



# Core Strategy

## Sustainability Appraisal Report

May 2012

## TABLE OF CONTENTS

1	SUMMARY AND OUTCOMES .....	3
2	BACKGROUND .....	10
3	APPRAISAL METHODOLOGY.....	16
4	CONTEXT AND SCOPE OF SA.....	19
5	SUSTAINABILITY OBJECTIVES .....	25
6	FINDINGS OF SA & IMPLEMENTATION .....	27

### APPENDICES

APPENDIX A: Checklist of how the requirements of the SEA Directive have been met .....	47
APPENDIX B: List of relevant policies, plans and programmes influencing the LDF... ..	49
APPENDIX C: SA objectives and decision aiding questions .....	53
APPENDIX D: Sustainability Appraisal Baseline Report October 2005.....	56
APPENDIX E: Appraisal matrices for February 2012 revision .....	57
APPENDIX F: Appraisal matrices / results from previous stages.....	63
APPENDIX G: Table showing alternative options for each policy, and which stage they were appraised at.....	64
APPENDIX H: Table showing recommendations and how they were addressed. ....	88

# 1 SUMMARY AND OUTCOMES

## 1.1 Non Technical Summary

### Role of Sustainability Appraisal

- 1.1.1 Sustainability Appraisal is a process designed to ensure that social, environmental and economic impacts are considered when formulating planning policies and proposals. This has involved comparing the Core Strategy Development Plan Document (DPD) against a set of 23 Sustainability Appraisal Objectives (SA Objectives) at various stages of its production. The objectives include protection of important habitats, protection of heritage interests, provision of affordable housing and the maintenance of a robust and flexible economy.
- 1.1.2 The set of SA Objectives provides the basis for an appraisal framework known as the Sustainability Appraisal Framework, further details of which are set out in Section 5 and Appendix C of this Core Strategy DPD Sustainability Appraisal Report (SAR).

### Sustainability Appraisal Methodology

- 1.1.3 Appraisal has been conducted by a group of Planning Officers from Reigate and Banstead Borough Council and neighbouring Planning Authorities. The group convened a series of meetings where potential impacts of different options were predicted by comparing the policies and proposals of the Core Strategy against the Sustainability Appraisal Framework.
- 1.1.4 In making predictions about the likely impacts of the Core Strategy, the appraisal team has referred to the 'baseline' of current social, environmental and economic conditions. This baseline is available at [http://www.reigatebanstead.gov.uk/public/Business\\_Planning/Planning/Policies/local\\_dev\\_framework/sustainability.asp](http://www.reigatebanstead.gov.uk/public/Business_Planning/Planning/Policies/local_dev_framework/sustainability.asp) and is reproduced as Appendix D of this SAR. For the appraisal of post submission changes data from the draft Quality of Life Profile document was used to supplement the Scoping Report.
- 1.1.5 Appraisal has been carried out for each stage of the preparation of the Core Strategy. The first appraisal was of the Issues and Options in October 2005 followed by an appraisal of the Preferred Options in May 2006. A second consultation SA report on Preferred Options was carried out in May 2008; a submission report was produced in November 2008 which was further revised in July 2009 as a result of modifications made to the Inspector during Examination.

1.1.6 Following the withdrawal of the Core Strategy, Appraisal was carried out on the Schedule of Changes A&B in July 2010. A further appraisal was carried out on the Core Strategy Outstanding Issues consultation draft in September 2011. The table below shows the stages of the SA process and reports published.

<b>Sustainability Appraisal Reports produced for the Core Strategy</b>	
<b>Stage of document preparation</b>	<b>Date SA report published</b>
Issues and Options	November 2005
Preferred Options	May 2006
Preferred Options Revisited	May 2008
Submission	January 2009
Suggested Modifications to the Inspector	July 2009
Schedule A & B Changes	July 2010
Outstanding Issues	September 2011
Submission 2012	May 2012

1.1.7 This SA Report reports on the findings of these appraisals, in addition to the findings from an appraisal carried out in February 2012 on recent amendments to the Core Strategy.

1.1.8 The first three appraisals were carried out by a panel of Planning Officers drawn from five Boroughs and Districts in East Surrey. An Independent Consultant has been involved at all stages and conducted the final appraisal of the previous Submission Core Strategy DPD. The appraisals on the Schedule of changes and Outstanding Issues consultation documents were carried out in-house, with verification provided by an Independent Consultant. The final draft version of Core Strategy has been appraised by process of peer review, again verified by an Independent Consultant. This method has ensured that appraisal has been carried out with a broad spatial perspective and with objectivity.

1.1.9 The outcome of these appraisals has informed the preparation of the Core Strategy with the aim of seeking to maximise the benefits to sustainability and avoiding or minimising any adverse impacts. Full details of appraisal at each stage are provided as a separate pdf document that is available on request. The appraisal matrices for each iteration of the Core Strategy can be seen in appendix F

## 1.2 Findings of the Sustainability Appraisal

### Development Strategy

- 1.2.1 The strategy indicates that Greenfield sites (which could include Green Belt) may be needed to provide for future housing delivery (post 2022) in one or more sustainable urban extensions. This scenario has been appraised at a strategic level and not having reference to any particular part of the Borough. Appraisal of a number of potential sites will need to be undertaken, to inform the selection process for any sustainable urban extension. A Sustainability Appraisal would need to be carried out on any amendments to the Green Belt boundaries which would take place through the appraisal of the Development Management Policies DPD. It is through the site allocations process that a number of potential sites will be identified and consulted on, and each of these options will be appraised through the SA framework established and used across East Surrey. An SA report will be produced to inform consultation on the alternative potential sites. The East Surrey SA framework is further explained in section 3.
- 1.2.2 Policy CS4 is worded to allow for an urban extension at a time only when regeneration opportunities have been delivered, and if other development opportunities in the existing urban area have been exhausted - this would be necessary to ensure that urban regeneration is the priority for development; all the while it is feasible. The most accessible locations are going to 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.
- 1.2.3 The long term strategy of an urban extension 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. A large scale development would also increase the potential viability for a Combined Heat and Power (CHP) scheme. The GI Strategy would need to be in place to inform design for biodiversity and habitat corridors that would need protecting or enhancing through design measures. Design measures and careful siting of development are important in minimising the disturbance to the landscape. The development would need to take into account nearby watercourses that could be negatively impacted on by the development. This strategy scores positively in social terms from the benefits of providing sufficient housing, and also in terms of the support to the economy by way of consumers and a flexible labour market.

- 1.2.4 The strategy for housing is to concentrate and prioritise development in Redhill, Reigate, Horley and Banstead through mixed use development on existing urban land and as a last resort consider Greenfield release for sustainable urban extensions. Whilst this avoids the areas of greatest risk of flooding, it is recognised that this issue will need to be addressed in the detail of the subsequent planning documents, including development briefs. A detailed area-specific SFRA has been carried out to inform the Redhill Town Centre AAP. Policy CS1 and Policy CS8, of the Core Strategy together with the detailed guidance for the development of areas (Policy CS6) set out the context for ensuring that flood risk is addressed appropriately. A revised SFRA for the borough was completed in February 2012.
- 1.2.5 A key benefit of the development strategy is that a more sustainable approach can be delivered with respect to access to services and facilities. The Core Strategy seeks to ensure that the majority of residents are able to access key services by walking or cycling and where this is not possible, that public transport provides a realistic alternative to the car. Given that housing provision could increase the number of journeys concentrated in the urban area, these measures will be essential to avoid increased congestion.
- 1.2.6 The strategy of mixed use regeneration provides an opportunity to improve the sustainability credentials of buildings and to increase the capacity of renewable energy. In addition, the Core Strategy establishes the basis whereby a network of green infrastructure can be integrated into the urban fabric to provide open space, improved management of the water environment, enhanced biodiversity and a better urban environment in which to live and work. In combination with measures to improve provision for walking and cycling the strategy also supports the objective of improving the health of residents. The opportunity for improvements in Redhill in particular is substantial and the Redhill Area Action Plan has provided a detailed strategy for the town.
- 1.2.7 The Core Strategy includes policies and criteria (CS2) that facilitate the protection and enhancement of cultural and heritage interest and this will be particularly important in Reigate, Banstead and other urban areas where small scale development proposals come forward.
- 1.2.8 A key element of the Core Strategy DPD is to reuse employment land in a more efficient and sustainable manner (smart growth) and reduce the need to travel by car. It is anticipated that in seeking to concentrate development in the most accessible areas the Core Strategy can improve the mobility of labour to support an efficient commercial

sector without increasing congestion. The quantity of affordable housing is lower than the previous South East Plan target which will mean a widening of the gap between need and delivery. There is opportunity to increase the provision of affordable housing within the possible urban extension. Whilst the ability to directly affect the match of skilled labour to employment opportunities is limited, the Core Strategy stresses the importance of the Council working with the community to support the improvement of vocational skills facilities.

1.2.9 It is recognised that Air Quality is currently a problem in parts of the Borough and the transport and accessibility elements of the Core Strategy seek to reduce the use of the car as a priority to address this. Whilst improvements in engine technology are also expected to substantially reduce the level of emissions of substances harmful to human health and biodiversity, it remains a key objective to reduce the emissions further on a local and global scale to address the contribution to climate change. In addition, it is anticipated that the combination of car and aviation emissions associated with Gatwick Airport mean that air quality to the south of Horley may remain poor. The Borough Council will need to continue to work with the relevant Authorities and organisations around Gatwick to improve the situation.

1.2.10 Addressing the causes and consequences of climate change is a fundamental principle of the Core Strategy. Whilst the locational strategy seeks to limit flood risk and to reduce the need to travel, it will be in the layout and design of individual developments and properties that the issue can be tackled fully. The Core Strategy sets the basis for doing so by requiring the application of standards such as the Code for Sustainable Homes and BREEAM<sup>1</sup>. Similarly, it will be in the detailed design stage where safe communities can be secured. It may be necessary to issue further advice and guidance with respect to incorporating climate change measures in areas where there are restrictive policies, notably the AONB, Listed Buildings and Conservation Areas. The proposed Sustainability Self-Assessment Guidance (see Policy CS8) may provide an appropriate opportunity for this.

1.2.11 The timely provision of infrastructure is fundamental to sustainable communities and the Core Strategy is supplemented in this respect by the Infrastructure Delivery Plan which guides phasing of infrastructure. Whilst the sustainability agenda requires a strong policy on the provision of infrastructure, community benefits and sustainable construction, it may be appropriate in subsequent planning documents

---

<sup>1</sup> Building Research Establishment Environmental Assessment Method – the commercial buildings standard

to clarify the circumstances and approach where abnormally high costs arise for development. This could include costs associated with situations such as the need to remediate contaminated land. It is noted that affordable housing policy has a sliding scale whereby smaller developments are required to make a smaller contribution and this is considered to partially address this matter.

## **Policies**

1.2.12 The Core Strategy strongly supports the objectives of sustainability by setting out a strategy to focus new development in the most accessible locations and without adverse impacts on the Surrey Hills Area of Outstanding Beauty or important wildlife habitats, notably the Mole Gap to Reigate Escarpment Special Area of Conservation and the Ashdown Forest Special Area of Conservation and Special Protection Area.

1.2.13 Policy CS15 (travel and accessibility) has an important role with respect to avoiding adverse impacts from air pollution on the Mole Gap to Reigate Escarpment SAC and the Ashdown Forest SAC/SPA and setting the context whereby the Development Management Policies DPD, Redhill Town Centre Area Action Plan, Design and Parking SPD and Green Infrastructure Strategy can address the detailed issues associated with accessibility to the natural environment and avoidance of recreational impacts on the SAC. The objective would be to support health and social inclusion but avoid adverse impacts on the most sensitive habitats. It is anticipated that mitigation plans will also be brought forward for these most sensitive habitats and that these will further consolidate this objective of the Core Strategy.

## **1.3 Monitoring**

1.3.1 Sustainability Appraisal indicates that the proposed Core Strategy has sound sustainability credentials, but there are some areas where adverse impacts might occur and it is recommended that these be monitored. In addition, monitoring can help identify areas where benefits are not being maximised. Progress with respect to the implementation of the Core Strategy DPD will be monitored through the Annual Monitoring Report for the LDF.

1.3.2 The following list identifies issues that can be monitored through the Annual Monitoring Report to ensure that the Borough Council is aware of the impact of the Local Development Framework on economic, social and environmental interests.

- Delivery of affordable housing

- Implementation of the SAC Mitigation Plan
- Provision of sufficient urban open land
- Meeting the appropriate level of Code for Sustainable Homes
- Meeting the appropriate level of BREEAM
- Delivery of regeneration priorities and development of previously developed land
- Air Quality Management Areas
- Increasing capacity of renewable energy
- Improving provision for walking
- Improving provision for cycling
- Improving provision for public transport
- Protecting cultural and heritage interests
- Protecting the landscape

## **2 BACKGROUND**

### **2.1 Purpose of Sustainability Appraisal**

- 2.1.1 In 2001 the EU adopted Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive'). The aim of the SEA Directive is "to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes, with a view to promoting sustainable development".
- 2.1.2 The Directive was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004 (the 'SEA Regulations'), which came into force on 21st July 2004. SA extends the concept of SEA to encompass economic and social concerns in addition to environmental.
- 2.1.3 Under the Planning and Compulsory Purchase Act 2004, Sustainability Appraisal (SA) is mandatory for a range of planning policy documents including Development Plan Documents (DPD).

### **2.2 Core Strategy outline**

- 2.2.1 The Core Strategy Development Plan Document (DPD) has been produced to deal with strategic planning issues that face the borough. The document is not be concerned with individual development sites or detailed specialist policy areas; instead it aims to set the overarching framework for the future. The Core Strategy aims to 'join up' land use issues with community issues including health and housing. The Core Strategy will provide the strategic direction for all subsequent planning documents.
- 2.2.2 The Core Strategy contains four main elements:
- An overall spatial vision setting out how the borough is expected to change over the plan period.
  - A set of spatial objectives outlining the main policy directions that needs to be pursued in order to realise the spatial vision.
  - A series of strategic policies for addressing the vision and objectives; these are locally distinctive providing a framework for informing and co-ordinating investment and for making decisions about development proposals.
  - An implementation and monitoring section including indicators and targets to provide a basis for monitoring the framework's implementation.

- 2.2.3 The strategic policies are divided into three main sections:
- Spatial Strategy Policies – which set the spatial strategy and context for growth, and describe how this growth will be planned, managed and delivered across the borough over the next 15 years
  - Place-Shaping Policies - which are specific to the different parts of the Borough. These policies will shape the future development within each area or place, taking account of local characteristics, opportunities and constraints. Throughout the plan period priority will be given to regeneration areas and the Horley new neighbourhoods, then to development in town centres and edge of centre locations.
  - Cross-Cutting Policies – which are more detailed policies that apply across the Borough and focus on specific types of development. These policies set out to local communities and the development industry the Council’s expectations and aspirations for future development.

### **2.3 Influences on the Core Strategy**

- 2.3.1 The Council formulated the Core Strategy taking into account:
- National policy guidance.
  - The results of community and stakeholder consultation on preceding drafts of the Core Strategy.
  - A range of technical evidence and the findings of Sustainability Appraisal up to and including the peer review appraisal carried out on 1<sup>st</sup> February 2012.

