Core Strategy

Sustainability Appraisal Report

APPENDIX F

Appraisal matrices / results from previous appraisals

May 2012

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

There have been a number of iterations of the Core Strategy document, and for each stage there has been a sustainability appraisal carried out and a report produced that has been consulted on alongside the Core Strategy document. The table below shows the SA reports published.

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

This appendix contains the results / matrices from each of the previous SA reports. The most recent appraisal of changes since the outstanding issues consultation in September 2011 can be found in appendix E

Issues & Options October 2005

The Issues and Options SA report was published in November 2005.

When the Sustainability Appraisal was carried out

The SA Peer Review of the Core Strategy Draft Issues and Options was carried out on 10th and 11th October 2005.

Who carried out the Sustainability Appraisal Peer Review?

The Sustainability Appraisal Peer Review was carried out by:

- Paul Newdick – Tandridge District Council
- Matthew Chapman – Tandridge District Council
- Nicholas Perins – Elmbridge Borough Council
- Paul Haynes – Elmbridge Borough Council
- Tom Jones – Independent Consultant

RESULTS AND RECOMMENDATIONS

	A. Housing location and density (in order to meet housing targets)								
	A1. Allow only lower density housing (detached houses) in the Borough which would necessitate some new housing within the Greenbelt.			**A2.** Allow a mix of mainly higher density housing (terraces, townhouses and flats) within urban areas throughout the Borough (thereby safeguarding the Greenbelt)			**A3.** Allow very high-density housing (flats) in areas of high public transport accessibility and a mix of mainly higher densities within other urban areas throughout the Borough (thereby safeguarding the greenbelt).		
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	S		This may fail to deliver an adequate supply of affordable housing.	S		Provides a greater range of housing to meet a range of needs.	S		Predominance of flats may have a detrimental impact on the supply of family housing, by pushing up the prices.
	M	?		M	+		M	+	
	L			L			L		
2. To facilitate the improved health and wellbeing of the whole population, including enabling people to stay independent.	S		Scored poorly on accessibility but good on open space.	S		Allows more flexibility. Policy steering in terms of quality of landscape.	S		Provides good access but doesn't provide for everybody.
	M	-		M	+ +		M	+	
	L			L			L		
3. To reduce poverty and social	S		Developing a monoculture that	S			S		Uncertain of the effects on the

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exclusion.	M -- would not deliver additional services and would not improve accessibility to facilities.	M +	M + social makeup on town centres i.e. Elderly and young – throwing families out into the urban fringe.
	L	L	L ?
4. To create and maintain safer and more secure communities.	S	S	S
	M 0 May not help with natural surveillance. More cars would have impact in road safety.	M + + Mix of housing types will assist in providing a mixed community.	M ? Causing more tensions. Could help with designing out crime – natural surveillance.
	L	L	L
5. To minimise the harm from flooding.	S	S	S
	M - Development in greenbelt will disrupt natural drainage.	M ? Opportunity to improve drainage / water management on brownfield sites.	M ? Need to minimise amount of hard surfacing.
	L	L	L
6. To make best use of previously developed land and existing buildings, encouraging sustainable	S	S	S
	M --	M +	M +

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construction.	L			L			L		
7. To reduce land contamination and safeguard soil quality and quantity.	S			S			S		Opportunities to make remediation financially viable through high-density developments in areas noted for contamination.
	M	--		M	+		M	+	
	L			L			L		
8. To ensure air quality continues to improve and noise/light production is reduced.	S		Introducing housing into the GreenBelt will add to light pollution, and noise.	S		Less car use, if public transport used.	S		Less car use, if public transport used.
	M	-		M	?		M	?	
	L			L			L		
9. To conserve and enhance biodiversity within the plan area.	S		Reduces biodiversity but building is not likely to happen in designated wildlife areas.	S		Opportunity to mitigate the impact.	S		Opportunity to mitigate the impact.
	M	-		M	-		M	-	
	L			L			L		
10. To protect, enhance and, where	S		Protects existing urban areas.	S		Opportunities by	S		Opportunities by developing to

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appropriate, make accessible the natural, archaeological and historic environments and cultural assets, for the benefit of both residents and visitors.	M	0	Does not do anything towards Borough's cultural assets.	M	-	developing to retain the best features through sensitive design. Risks the existing historic character.	M	-	retain the best features through sensitive design. Risks the existing historic character.
	L			L			L		
11. To reduce road congestion and pollution levels.	S		More car use required.	S		More opportunity for access to public transport.	S		More opportunity for access to public transport.
	M	-		M	+		M	+	
	L			L			L		
12. To address the causes of climate change through reducing emissions of greenhouse gases and ensure that the District is prepared for its impacts [could include aviation and road transport].	S		More car use required. Less opportunity for energy efficiency measures.	S			S		Opportunity for community heating schemes. Possible long term impacts on quality of urban living in a warmer climate.
	M	-		M	+		M	+	
	L			L			L	?	
13. Maintain low rates of unemployment and high levels of economic activity.	S		The use of greenfield sites would take pressure away from releasing employment	S			S		
	M	+		M	-		M	-	

	A. Housing location and density (in order to meet housing targets)								
	A1. Allow only lower density housing (detached houses) in the Borough which would necessitate some new housing within the Greenbelt.			**A2.** Allow a mix of mainly higher density housing (terraces, townhouses and flats) within urban areas throughout the Borough (thereby safeguarding the Greenbelt)			**A3.** Allow very high-density housing (flats) in areas of high public transport accessibility and a mix of mainly higher densities within other urban areas throughout the Borough (thereby safeguarding the greenbelt).		
	L		sites for housing.	L			L		
14. Provide for appropriate commercial development opportunities to meet the needs of the economy.	S			S			S		
	M	N/A		M	N/A		M	N/A	
	L			L			L		
15. Provide additional commercial development in urban areas [stimulating economic revival in priority regeneration areas].	S			S		High quality development will help improve the attractiveness of town centres thereby encouraging investment.	S		High quality development will help improve the attractiveness of town centres thereby encouraging investment.
	M	0		M	+		M	+	
	L			L			L		
16. Balancing the needs for employment and housing to reduce the need to travel.	S			S		More opportunity for mixed-use development. Provision of key worker units may be possible.	S		Provision of key worker units may be possible. Long term may risk loss of employment base.
	M	-		M	++		M	+	
	L			L	?		L	?	

	A. Housing location and density (in order to meet housing targets)		
	A1. Allow only lower density housing (detached houses) in the Borough which would necessitate some new housing within the Greenbelt.	**A2.** Allow a mix of mainly higher density housing (terraces, townhouses and flats) within urban areas throughout the Borough (thereby safeguarding the Greenbelt)	**A3.** Allow very high-density housing (flats) in areas of high public transport accessibility and a mix of mainly higher densities within other urban areas throughout the Borough (thereby safeguarding the greenbelt).
17. To reduce the global, social and environmental impact of consumption of resources.	S M - L	S M + L	S M + + L Improved energy efficiency, reduced ecological footprint.
18. To reduce waste generation and disposal, and achieve the sustainable management of waste.	S M ? L Greater space to store recycling. Greater opportunity to compost food waste, but increased green waste.	S M ? L	S M ? L Efficiency of waste collection.
19. To maintain and improve the water quality of the region's rivers and groundwater, and to encourage the sustainable use of water.	S M ? L Larger houses tend to use more water, but this impact could be lessened by water butts.	S M ? L	S M ? L More concentrated water use and pollution risks.
20. To increase energy efficiency.	S	S	S Possibility of CHP.

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	M 0	M +	M ++
	L	L	L
21. To increase the production and use of renewable energy/fuels.	S	S	S
	M ?	M +	M ++
	L +	L	L
	Until there is a threshold for developers to provide renewable fuels on a single property level.	Some opportunities for use of renewable fuels.	The larger the development, the greater the scope for renewable fuels.

Summary: Option A2 and A3 scored similarly against the sustainability framework, both protecting the Green Belt through concentrating higher density housing on previously developed land. Both options help to reduce the need for car travel, because they cluster homes close to a wide range of facilities, also many of the Borough's urban areas are relatively well-served by public transport enabling travel further afield. However, Option A2 has distinct benefits over A3 by virtue of the provision of more varies accommodation, which is more likely to meet the wider needs of the Borough's population, especially those of young families. Option A2 could be enhanced by ensuring that development is allied to public transport provision and at a density sufficiently high (40+ dph) to create potential viability for combined heat and power. Additionally, mitigating measures should be employed to protect and enhance both the historic and natural environment within these urban areas.

	B. Affordable Housing				
	B1a. Lower the threshold size at which new housing developments are required to provide affordable housing.			**B1b.** *Do not* lower the threshold size at which new housing developments are required to provide affordable housing.	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	S		The threshold at which the obligation occurs is critical, otherwise there is a risk that supply will be choked off, as sites become less viable.	S		In the longer term supply of large sites will decline therefore reducing the number of affordable units.
	M	+ +		M	+	
	L			L	-	
2. To facilitate the improved health and wellbeing of the whole population, including enabling people to stay independent.	S		Greater number of affordable units leading to reduced overcrowding etc	S		
	M	+ +		M	+	
	L			L	_	
3. To reduce poverty and social exclusion.	S		Added benefit of more mixed community (greater integration through smaller sites)	S		
	M	+ +		M	+	
	L			L	_	
4. To create and maintain safer and	S		Improved social mix and opportunities for	S		

	B. Affordable Housing				
	B1a. Lower the threshold size at which new housing developments are required to provide affordable housing.			**B1b.** *Do not* lower the threshold size at which new housing developments are required to provide affordable housing.	
more secure communities.	M	+	improved accommodation leading to reduced crime levels.	M	0
	L			L	
5. To minimise the harm from flooding.	S			S	
	M	N/A		M	N/A
	L			L	
6. To make best use of previously developed land and existing buildings, encouraging sustainable construction.	S			S	
	M	N/A		M	N/A
	L			L	
7. To reduce land contamination and safeguard soil quality and quantity.	S			S	
	M	N/A		M	N/A
	L			L	

	B. Affordable Housing					
	B1a. Lower the threshold size at which new housing developments are required to provide affordable housing.			**B1b.** *Do not* lower the threshold size at which new housing developments are required to provide affordable housing.		
8. To ensure air quality continues to improve and noise/light production is reduced.	S			S		
	M	N/A		M	N/A	
	L			L		
9. To conserve and enhance biodiversity within the plan area.	S			S		
	M	N/A		M	N/A	
	L			L		
10. To protect, enhance and, where appropriate, make accessible the natural, archaeological and historic environments and cultural assets, for the benefit of both residents and visitors.	S			S		
	M	N/A		M	N/A	
	L			L		
11. To reduce road congestion and	S			S		

	B. Affordable Housing			
	B1a. Lower the threshold size at which new housing developments are required to provide affordable housing.		**B1b.** *Do not* lower the threshold size at which new housing developments are required to provide affordable housing.	
pollution levels.	M	NA	M	NA
	L		L	
12. To address the causes of climate change through reducing emissions of greenhouse gases and ensure that the District is prepared for its impacts [could include aviation and road transport].	S		S	
	M	NA	M	NA
	L		L	
13. Maintain low rates of unemployment and high levels of economic activity.	S		Greater number of key workers likely to increase labour supply	S	
	M	+		M	0
	L			L	

	B. Affordable Housing					
	B1a. Lower the threshold size at which new housing developments are required to provide affordable housing.			**B1b.** *Do not* lower the threshold size at which new housing developments are required to provide affordable housing.		
14. Provide for appropriate commercial development opportunities to meet the needs of the economy.	S			S		
	M	N /A		M	N /A	
	L			L		
15. Provide additional commercial development in urban areas [stimulating economic revival in priority regeneration areas].	S			S		
	M	N /A		M	N /A	
	L			L		
16. Balancing the needs for employment and housing to reduce the need to travel.	S			S		
	M	N /A		M	N /A	
	L			L		
17. To reduce the global, social and environmental impact of consumption of resources.	S			S		
	M	N /A		M	N /A	

	B. Affordable Housing				
	B1a. Lower the threshold size at which new housing developments are required to provide affordable housing.			**B1b.** *Do not* lower the threshold size at which new housing developments are required to provide affordable housing.	
	L			L	
18. To reduce waste generation and disposal, and achieve the sustainable management of waste.	S			S	
	M	N /A		M	N /A
	L			L	
19. To maintain and improve the water quality of the region's rivers and groundwater, and to encourage the sustainable use of water.	S			S	
	M	N /A		M	N /A
	L			L	
20. To increase energy efficiency.	S			S	
	M	N /A		M	N /A
	L			L	
21. To increase the production and	S			S	

	B. Affordable Housing		
	B1a. Lower the threshold size at which new housing developments are required to provide affordable housing.		**B1b.** *Do not* lower the threshold size at which new housing developments are required to provide affordable housing.
use of renewable energy/fuels.	M	N/A	M	N/A
	L		L	

Summary: Option B1a is much more likely to provide an increased and long-term supply of affordable housing; it will also provide it in such a way that the risk of social stratification is reduced to a minimum. The option of doing nothing neither addresses the immediate short-fall of affordable housing, nor the likelihood that supply will falter due to the reduction in larger sites.

	B. Affordable Housing		
	B2a. Increase the percentage of affordable housing required on new housing developments that trigger the threshold.		**B2b.** *Do not* increase the percentage of affordable housing required on new housing developments that trigger the threshold.
1. To provide sufficient housing to	S		More affordable housing will be delivered, but too	S		In the longer term supply of large sites will

	B. Affordable Housing				
	B2a. Increase the percentage of affordable housing required on new housing developments that trigger the threshold.			**B2b.** *Do not* increase the percentage of affordable housing required on new housing developments that trigger the threshold.	
enable people to live in a home suitable to their needs and which they can afford.	M	+ +	high a percentage could affect viability	M	+	decline therefore reducing the number of affordable units.
	L			L	-	
2. To facilitate the improved health and wellbeing of the whole population, including enabling people to stay independent.	S		Greater number of affordable units leading to reduced overcrowding etc	S		
	M	+ +		M	+	
	L			L	-	
3. To reduce poverty and social exclusion.	S		Social mix opportunity reduced, but the provision of more affordable units nonetheless is positive	S		Number of affordable units does not increase, but the social mix is better balanced.
	M	+		M	+	
	L	?		L		
4. To create and maintain safer and more secure communities.	S		Depends on the mix and integration within the site	S		
	M	?		M	0	
	L			L		
5. To minimise the harm from	S			S		

	B. Affordable Housing			
	B2a. Increase the percentage of affordable housing required on new housing developments that trigger the threshold.		**B2b.** *Do not* increase the percentage of affordable housing required on new housing developments that trigger the threshold.	
flooding.	M	N/A	M	N/A
	L		L	
6. To make best use of previously developed land and existing buildings, encouraging sustainable construction.	S		S	
	M	N/A	M	N/A
	L		L	
7. To reduce land contamination and safeguard soil quality and quantity.	S		S	
	M	N/A	M	N/A
	L		L	
8. To ensure air quality continues to improve and noise/light production is reduced.	S		S	
	M	N/A	M	N/A
	L		L	

	B. Affordable Housing				
	B2a. Increase the percentage of affordable housing required on new housing developments that trigger the threshold.			**B2b.** *Do not* increase the percentage of affordable housing required on new housing developments that trigger the threshold.	
9. To conserve and enhance biodiversity within the plan area.	S			S	
	M	N/A		M	N/A
	L			L	
10. To protect, enhance and, where appropriate, make accessible the natural, archaeological and historic environments and cultural assets, for the benefit of both residents and visitors.	S			S	
	M	N/A		M	N/A
	L			L	
11. To reduce road congestion and pollution levels.	S			S	
	M	N/A		M	N/A
	L			L	
12. To address the causes of	S			S	

	B. Affordable Housing				
	B2a. Increase the percentage of affordable housing required on new housing developments that trigger the threshold.			**B2b.** *Do not* increase the percentage of affordable housing required on new housing developments that trigger the threshold.	
climate change through reducing emissions of greenhouse gases and ensure that the District is prepared for its impacts [could include aviation and road transport].	M	N/A		M	N/A
	L			L	
13. Maintain low rates of unemployment and high levels of economic activity.	S		Greater number of key workers likely to increase labour supply	S	
	M	+		M	0
	L			L	
14. Provide for appropriate commercial development opportunities to meet the needs of the economy.	S			S	
	M	N/A		M	N/A
	L			L	
15. Provide additional commercial development in urban areas [stimulating economic revival in priority regeneration areas].	S			S	
	M	N/A		M	N/A
	L			L	

	B. Affordable Housing					
	B2a. Increase the percentage of affordable housing required on new housing developments that trigger the threshold.			**B2b.** *Do not* increase the percentage of affordable housing required on new housing developments that trigger the threshold.		
16. Balancing the needs for employment and housing to reduce the need to travel.	S			S		
	M	N/A		M	N/A	
	L			L		
17. To reduce the global, social and environmental impact of consumption of resources.	S			S		
	M	N/A		M	N/A	
	L			L		
18. To reduce waste generation and disposal, and achieve the sustainable management of waste.	S			S		
	M	N/A		M	N/A	
	L			L		
19. To maintain and improve the water quality of the region's rivers and groundwater, and to encourage the sustainable use of water.	S			S		
	M	N/A		M	N/A	

	B. Affordable Housing					
	B2a. Increase the percentage of affordable housing required on new housing developments that trigger the threshold.			**B2b.** *Do not* increase the percentage of affordable housing required on new housing developments that trigger the threshold.		
	L			L		
20. To increase energy efficiency.	S			S		
	M	N /A		M	N /A	
	L			L		
21. To increase the production and use of renewable energy/fuels.	S			S		
	M	N /A		M	N /A	
	L			L		

Summary: Option B2a like Option B1a increases the overall provision of affordable housing, however the degree of social stratification will be worse. Also the viability and longer-term supply could be affected as a result of the higher financial burden on specific sites. A continuation of the existing threshold means that the longer-term supply is at risk, as the number of these larger sites is finite.

	B. Affordable Housing				
	B3a. Provide affordable housing on Greenfield sites as an exception to current policy.			**B3b.** *Do not* provide affordable housing on Greenfield sites as an exception to current policy.	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	S			S	
	M	+		M	0
	L			L	
2. To facilitate the improved health and wellbeing of the whole population, including enabling people to stay independent.	S		Improved access to open space facilitates healthy lifestyles	S	
	M	+		M	0
	L			L	
3. To reduce poverty and social exclusion.	S		Sites in the urban fringe may be less accessible to services and facilities	S	
	M	?		M	+
	L			L	
4. To create and maintain safer and more secure communities.	S			S	
	M	?		M	0
	L			L	
5. To minimise the harm from	S		Could be mitigated by policy measures to manage	S	

	B. Affordable Housing					
	B3a. Provide affordable housing on Greenfield sites as an exception to current policy.			**B3b.** *Do not* provide affordable housing on Greenfield sites as an exception to current policy.		
flooding.	M	-	run-off	M	0	
	L			L		
6. To make best use of previously developed land and existing buildings, encouraging sustainable construction.	S			S		
	M	--		M	0	
	L			L		
7. To reduce land contamination and safeguard soil quality and quantity.	S		Any development of a greenfield site will have a detrimental effect	S		
	M	-		M	0	
	L			L		
8. To ensure air quality continues to improve and noise/light production is reduced.	S		Any development of a greenfield site will have a detrimental effect	S		
	M	-		M	0	
	L			L		
9. To conserve and enhance biodiversity within the plan area.	S		Any development of a greenfield site will have a detrimental effect	S		
	M	-		M	0	

	B. Affordable Housing					
	B3a. Provide affordable housing on Greenfield sites as an exception to current policy.			**B3b.** *Do not* provide affordable housing on Greenfield sites as an exception to current policy.		
	L			L		
10. To protect, enhance and, where appropriate, make accessible the natural, archaeological and historic environments and cultural assets, for the benefit of both residents and visitors.	S		Any development of a greenfield site will have a detrimental effect	S		
	M	-		M	0	
	L			L		
11. To reduce road congestion and pollution levels.	S		Likely to increase car use	S		
	M	-		M	0	
	L			L		
12. To address the causes of climate change through reducing emissions of greenhouse gases and ensure that the District is prepared for its impacts [could include aviation and road transport].	S			S		
	M	?		M	0	
	L			L		
13. Maintain low rates of unemployment and high levels of economic activity.	S		Could reduce pressure for homes on employment sites	S		
	M	0		M	0	
	L			L		

	B. Affordable Housing				
	B3a. Provide affordable housing on Greenfield sites as an exception to current policy.			**B3b.** *Do not* provide affordable housing on Greenfield sites as an exception to current policy.	
14. Provide for appropriate commercial development opportunities to meet the needs of the economy.	S			S	
	M	N /A		M	N /A
	L			L	
15. Provide additional commercial development in urban areas [stimulating economic revival in priority regeneration areas].	S			S	
	M	N /A		M	N /A
	L			L	
16. Balancing the needs for employment and housing to reduce the need to travel.	S		Likely to increase the need to travel	S	
	M	-		M	0
	L			L	
17. To reduce the global, social and environmental impact of consumption of resources.	S		Increase ecological footprint	S	
	M	-		M	0

	B. Affordable Housing		B. Affordable Housing (cont.)	
	B3a. Provide affordable housing on Greenfield sites as an exception to current policy.		**B3b.** *Do not* provide affordable housing on Greenfield sites as an exception to current policy.	
	L		L	
18. To reduce waste generation and disposal, and achieve the sustainable management of waste.	S		S	
	M	0	M	0
	L		L	
19. To maintain and improve the water quality of the region's rivers and groundwater, and to encourage the sustainable use of water.	S		S	
	M	N/A	M	N/A
	L		L	
20. To increase energy efficiency.	S		S	
	M	0	M	0
	L		L	
21. To increase the production and	S		S	

	B. Affordable Housing				
	B3a. Provide affordable housing on Greenfield sites as an exception to current policy.			**B3b.** *Do not* provide affordable housing on Greenfield sites as an exception to current policy.	
use of renewable energy/fuels.	M	0		M	0
	L			L	
Summary: Option B3a, although providing affordable homes in idyllic environments, otherwise create significant problems in all three spheres of social, environmental and economic concern. Although the Option could provide a plentiful and long-term supply, this would likely only to be true if there were enabling development elsewhere; it would also create large-scale social stratification.					

	B. Affordable Housing				
	B4a. Provide affordable housing on employment sites as an exception to current policy.			**B4b.** *Do not* provide affordable housing on employment sites as an exception to current policy.	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	S			S		There is concern that possible sites will run out.
	M	+		M	0	
	L			L	-	

	B. Affordable Housing			
	B4a. Provide affordable housing on employment sites as an exception to current policy.		**B4b.** *Do not* provide affordable housing on employment sites as an exception to current policy.	
2. To facilitate the improved health and wellbeing of the whole population, including enabling people to stay independent.	S		S	
	M	+	M	0
	L		L	-
3. To reduce poverty and social exclusion.	S		S	
	M	0	M	0
	L		L	
4. To create and maintain safer and more secure communities.	S		S	
	M	N/A	M	N/A
	L		L	
5. To minimise the harm from flooding.	S		S	
	M	N/A	M	N/A
	L		L	

	B. Affordable Housing				
	B4a. Provide affordable housing on employment sites as an exception to current policy.			**B4b.** *Do not* provide affordable housing on employment sites as an exception to current policy.	
6. To make best use of previously developed land and existing buildings, encouraging sustainable construction.	S		The best use of land in this case could be commercial.	S	
	M	+		M	0
	L			L	
7. To reduce land contamination and safeguard soil quality and quantity.	S		Redevelopment may allow for opportunities for remediation of contaminated land.	S	
	M	+		M	0
	L			L	
8. To ensure air quality continues to improve and noise/light production is reduced.	S			S	
	M	0		M	?
	L			L	
9. To conserve and enhance biodiversity within the plan area.	S			S	
	M	0		M	0
	L			L	
10. To protect, enhance and, where	S			S	

Note: In row 8, the B4b column contains the comment "Continued use of some employment sites creates localised negative impacts."

	B. Affordable Housing				
	B4a. Provide affordable housing on employment sites as an exception to current policy.			**B4b.** *Do not* provide affordable housing on employment sites as an exception to current policy.	
appropriate, make accessible the natural, archaeological and historic environments and cultural assets, for the benefit of both residents and visitors.	M	N/A		M	N/A
	L			L	
11. To reduce road congestion and pollution levels.	S		Changes the nature of the traffic.	S		Continued use of some employment sites creates localised negative impacts.
	M	0		M	?
	L			L	
12. To address the causes of climate change through reducing emissions of greenhouse gases and ensure that the District is prepared for its impacts [could include aviation and road transport].	S			S	
	M	N/A		M	N/A
	L			L	
13. Maintain low rates of unemployment and high levels of economic activity.	S		May reduce overall levels of employment and reduce opportunities for local employment.	S		Employment sites protected.
	M	--		M	+
	L			L	
14. Provide for appropriate	S		May reduce overall levels of employment and	S		Employment sites protected.

	B. Affordable Housing					
	B4a. Provide affordable housing on employment sites as an exception to current policy.			**B4b.** *Do not* provide affordable housing on employment sites as an exception to current policy.		
commercial development opportunities to meet the needs of the economy.	M	--	reduce opportunities for local employment.	M	+	
	L			L		
15. Provide additional commercial development in urban areas [stimulating economic revival in priority regeneration areas].	S		It will limit the opportunities for new commercial development.	S		
	M	-		M	+	
	L			L		
16. Balancing the needs for employment and housing to reduce the need to travel.	S		May reduce the opportunities for local employment.	S		
	M	--		M	+	
	L			L		
17. To reduce the global, social and environmental impact of consumption of resources.	S			S		
	M	0		M	0	
	L			L		
18. To reduce waste generation and disposal, and achieve the sustainable management of waste.	S		Possible loss of waste management use.	S		
	M	?		M	N/A	

	B. Affordable Housing				
	B4a. Provide affordable housing on employment sites as an exception to current policy.			**B4b.** *Do not* provide affordable housing on employment sites as an exception to current policy.	
	L			L	
19. To maintain and improve the water quality of the region's rivers and groundwater, and to encourage the sustainable use of water.	S			S	
	M	N /A		M	N /A
	L			L	
20. To increase energy efficiency.	S			S	
	M	0		M	0
	L			L	
21. To increase the production and use of renewable energy/fuels.	S			S	
	M	0		M	0
	L			L	

	B. Affordable Housing	
	B4a. Provide affordable housing on employment sites as an exception to current policy.	**B4b.** *Do not* provide affordable housing on employment sites as an exception to current policy.

Summary: Option B4a has merits in providing affordable housing on previously developed land, however these sites are limited in number, so will provide only for the short to medium-term. Building more homes on employment land also threatens the ability of the Borough to respond to the future needs of the economy, without putting pressure on the Green Belt. In the absence of a policy that will deliver sufficient quantity of affordable housing however, the longer-term supply will not be met under present circumstances without the release of employment land.

	B. Affordable Housing			
	B5a. Require affordable housing contributions from commercial development.		**B5b.** *Do not* require affordable housing contributions from commercial development.	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	S		S	
	M	+	M	0
	L		L	
2. To facilitate the improved health and wellbeing of the whole population, including enabling	S		S	
	M	+	M	0

	B. Affordable Housing				
	B5a. Require affordable housing contributions from commercial development.			**B5b.** *Do not* require affordable housing contributions from commercial development.	
people to stay independent.	L			L	
3. To reduce poverty and social exclusion.	S			S	
	M	+		M	0
	L			L	
4. To create and maintain safer and more secure communities.	S			S	
	M	+		M	0
	L			L	
5. To minimise the harm from flooding.	S			S	
	M	N/A		M	N/A
	L			L	
6. To make best use of previously developed land and existing buildings, encouraging sustainable	S			S	
	M	N/A		M	N/A

	B. Affordable Housing					
	B5a. Require affordable housing contributions from commercial development.			**B5b.** *Do not* require affordable housing contributions from commercial development.		
construction.	L			L		
7. To reduce land contamination and safeguard soil quality and quantity.	S			S		
	M	N/A		M	N/A	
	L			L		
8. To ensure air quality continues to improve and noise/light production is reduced.	S			S		
	M	N/A		M	N/A	
	L			L		
9. To conserve and enhance biodiversity within the plan area.	S			S		
	M	N/A		M	N/A	
	L			L		
10. To protect, enhance and, where	S			S		

	B. Affordable Housing				
	B5a. Require affordable housing contributions from commercial development.			**B5b.** *Do not* require affordable housing contributions from commercial development.	
appropriate, make accessible the natural, archaeological and historic environments and cultural assets, for the benefit of both residents and visitors.	M	N/A		M	N/A
	L			L	
11. To reduce road congestion and pollution levels.	S			S	
	M	N/A		M	N/A
	L			L	
12. To address the causes of climate change through reducing emissions of greenhouse gases and ensure that the District is prepared for its impacts [could include aviation and road transport].	S			S	
	M	N/A		M	N/A
	L			L	
13. Maintain low rates of unemployment and high levels of economic activity.	S		Could affect commercial viability.	S	
	M	-		M	+
	L			L	
14. Provide for appropriate	S			S	

	B. Affordable Housing			
	B5a. Require affordable housing contributions from commercial development.		**B5b.** *Do not* require affordable housing contributions from commercial development.	
commercial development opportunities to meet the needs of the economy.	M	0	M	0
	L		L	
15. Provide additional commercial development in urban areas [stimulating economic revival in priority regeneration areas].	S		Could affect commercial viability.	S	
	M	-	M	+
	L		L	
16. Balancing the needs for employment and housing to reduce the need to travel.	S		May help to improve the overall balance between employment and housing.	S	
	M	0	M	0
	L		L	
17. To reduce the global, social and environmental impact of consumption of resources.	S		S	
	M	N/A	M	N/A
	L		L	
18. To reduce waste generation and	S		S	

	B. Affordable Housing		
	B5a. Require affordable housing contributions from commercial development.		**B5b.** *Do not* require affordable housing contributions from commercial development.
disposal, and achieve the sustainable management of waste.	M	N/A		M	N/A	
	L			L		
19. To maintain and improve the water quality of the region's rivers and groundwater, and to encourage the sustainable use of water.	S			S		
	M	N/A		M	N/A	
	L			L		
20. To increase energy efficiency.	S			S		
	M	N/A		M	N/A	
	L			L		
21. To increase the production and use of renewable energy/fuels.	S			S		
	M	N/A		M	N/A	
	L			L		

	B. Affordable Housing	
	B5a. Require affordable housing contributions from commercial development.	**B5b.** *Do not* require affordable housing contributions from commercial development.

Summary: Option B5a would clearly help finance affordable housing provision. Although it scores negatively with respect to commercial viability, it could provide some disincentive relative to the continuing oversupply of office space.

	C. Open Spaces and Landscapes				
	C1a. Continue to protect ecological, historical and aesthetically important areas (e.g. Green Belt Areas of Outstanding Natural Beauty), sites and structures.			**C1b.** *Do not* continue to protect ecological, historical and aesthetically important areas (e.g. Green Belt Areas of Outstanding Natural Beauty), sites and structures.	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	S		Protection of greenbelt will restrict housing development if sufficient land is not available within the urban areas.	S		This would allow unrestricted development opportunities.
	M	0		M	+ +	
	L	-		L		
2. To facilitate the improved health	S		Protecting these sites is important for recreation	S		This diminishes open spaces but improves

	C. Open Spaces and Landscapes			
	C1a. Continue to protect ecological, historical and aesthetically important areas (e.g. Green Belt Areas of Outstanding Natural Beauty), sites and structures.		**C1b.** *Do not* continue to protect ecological, historical and aesthetically important areas (e.g. Green Belt Areas of Outstanding Natural Beauty), sites and structures.	
and wellbeing of the whole population, including enabling people to stay independent.	M	++	and health.	M	?	housing choice. Loss of greenbelt, and AONB, may impact on quality of life.
	L			L		
3. To reduce poverty and social exclusion.	S		The greenbelt restricts the building of houses.	S		
	M	-		M	?	
	L			L		
4. To create and maintain safer and more secure communities.	S			S		
	M	N/A		M	N/A	
	L			L		
5. To minimise the harm from flooding.	S		Protecting natural drainage systems and flooding capacity.	S		
	M	+		M	-	
	L			L		

	C. Open Spaces and Landscapes			
	C1a. Continue to protect ecological, historical and aesthetically important areas (e.g. Green Belt Areas of Outstanding Natural Beauty), sites and structures.		**C1b.** *Do not* continue to protect ecological, historical and aesthetically important areas (e.g. Green Belt Areas of Outstanding Natural Beauty), sites and structures.	
6. To make best use of previously developed land and existing buildings, encouraging sustainable construction.	S	Encourages use of existing brownfield sites.	S	
	M +		M --	
	L		L	
7. To reduce land contamination and safeguard soil quality and quantity.	S	Safeguarding agricultural land.	S	
	M +		M --	
	L		L	
8. To ensure air quality continues to improve and noise/light production is reduced.	S		S	
	M 0		M 0	
	L		L	
9. To conserve and enhance biodiversity within the plan area.	S		S	
	M ++		M --	
	L		L	

	C. Open Spaces and Landscapes			
	C1a. Continue to protect ecological, historical and aesthetically important areas (e.g. Green Belt Areas of Outstanding Natural Beauty), sites and structures.		**C1b.** *Do not* continue to protect ecological, historical and aesthetically important areas (e.g. Green Belt Areas of Outstanding Natural Beauty), sites and structures.	
10. To protect, enhance and, where appropriate, make accessible the natural, archaeological and historic environments and cultural assets, for the benefit of both residents and visitors.	S		S	
	M	+ +	M	--
	L		L	
11. To reduce road congestion and pollution levels.	S		S	Allowing development in the greenbelt could increase travel distances.
	M	+	M	-
	L		L	
12. To address the causes of climate change through reducing emissions of greenhouse gases and	S		S	
	M	+	M	-

	C. Open Spaces and Landscapes					
	C1a. Continue to protect ecological, historical and aesthetically important areas (e.g. Green Belt Areas of Outstanding Natural Beauty), sites and structures.			**C1b.** *Do not* continue to protect ecological, historical and aesthetically important areas (e.g. Green Belt Areas of Outstanding Natural Beauty), sites and structures.		
ensure that the District is prepared for its impacts [could include aviation and road transport].	L			L		
13. Maintain low rates of unemployment and high levels of economic activity.	S		Protection of greenbelt could increase pressure to release employment sites; but the retention of natural assets may provide opportunities for tourism and related employment.	S		
	M	?		M	?	
	L			L		
14. Provide for appropriate commercial development opportunities to meet the needs of	S		Not allowing development in the greenbelt may restrict some commercial development and rural	S		
	M	-		M	+	

	C. Open Spaces and Landscapes					
	C1a. Continue to protect ecological, historical and aesthetically important areas (e.g. Green Belt Areas of Outstanding Natural Beauty), sites and structures.			**C1b.** *Do not* continue to protect ecological, historical and aesthetically important areas (e.g. Green Belt Areas of Outstanding Natural Beauty), sites and structures.		
the economy.	L		diversification schemes.	L		
15. Provide additional commercial development in urban areas [stimulating economic revival in priority regeneration areas].	S			S		
	M	N/A		M	N/A	
	L			L		
16. Balancing the needs for employment and housing to reduce the need to travel.	S		Helps to focus mix of development in urban areas.	S		
	M	+		M	-	
	L			L		
17. To reduce the global, social and environmental impact of consumption of resources.	S		Reducing ecological footprint.	S		
	M	+		M	-	
	L			L		
18. To reduce waste generation and	S			S		

			C. Open Spaces and Landscapes			
			C1a. Continue to protect ecological, historical and aesthetically important areas (e.g. Green Belt Areas of Outstanding Natural Beauty), sites and structures.		**C1b.** *Do not* continue to protect ecological, historical and aesthetically important areas (e.g. Green Belt Areas of Outstanding Natural Beauty), sites and structures.	
disposal, and achieve the sustainable management of waste.	M	N/A		M	N/A	
	L			L		
19. To maintain and improve the water quality of the region's rivers and groundwater, and to encourage the sustainable use of water.	S			S		
	M	+		M	-	
	L			L		
20. To increase energy efficiency.	S			S		
	M	N/A		M	N/A	
	L			L		
21. To increase the production and use of renewable energy/fuels.	S		Protection of AONB may restrict development of renewable energy.	S		
	M	--		M	+	
	L			L		

	C. Open Spaces and Landscapes	
	C1a. Continue to protect ecological, historical and aesthetically important areas (e.g. Green Belt Areas of Outstanding Natural Beauty), sites and structures.	**C1b.** *Do not* continue to protect ecological, historical and aesthetically important areas (e.g. Green Belt Areas of Outstanding Natural Beauty), sites and structures.

Summary: Option C1a is overwhelmingly positive in relation to environmental capital. Although protection of the Green Belt can create a constraint on the provision of additional housing, this option, Option B3a, demonstrates the range of negative impacts. The production and use of renewable fuels scored negatively, however it should be noted that PPS22 legitimises appropriate renewable energy development in areas with landscape designations, moreover the additional benefits from some activities e.g. woodland management/ short rotation coppice is likely to be beneficial

	C. Open Spaces and Landscapes				
	C2a. Require high quality design of buildings and public spaces promoting inclusive access, safety and security.			**C2b.** *Do not* require high quality design of buildings and public spaces promoting inclusive access, safety and security.	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	S		High quality design may affect viability.	S	
	M	0		M	0
	L			L	

	C. Open Spaces and Landscapes					
	C2a. Require high quality design of buildings and public spaces promoting inclusive access, safety and security.			**C2b.** *Do not* require high quality design of buildings and public spaces promoting inclusive access, safety and security.		
2. To facilitate the improved health and wellbeing of the whole population, including enabling people to stay independent.	S			S		
	M	+		M	-	
	L			L		
3. To reduce poverty and social exclusion.	S			S		
	M	+		M	-	
	L			L		
4. To create and maintain safer and more secure communities.	S		Opportunity to 'Design out' crime.	S		
	M	+ +		M	-	
	L			L		
5. To minimise the harm from flooding.	S		Designing buildings to withstand flooding. Design to minimise flooding.	S		
	M	+		M	-	
	L			L		

	C. Open Spaces and Landscapes				
	C2a. Require high quality design of buildings and public spaces promoting inclusive access, safety and security.			**C2b.** *Do not* require high quality design of buildings and public spaces promoting inclusive access, safety and security.	
6. To make best use of previously developed land and existing buildings, encouraging sustainable construction.	S		Good design can include sustainable construction and increased densities.	S	
	M	+		M	-
	L			L	
7. To reduce land contamination and safeguard soil quality and quantity.	S			S	
	M	N/A		M	N/A
	L			L	
8. To ensure air quality continues to improve and noise/light production is reduced.	S			S	
	M	+		M	-
	L			L	
9. To conserve and enhance biodiversity within the plan area.	S		Opportunity to incorporate wildlife corridors.	S	
	M	+		M	-
	L			L	

	C. Open Spaces and Landscapes				
	C2a. Require high quality design of buildings and public spaces promoting inclusive access, safety and security.			**C2b.** *Do not* require high quality design of buildings and public spaces promoting inclusive access, safety and security.	
10. To protect, enhance and, where appropriate, make accessible the natural, archaeological and historic environments and cultural assets, for the benefit of both residents and visitors.	S			S	
	M	+		M	-
	L			L	
11. To reduce road congestion and pollution levels.	S		Attention to detail in transport facilities, including access issues, can increase their use.	S	
	M	+		M	-
	L			L	
12. To address the causes of climate change through reducing emissions of greenhouse gases and ensure that the District is prepared for its impacts [could include aviation and road transport].	S			S	
	M	+		M	-
	L			L	
13. Maintain low rates of unemployment and high levels of economic activity.	S			S	
	M	N/A		M	N/A
	L			L	

	C. Open Spaces and Landscapes		
	C2a. Require high quality design of buildings and public spaces promoting inclusive access, safety and security.		**C2b.** *Do not* require high quality design of buildings and public spaces promoting inclusive access, safety and security.
14. Provide for appropriate commercial development opportunities to meet the needs of the economy.	S		S
	M	N/A	M	N/A
	L		L
15. Provide additional commercial development in urban areas [stimulating economic revival in priority regeneration areas].	S		S
	M	N/A	M	N/A
	L		L
16. Balancing the needs for employment and housing to reduce the need to travel.	S		S
	M	N/A	M	N/A
	L		L
17. To reduce the global, social and environmental impact of consumption of resources.	S		S
	M	+	M	-

	C. Open Spaces and Landscapes					
	C2a. Require high quality design of buildings and public spaces promoting inclusive access, safety and security.			**C2b.** *Do not* require high quality design of buildings and public spaces promoting inclusive access, safety and security.		
	L			L		
18. To reduce waste generation and disposal, and achieve the sustainable management of waste.	S			S		
	M	+		M	-	
	L			L		
19. To maintain and improve the water quality of the region's rivers and groundwater, and to encourage the sustainable use of water.	S			S		
	M	+		M	-	
	L			L		
20. To increase energy efficiency.	S			S		
	M	+		M	-	
	L			L		
21. To increase the production and use of renewable energy/fuels.	S		Attention may be needed to seamlessly integrate new technologies into new build.	S		
	M	+		M	-	
	L			L		

	C. Open Spaces and Landscapes	
	C2a. Require high quality design of buildings and public spaces promoting inclusive access, safety and security.	**C2b.** *Do not* require high quality design of buildings and public spaces promoting inclusive access, safety and security.

Summary: Option C2a scored overwhelmingly positive for both environmental and social themes. It was clear however that this could only be achieved by the attention to detail in those areas that address wide-ranging environmental concerns i.e. high quality design does not mean the pursuance of aesthetic quality whilst disregarding the finite nature of our natural resources. This fact will be particularly true relative to the need to incorporate new technology, much of which may well be transient.

	C. Open Spaces and Landscapes				
	C3a. In areas in need of important community facilities and services consider the provision of facilities on urban open spaces surplus to requirements.			**C3b.** *Do not,* in areas in need of important community facilities and services, consider the provision of facilities on urban open spaces surplus to requirements.	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	S			S	
	M	N/A		M	N/A
	L			L	

	C. Open Spaces and Landscapes				
	C3a. In areas in need of important community facilities and services consider the provision of facilities on urban open spaces surplus to requirements.			**C3b. *Do not,*** in areas in need of important community facilities and services, consider the provision of facilities on urban open spaces surplus to requirements.	
2. To facilitate the improved health and wellbeing of the whole population, including enabling people to stay independent.	S			S	
	M	+ +		M	-
	L			L	
3. To reduce poverty and social exclusion.	S			S	
	M	+		M	-
	L			L	
4. To create and maintain safer and more secure communities.	S			S	
	M	N /A		M	N /A
	L			L	
5. To minimise the harm from flooding.	S		Site selection would need to take account of flood risk	S	
	M	-		M	+
	L			L	

	C. Open Spaces and Landscapes					
	C3a. In areas in need of important community facilities and services consider the provision of facilities on urban open spaces surplus to requirements.			**C3b.** *Do not,* in areas in need of important community facilities and services, consider the provision of facilities on urban open spaces surplus to requirements.		
6. To make best use of previously developed land and existing buildings, encouraging sustainable construction.	S		This would neither lead to a better or worse use of PDL	S		
	M	0		M	0	
	L			L		
7. To reduce land contamination and safeguard soil quality and quantity.	S		Risks loss of parkland, allotments etc	S		
	M	-		M	+	
	L			L		
8. To ensure air quality continues to improve and noise/light production is reduced.	S			S		
	M	N/A		M	N/A	
	L			L		
9. To conserve and enhance biodiversity within the plan area.	S		Loss of urban biodiversity	S		
	M	-		M	+	
	L			L		

	C. Open Spaces and Landscapes				
	C3a. In areas in need of important community facilities and services consider the provision of facilities on urban open spaces surplus to requirements.			**C3b.** *Do not,* in areas in need of important community facilities and services, consider the provision of facilities on urban open spaces surplus to requirements.	
10. To protect, enhance and, where appropriate, make accessible the natural, archaeological and historic environments and cultural assets, for the benefit of both residents and visitors.	S		Loss of open space is likely to affect the natural environment, but may create opportunities to improve cultural assets.	S	
	M	?		M	?
	L			L	
11. To reduce road congestion and pollution levels.	S		Depends on the type of facility	S	
	M	?		M	?
	L			L	
12. To address the causes of climate change through reducing emissions of greenhouse gases and ensure that the District is prepared for its impacts [could include aviation and road transport].	S			S	
	M	N /A		M	N /A
	L			L	

	C. Open Spaces and Landscapes		
	C3a. In areas in need of important community facilities and services consider the provision of facilities on urban open spaces surplus to requirements.		**C3b. *Do not,*** in areas in need of important community facilities and services, consider the provision of facilities on urban open spaces surplus to requirements.
13. Maintain low rates of unemployment and high levels of economic activity.	S M N/A L		S M N/A L
14. Provide for appropriate commercial development opportunities to meet the needs of the economy.	S M N/A L		S M N/A L
15. Provide additional commercial development in urban areas [stimulating economic revival in priority regeneration areas].	S M N/A L		S M N/A L
16. Balancing the needs for employment and housing to reduce the need to travel.	S M N/A		S M N/A

	C. Open Spaces and Landscapes					
	C3a. In areas in need of important community facilities and services consider the provision of facilities on urban open spaces surplus to requirements.			**C3b.** *Do not,* in areas in need of important community facilities and services, consider the provision of facilities on urban open spaces surplus to requirements.		
	L			L		
17. To reduce the global, social and environmental impact of consumption of resources.	S		Development will result in a permanent loss of allotment sites and green space	S		
	M	-		M	+	
	L			L		
18. To reduce waste generation and disposal, and achieve the sustainable management of waste.	S			S		
	M	N /A		M	N /A	
	L			L		
19. To maintain and improve the water quality of the region's rivers and groundwater, and to encourage the sustainable use of water.	S		Loss of green space could increase surface run-off	S		
	M	-		M	+	
	L			L		
20. To increase energy efficiency.	S			S		
	M	N /A		M	N /A	

	C. Open Spaces and Landscapes		
	C3a. In areas in need of important community facilities and services consider the provision of facilities on urban open spaces surplus to requirements.		**C3b.** *Do not,* in areas in need of important community facilities and services, consider the provision of facilities on urban open spaces surplus to requirements.
21. To increase the production and use of renewable energy/fuels.	L		L
	S		S
	M	N /A	M	N /A
	L		L

Summary: Option C3a, whilst meeting some aspects of social needs, is otherwise scored negatively. There may even be some question whether the loss of urban land does not have a more significant impact on well being (in terms of access to green space). The phrase "surplus to requirements" needs to be better understood relative to the wider sustainability framework rather than on other criteria, based as they are, at a particular point in time.

	D. Sustainable use of Resources

	D1a. Require more environmentally responsible design and construction practices in the Borough (waste, water, energy, air, adaptation to climate change etc.)			D1b. *Do not* require more environmentally responsible design and construction practices in the Borough (waste, water, energy, air, adaptation to climate change etc.)		
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	S		Benefits of reduced utility costs to residents are clear, but could possibly affect viability	S		
	M	?		M	?	
	L			L		
2. To facilitate the improved health and wellbeing of the whole population, including enabling people to stay independent.	S		Reducing utility costs will help to combat fuel poverty	S		
	M	+		M	-	
	L			L		
3. To reduce poverty and social exclusion.	S		Reducing utility costs will help to combat fuel poverty and help increase the level of disposable income	S		
	M	+		M	-	
	L			L		
4. To create and maintain safer and more secure communities.	S			S		
	M	N/A		M	N/A	
	L			L		
5. To minimise the harm from	S			S		

	D. Sustainable use of Resources				
	D1a. Require more environmentally responsible design and construction practices in the Borough (waste, water, energy, air, adaptation to climate change etc.)			D1b. *Do not* require more environmentally responsible design and construction practices in the Borough (waste, water, energy, air, adaptation to climate change etc.)	
flooding.	M	+ +		M	--
	L			L	
6. To make best use of previously developed land and existing buildings, encouraging sustainable construction.	S			S	
	M	+ +		M	--
	L			L	
7. To reduce land contamination and safeguard soil quality and quantity.	S			S	
	M	+		M	-
	L			L	
8. To ensure air quality continues to improve and noise/light production is reduced.	S			S	
	M	+		M	-
	L			L	

	D. Sustainable use of Resources			
	D1a. Require more environmentally responsible design and construction practices in the Borough (waste, water, energy, air, adaptation to climate change etc.)		D1b. *Do not* require more environmentally responsible design and construction practices in the Borough (waste, water, energy, air, adaptation to climate change etc.)	
9. To conserve and enhance biodiversity within the plan area.	S		S	
	M	+	M	-
	L		L	
10. To protect, enhance and, where appropriate, make accessible the natural, archaeological and historic environments and cultural assets, for the benefit of both residents and visitors.	S		S	
	M	N /A	M	N /A
	L		L	
11. To reduce road congestion and pollution levels.	S		S	
	M	+ +	M	--
	L		L	
12. To address the causes of	S		S	

	D. Sustainable use of Resources			
	D1a. Require more environmentally responsible design and construction practices in the Borough (waste, water, energy, air, adaptation to climate change etc.)		**D1b.** *Do not* require more environmentally responsible design and construction practices in the Borough (waste, water, energy, air, adaptation to climate change etc.)	
climate change through reducing emissions of greenhouse gases and ensure that the District is prepared for its impacts [could include aviation and road transport].	M	++	M	--
	L		L	
13. Maintain low rates of unemployment and high levels of economic activity.	S		S	
	M	N/A	M	N/A
	L		L	
14. Provide for appropriate commercial development opportunities to meet the needs of the economy.	S		S	
	M	N/A	M	N/A
	L		L	
15. Provide additional commercial development in urban areas [stimulating economic revival in priority regeneration areas].	S		S	
	M	N/A	M	N/A

	D. Sustainable use of Resources				
	D1a. Require more environmentally responsible design and construction practices in the Borough (waste, water, energy, air, adaptation to climate change etc.)			**D1b.** *Do not* require more environmentally responsible design and construction practices in the Borough (waste, water, energy, air, adaptation to climate change etc.)	
	L			L	
16. Balancing the needs for employment and housing to reduce the need to travel.	S			S	
	M	N /A		M	N /A
	L			L	
17. To reduce the global, social and environmental impact of consumption of resources.	S			S	
	M	+ +		M	--
	L			L	
18. To reduce waste generation and disposal, and achieve the sustainable management of waste.	S			S	
	M	+ +		M	--
	L			L	
19. To maintain and improve the	S			S	

	D. Sustainable use of Resources				
	D1a. Require more environmentally responsible design and construction practices in the Borough (waste, water, energy, air, adaptation to climate change etc.)			D1b. *Do not* require more environmentally responsible design and construction practices in the Borough (waste, water, energy, air, adaptation to climate change etc.)	
water quality of the region's rivers and groundwater, and to encourage the sustainable use of water.	M	+ +		M	--
	L			L	
20. To increase energy efficiency.	S			S	
	M	+ +		M	--
	L			L	
21. To increase the production and use of renewable energy/fuels.	S			S	
	M	+ +		M	--
	L			L	

D. Sustainable use of Resources	
D1a. Require more environmentally responsible design and construction practices in the Borough (waste, water, energy, air, adaptation to climate change etc.)	D1b. *Do not* require more environmentally responsible design and construction practices in the Borough (waste, water, energy, air, adaptation to climate change etc.)

Summary: Option D1a gains a maximum score in both its ability to protect the environment, reduce the use of finite natural resources, as well as being able to contribute to social well-being through alleviating fuel poverty and reducing the cost of utilities.

	D. Sustainable use of Resources					
	D2a. Require commercial and residential developments to provide a set proportion of their energy requirements by on-site renewable resources.			D2b. *Do not* require commercial and residential developments to provide a set proportion of their energy requirements by on-site renewable resources.		
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	S		Benefits of reduced utility costs to residents/occupiers are clear, but could possibly affect viability	S		
	M	?		M	?	
	L			L		
2. To facilitate the improved health	S		Reducing utility costs will help to combat fuel	S		

	D. Sustainable use of Resources					
	D2a. Require commercial and residential developments to provide a set proportion of their energy requirements by on-site renewable resources.			D2b. *Do not* require commercial and residential developments to provide a set proportion of their energy requirements by on-site renewable resources.		
and wellbeing of the whole population, including enabling people to stay independent.	M	+	costs	M	-	
	L			L		
3. To reduce poverty and social exclusion.	S		For residential properties, reducing utility costs will help to combat fuel poverty and help increase the level of disposable income	S		
	M	+		M	-	
	L			L		
4. To create and maintain safer and more secure communities.	S			S		
	M	N/A		M	N/A	
	L			L		
5. To minimise the harm from flooding.	S			S		
	M	N/A		M	N/A	
	L			L		
6. To make best use of previously	S			S		

	D. Sustainable use of Resources		D2b. **Do not** require commercial and residential developments to provide a set proportion of their energy requirements by on-site renewable resources.	
	D2a. Require commercial and residential developments to provide a set proportion of their energy requirements by on-site renewable resources.			
developed land and existing buildings, encouraging sustainable construction.	M	+	M	-
	L		L	
7. To reduce land contamination and safeguard soil quality and quantity.	S		S	
	M	N/A	M	N/A
	L		L	
8. To ensure air quality continues to improve and noise/light production is reduced.	S		Reduced reliance on fossil fuels	S	
	M	+	M	-
	L		L	
9. To conserve and enhance biodiversity within the plan area.	S		S	
	M	N/A	M	N/A
	L		L	
10. To protect, enhance and, where	S		S	

	D. Sustainable use of Resources					
	D2a. Require commercial and residential developments to provide a set proportion of their energy requirements by on-site renewable resources.			D2b. *Do not* require commercial and residential developments to provide a set proportion of their energy requirements by on-site renewable resources.		
appropriate, make accessible the natural, archaeological and historic environments and cultural assets, for the benefit of both residents and visitors.	M	N /A		M	N /A	
	L			L		
11. To reduce road congestion and pollution levels.	S			S		
	M	N /A		M	N /A	
	L			L		
12. To address the causes of climate change through reducing emissions of greenhouse gases and ensure that the District is prepared for its impacts [could include aviation and road transport].	S			S		
	M	+ +		M	--	
	L			L		
13. Maintain low rates of unemployment and high levels of economic activity.	S			S		
	M	N /A		M	N /A	

	D. Sustainable use of Resources				
	D2a. Require commercial and residential developments to provide a set proportion of their energy requirements by on-site renewable resources.			D2b. *Do not* require commercial and residential developments to provide a set proportion of their energy requirements by on-site renewable resources.	
	L			L	
14. Provide for appropriate commercial development opportunities to meet the needs of the economy.	S		Reduce running costs for commercial development. Opportunities also exist for rural diversification	S	
	M	+		M	-
	L			L	
15. Provide additional commercial development in urban areas [stimulating economic revival in priority regeneration areas].	S			S	
	M	N/A		M	N/A
	L			L	
16. Balancing the needs for employment and housing to reduce the need to travel.	S			S	
	M	N/A		M	N/A
	L			L	
17. To reduce the global, social and	S			S	

	D. Sustainable use of Resources				
	D2a. Require commercial and residential developments to provide a set proportion of their energy requirements by on-site renewable resources.			D2b. *Do not* require commercial and residential developments to provide a set proportion of their energy requirements by on-site renewable resources.	
environmental impact of consumption of resources.	M	+ +		M	--
	L			L	
18. To reduce waste generation and disposal, and achieve the sustainable management of waste.	S		Potential to use organic waste as a fuel	S	
	M	?		M	0
	L	?		L	
19. To maintain and improve the water quality of the region's rivers and groundwater, and to encourage the sustainable use of water.	S			S	
	M	N /A		M	N /A
	L			L	
20. To increase energy efficiency.	S		Helps reduce the transmission losses and risks to supply of centralised generation	S	
	M	+ +		M	--
	L			L	

	D. Sustainable use of Resources		
	D2a. Require commercial and residential developments to provide a set proportion of their energy requirements by on-site renewable resources.		D2b. *Do not* require commercial and residential developments to provide a set proportion of their energy requirements by on-site renewable resources.
21. To increase the production and use of renewable energy/fuels.	S		S
	M	+ +	M	--
	L		L

Summary: Option D2a follows guidance set out in PPS22 that allows Local Authorities to require a percentage of the energy to be used in new residential, commercial or industrial developments to come from on-site renewable energy development. It scores positively relative to its contribution to mitigating the causes of climate change and reducing the whole-life costs of energy, as well as aiding security of energy supply.

