# Sustainability Appraisal Report

## ADDENDUM

**Post-hearing amendments**

**July 2013**

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

## 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. Between December 2012 and February 2013, consultation was undertaken on proposed further amendments.

1.2 Hearing sessions for the Core Strategy Examination took place in May 2013, which resulted in some further changes as suggested by the Inspector and the Council. 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 significant 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. Pre-hearing revisions were appraised and reported on in an addendum report dated November 2012. This further addendum report (July 2013) deals with the appraisal of all main changes made during and post hearing.

3.3.3 A full appraisal set out within the appraisal matrices can be seen for those amendments that changed the direction or overall approach to the policy. If it was felt that the amendment clarified the original intent of the policy, then it was judged that this would lead to no *likely significant impact* on the appraisal scoring. The amendment may have also been appraised at an earlier stage in the production of the CS. All amendments have been identified in the results section, and the SA/SEA response given.

## 4. **Summary of 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.

| CS Reference | Change | SA findings |
|---|---|---|
| AGLV paragraphs 5.2.5 and 5.2.6 | New wording giving greater clarity to Council's intentions. | No change to overall approach/ strategy, therefore no change to appraisal scoring. |
| Policy CS1a | New bullet point b. giving greater clarity to Council's intentions. | No change to overall approach/ strategy, therefore no change to appraisal scoring. |
| Policy CS1b: Green Belt | The policy provides clarity on the Council's commitment to protect the GB and the spatial strategy to build in the urban area first. | 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). Cross-referencing to other policies within the CS (CS4, CS8 and CS14) addresses some of the issues raised by |

| | | the SA at the previous stage, for example travel and location of development. |
|---|---|---|
| Policy CS3: Valued people and economic development | Gives greater clarity to Council's intentions. | No change to overall approach/ strategy, therefore no change to appraisal scoring. |
| Policy CS4: Spatial location of development | Removal of specific figures for urban extensions. Reference to policy CS8 removed. | No change to overall approach/ strategy, therefore no change to appraisal scoring – no change to significant likely impacts. |
| Policy CS5: Town and local centres | Addition of text to policy wording. | No change to overall approach/ strategy – this wording contributes what was lost through revocation of the SE Plan. |
| Policy CS6: Area based policies | Area 1 – no change to overall strategy<br>Area 2a - no change to overall strategy<br>Area 2b - no change to overall strategy<br>Area 3 - no change to overall strategy<br>Change to wording in paragraph 6.2.6, paragraph 6.4.4, and changes to policy wording. | No change to SA score – there will be further SA/SEA testing through site allocations (DMP). Allocation of sites will be guided by sustainability criteria from CS8 and policy CS4.<br>No change to overall approach/ strategy, therefore no change to appraisal scoring. Paragraph 6.4.4 referring to suburban areas, particularly in the north-west of area 1, and the potential there for windfall sites being brought forward in accessible residential areas has been appraised at Outstanding Issues (Sep 2011) as a broad location for growth (residential intensification). This broad location was found to be mostly positive when scored against the SA objectives, with some suggested mitigation (flood risk, biodiversity, climate change adaptation and design). |
| CS8: Sustainable development | Addition of reference lost through revocation of SE Plan. | Previous SA/SEA reports (Preferred Options 2008) had highlighted a potential conflict between landscape and heritage assets which this now addresses. |
| CS9: Sustainable construction | Rewording of policy. | Previously there had been conflict identified between provision of affordable housing, market housing and the requirements of this policy. The addition of acknowledgment of feasibility and viability creates more flexibility which will reduce this conflict. There will still need to be further guidance as to how this policy works with more restrictive policies such as heritage and landscape (DMP). |
| CS11: Housing delivery | Redrafted preceding | No change to overall approach/ |

