

Reigate & Banstead Core Strategy

Sustainability Appraisal Adoption Statement

July 2014

Reigate & Banstead BOROUGH COUNCIL Banstead | Horley | Redhill | Reigate

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1. Introduction

- 1.1 In January 2014 the Reigate and Banstead Borough Council Core Strategy was found legally compliant and sound (subject to modifications) by the Planning Inspector appointed to examine it.
- 1.2 This report explains the Sustainability Appraisal (SA) process influenced the development of the Core Strategy.

Sustainability Appraisal and Strategic Environmental Assessment

1.3 SA identifies the social, environmental and economic impacts of a strategy and suggests ways to avoid or minimise negative impacts and maximise positive impacts. The Planning and Compulsory Purchase Act 2004 requires that SA is undertaken during the preparation of local plan documents, and that an SA Report is published. The Reigate and Banstead Core Strategy SA also incorporates Strategic Environmental Assessment (SEA), as required by the European Directive on Environmental Assessment of Plans and Programmes 2001/42/EC (transposed into UK legislation through the Environmental Assessment of Plans and Programmes Regulations 2004). This is consistent with advice in the National Planning Policy Framework (2012), which states:

"A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors."

- 1.4 The main focus of this report is on how the SA and SEA have informed the final Core Strategy. Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004 requires that, as soon as reasonably vpracticable after the adoption of a plan for which SEA has been carried out, the planning authority must publish a statement, which explains:
 - a. how environmental considerations have been integrated into the plan;
 - b. how the environmental report has been taken into account;
 - c. how consultation opinions on the environmental report have been taken into account;
 - d. the reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with; and
 - e. the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.
- 1.5 As the SA and SEA process have been integrated throughout the plan preparation process, this statement addresses not only environmental aspects but also the wider sustainability (social and economic) aspects.

Habitats Regulations Assessment

1.6 HRA – assessment of the impacts of plans and projects on the Natura 2000 network of internationally important nature conservation sites – is also required as part of the plan preparation process, by the European 'Habitats Directive' (transposed into UK legislation through the Conservation of Habitats and Species Regulations 2010). The Habitats Directive applies the precautionary principle to designated sites: plans can only be permitted if it

has been shown that they will not adversely affect the designated sites, or else can go ahead only under limited and stringent requirements regarding findings of no alternatives, imperative reasons of overriding public interest and provision of compensatory measures.

2. How environmental and wider sustainability considerations have been integrated into the Core Strategy

Whether SEA/SA is required

2.1 The formal preparation of the Core Strategy began after 20 July 2004, so under the EU Directive this plan falls within the timescale of those requiring an SEA. National legislation also requires that sustainability appraisal should be an integral part of the plan preparation process.

<u>Methodology</u>

- 2.2 A framework for the SA process was established through joint working with other East Surrey authorities and statutory agencies. This guided the SA process throughout the development of the Core Strategy, and involved the development of shared SA objectives, a peer review process and verification by an independent consultant.
- 2.3 The SA process has incorporated the requirements of SEA.

The process of SA/SEA

- 2.4 The various stages of SA/SEA that have been undertaken throughout the development of the Core Strategy are summarised in Table 1.
- 2.5 <u>The scoping stage:</u> The first Scoping Report was produced in 2005. It included baseline data about environmental, economic and social characteristics of the areas likely to be affected by the Core Strategy, identified other plans, programmes and policies and their objectives, and identified issues and opportunities associated with each sustainability objective. Baseline information included in the Scoping Report was updated in June 2009. More recently, the Scoping Report was fully reviewed in 2013. At this stage, the slightly revised sustainability objectives (see below) were reflected and baseline data and the review of plans, programmes and policies was updated.
- 2.6 At each stage in the scoping process, statutory agencies and other key bodies were consulted on draft documents and comments received were taken into account in the final published document.

Date	Plan Making Stage	SA/SEA Stage
Oct 2005	-	Scoping Report
Nov 2005	Issues and Options	Issues and Options Appraisal
May 2006	Preferred Options (1)	Preferred Options SA Report
July 2008	Revised Preferred Options	Revised Preferred Options SA Report
Jan 2009	Submission Document	Submission SA Report
June 2009	-	Updated baseline data report
July 2009	Suggested Amendments	Revised SA Report
July 2010	Proposed Changes	Proposed Changes SA Report
Sept 2011	Core Strategy Outstanding Issues	Outstanding Issues Interim SA Report
Mar 2012	Proposed Submission Document	Submission SA Report
July 2012	-	Updated Scoping Report
Nov 2012	Further Amendments	Further Amendments SA Report Addendum
1100 2012		Sustainable Urban Extensions SA Report
June 2013	Post Hearing Amendments	Post Hearing Amendments SA Report Addendum

- 2.7 <u>Sustainability objectives</u>: Sustainability objectives to guide the appraisal process were agreed across a grouping of East Surrey authorities and with the relevant statutory bodies. These objectives cover a range of social, environmental and economic impacts, for example: to reduce poverty and social exclusion, to ensure air quality continues to improve, provide employment opportunities and to increase the production and use of renewable energy (see Annex 1). A number of small changes were made to the objectives over the course of the Core Strategy development process, in agreement with other East Surrey authorities and statutory agencies; however the core principles remain unchanged.
- 2.8 <u>The appraisal stages</u>: At each stage of Core Strategy preparation, proposals were assessed (in the light of baseline scoping information) against a series of sustainability objectives (see above). The findings of the appraisal process were taken into account as the Core Strategy evolved, and at each stage of the process a Sustainability Appraisal Report was produced, and consulted on alongside the relevant Core Strategy document. Further information about the appraisal stages is provided in subsequent sections of this statement.
- 2.9 The SA has contributed to plan development by providing an independent assessment of the sustainability of the Council's proposed options and policies as they were developed. Use of the peer review and independent verification process enabled objectivity and transparency in the appraisal process. However, by integrating the SA as part of the wider and ongoing Core Strategy development (as demonstrated in Table 1), the recommendations from the appraisal process were able to feed into and inform the Core Strategy from the initial to final stages of its production. The various SA Reports provide an audit trail of the appraisal process.

3. How the Sustainability Report (including Environmental Report) has been taken into account

3.1 As outlined above, the Reigate and Banstead Core Strategy has gone through a series of stages of preparation. The full suite of SA Reports can be

accessed via the Reigate and Banstead Borough Council website at <u>http://www.reigate-</u> <u>banstead.gov.uk/planning/planning_policies/local_development_framework/su</u> stainability_appraisal/index.asp

- 3.2 At each stage the SA report contained a non-technical summary and the likely significant effects of the CS were identified, described and evaluated. Possible mitigation measures to minimise negative impacts and opportunities to maximise beneficial impacts were identified, reasonable alternative options were considered (and, further into the process, the reasons for selecting/rejecting alternatives) and possible areas for further monitoring were identified. At each stage the assessment and report produced was reflective of the level of detail in the plan, its stage in the plan-making process and the extent to which certain matters would be more appropriately assessed at different levels, such as in the Development Management Policies document appraisal, in order to avoid duplication of the assessment.
- 3.3 A summary of how the recommendations coming out of different stages of sustainability appraisal have been addressed is included at Annex 2.

<u>Scoping</u>

3.4 The scoping stage of the SA process helped to guide the generation of themes for the first draft of the Core Strategy (the Issues and Options stage). The scoping process highlighted the sustainability issues affecting the Borough and ensured that the sustainability objectives were in the minds of the plan-makers when drafting the policy options. The scoping stage of the SA fed into the drafting of the Core Strategy at its most initial stages and influenced policy options such as 'improve provision for cyclists and pedestrians in the Borough' and 'continue to protect ecological, historical and aesthetically important areas, sites and structures'. It also provided the baseline information against which subsequent policy options were assessed.

Selecting and Refining Options

3.5 Appraisal was carried out on each of the policy options that were included in the Issues and Options Report. Options were scored as positively or negatively affecting the baseline data. The appraisal also drew on legal requirements and targets identified by the review of relevant plans, policies and programmes. The results of this appraisal advised the policy-makers which of the policy options were the most sustainable. It also identified mitigation measures that could further improve the sustainability of the Core Strategy policies. The SA report, along with direction received from consultation responses, government guidance and higher level policy all contributed to the selection and refinement of the preferred Core Strategy policy options.

Preferred Options

3.6 Once preferred policy approaches were selected, their likely significant effects were evaluated, and measures were suggested to mitigate against adverse effects and maximise beneficial effects to further improve the sustainability of each policy. Due to a changing evidence base and changes in legislation, the Core Strategy policies went through two stages of Preferred Options

consultation. The Preferred Options were reviewed against the sustainability objectives in both May 2006 and May 2008.

3.7 As the policy approaches were developing, each was appraised to evaluate any specific impacts. The identification of these impacts and proposals for improvement were then fed into the plan-making process. Issues that resulted in a negative score under one sustainability objective may have also been addressed by a different objective, so the objectives were also assessed against each other and recommendations were drawn out.

Proposed Submission Document

- 3.8 After extensive public consultation on the policy approaches, the submission policies were drawn up in January 2009. At this stage, suggestions proposing amendments to the policy wording were minimal, as a result of the recommendations and changes made during previous stages of appraisal. At this stage of the appraisal the Core Strategy was found to have 'sound sustainability credentials', however, there were recommendations made for future work.
- 3.9 As part of the examination process, consultation was undertaken on Suggested Amendments to the Core Strategy in July 2009. This included a Revised SA Report. The initial submission Core Strategy SA Report had provided an account of the likely significant issues relating to the proposed distribution of development during the plan period. Appraisal was initially based on the proposed South East Plan housing target of 9240 houses in the Borough during the period 2006 to 2026.
- 3.10 Whilst different levels of growth were considered as part of the early stages of sustainability appraisal (Issues and Options 2005), the specific level of growth allocated to the Borough in the now published South East Plan was not tested. The revised Sustainability Appraisal Report addressed this by including a commentary with respect to the higher figure of 10,000 houses and, in addition, a clearer account of the likely impacts of an even greater total housing provision of 12,500.

Revising the Core Strategy

- 3.11 Following the examination hearings sessions the original Core Strategy was withdrawn. The Council re-entered the 'Plan preparation-formulation stage' which included updating the evidence base, taking into account the latest national and regional policy positions. In preparing the revised Core Strategy for submission, two rounds of consultation were undertaken:
 - a. Consultation on Proposed Changes to the Core Strategy (July 2010), and the accompanying Sustainability Appraisal Report.
 - b. Consultation on Core Strategy Outstanding Issues (September 2011), including the Outstanding Issues Interim Sustainability Appraisal Report.
- 3.12 At these stages, amongst other things, the overall level of housing growth, and different sources of potential supply to deliver housing growth were appraised further. The outcomes of these appraisals, along with consultation responses and updated evidence, informed the proposed revised Submission document.