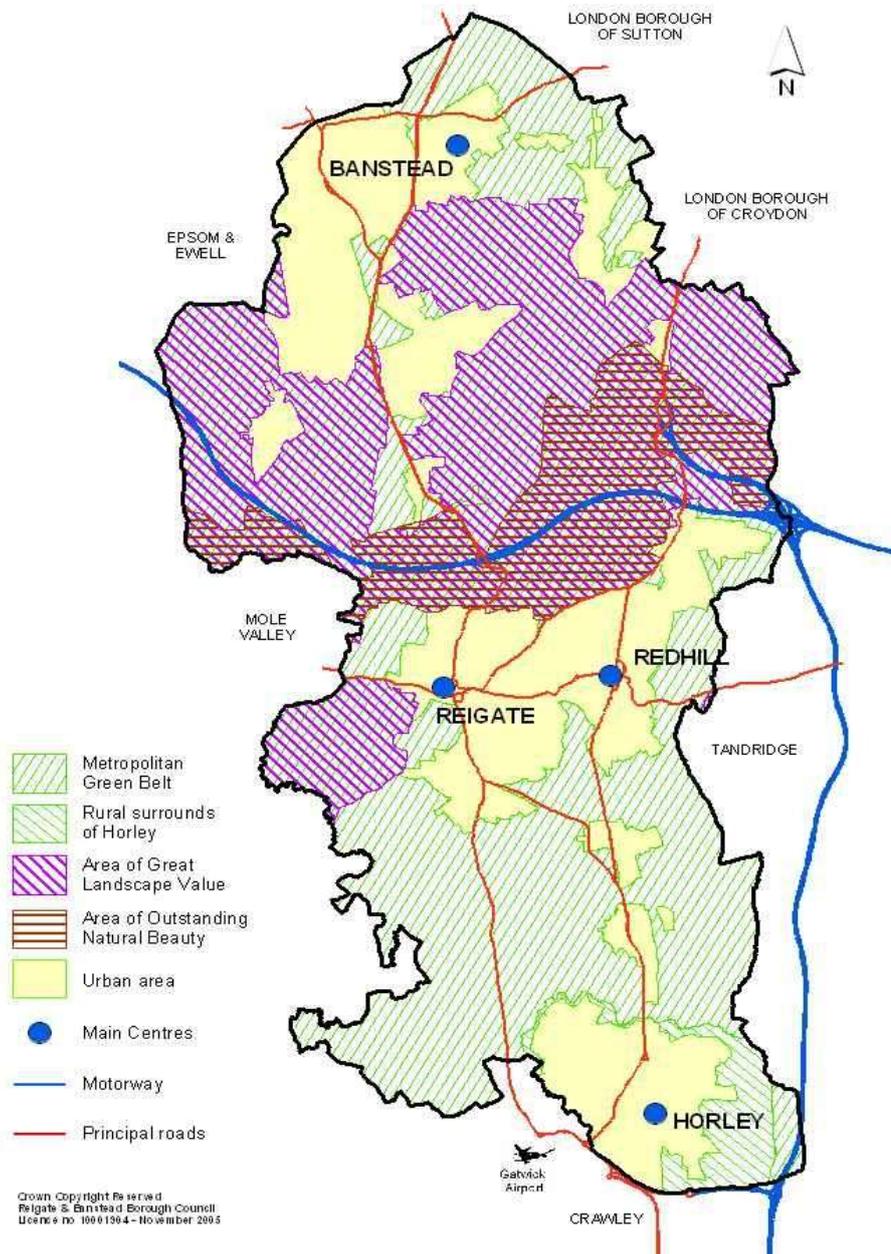
### **2.4 Policy context – National Planning Policy Framework (NPPF)**

- 2.4.1 The NPPF was published in March 2012 and policies within the framework came into force and became material considerations for plan making and decision taking from that point.
- 2.4.2 **Economy** - Securing economic prosperity remains a key commitment and the final NPPF retains the direction that ‘significant weight should be placed on the need to support economic growth through the planning system’.
- 2.4.3 **Town centres** - Are recognised as the heart of communities and policies and decisions should promote competitiveness, consumer choice and diversity which reflects their individuality.
- 2.4.4 **Rural economy** - Support for the rural economy particularly through diversification of rural businesses and the retention of local services and facilities should be included within local and neighbourhood plans

- 2.4.5 Housing** - Boosting housing development is a clear aim of the Framework. To do this, local plans should meet the full, objectively assessed needs for market and affordable housing and must continue to demonstrate a five year housing land supply, plus an additional buffer of 5%. Authorities are encouraged to consider setting policies to resist the development of back gardens where it would cause harm to the local area and are directed to 'set out their own approach to housing density to reflect local circumstances.
- 2.4.6 Design** - The importance of good design is clearly recognised with plans and decisions ensuring that development responds to local identity and sense of place whilst optimising the potential of the site to accommodate development
- 2.4.7 Healthy Communities** - Communities should be supported by the necessary cultural, community and social facilities and policies should guard against the loss of valuable facilities (such as shops, meeting places, pubs). In particular, existing open spaces, sport and recreation should not be built on except in exceptional circumstances
- 2.4.8 Green Belt & Natural Environment** - The strength of protection for the Green Belt is fully retained and there is recognition of the intrinsic value of the natural environment and biodiversity (whether designated or not) in order to reverse the 'net loss of biodiversity'.
- 2.4.9 Heritage** - The value of heritage assets, both designated and non-designated is strengthened.

## 2.5 Area covered by the DPD:

2.5.1 The map below for the borough of Reigate and Banstead illustrates the area covered by the Core Strategy DPD.



## **2.6 Plan objectives**

- 2.6.1 The DPD identifies 21 strategic objectives and includes policies that seek to ensure these objectives can be met. Underpinning the Core Strategy is a commitment by the Council to ensure that future development is achieved in a sustainable way - the overarching objective is to ensure that future development addresses the economic and social needs of the Borough without compromising environmental resources. This requires the identification of sustainable locations for housing and employment development that have the necessary infrastructure, services and community provision.
- 2.6.2 In providing for new development, the DPD seeks to maintain and enhance the existing character of the Borough and its cultural assets. Where possible the DPD will support healthy lifestyles through measures such as reducing the need to travel by car, ensuring open space is accessible to all, and setting out criteria for the development of safe, socially inclusive communities with a network of green infrastructure.
- 2.6.3 Compatibility testing of the draft DPD Objectives was undertaken in May 2006. Whilst the objectives were generally considered to be compatible with the aims of sustainability and to be mutually reinforcing, some potential conflicts were also identified. The findings of this early appraisal informed subsequent appraisal of the Preferred Options DPD (May 2008) and the detailed consideration is available as a separate document; the SA/SEA Preferred Options Report.
- 2.6.4 It is noted that the DPD Objectives have undergone minor modification since initial testing. It is considered however, that appraisal of the Submission DPD policies provides appropriate scrutiny of the likely impacts of the plan without the need to appraise the amended DPD Objectives.

## **2.7 Previous consultation**

- 2.7.1 A number of formal public consultations have taken place prior to the Submission Core Strategy DPD being produced: Issues and Options, from November 2005 to February 2006; Preferred Options, from May 2006 to June 2006 and a second Preferred Options stage which took place from July to August 2008. Pre-submission consultation took place in November 2009 – January 2010. Informal stages have taken place since the withdrawal of the Core Strategy, Schedule A&B changes (July 2010) and Outstanding Issues (September 2011) A consultation statement outlining each stage of consultation and who was consulted with has been produced and is available alongside the Core Strategy

document. The table below shows the stages of consultation that the Core Strategy document has been through.

<b>Sustainability Appraisal Reports produced for the Core Strategy</b>	
<b>Stage of document preparation</b>	<b>Date SA report published</b>
Issues and Options	November 2005
Preferred Options	May 2006
Preferred Options Revisited	May 2008
Submission	January 2009
Suggested Modifications to the Inspector	July 2009
Schedule A & B Changes	July 2010
Outstanding Issues	September 2011
Submission 2012	May 2012

## **2.8 Compliance with Strategic Environmental Assessment (SEA) Directive**

- 2.8.1 This SA takes account of the full range of planning guidance and complies with the requirements of Section 19 of the Planning and Compulsory Purchase Act 2004; European Directive 2001/42/EC<sup>2</sup>; and the Environmental Assessment of Plans and Programmes Regulations 2004.
- 2.8.2 Planning Policy Statement 12<sup>3</sup> confirms that where the process is compatible with the Government Guidance on Sustainability Appraisal<sup>4</sup>, it also meets the requirements of the SEA Directive<sup>5</sup>.
- 2.8.3 The table produced as Appendix A indicates where and how the requirements of the SEA Directive are integrated in this Sustainability Appraisal Report.

<sup>2</sup> The Assessment of the Affects of Certain Plans and Programmes on the Environment (2001/42/EC)

<sup>3</sup> Planning Policy Statement 12: Local Development Frameworks, ODPM 2004

<sup>4</sup> Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks, November 2004

<sup>5</sup> European Directive 2001/42/EC on the assessment of the effects of certain plans and programmes

### **3 APPRAISAL METHODOLOGY**

#### **3.1 Approach to Sustainability Appraisal**

- 3.1.1 The first formal stage of SA was the publication for consultation of a Scoping Report in June 2005. The three Consultation Bodies (Natural England, English Heritage and the Environment Agency), Surrey County Council and other specialist organisations were invited to comment.
- 3.1.2 Taking the responses of this consultation into account the Borough Council then worked with other Surrey Districts and Surrey County Council (SCC) to further develop the scope, a common methodology, and the SA Objectives. This process involved a series of workshops that were also attended by the Consultation Bodies. It is considered that this method of Local Planning Authorities and specialists jointly working through the process has provided a comprehensive and robust basis for SA.
- 3.1.3 The outcome of the meetings was a revised Scoping Report published in October 2005 (Appendix D) and it is this document that set the context and methodology for the appraisal. Further updating of the Scoping Report has been carried out for the Development Management Policies (DMP) DPD and Redhill Town Centre Area Action Plan (RAAP). The scope and baseline has been updated at the time of each appraisal through the incorporation of the most up-to-date LDF evidence base. For the appraisal of post submission changes baseline data from the draft Quality of Life Profile document was used to supplement the Scoping Report.
- 3.1.4 The SA of the previous submission Core Strategy DPD was carried out in November 2009 and drew on the conclusions and recommendations made at previous appraisals in October 2005, May 2006 and May 2008. After the withdrawal of the Core Strategy during examination, further stages of appraisal were carried out on the following versions of the CS: Schedule of Changes A & B (July 2010), Outstanding Issues (September 2011) and the most recent appraisal carried out on the final draft version (February 2012).
- 3.1.5 The outcome of the appraisal process was provided for the policy makers who were then able to consider the need to amend emerging policies such that the sustainability attributes of the Core Strategy could be maximised.
- 3.1.6 An independent consultant undertook an appraisal of the previous Submission Core Strategy DPD in November 2009.

- 3.1.7 Predicted impacts were recorded in a series of appraisal matrices. The findings of these earlier appraisals were incorporated into the previous submission Sustainability Appraisal Report (2009). The appraisal matrices from previous appraisals can be seen in appendix F.
- 3.1.8 The appraisals following the submission appraisal in November 2009 - on the Schedule A & B document and Outstanding Issues document - were carried out in-house. The final appraisal carried out in February 2012 has been carried out by peer review including an officer from an adjoining authority. This appraisal was then verified by an Independent Consultant.
- 3.1.9 When recording the predicted impact in appraisal matrices, a rating was allocated to indicate how the objective, proposal or policy being considered compares to each sustainability objective. Each option was assessed in terms of the nature of its effects (positive/negative/neutral/uncertain) and of its relative magnitude and duration over time. Each objective could be scored for short term, medium or long term impacts. Each policy was appraised separately but with reference to the strategy as a whole to ensure cumulative impacts were addressed.
- 3.1.10 The key to the impact rating is set out in the table below.

**Key to Impact Rating**

--	Substantial negative impact
-	Negative impact
0	Neutral
?	Uncertain or insufficient information on which to determine.
N/A	Objective not applicable
+	Positive effect
++	Substantial positive effect

- 3.1.11 The impact rating scale was applied through use of the decision aiding questions (appendix C) for each policy and across each objective, from this, an assessment was made by the appraisal panel as to the significance of the impacts, if applicable.

## **3.2 Difficulties encountered in producing the SA report**

### **3.2.1 Production of baseline data**

The scoping report was initially produced in 2005 and set the framework for the SA process. The SA objectives, decision aiding questions and scope were consulted on and the report was revised accordingly. Following a number of iterations of the Core Strategy the baseline data for the SA process has been updated through the use of the evidence base gathered for the Core Strategy, and produced as a summary in each SA report. For the final appraisal, the Borough Profile 2012 document was also used to refresh the baseline for the appraisal. This has meant that although the evidence base covers issues highlighted at the outset of the SA process, the scope of the appraisal may now have changed.

### **3.2.2 Appraisal**

The appraisal process did not involve the collection of any new data, and involved the informed judgements of a panel, overseen by an independent consultant. For this reason there were no perceived difficulties in this part of the process.

## **4 CONTEXT AND SCOPE OF SA**

### **4.1 Links to other strategies, plans and programmes and sustainability objectives**

4.1.1 A review of international, national, regional, county and local level legislation and guidance has been conducted to help identify objectives for sustainability appraisal. Appendix B provides a list of the relevant plans, programmes and strategies that have been considered.

4.1.2 The requirements of these documents provide the context for sustainability appraisal and have influenced the formation of the 23 objectives that comprise the SA Framework and have subsequently been fully integrated into appraisal. The full detail of the consideration of the requirements of other plans is detailed in the Scoping Report October 2005 (see Appendix D).

### **4.2 Description of the social, environmental and economic characteristics (sustainability baseline)**

4.2.1 In addition to other plans, the Scoping Report October 2005 (Appendix D) and the LDF evidence base have enabled a comprehensive description of the social, environmental and economic characteristics of the Borough to be developed.

4.2.2 The documents that comprise the LDF evidence base are available in full on request and can be seen on line at ([http://www.reigate-banstead.gov.uk/public/business\\_planning/planning/policies/local\\_dev\\_framework/ldf\\_evidence/](http://www.reigate-banstead.gov.uk/public/business_planning/planning/policies/local_dev_framework/ldf_evidence/))

- Affordable Housing Study 2007
- Affordable Housing Viability (update) 2009 and 2012
- Gypsy and Traveller Accommodation Assessment 2006
- Housing Context Technical Paper 2011
- Strategic Housing Land Availability Assessment 2011 and 2012
- East Surrey Strategic Housing Market Assessment 2008
- East Surrey Strategic Housing Market Update Report 2009 and RBBC update 2012
- Appropriate Assessment
- GVA Grimley Economic Market Assessment 2008
- Updating the Economic Evidence Base paper July 2011
- Business Survey 2010
- Design and Parking Review 2008
- Strategic Flood Risk Assessment Update 2012
- Infrastructure Delivery Plan 2012

- 4.2.3 The scope of the SA also takes into account Countywide evidence such as Local Transport Plan 3 (SCC, April 2011).

### **Overview of the Borough**

- 4.2.4 The Borough of Reigate & Banstead is fifty square miles in area and stretches from the edge of outer London through the Green Belt, to the West Sussex border in the south. There are a rich variety of landscapes and characteristics within the borough. The main London to Brighton road and rail links run north to south through the borough, with the M25 London orbital route running east to west.

### **Housing**

- 4.2.5 The Borough has experienced a modest growth in population and a continuing increase in the number of households, as they become smaller in size. Most of the existing housing stock in the borough is built at a generally low density and the emphasis of policy to concentrate in existing urban areas may result in a change in the character of those areas identified for redevelopment.
- 4.2.6 Opportunities for development outside urban areas are limited due to the restrictions of the Green Belt and Area of Outstanding Beauty designations. In addition, the Ashdown Heath and Mole Gap to Reigate Escarpment are habitats sensitive to air pollution and recreation.

### **Economy**

- 4.2.7 The borough is a relatively affluent area with low crime rates. However, it is recognised that some communities are under performing. The economies of Redhill and Horley town centres are successful but face competition from neighbouring shopping centres.
- 4.2.8 Whilst a third of the working population live and work in the Borough, more people commute out of the borough for work than commute into the borough. The percentage of well-qualified people is significantly higher than the national average and the percentage of people in the borough with no qualifications is significantly lower than nationally.

### **Environment**

- 4.2.9 Residents and visitors enjoy good access to attractive countryside. However, the combination of climate change, economic prosperity and population growth means that the Borough faces tough challenges relating to water supply, waste management and air quality.
- 4.2.10 The Mole Gap to Reigate Escarpment Special Area of Conservation is partially within the Borough and a number of other European or Ramsar wildlife sites are located in the wider area. The Surrey Hills

Area of Outstanding Natural Beauty places further limitations on development opportunities.

**Community**

4.2.11 Residents generally enjoy good health and higher than average life expectancy although general prosperity conceals local variations. Communities in some areas experience higher levels of crime, poorer literacy and numeracy, higher unemployment and poorer health. In some areas infrastructure and facilities are in need of replacement.

**4.3 Main social, environmental and economic issues and problems identified.**

4.3.1 The key sustainability issues for the Core Strategy were initially identified in the SA Scoping Report (October 2005) and this informed early appraisal work including the Issues and Options (November 2005), the Preferred Options Appraisal (May 2006) and the second Preferred Options Appraisal (May 2008) and subsequent appraisals of further Core Strategy revisions. The scope has been revised continuously on the basis of further appraisal work and the availability of further background evidence.

4.3.2 The key sustainability issues for the Borough have been set out below under the following headings:

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

**Summaries of the Key Sustainability Issues for Reigate & Banstead**

<b>Housing</b>	<p>Balanced migration projections for the borough indicate that there could be an additional 6,600 households in the borough (2011-2026)<sup>6</sup> - that is, as a result of the relatively high birth rate in the borough, people living longer and declining household sizes.</p> <p>A key principle in deciding locations for major development will be to reduce the need to travel, particularly by car and since higher density redevelopment is likely to be required, SA will need to</p>
----------------	---

<sup>6</sup> Cambridge Econometrics/Chelmer. These projections take the 2011 ONS Mid Year Estimates as a baseline.

	<p>consider the impact on congestion and avoiding adverse impact on local character, health and well being. Of primary concern for SA will be the ability to deliver sufficient affordable housing in accessible locations and the incorporation of multi functional green infrastructure.</p> <p>If Greenfield sites were required to meet need in the longer term, key additional considerations would be landscape impact, accessibility and flooding. The Borough Wide Character Assessment will inform SA in this respect.</p>
<b>Sustainable Communities</b>	<p>The priorities and issues raised in national policy and the Reigate and Banstead Community Plan set a clear scope for SA. The key issues are to support access to services and to leisure and recreation opportunities and improving the match between skills and local employment opportunities. Whilst infrastructure is important, no significant concerns have been identified and the scope of SA should be limited in this respect, for more detail please see the Infrastructure Delivery Plan (IDP).</p> <p>Safety and fuel poverty are important, but it is reasonable to assume that this can largely be delivered in new development through the implementation of the Code for Sustainable Homes and the design principles of national policy, By Design, the Surrey Design Guide and Secured by Design. The ability of the planning system to address fuel poverty in existing properties is dependent on the development of district heating and the SA will consider within the scope of the issue of Climate Change.</p>
<b>Accessibility</b>	<p>Redhill and Reigate form an urban area that is highly accessible by road and rail. A key issue for SA will be to consider how options can ensure all communities in the Borough have good access to services and how the LDF can deliver improvements to public transport, walking and cycling in areas with poor accessibility.</p> <p>Other centres in the Borough have good access to road and rail and a further issue for SA will be the relationship between high-density development, transport options and congestion. Access to open space and the impact of transport-derived emissions on air quality are considered within the subjects Health and Well Being and Biodiversity.</p>
<b>Health and Well Being</b>	<p>The role of the LDF in addressing health and well being is predominantly through supporting good access to health</p>

	services and leisure facilities, particularly open space, and reducing air pollution. Avoiding development in areas with high levels of noise is important, but the scope with respect to SA is limited since it can largely be resolved by design criteria.
<b>Economy</b>	A balance is sought between meeting employment and housing needs and this will require consideration of reducing the need to travel, particularly by car; improving the availability of locally based skilled workers to better match employment opportunities; and the application of more sustainable design in commercial buildings.
<b>Biodiversity</b>	The Borough has diverse habitats, the most important of which is the Mole Gap to Reigate Escarpment SAC. Appraisal has been informed by Appropriate Assessment (see paragraph 4.3.5 below). SA will also need to consider the likely impact of new housing on other habitats and maximising opportunities for enhancement through the application of sustainable design and green infrastructure.
<b>Climate Change</b>	The PPS1 Climate Change Supplement set a clear agenda for SA, which has been carried through into the NPPF, with respect to the causes and consequences of climate change. The key issues are minimising the need to travel, reducing the demand for energy, increasing the use of renewable energy, improving the management of water, and avoiding and reducing the exposure to flood risk. Related issues are green infrastructure, fuel poverty and congestion.

