



Sustainability Appraisal Report

ADDENDUM TO SUBMISSION 2012 SA REPORT

Further amendments

November 2012

This document is an addendum to, and should be read in conjunction with, the Sustainability Appraisal report (Submission 2012). This addendum should not be read in isolation or considered as a stand-alone document.

Non technical summary

1. Background

- 1.1 Following the submission of the Core Strategy in May 2012 an Exploratory Meeting was held with the Inspector in August 2012. At this meeting it was decided that the Core Strategy Examination be suspended for 6 months pending further work and minor modifications to the plan. A number of changes have now been made to the Core Strategy document, including minor amendments, changes for clarification and major changes such as the Sustainable Urban Extension work. Following consideration of the changes made to the Core Strategy in the context of SA, the significant amendments have been appraised. This addendum presents the findings of this appraisal.

2. Role of Sustainability Appraisal

- 2.1 Sustainability Appraisal is a process designed to ensure that social, environmental and economic impacts are considered when formulating planning policies and proposals. The Core Strategy amendments have been assessed against a set of 19 Sustainability Appraisal Objectives (SA Objectives) in order to make recommendations regarding the sustainability of these changes. The objectives include protection of important habitats, protection of heritage interests, provision of affordable housing and the maintenance of a robust and flexible economy.
- 2.2 The set of SA Objectives provides the basis for an appraisal framework known as the Sustainability Appraisal Framework. These objectives were recently revised through the East Surrey working group and have been consulted on accordingly. Further details of the objectives are set out in the Core Strategy SA report (Submission 2012).

3. Sustainability Appraisal Methodology

3.1 Scoping report

- 3.1.1 A new revised borough-wide scoping report has been prepared and was consulted on for 6 weeks through August and September 2012. Comments were received and the report was revised accordingly. This scoping report was first used to appraise the Broad Areas of Search for the Sustainable Urban Extensions (SUE) work, and is included as Appendix C to the SUE SA report. The scoping report sets out the overall sustainability issues for the borough, and guides the weighting of the appraisal.

3.2 SA/SEA Framework

- 3.2.1 A framework and set of SA objectives were recently reviewed and revised by the East Surrey officers working group, and then following consultation with the statutory bodies

were further revised. There are now 19 SA objectives and these have been used for the changes to the Core Strategy, including the SUE work.

3.3 Appraisal

3.3.1 Appraisal of the Core Strategy has been carried out through a process of peer review within an East Surrey authorities working group including Tandridge, Mole Valley, Epsom & Ewell and Elmbridge. This work has been overseen and verified by an Independent Consultant. The group convened a series of meetings where potential impacts of different options were predicted by comparing the policies and proposals of the Core Strategy against the Sustainability Appraisal Framework.

3.3.2 The changes to the Core Strategy since submission 2012 have been appraised in-house by a team of officers. The findings of this post-submission appraisal can be found in this report.

4. Findings of the Sustainability Appraisal

4.1 A summary of the findings from this appraisal can be seen in the table below. For the full results matrices please see the next section of this addendum.

Change	Text	SA conclusion
Gypsies, travellers and travelling showpeople	<p><u>Para 7.7.1 The latest evidence of need is the East Surrey Gypsy and Traveller Accommodation Assessment (2007). This identifies a need for 57 Gypsy and Traveller pitches and nine plots for Travelling Showpeople across the East Surrey districts and boroughs. The draft Partial Review of the Regional Spatial Strategy for the South East: Provision for Gypsies, Travellers and Travelling Showpeople identified a need for nine pitches for Gypsies and Travellers and four plots for Travelling Showpeople to 2016. The Council is committed to updating the evidence base in relation to Traveller accommodation needs. Updated information about the level of need, and site allocations, will be included in the Development Management Policies DPD. This may change the level of provision needed in the borough. Information of the level of need as set out above is, however, the best available evidence at this time. Locally arising need will be met by allocating sufficient sites through the DMP document.</u>-(Clarification)</p> <p>Policy CS14 <u>The DMP will identify a local target for Gypsy, Traveller and Travelling Showpeople sites and make pProvision will be made for a five year supply of specific deliverable sites for Gypsies, Travellers and Travelling Showpeople to meet identified locally arising needs and broad locations for growth for years six to ten. The site can be integrated into the local area and co-exist with the local community.</u> d. <u>The site is not located in an area of high</u></p>	<p>A five year supply of sites will help to ensure authorised pitches and plots are available allowing access to healthcare and schools. Flood risk scores positively in terms of impact on the safety of the sites, but also the potential for increased surface run-off for neighbouring areas.</p> <p>Monitoring - There is potential for private sites to be sold to people from outside of the area, meaning although targets are met, the local population are still overcrowded or without an authorised site. Local need must be addressed as a priority, and consideration should be given to mechanisms for managing this through the DMP.</p>

	<p><u>risk of flooding, including functional floodplains.</u></p> <p><u>e. e. There is adequate local infrastructure and access to appropriate healthcare and local schools</u></p>	
Green Belt	<p><u>SO4 – addition of sentence ‘role of the Green Belt’ (Clarification)</u></p> <p><u>Para 5.1.13 Green Belt boundaries will only be altered in exceptional circumstances, and through the plan development process; further detail about this process is provided in section 6.2 and Policy CS1b Green Belt. (clarification)</u></p> <p><u>New Green Belt policy CS1b</u></p> <p><u>1. A robust and defensible Green Belt will be maintained to ensure that the coherence of the green fabric is protected and future growth is accommodated in a sustainable manner.</u></p> <p><u>2. Planning permission will not be granted for inappropriate development in the Green Belt unless very special circumstances clearly outweigh the potential harm to the Green Belt.</u></p> <p><u>3. Land may be removed from the Green Belt and allocated for development through the plan-making process, in order to secure the delivery of the objectives and policies of the Core Strategy and to identify options for meeting development needs beyond the plan period. Land will only be removed from the Green Belt where:</u></p> <p><u>a. Exceptional circumstances can be demonstrated; and</u></p> <p><u>b. The development proposed cannot be accommodated on land within the existing urban area or on land which is countryside beyond the Green Belt; or</u></p> <p><u>c. The development of land within the Green Belt would represent a significantly more sustainable option.</u></p> <p><u>4. The Council will undertake a Green Belt review to inform the Development Management Policies document and Proposals Map. This review will assess the contribution made by land to the purposes of the Green Belt and will also seek to:</u></p> <p><u>a. address existing boundary anomalies</u></p> <p><u>b review washed over and areas of land inset within the Green Belt</u></p> <p><u>c. ensure clearly defined and readily recognisable boundaries which are likely to be permanent and endure beyond the plan period.</u></p> <p><u>5. In accordance with (3) and (4) above, land required for development will be removed from the Green Belt and allocated or safeguarded through the Development Management Policies DPD. The release of</u></p>	<p>The policy provides clarity on the Council’s commitment to protect the GB and the spatial strategy to build in the urban area first. The policy is flexible enough to allow urban extensions to progress (see strategic locations for growth matrix). This policy scores well in terms of housing provision (to address need) and climate change (to avoid increased urban intensification, and building on flood risk areas) because of the flexibility in releasing some GB land in the longer term (exceptional circumstances). Much of the appraisal scoring was dependent on locations, as GB designation covers a large proportion of the borough (70%). This is picked up in the appraisal of Strategic Urban Extensions and is a separate document.</p>

	<p><u>land allocated for development will be determined through annual monitoring against identified trigger points. Safeguarded land will only be allocated through a subsequent Local Plan review and will be subject to Green Belt policy until that time.</u></p>	
Historic environment	<p><u>Para 3.12 The borough's townscapes and landscapes also therefore include a diverse range of heritage assets.</u> <u>SO6 – addition of 'historic' and 'heritage assets'</u> <u>5.2.7 – 'Heritage assets'</u> <u>Policy CS2 – renamed to include 'historic environment'</u> <u>1.e. Development will Bbe designed sensitively to respect, reflect local heritage and to protect, conserve, and enhance the historic environment, including heritage assets and their settings. Development proposals that would provide sensitive restoration and re-use for heritage assets as risk will be particularly encouraged.</u> <u>Policy CS8 – reference to historic environment</u></p>	<p>The strengthening of the wording of policy CS2 provides, as would be expected, positive scoring in relation to SA objective 13. Conflicts have been identified in relation to renewable energy and provision of affordable housing. These conflicts can be adequately addressed through the DMP with design guidance and issues of viability should be addressed on a site by site basis.</p>
Presumption in favour of sustainable development	<p><u>New policy</u> <u>1. In assessing and determining development proposals, the Council will apply the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will work proactively with applicants to secure development that improves the economic, social and environmental conditions in the area</u> <u>2. Unless material considerations indicate otherwise, proposed development that accords with policies in the development plan - including this Core Strategy (and where relevant with policies in neighbourhood plans) - will be approved without delay, and proposed development that conflicts with the development plan will be refused.</u> <u>3. Where there are no policies relevant to the application or where relevant policies are out of date at the time of making the decision the Council will grant permission unless:</u> <u>a. The adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against policies in the National Planning Policy Framework as a whole; or</u> <u>b. Specific policies in the National Planning Policy Framework indicate that development should be restricted; or</u> <u>c. Any other material considerations indicate otherwise.</u></p>	<p>This policy has been appraised from the viewpoint that if development is granted through use of this policy (presumption in favour of sustainable development) would the SA objectives be fulfilled. If proposed development that accords with policies in the development plan is granted then the majority of the SA objectives score positively, There are some negatives, such as land contamination, biodiversity and landscape, where by the nature of development there will be some impact, particularly in the longer term with SUEs, but the matrix indicates which policies in the CS aim to minimise these impacts.</p>
UOL review criteria	<p><u>Land designated as urban open land in accordance with the Reigate & Banstead</u></p>	<p>There are conflicts with land use highlighted in this</p>

	<p>Borough Local Plan 2005 will be reviewed through to inform the development of the GI Strategy and the DMP and Proposals Map, and the development of the GI Strategy, to ensure that open spaces continue to be given an appropriate level of protection in recognition of their public value for visual amenity, sports and recreation. Where appropriate, local green spaces may also be designated. The review should give consideration to the extent to which sites:</p> <ul style="list-style-type: none"> - contribute to landscape and townscape character - provide accessible open space, sport and recreation facilities - address deficiencies in open space provision - provide wider benefits including, but not limited to, biodiversity conservation and flood management. 	<p>appraisal; however the benefits to the existing population far outweigh these, such as health and wellbeing benefits, and climate change impacts.</p>
<p>Strategic locations for growth</p>	<p>Policy CS1a <u>and (except any areas allocated for development through the DMP)</u> (protection of green fabric) (Clarification of approach to urban extensions)</p> <p>Para 6.2.5 - <u>If unanticipated, but more sustainable, opportunities come forward in the urban area this may mean that the need for greenfield development is pushed back or that the scale is less than currently estimated; conversely, if identified opportunities fail to come forward, greenfield development may be required earlier in the plan period. Regular monitoring against identified 'trigger points' will ensure that greenfield sites are only released for development as a last resort, when other opportunities have been exhausted.</u></p> <p><u>Policy CS4</u></p> <p><u>2.4. The release of land adjoining the urban area will be needed to meet the housing requirements set out in Policy CS11, unless unanticipated opportunities arise within the urban area that align with (1) above. Broad geographic locations have been identified for urban extensions, in order of priority:</u></p> <ul style="list-style-type: none"> <u>i. Non-Green Belt land adjoining the urban area of Horley: small scale extensions</u> <u>ii. East of Redhill and East of Merstham</u> <u>iii. South and West of Reigate (Woodhatch)</u> <p><u>3. Sites (including for urban extensions) will be allocated in the Development Management Policies DPD, taking account of:</u></p> <ul style="list-style-type: none"> <u>• environmental and amenity value</u> <u>• localised constraints and opportunities,</u> <u>• the need to secure appropriate infrastructure/service provision; and</u> <u>• other relevant criteria as set out in Policy</u> 	<p>The significant changes to this policy have been appraised through the Strategic Urban Extensions work and can be seen in the corresponding SA report. The SUE SA report helped to suggest the broad areas that would be most suitable for strategic scale urban extensions. 2 of the suggested broad areas were East of Redhill and South and West of Reigate (Woodhatch) – these areas have been selected and taken forward as urban extensions. The rural surrounds of Horley have been taken forward because they are not Green Belt, and this land should be considered before Green Belt. The areas were not recommended by the SA as having potential to accommodate strategic urban extensions, but due to good accessibility small scale development opportunities were not ruled out. The appraisal of each of the broad areas highlighted mitigation that should be considered such as transport improvements and new school capacity. This has been addressed within the CS in the following paragraph</p>

