



Development Management Plan

Sustainability Appraisal Report

October 2017

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Non-Technical Summary

This is the non-technical summary of the sustainability appraisal for the Reigate & Banstead Borough Council Development Management Plan (DMP) Regulation 19 document. The sustainability appraisal is required under Section 19 of the Planning and Compulsory Purchase Act 2004 and the Environmental Assessment of Plans and Programmes Regulations 2004, and should evaluate the environmental, economic, and social sustainability of the proposals contained in the DMP document. Alternative options should be explored where appropriate, and an explanation given for why the proposals included in the DMP document were chosen.

Plan Preparation Process

The Reigate & Banstead local plan will contain two key documents – the Core Strategy and the DMP. The Core Strategy was adopted by the Council on 3 July 2014, and sets out the strategic vision for the borough up to 2027. The DMP will provide a more specific guide to decision-making and development in the borough, containing policies against which applications for planning permission will be judged and site allocations that will assist the borough in achieving the strategic goals of the Core Strategy, particularly in relation to housing provision.

The DMP went to a Regulation 18 consultation in 2016, where residents and other stakeholders were asked to comment on broad proposals. A sustainability appraisal was produced for the Regulation 18 document. Following this consultation, a new scoping report was produced to evaluate the environmental, economic, and social issues in the borough. The scoping report was consulted on with the statutory consultees and surrounding local authorities and some changes were made. This scoping report informed the production of the current sustainability appraisal, which will be published and consulted on at the same time as the Regulation 19 DMP document.

This sustainability appraisal evaluates the proposed objectives and policies of the DMP, the potential site allocations in a number of areas (including some alternative options that were not evaluated at Regulation 18 stage), spatial options and potential site allocations for safeguarding land after the end of the current plan period (which was also not examined at the Regulation 18 stage), and re-evaluates policy options for airport parking in the light of comments received during the earlier consultation.

Scoping Report

The scoping report examined a wide range of related plans at the international, European, national, and regional level to identify the environmental, economic, and social objectives or targets to which Reigate & Banstead should be contributing. In particular, at the European level, there are targets for a 20% improvement in energy efficiency, an increase in energy efficient buildings, 15% of energy to come from renewable sources, and various targets on air quality, flooding, and environmental noise. The Council must also consider issues related

to climate change mitigation, biodiversity protection, housing provision, and the protection of important landscape areas such as the Area of Outstanding Natural Beauty.

The baseline environmental, economic, and social situation in the borough was then investigated through the collection of statistics on key indicators, along with information from previous years and from the wider geographical region to allow for comparisons and the identification of trends. This information was used to identify the key sustainability issues and problems in the borough at the present time. These are presented in the table below.

Topic	Issues and Problems	Potential Ways to Address
Housing	<ul style="list-style-type: none"> • High house prices and house price to wages ratio • High level of underoccupation of houses 	<ul style="list-style-type: none"> • Providing appropriate levels of housing and housing mix
Health	<ul style="list-style-type: none"> • Ageing population, potentially facing poor health • Low levels of physical activity, high numbers of overweight/obese people 	<ul style="list-style-type: none"> • Planning for open space • Provision of pedestrian and cycle facilities • Disability-friendly design
Transport	<ul style="list-style-type: none"> • High levels of private car use 	<ul style="list-style-type: none"> • Provision of pedestrian and cycle facilities
Deprivation	<ul style="list-style-type: none"> • Pockets of deprivation in parts of Redhill, Merstham, Central Horley, and Preston • Increase in households placed into temporary accommodation 	<ul style="list-style-type: none"> • Providing appropriate levels of affordable housing • Planning for necessary health and education facilities
Employment and Incomes	<ul style="list-style-type: none"> • Falling wages, particularly for women • Inequality between different parts of the borough 	<ul style="list-style-type: none"> • Allocating some employment uses in more deprived areas • Policies requiring developers to take on local apprentices
Businesses	<ul style="list-style-type: none"> • Relatively low long-term survival rate for Surrey • High percentage of knowledge-based businesses 	<ul style="list-style-type: none"> • Continued support for local start-ups
Energy and Emissions	<ul style="list-style-type: none"> • Energy use reducing more slowly than in other areas • High levels of transport emissions • Limited renewable energy production 	<ul style="list-style-type: none"> • Require more energy efficiency and renewable energy production on new developments • Provision of pedestrian and cycle facilities
Biodiversity and Environmental Protection	<ul style="list-style-type: none"> • Pressures on the Special Area of Conservation • Poor condition of the Sites of Special Scientific Interest • Poor condition of groundwater and surface water 	<ul style="list-style-type: none"> • Habitats Regulation Assessment will identify risks to SAC • Develop and protect wider network of green and blue infrastructure
Air, Noise, and Light Pollution	<ul style="list-style-type: none"> • Impacts from Gatwick Airport and the motorways • A number of Air Quality Management Areas in the borough 	<ul style="list-style-type: none"> • Require impact assessments and mitigation in areas at risk

Flood Risk	<ul style="list-style-type: none"> • A lot of land south of the M25 susceptible to flooding • Flooding likely to increase as climate change worsens 	<ul style="list-style-type: none"> • Direct development away from areas of flood risk
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The scoping report went on to set out the sustainability appraisal framework. This is the series of objectives against which the policies, objectives, spatial options, and site allocations will be evaluated in the sustainability appraisal. The framework used is the East Surrey Local Authority Sustainability Objectives, which have been developed, consulted on, and refined over a number of years of collaboration between five local authorities: Reigate & Banstead Borough Council, Mole Valley District Council, Elmbridge Borough Council, Tandridge District Council, and Epsom & Ewell Borough Council. The objectives are presented in the table below.

Number	Objective
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 conserve and enhance archaeological, historic, and cultural assets and their setting
4	To reduce the need to travel, encourage sustainable transport options and improve accessibility to all services and facilities
5	To make the best use of previously developed land and existing buildings
6	To support economic growth which is inclusive, innovative, and sustainable
7	To provide for employment opportunities to meet the needs of the local economy
8	To reduce greenhouse gas emissions and move to a low carbon economy
9	To use natural resources prudently
10	To adapt to the changing climate
11	To reduce flood risk
12	To improve the water quality of rivers and groundwater, and maintain an adequate supply of water
13	To reduce land contamination and safeguard soil quality and quantity
14	To ensure air quality continues to improve and noise and light pollution are reduced
15	To protect and enhance landscape character
16	To conserve and enhance biodiversity

The scoping report was sent to the statutory consultees and surrounding local authorities for consultation. Responses from Historic England, Natural England, the Environment Agency, and Surrey County Council were used to update some aspects of the baseline information and related plans and programmes.

Development of Alternatives

It is required to consider a range of alternative options during the DMP process, to ensure that the most suitable options have been chosen to promote sustainable development in the borough. The DMP objectives and policies emerged during the Regulation 18 stage of the process, including through the evaluation of a number of potential policy approaches. These options were given [a full sustainability appraisal at the Regulation 18 stage](#). The chosen objectives and policies were included in the Regulation 18 DMP document, and although the

policies have been refined somewhat in response to the consultation representations and discussions with stakeholders, it is not felt necessary to completely revisit and re-appraise all of the potential policy options. The one exception to this is for the airport parking policy, where a number of inconsistencies in the sustainability appraisal were pointed out during the Regulation 18 DMP consultation. In addition, a number of new policies have been added to the DMP since the Regulation 18 consultation, and these policies have received a full appraisal of potential policy options in this report. All the chosen objectives and policies have been re-evaluated in this sustainability appraisal to ensure consistency of approach.

A wide range of potential site allocations were also appraised at the Regulation 18 stage. No additional options have emerged for site allocations for Sustainable Urban Extensions or Strategic Employment Sites, although all the sites have been evaluated again in this sustainability appraisal to ensure consistency of approach. For sites in urban areas, 32 sites had previously been appraised at Regulation 18 stage, and an additional 29 potentially suitable sites have emerged since, through the Regulation 18 DMP consultation and the Housing and Employment Land Availability Assessment (HELAA). All of these 61 sites have been evaluated in this sustainability appraisal. A Traveller Site Land Availability Assessment (TSLAA) has also been undertaken to identify potentially appropriate sites for Traveller communities. The TSLAA narrowed the suitable sites down to 10, and these sites have been appraised.

Since the Regulation 18 consultation, work has also taken place to identify potential sites to safeguard beyond the end of the current plan period. Five spatial options based on different sizes and locations of potential safeguarded land were developed by officers and have been appraised. In addition, 37 potential safeguarding areas were identified from previous technical work undertaken for the Core Strategy, the Regulation 18 DMP document, and the HELAA and these sites have all been appraised.

Sustainability Appraisal Process

Each objective, policy, spatial option, and potential site allocation was evaluated against the sixteen objectives of the sustainability appraisal framework. For each objective, one of five scores was awarded, as shown in the table below.

++	This is expected to have a very positive impact on achieving the sustainability objective
+	This is expected to have a positive impact on achieving the sustainability objective
0	This is expected to have a neutral impact on achieving the sustainability objective
-	This is expected to have a negative impact on achieving the sustainability objective
--	This is expected to have a very negative impact on achieving the sustainability objective

In the full sustainability appraisal report, individual assessment tables are provided for every objective, policy, spatial option, and site, containing brief explanations of the score awarded for each sustainability objective. Where possible, mitigation measures have also been suggested to reduce negative impacts or, in some cases, accentuate positive impacts further. Appraisal and scoring took place through the use of GIS systems, previously

developed constraints assessments where available, and previously existing planning documents. Where clear information was not available, or a sustainability objective had no clear applicability to an appraisal, this was noted with a question mark rather than a score.

The process is qualitative, and no attempt has been made to develop an overall scoring system for each site, as reducing the appraisal to a single quantitative measure in this way would be an inaccurate representation of the complexities of considering sustainability across the three dimensions of the environmental, economic, and social. Each appraisal should be considered in its entirety, and in relation to all the other appraisals within the same category and to other evaluations that may have taken place during the DMP process, rather than simply selecting sites on the basis of an overall sustainability 'score'.

Results of the Assessment

A total of 23 DMP objectives were appraised. The majority of the objectives scored well, although there was a relatively large amount of missing or unknowable data for this appraisal, in situations where specific site allocations or the additional detail of a DMP policy would be needed to evaluate the impact. The results of the assessment are shown in the table below.

Development Management Plan Objectives																
Objective	Sustainability Objective															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
PE1	0	+	0	+	+	++	++	?	?	0	0	0	+	?	+	0
PE2	0	+	0	+	0	++	++	?	?	0	0	0	0	?	0	0
PE3	0	+	0	+	0	++	++	?	?	0	0	0	0	?	0	0
PE4	0	+	0	++	+	++	++	+	0	0	0	0	0	0	0	0
PE5	0	+	0	+	+	+	+	+	0	0	0	0	0	0	0	0
PE6	0	0	0	+	+	++	+	0	0	0	0	0	0	0	0	0
SC1	+	+	++	0	++	0	0	+	++	+	0	0	+	+	++	0
SC2	++	+	0	0	0	++	0	+	0	0	0	0	0	+	+	0
SC3	0	++	0	0	0	0	0	0	0	0	0	0	+	++	0	0
SC4	0	++	+	0	0	0	0	0	0	+	++	+	0	++	++	++
SC5	+	++	0	+	0	0	0	0	0	+	++	+	0	++	+	+
SC6	0	+	-	+	0	0	0	?	0	-	-	0	0	?	-	-
SC7	0	+	0	+	0	0	0	+	0	0	0	0	0	+	0	0
SC8	0	0	0	0	0	0	0	++	++	++	++	0	0	+	?	+
SC9	+	++	0	0	0	0	0	0	0	++	++	+	0	0	0	0
SC10	?	+	+	0	0	0	0	-	-	+	+	0	0	0	++	++
SC11	0	++	+	+	0	0	0	+	0	++	++	0	0	+	++	++
SC12	0	0	0	+	++	0	0	0	0	0	0	0	++	0	++	0
SC13	0	0	++	0	+	0	0	0	0	0	0	0	0	0	+	0
PS1	++	++	0	?	-	0	0	0	0	0	+	+	?	0	?	?
PS2	0	0	0	+	-	0	0	+	0	0	0	0	?	0	?	?
PS3	++	++	+	+	++	+	+	?	0	+	++	0	?	?	?	?
PS4	+	++	0	++	0	0	0	+	0	++	++	+	0	0	0	0

In responses to the Regulation 18 DMP consultation, some inconsistencies were pointed out in the sustainability appraisal of airport parking policy options. The policy options were therefore reconsidered in this sustainability appraisal. Three options were explored: to not have a policy on the issue and rely on the National Planning Policy Framework and Core Strategy, which would likely allow more airport parking in the borough (Option 1); to retain the current policy from the 2005 Borough Local Plan, which allows some airport parking within the borough under certain strict criteria (Option 2); or to introduce a policy that specifically seeks to restrict all airport parking within the borough (Option 3). Option 3 was chosen, as it would better protect air quality and landscape character, prevent increased noise pollution and traffic congestion, and support Gatwick Airport’s sustainable travel plan. The results of the assessment are shown in the table below.

Airport Parking Policy Options																
Option	Sustainability Objective															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Option 1	0	-	0	-	-	0	+	-	0	0	0	0	0	-	-	0
Option 2	0	0	0	+	+	0	0	+	0	0	0	0	0	+	+	0
Option 3	0	0	0	++	++	0	0	++	0	0	0	0	0	++	++	0

A number of new policies are included in the Regulation 19 DMP which had not previously been appraised for sustainability, and were therefore considered in this report. For tall buildings, the option chosen was to have a specific policy and propose areas in which tall buildings will be looked upon favourably, in order to provide more careful control of tall buildings. For affordable housing, it was decided to have an updated policy with more ambitious requirements, in order to maximise affordable housing delivery in the borough. For both caravans and older people’s accommodation, it was decided to have specific policies to ensure that these kinds of housing are adequately considered when planning the borough. For community facilities, it was decided to have a specific policy which could provide more detail on when the loss of a community facility would be acceptable. For climate change mitigation, it was decided to include policies on both renewable energy generation and energy and water efficiency, in order to complement and further strengthen the existing core strategy policies on sustainable development and construction. For infrastructure, it was decided to have a specific policy that could provide more specific details about what is expected from developers in terms of infrastructure delivery. For safeguarding, it was decided to use a supply-led approach, whereby suitable land is identified and safeguarded regardless of the amount of years of housing land supply it would provide. This was preferable to not safeguarding land, which could lead to planning by appeal and may be judged not to be compliant with national planning policy; and safeguarding land for a specific period of time after the plan period, which may lead to unsustainable sites being safeguarded solely to meet the self-imposed target. The results of the assessments are shown in the tables below.

Affordable Housing Policy Options																
Option	Sustainability Objective															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Option 1 - rely on Core Strategy policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Option 2 - have an updated policy on affordable housing	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Caravan Policy Options																
Option	Sustainability Objective															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Option 1 - rely on Core Strategy national planning policies	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Option 2 - have a specific policy on caravans	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Older People's Accommodation Policy Options																
Option	Sustainability Objective															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Option 1 - rely on NPPF	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Option 2 - have a specific policy on older people's accommodation	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Community Facilities Policy Options																
Option	Sustainability Objective															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Option 1 - rely on Core Strategy policy	0	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0
Option 2 - have an updated policy on community facilities	0	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0

Climate Change Mitigation Policy Options																
Option	Sustainability Objective															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Option 1 - rely on Core Strategy policies on sustainable development and construction	0	+	+	+	+	0	0	+	+	+	+	+	0	+	0	+
Option 2 - have a specific policy on renewable energy generation	0	0	0	0	0	0	+	++	++	0	+	0	0	+	0	0

Option 3 - have a specific policy on energy and water efficiency	0	+	0	0	0	0	0	0	++	++	0	+	++	0	+	0	0
Option 4 - rely on other DMP policies to cover climate change mitigation adequately	0	0	0	0	0	0	0	0	+	+	0	0	0	0	+	0	0

Infrastructure Policy Options																	
Option	Sustainability Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	
Option 1 - rely on Core Strategy policy	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+
Option 2 - have an updated policy on infrastructure	+	0	0	0	0	0	0	0	0	0	+	+	0	0	0	0	

Safeguarding Land for Development Beyond the Plan Period Policy Options																
Option	Sustainability Objective															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Option 1 - do not safeguard land	-	0	-	0	0	0	0	0	0	0	0	0	0	0	-	-
Option 2 - safeguard land for a particular time period after the end of the current plan period	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Option 3 - safeguard land using a supply-led approach	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

A total of 44 DMP policies were appraised. The majority of these policies scored positively, and there were only minor negative issues related to employment provision and renewable energy production from some policies. The results of the assessment are shown in the table below.

DMP Policies																
Policy	Sustainability Objective															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
EMP1	0	0	0	0	++	+	+	0	0	0	0	0	+	0	+	+
EMP2	0	0	0	0	++	+	+	0	0	0	0	0	+	0	+	+
EMP3	0	0	0	0	0	+	+	0	0	0	0	0	0	+	0	0
EMP4	0	0	0	0	+	+	++	0	0	0	0	0	0	0	0	0
EMP5	0	+	0	0	0	0	++	0	0	0	0	0	0	0	0	0
RET1	0	0	0	+	+	+	+	+	0	0	0	0	0	0	0	0
RET2	0	0	0	+	+	+	+	+	0	0	0	0	0	+	+	0
RET3	0	0	0	+	+	+	+	+	0	0	0	0	0	0	0	0

RET4	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0
RET5	0	0	0	+	+	0	-	+	0	0	0	0	0	0	+	0
RET6	0	0	0	0	+	0	-	0	0	0	0	0	0	0	+	0
DES1	+	+	0	0	0	0	0	+	0	+	0	0	0	+	+	+
DES2	+	0	0	0	-	0	0	0	0	0	0	0	0	0	+	+
DES3	+	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0
DES4	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
DES5	+	+	0	0	0	0	0	0	0	0	0	0	0	+	0	0
DES6	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0
DES7	+	+	0	+	0	0	0	+	0	0	+	0	0	0	+	0
DES8	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0
DES9	0	0	0	+	0	+	0	+	0	0	0	0	0	0	+	0
DES10	0	+	0	0	0	0	0	0	0	0	0	0	+	+	0	0
DES11	0	+	0	0	0	0	0	0	0	0	0	0	+	+	0	0
DES12	0	+	+	0	0	0	0	0	0	0	0	0	0	+	+	0
OSR1	0	+	0	0	+	0	0	0	0	+	+	0	0	+	++	+
OSR2	0	+	0	0	0	0	0	0	0	+	+	0	0	+	+	+
OSR3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+
TAP1	0	+	0	+	0	0	0	+	0	0	0	0	0	0	+	0
TAP2	0	+	0	+	+	0	-	+	0	0	+	0	0	+	+	0
CCF1	0	0	0	0	+	0	0	++	++	0	0	0	0	0	0	0
CCF2	0	+	0	0	0	0	0	0	0	++	++	0	0	0	0	0
NHE1	0	+	+	0	0	+	0	-	0	0	0	0	0	0	++	0
NHE2	0	0	0	0	0	0	0	0	++	0	0	+	0	0	0	++
NHE3	0	+	0	0	0	0	0	+	+	0	+	0	0	+	+	+
NHE4	0	+	0	0	0	0	0	+	+	+	+	+	0	+	+	+
NHE5	0	0	+	0	++	0	0	0	0	0	0	0	0	0	+	0
NHE6	0	0	+	0	++	+	+	0	+	0	0	0	0	0	+	0
NHE7	0	0	+	0	+	0	0	0	0	0	0	0	0	0	+	+
NHE8	0	0	0	0	0	+	+	0	0	0	0	0	0	0	+	0
NHE9	0	0	++	0	+	0	0	0	0	0	0	0	0	0	+	0
GTT1	+	0	0	0	-	0	0	0	0	0	0	0	0	0	0	0
CEM1	0	0	0	0	0	0	0	0	0	0	0	+	+	+	+	+
INF1	+	+	0	+	0	0	0	0	0	+	+	0	0	0	0	0
MLS1	+	0	0	0	+	0	0	0	0	0	0	0	0	0	+	0
MLS2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

A total of 66 urban site allocations were appraised, including sites previously evaluated at the Regulation 18 stage and sites that were promoted through the Regulation 18 consultation and the HELAA. The choice of final sites was based on a combination of sustainability, availability, viability, and deliverability, but the sites that were chosen generally performed well in the sustainability appraisal due to being close to town centres and public transport options, low on flood risk, and offering community or employment benefits alongside housing. The results of the assessment can be seen in the table below.

Urban Site Allocations																
Site	Sustainability Objective															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
136-168 High Street, Banstead	+	++	0	+	+	+	++	+	0	++	++	0	+	0	0	0
The Horseshoe, Banstead	0	++	0	+	+	+	++	+	0	+	+	0	0	0	0	0
Banstead Community Centre	+	++	-	+	+	+	++	+	0	++	++	0	0	0	0	0
Land at Wellesford Close, Banstead	+	0	0	-	-	+	+	-	0	++	++	0	0	0	0	0
Land at Kingswood Station	+	0	+	0	++	0	0	0	0	0	0	0	+	+	+	0
Legal and General, Kingswood	?	-	0	0	0	0	0	0	0	++	++	0	+	0	-	0
Former City Gate Mini, 90 The Avenue, Tadworth	+	+	+	0	0	0	0	0	0	++	++	0	+	+	+	0
Laboratory Site, Pitwood Park Industrial Estate, Waterfield, Tadworth	+	-	0	-	-	-	0	0	0	++	++	0	+	-	0	0
Banstead Football Club, Merland Rise, Epsom, Tadworth	+	0	0	-	+	+	+	-	0	++	++	0	0	0	+	0
Church of Epiphany, Merstham	+	+	0	+	+	+	+	+	0	0	0	0	0	0	0	0
Bellway House, Merstham	+	0	0	+	+	0	0	+	0	0	0	0	+	-	+	0
Former Oakley Centre, Merstham	+	+	+	+	++	+	+	+	0	++	++	0	+	0	0	0
Merstham Library	+	+	0	+	++	+	+	+	0	-	-	0	0	0	0	0
Belfry, Redhill	0	++	0	++	+	++	+	++	0	--	--	0	+	-	0	0
Berkeley House, High Street, Redhill	+	++	0	++	-	0	0	++	0	++	++	0	+	-	0	0

Brethren Meeting Room, 2 Redstone Hill, Redhill	+	+	0	0	-	+	+	0	0	+	+	0	+	0	0	0
Brethren Meeting Room, 43 Woodlands Road, Redhill	+	+	0	0	-	+	+	0	0	++	++	0	+	0	0	0
Colebrook, Redhill	++	++	0	++	+	++	+	++	0	-	-	0	+	0	0	0
16-46 Cromwell Road, Redhill	+	++	0	++	+	+	+	++	0	0	0	0	0	-	+	0
Donyngs Car park and Indoor Bowls Centre Car Park	+	+	0	+	+	+	+	+	0	++	++	0	+	0	+	0
Extension to the Rear of West Central, Redhill	+	++	0	++	+	+	+	++	0	++	++	0	+	0	0	0
Former Longmead Centre, Redhill	+	++	+	++	++	+	+	++	0	0	0	0	+	0	0	0
Former Mercedes Garage, Brighton Road, Redhill	+	++	0	++	-	0	0	++	0	--	--	0	+	-	0	0
Former Territorial Army Site, Linkfield House, 3 Batts Lane, Redhill	+	++	+	+	+	+	+	+	0	++	++	0	+	0	0	0
Gloucester Road Car Park, Redhill	+	++	0	++	+	++	++	++	0	0	0	0	+	0	+	0
Grosvenor House, Redhill	++	++	0	++	-	+	0	++	0	0	0	0	+	-	0	0
Hockley Business Centre, Hooley Lane, Redhill	+	+	0	+	0	0	0	+	0	+	+	0	+	+	+	0
Reading Arch Road/Brighton Road North, Redhill	++	++	0	++	+	++	+	++	0	--	--	0	+	-	+	0
Land Between Southbound Railway and eastbound Railway (South of Redhill Train	+	0	0	++	+	+	+	++	0	+	+	0	+	--	0	0

Station)																	
Land North of Brook Road, Redhill	+	+	0	+	0	0	0	+	0	--	--	0	+	-	+	0	
Linkfield Lane Car Park, Redhill	+	++	0	+	+	+	+	+	0	++	++	0	0	0	+	0	
Maple Works, Redhill	?	0	0	0	+	+	+	0	0	--	--	0	+	0	0	0	
Marketfield Way/High Street, Redhill	++	++	+	++	+	++	++	++	0	--	--	0	+	-	+	0	
Quarryside Business Park, Redhill	+	0	0	-	+	0	0	-	0	+	+	0	+	+	0	0	
Redhill Law Courts, Redhill	+	++	0	+	+	+	+	+	0	+	+	0	+	0	+	0	
Royal Mail Sorting Office, Redhill	++	++	0	++	+	++	++	++	0	-	-	0	+	-	+	0	
Albert Road North Industrial Estate, Reigate	+	++	+	+	+	++	+	+	++	0	0	0	+	0	+	0	
Alma House, 1A Alma Road, Reigate	+	++	0	++	-	0	0	++	0	0	0	0	+	0	0	0	
Land Adjacent to the Town Hall, Reigate	+	++	--	++	+	++	++	++	0	++	++	0	0	0	0	0	
Land to the Rear of 45 West Street, Reigate	+	++	-	+	-	+	+	+	0	--	--	0	0	0	0	0	
Land to the Rear of Retail Frontage in Bell Street	?	++	--	+	+	+	+	+	0	-	-	0	+	0	-	0	
Library and Pool House, Reigate	+	++	0	+	0	++	+	+	0	-	-	0	+	0	0	0	
Reigate Station Car Park	+	++	0	++	+	+	+	++	0	++	++	0	+	-	+	0	
Royal Mail Delivery Office, Rushworth Road, Reigate	+	++	0	++	+	+	0	++	0	++	++	0	+	-	+	0	
The Orchard, Bell Street, Reigate	?	+	-	+	-	+	+	+	0	-	-	0	+	0	-	0	
Garage Block, Kingsley	+	+	0	0	+	+	+	0	0	-	-	0	0	0	+	0	

Grove, Woodhatch, Reigate																
Lime Tree School, Alexander Road	+	0	0	-	-	0	0	-	0	++	++	0	+	0	0	0
Field on Bonehurst Road Between Cambridge Hotel and Lawson's Timber Yard, Salfords	++	-	-	-	--	0	+	-	0	0	0	0	0	0	--	0
Salfords Industrial Estate, Bonehurst Road, Salfords	++	+	0	+	-	-	-	+	0	+	+	0	+	+	+	0
Old Philips Site on the Junction of Cross Oak Lane and A23	++	-	0	-	-	-	0	-	0	-	-	0	+	-	0	0
39-49 High Street, Horley	+	+	0	++	+	++	+	++	0	++	++	0	+	0	+	0
50-66 Victoria Road, Horley	+	+	0	++	+	++	+	++	0	++	++	0	+	0	0	0
59-61 Brighton Road, Horley	+	+	0	++	+	+	0	++	0	++	++	0	+	0	0	0
Albert Brewery, Balcombe Road, Horley	+	+	-	++	0	-	-	++	0	0	0	0	+	0	+	0
Brethren Meeting Hall, Whitmore Way, Horley	+	0	0	-	-	+	+	-	0	--	--	0	+	0	0	0
Brethren Meeting Room, The Grove Meeting Hall, The Grove, Horley	+	+	0	++	-	+	+	++	0	++	++	0	0	0	0	0
Bridge Industrial Estate, Horley	+	+	-	++	0	-	-	++	0	0	0	0	+	0	+	0
Central Car Park, Consort Way East, Horley	+	+	0	++	+	+	+	++	0	+	+	0	+	0	+	0
Former Chequers Hotel, Horley	+	0	+	-	++	+	+	-	0	+	+	0	+	0	0	0
High Street Car	+	+	0	++	+	++	++	++	0	+	+	0	+	0	+	0

Park, Horley																
Horley Library	+	+	0	+	0	+	+	+	0	+	+	0	0	0	0	0
Horley Police Station	+	+	0	++	+	+	+	++	0	++	++	0	+	0	+	0
Hutchins Farm, Horley	0	0	0	-	-	0	0	-	0	+	+	0	0	0	0	0
Telephone Exchange, Horley	+	+	0	++	+	+	+	++	0	0	0	0	+	0	0	0
2 Saxley Court and 117 Victoria Road, Horley	+	+	0	++	+	+	+	++	0	++	++	0	+	0	0	0
Royal Mail, Horley	+	+	0	++	+	++	+	++	0	++	++	0	+	0	0	0

The 33 potential Sustainable Urban Extension allocations were appraised at the Regulation 18 stage and have been re-evaluated here to ensure consistency of approach. The preferred sites (ERM1-5, SSW2, SSW6, SSW7, SSW9, NWH1-2, and SEH4) were chosen due to a combination of their sustainability appraisal, their likelihood of being available for development, the proximity to existing or forthcoming urban locations, and assessments of their green belt value, although some mitigation will be necessary around flood risk, landscape impact, and noise and air pollution. The results of the assessment are shown in the table below.

