



Development Management Plan

**Sustainability Appraisal Post-Adoption
Statement (incorporating Habitats
Regulations Assessment Statement)**

September 2019

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1. Introduction (incorporating HRA Statement)

- 1.1 On 9th July 2019, the government appointed Planning Inspector issued her final Report, which concludes that the Reigate & Banstead Development Management Plan (DMP) is legally compliant and “sound”, subject to a number of main modifications being made.
- 1.2 This Sustainability Appraisal (SA) Post-adoption Statement explains how the process of sustainability appraisal (incorporating Strategic Environmental Assessment (SEA)) has influenced the development of the DMP, in compliance with the following:
- Regulation 26 of the Town and Country Planning (Local Planning)(England) Regulations 2012 (as amended)
 - Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004
 - Paragraph 165 (paragraph 32 of the 2019) of the National Planning Policy Framework 2012; (and associated Planning Practice Guidance)

Sustainability Appraisal and Strategic Environmental Assessment

- 1.3 Development plans must be prepared “with the objective of contributing to sustainable development”¹. Specifically, sustainability appraisal (SA) is a legal requirement² and an integral part of the plan-making process for statutory development plans. The role of the SA is to promote sustainable development by assessing the extent to which the emerging plan policies, when judged against reasonable alternatives, will help to achieve the environmental, economic and social objectives of the SA framework. In doing so, it provides evidence to enable informed choices to be made with a view to maximising the benefits of sustainable development and avoiding, or at least minimising, the potential for adverse effects through mitigation. Sustainability appraisal is to be undertaken iteratively at key stages in the preparation of the DMP informing the evolution of its policies and proposals.
- 1.4 In addition to SA, town planning and land use plans such as the DMP are required to be subject to an “environmental assessment” in accordance with *The Environmental Assessment of Plans and Programmes Regulations 2004* (Statutory Instrument 2004 No.1633), known as the Strategic Environmental Assessment “*SEA Regulations*”.³ The requirements of the SEA Regulations include preparation of an environmental report, and arrangements for monitoring of any significant environmental effects.
- 1.5 As set out in the PPG⁴ sustainability appraisals which consider the plan’s potential economic, social and environmental impacts incorporate the requirements of the 2004 SEA Regulations, in an integrated appraisal process. At the various stages, the

¹ Section 39 of the Planning and Compulsory Purchase Act (PCPA) 2004

² Section 19 of the Planning and Compulsory Purchase Act (PCPA) 2004

³ The SEA Regulations 2004 implement European Directive 2001/42/EC “*on the assessment of the effects of certain plans and programmes on the environment* (known as “*the SEA Directive*”)

⁴ PPG “Strategic environmental assessment and sustainability appraisal” Paragraph: 001 Reference ID: 11-00120190722

outputs from the SA and SEA processes are covered in a single report. As the sustainability appraisal meets all of the requirements of the SEA Regulations 2004, a separate strategic environmental assessment should not be required⁵.

- 1.6 Regulation 26 of the *Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)* requires a sustainability appraisal report (produced in accordance with section 19(5) of the Planning and Compulsory Purchase Act (2004)), to be made available as soon as reasonably practicable after the local planning authority adopt a local plan.
- 1.7 Regulation 16(4) of the 2004 *the SEA Regulations* requires that, as soon as reasonably practicable after the adoption of a plan for which SEA has been carried out, the responsible authority must shall makes available, alongside the adopted plan, a statement summarising :
- how environmental considerations have been integrated into the plan or programme;
 - how the environmental report (prepared pursuant to Article 5) has been taken into account;
 - how the opinions expressed (pursuant to Article 6) and the results of consultations entered into (pursuant to Article 7) have been taken into account (in accordance with Article 8);
 - the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
 - the measures to be taken to monitor the significant environmental effects of the implementation of the plan (in accordance with Article 10).
- 1.8 This Statement satisfies both of these requirements and demonstrates that the requirements of the SEA Regulations have been met and that a robust process of sustainability appraisal of the DMP has been progressed throughout preparation of the plan.

Habitats Regulations Assessment

- 1.9 In addition to SA and SEA, the DMP was also subject to Habitats Regulations Assessment (HRA) at key stages through the plan making process. The final HRA Report consists of:
- **Habitats Regulations Assessment Screening and Appropriate Assessment** (October 2017, Updated September 2018)
http://www.reigate-banstead.gov.uk/downloads/download/1705/cd4a_habitats_regulations_assessment_updated_16102018
 - **Habitats Regulations Assessment and Appropriate Assessment Addendum** (March 2019)
http://www.reigate-banstead.gov.uk/download/downloads/id/5371/rbbc-dmp-011_hra_addendum.pdf

⁵ PPG “Strategic environmental assessment and sustainability appraisal” Paragraph 007 Reference ID: 11-007-20140306

1.10 The HRA concludes that the DMP will not result in any significant or adverse effects on Natura 2000 sites within the scope of the HRA/AA⁶.

1.11 A Statement of Common Ground (SoCG) was produced with Natural England through the DMP examination. This SoCG captured that there were no outstanding areas of disagreement between the parties and specifically that both were in agreement that:

- a) Through an ecological traffic modelling report, the HRA fully assesses the in-combination effect of air quality at designated sites in compliance with relevant case law and there will be no adverse effects on European sites in relation to air quality
- b) All of the DMP objectives, policies and allocations were re-screened and comply with the *Sweetman judgement*
- c) The HRA is legally sound

1.12 A HRA/AA Addendum was prepared to consider and accompany the public consultation on main modifications. This concluded that the main modifications would not alter the conclusions of the previous HRA/AA. No objections or comments were received to the Addendum during the consultation.

1.13 The Council is therefore satisfied that the Development Management Plan meets the requirements of the Conservation of Habitats and Species Regulations 2017.

⁶ This includes the Mole Gap to Reigate Escarpment Special Area of Conservation (SAC), the Ashdown Forest SAC and Special Protection Area (SPA), the Thames Basin Heaths SPA, South West London Water Bodies SPA and Ramsar site, Richmond Park SAC and Wimbledon Common SAC.

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

Interaction with Core Strategy

- 2.1 The purpose of the DMP is to deliver the objectives and policies of the strategic, “part 1” development plan, the Core Strategy, which was adopted in July 2014. The Core Strategy sets out the strategic development policies for the borough. In accordance with the Local Planning Regulations⁷, as a later adopted development plan, DMP policies are required to be consistent with Core Strategy policies, unless they are intended to supersede them (such as with DMP Policy DES superseding Policy CS15).
- 2.2 The Core Strategy includes a number of strategic objectives directly related to sustainability, including SO1, SO2, SO10, SO14 and SO19. As the DMP objectives and policies seek to deliver the objectives of the Core Strategy, sustainability and sustainability considerations are therefore inherent within it. The various sections of the DMP identify the overlaps between its policies and objectives, and those within the “higher order” Core Strategy.