### **Special Area of Conservation**

- 4.3.3 Assessment of the Mole Gap to Reigate Escarpment SSSI several years ago found that part of the site was of European importance for chalk downland flora. The area was formally adopted and designated in 2005 by the UK government as a Special Area of Conservation (SAC). The Mole Gap to Reigate Escarpment SAC has eight main features ('qualifying habitats and species') for which it is designated as being important at a European level.
- 4.3.4 In October 2005, the European Court of Justice (EJC) ruled that in the UK land use plans, as well as projects, are required to be subject to an 'Appropriate Assessment'. The purpose of the Assessment is to assess the implications of a plan or project, either individually or in combination with other plans or projects, on a Natura 2000 site in view of the site's conservation objectives.

- 4.3.5 Appropriate Assessment has been undertaken by the Council, concluding that with the measures suggested put in place as part of the preparation and adoption of the Core Strategy, the Plan, in combination with others, will not have a significant impact on the Natura 2000 Sites as protected by the European Habitats Directive. Natural England has been consulted as part of this process.
- 4.3.6 The Habitat Regulations Assessment Report is available as a separate document and can be found here:  
[http://www.reigate-banstead.gov.uk/planning/planning\\_policies/local\\_development\\_framework/ldf\\_evidence\\_base/appropriate\\_assessment\\_in\\_ldf/index.asp](http://www.reigate-banstead.gov.uk/planning/planning_policies/local_development_framework/ldf_evidence_base/appropriate_assessment_in_ldf/index.asp)

## 5 SUSTAINABILITY OBJECTIVES

- 5.1 The key task in appraisal is the consideration of proposals against the SA Framework. Comments were invited on an initial SA Framework as part of the Scoping Report consultation in June 2005 and October 2005 and this was subsequently revised. 23 SA objectives were subsequently agreed at an East Surrey SA Working Group meeting in December 2005.
- 5.2 The SA Objectives are supplemented by decision aiding questions and it is the combination of SA Objectives and decision aiding questions that comprise the SA Framework. These questions have been developed through the SA scoping process and ensure that the key sustainability issues are addressed. The SA Objectives are set out below and the decision aiding questions that reflect the scope of the SA are provided along side the SA Objectives as Appendix C.

### **Social Progress that recognises the needs of everyone**

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 create and maintain safer and more secure communities.
5. To minimise the harm from flooding.
6. To improve accessibility to all services and facilities.

### **Effective protection of the environment**

7. To make best use of previously developed land and existing buildings.
8. To reduce land contamination and safeguard soil quality and quantity.
9. To ensure air quality continues to improve.
10. To reduce noise pollution.
11. To reduce light pollution.
12. To maintain and improve the water quality of the region's rivers and groundwater.
13. To conserve and enhance biodiversity within the plan area.
14. To protect and enhance the natural, archaeological, historic environments and cultural assets.
15. To reduce road congestion and the need to travel.
16. To reduce greenhouse gases.
17. To ensure the District is prepared for the impacts of climate change.

### **Maintenance of high and stable levels of economic growth**

18. Provide for employment opportunities.
19. Make land available to meet the needs of the economy.
20. Support economic growth that is inclusive, innovative and sustainable.

**Prudent use of natural resources**

21. To achieve sustainable production and use of resources.
22. To increase energy efficiency of new and existing development.
23. To increase the production and use of renewable energy.

## **6 FINDINGS OF SA & IMPLEMENTATION**

### **6.1 Findings of Appraisal**

- 6.1.1 This Sustainability Appraisal Report provides a detailed account of the consideration of the Core Strategy DPD against the SA Framework. The predicted impacts have been recorded in a series of appraisal matrices provided as detailed in Appendix E. The findings of appraisal at earlier stages have been incorporated into the matrices comprising Appendix F and the key findings are set out below alongside the predicted impacts of the 15 Core Strategy Policies.
- 6.1.2 For each of the Core Strategy policies a number of alternatives have been appraised throughout the process, appendix G shows a summary of each policy, the alternatives that have been appraised at each stage, and why each option was taken forward and why. At each stage of SA a number of recommendations were produced, a table in appendix H shows how these recommendations have been taken into account.
- 6.1.3 The following account is concerned with significant issues and as well as predicted impacts, discusses how the DPD has been informed by appraisal and how it addresses sustainability issues in general.
- 6.1.4 The initial submission Core Strategy DPD Sustainability Appraisal Report provided an account of the likely significant issues relating to the proposed distribution of development during the plan period. At that time appraisal was based on the proposed South East Plan housing target of 9240 houses in the Borough during the period 2006 to 2026. Different levels of growth have been tested throughout the preparation of the strategy including the higher figure put forward by the South East Plan of 10000 and 12500, in addition to annual housing delivery rates ranging between the SHLAA baseline figure of 300pa to SHMA figure of 980pa. The current figure in the Core Strategy is 460pa (6900 over the plan period).
- 6.1.5 The spatial objectives were first appraised at the preferred options stage (2006), this gave recommendations that fed into the next preferred options document (2008) as further detail for policy. Recommendations were put forward from the appraisal of the spatial objectives (2006) covering biodiversity, historic environment, sustainable construction, light pollution, local distinctiveness and new energy saving or renewable energy technology (see appendix H). The recommendations put forward were for the policy level or detailed design guidance rather than recommendations for changes to the spatial objectives. The vision was appraised through the spatial objectives, although there was little opportunity for the appraisal to

influence the vision, in that it replicated the Community Plan vision adopted in March 2008.

## 6.2 CS1 Valued landscapes and natural environment

Policy CS1 was informed by initial appraisal and has been appraised fully at submission stage (November 2008), then changes to the policy were appraised at the 'Schedule A&B' revisions stage (July 2010).

- 6.2.1 Policy CS1 makes provision for the protection and enhancement of the Borough's green fabric, including the North Downs AONB, the Metropolitan Green Belt, Areas of Great Landscape Value, habitats and wildlife corridors and urban open land. Policy CS1 together with Policy CS8 (Sustainable Development), and Policy CS9 (Sustainable Construction), provides a strong basis for protecting existing landscapes and townscapes and ensuring new development makes a positive contribution to the public realm and green infrastructure objectives.
- 6.2.2 Of particular importance in this respect, Policy CS1 will work alongside Policy CS10 (infrastructure) and CS15 (travel & accessibility) to help avoid adverse impacts on the Mole Gap to Reigate Escarpment SAC and the Ashdown Forest SAC/SPA which could result from emissions from traffic. Taking ongoing Appropriate Assessment<sup>7</sup> into account, this can be achieved through the implementation of a strategy that will seek to reduce access to the most sensitive areas of these habitats. The Development Management Policies DPD, Redhill Town Centre Area Action Plan, and Green Infrastructure Strategy will also play a role in linking appropriate accessibility to the natural environment with health and social inclusion.
- 6.2.3 The Green Infrastructure Strategy will seek the joint enhancement of biodiversity and the landscape and help to balance high density development and the delivery of urban open land. It could also help to maximise the benefits to biodiversity by identifying opportunities to link and improve wildlife habitats in line with the Surrey Biodiversity Action Plan<sup>8</sup>.

### How sustainability appraisal has influenced the development of this policy

At the Issues and options stage (2006), consideration was given to a set of options (C1b, 2b and 3b) where landscapes and the natural environment would not be strongly protected with policy not proactively seeking high quality design and

<sup>7</sup> consideration of the measures to avoid harm to Natura 2000 sites as required by the Habitats Directive

<sup>8</sup> <http://www.surreycc.gov.uk/environment-housing-and-planning/conservation-and-restoration/surrey-urban-biodiversity-project/surrey-biodiversity-action-plan>

green infrastructure. These options were all rejected on the basis of the importance of a high quality public realm, the need to protect important habitats and landscapes and that development patterns may become more dispersed in the absence of strong control on development.

Appraisal of spatial options for development at the preferred options stage (May 2008) indicated the importance of the quality of urban open space, public realm and green infrastructure to human health.

It is not considered likely that the lower figure of 460 pa (6900 over the plan period) would lead to significant adverse impacts since the spatial distribution would be the same as previously appraised, and this figure represents a significant drop from the higher figure of 12500 appraised at submission stage in 2009. It will be the role of character assessment and design to ensure that landscape interests are considered in a comprehensive and integrated manner.

This policy was changed post submission and fully appraised initially through the 'Proposed Changes Schedule A&B' in July 2010. An SA report was produced at this stage and consulted on. The main findings of this appraisal were that "The only two areas have that scored negatively compared to the submission appraisal is Major developed Sites in the Green Belt in relation to potential congestion (MDS have been subsequently removed by virtue of the draft NPPF), and the higher density development issues caused by the removal of 'sustainable urban extensions'" (urban extensions have been reinstated in the Core Strategy due a number of considerations including land supply issues and the results of the SA at this stage). The main conclusion at this stage was that "There are no negative scores that cannot be mitigated by design, green infrastructure, criteria based polices in the DMP/RAAP and the application of the sequential test". The appraisal matrices for Schedule A&B SA can be seen in appendix F. A further change to this policy is the removal of the 800m buffer from the SAC, this was removed due to evidence and implementation issues and was agreed with Natural England. This will be subject to testing through the Habitat Regulations Assessment (Separate Document).

### 6.3 CS2 Valued Townscapes

Policy CS2 was informed by initial appraisal and has been appraised fully at submission stage (November 2008).

- 6.3.1 Protecting and enhancing heritage and cultural assets is an integral part of sustainable communities and sustainable economic growth. Policy CS2 establishes the context for the Development Management Policies DPD, Redhill Town Centre Area Action Plan and Design Guidance to address the specific details of the reuse and adaptation of heritage buildings. These documents can seek to ensure that high density development and the need to integrate lighting/illumination, biodiversity, SUDS, energy efficiency and renewable energy can be achieved without compromising the quality of the urban environment and heritage interests. The Borough Wide Character Assessment will inform these documents.

How sustainability appraisal has influenced the development of this policy

The comments for Policy CS1, above, are relevant. In addition, appraisal has identified the importance of the quality of the public realm not only in terms of well being, but in recognition of the role of heritage in regeneration.

Appraisal of Option D3a (Issues and Options 2005), identified potential conflict between increasing renewable energy capacity and landscape and heritage designations. This is addressed to an extent in Policy CS2, but the issue can be more substantially addressed in other policy documents, notably the Green Infrastructure Strategy.

It is not considered likely that the current plan figure of 460 pa (6900 over the plan period) would lead to significant adverse impacts. It will be the role of character assessment and design to ensure that heritage interests are addressed and that high quality design is delivered.

This policy has been changed post submission to include point e “be designed sensitively to reflect local heritage and to protect and enhance the historic environment”. This addressed the recommendations of the SA report that the “agenda is set by policy CS2” with regards to heritage buildings.

#### **6.4 CS3 Valued People**

Policy CS3 was informed by initial appraisal and has been appraised fully at submission stage (November 2008), then part 1c, d, e & f were appraised at the ‘Outstanding Issues’ stage (September 2011).

- 6.4.1 A key element of the Core Strategy DPD is to reuse employment land in a more efficient and sustainable manner (smart growth). Policy CS3 sets out the basis for achieving this through regeneration and improved infrastructure. Policy seeks to ensure that high density mixed development is delivered without compromising the need to retain or the ability to enhance urban open land and biodiversity.
- 6.4.2 The Development Management Policies DPD, Redhill Town Centre AAP and development proposals will need to address these issues and will be guided by Policy CS8, Policy CS9 and Policy CS10. The Green Infrastructure Strategy has a key role and of particular importance will be that measures to maximise solar gain, shading, water efficiency, privacy and biodiversity are fully integrated and effective in the long term.
- 6.4.3 The policy supports regeneration, providing an opportunity to improve the sustainability performance of commercial buildings and accessibility to services. Policies CS8, 9 and 10 set the context for achieving this objective and the DMP and AAP can identify specific

opportunities to do so. Similarly, specific issues relating to noise, light, the water environment and biodiversity can be addressed in the DMP, AAP and Design & Parking SPD.

- 6.4.4 Policy CS3, in combination with Policy CS4, Policy CS5 and Policy CS6, seeks to ensure that access to employment, services and facilities can be improved, particularly where access is currently poor.
- 6.4.5 Intensification of existing employment sites/ town centres / regeneration areas may make CHP more viable. Supporting entrepreneurship and innovation by facilitating the provision of affordable start-up/incubator units in the most accessible locations strongly supports economic growth and social objectives of reducing poverty and social exclusion. The appraisal considered that the use of LDOs would be positive in terms of economic growth and will give opportunities for incorporating flood risk mitigation, energy efficient design, production of renewable energy, sustainable use of resources, and can be directed to accessible and previously developed areas.

How sustainability appraisal has influenced the development of this policy

At the Preferred Options stage (May 2006), consideration of the locational strategy (Option 1), housing delivery (Option 5) and housing mix (Option 7) identified the importance in achieving a balance between housing and employment. With reference to the Employment Land Review, this balance would support the objective of good accessibility without compromising quality of life. The appraisal identified a set of criteria that could be included in the Core Strategy to support this. Policy CS3 addresses some of the issues, whilst other issues are dealt with in separate policies and/or will be addressed in subsequent Development Plan Documents, Area Action Plans and the Green Infrastructure Strategy. The proposed criteria are listed below together with a reference to where the issue has been addressed:

- quality of urban open space/public realm required/green infrastructure (Policies CS1, CS2, CS8, CS9 and CS10)
- delivery of affordable housing (Policies CS12 and CS13)
- flood risk at Redhill and Horley (Policy CS8, RAAP SFRA)
- infrastructure matching development in the long term (Policies CS3, CS8, CS9 and CS10)
- maximising opportunities to improve access by public transport, cycling and walking (Policy CS15)
- provision of open space in accordance with Natural England's ANGST to avoid increased recreational pressure on the Reigate to Mole Valley Escarpment SAC (Policies CS1, CS2, CS4, CS8, CS10 and CS15)
- maximising the benefits from introducing the Code for Sustainable Homes (Policies CS8 and CS9)
- taking the opportunities offered by mixed use for renewable energy and CHP (Policies CS8, CS9)

The appraisal emphasises the importance of policy CS15 which seeks to deliver sustainable transport. Higher growth should remain compatible with reducing/avoiding an increase in congestion, but will rely on adequate provision

for alternatives to the car for those travelling into the main towns and that traffic and parking are managed effectively.

## 6.5 CS4 Strategic Locations for Growth

Policy CS4 was informed by initial appraisal and has been appraised fully at submission stage (November 2008) as then policy CS4 and CS5, as an amalgamated policy CS4 appraisal was carried out on the Schedule of changes to the Core Strategy A& B (July 2010). Broad Locations for growth were appraised through the Outstanding Issues consultation (2011)

- 6.5.1 Policy CS4 seeks to deliver a regeneration led approach to growth and, in combination with Policy CS6, Policy CS8, Policy CS9 and Policy CS10, sets the agenda to be taken forward in the Development Management Policies DPD and Redhill Town Centre AAP. It will also be supported by the Infrastructure Delivery Plan, Policy CS1 and Policy CS2 to ensure adequate infrastructure is delivered and that biodiversity, cultural and heritage assets and the water environment are protected from inappropriate development and, where possible, enhanced.
- 6.5.2 The Core Strategy strongly supports the objectives of sustainability by setting out a strategy to meet housing need in the most accessible locations and without adverse impacts on the Surrey Hills Area of Outstanding Beauty or important wildlife habitats, notably the Mole Gap to Reigate Escarpment Special Protection Area and the Ashdown Forest Special Area of Conservation.
- 6.5.3 The strategy for housing would be to concentrate development in Redhill, Reigate, Horley and Banstead in the short to medium term (up to 2021/22) through high density mixed use development on existing urban land. Throughout the plan period the strategy is to direct development first to built up areas<sup>9</sup>, town centres first then edge of town centre locations, accessible by walking. Beyond 2021/22 it is acknowledged that some Greenfield development may be required, but that this will only be considered in the most sustainable locations and after the regeneration priorities have been delivered and after any other development opportunities within the existing urban area have been exhausted. There is an importance placed on measures to reduce congestion, improve water efficiency and to deliver green infrastructure. Additional housing would support a key sustainability

---

<sup>9</sup> Reigate, Redhill. Horley and Banstead

objective of providing sufficient housing to meet needs and improve affordability.