Sustainable Urban Extension Allocations																
Site	Sustainability Objective															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
NWH1	++	+	-	--	0	+	+	--	0	-	-	?	0	-	-	0
NWH2	+	0	0	0	0	+	+	0	0	--	--	0	0	-	0	0
SEH1	++	+	0	++	0	+	+	+	0	-	-	0	0	-	0	0
SEH2	++	-	0	0	0	+	0	0	0	++	++	0	0	-	--	0
SEH3	0	-	0	0	-	+	0	0	0	-	-	0	0	--	--	0
SEH4	++	-	0	++	+	+	0	+	0	-	-	0	+	-	-	0
SEH5	++	-	0	-	0	+	+	-	0	0	0	-	+	-	--	-
SEH6	--	-	0	0	0	+	+	0	0	--	--	-	0	0	0	--
SEH7	+	-	0	+	0	+	+	0	0	--	--	-	0	0	0	0
SEH8	-	0	0	+	0	+	+	0	0	--	--	-	0	0	0	0
SEH9	--	0	0	-	0	+	+	-	0	--	--	-	0	0	-	0
SEH10	+	0	0	--	0	+	+	-	0	--	--	-	0	0	-	0
SEH11	++	0	0	--	0	+	+	-	0	-	-	-	+	0	--	0
SEH12	+	0	--	--	0	+	+	-	0	--	--	-	0	-	--	-
EH1	+	0	0	0	0	+	+	0	0	-	-	0	0	0	-	--
EH2	+	+	0	--	0	+	+	-	0	--	--	0	0	0	--	-
EH3	+	0	0	0	+	+	+	0	0	--	--	0	0	0	--	0
ERM1	++	+	0	+	0	+	+	0	0	++	++	0	+	-	--	-

ERM2	++	+	0	+	0	+	+	0	0	++	++	-	+	-	0	--
ERM3	++	+	0	+	+	+	+	0	0	++	++	-	++	-	-	--
ERM4	++	0	0	-	0	+	+	-	0	++	++	0	0	0	-	-
ERM5	++	0	-	-	0	+	+	-	0	++	++	0	0	0	0	0
ERM6	++	--	-	-	-	+	+	-	0	++	++	0	0	-	0	0
SSW1	++	+	-	-	0	+	+	-	0	++	++	0	0	0	--	0
SSW2	++	+	0	-	0	+	+	-	0	0	0	0	0	0	0	0
SSW3	++	--	0	-	-	+	+	-	0	++	++	0	0	0	-	0
SSW4	++	+	-	--	0	+	+	--	0	0	0	0	0	0	--	0
SSW5	++	+	0	-	0	+	+	-	0	0	0	0	0	0	-	-
SSW6	+	0	0	-	0	+	+	-	0	+	+	0	0	0	-	0
SSW7	+	+	0	-	0	+	+	-	0	++	++	0	0	0	0	0
SSW8	++	--	0	-	-	+	+	-	0	++	++	0	0	0	-	0
SSW9	++	+	-	-	0	+	+	-	0	+	+	0	0	0	-	0
SSW10	++	+	0	-	+	+	+	-	0	++	++	0	0	0	0	0

The 14 potential Strategic Employment Site allocations were included in the sustainability appraisal at the Regulation 18 stage, and have been re-evaluated here to ensure consistency of approach. The decision to allocate an employment site in the south of the borough was taken on the basis of the Strategic Employment Provision Opportunity Study, which also identified that such a site should be a minimum of 20ha in size. However, most of the sites considered posed problems, either through being considerably smaller than 20ha, or through problems with flooding or access to sustainable transport options. The preferred alternative is a combination of sites SEH1 and SEH2 – together, these sites meet the size requirement and score relatively positively on flood risk and sustainable transport, while still presenting some problems relating to landscape impact and noise and air pollution that will need to be mitigated. The results of the assessment are shown in the table below.

Strategic Employment Site Allocations																
Site	Sustainability Objective															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
NWH1	0	0	-	--	0	+	+	-	0	-	-	?	0	-	-	0
NWH2	0	0	0	0	0	+	+	0	0	--	--	0	0	-	0	0
SEH1	0	-	0	++	0	+	+	+	0	-	-	0	0	-	0	0
SEH2	0	-	0	0	0	+	+	0	0	++	++	0	0	-	--	0
SEH3	0	0	0	0	-	+	+	0	0	-	-	0	0	-	--	0
SEH4	--	0	-	++	-	+	+	+	0	-	-	0	+	-	-	-
SEH5	0	0	0	-	0	++	++	-	0	0	0	-	+	-	--	-
SEH6	0	0	0	0	0	+	+	0	0	--	--	-	0	-	0	--
SEH7	0	-	-	+	0	+	+	0	0	--	--	-	0	-	0	0
SEH8	0	0	0	0	0	+	+	0	0	--	--	-	0	-	0	0
SEH9	0	0	0	-	0	+	+	-	0	--	--	-	0	-	-	0
SEH10	0	0	0	--	0	+	+	-	0	--	--	-	0	-	-	0
SEH11	0	0	-	--	0	++	++	-	0	-	-	-	+	-	--	0
SEH12	0	0	--	--	0	++	++	-	0	--	--	-	0	-	--	-

Having decided to safeguard land beyond the end of the plan period in the earlier policy option appraisal, five spatial options for doing so were considered. These were for small, medium, and large urban extensions (Options 1, 2, and 3 respectively), and medium and large standalone settlements (Options 4 and 5 respectively). There was a relatively large amount of missing or unknowable data for this appraisal, as the impact on many of the objectives would depend upon the exact location of a site, rather than the general spatial approach. The preferred alternative is Option 5, a large standalone settlement – this would have the biggest impact on providing housing, and would also be able to provide employment options, community facilities, and potentially new public transport. There would potentially be a large impact on landscape character, but mitigation may be possible depending on the choice of site. The results of the assessment are shown in the table below.

Safeguarding Spatial Options																
Objective	Sustainability Objective															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Option 1	+	-	?	-	+	0	+	-	0	?	?	+	?	0	+	?
Option 2	+	0	?	-	+	+	+	-	0	?	?	+	?	0	+	?
Option 3	+	+	?	0	+	++	++	0	0	?	?	-	?	0	-	?
Option 4	++	+	?	-	-	++	++	0	0	?	?	0	?	0	--	?
Option 5	++	+	?	0	-	++	++	0	0	?	?	0	?	0	--	?

A total of 37 sites were considered for safeguarding, across all five of the spatial options considered above. The sites mostly received positive scores for housing and economic issues, but posed problems for sustainable transport, landscape impact, and, particularly around Horley, flood risk. The preferred site is SAS1. These sites pose some problems relating to landscape and residential amenity, but are of low flood risk, relatively accessible in two cases, and will provide a large amount of housing land. The decision was taken through considering a combination of the sustainability appraisal, the availability and deliverability of the site, and a green belt assessment. The results of the assessment are shown in the table below.

Safeguarding Site Allocations																
Site	Sustainability Objective															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
BAN1	++	-	0	-	0	+	+	-	0	++	++	0	0	0	0	0
BAN2	++	0	0	-	0	+	+	-	0	++	++	0	+	0	--	0
BAN3	++	0	0	-	0	+	+	-	0	++	++	0	0	0	--	0
BAN4	++	0	-	-	0	+	0	-	0	++	++	0	0	0	--	0
BAN5	++	-	-	0	0	+	+	0	0	++	++	0	0	0	-	0
BAN6	++	0	0	-	0	+	+	-	0	++	++	0	0	0	-	0
BAN7	++	0	0	-	0	+	+	-	0	++	++	0	0	0	-	0
BAN8	++	-	0	--	0	+	+	-	0	++	++	0	0	0	0	-
BAN9	++	-	0	--	0	+	+	-	0	++	++	0	0	0	0	-
BV12	++	0	0	0	0	++	++	0	0	++	++	0	+	-	--	-
HC28	+	0	0	-	+	+	0	-	0	+	+	0	0	-	--	0

HE01	--	0	0	-	+	0	0	-	0	--	--	0	+	0	0	-
HE05	+	0	0	-	0	+	+	-	0	-	-	0	+	0	-	0
HE09	--	0	0	-	0	0	0	-	0	--	--	0	0	0	0	-
HE10	+	0	0	-	0	+	+	-	0	0	0	0	0	-	--	0
HE11	-	0	-	0	0	0	0	0	0	-	-	0	+	0	0	0
HE14	--	-	0	--	0	0	0	-	0	--	--	0	+	0	-	0
HE15	--	0	0	-	0	0	0	-	0	--	--	0	0	0	0	0
M21	++	-	0	--	-	+	+	-	0	++	++	0	0	-	0	0
M26	++	+	-	0	0	++	++	0	0	++	++	0	+	-	--	-
RE19	+	0	0	-	0	+	+	-	0	++	++	0	+	0	-	0
RE28	+	0	-	-	+	+	0	-	0	++	++	0	0	0	0	0
SAL1	++	+	0	+	0	++	++	0	0	+	+	0	+	-	-	-
SAL2	++	+	0	0	0	++	++	0	0	+	+	0	+	-	-	-
SAL3	++	+	-	+	0	+	+	0	0	+	+	0	+	-	-	0
SAL4	++	0	0	-	0	+	+	-	0	+	+	0	+	0	-	0
SAL5	++	+	-	0	0	+	+	0	0	+	+	0	0	0	-	0
SAL6	++	0	0	0	0	+	+	0	0	+	+	0	+	-	-	0
SAS1	++	+	0	0	0	++	++	0	0	0	0	0	+	0	--	0
SAS2	++	+	-	0	0	++	++	0	0	+	+	0	+	-	--	0
SAS3	++	+	0	-	0	++	++	-	0	+	+	0	+	-	--	0
SAS4	++	+	0	-	0	++	++	-	0	+	+	0	+	-	--	--
SAS5	++	+	0	0	0	++	++	0	0	+	+	0	+	0	--	-
SPW09	+	+	0	-	0	+	+	-	0	++	++	0	0	0	--	0
SPW15	++	-	0	--	0	+	+	-	0	+	+	0	+	0	--	0
SPW16	+	-	0	--	0	+	+	-	0	+	+	0	0	0	-	--
SPW18	+	-	0	--	0	+	+	-	0	0	0	0	0	0	-	0

A very large number of potential Traveller sites were considered in the TSLAA, the majority of which were dismissed due to one or more major constraints, leading to a shortlist of 11 sites that are evaluated in this sustainability appraisal. The preferred alternatives are sites G3, G4, G9b, and G12. These sites were chosen for their relatively limited landscape impact, more limited contribution to Green Belt purposes, and their availability, although they do display some potential sustainability problems relating to health and wellbeing and sustainable transport that may need mitigation. The results of the assessment are shown in the table below.

Gypsy, Traveller, and Travelling Showperson Site Allocations																
Site	Sustainability Objective															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
BV16	++	0	--	+	0	0	0	+	0	++	++	0	+	0	--	0
BV18A	++	0	0	+	0	0	0	+	0	++	++	0	0	0	--	0
BV18B	++	0	0	+	0	0	0	+	0	++	++	0	0	0	--	0
G3	+	-	0	--	+	0	0	--	0	0	0	0	+	-	0	0
G4	+	-	0	--	+	0	0	--	0	-	-	0	+	-	0	0
G6	++	0	0	-	0	0	0	-	0	0	0	0	0	0	--	0

G9a	+	0	0	+	0	0	0	+	0	0	0	0	0	0	-	0
G9b	+	0	0	+	0	0	0	+	0	+	+	0	0	0	0	0
G11	+	-	0	-	+	0	0	-	0	++	++	0	0	-	0	0
G12	+	0	0	0	0	0	0	0	0	++	++	-	0	0	0	0
The Old Rectory	+	0	0	0	0	0	0	0	0	0	0	-	+	0	0	0

Cumulative Effects

The selected sites were looked at in order to consider their potential cumulative or synergistic impacts on sustainability in the borough. It was felt that one of the major negative cumulative impacts is likely to be on the landscape character of the borough, and this is primarily due to the impact of the Sustainable Urban Extensions and future development on safeguarded land. This will be partly mitigated against by Policy MLS1, which sets out the phasing process for the urban extensions, ensuring they are not all made available for development at one time, therefore allowing for greater control over the landscape impact of these large new developments. Policies requiring good design of new housing, green infrastructure, and open space in new developments will also help to mitigate the landscape impact. Encouragement of greater density on new development in the urban area would also help mitigate against negative landscape impacts by potentially allowing the borough to meet its housing targets with less need for the use of urban extensions or safeguarded land.

In addition to this, transport modelling undertaken for the DMP suggests that the Strategic Employment Site could have strong negative impacts on the traffic network in the borough. When the Strategic Employment Site is removed from consideration, the traffic impacts of the DMP are significantly reduced and fairly evenly spread across the borough; when it is included, the impacts become much stronger, and are more centred on Horley. Mitigation should be identified at the planning permission application stage, at which point a more site-specific transport assessment can be undertaken, but may include infrastructure improvements or measures to significantly reduce the number of trips generated by the development. The report also identified a number of junctions and stretches of road that will be likely to suffer traffic stress from the proposed developments, and site-specific mitigation measures and infrastructural improvements may need to be identified and undertaken for development sites in these areas.

The Infrastructure Delivery Plan 2017, and the evidence studies informing it, assess the cumulative impact of the proposed development on infrastructure in the borough, including schools, health facilities, and utilities. Infrastructure schemes needed to address these impacts are listed in a schedule in the Development Management Plan. These include new schools and extensions to existing schools, particularly in the Redhill and Merstham area, and new or extended medical centres in Reigate and Horley.

Monitoring

The Council prepares a number of annual monitoring reports on town and local centres, commercial development, industrial estates, housing delivery, and environment and sustainability. The statistics contained within these reports provides the basis for analysing trends and evaluating how the implementation of the DMP is affecting sustainability. A review of the Core Strategy must also begin before July 2019, and this will allow for further evaluation of how well the DMP is helping to achieve the targets in the Core Strategy. A new scoping report and sustainability appraisal may also be required if any major changes are needed to the Core Strategy, and this is an opportunity for further analysis of key indicators and statistics.

Through the process of sustainability appraisal, a number of potential key indicators have emerged to track through these monitoring reports, covering the various likely impacts of development and referring back to a number of the sustainability framework objectives. These indicators include:

- Affordable housing provision
- Accessible housing provision
- Amount of development on previously developed land
- Amount of development on greenfield sites
- Transport modal usage
- Number of trips per day at morning and evening peaks on the strategic road network
- Carbon dioxide emissions
- Renewable energy generated
- Energy efficiency of new build housing
- Water efficiency of new build housing
- Monitoring of air quality
- Quality of biodiversity sites
- Water quality
- Access to open or green space
- Access to sport, leisure, and recreation opportunities
- Available school places compared to need for school places
- Waiting times for GP appointments
- Vacancies in town and local centres
- Vacancies in employment areas

1. Introduction and Background

- 1.1. This document is the sustainability appraisal of the Reigate & Banstead Borough Council Development Management Plan Regulation 19 document.

National and International Policy

- 1.2. Sustainability appraisal of local plan documents is a requirement under [Section 19 of the Planning and Compulsory Purchase Act 2004](#), which states that a local planning authority must “carry out an appraisal of the sustainability of the proposals in each [local development] document” and “prepare a report of the findings of the appraisal”. Paragraph 165 of the [2012 National Planning Policy Framework](#) states that “a sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors”.
- 1.3. Sustainability appraisal incorporates the requirements of the [Environmental Assessment of Plans and Programmes Regulations 2004](#), which implements the requirements of [European Directive 2001/42/EC](#), commonly known as the Strategic Environmental Assessment Directive.
- 1.4. Annex I of the EU Directive sets out what should be included in an environmental report to meet the requirements of the Directive. This includes:
- An outline of the contents and main objective of the plan and its relationship with other relevant plans and programmes
 - Relevant aspects of the current state of the environment and the likely outcome without the implementation of the plan
 - Environmental characteristics of areas likely to be significantly affected
 - Existing environmental problems which are relevant to the plan, particularly those relating to areas of environmental importance, and especially those relating to areas designated under EU Directives 79/409/EEC ([The Birds Directive](#)) and 92/43/EEC ([The Habitats Directive](#))
 - Relevant environmental protection objectives established at international, European, or national levels, and how those objectives and any environmental considerations have been taken into account during the preparation of the plan
 - Likely significant effects of the plan on the environment, including on biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage, landscape, and the interrelationship between these factors
 - Measures to prevent, reduce, and offset any significant adverse effects of the plan on the environment

- An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken, including any difficulties encountered
 - A description of the measures envisaged concerning monitoring
 - A non-technical summary
- 1.5. A checklist clearly setting out where all of these elements can be found in the current report is in [Appendix A](#).
- 1.6. In summary, the sustainability appraisal will assess the likely environmental, social, and economic effects of the Development Management Plan, considering a number of reasonable alternatives and setting out possible means for mitigating negative effects of the plan. This will allow for identification of the most sustainable options for the local plan and aid decision-making for the final plan proposals.
- 1.7. A Habitats Regulation Assessment, as required by the fourth bullet point of paragraph 1.4 above, will be conducted and published separately to this report.

Process

- 1.8. [Planning Practice Guidance](#) sets out a five stage process for undertaking a sustainability appraisal, replicated in figure 1 below.
- 1.9. Stage A is “setting the context and objectives, establishing the baseline and deciding on the scope”. This stage was undertaken through the preparation of a scoping report which contained information on related plans and programmes, baseline environmental, economic, and social data for the borough, identification of the key sustainability problems in the borough, and the sustainability appraisal framework. The first draft of the scoping report for this sustainability appraisal was published in December 2016 and sent for consultation to the statutory consultees and the surrounding local authorities. An updated scoping report, containing more recent data and addressing comments and concerns raised during the consultation, [was published in June 2017](#).
- 1.10. This report represents Stages B and C of the process. Stage B is to develop and refine alternatives within the scope of the plan, and to assess the potential effects of these alternatives. This should include a consideration of mitigation measures and monitoring. Stage C is the preparation of the sustainability appraisal report.
- 1.11. A sustainability appraisal report for the Regulation 18 draft of the Development Management Plan [was published in June 2016](#). This was used as part of the process of finalising the Development Management Plan objectives and policy approaches, and it has not been felt necessary to evaluate a range of options in these two areas in this report – the two reports should therefore be read in conjunction with each other. The [2014 Reigate & Banstead Core Strategy](#) appraised a range of spatial options for development in the borough [through a sustainability appraisal](#), and as these are now contained within the adopted Core Strategy, it has also not been felt

necessary to re-appraise broad spatial options like this. The confirmed objectives and policies have been appraised, and all potential site allocations have been appraised, even where they were previously appraised in the Regulation 18 sustainability appraisal – this has been done to ensure that all appraisals within this report are consistent with one another. This report also includes an appraisal of potential spatial approaches to safeguarding land beyond the plan period, which was not included in the Regulation 18 sustainability appraisal.

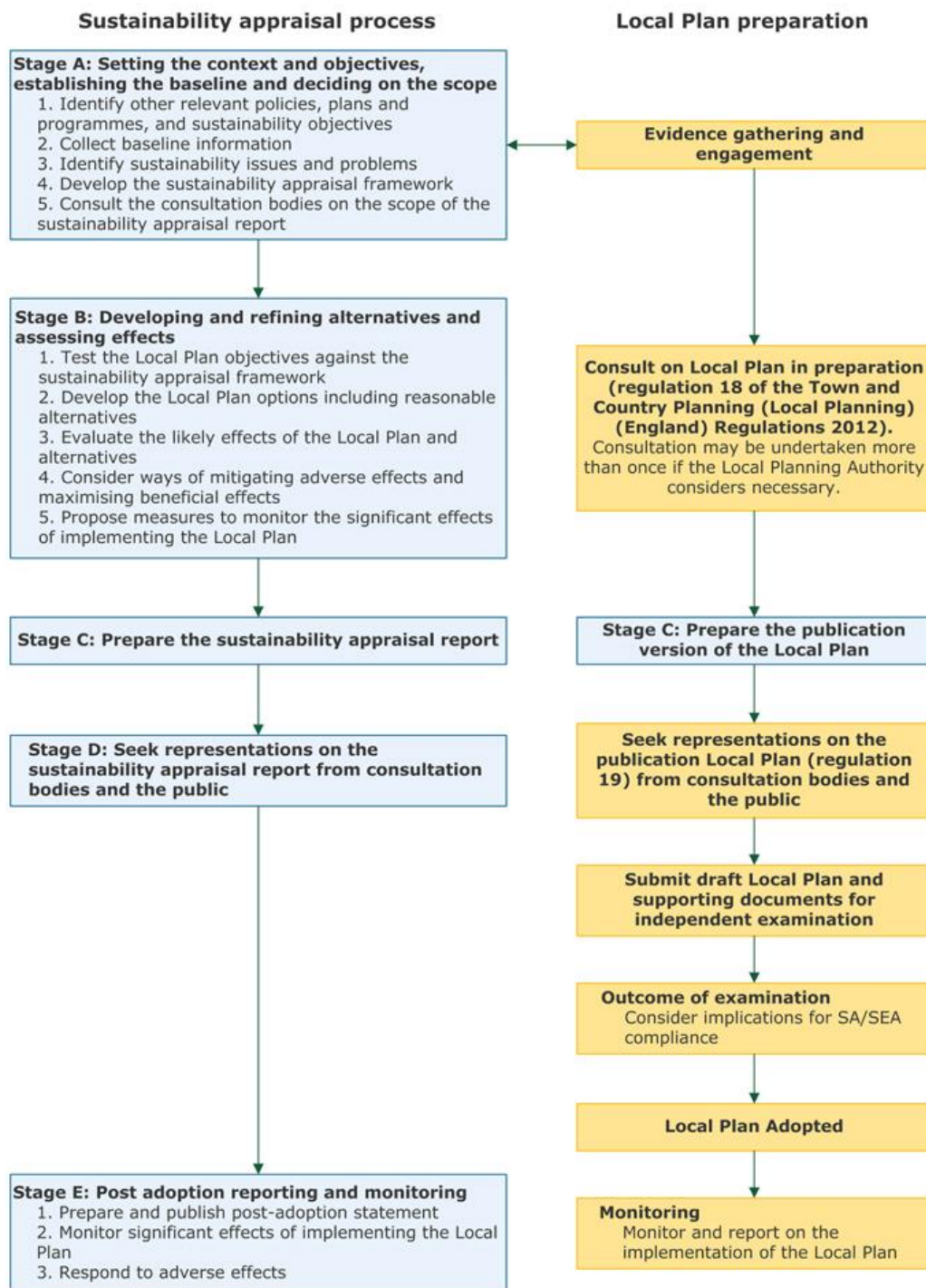


Figure 1: Flow chart of sustainability appraisal process (Planning Practice Guidance)

- 1.12. Stage D is for this report to be consulted on by the statutory consultees and the public. The consultation period for this report will be identical to the general Regulation 19 consultation period for the Development Management Plan.
- 1.13. Stage E is the publication of a post-adoption statement and the monitoring of the effects of the local plan as it is implemented. This stage is beyond the scope of this report, although possibilities for monitoring are identified toward the end of the report. Stage E will be implemented by the Council after the Development Management Plan is adopted.

The Development Management Plan

- 1.14. The Reigate & Banstead local plan will contain two key documents – the Core Strategy and the Development Management Plan. [The Core Strategy](#) was formally adopted on 3 July 2014, and sets out a strategic vision for the borough up to 2027. It provides an overarching spatial vision, a set of 21 core strategic objectives, and a set of 18 strategic policies that will deliver the vision and objectives over the life of the Core Strategy.
- 1.15. The Development Management Plan is the second major element of the local plan, and aims to provide specific, actionable policies to guide decision-making and development in the borough, and to implement the vision, objectives, and policies of the Core Strategy. The Development Management Plan will contain policies against which applications for planning permission will be judged, and site allocations that will assist the borough in achieving the strategic goals of the Core Strategy, particularly in relation to housing provision.

The Layout of This Report

- 1.16. This section of the report has provided the background context for the sustainability appraisal. The second section will summarise the scoping report. The third section will describe the methodology used for the appraisal of objectives, policies, spatial options, and sites, including a description of how alternative options were developed. The fourth section will describe the outcomes of the appraisal process. The fifth section will briefly discuss secondary, cumulative, and synergistic effects, as required under the Strategic Environmental Assessment Directive. The sixth section will close the report by briefly discussing future monitoring of the impacts of the plan.
- 1.17. A number of appendices can be found at the end of the report containing, among other information, detailed appraisal tables for each objective, policy, spatial option, and site that was evaluated. These appendices will be described at the appropriate points in the report.

2. Summary of Scoping Report

- 2.1. The scoping report for the sustainability appraisal was published in December 2016, and sent for consultation with the statutory consultees and all surrounding local authorities. An updated scoping report, containing more recent data and amended in the light of comments received during the consultation period, was published in June 2017. This section of the report briefly summarises the findings of the scoping report. [The full report can be found on the Council's website.](#)

Relevant Plans, Policies, Programmes, and Sustainability Objectives

- 2.2. The first section of the scoping report looked at existing plans, programmes, and objectives that could affect or influence the aims of the Development Management Plan.
- 2.3. On the international level, key issues included a general commitment to implementing social, economic, and environmental sustainability through the Johannesburg Declaration on Sustainable Development (2002), attempts to reduce and stabilise greenhouse gases through the Kyoto Protocol (1997), and the application of the precautionary principle to protect and share the benefits of biodiversity through the Convention on Biological Diversity (1992).
- 2.4. At the European Level, a number of EU Directives commit the UK to particular objectives. On energy issues, the Energy Efficiency Directive (2012) requires a 20% improvement in energy efficiency by 2020; the Energy Performance of Buildings Directive (2010) requires all new buildings to be nearly zero-energy by 2020; and the Renewable Energy Directive (2009) requires 15% of all energy to come from renewable sources and 10% of transport fuel to come from sustainably-sourced biofuels by 2020. The Birds Directive (2009) and Habitats Directive (1992) create networks of protected spaces to provide safety for endangered species. The Air Quality Directive (2008), Floods Directive (2007), and Environmental Noise Directive (2002) all set objectives to protect citizens from negative effects of their local environment.
- 2.5. At a national level, the National Planning Policy Framework (2012) aims to create sustainable development within the UK, and a number of sections in the document address how development can be sustainable in terms of providing economic and social benefits within environmental limits. The Climate Change Plan (2010) builds on the Climate Change Act (2008) which committed to an 80% reduction in greenhouse gas emissions by 2050. A number of other strategies and statements have been published over the past decade, addressing energy efficiency, waste management,

biodiversity, sustainable forestry, and housing, many of them implementing aspects of European or international policy.

- 2.6. At the regional level, the borough is committed to the protection and sustainable management of the Surrey Hills Area of Outstanding Natural Beauty, as outlined in that area's Management Plan (2014); and is involved in both the Gatwick Diamond and Coast 2 Capital initiatives that aim to boost economic and social outcomes in the region. The document Biodiversity planning in Surrey (2014) also identifies the Mole Gap to Reigate Escarpment Special Area of Conservation as the key biodiversity resource in the borough.
- 2.7. A full description of all the plans, policies, programmes, and objectives looked at, as well as a brief description of how they might be taken account of in the Development management Plan, can be found in [Appendix B](#).

Baseline Information

- 2.8. The second section of the scoping report collected a range of information on social, economic, and environmental issues in Reigate & Banstead borough, attempting to identify positive or negative trends where possible, and to make comparisons with other local authorities or figures for the wider region or country where available.
- 2.9. Some notable statistics related to social issues included the ageing demographics of the borough – over-60s make up the largest age category recorded in the borough, while 18-29 year olds make up the smallest, and population projections suggest that the number of over-70s will almost double by 2039. The borough has a problem with housing affordability, with average house prices 31.3% higher and average monthly rent 18.6% higher than across the southeast as a whole. In general, health issues are comparable to the country as a whole, but 63.8% of adults are considered overweight or obese and only 55.7% of adults are classified as physically active. Three wards – Horley Central, Merstham, and Preston – have child obesity rates of over 15%.
- 2.10. Private cars are by far the most popular method of transport in the borough, with 58.5% of working-age residents driving their own car to work – despite this, the use of cars for commuting is actually lower than for the southeast as a whole due to the 15% of the population that commute via train.
- 2.11. Using figures from the Index of Multiple Deprivation, the borough is relatively very prosperous, being ranked as the 290th most deprived local authority out of 353. However, figures from 2011 found that 47% of households in the borough qualified as deprived in at least one of the measures on the index. Pockets of relative deprivation can be found in Merstham, north and central Redhill, the Woodhatch area of Reigate, and south and southwest Horley.
- 2.12. In economic terms, the largest industries in the borough are those related to healthcare and social work, finance and insurance, and wholesale and retail trade.

Over 50% of working people in the borough are in professional, associate professional, technical, or managerial roles. The unemployment level is around 3%, lower than the figure for the southeast as a whole, but the borough is recorded as having the highest number of NEETs (people not in education, employment, or training) of any borough or district in Surrey, and there are relatively higher levels of unemployment in the wards of Preston, Redhill West, and Merstham. The average wage in the borough, at £629.50 per week, is higher than the southeast average, but is relatively low for Surrey – there has also been a slight drop in the average wage between 2010-2016, and further examination revealed this was caused by a large drop in women’s wages over that period, creating a clear economic gender gap.

- 2.13. On environmental sustainability, domestic electricity and gas consumption have decreased between 2010-2015, but at a slower rate than the national average, meaning the borough is becoming relatively less energy efficient over time. Despite this, per capita carbon dioxide emissions have reduced from 7.3 tonnes to 5.8 tonnes, lower than the UK average.
- 2.14. The borough contains one Special Area of Conservation (Mole Gap to Reigate Escarpment) protected under the EU Habitats Directive, two Local Nature Reserves (Earlswood Common and Reigate Heath), and four Sites of Special Scientific Interest (Banstead Downs, Chipstead Downs, Mole Gap to Reigate Escarpment, and Reigate Heath). Of these sites, Banstead Downs is the most at risk, with a condition considered to be 35% favourable, 26% recovering, and 39% declining. There are also 1,313 trees with Tree Protection Orders and 247 designated areas of ancient woodland. The majority of agricultural soil in the borough is of moderate or poor quality.
- 2.15. There are 13 Air Quality Management Areas within the borough, but the majority of these cover very small areas. The largest are located in central Redhill and southwest Horley. The overall concentration of nitrogen dioxide across the borough has decreased by 22.9% between 2006-2015. There are a number of potential sources of environmental noise in the borough, most notably Gatwick Airport (actually located just outside the borough, but still affecting residents) and the M23 and M25 motorways. Areas in the centre and south of the borough fall within flood zones 2 and 3, particularly in parts of Horley. The north of the borough does not fall with flood zones, but is at some risk of surface flooding.
- 2.16. A table setting out a wide range of social, economic, and environmental indicators, with comparators, trends, and a summary of key problems can be found in [Appendix C](#).

Key Sustainability Issues and Problems

- 2.17. The third section of the scoping report summarised the key sustainability issues facing the borough, and potential ways in which the Development Management Plan could address these issues. This section is replicated in full below.

Social Issues and Problems

- 2.18. The related plans, policies, and programmes at European, national, and regional levels oblige Reigate & Banstead to make the health and wellbeing of residents a priority and to provide healthy, safe, and inclusive communities with public spaces, active street frontages, and a mixture of uses. They also oblige the borough to provide an effective, reliable, safe, and sustainable transport system, with a focus on pedestrians and cyclists.
- 2.19. The baseline information shows a number of social problems and future challenges in the borough. Housing is one of the biggest problems, with current house prices at a very high level that makes them unaffordable to many people living or working in the borough. The average house price in the borough is currently 14 times the average annual wage in the borough. This may place additional pressure on road congestion and public transport infrastructure by forcing people to commute into the borough to work, or may have an economic impact by making it more difficult for local businesses to recruit workers. At the same time, there is a high level of underoccupation of houses, with over 70% of all households having at least one spare bedroom – this suggests that the distribution of housing space is not as efficient as it could be.
- 2.20. Health is another key problem, and is likely to become more severe in the coming years as the age profile of the borough becomes older. Currently, the healthy life expectancy of residents ends at around 70 years, but the number of over-70s is expected to increase sharply over the next two decades. This puts forward the possibility of an increasing need for health care for the elderly. In addition, there are relatively low levels of physical activity among both adults and children, and high numbers of overweight and obese people (although in line with the regional average). This may be contributing to the rising figures for coronary, cardiovascular, and stroke-related deaths among men. The borough also contains 4,000 people registered as physically disabled and 2,000 people suffering from dementia.
- 2.21. These health problems may partially be connected to the transport profile of the borough. Although a significant number of residents commute by train, the use of private cars is by far the most common way of getting around; the modal share of cycling is very low, possibly because of an unwelcoming street environment or topography; and only around half of residents walk three times a week or more.
- 2.22. Despite the general affluence of the borough, there are issues related to deprivation and poverty. The Index of Multiple Deprivation and other figures show more deprived parts of the borough clustering around Redhill, Merstham, Central Horley, and Preston. These areas display high levels of child poverty and childhood obesity, a relative lack of access to cars or vans making mobility more difficult in a borough that is dominated by private transport, and low levels of home ownership. At the same time, these areas have some of the densest populations in the borough, and breaking this link between density and deprivation will need to be a key aspect in the future sustainable development of the borough. The last few years has also seen a very

large increase in the number of households placed into temporary accommodation while on the housing list.