D. Sustainable use of Resources

	D3a. Support and encourage the development of renewable energy infrastructure in appropriate locations in the Borough.		D3b. *Do not* support and encourage the development of renewable energy infrastructure in appropriate locations in the Borough.	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	S		S	
	M	N/a	M	N/a
	L		L	
2. To facilitate the improved health and wellbeing of the whole population, including enabling people to stay independent.	S		S	
	M	N/a	M	N/a
	L		L	
3. To reduce poverty and social exclusion.	S		S	
	M	N/A	M	N/A
	L		L	
4. To create and maintain safer and more secure communities.	S		S	
	M	N/A	M	N/A
	L		L	

	D. Sustainable use of Resources					
	D3a. Support and encourage the development of renewable energy infrastructure in appropriate locations in the Borough.			D3b. *Do not* support and encourage the development of renewable energy infrastructure in appropriate locations in the Borough.		
5. To minimise the harm from flooding.	S			S		
	M	N /A		M	N /A	
	L			L		
6. To make best use of previously developed land and existing buildings, encouraging sustainable construction.	S			S		
	M	N /A		M	N /A	
	L			L		
7. To reduce land contamination and safeguard soil quality and quantity.	S			S		
	M	N /A		M	N /A	
	L			L		
8. To ensure air quality continues to improve and noise/light production is	S		Reduced reliance on fossil fuels	S		
	M	+		M	-	

	D. Sustainable use of Resources					
	D3a. Support and encourage the development of renewable energy infrastructure in appropriate locations in the Borough.			D3b. *Do not* support and encourage the development of renewable energy infrastructure in appropriate locations in the Borough.		
reduced.	L			L		
9. To conserve and enhance biodiversity within the plan area.	S		Woodland managing and coppicing could lead to potential benefits through habitat creation.	S		
	M	?		M	?	
	L			L		
10. To protect, enhance and, where appropriate, make accessible the natural, archaeological and historic environments and cultural assets, for the benefit of both residents and visitors.	S			S		
	M	N/A		M	N/A	
	L			L		
11. To reduce road congestion and pollution levels.	S			S		
	M	N/A		M	N/A	
	L			L		
12. To address the causes of	S			S		

	D. Sustainable use of Resources				
	D3a. Support and encourage the development of renewable energy infrastructure in appropriate locations in the Borough.			D3b. *Do not* support and encourage the development of renewable energy infrastructure in appropriate locations in the Borough.	
climate change through reducing emissions of greenhouse gases and ensure that the District is prepared for its impacts [could include aviation and road transport].	M	+ +		M	--
	L			L	
13. Maintain low rates of unemployment and high levels of economic activity.	S			S	
	M	N /A		M	N /A
	L			L	
14. Provide for appropriate commercial development opportunities to meet the needs of the economy.	S		Opportunities exist for rural diversification	S	
	M	+		M	-
	L			L	
15. Provide additional commercial development in urban areas [stimulating economic revival in priority regeneration areas].	S			S	
	M	N /A		M	N /A
	L			L	

	D. Sustainable use of Resources				
	D3a. Support and encourage the development of renewable energy infrastructure in appropriate locations in the Borough.			D3b. *Do not* support and encourage the development of renewable energy infrastructure in appropriate locations in the Borough.	
16. Balancing the needs for employment and housing to reduce the need to travel.	S			S	
	M	N /A		M	N /A
	L			L	
17. To reduce the global, social and environmental impact of consumption of resources.	S			S	
	M	+ +		M	--
	L			L	
18. To reduce waste generation and disposal, and achieve the sustainable management of waste.	S		Potential to use organic waste as a fuel	S	
	M	?		M	0
	L	?		L	
19. To maintain and improve the water quality of the region's rivers and groundwater, and to encourage the sustainable use of water.	S			S	
	M	N /A		M	N /A

	D. Sustainable use of Resources					
	D3a. Support and encourage the development of renewable energy infrastructure in appropriate locations in the Borough.			D3b. *Do not* support and encourage the development of renewable energy infrastructure in appropriate locations in the Borough.		
	L			L		
20. To increase energy efficiency.	S		Helps reduce the transmission losses and risks to supply of centralised generation	S		
	M	+ +		M	--	
	L			L		
21. To increase the production and use of renewable energy/fuels.	S			S		
	M	+ +		M	--	
	L			L		

Summary: Option D3a enables the larger-scale generation of renewable energy and therefore gains a substantial positive score a. The wording of the option needs to be considered in the light of guidance in PPS22 which warns against an area-based policies governing renewable energy generation in favour of criteria based policies

	E. Transport Network					
	E1a. Require developments with potential to generate a lot of traffic to include measures to encourage less car use, for example subsidies for public transport, provision for cycling, car sharing schemes and less car parking.			**E1b.** *Do not* require developments with potential to generate a lot of traffic to include measures to encourage less car use, for example subsidies for public transport, provision for cycling, car sharing schemes and less car parking.		
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	S			S		
	M	N/A		M	N/A	
	L			L		
2. To facilitate the improved health and wellbeing of the whole population, including enabling people to stay independent.	S		Encouragement to move to non-car modes will help to improve health. Subsidies to PT will provide transport for non-car households	S		
	M	++		M	-	
	L			L		
3. To reduce poverty and social	S		Improves affordable travel choice; public transport	S		

	E. Transport Network				
	E1a. Require developments with potential to generate a lot of traffic to include measures to encourage less car use, for example subsidies for public transport, provision for cycling, car sharing schemes and less car parking.			**E1b.** *Do not* require developments with potential to generate a lot of traffic to include measures to encourage less car use, for example subsidies for public transport, provision for cycling, car sharing schemes and less car parking.	
exclusion.	M	+	subsidies should benefit the whole community	M	-
	L			L	
4. To create and maintain safer and more secure communities.	S		Good pedestrian/cycle facilities will increase their attractiveness to users, decreasing the fear/likelihood of crime; road safety will improve	S	
	M	+		M	-
	L			L	
5. To minimise the harm from flooding.	S		Likely to reduce the need for hard-surfacing	S	
	M	+		M	-
	L			L	
6. To make best use of previously developed land and existing buildings, encouraging sustainable	S		Reduced need for car parking increases efficient use of land	S	
	M	+		M	-

	E. Transport Network					
	E1a. Require developments with potential to generate a lot of traffic to include measures to encourage less car use, for example subsidies for public transport, provision for cycling, car sharing schemes and less car parking.			**E1b.** *Do not* require developments with potential to generate a lot of traffic to include measures to encourage less car use, for example subsidies for public transport, provision for cycling, car sharing schemes and less car parking.		
construction.	L			L		
7. To reduce land contamination and safeguard soil quality and quantity.	S			S		
	M	N/A		M	N/A	
	L			L		
8. To ensure air quality continues to improve and noise/light production is reduced.	S			S		
	M	++		M	-	
	L			L		
9. To conserve and enhance	S			S		

	E. Transport Network					
	E1a. Require developments with potential to generate a lot of traffic to include measures to encourage less car use, for example subsidies for public transport, provision for cycling, car sharing schemes and less car parking.			**E1b.** *Do not* require developments with potential to generate a lot of traffic to include measures to encourage less car use, for example subsidies for public transport, provision for cycling, car sharing schemes and less car parking.		
biodiversity within the plan area.	M	N /A		M	N /A	
	L			L		
10. To protect, enhance and, where appropriate, make accessible the natural, archaeological and historic environments and cultural assets, for the benefit of both residents and visitors.	S		Facilitates access to the urban fringe/urban green space and other facilities/services	S		
	M	+		M	-	
	L			L		
11. To reduce road congestion and pollution levels.	S			S		
	M	+ +		M	--	
	L			L		
12. To address the causes of	S			S		

	E. Transport Network					
	E1a. Require developments with potential to generate a lot of traffic to include measures to encourage less car use, for example subsidies for public transport, provision for cycling, car sharing schemes and less car parking.			**E1b.** *Do not* require developments with potential to generate a lot of traffic to include measures to encourage less car use, for example subsidies for public transport, provision for cycling, car sharing schemes and less car parking.		
climate change through reducing emissions of greenhouse gases and ensure that the District is prepared for its impacts [could include aviation and road transport].	M	+ +		M	--	
	L			L		
13. Maintain low rates of unemployment and high levels of economic activity.	S		Some uncertainty over ability to meet increasingly flexible work requirements	S		
	M	?		M	?	
	L			L		
14. Provide for appropriate commercial development opportunities to meet the needs of the economy.	S			S		
	M	N /A		M	N /A	
	L			L		
15. Provide additional commercial development in urban areas [stimulating economic revival in priority regeneration areas].	S			S		
	M	N /A		M	N /A	

	E. Transport Network					
	E1a. Require developments with potential to generate a lot of traffic to include measures to encourage less car use, for example subsidies for public transport, provision for cycling, car sharing schemes and less car parking.			**E1b.** *Do not* require developments with potential to generate a lot of traffic to include measures to encourage less car use, for example subsidies for public transport, provision for cycling, car sharing schemes and less car parking.		
	L			L		
16. Balancing the needs for employment and housing to reduce the need to travel.	S		This SA objective relates more to location of development	S		
	M	0		M	0	
	L			L		
17. To reduce the global, social and environmental impact of consumption of resources.	S		Encourages the use of non-car travel	S		
	M	+		M	-	
	L			L		
18. To reduce waste generation and disposal, and achieve the sustainable management of waste.	S			S		
	M	N/A		M	N/A	
	L			L		
19. To maintain and improve the	S			S		

		E. Transport Network				
		E1a. Require developments with potential to generate a lot of traffic to include measures to encourage less car use, for example subsidies for public transport, provision for cycling, car sharing schemes and less car parking.		**E1b.** *Do not* require developments with potential to generate a lot of traffic to include measures to encourage less car use, for example subsidies for public transport, provision for cycling, car sharing schemes and less car parking.		
water quality of the region's rivers and groundwater, and to encourage the sustainable use of water.	M	N/A		M	N/A	
	L			L		
20. To increase energy efficiency.	S		Assume this Sa objective related to energy in development	S		
	M	N/A		M	N/A	
	L			L		
21. To increase the production and use of renewable energy/fuels.	S			S		
	M	N/A		M	N/A	
	L			L		

E. Transport Network	
E1a. Require developments with potential to generate a lot of traffic to include measures to encourage less car use, for example subsidies for public transport, provision for cycling, car sharing schemes and less car parking.	**E1b.** *Do not* require developments with potential to generate a lot of traffic to include measures to encourage less car use, for example subsidies for public transport, provision for cycling, car sharing schemes and less car parking.

Summary: Option E1a gained a significantly positive score, not only on environmental considerations, but social objectives as well. Support for non-car alternatives means that the need to own one or more cars can be to some extent overcome; a reduced number of cars means that concomitant infrastructure e.g. parking spaces/garages can be reduced, meaning that land can be used more intensively and effectively.

E. Transport Network					
	E2a. Revise parking standards to allow different levels of off-street parking provision depending on an area's accessibility to services by walking, cycling and public transport (whilst ensuring that the average Borough-wide parking provision does not exceed 1.5 parking spaces per dwelling).			**E2b.** *Do not* revise parking standards to allow different levels of off-street parking provision depending on an area's accessibility to services by walking, cycling and public transport (whilst ensuring that the average Borough-wide parking provision does not exceed 1.5 parking spaces per dwelling).	
1. To provide sufficient housing to	S		Reduced parking allows for increased densities,	S	

	E. Transport Network					
	E2a. Revise parking standards to allow different levels of off-street parking provision depending on an area's accessibility to services by walking, cycling and public transport (whilst ensuring that the average Borough-wide parking provision does not exceed 1.5 parking spaces per dwelling).			**E2b. *Do not*** revise parking standards to allow different levels of off-street parking provision depending on an area's accessibility to services by walking, cycling and public transport (whilst ensuring that the average Borough-wide parking provision does not exceed 1.5 parking spaces per dwelling).		
enable people to live in a home suitable to their needs and which they can afford.	M	+	therefore using land more efficiently	M	-	
	L			L		
2. To facilitate the improved health and wellbeing of the whole population, including enabling people to stay independent.	S		This option does not seek to increase alternative travel modes	S		
	M	0		M	0	
	L			L		
3. To reduce poverty and social exclusion.	S			S		
	M	N/A		M	N/A	
	L			L		
4. To create and maintain safer and more secure communities.	S			S		
	M	N/A		M	N/A	

	E. Transport Network					
	E2a. Revise parking standards to allow different levels of off-street parking provision depending on an area's accessibility to services by walking, cycling and public transport (whilst ensuring that the average Borough-wide parking provision does not exceed 1.5 parking spaces per dwelling).			**E2b.** *Do not* revise parking standards to allow different levels of off-street parking provision depending on an area's accessibility to services by walking, cycling and public transport (whilst ensuring that the average Borough-wide parking provision does not exceed 1.5 parking spaces per dwelling).		
	L			L		
5. To minimise the harm from flooding.	S		The quantity of hard surfacing may remain the same.	S		
	M	0		M	0	
	L			L		
6. To make best use of previously developed land and existing buildings, encouraging sustainable construction.	S		Reduced parking allows for increased densities, therefore using land more efficiently	S		
	M	+		M	-	
	L			L		
7. To reduce land contamination and safeguard soil quality and quantity.	S			S		
	M	N/A		M	N/A	
	L			L		
8. To ensure air quality continues to	S		Aggregate number of car miles may not change	S		

	E. Transport Network					
	E2a. Revise parking standards to allow different levels of off-street parking provision depending on an area's accessibility to services by walking, cycling and public transport (whilst ensuring that the average Borough-wide parking provision does not exceed 1.5 parking spaces per dwelling).			**E2b.** *Do not* revise parking standards to allow different levels of off-street parking provision depending on an area's accessibility to services by walking, cycling and public transport (whilst ensuring that the average Borough-wide parking provision does not exceed 1.5 parking spaces per dwelling).		
improve and noise/light production is reduced.	M	0		M	0	
	L			L		
9. To conserve and enhance biodiversity within the plan area.	S			S		
	M	N /A		M	N /A	
	L			L		
10. To protect, enhance and, where appropriate, make accessible the natural, archaeological and historic environments and cultural assets, for the benefit of both residents and visitors.	S		Provides for car use where there is little viable alternative	S		
	M	+		M	-	
	L			L		
11. To reduce road congestion and pollution levels.	S		Aggregate number of car miles may not change	S		
	M	0		M	0	

	E. Transport Network					
	E2a. Revise parking standards to allow different levels of off-street parking provision depending on an area's accessibility to services by walking, cycling and public transport (whilst ensuring that the average Borough-wide parking provision does not exceed 1.5 parking spaces per dwelling).			**E2b.** *Do not* revise parking standards to allow different levels of off-street parking provision depending on an area's accessibility to services by walking, cycling and public transport (whilst ensuring that the average Borough-wide parking provision does not exceed 1.5 parking spaces per dwelling).		
	L			L		
12. To address the causes of climate change through reducing emissions of greenhouse gases and ensure that the District is prepared for its impacts [could include aviation and road transport].	S		Aggregate number of car miles may not change	S		
	M	0		M	0	
	L			L		
13. Maintain low rates of unemployment and high levels of economic activity.	S			S		
	M	N/A		M	N/A	
	L			L		
14. Provide for appropriate commercial development opportunities to meet the needs of the economy.	S			S		
	M	N/A		M	N/A	
	L			L		

		E. Transport Network		
		E2a. Revise parking standards to allow different levels of off-street parking provision depending on an area's accessibility to services by walking, cycling and public transport (whilst ensuring that the average Borough-wide parking provision does not exceed 1.5 parking spaces per dwelling).		**E2b.** *Do not* revise parking standards to allow different levels of off-street parking provision depending on an area's accessibility to services by walking, cycling and public transport (whilst ensuring that the average Borough-wide parking provision does not exceed 1.5 parking spaces per dwelling).
15. Provide additional commercial development in urban areas [stimulating economic revival in priority regeneration areas].	S		S	
	M	N/A	M	N/A
	L		L	
16. Balancing the needs for employment and housing to reduce the need to travel.	S		S	
	M	N/A	M	N/A
	L		L	
17. To reduce the global, social and environmental impact of consumption of resources.	S	Aggregate number of car miles may not change	S	
	M	0	M	0
	L		L	
18. To reduce waste generation and	S		S	

	E. Transport Network				
	E2a. Revise parking standards to allow different levels of off-street parking provision depending on an area's accessibility to services by walking, cycling and public transport (whilst ensuring that the average Borough-wide parking provision does not exceed 1.5 parking spaces per dwelling).			**E2b.** *Do not* revise parking standards to allow different levels of off-street parking provision depending on an area's accessibility to services by walking, cycling and public transport (whilst ensuring that the average Borough-wide parking provision does not exceed 1.5 parking spaces per dwelling).		
disposal, and achieve the sustainable management of waste.	M	N/A		M	N/A	
	L			L		
19. To maintain and improve the water quality of the region's rivers and groundwater, and to encourage the sustainable use of water.	S			S		
	M	N/A		M	N/A	
	L			L		
20. To increase energy efficiency.	S			S		
	M	N/A		M	N/A	
	L			L		
21. To increase the production and	S			S		

	E. Transport Network	
	E2a. Revise parking standards to allow different levels of off-street parking provision depending on an area's accessibility to services by walking, cycling and public transport (whilst ensuring that the average Borough-wide parking provision does not exceed 1.5 parking spaces per dwelling).	**E2b.** *Do not* revise parking standards to allow different levels of off-street parking provision depending on an area's accessibility to services by walking, cycling and public transport (whilst ensuring that the average Borough-wide parking provision does not exceed 1.5 parking spaces per dwelling).
use of renewable energy/fuels.	M / N/A / L	M / N/A / L

Summary: Option E2a scored positively against only three sustainability objectives, which perhaps is unsurprising given that the option could mean significantly different things depending on location (relative to accessibility). This is an option, which in some circumstances could benefit accessibility at an environmental cost; its attraction to some residents could create a vicious circle of more dispersed development and consequently more car-dependence. However this option is developed, it may be seen to be a blunt policy instrument as long as there is no Article 4 direction removing permitted development rights for the creation of hard standing and other parking areas within the cartilage.

	E. Transport Network	
	E3a. Support initiatives to increase the capacity and quality of public transport infrastructure in the Borough.	**E3b.** *Do not* support initiatives to increase the capacity and quality of public transport infrastructure in the Borough.

	E. Transport Network				
	E3a. Support initiatives to increase the capacity and quality of public transport infrastructure in the Borough.			**E3b.** *Do not* support initiatives to increase the capacity and quality of public transport infrastructure in the Borough.	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	S			S	
	M	N/A		M	N/A
	L			L	
2. To facilitate the improved health and wellbeing of the whole population, including enabling people to stay independent.	S			S	
	M	+		M	-
	L			L	
3. To reduce poverty and social exclusion.	S			S	
	M	+ +		M	0
	L			L	
4. To create and maintain safer and more secure communities.	S		Improvements to quality could include provision of CCTV.	S	
	M	+		M	0
	L			L	

	E. Transport Network					
	E3a. Support initiatives to increase the capacity and quality of public transport infrastructure in the Borough.			**E3b.** *Do not* support initiatives to increase the capacity and quality of public transport infrastructure in the Borough.		
5. To minimise the harm from flooding.	S			S		
	M	N /A		M	N /A	
	L			L		
6. To make best use of previously developed land and existing buildings, encouraging sustainable construction.	S			S		
	M	N /A		M	N /A	
	L			L		
7. To reduce land contamination and safeguard soil quality and quantity.	S			S		
	M	N /A		M	N /A	
	L			L		
8. To ensure air quality continues to improve and noise/light production is	S		Better quality public transport helps to reduce car use.	S		
	M	+		M	0	

	E. Transport Network		
	E3a. Support initiatives to increase the capacity and quality of public transport infrastructure in the Borough.		**E3b.** *Do not* support initiatives to increase the capacity and quality of public transport infrastructure in the Borough.
reduced.	L		L	
9. To conserve and enhance biodiversity within the plan area.	S		S	
	M	N/A	M	N/A
	L		L	
10. To protect, enhance and, where appropriate, make accessible the natural, archaeological and historic environments and cultural assets, for the benefit of both residents and visitors.	S		S	
	M	+	M	0
	L		L	
11. To reduce road congestion and pollution levels.	S		S	
	M	++	M	-
	L		L	
12. To address the causes of climate change through reducing emissions of greenhouse gases and	S		S	
	M	+	M	-

	E. Transport Network				
	E3a. Support initiatives to increase the capacity and quality of public transport infrastructure in the Borough.			**E3b.** *Do not* support initiatives to increase the capacity and quality of public transport infrastructure in the Borough.	
ensure that the District is prepared for its impacts [could include aviation and road transport].	L			L	
13. Maintain low rates of unemployment and high levels of economic activity.	S		Improved capacity may help certain sectors of the population reach employment opportunities.	S	
	M	?		M	?
	L			L	
14. Provide for appropriate commercial development opportunities to meet the needs of the economy.	S			S	
	M	N /A		M	N /A
	L			L	
15. Provide additional commercial development in urban areas [stimulating economic revival in priority regeneration areas].	S			S	
	M	N /A		M	N /A
	L			L	
16. Balancing the needs for	S			S	

	E. Transport Network		E3b. *Do not* support initiatives to increase the capacity and quality of public transport infrastructure in the Borough.	
	E3a. Support initiatives to increase the capacity and quality of public transport infrastructure in the Borough.			
employment and housing to reduce the need to travel.	M	N/A	M	N/A
	L		L	
17. To reduce the global, social and environmental impact of consumption of resources.	S		S	
	M	+	M	-
	L		L	
18. To reduce waste generation and disposal, and achieve the sustainable management of waste.	S		S	
	M	N/A	M	N/A
	L		L	
19. To maintain and improve the water quality of the region's rivers and groundwater, and to encourage the sustainable use of water.	S		S	
	M	N/A	M	N/A
	L		L	

	E. Transport Network				
	E3a. Support initiatives to increase the capacity and quality of public transport infrastructure in the Borough.			**E3b.** *Do not* support initiatives to increase the capacity and quality of public transport infrastructure in the Borough.	
20. To increase energy efficiency.	S			S	
	M	N /A		M	N /A
	L			L	
21. To increase the production and use of renewable energy/fuels.	S			S	
	M	N /A		M	N /A
	L			L	

Summary: Option E3a scores positively against both environmental and social objectives. The evidence base relative to this issue is critical to the evaluation of options to reach preferred ways forward: many peak services on existing infrastructure are now sorely stretched. Assumptions about the ability of these services to cope with additional development should not be lightly made. Development focussed on public transport hubs may only be viable with additional support.

	E. Transport Network

	E4a. Improve provision for cyclists and pedestrians in the Borough.			E4b. *Do not* improve provision for cyclists and pedestrians in the Borough.		
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	S			S		
	M	N/A		M	N/A	
	L			L		
2. To facilitate the improved health and wellbeing of the whole population, including enabling people to stay independent.	S		Cycling and walking are part of an everyday healthy lifestyle.	S		
	M	+		M	-	
	L			L		
3. To reduce poverty and social exclusion.	S		Improves access for non-car households.	S		
	M	+		M	-	
	L			L		
4. To create and maintain safer and more secure communities.	S		High quality segregated cycle routes improve road safety for cyclists and improved pedestrian routes also help road safety.	S		
	M	+		M	-	
	L			L		
5. To minimise the harm from	S			S		

	E. Transport Network			
	E4a. Improve provision for cyclists and pedestrians in the Borough.		**E4b.** *Do not* improve provision for cyclists and pedestrians in the Borough.	
flooding.	M	N/A	M	N/A
	L		L	
6. To make best use of previously developed land and existing buildings, encouraging sustainable construction.	S		S	
	M	N/A	M	N/A
	L		L	
7. To reduce land contamination and safeguard soil quality and quantity.	S		S	
	M	N/A	M	N/A
	L		L	
8. To ensure air quality continues to improve and noise/light production is reduced.	S		S	
	M	+	M	0
	L		L	

	E. Transport Network				
	E4a. Improve provision for cyclists and pedestrians in the Borough.			**E4b.** *Do not* improve provision for cyclists and pedestrians in the Borough.	
9. To conserve and enhance biodiversity within the plan area.	S			S	
	M	N /A		M	N /A
	L			L	
10. To protect, enhance and, where appropriate, make accessible the natural, archaeological and historic environments and cultural assets, for the benefit of both residents and visitors.	S		Pedestrian and cycle routes allow improved access to the urban fringe.	S	
	M	+		M	0
	L			L	
11. To reduce road congestion and pollution levels.	S			S	
	M	+		M	-
	L			L	
12. To address the causes of climate change through reducing emissions of greenhouse gases and ensure that the District is prepared for its impacts [could include aviation and road transport].	S		Due to the reduction of car use.	S	
	M	+		M	0
	L			L	
13. Maintain low rates of	S			S	

	E. Transport Network			
	E4a. Improve provision for cyclists and pedestrians in the Borough.		**E4b.** *Do not* improve provision for cyclists and pedestrians in the Borough.	
unemployment and high levels of economic activity.	M	0	M	0
	L		L	
14. Provide for appropriate commercial development opportunities to meet the needs of the economy.	S		S	
	M	N/A	M	N/A
	L		L	
15. Provide additional commercial development in urban areas [stimulating economic revival in priority regeneration areas].	S		S	
	M	N/A	M	N/A
	L		L	
16. Balancing the needs for employment and housing to reduce the need to travel.	S		S	
	M	N/A	M	N/A

	E. Transport Network				
	E4a. Improve provision for cyclists and pedestrians in the Borough.			**E4b.** *Do not* improve provision for cyclists and pedestrians in the Borough.	
	L			L	
17. To reduce the global, social and environmental impact of consumption of resources.	S		Due to the reduction in car use.	S	
	M	+		M	0
	L			L	
18. To reduce waste generation and disposal, and achieve the sustainable management of waste.	S			S	
	M	N /A		M	N /A
	L			L	
19. To maintain and improve the water quality of the region's rivers and groundwater, and to encourage the sustainable use of water.	S			S	
	M	N /A		M	N /A
	L			L	
20. To increase energy efficiency.	S			S	
	M	N /A		M	N /A

	E. Transport Network			
	E4a. Improve provision for cyclists and pedestrians in the Borough.		**E4b.** *Do not* improve provision for cyclists and pedestrians in the Borough.	
	L		L	
21. To increase the production and use of renewable energy/fuels.	S		S	
	M	N/A	M	N/A
	L		L	

Summary: Option E4a scores positively against a range of sustainability objectives, including those relating to social equity and the promotion of healthy lifestyles. Increasingly sedentary lifestyles are a consequence of a modern day, car dominant culture, which is unlikely to change without a significant improvement in pedestrian and cycle infrastructure.

	E. Transport Network			
	E5a. Continue to object to proposals for a second runway at Gatwick.		**E5b.** *Do not* continue to object to proposals for a second runway at Gatwick.	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which	S		S	
	M	N/A	M	N/A

	E. Transport Network					
	E5a. Continue to object to proposals for a second runway at Gatwick.			**E5b.** *Do not* continue to object to proposals for a second runway at Gatwick.		
they can afford.	L			L		
2. To facilitate the improved health and wellbeing of the whole population, including enabling people to stay independent.	S		AQMA existing in Horley is likely to be exacerbated by an extra runway along with an increase in traffic flow.	S		
	M	+		M	-	
	L			L		
3. To reduce poverty and social exclusion.	S			S		
	M	N /A		M	N /A	
	L			L		
4. To create and maintain safer and more secure communities.	S			S		
	M	N /A		M	N /A	
	L			L		
5. To minimise the harm from flooding.	S		Could have adverse impact in the Mole catchment.	S		
	M	?		M	?	

	E. Transport Network		
	E5a. Continue to object to proposals for a second runway at Gatwick.		**E5b.** *Do not* continue to object to proposals for a second runway at Gatwick.
	L		L
6. To make best use of previously developed land and existing buildings, encouraging sustainable construction.	S		S
	M	N/A	M	N/A
	L		L
7. To reduce land contamination and safeguard soil quality and quantity.	S		S
	M	N/A	M	N/A
	L		L
8. To ensure air quality continues to improve and noise/light production is reduced.	S		S
	M	++	M	--
	L		L
9. To conserve and enhance biodiversity within the plan area.	S	Pollution associated with run off could affect biodiversity within the mole catchment.	S
	M	+	M	-

	E. Transport Network					
	E5a. Continue to object to proposals for a second runway at Gatwick.			**E5b.** *Do not* continue to object to proposals for a second runway at Gatwick.		
	L			L		
10. To protect, enhance and, where appropriate, make accessible the natural, archaeological and historic environments and cultural assets, for the benefit of both residents and visitors.	S			S		
	M	N/A		M	N/A	
	L			L		
11. To reduce road congestion and pollution levels.	S			S		
	M	++		M	--	
	L			L		
12. To address the causes of climate change through reducing emissions of greenhouse gases and ensure that the District is prepared for its impacts [could include aviation and road transport].	S			S		
	M	++		M	--	
	L			L		
13. Maintain low rates of unemployment and high levels of economic activity.	S		Limited labour supply may limit the benefits.	S		
	M	-		M	+	

	E. Transport Network					
	E5a. Continue to object to proposals for a second runway at Gatwick.			**E5b.** *Do not* continue to object to proposals for a second runway at Gatwick.		
	L			L		
14. Provide for appropriate commercial development opportunities to meet the needs of the economy.	S		Growth in Gatwick itself may draw away from local economy.	S		
	M	?		M	?	
	L			L		
15. Provide additional commercial development in urban areas [stimulating economic revival in priority regeneration areas].	S		A second runway may lead to associated development around the airport which may affect the viability of Horley Town Centre.	S		
	M	?		M	?	
	L			L		
16. Balancing the needs for employment and housing to reduce the need to travel.	S			S		Horley allocations increase local labour supply.
	M	-		M	+	
	L			L		
17. To reduce the global, social and environmental impact of consumption of resources.	S			S		
	M	+ +		M	--	
	L			L		

	E. Transport Network					
	E5a. Continue to object to proposals for a second runway at Gatwick.			**E5b.** *Do not* continue to object to proposals for a second runway at Gatwick.		
18. To reduce waste generation and disposal, and achieve the sustainable management of waste.	S			S		
	M	N/A		M	N/A	
	L			L		
19. To maintain and improve the water quality of the region's rivers and groundwater, and to encourage the sustainable use of water.	S		Likely to have adverse impact in the Mole catchment.	S		
	M	+		M	-	
	L			L		
20. To increase energy efficiency.	S			S		
	M	N/a		M	N/a	
	L			L		
21. To increase the production and use of renewable energy/fuels.	S			S		
	M	N/a		M	N/a	
	L			L		

	E. Transport Network	
	E5a. Continue to object to proposals for a second runway at Gatwick.	**E5b.** *Do not* continue to object to proposals for a second runway at Gatwick.

Summary: Option E5a scores positively against a variety of sustainability objectives. It should be appreciated that, even with this option, the existing airport will continue to attract an increasing number of passengers annually, which will see a continuation of environmental problems into the foreseeable future e.g. poor air quality in some parts of Horley. Resisting a further runway will encourage more effective use of the facility. The effect of increasing passenger numbers on the rail and road network capacity should not be underestimated in relation to this option.

	F. Economy, regeneration and skills			
	F1a. Relax the Council's current policy on the protection of employment land whilst seeking to retain identified key strategic sites and sites in town centres (accepting that mixed use redevelopment may be acceptable on town centre sites)?		**F1b.** *Do not* relax the Council's current policy on the protection of employment land whilst seeking to retain identified key strategic sites and sites in town centres (accepting that mixed use redevelopment may be acceptable on town centre sites)?	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which	S	Likely to result in release of employment land for housing, including affordable.	S	
	M	+ +	M	0

	F. Economy, regeneration and skills					
	F1a. Relax the Council's current policy on the protection of employment land whilst seeking to retain identified key strategic sites and sites in town centres (accepting that mixed use redevelopment may be acceptable on town centre sites)?			**F1b.** *Do not* relax the Council's current policy on the protection of employment land whilst seeking to retain identified key strategic sites and sites in town centres (accepting that mixed use redevelopment may be acceptable on town centre sites)?		
they can afford.	L			L		
2. To facilitate the improved health and wellbeing of the whole population, including enabling people to stay independent.	S			S		
	M	?		M	?	
	L			L		
3. To reduce poverty and social exclusion.	S		Large site development enables the provision for education, recreation, health, and community services through planning gain.	S		
	M	+		M	0	
	L			L		
4. To create and maintain safer and more secure communities.	S			S		
	M	0		M	0	
	L			L		
5. To minimise the harm from flooding.	S		Opportunity to improve situation on commercial sites prone to flooding.	S		
	M	+		M	-	

	F. Economy, regeneration and skills				
	F1a. Relax the Council's current policy on the protection of employment land whilst seeking to retain identified key strategic sites and sites in town centres (accepting that mixed use redevelopment may be acceptable on town centre sites)?			**F1b.** *Do not* relax the Council's current policy on the protection of employment land whilst seeking to retain identified key strategic sites and sites in town centres (accepting that mixed use redevelopment may be acceptable on town centre sites)?	
	L			L	
6. To make best use of previously developed land and existing buildings, encouraging sustainable construction.	S			S	Could force residential development into Greenfield sites.
	M	+ +		M	-
	L			L	
7. To reduce land contamination and safeguard soil quality and quantity.	S			S	Could force residential development into Greenfield sites.
	M	+		M	-
	L			L	
8. To ensure air quality continues to improve and noise/light production is reduced.	S		Depends on intensity of existing and new uses.	S	
	M	?		M	0
	L			L	
9. To conserve and enhance	S		Currently vacant/derelict sites may have	S	

	F. Economy, regeneration and skills					
	F1a. Relax the Council's current policy on the protection of employment land whilst seeking to retain identified key strategic sites and sites in town centres (accepting that mixed use redevelopment may be acceptable on town centre sites)?			**F1b.** *Do not* relax the Council's current policy on the protection of employment land whilst seeking to retain identified key strategic sites and sites in town centres (accepting that mixed use redevelopment may be acceptable on town centre sites)?		
biodiversity within the plan area.	M	?	ecological value. Could be opportunities to enhance urban biodiversity.	M	0	
	L			L		
10. To protect, enhance and, where appropriate, make accessible the natural, archaeological and historic environments and cultural assets, for the benefit of both residents and visitors.	S			S		
	M	0		M	0	
	L			L		
11. To reduce road congestion and pollution levels.	S		Depends on intensity of existing and new uses.	S		
	M	?		M	0	
	L			L		
12. To address the causes of climate change through reducing emissions of greenhouse gases and ensure that the District is prepared for its impacts [could include aviation and road transport].	S			S		
	M	0		M	0	
	L			L		
13. Maintain low rates of	S	?	Risk to currently occupied sites being brought	S	0	Retains flexibility in the long-term.

	F. Economy, regeneration and skills					
	F1a. Relax the Council's current policy on the protection of employment land whilst seeking to retain identified key strategic sites and sites in town centres (accepting that mixed use redevelopment may be acceptable on town centre sites)?			**F1b.** *Do not* relax the Council's current policy on the protection of employment land whilst seeking to retain identified key strategic sites and sites in town centres (accepting that mixed use redevelopment may be acceptable on town centre sites)?		
unemployment and high levels of economic activity.	M	?	forward by the owner at the expense of the occupier.	M	0	
	L	?		L	+	
14. Provide for appropriate commercial development opportunities to meet the needs of the economy.	S	0		S	0	In the long-term, sites can be redeveloped for new commercial development.
	M	?		M	0	
	L	-		L	+	
15. Provide additional commercial development in urban areas [stimulating economic revival in priority regeneration areas].	S		Loss of sites to residential will not allow additional commercial development to take place.	S		
	M	-		M	+	
	L			L		
16. Balancing the needs for employment and housing to reduce the need to travel.	S		Increases the amount of housing land at the expense of employment land and therefore local jobs.	S		
	M	-		M	+	
	L			L		
17. To reduce the global, social and	S		Use of brownfield land.	S		

	F. Economy, regeneration and skills			
	F1a. Relax the Council's current policy on the protection of employment land whilst seeking to retain identified key strategic sites and sites in town centres (accepting that mixed use redevelopment may be acceptable on town centre sites)?		**F1b.** *Do not* relax the Council's current policy on the protection of employment land whilst seeking to retain identified key strategic sites and sites in town centres (accepting that mixed use redevelopment may be acceptable on town centre sites)?	
environmental impact of consumption of resources.	M	+	M	-
	L		L	
18. To reduce waste generation and disposal, and achieve the sustainable management of waste.	S		S	
	M	N /A	M	N /A
	L		L	
19. To maintain and improve the water quality of the region's rivers and groundwater, and to encourage the sustainable use of water.	S		May provide opportunities to remove polluting industry.	S
	M	?		M	?
	L		L	
20. To increase energy efficiency.	S		Opportunities to replace existing inefficient-build with new regulation build.	S
	M	+	M	0

	F. Economy, regeneration and skills					
	F1a. Relax the Council's current policy on the protection of employment land whilst seeking to retain identified key strategic sites and sites in town centres (accepting that mixed use redevelopment may be acceptable on town centre sites)?			**F1b.** *Do not* relax the Council's current policy on the protection of employment land whilst seeking to retain identified key strategic sites and sites in town centres (accepting that mixed use redevelopment may be acceptable on town centre sites)?		
	L			L		
21. To increase the production and use of renewable energy/fuels.	S			S		
	M	N/A		M	N/A	
	L			L		
Summary: In the present economic climate, Option F1a would bring surplus brownfield land into other uses, therefore protecting greenfield sites from development pressures. There is always some uncertainty about future economic needs, so relaxation always runs the risk of future pressure for greenfield sites. Retaining sites in town centres would help in the promotion of mixed-use development; key strategic sites need to be redefined in the light of newly established priorities e.g. waste, energy, accessibility etc)						

	F. Economy, regeneration and skills

	F2a. Continue the focus of regeneration initiatives in the Borough on larger areas such as Redhill Town Centres and housing estates.			F2b. *Do not* continue the focus of regeneration initiatives in the Borough on larger areas such as Redhill Town Centres and housing estates.	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	S		Current focus is to improve housing standards.	S	
	M	+ +		M	-
	L			L	
2. To facilitate the improved health and wellbeing of the whole population, including enabling people to stay independent.	S			S	
	M	+		M	-
	L			L	
3. To reduce poverty and social exclusion.	S			S	
	M	+ +		M	--
	L			L	
4. To create and maintain safer and more secure communities.	S			S	
	M	+ +		M	--
	L			L	

	F. Economy, regeneration and skills			
	F2a. Continue the focus of regeneration initiatives in the Borough on larger areas such as Redhill Town Centres and housing estates.		**F2b.** *Do not* continue the focus of regeneration initiatives in the Borough on larger areas such as Redhill Town Centres and housing estates.	
5. To minimise the harm from flooding.	S		S	
	M	N /A	M	N /A
	L		L	
6. To make best use of previously developed land and existing buildings, encouraging sustainable construction.	S		S	
	M	+	M	-
	L		L	
7. To reduce land contamination and safeguard soil quality and quantity.	S		S	
	M	0	M	0
	L		L	
8. To ensure air quality continues to improve and noise/light production is reduced.	S		S	
	M	0	M	0
	L		L	

	F. Economy, regeneration and skills					
	F2a. Continue the focus of regeneration initiatives in the Borough on larger areas such as Redhill Town Centres and housing estates.			**F2b.** *Do not* continue the focus of regeneration initiatives in the Borough on larger areas such as Redhill Town Centres and housing estates.		
9. To conserve and enhance biodiversity within the plan area.	S		Opportunities for enhancement.	S		
	M	+		M	0	
	L			L		
10. To protect, enhance and, where appropriate, make accessible the natural, archaeological and historic environments and cultural assets, for the benefit of both residents and visitors.	S		Care needs to be taken to protect existing historic character.	S		
	M	?		M	0	
	L			L		
11. To reduce road congestion and pollution levels.	S			S		
	M	0		M	0	
	L			L		
12. To address the causes of climate change through reducing emissions of greenhouse gases and ensure that the District is prepared for its impacts [could include aviation and road transport].	S		Provide opportunities to mitigate and prepare for impacts of climate change.	S		
	M	+		M	0	
	L			L		
13. Maintain low rates of	S		Creation of more jobs.	S		

	F. Economy, regeneration and skills					
	F2a. Continue the focus of regeneration initiatives in the Borough on larger areas such as Redhill Town Centres and housing estates.			**F2b.** *Do not* continue the focus of regeneration initiatives in the Borough on larger areas such as Redhill Town Centres and housing estates.		
unemployment and high levels of economic activity.	M	+		M	-	
	L			L		
14. Provide for appropriate commercial development opportunities to meet the needs of the economy.	S			S		
	M	+		M	0	
	L			L		
15. Provide additional commercial development in urban areas [stimulating economic revival in priority regeneration areas].	S			S		
	M	+ +		M	--	
	L			L		
16. Balancing the needs for employment and housing to reduce the need to travel.	S			S		
	M	+		M	-	
	L			L		
17. To reduce the global, social and	S			S		

	F. Economy, regeneration and skills				
	F2a. Continue the focus of regeneration initiatives in the Borough on larger areas such as Redhill Town Centres and housing estates.			**F2b.** *Do not* continue the focus of regeneration initiatives in the Borough on larger areas such as Redhill Town Centres and housing estates.	
environmental impact of consumption of resources.	M	?		M	?
	L			L	
18. To reduce waste generation and disposal, and achieve the sustainable management of waste.	S			S	
	M	N/A		M	N/A
	L			L	
19. To maintain and improve the water quality of the region's rivers and groundwater, and to encourage the sustainable use of water.	S			S	
	M	N/A		M	N/A
	L			L	
20. To increase energy efficiency.	S		Redevelopment could offer opportunities to improve energy efficiency/decentralised supplies.	S	
	M	+		M	0
	L			L	
21. To increase the production and	S		Large-scale redevelopment, particularly mixed,	S	

	F. Economy, regeneration and skills				
	F2a. Continue the focus of regeneration initiatives in the Borough on larger areas such as Redhill Town Centres and housing estates.			**F2b.** *Do not* continue the focus of regeneration initiatives in the Borough on larger areas such as Redhill Town Centres and housing estates.	
use of renewable energy/fuels.	M	+	can provide opportunities for renewable energy use.	M	0
	L			L	
Summary: Option F2a scores positively over the whole range of sustainability criteria. Large-scale regeneration is likely to provide more substantial opportunities (e.g. spatial layout; financial resources) to improve the social, economic and environmental fabric					

	F. Economy, regeneration and skills				
	F3a. Broaden the focus of regeneration initiatives to include smaller areas in the Borough that are not reaching their potential.			**F3b.** *Do not* broaden the focus of regeneration initiatives to include smaller areas in the Borough that are not reaching their potential.	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	S			S	
	M	+		M	0
	L			L	
2. To facilitate the improved health	S		Focused on concentrated areas.	S	

	F. Economy, regeneration and skills				
	F3a. Broaden the focus of regeneration initiatives to include smaller areas in the Borough that are not reaching their potential.			**F3b.** *Do not* broaden the focus of regeneration initiatives to include smaller areas in the Borough that are not reaching their potential.	
and wellbeing of the whole population, including enabling people to stay independent.	M	+		M	0
	L			L	
3. To reduce poverty and social exclusion.	S		More concentrated focus on pockets of deprivation may have better effect.	S	
	M	+ +		M	-
	L			L	
4. To create and maintain safer and more secure communities.	S			S	
	M	+		M	-
	L			L	
5. To minimise the harm from flooding.	S			S	
	M	N /A		M	N /A
	L			L	
6. To make best use of previously	S			S	

	F. Economy, regeneration and skills			
	F3a. Broaden the focus of regeneration initiatives to include smaller areas in the Borough that are not reaching their potential.		**F3b.** *Do not* broaden the focus of regeneration initiatives to include smaller areas in the Borough that are not reaching their potential.	
developed land and existing buildings, encouraging sustainable construction.	M	0	M	0
	L		L	
7. To reduce land contamination and safeguard soil quality and quantity.	S		S	
	M	0	M	0
	L		L	
8. To ensure air quality continues to improve and noise/light production is reduced.	S		S	
	M	0	M	0
	L		L	
9. To conserve and enhance biodiversity within the plan area.	S		S	
	M	?	M	0
	L		L	
10. To protect, enhance and, where	S		S	

	F. Economy, regeneration and skills				
	F3a. Broaden the focus of regeneration initiatives to include smaller areas in the Borough that are not reaching their potential.			**F3b.** *Do not* broaden the focus of regeneration initiatives to include smaller areas in the Borough that are not reaching their potential.	
appropriate, make accessible the natural, archaeological and historic environments and cultural assets, for the benefit of both residents and visitors.	M	N /A		M	N /A
	L			L	
11. To reduce road congestion and pollution levels.	S			S	
	M	0		M	0
	L			L	
12. To address the causes of climate change through reducing emissions of greenhouse gases and ensure that the District is prepared for its impacts [could include aviation and road transport].	S			S	
	M	0		M	0
	L			L	
13. Maintain low rates of unemployment and high levels of economic activity.	S			S	
	M	N /A		M	N /A
	L			L	
14. Provide for appropriate	S			S	

	F. Economy, regeneration and skills					
	F3a. Broaden the focus of regeneration initiatives to include smaller areas in the Borough that are not reaching their potential.			**F3b.** *Do not* broaden the focus of regeneration initiatives to include smaller areas in the Borough that are not reaching their potential.		
commercial development opportunities to meet the needs of the economy.	M	N /A		M	N /A	
	L			L		
15. Provide additional commercial development in urban areas [stimulating economic revival in priority regeneration areas].	S		Depends on scale and nature of regeneration.	S		
	M	?		M	0	
	L			L		
16. Balancing the needs for employment and housing to reduce the need to travel.	S			S		
	M	N /A		M	N /A	
	L			L		
17. To reduce the global, social and environmental impact of consumption of resources.	S			S		
	M	?		M	?	
	L			L		
18. To reduce waste generation and	S			S		

	F. Economy, regeneration and skills			
	F3a. Broaden the focus of regeneration initiatives to include smaller areas in the Borough that are not reaching their potential.		**F3b.** *Do not* broaden the focus of regeneration initiatives to include smaller areas in the Borough that are not reaching their potential.	
disposal, and achieve the sustainable management of waste.	M	N /A	M	N /A
	L		L	
19. To maintain and improve the water quality of the region's rivers and groundwater, and to encourage the sustainable use of water.	S		S	
	M	N /A	M	N /A
	L		L	
20. To increase energy efficiency.	S		S	
	M	N /A	M	N /A
	L		L	
21. To increase the production and use of renewable energy/fuels.	S		S	
	M	N /A	M	N /A
	L		L	

F. Economy, regeneration and skills	
F3a. Broaden the focus of regeneration initiatives to include smaller areas in the Borough that are not reaching their potential.	**F3b.** *Do not* broaden the focus of regeneration initiatives to include smaller areas in the Borough that are not reaching their potential.

Summary: The evidence indicates the existence of many pockets of deprivation throughout the Borough, some more than the priority areas. Although regeneration activity in these smaller areas may not meet such wide-ranging benefits as that in larger areas, the improvement in social terms is likely to be significant and would avoid the continuation of extreme disparity.

G. Regenerating Redhill Town Centre		
G1. Adopt a retail led strategy for regenerating and revitalising Redhill Town Centre, requiring a significant expansion of shopping offer in terms of quantity and range, in an effort to compete with Crawley / Croydon and complement Reigate.	**G2.** Adopt a business and employment-focused strategy for regenerating and revitalising Redhill Town Centre that aims to consolidate the employment area and make it more successful and attractive for companies and staff.	**G3.** Adopt a leisure led strategy for regenerating and revitalising Redhill Town Centre, building on the existing theatre and on the medium scale of the centre and its pedestrian qualities.

	G. Regenerating Redhill Town Centre							
	G1. Adopt a retail led strategy for regenerating and revitalising Redhill Town Centre, requiring a significant expansion of shopping offer in terms of quantity and range, in an effort to compete with Crawley / Croydon and complement Reigate.			**G2.** Adopt a business and employment-focused strategy for regenerating and revitalising Redhill Town Centre that aims to consolidate the employment area and make it more successful and attractive for companies and staff.			**G3.** Adopt a leisure led strategy for regenerating and revitalising Redhill Town Centre, building on the existing theatre and on the medium scale of the centre and its pedestrian qualities.		
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	S		Competes with land for housing, however may provide an opportunity to seek a contribution towards affordable housing.	S		Competes with land for housing, however may provide an opportunity to seek a contribution towards affordable housing.	S		Competes with land for housing.
	M	-		M	-		M	-	
	L			L			L		
2. To facilitate the improved health and wellbeing of the whole population, including enabling people to stay independent.	S		Development may allow for the provision of services through planning gain.	S		Development may allow for the provision of services through planning gain.	S		
	M	0		M	0		M	+	
	L			L			L		
3. To reduce poverty and social exclusion.	S		There would be less balance of uses. Local convenience shopping could be squeezed out.	S		May not create jobs appropriate to the needs of the local community.	S		Provide opportunity for those without own transport to access facilities.
	M	-		M	0		M	+	
	L			L			L		

	G. Regenerating Redhill Town Centre								
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4. To create and maintain safer and more secure communities.	S		Retail outlets will close in the evenings thereby exacerbating the lack of activity and natural surveillance.	S		Employment sites will close in the evenings thereby exacerbating the lack of activity and natural surveillance.	S		Will encourage use throughout the day and evening. However this needs to avoid an over predominance of one particular type of leisure facility e.g. public houses.
	M	-		M	-		M	?	
	L			L			L		
5. To minimise the harm from flooding.	S		Opportunities for mitigation of surface runoff.	S		Opportunities for mitigation of surface runoff.	S		Opportunities for mitigation of surface runoff.
	M	0		M	0		M	0	
	L			L			L		
6. To make best use of previously developed land and existing buildings, encouraging sustainable construction.	S			S			S		
	M	+		M	+		M	+	
	L			L			L		
7. To reduce land contamination and	S		In concentrating development	S		In concentrating	S		In concentrating development in

	G. Regenerating Redhill Town Centre								
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safeguard soil quality and quantity.	M	+	in the town centre, spread into Greenfield is lessened. High value development might allow remediation.	M	+	development in the town centre, spread into Greenfield is lessened. High value development might allow remediation.	M	+	the town centre, spread into Greenfield is lessened. High value development might allow remediation.
	L			L			L		
8. To ensure air quality continues to improve and noise/light production is reduced.	S		Retail would increase traffic, thereby reducing air quality.	S		Employment sites would increase peak hour traffic, thereby reducing air quality.	S		Noise and light will need to be mitigated.
	M	-		M	-		M	?	
	L			L			L		
9. To conserve and enhance biodiversity within the plan area.	S		Limited potential to improve biodiversity within the plan area.	S		Limited potential to improve biodiversity within the plan area.	S		Limited potential to improve biodiversity within the plan area.
	M	0		M	0		M	0	
	L			L			L		

	G. Regenerating Redhill Town Centre								
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10. To protect, enhance and, where appropriate, make accessible the natural, archaeological and historic environments and cultural assets, for the benefit of both residents and visitors.	S		Could potentially harm archaeological and cultural assets.	S		Could potentially harm archaeological and cultural assets.	S		Could potentially harm archaeological and cultural assets, however there is potential to enhance.
	M	0		M	0		M	+	
	L			L			L		
11. To reduce road congestion and pollution levels.	S		Retail would increase road congestion, thereby increasing pollution levels.	S		Employment sites would increase road congestion at peak hours, thereby increasing pollution levels.	S		Leisure facilities could increase road congestion, thereby increasing pollution levels.
	M	-		M	-		M	?	
	L			L			L		
12. To address the causes of climate change through reducing emissions of greenhouse gases and	S		Refer to 17.	S		Refer to 17.	S		Refer to 17.
	M	?		M	?		M	?	

	G. Regenerating Redhill Town Centre							
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ensure that the District is prepared for its impacts [could include aviation and road transport].	L			L			L	
13. Maintain low rates of unemployment and high levels of economic activity.	S		Will increase employment, and enhance vitality, viability and attractiveness of the town centre.	S		Will provide employment, however, availability of labour could be an issue.	S	Will increase employment, and enhance vitality, viability and attractiveness of the town centre.
	M	+		M	?		M	+
	L			L			L	
14. Provide for appropriate	S		Provides commercial	S		There is a significant	S	Some leisure facilities are

	G. Regenerating Redhill Town Centre							
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commercial development opportunities to meet the needs of the economy.	M	+	development opportunities.	M	-	oversupply of office space; therefore this would not meet the needs of the local economy.	M	+	commercial e.g. restaurants, fitness centres. This option would provide opportunities for these uses.
	L			L			L		
15. Provide additional commercial development in urban areas [stimulating economic revival in priority regeneration areas].	S		Provides additional commercial development.	S		Provides additional commercial development.	S		Provides additional commercial development.
	M	+ +		M	+ +		M	+	
	L			L			L		
16. Balancing the needs for employment and housing to reduce the need to travel.	S		Will provide retail employment in an accessible location.	S		Will provide employment in an accessible location.	S		
	M	+		M	+		M	0	
	L			L			L		
17. To reduce the global, social and	S		In absolute terms this option	S		In absolute terms this	S		In absolute terms this option will

	G. Regenerating Redhill Town Centre		
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environmental impact of consumption of resources.	M -- L	will require additional energy consumption to build, and to maintain it. Additional retail may encourage additional consumption.	M - L	option will require additional energy consumption to build, and to maintain it.	M - L	require additional energy consumption to build, and to maintain it.
18. To reduce waste generation and disposal, and achieve the sustainable management of waste.	S M 0 L	Recycling facilities should be provided as part of development.	S M 0 L	Recycling facilities should be provided as part of development.	S M 0 L	Recycling facilities should be provided as part of development.
19. To maintain and improve the water quality of the region's rivers and groundwater, and to encourage the sustainable use of water.	S M - L	Landscaping, SuDS, petrol interceptors, etc. should be provided as part of development.	S M - L	Landscaping, SuDS, petrol interceptors, etc. should be provided as part of development.	S M - L	Landscaping, SuDS, petrol interceptors, etc. should be provided as part of development.
20. To increase energy efficiency.	S	If large individual sites then	S	If large individual sites	S	May create energy demand at

	G. Regenerating Redhill Town Centre							
	G1. Adopt a retail led strategy for regenerating and revitalising Redhill Town Centre, requiring a significant expansion of shopping offer in terms of quantity and range, in an effort to compete with Crawley / Croydon and complement Reigate.			**G2.** Adopt a business and employment-focused strategy for regenerating and revitalising Redhill Town Centre that aims to consolidate the employment area and make it more successful and attractive for companies and staff.			**G3.** Adopt a leisure led strategy for regenerating and revitalising Redhill Town Centre, building on the existing theatre and on the medium scale of the centre and its pedestrian qualities.		
	M	+	opportunities for CHP exist.	M	+	then opportunities for CHP exist.	M	+	different times of day.
	L			L			L		
21. To increase the production and use of renewable energy/fuels.	S		If large individual sites then opportunities for renewable energy exist.	S		If large individual sites then opportunities for renewable energy exist.	S		If large individual sites then opportunities for renewable energy exist.
	M	+		M	+		M	+	
	L			L			L		
Summary:								

G. Regenerating Redhill Town Centre

	G4. Adopt a residential led strategy for regenerating and revitalising Redhill Town Centre, aimed at finding a balance between shopping, offices and people living in the centre.		G5. Adopt a strategy for regenerating and revitalising Redhill Town Centre that contains elements of all of the above strategies with a strong focus on leisure and culture.	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	S		S	More likely to facilitate housing.
	M + +		M +	
	L		L	
2. To facilitate the improved health and wellbeing of the whole population, including enabling people to stay independent.	S		S	May provide a better balance of uses, accessible leisure and culture.
	M 0		M +	
	L		L	
3. To reduce poverty and social exclusion.	S	Housing will be nearer to services and facilities.	S	May be opportunities to improve participation of excluded groups in cultural / educational facilities.
	M +		M +	
	L		L	
4. To create and maintain safer and more secure communities.	S	This would introduce natural surveillance and greater amounts of activity, however fear of crime may affect those living in the centre.	S	This would avoid an over predominance of any one use and focus on leisure will continue levels of activity into the evening.
	M +		M + +	
	L		L	

	G. Regenerating Redhill Town Centre					
	G4. Adopt a residential led strategy for regenerating and revitalising Redhill Town Centre, aimed at finding a balance between shopping, offices and people living in the centre.			**G5.** Adopt a strategy for regenerating and revitalising Redhill Town Centre that contains elements of all of the above strategies with a strong focus on leisure and culture.		
5. To minimise the harm from flooding.	S		Opportunities for mitigation of surface runoff.	S		Opportunities for mitigation of surface runoff.
	M	0		M	0	
	L			L		
6. To make best use of previously developed land and existing buildings, encouraging sustainable construction.	S			S		This would maximise use of land, for example mixed use development with residential above other uses.
	M	+		M	+ +	
	L			L		
7. To reduce land contamination and safeguard soil quality and quantity.	S		In concentrating development in the town centre, spread into Greenfield is lessened. High value development might allow remediation.	S		In concentrating development in the town centre, spread into Greenfield is lessened. High value development might allow remediation.
	M	+		M	+	
	L			L		
8. To ensure air quality continues to improve and noise/light production is reduced.	S		Would reduce need for travel, thereby improving air quality.	S		Would reduce need for travel, thereby improving air quality. Noise and light will need to be mitigated.
	M	+		M	0	
	L			L		

	G. Regenerating Redhill Town Centre				
	G4. Adopt a residential led strategy for regenerating and revitalising Redhill Town Centre, aimed at finding a balance between shopping, offices and people living in the centre.			**G5.** Adopt a strategy for regenerating and revitalising Redhill Town Centre that contains elements of all of the above strategies with a strong focus on leisure and culture.	
9. To conserve and enhance biodiversity within the plan area.	S		Limited potential to improve biodiversity within the plan area.	S		Limited potential to improve biodiversity within the plan area.
	M	0		M	0	
	L			L		
10. To protect, enhance and, where appropriate, make accessible the natural, archaeological and historic environments and cultural assets, for the benefit of both residents and visitors.	S		Could potentially harm archaeological and cultural assets.	S		Potential to enhance cultural assets.
	M	0		M	+	
	L			L		
11. To reduce road congestion and pollution levels.	S		Would reduce need for travel, thereby reducing road congestion.	S		Would reduce need for travel, thereby reducing road congestion.
	M	+		M	+	
	L			L		
12. To address the causes of climate change through reducing emissions of greenhouse gases and ensure that the District is prepared for its impacts [could include aviation and road transport].	S		Refer to 17. A better mix of uses will enable viability during extreme environmental events i.e. flooding, heat waves.	S		Refer to 17. A better mix of uses will enable viability during extreme environmental events i.e. flooding, heat waves.
	M	+		M	+	
	L			L		

	G. Regenerating Redhill Town Centre				
	G4. Adopt a residential led strategy for regenerating and revitalising Redhill Town Centre, aimed at finding a balance between shopping, offices and people living in the centre.			**G5.** Adopt a strategy for regenerating and revitalising Redhill Town Centre that contains elements of all of the above strategies with a strong focus on leisure and culture.	
13. Maintain low rates of unemployment and high levels of economic activity.	S		Could possibly increase the supply of labour.	S		Provision of a wide range of employment opportunities and possible labour supply.
	M	0		M	+ +	
	L			L		
14. Provide for appropriate commercial development opportunities to meet the needs of the economy.	S		Supply of labour meets the needs of maintaining existing commerce.	S		Providing a range of opportunities for commercial development.
	M	+		M	+	
	L			L		
15. Provide additional commercial development in urban areas [stimulating economic revival in priority regeneration areas].	S		Residential may compete with additional commercial development.	S		Provides additional commercial development.
	M	0		M	+	
	L			L		
16. Balancing the needs for	S		Will provide some employment and reduce the	S		Greater range of employment opportunities

	G. Regenerating Redhill Town Centre					
	G4. Adopt a residential led strategy for regenerating and revitalising Redhill Town Centre, aimed at finding a balance between shopping, offices and people living in the centre.			**G5.** Adopt a strategy for regenerating and revitalising Redhill Town Centre that contains elements of all of the above strategies with a strong focus on leisure and culture.		
employment and housing to reduce the need to travel.	M	+ +	need to travel.	M	+	likely to reduce the need to travel.
	L			L		
17. To reduce the global, social and environmental impact of consumption of resources.	S		This option requires less overall development. Housing need must be met regardless of location.	S		In absolute terms this option will require additional energy consumption to build, and to maintain it, but to a lesser extent than options 1,2 and 3.
	M	0		M	-	
	L			L		
18. To reduce waste generation and disposal, and achieve the sustainable management of waste.	S		Recycling facilities should be provided as part of development.	S		Recycling facilities should be provided as part of development.
	M	0		M	0	
	L			L		
19. To maintain and improve the water quality of the region's rivers and groundwater, and to encourage	S		Landscaping, SuDS, petrol interceptors, etc. should be provided as part of development.	S		Landscaping, SuDS, petrol interceptors, etc. should be provided as part of development.
	M	-		M	-	

	G. Regenerating Redhill Town Centre				
	G4. Adopt a residential led strategy for regenerating and revitalising Redhill Town Centre, aimed at finding a balance between shopping, offices and people living in the centre.			**G5.** Adopt a strategy for regenerating and revitalising Redhill Town Centre that contains elements of all of the above strategies with a strong focus on leisure and culture.	
the sustainable use of water.	L			L		
20. To increase energy efficiency.	S		Large scale concentrated development offers opportunities for decentralised energy production and CHP.	S		Large scale concentrated mixed development offers opportunities for decentralised energy production and CHP. This provides opportunity for 24hour energy use.
	M	+		M	+ +	
	L			L		
21. To increase the production and use of renewable energy/fuels.	S		If large individual sites then opportunities for renewable energy exist.	S		A mixed development will improve the financial viability of a district heating scheme employing biomass.
	M	+		M	+ +	
	L			L		

G. Regenerating Redhill Town Centre	
G4. Adopt a residential led strategy for regenerating and revitalising Redhill Town Centre, aimed at finding a balance between shopping, offices and people living in the centre.	**G5.** Adopt a strategy for regenerating and revitalising Redhill Town Centre that contains elements of all of the above strategies with a strong focus on leisure and culture.