	<p><u>CS8.</u></p> <p><u>4. The release of allocated sites adjoining the urban area will be determined through regular monitoring of identified land supply within the borough against detailed triggers identified through the DMP.</u></p> <p><u>Policy CS11 - Allocated sites for urban extensions will only be released for development if evidence of land supply indicates insufficient development opportunities within the urban area.</u></p>	<p>(6.6.9):</p> <p>“Sites to the East of Redhill will only be released for development once it is clear that prior to occupation of the development:</p> <ul style="list-style-type: none"> a. improvements to the transport network in Redhill will have been implemented; and b. new school capacity (secondary and primary) will have been delivered. <p>Sites to the East of Merstham will only be released for development once it is clear that prior to occupation of the development;</p> <ul style="list-style-type: none"> a. Improvements to service provision within Merstham Estate Local Centre will have been delivered.” <p>There have been changes made to the implementation section of the CS that clarifies that the DMP will include measures to mitigate and/or avoid the impacts of new development taking account of local level constraints and infrastructure and service requirements.</p> <p>Biodiversity will need to be designed into development, with corridors respected and new habitats created. This will be necessary to mitigate the negative impact of Greenfield development. Areas of significant biodiversity value were considered and rejected as part of the methodology behind selecting broad areas for urban extensions, so designing in biodiversity into the selected areas may sufficiently offset the developments impact on this objective. This has been covered by CS8.</p> <p>The housing scale, location and density section had amendments made to the</p>
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		<p>figures. At this strategic level of appraisal it is not believed that these changes significantly affect the overall appraisal score. This is also the case for the removal of the housing density figures from the CS. The density figures will now appear in the DMP, and at this point the figures will be appraised, and through the SA process recommendations may be given for the most appropriate densities for specified locations. The figures given for retail in this version give more certainty and clarity, but do not significantly alter the strategic direction previously appraised.</p> <p>Changes have also been made to the figures given in CS6 – this reflects the figures from CS4 but is broken down by area. This does not have a significant impact on the appraisal scoring.</p>
Sustainable Construction	<ol style="list-style-type: none"> 1. All new housing will be expected to be built to a minimum standard of Code for Sustainable Homes Level 4. Maximum standards may be mandated for certain code categories in order to overcome site specific issues. 2. All relevant non-residential development resulting in new or replacement buildings, or new extensions to existing structures must be built to BREEAM 'very good' standard (or any future national equivalent) as a minimum. 3. The Council will encourage and promote the development of decentralised energy networks as a means to aid future development to meet zero-carbon targets affordably <ol style="list-style-type: none"> a) Where major development is planned within, or adjacent to, areas of significant heat density, it will be expected that the potential to create, or connect to, a district heating network is fully investigated b) Where a district heat network exists or is planned, or where there is potential to utilise waste heat, the Council may require development in these areas to be designed to facilitate its use and connect to it 	<p>It is considered that the changes made to policy CS9 do not constitute a significant alteration in the sustainability credentials of this policy. It is for this reason that the scoring of this policy remains the same as the submission (2012) version. The submission SA highlighted the following concern "<i>The DMP should give consideration as to whether there needs to be some additional direction as to whether you minimise or maximise particular facets in relation to particular sites. Explanation should be given about how to maximise benefits e.g. increased cycle facilities on a site close to a town centre with a reduction in another facet</i>" – this has been addressed through the latest iteration of this policy.</p>

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4.2 Alternatives appraised

4.2.1 Alternative options have been appraised for each of the Core Strategy policies since the Issues and Options version in 2005, through to the current version. The table below shows the Core Strategy versions and corresponding SA/SEA report.

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
Sustainable Urban Extensions technical report	November 2012
Further Amendments 2012	November 2012

4.2.2 Each of the Appraisal matrices that follow has a section covering the alternative options that have been considered and appraised for each of the changes made. For the alternatives to each of the policies in the Core Strategy, regardless of whether they have been modified at this stage, please see appendix A.

4.3 Cumulative impacts

4.3.1 The cumulative impacts for the post-submission amendments to the Core Strategy (apart from the SUE work) are not thought to be significantly different to those identified in the submission 2012 version. These are:

- Air quality
- Traffic congestion

4.3.2 The cumulative impacts of development on the Mole Gap to Reigate Escarpment Special Area of Conservation (SAC) are covered by a separate report. Please see Habitats Regulations Assessment for the Core Strategy (Further Amendments December 2012).

4.3.3 Cumulative impacts for the SUE work can be seen in the SUE SA report. In summary they affect:

- Traffic congestion
- School places
- Regeneration

5. Monitoring

5.1 Sustainability Appraisal indicates that the proposed Core Strategy has sound sustainability credentials, but there are some areas where adverse impacts might occur and it is recommended that these be monitored. In addition, monitoring can help identify areas where benefits are not being maximised. Progress with respect to

the implementation of the Core Strategy DPD will be monitored through the Annual Monitoring Report for the LDF.

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

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

Presumption in favour of sustainable development

Changes

1. In assessing and determining development proposals, the Council will apply the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will work proactively with applicants to secure development that improves the economic, social and environmental conditions in the area
2. Unless material considerations indicate otherwise, proposed development that accords with policies in the development plan - including this Core Strategy (and where relevant with policies in neighbourhood plans) - will be approved without delay, and proposed development that conflicts with the development plan will be refused.
3. Where there are no policies relevant to the application or where relevant policies are out of date at the time of making the decision the Council will grant permission unless:
- a. The adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against policies in the National Planning Policy Framework as a whole; or
- b. Specific policies in the National Planning Policy Framework indicate that development should be restricted; or
- c. Any other material considerations indicate otherwise.

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.	+	+	+	Policy CS10 – sport and recreation
3. To reduce poverty and social exclusion.	+	+	?	Spatial location of development makes clear intension that regeneration areas have priority for development.
4. To minimise the harm from flooding.	+	+	++	CS8 Sustainable Development, The spatial location of development allows for flood risk areas to be avoided in the future.
5. To improve accessibility to all services facilities, and natural greenspace.	+	+	+	Spatial location of development
6. To make the best use of previously developed land and existing buildings.	+	+	-	Spatial location of development
7. To reduce land contamination and safeguard soil quality and quantity.	+	+	-	Spatial location of development
8. To ensure air quality continues to improve.	+	+	+	CS8
9. To reduce noise pollution.	+	+	+	CS8
10. To reduce light pollution.	+	+	+	CS8
11. To improve the water quality of rivers and groundwater, and maintain an adequate supply of water.	+	+	+	CS8

12. To conserve and enhance biodiversity and networks of natural habitat.	+	+	-?	CS1, CS8
13. To conserve and enhance landscape character and feature, the historic environment and cultural assets and their setting.	+	+	-	CS1, CS2
14. To reduce the need to travel, encourage sustainable transport options and make the best use of existing transport infrastructure.	+	+	+	Spatial location of development
15. To ensure that the District adapts to the impacts of the changing climate.	+	+	++	The spatial location of development allows for flood risk areas to be avoided in the future and to avoid excessive urban intensification.
16. Provide for employment opportunities to meet the needs of the local economy	+	+	+	CS3
17. Support economic growth which is inclusive, innovative and sustainable	+	+	+	CS3
18. To achieve sustainable production and use of resources	+	+	+	CS9
19. To increase energy efficiency and the production of energy from low carbon technologies, renewable sources and decentralised generation systems.	+	+	++	CS10

Summary:

This policy has been appraised from the viewpoint that if development is granted through use of this policy (presumption in favour of sustainable development) would the SA objectives be fulfilled. If proposed development that accords with policies in the development plan is granted then the majority of the SA objectives score positively, There are some negatives, such as land contamination, biodiversity and landscape, where by the nature of development there will be some impact, particularly in the longer term with SUEs, but the matrix indicates which policies in the CS aim to minimise these impacts.

Previous appraisal and alternatives

This policy was first introduced at this stage (further amendments 2012) of plan preparation in accordance with national guidance. There have been no alternatives appraised as this policy is required by the Planning Inspectorate.

Green Belt

Changes

SO4 – addition of sentence ‘role of the Green Belt’ (Clarification)

Para 5.1.13 Green Belt boundaries will only be altered in exceptional circumstances, and through the plan development process: further detail about this process is provided in section 6.2 and Policy CS1b Green Belt. (clarification)

New Green Belt policy CS1b

1. A robust and defensible Green Belt will be maintained to ensure that the coherence of the green fabric is protected and future growth is accommodated in a sustainable manner.

2. Planning permission will not be granted for inappropriate development in the Green Belt unless very special circumstances clearly outweigh the potential harm to the Green Belt.

3. Land may be removed from the Green Belt and allocated for development through the plan-making process, in order to secure the delivery of the objectives and policies of the Core Strategy and to identify options for meeting development needs beyond the plan period. Land will only be removed from the Green Belt where:

a. Exceptional circumstances can be demonstrated; and

b. The development proposed cannot be accommodated on land within the existing urban area or on land which is countryside beyond the Green Belt; or

c. The development of land within the Green Belt would represent a significantly more sustainable option.

4. The Council will undertake a Green Belt review to inform the Development Management Policies document and Proposals Map. This review will assess the contribution made by land to the purposes of the Green Belt and will also seek to:

a. address existing boundary anomalies

b review washed over and areas of land inset within the Green Belt

c. ensure clearly defined and readily recognisable boundaries which are likely to be permanent and endure beyond the plan period.