- 2.23. The lack of museum or archaeological archiving resources in the borough is less than ideal when it comes to maintaining and promoting access to the borough's historic and cultural assets, as archaeological finds must currently be preserved in facilities in other boroughs.
- 2.24. The primary social sustainability problems that need to be addressed in the borough appear to be those related to inequality and health. While many residents of the borough are affluent enough to afford high house prices and spare rooms, pockets of deprivation continue to exist in less fortunate parts of the borough. The borough also needs to encourage healthier ways of living and travelling that can counter obesity and related diseases, as well as planning the built environment to take into account the disabled, those with dementia and related mental disorders, and the increasing population of older adults with health issues.
- 2.25. The DMP can address some of these issues by identifying the type of housing needed in the borough and the ideal locations for such housing, as well as taking into account the need for further employment options and affordable housing in deprived areas – however, wider structural forces are likely to keep the price of housing high for the foreseeable future. To address health issues, the DMP can plan for safe and attractive open spaces throughout the borough, to encourage physical activity; as well as for an increase in the use of active transport modes through encouraging pedestrian- and cycle-friendly infrastructure in new developments. Policy on disability-friendly design, including designing for mental health issues like dementia as well as physical disabilities, could also be included. Health and education services in the borough are at or near capacity, and the needs of current and future residents of the borough in these respects could be considered through longer term development planning.

Economic Issues and Problems

- 2.26. The related plans, policies, and programmes commit the borough to pursuing sustainable economic growth, and to encouraging a knowledge-based economy to flower in the region. Investment in transport and digital infrastructure is expected to take place, along with the provision of suitable houses and programmes for providing local residents with the skills necessary to take part in the local and regional economy.
- 2.27. Generally speaking, the economy of the borough is in robust shape, although many residents make their livings by commuting to surrounding boroughs. However, there is a problem around falling wages, and more particularly a large gender inequality in wages. Men's average wages have risen slightly over the past few years, while women's have fallen dramatically – to the extent that they cancel out the rise in men's wages and create an overall average decrease in pay in the borough. The income inequality can also be represented geographically, with the socially deprived areas of

Merstham, Preston, and Redhill West again showing significantly lower average incomes than areas like Reigate Hill and Tadworth and Walton.

- 2.28. The social inequality highlighted above is also demonstrated in the economy of the borough as well, with higher levels of unemployment in Merstham, Preston, Redhill West, and South Park and Woodhatch than in other areas. This inequality also manifests itself in disparities of educational achievement, and in the high number of NEETs in the more economically deprived areas of the borough. This suggests that the economic prosperity of the borough is not extending to all wards, and access to education, skills, and training will need to be a priority to help reduce levels of unemployment in the most deprived areas. Knowledge-based businesses make up 29.3% of all enterprises in the borough, and the encouragement of this type of business is part of the Gatwick Diamond and Coast 2 Capital strategic plans, so ensuring residents have the skills and ability to participate in the knowledge economy will be vital.
- 2.29. Business survival rates are above the national and regional average, but relatively low in relation to the rest of Surrey for long-term survival. This suggests that progress is being made on nurturing an entrepreneurial business culture in the borough, but that continued support will be needed to ensure new businesses are resilient.
- 2.30. The DMP could address some of these issues through site allocations that emphasise the need for employment, educational, and social facilities in deprived areas as well as housing; and potentially through policies that call on developers to employ local apprentices in the construction process to provide skills to communities. The encouragement of a mix of uses (other than residential) in Sustainable Urban Extensions is also important to ensure that businesses have the opportunity to thrive and encourage creativity within the borough, rather than creating dormitory communities.

Environmental Issues and Problems

- 2.31. The related plans, policies, and programmes provide Reigate & Banstead with a large range of issues to consider. Environmental awareness is supposed to be suffused through all policies, not just those concerned directly with topics thought of as 'environmental'. There is a national requirement to improve energy efficiency by 20%; to provide 15% of all energy through renewables; to use renewable biofuels for 10% of all transport fuel; and to make all new buildings nearly zero carbon; all by the year 2020. On biodiversity and habitats, green and blue infrastructure networks are being increasingly encouraged as a new way to deal with the problem of biodiversity loss, while also allowing for greater valuation of the environment and the ecosystem services it provides. The borough will also be required to continue to protect the Mole Gap to Reigate Escarpment SAC, the SSSIs in the borough, local nature reserves and areas of ancient woodland; and should aim to protect, enhance, and increase the coverage of forested and woodland areas. The Surrey Hills AONB and AGLV will also need to be protected when considering planning and development; and impacts on rural and green belt land, particularly "the best and most versatile agricultural

land” (as the NPPF paragraph 112 describes it), will also have to be taken into account.

- 2.32. A waste framework that priorities reduction, then re-use, and then recycling should be implemented, as well as attempts to reduce the proportion of waste sent to landfill. There is a national obligation to drastically reduce the emission of carbon dioxide and other greenhouse gases, with an aim to reduce emissions by 80% on 1990 levels by 2050. The borough must also try to increase sustainable transport by encouraging greater levels of walking and cycling for shorter journeys of five miles or less. Finally, there is a requirement in the plans, policies, and programmes to manage the impacts of environmental noise and air pollution through mapping and management plans.
- 2.33. The baseline information identifies that Reigate & Banstead is doing well at reducing greenhouse gas emissions, but continues to face a number of more worrying trends. Levels of overall energy use are reducing, but at a slower rate than the national average, raising the possibility of the borough being left behind and possibly losing its position as one of the lower per capita emitters of greenhouse gases in Surrey. A key area for action here is transport emissions, which make up the largest proportion of current emissions. The borough also does not produce a significant amount of its own renewable energy – while this is not a huge problem, as energy consumed in the borough does not need to be produced here as well, focusing on ways to make the most of sustainable energy resources within existing constraints could be an important area to develop.
- 2.34. In addition to these wider issues, a number of particular sites face specific environmental pressures of various kinds. The Mole Gap to Reigate Escarpment SAC faces pressures from cultivation and groundwater pollution and recreation, while of the four SSSIs in the borough, only Reigate Heath can be said to be in a good condition, with three-quarters of its land considered ‘favourable’. In addition to this, none of the major bodies of groundwater or surface water in the borough are in excellent condition – with the groundwater suffering from quantity issues, and the surface water showing poor ecological quality. These water bodies also pose a flooding risk to large parts of the south of the borough, and some areas in the centre.
- 2.35. Beyond these designated areas, the wider network of green infrastructure and landscape in the borough will need to be addressed. Biodiversity requires networks of connected natural spaces in order to flourish, and with increasing pressure to use land for housing, it will be important to ensure that such a network continues to exist – a green infrastructure approach may also make it possible to examine ways in which to increase biodiversity within the urban area. The growth of housing also poses potential problems to the landscape character of the borough. Careful design and location of housing will be required to avoid suburban sprawl beyond the boundaries of the existing urban areas; and to existing uses of rural land, such as food production and other agricultural and forestry uses. These competing demands will need to be carefully balanced, without falling too heavily in favour of turning land over to housing developments, whilst also recognising that local housing needs must be met.

- 2.36. The town centres, particularly in the south and centre of the borough, also suffer from light pollution at night and environmental noise impacts from Gatwick Airport and the motorways, and are also shown by heat mapping to require large amounts of energy. The heat mapping also shows that rural properties and large individual developments like hospitals are using significant amounts of energy. Although air pollution throughout the borough is waning, there remain a number of AQMAs that will need to be addressed to provide cleaner, healthier air for residents – however, in many cases, the source of the problem is background traffic from areas outside the borough, making this difficult for the council to control. In terms of waste, the borough is one of the better performers among local authorities, but could still do better, with almost 50% of waste still going to landfill.
- 2.37. Flood risk is also a concern in the borough, with much of the land south of the M25 susceptible to flooding. This problem is likely to increase in severity in the coming years as the effects of climate change are felt more greatly. As development will need to be steered away from areas of greatest flood risk to protect people and property, this will place additional pressures on the remaining developable land in the borough.
- 2.38. Policies in the DMP can help to address these issues by focusing on the need for new developments to contribute to green infrastructure, sustainable transport modes, and renewable energy production where possible. Following national policy, the DMP can also encourage development away from areas of potential flood risk, and call for mitigation measures for development in areas of potential health risk such as those with high levels of noise or air pollution. Site allocations in the DMP can help to protect important landscapes in the borough and prevent sprawl through careful site selection. A Habitats Regulations Assessment accompanying the Sustainability Appraisal of the DMP will assess the impact of proposed developments on protected sites and ensure that, where necessary, appropriate measures are provided to avoid adverse impacts .

The Sustainability Appraisal Framework

- 2.39. The fourth section of the scoping report set out the framework that will be used for the sustainability appraisal. The framework to be used for the appraisal is based on a pre-existing set of objectives called the East Surrey Local Authority Sustainability Objectives. These sixteen objectives have been developed, consulted on, and refined over a number of years. They provide a robust framework for sustainability appraisal and allow for continuity and better cross-boundary alignment of sustainability appraisals across the east Surrey region.
- 2.40. The East Surrey Sustainability Objectives were developed and are used by Reigate & Banstead Borough Council, Mole Valley District Council, Elmbridge Borough Council, Tandridge District Council, and Epsom & Ewell Borough Council. In refining and developing the most recent version of the objectives (which reduced their number to sixteen), consultation was undertaken with Historic England, Environment Agency,

Natural England, Surrey County Council, mayor of London/Greater London Authority, and the London Boroughs of Kingston, Sutton, Merton, Croydon, and Richmond Upon Thames.

2.41. The objectives are laid out in figure 2 below, and are replicated with guiding questions in [Appendix D](#).

Number	Objective
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 conserve and enhance archaeological, historic, and cultural assets and their setting
4	To reduce the need to travel, encourage sustainable transport options and improve accessibility to all services and facilities
5	To make the best use of previously developed land and existing buildings
6	To support economic growth which is inclusive, innovative, and sustainable
7	To provide for employment opportunities to meet the needs of the local economy
8	To reduce greenhouse gas emissions and move to a low carbon economy
9	To use natural resources prudently
10	To adapt to the changing climate
11	To reduce flood risk
12	To improve the water quality of rivers and groundwater, and maintain an adequate supply of water
13	To reduce land contamination and safeguard soil quality and quantity
14	To ensure air quality continues to improve and noise and light pollution are reduced
15	To protect and enhance landscape character
16	To conserve and enhance biodiversity

Figure 2: Sustainability Framework Objectives

Consultation

2.42. The first draft of the scoping report was consulted on between 2 December 2016 and 6 January 2017. The full list of consultees included: Historic England, Natural England, Environment Agency, Surrey County Council, West Sussex County Council, Elmbridge Borough Council, Tandridge District Council, Mole Valley District Council, Epsom & Ewell Borough Council, London Borough of Croydon, London Borough of Sutton, Crawley Borough Council, Horsham District Council, and Mid Sussex District Council.

2.43. Consultees were asked the following eight questions about the report, and encouraged to add comments about any other aspect of the report:

- Have the relevant policies, plans, programmes or sustainability objectives been correctly identified?
- Are there any other policies, plan, programmes or sustainability objectives relevant to Reigate & Banstead which should be included?

- Do you agree the baseline information collected is relevant, accurate and in sufficient detail to support the plan?
- Are there any other relevant pieces of baseline information for Reigate & Banstead that the scoping report has not identified?
- Do you agree that all sustainability issues facing the borough have been identified?
- Are there any other pressing sustainability issues or opportunities that the local plan could help address?
- The East Surrey sustainability objectives have already been subject to consultation with statutory consultees; however, please let us know if you have any comments on them.
- Are the sustainability issues adequately reflected in the sustainability appraisal objectives?

2.44. Seven responses were received to the consultation. There were substantive responses from Historic England, Natural England, Environment Agency, and Surrey County Council. The responses, and the impact they had on the final scoping report draft, are summarised in [Appendix E](#). Elmbridge Borough Council, Tandridge District Council, and Mole Valley District Council responded to say that they had no substantive comments to make.

3. Sustainability Appraisal Methodology

Development of Alternatives

- 3.1. The Development Management Plan objectives emerged during the preparation of the Regulation 18 consultation document. As the purpose of the Development Management Plan is to facilitate the implementation of the strategic priorities for the borough identified in the Core Strategy, the objectives are similar to those found in the Core Strategy. These objectives were evaluated in the Regulation 18 sustainability appraisal, and based on representations received during the consultation, it has been decided to keep the same set of objectives for the Regulation 19 stage.
- 3.2. A number of potential policy approaches were developed and evaluated during the Regulation 18 stage. Preferred choices were then included and consulted upon in the Regulation 18 consultation document. These preferred policy options have been further refined in response to representations received during the consultation process, discussions with statutory consultees and other local authorities as part of the duty to cooperate, and informal consultations with local councillors. It is these preferred policy options that are appraised in this report.
- 3.3. The only instance in which policy options have been re-appraised, rather than only appraising the finished policy, is in the case of airport parking. This is in response to a representation to the Regulation 18 consultation, which noted some confusing and inconsistent elements to the policy option appraisal for this issue in the Regulation 18 sustainability appraisal. In addition, a number of new policies have emerged since the Regulation 18 consultation, and in these instances a full appraisal of potential policy options has been included in this report.
- 3.4. Potential urban development sites have been identified from a number of sources. In the Regulation 18 sustainability appraisal, 32 sites were evaluated, based on information from the Council's Strategic Housing Land Availability Assessment (SHLAA) technical work. A number of additional sites were promoted through the Regulation 18 consultation process, and 19 sites identified in such a manner are appraised in this report. An additional 10 potentially viable sites were identified through the Council's Housing and Employment Land Availability Assessment (HELAA), and these sites are also appraised in this report. From these sources, a total of 66 potential urban site allocations have been appraised.
- 3.5. At the Regulation 18 stage, 33 sites were evaluated as potential Sustainable Urban Extensions, and 14 sites evaluated as potential Strategic Employment Sites. No additional sites have been identified through the Regulation 18 consultation.

- 3.6. Since the Regulation 18 consultation document was published, work has been undertaken to identify potential sites to safeguard beyond the end of the current plan period, in line with national policy on this issue. Five potential spatial options have been developed by officers for safeguarding land, based on the possibilities of safeguarding land for small, medium, or large urban extensions, or medium or large standalone settlements. These five options have been appraised in this report. In addition, 37 potential safeguarding sites have been identified from previous technical work undertaken for the Core Strategy and Development Management Plan Regulation 18 consultation document. These sites have been appraised in this report.
- 3.7. A Traveller Site Land Availability Assessment was undertaken to identify potentially suitable land for pitches. The vast majority of sites identified in that work were unsuitable due to various constraints or unavailable, leaving eight sites to be appraised in this report.
- 3.8. During the processes of developing the Core Strategy, the Regulation 18 consultation document, and the Regulation 19 Development Management Plan document, a wide enough range of spatial options, objectives, policy approaches, and potential site allocations have been appraised for this to be considered a robust and sound approach to planning for the borough.

Appraisal Process

- 3.9. Each objective, policy, spatial option, and potential site allocation has been evaluated against the same sixteen objectives taken from the East Surrey Local Authority Sustainability Objectives discussed in paragraphs 2.39-2.41 above. A number of guiding questions exist for each objective to aid decision making, and these can be seen in [Appendix D](#).
- 3.10. For each sustainability objective, the objective, policy, spatial option, or site allocation being appraised was awarded one of five scores, as seen below in figure 3.

++	This is expected to have a very positive impact on achieving the sustainability objective
+	This is expected to have a positive impact on achieving the sustainability objective
0	This is expected to have a neutral impact on achieving the sustainability objective
-	This is expected to have a negative impact on achieving the sustainability objective
--	This is expected to have a very negative impact on achieving the sustainability objective

Figure 3: Sustainability appraisal scoring method

- 3.11. An explanation for each score is given in the individual assessment tables, which can be found in Appendices F to N. Where applicable, suggestions have also been made as to possible mitigation measures that could reduce negative impacts or accentuate positive ones.
- 3.12. No attempt has been made to develop an 'overall' scoring system for each site, as it was considered that reducing the process to a single quantitative measure would be an inaccurate representation of the complexities of considering sustainability across the three dimensions of the social, economic, and environmental. A site could, for example, score positively on a wide range of objectives, but have such a negative impact on one or two objectives that it is considered a highly unsustainable choice when considered qualitatively. Consequently, each appraisal should be considered in its entirety, and in relation to all other appraisals within each category, when being used to aid decision-making on the Development Management Plan.
- 3.13. Appraisal and scoring for sites was done through desktop research, using GIS systems, previously developed constraints assessments where available, and existing planning documents – most notably the [Borough Wide Landscape and Townscape Character Assessment](#) (2008). All assessments have been primarily undertaken by a single officer in an attempt to maintain consistent scoring across all the appraisals within each category, and across all categories.
- 3.14. In a few cases where clear information is not available, or where a sustainability objective has no clear applicability to an appraisal, this has been explained in the text of the assessment table and noted with a question mark rather than a score.
- 3.15. For some objectives, there are clear data points that can be used in the appraisal. For example, when assessing effects on heritage for objective 3, an officer can use GIS systems to see what listed buildings or other heritage designations are in the proximity of a potential site allocation, and can then judge how likely these designations are to be affected by a development of the proposed size on the potential site. For other objectives, however, assessments are more subjective – when assessing the potential effects on health and wellbeing for objective 2, an officer can consider the likelihood of new residents in a development to walk or use a car to access services, the proximity to parks or other open spaces or leisure facilities, the proximity to GP services or pharmacies, and the proximity to potential sources of environmental noise or air pollution. But there is no single, relatively clear measure, designation, or GIS layer against which a development's potential impact on health and wellbeing can be compared in the same way as it can to a map of heritage designations. In some instances then, some subjectivity in the assessment must be accepted, but the accompanying text for each appraisal aims to make clear why a particular score has been awarded.

4. Sustainability Appraisal Assessments

- 4.1. The following sections provide the overall assessment tables for each category that was appraised, along with a brief commentary on the outcomes of the assessment. The full assessment tables for each individual objective, policy, spatial option, or potential site allocation can be found in Appendices F to N.

Development Management Plan Objectives

- 4.2. In total, 23 objectives were appraised covering the three key themes of the Development Management Plan. The majority of objectives scored well, with 19 of the objectives receiving no negative scores at all.
- 4.3. Of the remaining objectives, there were concerns that SC6 on parking might encourage a greater surface coverage of hard standing in the borough, and that while it might encourage some use of sustainable transport, it was also encouraging continued use of cars. SC10 on landscape was thought to have some potential to hinder renewable energy development in the borough, due to the impact of wind energy on landscape character. And PS1 and PS2 on gypsies, travellers and travelling showpeople, and cemetery provision were expected to see greenfield sites used to achieve them rather than brownfield land.
- 4.4. There was a relatively high amount of missing or unknowable data for this appraisal, in situations where the specific choice of site will determine the impact on a sustainability objective, rather than the general principle of the Development Management Plan objective itself.
- 4.5. The results of the assessment can be seen in the table below. The individual assessments can be seen in [Appendix F](#).

Development Management Plan Objectives																	
Objective	Sustainability Objective																Comments
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	
PE1 - Safeguard existing employment land and premises to ensure that there is adequate space for businesses to locate in the borough	0	+	0	+	+	++	++	?	?	0	0	0	+	?	+	0	This objective will have positive impacts on the economic objectives of the framework, encouraging businesses to continue to locate in the borough and provide employment opportunities. By providing employment within the borough, it may also reduce the need to travel.
PE2 - Provide flexibility for local businesses to start up, grow, diversify, and prosper	0	+	0	+	0	++	++	?	?	0	0	0	0	?	0	0	This objective will have positive impacts on the economic objectives of the framework, encouraging businesses to continue to locate in the borough and provide employment opportunities. By providing employment within the borough, it may also reduce the need to travel. Encouraging new businesses to start can also potentially address issues of social deprivation and exclusion.
PE3 - Help new development to deliver jobs and skills benefits for local people	0	+	0	+	0	++	++	?	?	0	0	0	0	?	0	0	This objective will have positive impacts on the economic objectives of the framework, encouraging businesses to continue to locate in the borough and provide employment opportunities. By providing employment within the borough, it may also reduce the need to travel. Encouraging new businesses to start and residents to learn new skills can also potentially address issues of social deprivation and exclusion.

PE4 - Protect the vitality and viability of our town centre shopping areas	0	+	0	++	+	++	++	+	0	0	0	0	0	0	0	0	Encouraging the continued vitality of town centres will have positive impacts on the economy of the borough and ensure town centres continue to provide employment opportunities for residents. The focus on compact, accessible town centre locations can also reduce the need to travel and promote healthy, low carbon transport practices such as walking.
PE5 - Protect the viability of smaller scale but vital local shopping areas	0	+	0	+	+	+	+	+	0	0	0	0	0	0	0	0	Encouraging the continued viability of local centres will have positive impacts on the economy of the borough and ensure local centres continue to provide access to services and some employment opportunities for residents. This can also reduce the need to travel and can promote healthy, low carbon transport practices such as walking.
PE6 - Ensure that both town and local centres are resilient and able to respond to future changes	0	0	0	+	+	++	+	0	0	0	0	0	0	0	0	0	Encouraging the continued resilience and flexibility of town and local centres will have positive impacts on the economy of the borough and ensure town centres continue to provide employment opportunities for residents. The focus on compact, accessible town centre locations can also reduce the need to travel.
SC1 - To ensure that new development makes the best use of land whilst also being well designed and protecting and enhancing local character and distinctiveness	+	+	++	0	++	0	0	+	++	+	0	0	+	+	++	0	This objective will help to deliver an appropriate amount of well-designed, healthy housing, with a focus on previously developed land. Well-designed housing can protect landscape character and heritage assets, and can be designed to reduce energy consumption and contain flood protection measures.

<p>SC2 - to ensure an appropriate mix of housing types and sizes, offering a good standard of living to future occupants</p>	++	+	0	0	0	++	0	+	0	0	0	0	0	+	+	0	<p>This objective has a very positive impact on the provision of housing in the borough, and ensuring suitable housing is available to people on a range of incomes can reduce stress and improve health outcomes. Appropriate types of housing can also protect landscape character, minimise the impacts of air and noise pollution through good design, and possibly provide a greater number of smaller houses that may use less energy.</p>
<p>SC3 - To minimise the impacts of development, and the development process on local residents and local amenity</p>	0	++	0	0	0	0	0	0	0	0	0	0	+	++	0	0	<p>This objective will promote the health of residents and potentially improve air quality and reduce the risk of land contamination.</p>
<p>SC4 - Protect the most valuable open space within the urban areas</p>	0	++	+	0	0	0	0	0	0	+	++	+	0	++	++	++	<p>Protecting open spaces in the borough contributes to public health by encouraging walking and, to some extent, cycling. It also reduces flood risk due to the soft landscaping of open spaces, and helps to protect landscape, heritage, and biodiversity assets.</p>
<p>SC5 - Encourage the provision of open space as part of new developments, and where appropriate new outdoor sport and recreation provision</p>	+	++	0	+	0	0	0	0	0	+	++	+	0	++	+	+	<p>Providing new open spaces in the borough contributes to public health by encouraging walking and, to some extent, cycling. It also reduces flood risk due to the soft landscaping of open spaces, and helps to protect landscape, heritage, and biodiversity assets.</p>

<p>SC6 - Require new developments to provide adequate parking, whilst recognising the need to encourage sustainable transport choices, particularly in the most accessible locations</p>	0	+	-	+	0	0	0	?	0	-	-	0	0	?	-	-	<p>This objective may lead to the introduction of more parking spaces, which can undermine heritage assets, landscape character, and biodiversity, and could increase flood risk by increasing the amount of hard surfaces in the borough. However, the objective does recognise the need to encourage sustainable transport options as well, which may reduce car use to some extent and promote healthier alternatives like cycling and walking.</p>
<p>SC7 - Ensure new developments are served by safe and well-designed access for vehicles, pedestrians, and cyclists</p>	0	+	0	+	0	0	0	+	0	0	0	0	0	+	0	0	<p>This objective will encourage the use of walking and cycling by making them safer, promoting healthy living and reducing carbon emissions and air pollution.</p>
<p>SC8 - Encourage new development to incorporate passive and active energy efficiency measures and climate change resilience measures and renewable energy technologies</p>	0	0	0	0	0	0	0	++	++	++	++	0	0	+	?	+	<p>This objective will reduce energy consumption and carbon emissions, improve air quality somewhat, and reduce flood risk by including climate change resilience measures in new developments.</p>
<p>SC9 - Direct development away from areas at risk of flooding, and ensure all developments are safe from flood risk and do not increase flood risk elsewhere or result in a reduction in water quality</p>	+	++	0	0	0	0	0	0	0	++	++	+	0	0	0	0	<p>This objective reduces flood risk, which also contributes to water quality, health and quality of life, and enables new housing to be built.</p>

<p>SC10 - Ensure new development protects, and enhances wherever possible, the borough's landscapes and biodiversity interest features, providing the highest degree of protection to international and nationally designated areas</p>	?	+	+	0	0	0	0	-	-	+	+	0	0	0	++	++	<p>Protecting landscape and biodiversity features has a strong positive impact on the landscape and biodiversity objectives of the sustainability framework, and can also help to preserve heritage assets and reduce flood risk by maintaining a greater percentage of soft landscaping. However, the impact of landscape protection on the ability to deliver new houses is contentious, and landscape protection can sometimes be incompatible with the installation of renewable energy technologies.</p>	
<p>SC11 - Maximise the contribution of new development to a comprehensive green infrastructure network across the borough</p>	0	++	+	+	0	0	0	+	0	++	++	0	0	+	++	++	<p>A green infrastructure network has a strong positive impact on the landscape and biodiversity objectives of the sustainability framework, and can also help to preserve heritage assets and reduce flood risk by maintaining a greater percentage of soft landscaping. As green infrastructure networks prioritise connectivity and encourage walking and cycling, they can also have positive impacts on reducing the need to travel, reducing carbon emissions, and public health.</p>	
<p>SC12 - Control development in the Green Belt to safeguard its openness, and where possible enhance its beneficial use</p>	0	0	0	+	++	0	0	0	0	0	0	0	0	++	0	++	0	<p>This objective encourages the use of previously developed land in urban areas by reducing the amount of greenfield land that can be built on. The greenbelt also contributes to landscape protection in the borough and helps to preserve some of the more valuable soils.</p>
<p>SC13 - Conserve and enhance heritage assets across the borough, supporting their</p>	0	0	++	0	+	0	0	0	0	0	0	0	0	0	0	+	0	<p>This objective will protect heritage assets across the borough, and encourage their reuse for appropriate purposes.</p>

continuing viable use and cultural benefits																	
PS1 - Identify a local target for Gypsy, Traveller, and Travelling Showpeople sites, and allocate sites to achieve this target	++	++	0	?	-	0	0	0	0	0	+	+	?	0	?	?	This objective will ensure that enough housing is provided for these communities, and may reduce overcrowding and improve living conditions. However, this objective is unlikely to prioritise the use of previously developed land.
PS2 - Ensure future cemetery and/or crematorium provision is located consistent with sustainability principles	0	0	0	+	-	0	0	+	0	0	0	0	?	0	?	?	Sustainable location of these facilities can decrease the need to travel and reduce carbon emissions, although they are likely to be located on greenfield rather than previously developed sites.
PS3 - Allocate sites for development across the borough consistent with the Core Strategy and sustainability principles	++	++	+	+	++	+	+	?	0	+	++	0	?	?	?	?	Allocating sites in line with the Core Strategy and sustainability principles will see land provided for housing and employment uses, open space provided to contribute to residents' health, consideration of how to reduce the need to travel and encourage walking, cycling and public transport use, and the reduction of flood risk by locating developments away from sequentially unpreferable areas.
PS4 - Plan for improvements to existing infrastructure and services and/or the provision of new infrastructure and services, to meet the needs created by new development	+	++	0	++	0	0	0	+	0	++	++	+	0	0	0	0	This objective will provide the infrastructure necessary to enable new housing development and will provide the services needed to cater for the health of the population while reducing the need to travel long distances to these services. It can also reduce flood risk, improve water quality, and reduce carbon emissions by providing for the provision of SUDS, sewerage, and renewable energy.

Potential Policy Options

Airport Parking

- 4.6. A representation received during the Regulation 18 Development Management Plan consultation noted some problems with the sustainability appraisal for airport parking policy options. Two different appraisals had been undertaken – one for ‘Gatwick Airport Car Parking’ and one for ‘Airport Parking’. No clear explanation was given as to the difference between these two assessments, or why two assessments had been undertaken rather than one.
- 4.7. The Gatwick Airport Car Parking appraisal explored two options: to not have a policy on the issue and rely on the Core Strategy and National Planning Policy Framework to make decisions on airport car parking proposals; and to have a specific policy to resist airport car parking within the borough. The Airport Parking appraisal also explored two options: to not have a policy on the issue, and to retain the existing policy on this issue from the 2005 Borough Local Plan, Policy Em 11. It was unclear why the two appraisals explored different sets of options. Furthermore, the option of not having a policy, despite ostensibly being identical for both appraisals, had been scored differently – again, with no clear explanation as to the difference between them.
- 4.8. Consequently, it has been decided to undertake a second, more comprehensive appraisal of airport parking policy options in this sustainability appraisal. This appraisal supports the choice of policy in the Development Management Plan Regulation 19 document.
- 4.9. Three options have been explored in this appraisal, essentially combining the two assessments undertaken at the Regulation 18 stage. Option 1 is to not have a policy on this issue, and rely on the Core Strategy and National Planning Policy Framework. This option is essentially a relaxation of the current policy on airport parking, which encourages on-airport parking, with some strict exceptions. Option 2 is to retain that current policy from the 2005 Borough Local Plan. Option 3 is to have a more restrictive policy than at present, by introducing a policy that specifically seeks to restrict airport parking within the borough.
- 4.10. The chosen option of these three is Option 3. Options 2 and 3 were shown to be clearly preferable in terms of sustainability to Option 1. Option 1 scored negatively on six objectives, relating to air quality, noise pollution, traffic congestion, sustainable travel, previously developed land, and landscape character, and scored positively on only one objective relating to employment. Objectives 2 and 3 scored negatively on none of the objectives, and scored positively on five of them, relating primarily to the issues on which Option 1 scored negatively. However, the positive effects of Option 2 stemmed from the fact that it largely restricts airport parking in the borough except in very special circumstances. Option 3, on the other hand, completely restricts airport

parking within the borough, and therefore scores even more positively on the same objectives, and is the chosen option.