The DMP Sustainability Appraisal stages

- 2.3 As outlined in Section 1 above, the Council is legally required to prepare a Sustainability Appraisal (SA), incorporating Strategic Environmental Assessment (SEA) alongside, and informing, the process of preparing the Development Management Plan (DMP). An iterative SA process has been integral to the production of the DMP. This has included the preparation of a series of SA Reports throughout the process, which have informed the evolution of the DMP, as set out below:

Table 1: Integration of the Sustainability Appraisal into plan making

Dates	Plan Making Stage	SA/SEA Stage
September 2012; Revised 2013	Early stages of DMP preparation	SA/SEA Scoping Report 2012
http://www.reigate-banstead.gov.uk/info/20088/planning_policy/22/evidence_and_research_for_planning_policies/9		
June 2016	Development Management Plan (Regulation 18)	Sustainability Appraisal Main Report, including non-technical summary
http://www.reigate-banstead.gov.uk/info/20381/emerging_planning_policy/761/dmp_-_evidence		
June 2017		SA/SEA updated Scoping Report

⁷ Regulation 8

http://www.reigate-banstead.gov.uk/downloads/file/3423/sa_scoping_report_june_2017pdf		
October 2017, updated May 2018	Development Management Plan (Regulation 19)	Sustainability Appraisal
http://www.reigate-banstead.gov.uk/downloads/file/4654/cd3_-_regulation_19_sustainability_appraisal		
November 2018	DMP Examination RBBC-DMP-005: Council's response to Hearing Actions with Appendices; Action 5.6 and Appendix 5	SA Position Statement for Sites SSW9 and SSW10
http://www.reigate-banstead.gov.uk/info/20381/emerging_planning_policy/888/development_management_plan		
March 2019	DMP Examination RBBC-DMP-010	SA Addendum of the Inspector's proposed Main Modifications to the Development Management Plan
http://www.reigate-banstead.gov.uk/downloads/file/5344/rbbc-dmp-010_sustainability_appraisal_addendum		

Scoping the SA

- 2.4 The 2012 SA Scoping Report (revised in 2013), which was used to appraise the sustainability of the Core Strategy was also used to inform the preparation of the Regulation 18 stage of the DMP's preparation. This ensured consistency in the sustainability objectives applied to both documents.
- 2.5 In accordance with the relevant legislation, the 2012 SA Scoping Report identifies plans, programmes and policies relevant to the area and to preparation of the area's development plan. The Scoping Report also includes relevant baseline data about the environmental, economic and social characteristics of the area, and identifies key sustainability issues and problems. The 2012 SA Scoping Report (pages 8 and 9) identified 19 sustainability objectives (which were slightly revised in 2013).
- 2.6 The East Surrey sustainability objectives were reviewed and revised in April 2015 by an East Surrey Officers Working Group. Detail of the 2015 Review of the East Surrey SA Objectives is set out in Appendix C of the updated SA Scoping Report 2017.
- 2.7 Following the Regulation 18 DMP consultation, the SA Scoping Report was fully reviewed, and an updated SA Scoping Report was published in June 2017. At that stage, the baseline data and the review of plans, programmes and policies were updated. The revised East Surrey sustainability objectives were also reflected in this 2017 updated SA Scoping Report, in which the objectives were reduced to 16 through small amendments and merging of similar objectives, however the core principles remain unchanged.
- 2.8 The SA Scoping Report (updated 2017) informed the assessment of the draft

Regulation 19 DMP, and the subsequent appraisal of main modifications of the submitted DMP.

- 2.9 Central to the SA process are the 16 sustainability objectives set out in the SA Scoping Report 2017. These were developed, refined and agreed through joint working between the five East Surrey authorities over a number of years, and through consultation with relevant statutory bodies and nearby local authorities. The objectives cover a broad range of social, economic and environmental matters and impacts.
- 2.10 By using SA objectives framework that was formulated and updated over the years across East Surrey authorities, this has allowed for continuity and cross-boundary alignment of SAs through the sub-region. Furthermore, by adopting similar objectives to those used to inform and develop the Core Strategy, a broadly comparable approach has been taken to the assessment of sustainability across the two related development plan documents.
- 2.11 Guiding questions relating to each SA objective were used to consider the potential impacts of the emerging policy options. The 16 SA objectives, together with their related guiding questions are set out in Section 5 of the SA Scoping Report June 2017, and provided at **Appendix A** of this SA Adoption Statement.

The Sustainability Appraisal stages

- 2.12 As the list of SA Reports provided in Table 1 demonstrates, the process of sustainability appraisal was carried out at each stage of the preparation of the DMP. Policies and site allocation options were assessed against the SA objectives, using the guiding questions identified in the SA Scoping.
- 2.13 The SA has contributed to plan development by providing an arms-length assessment of the sustainability of the Council's potential policy and site as they were developed. Use of the peer review and the statutory consultation process enabled objectivity and transparency in the appraisal process. In integrating the sustainability appraisal process into the development of the DMP, the recommendations from the appraisal process were able to inform the Plan from the initial to final stages of its production. The various SA Reports provide an audit trail of the appraisal process.
- 2.14 The principle of carrying out an SA Addendum report in response to, and to resolve, matters arising from the examination process is established through case law in the judgement in *Cogent Land LLP v Rochford District Council [2012] EWHC 2542*.
- 2.15 The SA Addendum (Feb 2019) of the Main Modifications proposed followed the same assessment and appraisal methodology as that described in the Regulation 19 SA Report (Oct 2018; updated May 2019) to ensure consistency between the two.

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

- 3.1 As summarised in Section 1 above, the sustainability appraisal of the DMP, incorporates the Environmental Assessment, and involves the assessment of the plan against a SA framework consisting of a series of sustainability objectives (including environmental objectives). This assessment help to determine whether there are likely to be significant environmental, social or economic effects of implementing that plan or policy.
- 3.2 The role of the Sustainability Appraisal is to inform the decision making process during the development of the plan, by providing information on likely sustainability effects. Whilst there is a statutory requirement to consider the results of the Sustainability Appraisal, there is no legal duty to select the most sustainable option as it is acknowledged that there are other factors to consider.
- 3.3 In respect of sustainable urban extensions site allocations, the *Sustainable Urban Extensions (Stage 2) Site Specific Technical Report* (June 2016) explains how the findings of the Sustainability Appraisal (incorporating SEA) have been drawn together with other evidence (for example constraints/opportunities analysis, Green Belt performance and flood risk/sequential test). This is explained at Task 2, with the assessment process in respect of individual sites summarised in Tables 7 and 8.
- 3.4 At each stage of sustainability appraisal of the DMP, the SA findings included measures to help to reduce, mitigate or avoid potential adverse effects and maximise beneficial effects of the plan. At each stage of preparation of the plan, the findings of the sustainability appraisal were taken into account to inform the development of policies and proposals.