Proposed revised Submission Document

3.13 Following consideration of consultation responses and SA findings, a revised Core Strategy was prepared. This built on both the outcomes of the earlier examination process and the results of subsequent consultation. Sustainability appraisal was undertaken where policies had changed, and the SA Report also contained the results from all previous appraisals and a summary of alternatives and the reasons for selection/rejection. The SA Report summarised the sustainability implications of the plan. It identified that the Core Strategy has sound sustainability credentials but that there are some areas monitoring will be required to understand potential adverse impacts. It also identifies where further testing would be needed as more detailed development management policies documents and site allocations are developed and aspects.

Sustainability Appraisal during the Examination in Public

- 3.14 Sustainability Appraisal was also undertaken on changes proposed through the Examination process:
- 3.15 <u>Sustainable urban extension broad locations</u>: Following an exploratory meeting in August 2012, the Core Strategy examination was suspended for further work to be carried out, including to identify broad locations for sustainable urban extensions. A detailed sustainability appraisal of potential areas of search was undertaken to inform the selection of preferred broad locations.
- 3.16 <u>Further Amendments stage</u>: As a result of the examination suspension, a number of other changes were proposed to the Core Strategy. These were appraised in an Addendum SA Report to be read alongside the Revised Submission SA Report and subsequently consulted upon. Changes were screened against the SA Framework, and where appropriate, SA was carried out on policy revisions. The document also included a summary of alternatives and the reasons for selection/rejection.
- 3.17 The SA findings resulting from these revisions were made available to the Planning Inspector, the public and planning officers for review, so as to raise awareness of implications, and to ensure any significant effects arising from the policy revisions were flagged. The Sustainability Appraisal of the proposed changes found that the changes either had neutral or beneficial sustainability effects. None of the changes were considered to result in any additional potentially negative effects than those identified previously as part of the May 2012 SA Report.
- 3.18 <u>Proposed Amendments stage:</u> Throughout the course of hearing sessions in May 2013, a number of modifications were proposed to the Core Strategy. Prior to consulting on these, the modifications were appraised and a SA Addendum Report published alongside the consultation document for comments.
- 3.19 In the main, no additional sustainability implications (including cumulative) were identified, although it was noted (as previously) that the level of assessment could only be strategic at this stage and more detailed assessment would be needed through the DMP.

4. How opinions expressed through public consultation have been taken into account

4.1 As shown in Figure 1, during the preparation of the Core Strategy there have been a number of stages of public consultation relating to the SA, many of which have been linked to consultation on Core Strategy development stages.

Consultation on SA Scoping Report stages

- 4.2 In accordance with the SEA Regulations the relevant statutory bodies (Environment Agency, English Heritage and the Countryside Agency and English Nature (later Natural England)) were consulted, along with other key stakeholders on emerging scoping reports and baseline data documents prior to these being finalised. Comments received in relation to these documents were incorporated prior to the documents being finalised.
- 4.3 In addition, the Sustainability Objectives have been agreed across East Surrey Authorities and the relevant statutory bodies.

Consultation on SA Reports throughout development of the Core Strategy

- 4.4 Whenever RBBC undertook formal consultation on the Core Strategy, the relevant SA Report was published alongside it. Documents were made available to view / download on the Council's website, and were also available for inspection at the Council Help shops, and local libraries during normal opening hours. Letters of notification, inviting comments, were sent to relevant consultees as detailed in the Borough Council's Consultation Statement.
- 4.5 A separate Consultation Statement has been prepared detailing the various stages of consultation, the responses received and how these have been taken into account is available on the Council's website. Statements about consultation responses and how these have been addressed have been published and made available to inform decision makers throughout the plan preparation process. During the formal examination stages of the plan preparation, all comments were made available to the Planning Inspector and where appropriate discussed at Examination hearing sessions.
- 4.6 Throughout the preparation of the Core Strategy, comments received at the consultation stages generally related to the emerging Core Strategy document rather than specifically the SA, however in some instances the points being made were related. Where relevant these were reflected in subsequent appraisals.
- 4.7 At the 2012 Submission Stage, the Environment Agency, Natural England and English Heritage confirmed that they considered the plan to be legally compliant and raised no concerns in relation to the SA process.

5. The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with

5.1 The Reigate and Banstead Core Strategy was prepared in an iterative way, with the SA, other evidence and the results of public consultation informing plan production.

- 5.2 A wide range of alternative options have been considered as part of the Core Strategy development. Several strategic spatial growth scenarios were identified for the Borough. Similarly, a number of supporting policy options were subject to consideration by the Council and consideration was also given to selecting suitable strategic growth sites to satisfy the chosen spatial growth strategy. The SA commented on how sustainable each of these options would be along with any considerations that would need to be taken into account when implementing them.
- 5.3 Importantly, there were certain limitations on the range of possible alternatives considered for the Core Strategy. This is because the plan was required to comply with existing and emerging national planning policy and guidance. These requirements set the framework for the plan, ensuring that local development was considered in conjunction with wider national objectives. As such, any reasonable alternatives needed to have regard to higher level policy. The results of public consultation were also taken into account in selecting plan options, along with the views of the Planning Inspectors appointed to examine the Core Strategy in order to secure soundness.
- 5.4 Annex 3 summarises the alternatives that were considered at different stages of plan preparation for the policies in the final Core Strategy.

6. The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme

- 6.1 The Environmental Assessment of Plans and Programmes Regulations 2004 require that local authorities "monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action."
- 6.2 A Monitoring Framework has been developed in support of the Core Strategy which will help:
 - a. To provide baseline data for the next SA and to provide a picture of how the environment / sustainability criteria of the area are evolving;
 - b. To monitor the significant effects or uncertainties of the plan identified through the SA process; and
 - c. To ensure that action can be taken to reduce / offset the significant effects of the plan.
- 6.3 Where possible, in implementing the monitoring identified as part of the SA, use will be made of existing monitoring processes to avoid duplication of effort.
- 6.4 The monitoring measures proposed as part of the SA process relate to the significant adverse effects and uncertainties that have been predicted to result from policy option implementation. These include the uncertainties highlighted during the comparison of the Core Strategy policies against the SA sub-objectives and recommendations.
- 6.5 The table below sets out the indicators that are proposed to monitor the significant effects and uncertainties that have been predicted to arise on the

implementation of the Core Strategy and the relevant SA Objective. Indicators are drawn from the Scoping Report (2012) and the Core Strategy Monitoring Framework.

SA Objective Potential issue Monitoring Proposal			
	identified by the SA report	Performance indicator	Target
SA1 To provide sufficient housing to enable people to live	Delivery of affordable housing	Number of additional affordable homes delivered	At least 100 per annum
in a home suitable to their needs and which they can afford.		Tenure mix of affordable homes delivered	Affordable housing tenure mix to be in line with SHMA recommendations
		Percentage of schemes over 15 units providing at least 30% of affordable housing on site	100%
		Percentage of schemes of less than 15 units providing a financial contribution towards affordable housing in line with policy requirements	100%
	Cypey and travellar	Developments resulting in a net loss of affordable housing	None outside of regeneration areas
	Gypsy and traveller provision	5 year supply of sites Site allocations for additional	Maintain a five year supply Sufficient allocations in
	D · · · · ·	plots and pitches	the DMP to meet identified need
SA2 To facilitate the improved health and wellbeing of the whole population	Provision of sufficient urban open land	Quantum of UOL	No net loss once extent has been reviewed through DMP
SA3 To reduce poverty, crime and social exclusion.	Delivery of regeneration priorities	Progress of Horley sectors and sites within regeneration areas against anticipated timescales	All major schemes progressing in line with anticipated timescales contained in Corporate Plan and or/DMP.
		IMD scores for LSOAs within regeneration areas	Improvement
SA 6 To make the best use of previously developed	Development of previously developed land	Percentage of new residential dwellings built on previously developed land	At least 50%
land and existing buildings.		Percentage of additional nonresidential floorspace built on previously developed land	At least 90% across plan period
SA8 To ensure air quality continues to improve.	Air Quality Management Areas	Emissions recorded in AQMAs	No increase
SA12 To conserve and enhance biodiversity within the plan area.	Implementation of the SAC Mitigation Plan	Delivery of measures to mitigate and avoid pressure on the SAC	Provide a GI plan listing specific GI projects to be delivered in line with the timescales set out in the emerging GI action plan and/or

 Table 2: Monitoring issues identified by the SA

			dolivory portpore
		Major residential or commercial developments in proximity to the SAC	delivery partners No major commercial or residential schemes permitted within 800m of the SAC without Appropriate mitigation/avoidance measures in place.
	Provision of sufficient urban open land	See above	
SA13 To protect and enhance the natural, archaeological and	Protecting cultural and heritage interests	Planning permissions granted contrary to English Heritage advice	No permissions granted contrary to EH advice
historic environments and cultural assets		Loss of statutory and locally listed buildings	No loss of listed buildings
		Number of heritage assets on the 'at risk register'	Reduction in number of assets on the 'at risk register'
	Protecting the landscape	Number of permissions granted contrary to Natural England advice	No permissions granted contrary to NE advice
		Permissions for major development within and around the AONB	No applications granted for major development proposals within the AONB
SA14 To reduce the need to travel, encourage sustainable transport options and make the best use of	Improving provision for walking, cycling and public transport	Percentage of completed non-residential floorspace located within 15 minutes of a public transport stop or walking distance to a town centre	At least 80%
existing transport infrastructure		Percentage of completed residential dwellings located within 15 minutes of a public transport stop or walking distance to a town centre	At least 80%
		Percentage of major residential and commercial developments committing to a travel plan	100%
		Percentage of proposals for new homes and non- residential floorspace providing cycle parking spaces	100%
		Parking levels achieved on residential and non- residential developments and in the most sustainable locations	All developments to be in line with standards adopted within subsequent guidance
SA19 To increase energy efficiency and the production of energy from low	Meeting the appropriate level of Code for Sustainable Homes	Percentage of new homes meeting or exceeding Code for Sustainable Homes Level 4	100%
carbon technologies, renewable sources and decentralised generation systems	Meeting the appropriate level of BREEM	Percentage of non- residential developments achieving or exceeding BREEAM 'very good'	100%

Inc	creasing the	Development of	No target
ca	apacity of	decentralised networks and	
rei	newable energy	percentage of development	
		connected	

7. Conclusions

- 7.1 The Core Strategy sets out the long-term spatial vision, objectives and strategy for the Borough and provides a framework for delivering development for the period up to 2027. The Core Strategy has been subject to a Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) which has been on-going throughout the development of the Core Strategy. The SA has informed the Council of the economic, social and environmental effects of the emerging Core Strategy throughout its preparation.
- 7.2 In addition, HRA has been undertaken to assess the impacts of the Core Strategy on the Natura 2000 network of internationally important nature conservation sites.
- 7.3 The strategic nature of the Core Strategy policies has made more detailed assessments difficult, due to the size and location of site allocations being unknown at this stage. However the Core Strategy Policies provide a sustainable framework for these allocations and seek to minimise and/or mitigate any potential adverse effects through the use of criteria based policies. The policies therefore may be considered appropriate and proportionate for the strategic nature of the Core Strategy. Potential adverse effects associated with detailed development proposals will be considered in more detail as part of any additional work in future LDF documents.

