

## Contents

---

<b>1. Non technical summary.....</b>	<b>3</b>
1.1 Background.....	3
1.2 Role of Sustainability Appraisal.....	3
1.3 Sustainability Appraisal Methodology.....	3
1.4 Findings of the Sustainability Appraisal.....	4
1.5 Monitoring.....	7
<b>2. Background.....</b>	<b>8</b>
<b>3. SA/SEA Methodology.....</b>	<b>9</b>
3.1 Scoping.....	9
3.2 Alternatives.....	10
3.3 Absolute Constraints.....	13
3.4 The Appraisal.....	16
3.5 Predicting the effects of the alternatives.....	16
<b>4. Results.....</b>	<b>18</b>
4.1 Table summarising the results for the appraisal of each Broad Area of Search.....	19
4.2 Table showing results of SA incorporated into plan making process, showing favoured areas for urban extensions.....	26
4.3 Cumulative Impacts.....	28
4.4 Further Appraisal Requirements.....	29
<b>5. Monitoring.....</b>	<b>29</b>
<hr/>	
Appendices	
Appendix A – Requirements of the SEA Directive.....	30
Appendix B – SA objectives and decision aiding questions.....	32

Appendix C – Scoping Report (Revised September 2012).....	37
Appendix D – Broad Area of Search (BAS) summary sheets.....	209
Appendix E – Alternatives options for spatial location of development.....	359
Appendix F – SA Matrices for different scales / options for BAS.....	367
Appendix G – SA Matrices for each individual BAS.....	394

# 1. Non technical summary

---

## 1.1 Background

- 1.1.1. The submitted Core Strategy (CS) sets out a long term strategy for growth and development in the borough. In the short to medium term, over the first 10 years, priority is given to regeneration and making the best use of the development opportunities that exists in the urban area. In the longer term, the submitted Core Strategy identifies that some greenfield development will be required to accommodate sustainable urban extensions.
- 1.1.2. Following submission, the Core Strategy Inspector identified some key concerns about the approach taken to sustainable urban extensions (SUE) in the submitted document. It was decided at an Exploratory Meeting that further technical work would be carried out to identify the **broad geographic location of SUEs and their likely scale and timing.** This Sustainability Appraisal Report documents the sustainability testing that was undertaken to inform the identification of preferred 'broad locations' for urban extensions.

## 1.2 Role of sustainability appraisal

- 1.2.1 Sustainability Appraisal is a process designed to ensure that social, environmental and economic impacts are considered when formulating planning policies and proposals. Policy/proposal options are assessed against a set of 19 Sustainability Appraisal Objectives (SA Objectives) in order to make recommendations regarding the sustainability of each of the BAS. The objectives include protection of important habitats, protection of heritage interests, provision of affordable housing and the maintenance of a robust and flexible economy.
- 1.2.2 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).

## 1.3 Sustainability appraisal methodology

- 1.3.1 Appraisal of the Core Strategy including the spatial location for development has been conducted by a group of Planning Officers from Reigate & Banstead

Borough Council and neighbouring Planning Authorities. The group convened a series of meetings where potential impacts of different options were predicted by comparing the policies and proposals of the Core Strategy against the Sustainability Appraisal Framework.

- 1.3.2 At this stage, two main sets of alternatives were assessed: firstly alternatives relating to how growth could be accommodated (the scale/type of development), and secondly, where growth could be accommodated (testing of a number of 'broad areas of search' (BAS). For the appraisal of the BAS a group of officers from Reigate & Banstead Borough Council compared the alternative options against the sustainability objectives and in so doing made recommendations in respect of scale and location of development. The results have been verified by an independent expert.
- 1.3.3 These SA recommendations were then fed into the wider 'plan-making' process, which considered other constraints and opportunities across the BAS. This included consideration of the purposes of the Green Belt and overall fit with the spatial strategy, and was carried out separately from, but informed by the SA. The findings of the SA and this additional testing were then brought together to identify preferred broad locations for urban extensions for inclusion within the Core Strategy.
- 1.3.4 In making predictions about the likely impacts of the BAS, a revised Scoping Report has been used which highlights the significant sustainability issues across the borough. The scoping report was consulted on for 6 weeks through August and September 2012.
- 1.3.5 The Scoping Report is the document that aims to set out a detailed description of the three elements of sustainability: the social, environmental and economic conditions within and affecting the Borough. By considering reports, studies and data on various aspects of these topics a broad picture can be established with respect to sustainability issues. The Scoping Report has been reproduced as Appendix C.

## 1.4 Findings of the sustainability appraisal

- 1.4.1 The appraisal was carried out at a strategic level and looked at the potential for each area to accommodate a 'strategic-scale' urban extension, which by their very nature are large scale (at least 250 dwellings). The conclusions of this appraisal indicate whether or not a **broad area** of search is a sustainable option for a strategic scale urban extension, and does not preclude the

possibility of limited small scale development within any of the search areas identified. Within each of the search areas there will be a range of factors which would affect the score of a sustainability appraisal at a site specific scale. When preferred areas are selected further SA/SEA work will be required in order to give more detailed and design specific recommendations for each area.

- 1.4.2** The Sustainability Appraisal recommended that the following areas should be short-listed for further investigation to accommodate potential urban extensions: **A, G, J, L, M and N**. The areas of search can be seen on the map below (Figure 1).
- 1.4.3** The findings from the SA were fed into the wider plan making process, and combined with other factors such as the impact on Green Belt function and fit with the overall spatial strategy; through this exercise, the following areas were selected as possible areas to accommodate strategic-scale Urban Extensions:
- East of Redhill and East of Merstham
  - South and South West of Reigate (Woodhatch)
- 1.4.4** Despite SA finding that areas A, M and N have relatively strong sustainability credentials, these areas have been rejected as part of the wider selection process. They have been rejected for reasons outside of the SA remit including their importance to either strategic or local Green Belt function, or their lack of fit with the overall spatial strategy for the borough. Area L was identified as being an area with long term development potential (beyond this plan period). For information on the wider plan making process for urban extensions please see *Sustainable Urban Extensions: Broad Geographic Locations Technical Report (November 2012)*.
- 1.4.5** The next stage of the planning process will involve consideration of more detail about the size, location and nature of the urban extensions. This will be undertaken through the preparation of the Development Management Policies Document.
- 1.4.6** Sustainability Appraisal will be carried out to inform the Development Management Policies Document process, and will assess the areas at a more refined scale, within defined boundaries and at a site specific level. This will allow the SA to put forward recommendations that will enrich the sustainability of future urban extensions by maximising benefits and mitigating adverse impacts.