4. How the opinions raised during consultation have been taken into account

- 4.1 Consultation is an important aspect of plan making generally, and of Sustainability Appraisal (SA) specifically. As set out in Section 2 above, there have been a number of stages of consultation relating to the DMP, and also specifically to the SA, including:

Scoping report

- 4.2 The scope of the SA was subject to consultation in July and September 2012 with the statutory “consultation bodies” and nearby authorities, in the form of the SA Scoping Report. A table setting out the responses received and how these were addressed in the SA framework is set out in **Appendix B** of this Statement.
- 4.3 A draft updated SA Scoping Report was sent to the three “consultation bodies” (Natural England, Historic England, and the Environment Agency) and to nearby local authorities, and Surrey County Council for their comment between December 2016 and January 2017. The draft Scoping Report was then amended to reflect the comments received, and the updated SA Scoping Report was published in June 2017. Section 6 of the 2017 SA Scoping Report summarises the responses received, and how the Scoping Report was amended to reflect this, and are also reproduced in **Appendix B** of this Statement.

Appraisal stages

- 4.4 A Sustainability Appraisal Report was published alongside the Regulation 18 DMP for public consultation in summer 2016. The *DMP Regulation 18 Consultation Statement*⁸ identifies the organisations that were consulted as part of this consultation, the responses received from them and the main issues raised during the consultation, including in relation to the SA. *Appendix C* of the *Regulation 18 Consultation Statement* summarises how these comments were taken into account in preparing the subsequent version of the Plan and in SA Report.
- 4.5 The *DMP Regulation 19 Publication Statement* (May 2018)⁹ was prepared to accompany the DMP submission, following pre-submission publication between January and May 2018. The main issues raised by respondents to the Regulation 19 DMP and the accompanying SA Report (Oct 2017), along with the Council’s response to these issues are set out in a table at *Appendix A* of the *Regulation 19 Publication Statement* (with comments specifically regarding the SA process and its findings between pages 540 and 556). The Council’s responses to responses received, clearly demonstrates that the points raised have been taken fully into account and, where relevant, appropriate adjustments made to the DMP and final Sustainability Appraisal

⁸ Core Document CD20, available at: http://www.reigate-banstead.gov.uk/downloads/file/4296/consultation_statement_regulation_18

⁹ Core Document CD7, available at: http://www.reigate-banstead.gov.uk/download/downloads/id/4295/publication_statement_v2_11072018.pdf

(see the May 2018 update to the SA Report).

- 4.6 In November 2018, during the DMP Examination Hearings, a respondent raised a number of points relating to the appraisal and scoring within the Sustainability Appraisal for two specific sites (SSW9 and SSW10) which they were promoting.
- 4.7 The Council acknowledged that there are some factual errors in the Regulation 19 SA Report (October 2017; updated May 2018), and corrected them in its response to Hearing Actions (Appendix 5 of Document Ref: RBBC-DMP-005: Council's Responses to Hearing Actions with Appendices; 22 November 2018). However, these corrections were minor in nature and did not give rise to a substantive change to the scoring of either of these sites. Hence, they did not alter the conclusions reached as to whether the sites should (or should not) be allocated (taking account of the evidence base as a whole), nor the robustness of the Sustainability Appraisal process as a whole.¹⁰
- 4.8 An SA Addendum (RBBC-DMP-010) was published in March 2019 alongside public consultation on Main Modifications, which was carried out as part of the examination process. This concluded that there would be no significant negative effects against the SA objectives from the proposed main modifications and therefore the modifications did not significantly alter the findings of the Submission SA (CD3) in terms of delivering positive sustainability outcomes. All comments received during this consultation, including any specifically in relation to the SA Addendum, were provided to the Inspector for consideration and to inform drafting of the final Report.
- 4.9 The above summary and the various detailed documents referred to above clearly evidence and demonstrate how the opinions and comments received in relation to the SA/SEA of the DMP, including at scoping stage, have been considered, taken into account, and where necessary acted upon by the Council in the preparation of the DMP.

¹⁰ As set out in RBBC-DMP-005, the Council's decision not to carry forward SSW10 as an allocation was primarily due to its high contribution to the Green Belt (see Table 8 of Sustainable Urban Extension Technical Report; Stage 2 (June 2016)), which is unaffected by the factual corrections to the SA.

5. Reasons for choosing the Plan as adopted, in light of other alternatives considered

- 5.1 It is important to appreciate that the primary role of the DMP is to help to deliver the vision and objectives of the Core Strategy. The Core Strategy, adopted in 2014, sets out the overarching spatial strategy and broad scale and distribution of development. The DMP adds detail in the form of development management policies and site allocations and, in accordance with planning legislation, must have regard to the Core Strategy as the higher order development plan document¹¹.
- 5.2 The range of reasonable alternatives for the DMP with regard to development management policies and site allocations, were therefore limited by the need for consistency with the adopted development plan (the Core Strategy). Nevertheless, the SA did investigate in detail all reasonable alternatives within the scope and remit of the Core Strategy, and this has informed decision-making for the plan.
- 5.3 The DMP *Sustainability Appraisal Main Report* (June 2016) that informed the Regulation 18 DMP included an appraisal of potential reasonable alternative policy approaches and sites for allocation. Table 10 of this *SA Main Report 2016* provides a full list of the potential policy approaches that were considered for each issue / policy, as well as a “long list” of potential Sustainable Urban Extension sites (SUEs) located within the Core Strategy “Areas of Search” for sustainable urban extensions. Where relevant, this included a “do nothing” policy approach.
- 5.4 The full appraisals of each potential policy option considered (including the preferred option and those rejected) are provided at Appendix E of the 2016 SA Report. Appraisals of each of potential SUE site are provided at Appendix F; and the full appraisal of the each potential urban site option is provided at Appendix G. The full assessment of each reasonable option considered for a Strategic Employment Site is provided at Appendix H the *SA Main Report 2016*. These appraisals are summarised in Tables 4, 5, 6 and 7 of the *2016 SA Main Report* respectively.
- 5.5 As set out in the Regulation 18 *SA Main Report 2016* (paragraph 3.3.5), the findings of the sustainability appraisal of potential options for each policy approach identified a preferred approach, and / or rejection of a particular approach. The SA process also identified opportunities to avoid or to mitigate potential negative sustainability impacts. This enabled emerging policies to be amended to ensure the DMP’s sustainability was enhanced.
- 5.6 In addition, further explanation of the reasons for selecting the chosen options vis a vis sustainable urban extensions is set out in the *Sustainable Urban Extensions (Stage 2) Site Specific Technical Report* (June 2016). Tables 7 and 8 in particular explicitly draw together the findings of Sustainability Appraisal with other relevant planning considerations and evidence in order to form conclusions and reasons for shortlisting and selecting the chosen allocations.

¹¹ Regulation 19(2) of the Planning and Compulsory Purchase Act 2004

5.7 The policies and sites included in the adopted DMP were selected mainly because they progress and support delivery of the vision, objectives and policies set out in the Core Strategy, whilst achieving the most benefits and least negative effects for sustainable development.