Annex 1 – Sustainability Appraisal Objectives

1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.

2. To facilitate the improved health and wellbeing of the whole population

3. To reduce poverty and social exclusion

4. To minimise harm from flooding.

5. To improve accessibility to all services facilities, and natural greenspace.

6. To make the best use of previously developed land and existing buildings.

7. To reduce land contamination and safeguard soil quality and quantity

8. To ensure air quality continues to improve

9. T o reduce noise pollution.

10. To reduce light pollution

11. To improve the water quality of rivers and groundwater, and maintain an adequate supply of water.

12. To conserve and enhance biodiversity and networks of natural habitat.

13. To conserve and enhance landscape character and feature, the historic environment and cultural assets and their setting.

14. To reduce the need to travel, encourage sustainable transport options and make the best use of existing transport infrastructure.

15. To ensure that the District adapt to the impact of the changing climate.

16. Provide for employment opportunities to meet the needs of the local economy

17. Support economic growth which is inclusive, innovative and sustainable.

18. To achieve sustainable production and use of resources.

19. To increase energy efficiency and the production of energy from low carbon technologies, renewable sources and decentralised generation systems.

NB Over the course of the Core Strategy development the precise number and wording of objectives has evolved, however the fundamental sustainability principles addressed by the objectives has remained consistent.

Annex 2 Summary of how SA recommendations have been addressed

Stage	Issue	Recommendation	Where this was addressed	Policy Reference(s)
Issues and Options 2005	Housing location and density	Option A2 should be selected over other 2 alternatives as scored higher on a number of SA objectives. Option A2 could be enhanced by ensuring that development is allied to public transport provision and at a density sufficiently high (40+ dph) to create potential viability for combined heat and power. Additionally, mitigating measures should be employed to protect and enhance both the historic and natural environment within these urban areas	Option A2 was carried through to Preferred Options. Development hierarchy directs development in the first instance to urban areas and therefore areas served best by public transport. CS4 affords protection to historic and natural environment within the urban area. High density development scored negatively later on in the appraisal process as the impacts of high density development in the urban area became clear (through evidence on urban open space and latest climate change information)	Policy CS4 and CS6
	Affordable housing	Option B1a should be selected over other alternative as scored higher on a number of SA objectives.	Option B1a was carried through to Preferred Options	CS15
	Increase affordable housing threshold	Viability and longer-term supply could be affected as a result of the higher financial burden on specific sites. A continuation of the existing threshold means that the longer-term supply is at risk, as the number of these larger sites is finite.	Affordable housing threshold has been set at 15 dwellings or more for delivery, but less than 15 will still bring in a contribution towards affordable housing elsewhere in the borough.	CS15
	Affordable housing delivery	A policy that will deliver sufficient quantity of affordable housing	Policy CS15 sets the affordable housing requirements	CS15
	Landscape areas	Continue to protect ecological, historical and aesthetically important areas	Carried through to Preferred Options.	CS2
	Community facilities	The phrase "surplus to requirements" needs to be better understood relative to the wider sustainability.	CS12 resists the loss of community facilities unless it can be demonstrated that such a need no longer exists.	CS12
	Renewable energy	The wording of the option needs to be considered in the light of guidance in PPS22 which warns against an area-based policies governing renewable energy generation in favour of criteria based policies	Criteria based policies will be a design consideration and covered in the DMP.	DMP
Preferred Options 2006	Air quality	Further opportunities to reduce car-use in urban areas (e.g. appropriate car- reduced/car free	CS117 Travel options and Accessibility address reducing the need to travel and facilitating	CS17

		housing; car clubs) could be investigated as policy options.	sustainable transport choices.	
	Noise and light pollution	It is recommended that consideration be given to best practice relating to noise insulation and external lighting (as required to achieve EcoHomes maximum scores). The requirement to optimise lighting to enhance safety in public areas will need to be carefully designed.	CS10 (3) refers to designing for neighbourhoods which are safe and secure. CS10 (8) includes reference to noise and light pollution.	CS10 and DMP
	Water quality	There are no measures advocated to reduce the risk of pollution into the Borough's rivers/watercourses.	CS10 (8) Developments must be designed to minimise pollution and safeguard water quality.	CS10 and DMP
	Urban biodiversity	Alludes to the enhancement of the urban environment, this could benefit from the development of a proactive policy incorporating positive biodiversity measures into all new development.	CS2 commits to promote, enhance and manage a multi-functional green infrastructure network across the borough. CS2 aims to protect and enhance urban green space that contributes to the GI network. CS4 asks that development proposals will protect and enhance existing areas of biodiversity value. CS12 aims to secure GI in line with GI strategy to include provision of new open space.	CS2, CS4 and CS12
		Needs further policy development relating to criteria based policy for standalone renewable energy technology/CHP infrastructure	CS11 the council will encourage and promote the development of decentralised energy networks.	CS11 and DMP
		Local distinctiveness can be a significant barrier to the challenges of climate change in particular.	Local distinctiveness is covered by CS4. Policy CS11 ask for new development to be designed to meet CSH4 or higher, and BREEAM 'very good' (including extensions). CS10 asks that development should contribute to a reduction in carbon emissions.	CS4, CS10, CS11 and DMP
	Vitality / car use conflict	An unhealthy conflict exists between the wishes to increase the vitality and vibrancy of the town centre, and reduce the need to travel. Further information may be required relating to incentives/disincentives to achieve both objectives.	Redhill Town Centre was chosen as a centre for commercial development partly due to the excellent links in public transport. Transport work has been carried out through the Redhill AAP to improve the flow of traffic through and around the town through distribution of car parking that could contribute to better air quality.	DMP
Preferred Options 2008	Green infrastructure	Consideration should be given to the use of criteria in policy to ensure: quality of urban open	Green Infrastructure in CS2 and CS4. Resist loss of open spaces – CS12, and provision of	CS2, CS4, CS10, CS11,

	space/public realm/green infrastructure, provision of open space in accordance with Natural England's ANGST and to avoid increased recreational pressure on the Reigate to Mole Valley Escarpment SAC, use of green roofs, using landscaping/planting to address urban heat environment and for habitat provision, avoiding conflict between recreation and protection of the most sensitive areas.	new open space and improvements to existing open space through CS12. Protection of SAC through CS2 and mitigation put forward in HRA, Green roofs alluded to in CS10 point 9 (design reflecting need to adapt to impacts of climate change) more detail in DMP, also design for urban heat environment (CS10 point 9), conflicts between recreational use and sensitive areas should be addressed through GI strategy, the protection afforded by CS1 of sensitive areas, HRA and protection of open space (CS12).	CS12 and DMP
Housing and infrastructure	Consideration should be given to the use of criteria in policy to ensure: delivery of affordable housing, infrastructure matches development in the long term, environmental benefits are maximised through the provisions of the Code for Sustainable Homes, links with design guidance general and site specific design guidance, setting appropriate tariff levels that achieve the aim without adversely affecting viability, noise and light nuisance is limited. The policy wording could emphasise how the infrastructure provided could be more in line with 'sustainable living' and give a greater indication of how adaptation to climate change could be incorporated.	Affordable housing policy CS15, Infrastructure/ contributions - policy CS13. CSH required in CS11. CS10 refers to minimising noise and light pollution. Adaptation to climate change is addressed through policy CS10. Detail will be addressed in DMP.	CS10, CS11, CS12 and CS15
Energy	Consideration should be given to the use of criteria in policy to ensure: the need for design advice to support and encourage the development of renewable energy infrastructure, particularly with landscape and heritage designations, taking the opportunities offered by mixed use for renewable energy and CHP, energy efficiency improvements based on the application of BREEAM and CSH and CHP	More detailed design advice will be in the DMP and design and parking SPD; BREEAM, CSH and CHP in CS11.	CS11 and DMP
Flooding	Consideration should be given to the use of criteria in policy to ensure: flood risk is addressed in Redhill and Horley, wider use of SuDS.	Flood risk is addressed through CS10 point 10; it will also be addressed further in more site specific detail in the DMP. RAAP includes more detail on flooding in Redhill and builds on SFRA	CS10 and DMP

			for Redhill.	
	Economy	Consideration should be given to the use of criteria in policy to ensure: the Employment Land Review informs the quantity and location of employment land, revitalise town centres, particularly heritage and cultural assets, the contribution to smart growth.	Employment land review informs quantity and location of employment in CS8, town centres and smart growth addressed in policy CS7 and CS5.	CS5, CS7 and CS8
	Transport	Consideration should be given to the use of criteria in policy to ensure: opportunities to improve access by public transport, cycling and walking are maximised.	Policy CS10 point 6. CS17 travel options and accessibility.	CS10 and CS17
Submission 2008/9	Design	Issues were raised regarding design including addressing climate change, and issues of noise and light.	These are addressed at a strategic level in policies CS10. They will be addressed in further detail in DMP and Design and Parking SPD.	CS10 and DMP
	Green infrastructure	Issues were raised to be addressed in the Green Infrastructure Strategy including ways of addressing air quality issues and climate change consequences e.g. by SuDS	This will be addressed in the GI Strategy and in more detailed design guidance, e.g. in the DMP and design and parking SPD.	DMP
	Housing/ employment land	An issue was raised regarding a potential conflict between housing and employment land.	The figures in CS8 for each area reflect the most up to date evidence in employment land needs. The Submission 2012 document indicates that sustainable urban extensions may be required, should the supply of housing land in existing urban areas get short in the longer term.	CS8
Suggested amendments 2009	Climate change – urban heat island effect	CS1 – strengthen to include 'create' green space for areas of high density dwellings. CS7 (a) – Redhill, commit to Green Action Zone. CS9 - At a higher density this wording needs to be strengthened, including reference to % of green cover per development (10-20%), wind paths for movement of air etc.	CS10 (4) 'protect and enhance the green fabric'. CS12 aims to secure GI in line with GI strategy to include provision of new open space. Green infrastructure is also addressed throughout the DMP This appraisal was carried out on the SE plan requirements, which changed over time. This comment referred to the higher level of development.	CS10, CS12 and DMP
	Climate change – flash flooding	CS1 – strengthen to include 'create' greenspace for areas of high density dwellings. CS9 – At a higher density this wording needs to be strengthened to increase the level of greening in high density areas, and required design features	CS10 (4) 'protect and enhance the green fabric'. CS12 aims to secure GI in line with GI strategy to include provision of new open space. CS10 (10) addresses flood risk and covers all sources of flooding and managing flood risk in all new	CS10, CS12 and DMP