| | paragraphs, new policy wording for bullet point 4. | strategy. Much of the intent of this new wording was previously contained within CS4. |
|---|---|---|
| Policy CS13: Affordable housing | Change of wording to bullet point 3.d. and 4. | No change to overall approach/ strategy. This was the overall strategy as put forward in point 5 of the previously appraised policy. The addition to point 4 introduces flexibility in achieving best quantity and mix of affordable housing relative to individual sites.<br>SA at all stages has advocated a greater amount of affordable housing in line with the SHMA (40%); however the figure in the CS reflects current viability evidence. The peer review carried out in February 2012 led to changes to the supporting text of CS13 to clarify that the Council will seek to maximise affordable housing provision on urban extension sites. |
| Policy CS14: Gypsies, travellers and travelling showpeople | Changes to paragraphs preceding policy. Reference to updated evidence. | Previous appraisal comments have not changed due to the new paragraph wording, however, there is a greater likelihood of the travelling community's needs being met through the increased requirements indicated by the new TAA (2013). |
| Policy CS15: Travel options and accessibility | Addition of bullet d. | No change to overall approach/ strategy – requirement for travel plan was recommended through SA at preferred options (2006)(Option 6). This addition addresses that recommendation. |
| Policy CS16: Implementation and monitoring | New policy | This policy makes clear the council's intentions as previously set out in the implementation section of the CS. The policy gives clear commitment as to how the council intends to bring forward and manage development. The only SA objective that this policy has an impact on is on the provision of housing / employment. |

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 |
| Post Hearing Amendments 2013 | June 2013 |

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 (November 2012). 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

| CS Amendment | SA/SEA response |
|---|---|
| AGLV paragraphs 5.2.5 and 5.2.6 | |
| The review of the qualities of the AGLV landscape undertaken in 2007 recommended that a review of the AONB boundaries should be undertaken but that no areas should be removed from AGLV designation until the case for an amended AONB boundary has been considered. A Landscape Character Assessment and an evaluation of natural beauty is in progress and will inform Natural England's decision as to whether to undertake a review of the boundary. | Gives greater clarity to Council's intentions. No change to overall approach/ strategy. |
| This work will also form the basis on which criteria based policies in the DMP will be prepared and – if appropriate – will inform the identification of new local landscape designations and/or supplementary guidance. In the interim, the AGLV designation will be retained. | Gives greater clarity to Council's intentions. No change to overall approach/ strategy. |
| Policy CS1a | |
| b. All other areas of countryside outside of the AONB, (and the AGLV whilst it remains in force) have their own distinctive landscape character. The landscape character of the countryside outside the current (or revised) AONB boundary  which will be protected and enhanced through criteria based policies in the DMP including, if and where appropriate, new landscape designations. In those areas of countryside allocated for development, policies will be included in the DMP in relation to the design and siting of development to minimise the impact on landscape character. | Gives greater clarity to Council's intentions. No change to overall approach/ strategy. |

## CS1b: Green Belt

This policy was first appraised as an individual policy at the Further Amendments 2012 stage.

**3. In exceptional circumstances land may be removed from the Green Belt and allocated for development through the plan making process. Exceptional circumstances may exist where both (a) and (b) apply:**
**a. There is an overriding need for the development in order to secure the delivery of the strategic objectives and policies of the Core Strategy, and either:**
**(i) The development proposed cannot be accommodated on land within the existing urban area or on land which is in the countryside beyond the Green Belt; or**
**(ii) The development of land within the Green Belt would represent a significantly more sustainable option than (i).**
**b. There is no or limited conflict with the purposes and integrity of the Green Belt.**
**4. The Council will undertake a Green Belt review to inform the DMP and Proposals Map. This review will include:**
**a. Consideration of the purposes of the Green Belt to inform the identification of land for sustainable urban extensions within the broad locations identified in Policy CS4 and revisions to Green Belt boundaries.**
**b. Addressing existing boundary anomalies throughout the borough**
**c. Reviewing washed over villages and areas of land inset within or currently beyond the Green Belt throughout the borough.**
**d. Ensuring clearly defined and readily recognisable boundaries which are likely to be permanent and are capable of enduring beyond the plan period.**
**5. In accordance with (3) and (4) above and the provisions and considerations set out in policies CS4, CS8 and CS14, land required for development will be removed from the Green Belt and allocated through the DMP.**
**6. Land may also be safeguarded through the DMP in order to provide options to meet development needs beyond the plan period. Safeguarded land will only be allocated through a subsequent local plan review and will be subject to Green Belt policy until such 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. | | + | ++ | **No change to previous appraisal scoring** - Point 3 and 5 address potential conflict between protection of the Green Belt, housing supply and supply of G&T sites. |
| 2. To facilitate the improved health and wellbeing of the whole population. | | + | + | The score for this objective at the previous stage was uncertain, however with the policy now referencing policy CS8 some certainty can be given around the green infrastructure network, walking and cycling – thus having a positive impact on this objective. There is also potential that in releasing some GB, UOL and urban greenspace may be protected. |
| 3. To reduce poverty and social exclusion. | | + | + | Cross reference to policy CS8 now incorporates requirement for any GB release to result in development that is socially inclusive. |