- 6.5.4 Additional housing in the short to medium term is not likely to significantly alter the spatial distribution of development, but it could lead to higher densities in the four main settlements identified for the major allocation in the Core Strategy (Policy CS4). Whilst this consolidates the opportunity for regeneration and to invest in improvements in public transport, walking and cycling, sustainable transport policy (Policy CS15) will be instrumental in avoiding both congestion and the potential for an associated deterioration in air quality. With respect to the latter, this emphasises the importance of sustainable design and construction and sustainable transport as identified in Policy CS8.
- 6.5.5 Appraisal has been carried out at Outstanding Issues stage (September 2011) on the concept of development on Greenfield (potentially Green Belt), area yet to be determined. The balance between urban intensification and releasing Green Belt land (sustainable urban extensions) has been explored in a sustainability appraisal of broad locations for development; these matrices are in Appendix F. The appraisal of the Schedule A&B changes to the Core Strategy (which at that time had no reference to urban extensions) highlighted a number of issues associated high density living in the urban area particularly in relation to climate change and flooding. The SAR concluded that most of these issues could be mitigated through design and green infrastructure improvements, although there was still concern that “there may be pressure on the ability to provide open space”.
- 6.5.6 Policy CS1 (valued landscapes and natural environment), Policy CS2 (valued townscapes) Policy CS8 (sustainable development) Policy CS9 (Sustainable construction) Policy CS 10 (Infrastructure delivery) and Policy CS15 (Travel options and accessibility) provide the basis for appropriate safeguards and set a positive green infrastructure agenda for the DMP and RAAP. In addition, these strategies and design guidance can draw on the Borough Wide Character Assessment to ensure important assets are protected.
- 6.5.7 A key element of the Core Strategy DPD is to reuse employment land in a more efficient and sustainable manner (smart growth) and reduce the need to travel by car. The strategy is able to direct development to the most accessible areas but the delivery of affordable housing to enable those employed in the borough to live locally is set at a lower percentage than is required in order to meet need in the borough, to address this in some way the Core strategy aims to seek to maximize affordable housing on urban extension sites. The Core Strategy

transport policies complement this approach by seeking to improve the mobility of labour to support an efficient commercial sector without increasing congestion.

#### How sustainability appraisal has influenced the development of this policy

Policy CS4 reflects the findings of the Borough Wide Character Assessment in setting out a strategy that favours development in settlements with superior accessibility in the Wealden Greensands and Low Weald Area, and makes provision for lower levels of development in the North Downs area, which is identified as being more sensitive to change. The Borough Wide Character Assessment forms an integral part of appraisal. It demonstrates why development in the open countryside would not be favoured (see Appendix H) . Accordingly, Policy CS5 and Policy CS6; the Site Allocations DPD, Area Action Plans and Design Guidance SPD supplement Policy CS4 by setting the context with respect to the mix, layout, and density of development. In combination, these Policies and Plans strongly support accessibility, social inclusion and health.

Appraisal of Options in May 2006 found that the Preferred Option of planning for a New Growth Point has strong sustainability attributes, in particular the delivery of affordable housing in locations with good accessibility, the opportunity to enhance cultural assets, heritage and a sense of place in urban areas. It was noted that a degree of uncertainty exists, however, with respect to finding the right balance between use of land for employment and housing, addressing climate change, and the more minor issue of noise and light nuisance.

Early appraisal highlighted concern that whilst a regeneration led approach to growth would support access to health services, there could be difficulties in achieving the wider objective of well being. It is noted that in this respect Policy CS8, Policy CS9 and Policy CS10 seek to ensure that a strategy of high density development does not compromise the ability to deliver sufficient formal open space. Similarly, Policy CS15 seeks to ensure that high density development does not compromise the ability to address congestion and, consequently, the potential to exacerbate air quality, particularly in AQMAs, as well as the potential to increase greenhouse gas emissions.

Early appraisal identified that a strategy that focuses development in existing urban areas would be more likely to be compatible with flood risk objectives and the tests of PPS25. It is noted that Policies CS1 and CS8 identify protection of the floodplain as a key consideration. Nevertheless, addressing flooding issues will be a key consideration in the DMP, RAAP and Design & Parking SPD. Policy CS4 puts a significant emphasis on regeneration, providing an opportunity to improve the sustainability credentials of commercial buildings. Policies CS8, 9 and 10 set the context and this can be addressed fully in the detail of the DMP, RAAP and Design and Parking SPD. High density mixed use provides a major opportunity to improve the capacity of renewable energy and this can, similarly, be addressed fully in the detail of the DMP and RAAP.

Appraisal of growth in the borough emphasises the importance of sustainable design and construction and the Green Infrastructure Strategy. A limiting factor for development could be AQMAs in Merstham and/or Horley, where it is likely that ozone and NOx emissions may remain high despite improvements to engine technology in cars. This may reduce the potential for development at the urban fringe in the Low Weald. For Redhill, the emphasis on the importance of green

infrastructure becomes even greater with more development.

Following the SA peer review carried out on the draft Submission Core Strategy (February 2012) the Core Strategy was amended to include the additional reference in the supporting text to CS13 to clarify that we will seek to maximise affordable housing provision on urban extension sites. Appraisal has been carried out on the additional criteria set in policy CS4 for guiding the search for potential urban extensions. The full appraisal matrix can be seen in Appendix E. The outcome of this appraisal was that the “scale of development is key to realising a number of sustainability objectives, if large enough the development could carry facilities such as shops, school, community buildings, and health care buildings thereby reducing the need to travel. CHP and other renewable energy initiatives will also have greater viability for a larger development. A large development will also address the housing need and provide workers to enable economic stability/growth in the Borough”.

## 6.6 CS5 Town and Local Centres

Policy CS5 was informed by initial appraisal and had been appraised fully at submission stage (November 2008), then referred to as policy CS6

- 6.6.1 Policy CS5 supplements and consolidates Policy CS4 and CS6 in that it clarifies the importance of retaining and enhancing facilities and services where they are most accessible by a variety of modes of transport. A hierarchy of centres facilitates a settlement pattern that will support service provision in local centres in the long term combined with improved access for all to higher order settlements.
- 6.6.2 The spatial strategy and Core Strategy policies offer a sound basis to help remove barriers to access to services and housing. Design and layout can enhance identity and accessibility to services, including communities that are walkable with disabled friendly spaces and measures to ensure the long term maintenance of public spaces.
- 6.6.3 It is considered that development in Redhill, Reigate, Horley and Banstead will make a substantial contribution to providing sufficient housing to enable people to live in a home suitable to their needs and which they can afford. In addition this would deliver housing, employment and retail development in the most accessible parts of the Borough. Not only does this have positive benefits in terms of health and social inclusion, but this supports reducing the need to travel by car. Additional measures can be implemented through Policy CS15, which aims to improve provision for cycling, walking, public transport and car parking.

6.6.4 The DMP and RAAP can make further provision with respect to health, well being and social inclusion objectives. In addition, with respect to Redhill and Horley these documents will need to address flood risk; and for Horley and Reigate, air quality will be an important consideration. The protection of heritage and cultural assets will be important for all development proposals, but particularly in Reigate and in Banstead. The DMP and RAAP will be informed by the Borough Wide Character Assessment in this respect.

## 6.7 CS6 Areas 1, 2a, 2b and 3.

Policy CS6 was informed by initial appraisal and had been appraised fully at submission stage (November 2008), then reappraised as part of the Outstanding Issues consultation (September 2011)

6.7.1 Redevelopment is a fundamental element of Policy CS6, providing an opportunity to improve the performance of urban areas in terms of noise and light pollution, biodiversity, open space and the water environment. Policies CS8, 9 and 10 set the context and issues can be further addressed in a Design and Parking SPD. The Borough Wide Character Assessment provides the basis for the DMP and RAAP to identify and protect existing assets. It is noted that Policy CS6 recognises the limitations in Horley with respect to flooding, noise and air quality.

6.7.2 Appraisal matrices can be seen for the submission appraisal in Appendix E and for the Outstanding Issues in Appendix F.

### How sustainability appraisal has influenced the development of this policy

The importance of green infrastructure and measures to reduce congestion are greater as levels of development increase.

Area 1, North Downs

#### Banstead

Appraisal has previously identified that the potential impact with respect to flooding in Banstead was uncertain. Whilst it is likely that it will be possible to implement appropriate measures to avoid increased flood risk to existing areas and to ensure new development is not at risk, this will be a key issue for the DMP and any Area Action Plan or site specific proposal.

Policy CS1 and Policy CS2 seek to ensure the impact on the townscape and landscape is acceptable. Higher levels of growth could increase the need for high density and/or put pressure on heritage interests. Whilst it is considered likely that the additional development can be accommodated without any significant impact, proposals will be informed by the Borough Wide Character Assessment. This will be a key issue to assess for the DMP, any Area Action Plan or site specific proposal.

Area 2, Wealden Greensand Ridge

Redhill and Reigate

The flood risk issues and townscape/density issues identified for Banstead also apply to Redhill and Reigate.

Air quality concerns were identified in the submission Core Strategy DPD SAR with respect to Reigate High Street. Whilst it is considered likely that the levels of development set at 460 pa would not lead to impacts significantly greater than with the original SE Plan allocation, it will be a key issue to address in the DMP.

The appraisal of the CS has influenced the development of the Redhill Area Action Plan which it was suggested that the plan could be led by Green Infrastructure and include measures to:

- address flood risk and improve water efficiency
- increase renewable energy capacity
- improve energy efficiency
- increase the use of rail and bus
- improve facilities for pedestrians and cyclists and how they link to public transport
- provide sufficient open space
- address privacy, noise and light pollution

Area 3 – Low Weald

Horley

The Core Strategy DPD SAR identifies that air quality is predicted to continue to be poor in the areas in the south of Horley because of emissions related to Gatwick Airport. Whilst it is considered likely that the levels of development at 460 pa would not lead to impacts greater than with the original SE Plan allocation, it will be a key issue to address in the DMP.

The Infrastructure Capacity Study<sup>10</sup> indicates that measures to reduce stress on the sewerage system would provide greater certainty with respect to the ability to accommodate growth in the long term.

## 6.8 CS7 Gatwick Airport

Policy CS7 was informed by initial appraisal and had been appraised fully at submission stage (November 2008)

- 6.8.1 A more positive approach has emerged which seeks to support sustainable economic growth whereby significant employment opportunities could be achieved. The impact on labour supply for companies based elsewhere in the Borough is, however, of concern and it is noted that Part 2 of Policy CS3 seeks to support the improvement of vocational skills facilities.

---

<sup>10</sup> [http://www.reigate-banstead.gov.uk/planning/planning\\_policies/local\\_development\\_framework/ldf\\_evidence\\_base/infrastructureevidencebase/index.asp](http://www.reigate-banstead.gov.uk/planning/planning_policies/local_development_framework/ldf_evidence_base/infrastructureevidencebase/index.asp)

6.8.2 Whilst it is recognised that Gatwick Airport lies outside the administrative area of Reigate & 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. In the interests of sustainability it is recommended that the Council should seek to influence future development proposals at the airport so that it addresses social inclusion and safe communities; the risk to human health represented by the AQMA, the impact on the River Mole catchment from polluted run off and potentially increased flood risk, noise and light pollution, and the impact on highways. A potentially significant benefit is that substantial demand for energy may support opportunities for renewable energy capacity in the Borough.

How sustainability appraisal has influenced the development of this policy

Appraisal of Option E5 (Issues and Options 2005) considered two approaches with respect to Gatwick Airport: a, 'maintain opposition to a second runway' and b, 'not opposing a second runway'. Whilst Option E5a was considered to have greater sustainability attributes in terms of protecting the environment and allowing for balanced growth in the wider area, it was noted that without an additional runway the existing airport may continue to attract an increasing number of passengers annually, resulting in a continuation of environmental problems into the foreseeable future. In particular, traffic congestion and poor air quality in some parts of Horley.

## 6.9 CS8 Sustainable Development

Policy CS8 was informed by initial appraisal and had been appraised fully at submission stage (November 2008), point 3, 8 and 10 were appraised as minor amendments in February 2012.

- 6.9.1 Policy CS8 provides the balance to the requirement for high density development by seeking to ensure that the potential adverse impacts on traffic congestion, health, heritage, biodiversity and pollution as well as climate change are all addressed. Sustainability Self-Assessment Guidance will further support delivery. It is noted from the appraisal of Policy CS1 that further work may be necessary to ensure climate change measures can be delivered in areas where there are restrictive policies; an appropriate document for this may be the Design and Parking SPD, and can be informed by the Borough Wide Character Assessment.
- 6.9.2 Policy CS8 also supports the delivery of good quality homes and mixed use developments. Whilst it is predicted that the design and layout requirements are not likely to compromise the ability to deliver sufficient quantity of homes and commercial land the position should

be monitored. It may be appropriate to include a reference to clarify the parameters and priorities where abnormal costs of development may arise.

6.9.3 Of particular importance will be measures such as green roofs and sustainable urban drainage. Whilst this can help achieve multiple benefits, the ability to slow the rate of run off during flash flooding could, in some circumstances, be essential. In the Low Weald this, and improved water efficiency, will help to address concern with respect to the long term capacity of Horley Sewage Treatment works.

6.9.4 Higher levels of development would further enhance the viability of improved energy efficiency and renewable energy, in particular Combined Heat and Power and Community CHP, the most cost effective means of achieving higher levels of the Code for Sustainable Homes.

How sustainability appraisal has influenced the development of this policy

Earlier appraisal (Option 3b, May 2006) identified the importance of ensuring that the strategy establishes the means to deliver a comprehensive multi functional Green Infrastructure network. Appraisal of Options C1, C2, C3, D1, D2 and D3 (Issues and options 2005) identified positive impacts in relation to environmental capital and considered that a green infrastructure 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.

Appraisal of the spatial location of development (Policies CS4, CS5, CS6 and CS7) identified the importance of quality of urban open space, the public realm and green infrastructure to balance a policy of high density housing. Policy CS9 seeks support this objective by setting the context for adopting appropriate densities in different parts of the Borough through the DMP and RAAP. Policy CS8 also responds to the climate change agenda.

Consultation on the SA report produced a request for the inclusion of water quality which fed into the criteria for this policy. Points 3, 8 and 10 were added to the policy and appraised in February 2012 by process of peer review. From the appraisal the following changes were made:

- 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.

## 6.10 CS9 Sustainable Construction

Although Policy CS9 was informed by initial appraisal and had been appraised at submission stage, the policy wording has changed

significantly. A full appraisal of the policy was carried out by peer review in February 2012.

- 6.10.1 Policy CS9 supports the delivery of good quality homes that also seek to reduce the use of natural resources compared to the current standards and address the causes and consequences of climate change. Whilst it is predicted that the design and layout requirements are not likely to compromise the ability to deliver sufficient quantity of homes and employment land, the position should be monitored.
- 6.10.2 Appraisal recommends that it may be necessary to issue further advice and guidance with respect to incorporating climate change measures in areas where there are restrictive policies, notably the AONB, Listed Buildings and Conservation Areas. An appropriate document for this may be the Design and Parking SPD.
- 6.10.3 The peer review appraisal produced recommendations for the DMP “The DMP should give consideration as to whether there needs to be some additional direction as to whether you minimise or maximise particular facets of Code for Sustainable Homes<sup>11</sup>/ BREEAM<sup>12</sup> in relation to particular sites”.

How sustainability appraisal has influenced the development of this policy

Appraisal of Option 2 (PO May 2006), which proposed the inclusion of policies and criteria against which all proposals would be assessed, and previous appraisal (Issues and Options 2005) of Options D1a ‘environmentally responsible design and construction’, D2a, ‘on site renewable technology’ and D3a ‘renewable energy infrastructure’ identified the importance of a policy that would protect the environment, reduce the use of resources and alleviate fuel poverty and pressure on water supply.

Subsequently appraisal of the spatial location of development (Policy CS4) identified the importance of quality of urban open space, the public realm and green infrastructure with respect to balancing potential adverse affects of a policy of high density housing. Policy CS9 sets the context for requiring the incorporation of sustainable construction and design that would address these issues. Appraisal of Option 5 (PO May 2006) emphasises the particular importance of the role of improving flood risk infrastructure, with particular reference to Redhill and Horley. This issue is addressed by Policy CS8, CS9 and CS10 and will be considered further in subsequent DPDs and Area Action Plans. Appraisal of Option 10 (Community Facilities and Infrastructure) identified benefits with respect to the range, quality and accessibility of community and leisure facilities in the Borough and that the appropriate mix would be informed by a Retail and Leisure Study.

<sup>11</sup> <http://www.communities.gov.uk/planningandbuilding/sustainability/codesustainablehomes/>

<sup>12</sup> <http://www.breeam.org/>

## 6.11 CS10 Infrastructure

Policy CS10 was informed by initial appraisal and had been appraised fully at submission stage (November 2008)

- 6.11.1 Policy CS10 seeks to ensure that the necessary infrastructure is in place to support the delivery of good quality homes and sustainable economic development. Whilst it is recognised that it will be detailed design measures that ensure delivery, a strategy of encouraging mixed development and community facilities provides a strong basis for safe and inclusive communities.
- 6.11.2 Policy CS10 will work in combination with the locational strategy and Policy CS15 to improve accessibility by public transport, walking and cycling, helping to address concern that high density development could contribute to congestion. The Green Infrastructure Strategy could investigate ways of addressing air quality problems; noise and light pollution; maximising the use of SUDS and green roofs. Addressing the causes and consequences of climate change will be central to the Green Infrastructure Strategy.
- 6.11.3 It is predicted that the requirements for contributions are not likely to compromise the achievement of other objectives, although the position should be monitored. In addition, when further developing the approach to contributions and tariffs, consideration should be given to the impact of abnormal costs.
- 6.11.4 Of particular importance will be measures such as green roofs and sustainable urban drainage. Whilst this can help achieve multiple benefits, the ability to slow the rate of run off during flash flooding could, in some circumstances, be essential. In the Low Weald this, and improved water efficiency, will help to address concern with respect to the long term capacity of Horley Sewage Treatment works.
- 6.11.5 Higher levels of development would further enhance the viability of improved energy efficiency and renewable energy, in particular Combined Heat and Power and Community CHP, the most cost effective means of achieving higher levels of the Code for Sustainable Homes.