		to combat flash flooding in ALL new development.	development. Green infrastructure is also	
		CS7 (a) – Redhill, commit to Green Action Zone.	addressed throughout the DMP.	
	Water quality and	CS9 – At a higher density this wording needs to	CS10 (4) 'protect and enhance the green fabric'.	CS10, CS12
	quantity	be strengthened to increase the level of greening in high density areas, and required design	CS12 aims to secure GI in line with GI strategy to include provision of new open space. CS10	and DMP
		features to combat flash flooding in ALL new development. CS7 (a) – Redhill, commit to Green Action Zone.	(10) addresses flood risk and covers all sources of flooding and managing flood risk in all new development. CS was appraised at a higher figure for housing delivery. Green infrastructure is also addressed throughout the RAAP.	
	Wellbeing – privacy, amenity space	CS1 – strengthen to include 'create' green space for areas of high density dwellings. CS7 (a) – Redhill, commit to Green Action Zone.	CS10 (4) 'protect and enhance the green fabric'. CS12 aims to secure GI in line with GI strategy to include provision of new open space. Green infrastructure is also addressed throughout the RAAP.	CS10, CS12 and DMP
	Biodiversity – habitat severance/ destruction	CS9 – At a higher density this wording needs to be strengthened to increase the level of greening in high density areas. Biodiversity scoring similar to CS1 – strengthen to include 'create' green space for areas of high density dwellings. CS7 (a) – Redhill, commit to Green Action Zone.	CS10 (4) 'protect and enhance the green fabric'. CS12 aims to secure GI in line with GI strategy to include provision of new open space. CS2 protection and enhancement of SAC, SSSIs, LNRs, SNCIs and urban green spaces.	CS2, CS10 and CS12
	Congestion	CS16 (now CS15) – strengthen wording to reflect tariff contributions for transport investment. Monitoring success of travel plans.	This is addressed through CS10 and CIL	CS12
	Infrastructure	CS11 (now CS10) – strengthen wording to include reference to how infrastructure will be provided – e.g. Extensions to existing sites, or new sites?	This is addressed in the Infrastructure Delivery Plan (IDP).	CS12
	Heritage	The appraisal notes that although detail will be addressed in DMP / RAAP and Design and Parking SPD, the agenda should be set in CS2.	CS4 point e added to include protection and enhancement of historic environment and to ensure design reflects local heritage.	CS4
Proposed changes 2010	Major Developed Sites in the Green Belt	The criteria for this were included in the Schedule A & B revision – this led to a negative score relating to congestion.	This has been removed from the Submission 2012 version due to direction from the National Planning Policy Framework.	
	Housing density	Reference to urban extensions was removed for this version – this led to negative scoring for a number of objectives related to very high density development in the urban area, including urban open space, air quality and climate change.	Sustainable Urban Extensions have been reinstated in the Submission 2012 CS.	CS6

Outstanding Issues 2011	Green Belt	Any Green Belt boundary review would be appraised through the DMP. Alternative sites for release would need to undergo SA, wording of policy should trigger GB release only once PDL is saturated.	Wording in policy CS6 is clear as to the hierarchy of development land and need to consider wider sustainability implications as part of site allocation process.	CS6
	Green infrastructure	A GI Strategy must be in place to inform SA of alternative areas for a potential urban extension.	GI Strategy required in CS12	CS12
	Employment	Development for employment in Banstead is limited, if increased this may address some SA objectives highlighted by the SA of the Preston Planning Framework (e.g. employment needs)	The levels of development are informed by the economic market assessment, and levels for growth were informed by the Landscape and Townscape Character Assessment.	
	Biodiversity	Habitat creation should be addressed.	CS2 and CS4 aim to protect and enhance existing areas, CS12 commits to secure GI in line with what is set out in the GI Strategy.	CS2, CS4, CS12
Submission 2012	Affordable Housing	Reduction in Affordable Housing requirement to 30% led to recommendation to increase AH delivered on Sustainable Urban Extensions.	Addition of reference to consideration of maximising opportunities for AH through site allocations	CS15
	Sustainable development	CS8 - Recommended better cross referencing in the supporting text of CS8 to policy CS4 and possible sustainable urban extensions. Deletion of 'where possible' from CS8 bullet 1. Addition of sentence at end of CS8 making links between policy criteria and the assessment of potential urban extension sites.	All changes made as recommended	CS10
Further amendments 2012	Presumption in favour of sustainable development	There are some negatives, such as land contamination, biodiversity and landscape, where by the nature of development there will be some impact, particularly in the longer term with SUEs	Policy CS10 aims to minimise these negatives	CS10
	Green Belt and SUEs	Negative impacts associated with loss of Greenfield land can be mitigated through careful selection of location. Urban development/PDL should be prioritised	Cross reference between policies including to CS10. Site location will be tested as part of DMP. Inclusion of trigger points in CS13	CS10, CS13 and DMP
	Historic environment	There is potential conflict between the costs of affordable housing and costs or restoration (of a building / part of he site) affecting viability. here are conflicts recognised between the preservation of historic buildings / settings and the provision of	This is site specific and would need to be picked up through the DMP.	DMP

		some types of renewable energy infrastructure.		
	Gypsies and Travellers	Local need must be addressed as a priority, and consideration should be given to mechanisms for managing this through the DMP. Careful monitoring of need should be carried out to assess whether local need is being met through pitch provision.	Will be addressed through DMP	DMP
Proposed Modifications 2013	Sustainable construction	There will still need to be further guidance as to how his policy works with more restrictive policies such as heritage and landscape.	To be addressed through DMP/SPD	DMP

Annex 3 The reasons for choosing the plan, and other alternatives appraised

Stage of	Alternatives considered	Selected/rejected?	Reason for choice & SA/SEA conflicts identified
preparation			
	n in favour of sustainable development		
Further Amendments 2012	CS0 Presumption in favour of sustainable development	No alternatives appraised as this policy is required by the Planning Inspectorate	If proposed development that accords with policies in the development plan is granted then the majority of SA objectives score positively. There are some negatives in relation to as land contamination, biodiversity and landscape, where the nature of development means that there will be some impacts in the longer term, but other policies in the CS aim to minimise these impacts.
CS2 Valued land	scapes and the natural environment		
Issues and Options 2005	Continue to protect ecological, historical and aesthetically important areas (eg Green Belt, AONB), sites and structures	Selected.	Supported through public consultation. Ecological protection required by EU directive. Could restrict commercial development and restrict rural diversification schemes. Could result in pressure to release employment land for housing. Protection of AONB may restrict renewable energy development.
	Do not continue to protect ecological, historical and aesthetically important areas (e.g. Green Belt, AONB), sites and structures.	Rejected.	Contrary to national and international policy. This option was not supported through consultation Development in the Green Belt could increase car miles.
Preferred Options 2006	Continue to protect and enhance the borough's nationally protected areas including AONB, SSSIs and the SAC; Metropolitan Green Belt; SNCIs and Local Nature Reserves; Water Courses, and flood plains, which may contain important habitats. Biodiversity of wildlife species and habitats, including locally significant features such as ponds and veteran trees, Ancient Woodland, Protected Trees; Urban Open Land; and Wildlife corridors and valuable site-specific features such as hedgerows and riverside habitats.	Selected.	Supported through public consultation. Ecological protection required by EU directive. No conflicts identified at this stage.
Preferred Options 2008	Preferred Option 4: Protecting our valued landscapes and natural environment - The Preferred option will require continued protection and enhancement of AONBs, SSSIs and SACs, Green Belt, SNCIs and Local Nature Reserves, water courses, and flood plains, biodiversity of wildlife species and habitats, urban open space, wildlife corridors and valuable site-specific features such as	Carried forward with minor changes	Positive scoring across environmental and social SA objectives.

	hedgerows and riverside habitats.		
	Preferred Option 5: Green infrastructure - The Preferred Option is to ensure that an overarching strategy is established incorporating local open space standards and requirements for developments to contribute towards the delivery of a comprehensive multi functional Green Infrastructure network. The Council will need to work in partnership with the public, private and voluntary sectors, which will also necessitate achieving a range of targets in relation to climate change, access to nature, biodiversity, health and well-being.	Carried forward in concept through CS2 and CS12	GI policy would provide the clarity and criteria to help maximise benefits such as incorporating renewable energy technologies into the urban environment and making best use of open space
Submission 2009	The Council will conduct a comprehensive review of the Green Belt by 2012, taking into account the needs and demands for growth	Carried forward in concept	Housing pressures and minimum targets mean GB likely to be needed in longer term. Wording removed but sustainable urban extensions (possibly in the Green Belt) are now indicated in policy CS6.
Proposed Changes 2010	Changed to include AONB review and strengthened reference to Green Infrastructure Strategy – network of green space	Without AONB review (rejected), with AONB review (selected). Strengthening of GI Strategy reference (selected)	Scored positively in relation to social objectives for access to green space.
Submission 2012	Removal of 800m buffer surrounding SAC.	With buffer – Submission 2009 version (rejected) without buffer (selected) at request of NE.	Buffer was difficult to implement and justify.
Further Amendments 2012	Stand alone GB policy	New Green Belt policy (selected) or as part of CS1 (rejected).	Stand alone policy suggested by Inspector. Policy scores well in terms of housing provision (to address need) and climate change (to avoid increased urban intensification, and building on flood risk areas) because of the flexibility in releasing some GB land in the longer term (exceptional circumstances). Sustainability will depend on locations chosen.
Post Hearing Amendments 2013	Change to bullet point (b) to take account of possible future changes in landscape designations	Carried forward	No change to overall approach identified. Gives greater clarity to Council's intentions
CS3 Green Belt			
Post Hearing Amendments	Changes to parts (3) to (6) to provide more clarity and better alignment with national policy in relation to	Carried forward	(see also CS2) Provides clarity on Council's commitment to protect the GB and spatial strategy to build in the urban area first; greater

