



# **Development Management Plan (Regulation 19)**

## **Habitats Regulations Assessment**

**January 2018**

*Note that this paper is currently under advice from Natural England. Comments have been received from Natural England, taking into account recent national case law, which will require a supplement to this HRA, and this is currently under preparation – See Annex 6 for comments from Natural England.*

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# 1. Introduction

## The requirement to undertake Habitats Regulations Assessment

- 1.1 The European Directive (92/43/EEC) on the Conservation of Natural Habitats and Wild Flora and Fauna (the ‘Habitats Directive’) sets out the means to protect habitats and species of European importance through the establishment and conservation of a network of sites known as ‘Natura 2000’ sites<sup>1</sup>. These are sites of exceptional importance in respect of rare, endangered or vulnerable natural habitats and species within the European Community. Habitats Regulations Assessment (HRA) is required of land use plans under the Habitats Directive, as transposed into UK law by the Conservation of Habitats and Species Regulations 2010 (The Habitats Regulations 2010)<sup>2</sup>.
- 1.2 The purpose of the HRA is to assess the implications of a plan, either individually, or in combination with other plans or projects, on these Natura 2000 Sites. The Habitats Directive applies the precautionary principle to Natura 2000 sites. In normal circumstances, a land use plan can be brought into effect only after having ascertained that it will not adversely affect the integrity of a Natura 2000 site.

## What does this report do?

- 1.3 Reigate & Banstead Borough Council is currently preparing its Development Management Plan (DMP), part 2 of its updated Local Plan. Part 1 of the Local Plan, the Core Strategy, was adopted in July 2014 and includes policies that define the overall the overall scale and location of growth in the borough until 2027. The DMP will provide the detailed policies and site allocations to deliver the Core Strategy. The DMP will be accompanied by a Policies Map, showing designations and development allocations.
- 1.4 This report seeks to determine whether the draft DMP prepared for Regulation 19 consultation and submission to the Secretary of State for examination – and policies and proposed development site allocations within it – will have any significant adverse impacts on protected European habitats or species, either alone or in combination with other plans or proposals.

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<sup>1</sup> Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites

<sup>2</sup> The Conservation of Habitats and Species Regulations (Habitats Regulations) 2010 updates the Conservation (Natural Habitats etc) Regulations 1994 (as amended).

## 2. Methodology

2.1 European guidance on HRA recommends a process of up to four stages. These are summarised in Figure 1.

**Figure 1: Stages in HRA**

Stage	Summary
Stage 1a	Screening Stage - Determining whether the plan directly connected with or necessary to the management of that European site. If it is not, determining whether the plan in itself or 'in combination' with others is likely to have a significant effect on a European site. If the answer is 'yes' then the adverse effects on the integrity of each European site must be considered via 'Appropriate Assessment' at Stage 2 below.
Stage 2	Appropriate Assessment - Determining whether, in view of the site's conservation objectives, the plan in itself or 'in combination' would have an adverse effect (or risk of this) on the integrity of the site. If not, the plan can proceed.
Stage 3	Assessment of alternative solutions - Where it is assessed that there may be an adverse impact (or risk of this) on the integrity of the site, there should be an examination of the alternatives.
Stage 4	Assessment where no alternative solutions remain and where adverse impacts remain.

2.2 The plan-making authority (the Council) is required to consult the appropriate nature conservation body (Natural England) in carrying out an HRA Assessment, as well as the general public and/or stakeholders as appropriate.

### Structure of this report

2.3 The rest of this report is structured as follows:

- a. Section 3: The Core Strategy: summarises the findings of the Core Strategy HRA.
- b. Section 4: The draft Development Management Plan: summarises the content of the draft DMP which is the subject of this report
- c. Section 5: HRA Screening Assessment: summarises the outcome of the draft DMP screening assessment
- d. Section 6: Next Steps: sets out the next steps for the Council.

## 3. The Core Strategy

3.1 The Development Management Plan that is now being prepared by the Council follows on from the Core Strategy, adopted in 2014. The purpose of the Development Management Plan is to deliver the Core Strategy. The policies and site allocations that are made through the DMP will therefore broadly align with the policies and overall spatial strategy set out in the Core Strategy. For that reason, the findings of the Core Strategy HRA Screening Assessment are relevant to this DMP HRA Screening Assessment. The potential impacts identified have been used to inform the screening of DMP draft policies and site allocations.