- 4.11. The results of the assessment can be seen in the table below. The individual assessments can be seen in [Appendix G](#).

New Policies

- 4.12. A number of new policies are contained in the Regulation 19 Development Management Plan that have not previously been appraised. For each of them, a range of potential policy options have been explored and appraised.
- 4.13. For policy DES7 (Affordable Housing), the chosen option is Option 2, because this allows the Development Management Plan to contain an updated policy that changes the thresholds and proportions of affordable housing required, in order to maximise the amount of affordable housing brought forward in the borough.
- 4.14. For policy DES8 (Specialist Accommodation), two appraisals were undertaken, one for caravans and one for older people's accommodation. In both cases, the chosen option was Option 2, to have a specific policy on these issues. This ensures that the need for these types of accommodation are suitably taken account of and catered for in the plan.
- 4.15. For policy DES9 (Community Facilities), the chosen option is Option 2. Having an updated policy on community facilities in the Development management Plan provides more details about the circumstances under which the loss of community facilities will be considered acceptable, providing additional certainty to developers and planners.
- 4.16. For policy CCF1 (Climate Change Mitigation), the chosen option is Option 2 and 3, to include specific policies on renewable energy provision and energy and water efficiency. It was felt that the existing Core Strategy policies on sustainable development and construction are strong, but do not suitably cover the issues raised in Options 2 and 3, and that Options 2 and 3 would complement the Core Strategy policy and strengthen climate change mitigation in the borough.
- 4.17. For policy INF1 (Infrastructure), the chosen option is Option 2. A specific policy in the Development Management Plan will allow for more detail on what is expected of developers in terms of infrastructure provision, providing additional certainty.
- 4.18. For policy MLS2 (Safeguarding Land for Development Beyond the Plan Period), the chosen option is Option 3, to adopt a supply-led approach to safeguarding land beyond the current plan period. Choosing not to safeguard land may lead to a situation in which the borough faces a housing land shortfall at the end of the plan period, which could lead to planning by appeal and a number of negative impacts on biodiversity, landscape, and heritage assets. Choosing not to safeguard land may also not be considered compliant with national policy by an Inspector. The second option considered was to safeguard land equivalent to a certain number of years of

housing land supply, for example, ten years of housing land supply. This would be preferable to Option 1, but may lead to the safeguarding of unsustainable sites in order to meet an arbitrary target if sustainable sites do not provide the right number of years of housing land supply. Consequently, it was felt that a supply-led approach would be the most sustainable option – this would involve the assessment and identification of the most sustainable sites for safeguarding, regardless of the number of years of housing land supply they provide.

- 4.19. The results of the assessments can be seen in the tables below. The individual assessments can be seen in [Appendix G](#).

Airport Parking Policy Options																	
Option	Sustainability Objective																Comments
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	
Option 1: Do not have a specific policy - rely on Core Strategy/NPPF	0	-	0	-	-	0	+	-	0	0	0	0	0	-	-	0	This option would not allow locally specific control over the location of airport car parking, and would likely lead to an increase in airport car parking in the borough. Additional parking is likely to lead to additional car trips to the airport, and would not support the current Gatwick Airport strategy of achieving a 40% modal share of sustainable transport journeys to the airport. The additional car trips would have a negative impact on air quality, traffic congestion, and noise pollution, and additional land used for car parking would damage landscape or townscape character, and potentially be a poor use of previously developed land. However, this option would potentially provide some additional employment within the borough.
Option 2: Retain existing BLP policy which allows airport car parking provision in the borough as long as it is consistent with other policies	0	0	0	+	+	0	0	+	0	0	0	0	0	+	+	0	This option would see the majority of airport car parking within the boundary of Gatwick Airport itself. This would assist Gatwick Airport in achieving the target of 40% modal share for sustainable transport journeys to the airport, and thus would aid in reducing the amount of car journeys made. This would have positive impacts on air quality, traffic congestion, and noise pollution, as well as allowing previously developed land to be put to better use than car parking.

Option 3: Have specific policy that seeks to resist airport car parking provision in the borough	0	0	0	++	++	0	0	++	0	0	0	0	0	++	++	0	This option would likely see all airport car parking within the boundary of Gatwick Airport itself. This would assist Gatwick Airport in achieving the target of 40% modal share for sustainable transport journeys to the airport, and thus would aid in reducing the amount of car journeys made. This would have positive impacts on air quality, traffic congestion, and noise pollution, as well as allowing previously developed land to be put to better use than car parking.
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Affordable Housing Policy Options																	
Option	Sustainability Objective																Comments
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	
Option 1 - rely on Core Strategy policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	This approach would maintain current levels of affordable house provision in the borough, having a neutral impact.
Option 2 - have an updated policy on affordable housing	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	This approach would maximise the level of affordable housing provision in the borough, ensuring greater access to appropriate housing.

Caravan Policy Options																	
Option	Sustainability Objective																Comments
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	
Option 1 - rely on Core Strategy national planning policies	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Relying on national policy for this topic may mean that planning for caravans takes place on an ad hoc basis, and the need for this kind of accommodation is not adequately catered for.
Option 2 - have a specific policy on caravans	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Including a policy in the DMP on caravans can ensure that this kind of accommodation is adequately catered for.

Older People's Accommodation Policy Options																	
Option	Sustainability Objective																Comments
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	
Option 1 - rely on NPPF	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Relying on national policy for this topic may mean that planning for older people's accommodation takes place on an ad hoc basis, and the need for this kind of accommodation is not adequately catered for.
Option 2 - have a specific policy on older people's accommodation	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Including a DMP policy on this topic could ensure that older people's accommodation is suitably catered for in the borough, and the provision of suitable housing for older people could also increase wellbeing.

Community Facilities Policy Options																	
Option	Sustainability Objective																Comments
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	
Option 1 - rely on Core Strategy policy	0	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	The Core Strategy policy on community facilities provides potential benefits for sustainable travel, the use of previously developed land, social interaction and its attendant health benefits, and the protection of cultural assets. However, the current policy is light on detail, as it forms a sub-clause in a wider policy.
Option 2 - have an updated policy on community facilities	0	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	A dedicated community facilities policy in the DMP would have the same benefits, but would allow for more specificity over the requirements that must be met for the loss of a community facility to be acceptable, and would therefore provide greater certainty to developers and planners.

Climate Change Mitigation Policy Options																	
Option	Sustainability Objective																Comments
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	
Option 1 - rely on Core Strategy policies on sustainable development and construction	0	+	+	+	+	0	0	+	+	+	+	+	0	+	0	+	This approach would see a number of positive impacts on the environment, as the existing Core Strategy policies are wide-ranging and ambitious, and aim to reduce the environmental impact of development in a number of areas. However, as there is no suggestion of replacing these policies, the benefits it provides will take place regardless.

Option 2 - have a specific policy on renewable energy generation	0	0	0	0	0	0	0	+	++	++	0	+	0	0	+	0	0	This approach will have a strong impact on reducing greenhouse gases, and may also help to improve air quality and reduce flood risk - this would be a strong approach to climate change mitigation, and would have a positive cumulative impact with the existing Core Strategy policies.
Option 3 - have a specific policy on energy and water efficiency	0	+	0	0	0	0	0	0	++	++	0	+	++	0	+	0	0	This approach will also have a strong impact on reducing greenhouse gases, and could help to maintain an adequate supply of water and increase wellbeing in the borough - this would be a strong approach to climate change mitigation, and would have a positive cumulative impact with the existing Core Strategy policies.
Option 4 - rely on other DMP policies to cover climate change mitigation adequately	0	0	0	0	0	0	0	0	+	+	0	0	0	0	0	+	0	Only one other DMP policy will have a strong impact on climate change mitigation, which is the encouragement of sustainable transport. This approach would not see renewable energy or greater energy efficiency actively encouraged.

Infrastructure Policy Options																		
Option	Sustainability Objective																Comments	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16		
Option 1 - rely on Core Strategy policy	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	The existing Core Strategy policy requires infrastructure to be provided in a timely manner, thus enabling new development. The policy also contains clauses on community facilities, leisure facilities, and green infrastructure, although these issues are also touched on by other DMP policies.
Option 2 - have an updated policy on infrastructure	+	0	0	0	0	0	0	0	0	0	+	+	0	0	0	0	0	An updated DMP policy on infrastructure would perform a similar function in terms of enabling development, but could also specify requirements for particular kinds of infrastructure relating to flooding and water treatment, and can provide more details about what will be expected in terms of infrastructure delivery.

Safeguarding Land for Development Beyond the Plan Period Policy Options																	
Option	Sustainability Objective																Comments
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	
Option 1 - do not safeguard land	-	0	-	0	0	0	0	0	0	0	0	0	0	0	-	-	Failing to safeguard land beyond the end of the plan period could have serious implications. It is arguably not compliant with national policy, but it would also leave open the possibility that at the end of the current plan period the borough faces a shortfall in housing land, which could lead to planning by appeal and its attendant impacts on issues like biodiversity, heritage assets, and landscape.
Option 2 - safeguard land for a particular time period after the end of the current plan period	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Safeguarding land for a given time period, such as five or ten years beyond the end of the current plan period would avoid many of the major problems of option 1. However, by setting an arbitrary target for years of housing land supply to safeguard, it risks potentially encouraging the safeguarding of unsustainable sites simply to meet the target.
Option 3 - safeguard land using a supply-led approach	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	A supply-led approach to safeguarding land would mean evaluating sites and choosing those which would be appropriate for safeguarding, regardless of the number of years housing supply this would provide at the end of the plan period. This avoids the negative impacts of option 1, while also ensuring that only sites that would be sustainable locations for housing are safeguarded at this point.

Development Management Plan Policies

- 4.20. A total of 44 policies were assessed for inclusion in the Development Management Plan. The majority of these policies scored neutrally or positively, with very few negative scores for any of the policies. Policy options were assessed at the Regulation 18 stage, and the Council's earlier DMP sustainability appraisal report should therefore be read in conjunction with this one.
- 4.21. Policies RET5, RET6, and TAP2 were all judged to restrict certain kinds of employment use, and therefore scored negatively on the objective related to that issue, although they scored positively on many other objectives. Policy NHE1 scored negatively on the reduction of greenhouse gases objective, as it restricts development of renewable energy to some extent. Policies DES2 and GTT1 scored negatively on the objective to make best use of previously developed land – DES2 encourages (in certain circumstances) development of back garden land, which is not considered previously developed, and GTT1 sets out allocations for gypsy, traveller, and travelling showperson sites, (but no suitable available sites that are on previously developed land have been identified).
- 4.22. The results of the assessment can be seen in the table below. The individual assessments can be seen in [Appendix H](#).

DMP Policies																	
Policy	Sustainability Objective																Comments
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	
EMP1 - Principal Employment Areas	0	0	0	0	++	+	+	0	0	0	0	0	+	0	+	+	This policy encourages industrial and warehousing uses to locate in areas that are already allocated for such uses, protecting the landscape and biodiversity of the rest of the borough and providing for employment and a growing economy.
EMP2 - Local Employment Areas	0	0	0	0	++	+	+	0	0	0	0	0	+	0	+	+	This policy encourages employment uses to locate in areas that are already allocated for such uses, protecting the landscape and biodiversity of the rest of the borough and providing for employment and a growing economy.
EMP3 - Employment Development Outside Employment Areas	0	0	0	0	0	+	+	0	0	0	0	0	0	+	0	0	This policy encourages the provision of some employment uses outside of employment areas, allowing for small businesses and start-ups to have the flexibility they need.
EMP4 - Safeguarding Employment Land and Premises	0	0	0	0	+	+	++	0	0	0	0	0	0	0	0	0	This policy ensures that areas that are already used for employment purposes, continued to be used for those purposes, keeping jobs in the borough.
EMP5 - Local Skills and Training Opportunities	0	+	0	0	0	0	++	0	0	0	0	0	0	0	0	0	This policy provides opportunities for training and apprenticeships for local people, which can increase employment opportunities and wellbeing.
RET1 - Development in Town Centre Frontages	0	0	0	+	+	+	+	+	0	0	0	0	0	0	0	0	This policy will maintain the viability of existing town centres and potentially reduce the need to travel as shops, services, and facilities will be concentrated within town centres.
RET2 - Development Within Identified Retail Frontages and Local Centres	0	0	0	+	+	+	+	+	0	0	0	0	0	+	+	0	This policy will maintain the viability of existing town centres and potentially reduce the need to travel as retail will be concentrated within the identified retail frontages rather than in out-of-town shopping

																	centres.
RET3 - Development in Local Centres	0	0	0	+	+	+	+	+	0	0	0	0	0	0	0	0	This policy will maintain the viability of existing local centres and potentially reduce the need to travel as shops, services, and facilities will be concentrated within local centres.
RET4 - Development in Smaller Centres and Isolated Shops	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	This policy attempts to retain retail land where it currently is, but recognises that under certain circumstances, there may be a better use for the land.
RET5 - Development of Town Centre Uses Outside Town and Local Centres	0	0	0	+	+	0	-	+	0	0	0	0	0	0	+	0	This policy places restrictions on the development of town centre locations in areas other than town centres. This may restrict some employment opportunities, but by encouraging the continued viability of town centres it may also reduce the need to travel by car.
RET6 - Retail Warehousing	0	0	0	0	+	0	-	0	0	0	0	0	0	0	+	0	This policy encourages retail warehousing to be located in existing areas allocated for that use, and restricts their development elsewhere. This may restrict some employment opportunities, but by encouraging the continued viability of town centres it may also reduce the need to travel by car.
DES1 - Design of New Development	+	+	0	0	0	0	0	+	0	+	0	0	0	+	+	+	This policy encourages new developments that are safe and healthy for residents to live in, reduce greenhouse gases and flood risk where possible, and protect the landscape or townscape, biodiversity, and air quality.
DES2 - Residential Garden Land Development	+	0	0	0	-	0	0	0	0	0	0	0	0	0	+	+	This policy provides criteria for the development of back garden residential uses, taking into account the need to protect the landscape or townscape character and biodiversity resources.
DES3 - Residential Areas of Special Character	+	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	This policy provides criteria for residential development in RASCs, encouraging the protection

																	of the existing character.
DES4 - Housing Mix	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	This policy provides for the housing needs of the borough by ensuring that all new developments contain a mix of larger and smaller homes appropriate for different people.
DES5 - Delivering High Quality Homes	+	+	0	0	0	0	0	0	0	0	0	0	0	+	0	0	This policy requires new development to be high quality and healthy places for residents to live.
DES6 - Affordable Housing	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	This policy requires new developments to include a certain percentage of affordable housing, ensuring housing is accessible to a range of people on different incomes.
DES7 - Specialist Accommodation	+	+	0	+	0	0	0	+	0	0	+	0	0	0	+	0	This policy deals with caravan sites and accommodation for elderly people, ensuring that accommodation is available for a range of different people in the borough. It encourages accommodation for the elderly to be located near shops and facilities, reducing the need to travel, and makes clear that caravan sites should consider their impact on the local landscape.
DES8 - Community Facilities	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0	This policy encourages the retention of community facilities, reducing the need to travel further away to access them, and providing a good use of previously developed land.
DES9 – Electronic Communication Networks	0	0	0	+	0	+	0	+	0	0	0	0	0	0	+	0	This policy provides for the high speed broadband infrastructure needed by modern businesses, and could reduce travel through the increased use of telecommunication technologies. The policy also takes account of the landscape impact of infrastructure.

DES10 - Construction Management	0	+	0	0	0	0	0	0	0	0	0	0	+	+	0	0	This policy ensures that the health of residents will not be affected during the construction process of new developments, and requires land contamination to be cleaned up before development takes place.
DES11 - Pollution and Contaminated Land	0	+	0	0	0	0	0	0	0	0	0	0	+	+	0	0	This policy requires new development to take into account noise and air pollution issues to ensure the health of residents is not compromised, and requires contaminated land to be cleaned up before development takes place.
DES12 - Advertisements and Shop Front Design	0	+	+	0	0	0	0	0	0	0	0	0	+	+	0	0	This policy ensures that advertisements do not impact on residential amenity, landscape character, or heritage assets.
OSR1 - Urban Open Space	0	+	0	0	+	0	0	0	0	+	+	0	0	+	++	+	This policy protects existing Urban Open Space, which contributes to the health of residents, combats flood risk, reduces the impacts of noise and air pollution, and protects landscape character and biodiversity resources.
OSR2 - Open Space in New Developments	0	+	0	0	0	0	0	0	0	+	+	0	0	+	+	+	This policy encourages new Urban Open Space, which would contribute to the health of residents, combat flood risk, reduce the impacts of noise and air pollution, and enhance landscape character and biodiversity resources.
OSR3 - Outdoor Sport and Recreation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	This policy places criteria on the development of sport and recreation facilities, aimed at protecting landscape character and biodiversity resources.
TAP1 - Access, Parking and Servicing	0	+	0	+	0	0	0	+	0	0	0	0	0	0	+	0	This policy encourages appropriate levels of parking to meet the needs of residents of the borough, without negatively impacting on landscape or townscape character. The policy also encourages safe pedestrian and cycle facilities that connect to existing networks where possible, to promote

																	sustainable modes of transport.
TAP2 - Airport Car Parking	0	+	0	+	+	0	-	+	0	0	+	0	0	+	+	0	This policy restricts airport parking within the borough. This may restrict some employment opportunities, but the lack of large areas of airport parking will have positive effects on landscape character and air quality, and the policy supports Gatwick Airports sustainable transport strategy.
CCF1 - Climate Change Mitigation	0	0	0	0	+	0	0	++	++	0	0	0	0	0	0	0	This policy encourages renewable energy generation and the more efficient use of resources.
CCF2 - Flood Risk	0	+	0	0	0	0	0	0	0	++	++	0	0	0	0	0	This policy requires developments to be located away from areas of flood risk.
NHE1 - Landscape Protection	0	+	+	0	0	+	0	-	0	0	0	0	0	0	++	0	This policy provides strong protection for the landscape character of the borough, including the heritage assets contained therein. It also encourages some business development to promote the rural economy where possible. However, the policy somewhat restrictive of some types of renewable energy due to their impact on the landscape.
NHE2 - Protecting and Enhancing Biodiversity and Areas of Geological Importance	0	0	0	0	0	0	0	0	++	0	0	+	0	0	0	++	This policy provides strong protection for areas of biodiversity, including biodiversity opportunity areas like the River Mole and its tributaries.
NHE3 - Protecting Trees, Woodland Areas and Natural Habitats	0	+	0	0	0	0	0	+	+	0	+	0	0	+	+	+	This policy requires the protection of trees across the borough, which has positive impacts on health and wellbeing, flood risk reduction, air quality, landscape character, and biodiversity.
NHE4 - Green/Blue Infrastructure	0	+	0	0	0	0	0	+	+	+	+	+	0	+	+	+	This policy requires a green and blue infrastructure network to be maintained and enhanced within the borough. This has positive impacts on health and wellbeing, flood risk reduction, air quality, landscape character, and biodiversity.

NHE5 - Development within the Green Belt	0	0	+	0	++	0	0	0	0	0	0	0	0	0	+	0	This policy provides criteria for green belt developments, which protects the landscape and heritage assets within the green belt, and encourages development to take place elsewhere in the borough - meaning it is more likely to take place on previously developed land.
NHE6 – Reuse and Adaptation of Buildings in the Green Belt and the Rural Surrounds of Horley	0	0	+	0	++	+	+	0	+	0	0	0	0	0	+	0	This policy encourages the reuse of existing buildings in rural areas, particularly for uses that will support the rural economy and maintain the existing landscape character and any heritage assets.
NHE7 – Rural Surrounds of Horley	0	0	+	0	+	0	0	0	0	0	0	0	0	0	+	+	This policy restricts development within the Rural Surrounds of Horley, protecting the landscape, biodiversity, and heritage of the area, and encouraging development of brownfield land in the Horley urban area instead.
NHE8 - Horse Keeping and Equestrian Development	0	0	0	0	0	+	+	0	0	0	0	0	0	0	+	0	This policy encourages equestrian development, as long as the impact on landscape character is considered.
NHE9 - Heritage Assets	0	0	++	0	+	0	0	0	0	0	0	0	0	0	+	0	This policy encourages equestrian development, as long as the impact on landscape character is considered.
GTT1 - Gypsy, Traveller and Travelling Showperson Accommodation	+	0	0	0	-	0	0	0	0	0	0	0	0	0	0	0	This policy provides allocations for housing for gypsy, traveller, and travelling showpeople communities, although this land is not previously developed.
CEM1 - Cemetery and Crematorium Provision	0	0	0	0	0	0	0	0	0	0	0	+	+	+	+	+	This policy ensures that any cemetery or crematorium developments will take into account impact on biodiversity, landscape character, land contamination, water quality, air quality, and noise pollution.

INF1 - Infrastructure	+	+	0	+	0	0	0	0	0	0	+	+	0	0	0	0	0	This policy provides for the necessary infrastructure to support housing development in the borough, including community, health, education, and sport and recreation facilities, as well as physical infrastructure including flood defence.
MLS1 - Phasing of Urban Extension Sites	+	0	0	0	+	0	0	0	0	0	0	0	0	0	0	+	0	This policy sets out the phasing process for the sustainable urban extensions sites, explaining under what circumstances they will be released for development. The gradual release of these sites provides benefits for landscape impact, and ensures that previously developed land is the first focus of development.
MLS2 - Safeguarding Land for Development Beyond the Plan Period	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	This policy safeguards land beyond the current plan period for potential use as housing land in the future. The current impact is therefore neutral, although it may have a positive impact on housing in the future.

Urban Site Allocations

4.23. A total of 66 urban sites have been appraised in this report. This includes sites that were evaluated in the Regulation 18 sustainability appraisal, as well as sites that were promoted through the Development Management Plan Regulation 18 consultation and the Housing and Employment Land Availability Assessment.

4.24. In addition to the sustainability appraisal for each site, the decision on which sites to include in the final Development Management Plan Regulation 19 document was based upon the availability, viability, and deliverability of each site. However, generally, the sites included in the final document are those that scored well in the sustainability appraisal – those that were close to town centres and accessible via sustainable transport modes, offered the opportunity for housing and in many cases employment or community uses as well, and were low on flood risk. Some sites that scored well in the sustainability appraisal are not included in the Development Management Plan allocations due to receiving planning permission since the sustainability appraisal was undertaken. Sites that were not chosen for inclusion in the final allocations were generally those that exhibited some sustainability problems, particularly around flooding, distance from town centres, or air quality and noise pollution issues; or were otherwise found to be unavailable, unviable, or undeliverable through the other assessments undertaken as part of the Development Management Plan process.

4.25. The chosen sites are:

- In the north of the borough:
 - The Horseshoe, Banstead
 - Banstead Community Centre, Park Road, Banstead
 - 136-168 High Street, Banstead
- In the centre of the borough:
 - 16-46 Cromwell Road, Redhill
 - Gloucester Road Car park, Redhill
 - Colebrook, Noke Drive, Redhill
 - Former Longmead Centre, Holland Close, Redhill
 - Quarryside Business Park, Thornton Side, Redhill
 - Bellway House, Station Road, Merstham
 - Church of Epiphany, Mansfield Drive, Merstham
 - Merstham Library, Weldon Way, Merstham
 - Former Oakley Centre, Radstock Way, Merstham
 - Reading Arch Road/Brighton Road North, Redhill
 - Land Adjacent to the Town Hall, Castlefield Road, Reigate
 - Library and Pool House, Bancroft Road, Reigate
 - Albert Road North Industrial Estate, Reigate
- In the south of the borough:
 - High Street Car Park, Horley
 - Horley Police Station, 15 Massetts Road, Horley

- Horley Library, Victoria Road, Horley
- Former Chequers Hotel, Bonehurst Road, Horley
- 59-61 Brighton Road, Horley
- 50-66 Victoria Road North, Horley
- Telephone Exchange, Victoria Road South, Horley

4.26. The results of the assessment can be seen in the table below. The individual assessments can be seen in [Appendix I](#). A summary of the assessments for the selected sites can be seen in [Appendix O](#).

Urban Site Allocations																	
Site	Sustainability Objective																Comments
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	
136-168 High Street, Banstead	+	++	0	+	+	+	++	+	0	++	++	0	+	0	0	0	This site is estimated to provide 40 housing units, and is well-located in a town centre area, with easy access to services and facilities. The land is previously developed, and there is an opportunity to revitalise part of the town centre. The development is expected to provide 1,500sqm of leisure, retail, or community uses in addition to housing, benefiting the economy and increasing employment options. The site is sequentially preferable in terms of flooding.
The Horseshoe, Banstead	0	++	0	+	+	+	++	+	0	+	+	0	0	0	0	0	This site is not primarily focused on housing, but will provide an improvement to the town centre through enhanced access to community and public services. The site is located next to the town centre, and is easily accessible for local residents. The site is sequentially preferable in terms of flooding. Development on this site may encourage more visitors to Banstead town centre, improving the retail economy.
Banstead Community Centre	+	++	-	+	+	+	++	+	0	++	++	0	0	0	0	0	This site is estimated to provide 15 housing units, and is well-located in a town centre area, with easy access to services and facilities. The land is previously developed, and there is an opportunity to revitalise part of the town centre. The development is expected to provide improved community facilities that will improve access to services for local residents and may encourage more visitors to Banstead town centre, improving the retail economy. The site is sequentially

																		preferable in terms of flooding. There are a number of heritage constraints on the site that would require very sensitive design to avoid harm.
Land at Wellesford Close, Banstead	+	0	0	-	-	+	+	-	0	++	++	0	0	0	0	0	0	This site is estimated to provide 15 housing units, and is sequentially preferable in terms of flooding. However, the site is some distance from the town centre, and is likely to encourage additional car use because of this. Development on this site would be contrary to the objective of focusing on previously developed land first.
Land at Kingswood Station	+	0	+	0	++	0	0	0	0	0	0	0	+	+	+	0	0	This site is estimated to provide 35 housing units, and would be a good re-use of previously developed industrial land which is located within a local centre and next to a conservation area. Redevelopment would be likely to improve noise and air quality issues that may be caused by the current industrial use. While the site is within a local centre and next to a train station, services and facilities are limited in this area, and residents will probably have to travel regularly, and will likely use cars to do so.
Legal and General, Kingswood	?	-	0	0	0	0	0	0	0	0	0	0	+	0	-	0	0	The site is close to a local centre, but one with limited services, and also close to a train station, but one with infrequent services. The site is within the green belt and partially within the AGLV, so the landscape impact of additional development on this site is likely to be negative. However, the site is sequentially preferable in terms of flooding.

Former City Gate Mini, 90 The Avenue, Tadworth	+	+	+	0	0	0	0	0	0	0	++	++	0	+	+	+	0	This site is estimated to provide 10 housing units, and would be a good re-use of previously developed commercial land which is located within a local centre. Redevelopment would be likely to improve noise and air quality issues that may be caused by the current use. The site is sequentially preferable in terms of flooding. While the site is within a local centre and next to a train station, services and facilities are limited in this area, and residents will probably have to travel regularly, and will likely use cars to do so, although there is good access to green space in the immediate area.
Laboratory Site, Pitwood Park Industrial Estate, Waterfield, Tadworth	+	-	0	-	-	-	0	0	0	++	++	0	+	-	0	0	This site is estimated to provide 23 housing units, and is sequentially preferable in terms of flooding. However, housing development would mean the loss of employment land in a designated employment area, and the location on an industrial estate next to a railway line may cause amenity problems for new residents. The site is also some distance from local centres or railway stations, and would increase the need to travel and probably increase the use of cars to do so.	
Banstead Football Club, Merland Rise, Epsom, Tadworth	+	0	0	-	+	+	+	-	0	++	++	0	0	0	+	0	This site is estimated to provide 30 housing units, is sequentially preferable in terms of flooding, and would be likely to improve the townscape character compared to the current use of the site. However, the site is some distance from the nearest local centres, and even further from a town centre, and is likely to lead to increased car use and greenhouse gas emissions.	

Church of Epiphany, Merstham	+	+	0	+	+	+	+	+	0	0	0	0	0	0	0	0	This site is estimated to provide 30 housing units, and is well-located close to a local centre and a train station with good services. The site is currently vacant, and could be positively brought back into use as housing, as long as consideration is given to the need for religious facilities in the area.
Bellway House, Merstham	+	0	0	+	+	0	0	+	0	0	0	0	+	-	+	0	This site is estimated to provide 30 housing units, and is well-located close to a local centre and next to a train station with reasonable services. The site is currently used for offices, but is not a designated employment site, and redevelopment of land this close to a station for housing may be a good use of previously developed land, and may lead to an improvement in the townscape close to a conservation area. However, the site's proximity to a motorway and a busy main road, and partially within an AQMA, may cause amenity problems for new residents.
Former Oakley Centre, Merstham	+	+	+	+	++	+	+	+	0	++	++	0	+	0	0	0	This site is estimate to provide 30 housing units, and is well-located close to a local centre, and fairly close to a train station with reasonable services. The site is currently vacant and is a locally listed building, and this development offers the opportunity to protect a heritage asset and bring it back into use. The site is sequentially preferable in terms of flooding.

Merstham Library	+	+	0	+	++	+	+	+	0	-	-	0	0	0	0	0	This site is estimated to provide 30 housing units, and is well-located close to a local centre and a train station with good services. The site will soon be vacant, as the current library services are being relocated nearby, and there is an opportunity to include community uses in the redevelopment of this site - this is a good use of previously developed land. However, the site suffers from a risk of flooding.
Belfry, Redhill	0	++	0	++	+	++	+	++	0	--	--	0	+	-	0	0	It is uncertain how much housing could be provided on this site, but it is well-located in a town centre and near a train station. Redevelopment of the site to add housing to the existing retail uses would be a good use of previously developed land, but there may be some amenity problems for new residents due to the concentration of leisure uses in the area and the proximity to main roads. The site is at risk of flooding.
Berkeley House, High Street, Redhill	+	++	0	++	-	0	0	++	0	++	++	0	+	-	0	0	This site is estimated to provide 25 housing units, and is well-located in a town centre and close to a train station. The site is sequentially preferable in terms of flooding. However, there is no suggestion of retaining the current office use on the site as part of a redevelopment, and a mixed-use scheme would be a better use of previously developed land than a purely housing-focused scheme. There may also be amenity problems for new residents, due to the site being close to main roads and located within an AQMA.