2013	the exceptional circumstances test, the Green Belt review process and the process for allocating and safeguarding land.		certainty due to cross referencing to other policies.
CS4 Valued tov	vnscapes and the historic environment		
Issues and Options 2005	Continue to protect ecological, historical and aesthetically important areas (e.g. Green Belt, AONB), sites and structures.	Selected.	Supported through public consultation. Ecological protection required by EU Directive. Protection of Green Belt may conflict with supply of affordable housing.
	Do not continue to protect ecological, historical and aesthetically important areas (e.g. Green Belt, AONB), sites and structures.	Rejected.	Contrary to national and international policy. This was not supported through consultation. Negative scoring related to biodiversity and historic environments /cultural assets.
	Require high quality design of landmark buildings and public spaces, allowing easy, safe and secure movement between places and facilities, with the needs of older persons and disabled people borne in mind.	Carried forward.	Positive environmental and social score. Required by national planning policy. Supported through public consultation. Potential conflict identified between renewable energy technologies and protective design policies. High quality design may impact viability.
	Do not require high quality design of buildings and public spaces promoting inclusive access, safety and security.	Rejected.	Scored negatively against the majority of social and environmental SA objectives compared to alternative
Preferred Options 2006	Protect conserve and enhance historic features and areas of historic importance and special character, including: Listed Buildings (including locally listed); Archaeological Sites; Historic Gardens; Conservation Areas; and Residential Areas of Special Character	Carried forward to Option 7 PO 2008.	Accords with national and regional guidance. The SA highlighted that a strict adherence to traditional design will restrict innovative design which may be required for lifetime homes, inclusive accessibility and climate change adaptation.
Preferred Options 2008	Preferred Option 7 Development, Protection of Character and Heritage and Urban Design - The Preferred Option is to require environmentally responsible design and construction including high quality design; the best use of the site; on-site renewable energy production; biodiversity; parking standards; and protection of Listed Buildings, Archaeological Sites, Historic Gardens, Conservation Areas; and Residential Areas of Special Character.	Carried forward to submission 2009.	Helps to secure benefits in relation to the spatial location of development
Submission 2012	Increased focus on heritage	With increased reference to heritage (selected), without (rejected)	No significant change to appraisal score identified. Reflects findings of SA report at submission 2009 that CS2 should be setting the agenda with regards to heritage.
Further Amendments 2012	Further strengthening of heritage and historic environment	Stronger reference to heritage (selected), without stronger reference to heritage	Positive scoring in relation to heritage objective. Possible conflicts identified with viability and renewable energy infrastructure. Address through DMP.

		(rejected)	
CS5 Valued pe	ople and economic development		
Issues and Options 2005	Review the Council's existing allocation of employment land to determine those sites required for employment purposes and those suitable for reallocation to other uses.	Economic Market -	Economic Market Assessment carried out in 2008 to inform further stages of the CS.
	Relax the Council's current policy on the protection of employment land whilst seeking to retain identified key strategic sites and sites in town centres (accepting that mixed use redevelopment may be acceptable on town centre sites)?	The option of seeking to retain identified key strategic sites and sites in town centres was carried through to PO	Retaining sites in town centres would help in the promotion of mixed-use development. There is conflict identified between losses of potential employment land to housing – although this option was identified as positive for directing land use to PDL.
	Do not relax the Council's current policy on the protection of employment land whilst seeking to retain identified key strategic sites and sites in town centres (accepting that mixed use redevelopment may be acceptable on town centre sites)?	The option of seeking to retain identified key strategic sites and sites in town centres was carried through to PO	The SA commented that this could force residential development onto greenfield sites. Retention of sites could retain flexibility and longer term development opportunities
	Continue the current focus of regeneration initiatives in the borough on areas such as Redhill Town Centre and borough housing estates.	Carried forward	In line with Corporate Plan objectives. Option scores positively over the whole range of sustainability criteria. Provides more substantial opportunities to improve the social, economic and environmental fabric.
	Broaden the current focus of regeneration initiatives to include smaller areas in the borough that are not reaching their potential.	Noted potential for improvement in social objectives but no new regeneration areas have been identified.	The SA concluded that although regeneration activity in these smaller areas may not meet such wide-ranging benefits as that in larger areas, the improvement in social terms is likely to be significant
Preferred Options 2006	Include policies that provide for the more efficient re- use of existing employment land, subject to the results of an employment land review.	Carried forward to PO 2008 (Option 8)	Positive impact on a range of economic objectives. Potential conflict identified between the use of land for business and land available for housing. Policy should be more defined relative to right amount, range, size etc.
	Include a commitment to work with parties, such as South East Economic Development Agency, the Surrey Economic Partnership and Surrey University to identify employment needs and facilitate the provision of appropriate accommodation such as starter units.	Not carried forward to PO 2008, but picked up again in principle in Submission 2009 (CS3)	Potential conflict identified between the use of land for business and land available for housing. Policy should be more defined relative to right amount, range, size etc.
Preferred Options 2008	Preferred Option 10 Regeneration - The Preferred Option is to regenerate Redhill and Horley town centres as a focal point for a mix of uses with high	Carried forward to policy CS3.	To not consider regeneration in the future could jeopardise the national and regional requirements to achieve an urban renaissance and positively influence place shaping. SA identified the importance

	quality environments. Regenerate Preston and Merstham to enhance community facilities and improve the quality of life for residents. Proposals should increase accessibility and incorporate sustainable design.		of design in ensuring urban open space, the public realm and green infrastructure to balance a policy of high density housing
Outstanding Issues 2011	Addition of reference to 'community support', recognition of distinct economic roles of different parts of the borough. Range and type of start-up premises, best use of employment land, use of LDOs	Rewritten policy CS3 (selected), PO 2008 version (rejected).	Updated to reflect economic evidence base update, changing policy landscape and new Corporate Plan. Air quality and traffic congestion identified in relation to development of Redhill TC.
Post Hearing Amendments	Point e: 'existing' employment land 'particularly' within town centres	Gives greater clarity to Council's intentions	No change to overall approach identified. Gives greater clarity to Council's intentions
	of land for development		
Issues and Options 2005	Build housing in a similar way to much of our existing urban areas, i.e. mainly detached and semi- detached housing, using pockets of underdeveloped land, previously developed non-residential land, and small pockets of the Green Belt.	Rejected.	Building in Green belt not supported by consultation at this stage. The SA commented that building in the Green Belt may increase car use.
	Use a mix of mainly higher density housing (terraces, townhouses and flats) using pockets of underdeveloped land, previously developed non-residential land, but not the Green Belt.	Carried forward in combination with other options.	This option could be enhanced by ensuring that development is allied to public transport provision and at a density sufficiently high (40+ dph) to create potential viability for combined heat and power
	Allow very high-density housing (flats) in areas of high public transport accessibility, i.e. in town centres and along the A23 Transport Corridor, reducing the amount of development in other urban areas and not using the Green Belt.	Carried forward in combination with other options	Scored similarly to option above although may not provide such varied accommodation
	Combine Options 2 and 3 Allowing very high-density housing in town centres and along the A23 Transport Corridor, a mix of mainly higher density housing in other urban areas and safeguarding the Green Belt.	Carried forward in combination with other options	As above.
Preferred Options 2006	Direct higher density residential development to Redhill and along the A23 Corridor, formulating appropriate housing density ranges for these areas and the rest of the Borough, after taking into account a range of factors (the character of areas, public transport, public services, resource efficiency and environmental impacts).	Carried forward to PO 2008	The air quality risk of placing homes very close to busy roads needs to be further assessed and appropriate measures taken. Neither the issues of noise or light appear to be addressed elsewhere in the preferred options. There are no measures advocated to reduce the risk of pollution into the Borough's rivers/watercourses. Opportunities to further reduce the ecofootprint of regenerated urban areas should be sought.
Preferred	Preferred Option 1 Spatial location of development	Carried forward into	Preferred Option has strong sustainability attributes, in particular the

Options 2008	Sustainable levels, locations and forms of development will be sought in accordance with the stated objectives of this strategy and the objectives and policies of the South East Plan and the New Growth Points objectives. Strategic development in the borough will be directed to the following hierarchy of areas in the Borough: Redhill – as the Primary Regional Centre and a Regional Transport Hub, Reigate; Horley; and Banstead Village – as a focus for Town Centres Regeneration in the areas of Redhill Town centre, Horley Town Centre, Preston and Merstham. Two new neighbourhoods in Horley Other sustainable locations in the existing urban area	policy CS4	delivery of affordable housing in locations with good accessibility, the opportunity to enhance cultural assets, heritage and a sense of place in urban areas. Consideration should be given to the use of criteria in policy to ensure: quality of urban open space/public realm/green infrastructure, delivery of affordable housing, flood risk is addressed in Redhill and Horley, infrastructure matches development in the long term, opportunities to improve access by public transport, cycling and walking are maximised, noise and light nuisance is limited, provision of open space in accordance with Natural England's ANGST and to avoid increased recreational pressure on the Reigate to Mole Valley Escarpment SAC.
	Preferred Option 12 Strategic Location of Housing - The Preferred Option is to direct higher density residential development to Redhill and in the urban areas, along the A23 Corridor, formulating appropriate housing density ranges for these areas and the rest of the Borough, after taking into account a range of factors (the character of areas, public transport, public services, resource efficiency and environmental impacts).	Carried forward into policy CS4	Identified the importance of maximising the use of rail and bus to avoid over reliance on cars and that high potential exists for bus priority measures and improvement of quality and frequency of train services Scored favourably provided development was in sustainable locations. These options could be enhanced by ensuring that development is aligned to public transport provision and at a density of 40+ dph which would enable combined heat and power.
Proposed Changes 2010	Policy CS5 (now amalgamated with policy CS4) but with Sustainable urban extensions removed.	Option with urban extensions (rejected). Without SUE (selected)	SUEs rejected at this stage due to SHLAA evidence suggesting growth could be accommodated in urban area. As the housing number was the same the SA scored negatively in relation to a number of identified issues associated with high density living in the urban area including climate change, noise and light.
Outstanding Issues 2011	References to sustainable urban extensions (SUE) reinstated.	With urban extensions (selected). Without SUEs (rejected)	Due to SHLAA revisions showing less urban capacity than previously suggested, alternative options for housing delivery were explored. SUEs identified as a last resort once PDL had been utilised. SA identified that the most accessible locations should be sought, which would lead to minimal increases in car miles. A potential negative impact is the loss of soil quantity and quality, particularly if the development was on agricultural land, although care can be taken so as to not irreversibly affect the soil. This development scenario would gain greater sustainability credentials if the scale of the development allowed for supporting infrastructure that would reduce the need for travel such as shops, community and leisure facilities and schools.