| | | | | |
|---|---|---|---|---|
| 4. To minimise the harm from flooding. | | + | + | **No change to previous appraisal scoring** - Point 3a(ii) creates flexibility to avoid land susceptible to flooding |
| 5. To improve accessibility to all services facilities, and natural greenspace. | | + | ? | **No change to previous appraisal scoring** - 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. | | ++ | - | **No change to previous appraisal scoring** - 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. | | + | - | **No change to previous appraisal scoring** - 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. | | ? | | **No change to previous appraisal scoring** - Dependent on location |
| 9. To reduce noise pollution. | | ? | | **No change to previous appraisal scoring** - Dependent on location |
| 10. To reduce light pollution. | | ? | | **No change to previous appraisal scoring** - Dependent on location |
| 11. To improve the water quality of rivers and groundwater, and maintain an adequate supply of water. | | ? | | **No change to previous appraisal scoring** - 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. | + | + | 0 | This scoring is less negative than the previous appraisal due to the reference to policy CS8. Biodiversity networks should be taken into account when allocating land in the GB. Biodiversity should be designed into development, and this may improve the biodiversity value of some areas. |
| 13. To conserve and enhance landscape character and feature, the historic environment and cultural assets and their setting. | + | + | 0 | This scoring is less negative than the previous appraisal due to the reference to policy CS8, particularly point 5 – respecting heritage and the cultural environment. |

| Objective | | | | Commentary |
|---|---|---|---|---|
| 14. To reduce the need to travel, encourage sustainable transport options and make the best use of existing transport infrastructure. | ++ | ++ | ? | The previous appraisal put forward the mitigation "take this objective into account when selecting sites for release" – this has now been addressed through reference to CS4 and CS8. |
| 15. To ensure that the District adapts to the impacts of the changing climate. | | + | ++ | **No change to previous appraisal scoring** - 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 | | 0 | | Not significant impact. |
| 19. To increase energy efficiency and the production of energy from low carbon technologies, renewable sources and decentralised generation systems. | | 0 | | **No change to previous appraisal scoring** - 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. Cross-referencing to other policies within the CS (CS4, CS8 and CS14) addresses some of the issues raised by the SA at the previous stage, for example travel and location of development. The policy gives greater clarity to the Council's intention of protecting the Green Belt, but with mechanisms for release under exceptional circumstances.

**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).
Further Amendments 2012: Creation of individual policy CS1b (selected with changes).


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.

| CS Amendment | SA/SEA response |
|---|---|
| Policy CS3 | |
| 'existing' employment land 'particularly' within town centres… | Gives greater clarity to Council's intentions. No change to overall approach/ strategy. |

| CS Amendment | SA/SEA response |
|---|---|
| Policy CS4 | |
| 1. Development sites will be allocated in the Development Management Policies Document, or through other DPDs, taking account of sustainability consideration including environmental and amenity value, localised constraints and opportunities, the need to secure appropriate | No change to overall approach/ strategy – change clarifies Council's approach of urban areas first and priority locations for growth and regeneration. The reference to approximate housing figures against each of the Urban Extensions may appear to reduce clarity in this respect, but the figures were |