3.2 The levels of growth proposed in the Core Strategy are set out in Figure 2.

**Figure 2: The levels of growth proposed in the Core Strategy**

Topic	Plan/proposal	Notes
Housing scale	6,900 homes between 2012 and 2027 (460dpa)	Alternative scales of housing growth tested at earlier stages of plan formulation
Housing location	Urban sites Area 1: 930 homes Area 2a: 1330 homes Area 2b: 280 homes Area 3: 2440 homes	Plan looks sequentially to urban sites first. Urban provision in Horley includes 2 new neighbourhoods
	Sustainable Urban Extensions Around Horley: 200 homes East Redhill/Merstham: 500-700 homes South/South West Reigate: 500-700 homes	Monitoring targets and triggers will ensure land only released for sustainable urban extensions if insufficient urban land supply. Areas of land within proximity of the Mole Gap to Reigate Escarpment screened out
Employment scale and location*	Approx 46,000sqm	Focus on accommodating additional floorspace in town centres and existing industrial estates. Includes 7,000sqm in Redhill town centre.
Retail scale and location*	25,800sqm comparison floorspace 11,700sqm convenience floorspace	Majority of retail growth focused in Redhill Town Centre, with more limited growth in other centres to retain a constant market share.
Major infrastructure	Gatwick Airport	Proximity to Airport means good national/international transport links, but also brings problems such as traffic congestion, noise and air pollution that need to be managed.

\* subject to regular monitoring of demand levels

3.3 The potential impacts of the Core Strategy on Natura 2000 sites, identified through the Core Strategy HRA process, are summarised in

3.4 Figure 3.

**Figure 3: Key potential impacts of the Core Strategy on Natura 2000 sites**

Natura 2000 site	Potential impacts	Potentially arising from:
Mole Gap to Reigate Escarpment SAC	Potential impacts on habitat due to increased recreational usage	Core Strategy and in-combination with other plans
	Potential impact on habitat due to maintenance (and risk of cessation) of grazing	In-combination with other plans
	Potential impact on habitat due to increased air pollution	Core Strategy and in-combination effects. (NB this is a regional issue)
	Potential disturbance to roosting populations of Bechstein's bats, a European Protected Species	In combination with other plans.
Ashdown Forest SAC and SPA	Potential impact on nationally important bird populations due to increased recreational usage	Core Strategy and in combination with other plans (R&B effects likely to be very limited)
	Potential air pollution	Core Strategy and in combination with other plans (R&B effects likely to be very limited)
Protection of European Protected Species outside European designated Site Boundaries	Potential disturbance to roosting populations of Bechstein's bats, a European Protected Species (section 2.4.7)	In combination with other plans.

3.5 Recreational usage: Recreation activities and human presence can have an adverse impact on the integrity of a Natura 2000 site as a result of erosion, trampling or general disturbance. The Core Strategy HRA Screening Assessment concluded that, in principle, new housing proposed in the borough could result in an increase in visitors to the Mole Gap to Reigate Escarpment SAC, and – potentially – the Ashdown Forest SAC and SPA.

3.6 The Core Strategy Appropriate Assessment stage concluded that, for the Mole Gap to Reigate Escarpment SAC, recreational pressure created by the proposals in the Core Strategy in combination with other plans/projects would be minimal in relation to the large number of visitors who come from outside the borough. The implementation of avoidance measures should result in no adverse impact on the integrity of the SAC. The avoidance measures proposed were:

- a. Positive visitor management and access management
- b. Site management around honeypot sites
- c. Encouraging visitors to alternative sites in the vicinity of the SAC
- d. Provision of new open space as part of new developments and/or enhancement of existing alternative recreation sites, including via a new Green Infrastructure Strategy
- e. HRA assessments of projects, as required by Policy CS2 of the Core Strategy, and developer contributions as appropriate

3.7 The Core Strategy Appropriate Assessment stage concluded that, in relation to the Ashdown Forest SAC and SPA, recreational pressure created by the Core Strategy was highly unlikely to cause recreational disturbance at this site, and

that the Core Strategy would therefore not have any adverse impact in this regard.

- 3.8 Maintenance (and risk of cessation) of grazing: Maintenance of a sympathetic grazing regime is key to the continued presence of chalk grassland, which is an important feature of the Mole Gap to Reigate Escarpment SAC. Grazing suppresses the growth of more competitive plant species and encourages a more diverse selection of plants compared to mowing.
- 3.9 The Core Strategy Screening Assessment concluded that the maintenance of grazing could be threatened by an increase in public objection to stock fencing, possible disturbance to grazing animals due to increased visitor numbers and competition for financial resources for grazing and stock fencing.
- 3.10 The Core Strategy Appropriate Assessment stage concluded that, with proposed avoidance measures, the Core Strategy would not have an adverse effect on grazing within the SAC. Avoidance measures were identified as:
- a. Improved interpretation and continued joint working in relation to visitor management methods
  - b. Improved visitor facilities in conjunction with grazing infrastructure
  - c. Provision of new local open space as part of new developments and/or enhancement of existing alternative recreation sites.
- 3.11 Air pollution: Air pollution is most likely to directly affect plant, soil or water habitats, however may affect fauna indirectly as a result of a deterioration in habitat. Deposition of pollutants to the ground can result in acidification (a consequence of which is a change in the vegetation that soils can support), eutrophication (which can cause competitive paly species to dominate over slower growing and rarer species) and ozone exposure (which can directly damage plants, reducing growth rates and increasing vulnerability to water stress).
- 3.12 The Core Strategy HRA Screening Assessment identified that air pollution generated by increases in vehicle movements may contribute to eutrophication and/or ozone exposure, potentially impacting both the Mole Gap to Reigate Escarpment SAC and the Ashdown Forest SAC and SPA.
- 3.13 In relation to the Ashdown Forest SAC and SPA, the Core Strategy Appropriate Assessment concluded that additional air pollution created by the proposals contained in the Core Strategy would not have an adverse impact on the integrity of the SAC and SPA<sup>3</sup>.
- 3.14 In relation to the Mole Gap to Reigate Escarpment SAC, the Core Strategy Appropriate Assessment concluded that additional air pollution created by the proposals in the Core Strategy would be minimal. The Core Strategy would not therefore have an impact on the SAC in this way. It also noted that the Council would assess significant localised effects at a more local level, for example in relation to site allocations (an aspect of the DMP).