	Broad locations for development	No more housing beyond SHLAA figures (rejected), Residential areas (rejected), UOL (rejected), flats above shops (rejected), Rural surrounds of Horley (selected), SUE into the GB (selected)	Negative scoring was given for limiting housing numbers in respect of the economy; The SA supports the overall strategy of directing development to urban areas in the first instance, as an aid to regeneration, and urban sources of supply were recognised to have the potential to provide a sustainable source of supply to a limited degree, however the only options capable of delivering the quantity required were RSH and SUEs.
Further Amendments 2012	Different scales of Urban Extension / stand alone / employment land.	None of the scales of urban extension were rejected at this stage due to no location given (concept only), employment land (rejected), stand- alone (rejected)	At this stage the different scale options depended on the location. Stand alone settlement rejected due to only feasible locations being not near transport corridors, train stations etc.
	Broad Areas of Search for SUEs	Preferred areas of search selected	See Sustainable urban extension SA report.
Post Hearing Amendments 2013	Removal of specific figures for urban extensions from policy. Reference to policy CS8 removed	Carried forward	No change to overall approach/ strategy. Clarifies Council's approach of urban areas first and priority locations for growth and regeneration.
CS7 Town and I	ocal Centres		
Preferred Options 2006	Include policies that reinforce the multi-purpose role of town centres and local shopping areas by retaining and increasing provision of retail, social, community and leisure uses.	Carried forward to PO 2008	This policy was included at PO stage to reflect national guidance. There was no alternative at previous stages. Conflicts may occur with SA objective to decrease congestion.
Preferred Options 2008	Preferred Option 9 Regional, Town and Local Centres - The Preferred option is to include policies that reinforce the multi-purpose role of regional, town and local centres by retaining and increasing provision of retail, social, community and leisure uses. Accommodate the majority of comparison growth in Redhill Town Centre. Accommodate appropriate trade offs encouraging vitality and viability to aid regeneration in Redhill and Horley Town Centres.	Carried forward to submission 2009	SA commented that this policy could have a significantly beneficial effect on improving accessibility to all services and facilities, as well as facilitating the improving health and wellbeing of the whole population and reducing poverty and social exclusion. However, concerns were raised about the unhealthy conflict between the wishes to increase the vitality and vibrancy of the town centre, and reduce the need to travel. It was suggested that the effects of travel would be unpredictable, suggesting that in increasing numbers of people using the town centres, car use may be increased. Policy options should be directed at reducing private car use. Addressed in CS15.

Outstanding	Minor changes made for clarity and figures changed	Selected	Amended for additional clarity and to reflect the revised retail and
Issues 2011	to reflect revised evidence.		leisure evidence base. Resulted in no change to SA scoring.
Post Hearing Amendments	Addition of 'including culture and tourism'.	Selected	This wording contributes what was lost through revocation of the SE Plan. No change to overall approach/ strategy.
CS8 Areas 1, 2	a, 2b and 3	·	
Area based poli	cies were established through evidence provided by the L	andscape and Townsca	ape Character Assessment (June 2008)
Issues and Options 2005	Adopt a retail led strategy for regenerating and revitalising Redhill Town Centre, requiring a significant expansion of shopping in terms of quantity and range, in an effort to compete with Crawley / Croydon and complement Reigate.	Redhill options carried into RAAP process.	Competition for land with housing. There would be less balance of uses. May exacerbate the lack of activity and natural surveillance. Retail would increase traffic, thereby reducing air quality. Additional retail may encourage additional consumption.
	Adopt a business and employment-focused strategy for regenerating and revitalising Redhill Town Centre that aims to consolidate the employment area and make it more successful and attractive for companies and staff.		Competition for land with housing. May exacerbate the lack of activity and natural surveillance. Development would increase traffic, thereby reducing air quality.
	Adopt a leisure led strategy for regenerating and revitalising Redhill Town Centre, building on the existing theatre and on the medium scale of the town centre and its pedestrian qualities.		Competition for land with housing.
	Adopt a residential led strategy for regenerating and revitalising Redhill Town Centre, aimed at finding a balance between shopping, offices and people living in the centre.		Wider social benefits for option below.
	Adopt a strategy for regenerating and revitalising Redhill Town Centre that contains elements of all of the above strategies with a strong focus on leisure and culture.		Balanced mixed-use strategy with a strong focus on culture and leisure was assessed as more likely to meet the wider needs of the local population.
	Focussed regeneration (F2a). No focus on regeneration (F2b)	Focussed regeneration (selected), No focus on regeneration (rejected)	Option F2a scores positively over the whole range of sustainability criteria A focussed approach could target areas of deprivation.
Preferred Options 2008	Preferred Option 9 'Regional, local and town centres'	Selected	Regeneration could deliver social, economic and environmental benefits and a focussed approach could target areas of deprivation. This hybrid option allows regeneration initiatives to target areas of deprivation.
	Preferred Option 10 'Regeneration'	Selected	Responds to the need for environmental improvement and to maximise the benefits of access by public transport.
Submission	Area based policies	Selected	Development in Redhill, Reigate, Horley and Banstead will make a

2009			substantial contribution to providing sufficient housing to enable people to live in a home suitable to their needs and which they can afford. That the provision of housing, employment and retail is in the most accessible parts of the Borough further supports this objective. Site allocation DPDs will need to address detailed issues.
Outstanding Issues 2001	Policy restructured and updated to reflect latest evidence on housing, employment and retail.	Selected. Leaving figures unchanged - rejected	Figures changed to reflect latest evidence on housing, employment and retail. At this strategic level of appraisal it was not considered that these changes significantly affected the overall appraisal score. See also CS6 (strategic locations for growth)
Further Amendments 2012	Figures updated	Selected. Leaving figures unchanged - rejected	Figures changed to reflect latest evidence on housing, employment and retail. At this strategic level of appraisal it was not considered that these changes significantly affected the overall appraisal score. See also CS6 (strategic locations for growth)
Post Hearing Amendments 2013	Changes made subsequently to the description of employment development opportunities and expression of employment land targets to reflect need for a flexible approach Para changes to rectify inconsistency in relation to housing figures and provide clarity about urban areas first approach.	Carried forward	No change to overall strategy or SA score – there will be further SA/SEA testing through site allocations. Allocation of sites will be guided by sustainability criteria from CS10 and policy CS6.
CS9 Gatwick A			
Issues and Options 2005	Continue to support a one runway, two terminals airport at Gatwick.	Carried forward to PO	SA concluded that the existing airport will continue to attract an increasing number of passengers annually, which will see a continuation of environmental problems into the foreseeable future e.g. poor air quality in some parts of Horley. Resisting a further runway will encourage more effective use of the facility. The effect of increasing passenger numbers on the rail and road network capacity should not be underestimated in relation to this option.
Preferred Options 2006	Continue to support a one runway, two terminals airport at, subject to satisfactory environmental safeguards being in place.	Carried forward to PO 2008 Option 21 Aviation	Not appraised as no change since I&O 2005 appraisal.
Preferred Options 2008	Support the development, within the Gatwick airport boundary, of facilities which contribute to the safe and efficient operation of the airport as a single runway, two terminal airport only. Oppose expansion at Gatwick Airport and intensification of Redhill Aerodrome.	Carried forward to Submission	Same as previous appraisal, and it was additionally considered that it was not of any additional value to appraise Redhill Aerodrome separately since the site lies in the Green Belt and significant intensification of development would be inappropriate. Planning applications are lodged in tandem with Tandridge DC and reference should be made to the Tandridge Core Strategy for comparable policy approach.
Submission 2009	Continue to support a one runway, two terminals airport at Gatwick.	Selected	Whilst it is recognised that Gatwick Airport lies outside the administrative area of Reigate and Banstead Borough Council, appraisal has identified that there could be adverse impacts within

			the Borough and that there is uncertainty concerning how significant these might be.
CS10 Sustainal	ble Development		Ŭ
Issues and Options 2005	Require more environmentally responsible design and construction practices in the borough (waste, water, energy, air, adaptation to climate change etc.).Do not require more environmentally responsible 	Carried forward Rejected	Gains a maximum score in both its ability to protect the environment, reduce the use of finite natural resources, as well as being able to contribute to social well-being through alleviating fuel poverty and reducing the cost of utilities. Small conflict with viability. Scored negatively against the majority of SA objectives.
	change etc.)		
Preferred Options 2006	Include policies requiring more environmentally responsible design and construction practices in the Borough (waste, water, energy, air, adaptation to climate change, biodiversity etc.) including: A requirement to provide for a proportion of the development's energy needs using on-site renewable energy generation; A criteria based approach for encouraging stand alone renewable energy schemes; and Protecting and enhancing existing areas of biodiversity value and links between them where appropriate.	Carried forward to PO 2008	Local distinctiveness can be a significant barrier to the challenges of climate change in particular. Requirements to incorporate renewable energy technology into individual buildings will undoubtedly involve new technology, some of which will need to be mounted on roofs/above ridgelines. Climate change adaptation may mean the use of non-traditional materials
Preferred Options 2008	Preferred Option 2 Sustainable Development Principles - The Preferred Option will set out sustainability criteria against which all proposals will be assessed. This will include making efficient use of land, including the use of previously developed land; minimising the impact on natural resources; multi- functional green infrastructure network; minimising the need to travel, whilst increasing opportunities to walk, cycle or use public transport; address the causes and consequences of climate change; protecting and enhancing the quality of the natural and built environment; and ensuring effective services, infrastructure and transport options.	Carried forward into CS8	Local distinctiveness can be a significant barrier to the challenges of climate change in particular. Requirements to incorporate renewable energy technology into individual buildings will undoubtedly involve new technology, some of which will need to be mounted on roofs/above ridgelines. Climate change adaptation may mean the use of non-traditional materials
	Preferred Option 7 Development, Protection of Character and Heritage and Urban Design - The Preferred Option is to require environmentally responsible design and construction including high quality design; the best use of the site; on-site	Carried forward into CS8; heritage in CS3 (submission 2009)	The Preferred Option has not been specifically appraised since it is a checklist of a range of PPS criteria rather than a true option. A key finding of the appraisal of the spatial location of development (Preferred Option 1), however, identified the importance of design in ensuring urban open space, the public realm and green