Summary: The first three options, because of the strong focus on one type of activity, have been assessed as having a detrimental affect on balanced activity within the town centre, with consequential risks on vibrancy/fear of crime. These options, because of their larger-scale activity would also tend to generate traffic from other regions. Options G4 and G5 scored similarly on environmental criteria, however wider social benefits accrued to Option G5: balanced mixed-use strategy with a strong focus on culture and leisure was assessed as more likely to meet the wider needs of the local population.

The Preferred Options SA report was published in May 2006.

When the Sustainability Appraisal was carried out:
The SA of the Core Strategy Preferred Options was carried out on 2 May 2006.

Who carried out the Sustainability Appraisal?
The Sustainability Appraisal was carried out by:

- o Paul Newdick – Tandridge District Council
- o Susie Peck – Epsom & Ewell Borough Council
- o Tom Jones – Independent Consultant
- o Raymond Dill – Reigate & Banstead Borough Council
- o Caroline Keogh – Reigate & Banstead Borough Council

List of Policy Options for Sustainability Appraisal

Topic: Overall Vision

To ensure that development makes efficient use of land and existing infrastructure in the Borough, minimising the use of non-renewable resources, avoiding adverse impacts on the environment and maximising the quality of life for everyone in the Borough.

Topic: Housing

2. Policy Objective text: To enable required housing growth to be accommodated within existing built up areas, in sustainable locations which have the necessary infrastructure, services and community provision, or where this provision is planned, while also catering for local housing needs.

Preferred Policy Options
It is proposed that the Core Strategy seeks to make provision for the development of 7740 new dwellings in the Borough over the period 2006 to 2026.

It is proposed that the Core Strategy identify a settlement hierarchy for use in determining the scale of development appropriate in different locations.

It is proposed that overall supply of new residential development be subject to a 'plan, monitor and manage' approach that keeps the supply of housing land under review.

It is proposed that the Core Strategy include a policy setting out an intention to phase the rate at which large sites come forward for development in order to ensure that development does not outstrip the capacity of local infrastructure and services.

3. Policy Objective text: To ensure that the design and scale of new development recognises and protects the character of our town centres and other urban areas.

Preferred Policy Options

It is proposed that the Core Strategy identify a settlement hierarchy for use in determining the scale of development appropriate in different locations.

4. Policy Objective text: To ensure that the type of dwellings built is suited to the requirements of the local population, and that an appropriate proportion is 'affordable' to those in need.

Preferred Policy Options

It is proposed that the Core Strategy secures a mix of dwelling, size and type that reflects the Council's housing and market needs assessment study.

It is proposed that the Core Strategy includes an affordable housing policy that requires:

- All new housing developments comprising 15 dwellings or more to provide at least 35% of housing as affordable, subject to site viability;
- For housing developments that fall below the threshold size, require a payment towards affordable housing so that it can be provided elsewhere in the Borough.

It is proposed that the Core Strategy set out an appropriate mix of affordable housing to be provided as social rented, affordable home ownership and /or intermediate rented accommodation.

5. Policy Objective text: To enable the housing needs of particular groups to be met in appropriate locations.

Preferred Policy Options

It is proposed that the Core Strategy includes an affordable housing policy that requires:

- All new housing developments comprising 15 dwellings or more to provide at least 35% of housing as affordable, subject to site viability;
- For housing developments that fall below the threshold size, require a payment towards affordable housing so that it can be provided elsewhere in the Borough.

It is proposed that the Core Strategy set out an appropriate mix of affordable housing to be provided as social rented, affordable home ownership and /or intermediate rented accommodation.

It is proposed that the Core Strategy include policies that address those groups with special housing needs and in particular sets out criteria for considering proposals for gypsy site provision taking into account the Gypsy and Travellers sites joint study.

Topic: Community Services and Infrastructure

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6. Policy Objective text: To seek to secure adequate land, community services and infrastructure to support business and community needs.

Preferred Policy Options

It is proposed that the Core Strategy include policies to protect existing community and leisure facilities where a need exists and encourage opportunities for joint provision and sharing of premises.

It is proposed that the Core Strategy includes a commitment to work, preferably jointly with infrastructure and service providers and developers, to identify the needs and establish a programme for the provision of infrastructure within the borough that takes into account the cumulative impact of small-scale development.

It is proposed in this context that the Core Strategy contains policies that secure from new development contributions towards infrastructure required to meet the needs created by new development.

7. Policy Objective text: To increase opportunities for pursuing a healthy lifestyle, by maintaining and enhancing recreation opportunities and encouraging walking and cycling.

Preferred Policy Options

It is proposed that the Core Strategy include policies to protect existing community and leisure facilities where a need exists and encourage opportunities for joint provision and sharing of premises.

It is proposed that the Core Strategy includes a commitment to review and seek to improve where necessary the quality and accessibility of our parks and play facilities.

8. Policy Objective text: To maintain and enhance Reigate & Banstead's valued landscapes, habitats and species

Preferred Policy Options

It is proposed that the Core Strategy includes policies that recognise the Borough's valued natural and urban environments and ensures their continued protection and enhancement.

It is proposed that the Core Strategy includes policies to ensure that development proposals demonstrate a high quality of design in terms of their layout, form and contribution to the character of the area.

9. Policy Objective text: To conserve and enhance the special character and separate identities of Reigate and Banstead's towns and other urban areas.

Preferred Policy Options

It is proposed that the Core Strategy includes policies that recognise the Borough's valued natural and urban environments and ensures their continued protection and enhancement.

It is proposed that the Core Strategy includes policies to ensure that development proposals demonstrate a high quality of design in terms of their layout, form and contribution to the character of the area.

10. Policy Objective text: To ensure that the design of new development makes best use of the site, integrates effectively with its setting, promotes local distinctiveness, maximises accessibility and minimises the fear of crime.

Preferred Policy Options

It is proposed that the Core Strategy includes policies to ensure that development proposals demonstrate a high quality of design in terms of their layout, form and contribution to the character of the area.

It is proposed that the Core Strategy includes policies requiring more environmentally responsible design and construction practices in the borough (waste, water, energy, air, adaptation to climate change etc.) including a requirement to provide for a proportion of the developments energy needs using on-site renewable energy generation.

11. Policy Objective text: To require that developments conserve natural resources, minimise greenhouse gas emissions and help to reduce waste and are adaptable to climate change (including the risk from flooding).

Preferred Policy Options

It is proposed that the Core Strategy includes policies requiring more environmentally responsible design and construction practices in the borough (waste, water, energy, air, adaptation to climate change etc.) including a requirement to provide for a proportion of the developments energy needs using on-site renewable energy generation.

Topic: Transport

12. Policy Objective text: To secure a safe and efficient transport system, making best use of existing infrastructure, developing new infrastructure and encouraging alternatives to private car use including cycling and walking.

Preferred Policy Options

It is proposed that the Core Strategy includes policies that ensure development proposals:

- Are capable of being served by safe and convenient access to the highway network and public transport;
- Do not give rise to traffic volumes that exceed the capacity of the local or strategic highway network;
- Do not cause harm to the character of the surrounding area as a result of the amount or type of traffic or additional parking generated;
- Be accompanied by a transport assessment, or transport statement depending on upon the size of the scheme and its potential impact;
- For any non-residential schemes that could have significant implications for movement, in areas where air quality is poor or where traffic congestion is a recognised problem, to be accompanied by a travel plan;
- Require realistic parking provision in the context of accessibility; and
- Provide high quality pedestrian / cycle infrastructure.

To seek to encourage significant improvements to the arrangements for interchange between bus and rail particularly in the quality of facilities, integration and frequency of services, upgrading infrastructure where necessary, and linking public transport improvements to town centre parking strategies.

Topic: Local Economy, Regeneration and Skills

13. Policy Objective text: To strengthen the vitality and viability of the Borough's town, village and local shopping centres.

Preferred Policy Options
- ➢ It is proposed that the Core Strategy includes policies that reinforce the multi-purpose role of town centres and local shopping areas by retaining and increasing provision of retail, social, community and leisure uses.

14. Policy Objective text: To ensure the right amount, range, size and type of commercial areas are available and that the necessary infrastructure and facilities are provided to support a level of economic growth compatible with protecting and enhancement of our environment.

Preferred Policy Options
- ➢ It is proposed that the Core Strategy includes policies that provide for the more efficient re-use of existing employment land, subject to the results of an employment land review.

- ➢ It is proposed that Core Strategy polices include a commitment to work with parties, such as SEEDA, SEP and Surrey University to identify employment needs and facilitate the provision of appropriate accommodation such as starter units.

15. Policy Objective text: To work in partnership with service providers and other relevant stakeholders to realise opportunities to enhance the quality of life for residents in locations in the borough where there is potential to improvement.

Preferred Policy Options
- ➢ It is proposed that the Council produce Area Action Plans and Supplementary Planning Documents for areas that meet some or all of the following criteria:
  - The area is subject to development pressure and rapid change;
  - The area suffers for poor environment quality;
  - The area contains communities with problems arising from social inequality.

Commentary for results matrix. The comment number corresponds to the numbers within the matrix.

1. Policies need to be in place to design out crime. This should be supplemented by policy that ensures delivering of principles of designing out crime.
2. New development will not necessarily minimise harm from flooding. Needs to be supplemented by policy that refers to means of minimising the harm from flooding. (see PO 11)
3. Benefit is coincidental – objective is to deliver the housing
4. Safeguarding soil q&q, coincidental benefit.
5. Building houses per se will have negative affect. Policy is aiming to provide housing in sustainable location, thereby improving air quality. Sustainable location needs to be defined. Assumption is that people living in transport hubs will travel less, this will be dependent on other measures e.g. reducing parking standards. Pushing people into small area will have negative affect, dependent on speed of new technology in reducing emissions.
6. Concentrated into smaller area, but over borough as a whole. Higher density noise and light but no significant increase.
7. More housing wont help in itself, but positive if 'necessary infrastructure' includes means to reduce point source pollution e.g. SuDS
8. May destroy some biodiversity, however, opportunity to create new habitats. Need for policy that proactively looks at biodiversity for urban environment.
9. Risk to historic environment through intensification, needs policy for proactive protection (objective 9 & others). Need for definition, what is cultural valuable?
10. Risk of increasing density without minimising parking standards. If access to public transport/safe walking/cycling is ensured then positive. Reference to topic 5 – transport – provides policy options for this objective.
11. Reducing the need to travel (refer to topic 5 for policy options). Fuel use lower and access to public transport score positively.
12. Mitigation – reference should be made to sustainable construction when policy is written in detail. Policy option is negative because of pushing people together, worse for dealing with temperature increase (no shade, temperature islands). Need for reference to cooling systems at later stage of detail.
13. Risk of reducing employment opportunities – need for policy to protect sufficient employment land (see policy objective 6)
14. Provision of housing will not help deliver land for employment, opportunities in town centres for mixed development.
15. Increased economic activity in town centres due to new development, increase in viability. Provision of live-work units could be referred to in policy detail.
16. Focusing in urban areas makes best use of land resources. Mitigation – ZED, one planet living.
17. Opportunity through new build, not as much with existing.
18. More concentrated development gives scope for greater schemes. Sites need to be allocated for delivery.
19. High quality design and environment aides well-being.
20. Instead of only protecting existing character, also enhance. Excluded estates should have character enhanced, landscape improvement. Policy option should have reference to this/ needs to be changed.

21. Enhancement of environment will create safer-feeling communities, better looked after by residents. (refer to PO 10)
22. Appropriate location is planned for. Detail of where will be at later stage.
23. e.g. putting elderly in accessible location. (refer to Incl. Access SPD)
24. Good design will seek to minimise light pollution.
25. Biodiversity can be designed into developments.
26. Instead of only protecting existing character, also enhance. Excluded estates should have character enhanced, landscape improvement. Policy option should have reference to this/ needs to be changed.
27. The type of dwelling that is required could mean a difference in design.
28. Good design should seek to avoid additional congestion. (Policy on design)
29. Objective allows key workers living near to places of work.
30. Inhibiting objective in terms of scale and design e.g. distinctive rooflines/flues.
31. Provision of affordable housing could limit the opportunity to reduce greenhouse gases (because of additional costs of affordable housing). This will reduce in the longer term.
32. Could have affect on design/character. Design guidance required.
33. Policies regarding future-proofing need to be developed.
34. Provision of key worker housing underpinning economic growth.
35. Link to PO 11
36. The aim of protecting character could conflict with the objective of delivering renewable energy.
37. Drainage infrastructure
38. Seeks to secure adequate lands to deliver comprehensive and coherent plan.
39. Will reduce travel.
40. Walking/cycling will reduce noise from traffic.
41. Water infrastructure – sewer improvements, SuDS, etc.
42. Potential conflict between delivery of new community infrastructure within the constraints of the existing built and natural environment.
43. Junction improvements etc could improve traffic flow. Meeting community needs will reduce need for travel.
44. Reduction in congestion will aid business.
45. Walking/cycling is part of a sustainable lifestyle.
46. Positive when associated with delivery of district heating.
47. Housing needs can be met without the need to develop on protected sites and landscapes.
48. Mitigation through PO 3
49. Positive if best use of site is for housing.
50. Likely to reduce the running costs of homes.
51. Opportunity to enjoy landscapes etc
52. Maintaining human health by reducing risks from extremes of temperature.
53. Issues regarding accessibility and historic built environment/character need to be addressed.
54. Retention of existing buildings will save resources, but may not offer opportunities to reduce greenhouse gas emissions.
55. Safeguarding soil.
56. Maintaining landscapes will avoid development in certain areas thereby restricting light pollution.
57. Design should include sensitive use of light.

58. Conflict between lighting streets and footpaths and light pollution. Maybe internal conflict within the objective – safe lighting on footpaths and 'integrating effectively within its setting'.
59. In conserving resources light levels may be reduced.
60. Maintaining landscapes will maintain water…
61. Potential use of grey water will reduce need for sewerage, pollution by phosphate/nitrate.
62. This needs to include enhancement of biodiversity.
63. Need to ensure biodiversity interests are able to adapt i.e. Through migration channels.
64. 63+ need to focus on means to protect the historic/cultural sites from climate change.
65. Would be positive if supplemented by a policy reducing traffic congestion.
66. Risk of conflict between local distinctiveness/character and new technology/mechanisms for passive control of heat etc.
67. May offer opportunities for better management of boroughs woodlands and other natural habitats.
68. Supports the concept of smart growth.
69. Better management of existing woodlands can produce wood fuel.
70. Safer communities include safe public transport and road safety.
71. Slight positive impact due to reduction in traffic noise.
72. Light is part of a safe transport system e.g. cycle paths, design issue.
73. Risk of impact on assets.
74. Transport is important component of greenhouse gas emissions.
75. Safe and efficient means to ensure infrastructure is climate change proofed.
76. Adequate infrastructure facilitates the development of land for employment.
77. Supports smarter ways of working.
78. Positive due to making best use of existing infrastructure and promoting low carbon transport.
79. Potential conflict between the use of land for business and land available for housing. Policy should be more defined relative to right amount, range, size etc.
80. Economic growth = employment opportunities = health and wellbeing.
81. Economic growth = employment opportunities = prosperity.
82. Vital town centre may increase surveillance and therefore security.
83. Uncertain of issues as they have not be specified.
84. Aiming to support mixed development, whilst taking on concerns of environment. Density will reflect accessibility.
85. Supports the remediation and protection of Green Belt.
86. In increasing numbers of people using the town centres, car use may be increased. Policy options should be directed at reducing private car use.
87. Strengthening vitality and viability may support retention of historic and cultural assets.
88. Enhancement in the quality of life in deprived areas could include enhancement of the built/natural environment.
89. Effects on travel unpredictable.
90. Necessary infrastructure will be provided in order to protect the environment.
91. Will provide local shops for local people.
92. Provide employment opportunities.
93. Limited opportunities for economic growth within villages and town centres.
94. Requires more detail to show how sustainable productions objectives are going to be met.

Core Strategy – Preferred Options	Objective 1 Overall Vision	Objective 2 Housing	Objective 3 Housing	Objective 4 Housing	Objective 5 Housing	Objective 6 Community Services and Infrastructure	Objective 7 Community Services and Infrastructure	Objective 8 Environment	Objective 9 Environment	Objective 10 Environment	Objective 11 Environment	Objective 12 Transport	Objective 13 Local Economy, regeneration and skills	Objective 14 Local Economy, regeneration and skills	Objective 15 Local Economy, regeneration and skills
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.		++	N/A	++	++	N/A	N/A	0 47	0 48	+ 49	+ 50	N/A	N/A	? 79	N/A
2. To facilitate the improved health and wellbeing of the whole population.		++	+ 19	++	++	++	++	+ 51	N/A	++	+ 52	++	++	+ 80	++
3. To reduce poverty and social exclusion.		++	- 20	++	++	++	++	N/A	N/A	++	N/A	++	++	+ 81	++
4. To create and maintain safer and more secure communities.		+ 1	+ 21	0	+ 22	++	++	N/A	N/A	++	N/A	+ 70	+ 82	N/A	++
5. To minimise the harm from flooding.		? 2	N/A	N/A	N/A	+ 37	N/A	N/A	N/A	N/A	++	N/A	N/A	N/A	? 83
6. To improve accessibility to all services and facilities.		++	N/A	N/A	+ 23	++	++	N/A	? 53	++	N/A	++	++	++	++
7. To make the best use of previously developed land and existing buildings.		+ 3	0	0	0	+ 38	N/A	N/A	N/A	++	? 54	N/A	0	+ 84	? 83
8. To reduce land contamination and safeguard soil quality and quantity.		+ 4	N/A	N/A	N/A	0	N/A	+ 55	N/A	N/A	N/A	N/A	N/A	+ 85	N/A
9. To ensure air quality continues to improve.		? 5	N/A	N/A	N/A	+ 39	++	N/A	N/A	N/A	++	++	? 86	+ 86	N/A
10. To reduce noise pollution.		? 6	N/A	N/A	N/A	N/A	+ 40	N/A	N/A	N/A	N/A	+ 71	? 86	+ 86	N/A
11. To reduce light pollution.		? 6	+ 24	N/A	N/A	N/A	N/A	+ 56	+ 57	- 58	? 59	? 72	N/A	N/A	N/A
12. To maintain and improve the water quality of the region's rivers and groundwater		+ 7	N/A	N/A	N/A	+ 41	N/A	+ 60	N/A	N/A	+ 61	N/A	N/A	N/A	N/A
13. To conserve and enhance biodiversity within the plan area.		- 8	+ 25	N/A	N/A	N/A	N/A	++	? 62	N/A	+ 63	N/A	N/A	N/A	N/A
14. To protect and enhance the natural, archaeological, historic environments and cultural assets.		- 9	+ 26	? 27	N/A	? 42	? 42	++	++	++	+ 64	? 73	+ 87	N/A	+ 88
15. To reduce road congestion and the need to travel		+ 10	+ 28	+ 29	+ 29	+ 43	++	N/A	+ 65	N/A	N/A	++	? 89	+ 90	+91
16. To reduce greenhouse gases		+ 11	- 30	? 31	N/A	N/A	+ 39	N/A	- 66	- 66	++	+ 74	N/A	N/A	N/A
17. To ensure that the District is prepared for the impacts of climate change		- 12	? 32	+ 33	+ 33	N/A	N/A	N/A	- 66	- 66	++	? 75	N/A	N/A	N/A
18. Provide for employment opportunities		- 13	N/A	N/A	N/A	++	N/A	N/A	N/A	N/A	N/A	N/A	+92	++	+92
19. Make land available to meet the needs of the economy		? 14	N/A	N/A	N/A	++ RAAP	N/A	N/A	N/A	N/A	N/A	+ 76	N/A	++	N/A
20. Support economic growth which is inclusive, innovative and sustainable		+ 15	N/A	+ 34	+ 34	++ RAAP	+ 44	+ 67	N/A	N/A	+ 68	+ 77	+ 93	++	+ 93
21. To achieve sustainable production and use of resources		+ 16	+ 35	N/A	N/A	0	+ 45	+ 67	N/A	N/A	++	+ 78	N/A	+ 94	N/A
22. To increase energy efficiency of new and existing development.		+ 17	N/A	N/A	N/A	+ 46	N/A	N/A	- 66	- 66	++	N/A	N/A	N/A	N/A
23. To increase the production and use of renewable energy.		+ 18	- - 36	? 31	N/A	+ 46	N/A	+ 69	- 66	- 66	++	N/A	N/A	N/A	N/A

When the Sustainability Appraisal was carried out

The SA of the Core Strategy Preferred Options was carried out on 29 May 2008.

Who carried out the Sustainability Appraisal?

The Sustainability Appraisal was carried out by:

- Gavin Ball – Elmbridge Borough Council
- Chris Hobbs – Mole Valley District Council
- Tom Jones – Independent Consultant
- Raymond Dill – Reigate & Banstead Borough Council

Findings of Appraisal

> Option 1: Spatial Location of Development
>
> Sustainable levels, locations and forms of development will be sought in accordance with the stated objectives of this strategy and the objectives and policies of the South East Plan and the New Growth Points objectives.

6.1.1 The Preferred Option is the spatial strategy required by the South East Plan and includes the New Growth Point status. Appraisal has found that the Preferred Option has strong sustainability attributes, in particular the delivery of affordable housing in locations with good accessibility, the opportunity to enhance cultural assets, heritage and a sense of place in urban areas. A degree of uncertainty exists, however, with respect to finding the right balance between use of land for employment and housing, addressing climate change, and the more minor issue of noise and light nuisance. The importance of the Employment Land Review is recognised in that it will inform the quantity of employment land required and, ultimately, which sites should be retained.

6.1.2 Consideration should be given to the use of criteria in policy to ensure:
- quality of urban open space/public realm/green infrastructure
- delivery of affordable housing
- flood risk is addressed in Redhill and Horley
- infrastructure matches development in the long term
- opportunities to improve access by public transport, cycling and walking are maximised
- noise and light nuisance is limited

- provision of open space in accordance with Natural England's ANGST and to avoid increased recreational pressure on the Reigate to Mole Valley Escarpment SAC
- environmental benefits are maximised through the provisions of the Code for Sustainable Homes
- the Employment Land Review informs the quantity and location of employment land

6.1.3 The potential need to avoid adverse impact from development in river catchment through SuDS, green roofs and storage may justify bringing Code target dates forward.

> Option 2: Sustainable Development Principles
>
> The Preferred Option will set out sustainability criteria against which all proposals will be assessed. This will include making efficient use of land, including the use of previously developed land; minimising the impact on natural resources; multi-functional green infrastructure network; minimising the need to travel, whilst increasing opportunities to walk, cycle or use public transport; address the causes and consequences of climate change; protecting and enhancing the quality of the natural and built environment; and ensuring effective services, infrastructure and transport options.

6.1.4 Previous appraisal of Options D1a 'environmentally responsible design and construction', D2a, 'on site renewable technology' and D3a 'renewable energy infrastructure' at the Issues and Options stage identified a policy with criteria seeking to protect the environment and reduce the use of finite natural resources would strongly support sustainability objectives in general. Of particular benefit would be the ability to contribute to social well-being through alleviating fuel poverty and reducing the cost of utilities.

> Option 3   Plan, Monitor and Manage
>
> Sustainable levels, locations and forms of development will be delivered at a rate which reflects the adequacy of infrastructure and services to meet the needs of the development or alongside the ability to provide new or upgraded infrastructure.
>
> Develop and SPD on infrastructure contributions.

6.2.5 This option was appraised separately from the rest of the options as it was not drafted in time for the peer review. An appraisal of this option was carried out on 11th July 2008 by Council Officers, Caroline Keogh, Planning Policy Officer and Jacob Wallace, Policy Officer it was then reviewed and signed off by an independent consultant, Tom Jones.

6.2.6 This policy has been appraised from the viewpoint that 'development is a given'.

Appraisal has identified strong sustainability attributes and that adverse impacts are unlikely. Of particular importance, a policy of matching housing delivery to the adequacy of infrastructure and services would support the delivery of homes and communities that meet people's needs in terms of equality of access to services. It is assumed that accessibility to transport would be improved and that, in combination with a policy of developing in the most accessible areas, that the need to travel by private car would be reduced, to the benefit of limiting emission of greenhouse gases and improving air quality.

6.2.7 Adequate infrastructure provides the basis for sustainable economic growth, but a specific reference to communications infrastructure would ensure the policy supported 'smart growth'. The policy wording could emphasise how the infrastructure provided could be more in line with 'sustainable living' and give a greater indication of how adaptation to climate change could be incorporated. This could include energy efficiency, renewable energy infrastructure and the management of water would in accordance with the principles of SuDS.

> Option 4: Protecting our Valued Landscapes and Natural Environment
>
> The Preferred option will require continued protection and enhancement of AONBs, SSSIs and SACs, Green Belt, SNCIs and Local Nature Reserves, water courses, and flood plains, biodiversity of wildlife species and habitats, urban open space, wildlife corridors and valuable site-specific features such as hedgerows and riverside habitats.

6.2.8 Previous appraisal of Option C1a 'protect ecological, historical and aesthetically important areas' at the Issues and Options stage identified a strongly positive impact in relation to environmental capital; and appraisal of Option D1a 'environmentally responsible design and construction' identified

that policies and criteria seeking to protect the environment and reduce the use of finite natural resources strongly supported sustainability objectives in general. Similarly, appraisal of Option C2a, 'require high quality design of buildings and public spaces' demonstrated strong benefits were likely with respect to environmental and social themes.   The importance of design criteria to ensure wide-ranging benefits is apparent.

6.2.9   It is recognised that Green Belt policy represents a constraint on the provision of additional housing, although this is not likely to prevent achieving the delivery of sufficient affordable housing. Further potential conflict is identified through appraisal of Option D3a, 'support and encourage the development of renewable energy infrastructure in appropriate locations' between increasing renewable energy capacity and landscape and heritage designations.

6.2.10 Appraisal of Options C3a and C3b identified that the loss of urban open space for community infrastructure would have detrimental impacts socially and environmentally. An audit of open space would inform the understanding of what constitutes open space surplus to requirements.

6.2.11 Appraisal of the Preferred Option reiterates the prediction that protection of the natural and historic environment is not likely to prevent achieving sufficient affordable housing and the key area where potential conflict exists has been identified as delivering the South East Plan allocations and the New Growth Point requirements without losing valuable urban open land and without compromising flood risk.

6.2.12 It is recommended that policy and criteria seeks to address the following points:

- the need for design criteria to ensure wide ranging benefits
- the need for design advice to support and encourage the development of renewable energy infrastructure, particularly with landscape and heritage designations
- responding to an open space audit
- avoiding flood risk

Option 5: Green Infrastructure

The Preferred Option is to ensure that an overarching strategy is established incorporating local open space standards and requirements for developments to contribute towards the delivery of a comprehensive multi functional Green Infrastructure network. The Council will need to work in partnership with the public, private and voluntary sectors, which will also necessitate achieving a range of targets in relation to climate change, access to nature, biodiversity, health and well-being.

6.2.13 Appraisal of Options C1, C2, C3, D1, D2 and D3 (Issues and options Stage) identified positive impacts in relation to environmental capital and it is considered that a green infrastructure policy would provide the clarity and criteria to help maximise benefits such as incorporating renewable energy technologies into the urban environment and making best use of open space.

6.2.14 Appraisal of the spatial location of development (Preferred Option 1) identified the importance of quality of urban open space, the public realm and green infrastructure to balance a policy of high density housing. The following factors should be taken into account in drafting the general principles of green infrastructure:

- links with design guidance general and site specific design guidance
- setting appropriate tariff levels that achieve the aim without adversely affecting viability
- greening hard infrastructure
- identifying areas where the greatest benefits can be achieved as a priority, such as areas of high deprivation
- co-ordinating projects in the same water catchment area to address the risk associated with flash flooding
- use of green roofs
- wider use of SuDS
- avoiding conflict between recreation and protection of the most sensitive areas
- using landscaping/planting to address urban heat environment and for habitat provision.
- the contribution to smart growth

> Option 6 Sustainable Construction
>
> The Preferred Option is to ensure the reduction of the consumption of natural resources and to help deliver the aim of the Sustainable Community Plan, which is to promote zero and low carbon development and bring about environmental improvements in existing buildings. The following levels of the Code for Sustainable Homes and BREEAM will be required:
>
> - Up to 2010 Level 3 CSH and BREEAM good
> - Between 2010 – 2013 CSH Level 4 and BREEAM)Very Good
> - Between 2013 – 2016 CSH Level 5 and BREEAM Excellent
>
> In addition, a reduction in carbon dioxide emissions through the use of on-site renewable energy technologies at no less than 10% for all new developments; and be carbon neutral, with any shortfall being met by a financial contributions to enable residual carbon emissions to be offset elsewhere in the Borough.

6.2.15 Appraisal of Options C1, C2, C3, D1, D2 and D3 (Issues and options Stage) identified positive environmental and social impacts in relation to incorporating renewable energy technologies, notably reducing greenhouse gases and reducing fuel poverty.

6.2.16 A key finding of the appraisal of the spatial location of development (Preferred Option 1) identified the opportunity to maximise the benefits from introducing the Code for Sustainable Homes by bringing Code target dates forward. It is considered that a high density policy may enhance viability.

6.2.17 The likely benefits of the sustainable construction Preferred Option are improved water quality; reduced flood risk; enhanced biodiversity and 'natural environment' in urban areas; energy efficiency and reduced fuel poverty.

6.2.18 To maximise benefits, this could be linked to a carbon neutral policy that would allow offsetting carbon within the local community to address energy efficiency in the existing housing stock.

> Option 7: Development, Protection of Character and Heritage and Urban Design
>
> The Preferred Option is to require environmentally responsible design and construction including high quality design; the best use of the site; on-site renewable energy production; biodiversity; parking standards; and protection of Listed Buildings, Archaeological Sites, Historic Gardens, Conservation Areas; and Residential Areas of Special Character.

6.2.19 The Preferred Option has not been specifically appraised since it is a checklist of a range of PPS criteria rather than a true option. A key finding of the appraisal of the spatial location of development (Preferred Option 1), however, identified the importance of design in ensuring urban open space, the public realm and green infrastructure to balance a policy of high density housing. Appraisal of Option C1, C2, C3, D1, D2 and D3 (Issues and options Stage) identified positive impacts in relation to design to ensure incorporation of renewable energy technologies into the urban environment and making best use of open space. Other benefits include protect and enhancing ecological, historical and aesthetically important areas and minimising conflict with respect to noise and light and maximising daylight and privacy.

> Option 8: Economy
>
> The Preferred Option is to seek to maintain and increase employment growth in the Borough, taking a positive approach to enable small business start-ups and encourage living and working within the Borough. Continue to safeguard suitably located existing employment sites, and encourage new sectors and opportunities to enhance the skills offer, particularly linked to regeneration proposals within Redhill and Horley.

6.2.20 The Preferred Option is that required by the South East Plan and the New Growth Point status. Appraisal has found that the key issue with respect to the role of employment with the preferred locational strategy (Option 1) is to find the right balance between use of land for employment and housing, addressing climate change, and the more minor issue of noise and light nuisance. The importance of the Employment Land Review is recognised in that it will inform the quantity of employment land required and, ultimately, which sites should be retained. Consideration should be given to the use of

criteria based policy to ensure adverse impacts do not result with respect to the following:

- quality of urban open space/public realm required/green infrastructure
- delivery of affordable housing
- flood risk at Redhill and Horley
- infrastructure matching development in the long term
- maximising opportunities to improve access by public transport, cycling and walking
- avoiding noise and light nuisance through design criteria
- provision of open space in accordance with Natural England's ANGST to avoid increased recreational pressure on the Reigate to Mole Valley Escarpment SAC
- maximising the benefits from introducing the Code for Sustainable Homes
- taking the opportunities offered by mixed use for renewable energy and CHP

6.2.21   It is also noted that the potential need to avoid adverse impact from development in river catchment through SuDS and other measures may justify higher BREEAM requirements.

> **Option 9: Regional, Town and Local Centres**
>
> The Preferred option is to include policies that reinforce the multi-purpose role of regional, town and local centres by retaining and increasing provision of retail, social, community and leisure uses. Accommodate the majority of comparison growth in Redhill Town Centre. Accommodate appropriate trade offs encouraging vitality and viability to aid regeneration in Redhill and Horley Town Centres.

6.2.22   The Preferred Option has elements of Option F2a and F2b (Issues and Options). Previous appraisal indicated that regeneration could deliver social, economic and environmental benefits. The hybrid option allows regeneration initiatives to target areas of deprivation.

6.2.23   The strategy would facilitate the synergistic benefits of mixed use and supporting infrastructure to enable housing and other opportunities in the most accessible locations. The strategy would not preclude development in more rural areas, but the relative accessibility of more isolated settlements should be monitored. Specific benefits include:

- address flooding issue on a catchment area basis and use of SuDS

- public transport improvements
- revitalise town centres, particularly heritage and cultural assets
- energy efficiency improvements based on the application of BREEAM and CSH and CHP
- use of renewable energy technologies

Option 10: Regeneration

The Preferred Option is to regenerate Redhill and Horley town centres as a focal point for a mix of uses with high quality environments. Regenerate Preston and Merstham to enhance community facilities and improve the quality of life for residents. Proposals should increase accessibility and incorporate sustainable design.

Include a commitment to produce Area Action Plans or Supplementary Planning Documents for areas that meet some or all of the following criteria:

- The area is subject to development pressure and rapid change;
- The area suffers from poor environmental quality;
- The area contains communities with problems arising from social inequality.

6.2.24 In addition to the comments at Preferred Option 17, above, the Preferred Option responds to the need for environmental improvement and to maximise the benefits of access by public transport.

Option 11: Housing Delivery

The Preferred Option is to provide the allocated number of new homes between 2006 and 2026 in accordance with the Panel Report into the draft South East Plan requirement (August 2007) and the Borough's Growth Point status. This would be subject to the timely provision of the necessary supporting social and physical infrastructure and the creation of sustainable mixed communities and neighbourhoods throughout the Borough.

6.2.25 Appraisal has found that the Preferred Option has strong sustainability attributes with respect to accessibility and delivery of a sufficient quantity of affordable housing in Redhill and Horley, although there is a risk of an

overprovision of small units. In addition design criteria may be necessary to ensure quality of urban open space, the public realm and green infrastructure.

6.2.26 The strategy generally avoids impacts on designated areas and buildings and an opportunity for enhancement of urban areas through redevelopment exists, particularly at Redhill and Merstham. It may be necessary, however, to consider measures to avoid or mitigate increased recreational pressure on the Reigate to Mole Valley Escarpment SAC.

6.2.27 The strategy supports the economy in the respect that labour supply would have access to good transport infrastructure, although the high quantity of housing puts pressure on existing employment areas. The outcome of Employment Land Review will inform decisions in this respect. Whilst high density and accessibility may facilitate increased walking, cycling and public transport, the affect on existing AQMAs is uncertain.

6.2.28 Consideration should be given to including flood risk infrastructure within the policy, with particular reference to Redhill and Horley. This could facilitate maximum benefits through a co-ordinate approach based on catchment areas

6.2.29 The concerns raised may justify bringing Code target dates forward.

Option 12: Strategic Location of Housing

The Preferred Option is to direct higher density residential development to Redhill and in the urban areas, along the A23 Corridor, formulating appropriate housing density ranges for these areas and the rest of the Borough, after taking into account a range of factors (the character of areas, public transport, public services, resource efficiency and environmental impacts).

The specific densities for the borough will be identified in a SPD.

6.2.30 Appraisal of Preferred Option 1 and Preferred Option 5 indicate that a strategy of high density housing on previously developed land where this will have no net impact on flood risk is the most sustainable. Additional considerations have been made in this table with respect to the A23 focus. This has identified the importance of maximising the use of rail and bus to avoid over reliance on cars and that high potential exists for bus priority measures and improvement of quality and frequency of train services at Merstham, Coulsdon South, Salford, and Earlswood. The potential for a new rail station should also be considered.

> ### Option 13: Providing the Correct Type and Housing Mix
>
> The Preferred Option is to seek to secure the right mix of new housing sizes and types in the Borough to meet identified shortfalls in different areas; and meet future needs.

6.2.31 Appraisal has raised concern, however, that there may be an overprovision of small units in high density development. Whilst the Housing Needs Assessment will inform what the best mixes of housing size and type are and that the requirements of PPS3 would need to be met, it is considered that the key benefit of this Preferred Option would be address this issue and to help to maximise those who would benefit from good accessibility to employment and services. Consideration could also be given to whether lifetime homes standards might also help address this matter.

6.2.32 It is assumed that the Strategic Land Availability Assessment will eliminate areas of high flood risk and/or that policy will require appropriate tests to be met.

> ### Option 14: Gypsies and Travellers and Travelling Showmen
>
> The Preferred Option, taking into account the East Surrey Gypsy and Traveller Accommodation Assessment joint study, is to make provision for sites which meet an identified need that cannot reasonably be met on an existing or planned site; does not prejudice residential use or amenity; does not dominate the nearest settled community; can be adequately accessed by vehicles towing caravans and there is safe pedestrian and cycle access to the site; has reasonable accessible to local shops, medical services, schools and other community facilities on foot, bicycle or public transport; and, in the case of Travelling Showpeople, the site is suitable for the storage of large items of mobile equipment.
>
> Consideration will first be given to limited expansion of existing private sites in the Borough. There is a presumption against the development of Gypsy and Traveller sites (including Travelling Showpeople) in the Green Belt unless there are very special circumstances.

6.2.33 A policy based on the Preferred Option would help meet a specific need. The comments in the appraisal of Preferred Option 1 are relevant albeit with an increased risk that a greenfield location would be used. Where sites are provided in more urban locations, there would be improved accessibility and

integration. The criteria provide an appropriate range of consideration to ensure adverse impacts can be avoided.

Option 15: Affordable Housing

The Preferred option is to include an affordable housing policy that requires:
- All new housing developments comprising of 15 dwellings or more to provide at least 40 per cent of housing as affordable;
- For housing developments that fall below 15 dwellings, a financial contribution towards affordable housing is required, so that it can be provided elsewhere in the Borough.
- These payments are reduced for sites comprising of 0 to 10 dwellings and 10 –14 dwellings.

The mix of affordable housing shall be 70 percent affordable rent from affordable `housing and 30 per cent shared ownership or other immediate affordable tenure.

6.2.34 The key benefit of this policy is that it seeks to maximise the amount of affordable housing delivered in the plan period. Other than the physical provision itself, policy would achieve benefits in respect of improved health and wellbeing of the whole population, reducing poverty and social exclusion (particularly where this is in the most accessible locations) and, possibly to help create and maintain safer and more secure communities. The availability of affordable housing would also support the local labour supply, thus underpinning the economy.

6.2.35 Options considered previously identified that lowering the threshold (B1a) of 25 or more dwellings or sites of 1 hectare or more before requiring affordable housing would be likely to deliver more housing given the high density strategy, since this supports viability. Concern was expressed, however, that layout and design should seek to minimise social stratification. Not lowering the threshold (B2a) would increase risk not meeting affordable housing targets during the Plan period. A similar impact was predicted with respect to an increased requirement for the proportion of affordable housing (B2a and B2b).

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

contributions from commercial development (B5a) would support provision, although it may affect commercial viability.

> Option 16: Community Facilities and Infrastructure
>
> The Preferred Option is to encourage proposals that would increase the range or improve the quality and accessibility of community and leisure facilities in the Borough, and proposals that provide for a mix of compatible community services on a single site. The loss of existing leisure and community facilities would only be considered within this context or where it can be clearly demonstrated that a need no longer exists. Policy would also cover contributions from new development towards the infrastructure required to meet the needs created by new development.

6.2.37 Improved provision within the context of the preferred locational strategy, however, would generally have positive impacts with respect to sustainability. In particular, would be the improved cultural diversity in the main locations. The appropriate mix would be informed by a Retail and Leisure Study.

> Option 17: Parks and Recreation Improvements and Accessibility
>
> The Preferred Option proposes a commitment to review and seek to maintain balanced provision across the borough via joint efforts and improve (where necessary) the quality and accessibility of our parks and play facilities.

6.2.38 Whilst there would be general sustainability benefits, potential conflict exists between the aims of delivering higher density urban environments and ensuring a quality/quantity of parks and recreation in the appropriate location. Largely, this is a design matter and the following points should be considered in this respect:

- potential use for flood storage
- meeting Natural England ANGST
- potential to reduce/avoid impact on SAC
- address non car access
- need and balance would be established by a PPG17 audit

6.2.39 The scope of the Preferred option has been considered through appraisal of E1, E2, E3 and E4 (Issues and Options). The locational strategy seeks to place development in the most accessible locations. Appraisal of Option 12 (Preferred Options) has identified the importance to maximise the use of rail and bus to avoid over reliance on cars and that high potential exists for bus priority measures and improvement of quality and frequency of train services at Merstham, Coulsdon South, Salford, and Earlswood. The potential for a new rail station should also be considered. These measures should be considered.

6.2.40 Appraisal of E1, E3 and E4 (require provision for public transport, walking, cycling and car sharing) indicated the need for this Preferred Option to help balance accessibility and congestion. This supports a high density strategy. It is also an important element to avoid negative impacts associated with the revision of parking standards (E2), which without improved alternatives could have an adverse impact on accessibility for some groups.

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

Option 19: Accessibility

The Preferred Option is to direct development to accessible locations to reduce the need to travel, seek improvements in highway network to meet all street users' needs, to maximise efficiency of the movement network, seek to promote non-car travel and enhance accessibility along key corridors and at hubs, in particular promote Redhill/Reigate as a Transport Hub.

More specifically, the Council will work with Surrey County Council, Highways Agency, Network Rail and the private sector, and require development proposals to achieve the above, including through the use of contributions, promoting car sharing/car clubs/car pools and assessing the impact of traffic generated by new development in an accompanying transport assessment/statement.

6.2.42 The locational strategy seeks to place development in the most accessible locations. Appraisal of Option 12 (Preferred Options) has identified the importance of maximising the use of rail and bus to avoid over reliance on cars and that high potential exists for bus priority measures and improvement of quality and frequency of train services at Merstham, Coulsdon South, Salford, and Earlswood. The potential for a new rail station should also be considered.

6.2.43 Appraisal of E1, E3 and E4 (require provision for public transport, walking, cycling and car sharing) indicated the need for the elements of this Preferred Option to help balance accessibility and congestion and support a high density strategy. It is also an important element to avoid negative impacts associated with the revision of parking standards (E2), which without improved alternatives could have an adverse impact on accessibility for some groups.

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

> Option 20: Parking
>
> The Preferred Option is to implement graduated parking standards to allow different levels of off-street and on-street parking provision depending on an area's accessibility to services by walking, cycling and public transport.
>
> A more strategic approach would be taken to the overall level of provision of parking in Redhill and Horley town centres to provide for different types of users.

6.2.45 In addition to the comments at Preferred Option 18 and Preferred Option 19, above, it is noted that appraisal of E1, E3 and E4 (require provision for public transport, walking, cycling and car sharing) indicated the need for this Preferred Option to help balance accessibility and congestion; and support a high density strategy. The combination of all three options is important to avoid negative impacts associated with the revision of parking standards (E2), which without improved alternatives could have an adverse impact on accessibility for some groups.

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

> Option 21: Aviation
>
> The Preferred Option is to seek to minimise the environmental impact of a one runway, two terminals airport at Gatwick.
>
> Oppose expansion at Gatwick Airport and intensification Redhill Aerodrome.

6.2.47 Appraisal of Option E5a (maintain position), at the Issues and Options stage indicated that a restrictive approach may prevent worsening congestion and air quality in the Borough. Even without an additional runway, however, the existing airport will continue to attract an increasing number of passengers annually, which will see a continuation of environmental problems into the foreseeable future. In particular, traffic congestion and poor air quality in some parts of Horley. Resisting a further runway will encourage more effective use of the facility.

6.2.48 It is not considered to be of any additional value to appraise Redhill Aerodrome separately since the site lies in the Green Belt and significant intensification of development would be inappropriate. Planning

applications are lodged in tandem with Tandridge DC and reference should be made to the Tandridge Core Strategy for comparable policy approach.

Submission 2009

The Submission version of the Core Strategy SA was published in November 2009, and was undertaken by Tom Jones (Independent Consultant).

Results of the appraisal

CS1: Valued Landscapes				
SA Objective	**Assessment**			
	Short Term	Medium Term	Long Term	***Comments\Proposed Mitigation***
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	0	0	0	The Housing Statement indicates that housing needs can be met in existing urban areas. Policy CS9, Policy CS10 and Policy CS11 are important measures to ensure high density development is delivered without compromising the need for urban open land and urban biodiversity. Whilst it is predicted that adverse impacts are not likely, the balance between the two should be monitored.
2. To facilitate the improved health and wellbeing of the whole population.	+	+	+	Access to open space is a key factor in supporting good health.
3. To reduce poverty and social exclusion.	+	+	+	Access to open space and the natural environment is a key factor in supporting social inclusion. The comments in SAO1 and SAO2, above, are relevant. A further element is the need to balance good access by public transport, cycling and walking with disturbance to habitats. These points can be addressed in Policy CS17 (see later) and will be a principle consideration in the Appropriate Assessment for the SPAs and SACs in the Borough.
4. To create and maintain safer and more secure communities.	0	0	0	Whilst safety in areas of open space and the countryside is important, it is a not a significant matter in the context of a strategic appraisal.

Objective				Comments
5. To minimise the harm from flooding.	+	+	+	By area, the most substantial flooding is in areas where there is no development. Retaining the capacity to act as flood storage supports this objective. This is also addressed in Policy CS9, Policy CS10 and Policy CS11. Further work with respect to the multi benefits of green infrastructure should seek to maximise the combination of open space and SUDS to address the issue in urban areas. This can also be linked to supporting urban biodiversity.
6. To improve accessibility to all services and facilities.	0	0	0	The comments in SAO3, above, cover the scope for this strategic appraisal.
7. To make the best use of previously developed land and existing buildings.	+	+	+	The protection of landscapes and the natural environment will direct development to pdl.
8. To reduce land contamination and safeguard soil quality and quantity.	+	+	+	The protection of landscapes and the natural environment will direct development to pdl and protect soil quality. Where contaminated land is located in rural areas the policy may prevent the use of funds raised through development to finance remediation. Whilst this could reduce options, it is consistent with the polluter pays principle established in PPS23.
9. To ensure air quality continues to improve.	?	?	?	Whilst air quality in protected areas is likely to be maintained, the policy will direct development to urban areas. Policies CS16 and CS17 seek to address the potential problem that congestion might lead to deteriorating air quality.
10. To reduce noise pollution.	0	0	0	By directing development to urban areas, Policy CS1 helps to minimise additional noise in protected areas. The ability to affect a reduction in noise pollution will only arise when planning applications come forward with respect to existing uses. It is considered that the provisions of PPS23 and Environmental Health controls would be the appropriate methods to address this.
11. To reduce light pollution.	0	0	0	By directing development to urban areas, Policy CS1 helps to minimise additional light pollution in protected areas. The ability to affect a reduction in light pollution will only arise when planning applications come forward with respect to existing uses. It is considered that application of the provisions of the Institute of Light Engineers Guidance would be the appropriate measure to address this.

Objective				Commentary
12. To maintain and improve the water quality of the region's rivers and groundwater	+	+	+	By directing development to urban areas, Policy CS1 protects water resources. This is also addressed in Policy CS9, Policy CS10 and Policy CS11. Further work with respect to the multi benefits of green infrastructure should seek to maximise the combination of open space and SUDS to address the issue in urban areas.
13. To conserve and enhance biodiversity within the plan area	+	+	+	Policy CS1 protects the identified habitats of biodiversity importance. Further work with respect to Appropriate Assessment for the SPAs and SACs in the Borough will inform a mitigation plan to avoid harm in the most sensitive areas.
14. To protect and enhance the natural, archaeological, historic environments and cultural assets	+	+	+	Policy CS1 protects, in combination with Policy CS2 and Policy CS9, the identified important assets of the Borough. The detail of Area Action Plans will be the principle measure in ensuring this objective is met.
15. To reduce road congestion and the need to travel	?	?	?	Policy CS1 will direct development to urban areas. Policies setting out the locational strategy and layout/design for housing (CS5, CS6, CS7, CS8, CS9, CS10, and CS11) and policies concerning accessibility (CS16 and CS17) seek to address the potential to increase congestion.
16. To reduce greenhouse gases	?	?	?	Whilst air quality in protected areas is likely to be maintained, the policy will direct development to urban areas. Policies CS16 and CS17 seek to address the potential problem that congestion might lead to deteriorating air quality.
17. To ensure that the District is prepared for the impacts of climate change	+	+	+	The importance of linking green areas is noted with respect to providing corridors for the movement of species and this can be addressed through measures to establish green infrastructure (Policy CS9 and Policy CS10). Woodland habitats provide opportunities for people to enjoy a shaded environment. The regeneration of the urban areas of the Borough provides an opportunity to address climate change.
18. Provide for employment opportunities	+	+	+	The natural environment provides opportunities for recreation and tourism. Further work with respect to Appropriate Assessment for the SPAs and SACs in the Borough will inform a mitigation plan to avoid harm in the most sensitive areas.

19. Make land available to meet the needs of the economy	0	0	0	The ELR indicates that land for commercial development can be met in existing urban areas. Policy CS9, Policy CS10 and Policy CS11 are important measures to ensure high density mixed development is delivered without compromising the need for urban open land and urban biodiversity. Whilst it is predicted that adverse impacts are not likely, the balance between the two should be monitored.
20. Support economic growth which is inclusive, innovative and sustainable	0	0	0	The natural environment of the Borough is a principle factor in the attractiveness for investment.
21. To achieve sustainable production and use of resources	+	+	+	The policy provides a control on the consumption of resources. The issue is addressed in detail in the Surrey Minerals Local Plan, the Surrey Waste Local Plan and the AONB Management Plan.
22. To increase energy efficiency of new and existing development.	0	0	0	Policy CS1 has no bearing on this objective.
23. To increase the production and use of renewable energy.	?	?	?	The implications of a restrictive policy are not clear with respect to opportunities for renewable energy outside the urban environment. Policy CS9 and Policy CS11 provide the basis for further work and this can be informed by the Borough Wide Character Assessment.

Summary: The policy provides a strong basis to direct new development to appropriate locations, avoiding adverse impacts on the landscape and natural environment. The following points are recommended:

- Monitor the balance achieved between high density development and the delivery of urban open land and urban biodiversity
- Policy CS16, Policy CS17 and emerging Appropriate Assessment to address accessibility to the natural environment to support health and social inclusion but not lead to adverse impacts on the most sensitive habitats
- Further work with respect to the multi benefits of green infrastructure and linking wildlife habitats

Audit trail: Appraisal of spatial options for development (See Option 1, Appendix 1) indicates the importance of the quality of urban open space/public realm/green infrastructure to human health and this has been picked up in CS9 (Sustainable Development), CS10 (Infrastructure Delivery), CS11 (Sustainable Construction). The recommendation from appraisal of Option 3b, 'protecting valued landscapes and the natural environment' that policy and criteria seek to address the need for design criteria to ensure wide ranging benefits has been addressed to a degree, but further work is recommended with respect to the multi benefits of green infrastructure and linking wildlife habitats. This can be informed by the Open Space Audit and taken forward in the Green Infrastructure Strategy, the Site Allocations DPD, the Borough Design Guide, and Area Action Plans.

CS2:   Valued Townscapes

SA Objective	Assessment			Comments\Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	0	0	0	The Housing Statement indicates that housing needs can be met in existing urban areas. Policy CS2 works with Policy CS9, Policy CS10 and Policy CS11 to ensure that high density development is delivered without compromising the quality of the urban environment, including heritage. The detail of how this balance can be achieved can be set out in the Site Allocations DPD, the Design SPD and Area Action Plans. The Borough Wide Character Assessment will inform these documents.
2. To facilitate the improved health and wellbeing of the whole population.	+	+	+	Policy CS2 includes reference to environmental factors that would support health and well being. This issue is also covered in Policy CS9, Policy CS10 and Policy CS11. It may be clearer to address the general issues in Policy CS9 such that Policy CS2 could concentrate on balancing adaptation and heritage interests. Either way, the detail would most likely be provided by a County wide or Borough wide Design SPD.
3. To reduce poverty and social exclusion.	0	0	0	Whilst enhanced character would support community identity, protection of character is not likely to lead to a significant adverse or beneficial impact on social inclusion or safer communities.
4. To create and maintain safer and more secure communities.	0	0	0	
5. To minimise the harm from flooding.	?	?	?	Detailed design guidance could address the use of SUDS in the adaptation of heritage buildings.
6. To improve accessibility to all services and facilities.	0	0	0	The protection of heritage is not likely to have a significant impact on accessibility to services and facilities.
7. To make the best use of previously developed land and existing buildings.	?	?	?	The Site Allocations DPD, Area Action Plans and Design Guidance will need to address the reuse of heritage buildings. Policy CS2 can set the agenda.
8. To reduce land contamination and safeguard soil quality and quantity.	?	?	?	The Site Allocations DPD, Area Action Plans and Design Guidance will need to address the reuse of heritage buildings. Policy CS2 can set the agenda. PPS23 suggests that the need to remediate contamination which threatens human health may outweigh the need to protect heritage interests.
9. To ensure air quality continues to improve.	0	0	0	The protection of heritage is not likely to have a significant impact on air quality.

10. To reduce noise pollution.	0	0	0	The protection of heritage is not likely to have a significant impact on noise pollution.
11. To reduce light pollution.	?	?	?	The Site Allocations DPD, Area Action Plans and Design Guidance will need to address the reuse/use of heritage buildings. Policy CS2 can set the agenda. This could include the use of lighting/illumination.
12. To maintain and improve the water quality of the region's rivers and groundwater	0	0	0	The protection of heritage is not likely to have a significant impact on the water environment.
13. To conserve and enhance biodiversity within the plan area	?	?	?	The Site Allocations DPD, Area Action Plans and Design Guidance will need to address the reuse/use of heritage buildings. Policy CS2 can set the agenda. This could include biodiversity.
14. To protect and enhance the natural, archaeological, historic environments and cultural assets	+	+	+	Policy CS2 protects, in combination with Policy CS1 and Policy CS9, the identified important assets of the Borough. The detail of Area Action Plans will be the principle measure in ensuring this objective is met.
15. To reduce road congestion and the need to travel	0	0	0	The protection of heritage is not likely to have a significant impact on congestion.
16. To reduce greenhouse gases	?	?	?	The Site Allocations DPD, Area Action Plans and Design Guidance will need to address adaptation of heritage buildings. Policy CS2 can set the agenda.
17. To ensure that the District is prepared for the impacts of climate change	?	?	?	The Site Allocations DPD, Area Action Plans and Design Guidance will need to address the reuse of heritage buildings. Policy CS2 can set the agenda.
18. Provide for employment opportunities	+	+	+	The historic environment provides opportunities for employment, particularly tourism. The detail of Area Action Plans will be the principle measure in ensuring this objective is met.
19. Make land available to meet the needs of the economy	0	0	0	The protection of heritage is not likely to have a significant impact on the availability of employment land.
20. Support economic growth which is inclusive, innovative and sustainable	+	+	+	Heritage is an integral part of sustainable economic growth.

