



Development Management Plan: Main Modifications

Sustainability Appraisal Addendum

February 2019

Introduction and purpose

1. This technical note forms an Addendum to the Sustainability Appraisal (SA) for the Reigate & Banstead Development Management Plan (DMP) (Examination document CD3). **It should therefore be read in conjunction with CD3 and should not be read in isolation or considered as a standalone document.**
2. The Development Management Plan (DMP) was submitted to the Secretary of State on 19 May 2018 for independent examination. Following the hearing sessions, a number of main modifications to the DMP have been proposed, primarily through the Council's responses to Post Hearing Actions or the Inspector's Post Hearing Advice Note (ID/6). These main modifications have been identified as being likely to be necessary to make the plan "sound".
3. A full schedule of the proposed Main Modifications is available at: http://www.reigate-banstead.gov.uk/info/20381/emerging_planning_policy/888/development_management_plan. Hard copies will also be available at the Town Hall and at libraries within the borough during the forthcoming period of public consultation.
4. Any proposed Main Modifications which might give rise to significant sustainability effects need to be subject to SA (incorporating Strategic Environmental Assessment). The purpose of this Addendum is therefore to appraise the potential sustainability effects of proposed Main Modifications (MM) to the Development Management Plan (DMP). Specifically, the report:
 - a. Identifies each of the proposed Main Modifications
 - b. Screens them based on whether the modifications materially affect the findings of the previous SA (CD3) and/or whether they give rise to significant sustainability effects
 - c. Where a potential significant effect is identified as arising from a MM, reports the refreshed SA scoring and conclusions
5. Various Additional Modifications (AMs) to the DMP have also been identified by the Council. However, these changes are very minor, concerned with corrected errors (typographical or grammatical), addressing omissions, improving readability/legibility and/or providing greater clarity. AMs do not go to the "heart" of the plan, nor do they materially alter the thrust or intention of a particular policy. For this reason, these modifications are not considered to alter the findings of the previous SA (CD3). They are not therefore discussed in detail in this report.
6. The principle of carrying out an SA Addendum report in response to, and to resolve, matters arising from the examination process is established through case law in the judgement in Cogent Land LLP v Rochford District Council [2012] EWHC 2542.

Sustainability Appraisal process to date

7. The Council is legally required under both European and UK law to prepare a Sustainability Appraisal (SA) of the Development Management Plan (DMP) in order to help ensure that sustainability objectives including social, environmental and economic considerations are taken into account during all stages of the Plan preparation.
8. The iterative SA process has been integral to the development of the DMP, at each stage of the preparation of DMP. This has included the preparation of a series of SA documents and these SA's listed below support the information contained in this note:
 - Regulation 19 Sustainability Appraisal (May 2018) (CD3): http://www.reigate-banstead.gov.uk/downloads/file/4654/cd3_-_regulation_19_sustainability_appraisal
 - SA/SEA Scoping Report (June 2017): http://www.reigate-banstead.gov.uk/downloads/download/1197/sustainability_appraisal_scoping_report_june_2017

- Development Management Plan (Regulation 18 Stage) Sustainability Appraisal Main Report (June 2016) (CD10 (a)-(f)): http://www.reigate-banstead.gov.uk/info/20381/emerging_planning_policy/761/dmp_-_evidence

Appraisal of the proposed Main Modifications

9. As above, the focus of the appraisal is on the proposed modifications (given that it is the proposed modifications that are the focus of forthcoming consultation); however, consideration is also given to the effects of the DMP as modified (i.e. the cumulative effects of the proposed modifications and the rest of the DMP as submitted).
10. With regard to compliance with legislative and policy requirements, this SA Addendum Report comprises a further part of the submission SA Report (CD3) - and has been prepared in accordance with relevant guidance and legislative requirements. It has also followed the same assessment and appraisal methodology which is described in CD3 to ensure consistency between the two.
11. Every effort is made to predict potential effects accurately; however, this is inherently challenging given the high level nature of some of the policy approaches under consideration, and understanding of the baseline. There is inevitably a need to make assumptions and professional judgements, e.g. in relation to plan implementation and aspects of the baseline that might be impacted.
12. The Addendum follows a two-stage process:
 - In the first instance, each of the Main Modifications is subject to a “screening” to determine whether they are likely to materially affect the conclusions previously reached in CD3 and/or otherwise give rise to potential significant environmental effects.
 - Where a potential change in the scoring in CD3 is identified and/or some other potential significant environmental effect is identified, a full re-appraisal of the policy or allocation in question is undertaken in accordance with the objectives, detailed methodology and matrix approach set out in CD3.
13. In terms of headlines, as the table below identifies, it is judged that the majority of the 35 ‘Main Modificatons’ can be ‘screened-out’ from the SA Addendum (i.e. they would not have a material effect on previous conclusions/scoring and thus do not need to be subject to re-appraisal). This is primarily because, whilst they represent changes to policy text, they do not constitute a fundamental change in ‘policy direction’ or approach. In addition, as explained above, all additional (minor) modifications have been screened out.
14. Table 1 below discusses each of the 35 proposed main modifications and indicates which ones have been ‘screened-in’ for the purposes of SA and the rationale for the decision taken. Where the modification is considered to give rise to a change in scoring, revised appraisal matrices have been prepared and these are included in Appendix 1.

Table 1: Screening the ‘Main Modifications’ for the purposes of SA

| Mod No. | Policy/ Explanation/ Paragraph/ Annex | Summary of proposed Modification(s) | Screened in to SA? | Rationale/Explanation |
|---|--|---|---------------------------|---|
| Policy Context for Policies EMP1 – EMP4 | | | | |
| MM1 | Paragraph 2.2.5 (p.12) | Add new paragraph clarifying how employment needs will be met, including which allocations within the DMP are expected to contribute | No | The additional wording explains how delivery of additional employment floorspace will be achieved during the plan period. The wording provides clarity and does not constitute a change in policy approach. It does not therefore alter the conclusions of the SA nor give rise to significant sustainability effects. |
| Policy EMP5: Safeguarding employment land and premises | | | | |
| MM2 | Policy EMP5 (p.17) | Revise the wording of EMP5 in its entirety reflecting more flexible approach. | No | These changes maintain a requirement to secure employment and skills training from new developments for the benefit of local residents. The overarching policy approach is therefore unchanged; however, the changes provide greater flexibility as to how this is achieved. The modification does not constitute a change in policy approach. It does not therefore alter the conclusions of the SA nor give rise to significant sustainability effects. |
| Policy DES2: Residential garden land development | | | | |
| MM3 | Policy DES2 (p.31) | Amend policy wording to provide clarity of approach to design/character | No | The changes maintain a focus on ensuring that developments are responsive to the character of the area whilst enabling the decision-taker to exercise judgement on a case by case basis. The modification does not constitute a change in overall policy approach. It does not therefore alter the conclusions of the SA nor give rise to significant sustainability effects. |
| Policy DES4: Housing mix | | | | |
| MM4 | Policy DES4 explanation (p.34) | Additional wording to reference the Affordable Housing SPD | No | The additional wording explains the role of supplementary guidance in supporting the application of the policy in relation to affordable housing. The wording provides clarity and does not constitute a change in policy approach. It does not therefore alter the conclusions of the SA nor give rise to significant sustainability effects. |
| Policy DES6: Affordable housing | | | | |
| MM5 | Policy DES6 (p.35) and explanation (p.36) | Amend policy wording to remove requirement for financial contributions on small sites (under 11 units). Additional wording changes for clarity of approach. | Yes | The changes represent a shift in policy approach through the removal of potential financial contributions for affordable housing from small sites. |