### How sustainability appraisal has influenced the development of this policy

The comments for Policy CS8 and Policy CS9, above, are relevant. The Surrey Infrastructure Capacity Study (ICS) indicated that there are no absolute restrictions on growth, but this may rely on an effective operation of the tariff system to deliver

infrastructure. The ICS identified the provision of school places as the greatest concern, although it anticipated that capacity could be increased at existing sites where necessary. These locations are well placed to serve the current spatial distribution of the population and would, therefore, be compatible with a regeneration strategy. The Infrastructure Delivery Plan provides an assessment of existing coverage and future infrastructure requirements across the plan period. This can be seen as part of the LDF evidence base.

## 6.12 CS11 Housing Delivery

Policy CS11 was informed by initial appraisal and had been appraised at submission, and post submission at levels ranging from 9600 to 12500 (over a 20 year period). A range of per annum figures were appraised as part of the Outstanding Issues stage of the CS, from 300 – 980 pa.

- 6.12.1 Policy CS11 clarifies the commitment to the delivery of the housing element of Policy CS4 and the appraisal comments are recorded under that heading, above.

### How sustainability appraisal has influenced the development of this policy

As stated for Policy CS10, above, the Infrastructure Capacity Study (ICS) indicated that there are no absolute restrictions on growth but this may rely on in addition, sustainable design and an effective operation of the CIL/S106 system to deliver infrastructure.

## 6.13 CS12 Housing Needs of the Community

Policy CS12 was informed by initial appraisal and appraised at submission (SAR, November 2008)

- 6.13.1 Policy CS12 strongly supports the objectives of meeting housing need, social inclusion and health and is not likely to result in any significant adverse impacts. In particular, it is noted that the Policy addresses concern that there may be too many 1 and 2 bed properties by making reference to meeting identified housing needs, including those of the elderly.

### How sustainability appraisal has influenced the development of this policy

Appraisal of Option 7 (PO May 2006) raised concern concerning overprovision of 1 and 2 bed properties and that a steer may be required to ensure an appropriate mix of properties is delivered. Policy CS12 responds to this concern and addresses the provisions of PPS3.

As stated for Policy CS10, above, the Infrastructure Capacity Study (ICS) indicated that there are no absolute restrictions on growth but this may rely on addition to sustainable design and an effective operation of the CIL/S106 system to deliver infrastructure.

## 6.14 CS13 Affordable Housing

Policy CS13 was informed by initial appraisal and appraised at submission; significant changes have been appraised by peer review in February 2012.

- 6.14.1 Policy CS13 strongly supports improved health and wellbeing, reducing poverty and social exclusion and safe communities.
- 6.14.2 Core Strategy policy CS13 now asks for the provision of 30% affordable housing on new development sites of 15 or more dwellings, financial contributions are asked for on a sliding scale for developments of less than 15 dwellings. Suggested mitigation: Para 1.1.6 in CS could state “Consideration should be given to maximising opportunities for affordable housing delivery on any proposed urban extensions”. This should be explored in more detail in the DMP. Housing viability study should look at the viability of increasing affordable housing target on Greenfield.
- 6.14.3 The SHMA supports a 40/60 split (rented/shared-ownership), this will be covered in the Affordable Housing SPD (in order to allow for flexibility), this will not undergo SA and cannot be appraised at this stage as there is limited information as to how this will be delivered.
- 6.14.4 The SHMA indicates that in order to meet affordable housing need a percentage of at least 40% should be set for all suitable sites. The 30% figure included in the policy reflects viability information. One consequence of not providing sufficient affordable housing is that there would be more net commuting into the Borough for key workers, thereby contributing to air quality issues and potentially impacting on sensitive wildlife habitats.

### How sustainability appraisal has influenced the development of this policy

Appraisal of Option 8 (PO May 2006) identified that affordable housing policy should seek to maximise the amount of affordable housing delivered in the plan period; delivering benefits in respect of improved health and wellbeing of the whole population, reducing poverty and social exclusion and to help create and maintain safer and more secure communities. The availability of affordable housing would also support the local labour supply.

Options considered previously (Issues and Options 2005) identified that lowering the threshold number of houses before requiring affordable housing (B1a) would be likely to deliver more housing given the high density strategy, which supports viability. Concern was expressed, however, that layout and design should seek to minimise social stratification. Not lowering the threshold (B2a) would increase the risk of not meeting affordable housing targets during the plan period. A similar impact was predicted with respect to an increased requirement for the proportion of affordable housing (B2a and B2b).

Appraisal found that the options of using greenfield sites through an exceptions policy (B3a) would provide affordable homes in a pleasant environment, but could contribute to isolation and less mixed communities. The similar use of employment sites (B4a) could offer an appropriate mix and good accessibility, although the sites are limited in number and likely to only provide for the short to medium-term. Building more homes on employment land, however, threatens the ability of the Borough to respond to the future needs of the economy, without putting pressure on the Green Belt. Requiring contributions from commercial development (B5a) would support provision, although it may affect commercial viability.

The peer review carried out in February 2012 led to changes to the supporting text of CS13 to clarify that the Council will seek to maximise affordable housing provision on urban extension sites.

## 6.15 CS14 Gypsies, Travellers and Travelling Showpeople

Policy CS14 was informed by initial appraisal then following revisions appraisal was carried out on the Schedule of changes to the Core Strategy A& B (July 2010).

- 6.15.1 Policy CS14 seeks to ensure Gypsy and Traveller needs are met. It includes criteria to protect amenity and improve integration with other uses. In reiterating the presumption against development in the Green Belt, the Policy addresses concerns raised in the appraisal of Option 9 (PO May 2006) that there has been a historical preference for Greenfield sites. In the appraisal of changes (July 2010 – see Appendix F) the policy scored positively in considering first urban areas for the sites, thereby giving good access to facilities and services, reducing social exclusion and the need to travel (for everyday use of facilities, schools etc). The policy scored positively against SA objective 18 for considering the provision of space for business needs of the travelling community.

### How sustainability appraisal has influenced the development of this policy

Appraisal of Option 9 (PO May 2006) identified that provision for gypsies and travellers meets a need and would generally be positive. The redrafted policy in July 2010 addressed concerns raised at Preferred Options stage regarding Green Belt use by the use of a sequential approach to site allocation. Whilst the loss of Green Belt

land is an issue in its own right it is also noted that more urban locations would enjoy better accessibility and integration. The criteria provide an appropriate range of considerations to ensure adverse impacts can be avoided.

## 6.16 CS15 Travel Options and accessibility

Policy CS15 was informed by initial appraisal and appraised at submission as policy CS16 and CS17 (SAR, November 2008)

- 6.16.1 Policy CS15 strongly supports the reduction in travel by car and is a key element in facilitating a strategy of high density development. Good accessibility to services by a variety of modes supports health and well being as well as social inclusion. Cycling and walking would improve health of the individual.
- 6.16.2 Whilst not considered to be significant at the strategic level, improved provision for walking and cycling can play a role in improving safety of public areas and enhancing biodiversity. Public transport, walking and cycling are more resource efficient modes of transport than the private car and will help improve air quality. Reducing congestion is also an important factor in achieving sustainable economic growth. The DMP and RAAP should pay particular attention to addressing the contribution of vehicle related emissions to AQMAs.
- 6.16.3 In the Low Weald area this is also important to reduce air pollution. An opportunity exists through the Redhill Area Action Plan to strongly support improved use of rail.
- 6.16.4 Policy CS15 reinforces the locational strategy (Policy CS4) in its aim to direct development to the most accessible areas of the Borough. This supports health and well being and social inclusion, as well as reducing the need to travel by car. A sustainable pattern of transport is fundamental to sustainable economic growth and a high-density strategy for the provision of housing. It is considered that Policy CS15 supports the objective of addressing the causes and consequences of climate change in principal, but it will be in the detail of the DMP where access and flood risk can be addressed.

### How sustainability appraisal has influenced the development of this policy

Appraisal of E1, E3 and E4 at the issues and options stage, 2005, identified that the proposal to require provision for public transport, walking, cycling and car sharing would help to help balance increased population and improved accessibility to the main centres with the potential to exacerbate congestion. It is considered that such an approach is essential to support a high density strategy.

The development strategy seeks to place development in the most accessible locations. Appraisal of Option 6 (Preferred Options) has 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 at Merstham, Coulsdon South, Salford, and Earlswood. Appraisal recommends that the potential for a new rail station should also be considered.

Increased cycling and walking is also considered to encourage healthier lifestyles, but would need to be supplemented by policy/criteria with respect to safety.

## **6.17 Monitoring**

6.17.1 Sustainability Appraisal indicates that the proposed Core Strategy has sound sustainability credentials, but there are some areas where adverse impacts might occur and it is recommended that these be monitored. In addition, monitoring can help identify areas where benefits are not being maximised. Progress with respect to the implementation of the Core Strategy DPD will be monitored through the Annual Monitoring Report for the LDF.

6.17.2 The following list identifies issues that can be monitored through the Annual Monitoring Report or Sustainability Appraisal process to ensure that the Borough Council is aware of the impact of the Local Development Framework on economic, social and environmental interests.

- Delivery of affordable housing
- Implementation of the SAC Mitigation Plan
- Provision of sufficient urban open land
- Meeting the appropriate level of Code for Sustainable Homes
- Meeting the appropriate level of BREEAM
- Delivery of regeneration priorities and development of previously developed land
- Air Quality Management Areas
- Increasing capacity of renewable energy
- Improving provision for walking
- Improving provision for cycling
- Improving provision for public transport
- Protecting cultural and heritage interests
- Protecting the landscape

APPENDIX A: Checklist of how the requirements of the SEA Directive have been met

**Table 1. Meeting the requirement of the SEA Directive**

<i>REQUIREMENT of SEA DIRECTIVE</i>	<b>SECTION OF REPORT</b>
(a) An outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes	Section 2.2 to 2.5
(b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Section 4 Appendix D Borough Wide Character Assessment (Appendix D)
(c) The environmental characteristics of areas likely to be significantly affected	Section 4 Appendix D Borough Wide Character Assessment (Appendix D)
(d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC	Section 4.3
(e) The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation	Section 5 Section 6
(f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors	Section 6

(g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme	Section 6
(h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	Section 6
(i) A description of the measures envisaged concerning monitoring in accordance with Article 10	Section 6.2
(j) A non-technical summary of the information provided under the above headings	Section 1

## APPENDIX B List of relevant policies, plans and programmes influencing the LDF

### International

---

The Johannesburg Declaration on Sustainable Development  
European Spatial Development Perspective (97/150/EC)  
European Habitats Directive (Special Areas of Conservation (SACs)) (92/43/EEC)  
European Birds Directive (79/409/EEC)  
European Nitrates Directive  
European Air Quality Directive (2008)  
European Water Framework Directive (2000/60/EC)  
European Waste Framework Directive (2005)  
European Environmental Impact Assessment Directive (97/11/EC)  
European Strategic Environmental Assessment Directive (2001/42/EC)  
European Energy Performance of Buildings Directive (2002/91/EC)  
European Noise Directive (2001/14/EC)  
European Convention on the Protection of Archaeological Heritage (Valetta Convention) (2001)  
Aarhus Convention 1998 (UN Economic Commission for Europe (UNECE) Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters  
Sixth Environmental Action Programme for the European Community (2002-2012)  
Kyoto Protocol on Climate Change (2002)  
United Nations Convention on Human Rights  
European Landscape Convention (Florence Convention 2000)  
The Water Framework Directive and Planning, Initial Advice to Planning Authorities in England and Wales (2006)  
European Waste Framework Directive 75/442/EEC on waste, amended by Council Directive 2006/12/EC  
European Sustainable Development Strategy

### National - Plans and Strategies

---

Securing The Future - UK Sustainable Development Strategy (March 2005)  
Sustainable Communities Plan: Building for the Future  
Rural White Paper (2000) - Our Countryside: The Future  
UK Biodiversity Action Plan (1994)  
Working with the grain of nature: A Biodiversity Strategy for England (October 2002)  
Rural Strategy (2004)  
Farming and Food Strategy  
Energy White Paper (May 2007)  
National Air Quality Strategy (2008)  
Aviation White Paper - The Future of Air Transport  
10 Year Transport Plan (2000)  
White Paper on the Future of Transport: a network for 2030 (July 2004)  
UK Climate Change Programme (2006)  
Water Act 2003  
Making the Past Part of our Future - English Heritage Strategy 2005-2010  
Code for Sustainable Homes: Setting the Standard in Sustainability for New Homes (Feb

2008)

Code for Sustainable Homes : Building A Greener Future – Towards Zero Carbon Development

Environmental Quality and Spatial Policy: Incorporating the natural, built and historic environment and rural issues in plans and strategies (2005)

Safer Places – The planning System and Crime Prevention (CLG 2004)

Strategic Environmental Assessment and Biodiversity: Guidance for practitioners (June 2004)

UK Renewable Energy Strategy (2009)

Planning & Energy Act (2008)

Climate Change Act (2008)

Civil Aviation Act (2006)

Waste Strategy for England and Wales (revised 2007)

The Historic Environment: A Force for our Future (2001)

The Framework for Sport in England (2004)

#### National – Guides and Circulars

---

National Planning Policy Framework (2012)

(The following guides and circulars have, in most cases, been replaced by the NPPF. However they were used to define the scope of the appraisal)

Planning Policy Statement 1: Delivering Sustainable Development (2005)

Planning and Climate Change (supplement to PPS1) (Dec 2007)

Planning Policy Guidance Note 2: Green Belts (1995)

Planning Policy Statement 3: Housing (2006)

Planning Policy Statement 4: Planning for Sustainable Economic Growth (2009)

Planning Policy Statement 5: Planning for the Historic Environment

Planning Policy Statement 7: Sustainable Development in Rural Areas (2004)

Planning Policy Guidance Note 8: Telecommunications (2001)

Planning Policy Statement 9: Biodiversity and Geological Conservation

Consultation paper on a new Planning Policy Statement: Planning for a Natural and Healthy Environment

Planning Policy Statement 10: Planning for Sustainable Waste Management

Planning Policy Statement 12: Local Spatial Planning (2008)

Planning Policy Guidance Note 13: Transport (2001)

Planning Policy Guidance Note 14: Development on Unstable Land

Planning Policy Guidance Note 17: Planning for Open Space, Sport and Recreation (2003) and Companion Guide: Assessing Needs and Opportunities

Planning Policy Guidance Note 18: Enforcing Planning Control (1991)

Planning Policy Guidance Note 19: Outdoor Advertisement Control (1992)

Planning Policy Statement 22: Renewable Energy (2004)

Planning Policy Statement 23: Planning and Pollution Control (2004)

Planning Policy Guidance Note 24: Planning and Noise (1994)

Planning Policy Statement 25: Development and Flood Risk

Circular 01/06 – Planning for Gypsy and Traveller Caravan Sites

Circular 04/07 – Planning for Travelling Showpeople

Circular 5/05 Planning Obligations

Circular 06/2005 Biodiversity and Geological Conservation

Consultation on a Planning Policy Statement: Planning for a Low Carbon Future in a Changing Climate

The Framework for Sport in England (2004)  
White Paper: Our Towns and Cities: The Future (2000)  
The Wildlife and Countryside Act (1981)  
Good Practice Guide on Tourism (2006)

#### Regional and Sub Regional

---

South East Plan (May 2009)  
South East Plan Partial Review – Provision for Gypsies, Travellers and Travelling Showpeople – Policy H7 (June 2009)  
Regional Transport Strategy (2004)  
Regional Housing Strategy (2006)  
Regional Economic Strategy (2006-2016)  
Regional Waste Strategy (2004)  
Regional Strategy for Energy Efficiency and Renewable Energy (2004)  
South East Regional Sustainability Framework (May 2008)  
Social Inclusion Statement (SEERA and Partners, 2002)  
The Cultural Cornerstone: A Strategy for the development of cultural activity and its benefits in the South East (June 2001)  
The Cultural Agenda: realising the cultural strategy of the South East (November 2002)  
Gatwick Diamond Local Strategic Statement (draft)  
South East Biodiversity Strategy (SEBS)  
Catchment Flood Management Plan (THAMES)  
Regional Housing Strategy (2008-2011)  
London Spatial Development Strategy 2004  
The South East Plan For Sport 2004-08

#### County

---

Surrey Waste Plan 2008  
Surrey Minerals Local Plan 1993  
Surrey Minerals Plan – Preferred Option 2008  
Surrey Local Transport Plan – LTP3 (January 2011)  
Surrey Strategic Partnership Plan 2009-2020 – Standing up for Surrey  
Surrey Hills Area of Outstanding Beauty Management Plan 2009  
Surrey Hills Area of Great Landscape Value Review 2007  
Surrey Economic Development Action Plan (1999)  
Surrey Education Service Strategy  
Surrey Education Organisation Plan 2010-2019  
Surrey's Medium Term Strategy for Adults and Community Care  
Surrey Biodiversity Action Plan (1999)  
Surrey Cultural Strategy: Taking Part in Surrey (2008-2011)  
Surrey Local Government Association Key Worker Strategy – Housing to underpin economic success  
Surrey Economic Partnership (SEP) Economic Strategy  
Surrey Heritage Strategy (2001)  
Surrey Rural Strategy  
Surrey Sports Strategy  
Parking Strategy for Surrey (2003)  
Surrey Crime and Disorder Reduction Strategy 2005 – 2008  
Surrey Design – A Strategic Guide for a Quality Built Environment (2001)  
Future of Surrey's Landscape & Woodlands (1997)

Draft Surrey Rural Strategy 2010-2015  
Surrey Local Transport Plan – Annual Progress Report (2007)  
Surrey Road Safety Strategy 2008 - 2011

Local

---

East Surrey Housing Strategy 2009-2013  
Extra Care Housing Strategy for Mid Surrey (2005)  
East Surrey Rural Transport Partnership Action Plan  
Gatwick Airport Master Plan (2005)  
East Surrey NHS Primary Care Trust Business Plan 2003-4  
Surrey Primary Care Trust (PCT) Annual Report 2008-09  
Housing Infrastructure Thematic Board

## APPENDIX C: SA objectives and decision aiding questions

As part of an East Surrey working group a SA framework has been established which includes SA objectives and decision aiding questions. The questions help in the testing of the plan objectives against the sustainability objectives.