	renewable energy production; biodiversity; parking standards; and protection of Listed Buildings, Archaeological Sites, Historic Gardens, Conservation Areas; and Residential Areas of Special Character.		infrastructure to balance a policy of high density housing.
Submission 2012	Additional points were added to the policy relating to neighbourhoods, pollution and climate change.	Revised policy (selected) Policy as submission 2009 (rejected)	Policy selected to increase sustainability credentials and address issues raised as part of SA process. In appraising this policy recommendations were given for the Sustainability checklist (DM).
Post Hearing Amendments	Additional sentence to point 7 regarding renewable energy/ fuel production	Selected	Addition of reference lost through revocation of SE Plan Previous SA/SEA reports (Preferred Options 2008) had highlighted a potential conflict between landscape and heritage assets which this now addresses.
CS11 Sustainat	ble Construction	•	
Issues and Options 2005	Require commercial and residential developments to provide a set proportion of their energy requirements by on-site renewable resources (solar panels, wind turbines etc).	Carried forward to PO	The policy scores positively relative to its contribution to mitigating the causes of climate change and reducing the whole-life costs of energy, as well as aiding security of energy supply.
	Do not require commercial and residential developments to provide a set proportion of their energy requirements by on-site renewable resources.	Rejected	Scored negatively against a number of SA objectives.
	Support and encourage the development of both waste recycling and renewable energy technologies in appropriate locations in the borough.	Carried forward to Preferred Options	This option scored positively, with additional comments regarding the use of organic waste as energy.
Preferred Options 2008	Preferred option 6 Sustainable construction - The Preferred Option is to ensure the reduction of the consumption of natural resources and to help deliver the aim of the Sustainable Community Plan, which is to promote zero and low carbon development and bring about environmental improvements in existing buildings. The following levels of the Code for Sustainable Homes and BREEAM will be required: • Up to 2010 Level 3 CSH and BREEAM good • Between 2010 – 2013 CSH Level 4 and BREEAM)Very Good • Between 2013 – 2016 CSH Level 5 and BREEAM Excellent In addition, a reduction in carbon dioxide emissions through the use of on-site renewable energy technologies at no less than 10% for all new developments; and be carbon neutral, with any shortfall being met by a	Carried forward with minor changes to Submission 2009.	The likely benefits of the sustainable construction Preferred Option are improved water quality; reduced flood risk; enhanced biodiversity and 'natural environment' in urban areas; energy efficiency and reduced fuel poverty. The ability to deliver sufficient quantity of homes and commercial land the position should be monitored.

	financial contributions to enable residual carbon emissions to be offset elsewhere in the Borough.		
Submission 2009	Updated to reflect buildings regulations requirements	Carried forward	Due to comments from the Inspector at the Examination in 2009 – the policy was not justified and lacked clarity. The ability to deliver sufficient quantity of homes and commercial land the position should be monitored. The suggestion was made to include a reference to clarify the parameters and priorities where abnormal costs of development may arise.
Submission 2012	Updated to reflect current building regulations requirements	Selected	The requirements of the policy at Submission 2009 were overtaken by building regulations requirements. The SA recommended that certain elements of CSH should be maximised in particular areas, through the DMP.
Further Amendments 2012	Policy wording amended including provision for site specific measures and district heating networks.	This was selected with changes made for clarity.	It was considered that the changes made to policy do not constitute a significant alteration in the sustainability credentials of this policy. Scoring of this policy remains the same as the submission (2012) version.
Post Hearing Amendments 2013	Rewording of policy to provide flexibility in taking account of the viability of proposals and commitment to partnership working	Carried forward	Provide clarity about Council's approach and around the need to take account of viability and feasibility.Previously there had been conflict identified between provision of affordable housing, market housing and the requirements of this policy. The addition of acknowledgment of feasibility and viability creates more flexibility which will reduce this conflict. There will still need to be further guidance as to how this policy works with more restrictive policies such as heritage and landscape (DMP).
CS12 Infrastruc	ture		
Issues and Options 2005	In areas in need of important community facilities and services consider the provision of facilities on urban open spaces surplus to requirements Do not, in areas in need of important community facilities and services, consider the provision of facilities on urban open spaces surplus to requirements.	Provision of facilities on Urban Open Land has been rejected Carried forward to PO	Could conflict with biodiversity, loss of parkland/ allotments, must take account of flood risk. May result in permanent loss of green space. Term 'surplus to requirements' needs evidence. Green space may benefit social well being as much as community facilities.
Preferred Options 2006	'Plan, monitor and manage' the overall supply of new residential development in the Borough, setting out an intention to phase the rate at which large sites come forward for development, in order to ensure that development does not outstrip the capacity of local infrastructure and services.	Carried forward to PO 2008	The Sustainability Appraisal concluded that it was appropriate to require contributions to meet the needs of new developments.
	Encourage proposals that would increase the range or improve the quality and accessibility of community	Carried forward to Submission 2009	Potential conflict was identified between the necessary requirements of new infrastructure and constraints posed by the existing

	and leisure facilities in the Borough, and proposals that provide for a mix of compatible community services on a single site. The loss of existing leisure and community facilities would only be considered within this context or where it can be clearly demonstrated that a need no longer exists.		fabric/character assessments
	Work with infrastructure and service providers and developers, to establish a programme for the adequate provision of new community facilities and infrastructure within the Borough.	Carried forward but through implementation part of CS11 Submission 2009	The Sustainability Appraisal concluded that it was appropriate to require contributions to meet the needs of new developments.
	Secure contributions from new development (both big and small) towards the infrastructure required to meet the needs created by new development.	Carried forward to Submission 2009	The Sustainability Appraisal concluded that it was appropriate to require contributions to meet the needs of new developments.
	It is proposed that the Core Strategy includes a commitment to review and seek to improve (where necessary) the quality and accessibility of our parks and play facilities.	Carried forward to Submission 2009	Protection and enhancement of natural, archaeological, historic environment and cultural assets can introduce potential conflict with the delivery of new community infrastructure.
Preferred Options 2008	Preferred Option 3 Plan Monitor Manage Option - Sustainable levels, locations and forms of development will be delivered at a rate which reflects the adequacy of infrastructure and services to meet the needs of the development or alongside the ability to provide new or upgraded infrastructure.	Carried forward to Submission 2009	Appraisal identified strong sustainability attributes and that adverse impacts are unlikely. The policy wording could emphasise how the infrastructure provided could be more in line with 'sustainable living' and give a greater indication of how adaptation to climate change could be incorporated.
	Preferred Option 16 Community Facilities and Infrastructure - The Preferred Option is to encourage proposals that would increase the range or improve the quality and accessibility of community and leisure facilities in the Borough, and proposals that provide for a mix of compatible community services on a single site. The loss of existing leisure and community facilities would only be considered within this context or where it can be clearly demonstrated that a need no longer exists. Policy would also cover contributions from new development towards the infrastructure required to meet the needs created by new development.	Carried forward	The preferred approach is in line with the Issues and Options and Preferred Options sustainability appraisal objectives. The Government has favoured the CIL approach, as it would capture more planning gain to finance additional investment in local and strategic infrastructure while preserving incentives to develop.
Submission 2009	Infrastructure Delivery including Community Facilities	Carried forward	A strategy of encouraging mixed development and community facilities provides a strong basis for safe and inclusive communities. Policy will work in combination with the locational strategy and to

Outstanding Issues 2011	UOL considered as land for housing delivery.	Rejected	 improve accessibility by public transport, walking and cycling, helping to address concern that high density development could contribute to congestion. When further developing the approach to contributions and tariffs, consideration should be given to the impact of abnormal costs. Negative scoring mostly against social and environmental objectives. Noted that some urban green space is inaccessible; development of a small part of one site can enable improvements in access to the rest of it, for use as recreation land. This will improve the amenity value of the land, but not the value for biodiversity, and
Further Amendments 2012	Urban Open Land review criteria	Criteria for UOL review (selected), policy with no criteria for review (rejected)	should therefore be assessed on a site by site basis. There are conflicts between different types of land use highlighted in this appraisal; however the benefits to the existing population of safeguarding UOL far outweigh these, such as health and wellbeing benefits, and climate change impacts
CS13 Housing I		· · · · ·	
Preferred Options 2008	Preferred Option 11 Housing Delivery. To deliver numbers as put forward by SE plan panel report August 2007 (New Growth Point status)	SE plan figure changed – not carried forward for this reason.	NGP status required us to deliver housing at an accelerated rate; this rate of delivery was in line with levels of applications for acceptable development at the time. There is a risk of an overprovision of small units. In addition design criteria may be necessary to ensure quality of urban open space, the public realm and green infrastructure. It may be necessary to consider measures to avoid or mitigate increased recreational pressure on the Reigate to Mole Valley Escarpment SAC. Consideration should be given to including flood risk infrastructure within the policy, with particular reference to Redhill and Horley.
Submission 2009	Housing figure of 9,240 put forward in draft SE plan	Selected	Housing delivery figure in line with regional strategy. SA commented that sustainability issues arising from increased level of housing development could be addressed through design.
Post submission changes 2009	Housing figure of 10,000 and 12,500 tested post submission	Tested for flexibility	Higher housing figure was tested to post submission 2009 in order to prove some level of flexibility in the housing figures, this also coincided with removal of reference to urban extensions in policy CS4. This led to conflicts related to high density development in the urban area – such as flood risk, air quality, green space and noise and light pollution.
Outstanding Issues 2011	Range of housing delivery tested from 300pa to 980pa	420-500pa. range was selected	Achieved highest positive score. SA issues related to not providing enough affordable housing at the lower end of the scale, and at the higher end of delivery scale issues associated with flood risk, air quality, green space and noise and light pollution were commented on, although it was acknowledged that these issues could be

			addressed through design.
Post Hearing Amendments 2013	Additional changes proposed to (3) and (4) to provide clarity to how urban extension sites will be allocated and to provide greater clarity about the trigger points for release of urban extension sites.	Carried forward	No change to overall approach/ strategy. Much of the intent of this new wording was previously contained within CS4.
CS14 Housing	needs of the community		
Issues and Options 2005	Build housing in a similar way to much of our existing urban areas, i.e. mainly detached and semi- detached housing, using pockets of underdeveloped land, previously developed non-residential land, and small pockets of the Green Belt.	Rejected.	Building in Green belt not supported by consultation at this stage. The SA commented that building in the Green Belt may increase car use.
	Use a mix of mainly higher density housing (terraces, townhouses and flats) using pockets of underdeveloped land, previously developed non-residential land, but not the Green Belt.	Carried forward in combination with other options.	This option could be enhanced by ensuring that development is allied to public transport provision and at a density sufficiently high (40+ dph) to create potential viability for combined heat and power
	Allow very high-density housing (flats) in areas of high public transport accessibility, i.e. in town centres and along the A23 Transport Corridor, reducing the amount of development in other urban areas and not using the Green Belt.	Carried forward in combination with other options	Scored similarly to option above
	Combine Options 2 and 3 Allowing very high-density housing in town centres and along the A23 Transport Corridor, a mix of mainly higher density housing in other urban areas and safeguarding the Green Belt.	Carried forward in combination with other options	As above
Preferred Options 2006	Secure the right mix of new housing sizes and types in the Borough to meet identified shortfalls in different areas; and to meet future needs.	Carried forward to PO 2008	At both Issues & Options and Preferred Options consultations there was strong support for providing the right mix and types of new housing.
Preferred Options 2008	Preferred Option 13 Providing the Appropriate Type and Housing Mix - The Preferred Option is to seek to secure the right mix of new housing sizes and types in the Borough to meet identified shortfalls in different areas; and meet future needs.	Carried forward to submission 2009	The Sustainability Appraisal concluded that it was appropriate to seek to meet housing needs.
Submission 2009	Included reference to identified needs, including those of the elderly and the need for extra care homes.	Carried forward	Policy addresses concern that too many 1 and 2 bed properties are being built .Strongly supports the objectives of meeting housing need, social inclusion and health and is not likely to result in any significant adverse impacts.
CS15 Affordabl			
Issues and	Lower the threshold size at which new housing	Carried forward	Option much more likely to provide an increased and long-term