Brethren Meeting Room, 2 Redstone Hill, Redhill	+	+	0	0	-	+	+	0	0	+	+	0	+	0	0	0	This site is estimated to provide 5 housing units, and is sequentially preferable in terms of flooding. The site is close to Earlswood station, providing access to Redhill fairly easily. The site is currently used for religious purposes, and the loss of this use for a small amount of housing may not be a good use of previously developed land unless provision is made for relocating the original use.
Brethren Meeting Room, 43 Woodlands Road, Redhill	+	+	0	0	-	+	+	0	0	++	++	0	+	0	0	0	This site is estimated to provide 5 housing units, and is sequentially preferable in terms of flooding. The site is close to Earlswood station, providing access to Redhill fairly easily. The site is currently used for religious purposes, and the loss of this use for a small amount of housing may not be a good use of previously developed land unless provision is made for relocating the original use.
Colebrook, Redhill	++	++	0	++	+	++	+	++	0	-	-	0	+	0	0	0	This site is estimated to provide 80 housing units, and is well-located next to a town centre and a train station. The site currently has a day care centre on it, and it is envisaged that community uses will be reprovided in the redevelopment - if this happens, the transition to a mixed use scheme including housing would be a good use of previously developed land. However, the site is at risk of flooding.
16-46 Cromwell Road, Redhill	+	++	0	++	+	+	+	++	0	0	0	0	0	-	+	0	This site is estimated to provide 30 housing units, and is well-located in a town centre and close to a train station. The development is expected to reprovide the existing retail space, so the addition of housing is a good use of previously developed land. However, the site is close to a busy road and within an AQMA, suggesting potential amenity problems for new residents.

Donyngs Car park and Indoor Bowls Centre Car Park	+	+	0	+	+	+	+	+	0	++	++	0	+	0	+	0	This site is estimated to provide 40 housing units, and is fairly close to a town centre and a train station, as well as being close to a smaller local centre providing some services. The site is sequentially preferable in terms of flooding. As the site is currently a car park, redevelopment for housing would be a good use of previously developed land near a town centre, and could improve the existing townscape in this area of Redhill.
Extension to the Rear of West Central, Redhill	+	++	0	++	+	+	+	++	0	++	++	0	+	0	0	0	This site is estimated to provide 5 housing units, and is well-located next to a town centre and a train station, and is sequentially preferable in terms of flooding. The site is currently used for parking and servicing, so redevelopment for housing would be a good use of previously developed land.
Former Longmead Centre, Redhill	+	++	+	++	++	+	+	++	0	0	0	0	+	0	0	0	This site is estimated to provide 20 housing units, and is well-located within a town centre and close to a train station. The site is a listed building that is currently vacant, and redevelopment would be a good use of previously developed land and bring a heritage asset back into use. However, the site is at risk of flooding.
Former Mercedes Garage, Brighton Road, Redhill	+	++	0	++	-	0	0	++	0	--	--	0	+	-	0	0	This site is estimated to provide 35 housing units, and is well located near to a town centre and train station. The site is currently vacant, but redevelopment for housing may not be seen as the best use of this previously developed land, due to being surrounded by employment and industrial uses - an attempt to bring back a similar use to the site, or a mixed-use scheme might be preferable. The site is at risk of flooding, and there may be amenity problems for residents based on the

																		proximity to a busy road and an AQMA, and the industrial area that surrounds the site.
Former Territorial Army Site, Linkfield House, 3 Batts Lane, Redhill	+	++	+	+	+	+	+	+	0	++	++	0	+	0	0	0		This site is estimated to provide 25 housing units, and is fairly close to a town centre and a train station, as well as being close to a smaller local centre providing some services. The site is sequentially preferable in terms of flooding. The site is a listed building which is currently vacant, so redevelopment would be a good use of previously developed land and bring a heritage asset back into use.
Gloucester Road Car Park, Redhill	+	++	0	++	+	++	++	++	0	0	0	0	+	0	+	0		This site is estimated to provide between 30-60 housing units and 2,500-4,000sqm of office space, and is well-located within a town centre and close to a train station. The site is currently a car park, and a mixed use scheme here would be a good use of previously developed land and would offer an opportunity to improve the townscape of the area. However, the site is at risk of flooding.
Grosvenor House, Redhill	++	++	0	++	-	+	0	++	0	0	0	0	+	-	0	0		This site is estimated to provide between 100-120 housing units, and is well-located next to a town centre and close to a train station. The site is currently used for offices, and a mixed use scheme that retains some employment provision might be seen as a better use of previously developed land rather than a proposal that focuses purely on housing. The loss of such an amount of employment space would potentially have negative economic effects. The site is also close to a busy road and an AQMA, which may cause some amenity problems for new residents.

Hockley Business Centre, Hooley Lane, Redhill	+	+	0	+	0	0	0	+	0	+	+	0	+	+	+	0	This site is estimated to provide 30 housing units, and is fairly well-located between a town and local centre, with reasonably easy access to Redhill. The site is currently used for industrial purposes, but has some residential uses surrounding it already - consequently, the development of this land for housing may improve residential amenity and be seen as a fairly good use of previously developed land and an improvement to the townscape. The site is also sequentially preferable in terms of flooding.
Reading Arch Road/Brighton Road North, Redhill	++	++	0	++	+	++	+	++	0	--	--	0	+	-	+	0	This site is estimated to provide 100 housing units and 4,000sqm of bulky goods retail space, and is well-located next to a town centre and close to a train station. The site is currently used for industrial and warehousing purposes, and a mixed use redevelopment with bulky goods retail provision would be a good use of previously developed land and would boost the retail economy and provide employment. Redevelopment could also improve the townscape in an area dominated by utilitarian buildings. However, the site is at risk of flooding, and is surrounded by busy roads and railway lines and close to an AQMA, potentially leading to amenity problems for new residents.

Land Between Southbound Railway and eastbound Railway (South of Redhill Train Station)	+	0	0	++	+	+	+	++	0	+	+	0	+	--	0	0	This site is estimated to provide 20 housing units, and is well-located next to a town centre and close to a railway station. The site is sequentially preferable in terms of flooding, and is currently used as railway land - if the land is no longer needed for railway purposes, housing would be a good way of re-using it, especially in such a convenient location. However, there are likely to be severe amenity issues relating to the fact that the site is surrounded by railway lines on all sides.
Land North of Brook Road, Redhill	+	+	0	+	0	0	0	+	0	--	--	0	+	-	+	0	This site is estimated to provide 12 housing units, and is located fairly close to a town centre and local centre, and with reasonably easy access to Redhill for services and facilities. The site is currently used for commercial units in an area that already has a lot of such uses, and housing could be considered a good use of previously developed land as long as overall employment provision in the area is considered. Redevelopment of the commercial properties may also improve the townscape of the area. However, there may be amenity problems for new residents caused by the proximity to busy roads, a railway line, and industrial uses; and the site is at risk of flooding.
Linkfield Lane Car Park, Redhill	+	++	0	+	+	+	+	+	0	++	++	0	0	0	+	0	This site is estimated to provide 20 housing units, and is well located close to a town centre and train station, and even closer to a local centre that provides some services. The site is currently a car park, and redevelopment would improve the townscape in this area and could be seen as a good use of previously developed land as long as the overall provision of car parking for Redhill town centre is considered. The site is also sequentially

																		preferable in terms of flooding.
Maple Works, Redhill	?	0	0	0	+	+	+	0	0	--	--	0	+	0	0	0		The site is close to a local centre which offers limited services, but is some distance from the town centre and train station of Redhill. The site is currently in residential use, so intensification of the amount of housing on the site would be a good use of previously developed land. However, the site is at risk of flooding.
Marketfield Way/High Street, Redhill	++	++	+	++	+	++	++	++	0	--	--	0	+	-	+	0		This site is estimated to provide 150 housing units, 3,500sqm of retail, 1,200sqm of food and drink uses, and a cinema, and is well-located in a town centre and next to a train station. The site is currently used as a car park, so redevelopment for a mixed use scheme of this kind would be a very good use of previously developed land, and would improve the townscape of the area and the setting of nearby listed buildings. However, the site is close to busy roads and within an AQMA, which may cause amenity problems for new residents, as may the concentration of leisure uses at night. The site is also at risk of flooding.

Quarryside Business Park, Redhill	+	0	0	-	+	0	0	-	0	+	+	0	+	+	0	0	This site is estimated to provide 60 housing units, and is sequentially preferable in terms of flooding. The site is currently used for industrial purposes - in this area, most industrial uses are on the western side of the railway and the eastern side, where this site is located, is now mostly residential. redevelopment for housing can therefore be seen as a good use of previously developed land, and may reduce noise and pollution issues from the current industrial site, improving residential amenity. However, the site is some distance from the nearest town centre or train station, and consequently may increase the need to travel and use cars to access services and facilities.
Redhill Law Courts, Redhill	+	++	0	+	+	+	+	+	0	+	+	0	+	0	+	0	This site is estimated to provide 35 housing units or an educational facility, and is well-located close to a town centre and train station, and even closer to a local centre providing some services. The land is currently used as a law court, but this is due to close soon, and redevelopment for housing or educational uses would be a good use of previously developed land. Redevelopment could also potentially improve the streetscape, as the site is surrounded by a c conservation area. The site is also sequentially preferable in terms of flooding.

Royal Mail Sorting Office, Redhill	++	++	0	++	+	++	++	++	0	-	-	0	+	-	+	0	This site is estimated to provide between 80-120 housing units and 3,000sqm of office space, and is well-located next to a town centre and a train station. The site is currently used as a mail sorting office and car park, and redevelopment for a mixed use scheme that keeps office uses would be a good use of previously developed land. The area is currently quite utilitarian in appearance, and redevelopment offers the opportunity to improve the townscape character. However, the site is at risk of flooding, and close to a busy road and an AQMA, which may cause some amenity problems for new residents.
Albert Road North Industrial Estate, Reigate	+	++	+	+	+	++	+	+	++	0	0	0	+	0	+	0	This site is estimated to provide 50 housing units, and is well located close to the centre of town and fairly close to a train station with reasonable services. The site is currently designated employment land, but there is a proposal to reprovide employment uses on the site as part of the redevelopment, so this may be seen as a good use of previously developed land to create a mixed use scheme. The site is close to a conservation area and to the green belt, and a mixed use redevelopment may improve the townscape and landscape in this area.
Alma House, 1A Alma Road, Reigate	+	++	0	++	-	0	0	++	0	0	0	0	+	0	0	0	This site is estimated to provide 12 housing units, and is well-located close to a town centre and a train station with reasonable services. However, the site is currently used for offices, in an area with a lot of similar office uses, and a mixed use scheme might be seen as a better use of previously developed land that maintains some employment uses, rather than a purely housing-based scheme.

Land Adjacent to the Town Hall, Reigate	+	++	--	++	+	++	++	++	0	++	++	0	0	0	0	0	This site is estimated to provide 25 housing units, and is well-located within a town centre and close to a train station with reasonable services. The site is currently used as a car park, and as long as enough parking facilities are available to serve the town hall and the town centre, a mixed-use redevelopment with housing and 1,000sqm of retail or community uses could be seen as a good use of previously developed land which will benefit the economy and provide employment opportunities. The site is sequentially preferable in terms of flooding. However, there are a number of heritage constraints on the site - the site is close to listed buildings, an historic park or garden, and a scheduled ancient monument, and is entirely within a conservation area and an area of high archaeological potential. Development would have to be designed very sensitively to protect these heritage assets and designations.
Land to the Rear of 45 West Street, Reigate	+	++	-	+	-	+	+	+	0	--	--	0	0	0	0	0	This site is estimated to provide 15 housing units, and is well-located close to a town centre and fairly close to a train station with reasonable services. However, the site is at high risk of flooding, and is not considered previously developed land due to currently being a back garden. The site is attached to a listed building, is within a conservation area, and is adjacent to the green belt and the AGLV, and back garden development on this site may impact on some of these designations.

Land to the Rear of Retail Frontage in Bell Street	?	++	--	+	+	+	+	+	0	-	-	0	+	0	-	0	The site is well-located within a town centre and close to a train station with reasonable services. The site consists of the rear of retail uses, mostly used for parking, and so would represent intensification of land use in central Reigate, a good use of previously developed land. However, there are a number of potential heritage constraints due to the large concentration of listed buildings in the area, and development may have an impact on some aspects of the townscape as well. The site is also at risk of flooding.
Library and Pool House, Reigate	+	++	0	+	0	++	+	+	0	-	-	0	+	0	0	0	This site is estimated to provide 25 housing units and 1,000sqm of retail or community uses, and is well-located next to a town centre and close to a train station with reasonable services. The re-provision of community uses and potential provision of retail would have positive impacts on the local economy and access to services and facilities. However, the site is at risk of flooding.
Reigate Station Car Park	+	++	0	++	+	+	+	++	0	++	++	0	+	-	+	0	This site is estimated to provide 20 housing units, and is well-located next to a town centre and right next to a train station with reasonable services. The land is currently used as a car park, and redevelopment for housing would be a positive use of previously developed land, as long as there is enough parking provision retained for the train station. Redevelopment of a car park may also improve the townscape character in the area. The site is sequentially preferable in terms of flooding. However, there may be some amenity problems for new residents related to being next to a fairly busy station.

Royal Mail Delivery Office, Rushworth Road, Reigate	+	++	0	++	+	+	0	++	0	++	++	0	+	-	+	0	This site is estimated to provide 12 housing units, and is well-located next to a town centre and right next to a train station with reasonable services. Redevelopment for housing would be a positive use of previously developed land, as long as the existing facilities can be relocated. The site is sequentially preferable in terms of flooding. However, there may be some amenity problems for new residents related to being next to a fairly busy station.
The Orchard, Bell Street, Reigate	?	+	-	+	-	+	+	+	0	-	-	0	+	0	-	0	The site is well-located within a town centre and close to a train station with reasonable service. However, the site is not previously developed, and would see a loss of open space if development were to take place. This might also affect the setting of other open spaces adjacent to this site, damaging the townscape and landscape character. The site is also at risk of flooding.
Garage Block, Kingsley Grove, Woodhatch, Reigate	+	+	0	0	+	+	+	0	0	-	-	0	0	0	+	0	This site is estimated to provide 12 housing units, and would be a good use of previously developed land that would improve the townscape character of the area. The site is close enough to some open spaces and a local centre to encourage some walking, although it will not reduce overall car use by residents. The site is at some significant risk of surface flooding.
Lime Tree School, Alexander Road	+	0	0	-	-	0	0	-	0	++	++	0	+	0	0	0	This site is estimated to provide 18 housing units, and is sequentially preferable in terms of flooding. However, it is some distance from the nearest train station, and the distance from services and facilities is likely to increase the need to travel and to use cars. The site is currently a school, and the loss of an education use and the associated jobs may be seen as bad for the economy and a poor use of

																	previously developed land.
Field on Bonehurst Road Between Cambridge Hotel and Lawson's Timber Yard, Salfords	++	-	-	-	--	0	+	-	0	0	0	0	0	0	--	0	This site is estimated to provide 110 housing units. However, the site is a long way from town centres or train stations; and is located within the green belt and opposite a listed building, potentially having a negative effect on the landscape character and listed building setting. The site is not previously developed, and therefore contrary to the objective of focusing on previously developed land.
Salfords Industrial Estate, Bonehurst Road, Salfords	++	+	0	+	-	-	-	+	0	+	+	0	+	+	+	0	This site is estimated to provide 440 housing units, and is well-located close to the centre and train station at Salfords - services here are currently limited, but would likely improve with such a large settlement added nearby. The site is sequentially preferably in terms of flooding, and redevelopment of the industrial estate for housing would likely improve the landscape and townscape character and reduce noise and pollution from industry. However, it would also mean the loss of significant amounts of employment, and the site is currently a designated employment area, so this may not be the best use of previously developed land while other sites remain available.

<p>Old Philips Site on the Junction of Cross Oak Lane and A23</p>	++	-	0	-	-	-	0	-	0	-	-	0	+	-	0	0	<p>This site is estimated to provide 60 housing units. However, the site is not located near a town centre or train station, and would almost certainly increase the need to travel and to use cars for new residents. The site is designated employment land, so it would be preferable to retain employment uses on the site, although the site is currently derelict. New residents on a housing development on this site may also be affected by amenity problems due to being located between a major road, a railway line, and an industrial estate.</p>
<p>39-49 High Street, Horley</p>	+	+	0	++	+	++	+	++	0	++	++	0	+	0	+	0	<p>This site is estimated to provide 30 housing units and 1,100sqm or retail or community uses, and is well-located within a town centre and close to a train station. The site is already in mixed-use, and a mixed-use redevelopment to add housing and revitalise the town centre would be a good use of previously developed land. The area is of relatively low sensitivity to change, and development offers the opportunity to improve the townscape. The site is sequentially preferable in terms of flooding.</p>
<p>50-66 Victoria Road, Horley</p>	+	+	0	++	+	++	+	++	0	++	++	0	+	0	0	0	<p>This site is estimated to provide 25 housing units and 1,500sqm or retail or leisure uses that could provide employment and boost the economy, and is well-located within a town centre and close to a train station. The site is already in commercial use, and a mixed-use redevelopment to add housing and revitalise the town centre would be a good use of previously developed land. The site is sequentially preferable in terms of flooding.</p>

59-61 Brighton Road, Horley	+	+	0	++	+	+	0	++	0	++	++	0	+	0	0	0	This site is estimated to provide 20 housing units, and is well-located close to a town centre and train station. Redevelopment would see the loss of only a small amount of employment for a reasonable amount of housing, and the site is sequentially preferable in terms of flooding.
Albert Brewery, Balcombe Road, Horley	+	+	-	++	0	-	-	++	0	0	0	0	+	0	+	0	This site is estimated to provide 6 housing units, and is well-located close to a town centre and train station. This site is in a utilitarian area near the railway line, and redevelopment could improve the townscape character. However, the site contains a locally listed building designed for industrial uses, which would need to be carefully converted, and redevelopment would see the loss of employment land for only a very small amount of housing.
Brethren Meeting Hall, Whitmore Way, Horley	+	0	0	-	-	+	+	-	0	--	--	0	+	0	0	0	This site is estimated to provide 15 housing units. However, the site is a long way from Horley town centre, and would likely increase the need to travel and use cars to access services and facilities. The site is at significant risk of flooding. Redevelopment would see the loss of religious and community uses for only a small amount of housing, and with no current plan to replace these uses, and therefore might not be the best use of previously developed land.
Brethren Meeting Room, The Grove Meeting Hall, The Grove, Horley	+	+	0	++	-	+	+	++	0	++	++	0	0	0	0	0	This site is estimated to provide 5 housing units, and is well-located close to a town centre and train station. The site is sequentially preferable in terms of flooding. Redevelopment would see the loss of religious and community uses for only a small amount of housing, and with no current plan to replace these uses, and therefore might not be the best use of previously developed land.

Bridge Industrial Estate, Horley	+	+	-	++	0	-	-	++	0	0	0	0	+	0	+	0	This site is estimated to provide 6 housing units, and is well-located close to a town centre and train station. This site is in a utilitarian area near the railway line, and redevelopment could improve the townscape character. However, the site contains a locally listed building designed for industrial uses, which would need to be carefully converted, and redevelopment would see the loss of employment land.
Central Car Park, Consort Way East, Horley	+	+	0	++	+	+	+	++	0	+	+	0	+	0	+	0	This site is estimated to provide 30 housing units, and is well-located in Horley town centre and near a train station. The site is sequentially preferable in terms of flooding, and due to currently being a car park, redevelopment here would improve the townscape and be a good use of previously developed land, as long as enough parking provision is retained across the town centre.
Former Chequers Hotel, Horley	+	0	+	-	++	+	+	-	0	+	+	0	+	0	0	0	This site is estimated to provide 45 housing units, is sequentially preferable in terms of flooding, and would be a good use of previously developed land that brings a vacant heritage asset back into use. However, the site is located some distance from the town centre of train station, and may increase the need to travel and use cars.
High Street Car Park, Horley	+	+	0	++	+	++	++	++	0	+	+	0	+	0	+	0	This site is estimated to provide 30 housing units, and is well-located in Horley town centre and near a train station. The site is also expected to provide 1,000sqm of retail, boosting the economy and providing employment. The site is sequentially preferable in terms of flooding, and due to currently being a car park, redevelopment here would improve the townscape and be a good use of previously developed land, as long as enough

																	parking provision is retained across the town centre.
Horley Library	+	+	0	+	0	+	+	+	0	+	+	0	0	0	0	0	This site is estimated to provide 35 housing units and possibly some additional community uses, and is well-located within a town centre and close to a train station. The site is currently in use as a library, and this would only be a good use of previously developed land if the library services can be provided on site or elsewhere. The site is sequentially preferable in terms of flooding.
Horley Police Station	+	+	0	++	+	+	+	++	0	++	++	0	+	0	+	0	This site is estimated to provide 20 housing units, and is well-located within a town centre and close to a train station. The land is currently used as a police station, but this use is expected to come to an end soon, potentially leaving the building vacant and making redevelopment on the site a good use of previously developed land. Redevelopment offers an opportunity to improve the townscape character in an area which is sometimes in poor condition. The site is sequentially preferable in terms of flooding.
Hutchins Farm, Horley	0	0	0	-	-	0	0	-	0	+	+	0	0	0	0	0	This site is estimated to provide 3 housing units, and is sequentially preferable in terms of flooding. However, it is some distance from the town centre and train station and would likely increase the need to travel and use cars to access services and facilities. The site is already in residential use, and redevelopment for such a small amount of additional housing is probably not a sensible use of previously developed land on a site currently containing listed buildings that may be impacted by the redevelopment.

Telephone Exchange, Horley	+	+	0	++	+	+	+	++	0	0	0	0	+	0	0	0	This site is estimated to provide 30 housing units and possibly some additional community uses, and is well-located within a town centre and close to a train station. The site is currently in use, but if the telephone exchange can be relocated, redevelopment would be a good use of previously developed land.
2 Saxley Court and 117 Victoria Road, Horley	+	+	0	++	+	+	+	++	0	++	++	0	+	0	0	0	This site is estimated to provide 60 housing units and retain the existing retail uses, and is well-located within a town centre and close to a train station. The site is sequentially preferable in terms of flooding.
Royal Mail, Horley	+	+	0	++	+	++	+	++	0	++	++	0	+	0	0	0	This site is estimated to provide 15 housing units and 500sqm or retail uses that could provide employment and boost the economy, and is well-located within a town centre and close to a train station. The site is currently in use, but Royal Mail are considering relocating - redevelopment would be a good use of previously developed land if this happens. The site is sequentially preferable in terms of flooding.

Sustainable Urban Extensions Allocations

- 4.27. A total of 33 potential Sustainable Urban Extensions were appraised in the Regulation 18 sustainability appraisal, and the same sites have been appraised here for consistency. The chosen alternatives are sites ERM1, ERM2, ERM3, ERM4, ERM5, SSW2, SSW6, SSW7, SSW9, NWH1, NWH2, and SEH4.
- 4.28. These sites were chosen for a combination of their sustainability appraisal, the likelihood of them coming forward for development, their spatial locations in relation to existing towns, and assessments of their green belt value.
- 4.29. The ERM sites all scored well in the appraisal, with particularly good scores for objectives related to housing, the economy, flood risk, and sustainable transport and greenhouse gases, although some sites scored negatively for landscape impact, biodiversity, and air and noise pollution, and these issues will have to be mitigated against. Sites SSW2 and SSW7 scored similarly well on housing, economy, and flood risk, and did not have the same negative scores as the ERM sites on landscape and biodiversity, though they are located further away from a town centre and will probably be more reliant on unsustainable transport modes. Site SSW6 is a small part of a larger parcel, but was a logical infill to the existing urban area and free from flood risk. Site SSW9 scored similarly, but must also mitigate against harm to heritage assets. The three sites in Horley present more potential negatives, with issues around flooding, noise and air pollution, and landscape impact. However, site SEH4 is very sustainably located close to the town centre, and the NWH sites are close to the growing northwest sector development in Horley, and will thus be well-located for services and additional public transport that will eventually come into being in the area.
- 4.30. The results of the assessment can be seen in the table below. The individual assessments can be seen in [Appendix J](#). A summary of the assessments for the selected sites can be seen in [Appendix O](#).

Sustainable Urban Extension Allocations																	
Site	Sustainability Objective																Comments
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	
NWH1 - Land at Meath Green Lane	++	+	-	--	0	+	+	--	0	-	-	?	0	-	-	0	The site is estimated to have a capacity of 59-119 dwellings. The site is a significant distance from the town centre, and is likely to increase car use significantly. Much of the site is located within a flood zone, and the site is likely to have a negative impact on landscape character due to introducing a large amount of housing into a rural area. The site also contains some listed buildings and an area of archaeological potential. However, the site presents the opportunity to complete the Riverside Green Chain around Horley, potentially having a very beneficial impact on health and wellbeing.
NWH2 - Land at Bonehurst Road	+	0	0	0	0	+	+	0	0	--	--	0	0	-	0	0	The site is estimated to have a capacity of 26-52 dwellings. Most of the site is located within a flood zone, and the site is located within an AQMA and close to Gatwick Airport, suggesting there may be some problems with air quality and noise pollution.
SEH1 - Land at Fishers Farm and Bayhome Farm	++	+	0	++	0	+	+	+	0	-	-	0	0	-	0	0	The site is estimated to have a capacity of 107-214 dwellings. The site is close to the town centre and employment area, with access to public transport. The site would potentially open up access to the Urban Open Land contained within its boundaries, improving public health and access to recreation. However, the site is within an AQMA, suggesting problems with air pollution that may affect residents' health. Part of the site is also within a flood zone.

SEH2 - Land West of Balcombe Road	++	-	0	0	0	+	0	0	0	++	++	0	0	-	--	0	The site is estimated to have a capacity of 46-93 dwellings. The site is located within an AQMA and close to Gatwick Airport, suggesting there may be some problems with air quality and noise pollution; and is entirely within the Gatwick Open Setting, meaning it would have a strong negative impact on landscape character by closing the gap between Gatwick and Horley. The site is currently listed as Urban Open Land, and the loss of this as open land may impact negatively on health and quality of life of local residents. However, the site is sequentially preferable from a flood risk perspective, with only a very small amount of the site at risk of flooding.
SEH3 - Land East of Balcombe Road	0	-	0	0	-	+	0	0	0	-	-	0	0	--	--	0	The site is adjacent to an AQMA and close to Gatwick Airport, suggesting there may be some problems with air quality and noise pollution, with the site falling entirely within the 57dB noise contour of Gatwick Airport, making development considerably less likely; and is entirely within the Gatwick Open Setting, meaning it would have a strong negative impact on landscape character by closing the gap between Gatwick and Horley. The site is also partially within a flood zone, and would lead to the loss of existing businesses on the site.

SEH4 - Land off The Close and Haroldslea Drive	++	-	0	++	+	+	0	+	0	-	-	0	+	-	-	0	<p>The site is estimated to have a capacity of 101-151 dwellings. The site is close to the town centre and employment area, with access to public transport. The site would represent a good use of previously developed land, as it would densify an existing residential area (although would also lead to some potential loss of employment uses). However, part of the site also falls within the Gatwick Open Setting which aims to maintain separation between Gatwick and Horley. The site is close to Gatwick Airport, and part of the site is also within the 57dB noise contour of Gatwick and close to an AQMA, suggesting problems with noise and air pollution that may affect residents' health. The western half of the site is also within a flood zone.</p>
SEH5 - Land West of Burstow Stream	++	-	0	-	0	+	+	-	0	0	0	-	+	-	--	-	<p>The site is estimated to have a capacity of 158 dwellings. The site is difficult to access and likely to increase car use significantly. The site is likely to have a negative impact on landscape character, which is considered of high priority, and part of the site also falls within the Gatwick Open Setting which aims to maintain separation between Gatwick and Horley. The site is within 100m of the M23, and part of the site falls within the 57dB noise contour of Gatwick, suggesting large problems with noise and air pollution that may affect residents' health.</p>
SEH6 - Land at Newstead Hall	--	-	0	0	0	+	+	0	0	--	--	-	0	0	0	--	<p>The site is entirely within a flood zone and is largely covered in dense woodland, the removal of which would have a negative impact on biodiversity and potentially on human health due to air quality issues. The site is difficult to access and likely to increase car use significantly.</p>

SEH7 - Land at Wilgers Farm	+	-	0	+	0	+	+	0	0	--	--	-	0	0	0	0	The site is estimated to have a capacity of 30-60 dwellings. The site is quite close to the town centre and would likely be fairly accessible through sustainable modes of transport. However, most of the site is located within a flood zone, and the site has previously been earmarked for use as a town park for Horley - using it for housing would obviously preclude the town park being located here.
SEH8 - Land at Farney View Farm	-	0	0	+	0	+	+	0	0	--	--	-	0	0	0	0	The site is estimated to have a capacity of only 3-7 dwellings, due to being almost entirely located within flood zones. The site is quite close to the town centre and would likely be fairly accessible through sustainable modes of transport, but would likely have some negative impact on landscape character in this rural area.
SEH9 - Land East of Wilgers Farm	--	0	0	-	0	+	+	-	0	--	--	-	0	0	-	0	The site is entirely within a flood zone, and difficult to access and likely to increase car use significantly. The site is also likely to have a negative impact on landscape character, jutting out into the countryside from the current urban area.
SEH10 - Land East of Farney View Farm	+	0	0	--	0	+	+	-	0	--	--	-	0	0	-	0	The site is estimated to have a capacity of 21-42 dwellings. The site is in an area with no public transport, and is likely to increase car use significantly. Most of the site is located within a flood zone, and the site is likely to have a negative impact on landscape character due to introducing a large amount of housing into a rural area.
SEH11 - Land at Harrowsley Green Farm	++	0	0	--	0	+	+	-	0	-	-	-	+	0	--	0	The site is estimated to have a capacity of 139-279 dwellings. The site is a significant distance from the town centre, and is likely to increase car use significantly. Part of the site is located within a flood zone, and the site is likely to have a negative impact on landscape character due to introducing a large amount of housing into a rural area. However, due to part of the site needing to be cleared of contamination before development can take place, the site would reduce land contamination in the borough.