	<b>SA Objectives</b>	<b>Decision Aiding Questions</b>
1	To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	<ul style="list-style-type: none"> <li>• Will the option help provide a supply of affordable homes to meet identified needs?</li> <li>• Will the option increase the rate of provision of affordable housing?</li> <li>• Will the option help to reduce the number of homeless in the Borough?</li> <li>• Will the option increase the amount of extra-care accommodation?</li> <li>• Will the option reduce the number of unfit homes?</li> </ul>
2	To facilitate the improved health and wellbeing of the whole population, including enabling people to stay independent.	<ul style="list-style-type: none"> <li>• Will the option help to improve the health of the community?</li> <li>• Will the option reduce health inequalities?</li> <li>• Will the option improve access to health provision?</li> <li>• Will the option encourage healthy lifestyles?</li> <li>• Will the option help people to remain independent?</li> <li>• Will the option enhance access to and quality of recreation?</li> </ul>
3	To reduce poverty and social exclusion.	<ul style="list-style-type: none"> <li>• Will the option address issues of deprivation?</li> <li>• Will the option help to overcome social exclusion?</li> <li>• Will the option address issues of poverty in identified areas?</li> <li>• Will the option improve access to key services (education, employment, recreation, health, community services, cultural assets)?</li> <li>• Will the option improve the provision of affordable transport?</li> <li>• Will the option provide additional assistance to single parents, the elderly, those with ill health or disability?</li> <li>• Will the option improve participation in further education?</li> </ul>
4	To create and maintain safer and more secure communities.	<ul style="list-style-type: none"> <li>• Will the option help to reduce crime levels?</li> <li>• Will the option help to reduce the fear of crime?</li> <li>• Will the option reduce concerns associated with specified urban areas?</li> <li>• Will the option reduce concerns relating to other identified areas?</li> <li>• Will the option help to “design out crime”?</li> <li>• Will the option increase natural surveillance?</li> <li>• Will the option improve road safety?</li> </ul>
5	To minimise the harm from flooding.	<ul style="list-style-type: none"> <li>• Will the option reduce the risk of flooding to the development?</li> <li>• Will the option reduce the risk of flooding to adjacent development?</li> <li>• Will the option help to reduce the rate of run-off?</li> <li>• Will the option ensure that climate change extremes can be withstood?</li> </ul>
6	To improve accessibility to all services and facilities.	<ul style="list-style-type: none"> <li>• Will the option support an efficient public transport infrastructure?</li> <li>• Will the option support access routes to and within town centres?</li> <li>• Will the option support access to major facilities and services from rural areas?</li> </ul>
7	To make the best use of previously developed land and existing buildings.	<ul style="list-style-type: none"> <li>• Will the option encourage the re-use of existing buildings? (see sustainability objective 10. regarding historic buildings)</li> <li>• Will the option help ensure that minimal non-renewable resources are used in construction?</li> <li>• Will the option help minimise the “whole life cycle” use of natural resources?</li> <li>• Will the option encourage the use of recycled products?</li> <li>• Will the option make the best use of PDL, so as to deliver sustainable development?</li> </ul>
8	To reduce land contamination and safeguard soil quality and quantity.	<ul style="list-style-type: none"> <li>• Will the option reduce the risk of creating further contamination?</li> <li>• Will the option help to reduce the risk of contamination from designated sites?</li> <li>• Will the option help to remediate contaminated sites?</li> <li>• Will the option encourage on-site remediation?</li> <li>• Will the option prevent soil erosion?</li> </ul>
9	To ensure air quality continues to improve.	<ul style="list-style-type: none"> <li>• Will the option help improve air quality?</li> <li>• Will the option support specific actions in designated AQMAs?</li> <li>• Will the option encourage the creation of tranquil areas?</li> </ul>

10	To reduce noise pollution.	<ul style="list-style-type: none"> <li>• Will the option increase noise pollution from traffic and aircraft?</li> <li>• Will the option encourage the creation of tranquil areas?</li> </ul>
11	To reduce light pollution.	<ul style="list-style-type: none"> <li>• Will the option reduce light pollution?</li> </ul>
12	To maintain and improve the water quality of the region's rivers and groundwater.	<ul style="list-style-type: none"> <li>• Will the option increase pollution of groundwater, watercourses and rivers from run-off/point sources?</li> <li>• Will the option increase the demand for water?</li> <li>• Will the option encourage Sustainable Urban Drainage Schemes?</li> <li>• Will the option encourage water to be stored for re-use?</li> <li>• Will the option allow the improved management of sewage?</li> <li>• Will the amount of nitrates/phosphates entering the water environment be reduced?</li> </ul>
13	To conserve and enhance biodiversity within the plan area.	<ul style="list-style-type: none"> <li>• Will the option secure enhancement in biodiversity in all new development?</li> <li>• Will the option continue to protect formally designated areas of nature conservation?</li> <li>• Will the option create more habitats?</li> <li>• Will the option prevent fragmentation, and increase connectivity, of habitats?</li> <li>• Will the option enhance urban biodiversity?</li> <li>• Will the option take account of the effects of climate change on biodiversity?</li> <li>• Will the option adequately defend and enhance protected species?</li> <li>• Will the option enhance understanding of the importance of biodiversity?</li> </ul>
14	To protect and enhance the natural, archaeological and historic environments and cultural assets.	<ul style="list-style-type: none"> <li>• Will the option continue to protect and/or enhance the Borough's cultural assets?</li> <li>• Will the option improve equitable access to the Borough's cultural assets?</li> <li>• Will the option promote sensitive re-use of culturally important buildings, where appropriate?</li> <li>• Will the option increase equitable access to the urban fringe?</li> <li>• Will the option protect and enhance the Borough's natural urban greenspace?</li> <li>• Will the option enhance access to natural urban greenspace?</li> <li>• Will the option ensure the effects of climate change are considered?</li> </ul>
15	To reduce road congestion and the need to travel.	<ul style="list-style-type: none"> <li>• Will the option reduce congestion?</li> <li>• Will the option reduce the need to travel, especially by car/lorry?</li> <li>• Will the option reduce the need for car ownership?</li> <li>• Will the option increase walking/cycling levels?</li> <li>• Will the option help provide walking/cycling/public transport infrastructure?</li> <li>• Will the option be accommodated within the existing public transport constraints?</li> <li>• Will the option reduce pollution from traffic?</li> <li>• Will the option reduce the need for road freight?</li> </ul>
16	To reduce greenhouse gases.	<ul style="list-style-type: none"> <li>• Will the option reduce the quantity of greenhouse gases released into the atmosphere?</li> </ul>
17	To ensure that the District is prepared for the impacts of climate change.	<ul style="list-style-type: none"> <li>• Will the option mean that "cradle to grave" energy is reduced?</li> <li>• Will the option help in protecting the community from the extremes of climate change?</li> <li>• Will the option increase the ability of the community to become more self sufficient, so as to withstand major weather events?</li> <li>• Will the option reduce the opportunity to adapt in the future?</li> </ul>
18	Provide for unemployment opportunities.	<ul style="list-style-type: none"> <li>• Will the option encourage the provision of jobs accessible to residents?</li> <li>• Will the option help maintain the supply of labour?</li> <li>• Will the option help increase knowledge based skills?</li> <li>• Will the option improve and encourage facilities for life-long learning, and access to them?</li> <li>• Will the option promote a work-life balance?</li> <li>• Will the option contribute to enhancing the vitality, viability and attractiveness of town/local centres?</li> <li>• Will the option provide opportunities for the provision of care for dependants? (see sustainability option 2 – social inclusion)</li> </ul>
19	Make land available to meet the needs of the economy.	<ul style="list-style-type: none"> <li>• Will the option provide for the needs of economy, especially local business?</li> <li>• Will the option encourage rural diversification?</li> </ul>
20	Support economic growth which is inclusive, innovative and sustainable.	<ul style="list-style-type: none"> <li>• Will the option enhance the viability, vitality and attractiveness of urban centres and encourage their commercial renewal?</li> </ul>

21	To achieve sustainable production and use of resources.	<ul style="list-style-type: none"> <li>• Will the option help reduce the environmental impacts of products and services?</li> <li>• Will the option help stabilise the Borough's ecological footprint?</li> <li>• Will the option encourage self-sufficiency?</li> <li>• Will the option encourage the use/supply of sustainable and/or local products/services?</li> <li>• Will the option reduce the use of primary resources, or create markets for recycled materials?</li> <li>• Will the option increase residents' awareness of the environmental impacts of their lifestyle choices?</li> </ul>
22	To increase energy efficiency of new and existing development.	<ul style="list-style-type: none"> <li>• Will the option reduce the need for energy use?</li> <li>• Will the option help to reduce fuel poverty?</li> <li>• Will the option improve the energy efficiency of the building stock?</li> <li>• Will the option support de-centralised energy generation?</li> <li>• Will the option support the development of CHP?</li> </ul>
23	To increase the production and use of renewable energy.	<ul style="list-style-type: none"> <li>• Will the option facilitate the generation/use of renewable energy?</li> <li>• Will the option support the production/use of biomass?</li> <li>• Will the option support the use of wind as energy?</li> <li>• Will the option support the use of sun as energy?</li> <li>• Will the option support the collection and use of organic waste as a fuel?</li> </ul>

## APPENDIX D Sustainability Appraisal Baseline Report October 2005

Due to the size of this file, this appendix has been made into a separate PDF. This PDF is available alongside this document.

You can download this Appendix from [http://www.reigate-banstead.gov.uk/planning/planning\\_policies/local\\_development\\_framework/sustainability\\_appraisal/scoping/index.asp](http://www.reigate-banstead.gov.uk/planning/planning_policies/local_development_framework/sustainability_appraisal/scoping/index.asp)

**Or call 01737 276000 to request a copy.**

APPENDIX E – Appraisal matrices for February 2012 revision

The Core Strategy has been through a number of iterations; each one has been appraised and reported on through the SA process. It is for this reason that only certain changes to the document required appraisal at the Submission 2012 stage. The table below shows which areas required appraisal at this stage. Following this table are the results from the submission 2012 appraisal.

Policy / paragraph	Stage appraisal was carried out	Additional appraisal required in Feb 2012:
<b>Vision</b>	Preferred options	Not needed.
<b>Objectives</b>	Through CS policies, not as stand alone objectives.	Not needed.
<b>CS1</b>	Submission, schedule A & B changes.	Loss of 800m buffer, inclusion on word 'enhanced' in point d and e. (Reason: difficult to justify and implement – all development subject to HRA)
<b>CS2</b>	Submission	e. Be designed sensitively to reflect local heritage and to protect and enhance the historic environment.
<b>CS3</b>	Submission. Part 1 c, d, e & f through outstanding issues.	Not needed.
<b>CS4</b>	Submission as CS4/CS5, Schedule A & B changes. Outstanding Issues	Beyond 2022 review
<b>CS5</b>	Submission as CS6	Not needed.
<b>CS6</b>	Outstanding issues consultation	Not needed.
<b>CS7</b>	Submission as CS8	Not needed.
<b>CS8</b>	Submission as CS9	3 [...] and which are designed to be safe, secure and socially inclusive. 8. Be designed to minimise pollution, including air, noise and light and to safeguard water quality. 10. Floodplain compensation?
<b>CS9</b>	Submission as CS10	Significantly changed, full appraisal required.
<b>CS10</b>	Submission as CS11	Not needed.
<b>CS11</b>	9,240 at submission, 10,000 & 12,500 post submission mods for the inspector. Range between	Not needed. Urban extensions – see CS4

	300 – 980 pa at outstanding issues.	
<b>CS12</b>	Submission as CS13	Not needed.
<b>CS13</b>	Submission as CS14 – 40% in 15+, >15 financial contribution.	Appraisal required on 30% figure.
<b>CS14</b>	Submission as CS15	Not needed.
<b>CS15</b>	Submission as CS16/CS17	Not needed.

**CS1: No significant change to appraisal score. No further recommendations.**  
**CS2: No significant change to appraisal score. No further recommendations.**

CS4 Allocation of Land for Development (Beyond 2022 only)					
Beyond 2022					
1. Sustainable urban extensions may be required. The precise scale and location of these will be determined through further study guided by the criteria for sustainable development set out in CS8 and consideration of landscape character and sensitivity. Areas of search will include:					
a. Those areas of land that have a realistic chance of being developed (not covered by constraints such as AONB) and are not within proximity of the Mole Gap to Reigate Escarpment (to avoid any urbanising impact on the SAC).					
b. Those areas which adjoin the urban area and are accessible to existing public transport/service provision.					
c. Those areas of land which do not make a significant contribution to fulfilling Green Belt functions.					
7	SA Objective	Assessment			7.1 Comments \ Proposed Mitigation
		Short Term	Medium Term	Long Term	
	1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.			++	A higher number of affordable housing units could be sought than the 30% set in the CS.
	2. To facilitate the improved health and wellbeing of the whole population.			+	<b>This criterion is also dependent on the size and density of the urban extension, a large scale development will give opportunities for local healthcare.</b>
	3. To reduce poverty and social exclusion.			+	<b>Point 3 CS8</b>
	4. To create and maintain safer and more secure communities.			+	Point 3 CS8
	5. To minimise the harm from flooding.			+	<b>Point 10 CS8</b>
	6. To improve accessibility to all services and facilities.			+	<b>Criteria B and CS8 point 2. This criterion is also dependent on the size and density of the urban extension. A large scale development will give opportunities for infrastructure and facilities improvements.</b>
	7. To make the best use of previously developed land and existing buildings.			+	The policy specifies 'if other development opportunities within the urban area are exhausted' so this does not conflict with regeneration initiatives and use of PDL.
	8. To reduce land contamination and safeguard soil quality and quantity.			-	This is dependent on the area that is to be developed, and could potentially be negative if greenfield land were to be selected. This would be further appraised at the DMP stage when areas of search are being appraised on their own merits. Mitigation could be provided through green infrastructure, and directing development to land with soil of low quality.
	9. To ensure air quality continues to improve.			-	<b>Increased development may have a negative impact on the air quality of the area to be developed. This could be mitigated by ensuring that public transport serves the area well and that travel plans are in place before the development is occupied.</b>

10. To reduce noise pollution.			0	Design issue needs to be addressed through the DMP
11. To reduce light pollution.			0	<b>The issue of light must be addressed through the DMP so as not to impact on wildlife and dark sky.</b>
12. To maintain and improve the water quality of the region's rivers and groundwater			0	Point 8 CS8, again dependent on area.
13. To conserve and enhance biodiversity within the plan area			0	There may be a negative impact dependent on the area chosen, the SAC is to be avoided, and other wildlife areas will be taken into account when selecting area for urban extension. Areas for wildlife can be enhanced within and surrounding the development.
14. To protect and enhance the natural, archaeological, historic environments and cultural assets			0	Landscape character sensitivity is covered within policy CS4. Care must be taken to assess views into and out of new development, and AONB/AGLV.
15. To reduce road congestion and the need to travel			0	<b>Criteria B and CS8 point 2. This criterion is also dependent on the size and density of the urban extension. A large scale development will give opportunities for infrastructure and facilities improvements.</b>
16. To reduce greenhouse gases			0	Increased development may impact negatively on this criterion, but no more so than for the same quantity of development within the existing urban area. Opportunity for carbon neutral development.
17. To ensure that the District is prepared for the impacts of climate change			0	Covered by CS8 point 9
18. Provide for employment opportunities			0	
19. Make land available to meet the needs of the economy			0	
20. Support economic growth which is inclusive, innovative and sustainable			++	Housing for workers supports economic growth.
21. To achieve sustainable production and use of resources			0	CS8 point 7 aims to achieve this
22. To increase energy efficiency of new and existing development.			0	CS8 point 7 aims to achieve this.
23. To increase the production and use of renewable energy.			+	CS8 point 7 aims to achieve this. This could be positive depending on the scale of development.
<p><b>Summary:</b>  Increased development will negatively impact on a number of the environmental criteria, although in some cases this impact would not be any greater than it would be with the same quantity of development being directed to the existing urban area. Mitigation suggested involves efficient transport planning and green infrastructure associated with the development.</p> <p>The scale of development is key to realising a number of sustainability objectives, if large enough the development could carry facilities such as shops, school, community buildings, and health care buildings thereby reducing the need to travel. Public transport facilities and travel plans could be effective for a large community. CHP and other renewable energy initiatives will also have greater viability for a larger development. A large development will also address the housing need and provide workers to enable economic stability/growth in the Borough.</p> <p>At this stage there are no areas put forward for appraisal. The criteria set in the Core Strategy are sufficient to enable a search of areas for urban extensions to be carried out. Any area put forward for development as an urban extension will be appraised on its own merits and as a cumulative impact with currently planned development within the existing urban area. A number of areas will need to be appraised to ensure a sufficient number of alternatives are considered.</p> <p>Broad locations for growth were appraised at the 'Outstanding Issues' stage. See appendix F for the results of this appraisal.</p>				