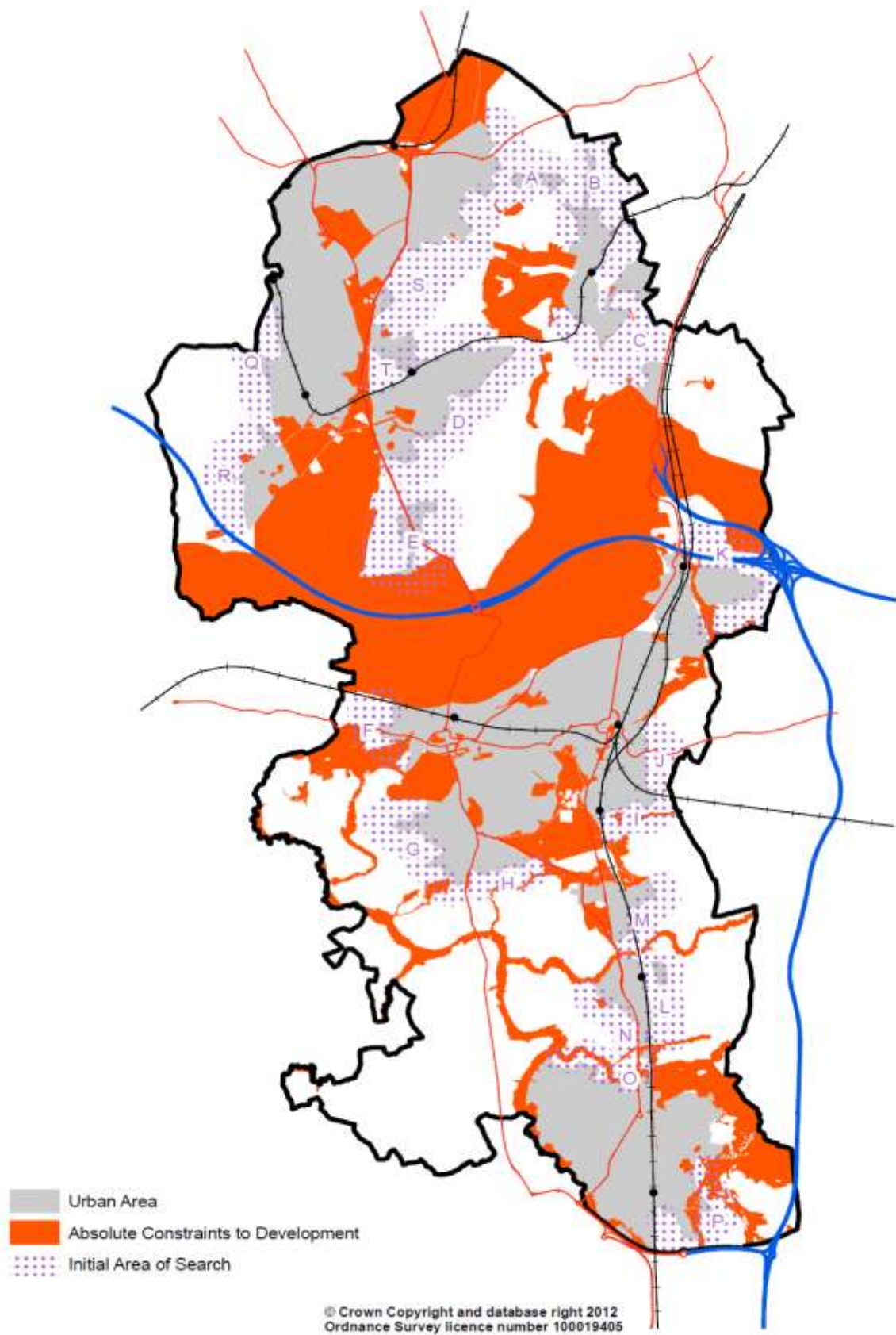


Figure 1. Map showing Broad Areas of Search

## 1.5 Monitoring

- 1.5.1 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.
- 1.5.2 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, including Sustainable Urban Extensions, on economic, social and environmental interests.
- Environment and flooding
  - Avoiding harm to AONB, SAC, SSSI
  - Congestion and accessibility
  - Air quality

## 2. Background

---

- 2.1 The **purpose** of Sustainability Appraisal (SA) is to identify and consider the likely implications to social, environmental and economic interests of meeting the development needs of the borough. It informs the plan making process in that it examines the sustainability credentials of different options such that a balanced approach can be taken to spatial planning.
- 2.2 The **policy context** and details of **previous consultation** can all be seen in the Core Strategy SA report (Submission 2012).
- 2.3 The **aim** of this appraisal is to ensure the search for sustainable urban extensions takes full account of the requirements of SA/SEA.
- 2.4 The context for the appraisal has been set through analysis of Plans, Policies and Programmes (PPPs) that may have influence on the SA framework and on the appraisal of the alternatives. A list of PPPs can be seen as Appendix B of the Core Strategy SA report (Submission 2012).

## 3. SA / SEA methodology

---

Requirements of SEA, “An environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account its objectives and geographical scope, are identified, described and evaluated”

### 3.1 Scoping

Stage A: Setting the context and SA objectives, establishing the baseline and deciding on the scope.

- 3.1.1 The SA framework and objectives have been prepared through joint working with other East Surrey authorities. The SA objectives and decision aiding questions have been recently (March 2012) revised and updated. The revised objectives were consulted on with the statutory bodies, and responses were taken into account. There are now 19 objectives and these can be seen, with the decision aiding questions, in Appendix B.