6. Measures to be taken to monitor the significant effects of the implementation of the plan

- 6.1 Article 10 of the SEA Directive requires the monitoring of the significant environmental effects of the implementation of the plan in order to identify any unforeseen adverse effects at an early stage, and to be able to undertake appropriate remedial action. It allows for existing monitoring arrangements to be used if appropriate, with a view to avoiding duplication of monitoring from establishing monitoring arrangements specifically for the subject plan. Details of monitoring arrangements must be included in the sustainability appraisal report, the SA post-adoption statement or in the Local Plan.
- 6.2 The DMP delivers the overarching development vision, objectives and strategy of the Core Strategy. As such, there is significant overlap between the monitoring of implementation of the DMP and the existing comprehensive monitoring framework which was developed for the Core Strategy¹². Baseline contextual indicators and policy specific performance data is reported annually through the Council's suite of topic focused monitoring reports, and then subsequently drawn together in the Annual Monitoring Report, all of which are available on the Council's website.¹³ The Council's regular reporting includes:
- Commercial development monitor: covering the characteristics of employment, business and retail development and local property market data (including vacancy).
 - Environment and sustainability monitor: covering the condition of, and impact of development upon, areas of nature conservation, landscape, flood risk and heritage; the environmental performance of new buildings and wider environmental issues such as air pollution (including within Air Quality Management Areas)
 - Housing delivery monitor: covering housing supply and delivery, including affordable housing.
 - Industrial estates monitor: covering the occupancy, vacancy and performance of designated employment areas within the borough
 - Town and local centres monitor: covering the occupancy, vacancy and performance of designated town and local centres within the borough
- 6.3 As set out in Section 6 of the *Regulation 19 SA Report* (updated May 2018) accompanying the DMP, there is therefore an existing, well-developed and long-established programme of monitoring activity and reporting against which the effects of implementation of the DMP can be examined.
- 6.4 Table 14 of the *Regulation 18 SA Report* (June 2016) for DMP provides a matrix explaining how the various monitoring indicators and data contained within the Core Strategy Monitoring Framework (and therefore within the Council's monitoring reports) link to and address the SA objectives and the potential sustainability issues identified

¹² Available at: http://www.reigate-banstead.gov.uk/downloads/download/26/core_strategy_monitoring_framework

¹³ These are available at: http://www.reigate-banstead.gov.uk/info/20280/plan_monitoring

within the SA Report and previous Scoping activities.

6.5 Section 6 of the *Regulation 19 SA Report* (updated May 2018) identifies a number of specific issues which are relevant to monitoring of the DMP. The vast majority of these are already addressed within the existing Monitoring Framework; however, in some cases, new or additional data will be sourced. This is summarised below:

Issue	Comment
Affordable housing provision	Covered by contextual data H2 and performance indicator 54 in the CS Monitoring Framework
Accessible housing provision	New data to be collected and reported through Council's Housing Monitor on the number and type of accessible/adaptable homes delivered
Amount of development on previously developed land	Covered by performance indicators 37 and 38 in the CS Monitoring Framework
Amount of development on greenfield land	Ditto above plus indicators 10 and 11
Transport modal usage	Covered by contextual data T3 and T4 and performance indicators 64 to 68 in the CS Monitoring Framework
Number of trips per day at morning and evening peaks on the strategic road network	New data to be collected and reported through Council's Environment and Sustainability Monitor (timing and frequency subject to data availability from third parties).
Carbon dioxide emissions	Covered by contextual data E6 and T1 and performance indicators 42 to 44 in the CS Monitoring Framework.
Renewable energy generated	Covered by performance indicator 41 in the CS Monitoring Framework
Energy efficiency of new build housing	Overlapped with carbon dioxide emissions and renewable energy as above
Water efficiency of new build housing	The requirement in DMP Policy CCF1 applies to all new housing development. No specific monitoring required.
Monitoring of air quality	Covered by contextual data E8
Quality of biodiversity sites	Covered by contextual data E2 and E3 and performance indicators 4, 6 and 8
Water quality	Covered by performance indicator 40
Access to open or green space	Covered by contextual data E1 and performance indicator 49
Access to sport, leisure, and recreation opportunities	Ditto above
Available school places compared to need for school places	Covered by performance indicators 22 and 48
Waiting times for GP appointments	New data to be collected and reported through Council's Environment and Sustainability Monitor (timing and frequency subject to data availability from third parties).
Vacancies in town and local centres	Covered by contextual data R1 and R2
Vacancies in employment areas	Covered by contextual data R6

6.6 Additionally, from adoption of the DMP, the 5-year supply of gypsy and traveller pitches and travelling show people's plots, relative to the targets set in DMP Policy GTT1, will be monitored. This is in accordance with performance indicators 62 and 63 of the Core Strategy Monitoring Framework. This can now be undertaken as the DMP establishes a target for gypsy and traveller pitch/plot requirements against which delivery can be reviewed.

7. Conclusions

- 7.1 The Development Management Plan (DMP) includes the detailed policies and site allocation that will help to deliver the strategic part of the borough's development plan, the Core Strategy 2014. Together, these two development plans provide the statutory framework for delivering and managing development to 2027. The sustainability appraisal (SA) framework for both development plans is necessarily linked.
- 7.2 This SA post-adoption statement demonstrates that a robust process of sustainability appraisal (incorporating the strategic environmental assessment requirements) has been applied throughout the process of preparing the Development Management Plan, and has informed its development.
- 7.3 To inform the preparation of the Plan, an Appropriate Assessment under the Habitats Regulation Assessment has also been undertaken to assess the impacts of the Plan on the Natura 2000 network of internationally important nature conservation sites.
- 7.4 In including policies designed so that development and use of land in the borough contributes to the mitigation of, and adaptation to, climate change, the Council has complied with the relevant legal requirements concerning climate change.
- 7.5 The Inspector's Report on the DMP (paragraphs 217 and 218) confirms that the sustainability appraisal carried out by the Council is adequate, and the plan is compliant with legal requirements, including with regard to sustainability appraisal. The Inspectors Report also confirms that the final Habitats Regulations / Appropriate Assessment Report (and two interim HRA Reports) concludes that subject to mitigation measures in the plan, no significant adverse effects on the integrity of European sites are likely. The national public body and government advisor for the natural environment, Natural England, agrees with this finding.

Appendix A The SA Framework: Objectives and Guiding Questions

Source: SA Scoping Report June 2017

Number	Objective	Guiding Questions – Will The Option:
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"> • Boost the supply of housing? • Promote improvements in the availability and quality of the housing stock? • Help provide a supply of affordable homes to meet identified needs? • Help to reduce the number of homeless people in the borough? • Increase the amount of extra-care or enhanced sheltered accommodation? • Provide for the needs of gypsies, travellers, and travelling showpeople? • Provide options for self-build provision in the borough? • Have a significant detrimental effect on the financial viability of delivering future housing?
2	To facilitate the improved health and wellbeing of the whole population	<ul style="list-style-type: none"> • Help to improve the health of the community? • Improve access to health provision? • Encourage healthy lifestyles? • Enhance access to greenspace? • Help people to remain independent and provide assistance to single parents, the elderly, those with ill health or disability? • Reduce crime and fear of crime? • Help overcome social exclusion? • Help address the issues of deprivation and poverty?
3	To conserve and enhance archaeological, historic, and cultural assets and their setting	<ul style="list-style-type: none"> • Protect and/or enhance the historic and cultural assets of the borough? • Protect registered parks and gardens? • Preserve or enhance the character or appearance of conservation areas and their settings? • Improve access to the authority's cultural assets? • Promote sensitive re-use of important buildings where appropriate?