| Mod No. | Policy/ Explanation/ Paragraph/ Annex | Summary of proposed Modification(s) | Screened in to SA? | Rationale/Explanation |
|--|---------------------------------------|--|--------------------|--|
| | | | | <p>CD3 did not specifically appraise inclusion or exclusion of a small sites contribution. Whilst the removal of small sites contributions would be likely to result in a less positive effect on affordable housing provision, it may conversely have a more positive effect on the supply of housing overall since it will reduce the financial burden on the deliverability of small sites (particularly more marginal urban sites). On this basis, it is concluded that the modified policy would still have a net positive effect on the supply of housing. The modification does not therefore significantly alter the conclusions of the SA nor give rise to significant sustainability effects</p> |
| Policy DES7: Specialist Housing | | | | |
| MM5 | Policy DES7 (p.37-37) | Various amendments to policy wording to provide clarity of approach. | No | <p>These changes in wording in relation to caravans and older persons housing seek to provide greater clarity as to the application and interpretation of the policy. The overarching policy approach of supporting a range of housing types to meet the needs of those with specific accommodation requirements is unchanged. The modification does not constitute a change in policy approach. It does not therefore alter the conclusions of the SA nor give rise to significant sustainability effects.</p> |
| Policy DES10: Advertisements & Shopfront design | | | | |
| MM7 | Policy DES10 (p.42) | Delete criteria (5) relating to specific illuminated advertisements. | No | <p>This deletion relates to the permission requirements of advertisements. Whilst it is less specific in terms of explicitly restricting a specific type of advertisements, other aspects of the policy would retain adequate protection to ensure that advertisements do not harm sensitive heritage or landscape character. The modification does not constitute a change in policy approach. It does not therefore alter the conclusions of the SA nor give rise to significant sustainability effects.</p> |
| Policy OSR2: Open space in new developments | | | | |
| MM8 | Policy OSR2 (p.46) | Amend wording of criteria (1) and (4) to provide greater clarity as to the requirements for open space on different scales of development. | No | <p>These changes clarify when different open space requirements will apply. The overall requirement to provide open space and the standards are unchanged. The modification does not constitute a change in policy approach. It does not therefore alter the conclusions of the SA nor give rise to significant sustainability effects.</p> |

| Mod No. | Policy/ Explanation/ Paragraph/ Annex | Summary of proposed Modification(s) | Screened in to SA? | Rationale/Explanation |
|---|---------------------------------------|---|--------------------|---|
| Policy OSR3: Outdoor sport and recreation | | | | |
| MM9 | Policy OSR3 (3) | Amend wording of criteria (3) to provide clarity in relation to Green Belt | No | These changes provide clarity of approach and ensure consistency with the wording of national policy. The modification does not constitute a change in overall policy approach which still seeks to ensure appropriate development in the Green Belt. It does not therefore alter the conclusions of the SA nor give rise to significant sustainability effects. |
| Policy TAP1: Access, parking and servicing | | | | |
| MM10 | Policy TAP1 (1) c) and (2) (p.49) | Amend wording of criteria (1) (c) and (2) to clarify approach to parking standards and reflect national policy. | No | These changes relate to the interpretation of car parking and cycle storage and impacts of development on transport. The overall parking standards remain unchanged and the modification strengthens the requirement for clear evidence to justify departure from the specified standards. The modification does not constitute a change in policy approach. It does not therefore alter the conclusions of the SA nor give rise to significant sustainability effects. |
| Policy CCF1: Climate change mitigation | | | | |
| MM11 | Policy CCF1 (3) (p.52) | Revised criterion (3) in relation to micro-generation | No | The proposed replacement wording provides a clearer expression of the Council's position in relation to inclusion of micro-generation on new developments. The modification does not constitute a change in policy approach. It does not therefore alter the conclusions of the SA nor give rise to significant sustainability effects. |
| Policy CCF2: Flood risk | | | | |
| MM12 | Policy CCF2 (1) and (3) (p.53) | Amend wording of criteria (1) and (3) to ensure clarity of approach in relation to application of sequential/exceptions tests and to ensure consistency with national policy. | No | These wording changes clarify the applicability of the sequential and exceptions tests. The overarching approach of the policy to avoid development in areas at risk of flooding unless robustly justified and/or provide adequate mitigation remains. The modification does not constitute a change in policy approach. It does not therefore alter the conclusions of the SA nor give rise to significant sustainability effects. |
| Policy NHE1: Landscape protection | | | | |
| MM13 | Policy NHE1 (p.57) | Various amendments to policy wording, notably in relation to the approach to development in the AONB and AGLV. | Yes | These wording changes represent a stronger, more proactive approach to landscape management and enhancement in the AONB/AGLV, ensuring consistency with national policy and the adopted Core Strategy. The overarching policy approach of |

| Mod No. | Policy/ Explanation/ Paragraph/ Annex | Summary of proposed Modification(s) | Screened in to SA? | Rationale/Explanation |
|--|--|--|--------------------|--|
| | | | | preserving landscape character would be strengthened and the modifications would likely reinforce the existing significant positive impacts identified against objective 15 in CD3. On this basis, it is concluded that the proposal would still have a net positive effect on sustainability and does not therefore significantly alter the overall conclusions of the SA in relation to this policy. |
| Policy NHE2: Protecting and enhancing biodiversity and areas of geological importance | | | | |
| MM14 | Policy NHE2(1) (p.58) and explanation (p.59) | Additional wording after Policy NHE2 (1) (b) in relation to consideration of specific impact on Bechstein's Bats. Additional related paragraph at end of explanatory text. | Yes | The changes introduce an additional specific policy requirement in relation to a protected species as a result of HRA recommendations. The additional policy requirement would strengthen the significant positive effects already identified in relation to natural resources (objective 9) and biodiversity (objective 16). On this basis, it is concluded that the proposal would still have a net positive effect on sustainability and does not therefore significantly alter the overall conclusions of the SA in relation to this policy. |
| Policy NHE3: Protecting trees, woodland areas and natural habitats | | | | |
| MM15 | Policy NHE3 (p.60) and explanation (p.61) | Additional bullet in Policy NHE3 to reference Bechstein's Bat habitat areas. Additional related paragraph at end of explanatory text. | Yes | The changes introduce an additional specific policy requirement in relation to a protected species as a result of HRA recommendations. The modification would strengthen consideration of biodiversity and protected species. Re-appraisal of the modified policy concludes that it would give rise to a more positive effect than previously identified in relation to biodiversity (objective 16) and thus represents a positive enhancement in overall sustainability. The revised scoring matrix is included at Appendix 1. |
| Policy NHE4: Green and blue infrastructure | | | | |
| MM16 | Policy NHE4 (3) (p.62) | Amend wording of criteria (3)b) to Policy NHE4 to remove exclusion in relation to horse keeping | No | The wording changes reflects removal of a specific exclusion relating to equestrian uses in the Riverside Green Chain. The overall policy approach of promoting the RGC for multi-functional recreational, biodiversity, flooding, cultural and sustainable transport benefits remains. The modification does not constitute a change in policy approach. It does not therefore alter the conclusions of the SA nor give rise to significant sustainability effects. |