5. In accordance with (3) and (4) above, land required for development will be removed from the Green Belt and allocated or safeguarded through the Development Management Policies DPD. The release of land allocated for development will be determined through annual monitoring against identified trigger points. Safeguarded land will only be allocated through a subsequent Local Plan review and will be subject to Green Belt policy until that 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.		+	++	Point 3 and 5 address potential conflict between protection of the Green Belt and housing supply.
2. To facilitate the improved health and wellbeing of the whole population.		?	?	Green Belt as a policy designation does not indicate whether land is accessible for recreation/health & wellbeing. There is potential that in releasing some GB, UOL and urban greenspace may be protected, however this is an assumption and an unknown at this point in time.
3. To reduce poverty and social exclusion.		N/A		
4. To minimise the harm from flooding.		+	+	Point 3C creates flexibility to avoid land susceptible to flooding

5. To improve accessibility to all services facilities, and natural greenspace.		+	?	In protecting the GB in the first instance, development will be directed to the urban area. Protection of the GB, except when land is allocated through the plan-making process, ensures that accessibility is taken into account in any development scenario.
6. To make the best use of previously developed land and existing buildings.		++	-	Protection of the GB ensures development takes place on PDL or in the urban area. In the longer term as urban land supply runs out, GB allocations will be released, which in some cases may not have any PDL. Mitigation - The impact can be minimised through careful selection of location.
7. To reduce land contamination and safeguard soil quality and quantity.		+	-	Protection of GB may protect areas outside of the urban area from contamination in the short-medium term. Long term development may have to be on safeguarded land in the GB which is likely to be greenfield. Mitigation - The impact can be minimised through careful selection of location.
8. To ensure air quality continues to improve.		?		Dependent on location
9. To reduce noise pollution.		?		Dependent on location
10. To reduce light pollution.		?		Dependent on location
11. To improve the water quality of rivers and groundwater, and maintain an adequate supply of water.		?		Proximity to rivers may be an issue here, although is no more an issue for sites in the GB than in the urban area. Close liaison should be carried out with water companies to ensure supply of water is considered at the earliest stage.
12. To conserve and enhance biodiversity and networks of natural habitat.	++	+	-	In the short to medium term protection of the GB will help to protect biodiversity sites and networks by focussing development in the urban area. In the longer term if GB sites are released for development impacts may be felt. Mitigation – Biodiversity networks should be taken into account when allocating land in the GB. Biodiversity should be designed into development.
13. To conserve and enhance landscape character and feature, the historic environment and cultural assets and their setting.	++	+	?-	Protection of the GB will ensure historic settings of towns and settlements are protected and landscape character is preserved. In the longer term this has the potential to be impacted, and is dependent on location as to the extent of this. Mitigation - The impact can be minimised through careful selection of location, and green infrastructure within the new development.

14. To reduce the need to travel, encourage sustainable transport options and make the best use of existing transport infrastructure.	++	++	?	Protection of the GB will ensure development is located in areas well served by public transport and close to facilities/ schools. In the longer term the scoring for this objective becomes dependent on location of GB release. Mitigation – take this objective into account when selecting sites for release.
15. To ensure that the District adapts to the impacts of the changing climate.		+	++	Although building on greenfield itself could conflict with adaptation to climate change, point 3C gives the flexibility to avoid a reduction in urban green areas, and building in flood risk areas.
16. Provide for employment opportunities to meet the needs of the local economy		N/A		The policy designation of GB does not provide for employment opportunities.
17. Support economic growth which is inclusive, innovative and sustainable		0		There would be potential for conflict between GB policy and economic growth should the policy restrict the development of houses and employment. Point 3a (exceptional circumstances) allows for this conflict to be resolved.
18. To achieve sustainable production and use of resources		N/A		Not applicable.
19. To increase energy efficiency and the production of energy from low carbon technologies, renewable sources and decentralised generation systems.		0		Decentralised Energy Networks are dependent on heat loads and therefore scale of development. This could be incorporated into development in the urban area or UE.

Summary:

The policy provides clarity on the Council’s commitment to protect the GB and the spatial strategy to build in the urban area first. The policy is flexible enough to allow urban extensions to progress (see strategic locations for growth matrix). This policy scores well in terms of housing provision (to address need) and climate change (to avoid increased urban intensification, and building on flood risk areas) because of the flexibility in releasing some GB land in the longer term (exceptional circumstances). Much of the appraisal scoring was dependent on locations, as GB designation covers a large proportion of the borough (70%). This is picked up in the appraisal of Strategic Urban Extensions and is a separate document.

Previous appraisals and alternative options

- Issues and options 2005 – Protect the GB (selected) / do not protect the GB (rejected)
- Preferred Option 2006 – Policy BNE1 Continue to protect and enhance....Metropolitan GB (selected)
- Preferred Options 2008 – Preferred Policy Approach 4 – Protect and enhance the GB (selected)
- Submission 2009 – CS1: review of MGB (selected), CS4: Sustainable Urban Extensions (SUE) (selected)
- Schedule A&B changes: CS4: reference to SUE removed (rejected)
- Outstanding Issues 2011: Broad Locations for growth: Urban intensification / SUE (possibly in the Green Belt)(selected)

Throughout the production of the Core Strategy the issue of Green Belt development has been appraised many times. At the early stages of the plan preparation consultation responses favoured protecting the GB and so this was translated into the plan at that time. In 2009 two options were appraised, CS4 with SUE and without SUE. The appraisal highlighted some issues related to urban intensification, but the SHLAA figures at the time suggested the SUE be dropped from policy CS4. The outstanding issues consultation (2011) reinstated the SUE in CS4 as revised housing and SHLAA figures indicated it was probable that GB release was required in the longer term. Broad locations for development were appraised at this point, including GB development (alternatives: UOL, residential intensification, flats above shops, employment land, and do nothing beyond SHLAA sites). For full details of these appraisals, please see relevant SA report.

Historic Environment

Changes

Para 3.12 The borough’s townscapes and landscapes also therefore include a diverse range of heritage assets.

SO6 – addition of ‘historic’ and ‘heritage assets’

5.2.7 – addition of ‘Heritage assets’

Policy CS2 – renamed to include ‘historic environment’

1.e. Development will be designed sensitively to respect, reflect local heritage and to protect, conserve, and enhance the historic environment, including heritage assets and their settings. Development proposals that would provide sensitive restoration and re-use for heritage assets as risk will be particularly encouraged.

Policy CS8 – reference to historic environment

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.		?		There is potential conflict between the costs of affordable housing and costs for restoration (of a building / part of the site) affecting viability. This is site specific and would need to be picked up through the DMP.
2. To facilitate the improved health and wellbeing of the whole population.		0		
3. To reduce poverty and social exclusion.		0		
4. To minimise the harm from flooding.		0		
5. To improve accessibility to all services, facilities, and natural greenspace.		0		
6. To make the best use of previously developed land and existing buildings.		++	++	The re-use of heritage assets and restoration will make good use of existing buildings.
7. To reduce land contamination and safeguard soil quality and quantity.		0		
8. To ensure air quality continues to improve.		0		
9. To reduce noise pollution.		0		
10. To reduce light pollution.		0		
11. To improve the water quality of rivers and groundwater, and maintain an adequate supply of water.		0		
12. To conserve and enhance biodiversity and networks of natural habitat.		0		
13. To conserve and enhance landscape character and feature, the historic environment and cultural assets and their setting.		++	++	The addition to policy CS2 provides stronger direction for developers to consider the historic environment and assets.
14. To reduce the need to travel, encourage sustainable transport options and make the best use of existing transport infrastructure.		0		
15. To ensure that the District adapts to the impacts of the changing climate.		0		
16. Provide for employment opportunities to meet the needs of the local economy		0		
17. Support economic growth which is inclusive, innovative and sustainable		0		
18. To achieve sustainable production and use of resources		0		Re-use of buildings balanced with specificity of materials required for renovation.

19. To increase energy efficiency and the production of energy from low carbon technologies, renewable sources and decentralised generation systems.		-	-	There are conflicts recognised between the preservation of historic buildings / settings and the provision of some types of renewable energy infrastructure.
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Summary:

The strengthening of the wording of policy CS2 provides, as would be expected, positive scoring in relation to SA objective 13. Conflicts have been identified in previous appraisals in relation to renewable energy and the historic environment generally, this appraisal specifically identifies the costs associated with provision of affordable housing and costs for restoration and how this may affect viability. These conflicts can be adequately addressed through the DMP with design guidance and issues of viability should be addressed on a site by site basis.

Previous appraisal and alternatives

Issues & options 2005 – Continue to protect...historic areas (selected), Do not continue to protect...historic areas (rejected)

Preferred options 2006 – UD3: Protect conserve and enhance historic features and areas of historic importance and special character (selected)

Preferred options 2008 – Option 7: Development, Protection of Character and Heritage and Urban Design (selected)

Submission 2009 – CS2: SA highlighted that CS should be setting the agenda with regards to historic environment. (selected, reference to historic environment strengthened)

The SA highlighted that policy CS2 should be strengthened with regards to historic environment.

Conflicts with SA objectives and this policy have been raised throughout the process such as viability, and strict adherence to traditional design may conflict with inclusive accessibility, lifetime homes and climate change. These conflicts can be sufficiently addressed through the DMP and design guidance.

Strategic locations for growth

Changes

Box 4:

	Area 1: The North Downs	Area 2: Wealden Greensand Ridge	Area 3: The Low Weald	Borough total
Characteristic	Small settlements within the Green Belt	Main borough centres – Redhill & Reigate – conglomeration within Green Belt	Horley; other small settlements within Green Belt. Adjacent to Gatwick airport	
Housing scale, location and density	<u>At least 930 homes to be delivered within the urban area</u>	<u>At least 1,610 homes to be delivered within the urban area</u>	<u>At least 2,440 homes to be delivered within the urban area, including through the Horley sectors</u>	<u>At least 6,900</u>
	<u>At least 815 homes to be delivered through windfalls and other urban broad locations</u>			
Housing to 2022# Housing post 2022#		<u>Up to 1,000-1,400 homes through urban extensions</u>	<u>Up to 200 homes through small scale urban extensions</u>	<u>At least 4,719</u> <u>4,975</u>
	<u>Development densities will reflect the overall character and context of the area, including levels of accessibility and surrounding densities.</u>			
Total housing				<u>At least 6,900</u> <u>7,390</u>
Housing location and density*	Peripheral d Development in and around Banstead Village centre, limited scale, indicative density of 30-80dph. Urban areas with moderate to low accessibility, small/medium scale, indicative density of 30-50dph. Urban areas with low accessibility, small scale, indicative density of 30-50dph.	Redhill town centre, large scale, indicative density of at least 150dph, rising to 300dph around Redhill station. Peripheral d Development in and around Reigate town centre, limited scale, indicative density of last at least 50dph. Inner urban area around Redhill, small/medium/large scale, indicative density of at least 50dph. Urban areas with moderate to low accessibility, small/medium scale, indicative density of 30-50dph. Potential sustainable urban extension(s), medium/large scale, indicative density 30-50dph.	Horley town centre, medium/large scale, indicative density at least 50dph. Urban areas with moderate to low accessibility, small/medium scale, indicative density of 30-50dph. NE sector new neighbourhood, 710 units. NW sector new neighbourhood, 1,570 units. Potential sustainable urban extension(s), medium/large scale, indicative density 30-50dph.	
Employment* subject to regular monitoring of demand levels	<u>At least 2,000sqm</u>	<u>At least 20,000sqm, including up to 7,000sqm in Redhill town centre</u>	<u>At least 24,000sqm</u>	<u>At least 38,500sqm</u>
	<u>Re-use and intensification of existing employment land, maximising opportunities within town centres and the most accessible locations</u>			
Employment	No major new development planned. Re-use and intensification of existing employment land. Up to 2,000sqm.	Re-use and intensification of existing employment land. Up to 7,000sqm additional office floorspace in Redhill town centre. Up to 12,500sqm additional commercial floorspace in identified employment areas.	Re-use and intensification of identified employment land, in particular for smaller units in Horley. Up to 24,000sqm additional commercial floorspace in identified employment areas.	Up to 38,500sqm additional commercial floorspace. And Up to 7,000sqm additional office floorspace in Redhill.
Retail* subject to regular monitoring of demand levels	<u>Banstead Village centre: At least 1,300sqm of comparison floorspace and 1,200sqm of convenience floorspace</u>	<u>Redhill and Reigate town centres: At least 19,350sqm of comparison floorspace and 7020 of convenience floorspace</u>	<u>Horley town centre: At least 3,870 of comparison floorspace and 2,340 of convenience floorspace</u>	<u>At least 25,800sqm comparison floorspace and at least 11,700sqm convenience floorspace</u>
Retail	Banstead Village town centre: small scale improvements and limited additional retail development. Local shopping centres: improvement and consolidation.	Redhill: expansion of primary shopping centre to accommodate at least 15,480sqm comparison floorspace and at least 7,020sqm convenience floorspace. Reigate: small scale improvements and limited additional retail development. Local shopping centres: improvement and consolidation.	Horley: town centre improvements and limited additional retail development. Local shopping centres: two additional centres and improvement and consolidation of existing.	At least 25,800sqm additional comparison floorspace. And At least 11,700sqm additional convenience floorspace.