4	To reduce the need to travel, encourage sustainable transport options and improve accessibility to all services and facilities	<ul style="list-style-type: none"> • Reduce the need to travel, especially by private motorised vehicles? • Provide charging infrastructure for electric vehicles? • Reduce congestion or minimise unavoidable increases in congestion? • Reduce the need for car ownership? • Help provide safe walking/cycling/public transport infrastructure, including choice and interchange? • Be accommodated within the existing public transport constraints? • Reduce the need for road freight? • Improve access to the countryside, natural urban greenspace, and historic environments? • Improve access to key services (education, employment, recreation, health, community services, and cultural assets)?
5	To make the best use of previously developed land and existing buildings	<ul style="list-style-type: none"> • Encourage reusing previously developed land provided it is not of high environmental value? • Encourage the re-use of existing buildings? • Ensure that development is making the best use of land?
6	To support economic growth which is inclusive, innovative, and sustainable	<ul style="list-style-type: none"> • Support sustainable growth and encourage the provision of a range of jobs that are accessible to residents? • Provide for, and support, the needs of businesses, including new or emerging sectors? • Facilitate flexible working practices? • Promote the viability, vitality, and competitiveness of town centres and encourage their commercial renewal? • Facilitate and encourage the building of a skilled local workforce? • Encourage mixed-use development?
7	To provide for employment opportunities to meet the needs of the local economy	<ul style="list-style-type: none"> • Provide for the needs of the economy, especially local businesses in both urban and rural areas? • Encourage diversity and quality of employment options? • Encourage rural diversification? • Have a significant detrimental effect on the financial viability of delivery of future employment development?
8	To reduce greenhouse gas emissions and move to a low carbon economy	<ul style="list-style-type: none"> • Reduce emissions? • Reduce the need for energy use? • Support decentralised energy generation? • Facilitate the generation/use of renewable energy?

9	To use natural resources prudently	<ul style="list-style-type: none"> • Encourage the use and supply of sustainable local products or services? • Help reduce the environmental impact of products and services? • Reduce the use of primary resources, or create markets for recycled materials? • Encourage the efficient use of mineral resources? • Positively impact on residents' lifestyle choices to encourage their prudent use of natural resources? • Promote re-use and recycling of materials? • Promote the efficient storage and collection of waste, and allow for waste to be managed close to where it arises? • Minimise the production of waste?
10	To adapt to the changing climate	<ul style="list-style-type: none"> • Help in protecting the community from the increased extremes of weather which are predicted to occur more often with climate change (heatwaves, drought, and flooding)? • Reduce the opportunities to adapt in the future?
11	To reduce flood risk	<ul style="list-style-type: none"> • Reduce the risk of fluvial, surface water, groundwater, and sewer flooding to existing and future development? • Steer development away from areas at risk of flooding? • Help to reduce the rate of run-off and encourage sustainable urban drainage systems? • Ensure that increased flooding extremes are understood and reduced as far as possible?
12	To improve the water quality of rivers and groundwater, and maintain an adequate supply of water	<ul style="list-style-type: none"> • Improve quality and maintain an adequate supply of water? • Reduce pollution of groundwater, watercourses, and rivers from run-off/point-sources? • Reduce the amount of nitrates/phosphates entering the water environment? • Reduce the demand for water? • Encourage water to be stored for re-use?
13	To reduce land contamination and safeguard soil quality and quantity	<ul style="list-style-type: none"> • Reduce the risk of land contamination and protect good quality soil? • Reduce the risk of creating further contamination? • Help to remediate contaminated sites and where possible carry this out on-site? • Prevent soil erosion?

		<ul style="list-style-type: none"> • Minimise the loss of best and most versatile agricultural land (grades 1-3a)?
14	To ensure air quality continues to improve and noise and light pollution are reduced	<ul style="list-style-type: none"> • Help improve air quality? • Support specific actions in designated AQMAs? • Reduce pollution from traffic? • Encourage the creation of tranquil areas? • Ensure that people are not exposed to greater levels of noise? • Help reduce light pollution?
15	To protect and enhance landscape character	<ul style="list-style-type: none"> • Protect and enhance the landscape character areas within the borough, including the AONB and AGLV? • Protect and enhance the borough's natural urban greenspace? • Protect significant views? • Protect the urban fringe? • Protect the open countryside?
16	To conserve and enhance biodiversity	<ul style="list-style-type: none"> • Prevent fragmentation, increase connectivity and create more habitats? • Secure enhancement in biodiversity in all new development? • Continue to protect formally designated areas of nature conservation, including the SAC? • Take account of the effects of climate change on biodiversity and increase ecosystem resilience where possible? • Adequately defend and enhance protected species? • Protect SSSIs?

Appendix B Responses to the SA Scoping Report 2012 consultation and how these were addressed

Consultee	Response	Officer comment	Change to SR
Thames Water	The list of sustainability objectives should therefore make reference to the provision of water and sewerage infrastructure to service development. In relation to redevelopment it is essential that capacity exists to serve any net increase in demand as a result of the development. Where new infrastructure is required it is essential that this is in place ahead of development. This is essential to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low pressure water supply problems. It is also important that the satisfactory provision of water and sewerage infrastructure forms and integral part of the sustainability appraisal.	Agreed.	DAQ added to p114. Additional para added to p110.
Thames Water	The water companies' investment programmes are based on a 5 year cycle known as the Asset Management Plan (AMP) process. We are currently in the AMP5 period which runs from 1 st April 2010 to 31 st March 2015 and does not therefore cover the whole LDF period. AMP6 will cover the period from 1 st April 2015 to 31 st March 2020 and our draft Business Plan for AMP6 will be submitted to Ofwat in August 2013.	Agreed. This is outlined on p112.	None.
Thames Water	As part of our five year business plan Thames Water advise OFWAT on the funding required to accommodate growth in our networks and at all our treatment works. As a result we base our investment programmes on development plan allocations which form the clearest picture of the shape of the community (as recognised in PPS12). Where the infrastructure is not available we may require an 18-month to three-year lead in time for provision of extra capacity to drain new development sites. If any large engineering works are needed to upgrade infrastructure the lead in time could be up to five years. Implementing new technologies and the construction of new treatment works could take up to ten years.	Noted.	None.
Thames Water	Indicator : Number of developments approved against the recommendation of the statutory water/sewerage undertaker on low pressure / flooding grounds.	Agreed.	Added new indicator to table on p113.
Thames Water	When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.	Agreed.	Para added to p74 (flooding section).