Options 2005	developments are required to provide affordable housing.		supply of affordable housing
	Do not lower the threshold size at which new housing developments are required to provide affordable housing.	Rejected	In the longer term supply of larger sites may be reduced and therefore limited affordable housing will be delivered.
	Increase the percentage of affordable housing required on new housing developments that trigger the threshold.	Carried forward	Option increases the overall provision of affordable housing, however the degree of social stratification will be worse. Also the viability and longer-term supply could be affected as a result of the higher financial burden on specific sites.
	Do not increase the percentage of affordable housing required on new housing developments that trigger the threshold.	Rejected	A continuation of the existing threshold means that the longer-term supply is at risk, as the number of these larger sites is finite.
	Provide affordable housing on Greenfield sites as an exception to current policy.	Rejected	SA commented on conflicts of accessibility, flooding, soil quality and quantity, biodiversity, air quality, the need to travel and ecological footprint.
	Require payments towards affordable housing from new commercial development.	Rejected	Although the Issues and Options sustainability appraisal was equivocal about the value of this option, the Council considers that the risk of making commercial development proposals unviable outweighs the possible benefits of this approach.
	Provide affordable housing on employment sites as an exception to current policy.	Rejected	Conflicts with levels of employment, local employment opportunities, and commercial development.
	Do not provide affordable housing on employment sites as an exception to current policy	Carried forward to support draft objective 4 (PO 2006)	More sustainable than alternative option assessed
Preferred Options 2006	Include an affordable housing policy that requires all new housing developments comprising 15 dwellings or more to provide at least 35 per cent of housing as affordable; and for housing developments that fall below 15 dwellings, require a financial contribution towards affordable housing so that it can be provided elsewhere in the Borough.	Carried forward but % increased to 40% for PO 2008	There was concern that additional costs of affordable housing could limit funding for the introduction of sustainable energy measures. Also there was concern regarding potential conflict between the needs of residents (e.g. mobility; climate change adaptation) and the character of an area/local distinctiveness.
	Set out an appropriate mix of affordable housing to be provided as social rented, affordable home ownership and / or intermediate rented accommodation.	Taken forward to PO 2008	As H4 above
Preferred Options 2008	Preferred Option 15 Affordable housing 15 dwellings or more to provide at least 40 per cent of housing as affordable;	Carried forward to Submission 2009	Support for more affordable housing across all social SA objectives. Different threshold levels and percentages of affordable housing required by a development were considered in the Affordable Housing Viability Study. These were also tested against other factors such as the requirement to make infrastructure contributions.

Submission 2012 Post Hearing Amendments	30% affordable housing on sites of 15 or more Change of wording to bullet point 3.d. and 4.	30% AH (selected) 40% - as submission 2009 (rejected) Carried forward	 This preferred approach is in line with the Issues and Options sustainability appraisal recommendations. % reduced as a result of viability testing. SA recommended increasing AH provision on SUE to make up shortfall. Change made to supporting text of CS13 to do this. No change to overall approach/ strategy. The addition to point 4 introduces flexibility in achieving best quantity and mix of affordable housing relative to individual sites.
Preferred	Travellers and Travelling Showpeople Include policies for those groups with special	Carried forward.	Not appraised at this stage. The East Surroy authorities considered
Options 2006	housing needs, including setting out how the Council would consider proposals for gypsy sites in the Borough, taking into account the Gypsy and Travellers housing needs joint study.		Not appraised at this stage. The East Surrey authorities considered two options for the distribution of additional pitches. Mixed comments about the need for adequate provision, the need for research and evidence about accommodation needs, and the use of Green Belt in special circumstances – Gypsies and Travellers.
Preferred Options 2008	Preferred Option 14 Gypsies and Travellers and Travelling Showmen - The Preferred Option, taking into account the East Surrey TAA joint study, is to make provision for sites which meet an identified need that cannot reasonably be met on an existing or planned site; does not prejudice residential use or amenity; does not dominate the nearest settled community; can be adequately accessed by vehicles towing caravans and there is safe pedestrian and cycle access to the site; has reasonable accessible to local shops, medical services, schools and other community facilities on foot, bicycle or public transport; and, in the case of Travelling Showpeople, the site is suitable for the storage of large items of mobile equipment. Consideration will first be given to limited expansion of existing private sites in the Borough. There is a presumption against the development of Gypsy and Traveller sites (including Travelling Showpeople) in the Green Belt unless there are very special circumstances.	Carried forward to Submission 2009	Where sites are provided in more urban locations, there would be improved accessibility and integration. The criteria provide an appropriate range of consideration to ensure adverse impacts can be avoided.
Submission 2009	As PPA 14 with changes for clarification	Carried forward	As above.
Proposed Changes 2010	The policy was rewritten to include locally arising needs, sequential approach to allocation, suitability criteria for allocation and safeguarding sites from	Partly selected with modifications.	Modifications suggested by Inspector. Scored well for consideration of space for business needs and for considering urban areas first for the sites, thereby giving good access to facilities and services,

	development unless no longer required.		reducing social exclusion and the need to travel
Further Amendments 2012	Inclusion of 5 year supply of pitches / plots	With 5 year supply (selected); without 5 year supply (rejected)	Selected as in line with national guidance, Local need must be addressed as a priority. Scored well due to increased access to schools and healthcare.
Post Hearing Amendments 2013	Changes to test to clarify approach to exceptional circumstances and to refer to updated evidence.	Carried forward	Previous appraisal comments have not changed due to the new paragraph wording, however, there is a greater likelihood of the travelling community's needs being met through the increased requirements indicated by the new TAA (2013).
CS17 Travel op	tions and accessibility		
Issues and Options 2005	Require developments with potential to generate a lot of traffic to include measures to minimise car use, for example subsidies for public transport, provision for cycling, car sharing schemes and less car parking.	Carried forward	Option gained a significantly positive score, not only on environmental considerations, but social objectives as well.
	Review parking standards to allow different levels of off-street and on-street parking provision depending on an area's accessibility to services by walking, cycling and public transport.	Carried forward to PO 2006	The SA concluded that this is an option, which in some circumstances could benefit accessibility at an environmental cost; its attraction to some residents could create a vicious circle of more dispersed development and consequently more car-dependence. However this option is developed, it may be seen to be a blunt policy instrument as long as there is no Article 4 direction removing permitted development rights for the creation of hard standing and other parking areas within the cartilage.
	Support initiatives to increase the capacity and quality of road and rail infrastructure in the borough.	Carried forward, alternative rejected	Scores positively against both environmental and social objectives. Assumptions about the ability of current rail services to cope with additional development should not be lightly made. Development focussed on public transport hubs may only be viable with additional support.
	Improve provision for cyclists and pedestrians in the borough.	Carried forward, alternative rejected	Scores positively against a range of sustainability objectives, including those relating to social equity and the promotion of healthy lifestyles. No conflicts identified at this strategic level
Preferred Options 2006	he Council will work with relevant agencies to: Secure an extension to the 'Fastway' bus-based public transport system from Horley to Redhill and Reigate; Support and increase in capacity on the London to Brighton railway line; Expand the cycle network in the Borough; Secure significant improvements to the arrangements for interchange between bus and rail particularly in the quality of facilities, integration and frequency of services, upgrading infrastructure where necessary; and Link	Carried forward in part to submission 2009, fastway omitted due to project delivery completion.	SA concluded that the risk of climate change impacting on transport infrastructure is high

	public transport improvements to town and village centre parking strategies.		
	Include policies that ensure development proposals: Are capable of being served by safe and convenient access to the highway network and public transport; Do not give rise to traffic volumes that exceed the capacity of the local or strategic highway network; Do not cause harm to the character of the surrounding area as a result of the amount or type of traffic or additional parking generated; Be accompanied by a transport assessment, or transport statement depending on upon the size of the scheme and its potential impact; Be accompanied by a travel plan, where schemes could have significant implications for movement, in areas where air quality is poor or where traffic congestion is a recognised problem; and Provide high quality pedestrian / cycle infrastructure.	Carried forward in part to submission 2009 CS16	The preferred approach is in line with government and regional guidance and with sustainability appraisal recommendations.
Preferred Options 2008	Preferred Policy Approach 18: Travel Options - The Preferred option is to improve travel options by enhancing provision for bus, rail, walking, cycling and bridleways. Promote walking and cycling as the preferred travel option for shorter journeys. Enhance interchange facilities in Redhill and Horley Town Centres. More specifically, the Council will work with Surrey County Council, Network Rail and other relevant agencies, and require development proposals to achieve the above, including through the use of contributions, Travel Plans and high quality design	Carried forward to policy CS176 (Submission 2009)	The appraisal has identified the importance of maximising the use of rail and bus, and has indicated the need for this Preferred Option to help balance accessibility and congestion. This option supports a high density strategy. Increased cycling and walking is also considered to encourage healthier lifestyle, but would need to be supplemented by policy/criteria with respect to safety.
	Preferred Policy Approach 19 Accessibility - The Preferred Option is to direct development to accessible locations to reduce the need to travel, seek improvements in highway network to meet all street users' needs, to maximise efficiency of the movement network, seek to promote non-car travel and enhance accessibility along key corridors and at hubs, in particular promote Redhill/Reigate as a Transport Hub. More specifically, the Council will	Carried forward to policy CS17 (Submission 2009)	Accessibility is also an important element to avoid negative impacts associated with the revision of parking standards