<b>CS9 Sustainable construction</b>				
8 SA Objective	Assessment			8.1 Comments \ Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.		NA		
2. To facilitate the improved health and wellbeing of the whole population.		+		Promotes good building standards.
3. To reduce poverty and social exclusion.		+		Fuel poverty not changed as building regs component for energy the same as CSH. CSH requires you to meet Lifetime Homes standards.
4. To create and maintain safer and more secure communities.		++		Points achieved by complying with secured by design or similar guidance.
5. To minimise the harm from flooding.		+		Points achieved by compliance with standards for flooding – although this is covered by CS8.
6. To improve accessibility to all services and facilities.		+		CSH requires you to meet Lifetime Homes standards.
7. To make the best use of previously developed land and existing buildings.		NA		
8. To reduce land contamination and safeguard soil quality and quantity.		+		Points achieved for reducing contamination associated with construction.
9. To ensure air quality continues to improve.		+		Emissions covered by CSH
10. To reduce noise pollution.		+		Covered by CSH
11. To reduce light pollution.		NA		
12. To maintain and improve the water quality of the region's rivers and groundwater		+		Surface water run-off and construction site impacts on water consumption covered by CSH
13. To conserve and enhance biodiversity within the plan area		++		Covered by CSH (protect and enhance).
14. To protect and enhance the natural, archaeological, historic environments and cultural assets		NA		
15. To reduce road congestion and the need to travel		+		Cycle facilities covered in CSH (CSH higher than Surrey's requirements)
16. To reduce greenhouse gases		NA		Met by building regs
17. To ensure that the District is prepared for the impacts of climate change		+		
18. Provide for employment opportunities		NA		
19. Make land available to meet the needs of the economy		NA		
20. Support economic growth which is inclusive, innovative and sustainable		NA		
21. To achieve sustainable production and use of resources		+		CSH efficient use of resources covered in CSH
22. To increase energy efficiency of new and existing development.		+		In building regs – although opportunity to enhance benefits. Positive in relation to energy networks point 3.
23. To increase the production and use of renewable energy.		+		

Summary: This policy was appraised by considering the use of a policy requiring CSH across the board as opposed to relying on building regulations alone.

Point 1 wording is unclear.

To be carried over to the appraisal of Development Management Policies DPD:

Qualification of Code – CSH4 – minimum standard where feasible and viable.

The DMP should give consideration as to whether there needs to be some additional direction as to whether you minimise or maximise particular facets in relation to particular sites. Explanation should be given about how to maximise benefits e.g. increased cycle facilities on a site close to a town centre with a reduction in another facet. Certain elements should be given priority in certain areas in the DMP.

CS13 Affordable Housing				
9 SA Objective	Assessment			9.1 Comments \ Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.		-		Para 1.1.6 in CS could suggest "Consideration should be given to maximising opportunities for affordable housing delivery on any proposed urban extensions". This should be explored in more detail in the DMP. Housing viability study should look at the viability of increasing affordable housing target on greenfield. The SHMA supports a 40/60 split (social/shared-ownership), this will be covered in the Affordable Housing SPD (in order to allow for flexibility), this will not undergo SA, this cannot be appraised at this stage as there is limited information as to how this will be delivered. The SHMA indicates it would be impossible to meet need of affordable housing and suggested setting percentage of at least 40% for all suitable sites.
2. To facilitate the improved health and wellbeing of the whole population.		+		For the units that this will deliver this is positive in relation to the qualifying households. This policy provides a local workforce and encourages a more stable community.
3. To reduce poverty and social exclusion.		+		For those qualifying households. Design and location should not differentiate from market housing – this will be covered in the DMP.
4. To create and maintain safer and more secure communities.		0		The design aspects of this will be covered in the DMP
5. To minimise the harm from flooding.		NA		This relates to the increase in housing in general, rather than what type of housing. This will be mitigated by CS8 and subsequent DPDs.
6. To improve accessibility to all services and facilities.		+		More stable communities will have better access but infrastructure is required to be in place in a timely manner in order to serve the increase in population.
7. To make the best use of previously developed land and existing buildings.		NA		
8. To reduce land contamination and safeguard soil quality and quantity.		NA		

9. To ensure air quality continues to improve.		NA		
10. To reduce noise pollution.		NA		Design will be addressed in DMP
11. To reduce light pollution.				Design will be addressed in DMP
12. To maintain and improve the water quality of the region's rivers and groundwater		NA		
13. To conserve and enhance biodiversity within the plan area		NA		
14. To protect and enhance the natural, archaeological, historic environments and cultural assets		NA		
15. To reduce road congestion and the need to travel		+		Local jobs for local people, this needs to be supported by strong DMP and Design & parking SPD policies on parking management. Refer to CS15.
16. To reduce greenhouse gases		+		Increase of local jobs will reduce greenhouse gas emissions from car / travel.
17. To ensure that the District is prepared for the impacts of climate change		NA		
18. Provide for employment opportunities		0		House building creates jobs, however not specific to affordable housing.
19. Make land available to meet the needs of the economy		0		
20. Support economic growth which is inclusive, innovative and sustainable		+		By provision of a workforce.
21. To achieve sustainable production and use of resources		NA		
22. To increase energy efficiency of new and existing development.		NA		
23. To increase the production and use of renewable energy.		NA		

**Summary:**  
Core Strategy policy CS13 now asks for the provision of 30% affordable housing on new development sites of 15 or more dwellings, financial contributions are asked for on a sliding scale for developments of less than 15 dwellings.  
Suggested mitigation: Para 1.1.6 in CS could state "Consideration should be given to maximising opportunities for affordable housing delivery on any proposed urban extensions". This should be explored in more detail in the DMP. Housing viability study should look at the viability of increasing affordable housing target on greenfield.  
The SHMA supports a 40/60 split (social/shared-ownership), this will be covered in the Affordable Housing SPD (in order to allow for flexibility), this will not undergo SA, so this cannot be appraised at this stage as there is limited information as to how this will be delivered.  
The SHMA indicates it would be impossible to meet need of affordable housing and suggested setting percentage of at least 40% for all suitable sites. One consequence of not providing sufficient affordable housing is that there would be more net commuting into the Borough for key workers, thereby contributing to air quality issues and potentially impacting on sensitive wildlife habitats.

## Appendix F Appraisal matrices / results from previous stages.

A number of previous versions of the Core Strategy have been appraised, and a report produced for each stage. The results / matrices for the following reports make up this appendix. (Submission 2012 results can be seen in appendix E)

<b>Sustainability Appraisal Reports produced for the Core Strategy</b>	
<b>Stage of document preparation</b>	<b>Date SA report published</b>
Issues and Options	November 2005
Preferred Options	May 2006
Preferred Options Revisited	May 2008
Submission	January 2009
Suggested Modifications to the Inspector	July 2009
Schedule A & B Changes	July 2010
Outstanding Issues	September 2011
Submission 2012	May 2012

Due to the size of the appendix it can be accessed as a separate document. This is available to download and can be accessed online alongside this SA report.

If you would prefer please contact the Council to request a paper copy.

Tel: 01737 276000

Email: [ldf@reigate-banstead.gov.uk](mailto:ldf@reigate-banstead.gov.uk)

APPENDIX G Table showing alternative options for each policy, and which stage they were appraised at.

**Vision**

The Core Strategy vision was established through consultation with the Local Strategic Partnership (LSP) to create a vision for the Community Plan. It was decided that the Core Strategy vision would replicate the Community Plan vision, as created by the LSP. The vision was appraised through the spatial objectives, as there was no opportunity to influence the vision itself.

**Objectives**

The objectives were first appraised at the preferred options stage (2006), this gave recommendations that fed into the next preferred options document (2008) as further detail for policy. Recommendations were put forward from the appraisal of the spatial objectives (2006) covering biodiversity, historic environment, sustainable construction, light pollution, local distinctiveness and new energy saving or renewable energy technology. The recommendations put forward were for the policy level or detailed design guidance rather than recommendations for changes to the spatial objectives.

**CS1 Valued landscapes and the natural environment**

<b>Alternatives considered</b>	<b>Stage of preparation</b>	<b>Reasons for de/selecting</b>	<b>SA/SEA conflicts</b>
C1a. Continue to protect ecological, historical and aesthetically important areas (e.g. Green Belt Areas of Outstanding Natural Beauty), sites and structures.	I&O 2005	Selected. Supported through public consultation. Ecological protection required by EU Directive.	Could restrict commercial development, pressure to release employment land for housing, and restrict rural diversification schemes. Protection of AONB may restrict renewable energy development.
C1b. Do not continue to protect ecological, historical and aesthetically important areas (e.g. Green Belt Areas of Outstanding Natural Beauty), sites and structures.	I&O 2005	Rejected as contrary to national and international policy. This option was not supported through consultation.	Development in the Green Belt could increase car miles.
BNE1. Continue to protect and enhance the Borough's: • Nationally protected areas including Areas of Outstanding Natural Beauty (AONB), Sites of Special Scientific Interest and Special Area of Conservation;	PO 2006	Selected. Supported through public consultation. Ecological protection required by EU Directive.	No conflicts identified at this stage.

- Metropolitan Green Belt;
- Sites of Nature Conservation Importance (SNICIs) 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.

Preferred Policy Approach 4 Protecting and Enhancing our Valued Landscapes and Natural Environment	PO 2008	Carried forward with minor changes	
---	---------	------------------------------------	--

Preferred Policy Approach 5 Green Infrastructure	PO 2008	This was carried forward in concept through CS10 and CS1.	Positive scoring across environmental and social SA objectives.
---	---------	---	---

The Council will conduct a comprehensive review of the Metropolitan Green Belt by 2012; such review taking into account the needs and demands for growth,	Submission 2009	Wording removed from policy CS1 but sustainable urban extensions (possibly in the Green Belt) are now indicated in policy CS4.	
---	-----------------	--	--

**Changes post submission 2009**

Change made	CS version	Why change was made
Removal of 800m buffer surrounding the SAC	Submission 2012	Buffer removed at request of Natural England, buffer was difficult to implement and justify.

**CS2 Valued Townscapes**

Alternatives considered	Stage of preparation	Reasons for carrying forward / rejecting	SA/SEA conflicts
C1a. Continue to protect ecological, historical and aesthetically important	I&O 2005	Selected. Supported through public consultation. Ecological protection	Protection of Green Belt may conflict with supply of affordable

areas (e.g. Green Belt Areas of Outstanding Natural Beauty), sites and structures.		required by EU Directive.	housing.
C1b. <i>Do not</i> continue to protect ecological, historical and aesthetically important areas (e.g. Green Belt Areas of Outstanding Natural Beauty), sites and structures.	I&O 2005	Rejected as 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.	I&O 2005	Carried forward. 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.
<i>Do not</i> require high quality design of buildings and public spaces promoting inclusive access, safety and security.	I&O 2005	Rejected	Scored negatively against the majority of social and environmental SA objectives.
UD3. 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	PO 2006	Carried forward to Option 7 PO 2008	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.
Option 7 Development, Protection of Character and Heritage and Urban Design	PO 2008	Carried forward to submission 2009.	Included requirement for environmentally responsible design and construction
<b>Changes post submission 2009</b>			
<b>Change made</b>	<b>CS version</b>	<b>Why change was made</b>	
Increased reference to heritage in policy CS2	Submission 2012	Highlighted in SA report at submission 2009 that CS2 should be setting the agenda with regards to heritage.	

### CS3 Valued People

Alternatives considered	Stage of preparation	Reasons for de/selecting
-------------------------	----------------------	--------------------------

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.	I&O 2005	Economic Market Assessment carried out in 2008 to inform further stages of the CS.	N/A
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)?	I&O 2005	The option of seeking to retain identified key strategic sites and sites in town centres was carried through to PO.	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.
<i>Do not</i> 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)?	I&O 2005	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.
Continue the current focus of regeneration initiatives in the borough on areas such as Redhill Town Centre and borough housing estates.	I&O 2005	Carried forward in line with Corporate Plan objectives.	At Issues & Options, continuing the focus of regeneration initiatives in the Borough on larger areas scored positively over the whole range of sustainability criteria, as it provides more substantial opportunities to improve the social, economic and environmental fabric.
Broaden the current	I&O 2005	No new regeneration areas have been	The SA concluded that

focus of regeneration initiatives to include smaller areas in the borough that are not reaching their potential.		identified.	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
E1. Include policies that provide for the more efficient re-use of existing employment land, subject to the results of an employment land review.	PO 2006	Carried forward to PO 2008 (Option 8)	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.
E3. 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.	PO 2006	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 Policy Approach 10 Regeneration	PO 2008	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 of design in ensuring urban open space, the public realm and green infrastructure to balance a policy of high density housing
<b>Changes post submission 2009</b>			
<b>Change made</b>	<b>CS version</b>	<b>Why change was made</b>	
A number of changes were made around recognising distinctive economic roles of different parts of the Borough, increasing flexibility, and making the best use of	Outstanding Issues	Updated to reflect economic evidence base update, changing policy landscape and new Corporate Plan.	

employment land.

### CS4 Allocation of Land for Development

Alternatives considered	Stage of preparation	Reasons for carrying forward / rejecting	SA/SEA conflicts
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.	I&O 2005	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.	I&O 2005	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.	I&O 2005	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.	I&O 2005	Carried forward in combination with other options	As above
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	PO 2006	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

<p>a range of factors (the character of areas, public transport, public services, resource efficiency and environmental impacts).</p>			<p>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.</p>
<p>Preferred Policy Approach 1 Spatial Location of Development Sustainable levels, locations and forms of development will be sought in accordance with the Borough stated objectives of this strategy and the objectives and policies of the South East Plan and agreed NGP growth. Therefore 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</p>	<p>PO 2008</p>	<p>Carried forward into policy CS4</p>	<p>SA stated that 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.</p>
<p>Preferred Policy Approach 12 Strategic Location of</p>	<p>PO 2008</p>	<p>As preferred option 1</p>	<p>Scored favourably provided development was in</p>

Housing		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.
<b>Changes post submission 2009</b>		
<b>Change made</b>	<b>CS version</b>	<b>Why change was made</b>
Policy CS5 (now amalgamated with policy CS4) but with Sustainable urban extensions removed.	Schedule A & B	Urban extensions were removed as suggested modifications to the Inspector due to the SHLAA evidence at the time. 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.
References to sustainable urban extensions (SUE) reinstated.	Outstanding Issues	Due to SHLAA revisions it was necessary to include potential for urban extensions for future growth. SA gave recommendations regarding scale of development and need for sustainable locations to be sought. SA will be carried out on potential SUEs.
Broad locations for development	Outstanding Issues	A number of broad locations were appraised including options such as urban intensification, urban open land and Green Belt.

### CS5 Town and Local Centres

<b>Alternatives considered</b>	<b>Stage of preparation</b>	<b>Reasons for carrying forward / rejecting</b>	<b>SA/SEA conflicts</b>
E2. 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.	PO 2006	This policy was included at PO stage to reflect national guidance. There was no alternative at previous stages. Carried forward to PO 2008	Conflicts may occur with SA objective to decrease congestion.
Preferred Policy Approach 9 Regional, Town and Local Centres	PO 2008	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.

**Changes post submission 2009**

<b>Change made</b>	<b>CS version</b>	<b>Why change was made</b>
Minor changes made for clarity and figures changed to reflect revised evidence.	Outstanding Issues	Amended for additional clarity and to reflect the revised retail and leisure evidence base. Resulted in no change to SA scoring.

**CS6 Area 1, 2a, 2b and 3**

<b>Alternatives considered</b>	<b>Stage of preparation</b>	<b>Reasons for carrying forward / rejecting</b>	<b>SA/SEA conflicts</b>
Area based policies were established through evidence provided by the Landscape and Townscape Character Assessment (June 2008)			
Area 2a (Redhill) 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.	I&O 2005	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.
Area 2a (Redhill) Adopt a business and employment-focused strategy for regenerating and revitalising Redhill Town Centre that	I&O 2005	Redhill options carried into RAAP process	Competition for land with housing. May exacerbate the lack of activity and natural surveillance. Development would increase traffic,

aims to consolidate the employment area and make it more successful and attractive for companies and staff.			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.	I&O 2005	Redhill options carried into RAAP process	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.	I&O 2005	Redhill options carried into RAAP process	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.	I&O 2005	Redhill options carried into RAAP process	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.
<b>Changes post submission 2009</b>			
<b>Change made</b>	<b>CS version</b>	<b>Why change was made</b>	
Policy restructured and updated to reflect latest evidence on housing, employment and retail.	Outstanding Issues	To reflect latest evidence on housing, employment and retail. The SA scored the changes to this policy positively. There has been no change since submission to the hierarchy of development with Redhill being at the top of the development hierarchy.	