Consultee	Response	Officer comment	Change to SR
Thames Water	Flood risk sustainability objectives should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure is not in place ahead of development.	The flooding objective covers all types of flooding.	Sentence added to p73 to make this point clear.
Environment Agency	We are pleased to note that flooding, land contamination, pollution, water, biodiversity and climate change have been considered in the sustainability appraisal objectives	Noted.	None.
Environment Agency	The SA Objective – <i>To minimise the human harm from flooding</i> should be reworded to read “ to reduce and manage flood risk ”. This will be in line with the National Policy Planning Framework and the borough policy statement on flood defence	The objective 'to minimise the harm from flooding' is in line with East Surrey SA framework, recently revised following consultation with statutory bodies. This comment is noted for possible future revisions to the framework.	None.
Environment Agency	Our mapping gives an indication of areas susceptible to surface water flooding in the borough. The adequacy of the existing surface water drainage system should be considered and mitigation measures proposed if surface water flooding is found to affect areas of redevelopment. To avoid exacerbating any surface water flood risk, and to improve flood risk management in the wider catchment, we recommend that a sustainable drainage strategy is integrated into any proposals at an early stage. The use of green roofs, swales, detention ponds or wetlands would provide habitat and amenity benefits as well as improving the quantity and quality of runoff.	Agreed. Noted.	None.
Environment Agency	The plan should include an assessment of flood risk from these sources and a programme of actions to manage these risks. SWMP will help put in place: <ul style="list-style-type: none"> • support for greater use of Sustainable Drainage Systems (SuDS) to help avoid large investments in unsustainable hard infrastructure; • identify design approaches that avoid and reduce flood risk to and from new development; • information to improve emergency planning decisions for local authorities and awareness of surface water flooding when preparing for emergencies. 	Agreed. Noted.	None.
Environment Agency	To avoid this for new buildings, sound planning should ensure that properties are built with ground floor levels at a locally specified height to achieve satisfactory flood protection. This is a very simple and low cost action that is easy to carry forward into general design practice	Agreed. Noted.	None.
Environment Agency	If flood water cannot be kept out of a building, then damage and the burden of recovery can be significantly reduced if furnishings are easily removable and reliable flood warnings can be given. Resilience of electrical and telecoms installations may also be increased by raising the level of power sockets and switchboards.	Noted.	None.

Consultee	Response	Officer comment	Change to SR
	It is also important to consider resistance and resilience for critical infrastructure. Critical infrastructure comprises 'those facilities, systems, sites and networks necessary for the functioning of the country and the delivery of the essential services upon which daily life depends'. Measure to reduce flood risk should be adopted as an integral part of any critical infrastructure owner's business plan.	Noted.	
Environment Agency	The importance of communication networks should not be underestimated. In particular, mobile phone networks nowadays form a key aspect of communication during emergency and recovery situations. It is therefore important that the siting of key mobile phone infrastructure has high resilience from direct flooding and also from loss of electrical supply due to flooding.	Noted.	None.
Environment Agency	Many developments are built with ground floor levels lower than adjacent highways. This creates a situation of vulnerability. This can be the case in flat, low lying areas where the highway construction thickness results in the finished surface of the highway becoming elevated above adjacent building plots. This can be avoided at the design phase.	Noted.	Paragraph added to p76.
Environment Agency	<p><u>Public transport systems</u> Main transport systems – such as railways, transit systems, canals and principal roads – should also be developed and managed with regard to flood risk. Careful design and appropriate retrofits are capable of improving resilience and so avoiding the loss of public transport in what may be a relatively minor flood event.</p> <p>Sometimes flood water runs off other impermeable surfaces in an urban area and may access a transport system at only one low spot, but nevertheless cause widespread disruption. It is good practice to consider reliability, availability, maintainability and safety/security (RAMS) in the design of major transport infrastructure. This work should include flood risk, management of surface water and exceedance flood routing</p> <p>It may be possible to adjust local ground levels or construct small scale flood walls to deflect a flood route from a railway into an area which has a less critical use. Canals should have detailed consideration as they may be elevated and a source of flood risk to adjacent property.</p> <p>Where flooding from watercourses or surface water sources occurs, the impacts may be worsened by foul water flooding. This may be caused by surface water entering foul drainage systems through yard gullies or other ground-level gratings. The risk of foul flooding in such circumstances may be reduced by more 'defensive design'</p>	Noted. This will be addressed through DMP.	None.
Environment Agency	<p><u>Infrastructure provision</u> The capacity of the Environmental infrastructure to support growth is very critical. The Environment Agency supports growth that can be supported by the necessary environmental infrastructure (for water resources, wastewater, waste and flood risk management), provided in</p>	Agreed. Noted for appraisal.	None.

Consultee	Response	Officer comment	Change to SR
	<p>a co-ordinated and timely manner to meet the physical and social needs of both new development and existing communities.</p> <p>Early investment and careful planning may be required to ensure expanded or improved infrastructure will have the capacity to cope with additional demands, particularly with climate change. See our report '<i>Hidden Infrastructure: The Pressures on Environmental infrastructure</i>. The report can be downloaded at http://publications.environment-agency.gov.uk/pdf/GEHO0307BMCD-E-E.pdf</p> <p>Therefore the infrastructure should be sufficient to guarantee both surface and ground water quality would not be detrimentally affected, and avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property and pollution of land and watercourses.</p>		
Environment Agency	<p><u>Water Stress</u></p> <p>Reigate and Banstead falls within an area of "serious" water stress¹⁴. In addition, the Environment Agency's assessment¹⁵ of water availability and the impacts of existing abstraction on the aquatic environment in the catchment shows that the sub catchments are "no water available" or "over licensed". This means that there is limited environmental capacity locally to support further abstraction to meet demand from new development.</p> <p>Increasing resource availability therefore needs to focus on optimising the use of existing resources. To do this, development in the borough will require the highest level of water efficiency activity and therefore more stringent water consumption targets than those set out by Building Regulations, which may be adequate for other parts of the country.</p>	Noted.	New paragraphs added to 'water' section (p110)
Environment Agency	<p>In preparing the SA, the council must:</p> <p>i) ensure that the rate of development broadly accords with the capacity of existing water supply, sewage treatment and discharge systems, particularly in connection with major new development</p> <p>ii) require development to incorporate measures to enhance water efficiency, and sustainable drainage solutions</p> <p>iii) work with the Environment Agency and water companies to identify infrastructure needs and allocate areas for and permit necessary infrastructure</p>		
Environment Agency	<p>We are pleased to note that land contamination issues have been reflected in the scoping report. This would further be enhanced by the report reflecting the economic opportunities and potential constraints associated with strategically assessing and treating brownfield land in the</p>	Noted.	None.

