likely to have a detrimental impact on the SAC will not be permitted), and NHE4 (Green infrastructure). Core Strategy policy requires proposals for development that is likely to have a significant effect on the SAC to demonstrate that it will not adversely affect the integrity of the site.	No
RET3	The policy guides the future mix of development within local centres. This could result in a small scale increase in residential development in local centres and/or increased use of local centres by residents.	None. The policy relates to small scale development only. Any increase in population from new residential units would be tiny when compared with existing levels of population.	No		No
RET4	The policy guides the future use of small local shopping parades and isolated shops. This could result in a small scale increase in residential development in these areas.	None. The policy relates to small scale development only. Any increase in population from new residential units would be tiny in when compared with existing levels of population.	No		No

RET5	None identified – The policy relates to the principle of temporary uses in existing retail units in town centres	N/A	N/A	N/A	N/A
RET6	The policy guides the location of retail, leisure and office development outside town centres. This policy could result in new retail, leisure or office development in the existing urban area.	None. The policy focuses these types of development in town centres as a priority, and requires impact assessments to demonstrate that proposals would not have a detrimental impact on town centre. This suggests that any proposals that are permitted would be of a smaller scale	No	Other DMP policy approaches seek to secure the implementation of mitigation measures, including DES1 (General design, including GI provision), NHE2 (biodiversity, making it clear that development that is likely to have a detrimental impact on the SAC will not be permitted), and NHE4 (Green infrastructure). Core Strategy policy requires proposals for development that is likely to have a significant effect on the SAC to demonstrate that it will not adversely affect the integrity of the site.	No
RET7	This policy guides future development in existing retail warehouse areas. It could result in an increase in intensification and thus more trips to these areas.	None. Relates to development in existing developed retail warehouse areas. Any intensification will be of a relatively small scale compared to background levels of development/traffic generation. The Redhill Retail Warehouse area lies about 2.5km from the SAC; the Reigate one just over 1km, separated by the railway line, Reigate Hill and areas of residential development	No		No
DES1	None identified – These policies guide the detailed design of development rather than the quantum, type or location of development.	N/A	N/A	This policy requires that new development contributes to the delivery of green infrastructure assets and networks	N/A
DES2				This policy requires the retention of mature trees and hedges, existing landscape features and the maintenance of green corridors	
DES3				This policy requires the retention and enhancement (using appropriate species) of existing tree cover, landscaping, green areas and other vegetation.	
DES4				N/A	
DES5				N/A	
DES6				This policy requires new development to meet the tighter water efficiency standards, which may help reduce the general requirement for groundwater abstraction by water companies	
DES7				N/A	
DES8				N/A	
DES9				This policy requires development to minimise the impact of air pollution, in particular having regard to sensitive habitats, and requiring appropriate mitigation where necessary	
DES10				N/A	
OSR1	None identified – This policy resists the development of open spaces within the urban area	N/A	N/A	N/A	N/A
OSR2	This policy requires the provision of new open space as part of new developments	Positive: New open space may provide localised recreation opportunities, potentially reducing recreational pressure on protected sites	N/A	This policy requires new development to provide local recreation space, which may reduce recreational pressure on the SAC	N/A
OSR3	This policy may result in the development of outdoor sport and recreation facilities.	Development could result in removal of trees and hedgerows	Bat foraging and flight lines	This policy includes a criteria to ensure that any such development does not have any adverse effect on features of nature conservation and biodiversity value	No
TAP1	None identified – This policy guides the detailed design of development rather than the quantum, type or location of development.	N/A	N/A	N/A	N/A

TAP2	None identified – This policy resists the development of airport car parking	N/A	N/A	N/A	N/A
CCF1	None identified – no policy proposed				