Policy CS1a and (except any areas allocated for development through the DMP) (protection of green fabric) (Clarification of approach to urban extensions)

Para 6.2.5 - If unanticipated, but more sustainable, opportunities come forward in the urban area this may mean that the need for greenfield development is pushed back or that the scale is less than currently estimated; conversely, if identified opportunities fail to come forward, greenfield development may be required earlier in the plan period. Regular monitoring against identified 'trigger points' will ensure that greenfield sites are only released for development as a last resort, when other opportunities have been exhausted.

Policy CS4

2.4. The release of land adjoining the urban area will be needed to meet the housing requirements set out in Policy CS11, unless unanticipated opportunities arise within the urban area that align with (1) above. Broad geographic locations have been identified for urban extensions, in order of priority:

- i. Non-Green Belt land adjoining the urban area of Horley: small scale extensions
- ii. East of Redhill and East of Merstham
- iii. South and West of Reigate (Woodhatch)

3. Sites (including for urban extensions) will be allocated in the Development Management Policies DPD, taking account of:

- environmental and amenity value
- localised constraints and opportunities,
- the need to secure appropriate infrastructure/service provision; and
- other relevant criteria as set out in Policy CS8.

4. The release of allocated sites adjoining the urban area will be determined through regular monitoring of identified land supply within the borough against detailed triggers identified through the DMP.

Policy CS11 - a. At least 5,800 homes within the existing urban area, a. 2012-2022: within the existing urban area, in particular the priority regeneration areas and the Horley North East and North West sectors.

b. The remainder to be provided in sustainable urban extensions in the locations set out in policy CS4.

3. ...Allocated sites for urban extensions will only be released for development if evidence of land supply indicates insufficient development opportunities within the urban area.

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 is positive in delivering housing; however cross-ref to housing needs evidence and affordable housing policy indicates that full level of demand from in-migration may not be addressed, this prevents a double +.

2. To facilitate the improved health and wellbeing of the whole population.	+	+	+	Urban extensions as an alternative to intensifying the urban area scores better for health and wellbeing through preventing the loss of urban open land and urban green spaces which are vital to utilitarian exercise and access to open space which is important for mental as well as physical wellbeing. Concept of developing UOL as an alternative to Green Belt has been appraised at Outstanding Issues (Sep 2011) see matrices in Appendix 1 of OI SA report. This was a consideration in the selection of which BAS should be designated as SUE. See SA report for Sustainable Urban Extensions to see how each area scored, and to see alternatives appraised.
3. To reduce poverty and social exclusion.	0	0	0	Regeneration priorities must be delivered before any release of GB.
4. To minimise the harm from flooding.	0	0	0	On balance this objective scores neutrally taking into account the Green Belt release reducing the need for urban intensification which can exacerbate flood risk (Redhill and Horley). Small scale extensions are being directed first to non-GB land around Horley which has the potential to have some impact on flood risk. This issue has been explored through the appraisal of O and P (BAS) see Sustainable Urban Extension SA report. The allocation of sites surrounding Horley should address the need to avoid areas of flood risk.
5. To improve accessibility to all services facilities, and natural greenspace.		See SUE SA report		This is specific to each of the 3 broad geographic locations. This was a consideration in the selection of which BAS should be designated as SUE. See SA report for Sustainable Urban Extensions to see how each area scored, and to see alternatives appraised.
6. To make the best use of previously developed land and existing buildings.		See SUE SA report		This is specific to each of the 3 broad geographic locations. This was a consideration in the selection of which BAS should be designated as SUE. See SA report for Sustainable Urban Extensions to see how each area scored, and to see alternatives appraised.
7. To reduce land contamination and safeguard soil quality and quantity.		See SUE SA report		This is specific to each of the 3 broad geographic locations. This was a consideration in the selection of which BAS should be designated as SUE. See SA report for Sustainable Urban Extensions to see how each area scored, and to see alternatives appraised.

8. To ensure air quality continues to improve.		See SUE SA report		This is specific to each of the 3 broad geographic locations. This was a consideration in the selection of which BAS should be designated as SUE. See SA report for Sustainable Urban Extensions to see how each area scored, and to see alternatives appraised.
9. To reduce noise pollution.		See SUE SA report		This is specific to each of the 3 broad geographic locations. This was a consideration in the selection of which BAS should be designated as SUE. See SA report for Sustainable Urban Extensions to see how each area scored, and to see alternatives appraised.
10. To reduce light pollution.		See SUE SA report		This is specific to each of the 3 broad geographic locations. This was a consideration in the selection of which BAS should be designated as SUE (as part of the SA). See SA report for Sustainable Urban Extensions to see how each area scored, and to see alternatives appraised.
11. To improve the water quality of rivers and groundwater, and maintain an adequate supply of water.		See SUE SA report		This is specific to each of the 3 broad geographic locations. This was a consideration in the selection of which BAS should be designated as SUE. See SA report for Sustainable Urban Extensions to see how each area scored, and to see alternatives appraised.
12. To conserve and enhance biodiversity and networks of natural habitat.	-	-	-	There will be disruption to biodiversity through development in greenfield land, however this can be minimised. Each of the 3 broad geographic locations will require mitigation through design of biodiversity habitats into development, and prevention of disruption to wildlife corridors. This was a consideration in the selection process for SUEs. See SA report for Sustainable Urban Extensions to see how each area scored, and to see alternatives appraised.
13. To conserve and enhance landscape character and feature, the historic environment and cultural assets and their setting.	0	0	0	On balance this scores neutral taking into account the potential impact on landscape as opposed to the minimised impact on historic environment within the urban area that will experience less development pressure. This objective was a consideration in the selection process for SUEs. See SA report for Sustainable Urban Extensions to see how each area scored, and to see alternatives appraised.

14. To reduce the need to travel, encourage sustainable transport options and make the best use of existing transport infrastructure.	+	+	+	This objective was a consideration in the selection process for SUEs. See SA report for Sustainable Urban Extensions to see how each area scored, and to see alternatives appraised. This is specific to each of the 3 broad geographic locations, with Redhill and Horley scoring particularly well in access to transport infrastructure. The appraisal of BAS J (East of Redhill) highlighted the need for transport improvements to be carried out prior to development.
15. To ensure that the District adapts to the impacts of the changing climate.	+	+	++	Releasing Green Belt land scores positively in relation to adapting to the impacts of climate change. This is due to increasing heat and rainfall at certain times of the year combined with urban intensification and the resulting loss of greenspace and open land, and flood risk in the urban area.
16. Provide for employment opportunities to meet the needs of the local economy		N/A		
17. Support economic growth which is inclusive, innovative and sustainable	+	+	+	Provision of workforce.
18. To achieve sustainable production and use of resources	0	0	0	Allotments and community gardens need to be considered in urban extensions. See SA report for Sustainable Urban Extensions.
19. To increase energy efficiency and the production of energy from low carbon technologies, renewable sources and decentralised generation systems.	0	0/+	+	Urban extensions may provide the opportunity for Decentralised Energy Network.

Summary: The significant changes to this policy have been appraised through the Strategic Urban Extensions work and can be seen in the corresponding SA report. The SUE SA report helped to suggest the broad areas that would be most suitable for strategic scale urban extensions. 2 of the suggested broad areas were East of Redhill and South and West of Reigate (Woodhatch) – these areas have been selected and taken forward as urban extensions. The rural surrounds of Horley have been taken forward because they are not Green Belt, and this land should be considered before Green Belt. The areas were not recommended by the SA as having potential to accommodate strategic urban extensions, but due to good accessibility small scale development opportunities were not ruled out. The appraisal of each of the broad areas highlighted mitigation that should be considered such as transport improvements and new school capacity. This has been addressed within the CS in the following paragraph (6.6.9):

“Sites to the East of Redhill will only be released for development once it is clear that prior to occupation of the development:

- a. improvements to the transport network in Redhill will have been implemented; and
- b. new school capacity (secondary and primary) will have been delivered.

Sites to the East of Merstham will only be released for development once it is clear that prior to occupation of the development;

- b. Improvements to service provision within Merstham Estate Local Centre will have been delivered.”

There have been changes made to the implementation section of the CS that clarifies that the DMP will include measures to mitigate and/or avoid the impacts of new development taking account of local level constraints and infrastructure and service requirements.

Biodiversity will need to be designed into development, with corridors respected and new habitats created. This will be necessary to mitigate the negative impact of Greenfield development. Areas of significant biodiversity value were considered and rejected as part of the methodology behind selecting broad areas for urban extensions, so designing in biodiversity into the selected areas may sufficiently offset the developments impact on this objective. This has been covered by CS8.

The housing scale, location and density section had amendments made to the figures. At this strategic level of appraisal it is not believed that these changes significantly affect the overall appraisal score. This is also the case for the removal of the housing density figures from the CS. The density figures will now appear in the DMP, and at this point the figures will be appraised, and through the SA process recommendations may be given for the most appropriate densities for specified locations. The figures given for retail in this version give more certainty and clarity, but do not significantly alter the strategic direction previously appraised.

Changes have also been made to the figures given in CS6 – this reflects the figures from CS4 but is broken down by area. This does not have a significant impact on the appraisal scoring.

Previous appraisal and alternative options

The overall spatial strategy behind this policy has been appraised from Issues and Options 2005 until the current CS – please see Appendix E of the Strategic Urban Extensions report for alternative strategies and why they were rejected.

Alternatives to the proposed urban extensions have been appraised, these include: broad locations for development (Outstanding Issues Sep 2011) Development on Urban Open Land, urban intensification (residential), flats above shops, and rural surrounds of Horley.

Alternative geographical scales and types of extension were considered: 1 large extension, 2 or 3 medium sized extensions, several small extensions, one large stand alone settlement. Also development on employment land was appraised at this point. Employment land was rejected due to the impact on economic objectives, the appraisal of scales did not reject any of the options as it considered location was important in the scoring of each alternative and that was unknown at that stage.

All of these alternative options can be seen in the submission 2012 SA report and Appendix E Urban Extensions SA report.

When individual broad areas of search were appraised, 20 different areas were considered and appraised. Some were rejected, some selected for strategic urban extensions, and others were rejected for strategic urban extensions but acknowledged as having potential for small scale development. Full appraisal of these options can be seen in Strategic Urban Extensions SA report.