¹⁴ Environment Agency (2007) Areas of water stress: final classification

¹⁵ As shown in the Catchment Abstraction Management Strategy's (2006)

Consultee	Response	Officer comment	Change to SR
	<ul style="list-style-type: none"> • uphold the rule of law and the democratic process. <p>The National Flood Emergency Framework is intended to cover the development, maintenance, testing and, when necessary, implementation of operational response arrangements that are:</p> <ul style="list-style-type: none"> • able to respond promptly to any changes in alert levels; • developed on an integrated basis, combining local flexibility with national consistency and equity; • capable of implementation in a flexible, phased, sustainable and proportionate way; • based on the best available scientific evidence; • based on existing services, systems and processes wherever possible, augmenting, adapting and complementing them as necessary to meet the unique challenges of a flood emergency; • understood by, and acceptable to, emergency planners and responders; • designed to promote the earliest possible return to normality. <p>Civil Contingencies Act 2004 (CCA) – Legislation that aims to provide a single framework for civil protection. The Act and accompanying non-legislative measures, delivers a single framework for civil protection in the country.</p> <p>The National Flood and Coast Erosion Management Strategy (July 2011) require communities to prepare flood action plans and link with the Cabinet Office’s initiative to develop wider community resilience to threats and hazards.</p> <p>Part 1 of the Act and supporting regulations and statutory guidance establish a clear set of roles and responsibilities for those involved in emergency preparation and response at the local level. They are required to:</p> <ul style="list-style-type: none"> • assess the risk of emergencies occurring and use this to inform contingency planning; • put in place emergency plans; • put in place Business Continuity Management arrangements; • put in place arrangements to make information available to the public about civil protection matters and maintain arrangements to warn, inform and advise the public in the event of an emergency; • provide advice and assistance to businesses and voluntary organisations about business continuity management (Local Authorities only); • share information with other local responders to enhance co-ordination; and • co-operate with other local responders to enhance co-ordination and efficiency 	<p>Noted. No significant issues for SA.</p>	<p>None.</p>

Consultee	Response	Officer comment	Change to SR
	<p>councils will bring together the relevant bodies, which will have a duty to cooperate, to develop local strategies for managing local flood risk.</p> <ul style="list-style-type: none"> • Protection of assets which help manage flood risk – The Environment Agency, local authorities and internal drainage boards will be able to ensure that private assets which help manage the risks of floods cannot be altered without consent. For example, putting a gate in a wall that is helping protect an area could increase the risk of flooding. • Powers to carry out environmental works – the Environment Agency, local authorities and internal drainage boards will be able to manage water levels to deliver leisure, habitat and other environmental benefits. • Sustainable drainage – drainage systems for all new developments will need to be in line with new National Standards to help manage and reduce the flow of surface water into the sewerage system. • New sewer standards – all sewers will be built to agreed standards in future so that they are adopted and maintained by the relevant sewerage company. 		
Environment Agency	<p>The Flood Risk Regulations 2009 have now come into force. Its purpose is to transpose the EC Floods Directive (Directive 2007/60/EC on the assessment and management of flood risks) into domestic law and to implement its provisions. In particular, it places duties on the Environment Agency and local authorities to prepare flood risk assessments, flood risk maps and flood risk management plans. Under the Flood Risk Regulations 2009 LLFAs are also responsible for assessing, mapping and planning for local flood risk, and any interaction these have with drainage systems and other sources of flooding, including from sewers. Water companies will work with LLFAs to help manage surface water flooding.</p> <p>Flood Risk Regulations 2009</p>	Noted.	Added to App. B
English Heritage	<p>English Heritage was consulted back in May on draft revised sustainability objectives for East Surrey authorities. I made a number of comments:</p> <p>I would prefer "conserve and enhance" or "conserve or enhance" as this reflects both the terminology in the NPPF and EH's approach to constructive conservation - allowing sensitive change that is carefully managed so as not to detract from the significance of an asset.</p> <p>I am not sure what you mean by the "natural" environment in this objective. Biodiversity is covered by objective 13, so I presume that this is a reference to landscape ? If so, then perhaps you could make this distinction.</p> <p>Given the reference to the "historic environment", which is a holistic term, there is no need to specifically mention "archaeological". I would like a mention of "setting", although I accept that this should be taken to be included within the generic term "historic environment".</p>	Agreed. This objective wording has been agreed by East Surrey SA group and objectives have been revised.	Revise objective wording in line with ES revised framework.
English	The overview of the historic environment within the Borough is generally very good, but it omits	Agreed. Revise section as	

Consultee	Response	Officer comment	Change to SR
Heritage	to mention the two Grade II registered historic parks and gardens within the Borough; Lower Gatton Park and Reigate Priory. This section should also use both quantitative and qualitative information to describe the future likely state of the historic environment, providing the basis for identifying sustainability issues, predicting and monitoring effects and alternative ways of dealing with them. The section on sustainability issues/problems/opportunities seems a little weak as it is and this approach might help bolster it.	suggested.	
English Heritage	The English Heritage guidance sets out a long list of potential indicators, from which “% of planning applications for which archaeological investigations were required prior to approval” might be a useful addition.	Agreed.	Indicator added to p125
English Heritage	The Key Decision Aiding Questions are perhaps a little blunt. The English Heritage guidance on SEA/SA suggests more refined questions which are likely to be more meaningful when assessing a policy or proposal against the sustainability objective than taking all cultural assets together. For example: “will it protect Registered Parks and Gardens?”, “will it preserve or enhance the character or appearance of conservation areas and their setting?”, “will it conserve locally important buildings and townscapes?”, “will it improve the quality of the historic environment?” and “will it respect, maintain and strengthen local distinctiveness and sense of place?” may be appropriate.	The decision aiding questions have been agreed as part of an East Surrey-wide framework, however the suggested decision-aiding questions have been added.	DAQ added to ‘heritage’ section.
English Heritage	In Appendix B, The plans, policies and programmes reviewed for cultural heritage and the historic environment should refer to the National Heritage Protection Plan rather than the English Heritage Strategy 2005-2010. Are there any Conservation Area Appraisals or Management Plans to which reference could also be made?	Noted. Conservation area appraisals will be used for area specific appraisals, for example the urban extension work.	National Heritage Protection Plan added to list of ppps.
Mole Valley DC	I can confirm that Mole Valley DC has no comments to make on the draft Reigate & Banstead LDF SA/SEA Scoping Report.	Noted	

Appendix B continued: Responses to the updated SA Scoping Report 2017 consultation and how these were addressed