The stage of the SEA process that determines the content and extent of the matters to be covered in the SEA report to be submitted to a competent authority is obligatory under SEA

- 3.1.2 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. Please see Appendix C for the scoping report. The scoping report sets out the overall sustainability issues for the borough, and guides the weighting of the appraisal. In addition to this borough-level scoping report, a comprehensive assessment of constraints and opportunities for each geographic broad area of search being appraised were prepared which included a wealth of more detailed information including accessibility, designations and environmental health issues. These summary sheets were prepared in consultation with external and internal experts, and were used to guide the appraisal. The summary sheets can be seen in Appendix D.
- 3.1.3 The scoping report highlighted some key sustainability issues that need to be considered throughout the plan making process. These headline issues will be used to help assess whether or not a potential area of search is put forward, and are:
- Environment and flooding
  - Avoiding harm to AONB, SAC, SSSI

- Congestion and accessibility
- Air quality

3.1.4 The scoping report highlighted potential positive actions that could be addressed through the plan making process, these are:

- Housing need and affordable housing
- Provision for Gypsies, Travellers and Travelling Showpeople
- Support for business start ups
- Pockets of deprivation

## 3.2 Alternatives

Stage B: Developing and refining options and assessing effects.

3.2.1 Options / alternatives have been developed in order that they can be tested against the SA objectives, and that the predicted effects of each alternative can be documented.

The SEA requires an assessment of reasonable alternatives. The report should include an outline of the reasons for selecting the alternatives dealt with.

3.2.2 The appraisal of alternatives needs to be relevant to the level of decision that is being made, for example whether it is high level strategic or a more detailed site decision. The search for potential areas for development in the Green Belt has alternatives from the outset relating to whether or not to build in the Green Belt at all. These alternatives are:

- Further urban intensification beyond 2022
- Allow development on land currently in the Green Belt
- Do not meet the housing demand

3.2.3 SA/SEA has already been carried out on these high level strategic options and different times in the production of the Core Strategy. At submission (January 2009) housing figures of 9,400, 10,000 and 12,000 were appraised, then Suggested Modifications to the Inspector were made (July 2009) which appraised the same spatial strategy but without urban extensions (urban intensification). For a table showing the full range of alternatives tested, in relation to the spatial location of development, from Issues and options 2005 to the current version please see Appendix E.

3.2.4 Since the Core Strategy was initially submitted (2009) a number of strategic alternatives for the location of housing to fulfil the shortfall of housing land identified (the latest evidence in the 2012 SHLAA being that this is up to 1600 homes in the period beyond 2022) have been appraised:

- No new housing (beyond SHLAA 'known urban land supply' figures)
- More intensive development in residential areas
- Development on Urban Open Land and other green space
- Flats above shops
- Development on the Rural Surrounds of Horley
- Sustainable Urban Extensions (likely to be Green Belt)

3.2.5 For the full results of these appraisals please see the Core Strategy SA report (Submission 2012), or for a summary of why these alternatives were selected or rejected, please see Appendix E.

3.2.6 Following on from the appraisal of these options, as part of the work undertaken in relation to urban extensions, further alternatives have been appraised, still at a strategic level, but more focused on Green Belt extensions. At this point in time, the location was an unknown and the appraisal was carried out on the concept of each option.

- A number of small urban extensions (approx. 10 extensions of 100 to 300 dwellings).
- 2 or 3 medium urban extensions (2 or 3 extensions of approx. 500 to 700 dwellings).
- One large urban extension of 1500 to 2000 dwellings.
- One stand-alone settlement of approx. 2000 dwellings.
- One stand-alone settlement of approx. 5000 dwellings.
- The option of developing on employment land was appraised at this point.

For the full results of these appraisals please see Appendix F, or for a summary of why these alternatives were selected or rejected, please see Appendix E. A summary of the results from these appraisals can be seen in the table below.

Type / size of extension(s)	Summary of SA findings
One large extension (1500-2000 dwellings)	One large development of between 1500 and 2000 houses scores positively against a number of sustainability objectives, such as decentralised energy systems, economic growth, reducing the need to travel, accessibility and health and wellbeing. A number of these objectives scored well due to the provision of new infrastructure which would be enabled through development at this scale, such as a school and community facilities. There were a number of unknowns in this appraisal as location would be crucial in determining the outcome of development scored against several sustainability objectives. Overall, this option has the potential to be sustainable, as assessed within the bounds of no information on location. Further sustainability assessment is required taking into account the location of each potential area of search.
2 or 3 medium sized extensions	As there is currently no information on location, there is nothing

(500 – 700 dwellings)	<p>in the appraisal that suggests that urban extensions of this size would be less sustainable than one large or several small. There are some positives associated with potentially less severance of habitats and potentially less impact on historic areas than with one large extension, but again this is very much dependent on location. The size is such that there may be the opportunity for the provision of some infrastructure, but this will be dependent on the location, and what is available in the vicinity already. Overall, this option has the potential to be sustainable, as assessed within the bounds of no information on location. Further sustainability assessment is required taking into account the location of each potential area of search.</p>
Several smaller sized extensions (100 – 300 dwellings)	<p>Many of the positive scores for small extensions are unknown as the scoring is so dependent on the location. The scoring for a large extension can be slightly more positive in this respect as the scale allows the provision of infrastructure. Small extensions will have to rely on existing infrastructure in most cases, and therefore the scoring is highly reliant on knowing the location. Overall, this option has the potential to be sustainable, as assessed within the bounds of no information on location. Further sustainability assessment is required taking into account the location of each potential area of search.</p>
Stand alone settlement (2000 dwellings)	<p>The stand alone settlement scores positively over a number of sustainability objectives, and is similar in sustainability credentials to one large extension. Negative scoring can be seen against making best use of PDL and buildings, and biodiversity. Landscape and water quality have possible negatives against them, dependent on location. The only areas within the borough that could have a SAS (from the point of view of not coalescing with an existing urban area) are North East and South West of the borough. From a delivery point of view a SAS could be identified and safeguarded for delivery at the end of this plan period, and enable future housing delivery outside of this planning period. Much of the positive scoring in this appraisal is due to the provision of infrastructure, facilities and transport to serve the new settlement; however it would benefit from being close to the rail and road network, indicating that <i>in the context of this borough an urban extension would fulfil these criteria better than a stand-alone</i>; again this would be dependent on location. Overall, this option has the potential to be sustainable, as assessed within the bounds of no information on location. Once a decision has been made as to what type/ size of development is preferred, further sustainability appraisal will need to be carried out on alternative locations.</p>
Employment Land	<p>This option scores double-negative for two of the SA objectives, and indicates a restriction to economic development and growth should this option be taken forward. If there was an oversupply of employment land in the borough then some could be taken without too much detriment, however this is not the case as the land required for 1,600 homes would far exceed any negligible take of employment land. The only mitigation to these double-</p>