CCF2	This policy directs development away from areas at risk of flooding	None. The majority of the borough is not at risk of flooding, so there are many opportunities for development both outside areas of flood risk and in locations that will not have an effect on Natura 2000 sites.	No	Other DMP policy approaches seek to secure the implementation of mitigation measures, including DES1 (General design, including GI provision), NHE2 (biodiversity, making it clear that development that is likely to have a detrimental impact on the SAC will not be permitted), NHE4 (Green infrastructure), and NHE5 (controlling the scale of development in the Green Belt)	No
NHE1	The policy offers some support for small scale development in rural areas to support rural communities.	None. May result in small scale rural development, however not likely to be of a scale that has an effect on Natura 2000 sites	N/A	Other DMP policy approaches seek to secure the implementation of mitigation measures, including DES1 (General design, including GI provision), NHE2 (biodiversity, making it clear that development that is likely to have a detrimental impact on the SAC will not be permitted), NHE4 (Green infrastructure), and NHE5 (controlling the scale of development in the Green Belt). Core Strategy policy requires proposals for development that is likely to have a significant effect on the SAC to demonstrate that it will not adversely affect the integrity of the site.	No
NHE2	None identified – This policy relates to the protection and enhancement of biodiversity	Positive. This policy seeks to protect the SAC and support alternative recreation provision	N/A	This policy affords the SAC the highest level of protection, making it clear that development which is likely to have a detrimental effect on the SAC will not be permitted. It also supports the provision of measures to divert recreational pressure from the SAC.	N/A
NHE3	None identified – This policy relates to the protection of trees and woodland areas	Positive. This policy seeks to safeguard trees and woodland (including ancient woodland) and protect hedgerows.	N/A	This policy protects against the loss of ancient woodland, trees and hedgerows.	N/A
NHE4	None identified – This policy encourages the provision of green infrastructure	Positive. This policy requires that development proposals should avoid adverse impacts on existing habitats, and maintain links and corridors, including for biodiversity	N/A	This policy seeks to protect and enhance habitats and green networks/corridors.	N/A
NHE5	This policy offers some support for small scale development / redevelopment in areas of Green Belt.	None. May result in small scale extension to, or reuse of, buildings in the Green Belt, however not likely to be of a scale that has an effect on Natura 2000 sites.	No	Other DMP policy approaches seek to secure the implementation of mitigation measures, including DES1 (General design, including GI provision), NHE2 (biodiversity, making it clear that development that is likely to have a detrimental impact on the SAC will not be permitted), NHE4 (Green infrastructure), and NHE5 (controlling the scale of development in the Green Belt). Core Strategy policy requires proposals for development that is likely to have a significant effect on the SAC to demonstrate that it will not adversely affect the integrity of the site.	No
NHE6	This policy offers some support for small scale equestrian facilities in rural areas.	None. May result in small scale extension to existing buildings or slight intensification of use however not likely to be of a scale that has an effect on Natural 2000 sites	No		No
NHE7	None identified – Policy relates to minimising the impact of development on heritage assets	N/A	N/A	N/A	N/A
NHE8					
NHE9					
NHE10					
GTT1	This policy sets out potential sources of supply for traveller sites, to deliver – as far as possible – the level of need identified in the Core Strategy.	The likely effects cannot be fully assessed until specific sites have been identified. However, the need for additional pitches and plots in the borough arises from privately run sites within the borough. It is therefore likely that additional provision will be through a number of smaller scale sites or site extensions rather than larger sites. Sites in close proximity to a Natura 2000 site could result in effects from urbanisation and recreation impact. Provision of a site on a Natura 2000 site could result in physical degradation.	Mole Gap to Reigate Escarpment SAC	Other DMP policy approaches seek to secure the implementation of mitigation measures, including NHE2 (biodiversity, making it clear that development that is likely to have a detrimental impact on the SAC will not be permitted), and NHE5 (controlling the scale of development in the Green Belt). Core Strategy policy requires proposals for development that is likely to have a significant effect on the SAC to demonstrate that it will not adversely affect the integrity of the site.	No