| | |
|---|---|
| infrastructure/service provision, and the policies within this Core Strategy.<br>2. The Council will give priority to the allocation and delivery of land for development in sustainable locations in the urban area, that is:<br>• The priority locations for growth and regeneration:<br>   - Redhill town centre.<br>   - Horley town centre.<br>   - Horley North East and North West sectors.<br>   - Preston regeneration area.<br>   - Merstham regeneration area.<br>   - Other regeneration areas as identified by the Council and its partners.<br>• The built up areas of Redhill, Reigate, Horley and Banstead:<br>• Other sustainable sites in the existing urban area.<br>3. The Council will also allocate land beyond the current urban area for sustainable urban extensions, based on an assessment of the potential within the following broad areas of search (in order of priority):<br>a. Countryside beyond the Green Belt adjoining the urban area of Horley<br>b. East of Redhill and east of Merstham<br>c. South and south west of Reigate<br>Sites beyond the current urban area will be released for development in accordance with CS11 and detailed phasing policies within the DMP. | arbitrary when given prior to further site specific work being carried out on the sustainability of individual sites and the Green Belt review. At this stage the removal of specific figures may mean no change to the figures actually specified for the sites at DMP stage. SA/SEA will be carried out on the site allocations and will consider quantums of development, including cumulative impacts, at that stage.<br>Direct reference has been removed to policy CS8 which provided sustainability criteria to guide release of land for development. This is balanced by the inclusion of sustainability considerations in bullet one of this policy, in addition to general reference to 'other CS policies'. For this reason it is considered that the removal will have no impact at the strategic level. |

| CS Amendment | SA/SEA response |
|---|---|
| Policy CS5 | |
| Addition of 'including culture and tourism'. | No change to overall approach/ strategy – this wording contributes what was lost through revocation of the SE Plan. |

| CS Amendment | SA/SEA response |
|---|---|
| Policy CS6 | |
| Area 1 – no change to overall strategy<br>Area 2a - no change to overall strategy<br>Area 2b - no change to overall strategy<br>Area 3 - no change to overall strategy | No change to overall approach/ strategy – there will be further SA/SEA testing through site allocations (DMP). Allocation of sites will be guided by sustainability criteria from CS8 and policy CS4. |
| Change to wording in paragraph 6.2.6 reference to land East of Salfords as having potential in the longer term. This reference has now been removed, paragraph 6.4.4, | The amendment to paragraph 6.2.6 no change to overall approach/ strategy, therefore no change to appraisal scoring. The reference to land east of Salfords was |

| and changes to policy wording | outside of the plan period. CS1b bullet 6 now refers to safeguarding GB land through DMP for potential needs beyond plan period. Paragraph 6.4.4 referring to suburban areas, particularly in the north-west of area 1, and the potential there for windfall sites being brought forward in accessible residential areas has been appraised at Outstanding Issues (Sep 2011) as a broad location for growth (residential intensification). This broad location was found to be mostly positive when scored against the SA objectives, with some suggested mitigation (flood risk, biodiversity, climate change adaptation and design). Full appraisal matrices for this option can be seen in Appendix F of the submission SA report, and in the Outstanding Issues SA report/ |
|---|---|

| CS Amendment | SA/SEA response |
|---|---|
| Policy CS8 | |
| 7. Minimise the use of natural resources, and contribute to a reduction in carbon emissions, by re-using existing resources, maximising energy efficiency ~~and renewable energy production~~, minimising water use, and reducing the production of waste, including through sustainable construction methods. <u>Encourage renewable energy/fuel production whilst ensuring that adverse impacts are addressed, including on landscape, wildlife, heritage assets and amenity.</u> | No change to overall approach/ strategy – this wording contributes what was lost through revocation of the SE Plan. Previous SA/SEA reports (Preferred Options 2008) had highlighted a potential conflict between landscape and heritage assets which this now addresses. |

## CS9: Sustainable Construction

**1. The Council will expect new development to be constructed to the following standards (taking into account the overall viability of the proposed development at the time the application is made):**
**a. New housing: to a minimum of Code for Sustainable Homes Level 4. To achieve Level 4, the Council may require (through the DMP) or encourage (through supplementary guidance) minimum standards for some tradeable Code elements to be provided in particular locations or for particular types of housing development.**
**b. Relevant non-residential development of new or replacement buildings, or extensions to existing structures: to a minimum of BREEAM 'very good'.**