Sustainable construction (CS9)

Changes

1. All new housing will be expected to be built to a minimum standard of Code for Sustainable Homes Level 4 standards (or any future national requirement), unless it can be demonstrated, on a case by case basis, that this is not financially viable or technically feasible. As a minimum, new housing must be constructed to meet the energy, CO2 and water components of the Code for Sustainable Homes Level 4, or higher as dictated by future legislation and guidance. Maximum standards may be mandated for certain code categories in order to overcome site specific issues.
 2. All relevant non-residential development resulting in new or replacement buildings, or new extensions to existing structures must be built to BREEAM 'very good' standard (or any future national equivalent) as a minimum.
 3. The Council will encourage and promote the development of decentralised energy networks as a means to aid future development to meet zero-carbon targets affordably.
 - a. Where a major development is planned within, or adjacent to, areas of significant heat density, it will be expected that the potential to create, or connect to, a district heating network is fully investigated.
 - b. Where a district heat network exists or is planned, or where there is potential to utilise waste heat, the Council may require development in these areas to be designed to facilitate its use and connect to it.
- ~~a. Strategic development proposals as identified through subsequent DPDs must, where feasible and viable, incorporate decentralised energy networks.~~
- ~~b. Proposals for major development must investigate the potential for – and where feasible and viable incorporate – connection, or the facility to connect in the future, to decentralised energy networks.~~

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.				For scoring see appraisal from Submission SA report (May 2012)
2. To facilitate the improved health and wellbeing of the whole population.				
3. To reduce poverty and social exclusion.				
4. To minimise the harm from flooding.				
5. To improve accessibility to all services facilities, and natural greenspace.				
6. To make the best use of previously developed land and existing buildings.				
7. To reduce land contamination and safeguard soil quality and quantity.				
8. To ensure air quality continues to improve.				
9. To reduce noise pollution.				
10. To reduce light pollution.				

11. To improve the water quality of rivers and groundwater, and maintain an adequate supply of water.				
12. To conserve and enhance biodiversity and networks of natural habitat.				
13. To conserve and enhance landscape character and feature, the historic environment and cultural assets and their setting.				
14. To reduce the need to travel, encourage sustainable transport options and make the best use of existing transport infrastructure.				
15. To ensure that the District adapts to the impacts of the changing climate.				
16. Provide for employment opportunities to meet the needs of the local economy				
17. Support economic growth which is inclusive, innovative and sustainable				
18. To achieve sustainable production and use of resources				
19. To increase energy efficiency and the production of energy from low carbon technologies, renewable sources and decentralised generation systems.				

Summary:

It is considered that the changes made to policy CS9 do not constitute a significant alteration in the sustainability credentials of this policy. It is for this reason that the scoring of this policy remains the same as the submission (2012) version. The submission SA highlighted the following concern “*The DMP should give consideration as to whether there needs to be some additional direction as to whether you minimise or maximise particular facets in relation to particular sites. Explanation should be given about how to maximise benefits e.g. increased cycle facilities on a site close to a town centre with a reduction in another facet*” – this has been addressed through the latest iteration of this policy.

Previous appraisal and alternatives appraised.

Issues & options (2005) – requirement to provide percentage of renewables on site (selected), do not require percentage of renewables to be provided on site (rejected)

Preferred Options (2008) Preferred Policy Approach 6: Sustainable Construction – 2013-16 CSH 5 or BREEAM excellent. 10% renewable on-site, carbon neutral or financial contribution (rejected required updating)

Submission (2009) Updated to reflect buildings regulations requirements (rejected due to comments from the Inspector at the Examination in 2009 – the policy was not justified and lacked clarity)

Submission (2012) This policy was significantly revised from previous version. New housing = or > building regs, Non-residential (inc extensions) BREEAM very good, Decentralised Energy Networks (incorporate/ investigate potential for). This was selected with changes made for clarity.

UOL review criteria

Changes

Land designated as urban open land in ~~accordance with~~ the Reigate & Banstead Borough Local Plan 2005 will be reviewed ~~through to inform~~ the development of ~~the GI Strategy and the DMP and~~ Proposals Map, and the development of the GI Strategy, to ensure that open spaces continue to be given an appropriate level of protection in recognition of their public value for visual amenity, sports and recreation. Where appropriate, local green spaces may also be designated. The review should give consideration to the extent to which sites:

- contribute to landscape and townscape character

- provide accessible open space, sport and recreation facilities

- address deficiencies in open space provision

- provide wider benefits including, but not limited to, biodiversity conservation and flood management.

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.	-	-	--	There is conflict between the protection of UOL and land for housing – this may become more of an issue in the longer term as other sources of land supply are developed.
2. To facilitate the improved health and wellbeing of the whole population.	++	++	++	Physical and mental wellbeing can be gained through access to open / green space.
3. To reduce poverty and social exclusion.		N/A		
4. To minimise the harm from flooding.	++	++	++	UOL and green space can make a positive contribution to minimising the harm from flooding.
5. To improve accessibility to all services facilities, and natural greenspace.	++	++	++	
6. To make the best use of previously developed land and existing buildings.	-	-	--	Protection of UOL may bring forward the requirement to build in the GB, particularly in the longer term as other sources of land supply are developed..
7. To reduce land contamination and safeguard soil quality and quantity.		N/A		
8. To ensure air quality continues to improve.		N/A		
9. To reduce noise pollution.		N/A		
10. To reduce light pollution.		N/A		
11. To improve the water quality of rivers and groundwater, and maintain an adequate supply of water.	+	+	+	Green space helps to reduce the level of pollutants in rainwater run-off into rivers and groundwater.
12. To conserve and enhance biodiversity and networks of natural habitat.	++	++	++	Although this does score positively for enabling habitat networks through urban areas, there is some conflict between safeguarding UOL, which may bring forward the requirement to built in the GB

13. To conserve and enhance landscape character and feature, the historic environment and cultural assets and their setting.	+	+	+	The criteria states that landscape and biodiversity considerations must be made in reviewing UOL which is positive, however the same conflicts between land uses as mentioned above are relevant.
14. To reduce the need to travel, encourage sustainable transport options and make the best use of existing transport infrastructure.		N/A		
15. To ensure that the District adapts to the impacts of the changing climate.	+	++	++	UOL can be a mechanism of adaptation to climate change for urban populations, against the effects of heat and flood. The impacts of climate change will increase over time, and therefore the protection of UOL into the future will become increasingly important.
16. Provide for employment opportunities to meet the needs of the local economy		N/A		
17. Support economic growth which is inclusive, innovative and sustainable		N/A		
18. To achieve sustainable production and use of resources	+	+	+	UOL may help to achieve sustainable production of resources through community gardens for example.
19. To increase energy efficiency and the production of energy from low carbon technologies, renewable sources and decentralised generation systems.		N/A		

Summary:

There are conflicts between different types of land use highlighted in this appraisal; however the benefits to the existing population of safeguarding UOL far outweigh these, such as health and wellbeing benefits, and climate change impacts.

Previous appraisal and alternatives

Issues & options 2005 – provision of community facilities and services on UOL (rejected) / do not provide facilities on UOL (selected). The appraisal highlighted the importance of UOL to the community in terms of health and wellbeing, climate change, flooding and biodiversity.

Outstanding Issues (Broad locations for development) 2011 – Build housing on UOL (rejected).

Alternatives: Do nothing (rejected), employment land (rejected), residential intensification (rejected), SUEs (selected)

Gypsies, travellers and travelling showpeople

Changes

Para 7.7.1 The latest evidence of need is the East Surrey Gypsy and Traveller Accommodation Assessment (2007). This identifies a need for 57 Gypsy and Traveller pitches and nine plots for Travelling Showpeople across the East Surrey districts and boroughs. The draft Partial Review of the Regional Spatial Strategy for the South East: Provision for Gypsies, Travellers and Travelling Showpeople identified a need for nine pitches for Gypsies and Travellers and four plots for Travelling Showpeople to 2016. The Council is committed to updating the evidence base in relation to Traveller accommodation needs. Updated information about the level of need, and site allocations, will be included in the Development Management Policies DPD. This may change the level of provision needed in the borough. Information of the level of need as set out above is, however, the best available evidence at this time. Locally arising need will be met by allocating sufficient sites through the DMP document. (Clarification)

Policy CS14 The DMP will identify a local target for Gypsy, Traveller and Travelling Showpeople sites and make provision will be made for a five year supply of specific deliverable sites for Gypsies, Travellers and Travelling Showpeople to meet identified locally arising needs and broad locations for growth for years six to ten.

The site can be integrated into the local area and co-exist with the local community.

d. The site is not located in an area of high risk of flooding, including functional floodplains.

e. There is adequate local infrastructure and access to appropriate healthcare and local schools

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.		++	?	Careful monitoring of need should be carried out to assess whether local need is being met through pitch provision.
2. To facilitate the improved health and wellbeing of the whole population.		++		Integration and co-existence considered. Access to healthcare and schools.
3. To reduce poverty and social exclusion.		+		
4. To minimise the harm from flooding.		++		Flood risk considered.
5. To improve accessibility to all services facilities, and natural greenspace.		+		Access to healthcare and schools.
6. To make the best use of previously developed land and existing buildings.		N/A		
7. To reduce land contamination and safeguard soil quality and quantity.		N/A		
8. To ensure air quality continues to improve.		N/A		
9. To reduce noise pollution.		N/A		
10. To reduce light pollution.		N/A		
11. To improve the water quality of rivers and groundwater, and maintain an adequate supply of water.		N/A		

12. To conserve and enhance biodiversity and networks of natural habitat.		N/A		
13. To conserve and enhance landscape character and feature, the historic environment and cultural assets and their setting.		N/A		
14. To reduce the need to travel, encourage sustainable transport options and make the best use of existing transport infrastructure.		N/A		
15. To ensure that the District adapts to the impacts of the changing climate.		+		Flood risk
16. Provide for employment opportunities to meet the needs of the local economy		N/A		
17. Support economic growth which is inclusive, innovative and sustainable		N/A		
18. To achieve sustainable production and use of resources		N/A		
19. To increase energy efficiency and the production of energy from low carbon technologies, renewable sources and decentralised generation systems.		N/A		

Summary:

A five year supply of sites will help to ensure authorised pitches and plots are available allowing access to healthcare and schools. Flood risk scores positively in terms of impact on the safety of the sites, but also the potential for increased surface run-off for neighbouring areas.

Monitoring - There is potential for private sites to be sold to people from outside of the area, meaning although targets are met, the local population are still overcrowded or without an authorised site. Local need must be addressed as a priority, and consideration should be given to mechanisms for managing this through the DMP.

Previous appraisal and alternatives

Preferred Option 2008 – Preferred Policy Approach 14. The appraisal concluded that should sites be provided in urban areas then better accessibility and integration could be achieved. (Alternatives: East Surrey considered two options for the distribution of pitches)

Schedule A&B – Policy re-written to reflect national policy, local need and to address ineffectiveness (alternatives: previous version PO 2008 - rejected). Re-written policy scored well for consideration of space for business needs and for considering urban areas first for the sites, thereby giving good access to facilities and services, reducing social exclusion and the need to travel (selected).