SA Objective	Assessment			Comments\Proposed Mitigation
21. To achieve sustainable production and use of resources	?	?	?	The Site Allocations DPD, Area Action Plans and Design Guidance will need to address adaptation of heritage buildings. Policy CS2 can set the agenda.
22. To increase energy efficiency of new and existing development.	?	?	?	
23. To increase the production and use of renewable energy.	?	?	?	

Summary: Heritage is an integral part of sustainable economic growth and sustainable communities. It is recommended that the Site Allocations DPD, Area Action Plans and Design Guidance address the reuse and adaptation of heritage buildings and that he agenda is set by Policy CS2. This would include ensuring that high density development is delivered without compromising the quality of the urban environment, including heritage and integrating lighting/illumination, biodiversity, SUDS, energy efficiency and renewable energy. PPS23 suggests that the need to remediate contamination which threatens human health may outweigh the need to protect heritage interests. The Borough Wide Character Assessment will inform these documents.

The text of Policy CS2 could be amended to more clearly identify that the general issues of 'environmentally responsible design' are covered in the text of Policy CS9. Policy CS2 could then concentrate on balancing adaptation and heritage interests. Either way, the detail would most likely be provided by a County wide or Borough wide Design SPD.

Audit trail: Appraisal of spatial options for development (Option 1, PO May 2008) indicates the importance of the quality of the public realm and appraisal of Option 17 (PO May 2006) identified the important role of heritage in regeneration. Potential conflict was identified through appraisal of Option D3a, 'support and encourage the development of renewable energy infrastructure in appropriate locations' (Issues and Option 2005) between increasing renewable energy capacity and landscape and heritage designations. This has been picked up in Policy CS2, albeit that appraisal now recommends further refinement of the policy.

CS3: Valued People				
SA Objective	Assessment			Comments\Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	0	0	0	The Employment Land Review indicates that land for commercial development can be met in existing urban areas without compromising the ability to meet housing targets. Policy CS9, Policy CS10 and Policy CS11 are important measures to ensure high density mixed development is delivered without compromising the need for urban open land and urban biodiversity. Whilst it is predicted that adverse impacts are not likely, the balance between the two should be monitored.

2. To facilitate the improved health and wellbeing of the whole population.	+	+	+	A successful economy would support health and well being. The second part of the policy specifically seeks to improve access to health services and to improve opportunities for education.
3. To reduce poverty and social exclusion.	+	+	+	In addition to the comments in SAO2, above, the second part of the policy seeks to address deprivation caused by a cycle of poor education, low pay and poor health.
4. To create and maintain safer and more secure communities.	+	+	+	In addition to the comments in SAO2, above, the second part of the policy seeks to support the delivery of the Local Community Action Plan
5. To minimise the harm from flooding.	0	0	0	This objective is addressed sufficiently in Policies CS9, CS10 and CS11.
6. To improve accessibility to all services and facilities.	?	?	?	Whilst it is inherent that Policy CS3 would improve access to services and facilities, the policy may be stronger if it were clarified whether the policy actively seeks to support improvement to access where it is currently poor.
7. To make the best use of previously developed land and existing buildings.	+	+	+	Regeneration is an integral part of Policy CS3.
8. To reduce land contamination and safeguard soil quality and quantity.	+	+	+	Regeneration is an integral part of Policy CS3.
9. To ensure air quality continues to improve.	?	?	?	Policy CS3 implies high density mixed development in urban areas. Policies CS16 and CS17 seek to address the potential problem that congestion might lead to deteriorating air quality.
10. To reduce noise pollution.	0	0	0	It is unlikely that noise pollution would deteriorate. Where regeneration proposals come forward, it will be important to ensure noise pollution standards set out in PPS23 are met.
11. To reduce light pollution.	0	0	0	Where regeneration proposals come forward, it will be important to ensure standards for lighting set out in the Institute of Light Engineers Guidance is followed.
12. To maintain and improve the water quality of the region's rivers and groundwater	?	?	?	The impact will depend on the location and nature of proposals that come forward. Whilst policy criteria can be set to avoid adverse impact (Policies CS9, 10 and 11), this can be fully addressed in the detail of the Site Allocations DPD and Area Action Plans.
13. To conserve and enhance biodiversity within the plan area	?	?	?	The impact will depend on the location and nature of proposals that come forward. Whilst policy criteria can be set to avoid adverse impact (Policies CS9, 10 and 11), this can be addressed fully in the detail of the Site Allocations DPD and Area Action Plans.

14. To protect and enhance the natural, archaeological, historic environments and cultural assets	?	?	?	The impact will depend on the location and nature of proposals that come forward. Whilst policy criteria can be set to avoid adverse impact – (Policy CS1, CS2 and CS9) this can be addressed fully in the Site Allocations DPD, Area Action Plans and the Design Guide SPS.
15. To reduce road congestion and the need to travel	?	?	?	Policy CS3 implies high density mixed development in urban areas. Policies CS16 and CS17 seek to address the potential problem of congestion.
16. To reduce greenhouse gases	+	+	+	Regeneration provides an opportunity to improve the performance of commercial buildings. Policies CS9, 10 and 11 set the context and this can be addressed fully in the detail of the Site Allocations DPD and Area Action Plans.
17. To ensure that the District is prepared for the impacts of climate change	+	+	+	Regeneration provides an opportunity to improve the performance of commercial buildings and accessibility to services in the context of climate change. Policies CS9, 10 and 11 set the context and this can be addressed fully in the detail of the Site Allocations DPD and Area Action Plans.
18. Provide for employment opportunities	+	+	+	Whilst a key objective of the Policy CS3, it may be stronger if it were clarified whether the policy actively seeks to support improvement to access where it is currently poor.
19. Make land available to meet the needs of the economy	+	+	+	The ELR indicates that land for commercial development can be met in existing urban areas.
20. Support economic growth which is inclusive, innovative and sustainable	+	+	+	Regeneration provides an opportunity to improve the quality of commercial buildings. Policies CS9, 10 and 11 set the context and this can be addressed fully in the detail of the Site Allocations DPD, Area Action Plans and Design Guidance SPD.
21. To achieve sustainable production and use of resources	+	+	+	
22. To increase energy efficiency of new and existing development.	+	+	+	
23. To increase the production and use of renewable energy.	+	+	+	High density mixed use provides a major opportunity to improve the capacity of renewable energy. This can be addressed fully in the detail of the Site Allocations DPD and Area Action Plans.

Summary: The ELR indicates that land for commercial development can be met in existing urban areas. It will be important to ensure that high density mixed development is delivered without compromising the need for urban open land and urban biodiversity. Whilst it is predicted that adverse impacts are not likely, the balance between the two should be monitored.

Regeneration provides an opportunity to improve the performance of commercial buildings and accessibility to services in the context of climate change. In addition high density mixed use provides a major opportunity to improve the capacity of renewable energy.   Policies CS9, 10 and 11 set the context and this can be addressed fully in the detail of the Site Allocations DPD and Area Action Plans. Similarly, specific issues relating to Noise, light, the water environment, biodiversity can be addressed in the Site Allocations DPD, Area Action Plans and Design Guidance SPD.

Whilst it is inherent that Policy CS3 would improve access to employment, services and facilities, the policy may be stronger if it were clarified whether the policy actively seeks to support improvement to access where it is currently poor.

Audit trail: Option 1 (PO May 2006) 'the locational strategy', Option 5 'housing delivery' and Option 7 'housing mix' … balance between housing and employment … ELR. Option 16 (PO May 2006) … Consideration should be given to the use of criteria based policy to ensure adverse impacts do not result with respect to the following:

- quality of urban open space/public realm required/green infrastructure
- delivery of affordable housing
- flood risk at Redhill and Horley
- infrastructure matching development in the long term
- maximising opportunities to improve access by public transport, cycling and walking
- avoiding noise and light nuisance through design criteria
- provision of open space in accordance with Natural England's ANGST to avoid increased recreational pressure on the Reigate to Mole Valley Escarpment SAC
- maximising the benefits from introducing the Code for Sustainable Homes
- taking the opportunities offered by mixed use for renewable energy and CHP

these points have been picked up in Policy CS1 (landscape, natural environment), Policy CS2 (heritage), Policies CS9, 10 and 11 (green infrastructure, heritage, public realm), Policy CS15 (Affordable Housing) and Policies 16 and 17 (accessibility). The details with respect to flood risk at Redhill and Horley, noise, light and sustainable design can be addressed in detail addressed in the Site Allocations DPD, Area Action Plans and Design Guidance SPD.

CS4: Strategic locations for growth				
SA Objective	**Assessment**			
	Short Term	Medium Term	Long Term	***Comments\Proposed Mitigation***
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	+	+	+	The Housing Position Statement anticipates that a surplus of dwellings can be delivered to March 2022 through allocations in urban areas as described in Policy CS4.
2. To facilitate the improved health and wellbeing of the whole population.	+	+	+	Meeting housing need in accessible areas will support health. Other policies will need to ensure that high density development does not compromise the ability to address congestion and deliver sufficient formal open space.
3. To reduce poverty and social exclusion.	+	+	+	Meeting housing need in accessible areas will support social inclusion.

4. To create and maintain safer and more secure communities.	0	0	0	Policy CS4 does not guarantee safe communities. This can be addressed in Area Action Plans and a Design Guidance SPD.
5. To minimise the harm from flooding.	?	?	?	The locational strategy is informed by Strategic Flood Risk Assessments and the Borough Wide Character Assessment. The strategy is compatible with PPS25 but detailed flooding issues will need to be addressed in the Site Allocations DPD, Area Action Plans and Design Guidance.
6. To improve accessibility to all services and facilities.	+	+	+	Meeting housing need in accessible areas will support social inclusion.
7. To make the best use of previously developed land and existing buildings.	+	+	+	Policy CS4 provides the basis for meeting the Surrey Structure Plan target of 80% of all new development on pdl.
8. To reduce land contamination and safeguard soil quality and quantity.	+	+	+	Policy CS4 provides the basis for meeting the Surrey Structure Plan target of 80% of all new development on pdl. The need for a policy/criteria to set out exceptional circumstances with respect to contributions in the Site Allocations DPD and Area Action Plans can draw on the experience of the implementation of the Planning Obligations and Infrastructure SPD.
9. To ensure air quality continues to improve.	+	+	+	Policy CS16, Policy CS17, and Policy CS18 seek to ensure that high density development does not compromise the ability to address congestion and, consequently, the potential to exacerbate air quality, particularly in AQMAs.
10. To reduce noise pollution.	+	+	+	In directing development to existing urban areas, the more tranquil rural areas are less likely to be exposed to additional noise. All new development will be required to meet the standards of building regulations and of PPS23 and this can be clarified in Design Guidance where necessary.
11. To reduce light pollution.	+	+	+	In directing development to existing urban areas, rural areas are less likely to be exposed to additional light pollution. Design Guidance could clarify standards and requirements in new development.
12. To maintain and improve the water quality of the region's rivers and groundwater	+	+	+	Policy CS4 works with Policy CS1 to protect the more vulnerable water environments. Regeneration offers and opportunity to identify and improve the management of water in urban areas through the application of SUDS. This is required by Policy CS11 through the application of the Code for Sustainable Homes.

13. To conserve and enhance biodiversity within the plan area	+	+	+	Policy CS4 works with Policy CS1 to protect the more sensitive habitats. Regeneration offers and opportunity to enhance biodiversity through the application of a green infrastructure policy and the Code for Sustainable Homes (see Policies CS9, 10 and 11).
14. To protect and enhance the natural, archaeological, historic environments and cultural assets	+	+	+	Policy CS4 works with Policy CS2 to protect cultural and heritage assets. Regeneration offers and opportunity to enhance local distinctiveness. Policy CS6 sets the agenda and the Site Allocations DPD, Area Action Plan and design guidance can draw on the Borough Wide Character Assessment to ensure important assets are protected.
15. To reduce road congestion and the need to travel	+	+	+	Policy CS16, Policy CS17 and Policy CS18 seek to ensure that high density development does not compromise the ability to address congestion.
16. To reduce greenhouse gases	+	+	+	Policy CS16, Policy CS17 and Policy CS18 seek to ensure that high density development does not compromise the ability to address congestion and reducing the need to travel and, consequently, the potential to increase greenhouse gas emissions. See also SAO5, 12, 17, 21, 22 and 23.
17. To ensure that the District is prepared for the impacts of climate change	+	+	+	Regeneration provides an opportunity to improve the performance of commercial buildings and accessibility to services in the context of climate change. Policies CS9, 10 and 11 set the context and this can be addressed fully in the detail of the Site Allocations DPD and Area Action Plans.
18. Provide for employment opportunities	+	+	+	The locational strategy has been informed by accessibility mapping. This addresses the concern raised in the appraisal of Policy CS3 to an extent.
19. Make land available to meet the needs of the economy	+	+	+	The ELR indicates that land for commercial development can be met in existing urban areas.
20. Support economic growth which is inclusive, innovative and sustainable	+	+	+	Regeneration provides an opportunity to improve the quality of commercial buildings. Policies CS9, 10 and 11 set the context and this can be addressed fully in the detail of the Site Allocations DPD, Area Action Plans and Design Guidance SPD.
21. To achieve sustainable production and use of resources	+	+	+	

22. To increase energy efficiency of new and existing development.	+	+	+	
23. To increase the production and use of renewable energy.	+	+	+	High density mixed use provides a major opportunity to improve the capacity of renewable energy. This can be addressed fully in the detail of the Site Allocations DPD and Area Action Plans.

Summary: The Housing Position Statement anticipates that a surplus of dwellings can be delivered to March 2022 through allocations in urban areas. Policy CS4 provides the basis for meeting the Surrey Structure Plan target of 80% of all new development on pdl.

Meeting housing need in accessible areas will support health objectives and Policy CS9, Policy CS10 and Policy CS11 seek to ensure that high density development does not compromise the ability to deliver sufficient formal open space. Policy CS17 and Policy CS18 seek to ensure that high density development does not compromise the ability to address congestion and, consequently, the potential to exacerbate air quality, particularly in AQMAs as well as the potential to increase greenhouse gas emissions. The locational strategy is informed by Strategic Flood Risk Assessments and the Borough Wide Character Assessment and the strategy is compatible with PPS25 but detailed flooding issues will need to be addressed in the Site Allocations DPD, Area Action Plans and Design Guidance. Policy CS1 identifies protection of the floodplain as a key consideration for development proposals.

The locational strategy has been informed by accessibility mapping. This addresses, to an extent, the concern raised in the appraisal of Policy CS3 that the Policy should more clearly support good accessibility. Policy CS5 also consolidates the preference for locations with good accessibility.

Regeneration also provides an opportunity to improve the quality of commercial buildings. Policies CS9, 10 and 11 set the context and this can be addressed fully in the detail of the Site Allocations DPD, Area Action Plans and Design Guidance SPD. High density mixed use provides a major opportunity to improve the capacity of renewable energy. This can be addressed fully in the detail of the Site Allocations DPD and Area Action Plans.

Policy CS4 works with Policy CS1 and Policy CS2 to protect biodiversity, cultural and heritage assets and the water environment and regeneration offers and opportunity to enhance all these aspects. Policy CS6, Policy CS9, Policy CS10 and Policy CS11 set the agenda in this respect and the Site Allocations DPD, Area Action Plan and design guidance can draw on the Borough Wide Character Assessment to ensure improvements. The need for policy/criteria to set out exceptional circumstances with respect to contributions in the Site Allocations DPD and Area Action Plans can draw on the experience of the implementation of the Planning Obligations and Infrastructure SPD.

Audit trail: Appraisal of Option 1 (May 2006) considered that the Preferred Option is of planning for the New Growth Point has strong sustainability attributes, in particular the delivery of affordable housing in locations with good accessibility, the opportunity to enhance cultural assets, heritage and a sense of place in urban areas. It was noted that a degree of uncertainty exists, however, with respect to finding the right balance between use of land for employment and housing, addressing climate change, and the more minor issue of noise and light nuisance. Drawing on the findings of the Borough Wide Character Assessment and the Employment Land Review, the Core Strategy policies seek to address these matters, as detailed below.

Options A1, A2 and A3 (Issues and Options 2005) explored the potential for development in the green belt with respect to sustainability issues. Option A1 considered the use of greenfield land to contribute to development needs and found that there was a great deal of uncertainty, particularly with respect to avoiding harm to landscape, biodiversity and the water environment; potential problems with respect to flooding; and uncertainty in terms of ensuring good accessibility to services, social inclusion and reducing the need to travel.

CS5: **Allocations for development**

SA Objective	Assessment			Comments\Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.				See summary
2. To facilitate the improved health and wellbeing of the whole population.				
3. To reduce poverty and social exclusion.				
4. To create and maintain safer and more secure communities.				
5. To minimise the harm from flooding.				
6. To improve accessibility to all services and facilities.				
7. To make the best use of previously developed land and existing buildings.				
8. To reduce land contamination and safeguard soil quality and quantity.				
9. To ensure air quality continues to improve.				
10. To reduce noise pollution.				
11. To reduce light pollution.				
12. To maintain and improve the water quality of the region's rivers and groundwater				
13. To conserve and enhance biodiversity within the plan area				
14. To protect and enhance the natural, archaeological, historic environments and cultural assets				
15. To reduce road congestion and the need to travel				
16. To reduce greenhouse gases				
17. To ensure that the District is prepared for the impacts of climate change				

18. Provide for employment opportunities				
19. Make land available to meet the needs of the economy				
20. Support economic growth which is inclusive, innovative and sustainable				
21. To achieve sustainable production and use of resources				
22. To increase energy efficiency of new and existing development.				
23. To increase the production and use of renewable energy.				

Summary: Policy CS5 consolidates the preference for locations with good accessibility.

Audit trail: Appraisal of Option 17 'regional, local and town centres' (PO May 2006) and Option F2a 'focussed regeneration' and F2b 'no focus for regeneration' (Issues and Options, 2005) indicated that regeneration could deliver social, economic and environmental benefits and that a focussed approach could target areas of deprivation. Policy CS5 is informed by the Borough Wide Character Assessment and supports such an approach.

Appraisal of Option 18 'regeneration' (PO May 2006) identified similar likely impacts and highlighted the importance of the need for environmental improvement and to maximise the benefits of access by public transport. These issues are addressed in Policies CS9, 10, 11, 16, 17 and 18.

CS6: Area 1, North Downs				
SA Objective	**Assessment**			
	Short Term	Medium Term	Long Term	*Comments\Proposed Mitigation*
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	+	+	+	Supplemented by Policy CS13, Policy CS15 and the Planning Contributions SPD, development in Banstead and Preston will make a substantial contribution to this objective.
2. To facilitate the improved health and wellbeing of the whole population.	+	+	+	The provision of housing, employment and retail in the most accessible part of the Borough supports this objective. The Site Allocations DPD and Area Action Plans can provide further provisions with respect to health and well being objectives.

Objective				Commentary
3. To reduce poverty and social exclusion.	+	+	+	The provision of housing and employment in the most accessible settlement in the north of the Borough supports this objective. Regeneration at Preston can address deprivation. The Site Allocations DPD and Area Action Plans can provide further provisions with respect to social inclusion.
4. To create and maintain safer and more secure communities.	0	0	0	A new community facility is planned as part of the Preston Regeneration Area and the New Growth Points Programme. Further benefits can be addressed in a Design Guidance SPD.
5. To minimise the harm from flooding.	?	?	?	The Site Allocations DPD and Area Action Plan will need to address flood risk.
6. To improve accessibility to all services and facilities.	+	+	+	Banstead is identified as on of three town centres in the Borough. The provision of housing, employment and retail in the most accessible part of the Borough supports this objective, although no specific proposals are put forward at this stage. The Site Allocations DPD and Area Action Plans can provide further provisions with respect to improving provision for cycling, walking, public transport, car parking and other measures to address congestion. Policies CS 16, 17 and 18 set the context.
7. To make the best use of previously developed land and existing buildings.	+	+	+	Policy CS6 seeks to ensure that the Surrey Structure Plan's overall target of 80% new development on pdl can be met.
8. To reduce land contamination and safeguard soil quality and quantity.	+	+	+	Policy CS6 supports the objective of remediation of contaminated land. The provisions of the Planning Obligations SPD supplement this by setting out the context for abnormal costs.
9. To ensure air quality continues to improve.	+	+	+	Whilst it is anticipated that there will be no significant air quality problem in Banstead during the plan period, Policies CS 16, 17 and 18 make provision for improving provision for cycling, walking, public transport, car parking and other measures to address congestion. The AAP will address this issue further.
10. To reduce noise pollution.	0	0	0	Redevelopment provides an opportunity to improve the performance of Banstead in this respect. The issue can be addressed in a Design Guidance SPD.
11. To reduce light pollution.	0	0	0	

12. To maintain and improve the water quality of the region's rivers and groundwater	+	+	+	Redevelopment provides an opportunity for the application of SUDS in Banstead.
13. To conserve and enhance biodiversity within the plan area	+	+	+	Redevelopment provides an opportunity for the improvement of biodiversity in Banstead. This links to the provision of open space.
14. To protect and enhance the natural, archaeological, historic environments and cultural assets	?	?	?	Policy CS2 supplemented by the Borough Wide Character Assessment provides the basis for the identification and protection of existing assets. Design Guidance will need to address heritage.
15. To reduce road congestion and the need to travel	+	+	+	Policies CS 16, 17 and 18 make provision for improving provision for cycling, walking, public transport, car parking and other measures to address congestion. The AAP will address this issue further.
16. To reduce greenhouse gases	+	+	+	Policy CS16, Policy CS17 and Policy CS18 seek to ensure that high density development does not compromise the ability to address congestion and reducing the need to travel and, consequently, the potential to increase greenhouse gas emissions. See also SAO5, 12, 17, 21, 22 and 23.
17. To ensure that the District is prepared for the impacts of climate change	+	+	+	Regeneration provides an opportunity to improve the performance of commercial buildings and accessibility to services in the context of climate change. Policies CS9, 10 and 11 set the context and this can be addressed fully in the detail of the Site Allocations DPD and Area Action Plans.
18. Provide for employment opportunities	+	+	+	Two employment sites identified in Banstead with potential for redevelopment to meet current needs. Other sites would come forward on an ad hoc basis and be judged on their merits at that time.
19. Make land available to meet the needs of the economy	+	+	+	The ELR indicates that land for commercial development can be met in existing urban areas.
20. Support economic growth which is inclusive, innovative and sustainable	+	+	+	Regeneration provides an opportunity to improve the quality of commercial buildings. Policies CS9, 10 and 11 set the context and this can be addressed fully in the detail of the Site Allocations DPD, Area Action Plans and Design Guidance SPD.
21. To achieve sustainable production and use of resources	+	+	+	

22. To increase energy efficiency of new and existing development.	+	+	+	
23. To increase the production and use of renewable energy.	+	+	+	High density mixed use provides a major opportunity to improve the capacity of renewable energy. This can be addressed fully in the detail of the Site Allocations DPD and Area Action Plans.

Summary: Supplemented by Policy CS13, Policy CS15 and the Planning Contributions and Infrastructure SPD, development in Banstead will make a substantial contribution to provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford. The provision of housing, employment and retail in the most accessible part of the Borough supports this objective. The Site Allocations DPD and Area Action Plans can provide further provisions with respect to health, well being and social inclusion objectives.

The provision of housing, employment and retail in the most accessible part of the Borough supports this objective. Whilst it is anticipated that there will be no significant air quality problem in Banstead during the plan period, Policies CS 16, 17 and 18 make provision for improving provision for cycling, walking, public transport, car parking and other measures to address congestion. The Banstead AAP will address this issue further.

Redevelopment provides an opportunity to improve the performance of Banstead in terms of noise and light pollution, biodiversity, open space, the water environment and heritage. Policies CS9, 10 and 11 set the context and issues can be further addressed in a Design Guidance SPD. The Borough Wide Character Assessment provides the basis for the Banstead AAP to identify and protect existing assets.

Audit trail: See appraisal matrix for Policy CS4.

CS6: Redhill (Area 2, Wealden Greensand Ridge)				
SA Objective	Assessment			*Comments\Proposed Mitigation*
	Short Term	Medium Term	Long Term	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	+	+	+	Supplemented by Policy CS13, Policy CS15 and the Planning Contributions SPD, development in Redhill will make a substantial contribution to this objective.
2. To facilitate the improved health and wellbeing of the whole population.	+	+	+	The provision of housing, employment and retail in the most accessible part of the Borough supports this objective. The Site Allocations DPD and Area Action Plans can provide further provisions with respect to health and well being objectives.
3. To reduce poverty and social exclusion.	+	+	+	The provision of housing, employment and retail in the most accessible part of the Borough supports this objective. The Site Allocations DPD and Area Action Plans can provide further provisions with respect to social inclusion.
4. To create and maintain safer and more secure communities.	0	0	0	Policy CS6 does not guarantee safe communities. This can be addressed in Area Action Plans and a Design Guidance SPD.

5. To minimise the harm from flooding.	?	?	?	The Site Allocations DPD and Area Action Plan for Redhill will need to address flood risk.
6. To improve accessibility to all services and facilities.	+	+	+	The provision of housing, employment and retail in the most accessible part of the Borough supports this objective. The Site Allocations DPD and Area Action Plans can provide further provisions with respect to improving provision for cycling, walking, public transport, car parking and other measures to address congestion. Policies CS 16, 17 and 18 set the context.
7. To make the best use of previously developed land and existing buildings.	+	+	+	Policy CS6 seeks to ensure that the Surrey Structure Plan's overall target of 80% new development on pdl can be met.
8. To reduce land contamination and safeguard soil quality and quantity.	+	+	+	Policy CS6 supports the objective of remediation of contaminated land. The provisions of the Planning Obligations SPD supplement this by setting out the context for abnormal costs.
9. To ensure air quality continues to improve.	+	+	+	Whilst it is anticipated that there will be no significant air quality problem in Redhill during the plan period, Policies CS 16, 17 and 18 make provision for improving provision for cycling, walking, public transport, car parking and other measures to address congestion. The Redhill AAP will address this issue further.
10. To reduce noise pollution.	0	0	0	Redevelopment provides an opportunity to improve the performance of Redhill in this respect. The issue can be addressed in a Design Guidance SPD.
11. To reduce light pollution.	0	0	0	
12. To maintain and improve the water quality of the region's rivers and groundwater	+	+	+	Redevelopment provides an opportunity for the application of SUDS in Redhill.
13. To conserve and enhance biodiversity within the plan area	+	+	+	Redevelopment provides an opportunity for the improvement of biodiversity in Redhill. This links to the provision of open space.
14. To protect and enhance the natural, archaeological, historic environments and cultural assets	?	?	?	The Borough Wide Character Assessment provides the basis for the Redhill AAP to identify and protect existing assets.

15. To reduce road congestion and the need to travel	+	+	+	Policies CS 16, 17 and 18 make provision for improving provision for cycling, walking, public transport, car parking and other measures to address congestion. The Redhill AAP will address this issue further.
16. To reduce greenhouse gases	+	+	+	Policy CS16, Policy CS17 and Policy CS18 seek to ensure that high density development does not compromise the ability to address congestion and reducing the need to travel and, consequently, the potential to increase greenhouse gas emissions. See also SAO5, 12, 17, 21, 22 and 23.
17. To ensure that the District is prepared for the impacts of climate change	+	+	+	Regeneration provides an opportunity to improve the performance of commercial buildings and accessibility to services in the context of climate change. Policies CS9, 10 and 11 set the context and this can be addressed fully in the detail of the Site Allocations DPD and Area Action Plans.
18. Provide for employment opportunities	+	+	+	The locational strategy has been informed by accessibility mapping. This addresses the concern raised in the appraisal of Policy CS3 to an extent.
19. Make land available to meet the needs of the economy	+	+	+	The ELR indicates that land for commercial development can be met in existing urban areas.
20. Support economic growth which is inclusive, innovative and sustainable	+	+	+	Regeneration provides an opportunity to improve the quality of commercial buildings. Policies CS9, 10 and 11 set the context and this can be addressed fully in the detail of the Site Allocations DPD, Area Action Plans and Design Guidance SPD.
21. To achieve sustainable production and use of resources	+	+	+	
22. To increase energy efficiency of new and existing development.	+	+	+	
23. To increase the production and use of renewable energy.	+	+	+	High density mixed use provides a major opportunity to improve the capacity of renewable energy. This can be addressed fully in the detail of the Site Allocations DPD and Area Action Plans.

Summary: Supplemented by Policy CS13, Policy CS15 and the Planning Contributions and Infrastructure SPD, development in Redhill will make a substantial contribution to provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford. The provision of housing, employment and retail in the most accessible part of the Borough supports this objective. The Site Allocations DPD and Area Action Plans can provide further provisions with respect to health, well being and social inclusion objectives. The Site Allocations DPD and Area Action Plan for Redhill will also need to address flood risk.

The provision of housing, employment and retail in the most accessible part of the Borough supports this objective. Whilst it is anticipated that there will be no significant air quality problem in Redhill during the plan period, Policies CS 16, 17 and 18 make provision for improving provision for cycling, walking, public transport, car parking and other measures to address congestion. The Redhill AAP will address this issue further.

Redevelopment provides an opportunity to improve the performance of Redhill in terms of noise and light pollution, biodiversity, open space, the water environment and heritage. Policies CS9, 10 and 11 set the context and issues can be further addressed in a Design Guidance SPD. The Borough Wide Character Assessment provides the basis for the Redhill AAP to identify and protect existing assets.

Audit trail: See appraisal matrix for Policy CS4.

CS6: Reigate (Area 2, Wealden Greensand Ridge)				
SA Objective	**Assessment**			*Comments\Proposed Mitigation*
	Short Term	Medium Term	Long Term	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	+	+	+	Supplemented by Policy CS13, Policy CS15 and the Planning Contributions SPD, development in Reigate will make a substantial contribution to this objective.
2. To facilitate the improved health and wellbeing of the whole population.	+	+	+	The provision of housing, employment and retail in a highly accessible part of the Borough supports this objective. The Site Allocations DPD and Area Action Plans can make further provisions with respect to health and well being objectives.
3. To reduce poverty and social exclusion.	+	+	+	The provision of housing, employment and retail in the most accessible part of the Borough supports this objective. The Site Allocations DPD and Area Action Plans can provide further provisions with respect to social inclusion.
4. To create and maintain safer and more secure communities.	0	0	0	Policy CS6 does not guarantee safe communities. This can be addressed in Area Action Plans and a Design Guidance SPD.
5. To minimise the harm from flooding.	0	0	0	There is no significant flood risk. The issue can be addressed by standard design measures.

Objective				Commentary
6. To improve accessibility to all services and facilities.	+	+	+	The provision of housing and employment in a highly accessible part of the Borough supports this objective. The Site Allocations DPD and Area Action Plans can provide further provisions with respect to improving provision for cycling, walking, public transport, car parking and other measures to address congestion. Policies CS 16, 17 and 18 set the context.
7. To make the best use of previously developed land and existing buildings.	+	+	+	Policy CS6 seeks to ensure that the Surrey Structure Plan's overall target of 80% new development on pdl can be met.
8. To reduce land contamination and safeguard soil quality and quantity.	+	+	+	Policy CS6 supports the objective of remediation of contaminated land. The provisions of the Planning Obligations SPD supplement this by setting out the context for abnormal costs.
9. To ensure air quality continues to improve.	?	?	?	Policies CS 16, 17 and 18 make provision for improving provision for cycling, walking, public transport, car parking and other measures to address congestion. The Site Allocations DPD will need to address concern that part of Reigate High Street has poor air quality.
10. To reduce noise pollution.	0	0	0	Redevelopment provides an opportunity to improve the performance of Reigate in this respect. The issue can be addressed in a Design Guidance SPD.
11. To reduce light pollution.	0	0	0	
12. To maintain and improve the water quality of the region's rivers and groundwater	+	+	+	Redevelopment provides an opportunity for the application of SUDS in Reigate.
13. To conserve and enhance biodiversity within the plan area	+	+	+	Redevelopment provides an opportunity for the improvement of biodiversity in Reigate. This links to the provision of open space.
14. To protect and enhance the natural, archaeological, historic environments and cultural assets	?	?	?	Policy CS2 supplemented by the Borough Wide Character Assessment provides the basis for the identification and protection of existing assets. Design Guidance will need to address heritage.
15. To reduce road congestion and the need to travel	+	+	+	Policies CS 16, 17 and 18 make provision for improving provision for cycling, walking, public transport, car parking and other measures to address congestion.

16. To reduce greenhouse gases	+	+	+	Policy CS16, Policy CS17 and Policy CS18 seek to ensure that high density development does not compromise the ability to address congestion and reducing the need to travel and, consequently, the potential to increase greenhouse gas emissions. See also SAO5, 12, 17, 21, 22 and 23.
17. To ensure that the District is prepared for the impacts of climate change	+	+	+	Regeneration provides an opportunity to improve the performance of commercial buildings and accessibility to services in the context of climate change. Policies CS9, 10 and 11 set the context and this can be addressed fully in the detail of the Site Allocations DPD and Design Guidance.
18. Provide for employment opportunities	+	+	+	The locational strategy has been informed by accessibility mapping. This addresses the concern raised in the appraisal of Policy CS3 to an extent.
19. Make land available to meet the needs of the economy	+	+	+	The ELR indicates that land for commercial development can be met in existing urban areas.
20. Support economic growth which is inclusive, innovative and sustainable	+	+	+	Regeneration provides an opportunity to improve the quality of commercial buildings. Policies CS9, 10 and 11 set the context and this can be addressed fully in the detail of the Site Allocations DPD, Area Action Plans and Design Guidance SPD.
21. To achieve sustainable production and use of resources	+	+	+	
22. To increase energy efficiency of new and existing development.	+	+	+	
23. To increase the production and use of renewable energy.	+	+	+	High density mixed use provides a major opportunity to improve the capacity of renewable energy. This can be addressed fully in the detail of the Site Allocations DPD and Area Action Plans.

Summary: Supplemented by Policy CS13, Policy CS15 and the Planning Contributions and Infrastructure SPD, development in Reigate will make a substantial contribution to provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford. The provision of housing and employment in a highly accessible part of the Borough supports this objective. The Site Allocations DPD and Area Action Plans can make further provisions with respect to health, well being and social inclusion objectives.

Policies CS 16, 17 and 18 make provision for improving provision for cycling, walking, public transport, car parking and other measures to address congestion. The Site Allocations DPD will need to address concern that part of Reigate High Street has poor air quality.

In addition, these policies make provision for enhancement of the natural, archaeological, historic environments and cultural assets and for reducing noise and light pollution in new development. Policies CS9, 10 and 11 set the context and issues can be further addressed in a Design Guidance SPD. The Borough Wide Character Assessment provides the basis for the Redhill AAP to identify and protect existing assets.

Audit trail: See appraisal matrix for Policy CS4.

CS6: Horley (Area 3 – Low Weald)				
SA Objective	**Assessment**			
	Short Term	Medium Term	Long Term	*Comments\Proposed Mitigation*
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	+	+	+	Supplemented by Policy CS13, Policy CS15 and the Planning Contributions SPD, development in Horley will make a substantial contribution to this objective.
2. To facilitate the improved health and wellbeing of the whole population.	+	+	+	The provision of housing, employment and retail in retail in the most accessible part of the Borough supports this objective. The Site Allocations DPD and Area Action Plans can make further provisions with respect to health and well being objectives.
3. To reduce poverty and social exclusion.	+	+	+	The provision of housing, employment and retail in the most accessible part of the north of the Borough supports this objective. The Site Allocations DPD and Area Action Plans can provide further provisions with respect to social inclusion.
4. To create and maintain safer and more secure communities.	0	0	0	Policy CS6 does not guarantee safe communities. This can be addressed in Area Action Plans and a Design Guidance SPD.
5. To minimise the harm from flooding.	0	0	0	There is no significant flood risk. The issue can be addressed by standard design measures.

6. To improve accessibility to all services and facilities.	+	+	+	The provision of housing and employment in retail in the most accessible part of the north of the Borough supports this objective. The Site Allocations DPD and Area Action Plans can provide further provisions with respect to improving provision for cycling, walking, public transport, car parking and other measures to address congestion. Policies CS 16, 17 and 18 set the context.
7. To make the best use of previously developed land and existing buildings.	+	+	+	Policy CS6 seeks to ensure that the Surrey Structure Plan's overall target of 80% new development on pdl can be met.
8. To reduce land contamination and safeguard soil quality and quantity.	+	+	+	Policy CS6 supports the objective of remediation of contaminated land. The provisions of the Planning Obligations SPD supplement this by setting out the context for abnormal costs.
9. To ensure air quality continues to improve.	?	?	?	Policies CS 16, 17 and 18 make provision for improving provision for cycling, walking, public transport, car parking and other measures to address congestion.
10. To reduce noise pollution.	0	0	0	Redevelopment provides an opportunity to improve the performance of Banstead in this respect. The issue can be addressed in a Design Guidance SPD.
11. To reduce light pollution.	0	0	0	Redevelopment provides an opportunity to improve the performance of Banstead in this respect. The issue can be addressed in a Design Guidance SPD.
12. To maintain and improve the water quality of the region's rivers and groundwater	+	+	+	Redevelopment provides an opportunity for the application of SUDS in Banstead.
13. To conserve and enhance biodiversity within the plan area	+	+	+	Redevelopment provides an opportunity for the improvement of biodiversity in Banstead. This links to the provision of open space.
14. To protect and enhance the natural, archaeological, historic environments and cultural assets	?	?	?	Policy CS2 supplemented by the Borough Wide Character Assessment provides the basis for the identification and protection of existing assets. Design Guidance will need to address heritage.
15. To reduce road congestion and the need to travel	+	+	+	Policies CS 16, 17 and 18 make provision for improving provision for cycling, walking, public transport, car parking and other measures to address congestion.

Objective				Commentary
16. To reduce greenhouse gases	+	+	+	Policy CS16, Policy CS17 and Policy CS18 seek to ensure that high density development does not compromise the ability to address congestion and reducing the need to travel and, consequently, the potential to increase greenhouse gas emissions. See also SAO5, 12, 17, 21, 22 and 23.
17. To ensure that the District is prepared for the impacts of climate change	+	+	+	Regeneration provides an opportunity to improve the performance of commercial buildings and accessibility to services in the context of climate change. Policies CS9, 10 and 11 set the context and this can be addressed fully in the detail of the Site Allocations DPD and Design Guidance.
18. Provide for employment opportunities	+	+	+	The locational strategy has been informed by accessibility mapping. This addresses the concern raised in the appraisal of Policy CS3 to an extent.
19. Make land available to meet the needs of the economy	+	+	+	The ELR indicates that land for commercial development can be met in existing urban areas.
20. Support economic growth which is inclusive, innovative and sustainable	+	+	+	Regeneration provides an opportunity to improve the quality of commercial buildings. Policies CS9, 10 and 11 set the context and this can be addressed fully in the detail of the Site Allocations DPD, Area Action Plans and Design Guidance SPD.
21. To achieve sustainable production and use of resources	+	+	+	
22. To increase energy efficiency of new and existing development.	+	+	+	
23. To increase the production and use of renewable energy.	+	+	+	High density mixed use provides a major opportunity to improve the capacity of renewable energy. This can be addressed fully in the detail of the Site Allocations DPD and Area Action Plans.

Summary: Supplemented by Policy CS13, Policy CS15 and the Planning Contributions and Infrastructure SPD, development in Horley will make a substantial contribution to provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford. The provision of housing and employment in a highly accessible part of the Borough supports this objective. The Site Allocations DPD and Area Action Plans can make further provisions with respect to health, well being and social inclusion objectives.

Policies CS 16, 17 and 18 make provision for improving provision for cycling, walking, public transport, car parking and other measures to address congestion. Air quality is predicted to continue to be poor because of emissions related to Gatwick Airport and the Site Allocations DPD and Horley AAP will need to address this concern.

In addition, these policies make provision for enhancement of the natural, archaeological, historic environments and cultural assets and for reducing noise and light pollution in new development. Policies CS9, 10 and 11 set the context and issues can be further addressed in a Design Guidance SPD. The Borough Wide Character Assessment provides the basis for the Horley AAP to identify and protect existing assets.

Audit trail: See appraisal matrix for Policy CS4.

CS7: Town Centres				
SA Objective	**Assessment**			***Comments\Proposed Mitigation***
	Short Term	Medium Term	Long Term	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.				See summary
2. To facilitate the improved health and wellbeing of the whole population.				
3. To reduce poverty and social exclusion.				
4. To create and maintain safer and more secure communities.				
5. To minimise the harm from flooding.				
6. To improve accessibility to all services and facilities.				
7. To make the best use of previously developed land and existing buildings.				
8. To reduce land contamination and safeguard soil quality and quantity.				
9. To ensure air quality continues to improve.				
10. To reduce noise pollution.				
11. To reduce light pollution.				
12. To maintain and improve the water quality of the region's rivers and groundwater				

13. To conserve and enhance biodiversity within the plan area				
14. To protect and enhance the natural, archaeological, historic environments and cultural assets				
15. To reduce road congestion and the need to travel				
16. To reduce greenhouse gases				
17. To ensure that the District is prepared for the impacts of climate change				
18. Provide for employment opportunities				
19. Make land available to meet the needs of the economy				
20. Support economic growth which is inclusive, innovative and sustainable				
21. To achieve sustainable production and use of resources				
22. To increase energy efficiency of new and existing development.				
23. To increase the production and use of renewable energy.				

Summary: This Policy supplements and consolidates Policy CS4 and CS6 in that it clarifies the importance of retaining and enhancing facilities and services where they are most accessible by a variety of modes of transport. It is considered that further appraisal at this strategic level is unnecessary.

Audit trail: See appraisal matrix for Policy CS4.

CS8: Gatwick Airport				
SA Objective	**Assessment**			
	Short Term	Medium Term	Long Term	***Comments\Proposed Mitigation***
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	0	0	0	Housing would not be appropriate development.
2. To facilitate the improved health and wellbeing of the whole population.	?	?	?	Whilst employment opportunities support health and well being, the AQMA represents a risk. The Gatwick Airport Master Plan must address this as a priority.
3. To reduce poverty and social exclusion.	+	+	+	The objectives of sustainable economic growth would include social inclusion.
4. To create and maintain safer and more secure communities.	0	0	0	Policy CS6 does not guarantee safe communities. This can be addressed in the Gatwick Airport Masterplan.
5. To minimise the harm from flooding.	?	?	?	The Gatwick Airport Masterplan will need to address potential adverse impact in the Mole catchment.
6. To improve accessibility to all services and facilities.	+	+	+	Accessibility to new services and facilities in the Gatwick area is good.
7. To make the best use of previously developed land and existing buildings.	+	+	+	Redevelopment at Gatwick airport supports this objective. Land required in the Borough to support economic growth would be pdl in Horley.
8. To reduce land contamination and safeguard soil quality and quantity.	+	+	+	Redevelopment at Gatwick airport supports this objective.
9. To ensure air quality continues to improve.	?	?	?	The Gatwick Airport Master Plan must address this as a priority.
10. To reduce noise pollution.	?	?	?	The Gatwick Airport Masterplan should address the need to reduce noise pollution
11. To reduce light pollution.	?	?	?	The Gatwick Airport Masterplan should address the need to reduce noise pollution
12. To maintain and improve the water quality of the region's rivers and groundwater	?	?	?	The Gatwick Airport Master Plan must address pollution associated with run off this as a priority could affect biodiversity within the mole catchment … + SAC?
13. To conserve and enhance biodiversity within the plan area	?	?	?	The Gatwick Airport Master Plan must address air pollution as a priority. The outcome of Appropriate Assessment will inform mitigation measures.

14. To protect and enhance the natural, archaeological, historic environments and cultural assets	0	0	0	Development within the Borough to support growth in the Gatwick area would be the subject of the criteria in Policy CS2 and Policy CS6. Redevelopment offers an opportunity for improvement, but this would be subject to the detail of the Site Allocations DPD, the Horley AAP and Design Guidance SPD.
15. To reduce road congestion and the need to travel	?	?	?	The Gatwick Airport Masterplan should address the traffic implications for the Borough.
16. To reduce greenhouse gases	0	0	0	Whilst a major issue to be addressed, emissions other than traffic generated would be outside the Borough. The comment in SAO15 is relevant to the context of the appraisal.
17. To ensure that the District is prepared for the impacts of climate change	0	0	0	Whilst a major issue to be addressed, emissions other than traffic generated would be outside the Borough. The comment in SAO15 is relevant to the context of the appraisal.
18. Provide for employment opportunities	+	+	+	Significant employment opportunities would continue to be provided at Gatwick. The impact on labour supply for companies based in the Borough should be addressed, however. Part 2 of Policy CS3 seeks to address this.
19. Make land available to meet the needs of the economy	+	+	+	The site is outside the Borough but supports meeting the demand for the needs of the local economy.
20. Support economic growth which is inclusive, innovative and sustainable	+	+	+	The policy seeks to deliver sustainable economic growth.
21. To achieve sustainable production and use of resources	0	0	0	Whilst a major issue to be addressed, the site lies outside the Borough
22. To increase energy efficiency of new and existing development.	0	0	0	Whilst a major issue to be addressed, the site lies outside the Borough
23. To increase the production and use of renewable energy.	+	+	+	Whilst the site lies outside the Borough, the substantial demand for energy may support opportunities for renewable energy capacity in the Borough.

Summary: Appraisal at the Issues and Options stage (2005) and the previous PO stage (May 2006) identified concerns for either an approach of maintaining an objection to a second runway as well as one of supporting it. The SE Plan requires RBBC to support growth in the Gatwick Diamond and this would be achieved predominantly through the provision of housing and employment in Horley. A more positive approach has, therefore, emerged which seeks to support sustainable economic growth at Gatwick. Significant employment opportunities would continue to be provided at Gatwick. Whilst this is largely beneficial, the impact on labour supply for companies based in the Borough should be addressed and it is noted that Part 2 of Policy CS3 seeks to do so.

Whilst it is recognised that Gatwick Airport lies outside the administrative area of Reigate and Banstead Borough Council, appraisal has identified that there could be adverse impacts within the Borough and that there is uncertainty concerning how significant these might be. The Council should seek to ensure the Gatwick Airport Masterplan addresses social inclusion and safe communities; the risk to human health represented by the AQMA, the impact on the Rover Mole catchment from polluted run off and potentially increased flood risk, noise and light pollution; the impact on highways. Further concerns include the potential adverse affect on biodiversity resulting from air pollution. The outcome of Appropriate Assessment will inform mitigation measures. Whilst a major issue to be addressed, emissions other than traffic generated would be outside the Borough.

A potentially significant benefit is that the substantial demand for energy may support opportunities for renewable energy capacity in the Borough.

Audit trail: Appraisal of E5 (Issues and Options 2005) considers two approaches with respect to Gatwick Airport: E5a, 'maintain opposition to a second runway' and E5b, 'not opposing a second runway'. E5a was considered to have more positively sustainability attributes. It is noted, however, that without an additional runway the existing airport will continue to attract an increasing number of passengers annually. This would be likely to result in a continuation of environmental problems into the foreseeable future. In particular, traffic congestion and poor air quality in some parts of Horley. Conversely, resisting a further runway could encourage more effective use of the facility.

It was not considered to be of any additional value to appraise Redhill Aerodrome separately since the site lies in the Green Belt and significant intensification of development would not be appropriate. Planning applications are lodged in tandem with Tandridge DC and reference should be made to the Tandridge Core Strategy for comparable policy approach

The approach of opposing a second runway was proposed as Option 15, 'aviation' (PO May 2006) with a strategy of seeking to minimise the environmental impact of the existing runway and opposing intensification Redhill Aerodrome.

CS9:   Sustainable Development

SA Objective	Assessment			Comments\Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	0	0	0	Policy CS9 supports the delivery of good quality homes. Whilst it is predicted that the design and layout requirements are not likely to compromise the ability to deliver sufficient quantity of homes, the position should be monitored.
2. To facilitate the improved health and wellbeing of the whole population.	+	+	+	The Policy sets the context for adopting appropriate densities in different parts of the Borough through the Site Allocations DPD and Area Action Plans. This issue can also be addressed in a Design Guidance SPD.
3. To reduce poverty and social exclusion.	+	+	+	The policy supports effective services and transport options.

4. To create and maintain safer and more secure communities.	0	0	0	Policy CS9 supports this objective, but delivery can only be secured through specific design criteria in the Site Allocations DPD, Area Action Plans and the Design Guidance SPD.
5. To minimise the harm from flooding.	+	+	+	The objective is supported by Policy CS9, Policy CS10 and Policy CS11 working in combination.
6. To improve accessibility to all services and facilities.	+	+	+	The policy supports effective services and transport options.
7. To make the best use of previously developed land and existing buildings.	+	+	+	Policy CS9 supports this objective.
8. To reduce land contamination and safeguard soil quality and quantity.	+	+	+	Policy CS9 supports this objective. Addressing the issue of abnormal costs would give greater clarity.
9. To ensure air quality continues to improve.	+	+	+	Supports reducing the need to travel, public transport provision, walking and cycling
10. To reduce noise pollution.	0	0	0	This objective would not be appropriate to include in Policy CS9 and would, in any case, be addressed by detailed design requirements that meet the provisions of PPS23.
11. To reduce light pollution.	0	0	0	This objective would not be appropriate to include in Policy CS9 and would, in any case, addressed by detailed design requirements that meet the provisions of the ILE guidance.
12. To maintain and improve the water quality of the region's rivers and groundwater	+	+	+	The objective is supported by Policy CS9, Policy CS10 and Policy CS11 working in combination.
13. To conserve and enhance biodiversity within the plan area	+	+	+	The objective is supported by Policy CS9, Policy CS10 and Policy CS11 working in combination.
14. To protect and enhance the natural, archaeological, historic environments and cultural assets	+	+	+	Policy CS9 supports this objective.
15. To reduce road congestion and the need to travel	+	+	+	Supports reducing the need to travel, public transport provision, walking and cycling
16. To reduce greenhouse gases	+	+	+	The objective is supported by Policy CS9, Policy CS10, Policy CS11, Policy CS16, Policy CS17 and Policy CS18 working in combination.

17. To ensure that the District is prepared for the impacts of climate change	+	+	+	Policy CS9 supports this objective.
18. Provide for employment opportunities	0	0	0	The Policy has no bearing on employment.
19. Make land available to meet the needs of the economy	0	0	0	Policy CS9 supports the delivery of good quality mixed use development by encouraging measures to reduce the need to travel. Whilst it is predicted that the design and layout requirements are not likely to compromise the ability to deliver sufficient quantity of land, the position should be monitored.
20. Support economic growth which is inclusive, innovative and sustainable	+	+	+	Policy CS9 supports this objective.
21. To achieve sustainable production and use of resources	+	+	+	Policy CS9 supports this objective.
22. To increase energy efficiency of new and existing development.	+	+	+	Policy CS9 supports this objective.
23. To increase the production and use of renewable energy.	+	+	+	Policy CS9 supports this objective.

Summary: Policy CS9 provides the balance to the requirement for high density development to ensure the potential adverse impacts on traffic congestion, health, heritage, biodiversity and pollution as well as climate change are all addressed. Sustainability Self-Assessment Guidance will further support delivery. It is noted from the appraisal of Policy CS1 that further work may be necessary to ensure climate change measures can be delivered in areas where there are restrictive policies. This can be informed by the Borough Wide Character Assessment.

Policy CS9 also supports the delivery of good quality homes and mixed use developments. Whilst it is predicted that the design and layout requirements are not likely to compromise the ability to deliver sufficient quantity of homes and commercial land the position should be monitored. It may be appropriate to include a reference to clarify the parameters and priorities where abnormal costs of development may arise.

The Policy sets the context for adopting appropriate densities in different parts of the Borough through the Site Allocations DPD and Area Action Plans. This issue can also be addressed in a Design Guidance SPD.

Audit trail: Option 2 (PO May 2006) proposed the inclusion of policies and criteria against which all proposals would be assessed. Previous appraisal (Issues and Options 2005) of Options D1a 'environmentally responsible design and construction', D2a, 'on site renewable technology' and D3a 'renewable energy infrastructure' identified the importance of such a policy in protecting the environment, reducing the use of resources and alleviating fuel poverty and pressure on water supply.

CS10: Infrastructure Delivery				
SA Objective	**Assessment**			*Comments\Proposed Mitigation*
	Short Term	Medium Term	Long Term	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	0	0	0	Policy CS10 seeks to ensure that the necessary infrastructure is in place to support the delivery of good quality homes. Whilst it is predicted that the requirements are not likely to compromise the ability to deliver sufficient quantity of homes, the position should be monitored.
2. To facilitate the improved health and wellbeing of the whole population.	+	+	+	The emphasis on green infrastructure, open space and leisure/recreation facilities strongly supports this objective.
3. To reduce poverty and social exclusion.	+	+	+	Policy CS10 supports the objective. The emphasis on community facilities would deliver significant benefits.
4. To create and maintain safer and more secure communities.	+	+	+	Whilst it would be detailed design measures that ensure delivery, a strategy of encouraging mixed development and community facilities provides a strong basis for safe communities.
5. To minimise the harm from flooding.	+	+	+	Open space and green infrastructure are key measures to help reduce flood risk. The detail can be provided in the Green Infrastructure Strategy.
6. To improve accessibility to all services and facilities.	+	+	+	Policy CS10 will work in combination with the locational strategy and Policies CS 16, 17 and 18 to improve accessibility.
7. To make the best use of previously developed land and existing buildings.	+	+	+	Policy CS10 supports the use of pdl. There may be a need to address any difficulties posed by abnormal costs in subsequent DPDs and SPDs.
8. To reduce land contamination and safeguard soil quality and quantity.	?	?	?	The comments in SAO7, above, are relevant. Abnormal costs are more likely to exist where there is contamination.
9. To ensure air quality continues to improve.	+	+	+	Policy CS10 will work in combination with the locational strategy and Policies CS 16, 17 and 18 to improve accessibility by public transport, walking and cycling. The Green Infrastructure Strategy could investigate ways of addressing air quality problems.
10. To reduce noise pollution.	+	+	+	The Green Infrastructure Strategy could investigate ways of addressing noise pollution.
11. To reduce light pollution.	+	+	+	The Green Infrastructure Strategy could investigate ways of addressing light pollution.

12. To maintain and improve the water quality of the region's rivers and groundwater	+	+	+	The Green Infrastructure Strategy can build on the context set by Policy CS9 and Policy CS11 to maximise the benefits to water quality.
13. To conserve and enhance biodiversity within the plan area	+	+	+	The Green Infrastructure Strategy can build on the context set by Policy CS9 and Policy CS11 to maximise the benefits to biodiversity.
14. To protect and enhance the natural, archaeological, historic environments and cultural assets	+	+	+	In combination with Policy CS2, Policy CS10 supports the creation of appropriate settings for heritage and cultural assets.
15. To reduce road congestion and the need to travel	+	+	+	Policy CS10 will work in combination with the locational strategy and Policies CS 16, 17 and 18 to improve accessibility by public transport, walking and cycling, helping to address concern that high density development could contribute to congestion.
16. To reduce greenhouse gases	+	+	+	Policy CS10 will work in combination with the locational strategy and Policies CS 16, 17 and 18 to improve accessibility by public transport, walking and cycling. The Green Infrastructure Strategy could include increasing renewable energy capacity.
17. To ensure that the District is prepared for the impacts of climate change	+	+	+	Addressing the causes and consequences of climate change will be central to the Green Infrastructure Strategy.
18. Provide for employment opportunities	0	0	0	Policy CS10 supports the objective but does not directly deliver employment.
19. Make land available to meet the needs of the economy	0	0	0	Policy CS10 seeks to ensure that the necessary infrastructure is in place to support commercial development. Whilst it is predicted that the requirements are not likely to compromise this, the position should be monitored.
20. Support economic growth which is inclusive, innovative and sustainable	+	+	+	A pleasant environment and the objectives of Green Infrastructure support sustainable economic growth.
21. To achieve sustainable production and use of resources	+	+	+	Policy CS 10 supports these objectives in combination with Policy CS9 and Policy CS11.

SA Objective	Short Term	Medium Term	Long Term	Comments\Proposed Mitigation
22. To increase energy efficiency of new and existing development.	+	+	+	
23. To increase the production and use of renewable energy.	+	+	+	

Summary: Policy CS10 seeks to ensure that the necessary infrastructure is in place to support the delivery of good quality homes and sustainable economic development. Whilst it would be detailed design measures that ensure delivery, a strategy of encouraging mixed development and community facilities provides a strong basis for safe and inclusive communities.

Policy CS10 will work in combination with the locational strategy and Policies CS 16, 17 and 18 to improve accessibility by public transport, walking and cycling, helping to address concern that high density development could contribute to congestion. The Green Infrastructure Strategy could investigate ways of addressing air quality problems; noise and light pollution; maximising the use of SUDS and green roofs. Addressing the causes and consequences of climate change and improving urban biodiversity will be central to the Green Infrastructure Strategy.

It is predicted that the requirements for contributions are not likely to compromise the achievement of other objectives, although the position should be monitored. In addition, when developing the approach to tariffs consideration should be given to the impact of abnormal costs.

Audit trail: Option 3b (PO May 2006) sought to ensure that an overarching strategy is established incorporating local open space standards and requirements for developments to contribute towards the delivery of a comprehensive multi functional Green Infrastructure network. Appraisal of the spatial location of development (Preferred Option 1) identified the importance of quality of urban open space, the public realm and green infrastructure to balance a policy of high density housing. Appraisal of Option 5 (PO May 2006) emphasises the particular importance of the role of improving flood risk infrastructure, with particular reference to Redhill and Horley. This issue is addressed by Policy CS9, CS10 and CS11 and can be considered further in subsequent DPDs and SPDs. Appraisal of Option 10 (Community Facilities and Infrastructure) identified benefits with respect to the range, quality and accessibility of community and leisure facilities in the Borough and that he appropriate mix would be informed by a Retail and Leisure Study.

Appraisal of Options C1, C2, C3, D1, D2 and D3 (Issues and options 2005) identified positive impacts in relation to environmental capital and considered that a green infrastructure policy would provide the clarity and criteria to help maximise benefits such as incorporating renewable energy technologies into the urban environment and making best use of open space.