**2. The Council will work with developers and other partners to encourage and promote the development of decentralised and renewable or low carbon energy (including combined heat and power) as a means to help future development meet zero-carbon standards affordably.**
**a. Where a major development is planned that generates, is within, or is adjacent to an area of significant heat density, it will be expected that the potential to create, or connect to, a district heating network is fully investigated. Such developments will be identified in the DMP where possible.**
**b. Where a district heat network exists or is planned, or where there is potential to utilise waste heat, the Council may require – where feasible and viable - development in these areas to be designed to facilitate its use and connect to it.**

| 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. | + | + | + | Previously there had been conflict identified between provision of affordable housing, market housing and the requirements of this policy. The addition of acknowledgment of feasibility and viability creates more flexibility which will reduce this conflict. |
| 2. To facilitate the improved health and wellbeing of the whole population. | | NA | | |
| 3. To reduce poverty and social exclusion. | | NA | | |
| 4. To minimise the harm from flooding. | | NA | | |
| 5. To improve accessibility to all services facilities, and natural greenspace. | | NA | | |
| 6. To make the best use of previously developed land and existing buildings. | | NA | | |
| 7. To reduce land contamination and safeguard soil quality and quantity. | | NA | | |
| 8. To ensure air quality continues to improve. | + | + | + | The council has made greater commitment to working with partners to achieve this policy objective, which would have the end result of improving air quality if successful. |

| | | | | |
|---|---|---|---|---|
| 9. To reduce noise pollution. | | NA | | |
| 10. To reduce light pollution. | | NA | | |
| 11. To improve the water quality of rivers and groundwater, and maintain an adequate supply of water. | + | + | + | The council has made greater commitment to working with partners to achieve this policy objective, which would have the end result of improving water quality if successful. |
| 12. To conserve and enhance biodiversity and networks of natural habitat. | | NA | | |
| 13. To conserve and enhance landscape character and feature, the historic environment and cultural assets and their setting. | 0 | 0 | 0 | There is still potential for conflict here which will need to be addressed through further guidance either in the DMP or supplementary guidance – however, this is not due to any change made since last appraisal. |
| 14. To reduce the need to travel, encourage sustainable transport options and make the best use of existing transport infrastructure. | | NA | | |
| 15. To ensure that the District adapts to the impacts of the changing climate. | + | + | + | The council has made greater commitment to working with partners to achieve this policy objective, which would have the end result of improving adaptation to the impacts of CC if successful. |
| 16. Provide for employment opportunities to meet the needs of the local economy | | NA | | |
| 17. Support economic growth which is inclusive, innovative and sustainable | | NA | | |
| 18. To achieve sustainable production and use of resources | + | + | + | The council has made greater commitment to working with partners to achieve this policy objective, which would have the end result of increasing sustainable use of resources if successful. |
| 19. To increase energy efficiency and the production of energy from low carbon technologies, renewable sources and decentralised generation systems. | + | + | ++ | The council has made greater commitment to working with partners to achieve this policy objective, which would have the end result of increasing low carbon energy generation if successful – this will increase over time. |

**Summary:**

The main changes in this policy since submission are additional clarity as to what the council's intentions are from the application of this policy. The strategy remains the same but the flexibility given through consideration of viability and feasibility reduces the conflict between provision of homes (including affordable) and the application of this policy. The greater commitment given through this policy by the council to working with developers and partners gives greater possibility of the overall aims and strategy being achieved. Should this be the case then a great number of sustainability benefits will be achieved. There will still need to be further guidance as to how this policy works with more restrictive policies such as heritage and landscape (DMP).

**Previous appraisal and alternatives**

Alternative versions of this policy were appraised at Issues and Options (2005) and again at Preferred Options (2008). At PO stage it was suggested that high density development could be used as an option to overcome viability constraints. At Submission (2009) conflicts were identified between certain restrictive policies (such as AONB, heritage) and potential outcomes of this policy. It was suggested that further guidance address this. The wording was changed significantly at Submission (2012) stage and appraisal (Peer review Feb 2012) had highlighted that the policy was unclear as to what the intentions were. The wording now is clearer, and gives more commitment from the council to working with partners to bring forward zero carbon developments.