	negative scores would be to designate other areas of employment land, which may then conflict with housing land supply in any case. The decision could be taken to designate employment areas on land outside of the urban area; however these may not be accessible and may contribute to land contamination issues. There are positive impacts associated with this option; however the negative scoring for the economic pillar of sustainability makes this unbalanced and unsustainable as a strategic growth option, both in the short and long-term.
--	---

**3.2.7** The SA rejected developing on employment land at this stage. The SA did not reject any of the other above options for this round of testing at this stage on grounds of sustainability, although it was suggested that in the context of this borough an urban extension would be more likely to score more positively than a stand-alone extension. There were many question marks over certain sustainability objectives as location was unknown and this would have a great impact on objectives such as landscape, biodiversity, accessibility, travel and economy. The options were then analysed in relation to their deliverability and the scale and timing of delivery in order to fulfil the housing requirements as set out in the Core Strategy. At this stage it was identified that in order to deliver 1600 homes over 5 years, more than one extension would be required in order to make the allocations deliverable and flexible. This decision meant that the extensions would be of a smaller scale than would be necessary to deliver a stand-alone settlement with all necessary infrastructure, although it could be possible to deliver phase 1 of a larger development (e.g. first 500 of 1500) alongside smaller developments. The concept of urban extensions compared to stand-alone settlements was also considered to fit better with the overall spatial strategy for the borough.

**3.2.8** The next stage of appraisal looked at broad areas of search (BAS). 20 areas of search were identified and appraisal was carried out on each of them. The map below shows the BAS. They were selected by shading areas around the existing urban areas on a map that had already filtered out absolute constraints to development (see below). Broad areas of search as far as possible cover every piece of land adjoining the urban edge, other than those filtered out as absolute constraints. The areas were selected because they adjoin the existing urban area.

### **3.3 Absolute constraints**

**3.3.1** A number of 'areas of constraint' have been screened out of the process at an early stage as 'absolute' constraints. These absolute constraints are AONB, SAC, SAC buffer, SSSI, flood zone 3, historic parks and gardens and common

land. Under the SEA Directive<sup>1</sup>, an assessment of 'reasonable alternatives' must be undertaken in order to determine significant environmental effects. It is considered that the above mentioned absolute constraints are not *reasonable* alternatives for large scale growth as they would all have significant long-term irreversible detrimental impacts on the environment, or development would compromise the safety of residents (such as flood zone 3). It is for this reason that they have not been appraised through Sustainability Appraisal as reasonable alternative options.