SEH12 - Land South of Haroldslea Drive	+	0	--	--	0	+	+	-	0	--	--	-	0	-	--	-	The site is estimated to have a capacity of 12-23 dwellings. The site is a significant distance from the town centre, and is likely to increase car use significantly. Most of the site is located within a flood zone, and the site is likely to have a negative impact on landscape character due to introducing a large amount of housing into a rural area. The site also contains some listed buildings and a scheduled ancient monument, as well as a potential SNCI. The southern part of the site falls within the 57dB noise contour of Gatwick Airport, suggesting potential problems with noise and possibly air pollution from the airport.
EH1 - Land at Langshott Wood	+	0	0	0	0	+	+	0	0	-	-	0	0	0	-	--	The site is estimated to have a capacity of 15 dwellings. Part of the site is located within a flood zone, and half of the site is covered with ancient woodland. The need to protect the woodland is likely to lead to a fragmented development, isolated from the existing urban area, with a negative impact on landscape character.
EH2 - Brock Wood	+	+	0	--	0	+	+	-	0	--	--	0	0	0	--	-	The site is estimated to have a capacity of 15 dwellings. The site is a significant distance from the town centre, and is likely to increase car use significantly. The entire site is located within a flood zone, and the site is likely to have a negative impact on landscape character due to the area representing a key element of separation between Horley and Smallfield. Part of the site also contains an SNCI and ancient woodland. However, the site presents the opportunity to complete the Riverside Green Chain around Horley, potentially having a very beneficial impact on health and wellbeing.

EH3 - Land North of Smallfield Road	+	0	0	0	+	+	+	0	0	--	--	0	0	0	--	0	The site is estimated to have a capacity of 40 dwellings. The entire site is located within a flood zone, and the site is likely to have a negative impact on landscape character due to the area representing a key element of separation between Horley and Smallfield. The site would represent a densification of an area that already contains residential properties, a good use of previously developed land.
ERM1 - Land at Hillsbrow	++	+	0	+	0	+	+	0	0	++	++	0	+	-	--	-	The site is estimated to have a capacity of 113-226 dwellings. The site is not located within a flood zone. The site is close to the town centre and employment area, with access to public transport. The site would potentially open up access to the Urban Open Land contained within its boundaries, improving public health and access to recreation. However, the site is close to a major road and a landfill site, leading to potential air and noise pollution issues. The site is also elevated and near the AGLV, meaning it may have a particularly strong landscape character impact. The site contains some area of ancient woodland, and generally contains dense woodland, as well as being adjacent to an SNCI.
ERM2 – Land West of Copyhold Works	++	+	0	+	0	+	+	0	0	++	++	-	+	-	0	--	The site is estimated to have a capacity of 79-157 dwellings. The site is not located within a flood zone. The site is close to the town centre and employment area, and to large open spaces, with access to public transport. However, the site is close to a major road and a landfill site, leading to potential air and noise pollution issues. The site is near the AGLV, but well separated from it by the landfill. However, almost the entire site falls within an SNCI.

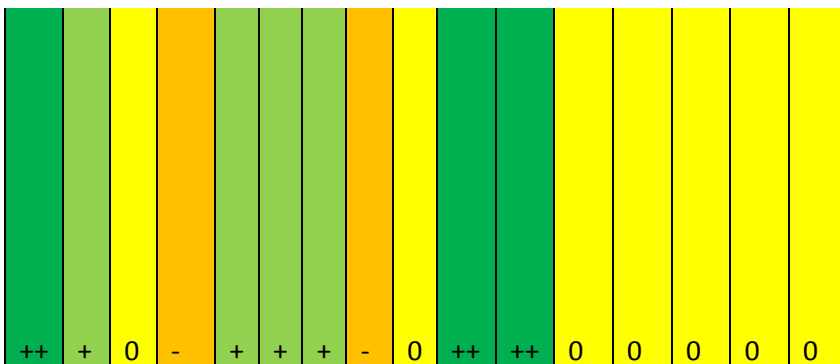
ERM3 - Former Copyhold Works	++	+	0	+	+	+	+	0	0	++	++	-	++	-	-	--	<p>The site is estimated to have a capacity of 92-183 dwellings. The site is not located within a flood zone. The site is close to the town centre and employment area, and to areas of open space, with access to public transport. The site is currently a landfill, so replacing this with housing would be a good use of previously developed land as long as an overall waste strategy is being pursued across the county and wider region. Residential development here would also necessitate the clearing of any contamination on the site. However, the site is close to a major road and is on top of a landfill site, leading to potential air and noise pollution issues. The site is also elevated and near the AGLV, meaning it may have a particularly strong landscape character impact, and is very close to an SNCI.</p>
ERM4 - Land South of Bletchingley Road	++	0	0	-	0	+	+	-	0	++	++	0	0	0	-	-	<p>The site is estimated to have a capacity of 81-163 dwellings. The site is not located within a flood zone. The site is close to a local centre, but a significant distance from the better connected town of Redhill. The site is in an area with long range views possible, and may have an impact on landscape character. There is a wetland nature reserve and an SNCI very close to the site.</p>
ERM5 - Oakley Farm, Off Bletchingley Road	++	0	-	-	0	+	+	-	0	++	++	0	0	0	0	0	<p>The site is estimated to have a capacity of 100-200 dwellings. The site is not located within a flood zone. The site is close to a local centre, but a significant distance from the better connected town of Redhill. The presence of two large motorways in the area means landscape impact is unlikely to be a great concern. However, there are a number of listed buildings within and adjacent to the site, and development may impact on their settings.</p>

ERM6 - Land North of Radstock Way	++	--	-	-	-	+	+	-	0	++	++	0	0	-	0	0	<p>The site is estimated to have a capacity of 45-90 dwellings. The site is not located within a flood zone. The site is close to a local centre, but a significant distance from the better connected town of Redhill. The presence of two large motorways in the area means landscape impact is unlikely to be a great concern. However, there is a listed building adjacent to the site, and development may impact on its settings. The site is currently used as a recreation ground, and the loss of this space may impact negatively on public health and wellbeing unless it is adequately replaced nearby; public health on a development on this site may also be affected by proximity to the motorways.</p>
SSW1 - Land North of Park Lane East	++	+	-	-	0	+	+	-	0	++	++	0	0	0	--	0	<p>The site is estimated to have a capacity of 168-336 dwellings. The site is not located within a flood zone. The site is some distance from the nearest town centre, although it is closer to a large park. The site contains and is adjacent to some listed buildings, and is adjacent to an Historic Park or Garden, which development could impact. The site is elevated and prominent, and located next to the AGLV, making potential landscape character impact a serious concern.</p>
SSW2 - Land at Sandcross Lane	++	+	0	-	0	+	+	-	0	0	0	0	0	0	0	0	<p>The site is estimated to have a capacity of 233-465 dwellings. The site is not located within a flood zone, but a large part of the site is at some risk of surface flooding. The site is some distance from the nearest town centre, although it is closer to some recreation facilities.</p>

SSW3 - King George's Field	++	--	0	-	-	+	+	-	0	++	++	0	0	0	-	0	The site is estimated to have a capacity of 54-108 dwellings. The site is not located within a flood zone. The site is some distance from the nearest town centre, and as the site is currently used a recreation ground, development on this site would reduce access to sport, leisure and exercise opportunities in the surrounding area. The site is also close to the AGLV, making potential landscape character impact a serious concern.
SSW4 - Clayhall Farm	++	+	-	--	0	+	+	--	0	0	0	0	0	0	--	0	The site is estimated to have a capacity of 272-543 dwellings. A small amount of the site falls within a flood zone, and some of the rest of it is at risk of surface flooding. The site is some distance from the nearest town centre, although it is closer to a park and football pitch, which may contribute to increasing activity among residents. The site contains some Grade II listed buildings and curtilages, which development could impact. The site is in an area with long range views, and is adjacent to the AGLV, making potential landscape character impact a serious concern.
SSW5 - Land South of Slipshatch Road	++	+	0	-	0	+	+	-	0	0	0	0	0	0	-	-	The site is estimated to have a capacity of 158-317 dwellings, and is likely to be able to provide additional open space in an area that currently lacks it. A small amount of the site falls within a flood zone, and some of the rest of it is at risk of surface flooding. The site is some distance from the nearest town centre. The site is in an area with long range views, and the size of the development is likely to have some impact on landscape character in this area. The site is also adjacent to an SNCI and area of ancient woodland.
SSW6 - Land West of Castle Drive	+	0	0	-	0	+	+	-	0	+	+	0	0	0	-	0	The site is estimated to have a capacity of 15 dwellings. The site is sequentially preferable in terms of flood risk. The site is close to a local centre, but some distance from the more well-connected Reigate town centre.

SSW7 - Hartswood Nursery	+	+	0	-	0	+	+	-	0	++	++	0	0	0	0	0	The site is estimated to have a capacity of 26 dwellings. The site is not located within a flood zone. The site is some distance from the nearest town centre, although it is closer to a sports centre, which may contribute to increasing activity among residents.
SSW8 - Land at Hartswood Playing Fields	++	--	0	-	-	+	+	-	0	++	++	0	0	0	-	0	The site is estimated to have a capacity of 187 dwellings. The site is not located within a flood zone. The site is close to a local centre, but some distance from the more well-connected Reigate town centre, and as the site is currently used a recreation ground, development on this site would reduce access to sport, leisure and exercise opportunities in the surrounding area. The site is located in a part of the green belt that was rated as a high priority, leading to a potentially significant impact on landscape character.
SSW9 - Land at Dovers Farm	++	+	-	-	0	+	+	-	0	+	+	0	0	0	-	0	The site is estimated to have a capacity of 108 dwellings. Only a small part of the site is located within a flood zone. The site is near a local centre but is some distance from the nearest town centre, although it is closer to a sports centre, which may contribute to increasing activity among residents. The site contains or is adjacent to a number of Grade II listed buildings which may be impacted by development. The site is located in a part of the green belt that was rated as a high priority, leading to a potentially significant impact on landscape character.

SSW10 - Land
East of Dovers
Green Road



The site is estimated to have a capacity of 101 dwellings. The site is not located within a flood zone. The site is near a local centre but is some distance from the nearest town centre, although it is closer to a sports centre, which may contribute to increasing activity among residents. The site contains or is adjacent to a number of listed buildings, but these are isolated from the bulk of the site and unlikely to be affected. The site is partially previously developed, containing houses and nursing home, and densification of this site could be seen as a good use of land.

Strategic Employment Site Allocations

- 4.31. In total, 14 sites were assessed as potential Strategic Employment Sites. All of the sites scored well for economic and employment objectives, as this kind of provision has been identified as something that can benefit the economy of the region.
- 4.32. However, many of the sites scored badly on objectives related to sustainable transport, reduction of greenhouse gases, and improvement of air quality due to being located in rural areas of Horley with limited public transport, and therefore likely to increase the use of cars to travel to and from them. Most sites were also partially or wholly located within flood zones, providing more negative scores. A number of sites were partially located within the Gatwick Open Setting designation, which aims to maintain a separation between the airport and the town of Horley, and were subsequently considered to have very negative impacts on landscape character.
- 4.33. A few sites closer to the town centre and train station received positive scores for sustainable transport due to their relatively high level of accessibility. Two sites received positive scores for reducing land contamination – these sites are currently contaminated, and this would need to be cleaned up before development could go ahead in these areas.
- 4.34. The [Strategic Employment Provision Opportunity Study](#) identified that an employment site in the borough should be a minimum of 20ha in size, a requirement that few of these sites meet. However, as many of the sites are contiguous to one another, there may be a possibility to combine two or more sites into a larger site that fulfils the 20ha requirement.
- 4.35. The chosen alternative is a combination of sites SEH1 and SEH2. While containing some negative elements related to landscape impact and noise and air pollution, the sites score more positively than most of the appraised sites in terms of flooding and sustainable transport, and when combined would provide a site large enough to meet the requirement identified in the Strategic Employment Provision Opportunity Study.
- 4.36. The results of the assessment can be seen in the table below. The individual assessments can be seen in [Appendix K](#).

Strategic Employment Site Allocations																	
Site	Sustainability Objective																Comments
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	
NWH1 - Land at Meath Green Lane	0	0	-	--	0	+	+	-	0	-	-	?	0	-	-	0	The site is a long distance from the existing town centre or employment area, and is likely to significantly increase car use in the area. Large parts of the site are within flood zones, and there are a number of listed buildings and an archaeological area within the site. The introduction of a large business park on the urban rural fringe is likely to damage the landscape character of the area.
NWH2 - Land at Bonehurst Road	0	0	0	0	0	+	+	0	0	--	--	0	0	-	0	0	The majority of the site is located within flood zones, and the site is near to residential properties and a busy main road, possibly leading to problems with noise and air pollution.
SEH1 - Land at Fishers Farm and Bayhome Farm	0	-	0	++	0	+	+	+	0	-	-	0	0	-	0	0	This site is located reasonably close to the town centre and is likely to be accessible by methods of transport other than cars. However, part of the site is located within flood zones, and the site is near to residential properties and a busy main road, possibly leading to problems with noise and air pollution.
SEH2 - Land Between Balcombe Road and Railway, Horley	0	-	0	0	0	+	+	0	0	++	++	0	0	-	--	0	Only a very small amount of this site is located within a flood zone, making it sequentially preferable. However, the site is near to residential properties and a busy main road, possibly leading to problems with noise and air pollution. The site is also entirely within the Gatwick Open Setting, meaning it would have a very detrimental effect on the landscape character of the area by closing the gap between Gatwick and Horley.

SEH3 - Land East of Balcombe Road, Horley	0	0	0	0	-	+	+	0	0	-	-	0	0	-	--	0	Development on this site would lead to the loss of some existing businesses, which may not be a good use of previously developed land. Part of the site is within a flood zone, and the site is near to residential properties and a busy main road, possibly leading to problems with noise and air pollution. The site is also entirely within the Gatwick Open Setting, meaning it would have a very detrimental effect on the landscape character of the area by closing the gap between Gatwick and Horley.
SEH4 - Land off The Close and Haroldslea Drive	--	0	-	++	-	+	+	+	0	-	-	0	+	-	-	-	Development on this site would lead to the loss of some existing houses, which may not be a good use of previously developed land and would negatively impact on housing in the borough. Part of the site is within a flood zone, and the site is near to residential properties and a busy main road, possibly leading to problems with noise and air pollution. The site is also partially within the Gatwick Open Setting, meaning it would have a very detrimental effect on the landscape character of the area by closing the gap between Gatwick and Horley. The site contains some listed buildings and some protected trees. However, the site is also located close to the town centre and is likely to be accessible by methods of transport other than cars. And because of pre-existing contamination on the site, which would need to be cleared up for development to take place, this site would reduce contamination in the borough.

SEH5 - Land West of Burstow Stream	0	0	0	-	0	++	++	-	0	0	0	-	+	-	--	-	This site is difficult to access and likely to significantly increase car use in the area. The site is partially within the Gatwick Open Setting, meaning it would have a very detrimental effect on the landscape character of the area by closing the gap between Gatwick and Horley; and is also in an area of the Rural Surrounds of Horley judged to have high importance in terms of green belt functions. The site is close enough to Gatwick that it may suffer from noise pollution. The site may also have a negative impact on the ecologically poor Burstow Stream nearby. However, only a very small part of the site is within a flood zone, making it sequentially preferable when considering flood risk.
SEH6 - Land at Newstead Hall	0	-	0	0	0	+	+	0	0	--	--	-	0	-	0	--	The entire site is located within a flood zone, and much of the site is covered in dense woodland. The site is also located close to residential properties, and may cause problems relating to air quality and noise pollution, and may have a negative effect on the ecologically poor Burstow Stream nearby.
SEH7 - Land at Wilgers Farm	0	-	-	+	0	+	+	0	0	--	--	-	0	-	0	0	The site is located close to residential properties, and may cause problems relating to air quality and noise pollution, and may have a negative effect on the ecologically poor Burstow Stream nearby. Most of the site is located within a flood zone, and the site contains three listed buildings. The site has previously been earmarked as a potential town park for Horley, and using it for a business park would obviously preclude this leisure and recreation use from coming to fruition. However, the site is reasonably close to the town centre, encouraging travel by methods of transport other than the car.

SEH8 - Land at Farney View Farm	0	0	0	0	0	+	+	0	0	--	--	-	0	-	0	0	The site is located close to residential properties, and may cause problems relating to air quality and noise pollution, and may have a negative effect on the ecologically poor Burstow Stream nearby. Most of the site is located within a flood zone. However, the site is reasonably close to the town centre, encouraging travel by methods of transport other than the car.
SEH9 - Land East of Wilgers Farm	0	0	0	-	0	+	+	-	0	--	--	-	0	-	-	0	This site is some distance from the town centre and likely to significantly increase car use in the area. The site is within an area of the Rural Surrounds of Horley judged to have high importance in terms of green belt functions. The site may also have a negative impact on the ecologically poor Burstow Stream nearby. The entire site is within a flood zone.
SEH10 - Land East of Farney View Farm	0	0	0	--	0	+	+	-	0	--	--	-	0	-	-	0	This site is some distance from the town centre and likely to significantly increase car use in the area. The site is within an area of the Rural Surrounds of Horley judged to have high importance in terms of green belt functions. The site may also have a negative impact on the ecologically poor Burstow Stream nearby. Almost the entire site is within a flood zone.

SEH11 - Land at Harrowsley Green Farm	0	0	-	--	0	++	++	-	0	-	-	-	+	-	--	0	This site is some distance from the town centre and likely to significantly increase car use in the area. The site is within an area of the Rural Surrounds of Horley judged to have high importance in terms of green belt functions. The site may also have a negative impact on the ecologically poor Burstow Stream nearby. Large parts of the site are within a flood zone, and there is a listed building on the site. However, because of pre-existing contamination on the site, which would need to be cleared up for development to take place, this site would reduce contamination in the borough.
SEH12 - Land South of Haroldslea Drive	0	0	--	--	0	++	++	-	0	--	--	-	0	-	--	-	This site is some distance from the town centre and likely to significantly increase car use in the area. The site is within an area of the Rural Surrounds of Horley judged to have high importance in terms of green belt functions. The site may also have a negative impact on the ecologically poor Burstow Stream nearby. Most of the site is within a flood zone, and there is a listed building on the site. The site is close enough to Gatwick that it may suffer from noise pollution issues. The site contains a scheduled ancient monument, three listed buildings, and a potential SNCI, as well as being adjacent to an existing SNCI.

Safeguarding Spatial Options

- 4.37. Five spatial options for safeguarding land beyond the end of the plan period were considered – small, medium, and large urban extensions, and medium and large standalone settlements. All options scored well for housing and employment objectives, the latter due to construction jobs created by the extra housebuilding. All sites scored poor or neutral marks for objectives related to sustainable transport and reduction of greenhouse gases, due to being located at the edges of towns or in rural areas rather than in town centre locations that better encourage walking, cycling, and public transport.
- 4.38. Small and medium urban extensions were considered more positive in terms of landscape impact due to their smaller size and location at the edge of existing built-up areas, as opposed to standalone settlements in the countryside. Small and medium urban extensions were also considered to disperse pressure on the water system more widely. However, larger extensions and standalone settlements were found to have better impacts on health and wellbeing, due to their ability to provide more open space for residents, and possibly to support additional health services. All of the options had the potential to be sustainable, with some mitigation measures put in place.
- 4.39. There was a relatively high amount of missing or unknowable data for this assessment, as the impact on many of the objectives would depend upon the exact location of a site, rather than the general spatial approach chosen.
- 4.40. The most sustainable option is identified through the appraisal process to be Option 5, a large standalone settlement. This option would easily provide the largest number of houses, and the exceptionally large nature of such a site means that a range of employment options, services, and facilities could also be provided. The size of such a site may also make it easier to provide additional public transport, whereas a medium-sized standalone settlement may have problems justifying additional public transport investment due to its comparatively smaller size. The major problem with a large standalone settlement is its impact on the landscape – however, while a large site in the countryside is likely to have a strong impact on landscape character, this is an issue that ultimately depends upon the choice of site. Some sites will have less of a landscape impact, or will find it easier to mitigate their landscape impact than others. As long as the sites are carefully chosen, therefore, this landscape impact problem could be overcome.
- 4.41. The results of the assessment can be seen in the table below. The individual assessments can be seen in [Appendix L](#).

Safeguarding Spatial Options																	
Objective	Sustainability Objective																Comments
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	
1 - Numerous small scale extensions to urban areas	+	-	?	-	+	0	+	-	0	?	?	+	?	0	+	?	Small urban extensions would provide up to 500 new houses each, meaning that several would be needed to contribute to the borough's housing need in the next plan period. Being located at the edge of existing towns, they may be some distance away from established public transport networks and town and local centres, and without the required population to support new public transport or significant levels of retail, employment uses, open space, and services. However, by spreading out new housing across multiple small sites, the impact on water stress and landscape character in the borough may be abated somewhat.
2 - A few medium extensions to urban areas	+	0	?	-	+	+	+	-	0	?	?	+	?	0	+	?	Medium urban extensions would provide between 501 and 700 new houses each, and a few of these could make a reasonable contribution to the borough's housing need in the next plan period. Being located at the edge of existing towns, they may be some distance away from established public transport networks and town and local centres, and without the required population to support new public transport. However, they may be able to support some amount of retail, employment uses, open space, and services, and by spreading out new housing across multiple medium-sized sites, the impact on water stress and landscape character in the borough may be abated somewhat.

3 - A single large extension to an urban area	+ + ?	0	+	++	++	0	0	?	?	?	-	?	0	-	?	<p>A large urban extension would provide between 701 and 1000 new houses each, and could make a significant contribution to the borough's housing need in the next plan period. Being located at the edge of existing towns, it may be some distance away from established public transport networks and town and local centres, although this may be balanced against its ability to sustain a greater level of local retail, open spaces, employment uses, and services compared to smaller extensions. Its additional size is likely to have a more positive impact on the economy, providing both short term construction jobs and some longer term employment opportunities. However, it is likely to have a more significant impact on water resources and landscape character due to its larger size.</p>
4 - Medium standalone settlement	++ + ?	-	-	++	++	0	0	?	?	?	0	?	0	--	?	<p>A medium standalone settlement would provide between 1,000 and 2,000 houses, and have a significant positive impact on the borough's housing need in the next plan period, as well as being able to support a significant amount of retail, employment uses, open space, and services, contributing to the borough's economy. However, being located in the countryside, it is unlikely to involve the use of any previously developed land, and will probably be some distance from existing public transport networks, and without the population required to support new public transport services. A standalone settlement in the countryside is also like to have a significant negative impact on the landscape character wherever it is placed.</p>

5 - Large standalone settlement	++	+	?	0	-	++	++	0	0	?	?	0	?	0	--	?	<p>A medium standalone settlement is expected to provide over 6,000 houses, and have a very significant positive impact on the borough's housing need in the next plan period, as well as being able to support a significant amount of retail, employment uses, open space, and services, contributing to the borough's economy. Being located in the countryside, it is less likely to involve the use of any previously developed land, and will probably be some distance from existing public transport networks, although there may be some possibility of creating new public transport networks around such a significant new population hub. A standalone settlement in the countryside is also like to have a significant negative impact on the landscape character wherever it is placed.</p>
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Safeguarding Sites

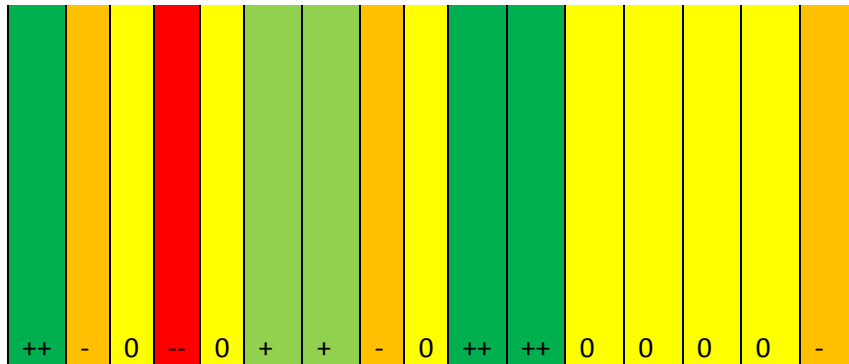
- 4.42. A total of 37 sites were considered for safeguarded land, across all of the five potential spatial options. In this appraisal, the majority of sites received positive scores on objectives related to housing and economic issues, but poorer scores were common for objectives related to sustainable transport, greenhouse gases, and landscape impact. This is related to the distance that most potential safeguarding sites are from town centres, the lack of public transport to these relatively remote areas, and the size of the potential new settlements in rural or suburban edge areas.
- 4.43. Sites in Horley scored particularly poorly, largely due to receiving strong negative scores for flood risk. Sites in South Park and Woodhatch scored badly on sustainable transport and landscape objectives due to their remote locations. Across the rest of the borough, sites were more varied, with a mixture of positive and negative scores on objectives relating to air quality, land contamination, health and wellbeing, and heritage assets.
- 4.44. The chosen alternative is site SAS1. This site could provide significant amounts of housing to meet the needs of the borough in the next plan period if necessary. The site poses a potential problem for landscape character, but is at relatively low flood risk, would involve remediation of contaminated land, and is large enough to provide significant open space and, potentially, additional public transport options when combined with land on the Tandridge side of the border. It is also one of the few sites that could be said to meet the preferred spatial option of a large, standalone settlement.
- 4.45. Notably, these sites are not all large standalone settlements, which was the preferred spatial option. This is in recognition of the fact that the choice on sites has to be a compromise between the preferred spatial option, the sustainability of each site, and the availability of each site; also that the spatial options assessment was undertaken at a generic level, without the benefit of site specific information.
- 4.46. The results of the assessment can be seen in the table below. The individual assessments can be seen in [Appendix M](#).

Safeguarding Site Allocations																		
Site	Sustainability Objective																Comments	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16		
BAN1 - Land North of Croydon Lane	++	-	0	-	0	+	+	-	0	++	++	0	0	0	0	0	0	This site has an estimated capacity of 311 housing units at a density of 30dph. The site scores well for not being located within any flood zones, but receives a bad score for sustainable transport and carbon emissions because its distance from train stations and employment areas is likely to increase car use. On other sustainability issues, the impact of development on this site would be fairly neutral.
BAN2 - Land South of Croydon lane	++	0	0	-	0	+	+	-	0	++	++	0	+	0	--	0	0	This site has an estimated capacity of 328 housing units at a density of 30dph. The site scores well for not being located within any flood zones, but receives a bad score for sustainable transport and carbon emissions because its distance from train stations and employment areas is likely to increase car use. The site may be somewhat contaminated at present, so development here would help to reduce land contamination in the borough. However, the landscape impact of development on this site is likely to be negative due to its location in a narrow gap between settlements.
BAN3 - Land South of Woodmansterne Lane	++	0	0	-	0	+	+	-	0	++	++	0	0	0	--	0	0	This site has an estimated capacity of 187 housing units at a density of 30dph. The site scores well for not being located within any flood zones, but receives a bad score for sustainable transport and carbon emissions because its distance from train stations and employment areas is likely to increase car use. Although the impact of development on most other sustainability issues is likely to be neutral, the landscape impact is likely to be negative due to its location in a narrow gap between settlements.

BAN4 - Land East of Park Road	++	0	-	-	0	+	0	-	0	++	++	0	0	0	--	0	This site has an estimated capacity of 470 housing units at a density of 30dph. The site scores well for not being located within any flood zones, but receives a bad score for sustainable transport and carbon emissions because its distance from train stations and employment areas is likely to increase car use. The site currently contains employment uses that may be lost in any redevelopment, impacting on economic sustainability in the area. There are listed buildings on the site, as well as conservation area and historic park and garden designations, so development may affect these heritage assets. The heritage assets in the south of the site also contribute to the landscape's high sensitivity to change, and development would also substantially alter the landscape by reducing the gap between two settlements.
BAN5 - Land West of Park Road	++	-	-	0	0	+	+	0	0	++	++	0	0	0	-	0	This site has an estimated capacity of 515 housing units at a density of 30dph. The site scores well for not being located within any flood zones, and receives a neutral score for sustainable transport and carbon emissions because of easy access to a road with multiple bus routes as well as proximity to the town centre of Banstead. However, the landscape impact of development on this site is likely to be negative due to the high sensitivity to change of the southern part of the site, which also contains a number of listed buildings and is covered by a conservation area designation.

BAN6 - Land North of Woodmansterne Lane	++	0	0	-	0	+	+	-	0	++	++	0	0	0	-	0	This site has an estimated capacity of 105 housing units at a density of 30dph. The site scores well for not being located within any flood zones, but receives a very bad score for sustainable transport and carbon emissions because its distance from the majority of facilities is likely to increase car use. Development on the site would also be likely to have a negative effect on landscape character in the area by extending the urban area north of Woodmansterne Lane.
BAN7 - Land at Boundary Farm, Woodmansterne	++	0	0	-	0	+	+	-	0	++	++	0	0	0	-	0	This site has an estimated capacity of 154 housing units at a density of 30dph. The site scores well for not being located within any flood zones, but receives a very bad score for sustainable transport and carbon emissions because its distance from the majority of facilities is likely to increase car use. Development on the site would also be likely to have a negative effect on landscape character in the area by extending the urban area north of Woodmansterne Lane.
BAN8 - Land South of Cunningham Road, Woodmansterne	++	-	0	--	0	+	+	-	0	++	++	0	0	0	0	-	This site has an estimated capacity of 122 housing units at a density of 30dph. The site scores well for not being located within any flood zones, but receives a very bad score for sustainable transport and carbon emissions because its distance from the majority of facilities, as well as the distance to local bus services, is likely to increase car use. The site is entirely located within a biodiversity opportunity area, which may create conflict between maximising development opportunities and encouraging opportunities for enhanced biodiversity in the area.