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|---|---------------------------------------|--|--------------------|---|
| Policy NHE5: Development within the Green Belt | | | | |
| MM17 | Policy NHE5 (1) and (4) | Amend wording of criteria (1) in relation to the base date for original buildings and amend criteria (4) to clarify removals/additions to Green Belt | No | The change to the base date is for clarity and to ensure consistency with the definition in national policy, the overall base year of 1948 is unchanged. The additional wording in relation to releases and additions to the Green Belt for SUEs and traveller sites is for clarity and internal consistency within the document: these changes are already referenced elsewhere within the plan and its policies and these changes ensure that this is consistently acknowledged throughout the document. The modifications do not constitute a change in policy approach and do not therefore alter the conclusions of the SA nor give rise to significant sustainability effects. |
| Policy NHE6: Reuse and adaptation of buildings in the Green Belt and the Rural Surrounds of Horley | | | | |
| MM18 | Policy NHE6 (p.66) | Amend wording of NHE6 to provide additional requirements in relation to character when re-using building in the Green Belt. | Yes | The wording changes introduce greater protection for rural landscape character in the conversion of rural buildings, whilst also providing a more flexible approach by not requiring buildings to lay vacant before they can be converted. Whilst the greater protections for character may restrict re-use of a limited number of buildings, other policies in the Plan would impose similar requirements. On the converse, the removal of the vacancy requirement would enable rural buildings/sites to be re-used for beneficial development more promptly, thus reinforcing the significant positive effects on re-use of previously developed sites previously identified in CD3. Overall, the modification does not therefore significantly alter the overall conclusions of the SA in relation to this policy. |
| Policy NHE7: Rural Surrounds of Horley | | | | |
| MM19 | Policy NHE7 (p.66) | Amend wording of Policy NHE7 to provide clarity as to the approach to new dwellings in the Rural Surrounds and reflect national policy in relation to countryside development. | No | These changes provide greater clarity to how proposals for new dwellings will be assessed and ensure consistency with national policy. The overarching policy approach is therefore unchanged. It does not therefore alter the conclusions of the SA nor give rise to significant sustainability effects. |

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|--|---------------------------------------|--|--------------------|---|
| Policy NHE8: Horse keeping and equestrian development | | | | |
| MM20 | Policy NHE8 (p.67) | Amend wording of criteria (1) a) to Policy NHE8 to provide consistency of terminology with national policy | No | The proposed wording change provides greater clarity to avoid potential confusion of imputing GB openness terminology onto the wider countryside. The modification does not constitute a change in policy approach of supporting equestrian development of an appropriate scale where it would preserve character. It does not therefore alter the conclusions of the SA nor give rise to significant sustainability effects. |
| Policy NHE9: Heritage assets | | | | |
| MM21 | Policy NHE9 (p 68 – 69) | Various amendments to wording of Policy NHE9 to provide greater clarity of approach and consistency with national policy. | No | These changes provide greater clarity to how proposals affecting different heritage assets will be assessed and ensure consistency with national policy. The overarching policy approach of preserving built and archaeological heritage remains. It does not therefore alter the conclusions of the SA nor give rise to significant sustainability effects. |
| Policy GTT1: Gypsy, Traveller and Travelling Showpeople accommodation | | | | |
| MM22 | Policy GTT1 (p.74-77) | Re-word Policy GTT1 to provide greater clarity of approach to delivery of traveller accommodation, including protection of existing/allocated sites. Revisions to allocations including increased number of pitches on several, one additional site (G11) and one site allocation which has been increased in site area (G12) | | The changes represent a clear shift in policy approach, designed to more fully address the needs for traveller accommodation. The modified policy approach is considered to have more positive effects in terms of providing sufficient housing suitable to residents needs since it provides additional pitch capacity which would fully meet identified requirements. The additional safeguards in relation to existing and allocated traveller sites being retained for this sole purpose will further support this aim. The revised scoring matrix is included at Appendix 1. In terms of individual site allocations, increased capacities extending beyond those originally appraised through CD3 have been proposed on some sites (G3 and G4) and the boundary of G12 has been revised to include a larger area. Each of these sites has been re-appraised based on the revised capacities/areas and these are not considered to have significant sustainability effects subject to inclusion of the mitigation measures specified within the policy requirements. These matrices are included at Appendix 1. |

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| | | | | <p>With regard to the amended allocation for G11, Although this site was originally appraised in the SA (CD3) it was not taken forward as an allocation for unrelated reasons. It is now proposed to be included as an allocation following additional landscape work and the capacity proposed through the Main Modification to include the site as an allocation is consistent with that previously appraised through CD3. The overall conclusions of CD3 in relation to this policy are therefore considered robust with mitigation in relation to landscape impacts included in the policy as advised in CD3.</p> <p>Overall, the combined modifications to GTT1 and the various individual site allocations within it are considered to have a more positive effect on Objective 1 in relation to supply of housing suited to residents needs. The modifications do not give rise to any additional negative impacts subject to appropriate mitigation.</p> |
| Policy BAN2: The Horseshoe, Banstead | | | | |
| MM23 | Policy BAN2: Requirements (p.88) | Additional requirement in relation to consultation with utilities provides in relation to wastewater capacity | No | The modification provides clarity as to the potential infrastructure considerations relating to the site in response to consultation responses from utilities providers. The need to consider these issues would arise from other policies in the plan (e.g. INF1); this modification simply provides clarity as to the issues on this site. The change does not therefore represent a shift in policy approach or additional burden on development. It does not therefore alter the conclusions of the SA nor give rise to significant sustainability effects. |
| Policy RTC4: Colebrook, Redhill | | | | |
| MM24 | Policy RTC4: Requirements (p.96) | Amend requirement in relation to flooding, including specific requirement to submit Flood Risk Assessment | No | This addition reflects consistency with the requirements of other thematic policies in the DMP on flood risk (CCF2). The change is therefore for consistency and clarity and does not represent a change in policy approach. It does not therefore alter the conclusions of the SA nor give rise to significant sustainability effects. |

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|--|--|---|--------------------|--|
| Policy RED4: Church of Epiphany, Merstham | | | | |
| MM25 | Policy RED4: Requirements (p.100) | Amend requirement in relation to surface water flooding. | No | This addition reflects consistency with the requirements of other thematic policies in the DMP on flood risk (CCF2). The change is therefore for consistency and clarity and does not represent a change in policy approach. It does not therefore alter the conclusions of the SA nor give rise to significant sustainability effects. |
| Policy RED5: Merstham Library, Merstham | | | | |
| MM26 | Policy RED5: Requirements (p.101) | Amend requirement in relation to flooding, including specific requirement to submit Flood Risk Assessment | No | This addition reflects consistency with the requirements of other thematic policies in the DMP on flood risk (CCF2). The change is therefore for consistency and clarity and does not represent a change in policy approach. It does not therefore alter the conclusions of the SA nor give rise to significant sustainability effects. |
| Policy RED8: Reading Arch Road, Redhill | | | | |
| MM27 | Policy RED8: Requirements (p.103) | Amend requirement in relation to flooding, including specific requirement to submit Flood Risk Assessment | No | This addition reflects consistency with the requirements of other thematic policies in the DMP on flood risk (CCF2). The change is therefore for consistency and clarity and does not represent a change in policy approach. It does not therefore alter the conclusions of the SA nor give rise to significant sustainability effects. |
| Policy RED9: East Surrey Hospital | | | | |
| MM28 | Policy RED9: Allocation (p.105) and Requirements (p.105-106) | Amend site boundary to included increased land area. Amend requirements to include measures to protect existing tree belts and ancient woodlands. Amend uses to provide clarity as to type of development contemplated. Additional requirement in relation to consultation with utilities provides in relation to wastewater capacity | Yes | The increased site area is considered potentially material as the increased site area would incorporate an area of woodland which forms part of the hospital complex. However, the modifications also incorporate stronger and clearer mitigation to the effect that existing woodland should be protected and enhanced, with appropriate buffer zones; subject to this mitigation increasing the site area would not give rise to negative or differential impacts compared to the previous conclusions in CD3 and may actually offer opportunity to bring the woodland under more formal positive management as part of a master-planned approach to any growth on the site would support this. The changes to the proposed uses do not represent a change in policy approach but provide greater clarity as to what is considered acceptable. The modification in relation to wastewater infrastructure provides clarity as to the issued which would arise on this site from other policies in the plan (notably INF1). On this basis, it is concluded |