---

<sup>1</sup> EU Strategic Environmental Assessment (SEA) Directive 2001/42/EC

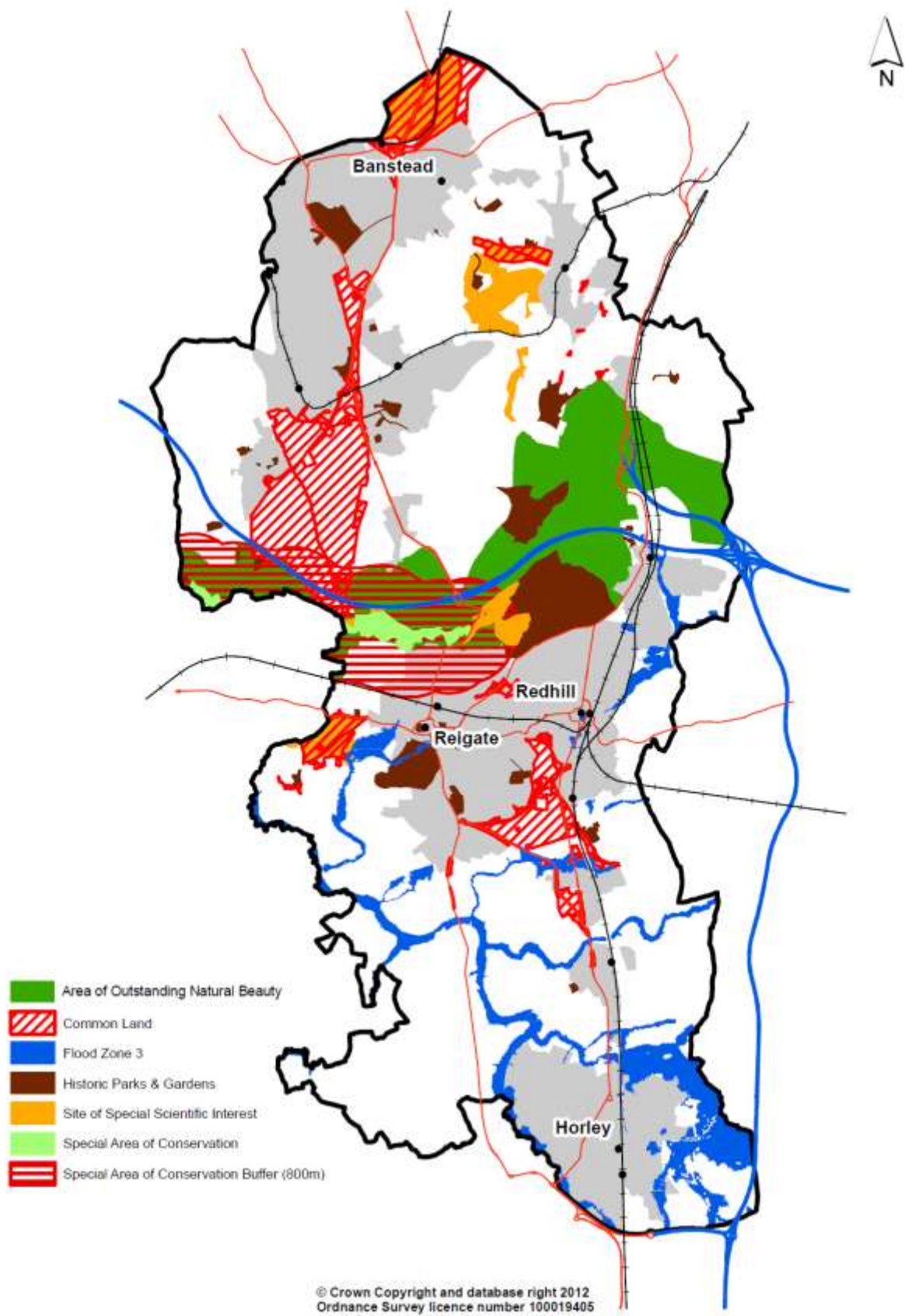


Figure 2. Map showing areas of constraint that were screened out at the first stage of the process.

### 3.4 The appraisal

- 3.4.1 The appraisal of the BAS was carried out on 3<sup>rd</sup> October 2012 by a panel of Council Officers. Officers were selected on the basis that they brought a diverse and broad subject knowledge base to the appraisal. The panel consisted of:

Table 1: Appraisal Officers

Officer	Area of expertise
<b>Caroline Keogh</b>	SA/SEA facilitator
<b>Alison Robinson</b>	Housing policy, affordable housing, Gypsies and Travellers
<b>Prem Velayutham</b>	Design, Parking,
<b>Raymond Dill</b>	Environment, Sustainable development, low carbon technologies

- 3.4.2 In order to ensure that the process was carried out in an unbiased and impartial manner, the methodology and results were independently verified by an Independent Consultant.
- 3.4.3 Through the appraisal process a number of conclusions were made with respect to the sustainability credentials of each BAS. Judgements were formed by using the scores and comments made through the appraisal, and giving weight to certain SA objectives on the grounds of the issues identified in the scoping report, and on whether the impacts would be long term / irreversible. In this way the relative sustainability credentials of different options were identified to inform which areas might be brought forward in the Core Strategy for more detailed assessment through the Development Management Policies Document.

### 3.5 Predicting the effects of the alternatives

- 3.5.1 The magnitude (capacity) and geographic scale of each of the BAS has been judged as broadly similar for the sake of this strategic appraisal. Recommendations have been made as to which scale of development would be most appropriate for different areas of search. For example, Area L has been highlighted as being particularly sustainable at a very large scale (>2000 dwellings) where as Area B may be suitable for limited small scale development.

3.5.2 The time period in which these alternatives would be developed is potentially the same for all of the BAS, this would depend on the delivery of housing in the urban area and windfall sites. There are effects from the development of these alternatives that would be permanent or temporary. The permanency of effect has been used to give more weight to an SA objective, should the scoring be balanced at the end of the appraisal. An example of this is with BAS that are sensitive in terms of landscape that would be irreversibly affected by development, and the changes would be long term, such as Area B. There are a number of positive impacts associated with development in BAS B, but the landscape (particularly views) would be irreversibly affected, so the area has not been selected as a potential area for an urban extension.

### **3.6 Preferred Areas**

3.6.1 Where recommended by the SA, BAS were then put forward into the wider process of selecting areas for urban extensions. This process took into consideration other objectives that are not covered by the SA. These included strategic Green Belt purposes such as:

- Strategic gap – checking unrestricted sprawl of built up areas
- Local Gap – preventing neighbouring towns/ settlements merging
- Protecting the setting / special character of historic town
- Contributing to the openness of the Green Belt.

3.6.2 A further objective that was considered as part of the wider process was whether an urban extension in the area would fit with the overall spatial strategy for the borough (CS4), which has already been appraised and consulted upon. The plan makers took into consideration the findings of the SA, coupled with the outcomes of assessing the areas against the further objectives of Green Belt and spatial strategy fit, to formulate overall recommendations for broad locations for urban extensions.

## 4. Results

---

- 4.1.1 Below is a table summarising the results for the appraisal of each Broad Area of Search. For the full appraisal matrices, including the scoring given for each SA objective, please see Appendix G.
- 4.1.2 The appraisal was carried out at a strategic level and looked at the potential for each area to accommodate an urban extension (of a strategic scale). Within each of the search areas there will be a range of factors which would affect the score of an appraisal for a smaller sized opportunity and at a more detailed level of assessment. The conclusions of this appraisal indicate whether or not a broad area of search is sustainable for an urban extension, and **does not preclude the possibility of limited small scale development within any of the search areas identified.** When preferred broad locations for urban extensions are selected further SA/SEA work will be required to inform detailed site allocations and to give more detailed and design specific recommendations for each location.
- 4.1.3 The SA process has led to recommendations as to which BAS are the most sustainable and therefore should be 'short-listed' for further investigation to accommodate urban extensions. As part of this process professional judgement has been used to determine the extent of likely impacts, and whether impacts are significant when compared with the baseline for a particular area. This is only part of the bigger picture, and the results from the SA have been fed into a wider process which has taken into account other considerations such as Green Belt function and fit with the overall spatial strategy. This means that areas recommended through the SA may not have been taken forward and visa versa. Table 3 shows the reasons for these decisions that have been made outside of the SA process as part of the wider technical work undertaken

Table 2: Results of Sustainability Appraisal (summary)