Organisation	Comment	Changes to Scoping Report
Environment Agency	<p>There have been recent updates to climate change allowances, which may affect flood risk calculations. This guidance shows anticipated changes in peak river flow, peak rainfall intensity, sea level rise, and offshore wind speed and extreme wave height, and can be found at https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances.</p>	<p>This information has been added.</p>
	<p>Guidance has been published setting out when Natural England and the Environment Agency need to be consulted. There is advice for local planning authorities at https://www.gov.uk/guidance/local-planning-authorities-get-environmental-advice; for developers at https://www.gov.uk/guidance/developers-get-environmental-advice-on-your-planning-proposals; and for neighbourhood planning groups at https://www.gov.uk/guidance/consulting-on-neighbourhood-plans-and-development-orders.</p>	<p>Noted, but no change to the Scoping Report necessary.</p>
	<p>Important to be sure you are using the latest Environment Agency data as part of the evidence base: http://environment.data.gov.uk/ds/partners/index.jsp#/partners/login</p>	<p>This site has been used as the basis for environmental statistics where relevant.</p>
	<p>A new Flood Risk Assessment template is available at https://www.gov.uk/guidance/flood-risk-and-coastal-change#Site-Specific-Flood-Risk-Assessment-checklist-section. Please help communicate this to your team, customers, and developers, and add a link to it on your planning website.</p>	<p>Noted, but no change to the Scoping Report necessary.</p>
	<p>Please continue to encourage developers to apply to the Environment Agency for early pre-application advice. We recommend adding a link to https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/297018/LIT_9015_c2822b.pdf to your website.</p>	<p>Noted, but no change to the Scoping Report necessary.</p>
	<p>In the Mole Valley catchment there are five measures to prevent risk (based around working with local planning authorities to influence spatial planning and supporting them in making updates to Strategic Flood Risk Assessments and local development plans); four measures to prepare for flood risk (based around emergency planning, community flood plans, and refining flood warning services); and nine measures to protect from flood risk (based around managing and maintaining flood defence schemes).</p>	<p>This information has been added.</p>
	<p>The Upper Mole Flood Alleviation Scheme is an ongoing project in the Crawley area to provide flood storage areas to protect local communities.</p>	<p>This information has been added.</p>

	<p>The Redhill Flood Alleviation Scheme will formalise storage already provided by wetlands through working with landowners, and will reduce the risk of flooding to communities in Redhill and Earlswood along the Redhill Brook.</p>	<p>This information has been added.</p>
	<p>The River Mole partnership has identified the following priority issues: man-made modifications to the river; pollution from waste water; and diffuse pollution from farmland. In response to this, it aims to remove barriers that are impeding fish passage and thus contribute to the recovery of populations of brown trout, Atlantic salmon, and European eel; install fish bypasses on the five weirs of the Lower Mole Flood Alleviation Scheme; and restore natural morphology to man-modified parts of the river through channel habitat creation, gravel reintroduction, tree works, and back waters.</p>	<p>This information has been added.</p>
Historic England	<p>Provided a generic guidance document, and said that they have no specific suggestions for the policies, plans, and programmes or baseline data sections, but that we should consult the generic guidance. They have no further comments on the sustainability issues section; they support the use of the East Surrey Sustainability Objectives; and they agree that the appropriate issues are reflected in the scoping report.</p>	<p>Noted, but no change to the Scoping Report necessary.</p>
	<p>Potential Plans, Policies, and Programmes to include: UNESCO World Heritage Convention European Landscape Convention Convention for the Protection of the Architectural Heritage of Europe European Convention on the Protection of Archaeological Heritage Planning (Listed Buildings and Conservation Areas) Act 1990 Ancient Monuments and Archaeological Areas Act 1979 Marine and Coastal Access Act 2009 National Planning Policy Framework National Policy Statements Local Plans Marine Plans National Park/AONB Management Plans Heritage/Conservation Strategies Other Strategies (i.e. Cultural or Tourism) Conservation Character Appraisals and Management Plans World Heritage Site Management Plans</p>	<p>Most of these were already included, and others were considered not relevant enough for inclusion. However, the Planning (Listed Buildings and Conservation Areas) Act 1990 and the Ancient Monuments and Archaeological Areas Act 1979 have been added to Appendix A, as have the various Conservation Area Character Appraisals developed by the planning team.</p>
	<p>Baseline Data: Good Practice Advice Note 1 (https://content.historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/gpa1.pdf/) contains advice on relevant sources of evidence.</p>	<p>Sourcing improved in the updated Scoping Report</p>

Natural England	The baseline data should also consider the presence of protected or priority species, including Annex I and regularly occurring migratory birds.	Discussion of other Natura 2000 sites and the presence of protected species within them has been added.
	The baseline data should take into consideration the Surrey Hills AONB and reference the most up-to-date AONB Management Plan.	It is unclear where this would be mentioned in the baseline, considering it is already referred to in the previous section of the report.
	An evidence base of maps, inventories and government policies would be useful in assessing the potential impact of the plan on UK Biodiversity Action Plan priority habitats and local sites.	Information of this kind has already been included in the plan, and it is unclear what additional information this comment requests.
	A measure of biodiversity net gain or loss should be included - the Defra biodiversity offsetting metric or the environment bank biodiversity impact calculator could help.	Assuming this refers to calculating biodiversity net loss or gain over the past year (or a longer period), it is considered that the amount of work that would be needed to determine this would not be proportionate to the requirements of a Sustainability Appraisal Scoping Report.
	Natural England would like to highlight that green space, wild green space, and green infrastructure can all be used to create connected green space suitable for species adaptation to climate change.	Noted, and a forthcoming Green Infrastructure Strategy aims to address this topic in more detail.
	Protected and priority species, and priority habitats and local sites, could be addressed in the issues section.	A paragraph about pressures on local sites, including the SAC and SSSIs is already included.
	Objective 13: 'good quality soil' should be changed to 'best and most versatile (BMV) agricultural land (grades 1-3a)'.	This change has been implemented.
	The plan should not only take account of the effect of climate change on biodiversity, but should also try to increase the resilience of these ecosystems.	A reference to ecosystem resilience has been added to the relevant guiding question under objective 16.
	Objective 16: the SAC should be mentioned in the guiding questions here, not under objective 15.	This change has been implemented.

Surrey County Council	<p>PPPs should include Surrey Local Flood Risk Management Strategy (https://www.surreycc.gov.uk/people-and-community/emergency-planning-and-community-safety/flooding-advice/more-about-flooding/surrey-local-flood-risk-management-strategy), although a new one is due in 2017.</p>	Added to Appendix A
	<p>PPPs should include Reigate and Banstead Strategic Flood Risk Assessment 2012 (http://www.reigate-banstead.gov.uk/downloads/file/200/reigate_and_banstead_strategic_flood_risk_assessment_2012).</p>	Added to Appendix A
	<p>Objective 11 - there is a cost implication of protecting against identified flood risk. Can the fourth guiding question be reworded to: 'Ensure that increased flooding extreme risks are understood and to reduce where possible?'</p>	This change has been implemented.
	<p>Para 3.50 - change the school place numbers to 1765 (reception) and 1323 (secondary).</p>	This change has been implemented.
	<p>School place demand figures do not tally with SCC's - they are in the same ball park, however, and there are different ways to interpret demand so they are not necessarily wrong - however, they would like to understand where we got them from.</p>	After explaining the source to SCC, no further response was received. Consequently, these numbers have been retained in the updated report.
	<p>PPPs could include 1857 Burial Act.</p>	It was felt that researching and including legislation from over 150 years ago would not be proportionate.
	<p>Heritage assets discussion is based on the 1993 SPD which is now very out of date - should use the County Historic Environment Record as a source instead.</p>	These figures have been updated in consultation with the conservation officer.
	<p>Objective 3 - there is a problem with the lack of museum and archaeological archive facilities for the area, which makes it difficult to fulfil the objective of 'improving access to the authority's cultural assets' unless a suitable public repository for planning-generated archaeological material is identified.</p>	This information has been added.