### CS7 Gatwick Airport

<b>Alternatives considered</b>	<b>Stage of preparation</b>	<b>Reasons for carrying forward / rejecting</b>	<b>SA/SEA conflicts</b>
Continue to support a one runway, two terminals airport at Gatwick.	I&O 2005	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.
T2. Continue to support a one runway, two terminals airport at, subject to satisfactory environmental safeguards being in place.	PO 2006	Carried forward to PO 2008 Option 21 Aviation	Not appraised as no change since I&O 2005 appraisal.
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.	PO 2008	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.

### CS8 Sustainable Development

Alternatives considered	Stage of preparation	Reasons for carrying forward / rejecting	SA/SEA conflicts
Require more environmentally responsible design and construction practices in the borough (waste, water, energy, air, adaptation to climate change etc.).	I&O 2005	Carried forward	Small conflict with viability.
<i>Do not</i> require more	I&O 2005	Rejected	Scored negatively

environmentally responsible design and construction practices in the Borough (waste, water, energy, air, adaptation to climate change etc.)			against the majority of SA objectives.
UD2. 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.	PO 2006	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 Policy Approach 2 Sustainable Development Principles	PO 2008	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 Policy	PO 2008	Carried forward into	The Preferred Option

Approach 7 Development, Protection of Character and Heritage and Urban Design	CS8, heritage in CS3 submission 2009	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 infrastructure to balance a policy of high density housing.
<b>Changes post submission 2009</b>		
<b>Change made</b>	<b>CS version</b>	<b>Why change was made</b>
Additional points were added to the policy relating to neighbourhoods, pollution and climate change.	Submission 2012	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).

<b>CS9 Sustainable Construction</b>			
<b>Alternatives considered</b>	<b>Stage of preparation</b>	<b>Reasons for carrying forward / rejecting</b>	<b>SA/SEA conflicts</b>
Require commercial and residential developments to provide a set proportion of their energy requirements by on-site renewable resources (solar panels, wind turbines etc).	I&O 2005	Carried forward to PO	None. 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.
<i>Do not</i> require commercial and residential developments to provide a set proportion of their energy requirements by on-site renewable resources.	I&O 2005	Rejected	Scored negatively against a number of SA objectives.
Support and encourage the development of both waste recycling and renewable energy technologies in	I&O 2005	Carried forward to Preferred Options	This option scored positively, with additional comments regarding the use of organic waste as energy.

appropriate locations in the borough.		
Preferred policy approach 6 Sustainable construction	PO 2008	Carried forward with minor changes to Submission 2009.
<b>Changes post submission 2009</b>		
<b>Change made</b>	<b>CS version</b>	<b>Why change was made</b>
Updated to reflect current building regulations requirements	Submission 2012	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.

<b>CS10 Infrastructure</b>			
<b>Alternatives considered</b>	<b>Stage of preparation</b>	<b>Reasons for carrying forward / rejecting</b>	<b>SA/SEA conflicts</b>
In areas in need of important community facilities and services consider the provision of facilities on urban open spaces surplus to requirements	I&O 2005	Provision of facilities on Urban Open Land has been rejected	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.
Do not, in areas in need of important community facilities and services, consider the provision of facilities on urban open spaces surplus to requirements.	I&O 2005	Carried forward to PO	Green space may benefit social well being as much as community facilities.
H2. '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.	PO 2006	Carried forward to PO 2008	The Sustainability Appraisal concluded that it was appropriate to require contributions to meet the needs of new developments.
CF1. Encourage proposals that would increase the range or	PO 2006	Carried forward to Submission 2009	Potential conflict was identified between the necessary

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.			requirements of new infrastructure and constraints posed by the existing fabric/character assessments
CF2. 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.	PO 2006	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.
CF3. Secure contributions from new development (both big and small) towards the infrastructure required to meet the needs created by new development.	PO 2006	Carried forward to Submission 2009	The Sustainability Appraisal concluded that it was appropriate to require contributions to meet the needs of new developments.
CF4. 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.	PO 2006	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 Policy Approach 3 Plan Monitor Manage Option Sustainable levels, locations and forms of development will be delivered at a rate which reflects the	PO 2008	Carried forward to Submission 2009	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

adequacy of infrastructure and services to meet the needs of the development or alongside the ability to provide new or upgraded infrastructure. Develop an SPD on infrastructure contributions.			change could be incorporated.
Preferred Policy Approach 16 Community Facilities and Infrastructure	PO 2008	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.	The preferred approach is in line with the Issues and Options and Preferred Options sustainability appraisal objectives.
<b>Changes post submission 2009</b>			
<b>Change made</b>	<b>CS version</b>	<b>Why change was made</b>	
None since Submission 2009	-	-	

<b>CS11 Housing delivery</b>			
<b>Alternatives considered</b>	<b>Stage of preparation</b>	<b>Reasons for carrying forward / rejecting</b>	<b>SA/SEA conflicts</b>
Preferred Policy Approach 11 Housing Delivery. To deliver numbers as put forward by SE plan panel report August 2007 (New Growth Point status)	PO 2008	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. SE plan figure changed – not carried forward for this reason.	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.
Housing figure of	Submission 2009	Housing delivery	SA commented that

9,240 put forward in draft SE plan		figure in line with regional strategy.	sustainability issues arising from increased level of housing development could be addressed through design.
<b>Changes post submission 2009</b>			
<b>Change made</b>	<b>CS version</b>	<b>Why change was made</b>	
Housing figure of 10,000 and 12,500 tested post submission	Suggested Modifications to the Inspector	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.	
Range of housing delivery tested from 300pa to 980pa	Outstanding Issues	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. The highest positive score was around the 500pa mark.	

### CS12 Housing needs of the community

<b>Alternatives considered</b>	<b>Stage of preparation</b>	<b>Reasons for carrying forward / rejecting</b>	<b>SA/SEA conflicts</b>
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.	I&O 2005	Building in Green belt not supported by consultation at this stage.	Potential conflicts identified with flooding, accessibility, light pollution, noise, biodiversity, congestion and the need to travel.
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.	I&O 2005	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	I&O 2005	Carried forward in combination with other options	Scored similarly to option above

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.				
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.	I&O 2005		Carried forward in combination with other options	As above
H3. 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.	PO 2006		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 Policy Approach 13 Providing the Appropriate Type and Housing Mix	PO 2008		Carried forward to submission 2009	The Sustainability Appraisal concluded that it was appropriate to seek to meet housing needs.
<b>Changes post submission 2009</b>				
<b>Change made</b>	<b>CS version</b>		<b>Why change was made</b>	
None since Submission 2009	-		-	

<b>CS13 Affordable Housing</b>				
<b>Alternatives considered</b>	<b>Stage of preparation</b>		<b>Reasons for carrying forward / rejecting</b>	<b>SA/SEA conflicts</b>
Lower the threshold size at which new housing developments are required to provide affordable housing.	I&O 2005		Carried forward	None
<i>Do not</i> lower the threshold size at which new housing developments are required to provide affordable housing.	I&O 2005		Rejected	In the longer term supply of larger sites may be reduced and therefore limited affordable housing will be delivered.
Increase the	I&O 2005		Carried forward	Option increases the

percentage of affordable housing required on new housing developments that trigger the threshold.				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.
<i>Do not</i> increase the percentage of affordable housing required on new housing developments that trigger the threshold.	I&O 2005	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.	I&O 2005	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.	I&O 2005	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.	I&O 2005	Rejected		Conflicts with levels of employment, local employment opportunities, and commercial development.
<i>Do not</i> provide affordable housing on employment sites as an exception to current policy	I&O 2005	Carried forward to support draft objective 4 (PO 2006)		Provision of affordable housing.
H4. Include an affordable housing policy that requires:  All new housing developments comprising 15 dwellings or more to	PO 2006	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

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.			regarding potential conflict between the needs of residents (e.g. mobility; climate change adaptation) and the character of an area/local distinctiveness.
H5. Set out an appropriate mix of affordable housing to be provided as social rented, affordable home ownership and / or intermediate rented accommodation.	PO 2006	Taken forward to PO 2008	As H4 above
Preferred Policy Approach 15 Affordable housing 15 dwellings or more to provide at least 40 per cent of housing as affordable;	PO 2008	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. This preferred approach is in line with the Issues and Options sustainability appraisal recommendations.
<b>Changes post submission 2009</b>			
<b>Change made</b>	<b>CS version</b>	<b>Why change was made</b>	
30% affordable housing on sites of 15 or more	Submission 2012	The % of affordable housing was lowered to 30% due to political decision making. In response to this SA at this stage led to changes to the supporting text of CS13 to clarify that the Council will seek to maximise affordable housing provision on urban extension sites.	

<b>Alternatives considered</b>	<b>Stage of preparation</b>	<b>Reasons for carrying forward / rejecting</b>	<b>SA/SEA conflicts</b>
H6. Include policies for those groups with special 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.	PO 2006	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. Carried forward.	Not appraised at this stage. The East Surrey authorities considered two options for the distribution of additional pitches.
Preferred Policy Approach 14 Gypsies and Travellers and Travelling Showmen	PO 2008	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.
<b>Changes post submission 2009</b>			
<b>Change made</b>	<b>CS version</b>	<b>Why change was made</b>	
The policy was rewritten to include locally arising needs, sequential approach to allocation, suitability criteria for allocation and safeguarding sites from development unless no longer required.	Schedule A & B changes	Ineffectiveness and conflict with national policy regarding provision for gypsies and travellers. The SA scored positively against a number of objectives for the rewritten policy.	

<b>CS15 Travel options and accessibility</b>			
<b>Alternatives considered</b>	<b>Stage of preparation</b>	<b>Reasons for carrying forward / rejecting</b>	<b>SA/SEA conflicts</b>
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,	I&O 2005	Carried forward	None identified

car sharing schemes and less car parking.				
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.	I&O 2005	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.	
T3. 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.	PO 2006		As above and additional comments were made concerning the risk of climate change impacting on transport infrastructure is high	
Support initiatives to increase the capacity and quality of road and rail infrastructure in the borough.	I&O 2005	Carried forward	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.	I&O 2005	Carried forward	No conflicts identified at this strategic level	
T1...More specifically, the Council will work with relevant agencies to: Secure an extension to the 'Fastway' bus-based public transport system	PO 2006	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	

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 public transport improvements to town and village centre parking strategies.

T4. 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

PO 2006

Carried forward in part to submission 2009 CS16

The preferred approach is in line with government and regional guidance and with sustainability appraisal recommendations.

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.

Preferred Approach Accessibility	Policy 19	PO 2008	Carried forward to policy CS17 (Submission 2009)	
Preferred Approach 20 Parking	Policy	PO 2008	Carried forward to policy CS18 (Submission 2009)	SA raised the issue that its attraction to some residents could create a vicious circle of more dispersed development and consequently more car-dependence.

**Changes post submission 2009**

Change made	CS version	Why change was made
Policies amalgamated CS16 (travel options), CS17 (accessibility) and CS18 (Parking)	CS18 deleted in Suggested Modifications to the Inspector, CS16/17 in Submission 2012	Supporting text and policy restructured for clarity and to reflect latest evidence. SA was not revised.

**APPENDIX H Table showing recommendations and how they were addressed.**

Stage	Issue	Recommendation	Where this was addressed	Policy
<b>Issues and Options Oct 2005</b>	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. CS2 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)	CS2 and CS4
	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	CS13
	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.	CS13
	Affordable Housing	A policy that will deliver	Policy CS13 sets the affordable housing	CS1

	delivery	sufficient quantity of affordable housing.	requirements.	
	Landscape areas	Continue to protect ecological, historical and aesthetically important areas	Carried through to Preferred Options.	
	Community Facilities	The phrase “surplus to requirements” needs to be better understood relative to the wider sustainability.	CS10 resists the loss of community facilities unless it can be demonstrated that such a need no longer exists.	CS10
	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
<b>Preferred Options 2006</b>	Air quality	Further opportunities to reduce car-use in urban areas (e.g. appropriate car-reduced/car free housing; car clubs) could be investigated as policy options.	CS15 Travel options and Accessibility address reducing the need to travel and facilitating sustainable transport choices.	CS15
	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	CS8 (3) refers to designing for neighbourhoods which are safe and secure. CS8 (8) includes reference to noise and light pollution.	CS8 and DMP

	public areas will need to be carefully designed.		
Water quality	There are no measures advocated to reduce the risk of pollution into the Borough's rivers/watercourses.	CS8 (8) Developments must be designed to minimise pollution and safeguard water quality.	CS8 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.	CS1 commits to promote, enhance and manage a multi-functional green infrastructure network across the borough. CS1 aims to protect and enhance urban green space that contributes to the GI network. CS2 asks that development proposals will protect and enhance existing areas of biodiversity value. CS10 aims to secure GI in line with GI strategy to include provision of new open space.	CS1, CS2 and CS10
	Needs further policy development relating to criteria-based policy for standalone renewable energy technology/CHP infrastructure	CS10 the council will encourage and promote the development of decentralised energy networks.	CS10 and DMP
	Local distinctiveness can be a significant barrier to the challenges of climate change in particular.	Local distinctiveness is covered by CS2. Policy CS9 ask for new development to be designed to meet CSH4 or higher, and BREEAM 'very good' (including extensions). CS8 asks that development should contribute to a reduction in carbon emissions.	CS2, CS8, CS9 and DMP
Vitality/ car use	An unhealthy conflict exists	Redhill Town Centre was chosen as a centre	RAAP

	conflict	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.	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.	
<b>Preferred Options 2008</b>	Green Infrastructure	Consideration should be given to the use of criteria in policy to ensure: quality of urban open 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.	Green Infrastructure in CS1 and CS2. Resist loss of open spaces - CS10, and provision of new open space and improvements to existing open space through CS10. Protection of SAC through CS1 and mitigation put forward in HRA, Green roofs alluded to in CS8 point 9 (design reflecting need to adapt to impacts of climate change) more detail in DMP, also design for urban heat environment (CS8 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 (CS10).	CS1, CS2, CS8, CS9, CS10 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	Affordable housing policy CS13, Infrastructure/ contributions - policy CS10. CSH required in CS9. CS8 refers to minimising noise and light pollution. Adaptation to climate change is addressed through policy CS8. Detail will be	CS8, CS9, CS10 and CS13

	<p>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.</p>	addressed in DMP.	
Energy	<p>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</p>	<p>More detailed design advice will be in the DMP and design and parking SPD; BREEAM, CSH and CHP in CS9.</p>	CS9 and DMP

		and CHP.		
	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 CS8 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 for Redhill.	CS8, DMP and RAAP
	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 CS6, town centres and smart growth addressed in policy CS5 and CS3.	CS3, CS5 and CS6
	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 CS8 point 6. CS15 travel options and accessibility.	CS8 and CS15
<b>Submission Nov 2008</b>	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 CS8. They will be addressed in further detail in DMP and Design and Parking SPD.	CS8 and DMP
	Green Infrastructure	Issues were raised to be addressed in the Green Infrastructure Strategy including ways of addressing air quality	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

		issues and climate change consequences e.g. by SuDS		
	Housing / employment land	An issue was raised regarding a potential conflict between housing and employment land.	The figures in CS6 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.	CS6
<b>Revised SAR July 2009</b>	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.	CS8 (4) 'protect and enhance the green fabric'. CS10 aims to secure GI in line with GI strategy to include provision of new open space. Green infrastructure is also addressed throughout the RAAP/ This appraisal was carried out on the SE plan requirements, which changed over time. This comment referred to the higher level of development.	CS8, CS10 and RAAP
	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 to combat flash flooding in ALL new development.	CS8 (4) 'protect and enhance the green fabric'. CS10 aims to secure GI in line with GI strategy to include provision of new open space. CS8 (10) addresses flood risk and covers all sources of flooding and managing flood risk in all new development. Green infrastructure is also addressed throughout the RAAP.	CS8, CS10 and RAAP

	CS7 (a) – Redhill, commit to Green Action Zone.		
Water Quality & Quantity	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 to combat flash flooding in ALL new development. CS7 (a) – Redhill, commit to Green Action Zone.	CS8 (4) ‘protect and enhance the green fabric’. CS10 aims to secure GI in line with GI strategy to include provision of new open space. CS8 (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.	CS8, CS10 and 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.	CS8 (4) ‘protect and enhance the green fabric’. CS10 aims to secure GI in line with GI strategy to include provision of new open space. Green infrastructure is also addressed throughout the RAAP.	CS8, CS10 and RAAP
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.	CS8 (4) ‘protect and enhance the green fabric’. CS10 aims to secure GI in line with GI strategy to include provision of new open space. CS1 protection and enhancement of SAC, SSSIs, LNRs, SNCIs and urban green spaces.	CS1, CS8 and CS10
Congestion	CS16 (now CS15) – strengthen	This is addressed through CS10 and CIL	CS10

		wording to reflect tariff contributions for transport investment. Monitoring success of travel plans.		
	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).	CS10
	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.	CS2 point e added to include protection and enhancement of historic environment and to ensure design reflects local heritage.	CS2
<b>Schedule A &amp; B July 2010</b>	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 draft 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.	CS4
<b>Outstanding Issues Sep 2011</b>	Green Belt	Any Green Belt boundary review would be appraised through the	Wording in policy CS4 is clear as to the hierarchy of development land.	CS4

		DMP. Alternative sites for release would need to undergo SA, wording of policy should trigger GB release only once PDL is saturated.		
	Green Infrastructure	A GI Strategy must be in place to inform SA of alternative areas for a potential urban extension.	GI Strategy required in CS10	CS10
	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 aims to protect and enhance existing areas, CS10 commits to secure GI in line with what is set out in the GI Strategy.	CS2 and CS10
<b>Submission SA Feb 2012</b>	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 to para 7.6.5	CS13
	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	All changes made as recommended.	CS8

CS8 making links between policy criteria and the assessment of potential urban extension sites.