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| | | | | that the policy overall would still have a net positive effect on sustainability and does not therefore significantly alter the overall conclusions of the SA in relation to this policy. |
| Policy ERM1: Land at Hillsbrow | | | | |
| MM29 | Policy ERM1: Allocation (p.107) and Requirements: (p.108) | Amend allocation text to increase dwelling yield and add additional transport infrastructure requirements | No | Whilst this change proposes an increase in the capacity of the site (from approximately 100 to approximately 145 homes including at least one traveller pitch), the capacity remains within the scope of the submission SA (CD3) which was appraised based on a range from 113 to 216 homes. The inclusion of a requirement for a Transport Assessment is for clarity and would be required under other policies in the Plan at any rate, this does not therefore represent a change in policy approach. Subject to the previously identified mitigation, the modifications do not therefore alter the conclusions of the SA nor give rise to significant sustainability effects. |
| Policy ERM2/3: Land west of Copyhold Works and Former Copyhold Works | | | | |
| MM30 | Policy ERM2/3 Allocation: (p.109) | Amend allocation text to increase dwelling yield and add additional mitigation requirements in respect of future relationship to the adjoining landfill. Modify wording in relation to land for school. Requirement for traveller provision included within allocation to ensure consistency with GTT1. | No | Whilst this change proposes an increase in the capacity (from approximately 210 to approximately 230 homes including traveller pitches), the capacity remains within the scope of the submission SA (CD3) which was appraised based on a range from 171 to 340 homes (across ERM2 and ERM3). The modifications reflect a strengthening of the requirements in relation to mitigation for pollution/contamination to ensure a satisfactory two way relationship between housing and the landfill, these mitigation requirements were already identified as necessary in the submission SA. The modified wording in relation to the provision of a school site would still ensure that this infrastructure is provided if it remains necessary to do so but would provide flexibility to make use of the land for other purposes if infrastructure is not required; thus potentially supporting greater contribution to housing needs. The additional wording in relation to traveller provision reflects requirements elsewhere in the Plan and is not therefore a fundamental change in policy approach. Subject to the previously identified mitigation, the modifications do not therefore alter the conclusions of the SA nor give rise to significant sustainability effects. |

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|--|--|---|--------------------|--|
| Policy ERM4b: Land south of Bletchingley Road | | | | |
| MM31 | ERM4b Allocation: (p.113) | Amend allocation text to increase dwelling yield | No | Whilst this change proposes an increase in the capacity (from approximately 20 to approximately 30 the capacity remains within the scope of the submission SA (CD3) which was appraised based on a range from 81 to 163 units including the adjoining site (ERM4a). Subject to the previously identified mitigation, the modifications do not therefore alter the conclusions of the SA nor give rise to significant sustainability effects. |
| Policy ERM5: Oakley Farm, off Bletchingley Road, Merstham | | | | |
| MM32 | ERM5 Allocation: (p.115) and Requirements: (p.116) | Amend allocation text to increase dwelling yield. Requirement for traveller provision included within allocation to ensure consistency with GTT1. | No | Whilst this change proposes an increase in the capacity (from approximately 95 to approximately 130 homes including traveller pitches), the capacity remains within the scope of the submission SA (CD3) which was appraised based on a range from 100 to 200 homes (across ERM2 and ERM3). The additional wording in relation to traveller provision reflects requirements elsewhere in the Plan and is not therefore a fundamental change in policy approach. Subject to the previously identified mitigation, the modifications do not therefore alter the conclusions of the SA nor give rise to significant sustainability effects. |
| Policy RE11: Library and Pool House, Reigate | | | | |
| MM33 | Policy RE11: Requirements (p.120) | Amend requirement in relation to flooding, including specific requirement to submit Flood Risk Assessment | No | This addition reflects consistency with the requirements of other thematic policies in the DMP on flood risk (CCF2). The change is therefore for consistency and clarity and does not represent a change in policy approach. It does not therefore alter the conclusions of the SA nor give rise to significant sustainability effects. |
| Policy SSW2: Land at Sandcross Lane | | | | |
| MM34 | SSW2 Allocation: (p.122) and Requirements (p.123) | Amend site boundary to include increased land area. Amend allocation text to increase dwelling yield. Modify wording in relation to land for health facilities. Requirement for traveller provision included within allocation to ensure consistency with GTT1. Greater specificity | No | Whilst this change proposes an increase in the capacity (from approximately 260 to approximately 290 homes including traveller pitches), the capacity remains within the scope of the submission SA (CD3) which was appraised based on a range from 233 to 310 homes. The additional wording in relation to traveller provision reflects requirements elsewhere in the Plan and is not therefore a fundamental change in policy approach. The increased site area |

| Mod No. | Policy/ Explanation/ Paragraph/ Annex | Summary of proposed Modification(s) | Screened in to SA? | Rationale/Explanation |
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| | | in relation to likely highway infrastructure improvements. | | takes in a community facility (Scout Hut); however, other policies in the plan would ensure that this would be protected. The modified wording in relation to the provision of health facilities would still ensure that this infrastructure is provided if it remains necessary to do so but would provide flexibility to make use of the land for other purposes if infrastructure is not required; thus potentially supporting greater contribution to housing needs. Subject to the previously identified mitigation, the modifications do not therefore alter the conclusions of the SA nor give rise to significant sustainability effects. |
| Policy SSW6: Land west of Castle Drive | | | | |
| MM35 | SSW6 Allocation: (p.124) and Requirements (p.124) | Correction of site area and removal of specific requirement for formal on-site public open space/play facilities to address inconsistency with OSR1. | No | The revision to the site area is a factual correction. The removal of the requirement for formal open space/play space addresses an inconsistency with other policies in the Plan (OSR1) given the small size of the site. Whilst provision of alternative sports facilities were identified as mitigation in the SA (CD3), this assessment related to a larger site comprising the adjoining playing fields. The removal of the open space requirement does not therefore alter the conclusions of the SA nor give rise to significant sustainability effects. |
| Policy SSW7: Hartwood Nursery | | | | |
| MM36 | SSW7 Requirements: (p.125) | Additional requirement relating to need for a site specific flood risk assessment. | No | This addition reflects consistency with the requirements of other thematic policies in the DMP on flood risk (CCF2). The change is therefore for consistency and clarity and does not represent a change in policy approach. It does not therefore alter the conclusions of the SA nor give rise to significant sustainability effects. |
| Policy SSW9: Land at Dovers Farm | | | | |
| MM37 | SSW9 Allocation: (p.128) | Amend allocation text to increase dwelling yield. Requirement for traveller provision included within allocation to ensure consistency with GTT1. Additional requirement for submission of a Flood Risk Assessment. | Yes | The proposed increased capacity (to 120 homes), exceeds the capacity previously referred to in the SA (CD3) for this site which was appraised on the basis of 108 homes. The site has therefore been re-appraised see Appendix 1. The increased capacity would require a slightly greater density than previously envisaged in the SA, this would support making best use of land and therefore natural resources (objective 9); however, the effect compared to the previous scoring would be limited. Appropriate design sensitivity (as previously identified in CD3) in relation to the heritage assets near to the site |