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<sup>3</sup> Note that this assessment was carried out prior to *Wealden District Council v Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority [2017] EWHC351 (Admin)*



- 3.15 Disturbance to roosting populations of Bechstein's bats: The Bechstein's Bat is a European Protected Species. The bats require foraging areas within 3.5km of their roosts, which may be outside of the directly protected Natural 2000 habitat.
- 3.16 The Core Strategy Screening Assessment identified that the Mole Valley to Reigate Escarpment SAC supports a population of Bechstein's bats. It notes that it has been suggested that there are areas outside of the SAC that are of importance as foraging and roosting sites, and that the loss of trees and habitats through development may be damaging to, or result in severance of, bats' flight lines between the SAC and surrounding foraging/roosting areas. It also notes the potential impacts of climate change and wider urbanising effects on this protected species.
- 3.17 The Core Strategy Appropriate Assessment concludes that policies contained in the Core Strategy should result in a net gain in biodiversity and not result in harm to these bats (or other species). In particular it notes that through policies on biodiversity, design and landscaping, mature trees, woodlands, and hedgerows can be maintained, and that measures to manage recreational impact can also be used to limit urbanising effects.

## 4. The draft Development Management Plan

- 4.1 As noted above, the DMP will deliver, broadly, the scale of growth included in the Core Strategy, in accordance with the spatial strategy the Core Strategy sets out.
- 4.2 The draft Development Management Plan has been prepared by the Council taking into account local evidence and the outcomes of the Regulation 18 consultation held in late 2016. The draft DMP will be subject to further 'Regulation 19' consultation, and examination by an independent planning inspector, before it is adopted by the Council. The draft DMP is accompanied by a Policies Map.
- 4.3 The draft DMP and the supporting Policies Map include the following main aspects:
- Policies to guide decision making on planning applications
  - Designation boundaries, within which particular policy approaches will be applied
  - Development allocations for housing, employment, retail and mixed use development
  - Areas of 'safeguarded land' which will be considered for development in the next plan period through a review of the Local Plan.
- 4.4 The content of the DMP is guided by the proposed objectives set out in Figure 4.

**Figure 4: Proposed DMP objectives**

PE1: Safeguard existing employment land and premises to ensure that there is adequate space for businesses to locate in the borough.
PE2: Provide flexibility for local businesses to start up, grow, diversify and prosper.
PE3: Help new development to deliver jobs and skills benefits for local people
PE4: Protect the vitality and viability of our town centre shopping areas
PE5: Protect the viability of smaller scale but vital local shopping areas
PE6: Ensure that both town and local centres are resilient and able to respond to future changes
SC1: To ensure that new development makes the best use of land whilst also being well designed and protecting and enhancing local character and distinctiveness
SC2: To ensure an appropriate mix of housing types and sizes, offering a good standard of living to future occupants
SC3: To minimise the impacts of development, and the development process, on local residents and local amenity
SC4: Protect the most valuable open space within the urban areas
SC5: Encourage the provision of open space as part of new developments, and where appropriate new outdoor sport and recreation provision.
SC6: Require new developments to provide adequate parking, whilst recognising the need to encourage sustainable transport choices, particularly in the most accessible locations
SC7: Ensure new developments are served by safe and well designed access for vehicles, pedestrians and cyclists
SC8: Encourage new development to incorporate passive and active energy measures and climate change resilience measures and renewable energy technologies

SC9: Direct development away from areas at risk of flooding, and ensure all developments are safe from flood risk and do not increase flood risk elsewhere or result in a reduction in water quality
SC10: Ensure new development protects, and enhances wherever possible, the borough's landscapes and biodiversity interest features, providing the highest degree of protection to internationally and nationally designated areas.
SC11: Maximise the contribution of new development to a comprehensive green infrastructure network across the borough.
SC12: Control development in the Green Belt to safeguard its openness, and where possible enhance its beneficial use.
SC13: Conserve and enhance designated heritage assets across the borough, supporting their continuing viable use and cultural benefits.
PS1: Identify a local target for gypsy, traveller and travelling showpeople sites, and allocate sites to achieve this target.
PS2: Ensure future cemetery and/or crematorium provision is located consistent with sustainability principles
PS3: Allocate sites for development across the borough consistent with the Core Strategy and sustainability principles
PS4: Plan for improvements to existing infrastructure and services, and/or the provision of new infrastructure and services, to meet the needs created by new development.