CS11: Sustainable Construction				
SA Objective	**Assessment**			
	Short Term	Medium Term	Long Term	*Comments\Proposed Mitigation*
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	0	0	0	Policy CS11 supports the delivery of good quality homes. Whilst it is predicted that the design and layout requirements are not likely to compromise the ability to deliver sufficient quantity of homes, the position should be monitored.
2. To facilitate the improved health and wellbeing of the whole population.	+	+	+	The Code for Sustainable Homes includes criteria to ensure healthier homes.

3. To reduce poverty and social exclusion.	+	+	+	Implementation of the Code for Sustainable Homes will reduce fuel poverty.
4. To create and maintain safer and more secure communities.	0	0	0	Policy CS11 supports this objective, but delivery can only be secured through specific design criteria in the Site Allocations DPD, Area Action Plans and the Design Guidance SPD.
5. To minimise the harm from flooding.	+	+	+	The objective is supported by Policy CS9, Policy CS10 and Policy CS11 working in combination.
6. To improve accessibility to all services and facilities.	0	0	0	The issue is not relevant in the context of the Code for Sustainable Homes.
7. To make the best use of previously developed land and existing buildings.	+	+	+	Design and construction that makes good use of land scores more highly in the Code and BREEAM.
8. To reduce land contamination and safeguard soil quality and quantity.	?	?	?	Redevelopment of land is likely to become increasingly important if properties built to higher levels of the Code become more sought after. Remediation of contamination would be likely to support a higher rating, although this is not yet clear.
9. To ensure air quality continues to improve.	+	+	+	Properties using less fossil fuel and with good cycling facilities score more highly in the Code and BREEAM.
10. To reduce noise pollution.	+	+	+	Properties with good sound insulation score more highly in the Code and BREEAM.
11. To reduce light pollution.	?	?	?	There is no light pollution measure in the Code.
12. To maintain and improve the water quality of the region's rivers and groundwater	+	+	+	Properties using SUDS score more highly in the Code.
13. To conserve and enhance biodiversity within the plan area	+	+	+	Properties that enhance biodiversity score more highly in the Code.
14. To protect and enhance the natural, archaeological, historic environments and cultural assets	?	?	?	Whilst the Code is consistent with improving the natural environment, the need to use new designs and technologies may not be compatible with some heritage and cultural interests.
15. To reduce road congestion and the need to travel	+	+	+	Properties with good cycling facilities score more highly in the Code and BREEAM.
16. To reduce greenhouse gases	+	+	+	Properties using less fossil fuel and with good cycling facilities score more highly in the Code and BREEAM.

SA Objective	Short Term	Medium Term	Long Term	Comments\Proposed Mitigation
17. To ensure that the District is prepared for the impacts of climate change	+	+	+	Design and construction that addresses the causes and consequences of climate change score more highly in the Code and BREEAM.
18. Provide for employment opportunities	0	0	0	The Policy has no bearing on employment.
19. Make land available to meet the needs of the economy	+	+	+	Design and construction that makes good use of land scores more highly in the Code and BREEAM.
20. Support economic growth which is inclusive, innovative and sustainable	+	+	+	The objective is an integral element of BREEAM
21. To achieve sustainable production and use of resources	+	+	+	Design and construction that makes efficient use of resources scores more highly in the Code and BREEAM.
22. To increase energy efficiency of new and existing development.	+	+	+	Design and construction that makes efficient use of energy scores more highly in the Code and BREEAM.
23. To increase the production and use of renewable energy.	+	+	+	Design and construction that produces and uses renewable energy scores more highly in the Code and BREEAM.

Summary: Policy CS11 supports the delivery of good quality homes that reduce the use of natural resources compared to the existing position and address the causes and consequences of climate change. Whilst it is predicted that the design and layout requirements are not likely to compromise the ability to deliver sufficient quantity of homes and employment land, the position should be monitored. It may be appropriate to include a reference to where in the LDF the issue of abnormal costs of development is/will be addressed. This could clarify parameters and priorities. It is also noted from the appraisal of Policy CS1 that further work may be necessary to ensure climate change measures can be delivered in areas where there are restrictive policies.

Audit trail: Option 2 (PO May 2006) proposed the inclusion of policies and criteria against which all proposals would be assessed. Previous appraisal (Issues and Options 2005) of Options D1a 'environmentally responsible design and construction', D2a, 'on site renewable technology' and D3a 'renewable energy infrastructure' identified the importance of such a policy in protecting the environment, reducing the use of resources and alleviating fuel poverty and pressure on water supply.

CS12: Housing Delivery				
SA Objective	**Assessment**			**Comments\Proposed Mitigation**
	Short Term	Medium Term	Long Term	

1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.				See summary
2. To facilitate the improved health and wellbeing of the whole population.				
3. To reduce poverty and social exclusion.				
4. To create and maintain safer and more secure communities.				
5. To minimise the harm from flooding.				
6. To improve accessibility to all services and facilities.				
7. To make the best use of previously developed land and existing buildings.				
8. To reduce land contamination and safeguard soil quality and quantity.				
9. To ensure air quality continues to improve.				
10. To reduce noise pollution.				
11. To reduce light pollution.				
12. To maintain and improve the water quality of the region's rivers and groundwater				
13. To conserve and enhance biodiversity within the plan area				
14. To protect and enhance the natural, archaeological, historic environments and cultural assets				
15. To reduce road congestion and the need to travel				
16. To reduce greenhouse gases				
17. To ensure that the District is prepared for the impacts of climate change				

SA Objective	Short Term	Medium Term	Long Term	Comments\Proposed Mitigation
18. Provide for employment opportunities				
19. Make land available to meet the needs of the economy				
20. Support economic growth which is inclusive, innovative and sustainable				
21. To achieve sustainable production and use of resources				
22. To increase energy efficiency of new and existing development.				
23. To increase the production and use of renewable energy.				

Summary: Policy CS12 seeks to ensure the delivery of the housing element of Policy CS4. In addition to the comments made in that appraisal matrix, above, it is noted that the SE Plan sets the housing target as a minimum. This is likely to increase speculation about the need for greenfield sites in the longer time. In the short to medium term (to 2016), the NGP status and delivery strategy provides greater certainty that greenfield sites will not be needed during that period. In this respect Policy CS6 clarifies that a review of the Green Belt will be undertaken by 2012.

CS13: Housing Needs of the Community				
SA Objective	**Assessment**			
	Short Term	Medium Term	Long Term	*Comments\Proposed Mitigation*
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	+	+	+	Policy CS13 seeks to ensure the specific housing needs of the Borough are met.
2. To facilitate the improved health and wellbeing of the whole population.	+	+	+	Policy CS13 specifically requires consideration of the need for extra care homes and the Lifetime Homes standard.
3. To reduce poverty and social exclusion.	+	+	+	Policy CS13 specifically requires consideration of the need for extra care homes
4. To create and maintain safer and more secure communities.	+	+	+	Policy CS13 specifically requires consideration of the need for extra care homes
5. To minimise the harm from flooding.	0	0	0	Policy CS13 is not likely to have any significant impact on flood risk.
6. To improve accessibility to all services and facilities.	0	0	0	Policy CS13 is not likely to have any significant impact on accessibility to services.

7. To make the best use of previously developed land and existing buildings.	0	0	0	Policy CS13 is not likely to have any significant impact on the use of pdl.
8. To reduce land contamination and safeguard soil quality and quantity.	0	0	0	Policy CS13 is not likely to have any significant impact on contamination or soil quality.
9. To ensure air quality continues to improve.	0	0	0	Policy CS13 is not likely to have any significant impact on flood risk.
10. To reduce noise pollution.	0	0	0	Policy CS13 is not likely to have any significant impact on noise pollution.
11. To reduce light pollution.	0	0	0	Policy CS13 is not likely to have any significant impact on light pollution.
12. To maintain and improve the water quality of the region's rivers and groundwater	0	0	0	Policy CS13 is not likely to have any significant impact on water quality.
13. To conserve and enhance biodiversity within the plan area	0	0	0	Policy CS13 is not likely to have any significant impact on biodiversity.
14. To protect and enhance the natural, archaeological, historic environments and cultural assets	0	0	0	Policy CS13 is not likely to have any significant impact on heritage and cultural assets.
15. To reduce road congestion and the need to travel	0	0	0	Policy CS13 is not likely to have any significant impact on congestion.
16. To reduce greenhouse gases	0	0	0	Policy CS13 is not likely to have any significant impact on the emission fo greenhouse gases.
17. To ensure that the District is prepared for the impacts of climate change	+	+	+	Whilst Policy CS13 supports self sufficiency, it is not likely that there would be any significant impact with respect to climate change.
18. Provide for employment opportunities	0	0	0	Policy CS13 is not likely to have any significant impact on employment.
19. Make land available to meet the needs of the economy	0	0	0	Policy CS13 is not likely to have any significant impact with respect to the availability of employment land.
20. Support economic growth which is inclusive, innovative and sustainable	0	0	0	Policy CS13 is not likely to have any significant impact on sustainable economic growth.

	Short Term	Medium Term	Long Term	Comments\Proposed Mitigation
21. To achieve sustainable production and use of resources	+	+	+	Policy CS13 supports the increased life of a property.
22. To increase energy efficiency of new and existing development.	0	0	0	Policy CS13 is not likely to have any significant impact with respect to energy efficiency.
23. To increase the production and use of renewable energy.	0	0	0	Policy CS13 is not likely to have any significant impact with respect to renewable energy.

Summary: Policy addresses concern that too many 1 and 2 bed properties are being built by reference to identified needs, including those of the elderly and the need for extra care homes.

Audit trail: Appraisal of Option 7 (PO May 2006) raised concern concerning overprovision of 1 and 2 bed properties.

CS14: Gypsies and Travellers				
SA Objective	**Assessment**			
	Short Term	Medium Term	Long Term	*Comments\Proposed Mitigation*
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.				See summary
2. To facilitate the improved health and wellbeing of the whole population.				
3. To reduce poverty and social exclusion.				
4. To create and maintain safer and more secure communities.				
5. To minimise the harm from flooding.				
6. To improve accessibility to all services and facilities.				
7. To make the best use of previously developed land and existing buildings.				
8. To reduce land contamination and safeguard soil quality and quantity.				
9. To ensure air quality continues to improve.				
10. To reduce noise pollution.				
11. To reduce light pollution.				
12. To maintain and improve the water quality of the region's rivers and groundwater				

13. To conserve and enhance biodiversity within the plan area				
14. To protect and enhance the natural, archaeological, historic environments and cultural assets				
15. To reduce road congestion and the need to travel				
16. To reduce greenhouse gases				
17. To ensure that the District is prepared for the impacts of climate change				
18. Provide for employment opportunities				
19. Make land available to meet the needs of the economy				
20. Support economic growth which is inclusive, innovative and sustainable				
21. To achieve sustainable production and use of resources				
22. To increase energy efficiency of new and existing development.				
23. To increase the production and use of renewable energy.				

Summary: Policy CS14 addresses concerns raised in the appraisal of Option 9 (PO May 2006).

Audit trail: Appraisal of Option 9 (PO May 2006) identified that provision for gypsies and travellers meets a need and would generally be positive. The site(s) required would be relatively small and, therefore, impacts not likely to significant. It is noted, however, that there is an increased risk that a greenfield location would be used. Whilst the loss of Green Belt land is an issues in its own right it is also noted that more urban locations would enjoy better accessibility and integration. The criteria provide an appropriate range of consideration to ensure adverse impacts can be avoided.

CS15: Affordable Housing				
SA Objective	**Assessment**			
	Short Term	Medium Term	Long Term	***Comments\Proposed Mitigation***
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	+	+	+	Substantial benefits in combination with Policy CS4, CS16, CS17 and CS18.
2. To facilitate the improved health and wellbeing of the whole population.	+	+	+	Substantial benefits in combination with Policy CS4, CS16, CS17 and CS18.
3. To reduce poverty and social exclusion.	+	+	+	Substantial benefits in combination with Policy CS4, CS16, CS17 and CS18.
4. To create and maintain safer and more secure communities.	+	+	+	Supports the objective, although delivery can only be assured through detailed design criteria in AAPs and Development Briefs.
5. To minimise the harm from flooding.	0	0	0	The policy is not site specific.
6. To improve accessibility to all services and facilities.	0	0	0	The policy is not site specific.
7. To make the best use of previously developed land and existing buildings.	0	0	0	The policy is not site specific.
8. To reduce land contamination and safeguard soil quality and quantity.	0	0	0	The policy is not site specific.
9. To ensure air quality continues to improve.	0	0	0	The policy is not site specific.
10. To reduce noise pollution.	0	0	0	No significant impact likely.
11. To reduce light pollution.	0	0	0	No significant impact likely.
12. To maintain and improve the water quality of the region's rivers and groundwater	0	0	0	No significant impact likely.
13. To conserve and enhance biodiversity within the plan area	0	0	0	No significant impact likely.

14. To protect and enhance the natural, archaeological, historic environments and cultural assets	0	0	0	No significant impact likely.
15. To reduce road congestion and the need to travel	0	0	0	No significant impact likely.
16. To reduce greenhouse gases	0	0	0	No significant impact likely.
17. To ensure that the District is prepared for the impacts of climate change	0	0	0	No significant impact likely.
18. Provide for employment opportunities	0	0	0	No significant impact likely.
19. Make land available to meet the needs of the economy	0	0	0	No significant impact likely.
20. Support economic growth which is inclusive, innovative and sustainable	+	+	+	Supports a supply of key workers.
21. To achieve sustainable production and use of resources	0	0	0	No significant impact likely.
22. To increase energy efficiency of new and existing development.	0	0	0	No significant impact likely.
23. To increase the production and use of renewable energy.	0	0	0	No significant impact likely.

Summary: In combination with Policy CS13 addresses concern that the mix and layout of housing can increase social exclusion where it does not meet appropriate standards. It also addresses concern that the provisions of the Policy in combination with other planning contributions, can affect viability by using a sliding scale and setting the threshold at 15. The option of using greenfield sites through and exceptions criteria is not favoured since this would not be consistent with the importance of good accessibility and social inclusion. Similarly, seeking contributions from employment development is not considered to be appropriate.

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

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

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

CS16: Travel options

SA Objective	Assessment			Comments\Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	+	+	+	Good accessibility is a key element in delivery of a high density strategy.
2. To facilitate the improved health and wellbeing of the whole population.	+	+	+	Good accessibility to services by a variety of modes supports health and well being. Cycling and walking would improve health of the individual
3. To reduce poverty and social exclusion.	+	+	+	Good accessibility to services by a variety of modes social inclusion.
4. To create and maintain safer and more secure communities.	0	0	0	Whilst not considered to be significant at the strategic level, improved provision for walking and cycling can play a role in improving safety of public areas.
5. To minimise the harm from flooding.	0	0	0	No significant impact likely.
6. To improve accessibility to all services and facilities.	+	+	+	Strongly supports the objective.
7. To make the best use of previously developed land and existing buildings.	+	+	+	Reduced need for parking supports high density development.
8. To reduce land contamination and safeguard soil quality and quantity.	+	+	+	Reduced need for parking supports high density development.
9. To ensure air quality continues to improve.	+	+	+	Reduced travel by car will help improve air quality.

10. To reduce noise pollution.	0	0	0	Whilst not likely to be significant, reduced road traffic may reduce noise in some areas.
11. To reduce light pollution.	0	0	0	No significant impact likely.
12. To maintain and improve the water quality of the region's rivers and groundwater	0	0	0	No significant impact likely.
13. To conserve and enhance biodiversity within the plan area	0	0	0	Whilst not considered to be significant at the strategic level, new and enhanced provision for walking and cycling could play a role in improving biodiversity.
14. To protect and enhance the natural, archaeological, historic environments and cultural assets	0	0	0	No significant impact likely.
15. To reduce road congestion and the need to travel	+	+	+	Strongly supports the objective.
16. To reduce greenhouse gases	+	+	+	Strongly supports the objective.
17. To ensure that the District is prepared for the impacts of climate change	+	+	+	Strongly supports the objective.
18. Provide for employment opportunities	0	0	0	No significant impact likely.
19. Make land available to meet the needs of the economy	0	0	0	No significant impact likely.
20. Support economic growth which is inclusive, innovative and sustainable	+	+	+	Reducing congestion is an important factor in achieving sustainable economic growth.
21. To achieve sustainable production and use of resources	+	+	+	Public transport, walking and cycling are more resource efficient modes of transport than the private car.
22. To increase energy efficiency of new and existing development.	0	0	0	No significant impact likely.

23. To increase the production and use of renewable energy.	0	0	0	No significant impact likely.

Summary: Policy CS16 strongly supports the reduction in travel by car and is a key element in facilitating a strategy of high density development. Good accessibility to services by a variety of modes supports health and well being as well as social inclusion. Cycling and walking would improve health of the individual. Whilst not considered to be significant at the strategic level, improved provision for walking and cycling can play a role in improving safety of public areas and enhancing biodiversity. Public transport, walking and cycling are more resource efficient modes of transport than the private car and will help improve air quality. Reducing congestion is also an important factor in achieving sustainable economic growth.

Audit trail: The scope of the Preferred option has been considered through appraisal of E1, E2, E3 and E4 (Issues and Options). The locational strategy seeks to place development in the most accessible locations. Appraisal of Option 6 (Preferred Options) has identified the importance to maximise the use of rail and bus to avoid over reliance on cars and that high potential exists for bus priority measures and improvement of quality and frequency of train services at Merstham, Coulsdon South, Salford, and Earlswood. The potential for a new rail station should also be considered.

Appraisal of E1, E3 and E4 (require provision for public transport, walking, cycling and car sharing) indicated the need for this Preferred Option to help balance accessibility and congestion. This supports a high density strategy. It is also an important element to avoid negative impacts associated with the revision of parking standards (E2), which without improved alternatives could have an adverse impact on accessibility for some groups.

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

CS17: Accessibility				
SA Objective	**Assessment**			
	Short Term	Medium Term	Long Term	*Comments\Proposed Mitigation*
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	+	+	+	Good accessibility is a key element in delivery of a high density strategy.
2. To facilitate the improved health and wellbeing of the whole population.	+	+	+	Policy CS4 and Policy CS17 work together to improve accessibility to services by all modes of transport.
3. To reduce poverty and social exclusion.	+	+	+	Policy CS4 and Policy CS17 work together to improve accessibility to services by all modes of transport.
4. To create and maintain safer and more secure communities.	0	0	0	No significant impact likely.
5. To minimise the harm from flooding.	0	0	0	No significant impact likely.
6. To improve accessibility to all services and facilities.	+	+	+	Policy CS4 and Policy CS17 work together to improve accessibility to services by all modes of transport.
7. To make the best use of previously developed land and existing buildings.	+	+	+	Reduced need for parking supports high density development.
8. To reduce land contamination and safeguard soil quality and quantity.	+	+	+	Reduced need for parking supports high density development.
9. To ensure air quality continues to improve.	+	+	+	Policy CS17 working with Policy CS4 seek to reduced the need to travel by car, helping improve air quality.
10. To reduce noise pollution.	0	0	0	No significant impact likely.

11. To reduce light pollution.	0	0	0	No significant impact likely.
12. To maintain and improve the water quality of the region's rivers and groundwater	0	0	0	No significant impact likely.
13. To conserve and enhance biodiversity within the plan area	0	0	0	No significant impact likely.
14. To protect and enhance the natural, archaeological, historic environments and cultural assets	0	0	0	No significant impact likely.
15. To reduce road congestion and the need to travel	+	+	+	Policy CS17 working with Policy CS4 seek to reduced the need to travel by car, reducing congestion
16. To reduce greenhouse gases	+	+	+	Policy CS17 working with Policy CS4 seek to reduced the need to travel by car, helping reduce emissions of greenhouse gases.
17. To ensure that the District is prepared for the impacts of climate change	+	+	+	Supports the objective in principal, but it will be in the detail of the Site Allocations DPD where access and flood risk can be addressed.
18. Provide for employment opportunities	0	0	0	No significant impact likely.
19. Make land available to meet the needs of the economy	0	0	0	No significant impact likely.
20. Support economic growth which is inclusive, innovative and sustainable	+	+	+	A sustainable pattern of transport is fundamental to sustainable economic growth.
21. To achieve sustainable production and use of resources	+	+	+	Reducing the need to travel by private car supports the objective.
22. To increase energy efficiency of new and existing development.	0	0	0	No significant impact likely.

| 23. To increase the production and use of renewable energy. | 0 | 0 | 0 | No significant impact likely. |

Summary: Policy CS17 reinforces the locational strategy (Policy CS4) in its aim to direct development to the most accessible areas of the Borough. This supports health and well being and social inclusion, as well as reducing the need to travel by car. A sustainable pattern of transport is fundamental to sustainable economic growth and a high density strategy for the provision of housing.

It is considered that Policy CS17 supports the objective of addressing the causes and consequences of climate change in principal, but it will be in the detail of the Site Allocations DPD where access and flood risk can be addressed.

Audit trail: The locational strategy seeks to place development in the most accessible locations. Appraisal of Option 6 (Preferred Options) has identified the importance of maximising the use of rail and bus to avoid over reliance on cars and that high potential exists for bus priority measures and improvement of quality and frequency of train services at Merstham, Coulsdon South, Salford, and Earlswood. The potential for a new rail station should also be considered.

Appraisal of E1, E3 and E4 (require provision for public transport, walking, cycling and car sharing) indicated the need for the elements of this Preferred Option to help balance accessibility and congestion and support a high density strategy. It is also an important element to avoid negative impacts associated with the revision of parking standards (E2), which without improved alternatives could have an adverse impact on accessibility for some groups.

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

CS18: Parking

SA Objective	Assessment			Comments\Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	+	+	+	Limited parking in highly accessible areas is a key element in the delivery of a high density strategy.
2. To facilitate the improved health and wellbeing of the whole population.	0	0	0	No significant impact likely.
3. To reduce poverty and social exclusion.	0	0	0	No significant impact likely.
4. To create and maintain safer and more secure communities.	0	0	0	No significant impact likely.
5. To minimise the harm from flooding.	0	0	0	No significant impact likely.
6. To improve accessibility to all services and facilities.	0	0	0	No significant impact likely.
7. To make the best use of previously developed land and existing buildings.	0	0	0	No significant impact likely.
8. To reduce land contamination and safeguard soil quality and quantity.	0	0	0	No significant impact likely.
9. To ensure air quality continues to improve.	+	+	+	Restrictive parking in areas with good accessibility by walking and cycling will support reduced use of cars and, therefore, maintaining or improving air quality.

10. To reduce noise pollution.	0	0	0	No significant impact likely.
11. To reduce light pollution.	0	0	0	No significant impact likely.
12. To maintain and improve the water quality of the region's rivers and groundwater	0	0	0	No significant impact likely.
13. To conserve and enhance biodiversity within the plan area	0	0	0	No significant impact likely.
14. To protect and enhance the natural, archaeological, historic environments and cultural assets	0	0	0	No significant impact likely.
15. To reduce road congestion and the need to travel	+	+	+	Restrictive parking in areas with good accessibility by walking and cycling will support reduced use of cars.
16. To reduce greenhouse gases	+	+	+	Restrictive parking in areas with good accessibility by walking and cycling will support reduced use of cars and, therefore, reducing emissions of greenhouse gases.
17. To ensure that the District is prepared for the impacts of climate change	+	+	+	Supports the objective in principal, but it will be in the detail of the Site Allocations DPD where access and flood risk can be addressed.
18. Provide for employment opportunities	0	0	0	No significant impact likely.
19. Make land available to meet the needs of the economy	0	0	0	No significant impact likely.
20. Support economic growth which is inclusive, innovative and sustainable	+	+	+	The impact restrictive parking can have on reducing congestion is a key element of sustainable economic growth.
21. To achieve sustainable production and use of resources	+	+	+	Supports increased cycling, walking and public transport which are all more resource efficient than using a car.

22. To increase energy efficiency of new and existing development.	0	0	0	No significant impact likely.
23. To increase the production and use of renewable energy.	0	0	0	No significant impact likely.

Summary: Policy CS18 supports the objectives of Policy CS4, Policy CS16 and Policy CS17 in the aim of reducing the number of journeys made by car. The impact restrictive parking can have on reducing congestion is a key element of sustainable economic growth and in supporting a high density housing strategy in locations with good accessibility by walking, cycling and public transport. It consolidates Policies CS16 and CS17 in helping to reduce air pollution and emissions of greenhouse gases, helping to address the causes and consequences of climate change.

Audit trail: In addition to the comments at Preferred Option 12 and Preferred Option 13, above, it is noted that appraisal of E1, E3 and E4 (require provision for public transport, walking, cycling and car sharing) indicated the need for this Preferred Option to help balance accessibility and congestion; and support a high density strategy. The combination of all three options is important to avoid negative impacts associated with the revision of parking standards (E2), which without improved alternatives could have an adverse impact on accessibility for some groups. Increased cycling and walking is also considered to encourage healthier lifestyle, but would need to be supplemented by policy/criteria with respect to safety.

Changes post submission 2009

There have been a number of changes made to the Core Strategy since it was first submitted in 2009. Each of these stages has been appraised through the SA process; the matrices and results of these appraisals follows. It is important to note that at 'Outstanding Issues' stage, changes were made to the Submission 2009 version of the Core Strategy, rather than the versions revised through 'Suggested Modifications' or 'Schedule A & B' consultations.

Revised Sustainability Appraisal Of the Core Strategy for Reigate & Banstead Incorporating the Assessment of the Council's Suggested Modifications (to the Planning Inspector) to the Core Strategy (July 2009)

The revised version of the SA report was published in July 2009, and was updated by Tom Jones (Independent Consultant)

The initial submission Core Strategy DPD Sustainability Appraisal Report provided an account of the likely significant issues relating to the proposed distribution of development during the plan period. Appraisal was initially based on the proposed South East Plan housing target of 9240 houses in the Borough during the period 2006 to 2026. Whilst different levels of growth were considered as part of the early stages of sustainability appraisal (Issues and Options 2005), the specific level of growth allocated to the Borough in the South East Plan, at that time, was not tested. The revised Sustainability Appraisal Report addressed this by including a commentary with respect to the higher figure of 10,000 houses and, in addition, a clearer account of the likely impacts if an even greater total housing of 12,500 were taken forward. Appraisal matrices for both these scenarios are below.

Sustainability Appraisal of SE Plan Allocation

The South East Plan proposes a target of 10,000 houses in the Borough during the period 2006 to 2026. This will require an additional 76 houses per year for the six years from 2020/21 to 2025/26 and additional employment land.

The submission Core Strategy DPD Sustainability Appraisal Report provides an account of the likely significant issues relating to the proposed distribution of development during the plan period. Whilst different levels of growth were considered as part of the early stages of sustainability appraisal, the specific level of growth allocated to the Borough in the South East Plan has not been tested. It has been necessary, therefore, to consider the sustainability attributes of this increased level of housing and associated employment development in the medium to long term. The Core Strategy policies which would potentially be affected by this higher level of growth are CS4, Strategic locations and CS6 which identifies the specific growth areas. The following provides a consideration of the likely significant impacts of the additional growth.

Findings of appraisal of SE Plan Allocation

The submission Core Strategy DPD Sustainability Appraisal Report provides an account of the likely significant sustainability issues relating to the proposed distribution of development during the plan period. This supplementary report provides further assessment of the specific level of growth allocated to the Borough in the South East Plan.

CS4: Strategic locations for growth

The submission Sustainability Appraisal Report identifies that the Core Strategy strongly supports the objectives of sustainability by setting out a strategy to meet housing need in the most accessible locations and without adverse impacts on the Surrey Hills Area of Outstanding Beauty or important wildlife habitats, notably the Mole Gap to Reigate Escarpment Special Protection Area and the Ashdown Forest Special Area of Conservation.

The strategy for housing would be to concentrate development in Redhill, Reigate, Horley and Banstead through high density mixed use development on existing urban land. The Housing Position Statement anticipates that a surplus of dwellings can be delivered to March 2022 through allocations in urban areas. Additional housing to the level anticipated in the submission Core Strategy would be required between 2021 and 2026 to meet the higher SE Plan target and it is considered that this is deliverable. Additional housing would support a key sustainability objective of providing sufficient housing to meet needs and improve affordability.

Additional housing is not likely to significantly alter the spatial distribution of development, but it could lead to higher densities in the four main settlements identified for the major allocation of development in the Core Strategy (Policy CS6). Whilst this consolidates the opportunity for regeneration and to invest in improvements in public transport, walking and cycling, sustainable transport policy (Policies CS16, CS17 and CS18) will be instrumental in avoiding congestion and the potential for an associated deterioration in air quality. In the long term, however, it is likely that improved engine technology would more than compensate for any additional housing to meet the South East Plan target of 10,000 houses to 2026.

A second issue that may arise from higher densities is the quality of the urban environment as a place to live and work. Whilst noise and light pollution are not likely to be significantly affected and can be controlled through best practice in design, there may be pressure on the ability to provide open space and to avoid harm to heritage interests. These issues can, to an extent, be resolved through design, but success also relies on a strong strategic approach to green infrastructure and the application of sustainable design. Policy CS1, valued landscapes and natural environment, Policy CS2, valued townscapes, Policy CS9, sustainable development; Policy CS10, Sustainable construction; Policy CS 11, Infrastructure delivery; and Policy CS16 provide the basis for this and set the agenda and the Site Allocations DPD, Area Action Plans. In addition, these strategies and design guidance can draw on the Borough Wide Character Assessment to ensure important assets are protected.

A key element of the Core Strategy DPD is to reuse employment land in a more efficient and sustainable manner (smart growth) and reduce the need to travel by car. The need for additional growth between 2022 and 2026 further emphasises the importance that the strategy is able to direct development to the most accessible areas and can maximise the

delivery of affordable housing to enable those employed in the Borough to live locally. The Core Strategy transport policies complement this approach by seeking to improve the mobility of labour to support an efficient commercial sector without increasing congestion.

Additional housing and employment growth would support opportunities for regeneration and provide the opportunity to improve the performance of commercial buildings in the context of climate change.

The ELR indicates that land for commercial development can be met in existing urban areas.

CS6: Area 1, North Downs

Banstead

Appraisal has previously identified that the potential impact with respect to flooding in Banstead was uncertain. The higher SE Plan target of 10,000 is likely to make it more difficult to accommodate sufficient housing without measures to address flood risk and heighten the importance of flood risk assessment. Whilst it is likely that it will be possible to implement appropriate measures to avoid increased flood risk to existing areas and to ensure new development is not at risk, this will be a key issue to assess for the Site Allocations DPD, any Area Action Plan or site specific proposal.

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

Two employment sites have been identified in Banstead with potential for redevelopment. Other sites would come forward on an ad hoc basis and be judged on their merits at that time.

The ELR indicates that land for commercial development can be met in existing urban areas.

CS6: Area 2, Wealden Greensand Ridge

Redhill and Reigate

Appraisal has previously identified that the potential impact with respect to flooding in Redhill was uncertain. The higher SE Plan target of 10,000 is likely to make it more difficult to accommodate sufficient housing without measures to address flood risk and heighten the importance of flood risk assessment. Whilst it is likely that it will be possible to implement appropriate measures to avoid increased flood risk to existing areas and to ensure new development is not at risk, this will be a key issue to assess for any Area Action Plan or site specific proposal.

Air quality concerns were identified in the submission Core Strategy DPD SAR with respect to Reigate High Street. Whilst it is considered likely that the additional development required to meet the SE Plan allocation would not lead to impacts significantly greater than with the original allocation, it will be a key issue to address in the Site Allocations DPD.

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

The ELR indicates that land for commercial development can be met in existing urban areas.

CS6: Horley (Area 3 – Low Weald)

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

The ELR indicates that land for commercial development can be met in existing urban areas.

Additional appraisal, July 2009: Higher level of growth – 12,500 houses		
SA Objective	Predicted impact	Comments\Proposed Mitigation
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	+	Would result in additional housing in existing urban development areas. A greater likelihood that sufficient affordable houses would be delivered.
2. To facilitate the improved health and wellbeing of the whole population.	?	Health/well being and the climate change agenda are linked with respect to the need to provide high density development that doesn't exacerbate traffic congestion and high temperatures in the summer, and the need for privacy. Higher levels of growth could make it more difficult to achieve a balance between high density development and urban open land. Whilst the Infrastructure Capacity Study indicates there are no critical issues, the multiple benefits of green infrastructure, including green roofs are likely to be a key element in addressing this. DM Site Allocations DPD and a PPG17 Strategy will set a greenspace standard, building on CS1, CS 9, CS10 and CS11 and the tariff system will need to support this. Design should also seek to plan for a 60 year life of the home.

3. To reduce poverty and social exclusion.	+	The spatial distribution of development seeks to ensure the most suitable locations for different people/circumstances. Higher growth should remain compatible with addressing poverty and social exclusion, but this relies on effective operation of a tariff system. There is likely to be a need to increase the capacity of existing schools. Quality will depend on funding (tariff) and organisation and this cannot be directed by the Core Strategy DPD. The planning and design of communities must follow principles that will help remove barriers to access to key services and housing and fiscal barriers to mobility. Design and layout to enhance identity and accessibility to services – communities that are walkable with disabled friendly spaces with measures to ensure the long term maintenance of public spaces. Also see above comments on privacy/outlook.
4. To create and maintain safer and more secure communities.	+	Design measures for community safety and security to be included in the DMSA DPD. this would include parking management and street furniture
5. To minimise the harm from flooding.	?	Appraisal has identified that areas of potential conflict exist in delivering SE plan allocation without compromising flood risk. The SFRA and provision of PPG25 help identify the highest areas of risks and measure to avoid exacerbating existing problems. A key element in avoiding flood risk, particularly in Redhill will be the green infrastructure strategy. It is recommended that this includes suds, green roofs and water butts. The policies in the DM and SA DPD should seek to ensure that there is no net increase in surface run off and that permitted development rights with respect to hard standings are appropriately controlled.
6. To improve accessibility to all services and facilities.	?	The spatial distribution of development seeks to ensure the most suitable locations for different people/circumstances. Higher growth should remain compatible, but will rely on the tariff system to ensure adequate provision is made for alternatives to the car for those travelling into the main towns and that traffic and parking are managed effectively.
7. To make the best use of previously developed land and existing buildings.	+	The spatial distribution of development seeks to ensure pdl is used as a priority. Higher growth would require higher densities and this would retain and enhance the contribution to this objective.
8. To reduce land contamination and safeguard soil quality and quantity.	+	Higher density is likely to enhance the viability where contamination exists. See comments above (SA Objective 7).
9. To ensure air quality continues to improve.		Of the 9 AQMAs in the Borough it is considered that in all but Merstham and Horley engine technology will address this issue fully. Measures to reduce the use of the car will, therefore, remain important, particularly in the south of the Borough and in terms of the use of motorways. AQMAs could prove a limiting factor in growth where they are likely to exist in the long term. The requirement to monitor PM25 is likely to identify problems around sand extraction sites. Whilst the distance of population from these sites may prove suitable, it is difficult to predict the likely scenario at this time. The Council will need to work with Surrey County Council to first understand and then, if necessary, address any issues.
10. To reduce noise pollution.	-	High density development – needs to be addressed in DMSA DPD
11. To reduce light pollution.	-	High density development – needs to be addressed in DMSA DPD
12. To maintain and improve the water quality of the region's rivers and groundwater	-	With higher densities in urban areas, the importance of SUDS and measures such as green roofs become of even greater importance. The overall aim should be to minimise or reduce surface water run-off and mitigate the pressure on sewerage capacity.

13. To conserve and enhance biodiversity within the plan area.	?	With a duty to improve biodiversity contained in PPS9, the Green Infrastructure Strategy will be a key measure in delivering the aims of Biodiversity Action Plans. The DMSA DPD can include requirements for developers to use design to encourage biodiversity in line with BAP. An opportunity exists to link the Redhill AAP and biodiversity through designation as a Green Action Zone. A higher level of Code for Sustainable Homes could be made a requirement. Habitats Regulations Assessment will provide further information with respect to the impact of higher density and can inform how accessibility to natural areas is managed. Link to Rights of Way Improvement Plan.
14. To protect and enhance the natural, archaeological, historic environments and cultural assets.	-	No significant difference.
15. To reduce road congestion and the need to travel	?	Congestion is a significant problem with the proposed level of housing level and is also linked to AQMAs. Whilst the ICS and the Surrey Local Transport Plan have not identified any absolute critical traffic levels, it would be a key element of a higher density strategy that improvements to public transport are identified and implemented and that better cycling and walking facilities are provided. Parking management and standards will also play a key role. Area action plans will build on Policies CS16 and CS17. For Redhill, the integration of cycling and rail could be a key strategy to deliver reduced congestion.
16. To reduce greenhouse gases	?	It is difficult to predict the aggregate effect. Whilst high densities will support CCHP and energy efficiency with respect to heat use in buildings, congestion could militate against this. It is considered that improved engine technology and with a strong sustainable transport policy, the Core Strategy will contribute to a reduction in emissions in the medium to long term even with higher growth.
17. To ensure that the District is prepared for the impacts of climate change	?	With higher levels of growth and high density development, the Green Infrastructure Strategy will be a key measure to address the impacts of climate change. Within buildings and public space design and layout will need to reduce the urban heat island effect and green roofs and water butts can help reduce the effect of flash floods. This may be a key part of the strategy for Redhill and it is recommended the area is identified as a Green Action Zone to take forward proposed action in the SEERA publication 'Reducing South East England's Ecological Footprint – A Route Map, 2008'. In this respect Policy CS9 should be worded more strongly.
18. Provide for employment opportunities	+	High density mixed development can provide employment opportunities in the most accessible locations.
19. Make land available to meet the needs of the economy	?	The Employment Land Review indicates that sufficient land is likely to be available for the growth required by the South East Plan. Higher growth levels will require mixed use and high density housing development. The potential for conflict does not raise any additional significant issues but, again, emphasises the importance of the Green Infrastructure Strategy in addressing a broad range of issues including tranquility and privacy.
20. Support economic growth which is inclusive, innovative and sustainable	+	Larger population would support regeneration. Sufficiently varied growth to provide homes for a wide spectrum of people.

21. To achieve sustainable production and use of resources	**+**	Green Action Zone Community Strategy
22. To increase energy efficiency of new and existing development.	**+**	Higher density and increased numbers, especially Redhill will support cost effective solutions for energy provision.
23. To increase the production and use of renewable energy.	**+**	CHP and biomass are cheapest way to meet Code standards (and CCHP). Allowable solutions for each AAP.

SA of Proposed Changes – Schedule A & B (July 2010)

At this stage an appraisal of the proposed changes in Schedule A & B was carried out in-house by Caroline Keogh (Policy Development Officer). The consultation on the Schedules of changes (A&B) was not a statutory stage of consultation. However, the iterative spirit of SA required input at this stage in order to inform the revision of the Core Strategy.

SA Appraisal Matrices

Redhill is the main economic and cultural focus of the Borough. Its good connections mean that it is a transport interchange or gateway for movement not only within the Borough but to inter-regional and international destinations.   For these reasons it has been identified in this strategy as the main centre for consolidation and growth which is in accordance with its status in the South East Plan as a Regional Hub and a centre for significant change. As a strong commercial centre with a successful office market Redhill is an attractive employment location both for employers and workers. It is also an accessible destination for shoppers and people to spend their leisure time. Redhill does not currently fulfil its potential in terms of its retail offer and range of leisure facilities which results in the Borough's residents choosing to, or having to, travel elsewhere. The strategy seeks to ensure that in the future Redhill realises its full potential so that it becomes the thriving centre of the Borough where people will wish to live, work, shop and spend their leisure time.

SA Objective	Assessment			Comments\Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	+	+	+	
2. To facilitate the improved health and wellbeing of the whole population.	0	0	0	The Green Infrastructure strategy will be important here as high density development may bring with it negative impacts on health which significant greening could overcome.
3. To reduce poverty and social exclusion.	+	+	+	
4. To create and maintain safer and more secure communities.	NA			
5. To minimise the harm from flooding.	-	-	-	Potentially negative as Redhill has many areas of flood risk, this will need to be addressed through the SFRA and sequential testing
6. To improve accessibility to all services and facilities.	++	++	++	
7. To make the best use of previously developed land and existing buildings.	+	+	+	
8. To reduce land contamination and safeguard soil quality and quantity.	NA			
9. To ensure air quality continues to improve.	-	-	-	Currently the stop-start road system in the centre of Redhill may impact on air quality if more development is directed towards the centre. The transport strategy should overcome this. There are currently no AQMAs in Redhill TC

10. To reduce noise pollution.	0	0	0	This should be addressed in the design in a higher density environment
11. To reduce light pollution.	0	0	0	This should be addressed in the design in a higher density environment
12. To maintain and improve the water quality of the region's rivers and groundwater	NA			
13. To conserve and enhance biodiversity within the plan area	0	0	0	This needs to be addressed in GIS and DMSA DPD Biodiversity policy
14. To protect and enhance the natural, archaeological, historic environments and cultural assets	0	0	0	
15. To reduce road congestion and the need to travel	+-	+-	+-	Potentially positive with Redhill having excellent public transport links, however, if modal shift is not achieved there is potential here for congestion arising from more development
16. To reduce greenhouse gases	NA			
17. To ensure that the District is prepared for the impacts of climate change	+	+	+	Potential for Redhill to have green roofs
18. Provide for employment opportunities	++	++	++	
19. Make land available to meet the needs of the economy	+	+	+	
20. Support economic growth which is inclusive, innovative and sustainable	+	+	+	
21. To achieve sustainable production and use of resources	NA			
22. To increase energy efficiency of new and existing development.	NA			

SA Objective	Short Term	Medium Term	Long Term	Comments\Proposed Mitigation
23. To increase the production and use of renewable energy.	++	++	++	This could potentially be high due to the potential for CHP in Redhill

Summary: Redhill acknowledged as 'economic and cultural focus of the Borough' scores highly on SA objectives 6, 18, 19 and 20. If this is to score highly on 15 and 16 (reduction of greenhouse gases and road congestion) then both public transport, cycling and road improvements will need to be considered to support the RAAP. As observed in the submission SAR, there is great potential in Redhill for the town to become 'Greener', with CHP, and green infrastructure such as green roofs.

Infrastructure in the Borough is proposed to be funded from a variety of sources depending on the circumstances. In particular, the regeneration initiatives in the Borough would require a different, more innovative, style of funding than the conventional contributions from developers. This is because the regeneration areas have been identified due to their existing deficit in infrastructure and their requirement for social, economic and environmental improvements. The existing deficits in infrastructure needs to be addressed and initiatives to improve the social, economic and environmental quality of life undertaken before development can be directed to the regeneration areas, to avoid exacerbating the situation. Additionally in order to get regeneration started and to attract investment from a variety of sources, both public and private, some initial investment will need to take place to make the area more attractive to investors. The funding for the early stages of regeneration is proposed to come from the sale of publicly owned assets in the regeneration areas. This "front loaded" funding would also signal to the existing residents that change is coming in their neighbourhood and enable them to become involved with the future regeneration projects in line with the Community Plan aspiration to take personal responsibility for improving the area.

The Council will also continue use the following measures to undertake infrastructure improvements in the Borough;

- Sale of public owned assets to fund infrastructure in regeneration areas.
- Bidding for grant funding to undertake regeneration initiatives.
- Undertaking projects which have shared or similar objectives with Surrey County Council and other partners.

Coordinating infrastructure provision with different providers for greater efficiency and to enable economies of scale when building or upgrading infrastructure. (More detailed information about infrastructure funding is included in Section 6 – Infrastructure)

This is illustrated on a Borough wide basis in table (1) below. More detail about the breakdown for each of the 3 areas in the Borough is provided in Section 5 – Place Shaping.

SA Objective	Assessment			Comments\Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	+	+	+	
2. To facilitate the improved health and wellbeing of the whole population.	+	+	+	

3. To reduce poverty and social exclusion.	++	++	++	Addressing deficits in infrastructure which will be felt more in the regeneration areas.
4. To create and maintain safer and more secure communities.	+	+	=	
5. To minimise the harm from flooding.	+	+	+	Development on PDL could improve flood risk if SuDS built in, particularly important for Redhill.
6. To improve accessibility to all services and facilities.	+	+	+	
7. To make the best use of previously developed land and existing buildings.	+	+	+	
8. To reduce land contamination and safeguard soil quality and quantity.	0	0	0	
9. To ensure air quality continues to improve.	0	0	0	
10. To reduce noise pollution.	0	0	0	
11. To reduce light pollution.	0	0	0	
12. To maintain and improve the water quality of the region's rivers and groundwater	0	0	0	
13. To conserve and enhance biodiversity within the plan area	+	+	++	Green Infrastructure as part of environmental improvements
14. To protect and enhance the natural, archaeological, historic environments and cultural assets	0	0	0	
15. To reduce road congestion and the need to travel	0	0	0	
16. To reduce greenhouse gases	0	0	0	
17. To ensure that the District is prepared for the impacts of climate change	+	+	+	Climate change mitigation can be designed into the improvements, green infrastructure improvements will score highly.
18. Provide for employment opportunities	0	0	0	

	Short Term	Medium Term	Long Term	
19. Make land available to meet the needs of the economy	0	0	0	
20. Support economic growth which is inclusive, innovative and sustainable	0	0	0	
21. To achieve sustainable production and use of resources	?	?	?	Can be considered as part of the regeneration
22. To increase energy efficiency of new and existing development.	?	?	?	Can be considered as part of the regeneration
23. To increase the production and use of renewable energy.	?	?	?	Can be considered as part of the regeneration

Summary: Addressing deficits in infrastructure will be felt more in the regeneration areas and score highly on SA objective 3. This also scores well on objective 13 as enhancing biodiversity can be designed into the regeneration programme

Insert new paragraphs
4.16

There are also proposals in other plans that could affect the Green Belt. The Surrey Waste Plan 2008 identifies three sites within the Borough where development related to waste treatment is considered suitable. It also has policies that recognise the possibility that other waste related development may need to be located in the countryside. Sites identified in the Surrey Waste Plan will be shown in the Proposals Map DPD.

SA Objective	Assessment			Comments\Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	NA	NA	NA	
2. To facilitate the improved health and wellbeing of the whole population.	-	-	-	Proximity to residential housing will need to be considered.
3. To reduce poverty and social exclusion.	NA	NA	NA	
4. To create and maintain safer and more secure communities.	NA	NA	NA	
5. To minimise the harm from flooding.	NA	NA	NA	
6. To improve accessibility to all services and facilities.	NA	NA	NA	

7. To make the best use of previously developed land and existing buildings.	NA	NA	NA	
8. To reduce land contamination and safeguard soil quality and quantity.	--	--	--	
9. To ensure air quality continues to improve.	-	-	-	Potential negative impact must be monitored.
10. To reduce noise pollution.	-	-	-	Noise and disturbance in countryside from site and associated transport
11. To reduce light pollution.	NA	NA	NA	
12. To maintain and improve the water quality of the region's rivers and groundwater	-	-	-	Waste related development in the countryside may have a negative impact on groundwater levels.
13. To conserve and enhance biodiversity within the plan area	-	-	-	Waste related development in the countryside may have a negative impact on biodiversity due to disturbance and loss of wildlife corridor
14. To protect and enhance the natural, archaeological, historic environments and cultural assets	-	-	-	Waste related development in the countryside may have a negative impact on the natural environment
15. To reduce road congestion and the need to travel	-	-	-	Haulage to and from the site will increase road use within the borough.
16. To reduce greenhouse gases	NA	NA	NA	
17. To ensure that the District is prepared for the impacts of climate change	NA	NA	NA	
18. Provide for employment opportunities	NA	NA	NA	
19. Make land available to meet the needs of the economy	+	+	+	
20. Support economic growth which is inclusive, innovative and sustainable	+	+	+	Innovative ways to recycle and dispose of waste

	Short Term	Medium Term	Long Term	
21. To achieve sustainable production and use of resources	+	+	+	May improve recycling output locally
22. To increase energy efficiency of new and existing development.	NA	NA	NA	
23. To increase the production and use of renewable energy.	NA	NA	NA	

Summary: The 3 sites in the Waste Plan have already been identified and mitigation measures will need to be put in place to safeguard the borough from the potential disturbance these may cause. Further waste related development sites will need to be appraised in their own right before designated.

There is one Major Developed Site identified in the Borough Local Plan (East Surrey Hospital). The Council will review the designation of Major Developed Sites and identify new ones as appropriate in the DMSA DPD.

When considering whether sites should be designated as Major Developed Sites the Council will use the following criteria:

1. A site should have a substantial footprint of development and buildings that cumulatively have a significant impact on the openness of the Green Belt;

2. Where a site is in continuing use, there should be an identifiable core of buildings that could accommodate limited infill which would help secure jobs and prosperity without having a greater impact on the openness of the Green Belt and the purposes of including land within it than the existing development;

3. Alternatively, the complete or partial redevelopment of the site would offer the opportunity for environmental improvement without adding to the impact on the openness of the Green Belt and the purposes of including land within it; and

4. The Council will consider whether there are any particular environmental, infrastructure or sustainability constraints which would preclude the site from being designated as a Major Developed Site.

SA Objective	Assessment			Comments\Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	NA	NA	NA	
2. To facilitate the improved health and wellbeing of the whole population.	+	+	+	Hospital site, the policy allows for further development to this site
3. To reduce poverty and social exclusion.	NA	NA	NA	

4. To create and maintain safer and more secure communities.	NA	NA	NA	
5. To minimise the harm from flooding.	NA	NA	NA	
6. To improve accessibility to all services and facilities.	0	0	0	Not necessarily the most accessible site
7. To make the best use of previously developed land and existing buildings.	+	+	+	Infilling will increased density on PDL
8. To reduce land contamination and safeguard soil quality and quantity.	NA	NA	NA	
9. To ensure air quality continues to improve.	NA	NA	NA	
10. To reduce noise pollution.	NA	NA	NA	
11. To reduce light pollution.	NA	NA	NA	
12. To maintain and improve the water quality of the region's rivers and groundwater	NA	NA	NA	
13. To conserve and enhance biodiversity within the plan area	NA	NA	NA	
14. To protect and enhance the natural, archaeological, historic environments and cultural assets	NA	NA	NA	
15. To reduce road congestion and the need to travel	-	-	-	Increased density on the site may increase congestion in what may not be the most accessible location for a large development
16. To reduce greenhouse gases	NA	NA	NA	
17. To ensure that the District is prepared for the impacts of climate change	NA	NA	NA	
18. Provide for employment opportunities	+	+	+	
19. Make land available to meet the needs of the economy	+	+	+	

20. Support economic growth which is inclusive, innovative and sustainable	+	+	+	
21. To achieve sustainable production and use of resources	NA	NA	NA	
22. To increase energy efficiency of new and existing development.	NA	NA	NA	
23. To increase the production and use of renewable energy.	+	+	+	Increasing the density on a site may make CHP a viable option.

Summary: Any negative impact from these sites is already felt, by designating them controls are made on how much infilling etc can take place, thus lessening further impact on the openness of the Green Belt.

4.16b
Rural Development

Agricultural development and small scale development for the reasonable needs of the rural economy, outdoor recreation and the local community will be supported in the countryside (including the Green Belt) and detailed policies setting out the criteria against which proposals for such development will be assessed will be included in the DMSA DPD.

SA Objective	Assessment			Comments\Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	+	+	+	Reasonable needs of the local community may mean affordable housing
2. To facilitate the improved health and wellbeing of the whole population.	+	+	+	Reasonable needs of the local community may mean health facilities / community facilities
3. To reduce poverty and social exclusion.	+	+	+	Reasonable needs of the local community may mean community facilities
4. To create and maintain safer and more secure communities.	0	0	0	This would need to be designed into any development
5. To minimise the harm from flooding.	0-	0-	0-	This would need to be designed into any development. Loss of green space may worsen flood risk
6. To improve accessibility to all services and facilities.	+	+	+	Reasonable needs of the local community may mean health facilities / community facilities

7. To make the best use of previously developed land and existing buildings.	+	+	+	Reuse of farm buidlings
8. To reduce land contamination and safeguard soil quality and quantity.	-	-	-	Potentially negative if development allowed on best and most versatile agricultural land
9. To ensure air quality continues to improve.	NA	NA	NA	
10. To reduce noise pollution.	-	-	-	Potentially negative – criteria based policy would need to inhibit noisy outdoor recreation
11. To reduce light pollution.	-	-	-	Potentially negative – criteria based policy would need to inhibit uses that may impact on light sensitive areas.
12. To maintain and improve the water quality of the region's rivers and groundwater	0	0	0	
13. To conserve and enhance biodiversity within the plan area	-	-	-	Potentially negative – criteria based policy will need to guard against loss of biodiversity or loss of wildlife corridors
14. To protect and enhance the natural, archaeological, historic environments and cultural assets	-	-	-	
15. To reduce road congestion and the need to travel	-	-	-	May not be the most accessible or sustainable location for development
16. To reduce greenhouse gases	0	0	0	
17. To ensure that the District is prepared for the impacts of climate change	NA	NA	NA	
18. Provide for employment opportunities	+	+	+	
19. Make land available to meet the needs of the economy	+	+	+	
20. Support economic growth which is inclusive, innovative and sustainable	++	++	++	Farm diversification

21. To achieve sustainable production and use of resources	NA			
22. To increase energy efficiency of new and existing development.	NA			
23. To increase the production and use of renewable energy.	NA			
Summary: Potentially negative impacts on the character of the countryside, biodiversity, noise, light, soil quality and flood risk; these factors would need to be addressed in a criteria based policy. Positive impacts on the rural economy from the creation of jobs and strengthening of local businesses.				

4.16c
Green Infrastructure

In addition to the policies of the Core Strategy, DMSA DPD and Redhill TCAAP the Council will develop a Green Infrastructure Strategy which will facilitate the development and management of a network of multi-functional green spaces. The Green Infrastructure Strategy will set spatial priorities to meet the needs of specific areas of the Borough where there are deficiencies, and functional priorities to address specific deficiencies in provision, for example bio-diversity or recreational provision. It will also seek to meet other objectives such as mitigating flood risk and improving sustainable transport links (cycle and pedestrian routes). The Green Infrastructure Strategy will be implemented through a range of projects, which could include the enhancement of existing spaces or the provision of new sites or links, the modification of existing management practices and the encouragement of best practice. The Green Infrastructure Strategy will be supported by a delivery plan which will link projects to delivery partners and funding streams. The evidence collated in the preparation of the Green Infrastructure Strategy will inform the open space and other green fabric designations to be made in the DMSA DPD.

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4.   The Council will plan, provide and manage a substantial network of multi-functional green space. The specific features of the Borough that make up the green space network, including open spaces, green corridors and other elements of the green fabric as referred to in Part 2 above, will be identified in the DMSA DPD.

5.   The following areas will be protected and where development is proposed it will be required to respect and enhance the landscape character of the area:

- The Surrey Hills Area of Outstanding Natural Beauty (AONB) is a landscape of national importance and therefore will be provided with the highest level of protection. The management and enhancement of the area will have particular regard to the potential impacts of development on ridgelines, significant views, tranquillity and levels of light, including light pollution.

- The AGLV will be retained for its own sake, as a buffer to the Surrey Hills AONB and to protect views from and into the AONB, until such time as there has been a review of the AONB boundary. Until the AONB boundary review has been carried out the same principles will be applied to the Area of Great Landscape Value (AGLV) as are applied to the AONB, with particular focus on ensuring development avoids harm to the AONB, particularly views from and into the AONB and the features identified above.

- All other areas of countryside outside of the AONB, (and AGLV whilst it remains in force) whilst not of national importance, have their own distinctive landscape character which should be protected and enhanced [Footnote].

SA Objective	Assessment			Comments\Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	NA	NA	NA	
2. To facilitate the improved health and wellbeing of the whole population.	++	++	++	
3. To reduce poverty and social exclusion.	+	+	+	

4. To create and maintain safer and more secure communities.	NA	NA	NA	
5. To minimise the harm from flooding.	++	++	++	
6. To improve accessibility to all services and facilities.	NA	NA	NA	
7. To make the best use of previously developed land and existing buildings.	NA	NA	NA	
8. To reduce land contamination and safeguard soil quality and quantity.	++	++	++	
9. To ensure air quality continues to improve.	+	+	+	
10. To reduce noise pollution.	NA	NA	NA	
11. To reduce light pollution.	NA	NA	NA	
12. To maintain and improve the water quality of the region's rivers and groundwater	0	0	0	
13. To conserve and enhance biodiversity within the plan area	++	++	++	
14. To protect and enhance the natural, archaeological, historic environments and cultural assets	++	++	++	
15. To reduce road congestion and the need to travel	+	+	+	
16. To reduce greenhouse gases	0	0	0	
17. To ensure that the District is prepared for the impacts of climate change	++	++	++	
18. Provide for employment opportunities	NA			
19. Make land available to meet the needs of the economy	NA			

20. Support economic growth which is inclusive, innovative and sustainable	NA			
21. To achieve sustainable production and use of resources	NA			
22. To increase energy efficiency of new and existing development.	NA			
23. To increase the production and use of renewable energy.	NA			

Summary: The GIS not only scores highly on the environmental objectives, it also scores highly on reducing the need to travel, and particularly well on preparing for the impacts of climate change. The GIS also scores well on the social objectives with better access for all the good quality open space. Plan, provide and manage multi-functional green space also scores highly on the same objectives.

…for these different places. The DMSADPD will include policies about development densities which are informed by character and sustainability. Further advice in the form of specific design guidance on character density and parking will be developed for the built up areas in SPD guidance.