| Mod No. | Policy/ Explanation/ Paragraph/ Annex | Summary of proposed Modification(s) | Screened in to SA? | Rationale/Explanation |
|--|---|---|--------------------|--|
| | | | | would be required to ensure that any adverse impact these assets would be mitigated. It is considered that this increased capacity could still be accommodated on land not at risk of flooding and therefore there is not change to scoring on objectives 11 and 12. The requirement for submission of a flood risk assessment is for consistency with the requirements of other thematic policies in the DMP on flood risk (CCF2). The site is still considered to give rise to positive impacts on housing delivery, health and wellbeing and economic objectives, and it is considered that negative effects can be addressed by appropriate policy mitigation. The revised appraisal for SSW9 in Appendix 1 also includes a number of factual corrections as identified in the Council's Post Hearing Actions Responses (RBBC-DMP-005). |
| Policy HOR1: High Street car park | | | | |
| MM38 | HOR1 Requirements: (132) | Additional requirement in relation to surface water management | No | This addition is for clarity and to reflect policy requirements elsewhere in the Plan (namely CCF2) which would apply to this site. The change is therefore for consistency and clarity and does not represent a change in policy approach. It does not therefore alter the conclusions of the SA nor give rise to significant sustainability effects. |
| Policy NWH1: Land at Meath Green Lane | | | | |
| MM39 | NWH1 Allocation: (p.139) and Requirements (p.139) | Amend site boundary to correct overlap with adjoining site. Additional requirement relating to need for a site specific flood risk assessment. Requirement for traveller provision included within allocation to ensure consistency with GTT1. | No | The modification to the site area reflects a reduction to correct an overlap with the adjoining housing site (NW Sector). This reduction does not affect the capacity or sustainability merits of the allocation. The addition to policy requirements reflects consistency with the requirements of other thematic policies in the DMP (CCF2 and GTT1). These change are therefore for consistency and clarity and does not represent a change in policy approach. Overall, the modifications do not therefore alter the conclusions of the SA nor give rise to significant sustainability effects. |
| MM40 | NWH2 Allocation (p.141) and Requirements (p.141) | Correction of site area. Addition of requirement to submit a flood risk assessment. | No | The revision to the site area is a factual correction. The addition to policy requirement for a FRA reflects consistency with the requirements of other thematic policies in the DMP (CCF2). Overall, the modifications do not therefore alter the conclusions of the SA nor give rise to significant sustainability effects. |

| Mod No. | Policy/ Explanation/ Paragraph/ Annex | Summary of proposed Modification(s) | Screened in to SA? | Rationale/Explanation |
|---|---|--|--------------------|--|
| Policy SEH4: Land off The Close and Harolsea Drive | | | | |
| MM41 | SEH4 Allocation: (p.143) | Amend site boundary to included increased land area. Amend allocation text to increase dwelling yield. Requirement for traveller provision included within allocation to ensure consistency with GTT1. | Yes | <p>The combined changes in the site area and capacity have potential to result in different sustainability performance compared to that previously considered through CD3. The previous site considered in CD3 included the adjoining haulage yard which is no longer incorporated in the allocation.</p> <p>Re-appraisal of the allocation concludes that the proposal would continue to score positively in a number of areas including providing sufficient housing (objective 1), travel (objective 4) and reducing greenhouse gas emissions (objective 8). As with CD3, potential negative impacts are identified in relation to air/noise pollution due to proximity to Gatwick, health and wellbeing and flood risk. However, possible mitigation is identified in respect of all of these, including appropriate noise attenuation, sustainable drainage systems and restricting development to land in FZ1 only, and providing public open space. The revised appraisal scoring matrix is included at Appendix 1.</p> |
| Policy HOR9: Horley Strategic Business Park | | | | |
| MM42 | Policy HOR9 Allocation (p.146), Requirements (p.146-147) and explanatory text (p.148) | Amend allocation to clarify overall policy intention in terms of mix of uses. Amend infrastructure requirements, including additional provisions in respect of strategic and local road networks, public transport improvements and walking/cycling. Inclusion of consideration of heritage assets in design requirements. Clarity as to possible mix of uses, to include B8 and airport related Sui Generis. Amendments to explanatory text to reflect the above. | No | <p>The modifications to the mix of uses are for internal consistency within the policy, the principal use remaining the same. The scope of secondary uses now proposed does not alter the overarching principle of an office led strategic employment site which was the basis for the original appraisal in CD3. Whilst the introduction of potential for limited B8 and airport-related Sui Generis uses on the site would represent a change in policy approach; the policy makes clear that they are intended to be "limited" in nature. The introduction of a limited proportion of wider uses would potentially provide flexibility to support the deliverability of the site and its potential to support achievement of the positive effects economic growth and provision of a wider range of employment opportunities (Objectives 6 and 7).</p> <p>The SA (Objective 14) already acknowledges the need for mitigation measures around noise, light and air pollution impacts on neighbouring residential properties and, subject to these, it is not</p> |

| Mod No. | Policy/ Explanation/ Paragraph/ Annex | Summary of proposed Modification(s) | Screened in to SA? | Rationale/Explanation |
|---|---------------------------------------|---|--------------------|--|
| | | | | <p>considered that the wider uses would give rise to greater negative impacts.</p> <p>The additional transport infrastructure requirements (including public transport, footpaths and limitations on the use of the strategic road network) represent a change in policy approach; however, they provide stronger steer towards non-car travel and thus would support the achievement of positive outcome against Objective 4 in relation to encouraging sustainable transport. The introduction of local Business Park traffic to Balcombe Road would increase vehicle use of that local road, but with a consequential decrease in traffic on the strategic road network. Subject to appropriate mitigation requirements in the policy, it is not considered that this would give rise to a significant alteration in the overall sustainability. The specific requirement for Air Quality modelling reflects mitigation which was previously identified in CD3 (Objective 14 – Air Quality).</p> <p>The modified requirements in respect of drainage reflect the provisions of other policies in the Plan (e.g. CCF2) and are provided for clarity; they do not represent a change in policy approach.</p> <p>The modifications to the explanatory text are necessary for consistency with the policy and are not considered to represent a change in policy approach nor alter the conclusions of the SA. Subject to the identified mitigation, the modifications do not therefore significantly alter the overall conclusions or scoring of the SA in relation to this policy, nor give rise to significant sustainability effects.</p> |
| Policy MLS1 Managing land supply | | | | |
| MM43 | Policy MLS1 (p.156-158) | Amend Policy MLS1 to remove specific ordering/phasing of sites. Consequential changes to supporting explanatory text. | Yes | <p>This change represents a shift in policy approach by removing a specific ordering in the release of sites.</p> <p>Re-appraisal concludes that the modified policy approach would have the potential to deliver a more positive effect in terms of the delivery of housing since it would potentially promote more rapid delivery of the allocated sites to meet housing needs, albeit it would not increase the overall number of units delivered. Appropriate mitigation can be put in place through individual site allocations to manage any site-specific impacts (e.g. landscape/biodiversity) or cumulative effects (e.g. transport infrastructure) such that release of the sites in tandem</p> |

| Mod No. | Policy/ Explanation/ Paragraph/ Annex | Summary of proposed Modification(s) | Screened in to SA? | Rationale/Explanation |
|---|---|---|--------------------|---|
| | | | | <p>should not give rise to any greater impacts. The policy would continue to promote use of previously developed land as it preserves the five year supply trigger.</p> <p>In terms of individual site allocations, each has been re-appraised based on the revised capacities and these are not considered to have significant environmental effects subject to inclusion of the mitigation measures specified within the policy requirements. On this basis, it is concluded that the proposal would still have a net positive environmental effect. The revised appraisal scoring is included at Appendix 1.</p> |
| Policy MLS2: Safeguarded land for development beyond the plan period | | | | |
| MM44 | Policy MLS2 (p.158-159) | Delete Policy MLS2 (and its Explanation text) in its entirety – remove safeguarded land on Rehdill Aerodrome. | Yes | The deletion of MLS2 and the removal of the proposal to safeguard land through the DMP represents a change in policy approach. However, the Inspector's Post Hearing Advice Note (ID/6) makes clear that there is insufficient evidence to demonstrate exceptional circumstances to safeguard land for future development at this time. On this basis, the safeguarding is no longer considered to be a reasonable option. |
| Annex 3: Marketing Requirements | | | | |
| MM45 | Annexe 3: Marketing requirements (p.173-174) | Amended wording to provide clarity of approach to length of marketing | No | These changes clarify the length of marketing required. The overall requirement to provide marketing evidence to justify loss of employment space is preserved. The modification does not constitute a change in policy approach. It does not therefore alter the conclusions of the SA nor give rise to significant sustainability effects. |
| Annex 6: Infrastructure Schedule | | | | |
| MM46 | Annex 6: Infrastructure Delivery Schedule Entry PE3 (p.216) | Amend infrastructure project PE3 in relation to cost and mechanism for delivery of school site | No | These changes are for consistency with the main policy ERM2/3 and provide clarity of intended mechanism for delivery of infrastructure. The modification does not constitute a change in policy approach which still requires provision of school site unless clearly justified as not needed. It does not therefore alter the conclusions of the SA nor give rise to significant sustainability effects. |
| Annex: 7: Housing Trajectory | | | | |
| MM47 | Annex 7 : Housing | Replace existing table in Annex 7. Factual corrections to reflect revised site | No | This modification relates to housing trajectory is for consistency and does not represent a change in policy approach. It does not therefore |