4.5 The DMP focuses on the development and use of land. As such, the content of the DMP could, in theory, have the following potential impacts on European sites:

- a. Physical loss of habitat: development on habitat within the SAC or habitat around the SAC that supports foraging of protected species
- b. Habitat degradation or damage, for example from erosion, trampling (recreational pressure), habitat fragmentation or severance, urbanisation impacts (such as burning, tipping, introduction of invasive species)
- c. Cessation of appropriate management measures (eg grazing) due to conflict with eg recreation
- d. Contamination resulting in habitat degradation or damage – for example soil contamination, waterbody or groundwater contamination or air pollution
- e. Water: reduction in water table/water levels resulting from water abstraction, or flooding resulting from increased runoff.

## 5. Stage 1: Screening Assessment

### Introduction

- 5.1 The purpose of the Screening Assessment stage is to identify whether the plan or project (plan, in this case) is likely to have a significant effect on any Natura 2000 sites, either alone or in combination with other plans or projects. If a likely significant effect is identified, an Appropriate Assessment must then be undertaken into the implications of the plan or project in view of the relevant Natura 2000 site's conservation objectives (Stage 2 of the process as set out in Figure 1 above).
- 5.2 Interpretation of 'likely significant effect': Case law<sup>4</sup> provides interpretation of the term 'likely significant effect'
- An effect should be considered 'likely' if it cannot be excluded, on the basis of objective information, that it will have a significant effect on the site
  - An effect should be considered 'significant', if it undermines the conservation objectives of the site; and
  - Where a plan or project has an effect on a site but is not likely to undermine its conservation objectives, it cannot be considered likely to have a significant effect on the site concerned.

### Is the plan directly connected with or necessary to the management of a European site?

- 5.3 The DMP is not directly connected with or necessary to the management of a European site. A Screening Assessment is therefore required.

### Identification of Natura 2000 sites which may be affected by the DMP

- 5.4 This stage seeks to identify Natura 2000 sites within or in proximity to Reigate & Banstead Borough which may be affected by the DMP.