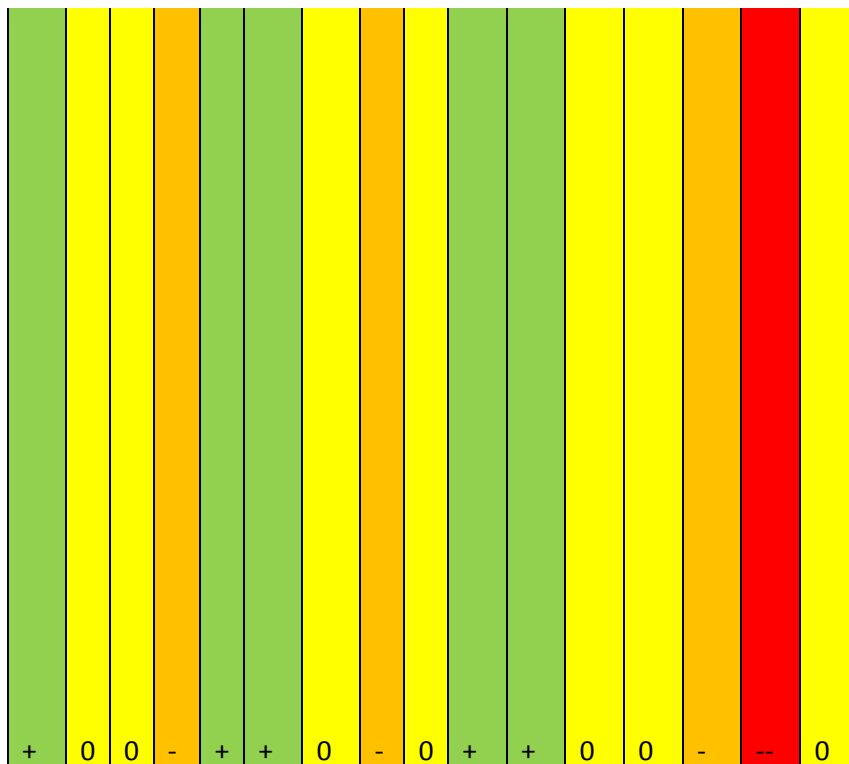
BAN9 - Land Off
Kingscroft Road,
Woodmansterne



This site has an estimated capacity of 187 housing units at a density of 30dph. The site scores well for not being located within any flood zones, but receives a very bad score for sustainable transport and carbon emissions because its distance from the majority of facilities, as well as the distance to local bus services, is likely to increase car use. The site is entirely located within a biodiversity opportunity area, which may create conflict between maximising development opportunities and encouraging opportunities for enhanced biodiversity in the area.

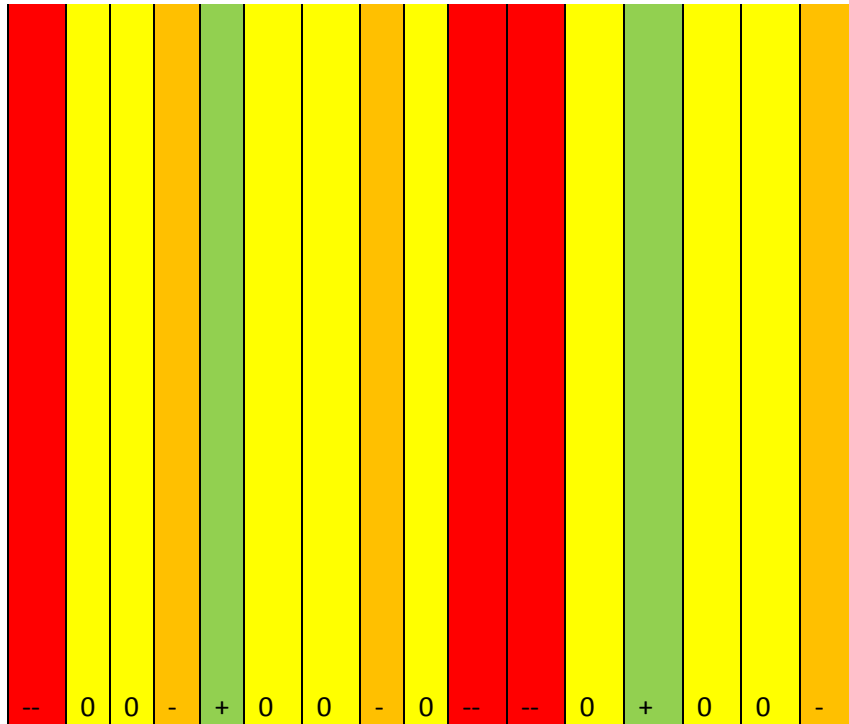
BV12 - Land at Banstead Estate	++	0	0	0	0	++	++	0	0	++	++	0	+	-	--	-	<p>This site has an estimated capacity of 1029 housing units at a density of 30dph. The site scores well for not being located within any flood zones, and receives a neutral score for sustainable transport and carbon emissions because of the very close proximity to a local centre. The size of the site, and the potential to include employment uses and provide a large number of construction jobs during development, gives this site a very high score on economic sustainability issues. The site may be somewhat contaminated at present, so development here would help to reduce land contamination in the borough. However, the landscape impact of development on this site is likely to be very negative due to the high sensitivity to change - the entire site falls within the area of great landscape value designation. The site also scores negatively on noise and air pollution issues due to its proximity to Brighton Road. The site contains a number of areas of ancient woodland, a large group of trees with tree protection orders, and a site of nature conservation importance. Part of the site is within a biodiversity opportunity area, which may create conflict between maximising development opportunities and encouraging opportunities for enhanced biodiversity in the area. This site presents a strong contrast between positive impacts on economic sustainability, and negative environmental impacts.</p>
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HC28 - Land at Meadowcroft, Balcombe Road



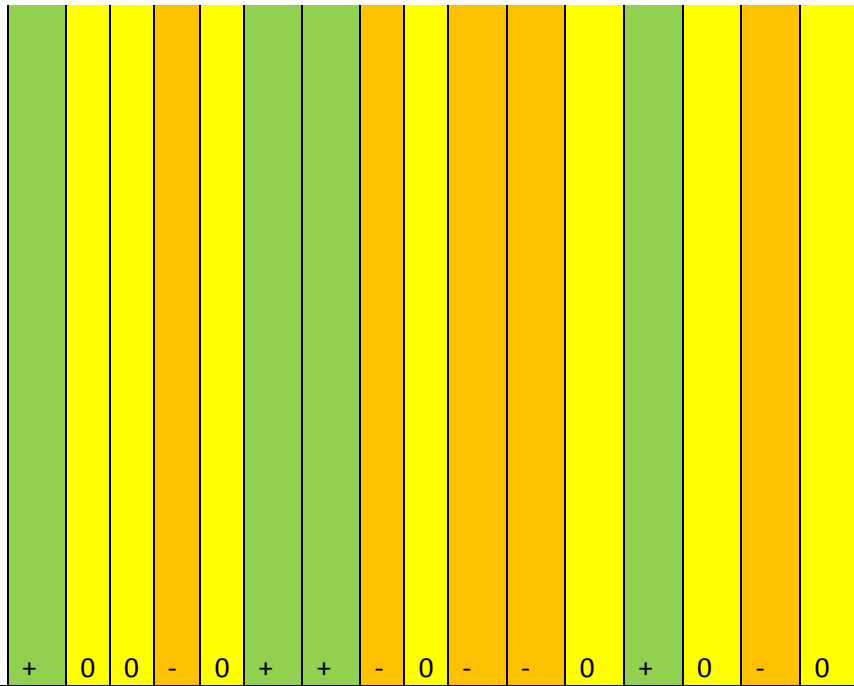
This site has an estimated capacity of 56 housing units at a density of 30dph. The site scores well for not being located within any flood zones, but this is slightly tempered by a relatively large risk of surface flooding. The site receives a bad score for sustainable transport and carbon emissions because its distance from services and limited bus service is likely to increase car use. Redevelopment of this site, which currently contains some commercial uses, could be seen as a positive use of previously developed land if employment uses are provided elsewhere in the borough through the local plan; however, removal of these specific employment uses could also be seen to negatively impact on economic sustainability in the directly surrounding area. The site is located within an air quality management area, and the requirement to not worsen air quality in this area may be a problem for development. Development on this site would be likely to have a significant negative impact on landscape character by reducing the gap between Horley and Gatwick Airport, and removing part of the Gatwick Open Setting that the site falls within.

HE01 - Land at Haroldslea Drive, Horley



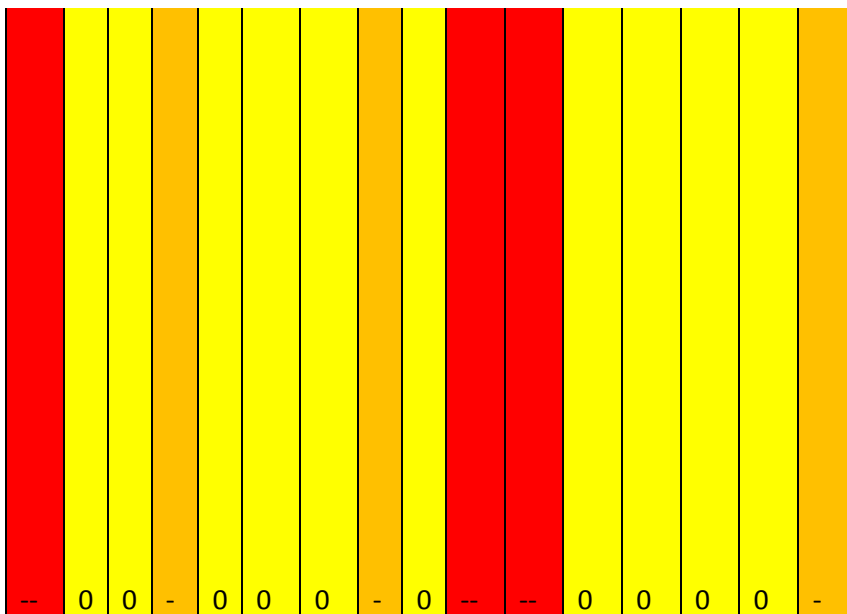
Housing capacity for this site has not been calculated, as the site is not sequentially preferable for housing - the entire site falls within flood zones 2 and 3, and receives very bad scores on housing, flooding, and climate change adaptation issues because of this, as well as having a neutral impact on economic sustainability due to the lack of possible development on the site. The site also scores very badly for sustainable transport and carbon emissions because its distance from the majority of facilities, as well as the distance to local bus services, is likely to increase car use. The site is potentially contaminated at present, so development here would help to reduce land contamination in the borough; and as the site is currently overgrown and contains derelict farm buildings, development on this site may be seen as a positive use of previously developed land that would not have a negative impact on the landscape. The site is partially located within a biodiversity opportunity area, which may create conflict between maximising development opportunities and encouraging opportunities for enhanced biodiversity in the area.

HE05 - Land at Harrowsley Green Farm



Taking into account flood constraints, this site has an estimated capacity of 56 housing units at a density of 30dph. Most of the site falls within flood zones 2 and 3. The site scores badly for sustainable transport and carbon emissions because its distance from the majority of facilities is likely to increase car use. The site is potentially contaminated at present, so development here would help to reduce land contamination in the borough. The site is partially located within a biodiversity opportunity area, which may create conflict between maximising development opportunities and encouraging opportunities for enhanced biodiversity in the area. The site scores negatively for landscape impact because of its very isolated nature within the countryside in an area of medium to high sensitivity to change. The site is partially located within a biodiversity opportunity area, which may create conflict between maximising development opportunities and encouraging opportunities for enhanced biodiversity in the area.

HE09 - Land at
Newstead Hall,
Horley



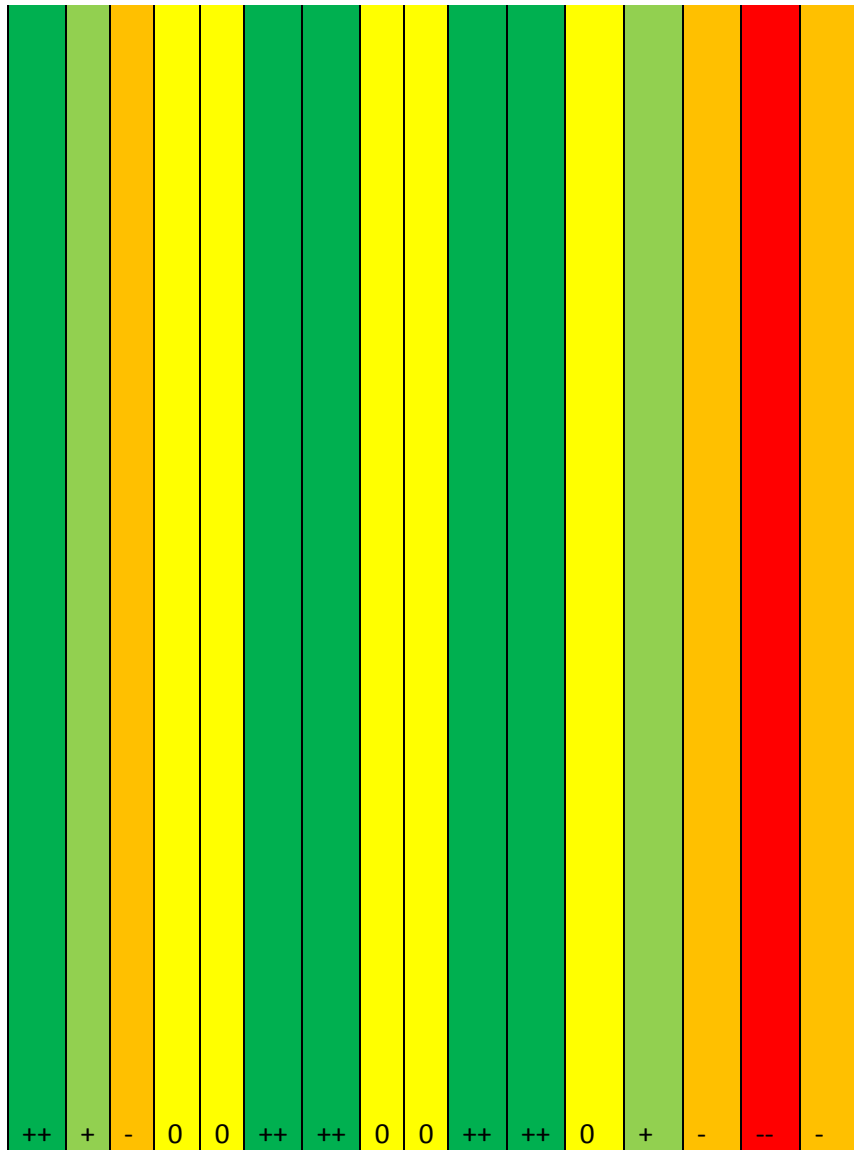
Housing capacity for this site has not been calculated, as the site is not sequentially preferable for housing - the entire site falls within flood zones 2 and 3, and receives very bad scores on housing, flooding, and climate change adaptation issues because of this, as well as having a neutral impact on economic sustainability due to the lack of possible development on the site. The site also scores badly for sustainable transport and carbon emissions because its distance from the majority of facilities, as well as the distance to local bus services, is likely to increase car use. The site is partially located within a biodiversity opportunity area, which may create conflict between maximising development opportunities and encouraging opportunities for enhanced biodiversity in the area. The majority of the site is also covered with trees that have tree protection orders on them, creating a further conflict between environmental protection and development.

HE10 - Land Rear of 17 The Close, Horley	+	0	0	-	0	+	+	-	0	0	0	0	0	-	--	0	<p>Taking into account flood constraints, this site has an estimated capacity of 46 housing units at a density of 30dph. Part of the site falls within flood zones 2 and 3, but there is still a relatively large proportion of the site that can be built on. The site scores badly for sustainable transport and carbon emissions because its distance from the majority of facilities and limited bus service is likely to increase car use. The site is located very close to an air quality management area, and the requirement to not worsen air quality in this area may be a problem for development. The proximity to Gatwick Airport and the A23 road may also have negative noise and air pollution impacts on residents of a development on this site - in particular, the site is within the 57dB noise contour of the airport, which is usually considered a threshold for community noise annoyance. Development on this site would be likely to have a significant negative impact on landscape character by reducing the gap between Horley and Gatwick Airport, and removing part of the Gatwick Open Setting that the site falls within.</p>
HE11 - Land Adjoining 61 Silverlea Gardens, Horley	-	0	-	0	0	0	0	0	0	-	-	0	+	0	0	0	<p>Because of significant flood constraints, this site has an estimated capacity of only 3 housing units at a density of 30dph. Much of the site falls within flood zones 2 and 3. The site will have a neutral impact on economic sustainability due to the lack of possible development on the site. The site receives a neutral score for sustainable transport and carbon emissions because of its relative closeness to facilities. The site contains some listed buildings that are not well-shielded and may be affected by development. The site may be somewhat contaminated at present, so development here would help to reduce land contamination in the borough.</p>

HE14 - Seymour, Haroldslea Drive, Horley	--	-	0	--	0	0	0	-	0	--	--	0	+	0	-	0	<p>Housing capacity for this site has not been calculated, as the site is not sequentially preferable for housing - the entire site falls within flood zones 2 and 3, and receives very bad scores on housing, flooding, and climate change adaptation issues because of this, as well as having a neutral impact on economic sustainability due to the lack of possible development on the site. The site also scores very badly for sustainable transport and carbon emissions because its distance from the majority of facilities, as well as the distance to local bus services, is likely to significantly increase car use - to the extent that the site also scores badly for health issues because of the unlikelihood of residents being able or willing to walk or cycle from this location. The site scores negatively for landscape impact because of its very isolated nature within the countryside in an area of medium to high sensitivity to change. The site may be somewhat contaminated at present, so development here would help to reduce land contamination in the borough.</p>
HE15 – Thor’s Field, Haroldslea Drive, Horley	--	0	0	-	0	0	0	-	0	--	--	0	0	0	0	0	<p>Housing capacity for this site has not been calculated, as the site is not sequentially preferable for housing - the entire site falls within flood zones 2 and 3, and receives very bad scores on housing, flooding, and climate change adaptation issues because of this, as well as having a neutral impact on economic sustainability due to the lack of possible development on the site. The site also scores badly for sustainable transport and carbon emissions because its distance from the majority of facilities, as well as the distance to local bus services, is likely to significantly increase car use. The site is partially located within a biodiversity opportunity area, which may create conflict between maximising development opportunities and encouraging opportunities for enhanced biodiversity in the</p>

																	area.
M21 - Land North of Radstock Way, Merstham	++	-	0	--	-	+	+	-	0	++	++	0	0	-	0	0	<p>This site has an estimated capacity of 77 housing units at a density of 30dph. The site scores well for not being located within any flood zones, but receives a bad score for sustainable transport and carbon emissions because its distance from train stations and employment areas is likely to increase car use. The land is currently used as a recreation ground, the removal of which would affect the health of local residents unless the recreation ground were reprovided somewhere else nearby; this could also be seen as contrary to the objective of using previously developed land to the best effect. The site is located very close to an air quality management area, and the requirement to not worsen air quality in this area may be a problem for development. The proximity to the M23 and M25 motorways may also have negative noise and air pollution impacts on residents of a development on this site.</p>

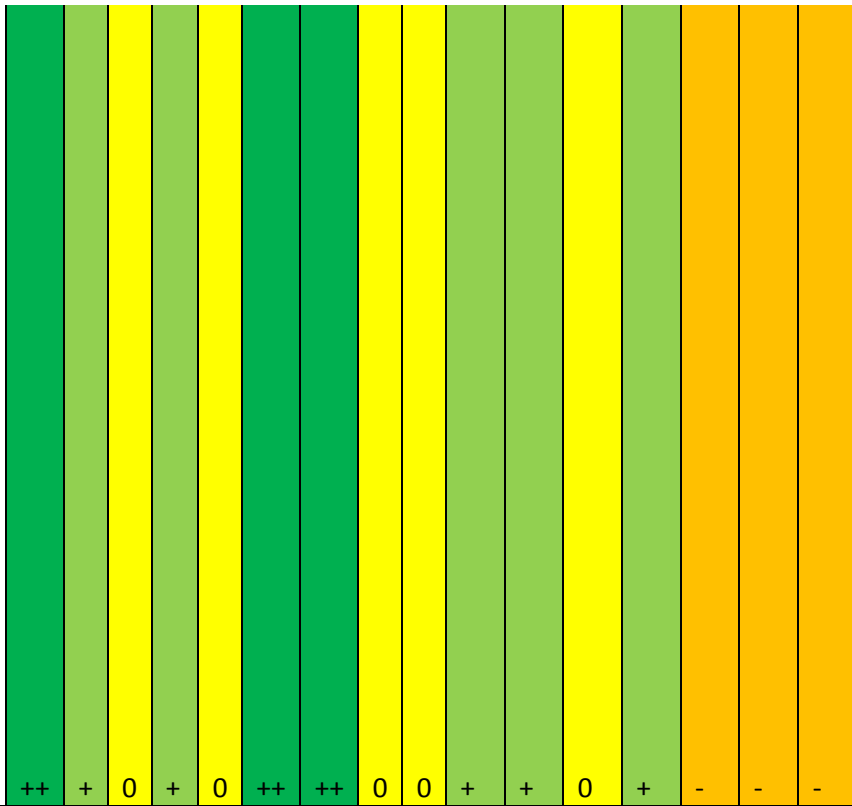
M26 - Land at Chaldon, Alderstead, and Tollsworth Farm



This site has an estimated capacity of 3723 housing units at a density of 30dph. The site scores well for not being located within any flood zones, and for the large amount of employment uses and construction jobs that could be generated by a site of this size. The site is currently some distance from sustainable transport facilities, but a new settlement of significant size could be planned around sustainable travel from the start, and could include significant amounts of open space and recreation and health facilities, having a positive impact on the health of residents of a new development. There are some listed buildings on the site which may be affected by development, and development on the site may also have a negative effect on the nearby Netherne conservation area. A number of areas of ancient woodland, actual and potential sites of nature conservation importance, and sites of special scientific interest fall within the site, and there may be some conflict between biodiversity and conservation needs and the impulse to maximise development. The site is close to the M25 motorway, which may have negative noise and air pollution impacts on residents of a development on this site. The development is likely to have a significant negative impact on landscape character due to the size of the site and its proximity to the village of Netherne - the landscape of the surrounding area would be changed beyond recognition by a development of this size. The entire site falls within the area of great landscape value or area of outstanding natural beauty designations, and development would also impact these important and protected designations. The site may be somewhat contaminated at present, so development here would help to reduce land contamination in the borough.

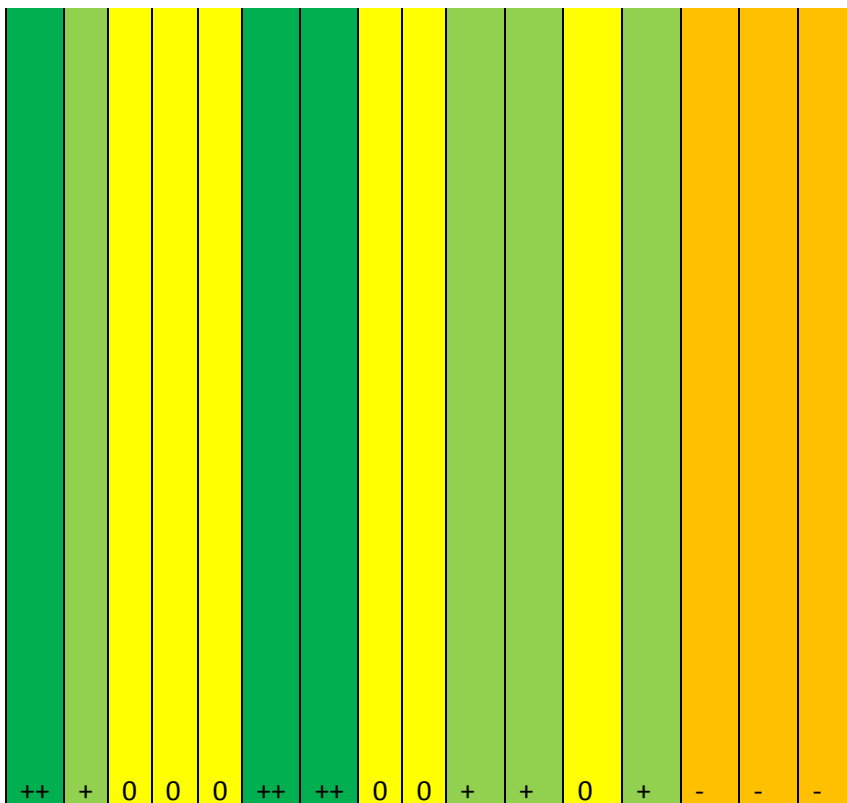
RE19 - Nutfield Lodge, Redhill	+	0	0	-	0	+	+	-	0	++	++	0	+	0	-	0	<p>This site has an estimated capacity of 54 housing units at a density of 30dph. The site scores well for not being located within any flood zones, but receives a bad score for sustainable transport and carbon emissions because its distance from existing facilities is likely to increase car use. The site may be somewhat contaminated at present, so development here would help to reduce land contamination in the borough. The site is very close to a fairly large number of biodiversity assets, including ancient woodland, a biodiversity opportunity area, and a site of nature conservation importance. The impact of development on the landscape character is likely to be negative due to the sloping topography of the site and the close proximity to the area of great landscape value designation.</p>
RE28 - Patteson Court, Nutfield Road, Redhill	+	0	-	-	+	+	0	-	0	++	++	0	0	0	0	0	<p>This site has an estimated capacity of 15 housing units at a density of 30dph. The site scores well for not being located within any flood zones, but receives a bad score for sustainable transport and carbon emissions because its distance from existing facilities is likely to increase car use. The site is very close to some sensitive biodiversity assets, including a biodiversity opportunity area and a site of nature conservation importance. There is a listed building on the site which may be affected by any development on this small and well-contained site. Redevelopment of this site, which currently contains some commercial uses, could be seen as a positive use of previously developed land if employment uses are provided elsewhere in the borough through the local plan; however, removal of these specific employment uses could also be seen to negatively impact on economic sustainability in the directly surrounding area.</p>

SAL1 - Land West of Picketts Lane



This site has an estimated capacity of 1012 housing units at a density of 30dph. The site scores well for only being partially located within any flood zones, and for the large amount of employment uses and construction jobs that could be generated by a site of this size. The very close proximity to Salfords local centre and train station gives this site a good score for sustainable transport and carbon emissions. The site may be somewhat contaminated at present, so development here would help to reduce land contamination in the borough. The site could include significant amounts of open space and recreation and health facilities, having a positive impact on the health of residents of a new development. There are two areas of ancient woodland and a potential site of nature conservation importance within the site. The site is close to a busy railway line and an industrial estate, which may have negative noise and air pollution impacts on residents of a development on this site. Development on the site is likely to have a negative impact on landscape character in the area, due to the high sensitivity to change of much of the site; and due to the size of the site, which would essentially double the size of the existing town of Salfords.

SAL2 - Land South
of Whitebushes
Estate

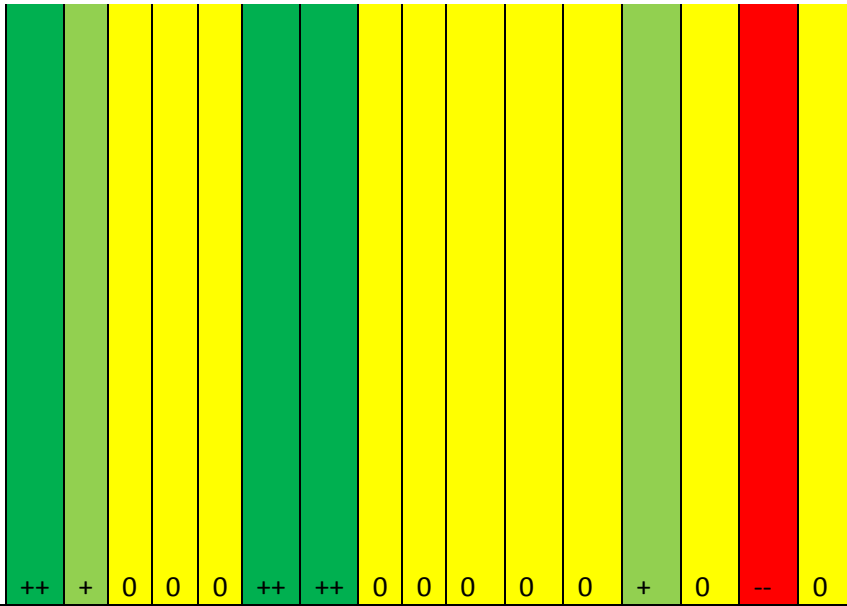


This site has an estimated capacity of 683 housing units at a density of 30dph. The site scores well for only being partially located within any flood zones, and for the large amount of employment uses and construction jobs that could be generated by a site of this size. The site may be somewhat contaminated at present, so development here would help to reduce land contamination in the borough. The site could include significant amounts of open space and recreation and health facilities, having a positive impact on the health of residents of a new development. There is an area of ancient woodland and three potential sites of nature conservation importance within the site. The site is partially located within a biodiversity opportunity area, which may create conflict between maximising development opportunities and encouraging opportunities for enhanced biodiversity in the area. The site is close to a busy railway line and an industrial estate, which may have negative noise and air pollution impacts on residents of a development on this site. Development on the site is likely to have a negative impact on landscape character on the area, due to the size of the site and the amount to which it would reduce the gap between two settlements.