CEM1	This policy provides criteria to guide the assessment of proposals for new cemetery and crematorium development. It could result in the provision of new facilities, most likely to be outside the urban area.	None, the policy includes a specific criterion to ensure that applications will only be supported where they would not have an unacceptable impact on biodiversity.	Mole Gap to Reigate Escarpment	Other DMP policy approaches seek to secure the implementation of mitigation measures, including NHE2 (biodiversity, making it clear that development that is likely to have a detrimental impact on the SAC will not be permitted), and NHE5 (controlling the scale of development in the Green Belt). Core Strategy policy requires proposals for development that is likely to have a significant effect on the SAC to demonstrate that it will not adversely affect the integrity of the site.	No
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## Annex x: Screening assessment of potential development site options

Potential development site option	Likely activities / operations to result as a consequence of the proposal	Likely effects if proposal implemented	European sites potentially affected	Potential mitigation measures - if implemented would avoid likely significant effect	Could the proposal have a likely significant effects on European sites (taking mitigation into account)
<b>Area 1: The North Downs</b>					
BAN1	Potential mixed use development in Banstead Town Centre, including up to 40 residential units	None. Site is approx. 7.5km from a Natural 20000 site. Potential scale of development is small in comparison with existing residential development in Banstead and in line with the Core Strategy.	No	Proposed DMP policy approaches seek to secure the implementation of mitigation measures, including DES1 (General design, including GI provision), NHE2 (biodiversity, making it clear that development that is likely to have a detrimental impact on the SAC will not be permitted), and NHE4 (Green infrastructure). Core Strategy policy requires proposals for development that is likely to have a significant effect on the SAC to demonstrate that it will not adversely affect the integrity of the site.	No
BAN2	Potential mixed use development in/adjoining Banstead Town Centre	None. Site is approx. 7.5km from a Natural 20000 site. Potential scale of development is small in comparison with existing residential development in Banstead and in line with the Core Strategy.			
BAN3	Potential mixed use development in Banstead Town Centre, including approx. residential units	None. Site is approx. 7.5km from a Natural 20000 site. Potential scale of development is small in comparison with existing residential development in Banstead and in line with the Core Strategy.	No		No
KBH1	Potential residential development in Kingswood of up to 35 units.	None. Site is approx. 4.3km from a Natura 2000 site. Potential scale of development is small in comparison with existing residential development in Kingswood and in line with the Core Strategy.	No		No
<b>Area 2a: Redhill and Merstham</b>					
RTC1	Potential mixed use development including up to 150 residential units in Redhill town centre	None. Site is approx. 2.4km from a Natura 2000 site. Potential scale of development is small in comparison with existing residential development in Redhill and in line with the Core Strategy	No	Proposed DMP policy approaches seek to secure the implementation of mitigation measures, including DES1 (General design, including GI provision), NHE2 (biodiversity, making it clear that development that is likely to have a detrimental impact on the SAC will not be permitted), and NHE4 (Green infrastructure). Core Strategy policy requires proposals for development that is likely to have a significant effect on the SAC to demonstrate that it will not adversely affect the integrity of the site.	No
RTC2	Potential mixed use development including up to 22 residential units in Redhill town centre	None. Site is approx. 2.4km from a Natura 2000 site. Potential scale of development is small in comparison with existing residential development in Redhill and in line with the Core Strategy.	No		No
RTC3	Potential mixed use development including up to 120 residential units in Redhill town centre	None. Site is approx. 2.4km from a Natura 2000 site. Potential scale of development is small in comparison with existing residential development in Redhill and in line with the Core Strategy	No		No