Area of search	SA comment	Recommended for shortlisting (potential to accommodate urban extensions)
<b>BAS A</b>	This search area is fairly accessible, with positive scoring for reducing the need to travel and travel options. Land contamination, noise, light, air quality, climate change and flooding all score positively. There are negative impacts concerning landscape and heritage although these have not been scored as significant. On balance this broad area of search should be short-listed for further investigation into the potential for development for urban extensions.	Yes
<b>BAS B</b>	The scoring for this area of search is mainly neutral and positive, with a significant positive for flooding by virtue of the lack of flood risk. There is significant negative scoring for landscape because of the views associated with the area; this would be a long term impact. This negative scoring removes this area as a possibility as an urban extension due to the scale of development and it's potential impacts, however certain parts of the areas may be suitable for small scale development. The appraisal recommends that this broad area of search should <b>not</b> be short-listed for further investigation into the potential for development for urban extensions.	No
<b>BAS C</b>	There are a number of significantly negative scores for this option; these are for health and well being, accessibility, landscape, heritage, the need to travel and travel options. There are positive scores, the most significant being for land contamination and flooding; however the quantity of significant negatives for this area of search by far outweighs the positives. The appraisal recommends that this broad area of search should <b>not</b> be short-listed for further investigation into the potential for development for urban extensions.	No
<b>BAS D</b>	This BAS has scored negatively with regards to landscape, accessibility, health and wellbeing, travel options and economic growth. To a lesser extent, but still a negative scoring, are impacts on previously developed land.	No

	<p>Positive scoring for this search area has come from the lack of flood risk in the area. Overall the significant impacts that have led to the negative scoring for this search area by far outweigh the positive impacts (there are other alternative areas also free from flood risk). This broad area of search should <b>not</b> be short-listed for further investigation into the potential for development for urban extensions.</p>	
<b>BAS E</b>	<p>There are negative scores for a number of sustainability objectives such as health and wellbeing, accessibility, land contamination, and economic growth. Landscape character scored a partly negative score as the area is split into distinct character types with the east being more sensitive to change. The search area scores a significant negative score for reducing the need to travel and travel options. The area scored positively against a number of environmental issues such as noise, light, air quality, climate change and biodiversity. The area scores significantly positive in terms of flood risk. In conclusion, parts of the search area may lend themselves to small scale development, but the inaccessibility and lack of transport options in this search area make this location unsustainable for accommodating an urban extension. The appraisal recommends that this broad area of search should <b>not</b> be short-listed for further investigation into the potential for development for urban extensions.</p>	No
<b>BAS F</b>	<p>This broad area of search has been scored negatively over several SA objectives. Landscape and heritage are significant concerns picked up through the SA, in addition to some concerns regarding biodiversity and flooding. The area has good amenity and recreation value and would impact negatively on the health and well being of the population should this be lost. In comparison to other search areas accessibility is good, although there are areas where accessibility is better (proximity to train station, better bus services). Due to the high level of negative scoring, the SA/SEA is recommending that this broad area of search is <b>not</b> short-listed for further investigation into the potential for development for urban extensions.</p>	No
<b>BAS G</b>	<p>There are few significant negative issues associated with this area of search. One negative point is the accessibility to places of employment – this is slightly less of concern for the northern part of the search area. Positives for this area are for environmental concerns such as land</p>	Yes

	<p>contamination, air quality, light and noise. Positive scoring is also given for accessibility to services and facilities. Recommendations coming from the SA are in relation to travel and health and wellbeing. The accessibility into the countryside is currently poor, and there are limited areas for sport in the area, development could be used to bring positive impacts to the area in this regard.</p> <p>The appraisal recommends that this broad area of search be short-listed for further investigation into the potential for development for urban extensions.</p>	
<b>BAS H</b>	<p>This BAS scored negatively for some SA objectives concerning certain parts of the search area – these scores are in relation to flooding, water quality and quantity, biodiversity, climate change and access to employment opportunities. The appraisal highlights that general accessibility (schools, local centre) is good, although the train station and town centre are some distance. The appraisal recommends that development is avoided in the eastern area to avoid impacts on biodiversity, and that all areas of flood risk are avoided. There are no landscape designations within the search area, however the LTCA highlighted some of the area as medium to high sensitivity, and these areas should be avoided. The appraisal acknowledges that there will be small parts of the search area that are not impacted by any of the aforementioned issues, and these areas may be suitable for limited small scale development, however the areas at risk from impacts from flooding and on biodiversity mean that this search area is unsuitable for an urban extension. The appraisal recommends that this broad area of search should <b>not</b> be short-listed for further investigation into the potential for development for urban extensions.</p>	No
<b>BAS I</b>	<p>This BAS has scored negatively in relation to landscape character, flooding, biodiversity, water quality and quantity, climate change, PDL and health and well being. However, there are some significant positive scores for this search area in relation to accessibility, travel and economic growth. In some ways this location is a sustainable one; however the green space and biodiversity deficit in Redhill are locally significant issues which, in combination with the high sensitivity of the landscape in this area, give more weight to the potential loss of this green space. On balance and compared with the alternative options this broad area of search should <b>not</b> be</p>	No

	short-listed for further investigation into the potential for development for urban extensions.	
<b>BAS J</b>	<p>This BAS only scores negatively for one SA objective – contaminated land. Part of the search area is an active landfill site, which would need to be avoided. There may also be mitigation measures or remediation required in proximity to this site. The area scores positively in terms of accessibility, transport choices and economic growth. The area also scores positively for landscape and historic character, meaning that in comparison to the other search areas development in this area will have lesser impact on this as a sustainability objective. There is also a large amount of PDL in the search area. In light of the limited negative impacts, and numerous positive impacts the appraisal recommends that this broad area of search should be short-listed for further investigation into the potential for development for urban extensions.</p>	Yes
<b>BAS K</b>	<p>It is clear from the scoring of this BAS that development in the north of the search area is not sustainable. The objectives that indicate this are health and wellbeing (amenity value of north bund), flood risk, air quality and noise pollution.. The southern part of the search area has issues with flooding, and with biodiversity. The recommendations from this appraisal are that the north and south of the search area are not allocated for development.</p> <p>The central part of the search area has an opportunity to increase the sustainability of the existing area by the addition of better footpaths and trails, as part of a development brief, to allow connectivity from the bund area (south of M25) to the southern SWT nature reserve. This will increase the appraisal scoring in relation to health and wellbeing, which is a particular issue for this area. Development in this section would also address the regeneration priorities of the council better than alternative search areas in terms of social issues and physical environment. The appraisal recommends the mid-section of the search area be considered for limited small scale development. However the search area as a whole has limiting factors that would not be suitable for a large scale urban extension. The appraisal recommends that this broad area of search should <b>not</b> be short-listed for further investigation into the potential for development for urban extensions.</p>	No