| Mod No. | Policy/ Explanation/ Paragraph/ Annex | Summary of proposed Modification(s) | Screened in to SA? | Rationale/Explanation |
|---------|---------------------------------------|-------------------------------------|--------------------|--|
| | Trajectory | capacities elsewhere in the DMP. | | alter the conclusions of the SA nor give rise to significant sustainability effects. |

Conclusions

15. Overall, the assessment of the impact of the proposed Main Modifications found that there would be no significant negative effects against the sustainability objectives in the SA.
16. The SA screened the proposed Modifications for their significance and identified that, in the vast majority of cases, the proposed modifications will have no effect on the overall sustainability effects of those policies and the plan as a whole. In a small number of cases, the proposed modifications may have different outcomes compared to those identified through CD3; however, in each case the effect was either positive or neutral subject to mitigation. None of the changes are considered to give rise to a greater negative effect against any objective compared to the scoring given in CD3.
17. In terms of cumulative or synergistic effects, the only potential difference identified arises from the modification to MLS1, specifically the removal of the ordering of release of urban extension sites. However, subject to appropriate mitigation in the individual allocations for these sites, particularly in respect of Transport Assessments on large sites (which inherently require cumulative considerations) and landscape/visual impact, the simultaneously release of these sites is not considered to give rise to negative synergistic effects on sustainability.
18. Taken as a whole, the modifications therefore do not significantly alter the overall findings of the Submission SA (CD3) in terms of delivering positive sustainability outcomes.

Appendix 1 – Revised Assessment Matrices

- NHE3 - Protecting Trees, Woodland Areas and Natural Habitats
- GTT1 - Gypsy, Traveller and Travelling Showperson Accommodation
 - a. G3 Woodlea Stables, Peeks Brook Lane, Horley
 - b. G4 Treetops/Trentham, Peeks Brook Lane, Horley
 - c. G12 Land at Kents Field, Rectory Lane, Chipstead
- SSW9 - Land at Dovers Farm
- SEH4 - Land off The Close and Harolsea Drive
- MLS1 - Managing land supply

Policy: NHE3 - Protecting Trees, Woodland Areas and Natural Habitats

Reappraisal Conclusions: Minor alteration to scoring

The proposed policy modification reflects an even more positive and proactive approach to biodiversity and enhancement. The policy change therefore has the potential to effect the scoring of Objective 16. However in the submission SA Objective 16 scored positive (+) this is to be amended to very positive (++) to reflect the additional development requirements within ,therefore it is seen unjustified to make alterations to the scoring.

All the other SA Objectives are considered to be unaffected by the modification.

The re-appraisal concludes that the modification does necessitate minor alterations to the SA but does not alter its overall conclusions.

| Appraisal Document | Sustainability Objective | | | | | | | | | | | | | | | | Proposal/Comments |
|--------------------|--------------------------|---|---|---|---|---|---|---|---|----|----|----|----|----|----|----|--|
| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | |
| Submission | 0 | + | 0 | 0 | 0 | 0 | 0 | + | + | 0 | + | 0 | 0 | + | + | + | This policy requires the protection of trees across the borough, which has positive impacts on health and wellbeing, flood risk reduction, air quality, landscape character, and biodiversity. |
| Post-Hearing | 0 | + | 0 | 0 | 0 | 0 | 0 | + | + | 0 | + | 0 | 0 | + | + | ++ | This policy requires the protection of trees across the borough, which has positive impacts on health and wellbeing, flood risk reduction, air quality, landscape character, and biodiversity. The inclusion of specific widened protections for Bechstein's Bat commuting and foraging habitat (including mature vegetative linear features such as woodlands, hedgerows) within 3.5km of the SAC will further promote biodiversity protection. |

Policy GTT1 - Gypsy, Traveller and Travelling Showperson Accommodation

Reappraisal Conclusions: Minor alteration to scoring

The proposed policy modification reflects an even more positive and proactive approach to providing Gypsy, Traveller and Travelling showperson accommodation. This includes more positive approach to the intensification of existing allocated sites and explicit safeguarding of existing traveller sites to meet traveller needs only.

The submission SA Objective 1 scored positive (+); the change in policy increases the capacity and range of potential traveller sites and provides protection for existing accommodation and is considered to have a greater positive effect, justifying a change to significant positive (++). In the submission SA Objective 5 scored negatively (-), whilst the policy would support intensification of existing sites and therefore assist in using previously developed land, overall, given the other greenfield allocations, the modification is not significant enough to justify any alterations or give rise to a more positive effect.

The re-appraisal concludes that the modification does necessitate minor alterations to the SA but does not alter its overall conclusions.

| Appraisal Document | Sustainability Objective | | | | | | | | | | | | | | | | Comments |
|--------------------|--------------------------|---|---|---|---|---|---|---|---|----|----|----|----|----|----|----|--|
| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | |
| Submission | + | 0 | 0 | 0 | - | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | This policy provides allocations for housing for gypsy, traveller, and travelling showpeople communities, although this land is not previously developed. |
| Post-Hearing | ++ | 0 | 0 | 0 | - | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | The revised policy approach would fully meet the needs of gypsies and travellers, both in terms of quantity of pitches but also a selection of sizes ranging from new larger sites for extended families, extensions and small single family pitches. The specific protection of existing traveller sites will support provision in the long-term, avoiding unjustified losses of traveller pitches to potentially more valuable uses. |

G3 - Woodlea Stables, Peeks Brook Lane, Horley

Reappraisal Conclusions: No alteration to scoring

The policy modification to increase the site capacity is within the policy approach of GTT1. The policy modification has also strengthened the requirement to fully address flood and noise risk at the application stage.

The policy change has the potential to effect the scoring of Objectives 1, 11 and 14. The submission SA Objective 1 scored positive (+), whilst the change in policy increases the capacity, individually this increase is very modest (1 pitch); thus this is not considered to change the scoring but reinforces the previously judge positive. In the submission SA (CD3) Objective 11 scored neutral (0), the policy change strengthens the flood mitigation requirements to ensure that development would continue to have a neutral effect on flooding, even at the increased capacity. In the submission SA Objective 14 scored negative (-) whilst the policy increases the potential number of occupants at risk from noise, proposed mitigation could help to alleviate this, although is unlikely to neutralise it particularly in outside areas. Thus a negative score is still considered justified.