RTC4	Potential mixed use development including up to 80 residential units in Redhill town centre	None. Site is approx. 2.4km from a Natura 2000 site. Potential scale of development is small in comparison with existing residential development in Redhill and in line with the Core Strategy.	No		No
RTC5	Potential mixed use development including up to 20 residential units in Redhill town centre	None. Site is approx. 2.4km from a Natura 2000 site. Potential scale of development is small in comparison with existing residential development in Redhill and in line with the Core Strategy.	No		No
RTC6	Potential mixed use development including up to 60 residential units in Redhill town centre	None. Site is approx. 2.4km from a Natura 2000 site. Potential scale of development is small in comparison with existing residential development in Redhill and in line with the Core Strategy.	No		No
RED1	Potential residential development of up to 60 units in Redhill/Merstham	None. Site is approx. 2.9km from a Natura 2000 site. Potential scale of development is small in comparison with existing residential development in Redhill and in line with the Core Strategy.	No	Proposed DMP policy approaches seek to secure the implementation of mitigation measures, including DES1 (General design, including GI provision), NHE2 (biodiversity, making it clear that development that is likely to have a detrimental impact on the SAC will not be permitted), and NHE4 (Green infrastructure). Core Strategy policy requires proposals for development that is likely to have a significant effect on the SAC to demonstrate that it will not adversely affect the integrity of the site.	No
RED2	Potential residential development of up to 45 units in Merstham	None. Site is approx. 3.3km from a Natura 2000 site. Potential scale of development is small in comparison with existing residential development in Merstham and in line with the Core Strategy.	No		No
RED3	Potential residential development of up to 40 units in Redhill	None. Site is approx. 2.9km from a Natura 2000 site. Potential scale of development is small in comparison with existing residential development in Redhill and in line with the Core Strategy.	No		No
RED4	Potential residential development of up to 10 units in Merstham	None. Site is approx. 3.4km from a Natura 2000 site. Potential scale of development is small in comparison with existing residential development in Merstham and in line with the Core Strategy.	No		No

RED5	Potential residential development of up to 10 units in Merstham	None. Site is approx. 3.7km from a Natura 2000 site. Potential scale of development is small in comparison with existing residential development in Merstham and in line with the Core Strategy.	No		No
RED6	Potential residential development of up to 30 units in Merstham	None. Site is approx. 4.4km from a Natura 2000 site. Potential scale of development is small in comparison with existing residential development in Merstham and in line with the Core Strategy.	No		No
RED7	Potential residential development of up to 35 units or educational facility (primary school) between Redhill and Reigate	None. Site is approx. 1.85ha from a Natura 2000 site. Potential scale of development is small in comparison with existing development in Redhill/Reigate and in line with the Core Strategy.	No		
RED8	Potential mixed use development including up to 100 residential units in proximity to Redhill town centre	None. Site is approx. 2.4km from a Natura 2000 site. Potential scale of development is small in comparison with existing residential development in Redhill and in line with the Core Strategy.	No		
ERM1	Potential development of approx. 100 dwellings in Redhill	None. Site is approx. 3.1km from a Natura 2000 site. Potential scale of development is small in comparison with existing residential development in Redhill and in line with the Core Strategy. Site is separated from the SAC by the Redhill/Reigate conurbation.	No	Proposed DMP policy approaches seek to secure the implementation of mitigation measures, including DES1 (General design, including GI provision), NHE2 (biodiversity, making it clear that development that is likely to have a detrimental impact on the SAC will not be permitted), and NHE4 (Green infrastructure). Proposed design and mitigation measures include local green infrastructure enhancements. Core Strategy policy requires proposals for development that is likely to have a significant effect on the SAC to demonstrate that it will not adversely affect the integrity of the site.	No
ERM2	Potential development of approx. 75 dwellings in Redhill	None. Site is approx. 3.2km from a Natura 2000 site. Potential scale of development is small in comparison with existing residential development in Redhill and in line with the Core Strategy. Site is separated from the SAC by the Redhill/Reigate conurbation.	No		No