SA Objective	Assessment			Comments\Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	-	-	-	This may reduce the number of affordable properties available in certain areas.
2. To facilitate the improved health and wellbeing of the whole population.	0	0	0	
3. To reduce poverty and social exclusion.	-	-	-	Certain areas will become more exclusive by virtue of their character and density.
4. To create and maintain safer and more secure communities.	NA	NA	NA	
5. To minimise the harm from flooding.	NA	NA	NA	
6. To improve accessibility to all services and facilities.	+	+	+	Accessibility may inform these densities
7. To make the best use of previously developed land and existing buildings.	-	-	-	Density informed by character may not make the best use of PDL
8. To reduce land contamination and safeguard soil quality and quantity.	NA	NA	NA	
9. To ensure air quality continues to improve.	NA			
10. To reduce noise pollution.	NA			
11. To reduce light pollution.	NA			

12. To maintain and improve the water quality of the region's rivers and groundwater	NA			
13. To conserve and enhance biodiversity within the plan area	NA			
14. To protect and enhance the natural, archaeological, historic environments and cultural assets	+	+	+	
15. To reduce road congestion and the need to travel	+	+	+	Accessibility may inform the densities
16. To reduce greenhouse gases	0	0	0	
17. To ensure that the District is prepared for the impacts of climate change	-	-	-	Potentially negative – if some areas are to be high density then mitigation for heat island effects need to be considered. For example building design and greening.
18. Provide for employment opportunities	NA			
19. Make land available to meet the needs of the economy	NA			
20. Support economic growth which is inclusive, innovative and sustainable	NA			
21. To achieve sustainable production and use of resources	NA			
22. To increase energy efficiency of new and existing development.	NA			
23. To increase the production and use of renewable energy.	NA			

Summary: This scores positively on the protection of character, but negatively on social aspects. Mitigation against climate change, particularly heat, needs to be in place if higher densities are to be considered in certain areas.

Page 26, Policy CS2 Implementation:

This policy will be implemented through:

• Development Management and Site Allocations Development Plan Document (complete by 2012);
Existing policies designed to manage and protect valued townscapes will be reviewed and new policies and site allocations will be set out as appropriate. New policies will also seek to deliver high quality, environmentally sustainable design and promote biodiversity.

SA Objective	Assessment			Comments\Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	NA			
2. To facilitate the improved health and wellbeing of the whole population.	NA			
3. To reduce poverty and social exclusion.	NA			
4. To create and maintain safer and more secure communities.	NA			
5. To minimise the harm from flooding.	+	+	+	Environmentally sustainable design should incorporate flood risk alleviation measures into its design
6. To improve accessibility to all services and facilities.	0	0	0	
7. To make the best use of previously developed land and existing buildings.	+	+	+	
8. To reduce land contamination and safeguard soil quality and quantity.	NA			
9. To ensure air quality continues to improve.	NA			
10. To reduce noise pollution.	NA			
11. To reduce light pollution.	NA			
12. To maintain and improve the water quality of the region's rivers and groundwater	NA			
13. To conserve and enhance biodiversity within the plan area	++	++	++	Biodiversity within the townscape will improve wildlife corridors in the borough

14. To protect and enhance the natural, archaeological, historic environments and cultural assets	+	+	+	
15. To reduce road congestion and the need to travel	NA			
16. To reduce greenhouse gases	NA			
17. To ensure that the District is prepared for the impacts of climate change	+	+	+	Promotion of biodiversity could include green spaces and green roofs.
18. Provide for employment opportunities	NA			
19. Make land available to meet the needs of the economy	NA			
20. Support economic growth which is inclusive, innovative and sustainable	NA			
21. To achieve sustainable production and use of resources	NA			
22. To increase energy efficiency of new and existing development.	NA			
23. To increase the production and use of renewable energy.	NA			

Summary: Promotion of biodiversity and environmentally sustainable design scores positively against SA objectives 5, 7, 13, 14 and 17.

4.24a

There is also an oversupply of land for industrial uses and at the same time demand for a significant amount of office floorspace. Future employment land uses need to reflect the shift in the local economic market towards office floorspace development. The Core Strategy sets out the strategic requirement for office floorspace across Borough. These quanta set the minimum level of office floorspace needed to meet the Borough's identified economic needs.

4.24b

Employment sites identified in the Borough Local Plan will be reviewed and those to be retained will be identified in the DMSA DPD. The DMSA DPD will contain policies to identify and protect areas of employment land and facilitate the provision of an increased proportion of office floorspace and wider range of employment uses within defined employment sites. This DPD will set out employment policies that can respond to changes in the Borough's economic market to provide a flexible supply of land to meet the varying needs of the local economy over the Plan period. It will also set out criteria for the assessment of proposals affecting sites that are in use for employment purposes but that are not designated as employment areas, and proposals for new economic development uses outside defined employment areas.

SA Objective	Assessment			Comments\Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	0	0	0	Competition between employment land and land for housing
2. To facilitate the improved health and wellbeing of the whole population.	NA			
3. To reduce poverty and social exclusion.	NA			
4. To create and maintain safer and more secure communities.	NA			
5. To minimise the harm from flooding.	NA			
6. To improve accessibility to all services and facilities.	NA			
7. To make the best use of previously developed land and existing buildings.	+	+	+	
8. To reduce land contamination and safeguard soil quality and quantity.	NA			
9. To ensure air quality continues to improve.	NA			
10. To reduce noise pollution.	NA			
11. To reduce light pollution.	NA			
12. To maintain and improve the water quality of the region's rivers and groundwater	NA			

13. To conserve and enhance biodiversity within the plan area	NA			
14. To protect and enhance the natural, archaeological, historic environments and cultural assets	NA			
15. To reduce road congestion and the need to travel	+	+	+	Adequate provision of employment in the borough will decrease the current out-flow of employees to work outside the borough
16. To reduce greenhouse gases	NA			
17. To ensure that the District is prepared for the impacts of climate change	NA			
18. Provide for employment opportunities	++	++	++	
19. Make land available to meet the needs of the economy	++	++	++	
20. Support economic growth which is inclusive, innovative and sustainable	++	++	++	
21. To achieve sustainable production and use of resources	NA			
22. To increase energy efficiency of new and existing development.	NA			
23. To increase the production and use of renewable energy.	NA			

Summary: A flexible supply of employment space score positively against the economy SA objectives. The employment sites policies will be appraised again as part of the DMSA SA process.

Page 31 Policy CS3 Valued People 1 new bullet point 6
Existing employment sites identified in the Borough Local Plan will be reviewed in order to identify whether they are well located, suitable for employment use and have good prospects of being used for employment purposes. This assessment will form the basis for the identification of employment sites in the DMSA DPD. In carrying out the review the sites will be assessed against the following criteria:

- o   Age/quality of buildings
- o   Vacant land/buildings on site
- o   Access to amenities/facilities
- o   Strategic access
- o   Adequacy of servicing

Page 31, Policy CS3 Implementation
- o   Development Management and Site Allocations Development Plan Document (completed by 2012); will review the existing BLP policies for economic and commercial development. New policies, such as those to ensure the development of small and medium enterprises, the reuse and adaptation of existing industrial sites for a number of employment uses and site allocations will be set out as appropriate;
- o   Adopted Planning Obligations and Infrastructure Contributions SPD and proposed Core Strategy Infrastructure Provision SPD.
- o   Consideration and determination of planning applications and appeals.

SA Objective	Assessment			Comments\Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	0	0	0	Competition between land for employment and land for residential use.
2. To facilitate the improved health and wellbeing of the whole population.	NA			
3. To reduce poverty and social exclusion.	NA			
4. To create and maintain safer and more secure communities.	NA			
5. To minimise the harm from flooding.	0	0	0	This could be an opportunity to use PPS25 sequential testing to identify suitable employment sites.
6. To improve accessibility to all services and facilities.	NA			
7. To make the best use of previously developed land and existing buildings.	++	++	++	
8. To reduce land contamination and safeguard soil quality and quantity.	NA			
9. To ensure air quality continues to improve.	NA			
10. To reduce noise pollution.	NA			
11. To reduce light pollution.	NA			

12. To maintain and improve the water quality of the region's rivers and groundwater	NA			
13. To conserve and enhance biodiversity within the plan area	NA			
14. To protect and enhance the natural, archaeological, historic environments and cultural assets	NA			
15. To reduce road congestion and the need to travel	NA			
16. To reduce greenhouse gases	NA			
17. To ensure that the District is prepared for the impacts of climate change	NA			
18. Provide for employment opportunities	++	++	++	
19. Make land available to meet the needs of the economy	++	++	++	
20. Support economic growth which is inclusive, innovative and sustainable	++	++	++	
21. To achieve sustainable production and use of resources	NA			
22. To increase energy efficiency of new and existing development.	NA			
23. To increase the production and use of renewable energy.	NA			

Summary: This scores positively against the economy SA objectives. There is an opportunity here to use sequential testing, in line with PPS25, to identify and substitute sites with a high flood risk.

New Composite policy insert in place of CS4 & CS5:

The Council will allocate land and direct development into the locations in the sequence set out below and as indicated in Figure 6:

1. Priority locations for growth and regeneration (all of equal priority):
- *Redhill Town Centre;*
- *Horley Town Centre;*
- *Horley North East and North West sectors;*
- *Preston Regeneration Area;*
- *Merstham Regeneration Area;*
- *Other regeneration areas as identified by the Council and its partners;*

2. Built-up areas of Redhill, Reigate, Horley and Banstead:
  (i) Town Centres first; then
  (ii) Edge of centre locations within walking distance to town centres;

3. Other sustainable sites in the existing urban area according to the criteria for sustainability.

Implementation

This policy will be implemented through:
- *Development Management and Site Allocations Development Plan Document; will include policies and site allocations to deliver the strategy by focussing development in sustainable locations or regeneration areas;*
- *New Growth Points Programme of Development;*
- *Strategic Housing Land Availability Assessment;*
- *Employment Land Review;*
- *Retail and Leisure Monitoring and Capacity Studies*
- *Green Infrastructure Strategy*
- *Legal agreements with the Horley NW and NE sector developers;*
- *Horley Master Plan policies in the Local Plan and associated SPDs;*
- *SFRA which identifies areas at risk from flooding where development should be avoided;*
Consideration and determination of planning appeals.

SA Objective	Assessment			Comments\Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	++	++	++	Regeneration areas
2. To facilitate the improved health and wellbeing of the whole population.	NA			
3. To reduce poverty and social exclusion.	++	++	++	

4. To create and maintain safer and more secure communities.	+	+	+	Regeneration area improvements
5. To minimise the harm from flooding.	++	++	++	Redhill town centre is no longer the highest priority area for development, thereby giving more flexibility when carrying out the sequential test.
6. To improve accessibility to all services and facilities.	NA			
7. To make the best use of previously developed land and existing buildings.	++	++	++	
8. To reduce land contamination and safeguard soil quality and quantity.	NA			
9. To ensure air quality continues to improve.	NA			
10. To reduce noise pollution.	NA			
11. To reduce light pollution.	NA			
12. To maintain and improve the water quality of the region's rivers and groundwater	NA			
13. To conserve and enhance biodiversity within the plan area	+	+	+	Loss of 'urban extensions' and development directed to urban areas means less loss of green field land.
14. To protect and enhance the natural, archaeological, historic environments and cultural assets	+	+	+	Development solely in the existing urban areas will help protect the natural assets of the borough, development will be in line with design guidance and legislation to protect listed buildings, conservation areas etc.
15. To reduce road congestion and the need to travel	+	+	+	Development close to town centres / walking distance to town centres will reduce the need to travel.
16. To reduce greenhouse gases	NA			
17. To ensure that the District is prepared for the impacts of climate change	0	0	0	This could potentially be negative as directing development into urban areas will increase density and therefore heat islands. There is opportunity here to design in climate change adaptations, and green infrastructure to deal with flooding / heat.
18. Provide for employment opportunities	NA			

	Short Term	Medium Term	Long Term	
19. Make land available to meet the needs of the economy	NA			
20. Support economic growth which is inclusive, innovative and sustainable	NA			
21. To achieve sustainable production and use of resources	NA			
22. To increase energy efficiency of new and existing development.	++	++	++	Regeneration
23. To increase the production and use of renewable energy.	+	+	+	Higher density will make CHP more viable.

Summary: This has been appraised as separate policies CS4 and CS5 in the previous submission document. This appraisal has been carried out only on the changes from the previous appraisal. The new composite policy does not mention the 'sustainable urban extensions' which scores well in areas such as biodiversity and protection of the natural environment – however design mitigation will be needed for higher density development within the built up area to allow for climate change.

Infrastructure

Page 44, new paragraph 6 (Infrastructure) Infrastructure requirements in this area are generally based upon improving existing infrastructure and ensuring that development is directed to locations that are already well served by existing services or those that can be upgraded. The traffic congestion should be addressed through the improvement of alternative forms of transport to reduce the need to use the car. The regeneration of Preston requires the improvement of infrastructure to meet the needs of the existing residents and new infrastructure to meet the needs of new development. A comprehensive redevelopment including the provision of a focus "community hub" is proposed to meet most of these requirements.

Page 50, new paragraph 5 Redhill as a transport hub will require a significant amount of improvements to the transport infrastructure to ensure that it fulfils this role. The infrastructure required for the Merstham regeneration area will primarily be provided through the provision of a new community hub.

Page 59, new paragraph 6 There is a comprehensive plan to provide new infrastructure to meet the needs of the development in the planned new neighbourhoods in the North East and North West sectors.

SA Objective	Assessment			*Comments\Proposed Mitigation*
	Short Term	Medium Term	Long Term	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	NA	NA	NA	
2. To facilitate the improved health and wellbeing of the whole population.	+	+	?	Community hub in Preston and Merstham

3. To reduce poverty and social exclusion.	+	+	?	Community hub in Preston and Merstham. Greater accessibility without the use of a car will decrease social exclusion. New infrastructure may be required in the long term
4. To create and maintain safer and more secure communities.	NA			
5. To minimise the harm from flooding.	NA			
6. To improve accessibility to all services and facilities.	+	+	?	New infrastructure may be required in the long term
7. To make the best use of previously developed land and existing buildings.	+	+	+	
8. To reduce land contamination and safeguard soil quality and quantity.	NA			
9. To ensure air quality continues to improve.	++	++	++	Improved transport infrastructure and location of development near to services
10. To reduce noise pollution.	Na			
11. To reduce light pollution.	NA			
12. To maintain and improve the water quality of the region's rivers and groundwater	NA			
13. To conserve and enhance biodiversity within the plan area	NA			
14. To protect and enhance the natural, archaeological, historic environments and cultural assets	NA			
15. To reduce road congestion and the need to travel	++	++	++	New infrastructure may be required in the long term
16. To reduce greenhouse gases	+	+	+	
17. To ensure that the District is prepared for the impacts of climate change	NA			

SA Objective	Short Term	Medium Term	Long Term	Comments\Proposed Mitigation
18. Provide for employment opportunities	+	+	+	Possibly in a small scale
19. Make land available to meet the needs of the economy	NA			
20. Support economic growth which is inclusive, innovative and sustainable	NA			
21. To achieve sustainable production and use of resources	NA			
22. To increase energy efficiency of new and existing development.	NA			
23. To increase the production and use of renewable energy.	NA			

Summary: Greater accessibility and services closer to home scores well on 15, 16 and 18, by reducing the need to travel. The community hubs score positively in terms of social objectives. There are question marks over some longer term infrastructure needs that will be improved rather than replaced.

As the main urban centre in the Borough, a regional hub and a centre for significant change, Redhill will be a focus for employment development. It is the key location for accommodating additional office floorspace. ~~The Council has identified a need for an additional 2 ha of office employment land over the Plan period for the whole of the Borough. Whilst some A significant volume of the employment space will be delivered through the re-use of sites, intensification and allocation of land for specific uses of this will be specifically allocated to Redhill in the Area Action Plan, or through the DMSADPD, this is not expected to be significant.~~

Redhill has a town centre employment area, five general employment areas including Holmethorpe Industrial estate and Wells Place and two areas for small businesses. It has the largest total employment area in the Borough. The Economic Market Assessment has identified a need for an additional x,xxxm² (to be confirmed) office floorspace over the Plan period for the whole of the Borough. At least x,xxxm² (to be confirmed) will be delivered in the Redhill area, of which x,xxxm² (to be confirmed) will be identified in the Redhill Town Centre Area Action Plan. Much of this employment space will be delivered through the re-use and intensification of existing employment sites.

SA Objective	Assessment			Comments\Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	0	0	0	Conflict in land uses
2. To facilitate the improved health and wellbeing of the whole population.	NA			

3. To reduce poverty and social exclusion.	+	+	+	More employment in an easily accessible location
4. To create and maintain safer and more secure communities.	NA			
5. To minimise the harm from flooding.	-	-	-	Potential negative as there are a number of flood risk areas within Redhill. Opportunity to substitute residential for employment use as part of sequential testing
6. To improve accessibility to all services and facilities.	+	+	+	
7. To make the best use of previously developed land and existing buildings.	++	++	++	
8. To reduce land contamination and safeguard soil quality and quantity.	NA			
9. To ensure air quality continues to improve.	+	+	+	Directing employment into area easily accessible by public transport
10. To reduce noise pollution.	NA			
11. To reduce light pollution.	NA			
12. To maintain and improve the water quality of the region's rivers and groundwater	NA			
13. To conserve and enhance biodiversity within the plan area	+	+	+	Directing employment areas to urban rather than rural areas
14. To protect and enhance the natural, archaeological, historic environments and cultural assets	+	+	+	Directing employment areas to urban rather than rural areas
15. To reduce road congestion and the need to travel	+	+	+	Redhill is an easily accessible location by public transport
16. To reduce greenhouse gases	+	+	+	Redhill is an easily accessible location by public transport
17. To ensure that the District is prepared for the impacts of climate change	0	0	0	Currently neutral, however there is opportunity to design in climate change mitigation measures into employment developments, such as green roofs and open space.

SA Objective	Short Term	Medium Term	Long Term	Comments\Proposed Mitigation
18. Provide for employment opportunities	++	++	++	
19. Make land available to meet the needs of the economy	++	++	++	
20. Support economic growth which is inclusive, innovative and sustainable	+	+	+	
21. To achieve sustainable production and use of resources	NA			
22. To increase energy efficiency of new and existing development.	+	+	+	Opportunity to increase sustainability credentials of existing employment buildings
23. To increase the production and use of renewable energy.	NA			

Summary: This scores positively against many of the SA objectives, in terms of directing employment into an area that is easily accessible by public transport, and into urban rather than rural areas. There are potential negative impacts with regard to flood risk; sequential testing must be applied when choosing sites and opportunity may be taken to substitute sites of a higher vulnerability for employment uses. There is a great opportunity in Redhill for employment development to improve their sustainability credentials by becoming more energy efficient and designing in mitigation measures against climate change such as green roofs.

A Strategic Flood Risk Assessment has been carried out for the Borough to support the Core Strategy and has identified or confirmed those areas of flood risk where development should be avoided. In accordance with guidance in PPS25 the SRFA indicated that Redhill was at risk from flooding and a sequential test was applied to the area to determine whether all potential housing sites could be located outside of areas of flood risk. Some sites were identified which, for sound planning reasons, could still be considered suitable for development. The exceptions test was applied to these sites and it was concluded that these sites can be made safe through design and mitigation measures. In line with PPS25, the Council will require development proposals to be accompanied by necessary flood risk assessments as part of the consideration of such proposals, including the appropriate design and use of Sustainable Urban Drainage Systems (SUDS) where these can effectively manage stormwater drainage. Within flood zones 2 and 3 where the sequential and, if necessary, exception tests are met development should incorporate flood resistant/resilient design features including SUDS and any other measures identified in a site specific FRA to address all sources of flooding.

SA Objective	Assessment			Comments\Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	+	+	+	
2. To facilitate the improved health and wellbeing of the whole population.	++	++	++	

3. To reduce poverty and social exclusion.	NA			
4. To create and maintain safer and more secure communities.	++	++	++	
5. To minimise the harm from flooding.	++	++	++	
6. To improve accessibility to all services and facilities.	NA			
7. To make the best use of previously developed land and existing buildings.	+	+	+	
8. To reduce land contamination and safeguard soil quality and quantity.	NA			
9. To ensure air quality continues to improve.	NA			
10. To reduce noise pollution.	NA			
11. To reduce light pollution.	NA			
12. To maintain and improve the water quality of the region's rivers and groundwater	NA			
13. To conserve and enhance biodiversity within the plan area	NA			
14. To protect and enhance the natural, archaeological, historic environments and cultural assets	NA			
15. To reduce road congestion and the need to travel	NA			
16. To reduce greenhouse gases	NA			
17. To ensure that the District is prepared for the impacts of climate change	+	+	+	
18. Provide for employment opportunities	NA			

19. Make land available to meet the needs of the economy	NA			
20. Support economic growth which is inclusive, innovative and sustainable	NA			
21. To achieve sustainable production and use of resources	NA			
22. To increase energy efficiency of new and existing development.	NA			
23. To increase the production and use of renewable energy.	NA			

Summary: In line withPPS25 this scores positively in regard to social objectives. Applying the sequential test as prescribed in PPS25 scores double positive 2, 4 and 5 in respect of safety and well-being.

Replace existing policy with the following revised policy:

The Council will explore and promote the opportunities for decentralised and renewable or low-carbon energy sources within the Borough, and encourage the progression of suitable schemes through subsequent DPDs.

Implementation
This policy will be implemented through:

- *Further guidance provided as part of the Design & Parking Supplementary Planning Document;*
- *The Council's Carbon Reduction Fund and Strategy;*
- *Monitoring and enforcement of Building Regulation and obligations as set out in binding legal planning agreements;*
- *Consideration and determination of planning applications and appeals;*
- *Implementation of NGP Programme of Development;*
- *Facilitating the development of a local stand alone renewable energy scheme in Redhill and elsewhere as appropriate;*

RAAP and other DPDs/SPDs, which may set out additional financial contributions for specific projects.

SA Objective	Assessment			Comments\Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	NA			
2. To facilitate the improved health and wellbeing of the whole population.	++	++	++	

3. To reduce poverty and social exclusion.	NA			
4. To create and maintain safer and more secure communities.	NA			
5. To minimise the harm from flooding.	NA			
6. To improve accessibility to all services and facilities.	NA			
7. To make the best use of previously developed land and existing buildings.	NA			
8. To reduce land contamination and safeguard soil quality and quantity.	NA			
9. To ensure air quality continues to improve.	++	++	++	
10. To reduce noise pollution.	NA			
11. To reduce light pollution.	NA			
12. To maintain and improve the water quality of the region's rivers and groundwater	NA			
13. To conserve and enhance biodiversity within the plan area	NA			
14. To protect and enhance the natural, archaeological, historic environments and cultural assets	+	+	+	
15. To reduce road congestion and the need to travel	NA			
16. To reduce greenhouse gases	++	++	++	
17. To ensure that the District is prepared for the impacts of climate change	+	+	+	Decentralised schemes
18. Provide for employment opportunities	+	+	+	

SA Objective	Assessment			Comments\Proposed Mitigation
19. Make land available to meet the needs of the economy	NA			
20. Support economic growth which is inclusive, innovative and sustainable	+	+	+	
21. To achieve sustainable production and use of resources	++	++	++	
22. To increase energy efficiency of new and existing development.	NA			
23. To increase the production and use of renewable energy.	++	++	++	

Summary: This scores positively on a number of sustainability objectives: social, environmental and economic.

Page 73, new paragraph 6.23a

The LDF will be informed by ongoing monitoring and assessment of the housing market measured alongside the housing needs of the Borough. These assessments (currently called a Strategic Housing Market Assessment) aid the Council's understanding of the nature and level of housing need and demand for both market and affordable housing. The Assessment considers the supply of homes and compares this to levels of demand to make an assessment of need for different sized properties. This forms the basis for a recommended mix of property sizes that should be encouraged in the Borough to address identified need.   Policy CS13 will be implemented using the current identified housing mix for the Borough which is largely based on the most recent Strategic Housing Market Assessment. Further detailed guidance on implementing the policies about the mix of market housing sought on development sites will be detailed in the Design and Parking SPD. The Affordable Housing SPD will provide details about the mix of affordable housing types sought in the Borough.

Page 73, CS13, Implementation

Add new bullet point

- Affordable Housing Supplementary Planning Document: will provide details about the type of housing unit and the number of bedrooms for affordable housing.

Amended bullet point 3

~~Lifetime Homes~~ Design and Parking Supplementary Planning Document: will provide guidance on the market housing mix required and how this should be provided to meet the housing needs of the Borough i.e. type of dwelling unit and number of bedrooms.

SA Objective	Assessment			Comments\Proposed Mitigation
	Short Term	Medium Term	Long Term	

1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	++	++	++	
2. To facilitate the improved health and wellbeing of the whole population.	+	+	+	
3. To reduce poverty and social exclusion.	+	+	+	
4. To create and maintain safer and more secure communities.	+	+	+	Potentially, from direction in Design and Parking SPD
5. To minimise the harm from flooding.	NA			
6. To improve accessibility to all services and facilities.	NA			
7. To make the best use of previously developed land and existing buildings.	NA			
8. To reduce land contamination and safeguard soil quality and quantity.	NA			
9. To ensure air quality continues to improve.	NA			
10. To reduce noise pollution.	NA			
11. To reduce light pollution.	NA			
12. To maintain and improve the water quality of the region's rivers and groundwater	NA			
13. To conserve and enhance biodiversity within the plan area	NA			
14. To protect and enhance the natural, archaeological, historic environments and cultural assets	NA			
15. To reduce road congestion and the need to travel	NA			
16. To reduce greenhouse gases	NA			
17. To ensure that the District is prepared for the impacts of climate change	NA			

18. Provide for employment opportunities	NA			
19. Make land available to meet the needs of the economy	+	+	+	Housing built at mix determined by housing need then will support economic stability of house building industry
20. Support economic growth which is inclusive, innovative and sustainable	NA			
21. To achieve sustainable production and use of resources	NA			
22. To increase energy efficiency of new and existing development.	NA			
23. To increase the production and use of renewable energy.	NA			

Summary: This scores positively in the social aspects of the SA objectives for example, providing sufficient housing for the needs of the borough, including affordable housing. There are also economic positives in that the type and size of properties will be built according to demand, thereby supporting economic growth in this sector.

Redrafted Policy CS14

1. *During the Plan period 2006 to 15 years from the adoption of the Core Strategy a minimum of x,xxx (to be confirmed) gross new units of affordable housing will be secured within the Borough.*

2. *The mix of affordable housing sizes and types should aim to meet the current assessment of housing need.*

3. *The Council will negotiate to achieve the following provision of affordable housing, taking account of: the mix of affordable housing units proposed and the availability of any additional subsidy, and the overall viability of the proposed development at the time the application is made:*

   a) New housing developments comprising 15 net dwellings or more to provide up to 40 per cent of housing as affordable;

   i) The target tenure mix of affordable housing shall be a minimum of 50 per cent social rented; the remainder to be intermediate affordable housing, usually in the form of shared ownership; and,
   ii) Where existing affordable housing is to be redeveloped as a minimum the same number should be replaced and be consistent with the current affordable housing requirements.

   b) For housing developments of less than 15 net dwellings, a financial contribution towards affordable housing will be sought, so that affordable housing can be provided elsewhere in the Borough. The financial contribution will be equivalent to the cost to the developer of achieving 20 per cent (or 10per cent) affordable housing provision on the application site, including any contribution for a fraction of a dwelling unit;

   i) For developments of 10-14 net dwellings the financial contribution will be equivalent to 20 per cent of the dwellings being provided as affordable dwellings;
   ii) For developments of 1-9 net dwellings the financial contribution will be equivalent to 10 per cent of the dwellings being provided as affordable dwellings;

   4. The Council may consider, in some Regeneration Areas and future site allocations, an alternative level or tenure mix of affordable housing, or alternative provision to achieve a more balanced community.

SA Objective	Assessment			Comments\Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	++	++	++	As identified in the scoping report, there is a shortfall of affordable housing in this borough which this policy seeks to remedy.
2. To facilitate the improved health and wellbeing of the whole population.	NA			
3. To reduce poverty and social exclusion.	NA			
4. To create and maintain safer and more secure communities.	NA			
5. To minimise the harm from flooding.	NA			
6. To improve accessibility to all services and facilities.	NA			
7. To make the best use of previously developed land and existing buildings.	NA			

8. To reduce land contamination and safeguard soil quality and quantity.	NA			
9. To ensure air quality continues to improve.	NA			
10. To reduce noise pollution.	NA			
11. To reduce light pollution.	NA			
12. To maintain and improve the water quality of the region's rivers and groundwater	NA			
13. To conserve and enhance biodiversity within the plan area	NA			
14. To protect and enhance the natural, archaeological, historic environments and cultural assets	NA			
15. To reduce road congestion and the need to travel	NA			
16. To reduce greenhouse gases	NA			
17. To ensure that the District is prepared for the impacts of climate change	NA			
18. Provide for employment opportunities	NA			
19. Make land available to meet the needs of the economy	NA			
20. Support economic growth which is inclusive, innovative and sustainable	+	+	+	
21. To achieve sustainable production and use of resources	NA			

22. To increase energy efficiency of new and existing development.	NA			
23. To increase the production and use of renewable energy.	NA			

Summary: As identified in the scoping report, there is a shortfall of affordable housing in this borough which this policy seeks to remedy. This will have a positive impact on the provision of workers for certain sectors of employment.

Redrafted Policy

***Policy CS15 – Gypsies, Travellers and Travelling Showpeople**

1. Provision will be made by allocations in the DMSA DPD for sites for Gypsies, Travellers and Travelling Showpeople, to meet the pitch requirements to for 15 years from the date of adoption of the Core Strategy. A sequential approach will be taken in identifying suitable sites for allocation in the DMSA DPD, with possible sites within the urban area being considered first, then all other countryside not covered by the Green Belt, and then sites in the Green Belt. Any site considered for allocation must be deliverable (including affordable to its intended occupiers) so as to ensure that needs are met. The lack of any suitable, affordable and deliverable sites in the urban area or other countryside not covered by the Green Belt would provide the very special circumstances necessary to allocate sites in the Green Belt.

2. The following criteria will be used to assess the suitability of sites for allocation in the DMSA DPD and any planning applications for sites not allocated in the DMSA DPD:
a) The site would have safe access to the highway and have adequate parking and turning areas.
b) The site would provide a satisfactory residential environment for its intended occupiers, including space for related business activities where applicable.
c) There is adequate local infrastructure and on site utility services for the number of pitches proposed.
d) The site would not significantly impact on the visual amenity and character of the area or on the amenities of neighbouring land uses.

3. Existing authorised sites for Gypsies, Travellers and Travelling Showpeople will be safeguarded from development which would preclude their continued occupation by these groups, unless the site is no longer required to meet an identified need.

SA Objective	Assessment			*Comments\Proposed Mitigation*
	Short Term	Medium Term	Long Term	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	++	++	++	This policy seeks to accommodate G, T and S on pitches suitable to their needs
2. To facilitate the improved health and wellbeing of the whole population.	NA			
3. To reduce poverty and social exclusion.	+	+	+	This policy considers sites in the urban area first, thereby giving easy access to schools and social facilities

4. To create and maintain safer and more secure communities.	NA			
5. To minimise the harm from flooding.	NA			
6. To improve accessibility to all services and facilities.	+	+	+	This policy considers sites in the urban area first, thereby giving easy access to schools and social facilities. If the pitches had to go on other countryside or Green Belt then this would not score positively.
7. To make the best use of previously developed land and existing buildings.	NA			
8. To reduce land contamination and safeguard soil quality and quantity.	NA			
9. To ensure air quality continues to improve.	NA			
10. To reduce noise pollution.	NA			
11. To reduce light pollution.	NA			
12. To maintain and improve the water quality of the region's rivers and groundwater	NA			
13. To conserve and enhance biodiversity within the plan area	NA			
14. To protect and enhance the natural, archaeological, historic environments and cultural assets	NA			
15. To reduce road congestion and the need to travel	+	+	+	This policy considers sites in the urban area first, thereby giving easy access to schools and social facilities, thereby reducing the need to travel
16. To reduce greenhouse gases	NA			
17. To ensure that the District is prepared for the impacts of climate change	NA			
18. Provide for employment opportunities	+	+	+	The policy considers the provision of space for business activities

19. Make land available to meet the needs of the economy	NA			
20. Support economic growth which is inclusive, innovative and sustainable	NA			
21. To achieve sustainable production and use of resources	NA			
22. To increase energy efficiency of new and existing development.	NA			
23. To increase the production and use of renewable energy.	NA			
Summary: The policy scores positively in considering first urban areas for the sites, thereby giving good access to facilities and services, reducing social exclusion and the need to travel (for everyday use of facilities, schools etc). The policy scores positively against SA objective 18 for considering the provision of space for business needs.				

Outstanding Issues (September 2011)

This was another non-statutory stage of appraisal and the report was published in September 2011. The appraisal and report was produced in-house by Caroline Keogh (Policy Development Officer). The appraisal was only carried out on changes made to the document since the submission version.

The table below shows the proposed changes and the SA commentary on those changes. Following this table are the matrices showing the appraisal carried out on broad locations (summarised in section 6), and the appraisal matrix for the housing numbers, also carried out at this stage.

A range of housing numbers was appraised, in order to determine the sustainability outcomes of delivering a range of housing figures. The range included figures that would give an indication of what the implications for delivering a very high number in response to housing demand, through to a low number that would not fulfil demand but would be easy to accommodate without looking beyond identified SHLAA sites.

Page/Policy/Para (refers to 2009 Core Strategy)	Proposed change	Reason for change	SA / SEA considerations
p18	Insert new table summarising strategic locations for growth (see **Appendix 1**)	New summary table was suggested for inclusion in July 2010 consultation. Outstanding information for summary table now available.	Summary – considerations covered on individual proposed changes. See below.
Valued Landscapes and the Natural Environment			
p23 paras 4.15-4.16	Stretching across all three landscape areas is the Metropolitan Green Belt. Approximately 70% of the Borough is covered by Green Belt designation covering most of the green fabric. In order to be consistent with national and regional policy, the Green Belt needs to be protected; however from time to time it should be reviewed as required. In developing the Core Strategy evidence base, we have concluded that there is no need to change the Green	Updated to reflect latest Strategic Housing Land Availability Assessment findings.	Appraisal has been carried out on the concept of development on Green Belt land, area yet to be determined. The balance between urban intensification and releasing Green belt land

	Belt boundary until at least ~~2016~~ 2021 to meet the planned <u>level of</u> growth. However, ~~depending on future Government housing allocations,~~ it may be necessary to find additional sites in the Borough if insufficient sites arise from within existing built-up areas ~~(ie windfalls to permissions)~~ as identified through the ongoing process of Strategic Housing Land Availability Assessments <u>(SHLAA)</u>. The most sustainable sites to meet this growth ~~may~~ <u>are likely to</u> be found in urban fringe locations where existing built up areas abut the Green Belt <u>and where landscape character is of a lower sensitivity</u>. A Green Belt Review will determine if, and where, this may be the case. <u>The South East Plan identifies that a small scale Green Belt release may be needed adjoining Redhill-Reigate. However, at this stage no decision has been reached about the location of any potential Green Belt release or specific sites.</u> In order to keep the Borough's evidence base relevant and robust, ~~and also to satisfy Government,~~ a comprehensive <u>(borough-wide)</u> Green Belt review will <u>be undertaken which will include consideration of green belt functions, sustainability criteria and landscape sensitivities.</u> ~~place by 2012.~~ The Council views the review as a mechanism to reaffirm, strengthen and validate the areas that need protection, in particular, any strategic, narrow gaps between settlements. <u>The review will inform the identification of specific sites to be safeguarded should a release of Green Belt land be required.</u> ~~In line with Policy SP5 of the emerging RSS,~~ <u>The</u> Council will also consider reviewing the potential for adding to the Green Belt to compensate for any sites that are removed for development. Given that the Green Belt has been such a long-standing designation in the Borough, a review of the boundaries will be good practice in the future to ensure that the transition and relationship of the built up areas and the green fabric are properly considered.	The July 2010 Proposed Changes consultation suggested that para 4.16 be deleted. This consultation suggests it be reinstated but amended. New paragraphs covering waste sites, major developed sites, rural development and green infrastructure, as proposed in the July 2010 consultation, will be included.	has been explored in a sustainability appraisal of broad locations for development, these matrices are following this table. The recommendations from this appraisal are: This scenario has been appraised at a strategic level and not having reference to any particular part of the Borough. If a Green Belt release were to occur then a thorough appraisal of a number of potential sites would need to be undertaken. Any policy would require the use of carefully worded policy that would only trigger the release of MGB land once the supply of PDL has been developed, this is necessary to ensure that urban regeneration is the priority for development; all the while it is feasible. The most accessible locations are going to be sought, which would lead to minimal increases in car miles. A potential negative impact is the loss of soil quantity and quality, particularly if the development was on agricultural land, although care can be taken so as to not irreversibly affect the soil. This development scenario would gain greater sustainability credentials if the scale of the development allowed for supporting

| | | | | infrastructure that would reduce the need for travel such as shops, community and leisure facilities and schools. A large scale development would also increase the potential viability for a CHP scheme. The GI Strategy would need to be in place to inform design for biodiversity and habitat corridors that would need protecting or enhancing through design measures. Design measures are important in minimising the disturbance to the landscape. The development would need to take into account nearby watercourses that could be negatively impacted on by the development. This scenario scores positively in social terms from the benefits of providing sufficient housing, and also in terms of the support to the economy by way of consumers and a flexible labour market.

Recommendations
- Carefully worded triggers to allow MGB to be released only after all PDL is at capacity,
- Locations chosen on accessibility, proximity to public transport, and sensitivity of landscape |

				• Scale of development is considered in order to support other infrastructure necessary to reduce car usage, • Scale of development is considered in order to support CHP, • GIS should inform areas that function as green corridors, and sufficient design recommendations to prevent impacts on biodiversity, • Sequential testing should be used to ensure land in areas of high flood risk are not developed, • Flood risk design measures such as SuDS should be incorporated into all development. • Design measures to limit the impact on the landscape.
p24		**Policy CS1** ….. **3. To maintain a robust and defensible Metropolitan Green Belt within the Borough, the Council will conduct a comprehensive review of the Green Belt** ~~by 2012~~**; such a review taking into account the needs and demands for growth but also the need to protect the green fabric of the Borough and will include opportunities for contraction and replacement Green Belt designation in the event of any contraction to accommodate**		Sub-section retained from previously submitted Core Strategy and updated. Other changes to Policy CS1 consulted upon in	For sustainability considerations relating to possible Green Belt release see above. It is required that a sustainability appraisal (incorporating the requirements of SEA legislation) will be carried out on a Green Belt

		July 2010 will be included, taking into account consultation responses.	review. This will be appraised as part of the DMP SA process.
	growth. …		
Valued People			
p27 paras 4.20-21	There are over ~~132,000~~ 138,000 people living in the borough and some 71,000 people work ~~and seek further education~~ here. ~~On a daily basis there may be tens of thousands~~ Many more people ~~who~~ travel through the Borough to and from London, the south coast and international destinations. ~~It is a busy place with many of us living increasingly pressurised lives. This impacts on the time we have available to look after our health and wellbeing. However, by having options readily available which give more choice to help overcome the difficulties faced by our lifestyles, such as better access to active lifestyles and information about the community facilities and provision on offer, the better the quality of life will be in the Borough.~~ A key theme of the Council's vision is securing community well-being and a healthy population. Residents of Reigate & Banstead ~~As a population Borough residents~~ are generally healthy, affluent and well educated. However, ~~we have areas~~ there are parts of the Borough where people do not share the same advantages as other areas and which have levels of ~~fall below the regional average in terms of~~ income, education attainment and health that are lower than the regional average. ~~This~~ It is important that the Core Strategy ~~must~~ considers the needs of all people, and provides the ~~right~~ opportunities ~~to enable a~~ for vibrant thriving ~~community~~ies where individuals ~~to~~ take personal responsibility for ~~their life and community needs~~ themselves and their neighbours. By understanding local ~~the~~ needs ~~of our individuals~~, and by ensuring that the people who live, work and travel through the Borough have access to the services, information and facilities that allow them to make healthy lifestyle choices, ~~spatial~~ planning ~~policy~~ies can ~~lays~~ the foundation for the Borough to be a better place for those who live, work and learn in it. ~~These~~ Policies will: • Support the Corporate Plan aspiration for an economically prosperous borough, where small and larger businesses thrive. This will include through providing employment land to meet future needs, promoting access to a greater variety and increased number of jobs, and supporting improved access to training and education facilities	Updated for accuracy and clarity and to reflect new Corporate Plan.	No changes to sustainability considerations published in SAR November 2008.

	(including where possible new provision of further and higher education) • Provide positive benefits in areas in need of regeneration; ~~for example, by regenerating parts of Preston to deliver better community facilities and access to services;~~ • Provide for ~~a~~ healthier communit~~y~~ies; for example, through improving access to an established green network throughout the Borough to promote healthier lifestyles in partnership with the Primary Care Trust; • ~~Promote sustained economic prosperity through better tourist amenities, education facilities, access to a greater variety of jobs and increasing the amount of jobs in the Borough; for example, through promoting a new vocational training institution in the Borough or by identifying new employment land to meet future needs in Redhill;~~ • ~~Support improved access to and new provision where possible of, Further and Higher Education institutions.~~		
p28 para 4.24-27	Delete existing text. Replace with: ***Economy and Economic Landscape*** *Reigate & Banstead occupies a strong strategic location for business. It is central to the Gatwick Diamond economic area and falls at the heart of the Coast to Capital Local Enterprise Partnership. It also enjoys excellent transport links to central London, the wider South East, and national and international destinations via the M25, M23/A23 corridor, London to Brighton railway line and Gatwick Airport* *Different parts of the Borough fulfil different economic roles. The north of the Borough is characterised by a small number of stand alone office sites with only a limited amount of other commercial activity. Redhill and Reigate town centres provide the focal point for office activity, particularly in the financial and business services sector, with several successful industrial areas also located here. Industrial estates in Salfords are characterised by larger industrial and warehouse units, whilst Horley is home to a range of smaller office and industrial premises. The southern part of the Borough is characterised by a higher presence of transport, storage and communications businesses. It is important that these different roles are recognised and capitalised on through the Core Strategy (see 'Shaping Places').* *The Borough's economy will continue to be influenced by its location in the Gatwick Diamond functional economic area and its proximity to Gatwick*	Updated to reflect economic evidence base update, changing policy landscape and new Corporate Plan. These changes are intended to supersede the changes consulted on in July 2010.	See appraisal of CS3 Valued People. Also see appraisal of CS4 for sustainability implications of the proposed development hierarchy. Development Management Policies (DMP) will identify designated employment areas and address in more detail the provision of additional employment floorspace, including, as appropriate, identifying specific sites and setting criteria based policies to guide new development – this will be appraised as part of the DMP SA process.

	Airport. The airport is a key driver in the sub-regional regional and national economy, yet associated with its activity are environmental concerns. Reigate & Banstead Borough Council will work closely with partners across the Gatwick Diamond to deliver the vision of the area as an internationally recognised business location with a global future in a sustainable way. The Core Strategy reflects recommendations from key Gatwick Diamond studies about the particular role of Reigate and Banstead in delivering this vision. Recent work has indicated that the planned expansion in passenger numbers at Gatwick Airport will have a negligible impact on direct and indirect employment across adjoining authorities.
	
	The Corporate Plan identifies the importance of regeneration to the improved and sustained economic prosperity of the Borough. It falls to the Core Strategy to balance economic development pressures with securing regeneration aims and sustaining a high quality of life and environment for residents. Economic forecasts for the Borough indicate that recovery from the current economic downturn will occur over the first few years of the plan period; and that future growth (in both output and employment) will be dominated by financial and business services, public sector related services and the distribution, hotel and catering industries. Floorspace forecasts indicate that between 2010 and 2026 demand for industrial floorspace will decline whilst demand for office and distribution/ warehousing floorspace will increase. The Core Strategy therefore needs to provide a framework to:
	
	    • *manage the declining demand for industrial floorspace, and*
	
	    • *secure new provision of office and warehousing floorspace.*
	
	The regeneration focus of the Council, and environmental and policy constraints, means that it is essential to secure the best use of land, including employment land, in line with the development hierarchy set out in Policy CS4. In the majority of cases, redundant industrial space is likely to be appropriate for re-use or redevelopment for alternative employment generating uses. Policies within this Core Strategy set out the broad amount and distribution of floorspace required. Development Management Policies will identify designated employment areas and address in more detail the provision of additional employment floorspace, including, as appropriate, identifying specific sites and setting criteria based policies to guide new development.
	
	Securing a prosperous economy requires new and existing businesses in the Borough to operate efficiently and effectively. This not only depends on		

	employment growth – it also requires businesses to have access to the right type of employment floorspace, the right skills, and to be able to implement 'smarter' or more productive ways of working.		
	a. Choice: The commercial property market currently offers a wide choice of types, sizes and qualities of floorspace. Maintaining this choice for businesses will allow them to expand and maximise their potential: this can be achieved through designation of a range of different types of employment area, and flexible employment policies to ensure that the market is able to respond to changing demands for different types or sizes of premises over the plan period.		
	b. Smart growth: Ensuring best use is made of employment land is a key driver of 'smarter' working, as well as being the most sustainable approach to future development. Small businesses make a vital contribution to the Borough's economy so it is particularly important to secure the conditions and facilities that allow these businesses to survive and growth. Supporting entrepreneurship, especially in the most productive sectors, will also contribute to securing a prosperous economy. Key sectors identified in Reigate & Banstead include financial and business services and distribution and communications. Planning policy can help facilitate the growth of productive small and medium sized businesses by identifying appropriate types and locations for employment floorspace: the wider regeneration measures being implemented will also benefit local businesses.		
	It is recognised that over the course of the Core Strategy period, unanticipated strategic proposals may come forward that would result in a major gain or loss of employment provision. Should this occur, a partial review of economic/employment policies or the production of an Area Action Plan or Supplementary Planning Document may be required.		
P31	**Policy CS3 – Valued People** 1. **The Council will promote and support continued sustainable economic prosperity** ~~growth~~ **and regeneration in Reigate & Banstead by:** a. **Identifying, targeting and working to improve the priority** ~~selected~~ **Regeneration Areas, where development and growth can deliver economic, social and environmental improvements to those areas and the people who live in them** ~~who have fewer advantages than others~~**; in particular raising the profile of Redhill**	Updated to reflect economic evidence base update, changing policy landscape and new Corporate Plan. These changes are intended to supersede the	These changes have been appraised individually and the appraisal matrices can be seen following the broad locations matrices. The considerations arising from this appraisal are: Redhill was deemed an appropriate location to improve as a commercial centre in

| | | changes consulted on in July 2010. | previous drafts. Social and environmental improvements by virtue of regeneration scores positively, this would be particularly favourable if these improvements were coordinated by the Green Infrastructure Strategy and the benefits this would bring in terms of climate change, health and wellbeing, biodiversity etc. Renewable energy/low carbon energy should be considered as part of the regeneration package. Sequential testing is key to guiding development in Redhill; regeneration may give the opportunity to improve flood attenuation in existing areas of flood risk. |

as a commercial location.

b. **Sustaining those areas of the Borough which already prosper by supporting communities and improving infrastructure and community facilities.**

c. **Recognising and nurturing the distinctive economic role of different parts of the Borough and working with adjoining authorities and other partners to maximise the opportunities arising from its position within the Gatwick Diamond, the Coast to Capital Local Enterprise Partnership and its proximity to London.**

d. **Ensuring a range of types and sizes of employment premises to provide for forecast future needs and cater for established, growing and start-up businesses; and ensuring sufficient flexibility to meet the changing needs of existing businesses and attract new businesses.**

e. **Focusing on making the best use of employment land within existing town centres and industrial areas and ensuring that any new employment development outside these areas reflects wider regeneration priorities and is located in accordance with the development hierarchy.**

f. **Supporting entrepreneurship and innovation by facilitating the provision of affordable start-up/incubator units in the most accessible locations.**

g. ~~**Work with partners including Local Authorities, the Regional Development Agency and Government to promote a prosperous Gatwick Diamond within the legal limits established in the Gatwick Airport masterplan**~~

h. ~~**Support existing businesses to ensure their continued success and in particular, develop policies which encourage the retention of, and opportunities for further growth of, Small to Medium-sized Enterprises; and**~~

i. ~~**Identify the sites needed to provide for the future major office and industrial development needs of the Borough.**~~

2. **The Council will:**

a. **Work with partners such as Surrey County Council, the Primary Care Trust and neighbouring authorities to deliver improved**

Community support in addition to facilities scores well in relation to social objectives.

Flexibility of employment premises to meet the needs to existing and attract new businesses will support a buoyant economy in the area. The provision of jobs will support social objectives as well as economic ones.

Best use of employment land in town and industrial areas will reduce pressure on greenfield land which will play positive role in attenuating flood risk; it will also reduce pressure on land for housing. Sequential

	health facilities and access to healthier lifestyles. b. **Work with partners such as Surrey County Council, ~~the Learning and Skills Council~~ skills providers including East Surrey College and neighbouring authorities to promote and deliver improved education facilities and increased education opportunities including support for identifying and developing vocational and skills improvement facilities in the Borough; and** c. **Empower, support and actively work with local communities, as part of the Local Community Action Plan (LCAP) process.** Implementation: This policy will be implemented through: • ~~Sub-regional partnership~~ Cross boundary working, ~~across Gatwick and London Fringe sub-regions~~ including through the Gatwick Diamond Initiative, Coast to Capital Local Enterprise Partnership and Surrey Connects Local Enterprise Partnership, • Partnership working with Surrey County Council, the Primary Care Trust and others to deliver the Sustainable Community Strategy and other shared strategic priorities ~~via the Reigate Partnership and Surrey Strategic partnership also contributing to Local Area Agreement targets~~, including through the Public Sector Board; • ~~New governance arrangements for the Reigate & Banstead Partnership (LSP) in place by 2009~~; • Development Management ~~and Site Allocations~~ Policies Development Plan Document ~~(completed by 2012)~~; • Adopted Planning Obligations and Infrastructure Contributions SPD; • Consideration and determination of planning applications and appeals • Where appropriate, Local Development Orders or other similar mechanisms to promote growth and enterprise at particular locations. • Where appropriate, Area Action Plans or SPD to deal with strategic proposals for the major gain or loss of employment provision or the loss of key employers.		land allocation is vital in directing development to areas of lesser flood risk. Existing industrial areas are not all in areas easily accessible by public transport. Although directing development according to hierarchy will generally be near public transport e.g. town centres. Intensification of existing employment sites/ town centres / regeneration areas may make CHP more viable. Supporting entrepreneurship and innovation by facilitating the provision of affordable start-up/incubator units in the most accessible locations Strongly supports economic growth and social objectives of reducing poverty and social exclusion. The use of LDOs is positive in terms of economic growth and will give opportunities for incorporating flood risk mitigation, energy efficient design, production of renewable energy, sustainable use of resources, and can be directed to accessible and previously developed areas.
Strategic Locations for Growth and Allocation of Development			
p36	**Policy CS4 – Strategic locations for Growth** – delete policy	The July 2010	Policy amalgamated.

		consultation proposed amalgamation of policies CS4 and CS5 and some amendments to text on pages 34-38. The changes proposed here build on those earlier proposed changes.	Appraised under CS4 amendments.
p37 para 5.11-5.14	To meet the land use needs of the Borough to 2026~~7~~, the Council must allocate land for specific uses. Some major development areas have already been ~~effectively allocated~~ identified through the Surrey Structure Plan 2004 ~~or~~ and the Borough Local Plan ~~processes~~ 2005 (i.e. Horley New Neighbourhoods). However, to meet ~~our emerging and~~ the future ~~RSS~~ housing ~~allocations, projected~~ employment ~~demands~~ and retail needs of the Borough, the Council will identify, assess and allocate additional appropriate sites for future development. In allocating land for ~~further~~ future development, the Council will look sequentially across the Borough ~~from the most sustainable locations (ie urban areas) starting at Redhill Town Centre and then to the centres of other urban built-up areas, to the Regeneration Areas and then~~. The first locations that will be considered are the priority locations for growth and regeneration (Redhill Town Centre, Horley Town Centre, Preston and Merstham regeneration areas). Other sustainable locations in town centres will be considered next, followed by other sustainable sites in the existing urban area. A~~as~~ a last resort development opportunities will be identified beyond the edges of urban areas but only where this can be defended as a sustainable urban extension to an existing urban area. This approach will enable the use of existing services and infrastructure, promote the efficient reuse of urban land and ensure that allocated sites are sustainable and consistent with the Council's overarching spatial strategy. Implementing this policy will ensure that allocated sites for development are consistent with the Council's spatial strategy contained in the Core Strategy by promoting sustainable forms of, and sustainable locations for, new development. The	The July 2010 consultation proposed amalgamation of policies CS4 and CS5 and some amendments to text on pages 34-38. The changes proposed here build on the original Core Strategy document and those earlier proposed changes.	Priority locations for growth were considered in the submission appraisal (2009). The sustainability considerations of this can be seen in within this appendix. The submission appraisal highlighted that should housing need require green field sites in the longer term, sustainability considerations would be landscape impact, accessibility and flooding. Policy CS1 makes provision for the protection and enhancement of the green fabric including SAC, AONB, AGLV, SSSIs, common land which will guide any urban extension to an area less sensitive in terms of wildlife and landscape. An extension will have to be sought

	Council has completed a Strategic Housing Land Availability Assessment (SHLAA), an Employment Needs Assessment, a review of economic and employment needs and a Retail Capacity study a retail and leisure needs assessment to support this Core Strategy. These will be reviewed from time to time to keep ensure up-to-date robust information is available for to inform any future site allocations. Sites identified in these studies, and future needs studies or updates, will be further scrutinised against this Core Strategy policyies and subject to a robust Sustainability Appraisal before appropriate choices are made about the allocation of land for development.		sequentially in terms of flood risk and accessibility to public transport and existing infrastructure. Appraisal has been carried out on the concept of development on Green Belt land, area yet to be determined. The balance between urban intensification and releasing Green belt land (sustainable urban extensions) has been explored in a sustainability appraisal of broad locations for development; these matrices are following this table.
p38	**Policy CS45 Allocation of Development** **The Council will allocateion land and direct for development into locations in the sequence set out below and as indicated in Figure 6:** **i. Priority locations for growth and regeneration (all of equal priority):** 　　-　**Redhill Town Centre** 　　-　**Horley Town Centre** 　　-　**Horley North East and North West sectors** 　　-　**Preston Regeneration Area** 　　-　**Merstham Regeneration Area** 　　-　**Other regeneration areas as identified by the Council and its partners.** **ii. Built up areas of Redhill, Reigate, Horley and Banstead:** 　**(i)**　　**Town Centres first, then** 　**(ii)**　　**Edge of centre locations within walking distance to town centres** 　**(iii)**　　**Regeneration Areas: Preston and Merstham** **iii. Other sustainable locations in the existing urban area according to the criteria for sustainability set out in Policy CS9 'Sustainable Development';** **iv. Sustainable urban extensions as identified through subsequent Local Development Documents.**	The July 2010 consultation proposed amalgamation of policies CS4 and CS5 and some amendments to text on pages 34-38. The policy proposed here builds on the original Core Strategy document and those earlier proposed changes.	See above.

	Implementation: This policy will be implemented through:		
	- Development Management ~~and Site Allocations~~ Policies DPD ~~(complete by 2012)~~, which will include policies and site allocations to deliver the Core Strategy, and be informed by the SHLAA, review of employment sites, retail and leisure needs assessment, the Green Infrastructure Strategy, and the SFRA (ensuring development is allocated sequentially in terms of flood risk). ~~Accessibility Strategy~~ ~~Maintaining a robust Strategic Housing Land Availability Assessment~~ ~~Employment Land Review~~ ~~Retail and Leisure Monitoring and Capacity Studies~~ - New Growth Point funding - Legal agreements with the Horley NW and NE sector developers - Horley Master Plan policies in the Borough Local Plan and associated SPDs - Where necessary, Compulsory Purchase Order - Consideration and determination of planning applications and appeals		
Town and Local Centres			
p39-40 para 5.16-5.18	~~The South East Plan identifies Redhill/Reigate as a Primary Regional Centre and as a Regional Hub, as~~ Redhill/Reigate is part of a strategic network which is the prime focus for large scale leisure, office, culture and retail developments. Together, the towns are identified in the South East Plan as a Primary Regional Centre and as a Regional Hub, and Redhill is identified in the Council's Corporate Plan 2011-15 as the borough's growth and transport hub. Redhill Town Centre, already a comparison and convenience goods shopping and leisure destination, is clearly the heart of the transport hub and has the potential to become a more well-connected and vibrant town centre. To deliver these aspirations, the Core Strategy plans to maintain a constant retail market share across the Borough as a whole but, in the short term, to front load the floorspace requirements, and to direct the majority of this retail growth to Redhill. This will have the effect of capturing benefits from inward investment opportunities. In the longer term, as regeneration initiatives progress and on the basis of monitoring information, the scope for Redhill to secure investment at a scale which would permanently alter its market share and enable it to perform an increased	Amended for additional clarity and to reflect the revised retail and leisure evidence base. These changes supersede the minor change consulted upon in July 2010.	No changes to sustainability considerations published in SAR November 2008. Redhill was identified as an area for growth in previous drafts of the CS and appraised as such. The main sustainability considerations from this were: good accessibility from Redhill as a transport hub, with opportunities to enhance cultural assets, heritage and sense of place within the urban area. Consideration to flood issues must be paramount on

	market function will be assessed. Although joined with the wider transport hub, Reigate Town Centre is distinctly separate and also functions as a comparison, convenience and food and drink destination. ~~with the centre's~~ Its strengths are its ~~valued character, historic buildings and~~ range of independent and specialist shops, along with its valued character and historic buildings, which constrain future development in the town. ~~However, future development in Reigate is constrained by its historic nature.~~ Elsewhere in the Borough a. ~~Similarly,~~ Banstead Village Centre performs a convenience role for its local catchment. b. Horley Town Centre performs a service and convenience role for its local area, and is the subject of regeneration plans to improve facilities to accommodate for increased demand from the planned new neighbourhoods. Alongside these town centres ~~there~~ is ~~an identified wider~~ network of smaller Local Centres. These local centres ~~provide a role~~ sit lower down in the hierarchy and provide for more local needs. ~~and either currently offer, or should be the focus for investment in,~~ Particularly in more deprived areas, they should provide the focus for the provision of ~~more~~ accessible local services such as health centres and other small-scale community facilities. ~~This can be particularly important in deprived areas, which often have poor access other than by car to local shops and services. The current Town and Local Centres are identified on the Key Diagram, with new Neighbourhood Centres designated in each of the new sectors in Horley and the potential regeneration proposals in Preston and Merstham providing a focus for community and retail uses.~~ The Retail & Leisure Needs Update Study for the Borough identifies that an additional 25,841sqm of comparison floorspace and 11,652sqm of convenience floorspace will be needed to 2027 across the borough. To reflect the objective of frontloading retail growth in Redhill, the majority of both convenience and comparison floorspace will be accommodated in Redhill. In the other town and local centres, more limited growth will ensure these centres retain their current roles. Detailed policies for, and the precise extent of, town and local centres will be included in the Development Management Policies DPD and the Redhill Town Centre Area Action Plan. In priority areas, the Council will work with the local community and retailers to identify opportunities to remedy deficiencies in local provision. ~~, which would complement the Council's approach to regeneration.~~ It is particularly important ~~vital that the Council continues to ensure~~ that any significant new areas of housing should make provision for local retail outlets. ~~The Council's~~		assessing locations for development in Redhill. See also appraisal for each area of Borough following the broad locations matrices. The acknowledgement of the restraint the character and historic buildings has on development would score positively under objective 14. The focus of accessible services into areas of relative deprivation scores highly across the social objectives.