<b>BAS L</b>	<p>This BAS scores negatively for SA objective health and well being due to the potential loss of recreation space and there being no GP or health facilities in walk-able distance. There is limited PDL in the search area. Concern was also raised about accessibility due to the distance the nearest schools and services, although this was balanced with the fact that there is a train station within the search area to give an overall neutral score for accessibility. There are positive scores for air and water quality, flooding, noise and light pollution and biodiversity. The appraisal scored this area with a significant positive score due to the low sensitivity of the landscape and historic environment. Balancing the concerns regarding accessibility to schools and other services with the low impact on the environment it is recommended that this search area lends itself to a large-scale development which would significantly alter the settlement size of Salfords. This would enable the services to come into the area, an additional primary school, and potentially an improvement in train frequency currently serving the settlement, which would all improve the sustainability of the area for existing residents. This scale of development would possibly be outside of the current plan period, and bringing it forward sooner may compromise regeneration and growth priorities elsewhere in the borough, particularly Horley. In order to be truly sustainable this search area would require a large scale development of around 2000 homes. The appraisal recommends that this broad area of search be short-listed for further investigation into the potential for development for urban extensions.</p>	Yes
<b>BAS M</b>	<p>There are generally positive and neutral scores for a number of objectives. Positive scores were given for most environmental objectives such as contaminated land, air, noise and water. Also flooding and proximity to employment and schools scored positively. There are no significant negative scores that are specific to this search area. Recommendations have been put forward to avoid development in the south of the search area, as development here would break up the east-west connectivity for biodiversity. There would also need to be mitigation for any development that would increase run-off into the watercourse. The appraisal recommends that this broad area of search be short-listed for further investigation into the potential for development for urban extensions.</p>	Yes

<b>BAS N</b>	<p>There are positive scores for proximity to employment areas, and for most environmental constraints (water, noise, air quality). Accessibility and health and wellbeing score negatively in the appraisal due to the limited facilities and services within the search area. In order to create a sustainable development in this area (bearing in mind the limited services and facilities, and particularly a school) a large-scale development would be required in order to enable the provision of these factors. There are significant landscape sensitivities to consider, but the search area could potentially improve access to the train station for new and existing development, and the search area is situated on a main transport corridor which is served by the Fastway bus service. The appraisal recommends that this broad area of search be short-listed for further investigation into the potential for development for urban extensions.</p>	Yes
<b>BAS O</b>	<p>This search area has negative scoring for biodiversity and water quality, but more significantly it scores negatively for flooding, both current flood issues, and predicted increases in flooding associated with climate change. The negative scoring indicates that this area is <b>not</b> suitable for an urban extension; however the positive scoring for accessibility indicate that it should not be ruled out for additional smaller scale development, with siting and design taking account of flood risk.</p>	No
<b>BAS P</b>	<p>The appraisal scores negatively for a number of objectives including air quality, noise, light, water quality, and flooding (both current issues and predicted increases in flooding associated with climate change). The area does have excellent accessibility, travel options and potential for low carbon technologies but the flooding and environmental impacts from Gatwick Airport are crucial in balancing the sustainability of this area as a future area for development.</p> <p>The negative scoring indicates that this area is <b>not</b> suitable for an urban extension, however the positive scoring for accessibility indicate that it should not be ruled out for additional smaller scale development, with siting and design taking account of flood risk, noise and air quality.</p>	No
<b>BAS Q</b>	<p>This broad area of search scored negatively against a number of SA objectives, these are: accessibility, biodiversity and economic growth. There were also significant negative impacts identified and these are: PDL,</p>	No

	<p>landscape and transport options and the need to travel. There are some positive sustainability attributes for the search area, and those are around environmental concerns such as air quality, light and noise, and climate change, the area is also at very low risk from flooding. The significant negative scores for travel and accessibility means that on balance the area is <b><u>not</u></b> suitable for an urban extension.</p>	
<b>BAS R</b>	<p>This area scores positively for lack of flood risk, however there are negative scores for a number of sustainability objectives, these are: health and wellbeing, accessibility, PDL, air quality, noise, and biodiversity. There are significant negative scorings against landscape, heritage, economic growth and the need to travel and travel options. It is for these reasons that this broad area of search should <b><u>not</u></b> be short-listed for further investigation into the potential for development for urban extensions.</p>	No
<b>BAS S</b>	<p>The appraisal of this option has highlighted a number of significant negative impacts from designating this search area as an urban extension; these are for biodiversity, landscape and the need to travel and travel options. There are lesser negative scorings for health and wellbeing, PDL, accessibility and economic growth. There are no major environmental concerns such as air quality, noise and light and fluvial flooding is not an issue in the search area. In conclusion, the number of significant negatives against this option requires that the area is <b><u>not</u></b> short-listed for further investigation into the potential for development for urban extensions.</p>	No
<b>BAS T</b>	<p>The appraisal of this search area is reasonably well balanced in the number of positive and negative scorings, with the negative slightly outweighing the positive. The negative impacts from an urban extension on this location area around biodiversity, landscape and poor accessibility. The appraisal scores the area as significantly positive for flood risk, although as an alternative to other search areas that also do not have flood risk; this area has far greater negative implications for general sustainability issues such as reducing the need to travel and transport options. On balance the area is <b><u>not</u></b> suitable for an urban extension.</p>	No

4.2 The recommendations from the SA were fed into the plan making process and used, along with other criteria such as impact on the Green Belt and fit with the overall spatial strategy, to establish a set of preferred broad locations for Urban Extensions.

The results of this process, which is outside of the SA process, but which incorporated the SA findings, can be seen in the table below.

Table 3: Results of SA incorporated into plan making process, showing favoured areas for urban extensions.