All the other SA Objectives remain unchanged. The re-appraisal concludes that the modification does not necessitate alterations to the SA or its conclusions.

| Appraisal Document | Sustainability Objective | | | | | | | | | | | | | | | | Proposal/Comments |
|--------------------|--------------------------|---|---|----|---|---|---|----|---|----|----|----|----|----|----|----|--|
| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | |
| Submission | + | - | 0 | -- | + | 0 | 0 | -- | 0 | 0 | 0 | 0 | + | - | 0 | 0 | This site would provide up to 4 pitches, would re-use some previously developed land, and would require contamination to be cleaned up before the site could be inhabited. However, the site is a very long distance from the nearest services and facilities, and would likely increase the need to travel by car significantly. The site is also very close to a motorway, and the air and noise pollution from this road is likely to have a negative health impact on residents. |
| Post-Hearing | + | - | 0 | -- | + | 0 | 0 | -- | 0 | 0 | 0 | 0 | + | - | 0 | 0 | This site would provide approximately 5 pitches. This would re-use some previously developed land, and would require contamination to be cleaned up before the site could be inhabited. However, the site is a very long distance from the nearest services and facilities, and would likely increase the need to travel by car significantly. The site is also very close to a motorway, and the air and noise pollution from this road is likely to have a negative health impact on residents. However the policy provides requirement for full assessment mitigation for noise and flood risk. |

Policy G4 - Treetops/Trentham, Peeks Brook Lane, Horley

Reappraisal Conclusions: No alteration to scoring

The policy modification to increase the site capacity is within the policy approach of GTT1. The policy modification has also strengthened the requirement to fully address flood and noise risk at the application stage.

The policy change has the potential to effect the scoring of Objectives 1, 11 and 14. The submission SA Objective 1 scored positive (+), whilst the change in policy increases the capacity, individually this increase is very modest (1 pitch); thus this is not considered to change the scoring but reinforces the previously judge positive. In the submission SA Objective 11 scored negative (-); whilst the policy change strengthens the flood mitigation requirements associated with any application, the increased capacity is likely to increase pressure on the need to site caravans or ancillary buildings on land at risk of flooding. Thus, the overall scoring is considered to remain negative. In the submission SA Objective 14 scored negative (-) whilst the policy increases the potential number of occupants at risk from noise, proposed mitigation could help to alleviate this, although is unlikely to neutralise it particularly in outside areas. Thus a negative score is still considered justified.

All the other SA Objectives remain unchanged. The re-appraisal concludes that the modification does not necessitate alterations to the SA.

| Appraisal Document | Sustainability Objective | | | | | | | | | | | | | | | | Proposal/Comments |
|--------------------|--------------------------|---|---|----|---|---|---|----|---|----|----|----|----|----|----|----|---|
| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | |
| Submission | + | - | 0 | -- | + | 0 | 0 | -- | 0 | - | - | 0 | + | - | 0 | 0 | This site would provide up to 2 pitches, would re-use some previously developed land, and would require contamination to be cleaned up before the site could be inhabited. However, the site is a very long distance from the nearest services and facilities, and would likely increase the need to travel by car significantly. The site is at risk of flooding. The site is also very close to a motorway, and the air and noise pollution from this road is likely to have a negative health impact on residents. |
| Post-Hearing | + | - | 0 | -- | + | 0 | 0 | -- | 0 | - | - | 0 | + | - | 0 | 0 | |

Policy G12 - Land at Kents Field, Rectory Lane, Chipstead

Reappraisal Conclusions: No alteration to scoring

The policy modification to increase the extent of the site to incorporate the existing traveller site and to increase the overall capacity to 4 additional pitches, rather than the 2 originally appraised through CD3.

The policy change has the potential to effect the scoring of Objectives 1, 5 and 11. The submission SA Objective 1 scored positive (+), whilst the change in policy increases the capacity, individually this increase is modest (2 pitch); thus this is not considered to change the scoring but reinforces the previously judge positive. Cumulatively with other changes to GTT1 and its allocations, there is a greater positive effect on housing as identified in the assessment for GTT1 above. The larger site area would encompass an area of previously developed land in the form of the existing traveller site; however, the overall extent is not considered to be so significant as to warrant a more positive score against Objective 5 (0).

All the other SA Objectives remain unchanged. The re-appraisal concludes that the modification does not necessitate alterations to the SA.

| Appraisal Document | Sustainability Objective | | | | | | | | | | | | | | | | Proposal/Comments |
|---------------------|--------------------------|---|---|---|---|---|---|---|---|----|----|----|----|----|----|----|--|
| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | |
| Submission | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | ++ | ++ | - | 0 | 0 | 0 | 0 | This site would provide up to 2 pitches, and is preferable in terms of flood risk. However, the site is located in an area at high risk of groundwater contamination, which may be a concern. |
| Post-Hearing | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | ++ | ++ | - | 0 | 0 | 0 | 0 | This site could provide approximately 4 additional pitches, the site is also larger than previously proposed, and is preferable in terms of flood risk. The increased site area takes in previously developed land and thus does not have any negative impacts in terms of use of greenfield land resources. However, the site is located in an area at high risk of groundwater contamination, which may be a concern, for example, if extensive new hardstandings are proposed. This would however apply more to the greenfield parts of the site. |

SSW9 – Land at Dovers Farm, Reigate

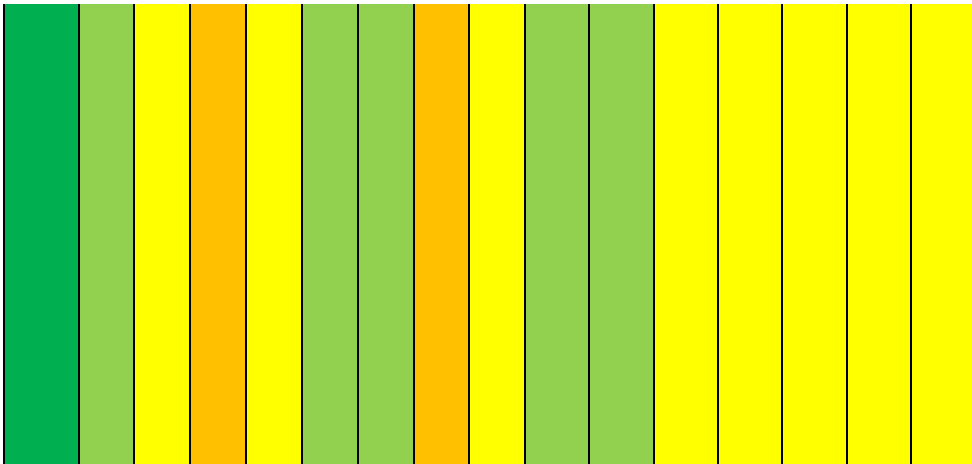
Reappraisal Conclusions: Minor alteration to scoring

The proposed policy modification reflects an increase in the dwelling capacity of the site to 120 units which exceeds the range which was appraised in the Submission SA (108 units). A modest increase in the density assumed through CD3 would be required to achieve this increase capacity (from 33 to 37dph).

In the Submission SA, the policy scored positive (++) for housing delivery. The modification will moderately increase the potential of the site to support housing delivery, reinforcing the significant positive in respect of housing delivery. The increased density would enable more effective use of a scarce land resource. The site scored negatively (-) in relation to heritage assets in the Submission SA; however, there were factual inaccuracies in the assessment (as set out in the Council’s Post Hearing Responses RBBC-DMP-005) which influenced this outcome. Given the size of the site and location of the listed buildings, the increased capacity and density is considered to be achievable without undue impact on heritage assets; however, the greater capacity reinforces the need for sensitive layout and design to mitigate any impacts. Subject to this mitigation, the proposal would have a neutral impact and the scoring is therefore revised to (0). Subsequent landscape and visual appraisal of the site has confirmed that, subject to retention and strengthening of tree belts, the site would have limited effects on the wider landscape; consequently, the negative scoring (-) identified in CD3 is adjusted to neutral (0) even with the increased capacity. Whilst the site is partially within a flood zone, as above, the increased capacity is considered achievable without needing to take in more land and thus there is no change to potential impacts on flooding; drainage measures would be required in mitigation.