SAL3 - Land North of Honeycrock Lane	++	+	-	+	0	+	+	0	0	+	+	0	+	-	-	0	<p>This site has an estimated capacity of 330 housing units at a density of 30dph. The site scores well for only being partially located within any flood zones. The very close proximity to Salfords local centre and train station gives this site a good score for sustainable transport and carbon emissions. The site may be somewhat contaminated at present, so development here would help to reduce land contamination in the borough. The site could include significant amounts of open space and recreation and health facilities, having a positive impact on the health of residents of a new development. However, there are four listed buildings on the site that may be affected by development. A small amount of the site is within a biodiversity opportunity area, but this area is small enough that it should be possible to develop without damaging biodiversity. The site is close to a busy railway line and an industrial estate, which may have negative noise and air pollution impacts on residents of a development on this site. Development on the site is likely to have a negative impact on landscape character on the area, due to the high sensitivity to change of much of the site; and due to the size of the site, which would significantly reduce the gap between two settlements.</p>
SAL4 - Land East of Masons' Bridge Road	++	0	0	-	0	+	+	-	0	+	+	0	+	0	-	0	<p>This site has an estimated capacity of 391 housing units at a density of 30dph. The site scores well for only being partially located within any flood zones, but receives a bad score for sustainable transport and carbon emissions because its distance from train stations and other facilities is likely to increase car use. The site may be somewhat contaminated at present, so development here would help to reduce land contamination in the borough. Development on the site is likely to have a negative impact on landscape character in the area, due to significantly expanding the size of South Earlswood.</p>

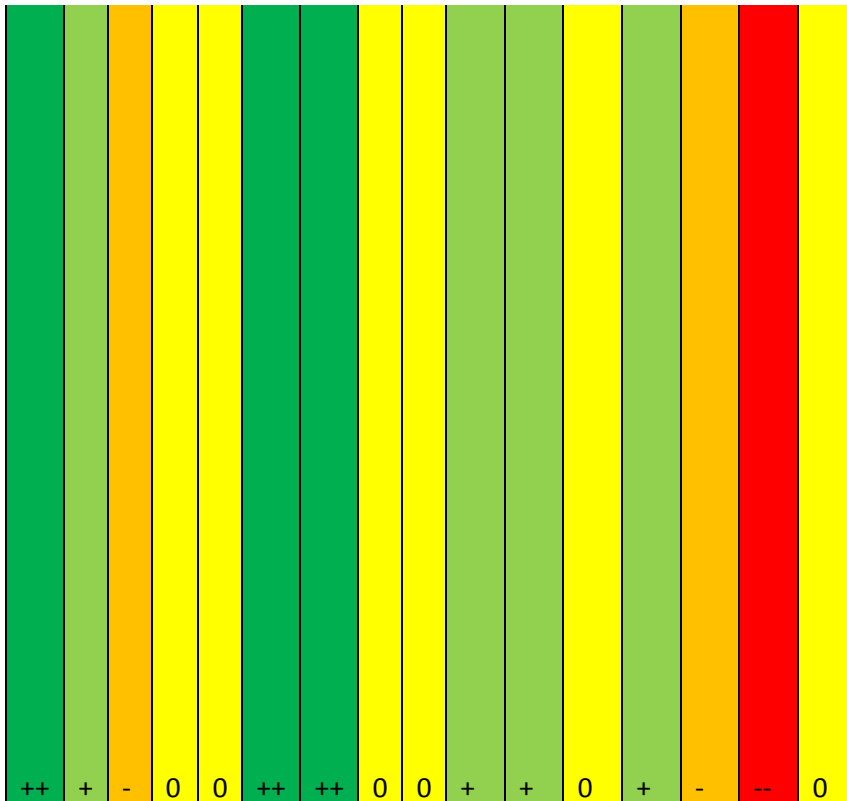
SAL5 - Land West of Montfort Rise	++	+	-	0	0	+	+	0	0	+	+	0	0	0	-	0		<p>This site has an estimated capacity of 242 housing units at a density of 30dph. The site scores well for only being partially located within any flood zones. The site is fairly close to Salfords local centre and train station, and to regular bus services. The site could include some additional open space and would be suitable for walking due to its sustainable location, potentially improving the health of residents. Development on the site is likely to have a negative impact on landscape character on the area, due to the size of the site and the amount to which it would enlarge the town of Salfords, and its location in an area of high sensitivity to change.</p>
SAL6 - Land West of Bonehurst Road	++	0	0	0	0	+	+	0	0	+	+	0	+	-	-	0		<p>This site has an estimated capacity of 344 housing units at a density of 30dph. The site scores well for only being partially located within any flood zones. The site is fairly close to Salfords local centre and train station, and to regular bus services. The site may be somewhat contaminated at present, so development here would help to reduce land contamination in the borough. The site is close to an industrial estate, which may have negative noise and air pollution impacts on residents of a development on this site. Development on the site is likely to have a negative impact on landscape character on the area, due to the size of the site and the amount to which it would enlarge the town of Salfords, the reduction it would cause in the gap between two settlements, and its location in an area of high sensitivity to change.</p>

SAS1 - Redhill
Aerodrome



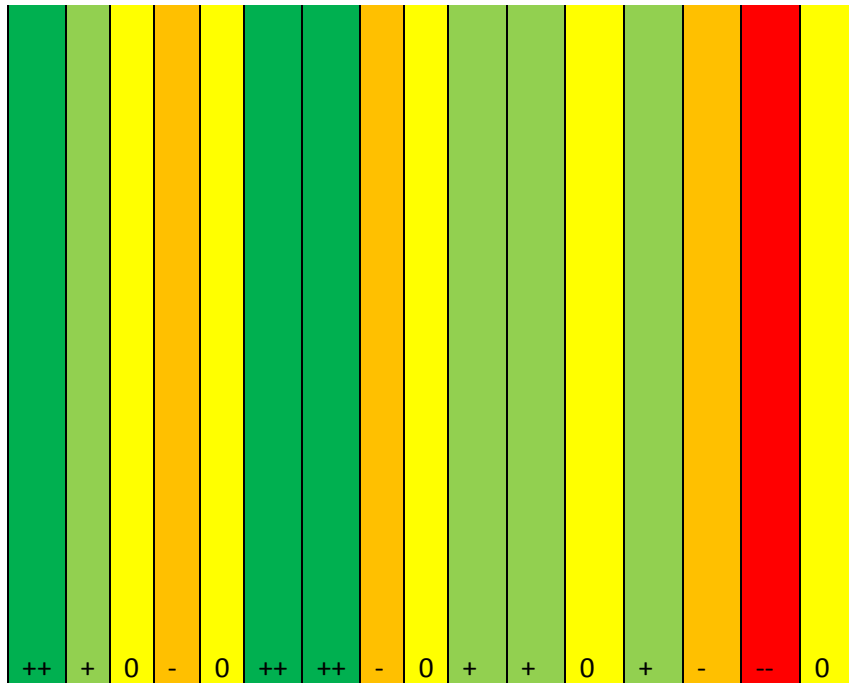
This site has an estimated capacity of 1312 housing units at a density of 30dph. The site scores well for only partially being located within any flood zones, and for the large amount of employment uses and construction jobs that could be generated by a site of this size. The site is currently some distance from sustainable transport facilities, but a new settlement of significant size could be planned around sustainable travel from the start, and could include significant amounts of open space and recreation and health facilities, having a positive impact on the health of residents of a new development. The site may be somewhat contaminated at present, so development here would help to reduce land contamination in the borough. The development is likely to have a significant negative impact on landscape character due to the size of the site in a currently undeveloped area in the countryside.

SAS2 - Land at
Ironsbottom



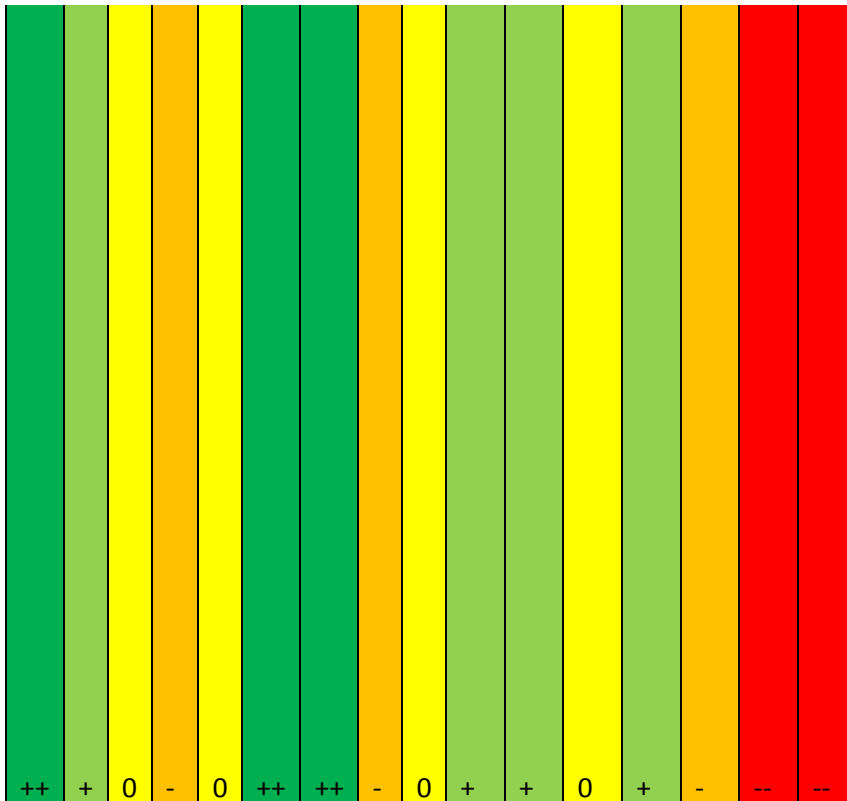
This site has an estimated capacity of 2396 housing units at a density of 30dph. The site scores well for only partially being located within any flood zones, and for the large amount of employment uses and construction jobs that could be generated by a site of this size. The site is currently some distance from sustainable transport facilities, but a new settlement of significant size could be planned around sustainable travel from the start, and could include significant amounts of open space and recreation and health facilities, having a positive impact on the health of residents of a new development. The site may be somewhat contaminated at present, so development here would help to reduce land contamination in the borough. There are a large number of listed buildings on and next to the site, and these may be affected by development. The site is close to the A217, which may have negative noise and air pollution impacts on residents of a development on this site. The development is likely to have a significant negative impact on landscape character due to the size of the site and its proximity to the village of Sidlow - the landscape of the surrounding area would be changed beyond recognition by a development of this size.

SAS3 - Land South of Duxhurst Lane



This site has an estimated capacity of 1250 housing units at a density of 30dph. The site scores well for only partially being located within any flood zones, and for the large amount of employment uses and construction jobs that could be generated by a site of this size. The site is currently some distance from sustainable transport facilities, and access to this site would be difficult due to the narrow country roads. A site of this size could include significant amounts of open space and recreation and health facilities, having a positive impact on the health of residents of a new development. The site may be somewhat contaminated at present, so development here would help to reduce land contamination in the borough. The site is close to the A217, which may have negative noise and air pollution impacts on residents of a development on this site. The development is likely to have a significant negative impact on landscape character due to the size of the site in a currently undeveloped area in the countryside.

SAS4 - Land at
Crutchfield Lane



This site has an estimated capacity of 1046 housing units at a density of 30dph. The site scores well for only partially being located within any flood zones, and for the large amount of employment uses and construction jobs that could be generated by a site of this size. The site is currently some distance from sustainable transport facilities, and access to this site would be difficult due to the narrow country roads. A site of this size could include significant amounts of open space and recreation and health facilities, having a positive impact on the health of residents of a new development. The site may be somewhat contaminated at present, so development here would help to reduce land contamination in the borough. The site is close to the A217, which may have negative noise and air pollution impacts on residents of a development on this site. The development is likely to have a significant negative impact on landscape character due to the size of the site in a currently undeveloped area in the countryside. Large parts of the site are taken up by areas of ancient woodland and actual and potential sites of nature conservation importance, which may introduce a conflict between maximising development and biodiversity and conservation needs.

SAS5 - Duxhurst	++	+	0	0	0	++	++	0	0	+	+	0	+	0	--	-	<p>This site has an estimated capacity of 4692 housing units at a density of 30dph. The site scores well for only partially being located within any flood zones, and for the large amount of employment uses and construction jobs that could be generated by a site of this size. The site is currently some distance from sustainable transport facilities, but a new settlement of significant size could be planned around sustainable travel from the start, and could include significant amounts of open space and recreation and health facilities, having a positive impact on the health of residents of a new development. The site may be somewhat contaminated at present, so development here would help to reduce land contamination in the borough. The site is close to the A217, which may have negative noise and air pollution impacts on residents of a development on this site. The development is likely to have a significant negative impact on landscape character due to the size of the site in a currently undeveloped area in the countryside, and the impact it would have on the village of Sidlow. Large parts of the site are taken up by areas of ancient woodland and actual and potential sites of nature conservation importance, which may introduce a conflict between maximising development and biodiversity and conservation needs.</p>
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SPW09 - Land at Shepherd's Lodge Farm	+	+	0	-	0	+	+	-	0	++	++	0	0	0	--	0	<p>This site has an estimated capacity of 38 housing units at a density of 30dph. The site scores well for having only a very small area of flood zone, and is located near a major park that could encourage healthy activities among residents. The site receives a bad score for sustainable transport and carbon emissions because its distance from train stations and employment areas is likely to increase car use. The development is likely to have a significant negative impact on landscape character due to the size of the site in a currently undeveloped area in the countryside. Development on the site would have a significant negative impact on landscape character due to the sloping topography of the site, the location on a wooded hillside that forms part of the setting of Reigate, and the close proximity of the area of great landscape value designation.</p>
SPW15 - Land North of Slipshatch Road, Reigate	++	-	0	--	0	+	+	-	0	+	+	0	+	0	--	0	<p>This site has an estimated capacity of 296 housing units at a density of 30dph. The site scores well for only partially being located within any flood zones, but receives a very bad score for sustainable transport and carbon emissions because its distance from the majority of facilities and from bus services is likely to increase car use - consequently, it also receives a bad score for health and wellbeing due to the likelihood that residents will not be able or willing to walk or cycle from this site. The site may be somewhat contaminated at present, so development here would help to reduce land contamination in the borough. Development on the site would have a significant negative impact on landscape character due to the close proximity of the area of great landscape value designation and the isolated nature of the site within the countryside.</p>

SPW16 - ASD on The Green, Reigate	+	-	0	--	0	+	+	-	0	+	+	0	0	0	-	--	<p>This site has an estimated capacity of 49 housing units at a density of 30dph. The site scores well for only partially being located within any flood zones, but receives a very bad score for sustainable transport and carbon emissions because its distance from the majority of facilities and from bus services is likely to increase car use - consequently, it also receives a bad score for health and wellbeing due to the likelihood that residents will not be able or willing to walk or cycle from this site. Development on the site would have a significant negative impact on landscape character due to the isolated nature of the site within the countryside. The entire site is within a biodiversity opportunity area and a site of nature conservation importance, which may create conflict between maximising development opportunities and biodiversity and conservation needs.</p>
SPW18 - Paddock, Dovers Green Road, Reigate	+	-	0	--	0	+	+	-	0	0	0	0	0	0	-	0	<p>This site has an estimated capacity of 23 housing units at a density of 30dph. The site scores well for only partially being located within any flood zones, but receives a very bad score for sustainable transport and carbon emissions because its distance from the majority of facilities and from bus services is likely to increase car use - consequently, it also receives a bad score for health and wellbeing due to the likelihood that residents will not be able or willing to walk or cycle from this site. Development on the site would have a significant negative impact on landscape character due to the isolated nature of the site within the countryside. The site is partially within a biodiversity opportunity area, which may create conflict between maximising development opportunities and the need to enhance biodiversity in the area.</p>

Gypsy, Traveller, and Travelling Showperson Site Allocations

- 4.47. The Traveller Site Land Availability Assessment evaluated a wide range of sites, the majority of which were dismissed due to one or more major constraints, leading to the final shortlist of 11 sites assessed here.
- 4.48. The chosen alternatives are sites G3, G4, G9b, and G12. These sites were chosen because of their relatively limited impact on landscape character, and their availability – although they display some sustainability problems that may need mitigating action. In particular, sites G3, G4, and G11 are some distance from the nearest town or local centres, and consideration will need to be given to how residents will access services and facilities. The same sites are also very close to major roads, and mitigating action may need to be taken to reduce the impacts of noise and air pollution on human health and wellbeing.
- 4.49. The results of the assessment can be seen in the table below. The individual assessments can be seen in [Appendix N](#). A summary of the assessments for the selected sites can be seen in [Appendix O](#).

Gypsy, Traveller, and Travelling Showperson Site Allocations																	
Site	Sustainability Objective																Comments
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	
BV16 - Land South of Woodmansterne Lane, Banstead	++	0	--	+	0	0	0	+	0	++	++	0	+	0	--	0	This site would provide up to 15 pitches and is preferable in terms of flood risk. The site is close to the centre of Banstead, and would reduce the need to travel by car. Some contamination would need to be cleaned up before the site could be inhabited. However, the site may have a negative impact on nearby heritage assets, and is located in an extremely narrow landscape gap between Banstead and Woodmansterne.
BV18 - Land South of Croydon Lane, Banstead (Parcel Option A)	++	0	0	+	0	0	0	+	0	++	++	0	0	0	--	0	This site would provide up to 15 pitches and is preferable in terms of flood risk. The site is close to the centre of Banstead, and would reduce the need to travel by car. However, the site may have a negative impact on the narrow landscape gap between Banstead and Woodmansterne.
BV18 - Land South of Croydon Lane, Banstead (Parcel Option B)	++	0	0	+	0	0	0	+	0	++	++	0	0	0	--	0	This site would provide up to 15 pitches and is preferable in terms of flood risk. The site is close to the centre of Banstead, and would reduce the need to travel by car. However, the site may have a negative impact on the narrow landscape gap between Banstead and Woodmansterne.

G3 - Woodlea Stables, Peeks Brook Lane, Horley	+	-	0	--	+	0	0	--	0	0	0	0	+	-	0	0	This site would provide up to 4 pitches, would re-use some previously developed land, and would require contamination to be cleaned up before the site could be inhabited. However, the site is a very long distance from the nearest services and facilities, and would likely increase the need to travel by car significantly. The site is also very close to a motorway, and the air and noise pollution from this road is likely to have a negative health impact on residents.
G4 - Treetops/Trentham, Peeks Brook Lane, Horley	+	-	0	--	+	0	0	--	0	-	-	0	+	-	0	0	This site would provide up to 2 pitches, would re-use some previously developed land, and would require contamination to be cleaned up before the site could be inhabited. However, the site is a very long distance from the nearest services and facilities, and would likely increase the need to travel by car significantly. The site is at risk of flooding. The site is also very close to a motorway, and the air and noise pollution from this road is likely to have a negative health impact on residents.
G6 - Land at Crossoak Lane/Picketts Lane, Horley	++	0	0	-	0	0	0	-	0	0	0	0	0	0	--	0	This site would provide up to 10 pitches, but is located some distance from the nearest services and facilities and would likely increase the need to travel by car. The isolated rural location means the site would also likely have a negative landscape impact.

G9a - Land West of Plot 4, Fairacres, Axes Lane, Salfords	+	0	0	+	0	0	0	+	0	0	0	0	0	0	0	-	0	The site would provide up to 4 plots, and is close to the local centre of Salfords, providing easy access to services and facilities. However, the site is likely to have a negative landscape impact.
G9b – Land South of Fairacres, Axes Lane, Salfords	+	0	0	+	0	0	0	+	0	+	+	0	0	0	0	0	0	The site would provide up to 5 plots, is preferable in terms of flood risk, and is close to the local centre of Salfords, providing easy access to services and facilities.
G11 - Highlands, Blackhorse Lane, Lower Kingswood	+	-	0	-	+	0	0	-	0	++	++	0	0	-	0	0	The site would provide up to 4 pitches, is preferable in terms of flood risk, and would be located on a plot that is partially previously developed. However, the site is some distance from the nearest services and facilities and is likely to increase the need to travel by car. The site is also very close to a motorway, and the noise and air pollution from this road is likely to have negative health impacts.	
G12 - Land at Kents Field, Rectory Lane, Chipstead	+	0	0	0	0	0	0	0	0	++	++	-	0	0	0	0	This site would provide up to 2 pitches, and is preferable in terms of flood risk. However, the site is located in an area at high risk of groundwater contamination, which may be a concern.	
The Old Rectory, Rectory Lane, Woodmansterne	+	0	0	0	0	0	0	0	0	0	0	-	+	0	0	0	This site would provide up to 4 pitches, and contains some contamination which would need to be cleaned up before the site is inhabited. However, the site is located in an area at high risk of groundwater contamination, which may be a concern.	

5. Secondary, Cumulative, and Synergistic Effects

- 5.1. In the previous section of this report, the assessment tables have been read horizontally, to demonstrate the sustainability of each individual site, policy, objective, or spatial option. By reading the tables vertically, we can also see which particular objectives are most likely to be negatively impacted by a particular collection of sites. Where an objective received a number of negative scores in a single assessment, this will be explored in the paragraphs below. This does not apply to the airport parking policy options assessment or the safeguarding spatial options assessment, as only one option was chosen for these assessments. The strategic employment site allocations assessment has also not been considered here, as although two options have been chosen, they are contiguous to one another and essentially form a single site. For the assessments, only sites that were chosen for allocation in the final Development Management Plan document will be considered, as sites that were not allocated cannot contribute to the cumulative impact of the plan.
- 5.2. For clarity, assessment tables containing only the selected sites have been included as [Appendix O](#). Tables have not been included in the appendix for the Development Management Plan objectives and policies, because all of the objectives and policies appraised in the previous section are included in the final Development Management Plan. The comments have been removed from the tables in the appendix to allow the scores to be more easily compared.
- 5.3. Development Management Plan Objectives: The only sustainability objective to score negatively for more than one policy was objective 5, to make the best use of previously developed land. This objective could potentially be impacted by the policies on Traveller sites and cemeteries, as these are very likely to be located on greenfield sites rather than previously developed land. However, these will form a very small proportion of development during the plan period, so the impact should be minimal, and no mitigating action is required.
- 5.4. Development Management Plan Policies: Sustainability objective 5, to make the best use of previously developed land, scored negatively with two policies – back garden development and Traveller sites, as all allocated Traveller sites are on green belt land and back garden land is not considered previously developed. As above, however, these are likely to make up a fairly small proportion of development during the plan period, so the impact will be minimal and no mitigating action is required. Objective 7, to provide suitable employment opportunities scored negatively for the policies on retail warehousing, airport parking, and developing town centre uses outside town centre locations. These three policies all somewhat restrict the development of particular employment uses in particular places, which may somewhat reduce employment opportunities for residents of the borough. However, it is felt that these negative scores are strongly outweighed by the positive scores that

this objective received from most of the other EMP and RET policies, and no mitigating action is required.

- 5.5. Urban Site Allocations: Given the number of sites involved in this assessment (28 urban sites are included in the Development Management Plan), objectives that have only scored negatively for two sites have not been considered, as it is not likely that two relatively small urban sites could have a cumulative negative impact when so many other urban sites score neutrally or positively for the same objective. In any event, criteria based policies in the DMP exist to manage and mitigate a wide range of impacts arising from development, and these will be applied to development across all allocated sites. In general, there are very few concerns about the cumulative impact of the allocated urban sites. Six of the sites scored negatively for objectives 10 and 11, to adapt to climate change and reduce flood risk. These sites should be expected to install SUDS to reduce the risk of flooding, and, where possible, to design development on the site to avoid the areas of worst flood risk. Five sites scored negatively on objective 14, to reduce noise and air pollution, due to being located near to sources of noise and pollution like motorways, major roads, and railway lines. Consideration should be given to appropriate shielding and the design of houses in these developments to reduce noise and air quality impacts where possible.
- 5.6. Sustainable Urban Extension Allocations: These sites present a number of potential cumulative impacts. Three of the sites present potential problems for heritage assets (objective 3), and three of the sites score badly for flooding, and consequently for climate change adaptation as well (objectives 10 and 11), but these impacts should be fairly localised, can be mitigated on a site by site basis via application of criteria based DMP policies, and not have a major cumulative impact across the borough. Six of the sites score negatively for objectives 4 and 8, on reducing the need to travel and promoting sustainable transport modes and reducing greenhouse gas emissions. This is due to the distance of the sites from town and local centres, and the lack of access to public transport, services, and facilities. Mitigation for this issue will involve considering better provision of public transport to these extensions, or designing them to include as many of the relevant services as possible – a solution which would also provide better accessibility to services for those living near the extensions. It should also be noted that there are geographical limitations to new development opportunities in close proximity to the borough's town centres. A number of sites scored badly on objective 14, to reduce noise and air pollution, due to being located near to sources of noise and pollution like motorways and airports. This is again a localised issue, but consideration should be given to appropriate shielding and the design of houses in these developments to reduce noise and air quality impacts where possible. Six of the sites scored badly on objective 15, to protect landscape character, due to being located in various sensitive areas of landscape. Each individual instance of a negative impact on the landscape is, of course, a localised issue – but if a number of sites negatively impact the landscape within a short period of time, the overall character of the borough could be changed, especially as all the extensions would include the removal of land from the green belt. Mitigation against this is provided somewhat by policy MLS1, which aims to phase the urban extensions rather than releasing them for development all at once. However, in addition to this,

sensitive design will be needed on each extension to ensure landscape impact is as limited as possible, and greater density on new developments in urban areas should be considered in order to help the borough meet its housing need without having to release all of the urban extensions for development. Development Management Plan policies requiring good design of new housing, green infrastructure, and open space in new developments will also help to mitigate the landscape impact. Finally, four of the sites scored negatively for objective 16, to protect and enhance biodiversity, due to being located in sensitive areas. The loss of biodiversity is a serious issue, and developments in Biodiversity Opportunity Areas must be required to maintain the current level of biodiversity or, preferably, to deliver a net gain in biodiversity; and all urban extensions should be expected to contribute to a borough-wide network of green infrastructure that can promote biodiversity.

- 5.7. **Safeguarding Sites:** The cumulative impacts of the safeguarded sites are less important at this point, as the sites are not being allocated for development through the DMP, will be further assessed through a subsequent local plan review and will not be developed until at least after the end of the current plan period in 2027. Regardless, only objective 15, to protect landscape character, scored negatively for more than one of the chosen sites. However, this objective scored negatively with all of the sites, and very negatively for one of them. Clearly, the primary cumulative impact of these sites is their potential impact on the countryside, being located in what is currently green belt land in rural locations. The best way to tackle this impact is to try to avoid it becoming an issue in the first place by continuing to encourage sustainable development on brownfield sites in the borough, however in the longer term such opportunities are inevitably going to become more limited. Higher levels of density could also be encouraged on new developments and on redevelopments of existing sites, to increase the borough's ability to meet its housing need without having to turn to the safeguarded sites.
- 5.8. **Gypsy, Traveller, and Travelling Showperson Sites:** Sustainability objective 2, to improve public health, scores negatively for three of these sites, due to their proximity to motorways and the attendant noise and air pollution. The same sites score negatively for objective 14, to reduce air and noise pollution. The overall impact will be fairly small due to the small size of these sites, but consideration should still be given to providing appropriate shielding that could reduce the impact of the motorways on these sites. Three sites also scored negatively on objectives 4 and 8, to reduce the need to travel and encourage sustainable transport modes and to reduce greenhouse gas emissions. This is due to their distance from town and local centres and the services and facilities they contain. Again, the overall impact will be small due to the size of these sites, but consideration should be given as to how access to services and facilities can be provided to these communities without the need for them to use cars to reach local centres. Two sites scored negatively on objective 12, to protect water quality in the borough, due to being located in areas of high sensitivity to groundwater contamination. However, as these sites are contiguous with one another, the problem is isolated to a very small area and will not have a cumulative impact on the whole borough.

- 5.9. One of the major cumulative impact of the policies, objectives, and site allocations contained in the Development Management Plan is likely to be on the landscape character of the borough, and this is primarily due to the potential impact of urban extensions and future development on safeguarded land. The impact will be partially mitigated through the phasing of urban extension sites, as set out in policy MLS1, which allows for urban extension land to only be released for development as and when it is needed to maintain a five year housing land supply, rather than simply releasing it all at once. This will allow greater control over the landscape impact of large new developments. Negative landscape impacts can also be mitigated against by encouraging greater densities on new developments in the urban area, as this will be more likely to allow the borough to meet its agreed housing targets using urban brownfield land only, without the need to release the urban extensions (or, later, the safeguarded land) that would have more of a negative landscape impact. Development Management Plan policies requiring good design of new housing, green infrastructure, and open space in new developments will also help to mitigate the landscape impact.
- 5.10. The [sustainability appraisal](#) of the [Sustainable Urban Extensions Broad Geographic Locations Technical Report](#) also noted that general development in the borough, in combination with the urban extensions, could pose cumulative problems on traffic congestion. The modelling undertaken at this time noted particular sensitivity to congestion at the Woodhatch junction, and throughout Reigate and Redhill. A Strategic Highway Assessment Report undertaken by Surrey County Council for the Development Management Plan considered the ‘worst-case scenario’ (that is, without any mitigation) for traffic impacts as a result of baseline growth plus all the proposed development sites in the Development Management Plan. The report found that the Strategic Employment Site is the primary contributor to cumulative traffic impacts – if the Strategic Employment Site is removed from consideration, traffic impacts over the plan period are significantly reduced and more evenly spread across the borough; if it is included, the impacts are relatively strong, and centred on Horley. Mitigation will therefore need to be identified if the Strategic Employment Site is to be brought forward – this will be more appropriately done at the planning permission application stage, at which point a more site-specific transport assessment can be undertaken, but may include infrastructure improvements or measures to significantly reduce the number of trips generated by the development. The report also identified a number of junctions and stretches of road that will be likely to suffer traffic stress from the proposed developments, and site-specific mitigation measures and infrastructural improvements may need to be identified and undertaken for development sites in these areas.
- 5.11. The sustainability appraisal of the Sustainable Urban Extensions Broad Geographic Locations Technical Report also identified a possible cumulative impact on school places, particularly secondary school places. The Infrastructure Delivery Plan 2017, and the evidence studies informing it, assess the cumulative impact of the development proposed in the Development Management Plan on infrastructure in the borough, including schools, health facilities, and utilities. Infrastructure schemes needed to address these impacts are listed in a schedule in the Infrastructure Delivery Plan, which is also included in the Development Management Plan. These

include new schools and extensions to existing schools, particularly in the Redhill and Merstham area, and new or extended medical centres in Reigate and Horley.

- 5.12. The required infrastructural improvement will be funded by a combination of Community Infrastructure Levy income; funding from the Local Enterprise Partnership, Education Funding Agency, Highways England, and Surrey County Council; and through Section 106 planning obligations and Section 278 highways agreements for site-specific infrastructure.

6. Monitoring

- 6.1. Reigate & Banstead Borough Council produces a number of annual monitoring reports covering a range of areas relevant to plan making and the issue covered in the sustainability appraisal.
- 6.2. The [Annual Monitoring Report](#) combines a wide range of statistics into a single report, covering housing delivery, employment, economic development, environment and sustainability, infrastructure, and regeneration. The [Town and Local Centre Monitors](#) provide information on vacancies and occupiers in town and local centres, and an analysis of the use classes within them. The [Commercial Development Monitor](#) looks at planning permissions and completions of commercial developments and analyses the local commercial property market. The [Industrial Estates Monitor](#) focuses on the uses and vacancies within the dedicated employment areas of the borough. The [Housing Delivery Monitor](#) compares housing delivery to the targets in the plan and provides information on affordable housing delivery and trends in completions and new permissions. The [Environment and Sustainability Monitor](#) looks at planning decisions in heritage areas, development within the green belt and flood risk areas, nature conservation and landscape value, air pollution, nature conservation sites, and local transport projects.
- 6.3. In addition to these regular monitoring reports, a review of the Core Strategy must begin by July 2019, five years since the Core Strategy was adopted. This process will evaluate how well targets in the Core Strategy are being met, and statistics collected during this process will help to show how well the Development Management Plan is being implemented as well. Any sustainability appraisal undertaken during the review process will also require the creation of an updated scoping report, which will provide an opportunity to see what progress has been made on the key indicators since the last report.
- 6.4. Through the process of sustainability appraisal, a number of potential key indicators have emerged to track through these monitoring reports, covering the various likely impacts of development and referring back to a number of the sustainability framework objectives. These indicators include:
 - Affordable housing provision
 - Accessible housing provision
 - Amount of development on previously developed land
 - Amount of development on greenfield sites
 - Transport modal usage
 - Number of trips per day at morning and evening peaks on the strategic road network
 - Carbon dioxide emissions
 - Renewable energy generated
 - Energy efficiency of new build housing

- Water efficiency of new build housing
- Monitoring of air quality
- Quality of biodiversity sites
- Water quality
- Access to open or green space
- Access to sport, leisure, and recreation opportunities
- Available school places compared to need for school places
- Waiting times for GP appointments
- Vacancies in town and local centres
- Vacancies in employment areas