Sustainability Appraisal Report

ADDENDUM TO SUBMISSION 2012 SA REPORT

Appendix A

**Table showing alternatives and reasons for
selection / rejection**

CS1 Valued landscapes and the natural environment			
Alternatives considered	Stage of preparation	Reasons for de/selecting	SA/SEA conflicts
C1a. Continue to protect ecological, historical and aesthetically important areas (e.g. Green Belt Areas of Outstanding Natural Beauty), sites and structures.	I&O 2005	Selected. Supported through public consultation. Ecological protection required by EU Directive.	Could restrict commercial development, pressure to release employment land for housing, and restrict rural diversification schemes. Protection of AONB may restrict renewable energy development.
C1b. Do not continue to protect ecological, historical and aesthetically important areas (e.g. Green Belt Areas of Outstanding Natural Beauty), sites and structures.	I&O 2005	Rejected as contrary to national and international policy. This option was not supported through consultation.	Development in the Green Belt could increase car miles.
BNE1. Continue to protect and enhance the Borough's: <ul style="list-style-type: none"> • Nationally protected areas including Areas of Outstanding Natural Beauty (AONB), Sites of Special Scientific Interest and Special Area of Conservation; • Metropolitan Green Belt; • Sites of Nature Conservation Importance (SNCIs) and Local Nature Reserves; • Water Courses, and flood plains, which may contain important habitats. • Biodiversity of wildlife species and habitats, including locally significant features such as ponds and veteran trees, - Ancient Woodland, Protected Trees; • Urban Open Land; and • Wildlife corridors and valuable site-specific features such as hedgerows and riverside habitats. 	PO 2006	Selected. Supported through public consultation. Ecological protection required by EU Directive.	No conflicts identified at this stage.
Preferred Policy Approach 4 Protecting and Enhancing our Valued Landscapes	PO 2008	Carried forward with minor changes	

and Natural Environment			
Preferred Policy Approach 5 Green Infrastructure	PO 2008	This was carried forward in concept through CS10 and CS1.	Positive scoring across environmental and social SA objectives.
The Council will conduct a comprehensive review of the Metropolitan Green Belt by 2012; such review taking into account the needs and demands for growth,	Submission 2009	Wording removed from policy CS1 but sustainable urban extensions (possibly in the Green Belt) are now indicated in policy CS4.	
Changed to include AONB review and strengthened reference to Green Infrastructure Strategy – network of green space	Schedule A&B	Without AONB review (rejected), with AONB review (selected). Strengthening of GIS reference (selected)	Scored positively in relation to social objectives for access to green space.
Removal of 800m buffer surrounding SAC	Submission 2012	With buffer – Submission 2009 version (rejected) without buffer (selected) at request of NE. Buffer was difficult to implement and justify.	None
New Green Belt policy	Further amendments 2012	New Green Belt policy (selected) or as part of CS1 (rejected)	None

CS2 Valued Townscapes			
Alternatives considered	Stage of preparation	Reasons for carrying forward / rejecting	SA/SEA conflicts
C1a. Continue to protect ecological, historical and aesthetically important areas (e.g. Green Belt Areas of Outstanding Natural Beauty), sites and structures.	I&O 2005	Selected. Supported through public consultation. Ecological protection required by EU Directive.	Protection of Green Belt may conflict with supply of affordable housing.
C1b. <i>Do not</i> continue to protect ecological, historical and aesthetically important areas (e.g. Green Belt Areas of Outstanding Natural Beauty), sites and structures.	I&O 2005	Rejected as contrary to national and international policy. This was not supported through consultation.	Negative scoring related to biodiversity and historic environments /cultural assets.
Require high quality design of landmark buildings and public spaces, allowing easy, safe and secure movement between places and facilities, with the needs of older	I&O 2005	Carried forward. Required by national planning policy. Supported through public consultation.	Potential conflict identified between renewable energy technologies and protective design policies. High quality design may impact viability.

persons and disabled people borne in mind.				
<i>Do not</i> require high quality design of buildings and public spaces promoting inclusive access, safety and security.	I&O 2005	Rejected		Scored negatively against the majority of social and environmental SA objectives.
UD3. Protect conserve and enhance historic features and areas of historic importance and special character, including: Listed Buildings (including locally listed); Archaeological Sites; Historic Gardens; Conservation Areas; and Residential Areas of Special Character	PO 2006	Carried forward to Option 7 PO 2008		The SA highlighted that a strict adherence to traditional design will restrict innovative design which may be required for lifetime homes, inclusive accessibility and climate change adaptation.
Option 7 Development, Protection of Character and Heritage and Urban Design	PO 2008	Carried forward to submission 2009.		Included requirement for environmentally responsible design and construction
Increased reference to heritage	Submission 2012	With increased reference to heritage (selected), without (rejected)		SA report at submission 2009 stated that CS2 should be setting the agenda with regards to heritage.
Further strengthening of heritage and historic environment	Further amendments 2012	Stronger reference to heritage (selected), without stronger reference to heritage (rejected)		Possible conflicts identified with viability and renewable energy infrastructure. Address through DMP.

CS3 Valued People			
Alternatives considered	Stage of preparation	Reasons for de/selecting	SA/SEA conflicts
Review the Council's existing allocation of employment land to determine those sites required for employment purposes and those suitable for reallocation to other uses.	I&O 2005	Economic Market Assessment carried out in 2008 to inform further stages of the CS.	N/A
Relax the Council's current policy on the protection of employment land whilst seeking to	I&O 2005	The option of seeking to retain identified key strategic sites and sites in town centres was carried through to PO.	There is conflict identified between losses of potential employment land to housing –

retain identified key strategic sites and sites in town centres (accepting that mixed use redevelopment may be acceptable on town centre sites)?			although this option was identified as positive for directing land use to PDL.
<i>Do not</i> relax the Council's current policy on the protection of employment land whilst seeking to retain identified key strategic sites and sites in town centres (accepting that mixed use redevelopment may be acceptable on town centre sites)?	I&O 2005	The option of seeking to retain identified key strategic sites and sites in town centres was carried through to PO	The SA commented that this could force residential development onto greenfield sites.
Continue the current focus of regeneration initiatives in the borough on areas such as Redhill Town Centre and borough housing estates.	I&O 2005	Carried forward in line with Corporate Plan objectives.	At Issues & Options, continuing the focus of regeneration initiatives in the Borough on larger areas scored positively over the whole range of sustainability criteria, as it provides more substantial opportunities to improve the social, economic and environmental fabric.
Broaden the current focus of regeneration initiatives to include smaller areas in the borough that are not reaching their potential.	I&O 2005	No new regeneration areas have been identified.	The SA concluded that although regeneration activity in these smaller areas may not meet such wide-ranging benefits as that in larger areas, the improvement in social terms is likely to be significant
E1. Include policies that provide for the more efficient re-use of existing employment land, subject to the results of an employment land review.	PO 2006	Carried forward to PO 2008 (Option 8)	Potential conflict identified between the use of land for business and land available for housing. Policy should be more defined relative to right amount,

			range, size etc.
E3. Include a commitment to work with parties, such as South East Economic Development Agency, the Surrey Economic Partnership and Surrey University to identify employment needs and facilitate the provision of appropriate accommodation such as starter units.	PO 2006	Not carried forward to PO 2008, but picked up again in principle in Submission 2009 (CS3)	Potential conflict identified between the use of land for business and land available for housing. Policy should be more defined relative to right amount, range, size etc.
Preferred Policy Approach 10 Regeneration	PO 2008	Carried forward to policy CS3. To not consider regeneration in the future could jeopardise the national and regional requirements to achieve an urban renaissance and positively influence place shaping.	SA identified the importance of design in ensuring urban open space, the public realm and green infrastructure to balance a policy of high density housing
Addition of reference to 'community support', recognition of distinct economic roles of different parts of the borough. Range and type of start-up premises, best use of employment land, use of LDOs	Outstanding Issues	Rewritten policy CS3 (selected), PO 2008 version (rejected). Updated to reflect economic evidence base update, changing policy landscape and new Corporate Plan.	Air quality and traffic congestion identified in relation to development of Redhill TC.

CS4 Allocation of Land for Development

Alternatives considered	Stage of preparation	Reasons for carrying forward / rejecting	SA/SEA conflicts
Build housing in a similar way to much of our existing urban areas, i.e. mainly detached and semi-detached housing, using pockets of underdeveloped land, previously developed non-residential land, and small pockets of the Green Belt.	I&O 2005	Building in Green belt not supported by consultation at this stage (rejected)	The SA commented that building in the Green Belt may increase car use.
Use a mix of mainly higher density housing (terraces, townhouses and flats) using pockets of underdeveloped land, previously developed non-residential land, but not the Green Belt.	I&O 2005	Carried forward in combination with other options.	This option could be enhanced by ensuring that development is allied to public transport provision and at a density sufficiently high (40+ dph) to create

			potential viability for combined heat and power
Allow very high-density housing (flats) in areas of high public transport accessibility, i.e. in town centres and along the A23 Transport Corridor, reducing the amount of development in other urban areas and not using the Green Belt.	I&O 2005	Carried forward in combination with other options	Scored similarly to option above
Combine Options 2 and 3 Allowing very high-density housing in town centres and along the A23 Transport Corridor, a mix of mainly higher density housing in other urban areas and safeguarding the Green Belt.	I&O 2005	Carried forward in combination with other options	As above
Direct higher density residential development to Redhill and along the A23 Corridor, formulating appropriate housing density ranges for these areas and the rest of the Borough, after taking into account a range of factors (the character of areas, public transport, public services, resource efficiency and environmental impacts).	PO 2006	Carried forward to PO 2008	The air quality risk of placing homes very close to busy roads needs to be further assessed and appropriate measures taken. Neither the issues of noise or light appear to be addressed elsewhere in the preferred options. There are no measures advocated to reduce the risk of pollution into the Borough's rivers/watercourses. Opportunities to further reduce the ecofootprint of regenerated urban areas should be sought.
Preferred Policy Approach 1 Spatial Location of Development Sustainable levels, locations and forms of development will be sought in accordance with the Borough stated objectives of this strategy and the objectives and policies of	PO 2008	Carried forward into policy CS4	SA stated that consideration should be given to the use of criteria in policy to ensure: quality of urban open space/public realm/green infrastructure, delivery of affordable housing, flood risk is

<p>the South East Plan and agreed NGP growth. Therefore strategic development in the borough will be directed to the following hierarchy of areas in the Borough: Redhill – as the Primary Regional Centre and a Regional Transport Hub, Reigate; Horley; and Banstead Village – as a focus for Town Centres Regeneration in the areas of Redhill Town centre, Horley Town Centre, Preston and Merstham. Two new neighbourhoods in Horley Other sustainable locations in the existing urban area</p>	<p>addressed in Redhill and Horley, infrastructure matches development in the long term, opportunities to improve access by public transport, cycling and walking are maximised, noise and light nuisance is limited, provision of open space in accordance with Natural England's ANGST and to avoid increased recreational pressure on the Reigate to Mole Valley Escarpment SAC.</p>		
<p>Preferred Policy Approach 12 Strategic Location of Housing</p>	<p>PO 2008</p>	<p>As preferred option 1</p>	<p>Scored favourably provided development was in sustainable locations. These options could be enhanced by ensuring that development is aligned to public transport provision and at a density of 40+ dph which would enable combined heat and power.</p>
<p>Policy CS5 (now amalgamated with policy CS4) but with Sustainable urban extensions removed.</p>	<p>Schedule A&B</p>	<p>Option with urban extensions (rejected) at the time due to SHLAA evidence. Without SUE (selected)</p>	<p>As the housing number was the same the SA scored negatively in relation to a number of identified issues associated with high density living in the urban area including climate change, noise and light.</p>
<p>References to sustainable urban extensions (SUE) reinstated.</p>	<p>Outstanding issues</p>	<p>With urban extensions (selected) due to updated SHLAA evidence. Without SUEs (rejected)</p>	<p>Due to SHLAA revisions it was necessary to include potential for urban extensions for future growth. SA gave recommendations regarding scale of</p>

			development and need for sustainable locations to be sought.
Broad locations for development	Outstanding issues	No more housing beyond SHLAA figures (rejected), Residential areas (rejected), UOL (rejected), flats above shops (rejected), Rural surrounds of Horley (selected), SUE into the GB (selected)	Negative scoring was given for no more housing in respect of the economy; the only options capable of delivering the quantity required were RSH and SUEs.
Different scales of Urban Extension / stand alone / employment land.	Further amendments 2012	None of the scales of urban extension were rejected at this stage due to no location given (concept only), employment land (rejected), stand-alone (rejected) due to only locations feasible are not near transport corridors, train stations etc.	At this stage the different scale options depended on the location.
Broad Areas of Search for SUEs	Further amendments 2012	See Sustainable urban extension SA report.	See Sustainable urban extension SA report.