ERM3	Potential development of approx. 135 dwellings in Redhill	None. Site is approx. 3.1km from a Natura 2000 site. Potential scale of development is small in comparison with existing residential development in Redhill and in line with the Core Strategy. Site is separated from the SAC by the Redhill/Reigate conurbation.	No		No
ERM4	Potential development of approx. 55 dwellings in Merstham.	None. Site is approx. 4.3km from a Natura 2000 site. Potential scale of development is small in comparison with existing residential development in Merstham and in line with the Core Strategy. Site is separated from the SAC by the rest of Merstham and countryside at Gatton.	No		No
ERM5	Potential development of approx. 90 dwellings in Merstham.	None. Site is approx. 4.4km from a Natura 2000 site. Potential scale of development is small in comparison with existing residential development in Merstham and in line with the Core Strategy. Site is separated from the SAC by the rest of Merstham and countryside at Gatton.	No		No
<b>Area 2b: Reigate</b>					
REI1	Potential mixed use development including approx. 25 residential units in Reigate	None. Site is approx. 1.6km from a Natura 2000 site. Potential scale of development is small in comparison with existing residential development in Reigate and in line with the Core Strategy.	No	Proposed DMP policy approaches seek to secure the implementation of mitigation measures, including DES1 (General design, including GI provision), NHE2 (biodiversity, making it clear that development that is likely to have a detrimental impact on the SAC will not be permitted), and NHE4 (Green infrastructure). Core Strategy policy requires proposals for development that is likely to have a significant effect on the SAC to demonstrate that it will not adversely affect the integrity of the site.	No
REI2	Potential mixed use development including approx. 25 residential units in Reigate	None. Site is approx. 1.3km from a Natura 2000 site. Potential scale of development is small in comparison with existing retail / commercial development in Reigate and in line with the Core Strategy.	No		No
REI3	Potential mixed use development of replacement employment floorspace and up to 50 residential units in Reigate	None. Site is located just of 800m from the SAC, separated from the SAC by the railway line, low density residential development and Green Belt. The site is already in commercial and industrial use, and no increase in employment floorspace is envisaged. The potential scale of residential development is small in comparison with existing residential development in Reigate and is in line with the Core Strategy. Recreational impact would be limited as there is no easy direct access to the SAC. Redevelopment in this area would not obviously disrupt bat flight lines to foraging /roosting areas	No	Consultation document identifies the need for any future development to include measures to avoid impact on the SAC. Proposed DMP policy approaches seek to secure the implementation of mitigation measures, including DES1 (General design, including GI provision), NHE2 (biodiversity, making it clear that development that is likely to have a detrimental impact on the SAC will not be permitted), and NHE4 (Green infrastructure). Core Strategy policy requires proposals for development that is likely to have a significant effect on the SAC to demonstrate that it will not adversely affect the integrity of the site.	No
SSW2	Potential development of approx. 260 dwellings in Reigate.	None. Site is approx. 3km from a Natura 2000 site. Potential scale of development is small in comparison with existing residential development in Reigate and in line with the Core Strategy. Site is separated from the SAC by the rest of Reigate.	No	Proposed DMP policy approaches seek to secure the implementation of mitigation measures, including DES1 (General design, including GI provision), NHE2 (biodiversity, making it clear that development that is likely to have a detrimental impact on the SAC will not be permitted),	No

SSW7	Potential development of approx. 30 dwellings in Reigate.	None. Site is approx. 3.8km from a Natura 2000 site. Potential scale of development is small in comparison with existing residential development in Reigate and in line with the Core Strategy. Site is separated from the SAC by the rest of Reigate.	No	and NHE4 (Green infrastructure). Proposed design and mitigation measures include local green infrastructure enhancements. Core Strategy policy requires proposals for development that is likely to have a significant effect on the SAC to demonstrate that it will not adversely affect the integrity of the site.	No