| CS Amendment | SA/SEA response |
|---|---|
| Policy CS11: Housing Delivery | |
| **Redrafted preceding paragraphs**<br><br>**4. Sites allocated for urban extensions will be released when such action is necessary to maintain a five year supply of specific deliverable sites (based on the residual annual housing requirement). The phasing of urban extension sites will be set out in the DMP and will take account of strategic infrastructure requirements.** | No change to overall approach/ strategy. Much of the intent of this new wording was previously contained within CS4. |
| CS Amendment | SA/SEA response |
| Policy CS13: Affordable Housing | |
| **d. In some regeneration areas an alternative level of affordable housing provision may be sought to achieve a more balanced community and deliver other regeneration initiatives.**<br><br>**4. On sites being redeveloped where there is existing affordable housing (or sites where the most recent use has been affordable housing), as a minimum the same number of affordable homes should** | No change to overall approach/ strategy. This was the overall strategy as put forward in point 5 of the previously appraised policy. The addition to point 4 introduces flexibility in achieving best quantity and mix of affordable housing relative to individual sites. SA at all stages has advocated a greater amount of affordable housing in line with the SHMA (40%); however the figure in the CS reflects current viability evidence. The peer review carried out in February 2012 led to |

| | |
|---|---|
| **be re-provided, and be consistent with current mix and tenure requirements <u>unless agreed otherwise with the Council.</u>** | changes to the supporting text of CS13 to clarify that the Council will seek to maximise affordable housing provision on urban extension sites. |

**Policy CS14: Gypsies, Travellers and Travelling Showpeople**

**New paragraphs:**

7.7.1 The Council will seek to ensure that sufficient sites are made available to meet the accommodation needs of Gypsies, Travellers and Travelling Showpeople. In identifying their needs, reference will be made to the latest Traveller Accommodation Assessment (2013). This identifies a need for 52 pitches for Gypsies and Travellers and 13 plots for Travelling Showpeople over the next 15 years.

7.7.2 A target for pitches and plots will be included within the DMP. In determining the target figure, opportunities to allocate sites sufficient to meet the identified need within the urban area and countryside beyond the Green Belt will be given priority.

7.7.3 However it is probable - given the need to ensure that sites are suitable, affordable and deliverable, and some of the environmental constraints that exist in these areas - that there will be a need to consider some limited alterations to Green Belt boundaries to accommodate Gypsy, Traveller and Travelling Showpeople sites. Exceptional circumstances will need to be demonstrated if land is to be taken out of the Green Belt to accommodate sites.

7.7.4 Whilst the Council is committed to meeting the identified level of need as far as possible, it is not able to conclude at this Core Strategy stage whether sites can be allocated to meet the full need without compromising the purposes or integrity of the Green Belt. The final target will therefore need to be informed not only by capacity within urban areas and countryside beyond the Green Belt, but also by the findings of the detailed Green Belt review (see policy CS1b).

7.7.5 As well as identifying pitch and plot targets, the DMP will also allocate the sites needed to provide a five year supply of specific and deliverable sites and broad locations for growth in years six to ten (based on the final targets).

7.7.6 This Core Strategy policy sets out the criteria which will be used to identify sites and to determine planning applications relating to sites not allocated in the DMP.

| SA Objective | Assessment | | | Comments\Proposed Mitigation |
|---|---|---|---|---|
| | Short Term | Medium Term | Long Term | |
| 1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford. | 0 | + | ++ | 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. | | ++ | | **No change from previous appraisal scoring**: Integration and co-existence considered. Access to healthcare and schools. |
| 3. To reduce poverty and social exclusion. | | + | | **No change from previous appraisal scoring** |
| 4. To minimise the harm from flooding. | | ++ | | **No change from previous appraisal scoring**: Flood risk considered. |
| 5. To improve accessibility to all services facilities, and natural greenspace. | | + | | **No change from previous appraisal scoring**: 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. | | + | | **No change from previous appraisal scoring**: 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:**

This policy was appraised as a further amendment to the Core Strategy in 2012. The policy wording was broadly the same at that point but the policy relied on the evidence of need at that time which was the East Surrey TAA (2007). This gave a target of 57 pitches (G&T) and 9 plots (TS), across East Surrey. The following findings were reported: '*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'.* These comments have not changed due to the new paragraph wording, however, there is a greater likelihood of the travelling community's needs being met through the increased requirements indicated by the new TAA (2013)

**<u>Previous appraisal and alternatives</u>**

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).