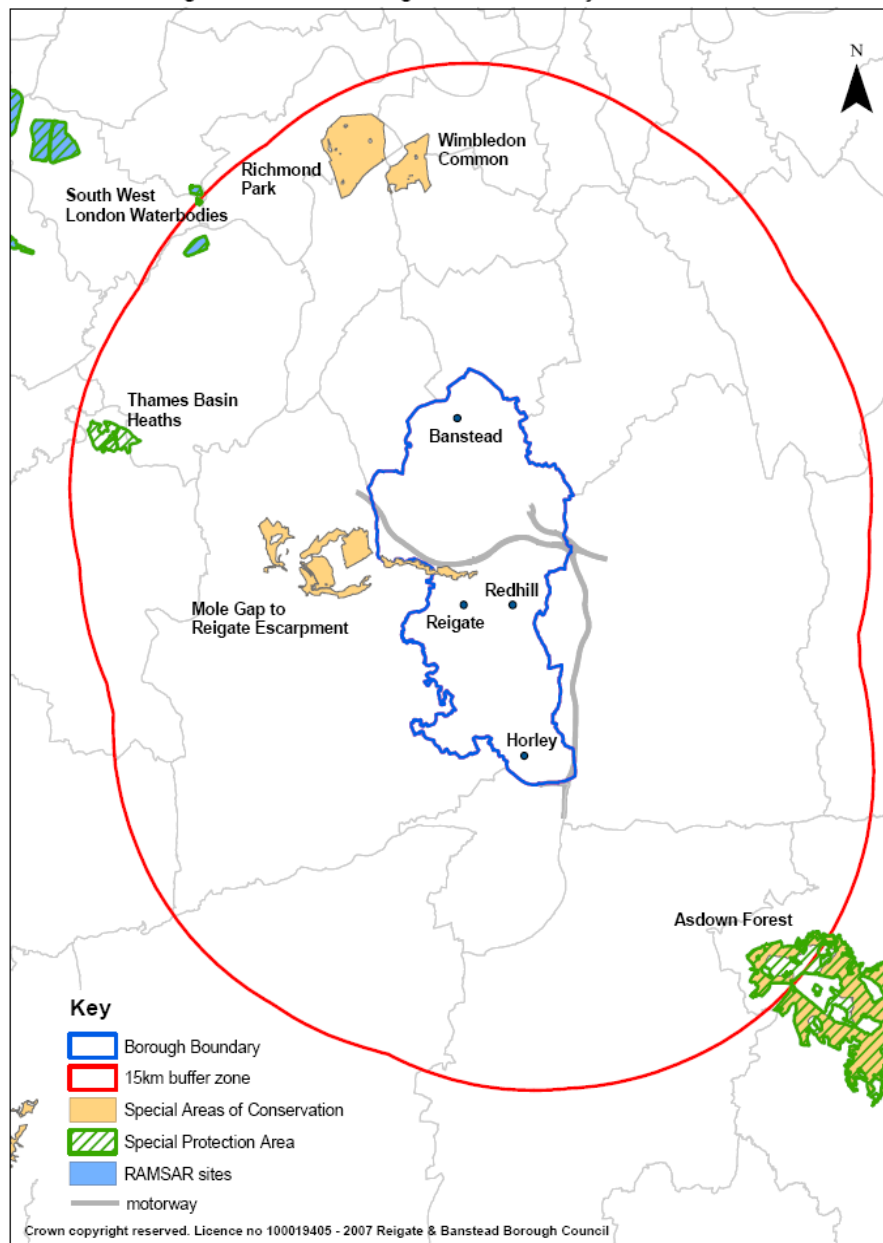
5.5

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<sup>4</sup> ECJ Case C-127/02 "Waddenzee", 2004

5.6 Figure 5 indicates all Natura 2000 sites within 15km of the Reigate & Banstead borough boundary. Further information about these sites is provided in Annex 1.

**Figure 5: Natura 2000 sites falling within 15km of Reigate & Banstead**



5.7 As noted above, the proposed policies and allocations in the draft DMP are broadly consistent with the overall spatial strategy and level of growth set out in the adopted Core Strategy. The Core Strategy Appropriate Assessment concluded that – of the sites identified in

- 5.8 Figure 5 - the Core Strategy could potentially have an impact on the Mole Gap to Reigate Escarpment SAC.
- 5.9 The sensitivity to the Ashdown Forest SAC to air quality has been highlighted through the recent successful legal challenge by Wealden District Council in relation to the Lewes Joint Core Strategy. The decision in relation to this case highlighted the importance of robust 'in-combination' assessments to ascertain likely significant affect. On the basis that the draft DMP includes proposals for large scale commercial development in Horley (that part of the borough closest to the Ashdown Forest), and that these proposals were not considered in detail at the time the Core Strategy was prepared, it is considered important that this HRA considers the extent to which the Ashdown Forest SAC may be affected by the DMP.

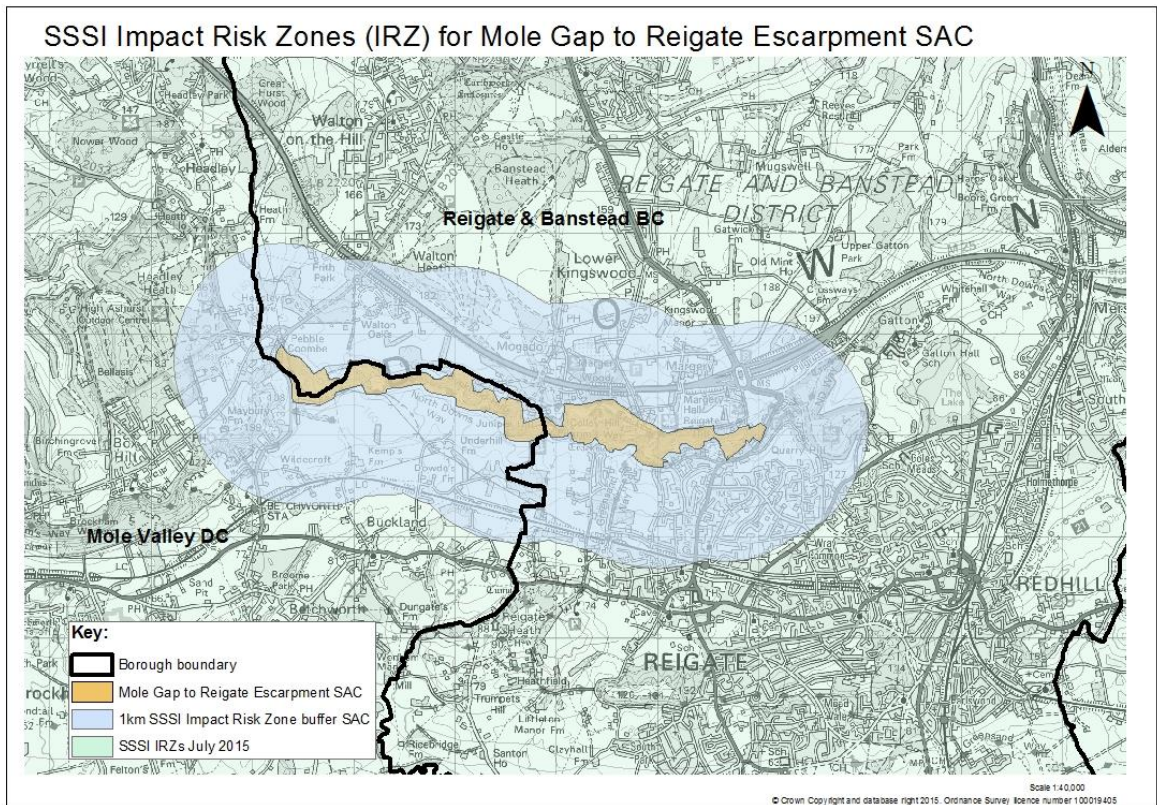
### **Mole Gap to Reigate Escarpment SAC**