CS5 Town and Local Centres			
Alternatives considered	Stage of preparation	Reasons for carrying forward / rejecting	SA/SEA conflicts
E2. Include policies that reinforce the multi-purpose role of town centres and local shopping areas by retaining and increasing provision of retail, social, community and leisure uses.	PO 2006	This policy was included at PO stage to reflect national guidance. There was no alternative at previous stages. Carried forward to PO 2008	Conflicts may occur with SA objective to decrease congestion.
Preferred Policy Approach 9 Regional, Town and Local Centres	PO 2008	Carried forward to submission 2009	SA commented that this policy could have a significantly beneficial effect on improving accessibility to all services and facilities, as well as facilitating the improving health and wellbeing of the whole population and reducing poverty and social exclusion. However, concerns

			<p>were raised about the unhealthy conflict between the wishes to increase the vitality and vibrancy of the town centre, and reduce the need to travel. It was suggested that the effects of travel would be unpredictable, suggesting that in increasing numbers of people using the town centres, car use may be increased. Policy options should be directed at reducing private car use. Addressed in CS15.</p>
Minor changes made for clarity and figures changed to reflect revised evidence.	Outstanding Issues	Amended for additional clarity and to reflect the revised retail and leisure evidence base.	Resulted in no change to SA scoring.

CS6 Area 1, 2a, 2b and 3			
Alternatives considered	Stage of preparation	Reasons for carrying forward / rejecting	SA/SEA conflicts
Area based policies were established through evidence provided by the Landscape and Townscape Character Assessment (June 2008)			
Area 2a (Redhill) Adopt a retail led strategy for regenerating and revitalising Redhill Town Centre, requiring a significant expansion of shopping in terms of quantity and range, in an effort to compete with Crawley / Croydon and complement Reigate.	I&O 2005	Redhill options carried into RAAP process	Competition for land with housing. There would be less balance of uses. May exacerbate the lack of activity and natural surveillance. Retail would increase traffic, thereby reducing air quality. Additional retail may encourage additional consumption.
Area 2a (Redhill) Adopt a business and employment-focused strategy for regenerating and revitalising Redhill Town Centre that aims to consolidate the employment area and make it more successful and attractive for companies and staff.	I&O 2005	Redhill options carried into RAAP process	Competition for land with housing. May exacerbate the lack of activity and natural surveillance. Development would increase traffic, thereby reducing air quality.
Adopt a leisure led strategy for regenerating and	I&O 2005	Redhill options carried into RAAP process	Competition for land with housing.

<p>revitalising Redhill Town Centre, building on the existing theatre and on the medium scale of the town centre and its pedestrian qualities.</p>				
<p>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.</p>	I&O 2005		Redhill options carried into RAAP process	Wider social benefits for option below.
<p>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.</p>	I&O 2005		Redhill options carried into RAAP process.	Balanced mixed-use strategy with a strong focus on culture and leisure was assessed as more likely to meet the wider needs of the local population.
<p>Focussed regeneration (F2a). No focus on regeneration (F2b)</p>	I&O 2005		Focussed regeneration (selected), No focus on regeneration (rejected)	A focussed approach could target areas of deprivation.
<p>Option 17 'regional, local and town centres'</p>	Preferred Options 2006		Selected	Regeneration could deliver social, economic and environmental benefits and that a focussed approach could target areas of deprivation.
<p>Option 18 'regeneration'</p>	Preferred Options 2006		Selected	Identified likely impacts and highlighted the importance of the need for environmental improvement and to maximise the benefits of access by public transport.
<p>Policy restructured and updated to reflect latest evidence on housing, employment and retail.</p>	Outstanding Issues		Figures changed to reflect latest evidence on housing, employment and retail (selected), leave policy unchanged (rejected)	See CS4 (strategic locations for growth)
<p>Figures updated</p>	Further amendments		Figures changed to reflect latest evidence on housing, employment and retail (selected), leave policy unchanged (rejected)	See CS4 (strategic locations for growth)

CS7 Gatwick Airport

Alternatives considered	Stage of preparation	Reasons for carrying forward / rejecting	SA/SEA conflicts
Continue to support a one runway, two terminals airport at Gatwick.	I&O 2005	Carried forward to PO	SA concluded that the existing airport will continue to attract an increasing number of passengers annually, which will see a continuation of environmental problems into the foreseeable future e.g. poor air quality in some parts of Horley. Resisting a further runway will encourage more effective use of the facility. The effect of increasing passenger numbers on the rail and road network capacity should not be underestimated in relation to this option.
T2. Continue to support a one runway, two terminals airport at, subject to satisfactory environmental safeguards being in place.	PO 2006	Carried forward to PO 2008 Option 21 Aviation	Not appraised as no change since I&O 2005 appraisal.
Support the development, within the Gatwick airport boundary, of facilities which contribute to the safe and efficient operation of the airport as a single runway, two terminal airport only. Oppose expansion at Gatwick Airport and intensification of Redhill Aerodrome.	PO 2008	Carried forward to Submission	Same as previous appraisal, and it was additionally considered that it was not of any additional value to appraise Redhill Aerodrome separately since the site lies in the Green Belt and significant intensification of development would be inappropriate. Planning applications are lodged in tandem with Tandridge DC and reference should be made to the Tandridge Core Strategy for comparable policy approach.

CS8 Sustainable Development

Alternatives considered	Stage of preparation	Reasons for carrying forward / rejecting	SA/SEA conflicts
Require more	I&O 2005	Carried forward	Small conflict with

environmentally responsible design and construction practices in the borough (waste, water, energy, air, adaptation to climate change etc.).			viability.
<i>Do not</i> require more environmentally responsible design and construction practices in the Borough (waste, water, energy, air, adaptation to climate change etc.)	I&O 2005	Rejected	Scored negatively against the majority of SA objectives.
UD2. Include policies requiring more environmentally responsible design and construction practices in the Borough (waste, water, energy, air, adaptation to climate change, biodiversity etc.) including: A requirement to provide for a proportion of the development's energy needs using on-site renewable energy generation; A criteria based approach for encouraging stand alone renewable energy schemes; and Protecting and enhancing existing areas of biodiversity value and links between them where appropriate.	PO 2006	Carried forward to PO 2008	Local distinctiveness can be a significant barrier to the challenges of climate change in particular. Requirements to incorporate renewable energy technology into individual buildings will undoubtedly involve new technology, some of which will need to be mounted on roofs/above ridgelines. Climate change adaptation may mean the use of non-traditional materials
Preferred Policy Approach 2 Sustainable Development Principles	PO 2008	Carried forward into CS8	Local distinctiveness can be a significant barrier to the challenges of climate change in particular. Requirements to incorporate renewable energy technology into individual buildings will undoubtedly involve new technology, some of which will need to be mounted on roofs/above ridgelines. Climate change adaptation may mean the use of non-traditional materials

Preferred Policy Approach 7 Development, Protection of Character and Heritage and Urban Design	PO 2008	Carried forward into CS8, heritage in CS3 submission 2009	The Preferred Option has not been specifically appraised since it is a checklist of a range of PPS criteria rather than a true option. A key finding of the appraisal of the spatial location of development (Preferred Option 1), however, identified the importance of design in ensuring urban open space, the public realm and green infrastructure to balance a policy of high density housing.
Additional points were added to the policy relating to neighbourhoods, pollution and climate change.	Submission 2012	Revised policy (selected) to increase sustainability credentials and address issues raised as part of SA process. Policy as submission 2009 (rejected)	In appraising this policy recommendations were given for the Sustainability checklist (DM).

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

the borough.			
Preferred policy approach 6 Sustainable construction	PO 2008	Carried forward with minor changes to Submission 2009.	The ability to deliver sufficient quantity of homes and commercial land the position should be monitored.
Updated to reflect buildings regulations requirements	Submission 2009	(Rejected) due to comments from the Inspector at the Examination in 2009 – the policy was not justified and lacked clarity	The ability to deliver sufficient quantity of homes and commercial land the position should be monitored. The suggestion was made to include a reference to clarify the parameters and priorities where abnormal costs of development may arise.
Updated to reflect current building regulations requirements	Submission 2012	The requirements of the policy at Submission 2009 were overtaken by building regulations requirements.	The SA recommended that certain elements of CSH should be maximised in particular areas, through the DMP.
This policy was significantly revised from previous version. New housing = or > building regs, Non-residential (inc extensions) BREEAM very good, Decentralised Energy Networks (incorporate/ investigate potential for).	Further amendments 2012	This was (selected) with changes made for clarity.	No change

CS10 Infrastructure			
Alternatives considered	Stage of preparation	Reasons for carrying forward / rejecting	SA/SEA conflicts
In areas in need of important community facilities and services consider the provision of facilities on urban open spaces surplus to requirements	I&O 2005	Provision of facilities on Urban Open Land has been rejected	Could conflict with biodiversity, loss of parkland/ allotments, must take account of flood risk. May result in permanent loss of green space. Term 'surplus to requirements' needs evidence.
Do not, in areas in need of important community facilities and services, consider the provision of facilities on urban open spaces surplus to	I&O 2005	Carried forward to PO	Green space may benefit social well being as much as community facilities.

requirements.			
H2. 'Plan, monitor and manage' the overall supply of new residential development in the Borough, setting out an intention to phase the rate at which large sites come forward for development, in order to ensure that development does not outstrip the capacity of local infrastructure and services.	PO 2006	Carried forward to PO 2008	The Sustainability Appraisal concluded that it was appropriate to require contributions to meet the needs of new developments.
CF1. Encourage proposals that would increase the range or 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.	PO 2006	Carried forward to Submission 2009	Potential conflict was identified between the necessary requirements of new infrastructure and constraints posed by the existing fabric/character assessments
CF2. Work with infrastructure and service providers and developers, to establish a programme for the adequate provision of new community facilities and infrastructure within the Borough.	PO 2006	Carried forward but through implementation part of CS11 Submission 2009	The Sustainability Appraisal concluded that it was appropriate to require contributions to meet the needs of new developments.
CF3. Secure contributions from new development (both big and small) towards the infrastructure required to meet the needs created by new development.	PO 2006	Carried forward to Submission 2009	The Sustainability Appraisal concluded that it was appropriate to require contributions to meet the needs of new developments.
CF4. It is proposed that the Core Strategy includes a commitment to review and seek to improve (where necessary) the quality and accessibility of our	PO 2006	Carried forward to Submission 2009	Protection and enhancement of natural, archaeological, historic environment and cultural assets can introduce potential conflict with the

parks and play facilities.			delivery of new community infrastructure.
Preferred Policy Approach 3 Plan Monitor Manage Option Sustainable levels, locations and forms of development will be delivered at a rate which reflects the adequacy of infrastructure and services to meet the needs of the development or alongside the ability to provide new or upgraded infrastructure. Develop an SPD on infrastructure contributions.	PO 2008	Carried forward to Submission 2009	The policy wording could emphasise how the infrastructure provided could be more in line with 'sustainable living' and give a greater indication of how adaptation to climate change could be incorporated.
Preferred Policy Approach 16 Community Facilities and Infrastructure	PO 2008	The Government has favoured the CIL approach, as it would capture more planning gain to finance additional investment in local and strategic infrastructure while preserving incentives to develop.	The preferred approach is in line with the Issues and Options and Preferred Options sustainability appraisal objectives.
UOL considered as land for housing delivery.	Outstanding Issues	Build on UOL (rejected)	Negative scoring mostly against social and environmental objectives.
Urban Open Land review criteria	Further amendments 2012	Criteria for UOL review (selected), policy with no criteria for review (rejected)	None

CS11 Housing delivery			
Alternatives considered	Stage of preparation	Reasons for carrying forward / rejecting	SA/SEA conflicts
Preferred Policy Approach 11 Housing Delivery. To deliver numbers as put forward by SE plan panel report August 2007 (New Growth Point status)	PO 2008	NGP status required us to deliver housing at an accelerated rate; this rate of delivery was in line with levels of applications for acceptable development at the time. SE plan figure changed – not carried forward for this reason.	There is a risk of an overprovision of small units. In addition design criteria may be necessary to ensure quality of urban open space, the public realm and green infrastructure. It may be necessary to consider measures to avoid or mitigate

			increased recreational pressure on the Reigate to Mole Valley Escarpment SAC. Consideration should be given to including flood risk infrastructure within the policy, with particular reference to Redhill and Horley.
Housing figure of 9,240 put forward in draft SE plan	Submission 2009	Housing delivery figure in line with regional strategy.	SA commented that sustainability issues arising from increased level of housing development could be addressed through design.
Housing figure of 10,000 and 12,500 tested post submission	Suggested Modifications to the Inspector	Higher housing figure was tested to post submission 2009 in order to prove some level of flexibility in the housing figures, this also coincided with removal of reference to urban extensions in policy CS4 (rejected)	This lead to conflicts related to high density development in the urban area – such as flood risk, air quality, green space and noise and light pollution.
Range of housing delivery tested from 300pa to 980pa	Outstanding Issues	The highest positive score was between 420-500pa. (selected)	SA issues related to not providing enough affordable housing at the lower end of the scale, and at the higher end of delivery scale issues associated with flood risk, air quality, green space and noise and light pollution were commented on, although it was acknowledged that these issues could be addressed through design.