| CS Amendment | SA/SEA response |
|---|---|
| Policy CS15 Travel options and accessibility | |
| Addition of bullet d:<br>'Requiring the provision of travel plans for proposals which are likely to generate significant amounts of movement' | No change to overall approach/ strategy – requirement for travel plan was recommended through SA at preferred options (2006)(Option 6). This addition addresses that recommendation. |

| CS16: New policy |
|---|

**1. Progress towards the development targets set out in the Core Strategy and the delivery of allocated sites will be regularly monitored and reviewed by the Council.**
**2. To secure the timely delivery of development and infrastructure, a range of management actions and/or contingency measures will be used as part of the on-going monitoring and review process. The Council will work with landowners and developers proactively to facilitate the delivery of all allocated development sites and other sustainable development opportunities.**
**Measures may include:**
- **The use of Council's land interests to act as a catalyst for development**
- **Negotiation on particular sites to overcome specific economic viability issues**
- **Using planning powers such as compulsory purchase orders or local development orders**
- **Facilitating land assembly by assisting with the relocation of existing users**
- **Preparing masterplans or development briefs**

**Exploring alternative funding mechanisms and/or the potential for enabling development.**

| SA Objective | Assessment | | | Comments\Proposed Mitigation |
|---|---|---|---|---|
| | Short Term | Medium Term | Long Term | |
| 1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford. | + | + | + | |
| 2. To facilitate the improved health and wellbeing of the whole population. | | NA | | |
| 3. To reduce poverty and social exclusion. | | NA | | |
| 4. To minimise the harm from flooding. | | NA | | |
| 5. To improve accessibility to all services facilities, and natural greenspace. | | NA | | |
| 6. To make the best use of previously developed land and existing buildings. | | NA | | |
| 7. To reduce land contamination and safeguard soil quality and quantity. | | NA | | |
| 8. To ensure air quality continues to improve. | | NA | | |
| 9. To reduce noise pollution. | | NA | | |
| 10. To reduce light pollution. | | NA | | |
| 11. To improve the water quality of rivers and groundwater, and maintain an adequate supply of water. | | NA | | |
| 12. To conserve and enhance biodiversity and networks of natural habitat. | | NA | | |
| 13. To conserve and enhance landscape character and feature, the historic environment and cultural assets and their setting. | | NA | | |

| | | | | |
|---|---|---|---|---|
| 14. To reduce the need to travel, encourage sustainable transport options and make the best use of existing transport infrastructure. | | NA | | |
| 15. To ensure that the District adapts to the impacts of the changing climate. | | NA | | |
| 16. Provide for employment opportunities to meet the needs of the local economy | + | + | + | |
| 17. Support economic growth which is inclusive, innovative and sustainable | | NA | | |
| 18. To achieve sustainable production and use of resources | | NA | | |
| 19. To increase energy efficiency and the production of energy from low carbon technologies, renewable sources and decentralised generation systems. | | NA | | |

**Summary:**

**This policy makes clear the council's intentions as previously set out in the implementation section of the CS. The policy gives clear commitment as to how the council intends to bring forward and manage development. The only SA objective that this policy has an impact on is on the provision of housing and employment.**

**Previous appraisal and alternatives**

At Preferred Options (2008) Policy option 3 'Plan, Monitor, Manage' was appraised. The wording of the policy option was '*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'*.

Appraisal has identified strong sustainability attributes and that adverse impacts are unlikely. Of particular importance, a policy of matching housing delivery to the adequacy of infrastructure and services would support the delivery of homes and communities that meet people's needs in terms of equality of access to services. It is assumed that accessibility to transport would be improved and that, in combination with a policy of developing in the most accessible areas, that the need to travel by private car would be reduced, to the benefit of limiting emission of greenhouse gases and improving air quality. Adequate infrastructure provides the basis for sustainable economic growth, but a specific reference to communications infrastructure would ensure the policy supported 'smart growth'. The policy wording could emphasise how the infrastructure provided could be more in line with 'sustainable living' and give a greater indication of how adaptation to climate change could be incorporated. This could include energy efficiency, renewable energy infrastructure and the management of water would in accordance with the principles of SuDS.