The re-appraisal concludes that the modifications and factual corrections do necessitate minor alterations to the SA but does not alter its overall conclusions, which would remain overall positive in relation to this policy subject to appropriate mitigation.

| Appraisal Document | Sustainability Objective | | | | | | | | | | | | | | | | Proposal/Comments |
|--------------------|--------------------------|---|---|---|---|---|---|---|---|----|----|----|----|----|----|----|--|
| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | |
| Submission | ++ | + | - | - | 0 | + | + | - | 0 | + | + | 0 | 0 | 0 | - | 0 | The site is estimated to have a capacity of 108 dwellings. Only a small part of the site is located within a flood zone. The site is near a local centre but is some distance from the nearest town centre, although it is closer to a sports centre, which may contribute to increasing activity among residents. The site contains or is adjacent to a number of Grade II listed buildings which may be impacted by development. The site is located in a part of the green belt which was rated as high priority, leading to a potentially significant impact on landscape character. |
| Post-Hearing | ++ | + | 0 | - | 0 | + | + | - | 0 | + | + | 0 | 0 | 0 | 0 | 0 | The site is estimated to have a capacity of 120 dwellings. Only a small part of the site is located within a flood zone. The site is near a local centre, although it is closer to a sports centre, which may contribute increasing activity among residents. The site is adjacent to a number of Grade II listed buildings, however, given the |



scale of development proposed it is considered that their setting could be preserved with appropriately sensitive layout and design, even at the increased capacity now considered through the MM. The site is located in a part of the green belt that was rated as a moderate priority; The site is contiguous with the existing residential development to both the north and west. The parcel is not considered to be previously developed; however, in the south of the site there is a residential unit and industrial unit (B1/B8). Development would have a limited impact on landscape character, as confirmed through landscape and visual appraisal subject to appropriate mitigation in the form of retention/enhancement of tree belts and appropriate layout.

SEH4 - Land off The Close and Harolsea Drive

Reappraisal Conclusions: Minor alteration to scoring

The proposed policy modification reflects a revised site areas compared to that previously considered through the submission SA, with some of the previously included employment areas and land to the south not forming part of the allocated site. The capacity, at 75 dwellings, is below the range previously identified in CD3, reflecting the reduced site extent. A modest increase in the density assumed through CD3 would be required to achieve this increase capacity (from 33 to 37dph).

In the Submission SA, the policy scored positive (++) for housing delivery. The now proposed site, given its smaller area, has less housing potential (75 dwellings compared to the 101-151 previously assumed through CD3) but would nonetheless make a valuable contribution to support housing delivery, including affordable homes. The significant positive score is therefore still considered appropriate. The site area now being considered no longer includes land within the 57dB noise contour for Gatwick, and is further from the extent of the AQMA. Whilst mitigation should still be considered to ensure no adverse noise impacts from the airport, this is likely to be achievable and thus a revised scoring from negative (-) to neutral (0) is justified in respect of Objectives 2 and 14. The increased density would enable more effective use of a scarce land resource. The allocated site area does not include land within the Gatwick Open Setting (unlike the site extent appraised in CD3) and subsequent landscape and visual appraisal of the site has confirmed that, subject to retention and strengthening of tree belts, the site would have negligible effects on the wider landscape; consequently, the negative scoring (-) identified in CD3 is adjusted to neutral (0). The land proposed to be allocated is wholly in Flood Zone 1, sustainable drainage measures would be required as mitigation to prevent additional run-off; as such, an adjustment to the scoring on Objective 11 (from negative to neutral) is considered justified.

The re-appraisal concludes that the modifications do necessitate minor alterations to the SA; however, the overall outcome is considered more positive in sustainability terms than CD3 with less negative potential outcomes subject to mitigation.

| Appraisal Document | Sustainability Objective | | | | | | | | | | | | | | | | Proposal/Comments |
|--------------------|--------------------------|---|---|----|---|---|---|---|---|----|----|----|----|----|----|----|--|
| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | |
| Submission | ++ | - | 0 | ++ | + | + | 0 | + | 0 | - | - | 0 | + | - | - | 0 | The site is estimated to have a capacity of 101-151 dwellings. The site is close to the town centre and employment area, with access to public transport. The site would represent a good use of previously developed land, as it would densify an existing residential area (although would also lead to some potential loss of employment uses). However, part of the site falls within the Gatwick Open Setting which aims to maintain separation between Gatwick and Horley. The site is close to Gatwick Airport and part of the site is within the 57dB noise contour of Gatwick and close to an AQMA, suggesting problems with noise and air pollution that may affect residents' health. The western half of the site is also within a flood zone. |

Post-
Hearing

| | | | | | | | | | | | | | | | |
|----|---|---|----|---|---|---|---|---|---|---|---|---|---|---|---|
| ++ | 0 | 0 | ++ | + | + | 0 | + | 0 | - | 0 | 0 | + | 0 | 0 | 0 |
|----|---|---|----|---|---|---|---|---|---|---|---|---|---|---|---|

The site is estimated to have a capacity of 75 dwellings. The site is close to the town centre and employment area, with access to public transport. The site would represent use of some previously developed land, and would densify an existing residential area. Some potential loss of land for current employment uses (part of the haulage yard) would potentially occur. The site is close to Gatwick Airport; whilst it does not fall within the 57dB noise contour, consideration should be given to measures to minimise noise ingress into properties to ensure no adverse health and wellbeing effects. The site is wholly in Flood Zone 1; given the size of the site, SuDS measures should be incorporated to mitigate against additional run off. The site has been subject to landscape appraisal which confirms likely negligible effects subject to retaining existing strong tree belts.

MLS1 - Phasing of Urban Extension Sites

Reappraisal Conclusions: Minor alteration to scoring

The proposed policy modification reflects a less prescriptive approach to the release of urban extension sites, removing the previously proposed ordering/phasing which would have been appraised in the previous SA (CD3).

In the Submission SA, the policy scored positive (+) for housing delivery. The modification will reduce undue restrictions on the timing of release of urban extensions sites and thus has the potential to support more timely delivery of new homes to meet identified needs. Overall, the modified policy approach is considered to have a greater positive effect as a result and the scoring is revised to (++). The effect on objective 5 (previously developed land) will remain the same as the modification still retains the five year supply trigger, ensuring that greenfield sites will only be released when it is clear that brownfield sites are failing to delivery necessary housing. Thus, there will be no undue competition.

The Submission SA identified a positive effect arising from the ordered release in relation to landscape, as slower release would enable management of landscape impacts. Whilst the phased release is no longer proposed, subsequent landscape and visual impact analysis of the SUE sites has shown that in each case, site specific landscape impacts can be mitigated. Subject to appropriate mitigation in the site allocation policies for each, the removal of the ordered phasing is not therefore considered to result in any change to scoring. The re-appraisal concludes that the modification does necessitate minor alterations to the SA but does not alter its overall conclusions, which would remain overall positive in relation to this policy.

| Appraisal Document | Sustainability Objective | | | | | | | | | | | | | | | | Proposal/Comments |
|--------------------|--------------------------|---|---|---|---|---|---|---|---|----|----|----|----|----|----|----|---|
| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | |
| Submission | + | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | This policy sets out the phasing process for the sustainable urban extensions sites, explaining under what circumstances they will be released for development. The gradual release of these sites provides benefits for landscape impact, and ensures that previously developed land is the first focus of development. |
| Post-Hearing | ++ | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | This policy sets out the phasing process for the sustainable urban extensions sites, explaining under what circumstances they will be released for development. The modification to remove the specific ordering has the potential to support more timely delivery of these sites to ensure housing needs are met. Landscape impacts can be effectively managed on a site by site basis through policy mitigation which would avoid cumulative effects. |