SSW9	Potential development of approx. 100 dwellings in Reigate.	None. Site is approx. 3.8km from a Natura 2000 site. Potential scale of development is small in comparison with existing residential development in Reigate and in line with the Core Strategy. Site is separated from the SAC by the rest of Reigate.	No		No
<b>Area 3: The Low Weald</b>					
HOR1	Potential mixed use development including up to 30 residential units in Horley.	None. Site is approx. 9.5km from a Natura 2000 site. Potential scale of development is small in comparison with existing residential development in Horley and in line with the Core Strategy.	No	Proposed DMP policy approaches seek to secure the implementation of mitigation measures, including DES1 (General design, including GI provision), NHE2 (biodiversity, making it clear that development that is likely to have a detrimental impact on the SAC will not be permitted), and NHE4 (Green infrastructure). Core Strategy policy requires proposals for development that is likely to have a significant effect on the SAC to demonstrate that it will not adversely affect the integrity of the site	No
HOR2	Potential mixed use development including up to 30 residential units in Horley.	None. Site is approx. 9.5km from a Natura 2000 site. Potential scale of development is small in comparison with existing residential development in Horley and in line with the Core Strategy.	No		No
HOR3	Potential mixed use development including up to 20 residential units in Horley.	None. Site is approx. 9.5km from a Natura 2000 site. Potential scale of development is small in comparison with existing residential development in Horley and in line with the Core Strategy.	No		No
HOR4	Potential mixed use development including up to 15 residential units in Horley.	None. Site is approx. 9.5km from a Natura 2000 site. Potential scale of development is small in comparison with existing residential development in Horley and in line with the Core Strategy.	No		No
HOR5	Potential mixed use development including up to 35 residential units in Horley.	None. Site is approx. 9.5km from a Natura 2000 site. Potential scale of development is small in comparison with existing residential development in Horley and in line with the Core Strategy.	No		No
HOR6	Potential mixed use development including up to 25 residential units in Horley.	None. Site is approx. 9.5km from a Natura 2000 site. Potential scale of development is small in comparison with existing residential development in Horley and in line with the Core Strategy.	No		No
HOR7	Potential mixed use development including up to 30 residential units in Horley.	None. Site is approx. 9.5km from a Natura 2000 site. Potential scale of development is small in comparison with existing residential development in Horley and in line with the Core Strategy.	No		No
HOR8	Potential for up to 45 residential units in Horley	None. Site is approx. 8.2km from a Natura 2000 site. Potential scale of development is small in comparison with existing residential development in Horley and in line with the Core Strategy.	No		No
NWH1	Potential for approx. 75 residential units in Horley	None. Site is approx. 7km from a Natura 2000 site. Potential scale of development is small in comparison with existing residential development in Horley and in line with the Core Strategy.	No		Proposed DMP policy approaches seek to secure the implementation of mitigation measures, including DES1 (General design, including GI provision), NHE2 (biodiversity, making it clear that development that is likely to have a detrimental impact on the SAC will not be permitted), and NHE4 (Green infrastructure). Proposed design and mitigation measures include local green infrastructure enhancements.
NWH2	Potential for approx. 40 residential units in Horley	None. Site is approx. 7.6km from a Natura 2000 site. Potential scale of development is small in comparison with existing residential development in Horley and in line with the Core Strategy.	No	Core Strategy policy requires proposals for development that is likely to have a significant effect on the SAC to demonstrate that it will not adversely affect the integrity of the site.	No
SEH4	Potential for approx. 70 residential units in Horley	None. Site is approx. 10.2km from a Natura 2000 site. Potential scale of development is small in comparison with existing residential development in Horley and in line with the Core Strategy.	No		No
HOR9	Potential for new employment provision of up to 220,000sqm of business space and new public open space	None. Site is approx. 10km from a Natura 2000 site. New employment floorspace provision would generate increased road traffic on M23 however this would be of a small scale compared to background levels of traffic.	No	Core Strategy policy requires proposals for development that is likely to have a significant effect on the SAC to demonstrate that it will not adversely affect the integrity of the site.	No