# Sustainability Appraisal Report

## ADDENDUM

## Appendix A

## Table showing alternatives and reasons for selection / rejection

## July 2013

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

| 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:<br>• Nationally protected areas including Areas of Outstanding Natural Beauty (AONB), Sites of Special Scientific Interest and Special Area of Conservation;<br>• Metropolitan Green Belt;<br>• Sites of Nature Conservation Importance (SNCIs) and Local Nature Reserves;<br>• Water Courses, and flood plains, which may contain important habitats.<br>• Biodiversity of wildlife species and habitats, including locally significant features such as ponds and veteran trees, - Ancient Woodland, Protected Trees;<br>• Urban Open Land; and<br>• 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<br>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. *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 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. | | | |
| *Do not* 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. |
| *Do not* relax the Council's current policy on the protection of employment land whilst seeking to retain identified key strategic sites and sites in town centres (accepting that mixed use redevelopment may be acceptable on town centre sites)? | 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 |

| | | | |
|---|---|---|---|
| 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 | | | 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. |
| Preferred Policy Approach 12 Strategic Location of Housing | PO 2008 | As preferred option 1 | 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. |
| Policy CS5 (now amalgamated with policy CS4) but with Sustainable urban extensions removed. | Schedule A&B | Option with urban extensions (rejected) at the time due to SHLAA evidence. Without SUE (selected) | 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. |
| References to sustainable urban extensions (SUE) reinstated. | Outstanding issues | With urban extensions (selected) due to updated SHLAA evidence. Without SUEs (rejected) | Due to SHLAA revisions it was necessary to include potential for urban extensions for future growth. SA gave recommendations regarding scale of |

| | | | 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 |

| | | | 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. |
|---|---|---|---|
| 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. |

| | | | |
|---|---|---|---|
| revitalising Redhill Town Centre, building on the existing theatre and on the medium scale of the town centre and its pedestrian qualities. | | | |
| 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. | I&O 2005 | Redhill options carried into RAAP process | Wider social benefits for option below. |
| 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. | 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. |
| Focussed regeneration (F2a). No focus on regeneration (F2b) | I&O 2005 | Focussed regeneration (selected), No focus on regeneration (rejected) | A focussed approach could target areas of deprivation. |
| Option 17 'regional, local and town centres' | Preferred Options 2006 | Selected | Regeneration could deliver social, economic and environmental benefits and that a focussed approach could target areas of deprivation. |
| Option 18 'regeneration' | 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. |
| Policy restructured and updated to reflect latest evidence on housing, employment and retail. | Outstanding Issues | Figures changed to reflect latest evidence on housing, employment and retail (selected), leave policy unchanged (rejected) | See CS4 (strategic locations for growth) |
| Figures updated | 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. |
| *Do not* 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. |
| *Do not* 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 |
| *Do not* 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. |
| *Do not* 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. |
| *Do not* 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 |

| | | | |
|---|---|---|---|
| developments comprising 15 dwellings or more to provide at least 35 per cent of housing as affordable; and<br>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. | | | 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. |
| H5. Set out an appropriate mix of affordable housing to be provided as social rented, affordable home ownership and / or intermediate rented accommodation. | PO 2006 | Taken forward to PO 2008 | As H4 above |
| Preferred Policy Approach 15 Affordable housing 15 dwellings or more to provide at least 40 per cent of housing as affordable; | PO 2008 | Carried forward to Submission 2009 (rejected) | 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. |
| 30% affordable housing on sites of 15 or more | Submission 2012 | 30% AH (selected) due to viability testing, 40% - as submission 2009 (rejected) | SA recommended increasing AH provision on SUE to make up shortfall. Change made to supporting text of CS13 to do this. |

| CS14 Gypsies, Travellers and Travelling Showpeople | | | |
|---|---|---|---|
| **Alternatives considered** | **Stage of preparation** | **Reasons for carrying forward / rejecting** | **SA/SEA conflicts** |

| Alternatives considered | Stage of preparation | Reasons for carrying forward / rejecting | SA/SEA conflicts |
|---|---|---|---|
| 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;<br>Expand the cycle network in the Borough;<br>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<br>Link public transport improvements to town and village centre parking strategies. | | | |
| T4. Include policies that ensure development proposals:<br>Are capable of being served by safe and convenient access to the highway network and public transport;<br>Do not give rise to traffic volumes that exceed the capacity of the local or strategic highway network;<br>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;<br>Be accompanied by a transport assessment, or transport statement depending on upon the size of the scheme and its potential impact;<br>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<br>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 Policy Approach 19 Accessibility | 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. |