- 5.10 The Mole Gap to Reigate Escarpment SAC stretches for 8 miles between Leatherhead and Reigate. The qualifying features are as follows:
- a. The only known locality in the United Kingdom of stable communities of Box woodland *Buxus sempervirens* on rock slopes
  - b. One of the best areas in the UK for chalk grassland *Festuco-Brometalia*; important orchid sites, and Yew *Taxus baccata* woodland
  - c. Significant presence of European dry heaths, Beech forests *Asperulo-Fagetum*; Great Crested Newt *Triturus cristatus*, Bechstein's Bat *Myotis bechsteini*.
- 5.11 Specific vulnerabilities associated with the Mole Gap to Reigate Escarpment SAC include:
- a. Vulnerability to recreational pressures, particularly chalk grassland.
  - b. Need to maintain a sympathetic grazing regime on chalk grassland and dry heaths.
  - c. Chalk grassland vulnerable to atmospheric pollution/competition from more vigorous acid loving species.
  - d. Atmospheric pollution may increase susceptibility of Beech trees to disease.
  - e. Loss of foraging and roosting sites ((ancient) woodland) for Bechstein's bats in the SAC and surrounding areas.
  - f. Severance of flight lines for Bechstein's bats (eg hedgerows).
  - g. Loss of foraging areas and refuge habitat for Great Crested Newts within 500m of ponds (ie in the SAC and surrounding areas).
  - h. Hydrological changes may impact on ponds within the chalk heath, either through pollution or groundwater abstraction.

5.12 On the advice of Natural England, consideration has been given to identified SSSI Impact Risk Zones (IRZs). In relation to the Mole Gap to Reigate Escarpment Special Area of Conservation, Natural England advise that there may be a likely significant effect from development falling within 1000m of this site (see Figure 6).



**Figure 6: Map of the Mole Gap to Reigate Escarpment**



### Ashdown Forest SAC

5.13 The Ashdown Forest SAC is located in Wealden District, around 15km to the south east of Reigate & Banstead. The qualifying features are as follows:

- a. European dry heaths, for which this is considered to be one of the best areas in the United Kingdom
- b. Northern Atlantic wet heaths, with *Erica tetralix*, for which this is also considered to be one of the best areas in the UK.
- c. Although not a qualifying feature, the site also supports a significant presence of great crested newts *Triturus cristatus*.

5.14 The specific vulnerability associated with the Ashdown Forest SAC relates to atmospheric pollution, with the main pollutant effects being acid deposition and eutrophication by nitrogen deposit affecting both the European dry heaths and North Atlantic wet heaths. Evidence suggests that the critical load for nitrogen deposition and acid deposition is already exceeded in parts of the Ashdown Forest.

5.15 Reigate & Banstead Borough appears to fall outside the NE identified impact risk zone for SSSI, however as noted in Figure 5 the southern extent of the borough does fall within 15km of the SAC.

## Identification of other plans and projects which may have 'in combination effects'

- 5.16 As part of the screening assessment to determine whether the plan is likely to have a significant effect on a European site, it is necessary also to consider whether there may also be significant effects in combination with other plans or projects (referred to as 'in-combination effects').
- 5.17 Figure 7 provides a summary of the plans/projects that have been considered as part of screening assessment.

**Figure 7: Development plans and proposals in and around Reigate & Banstead Borough**

Authority/Area	Plan/project	Summary of proposals	HRA findings (if available)	Change to plan since adoption of Core Strategy?
Tandridge District Council	Core Strategy 2008	Provision for at least 2500 homes between 2006 and 2026	Core Strategy would not pose any significant risk to Mole Gap to Reigate Escarpment SAC or Ashdown Forest SPA/SAC. With measures put in place through the Core Strategy it is unlikely - either alone or in combination - to have a significant impact on these sites	No. Regulation 18 consultation document for revised local plan has been consulted on, but scale/location of development has not been finalised.
Mole Valley District Council	Core Strategy 2009	Provision for at least 3760 homes between 2006 and 2026 6-7 additional traveller pitches 2800sqm of new convenience retail floorspace	Impact on Mole Gap to Reigate Escarpment SAC from recreational pressure and air pollution will be minimal. With measures put in place through the Core Strategy it is unlikely - either alone or in combination - to have a significant impact on this site	No. Regulation 18 consultation document for revised local plan has been consulted on, but scale/location of development has not been finalised.
Epsom and Ewell Borough Council	Core Strategy 2007	Provision for at least 2715 homes between 2007 and 2022	Core Strategy would not have an impact on Natura 2000 sites due to separation distances from the borough, growth locations, and mitigation/avoidance measures included in the plan.	No. Regulation 18 consultation for revised local plan is ongoing but scale/location of development has not been finalised.
Guildford Borough Council	Local Plan 2003	Policy on housing provision no longer being applied; interim housing target of 322.	n/a	No. Revised local plan document has not yet been submitted for examination or adopted.
	Submission draft plan 2017	Provision for 12,426 new homes over plan period (2015/2034) 36,100 to 43,700sqm of office and R&D floorspace, 3.7-4.1ha of industrial floorspace, 41,000sqm of comparison retail floorspace 4 gypsy and traveller pitches to and 4 travelling showpeople	HRA in support of submission draft HRA concludes potential for impacts on the Thames Basin Heaths SPA identified, however subject to the inclusion of mitigation and avoidance measures proposed such as SANG the draft Local Plan would have no likely significant effects on the SPA alone or in combination	