	~~Corporate Plan Corporate Plan 2006-2009, Caring for our Local Environment outlines a programme of improvement works in the identified local and village shopping parades, building on local residents and traders views. These are implemented in co-ordination with the County Council's scheduled road improvements. Examples of works include footway resurfacing, parking improvements, improving/renewing street furniture, and installing new mini recycling sites.~~		

p41	**Policy CS6 – Town and Local Centres**
	
	1. The multi-purpose role of primary, town and local centres will be retained and improved through the provision of the majority of retail, social, community, housing and leisure uses in these centres at a scale appropriate to their role.
	
	a. The majority of comparison <u>and convenience</u> retail growth to meet the strategic needs of the Borough and beyond, as reflected in the RSS, will be accommodated in Redhill Town Centre.
	
	2. <u>b.</u> Only limited growth is expected for all other centres with no changes anticipated to the functional role of any of these centres <u>to that</u> ~~as~~ defined ~~in this policy~~ <u>below</u>.
	
	3.<u>2.</u> The Borough's ~~has a~~ hierarchy of Town Centres <u>is as follows:</u> ~~as listed below under their relative functions:~~
	
	<u>a.</u> Primary Town Centre: Redhill has the role of a Regional Hub, as part of a strategic network, which is the prime focus for large-scale leisure, office, culture and retail uses and developments.
	
	<u>b.</u> Town Centres: These are vital and viable centres for our built-up areas, which are key to facilitating and promoting sustainable and inclusive patterns of development. ~~It is important to enhance~~ Customer choice <u>will be enhanced</u> by making provision for a range of services and <u>improving</u>~~e~~ accessibility: ~~to them. For the purpose of the Core Strategy, Town Centres include:~~
	
	   • **Reigate Town Centre;**
	   • **Horley Town Centre;**
	   • **Banstead Village Town Centre.**
	
	<u>c.</u> Local Centres: These local centres provide a role lower down in the hierarchy for more local needs and either offer now, or should be the focus for investment in, more accessible local services.
	
	~~For the purpose of the Core Strategy, Local Centres include:~~
		Amended for additional clarity and to reflect the revised retail and leisure evidence base. These changes sit alongside the minor change consulted upon in July 2010.
		
		List of local centres deleted as this sits more appropriately in the Development Management Policies Document.
			No changes to sustainability considerations published in SAR November 2008.

	~~Burgh Heath; Drift Bridge; Lower Kingswood; Nork Way; Shelvers Way; Marbles Way, Station Approach Chipstead; Tadworth; Tattenham Corner; Walton on the Hill; Lesbourne Road; Woodhatch; Linkfield Corner; Merstham Village; Nutfield Road; Portland Drive, Merstham (subject to regeneration improvements); Brighton Road, Salfords; Brighton Road, Horley; Meath Green Lane, Horley and Langshott (when built as part of the NW sector new neighbourhood)/Lake Lane, Horley (when built as part of the NE sector new neighbourhood) as identified on the Key Diagram.~~ Implementation: This policy will be implemented through: • Monitoring of the health of town centres ~~in line with PPS6~~; • Consideration and determination of planning applications and appeals; • ~~Rolling improvement programme for local shopping centres and village parades through the Corporate Plan in partnership with Surrey County Council;~~ • Legal Agreements with the NW and NE sector developer • Horley Master Plan policies in the Local Plan<u>.</u> ~~and~~ associated SPD's. • The ~~emerging~~ Redhill <u>Town Centre</u> Area Action Plan ~~(to be completed by 2010)~~; • Development Management <u>Policies</u> ~~and Allocations~~ Development Plan Document.		
Shaping Places			
Area 1 – The North Downs			
p44	1. Housing: Banstead village is a small centre serving mostly local needs with moderate public transport accessibility. As a result of ~~analysis of~~ a number of factors it is not identified as a strategic location for high growth levels or high density housing growth. ~~The o~~Other settlements in the area have fewer services and lower transport accessibility <u>than Banstead</u>. These smaller settlements generally have low potential for accommodating high levels of growth. Collectively, the settlements will provide for <u>at least</u> ~~approximately~~ ~~1,730~~ <u>845</u> residential units <u>for the period 2011-2021. Beyond 2021, additional housing growth will be delivered in one or more broad locations across the borough.</u> Housing will primarily be for families and delivered on smaller sites on a windfall basis, or through small-site allocations. Specific sites identified by the Council will be allocated <u>through the Development Management Policies DPD</u>	Text updated to reflect latest evidence on housing, employment and retail. In July 2010 it was suggested that para 5 be	See full appraisal matrices of each area following the broad locations matrices. The main sustainability appraisal outcomes are: Planned regeneration and the intensification and re-use of employment land in this area presents opportunities for energy efficiency measures and renewable energy

and development density and type will be informed by local character and need. ~~Opportunities for further residential development may emerge as part of the Council"s Development Management and Site Allocation DPD (DMSADPD), scheduled for completion in 2012.~~ 2. Employment: This area has ~~two designated employment areas~~<u>limited employment provision, focused at</u> Waterhouse Lane and Pitwood Park <u>and a small number of single owner office sites</u>. <u>No major new employment development is planned for this area, although Waterhouse Lane and Pitwood Park</u> ~~Both of these locations~~ <u>both show some</u> ~~have the~~ potential <u>for intensification subject to the preservation of the character of surrounding areas</u> ~~to increase employment floorspace through intensification to help meet the employment needs of the Borough over the Plan period. Specific additional employment floorspace levels will be allocated as determined appropriate through the DMSADPD.~~ <u>Development Management Policies will confirm employment land designations for this area. For monitoring purposes, a target of up to 2,000sqm has been identified for Area 1</u>. 3. Retail: Banstead provides for the local shopping needs of the area and is one of the three town centre locations in the Borough. There is a need over the life of this Strategy for minor expansion of the convenience and comparison floorspace for Banstead Town Centre. It is anticipated this will be reviewed regularly over the Plan period to ensure that the centre <u>maintains its position in the retail hierarchy and</u> fulfils its role as the principal town centre location for the area. 4. Regeneration: Preston is the focus for regeneration in this area. As a designated Regeneration Area in the Council's NGP Programme of Development, a variety of social, economic and environmental improvements will be made. Working with our partners Raven Housing Trust and Surrey County Council, an estimated ~~400~~ <u>510</u> housing units will be delivered by 20<u>21</u>~~16~~. Further opportunities for improved community and leisure facilities are envisaged as part of this regeneration programme. 5. Future Expansion Potential: ~~The emerging RSS (Secretary of State's response) directs that a Green Belt Review may be needed around Redhill to accommodate higher housing allocations. The Council will undertake a Green Belt Review for the whole area of the Borough, including Area 1.~~ In Area 1, the Green Belt is constrained and forms a vital strategic gap between the outer suburbs of London and the towns and settlements beyond. It is anticipated that the urban areas in Area 1 will not experience expansion beyond small-scale re-use and consolidation of sites in the built up area during the life of the Strategy<u>, however specific site allocations will be informed by a borough-wide Green Belt Review</u>.	deleted and replaced by updated text in section 4 (para 4.16), however some reference to future expansion potential is now considered important on the basis of the emerging evidence. A proposed new paragraph about infrastructure (as outlined in the July 2010 consultation document) is included.	improvements. Improvements to public transport score positively against economic and environmental objectives, and are particularly advantageous for social inclusion. Demand for travel can be reduced through the provision of leisure and community facilities; however this is not coupled with an increase in local employment opportunities which would benefit this objective. The lower housing figure in this area scores negatively against the objective of housing provision, however this is in line with the planned spatial pattern of housing development across the Borough and the concept of housing provision in more accessible locations. The limited employment growth in the area scores negatively against economic objectives, and if improved would give additional sustainability credentials to the social impacts of the PPF. The planned intensification of existing employment land rather than developing new areas for employment is in line with the planned spatial pattern of development across the Borough, and the protection of landscape and nature

	6. Infrastructure: Infrastructure requirements in this area are generally based upon improving existing infrastructure and ensuring that development is directed to locations that are already well served by existing services or those that can be upgraded. Traffic congestion will be addressed through the improvement of alternative transport options to reduce the need to use the car. The regeneration of Preston requires the improvement of infrastructure to meet the needs of the existing residents and new infrastructure to meet the needs of new development. A comprehensive redevelopment including the provision of a focus "community hub" is proposed to meet most of these requirements.		conservation areas; this approach scores favourably against environmental objectives. With regards to the concept of a Green Belt review, the specific location would be appraised if and when it is selected. With regards to the concept of a Green Belt review, the specific location would be appraised if and when it is selected. At this stage the broad concept of developing in a Green Belt location (which could be anywhere in the Borough) has been appraised and full matrix of results can be seen following this table.
p45	**Policy CS7: Area 1** *Insert new tables*	Policy restructured as proposed in July 2010 consultation. Outstanding information now inserted.	See above

Policy CS7: Area 1 table:

Development type	Locations (Policy CS4)	Amount	How these sites will be allocated/delivered
Housing*	*Preston Regeneration Area*	*540*	*Policies and allocations in the DMP*
	Large sites with permission in the urban area	*204*	*To be delivered under saved policies in the BLP until policies in the DMP replace these.*
	Other sites in the urban area with permission	*61*	
	Other sites in the urban area as identified through the SHLAA	*40*	
	Total housing units	**845**	
Employment	*Employment*	*Up to*	*Existing employment*

	development will be accommodated through intensification and re-use of existing employment sites.	*2,000sqm*	*allocations will be reviewed through the DMP and policies included to encourage intensification and re-use of employment land.*
Retail	*Limited additional retail floorspace will be developed in Banstead to ensure it maintains its current role.*		*Existing retail allocations and policies in the BLP will be reviewed and considered for inclusion in the DMP.*

* In addition to these figures, beyond 2021, housing growth will be delivered in one or more broad locations across the borough.

Infrastructure Priorities			
Scheme	*Purpose*	*Target date/trigger*	*Policy provision*
New leisure and community hub facility (Preston Regeneration Area).	*To address the leisure and community facilities deficit in Preston to meet the needs of the existing and future population.*	*Early provision required to meet the needs of the existing community and promote regeneration initiatives.*	*CS policy: Valued People.* *CS policy: Infrastructure.* *DMP policies and allocations.*
Transport improvements in and around Preston Regeneration Area.	*To accommodate transport demand from new development.*	*When development occurs.*	*CS policy: Infrastructure.* *CS policy: Travel options/accessibility.* *DMP policies and allocations.*
Highway improvements to A217/A240 junction.	*To increase key junction capacity.*	*Early provision required to meet the needs of the existing community and*	*CS policy: Infrastructure.* *CS policy: Travel options/accessibility.* *DMP policies and*

Infrastructure table revised from that consulted on in July 2010, reflecting latest Infrastructure Delivery Plan. Further work in being undertaken to more fully understand the transport implications of growth.

			promote regeneration initiatives.	allocations.		

Area 2a – The Wealden Greensand Ridge: Redhill

p48	Regeneration proposals for Redhill Town Centre will be addressed through the Redhill Town Centre Area Action Plan. The likely extent of the AAP is indicated in figure X although may be subject to change as the document is prepared. The Town Centre boundary for Redhill will also be defined in the AAP, along with site specific allocations for the Town Centre. The definition of all other Town Centre boundaries and identification of site specific allocations elsewhere in the Borough will be set out in the Development Management Policies DPD.	Text updated to reflect latest evidence on housing, employment and retail and leisure, as well as work to inform the emerging Redhill Town Centre Area Action Plan.	See full appraisal matrices of each area following the broad locations matrices. The main sustainability appraisal outcomes are:

Development Proposed:

1. Housing: Redhill Town Centre ~~will~~ has the potential to provide ~~for 1000~~ up to 750 new housing units between 2011 and 2021. Almost all of these will be high-density units associated with ~~four major mixed-use development~~ opportunity sites to be allocated in the Redhill Town Centre Area Action Plan~~: the Redhill Train Station; Cromwell Road; Marketfield Way; and, and at Colebrook (Noke Drive and St Annes Drive). Opportunities for further residential development may emerge as part of the Area Action Plan programme, or the Council's first site allocation process due for completion in 2012.~~ It is anticipated that an additional ~~2750~~ 490 units will be constructed in the built-up areas of Area 2a ~~Redhill~~ over the Plan period to 202~~1~~6. These units will be delivered either as part of the ~~current Park 25 and~~ Holmethorpe Watercolour development~~s~~, as part of the Merstham regeneration proposals or through specific ~~small~~ site allocations ~~once~~ in the DMP~~SADPD is complete in 2012, or through windfall sites, which arise through the life of the Strategy. Working with our partner, Surrey County Council, an identified 100 units will be delivered in Merstham *Regeneration Area* by 2012~~ Beyond 2021, additional housing growth will be delivered in one or more broad locations across the borough.

2. Employment: As the main urban centre in the Borough and a centre for significant change*,* Redhill will be a focus for employment development, with the Town Centre being a ~~the~~ key location for additional office space of up to 7,000sqm (net) to enhance the role of Redhill as a commercial destination. ~~The Council has identified a need for an additional 2 ha of office employment land over the Plan period for the whole of the Borough. Whilst some of this will be specifically allocated to Redhill in the Area Action Plan, or through the DMSADPD, this is not expected to be significant.~~ There are also a number of other employment areas in Area 2a – these offer some potential for reuse/intensification for other commercial uses. Sites for

In July 2010 it was suggested that para 5 be deleted and replaced by updated text in section 4 (para 4.16), however some reference to future expansion potential is now considered important on the basis of

With regards to the concept of a Green Belt review, the specific location would be appraised if and when it is selected. At this stage the broad concept of developing in a Green Belt location has been appraised and full matrix of results can be seen following this table. There is no change in the overall strategy of urban intensification in the area and the hierarchy of towns placing Redhill at the top, this has been appraised and can be seen in the submission SAR (2009). This appraisal highlighted concerns of flooding, noise, light and green space which are to be addressed specifically in the RAAP through design. The approach for this area scored positively in terms of congestion, reduction of travel (and associated pollution), use of PDL, and across all economic and energy/resource

	office development within, and an indicative job target for, Redhill Town Centre will be identified through the AAP process. The Development Management Policies DPD will confirm employment designations elsewhere in Area 2a. For monitoring purposes, a target of 12,500sqm of employment floorspace has been identified for Area 2a and Area 2b together (excluding Redhill Town Centre).	the emerging evidence.	objectives. The issue of habitat creation in the urban area needs to be addressed in policy CS2.
	3. Retail: As a primary shopping centre, Redhill caters for local needs and Borough-wide needs. ~~Retail and Leisure Needs Assessment 2007. It is anticipated these figures will be reviewed frequently to ensure that the centre has the best opportunity for regeneration and for fulfilling its role as a Primary Shopping Centre for the Borough and beyond.~~ As outlined above, the majority of both comparison and convenience retail development in the Borough will be accommodated in Redhill. The AAP will plan for and allocate sites to provide the identified additional retail floorspace. Retail provision figures will be reviewed regularly to ensure opportunities for regeneration within the Town Centre – and Redhill's potential as a primary shopping centre for the Borough and beyond – are realised. To support the development of Redhill's regional role, other complementary uses, such as leisure, need to be delivered. The RAAP will set out the amount and type of leisure provision required in the town centre.	A proposed new paragraph about infrastructure (as outlined in the July 2010 consultation document) is included.	The RAAP will deal with, and be appraised for amount and type of leisure provision, site specific allocations, town centre boundary, regeneration proposals, sites for office development, indicative job target in Redhill, identify additional retail floorspace.
	4. Regeneration: Redhill Town Centre and Merstham have been identified as Regeneration Areas. ~~Further opportunities for improved community facilities are also envisaged as part of the Council's *Programme of Development*.~~ The regeneration of Redhill is linked to its status as a centre for significant change and its role as a hub with its strong transport connections. The regeneration of Redhill will result in population growth alongside employment, retail and cultural development in a highly accessible location with a strong economic base. There is the opportunity to generate significant jobs and training opportunities to help benefit the local community. ~~The development will involve innovative environmental design and public realm improvements as well as sustainable development initiatives such as a local stand alone renewable energy scheme.~~ The regeneration of Merstham, which is seeking to include a new community hub, will involve working with other organisations and local groups to improve the physical environment and tackle social problems.		
	5. Future expansion potential: ~~The emerging RSS (Secretary of State's response) directs that a Green Belt Review may be needed around Redhill to accommodate higher housing allocations.~~ It may be necessary to find additional sites for housing if insufficient sites arise from within existing built-up areas, however, at this stage no decision has been reached about the location of any potential Green Belt release or specific sites. The Council will undertake a Green Belt Review for the whole area of		

	the Borough, ~~including Redhill by 2012 as part of the Development Management and Site Allocation DPD process~~. This review will determine <u>whether – should it be required - small scale of Green Belt around Redhill would be appropriate.</u> ~~if there is capability,~~ and ~~sufficient capacity for future growth.~~ <u>6. Infrastructure: Infrastructure requirements in this area are generally based upon existing infrastructure and ensuring development is directed to locations that are already well served by existing services or those that can be upgraded. Redhill will require some key improvements to the transport infrastructure, flood attenuation works and relocation of essential community facilities to ensure the Town Centre fulfils its potential. The AAP will plan for, and identify funding sources to deliver, the necessary infrastructure. The infrastructure required for Merstham regeneration area will primarily take the form of a new community hub. The Development Management Policies DPD will provide further detail on the infrastructure proposals for elsewhere in the area.</u>				

p51	**Policy CS7: Area 2(a)** *Insert new tables*				Policy restructured as proposed in July 2010 consultation. Outstanding information now inserted.	See above

Development type	Locations (Policy CS4)	Amount	How these sites will be allocated/delivered
Housing*	*Redhill Town Centre (sites without permission)*	*542*	*To be delivered under saved policies in the BLP until policies in the RAAP replace these.*
	Merstham Regeneration Area	*38*	*To be delivered under saved policies in the BLP until policies in the RAAP and/or DMP replace these.*
	Large sites with permission in the urban area	*459*	
	Other sites in the urban area with permission	*86*	
	Other sites in the urban area as identified through the SHLAA	*114*	
	Total housing units	*1,239*	
Employment	*Significant jobs and training opportunities*	*Up to 7,000sqm*	*Existing employment allocations will be reviewed*

| | | office space | through the RAAP and DMP and policies included to encourage intensification and re-use of employment land. | |
| *Retail* | *Significant retail growth in Redhill will contribute to the town centre increasing its market share for both comparison and convenience goods.* | | *Existing retail allocations and policies in the Borough Local Plan will be reviewed and considered for inclusion in the RAAP.* | |

* <u>In addition to these figures, beyond 2021, housing growth will be delivered in one or more broad locations across the borough.</u>

Infrastructure Priorities				
Scheme	***Purpose***	***Target date/trigger***	***Policy provision***	
Redhill Town Centre AAP Area				
Flood attenuation works upstream of Redhill Town Centre in Memorial Park.	*To mitigate risk of downstream flooding.*	*Early provision is required to promote regeneration initiatives.*	*Redhill Town Centre AAP.*	
Major traffic improvements and management measures in Redhill Town Centre	*To support the role of Redhill Town Centre as a transport hub and to accommodate increased development.*	*Early provision is required to promote regeneration initiatives.*	*CS policy: Infrastructure. CS policy: Travel options/accessibility. Redhill Town Centre AAP.*	Infrastructure table revised from that consulted on in July 2010, reflecting latest Infrastructure Delivery Plan. Further work in being undertaken to more fully

		Relocation of community facilities from Cromwell Road	*To enable the redevelopment of the Cromwell Road site to support the role of Redhill Town Centre.*	*When development occurs.*	*CS policy: Valued People.* *CS policy: Infrastructure.* *Redhill Town Centre AAP.*	understand the transport implications of growth.	
		Rest of Area 2(a)					
		New 2-form entry primary school	*To accommodate increase in primary school numbers due to increase arising from recent and future development.*	*2013*	*CS policy: Valued People.* *CS policy: Infrastructure.* *DMP policies and allocations.*		
		New 6-form entry secondary school	*To accommodate forecast increase in secondary school numbers due to natural increase and increase arising from recent and future development.*	*2017*	*CS policy: Valued People.* *CS policy: Infrastructure.* *DMP policies and allocations.*		
		Expansion of existing primary schools in Redhill/Reigate area – at least 1-form entry.	*To accommodate increase in primary school numbers dues to increase arising from recent and future development.*	*2012*	*Borough Local Plan policies.* *CS policy: Valued People.* *CS policy: Infrastructure.*		
		Merstham Community Hub.	*To provide a focus for community services and*	*Early provision is required to meet the needs of the existing*	*CS policy: Valued People.* *CS policy: Infrastructure.*		

		activities.	*community and promote regeneration initiatives.*	*DMP policies and allocations.*	
	Earlswood Depot waste processing facility	*To provide capacity to process food waste and increase in dry recyclables*	*2012*	*Borough Local Plan policies.* *CS policy: Infrastructure.*	
	Merstham Sewage Treatment Works	*To increase sewage treatment capacity*	*Early provision required to facilitate new development in Redhill/Merstham area.*	*CS policy: Infrastructure.*	

Area 2b – The Wealden Greensand Ridge: Reigate and the remainder of Area 2

p54	1. Housing: Reigate and the rest of the urban area will provide for ~~775~~ 253 new housing units between 2011 and 2021. ~~by 2026~~. The priority will be for these to . ~~All of these will~~ be built in the existing built-up area in varying densities according to local character and accessibility. Reigate Town Centre, although identified as a sustainable location, is constrained by its designation as a conservation area, so has only limited development potential ~~is possible~~. Beyond 2021, additional housing growth will be delivered in one or more broad locations across the borough. 2. Employment: Reigate is a strategically important employment location in the Borough particularly for office uses. There is some scope within the Town Centre for intensification of office uses, subject to the constraints of the Conservation Area designation. Elsewhere in the Area there is a limited amount of employment land, again with some limited scope for reuse and intensification for commercial uses. ~~The Council has identified a need for an additional 2 hectares of employment land across the Borough over the Plan period. Whilst some of this may be specifically allocated to Reigate through the DMSADPD, this is not expected to be significant.~~ Development Management Policies will confirm employment land designations for this area. For monitoring purposes, a target of 12,500sqm of employment floorspace has been identified for Area 2a and Area 2b together (excluding Redhill Town Centre). 3. Retail: As a town centre location, Reigate caters for local needs and some Borough-wide needs. It is a pleasant and unique town centre that has been shaped	Text updated to reflect latest evidence on housing, employment and retail. In July 2010 it was suggested that para 5 be deleted and replaced by updated text in section 4 (para 4.16), however some reference to future	See full appraisal matrices of each area following the broad locations matrices. The main sustainability appraisal outcomes are: With regards to the concept of a Green Belt review, the specific location would be appraised if and when it is selected. At this stage the broad concept of developing in a Green Belt location has been appraised and full matrix of results can be seen following this table. There is no change in the overall strategy of development for the area and the hierarchy of towns, this has been appraised and can be seen in the submission SAR

	by its historic buildings and future growth will be limited by its conservation area designation. The retail area is characterised by small units and studies reveal that there is limited potential for retail growth. Also, the retail units will remain small as there is the limited potential for amalgamation due to the conservation area designation. Therefore, Reigate will continue to serve as a boutique location for small specialist ~~type~~ shops. The retai~~ling~~ <u>offer</u> is complemented by the location of Priory Park, and the large number of offices that provide the opportunity for shared trips from workers or visitors to these locations. 4. Regeneration: The regeneration of Priory Park was completed in 2008 and is now an established focal point for the area. Further opportunities for linkages to and from Priory Park will be identified through the Green Infrastructure Strategy. 5. Future expansion potential: ~~The emerging RSS (Secretary of State's response) directs that a Green Belt Review may be needed around Redhill to accommodate higher housing allocations.~~ <u>It may be necessary to find additional sites for housing if insufficient sites arise from within existing built-up areas, however, at this stage no decision has been reached about the location of any potential Green Belt release or specific sites.</u> The Council will undertake a Green Belt Review for the whole area of the Borough, ~~including Reigate by 2012 as part of the Development Management and Site Allocation DPD process~~. This review will determine <u>whether – should it be required - small scale of Green Belt around Reigate would be appropriate.</u> ~~if there is capability,~~ <u>and</u> ~~sufficient capacity for future growth.~~ <u>6. Infrastructure: Infrastructure requirements in this area are generally based upon improving existing infrastructure and ensuring that development is directed to locations that are already well served by existing services or those that can be upgraded. Traffic congestion will be addressed through the improvement of alternative transport options to reduce the need to use the car.</u>	expansion potential is now considered important on the basis of the emerging evidence. A proposed new paragraph about infrastructure (as outlined in the July 2010 consultation document) is inserted.	(2009). The intensification of office use scores positively in terms of use of previously developed land but is not making land available for the needs of the economy. This approach follows the overall strategy of directing development to areas well served by existing services or those that can be upgraded and scores well under the objectives of air quality and reducing the need to travel.
p55	**Policy CS7: Area 2(b)** *Insert new tables*	Policy restructured as proposed in July 2010 consultation. Outstanding information now inserted.	See above

Policy CS7: Area 2(b) table:

Development type	Locations (Policy CS4)	Amount	How these sites will be allocated/delivered
Housing*	*Large sites with permission in the urban area*	*146*	*To be delivered under saved policies in the BLP until policies in the DMP replace these.*
	Other sites in the urban area with permission	*71*	
	Other sites in the	*36*	

		urban area as identified through the SHLAA				
		Total housing units	**253**			
	Employment	*Employment development will be accommodated through intensification and re-use of existing employment sites.*		*Existing employment allocations will be reviewed through the DMP and policies included to encourage intensification and re-use of employment land.*		
		Additional commercial floorspace across Area 2a (excluding Redhill Town Centre) and Area 2b	*Up to 12,500sqm*			
	Retail	*Limited additional retail floorspace will be developed to ensure Reigate maintains its current role.*		*Existing retail allocations and policies in the BLP will be reviewed and considered for inclusion in the DMP.*		

* <u>In addition to these figures, beyond 2021, housing growth will be delivered in one or more broad locations across the borough.</u>

Infrastructure Priorities

Scheme	*Purpose*	*Target date/trigger*	*Policy provision*
Expansion of existing primary schools in Redhill/Reigate area – at least 1-form entry.	*To accommodate increase in primary school numbers dues to increase arising from recent and future development.*	*2012*	*Borough Local Plan policies. CS policy: Valued People. CS policy: Infrastructure.*

Infrastructure table revised from that consulted on in July 2010, reflecting latest Infrastructure Delivery Plan. Further work

	Expansion of water treatment works at reservoir outside the Borough (NB this requirement for development across the Borough).	*To ensure water supply throughout plan period.*	*Third phase planned 2015-2020.*	*CS Policy: Sustainable Development CS Policy: Infrastructure.*	in being undertaken to more fully understand the transport implications of growth.	
Area 3 – Low Weald						
p58	1. Housing: Horley will provide for ~~3,000~~ 2,200new housing units <u>between 2011 and 2021</u> ~~by 2026~~. The majority of development will be in the two planned new neighbourhoods to the north-east and north-west of the town. ~~In line with the town centre regeneration proposals, and to encourage an active town centre, it is estimated 285 housing units will be delivered up to 2026~~<u>7</u> ~~in the town centre as part of mixed-use development schemes.~~ <u>Beyond 2021, the North West sector will be completed: in addition housing growth will be delivered in one or more broad locations across the borough.</u> 2. Employment: There are <u>two distinct employment sub-areas within Area 3: the Salfords industrial areas, which provide a range of mostly larger light industrial and warehousing space, and the Horley areas, which provide smaller units accommodating a range of uses.</u> ~~four employment areas in this Area, which are all served by good transport links and by the local bus routes to Horley train station. The employment areas are: two areas for small business and an industrial estate on Balcombe Road in Horley and the industrial estate in Salfords on the A23 Brighton Road. The Council has identified a need for an additional 2 ha of employment land over the Plan period.~~ <u>Development Management Policies will confirm employment land designations for this area. For monitoring purposes, a target of 24,000sqm of employment floorspace has been identified for Area 3. Start up units of small to medium size will be directed to the Horley area through policies in the DMPDPD and site allocations.</u> 3. Retail: Horley town centre is the focal point for retailing in this area and acts as a local convenience shopping centre. Studies indicate there is a need over the life of the Strategy to ensure that the retail offer is expanded to meet the shopping needs of the growing catchment population. Some additional A1 and A3 floorspace will be required to support the regeneration of the town centre and prevent further out-of-	Text updated to reflect latest evidence on housing, employment and retail. In July 2010 it was suggested that para 5 be deleted and replaced by updated text in section 4 (para 4.16), however some reference to future expansion potential is now considered important on the basis of	See full appraisal matrices of each area following the broad locations matrices. The main sustainability appraisal outcomes are: There are no significant changes to the development planned for Horley from the submission version SAR (2009) with most housing directed to the new sectors. With regards to the concept of a Green Belt review, the specific location would be appraised if and when it is selected. At this stage the broad concept of developing in a Green Belt location has been appraised and full matrix of results can be seen following this table. Sequential testing must be used to determine any possible Green Belt release in the area so as to avoid any areas at risk from flooding. This approach

	town development and this will be secured through the redevelopment of a number of key town centre sites; however, significant levels of additional retail space are not planned at this time. ~~There are particular opportunities to incorporate retail as part of sites in public ownership including Newman House.~~ 4. Regeneration: The Council has designated Horley as a priority Regeneration Area as part of the NGP initiative due to the scale of planned residential growth in the two new neighbourhoods and the comprehensive approach to delivery of associated infrastructure, and, the linked regeneration of the Town Centre. 5. Future expansion potential: Horley is the largest built-up area in Area 3 and once the new neighbourhoods are developed there will be little scope for further expansion due to the flooding, and noise and air quality constraint areas adjacent to the town. <u>The Council will undertake a Green Belt Review for the whole area of the Borough, including Area 3.</u> ~~The Council's Green Belt Review of the Borough will consider other development areas including the employment areas at Salfords as part of the DMSADPD process.~~ This review will determine <u>whether – should it be required – small scale release of Green Belt adjoining the urban area in Area 3 would be appropriate</u> ~~if there is capability, and sufficient capacity, for future growth demands resulting from the emerging RSS housing and employment allocations.~~ <u>6. Infrastructure: Infrastructure requirements in this area are generally based upon improving existing infrastructure and ensuring that development is directed to locations that are already well served by existing services or those that can be upgraded. Traffic congestion will be addressed through the improvement of alternative transport options to reduce the need to use the car. There is a comprehensive plan to provide new infrastructure to meet the needs of the development in the planned new neighbourhoods in the North East and North West sectors.</u>	the emerging evidence. A proposed new paragraph about infrastructure (as outlined in the July 2010 consultation document) is included.	scores positively in terms of economic and energy/resource objectives in addition to reducing the need to travel.
p59	**Policy CS7: Area 3** *Insert new tables* 	***Development type***	***Locations (Policy CS4)***	***Amount***	***How these sites will be allocated/delivered***
Housing*	*NE Horley*	*535*	*To be delivered under saved policies in the BLP until policies in the DMP replace these.*
	NW Horley	*1570*	
	Large sites with permission in the urban area	*70*	
	Other sites in the urban area with	*47*			Policy restructured as proposed in July 2010 consultation. Outstanding information now inserted.	See above

		permission			
		Other sites in the urban area as identified through the SHLAA	*160*		
		Total housing units	**2,382**		
	Employment	*Employment development will be accommodated through intensification and re-use of existing employment sites.*	*Up to 24,000sqm*	*Existing employment allocations will be reviewed through the DMP and policies included to encourage intensification and re-use of employment land.*	
	Retail	*Limited additional retail floorspace will be developed to ensure Horley maintains its current role and meets the needs of the growing population.*		*Existing rretail allocations and policies in the BLP will be reviewed and considered for inclusion in the DMP.*	

* <u>In addition to these figures, beyond 2021, housing growth will be delivered in one or more broad locations across the borough.</u>

Infrastructure Priorities			
Scheme	**Purpose**	**Target date/trigger**	**Policy provision**
Drainage and flood prevention measures to allow the development of the NE and NW sectors.	*To ensure that new development is protected from flood risk and does not cause downstream flooding.*	*When development occurs.*	*Saved policies in the Horley Master Plan section of the Borough Local Plan.*
New access routes to NE and NW sector.	*To provide access to, and avoid congestion on, the existing highway network.*	*When development occurs.*	*Saved policies in the Horley Master Plan section of the Borough Local Plan.*

Infrastructure table revised from that consulted on in July 2010, reflecting latest Infrastructure Delivery Plan. Further work in being undertaken to

Provision of a comprehensive playing space for sport facility in preferably one or two locations.	*To provide sports and playing facilities for the residents of the NE and NW sector.*	*When development occurs.*	*Saved policies in the Horley Master Plan section of the Borough Local Plan.*	more fully understand the transport implications of growth.	
Riverside Green Chain open space and/or permissive public access linking the chain.	*To safeguard the river environment, provide recreation space and sustainable pedestrian and cycle routes.*	*When development occurs.*	*Saved policies in the Horley Master Plan section of the Borough Local Plan.*		
Two new neighbourhood centres and community facilities in the NE and NW sectors.	*To provide facilities in a sustainable location to support the new communities.*	*When development occurs.*	*Saved policies in the Horley Master Plan section of the Borough Local Plan.*		
Playspace and play facilities within the NE and NW sectors.	*To provide for the leisure needs of existing and future residents.*	*When development occurs.*	*Saved policies in the Horley Master Plan section of the Borough Local Plan.*		
Provision of two new 1-form entry primary schools	*To accommodate forecast increase in primary school pupil numbers.*	*When development occurs.*	*Saved policies in the Horley Master Plan section of the Borough Local Plan.* *DMP policies and allocations as appropriate.*		
Enhancement to Oakwood Secondary School	*To accommodate forecast increase in secondary school pupil numbers.*	*When development occurs.*	*Saved policies in the Horley Master Plan section of the Borough Local Plan.* *DMP policies and*		

	New leisure centre	To provide for the leisure needs of existing and future residents	2012	Saved policies in the Horley Master Plan section of the Borough Local Plan.		
	Bus priority route corridor, bus/rail interchange and enhanced bus service	To increase travel opportunities for residents and support modal shift towards sustainable forms of transport.	Early provision is preferred to promote regeneration initiatives or when development occurs.	Saved policies in the Horley Master Plan section of the Borough Local Plan. DMP policies as appropriate.		

Housing Delivery

p69 para 6.13-6.2	The Borough has planned for an indicative number of houses, ~~as set out in the Panel Report to the Examination in Public of the Draft South East Plan (2007),~~ of ~~9,460~~ 6,720-8,000 dwellings for the ~~Plan~~ period from 2011-2027, equivalent to between 420 and 500 dwellings per year. ~~The Government has proposed a higher figure to be allocated to the Borough through the Secretary of State's Proposed Changes to the Regional Spatial Strategy for the South East of England of 11,240 dwellings.~~ *Delete original paragraphs 6.14 – 6.17.* *The Council is committed to focusing development in the first 10 years of the plan period within the existing urban area, in particular to deliver the priorities for regeneration and growth identified in Policy CS4.* *In the latter stages of the plan period, s~~Should~~ sufficient sustainable sites within the urban area as defined by this Strategy not be found, it may become necessary to identify small scale Green Belt releases, adjacent to the existing urban area in the most sustainable and least sensitive parts of the Borough ~~review the basis for allocating land as set out in this strategy to accommodate such numbers of dwellings in the future. Only if this were to occur, would a full-scale review of the spatial strategy herein be required.~~ The ~~DMSADPD~~ Development Management Policies DPD will identify and allocate sufficient land to ensure that there is a continued supply of deliverable sites in years 1-5 and developable sites within years 6-10 of the Strategy. Sites will also be identified and allocated as necessary for development within years 11 to 15.* *~~Identifying further sites as part of the DMSADPD~~ This process will include a Green*	Text amended to take account of changed circumstances around the South East Plan and the different timeframe of the Core Strategy as well as the latest housing evidence. The range of 420-500 dwellings per year is included for the purposes of	Total housing delivery across the Borough was appraised looking at a scale from 300pa (SHLAA baseline) to 980pa (SHMA figure) the matrix for this appraisal can be seen following this table.

		Belt Review as recommended by the Secretary of State's Proposed Changes to the draft South East Plan. The Council will conduct this review across the whole of the Borough. The review will not only assess whether there are areas which could be taken out of the Green Belt to provide for future development, but also to validate the areas that need protection and strengthen their protection. The Council will also consider reviewing the potential for adding to the Green Belt to compensate for any sites that may be withdrawn, in line with Policy SP5 of the emerging RSS. This review will be completed no later than 2012. *The Council will ensure that our review is undertaken in a co-ordinated manner and will seek to work across Local Authority boundaries to ensure that a consistent approach is being taken.* *The rate and delivery of this housing will, in the first 10 years, be in accordance with the Borough's NGP status, also illustrated in the Housing Trajectoryas amended and updated from time to time.*	consultation and will be refined prior to submission taking account of consultation responses and further evidence testing.	
p71		**Policy CS12 – Housing Delivery** **1. The Council will plan for** ~~its allocated number of new homes between 2006 and 2026 (not less than 9,240 homes) in accordance with the requirements set out in the Regional Spatial Strategy~~ **between 6,720 and 8,000 new homes between 2011 and 2027.** **2. The Council will allocate the necessary sites to deliver** ~~its regional housing allocation~~ **the**se **homes.** Implementation: This policy will be implemented through: • Development Management <u>Policies</u> ~~and Site Allocations~~ Development Plan Document ~~(complete by 2012)~~ • Identification of housing supply through maintaining the Strategy Housing Land Availability Assessment; • Consideration and determination of planning applications and appeals.	Text amended to take account of changed circumstances around the South East Plan and the different timeframe of the Core Strategy as well as the latest housing evidence. The range of 420-500 dwellings per year is included for the purposes of consultation	The range of housing numbers was assessed generally across the whole Borough and can be seen following this table.

		and will be refined prior to submission taking account of consultation responses and further evidence testing.	

Sustainability Objective	SHLAA baseline: 6,000 (300 pa)	SHLAA + broad locations: 8,400-9,200 (420-460 pa)	South East Plan: 10,000 (500pa)	Past completions 12,500 (625 pa)	Long-term migration trends 15,500 (775pa)	SHMA 19,600 (980 pa)	Comments	Mitigation
To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford	--	-	-	0	+	++	The SHMA figure will address both past and future housing need although there will be issues regarding viability and the quantity of affordable housing required. Long term migration trends will address future housing need. All other options will all fail to fully meet future need to differing degrees. The SHMA option is the only option that will also address past unmet need.	To address the shortfall in affordable housing at lower overall housing numbers higher percentages of affordable housing would have to be sought on each site. This could have an impact on the viability of development.
To facilitate the improved health and wellbeing of the whole population.	--	-	-	0	+	++	The SHMA is the only option that would completely address the existing gap in housing need and meet the ongoing need for suitable affordable housing; again this would be subject to viability testing. The full scale of housing need is outlined in the SHMA and limiting housing provision to below this need would have a negative effect on the health and wellbeing on those that remain in inappropriate accommodation. Health and wellbeing in relation to open space is covered in obj. 14	In relation to a lower provision of housing, including affordable housing, a housing strategy would be required to house those unable to afford a home.
To reduce poverty and social exclusion	--	-	-	0	+	++	The SHMA is the only option that would completely address the existing gap in housing need and meet the ongoing need for suitable affordable housing. The full scale of housing need is outlined in the SHMA and limiting housing provision to below this need would have a negative effect on people unable to access the housing market.	The housing strategy (see above) would need to focus on integrating temporary housing into mainstream services and inclusive access to community/leisure facilities.
To create and maintain safer and more secure communities	0	0	0	0	0	0	Infrastructure Delivery Plan/Development Management Policies DPD and developer contributions should provide infrastructure and policies to manage the potential negative effects of an increasing population.	
To minimise the harm from flooding	0	0	0	0	-	-	The figures presented in the long term migration trends and SHMA are so high that the level of mitigation required to ensure flood risk would not be increased would potentially have a negative impact on the viability of delivering that level of housing.	The effects on flood risk through housing development would be mitigated through the requirements of PPS25, CS9 (Sustainable Development) and the Reigate & Banstead SFRA.
To improve the accessibility to all services and facilities	0	+	+	+	+	+	Increases in population could produce a step change in infrastructure provision within a settlement, such as provision of new schools and community facilities. However, without sufficient investment existing infrastructure is likely to be stretched to capacity.	Community Infrastructure Levy / Infrastructure Delivery Plan to identify and secure infrastructure requirements.

Sustainability Objective	SHLAA baseline: 6,000 (300 pa)	SHLAA + broad locations: 8,400-9,200 (420-460 pa)	South East Plan: 10,000 (500pa)	Past completions 12,500 (625 pa)	Long-term migration trends 15,500 (775pa)	SHMA 19,600 (980 pa)	Comments	Mitigation
To make the best use of previously developed land and existing buildings	+	+	+	+	+	+	All options will prioritise previously developed urban land.	
To reduce land contamination and safeguard soil quality and quantity	+	0	0	-	-	--	The SHLAA figure and to some extent the SHLAA plus broad locations would use PDL and therefore could lead to the remediation of contaminated land which will have the affect of safeguarding soil quantity and quality. The targets set on the SHLAA plus broad locations figure upwards will involve the use of Greenfield sites and therefore may have a negative impact on soil quality and quantity.	To reduce the impact on this SA objective on higher housing numbers the Greenfield land used for development could be of lower quality and could incorporate environmental improvements to the greenspace both within the development and adjoining.
To ensure air quality continues to improve	-	-	-	--	--	--	The greater the number of dwellings the higher the risk of air quality issues.	Mitigation can be sought through encouraging alternative modes of travel, energy efficiency and a move to cleaner renewable energy.
To reduce noise pollution	-	-	-	-	--	--	The risk of noise pollution will increase with density.	Some causes of noise pollution can be mitigated by design.
To reduce light pollution	-	-	-	-	--	--	The risk of light pollution will increase with density.	Some causes of light pollution can be mitigated by design.
To maintain and improve the water quality of the rivers and groundwater	-	-	-	-	--	--	The risk of water pollution will increase with density. Sewage discharge into watercourses will increase as housing numbers rise	Some water pollution can be mitigated by swales, ponds and design. Sewage discharge from development must be mitigated by virtue of building regulations and EU legislation.
To conserve and enhance biodiversity within the plan area	+	0	0	-	--	--	Lower housing targets would reduce the pressure to build on Greenfield land. Higher housing targets will mean the use of Greenfield sites which would be higher in biodiversity value than PDL and therefore a negative impact is produced.	Sites of particular biodiversity importance can be protected, and environmental enhancements can be introduced both within development and adjoining to encourage species diversity.
To protect and enhance the natural, archaeological, historic environments and cultural assets	+	0	0	-	--	--	Lower housing targets would mean housing could be directed to PDL reducing the pressure on Greenfield land, thereby protecting environmental, historic and natural assets. The loss of the natural open space can also have detriment to health and wellbeing.	The loss of greenspace can be mitigated by improvements in access to currently inaccessible areas of greenspace thereby opening up greater areas of open land for public use. Historic assets are generally protected, but must be considered in designs for proposed development nearby

Sustainability Objective	SHLAA baseline: 6,000 (300 pa)	SHLAA + broad locations: 8,400-9,200 (420-460 pa)	South East Plan: 10,000 (500pa)	Past completions 12,500 (625 pa)	Long-term migration trends 15,500 (775pa)	SHMA 19,600 (980 pa)	Comments	Mitigation
To reduce road congestion and the need to travel	0/-	0	0	-	-	-	Additional housing will result in greater congestion, although if the housing target is too low then there may be an increase in in-commuting, and if it is too high there will be out-commuting. At lower levels congestion can be mitigated by location of development and alternative modes of travel as development can focus on making the best use of urban land. Baseline employment projections would have the best balance with SHLAA plus broad locations for a reduction in commuting.	At lower levels of housing congestion can be mitigated by location of development and alternative modes of travel as development can focus on making the best use of urban land. Higher levels of housing would need the necessary links to public transport provided as part of the development package.
To reduce greenhouse gases	0	-	-	-	--	--	Additional housing will result in an overall increase in greenhouse gases.	This can be mitigated to some extent by sustainable construction policies.
To ensure that the Borough is prepared for the impacts of climate change	0	0	0	-	-	--	Climate change impacts can be sufficiently mitigated by open space/ponds/SuDS/greening up to a point. Greater use of Greenfield land for housing to the level suggested by the SHMA will negatively impact on the Borough's ability to adapt as green space will not be as available for use in rainwater attenuation and to aid urban cooling.	Green space should be designed into all development, as sufficient space for flood attenuation and urban cooling. Design can improve climate change resilience through greenroofs, building orientation, blue space and planting - this will be covered in the Development Management Policies DPD.
Provide for employment opportunities	0	0	0	0	+	+	Increases in population may create a greater demand for retail and services within the Borough.	
Make land available to meet the needs of the economy	++	+	+	0	-	--	There is already a shortfall of employment land in the Borough; there is conflict between land for housing and land for employment. Although providing a workforce is also an economic consideration.	Current employment land needs to be utilised to its maximum potential to reduce the amount of land needed to serve employment purposes.
To support economic growth which is inclusive, innovative and sustainable	-	++	++	++	0	0	To ensure that economic growth is sustainable and inclusive a balance needs to be found between the number of employees needed to sustain the economy and the level of housing growth. If the housing target is too low then there may be an increase in in-commuting, and if it is too high there will be out-commuting. The provision of housing will support a flexible labour market and potential consumers to support economic growth. The economic growth is forecast at around 450 jobs per year.	
To achieve sustainable production and use of resources	+	++	++	-	-	--	Development on PDL represents the best use of this land and in resource terms a higher density development would imply this resource is being used to its maximum efficiency. Further along the scale, higher housing numbers are not sustainable as resources would need to be sourced from further afield to satiate the larger population and development would need to be going on Greenfield sites.	Sustainable construction will go some way to addressing this.

Sustainability Objective	SHLAA baseline: 6,000 (300 pa)	SHLAA + broad locations: 8,400-9,200 (420-460 pa)	South East Plan: 10,000 (500pa)	Past completions 12,500 (625 pa)	Long-term migration trends 15,500 (775pa)	SHMA 19,600 (980 pa)	Comments	Mitigation
To increase energy efficiency of new and existing development	+	+	+	+	++	++	Development at a larger scale increases the viability of more energy efficient energy generation such as Combined Heat and Power (CHP). All new development will be energy efficient in line with building regulations.	Any new development should be assessed in terms of feasibility for CHP.
To increase the production and use of renewable energy	+	+	+	0	-	-	Renewable energy can be produced whatever the scale of development. Higher density development may reduce the land available for certain renewable energy sites, and proximity to dwellings can inhibit certain types of renewable energy e.g. noise from wind energy, smell from waste energy.	Any new development should be assessed in terms of feasibility for renewable energy production. Careful design and layout can maximise the potential for renewable that may cause nuisance to proximate dwellings.

These 'Broad Locations' options have been assessed to inform the development of policy. No decision has been made by the Council in relation to the specific type of Broad Location that may be pursued, or with regard to any specific sites within them.

SHLAA Broad locations for future growth (years 11-15 and beyond)

Do nothing

This scenario assumes that when all housing land identified in the SHLAA has been developed no new housing will be delivered.

SA Objective	Assessment			Comments\Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	+	-	-	Medium to long term this will not only affect availability of housing but also affordability as demand increasingly outweighs supply.
2. To facilitate the improved health and wellbeing of the whole population.	0	+/-	+/-	There are positives and negatives here, the impact of not building on green space could improve health and wellbeing, but a lack of housing will have a negative impact on those in need of (affordable) homes. The negative impacts of a loss of green space can be lessened by design enabling better access to currently restricted areas of countryside / open space.
3. To reduce poverty and social exclusion.	-	-	-	When housing supply does not meet demand it brings potential for an ever widening social and economic divide between those able to access market housing and those who cannot.
4. To create and maintain safer and more secure communities.	0	0	0	
5. To minimise the harm from flooding.	0	0	0	Any new development would require design measures such as SuDS which would mitigate flood risk.
6. To improve accessibility to all services and facilities.	-	-	-	Temporary housing and homelessness removes people from the possibility of accessing services and facilities. Having a permanent residence gives the opportunity to become part of a community.
7. To make the best use of previously developed land and existing buildings.	+	+/-	-	Additional urban sites may come forward which have not been identified, this option would not make the best use of these sites.
8. To reduce land contamination and safeguard soil quality and quantity.	+	+	+	Not developing on UOL will impact positively on this objective.
9. To ensure air quality continues to improve.	0	0	0	The limited increase in dwellings and stabilisation of population growth in the Borough may lead to an improvement in air quality, but if the economy of the area remains strong there will be an increase in in-commuting which will increase air pollutants. Air quality will improve with a reduction in travel and energy efficient homes; this can be achieved with more development, if well located.
10. To reduce noise pollution.	0	+	+	Noise pollution would be less of an issue if housing is at a lower density, although this can be reduced through good design.
11. To reduce light pollution.	0	0	0	

12. To maintain and improve the water quality of the region's rivers and groundwater	0	+	+	River and groundwater quality is impacted on negatively by an increase in development, unless it is carefully mitigated. This can be done through SuDS including the use of newly developed ponds to reduce pollutant run-off.
13. To conserve and enhance biodiversity within the plan area.	0	0	0	Development does not necessarily impact negatively on biodiversity provided sufficient design measures are in place. This objective is also dependent on the location of development, and whether this complements to GIS.
14. To protect and enhance the natural, archaeological, historic environments and cultural assets.	+	+	+	Limiting development will have a positive impact on natural and historic environments.
15. To reduce road congestion and the need to travel	0	+/-	+/-	A reduction in house building will reduce general traffic (schools/shopping related) in the Borough, although it must be acknowledged that there may be an increase in in-commuting as people have to move further from their jobs.
16. To reduce greenhouse gases	0	0	0	In the long term there will be a reduction as a slow in housing development will mean less CO2 from heating systems and potentially car use (see obj.15 above) however this is balanced out by the resultant increase in in-commuting caused by lack of housing for local workers.
17. To ensure that the District is prepared for the impacts of climate change	0	+	+	Not building on open land and green space will increase the Boroughs adaptability to the impacts of climate change.
18. Provide for employment opportunities	0	0	0	
19. Make land available to meet the needs of the economy	0	-	-	A weak supply of housing contributes to macroeconomic instability and hinders labour market flexibility, constraining economic growth.
20. Support economic growth which is inclusive, innovative and sustainable	0	-	-	A weak supply of housing contributes to macroeconomic instability and hinders labour market flexibility, constraining economic growth.
21. To achieve sustainable production and use of resources	0	+	+	Less resource use associated with reduced housing supply.
22. To increase energy efficiency of new and existing development.	0	0	0	
23. To increase the production and use of renewable energy.	-	-	-	New development brings with it the opportunity to provide on-site renewables.

Summary:
This option of building only the number identified through the SHLAA analysis of available, deliverable and developable sites has some positive impacts on the environment, in relation to landscape, biodiversity, water quality and climate change, although the impacts of higher levels of growth can be mitigated by good design. Changes in behaviour, such using public transport can also help mitigate an increase in development. There are also many negative impacts on social and economic sustainability objectives from not taking action to address the housing need in the Borough, these are on the affordability of housing and the associated social problems this causes (for example lack of access to services and facilities, temporary housing and people in lower paid professions unable to live in the area). Economically, housing is required to support economic growth and a shortage of supply hinders labour market flexibility.

Recommendations
If the housing is not delivered past what is identified on SHLAA sites then it must be accepted that the economy will be constrained, and there will be a shortage of affordable housing for nurses, teachers and other lower paid but vital professions. This may mean relying on in-commuting which may not be viable long term with increases in fuel and public transport costs. The only way of addressing the shortage of affordable housing, and not building more housing than the SHLAA figure, is to ensure that the percentage of affordable housing built on the currently available land is high - although this in itself may not be economically viable.

SHLAA Broad locations for future growth (years 11-15 and beyond)

Flats above shops
This scenario implies using units not currently in residential use that are above areas for small businesses and local shopping centres.

SA Objective	Assessment			Comments\Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	+	+	0	This will provide potentially affordable dwellings in the short term but the supply will soon be exhausted.
2. To facilitate the improved health and wellbeing of the whole population.	+	+	0	Providing homes for people with no loss of greenfield sites.
3. To reduce poverty and social exclusion.	+	+	0	Providing homes for people with no loss of greenfield sites.
4. To create and maintain safer and more secure communities.	+	+	0	Building over shops and business areas can provide surveillance enabling a more secure environment, particularly for a night time economy.
5. To minimise the harm from flooding.	+	+	0	Providing homes for people with no loss of greenfield sites. Safe access and egress will need to be considered as some shops may be in flood zones.
6. To improve accessibility to all services and facilities.	+	+	0	Flats over shopping centres will be ideally located for accessibility to a range of services and facilities.
7. To make the best use of previously developed land and existing buildings.	+	+	0	
8. To reduce land contamination and safeguard soil quality and quantity.	+	+	0	Will reduce pressure to build on undeveloped land.
9. To ensure air quality continues to improve.	+	+	0	The location of these dwelling will mean a reduction in car journeys.
10. To reduce noise pollution.	?-	?-	0	May be an issue in a busy area. Good design can reduce this issue.
11. To reduce light pollution.	0	0	0	
12. To maintain and improve the water quality of the region's rivers and groundwater	+	+	0	Will reduce pressure to build on undeveloped land.
13. To conserve and enhance biodiversity within the plan area.	+	+	0	Will reduce pressure to build on undeveloped land.
14. To protect and enhance the natural, archaeological, historic environments and cultural assets.	+	+	0	Will reduce pressure to build on undeveloped land.
15. To reduce road congestion and the need to travel	+	+	0	Good accessible locations.
16. To reduce greenhouse gases	+	+	0	As obj. 15
17. To ensure that the District is prepared for the impacts of climate change	0	0	0	
18. Provide for employment opportunities	+	+	0	The flats will be in locations with employment opportunities.
19. Make land available to meet the needs of the economy	0	0	0	Care would need to be taken to ensure this did not result in the loss of high quality commercial provision from town centres.
20. Support economic growth which is inclusive, innovative and sustainable	+	+	0	
21. To achieve sustainable production and use of resources	+	0	0	Sustainable use of resources as buildings already exists.
22. To increase energy efficiency of new and existing development.	-?	-?	0	Retrofitting of energy efficiency measures will be required.

| 23. To increase the production and use of renewable energy. | 0 | 0 | 0 | |

Summary:
This option is positive in terms of reducing pressure for development on green field land with no loss of green space. By their nature these dwellings will have good accessibility to services and facilities and will thus reduce congestion. This option will bring positive benefits to the area by improving surveillance. There will be a limited supply of this kind of development which will require further broad locations to complement it.

Recommendations
- Design measures will be required to prevent the occupiers of these dwelling being disturbed by noise.
- Retrofitting of energy efficiency measures will be required.
- The loss of high quality smaller retail units should be avoided.

SHLAA Broad locations for future growth (years 11-15 and beyond)

Development in Residential Areas
Adopting a flexible approach to developing in sustainably located low density areas (including Residential Areas of Special Character RASC)

SA Objective	Assessment			Comments\Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	+	+	0	Initially a greater number of affordable homes could be provided on land currently only used for a few homes; however, in the longer term this land will not be enough to satiate the housing demand. Additional land would be required to complement this option.
2. To facilitate the improved health and wellbeing of the whole population.	0	0	+/-	The increase in affordable housing in a good accessible location would improve the wellbeing of those in need of housing; however the impact of those currently living in nearby could be negative, although this could be partly mitigated by good design.
3. To reduce poverty and social exclusion.	+	+	+	In an accessible location providing affordable housing on the land would improve social integration.
4. To create and maintain safer and more secure communities.	0	0	+	Redevelopment of existing neighbourhoods could lend itself to better design in terms of security, e.g. surveillance.
5. To minimise the harm from flooding.	0	0	0/+	This option will reduce the pressure to build on undeveloped land, thus having a positive impact on this objective. As the development may have the same footprint as the previous development this will not necessarily have any impact, however, use of design measures, such as SuDS will be necessary to reduce flood risk.
6. To improve accessibility to all services and facilities.	+	+	+	Some low density residential areas (e.g. North Reigate) are in very accessible locations.
7. To make the best use of previously developed land and existing buildings.	+	+	+	Reduces pressure to build on green field land
8. To reduce land contamination and safeguard soil quality and quantity.	0	0	0	

9. To ensure air quality continues to improve.	- / +	- / +	- / +	Intensification of the urban area will have a negative impact on air quality in the development area due to traffic and heating systems. This can be mitigated by encouragement to use alternative modes of travel and renewable energy. On a larger scale, the locations may be more accessible by public transport thereby reducing car miles.
10. To reduce noise pollution.	- / +	- / +	- / +	Intensification of the urban area will have a negative impact on noise due to traffic and domestic noise. This can be mitigated by encouragement to use alternative modes of travel and building design. On a larger scale, the locations may be more accessible by public transport thereby reducing car miles.
11. To reduce light pollution.	0	0	0	There will be a slight impact on light but this is not significant
12. To maintain and improve the water quality of the region's rivers and groundwater	0	0	0	
13. To conserve and enhance biodiversity within the plan area.	+	+	+	This option will reduce the pressure to build on undeveloped land thus have the potential to minimise harm to biodiversity. Design measures could be incorporated into development that would encourage biodiversity.
14. To protect and enhance the natural, archaeological, historic environments and cultural assets.	+	+	+	This option will reduce the need to build on undeveloped land, thus protecting landscapes and other assets. RASCs are not designated due to historical or architectural merit.
15. To reduce road congestion and the need to travel	+	+	+	Although intensification will increase traffic in the area of development, as a whole, because development will be in more sustainable locations the increase in traffic would not be so great as if there was development put into non-urban areas (areas without train stations for example).
16. To reduce greenhouse gases	?	?	?	Greenhouse gas reduction can come from two main areas, heating and traffic – locating development in urban area will mean access to public transport but the smaller pockets of developable area may not provide sufficient quantities of development to enable CHP.
17. To ensure that the District is prepared for the impacts of climate change	-	-	-	Loss of large back gardens and space around dwellings to go to higher density development may have a negative impact on climate change impacts (e.g. cooling and heat island effect). This would be neutral if the development maintained the development footprint of the original building.
18. Provide for employment opportunities	0	0	0	
19. Make land available to meet the needs of the economy	+	+	+	The provision of housing will support a flexible labour market.
20. Support economic growth which is inclusive, innovative and sustainable	+	+	+	As above.