CS12 Housing needs of the community			
Alternatives considered	Stage of preparation	Reasons for carrying forward / rejecting	SA/SEA conflicts
Build housing in a similar way to much of our existing urban areas, i.e. mainly detached and semi-detached housing, using pockets of underdeveloped land, previously developed non-residential land, and small pockets of	I&O 2005	Building in Green belt not supported by consultation at this stage.	Potential conflicts identified with flooding, accessibility, light pollution, noise, biodiversity, congestion and the need to travel.

the Green Belt.			
Use a mix of mainly higher density housing (terraces, townhouses and flats) using pockets of underdeveloped land, previously developed non-residential land, but not the Green Belt.	I&O 2005	Carried forward in combination with other options	This option could be enhanced by ensuring that development is allied to public transport provision and at a density sufficiently high (40+ dph) to create potential viability for combined heat and power
Allow very high-density housing (flats) in areas of high public transport accessibility, i.e. in town centres and along the A23 Transport Corridor, reducing the amount of development in other urban areas and not using the Green Belt.	I&O 2005	Carried forward in combination with other options	Scored similarly to option above
Combine Options 2 and 3 Allowing very high-density housing in town centres and along the A23 Transport Corridor, a mix of mainly higher density housing in other urban areas and safeguarding the Green Belt.	I&O 2005	Carried forward in combination with other options	As above
H3. Secure the right mix of new housing sizes and types in the Borough to: Meet identified shortfalls in different areas; and To meet future needs.	PO 2006	Carried forward to PO 2008	At both Issues & Options and Preferred Options consultations there was strong support for providing the right mix and types of new housing.
Preferred Policy Approach 13 Providing the Appropriate Type and Housing Mix	PO 2008	Carried forward to submission 2009	The Sustainability Appraisal concluded that it was appropriate to seek to meet housing needs.

CS13 Affordable Housing			
Alternatives considered	Stage of preparation	Reasons for carrying forward / rejecting	SA/SEA conflicts
Lower the threshold size at which new housing developments are required to provide affordable housing.	I&O 2005	Carried forward	None
<i>Do not</i> lower the	I&O 2005	Rejected	In the longer term

threshold size at which new housing developments are required to provide affordable housing.			supply of larger sites may be reduced and therefore limited affordable housing will be delivered.
Increase the percentage of affordable housing required on new housing developments that trigger the threshold.	I&O 2005	Carried forward	Option increases the overall provision of affordable housing, however the degree of social stratification will be worse. Also the viability and longer-term supply could be affected as a result of the higher financial burden on specific sites.
<i>Do not</i> increase the percentage of affordable housing required on new housing developments that trigger the threshold.	I&O 2005	Rejected	A continuation of the existing threshold means that the longer-term supply is at risk, as the number of these larger sites is finite.
Provide affordable housing on Greenfield sites as an exception to current policy.	I&O 2005	Rejected	SA commented on conflicts of accessibility, flooding, soil quality and quantity, biodiversity, air quality, the need to travel and ecological footprint.
Require payments towards affordable housing from new commercial development.	I&O 2005	Rejected	Although the Issues and Options sustainability appraisal was equivocal about the value of this option, the Council considers that the risk of making commercial development proposals unviable outweighs the possible benefits of this approach.
Provide affordable housing on employment sites as an exception to current policy.	I&O 2005	Rejected	Conflicts with levels of employment, local employment opportunities, and commercial development.
<i>Do not</i> provide affordable housing on employment sites as an exception to current policy	I&O 2005	Carried forward to support draft objective 4 (PO 2006)	Provision of affordable housing.
H4. Include an affordable housing policy that requires: All new housing	PO 2006	Increased to 40% for PO 2008	There was concern that additional costs of affordable housing could limit funding for the introduction of

<p>developments comprising 15 dwellings or more to provide at least 35 per cent of housing as affordable; and For housing developments that fall below 15 dwellings, require a financial contribution towards affordable housing so that it can be provided elsewhere in the Borough.</p>			<p>sustainable energy measures. Also there was concern regarding potential conflict between the needs of residents (e.g. mobility; climate change adaptation) and the character of an area/local distinctiveness.</p>
<p>H5. Set out an appropriate mix of affordable housing to be provided as social rented, affordable home ownership and / or intermediate rented accommodation.</p>	PO 2006	Taken forward to PO 2008	As H4 above
<p>Preferred Policy Approach 15 Affordable housing 15 dwellings or more to provide at least 40 per cent of housing as affordable;</p>	PO 2008	Carried forward to Submission 2009 (rejected)	<p>Support for more affordable housing across all social SA objectives. Different threshold levels and percentages of affordable housing required by a development were considered in the Affordable Housing Viability Study. These were also tested against other factors such as the requirement to make infrastructure contributions. This preferred approach is in line with the Issues and Options sustainability appraisal recommendations.</p>
<p>30% affordable housing on sites of 15 or more</p>	Submission 2012	30% AH (selected) due to viability testing, 40% - as submission 2009 (rejected)	<p>SA recommended increasing AH provision on SUE to make up shortfall. Change made to supporting text of CS13 to do this.</p>

CS14 Gypsies, Travellers and Travelling Showpeople

Alternatives considered	Stage of preparation	Reasons for carrying forward / rejecting	SA/SEA conflicts
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H6. Include policies for those groups with special housing needs, including setting out how the Council would consider proposals for gypsy sites in the Borough, taking into account the Gypsy and Travellers housing needs joint study.	PO 2006	Mixed comments about the need for adequate provision, the need for research and evidence about accommodation needs, and the use of Green Belt in special circumstances – Gypsies and Travellers. Carried forward.	Not appraised at this stage. The East Surrey authorities considered two options for the distribution of additional pitches.
Preferred Policy Approach 14 Gypsies and Travellers and Travelling Showmen	PO 2008	Carried forward to Submission 2009	Where sites are provided in more urban locations, there would be improved accessibility and integration. The criteria provide an appropriate range of consideration to ensure adverse impacts can be avoided.
As PPA 14 with changes for clarification	Submission 2009	(Rejected) due to ineffectiveness and conflict with national policy regarding provision for gypsies and travellers.	As above
The policy was rewritten to include locally arising needs, sequential approach to allocation, suitability criteria for allocation and safeguarding sites from development unless no longer required.	Schedule A & B	Partly selected with modifications.	Scored well for consideration of space for business needs and for considering urban areas first for the sites, thereby giving good access to facilities and services, reducing social exclusion and the need to travel
Inclusion of 5 year supply of pitches / plots	Further amendments	With 5 year supply (selected) in line with national guidance, without 5 year supply (rejected)	Local need must be addressed as a priority. Scored well due to increased access to schools and healthcare.

CS15 Travel options and accessibility			
Alternatives considered	Stage of preparation	Reasons for carrying forward / rejecting	SA/SEA conflicts
Require developments with potential to generate a lot of traffic to include measures to minimise car use, for example subsidies for public transport,	I&O 2005	Carried forward	None identified

provision for cycling, car sharing schemes and less car parking.			
Review parking standards to allow different levels of off-street and on-street parking provision depending on an area's accessibility to services by walking, cycling and public transport.	I&O 2005	Carried forward to PO 2006	The SA concluded that this is an option, which in some circumstances could benefit accessibility at an environmental cost; its attraction to some residents could create a vicious circle of more dispersed development and consequently more car-dependence. However this option is developed, it may be seen to be a blunt policy instrument as long as there is no Article 4 direction removing permitted development rights for the creation of hard standing and other parking areas within the cartilage.
T3. Review parking standards to allow different levels of off-street and on-street parking provision depending on an area's accessibility to services by walking cycling and public transport.	PO 2006		As above and additional comments were made concerning the risk of climate change impacting on transport infrastructure is high
Support initiatives to increase the capacity and quality of road and rail infrastructure in the borough.	I&O 2005	Carried forward	Assumptions about the ability of current rail services to cope with additional development should not be lightly made. Development focussed on public transport hubs may only be viable with additional support.
Improve provision for cyclists and pedestrians in the borough.	I&O 2005	Carried forward	No conflicts identified at this strategic level
T1...More specifically, the Council will work with relevant agencies to: Secure an extension to the 'Fastway' bus-based public transport system from Horley to Redhill and Reigate; Support and increase in capacity on the	PO 2006	Carried forward in part to submission 2009, fastway omitted due to project delivery completion.	SA concluded that the risk of climate change impacting on transport infrastructure is high

London to Brighton railway line;
 Expand the cycle network in the Borough;
 Secure significant improvements to the arrangements for interchange between bus and rail particularly in the quality of facilities, integration and frequency of services, upgrading infrastructure where necessary; and
 Link public transport improvements to town and village centre parking strategies.

T4. Include policies that ensure development proposals:

Are capable of being served by safe and convenient access to the highway network and public transport;

Do not give rise to traffic volumes that exceed the capacity of the local or strategic highway network;

Do not cause harm to the character of the surrounding area as a result of the amount or type of traffic or additional parking generated;

Be accompanied by a transport assessment, or transport statement depending on upon the size of the scheme and its potential impact;

Be accompanied by a travel plan, where schemes could have significant implications for movement, in areas where air quality is poor or where traffic congestion is a recognised problem; and

Provide high quality pedestrian / cycle infrastructure.

PO 2006

Carried forward in part to submission 2009 CS16

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

Preferred Approach Accessibility	Policy 19	PO 2008	Carried forward to policy CS17 (Submission 2009)	
Preferred Policy Approach 20 Parking		PO 2008	Carried forward to policy CS18 (Submission 2009)	SA raised the issue that its attraction to some residents could create a vicious circle of more dispersed development and consequently more car-dependence.
Policies amalgamated CS16 (travel options), CS17 (accessibility) and CS18 (Parking)		CS18 deleted in Suggested Modifications to the Inspector, CS16/17 in Submission 2012	Supporting text and policy restructured for clarity and to reflect latest evidence.	SA was not revised.