		plots		
Elmbridge Borough Council	Core Strategy 2011	Provision for 3375 homes between 2011 and 2026 11 additional traveller pitches	Potential for adverse impacts on the Thames Basin Heaths SPA from recreation and urbanisation. With measures put in place through the Core Strategy it is unlikely - either alone or in combination - to have a significant impact on this site	No. Regulation 18 consultation document for revised local plan has been consulted on, but scale/location of development has not been finalised.
Waverley Borough Council	Local Plan 2002	Housing requirement out of date	n/a	No, although revised local plan is nearing the adoption stage.
	Local Plan Main Modifications 2017	Provision of 11,210 new homes between 2013 and 2032 Traveller target tbc At least 16,000sqm of office/R&D space	HRA in support of submission draft HRA concludes potential for impacts on the Thames Basin Heaths SPA identified, however subject to the inclusion of mitigation and avoidance measures proposed such as SANG the draft Local Plan would have no likely significant effects on the SPA alone or in combination	
London Borough of Sutton	Core Strategy 2009	Provision of at least 5175 homes to 2024	No likely significant effects on European sites identified	No, although revised local plan is nearing the adoption stage.
	Submission draft Plan 2016	Provision of at least 6,405 new homes between 2016 and 2031 At least 10 ha for industrial uses, 23,000sqm office floorspace, 36,000 retail floorspace and 10,000sq gross for leisure uses.	No likely significant effects on European sites identified	
London Borough of Croydon	Local Plan 2013	Provision of at least 20200 homes between 2011 and 2031 10 additional traveller pitches Up to 165000sqm of new employment floorspace	Taking into account the distance of development from the Mole Gap to Reigate Escarpment SAC, Wimbledon Common SAC and Richmond Park SAC, and commitment to establishing a network of alternative open spaces the Plan would not have a likely significant impact on these sites.	No, although revised local plan is nearing the adoption stage.
	Strategic Policies partial review 2016	Provision of up to 32,880 home between 2016 and 2036 Up to 92,000sqm of office floorspace At least 36 traveller pitches	Plan includes sufficient in-built mitigation such that all policies can be screened out from having likely significant effects upon any European designated sites, including the Mole Gap to Reigate Escarpment.	

London Borough of Kingston	Core Strategy 2012 and Town Centre AAP 2008	Provision of 5625 homes between 2012 and 2027. 50000sqm of retail floorspace	Core Strategy - Potential for impact on Natura 2000 sites from recreational pressures and air pollution, however taking into account the location of most growth and measures to reduce air pollution the Plan is unlikely - either alone or in combination - to have a significant impact on these sites	No
Crawley Borough Council	Local Plan 2016	About 5,000 new homes between 2015 and 2030 Up to 10 additional traveller pitches Between 23ha and 35ha of new employment land	No significant impacts identified on European sites, including the Ashdown Forest SAC alone or in combination with other plans or projects	Yes
Horsham District Council	Horsham District Planning Framework 2015	16000 new homes between 2011 and 2031 39 additional traveller pitches New business park at land north of Horsham, university quarter mixed use development and employment site intensification	Taking into account proposed avoidance and mitigation measures the plan will not have an adverse effect on site integrity of any European site, alone or in combination with other plans or projects.	Yes.
Mid Sussex District Council	Local Plan 2004	Housing requirement out of date	n/a	No, although revised local plan is nearing the adoption stage.
	District Plan 2016 (main modifications)	An average of 876 new homes per year until 2023/24. An average of 1,090 new home per year between 2024/5 and 2030/31 subject to no further harm to the integrity of the Ashdown Forest . 23 additional traveller pitches 25ha business park	No adverse impact on Mole Gap to Reigate Escarpment SAC. Adverse effects resulting from atmospheric pollution are not considered likely for the Ashdown Forest SAC. Disturbance impacts are assessed as potentially affecting the Ashdown Forest SPA, however, they are considered to be adequately avoided and mitigated by the District Plan via the implementation of SANG.	
Wealden District Council	Core Strategy 2013	9400 homes between 2006 and 2027 32 additional traveller pitches 40,000sqm employment floorspace	Potential effects identified on Ashdown Forest SAC/SPA, Lewes Downs and Pevensey Levels SAC. Subject to adoption of mitigation measures, recreation and urbanisation effects on the Ashdown Forest, and surface water impacts on the Pevensey Levels could be overcome, in which case the Core Strategy would not alone or in combination have a significant effect	No