21. To achieve sustainable production and use of resources	+	+	+	Developing a previously developed area.
22. To increase energy efficiency of new and existing development.	+	+	+	Detached homes are potentially less energy efficient than terrace/flats.
23. To increase the production and use of renewable energy.	0	0	0	Renewable energy can be produced on any density development

Summary:
The benefits of this approach are in putting development into what is an existing residential area, with existing infrastructure and negate the need, in the short-medium term, to build in green field sites. The loss of open space and greening could be limited by restricting development to the original development footprint, but providing higher density development within that footprint, such as flats. The impact on those currently living in these areas can be alleviated somewhat by excellent design, including designing in better security, biodiversity and flood risk mitigation.

Recommendations
Should this option be chosen then areas for development should be identified in accessible locations - walking distance to town and public transport.
The increased housing densities on what would have previously been lower density will need to be mitigated in terms of:
- flood risk (incorporating SuDS) ;
- biodiversity (measures within new development such as creation of habitats, ponds, bird boxes etc); and
- climate change (through building design, orientation and landscaping to provide shading, shelter and cooling).
- Design guidance should be produced to ensure a limited impact on the special character of the area.

SHLAA Broad locations for future growth (years 11-15 and beyond)

Urban Open Land (UOL) or other urban green space
Development on a small portion of urban open space, for example across areas designated as UOL that are not in active use (e.g. schools, playing fields), not suitable for housing (e.g. ponds) or covered by other policy or legal protection (e.g. woodlands, allotments

SA Objective	Assessment			Comments\Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	+	+	?	Positive in the short to medium term but UOL is a finite resource so there will come a point when there is no more UOL to deliver new housing. Additional development land from other sources will be required to compliment this scenario.
2. To facilitate the improved health and wellbeing of the whole population.	-	-	-	Evidence shows us that green space is beneficial for health, both in terms of providing space for exercise (sports grounds, dog walking) and in terms of mental well being. (NB. Not all UOL is public land and private UOL may or may not be accessible and therefore may not provide these benefits.) However, some UOL in private ownership is accessible and provided health benefits e.g. tennis clubs.
3. To reduce poverty and social exclusion.	-	-	-	There is a strong social impact to building on UOL. UOL may be the only green space or open land that certain members of the community have access to e.g. people living in flats or without cars. UOL also provides free recreation space for those unable to afford gym fees or sports clubs. (NB. Not all UOL is public land and private UOL may or may not be accessible and therefore may not provide these benefits.)
4. To create and maintain safer and more secure communities.	0	0	0	No impact on community safety

5. To minimise the harm from flooding.	-	-	-	Open space plays an important role in mitigating flood risk, the importance of this varied across the Borough.
6. To improve accessibility to all services and facilities.	+	+	+	UOL is located in the urban area, therefore will mostly be in accessible locations. Some UOL areas are not as accessible as others and this would have to be assessed on a site by site basis. Some urban green space is inaccessible, development of a small part of one site can enable improvements in access to the rest of it, for use as recreation land.
7. To make the best use of previously developed land and existing buildings.	?+	?+	?+	This would be site specific as some UOL is PDL.
8. To reduce land contamination and safeguard soil quality and quantity.	0	0	0	This is site specific, and dependent on the type of UOL that is to be developed on.
9. To ensure air quality continues to improve.	- / +	- / +	- / +	Intensification of the urban area will have a negative impact on air quality in the development area due to traffic and heating systems. This can be mitigated by encouragement to use alternative modes of travel and renewable energy. On a larger scale, the locations may be more accessible by public transport thereby reducing car miles.
10. To reduce noise pollution.	- / +	- / +	- / +	Intensification of the urban area will have a negative impact on noise due to traffic and domestic noise. This can be mitigated by encouragement to use alternative modes of travel and building design. On a larger scale, the locations may be more accessible by public transport thereby reducing car miles.
11. To reduce light pollution.	0	0	0	There will be a slight impact on light but this is not significant as light may be an issue from UOL uses such as sports grounds at present.
12. To maintain and improve the water quality of the region's rivers and groundwater	?-	?-	?-	This will depend on the site and whether there are watercourses nearby. Green space helps absorb pollution from surface water run-off so there will be slight negative impacts through the loss of UOL.
13. To conserve and enhance biodiversity within the plan area.	-	-	-	Many UOL sites form part of a network of multi-functional green space which enables connectivity of habitat, species movement and adaptability, or they form important green corridors between sites. The GIS should inform which green spaces are particularly important in this respect and any development should seek to maintain and enhance any important linkages.
14. To protect and enhance the natural, archaeological, historic environments and cultural assets.	+	+	+	Building on UOL may protect other natural or historic environments.

15. To reduce road congestion and the need to travel	+	+	+	Although intensification will increase traffic in the area of development, as a whole, because development will be in more sustainable locations the increase in traffic would not be so great as if there was development put into non-urban areas (areas without train stations for example).
16. To reduce greenhouse gases	?	?	?	Greenhouse gas reduction can come from two main areas, heating and traffic – locating development in urban area will mean access to public transport but the smaller pockets of UOL may not provide sufficient quantities of development to enable CHP.
17. To ensure that the District is prepared for the impacts of climate change	-	-	-	Open green space plays an important role in reducing flood risk and providing transpirational cooling from the greenery/trees.
18. Provide for employment opportunities	0	0	0	The housing itself will not provide employment opportunities.
19. Make land available to meet the needs of the economy	+	+	+	The provision of housing will support a flexible labour market.
20. Support economic growth which is inclusive, innovative and sustainable	+	+	+	As above
21. To achieve sustainable production and use of resources	0	0	0	
22. To increase energy efficiency of new and existing development.	-	-	-	Larger scale development may be required to make CHP viable.
23. To increase the production and use of renewable energy.	0	0	0	Renewable energy can be produced regardless of location/ size of development.

Summary: The most important impacts that would be felt by the residents of the Borough are in terms of climate change and social inequalities. There is also the potential of loss of sites of bio-diversity value and sites which are part of a multi-functional green network for both people and wildlife, providing a range of functions such as flood mitigation, access and sport.

Building on UOL has the potential to disproportionately impact on the poorest in our Borough as they may have limited access to the countryside, and may not have large gardens to enjoy. With obesity becoming a problem in children and teenagers, the loss of recreation space and open space that can be used for football, dog walking etc. may also disproportionately impact on those less able to afford alternative exercise facilities. Some urban green space is inaccessible; development of a small part of one site can enable improvements in access to the rest of it, for use as recreation land. This will improve the amenity value of the land, but not the value for biodiversity, and should therefore be assessed on a site by site basis.

In order to mitigate the impacts of climate change UOL may be invaluable as an area to absorb surface water and to make the human environment a more acceptable one in relation to heat.

Recommendations

If this option were selected there are mitigation measures that if taken, would lessen the negative impact made from building on UOL.
1. Local and **site by site** assessment should be made of UOL, taking into account their value in terms of housing, but also their value in the local context, and as individual sites, in terms of their contribution to open space, recreation value, biodiversity, etc.
2. UOL should firstly be released for development in areas with areas where there is above average provision of open space, or private gardens in the Borough.
3. UOL that is publically owned and accessible to the public should be safeguarded in areas of relative deprivation unless development provides the opportunity to upgrade or open up the remainder of the site.
4. UOL that is highlighted in the GIS as important in providing a 'green corridor' for species movement should be safeguarded and corridors protected.
5. Climate change mitigation measures should be designed into new development, including significant levels of greening and SuDs.

SHLAA Broad locations for future growth (years 11-15 and beyond)

Sustainable Urban Extensions (likely to be Green Belt)				
This scenario assumes that unspecified areas in the Green Belt will be released for housing in the most sustainable locations after development on previously developed land has reached capacity.				
SA Objective	Assessment			Comments\Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	+	+	+	Sufficient land is available to meet the housing demand and produce affordable homes.
2. To facilitate the improved health and wellbeing of the whole population.	+	+	0	This is positive in terms of providing housing for people in need of it, but negative in the loss of green space and the health implications that it confers. However it should be noted that not all Green Belt is accessible, and some privately owned areas are unlikely to contribute to the health and wellbeing of the population. Development could be designed to open up new routes and spaces, thus increasing the health benefits of green space.
3. To reduce poverty and social exclusion.	+	+	+	The production of affordable housing will reduce the gap between those that can afford their own home and those that cannot.
4. To create and maintain safer and more secure communities.	0	0	0	
5. To minimise the harm from flooding.	-	-	-	Building on greenfield land reduces the land's capacity to deal with heavy rainfall. Design measures such as SuDS should be incorporated into all new development in order to reduce flood risk. This is dependent on the area of Green Belt released; care should be taken to follow the sequential test as required by PPS25.
6. To improve accessibility to all services and facilities.	?+	?+	?+	The scenario assumes that the most accessible locations are used, although this is site specific. This also depends on the scale of the site and how much infrastructure will be developed within the area, for example shops, schools etc, if this was the case the option has the potential to be positive.
7. To make the best use of previously developed land and existing buildings.	-?	-?	?	Building in the Green Belt would take development away from PDL, unless PDL is at saturation point. Careful triggers would need to be incorporated into policy to ensure that PDL, including sites that are yet to come forward, are built on before releasing any GB land.
8. To reduce land contamination and safeguard soil quality and quantity.	-?	-?	-?	Contamination issues would be decided at a site specific level. Soil quantity and quality could potentially be an issue, particularly if the land is used for agriculture, although care can be taken so as to not irreversibly affect the soil.

9. To ensure air quality continues to improve.	?	?	?	This would depend on the areas released as to how much additional traffic would be generated. It would potentially create air quality issues where there previously were none, but conversely there would be less development in urban areas which are already struggling in terms of air quality.
10. To reduce noise pollution.	0	0	0	
11. To reduce light pollution.	0	0	0	
12. To maintain and improve the water quality of the region's rivers and groundwater	-?	-?	-?	Development on greenfield land may affect water quality if close to a watercourse, this could be mitigated by design.
13. To conserve and enhance biodiversity within the plan area.	-	-	-	The development of green field sites in the Green Belt will detrimentally affect biodiversity although this can be mitigated by designing in biodiversity measures into all development. Care should also be taken to prevent habitat severance; the GIS should be used to determine which areas are least likely to do this.
14. To protect and enhance the natural, archaeological, historic environments and cultural assets.	-	-	-	The development of greenfield sites in the Green Belt will detrimentally affect the natural environment; however, this strategy would alleviate development pressure on sensitive urban character areas.
15. To reduce road congestion and the need to travel	?	?	?	This depends on the scale of the site and how much infrastructure will be developed within the area, for example shops, schools etc. Potentially, a self contained neighbourhood could reduce car journeys if it incorporated sufficient services within the area.
16. To reduce greenhouse gases	0	0	0	As obj. 15 and 22
17. To ensure that the District is prepared for the impacts of climate change	-/0	-/0	-/0	As obj. 5, but may be more comfortable for human habitation than high density urban dwellings.
18. Provide for employment opportunities	0	0	0	
19. Make land available to meet the needs of the economy	+	+	+	The provision of housing will support a flexible labour market.
20. Support economic growth which is inclusive, innovative and sustainable	+	+	+	The provision of housing will support a flexible labour market and potential consumers to support economic growth.
21. To achieve sustainable production and use of resources	+	+	+	New houses will be built to 'greener' standards and therefore represent a sustainable use of resources.
22. To increase energy efficiency of new and existing development.	+	+	+	New houses will be built to 'greener' standards and therefore will be more energy efficient.
23. To increase the production and use of renewable energy.	0	0	+	CHP may be more viable in larger scale developments.

Summary: This scenario has been appraised at a strategic level and not having reference to any particular part of the Borough. If a Green Belt release were to occur then thorough appraisal of a number of potential sites would need to be undertaken. Any policy would require the use of careful wording that would only trigger the release of MGB land once the supply of PDL has been developed, this is necessary to ensure that urban regeneration is the priority for development; all the while it is feasible. The most accessible locations are going to be sought, which would lead to minimal increases in car miles. A potential negative impact is the loss of soil quantity and quality, particularly if the development was on agricultural land, although care can be taken so as to not irreversibly affect the soil. This development scenario would gain greater sustainability credentials if the scale of the development allowed for supporting infrastructure that would reduce the need for travel such as shops, community and leisure facilities and schools. A large scale development would also increase the potential viability for a CHP scheme. The GI Strategy would need to be in place to inform design for biodiversity and habitat corridors that would need protecting or enhancing through design measures. Design measures are important in minimising the disturbance to the landscape. The development would need to take into account nearby watercourses that could be negatively impacted on by the development. This scenario scores positively in social terms from the benefits of providing sufficient housing, and also in terms of the support to the economy by way of consumers and a flexible labour market.

Recommendations
- Carefully worded triggers to allow MGB to be released only after all PDL is at capacity.
- Locations chosen on accessibility, proximity to public transport, and sensitivity of landscape.
- Scale of development is considered in order to support other infrastructure necessary to reduce car usage.
- Scale of development is considered in order to support CHP.
- GIS should inform areas that function as green corridors, and sufficient design recommendations to prevent impacts on biodiversity.
- Sequential testing should be used to ensure land in areas of high flood risk are not developed.
- Flood risk design measures such as SuDS should be incorporated into all development.
- Design measures to limit the impact on the landscape.

SHLAA Broad locations for future growth (years 11-15 and beyond)

Rural Surrounds of Horley (RSH)

This scenario assumes that unspecified areas in the RSH will be released for housing in the most sustainable locations after development on previously developed land has reached capacity.

SA Objective	Assessment			Comments\Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	+	+	+	This option could result in a large quantity of housing being built which will have a positive impact on affordability.
2. To facilitate the improved health and well being of the whole population.	+	+	0	Whilst the housing provided will mean a reduction in social issues associated with homelessness and lack of affordable housing, this is balanced by the removal of accessible green space surrounding Horley may impact negatively on the physical and mental health of current residents. This could be overcome by design measures across the development, ensuring better access to green space by opening up new routes and spaces.
3. To reduce poverty and social exclusion.	+	+	+	This option will mean accessibility to affordable housing and the social benefits which come with this.
4. To create and maintain safer and more secure communities.	0	0	0	
5. To minimise the harm from flooding.	-	-	-	Much of the RSH are within the 1 in 100 year flood zone, and cover an area shown in the BLP2005 as worst case historic flood event. One area SE of Horley is not affected by flooding.

6. To improve accessibility to all services and facilities.	+?	+?	+?	Assuming the most accessible locations are used, although this is site specific. This also depends on the scale of the site and how much infrastructure will be developed within the area, for example shops, schools etc, if this was the case the option has the potential to be positive.
7. To make the best use of previously developed land and existing buildings.	-?	-?	?	Building in the RSH would take development away from PDL, unless PDL is at saturation point. Careful triggers would need to be incorporated into policy to ensure that PDL, including sites that are yet to come forward, are built on before releasing RSH.
8. To reduce land contamination and safeguard soil quality and quantity.	-?	-?	-?	Contamination issues would be decided at a site specific level. Soil quantity and quality could potentially be an issue, particularly if the land is used for agriculture, although care can be taken so as to not irreversibly affect the soil.
9. To ensure air quality continues to improve.	?	?	?	This would depend on the areas released as to how much additional traffic would be generated. It would potentially create air quality issues where there previously were none, but conversely there would be less development in urban areas which are already struggling in terms of air quality.
10. To reduce noise pollution.	0	0	0	It should be noted that some of the properties in this area may be affected by aircraft noise. This can be overcome by design measures.
11. To reduce light pollution.	0	0	0	
12. To maintain and improve the water quality of the region's rivers and groundwater	-	-	-	The flood issues may cause a negative impact on the water quality of the rivers surrounding Horley.
13. To conserve and enhance biodiversity within the plan area.	-	-	-	The development of green field sites in the RSH will detrimentally affect biodiversity although this can be mitigated by designing in biodiversity measures into all development. Care should also be taken to prevent habitat severance.
14. To protect and enhance the natural, archaeological, historic environments and cultural assets.	-	-	-	The development of green field sites in the RSH will detrimentally affect the natural environment ; however, this strategy would alleviate development pressure on sensitive urban character areas.
15. To reduce road congestion and the need to travel	?	?	?	This depends on the scale of the site and how much infrastructure will be developed within the area, for example shops, schools etc. Potentially, a self contained neighbourhood could reduce car journeys if it incorporated sufficient services within the area.
16. To reduce greenhouse gases	0	0	0	
17. To ensure that the District is prepared for the impacts of climate change	-	-	-	Much of the RSH is prone to flooding.
18. Provide for employment opportunities	0	0	0	
19. Make land available to meet the needs of the economy	+	+	+	The provision of housing will support a flexible labour market.
20. Support economic growth which is inclusive, innovative and sustainable	+	+	+	The provision of housing will support a flexible labour market.

21. To achieve sustainable production and use of resources	+	+	+	New houses will be built to 'greener' standards and therefore represent a sustainable use of resources.
22. To increase energy efficiency of new and existing development.	+	+	+	New homes would be energy efficient.
23. To increase the production and use of renewable energy.	+	+	+	Housing could be built to a scale to allow CHP to be viable.

Summary:

Flooding is the main sustainability concern with regards to the RSH, much of the RS are covered by a 1 in 100 year flood risk zone, and historical flood data shows the area has experienced significant flood events. In view of this, and taking into account the precautionary principle in light of climate change, it is supposed in this appraisal that building in much of the RSH would result in negative impacts in respect of flooding. Biodiversity will incur a negative impact, although due to the proximity of the Green Belt to this RSH this could be mitigated with habitat creation nearby and green corridors linking habitats identified through the GIS.

<u>**Recommendations**</u>

- Sequential testing for land allocation,
- Design measures to encourage access and opening up of green space,
- Careful triggers would need to be incorporated into policy to ensure that PDL, including sites that are yet to come forward, are built on before releasing RSH
- Design measures to reduce the risk from flooding e.g. SuDS

SA Objective	Assessment	Comments\Proposed Mitigation

Policy CS3 – Valued People

1. **The Council will promote and support <u>continued</u> sustainable economic <u>prosperity</u> ~~growth~~ and regeneration <u>in Reigate & Banstead by</u>:**
   a. **Identifying, targeting and working to improve <u>the priority</u> ~~selected~~ Regeneration Areas, where development and growth can deliver <u>economic, social and environmental</u> improvements to those areas and <u>the</u> people who live in them ~~who have fewer advantages than others~~; <u>in particular raising the profile of Redhill as a key commercial location.</u>**

SA Objective	Assessment	Comments\Proposed Mitigation
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	0	Balance between housing and economic prosperity is sought.
2. To facilitate the improved health and wellbeing of the whole population.	+	Environmental / social improvement brought about by regeneration.
3. To reduce poverty and social exclusion.	+	Improved employment / accessibility to jobs.
4. To create and maintain safer and more secure communities.	+	Potential for improvement through regeneration.
5. To minimise the harm from flooding.	+	Potential for improvement through regeneration. Sequential testing should be carried out, particularly for Redhill.
6. To improve accessibility to all services and facilities.	+	Potential for improvement through regeneration.
7. To make the best use of previously developed land and existing buildings.	+	Priority Regeneration Areas directs development to built up area, best use determined by evidence base.
8. To reduce land contamination and safeguard soil quality and quantity.	+	Potential for improvement through regeneration. No issue with soil as PDL.
9. To ensure air quality continues to improve.	--	Potentially as issue – Redhill declared AQMA on roads surrounding town centre*. This will need to be addressed, as increases in traffic will negatively impact on this designation.
10. To reduce noise pollution.	0	Potential increase but could be mitigated through design.
11. To reduce light pollution.	0	Potential increase but could be mitigated through design.
12. To maintain and improve the water quality of the region's rivers and groundwater	+	Potential for improvement through regeneration.
13. To conserve and enhance biodiversity within the plan area	+	Potential for improvement through regeneration.
14. To protect and enhance the natural, archaeological, historic environments and cultural assets	+	Potential for improvement through regeneration.
15. To reduce road congestion and the need to travel	--	See comments on SA obj.9
16. To reduce greenhouse gases	-	Design can alleviate greenhouse gases through heating, but modal shift will be required away from car use if Redhill becomes key commercial location.
17. To ensure that the District is prepared for the impacts of climate change	+	Potential for improvement through regeneration.
18. Provide for employment opportunities	++	More accessible employment opportunities.
19. Make land available to meet the needs of the economy	++	
20. Support economic growth which is inclusive, innovative and sustainable	++	
21. To achieve sustainable production and use of resources	?	
22. To increase energy efficiency of new and existing development.	+?	Potential for improvement through regeneration.
23. To increase the production and use of renewable energy.	+?	Potential for improvement through regeneration. An energy strategy can be brought forward as part of the RAAP.

Summary:
* Cromwell Road, Queensway, A25 Redstone Hill between A23 junction and Hillfield Rd, and A23 Brighton Rd, Marketfield Way and Princess Way.

There is no fundamental change in strategy from the previous CS appraisal; Redhill was deemed an appropriate location to improve as a commercial centre in previous drafts. Social and environmental improvements by virtue of regeneration scores positively, this would be particularly favourable if these improvements were coordinated by the Green Infrastructure Strategy and the benefits this would bring in terms of climate change, health and wellbeing, biodiversity etc. Renewable energy/low carbon energy should be considered as part of the regeneration package. Sequential testing is key to guiding development in Redhill; regeneration may give the opportunity to improve flood attenuation in existing areas of flood risk.

Policy CS3 – Valued People

b. **Sustaining those areas of the Borough which already prosper by <u>supporting communities</u> and improving infrastructure and community facilities.**

SA Objective	Assessment	Comments\Proposed Mitigation
2. To facilitate the improved health and wellbeing of the whole population.	++	Community support in addition to facilities.
3. To reduce poverty and social exclusion.	++	Community support in addition to facilities.

Summary:
Only SA objective 2 and 3 are relevant to part b of CS3.
Community support in addition to facilities.

Policy CS3 – Valued People

c. **<u>Recognising and nurturing the distinctive economic role of different parts of the Borough and working with adjoining authorities and other partners to maximise the opportunities arising from its position within the Gatwick Diamond, the Coast to Capital Local Enterprise Partnership and its proximity to London.</u>**

g. ~~Work with partners including Local Authorities, the Regional Development Agency and Government to promote a prosperous Gatwick Diamond within the legal limits established in the Gatwick Airport masterplan~~

SA Objective	Assessment	Comments\Proposed Mitigation
18. Provide for employment opportunities	++	Recognition of distinct economic roles.
19. Make land available to meet the needs of the economy	++	
20. Support economic growth which is inclusive, innovative and sustainable	++	

Summary: No change in terms of sustainability outcomes, recommendations or suggested mitigation from submission appraisal (Nov 2008)

Policy CS3 – Valued People

    d. **Ensuring a range of types and sizes of employment premises to provide for forecast future needs and cater for established, growing and start-up businesses; and ensuring sufficient flexibility to meet the changing needs of existing businesses and attract new businesses.**

    h. ~~Support existing businesses to ensure their continued success and in particular, develop policies which encourage the retention of, and opportunities for further growth of, Small to Medium-sized Enterprises; and~~

SA Objective	Assessment	Comments\Proposed Mitigation
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	0	
2. To facilitate the improved health and wellbeing of the whole population.	0	
3. To reduce poverty and social exclusion.	+	
4. To create and maintain safer and more secure communities.	0	
5. To minimise the harm from flooding.	0	
15. To reduce road congestion and the need to travel	+	Local jobs will reduce the need to travel.
16. To reduce greenhouse gases	+	As above
18. Provide for employment opportunities	++	
19. Make land available to meet the needs of the economy	++	
20. Support economic growth which is inclusive, innovative and sustainable	++	

Summary:
Flexibility of employment premises to meet the needs to existing and attract new businesses will support a buoyant economy in the area. The provision of jobs will support social objectives as well as economic ones. No change in terms of sustainability outcomes, recommendations or suggested mitigation from submission appraisal (Nov 2008)

Policy CS3 – Valued People

    e. **Focusing on making the best use of employment land within existing town centres and industrial areas and ensuring that any new employment development outside these areas reflects wider regeneration priorities and is located in accordance with the development hierarchy.**

    i. ~~Identify the sites needed to provide for the future major office and industrial development needs of the Borough.~~

SA Objective	Assessment	Comments\Proposed Mitigation
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	+	Making best use of existing employment land and town centres will reduce the pressure on housing land.
2. To facilitate the improved health and wellbeing of the whole population.	0	
3. To reduce poverty and social exclusion.	0	
4. To create and maintain safer and more secure communities.	0	
5. To minimise the harm from flooding.	+	Best use of employment land in town and industrial areas will reduce pressure on greenfield land which will play positive role in attenuating flood risk. Sequential land allocation is key in directing development to areas of lesser flood risk.
6. To improve accessibility to all services and facilities.	+	
7. To make the best use of previously developed land and existing buildings.	++	
8. To reduce land contamination and safeguard soil quality and quantity.	+	

SA Objective	Assessment	Comments\Proposed Mitigation
9. To ensure air quality continues to improve.	0	Existing industrial areas are not all in areas easily accessible by public transport. Although directing development according to hierarchy will generally be near public transport e.g. town centres.
10. To reduce noise pollution.	NA	
11. To reduce light pollution.	NA	
12. To maintain and improve the water quality of the region's rivers and groundwater	NA	
13. To conserve and enhance biodiversity within the plan area	+	Previously developed employment land and town centres will reduce pressure on green field land.
14. To protect and enhance the natural, archaeological, historic environments and cultural assets	+	Previously developed employment land and town centres will reduce pressure on green field land.
15. To reduce road congestion and the need to travel	0	Existing industrial areas are not all in areas easily accessible by public transport. Although directing development according to hierarchy will generally be near public transport e.g. town centres.
16. To reduce greenhouse gases	0	Existing industrial areas are not all in areas easily accessible by public transport. Although directing development according to hierarchy will generally be near public transport e.g. town centres.
17. To ensure that the District is prepared for the impacts of climate change	0	
18. Provide for employment opportunities	++	
19. Make land available to meet the needs of the economy	++	
20. Support economic growth which is inclusive, innovative and sustainable	++	
21. To achieve sustainable production and use of resources	+	
22. To increase energy efficiency of new and existing development.	+	Intensification of existing employment sites/ town centres / regeneration areas may make CHP more viable.
23. To increase the production and use of renewable energy.	NA	

Summary:
Making best use of existing employment land and town centres will reduce the pressure on housing land. Best use of employment land in town and industrial areas will reduce pressure on greenfield land which will play positive role in attenuating flood risk. Sequential land allocation is key in directing development to areas of lesser flood risk. Previously developed employment land and town centres will reduce pressure on green field land. Intensification of existing employment sites/ town centres / regeneration areas may make CHP more viable.

Policy CS3 – Valued People

    f. **Supporting entrepreneurship and innovation by facilitating the provision of affordable start-up/incubator units in the most accessible locations.**

SA Objective	Assessment	Comments\Proposed Mitigation
3. To reduce poverty and social exclusion.	++	Affordable opportunities for start-up businesses in accessible locations.
9. To ensure air quality continues to improve.	+	Accessible locations
15. To reduce road congestion and the need to travel	++	Accessible locations
18. Provide for employment opportunities	++	
19. Make land available to meet the needs of the economy	++	
20. Support economic growth which is inclusive, innovative and sustainable	++	

Summary: Strongly supports economic growth and social objectives of reducing poverty and social exclusion. No change in terms of sustainability outcomes, recommendations or suggested mitigation from that published in submission appraisal report (Nov 2008)

Policy CS3 – Valued People
Implementation: This policy will be implemented through:

- ~~Sub-regional partnership~~ Cross boundary working, ~~across Gatwick and London Fringe sub-regions~~ including through the Gatwick Diamond Initiative, Coast to Capital Local Enterprise Partnership and Surrey Connects Local Enterprise Partnership,
- Partnership working with Surrey County Council, the Primary Care Trust and others to deliver the Sustainable Community Strategy and other shared strategic priorities ~~via the Reigate Partnership and Surrey Strategic partnership also contributing to Local Area Agreement targets~~, including through the Public Sector Board;
- ~~New governance arrangements for the Reigate & Banstead Partnership (LSP) in place by 2009;~~
- Development Management ~~and Site Allocations~~ Policies Development Plan Document ~~(completed by 2012);~~
- Adopted Planning Obligations and Infrastructure Contributions SPD;
- Consideration and determination of planning applications and appeals
- Where appropriate, Local Development Orders or other similar mechanisms to promote growth and enterprise at particular locations.

Where appropriate, Area Action Plans or SPD to deal with strategic proposals for the major gain or loss of employment provision or the loss of key employers.

SA Objective	Assessment			Comments\Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.				
2. To facilitate the improved health and wellbeing of the whole population.				
3. To reduce poverty and social exclusion.				
4. To create and maintain safer and more secure communities.				
5. To minimise the harm from flooding.				LDOs should be used to promote growth only in areas not at risk from flooding, or where flood risk mitigation can be adequately employed.
6. To improve accessibility to all services and facilities.				LDOs should be used to promote growth only in accessible areas.
7. To make the best use of previously developed land and existing buildings.				LDOs should be used to promote growth only in previously developed areas.
8. To reduce land contamination and safeguard soil quality and quantity.				LDOs should be used to promote growth only in previously developed areas.
9. To ensure air quality continues to improve.				LDOs should be used to promote growth only in accessible areas.
10. To reduce noise pollution.				
11. To reduce light pollution.				
12. To maintain and improve the water quality of the region's rivers and groundwater				
13. To conserve and enhance biodiversity within the plan area				LDOs should be used to promote growth only in previously developed areas.
14. To protect and enhance the natural, archaeological, historic environments and cultural assets				LDOs should be used to promote growth only in previously developed areas.
15. To reduce road congestion and the need to travel				LDOs should be used to promote growth only in accessible areas.

16. To reduce greenhouse gases				LDOs should be used to promote growth only in accessible areas.
17. To ensure that the District is prepared for the impacts of climate change				LDOs should incorporate design requirements to future proof development from climate change.
18. Provide for employment opportunities		++		
19. Make land available to meet the needs of the economy		++		
20. Support economic growth which is inclusive, innovative and sustainable		++		
21. To achieve sustainable production and use of resources				LDOs/AAPs should encourage the sustainable production and use of resources.
22. To increase energy efficiency of new and existing development.				LDOs/AAPs should encourage increased energy efficiency in new and existing development. Feasibility of CHP should be determined.
23. To increase the production and use of renewable energy.				LDOs should incorporate design requirements to increase the production and use of renewable energy.

Summary:
The use of LDOs is positive in terms of economic growth and give opportunities for incorporating flood risk mitigation, energy efficient design, production of renewable energy, sustainable use of resources, and can be directed to accessible and previously developed areas.

Area 1: North Downs

1. Housing: …Collectively, the settlements will provide for <u>at least</u> ~~approximately~~ ~~1,730~~ <u>845</u> residential units <u>for the period 2011-2021. Beyond 2021, additional housing growth will be delivered in one or more broad locations across the borough.</u> Housing will primarily be for families and delivered on smaller sites on a windfall basis, or through small-site allocations. Specific sites identified by the Council will be allocated <u>through the Development Management Policies DPD</u> and development density and type will be informed by local character and need. ~~Opportunities for further residential development may emerge as part of the Council"s Development Management and Site Allocation DPD (DMSADPD), scheduled for completion in 2012.~~

2. Employment: This area has ~~two designated employment areas~~<u>limited employment provision, focused at</u> Waterhouse Lane and Pitwood Park <u>and a small number of single owner office sites. No major new employment development is planned for this area, although Waterhouse Lane and Pitwood Park</u> ~~Both of these locations~~ <u>both show some</u> ~~have the~~ potential <u>for intensification subject to the preservation of the character of surrounding areas</u> ~~to increase employment floorspace through intensification to help meet the employment needs of the Borough over the Plan period. Specific additional employment floorspace levels will be allocated as determined appropriate through the DMSADPD.~~ <u>Development Management Policies will confirm employment land designations for this area. For monitoring purposes, a target of up to 2,000sqm has been identified for Area 1.</u>

3. Retail: … It is anticipated this will be reviewed regularly over the Plan period to ensure that the centre <u>maintains its position in the retail hierarchy and</u> fulfils its role as the principal town centre location for the area.

4. Regeneration: Preston is the focus for regeneration in this area … an estimated ~~400~~ <u>510</u> housing units will be delivered by 202<u>1</u>~~16~~. Further opportunities for improved community and leisure facilities are envisaged as part of this regeneration programme.

5. Future Expansion Potential: ~~The emerging RSS (Secretary of State's response) directs that a Green Belt Review may be needed around Redhill to accommodate higher housing allocations. The Council will undertake a Green Belt Review for the whole area of the Borough, including Area 1.~~ In Area 1, the Green Belt is constrained and forms a vital strategic gap between the outer suburbs of London and the towns and settlements beyond. It is anticipated that the urban areas in Area 1 will not experience expansion beyond small-scale re-use and consolidation of sites in the built up area during the life of the Strategy<u>, however specific site allocations will be informed by a borough-wide Green Belt Review</u>.

<u>6. Infrastructure: Infrastructure requirements in this area are generally based upon improving existing infrastructure and ensuring that development is directed to locations that are already well served by existing services or those that can be upgraded. Traffic congestion will be addressed through the improvement of alternative transport options to reduce the need to use the car. The regeneration of Preston requires the improvement of infrastructure to meet the needs of the existing residents and new infrastructure to meet the needs of new development. A comprehensive redevelopment including the provision of a focus "community hub" is proposed to meet most of these requirements.</u>

Summary
Housing to 2021*:

Preston Regeneration Area	540
Large sites with permission in the urban area	204
Other sites in the urban area with permission	61
Other sites in the urban area as identified through the SHLAA	40
Total housing	845

Beyond 2021, housing growth will be delivered in one or more broad locations across the borough.

Employment: Employment development will be accommodated through intensification and re-use of existing employment sites.
Retail: Limited additional retail floorspace will be developed in Banstead to ensure it maintains its current role.

<u>Infrastructure priorities</u>
New leisure and community hub facility (Preston Regeneration Area).
Transport improvements in and around Preston Regeneration Area.
Highway improvements to A217/A240 junction.

SA Objective	Assessment			Comments\Proposed Mitigation
	Short Term	Medium Term	Long Term	

1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.		-		The housing figure is slightly lower, but within a shorter time frame, with additional future housing being directed to other areas of the Borough. Although housing growth is likely to be significant across the Borough, this area in particular shows low housing growth (in line with overall strategy for the Borough). The regeneration of Preston will provide suitable housing and will be appraised in detail as part of the Preston Planning Framework (PPF).
2. To facilitate the improved health and wellbeing of the whole population.		++		New leisure centre
3. To reduce poverty and social exclusion.		+		Improvement of alternative transport options to the car will score positively against this objective, as improvements to public transport will benefit those without access to a vehicle.
4. To create and maintain safer and more secure communities.		0		Addressed through PPF.
5. To minimise the harm from flooding.		0		Preston groundwater issues should be addressed through PPF.
6. To improve accessibility to all services and facilities.		++		Improvement to public transport, provision of leisure centre and community hub.
7. To make the best use of previously developed land and existing buildings.		+		Development directed to regeneration area (Preston) and employment accommodated through intensification of existing sites.
8. To reduce land contamination and safeguard soil quality and quantity.		+		Employment accommodated through intensification of existing sites, therefore reducing the need to develop on, and possible contaminate, green field sites.
9. To ensure air quality continues to improve.		0		Provision of facilities close to dwellings will reduce the need to travel, but limited employment growth in the area will balance this out and could create travel demand. Air quality improvements through energy efficiency in Preston will be appraised through PPF.
10. To reduce noise pollution.		0		
11. To reduce light pollution.		0		
12. To maintain and improve the water quality of the region's rivers and groundwater		0		
13. To conserve and enhance biodiversity within the plan area		+		Regeneration and intensification will reduce impacts on green field sites in the area.
14. To protect and enhance the natural, archaeological, historic environments and cultural assets		+		Regeneration and intensification will reduce impacts on green field sites in the area.
15. To reduce road congestion and the need to travel		0		Provision of facilities close to dwellings will reduce the need to travel, but limited employment in the area will balance this out and create travel demand
16. To reduce greenhouse gases				As above
17. To ensure that the District is prepared for the impacts of climate change		0		
18. Provide for employment opportunities		-		Limited employment growth opportunities in area 1

19. Make land available to meet the needs of the economy		-		No additional land available for economic use, although limited growth will occur through intensification and re-use.
20. Support economic growth which is inclusive, innovative and sustainable		-		Does not support significant economic growth in this area (in line with planned hierarchy of commercial / employment centres for the Borough)
21. To achieve sustainable production and use of resources		+		Intensification / re-use / regeneration present the opportunity for this.
22. To increase energy efficiency of new and existing development.		+		Intensification / re-use / regeneration present the opportunity for this.
23. To increase the production and use of renewable energy.		+		Intensification / re-use / regeneration present the opportunity for this.

Summary:
Planned regeneration and the intensification and re-use of employment land in this area presents opportunities for energy efficiency measures and renewable energy improvements. Improvements to public transport score positively against economic and environmental objectives, and are particularly advantageous for social inclusion. Demand for travel can be reduced through the provision of leisure and community facilities; however this is not coupled with an increase in local employment opportunities which would benefit this objective. The lower housing figure in this area scores negatively against the objective of housing provision, however this is in line with the planned spatial pattern of housing development across the Borough and the concept of housing provision in more accessible locations. The lack of employment growth in the area scores negatively against economic objectives, and if improved would give additional sustainability credentials to the social impacts of the PPF. The planned intensification of existing employment land rather than developing new areas for employment is in line with the planned spatial pattern of development across the Borough, and the protection of landscape and nature conservation areas; this approach scores favourably against environmental objectives

Area 2a: Redhill

1. Housing: Redhill Town Centre ~~will~~ has the potential to provide ~~for 1000~~ up to 750 new housing units between 2011 and 2021. … an additional ~~2750~~ 490 units will be constructed in the built-up areas of Area 2a ~~Redhill~~ over the Plan period to 2021~~6~~. … Beyond 2021, additional housing growth will be delivered in one or more broad locations across the borough.

2. Employment: As the main urban centre in the Borough and a centre for significant change, Redhill will be a focus for employment development, with the Town Centre being a ~~the~~ key location for additional office space of up to 7,000sqm (net) to enhance the role of Redhill as a commercial destination. ~~The Council has identified a need for an additional 2 ha of office employment land over the Plan period for the whole of the Borough. Whilst some of this will be specifically allocated to Redhill in the Area Action Plan, or through the DMSADPD, this is not expected to be significant.~~ There are also a number of other employment areas in Area 2a – these offer some potential for reuse/intensification for other commercial uses. Sites for office development within, and an indicative job target for, Redhill Town Centre will be identified through the AAP process. The Development Management Policies DPD will confirm employment designations elsewhere in Area 2a. For monitoring purposes, a target of 12,500sqm of employment floorspace has been identified for Area 2a and Area 2b together (excluding Redhill Town Centre).

3. Retail: As a primary shopping centre, Redhill caters for local needs and Borough-wide needs. ~~Retail and Leisure Needs Assessment 2007. It is anticipated these figures will be reviewed frequently to ensure that the centre has the best opportunity for regeneration and for fulfilling its role as a Primary Shopping Centre for the Borough and beyond.~~ As outlined above, the majority of both comparison and convenience retail development in the Borough will be accommodated in Redhill. The AAP will plan for and allocate sites to provide the identified additional retail floorspace. Retail provision figures will be reviewed regularly to ensure opportunities for regeneration within the Town Centre – and Redhill's potential as a primary shopping centre for the Borough and beyond – are realised. To support the development of Redhill's regional role, other complementary uses, such as leisure, need to be delivered. The RAAP will set out the amount and type of leisure provision required in the town centre.

4. Regeneration: Redhill Town Centre and Merstham have been identified as Regeneration Areas. ~~Further opportunities for improved community facilities are also envisaged as part of the Council's *Programme of Development*.~~ …. There is the opportunity to generate significant jobs and training opportunities to help benefit the local community. ~~The development will involve innovative environmental design and public realm improvements as well as sustainable development initiatives such as a local stand alone renewable energy scheme.~~ …

5. Future expansion potential: ~~The emerging RSS (Secretary of State's response) directs that a Green Belt Review may be needed around Redhill to accommodate higher housing allocations.~~ It may be necessary to find additional sites for housing if insufficient sites arise from within existing built-up areas, however, at this stage no decision has been reached about the location of any potential Green Belt release or specific sites. The Council will undertake a Green Belt Review for the whole area of the Borough, ~~including Redhill by 2012 as part of the Development Management and Site Allocation DPD process~~. This review will determine whether – should it be required - small scale of Green Belt around Redhill would be appropriate. ~~if there is capability,~~ and ~~sufficient capacity for future growth.~~

6. Infrastructure: Infrastructure requirements in this area are generally based upon existing infrastructure and ensuring development is directed to locations that are already well served by existing services or those that can be upgraded. Redhill will require some key improvements to the transport infrastructure, flood attenuation works and relocation of essential community facilities to ensure the Town Centre fulfils its potential. The AAP will plan for, and identify funding sources to deliver, the necessary infrastructure. The infrastructure required for Merstham regeneration area will primarily take the form of a new community hub. The Development Management Policies DPD will provide further detail on the infrastructure proposals for elsewhere in the area.

Summary

Housing to 2021*: Redhill Town Centre (sites without permission)	542
Merstham Regeneration Area	38
Large sites with permission in the urban area	459
Other sites in the urban area with permission	86
Other sites in the urban area as identified through the SHLAA	114
Total housing units	1,239

Beyond 2021, housing growth will be delivered in one or more broad locations across the borough.

Employment: Significant jobs and training opportunities will be provided through redevelopment of key sites in Redhill (through RAAP)

Retail: Significant retail growth in Redhill will contribute to the town centre increasing its market share for both comparison and convenience goods (through RAAP)

Infrastructure priorities

Flood attenuation works upstream of Redhill Town Centre in Memorial Park; Major traffic improvements and management measures in Redhill Town Centre; Relocation of community facilities from Cromwell Road; New 2-form entry primary school New 6-form entry secondary school; Expansion of existing primary schools in Redhill/Reigate area – at least 1-form entry.; Merstham Community Hub; Earlswood Depot waste processing facility; Merstham Sewage Treatment Works

SA Objective	Assessment			Comments\Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.		+		Although a slight reduction from previous housing figures, this is over a shorter time frame.
2. To facilitate the improved health and wellbeing of the whole population.		0		
3. To reduce poverty and social exclusion.		+		Through provision of housing and community hub at Merstham.
4. To create and maintain safer and more secure communities.		0		This will be addressed through the Redhill Area Action Plan (RAAP)
5. To minimise the harm from flooding.		+		Flood attenuation works. Sequential testing must be used to determine development locations. Flooding work on Redhill is being carried out in conjunction with the RAAP.
6. To improve accessibility to all services and facilities.		++		Provision of new schools and community hub in Merstham.
7. To make the best use of previously developed land and existing buildings.		+	?	Development is in the first instance directed to previously developed areas.
8. To reduce land contamination and safeguard soil quality and quantity.		+	?	Development is in the first instance directed to previously developed areas.
9. To ensure air quality continues to improve.		++		Through directing development to area highly accessible by public transport. Provision of adequate number of school places will reduce travel. Also see energy efficiency comment.
10. To reduce noise pollution.		0		No change to this comment from Submission SAR (Nov 2008) There are potential noise issues with intensification of the urban area – these must be addressed through design.
11. To reduce light pollution.		0		No change to this comment from Submission SAR (Nov 2008) There are potential light issues with intensification of the urban area – these must be addressed through design.
12. To maintain and improve the water quality of the region's rivers and groundwater		0		No change to this comment from Submission SAR (Nov 2008) There are potential water quality issues with intensification of the urban area – these must be addressed through design
13. To conserve and enhance biodiversity within the plan area		0	?-	There is potential to design in additional habitats into the urban area. This should be addressed through the RAAP and CS2.
14. To protect and enhance the natural, archaeological, historic environments and cultural assets		+	?-	Intensification of the urban area will reduce pressure on green field land.
15. To reduce road congestion and the need to travel		++		Improvements to public transport and location of development. Provision of adequate number of school places will reduce travel
16. To reduce greenhouse gases		+		As above. Potential to reduce CO_2 emissions through energy efficient design of buildings.
17. To ensure that the District is prepared for the impacts of climate change		+		Flood attenuation works.
18. Provide for employment opportunities		++		
19. Make land available to meet the needs of the economy		++		

20. Support economic growth which is inclusive, innovative and sustainable		++		
21. To achieve sustainable production and use of resources		+		Waste processing facility will aid recycling.
22. To increase energy efficiency of new and existing development.		++		Potential exists, in the new schools in particular. The density of urban development may make CHP in certain area more viable.
23. To increase the production and use of renewable energy.		++		Potential exists, in the new schools in particular.

Summary:
There is no change in the overall strategy of urban intensification in the area and the hierarchy of towns placing Redhill at the top, this has been appraised and can be seen in the submission SAR (November 2008). This appraisal highlighted concerns of flooding, noise, light and green space which are to be addressed specifically in the RAAP through design. The approach for this area scored positively in terms of congestion, reduction of travel (and associated pollution), use of PDL, and across all economic and energy/resource objectives. The issue of habitat creation in the urban area needs to be addressed in policy CS2.

Area 2b: Reigate and the remainder of area 2.

1. Housing: Reigate and the rest of the urban area will provide for ~~775~~ 253 new housing units <u>between 2011 and 2021.</u> ~~by 2026~~. <u>The priority will be for these to</u> . ~~All of these will~~ be built in the existing built-up area in varying densities according to local character and accessibility. Reigate Town Centre, although identified as a sustainable location, is constrained by its designation as a conservation area, so <u>has only</u> limited development potential ~~is possible~~. <u>Beyond 2021, additional housing growth will be delivered in one or more broad locations across the borough.</u>

2. Employment: Reigate is a strategically important employment location in the Borough <u>particularly for office uses. There is some scope within the Town Centre for intensification of office uses, subject to the constraints of the Conservation Area designation. Elsewhere in the Area there is a limited amount of employment land, again with some limited scope for reuse and intensification for commercial uses.</u> ~~The Council has identified a need for an additional 2 hectares of employment land across the Borough over the Plan period. Whilst some of this may be specifically allocated to Reigate through the DMSADPD, this is not expected to be significant.~~ <u>Development Management Policies will confirm employment land designations for this area. For monitoring purposes, a target of 12,500sqm of employment floorspace has been identified for Area 2a and Area 2b together (excluding Redhill Town Centre).</u>

5. Future expansion potential: ~~The emerging RSS (Secretary of State's response) directs that a Green Belt Review may be needed around Redhill to accommodate higher housing allocations.~~ <u>It may be necessary to find additional sites for housing if insufficient sites arise from within existing built-up areas, however, at this stage no decision has been reached about the location of any potential Green Belt release or specific sites.</u> The Council will undertake a Green Belt Review for the whole area of the Borough, ~~including Reigate by 2012 as part of the Development Management and Site Allocation DPD process~~. This review will determine <u>whether – should it be required - small scale of Green Belt around Reigate would be appropriate.</u> ~~if there is capability,~~ ~~and sufficient capacity for future growth.~~

<u>6. Infrastructure: Infrastructure requirements in this area are generally based upon improving existing infrastructure and ensuring that development is directed to locations that are already well served by existing services or those that can be upgraded. Traffic congestion will be addressed through the improvement of alternative transport options to reduce the need to use the car.</u>

Summary
Housing*   Large sites with permission in the urban area   146
                  Other sites in the urban area with permission   71
                  Other sites in the urban area as identified through the SHLAA   36
                  Total housing units   253
*Beyond 2021, housing growth will be delivered in one or more broad locations across the borough.

Employment: Employment development will be accommodated through intensification and re-use of existing employment sites. Additional commercial floorspace across Area 2a (excluding Redhill Town Centre) and Area 2b (up to 12,500 sqm)
Retail: Limited additional retail floorspace will be developed to ensure Reigate maintains its current role.

Infrastructure priorities
Expansion of existing primary schools in Redhill/Reigate area – at least 1-form entry.
Expansion of water treatment works at reservoir outside the Borough (NB this requirement for development across the Borough).

SA Objective	Assessment			Comments\Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.		-		The housing figure is slightly lower (but over a shorter time frame), with additional future housing being directed to other areas of the Borough. Although housing growth is likely to be significant across the Borough it is restricted by the conservation area in Reigate town centre.
2. To facilitate the improved health and wellbeing of the whole population.		0		
3. To reduce poverty and social exclusion.		+		Improvement of alternative transport options to the car will score positively against this objective, as improvements to public transport will benefit those without access to a vehicle.

4. To create and maintain safer and more secure communities.		0		
5. To minimise the harm from flooding.		0		
6. To improve accessibility to all services and facilities.		+		Improvement to public transport, ensuring development is directed to locations well served by existing services.
7. To make the best use of previously developed land and existing buildings.		+		Intensification of office use
8. To reduce land contamination and safeguard soil quality and quantity.		+		Employment accommodated through intensification of existing sites
9. To ensure air quality continues to improve.		+		Provision of adequate school places in the area will reduce the need to travel.
10. To reduce noise pollution.		0		
11. To reduce light pollution.		0		
12. To maintain and improve the water quality of the region's rivers and groundwater		0		
13. To conserve and enhance biodiversity within the plan area		+		Intensification will reduce impacts on green field sites in the area.
14. To protect and enhance the natural, archaeological, historic environments and cultural assets		+		Protection of conservation area designation.
15. To reduce road congestion and the need to travel		+		Provision of adequate school places in the area will reduce the need to travel.
16. To reduce greenhouse gases				As above
17. To ensure that the District is prepared for the impacts of climate change		0		
18. Provide for employment opportunities		0		Does not increase employment opportunities
19. Make land available to meet the needs of the economy		-		No new land available for economic use, although intensification and re-use.
20. Support economic growth which is inclusive, innovative and sustainable		0		
21. To achieve sustainable production and use of resources		+		Intensification / re-use present the opportunity for this.
22. To increase energy efficiency of new and existing development.		+		Intensification / re-use present the opportunity for this.
23. To increase the production and use of renewable energy.		+		Intensification / re-use present the opportunity for this.

Summary:. There is no change in the overall strategy of development for the area and the hierarchy of towns, this has been appraised and can be seen in the submission SAR (November 2008). The intensification of office use scores positively in terms of use of previously developed land but is not making land available for the needs of the economy. This approach follows the overall strategy of directing development to areas well served by existing services or those that can be upgraded and scores well under the objectives of air quality and reducing the need to travel.

Area 3: Low weald

1. Housing: Horley will provide for ~~3,000~~ 2,200 new housing units <u>between 2011 and 2021</u> ~~by 2026~~. The majority of development will be in the two planned new neighbourhoods to the north-east and north-west of the town. ~~In line with the town centre regeneration proposals, and to encourage an active town centre, it is estimated 285 housing units will be delivered up to 2026~~7 ~~in the town centre as part of mixed-use development schemes.~~ <u>Beyond 2021, the North West sector will be completed: in addition housing growth will be delivered in one or more broad locations across the borough.</u>

2. Employment: There are <u>two distinct employment sub-areas within Area 3: the Salfords industrial areas, which provide a range of mostly larger light industrial and warehousing space, and the Horley areas, which provide smaller units accommodating a range of uses.</u> ~~four employment areas in this Area, which are all served by good transport links and by the local bus routes to Horley train station. The employment areas are: two areas for small business and an industrial estate on Balcombe Road in Horley and the industrial estate in Salfords on the A23 Brighton Road. The Council has identified a need for an additional 2 ha of employment land over the Plan period.~~ <u>Development Management Policies will confirm employment land designations for this area. For monitoring purposes, a target of 24,000sqm of employment floorspace has been identified for Area 3. Start up units of small to medium size will be directed to the Horley area through policies in the DMPDPD and site allocations.</u>

5. Future expansion potential: Horley is the largest built-up area in Area 3 and once the new neighbourhoods are developed there will be little scope for further expansion due to the flooding, and noise and air quality constraint areas adjacent to the town. <u>The Council will undertake a Green Belt Review for the whole area of the Borough, including Area 3.</u> ~~The Council's Green Belt Review of the Borough will consider other development areas including the employment areas at Salfords as part of the DMSADPD process.~~ This review will determine <u>whether – should it be required – small scale release of Green Belt adjoining the urban area in Area 3 would be appropriate</u> ~~if there is capability, and sufficient capacity, for future growth demands resulting from the emerging RSS housing and employment allocations.~~

<u>6. Infrastructure: Infrastructure requirements in this area are generally based upon improving existing infrastructure and ensuring that development is directed to locations that are already well served by existing services or those that can be upgraded. Traffic congestion will be addressed through the improvement of alternative transport options to reduce the need to use the car. There is a comprehensive plan to provide new infrastructure to meet the needs of the development in the planned new neighbourhoods in the North East and North West sectors.</u>

Summary

Housing to 2021*

NE Horley		*535*
NW Horley		*1570*
Large sites with permission in the urban area	*70*	
Other sites in the urban area with permission	*47*	
Other sites in the urban area as identified through the SHLAA	*160*	
Total housing units		*2,382*

*Beyond 2021, housing growth will be delivered in one or more broad locations across the borough.

Employment: Employment development will be accommodated through intensification and re-use of existing employment sites.

Retail: Limited additional retail floorspace will be developed to ensure Horley maintains its current role and meets the needs of the growing population.

Infrastructure priorities

Drainage and flood prevention measures to allow the development of the NE and NW sectors.
New access routes to NE and NW sector.
Provision of a comprehensive playing space for sport facility in preferably one or two locations.
Riverside Green Chain open space and/or permissive public access linking the chain.
Two new neighbourhood centres and community facilities in the NE and NW sectors.
Playspace and play facilities within the NE and NW sectors.
Provision of two new 1-form entry primary schools
Enhancement to Oakwood Secondary School
New leisure centre
Bus priority route corridor, bus/rail interchange and enhanced bus service

SA Objective	Assessment			Comments\Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.		+		Although a slight reduction from previous housing figures, this is over a shorter time frame.

2. To facilitate the improved health and wellbeing of the whole population.		++		New leisure centre, play space and play facilities in NE and NW sectors and riverside green chain.
3. To reduce poverty and social exclusion.		+		See economic comments.
4. To create and maintain safer and more secure communities.		+		New access routes to NE and NW sector.
5. To minimise the harm from flooding.		-		Development in Horley should follow sequential testing guidance to avoid development in areas of high flood risk, and should avoid downstream flooding issues. Drainage and flood prevention measures to allow the development of the NE and NW sectors will alleviate this.
6. To improve accessibility to all services and facilities.		++		Provision of schools and leisure centre.
7. To make the best use of previously developed land and existing buildings.		+	?	Development should be directed to previously developed land in the first instance.
8. To reduce land contamination and safeguard soil quality and quantity.				See above
9. To ensure air quality continues to improve.		+		New facilities, schools, employment will reduce pollution from car emissions.
10. To reduce noise pollution.		0		
11. To reduce light pollution.		0		
12. To maintain and improve the water quality of the region's rivers and groundwater		-		This needs to be addressed through flood risk attenuation.
13. To conserve and enhance biodiversity within the plan area		+	?-	There is potential to design in additional habitats into the urban area. Protection of riverside green chain is positive.
14. To protect and enhance the natural, archaeological, historic environments and cultural assets		+	?-	Intensification of the urban area will reduce pressure on green field land. Protection of riverside green chain is positive.
15. To reduce road congestion and the need to travel		+		Improvements to public transport.
16. To reduce greenhouse gases		+		As above.
17. To ensure that the District is prepared for the impacts of climate change		0		This is potentially negative and must be mitigated by flood risk alleviation measures. Sequential testing must be used so as to avoid any areas at risk from flooding.
18. Provide for employment opportunities		++		
19. Make land available to meet the needs of the economy		++		Provision of smaller and start up units.
20. Support economic growth which is inclusive, innovative and sustainable		++		Provision of smaller and start up units.
21. To achieve sustainable production and use of resources		+		Potential in Horley sectors, including new schools.
22. To increase energy efficiency of new and existing development.		+		Potential in Horley sectors, including new schools.
23. To increase the production and use of renewable energy.		+		Potential in Horley sectors, including new schools.

Summary:
There are no significant changes to the development planned for Horley from the submission version SAR (November 2008) with most housing directed to the new sectors.
Sequential testing must be used to determine any development in the area so as to avoid any areas at risk from flooding. This approach scores positively in terms of economic and energy/resource objectives in addition to reducing the need to travel.