	<b>Sustainability Appraisal – Could the area accommodate a strategic urban extension sustainably?</b>	<b>Strategic Green Belt function – How important, overall, is the area of search in terms of Green Belt functions?</b>	<b>Flood risk – To what extent is the area affected by Flood Zone 2/3?</b>	<b>Fit with overall spatial strategy – Does the area of search fit with the overall spatial strategy in the CS?</b>	<b>Conclusion (reason)</b>
A	Yes	Important (preventing sprawl and openness)	None	Yes	Unsuitable for strategic-scale urban extension (ruled out on basis of GB function).
B	No	Important (preventing sprawl and openness)	None	No	Unsuitable for strategic-scale urban extension (ruled out on basis of SA findings, also GB function, and lack of fit with spatial strategy).
C	No	Important (preventing merging and openness)	None	No	Unsuitable for strategic-scale urban extension (ruled out on basis of SA findings, also GB function, and lack of fit with spatial strategy).
D	No	Important (preventing merging and openness)	None	No	Unsuitable for strategic-scale urban extension (ruled out on basis of SA findings, also GB function, and lack of fit with spatial strategy).
E	No	Very important/Important (preventing merging and openness). Less important in part.	None	No	Unsuitable for strategic-scale urban extension (ruled out on basis of SA findings, also GB function, and lack of fit with spatial strategy).
F	No	Very important (historic setting)	Partially affected	Yes	Unsuitable for strategic-scale urban extension (ruled out on basis of SA findings, also GB function).
G	Yes	Less important (openness)	Slightly affected	Yes	Suitable for strategic-scale urban extension

					subject to avoiding areas of flood risk. Prioritise on basis of fit with spatial strategy.
H	No	Important/Less important (preventing merging and openness)	Partially affected	Yes	Unsuitable for strategic-scale urban extension (ruled out on basis of SA findings, also GB function).
I	No	Very important (preventing merging)	Partially affected	Yes	Unsuitable for strategic-scale urban extension (ruled out on basis of SA findings, also GB function).
J	Yes	Less important (preventing merging)	Slightly affected	Yes	Suitable for strategic -scale urban extension. Prioritise on basis of fit with spatial strategy.
K	No	Important/Less important (openness)	Partially affected	Yes	Unsuitable for strategic-scale urban extension however SA identified opportunity in central area. Prioritise on basis of fit with spatial strategy.
L	Yes	Less important (openness)	Slightly affected	No	Suitable for strategic-scale urban extension subject to avoiding areas of flood risk. Longer term option as does not fit with current spatial strategy.
M	Yes	Important/Very important in part (preventing merging and openness)	Slightly affected	No	Unsuitable for strategic -scale urban extension (ruled out on basis of GB functions, also lack of fit with spatial strategy).
N	Yes	Important/Very important in part (preventing merging and openness)	Slightly affected	No	Unsuitable for strategic -scale urban extension (ruled out on basis of GB functions, also lack of fit with spatial strategy).
O	No	Very important in part (preventing merging). Most of area not within GB	Highly affected	Yes	Unsuitable for strategic-scale urban extension (ruled out on basis of SA findings and flood risk). Some limited small scale potential. Location beyond the Green Belt means area should be prioritised.
P	No	Area not within GB	Highly affected	Yes	Unsuitable for strategic-scale urban extension (ruled out on basis of SA findings and flood risk). Some limited small scale potential. Location beyond the Green Belt means area should be prioritised.
Q	No	Important (openness)	None	No	Unsuitable for strategic-scale urban extension

					(ruled out on basis of SA findings, also GB function, and lack of fit with spatial strategy).
R	No	Important (openness and historic setting)	None	No	Unsuitable for strategic-scale urban extension (ruled out on basis of SA findings, also GB function, and lack of fit with spatial strategy).
S	No	Important (preventing merging and openness)	None	Yes	Unsuitable for strategic-scale urban extension (ruled out on basis of SA findings, also GB function).
T	No	Important (preventing merging and openness)	None	No	Unsuitable for strategic-scale urban extension (ruled out on basis of SA findings, also GB function, and lack of fit with spatial strategy).

### 4.3 Cumulative impacts (this part of the SA process was carried out once preferred broad locations had been identified)

- 4.3.1 The most significant cumulative impact of developing strategic urban extensions within G and J as urban extensions is likely to be traffic with secondary impacts such as noise and air quality. Sensitivity to congestion has already been highlighted as an issue in and around these three areas with Woodhatch junction, and general congestion through Redhill and Reigate being highlighted in the Core Strategy transport modelling work. This modelling indicated that some improvements will be required to mitigate against the impacts of background growth and the quantum of development proposed in the Core Strategy, including at specific locations, but that urban extensions (scenario 3) would have minimal additional impacts. The designation of the urban extensions will give certainty to the location of development and allow for transport modelling and improvements to be focussed into the areas that will be affected. A piecemeal spread of housing would not allow for this certainty and consequential road improvements.
- 4.3.2 As detailed options are considered for site allocations further work will be required on transport and traffic.
- 4.3.3 Another cumulative impact could be on school places, particularly secondary places (up to age 18). The Infrastructure Delivery Plan has identified a need for more school places in the future, including the East of Redhill; the timeframes indicate that these will have been delivered before the urban extensions are needed. This will need to be explored further as site allocations progress to ensure sufficient provision into the future.

#### **4.4 Further appraisal requirements**

- 4.4.1 Sustainability appraisal is an iterative process and as such has worked alongside the plan making process, inputting recommendations at each stage. The next stage of the plan making process will come as part of the Development Management Policies DPD. This is the stage where lines will be drawn on maps and the SA can assess options and proposals at a more refined scale, within defined boundaries and at a site specific level. This will allow the SA to put forward recommendations that will enrich the sustainability of future urban extensions by maximising benefits and mitigating adverse impacts.

### **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, including Sustainable Urban Extensions, on economic, social and environmental interests.
- Environment and flooding
  - Avoiding harm to AONB, SAC, SSSI
  - Congestion and accessibility
  - Air quality