			on these sites	
Surrey County Council	Surrey Waste Plan 2008	Identifies potential waste management sites in the borough – Earlswood Depot and Copyhold works	Possible effects identified on Natura 2000 sites from thermal processing emissions, traffic emissions, dust, land take, water discharge, pest and predators and litter. Concludes that proposed developments were unlikely to result in harmful impact and that the Plan would not have any alone or in-combination effects on European sites	No. Plan is in the process of being revised but has not reached an advanced stage.
	Surrey Minerals Plan 2011	Identifies Chilmead Farm as an area of search for silica sand extraction	Potential effect on SW London Waterbodies SPA can be mitigated. No adverse impact on the Mole Gap to Reigate Escarpment identified.	No
	Surrey Aggregates Recycling Joint DPD 2013	Identifies potential for waste management uses at Copyhold works, and aggregates depot at Salfords	The Plan would not give rise to any significant effects on the condition and integrity of Natura 2000 sites	No
	Local Transport Plan 2014	Objective of securing reliable transport network and promoting sustainable transport options	The Plan would not give rise to any significant effects on the condition and integrity of Natura 2000 sites	Yes
Surrey Hills Area of Outstanding Natural Beauty	AONB Management Plan 2014	Includes policies in relation to activities in the AONB, including farming, recreation and tourism, land use planning and traffic and transport	Most plan objectives found to have either a positive or neutral effect on Natura 200 sites or were not applicable. Potential uncertain effects in relation to farming and recreation however these can be reconciled with appropriate management. The Plan would not therefore give rise to significant effects on the identified sites.	Yes

5.18 In the majority of instances there has been no change to the content of these plans since the Core Strategy was adopted

5.19 In those cases where new plans have been adopted, these include provision for mitigation and/or avoidance measures such that it has been concluded that the new plans will not have a likely significant effect on European sites or species.

## Screening assessment of emerging DMP objectives

- 5.20 A screening assessment of each proposed DMP objective, as set out in the consultation document, was carried out. The results of this assessment are included at Annex 2.
- 5.21 This screening assessment concluded that none of the objectives (on their own) directly result in activities or operations. Rather it is the ways in which these objectives are achieved that may generate activities or operations which could have effects on Natura 2000 sites. On their own, therefore, it is concluded that none of the objectives could have a likely significant effect on Natura 2000 sites, specifically the Mole Gap to Reigate Escarpment SAC or Ashdown Forest SAC.
- 5.22 The screening assessment of objective also highlights that several of the objectives allow for the provision of measures in the DMP to avoid or mitigate the impact of development on Natura 2000 sites.

## Screening assessment of DMP emerging policy approach

- 5.23 A screening assessment of each proposed policy approach in the DMP consultation document was carried out. The results of this assessment are included at Annex 3.

### **Criteria based policies that guide the detailed design and siting of new development**

- 5.24 The majority of policy approaches proposed are criteria-based policies to guide the detailed design of new development. These policy approaches do not directly have an impact on the scale or location of new development. They will not have a likely significant effect on Natura 2000 sites (specifically the Mole Gap to Reigate Escarpment SAC or Ashdown Forest SAC) and have therefore been screened out.

### **Criteria based policies that have a positive effect in relation to European sites and species**

- 5.25 A number of the policy approaches proposed will have a positive impact in relation to, or seek to safeguard, European sites and species. These policies – along with provision in the Core Strategy – will together ensure the any likely impact of new development on European sites and species will be avoided or mitigated. These proposed policy approaches have therefore been screened out.

### **Emerging policy approaches that relate to the scale or location of development**

- 5.26 A number of the policy approaches proposed were identified as potentially relating to the scale or location of physical development or other activities or

operations. For all but one proposed policy approach where activities or operations could directly result from the policy approach, the effects of the policy approach were identified as being small scale in relation to the effects arising from existing development, operations or activities, and/or a sufficient distance from any Natura 2000 site such that impact would be avoided. In all cases the proposed policy approaches are consistent with the framework for growth set out in the Core Strategy. For these policy approaches, therefore, no potential to affect any European site has been identified, and – taking into account avoidance and mitigation measures secured by other proposed policy approaches – it can be concluded that these proposed policy approaches would not have a likely significant effect on any European site.

- 5.27 One policy approach (OSR 3, relation to provision of new outdoor sports provision) was identified as having the potential to result in the removal of trees and hedgerows, which could impact on bat foraging and flight lines. However the policy also includes a criteria to ensure that any such development does not have any adverse effect on features of biodiversity value. Taking this potential avoidance/mitigation measure into account, it can be concluded that this proposed policy approach would not have a likely significant effect on any European site.

## Screening assessment of DMP potential development site options

- 5.28 A screening assessment for each development site in the draft DMP was carried out. The results of this assessment are included at Annex 4.

### Mole Gap to Reigate Escarpment

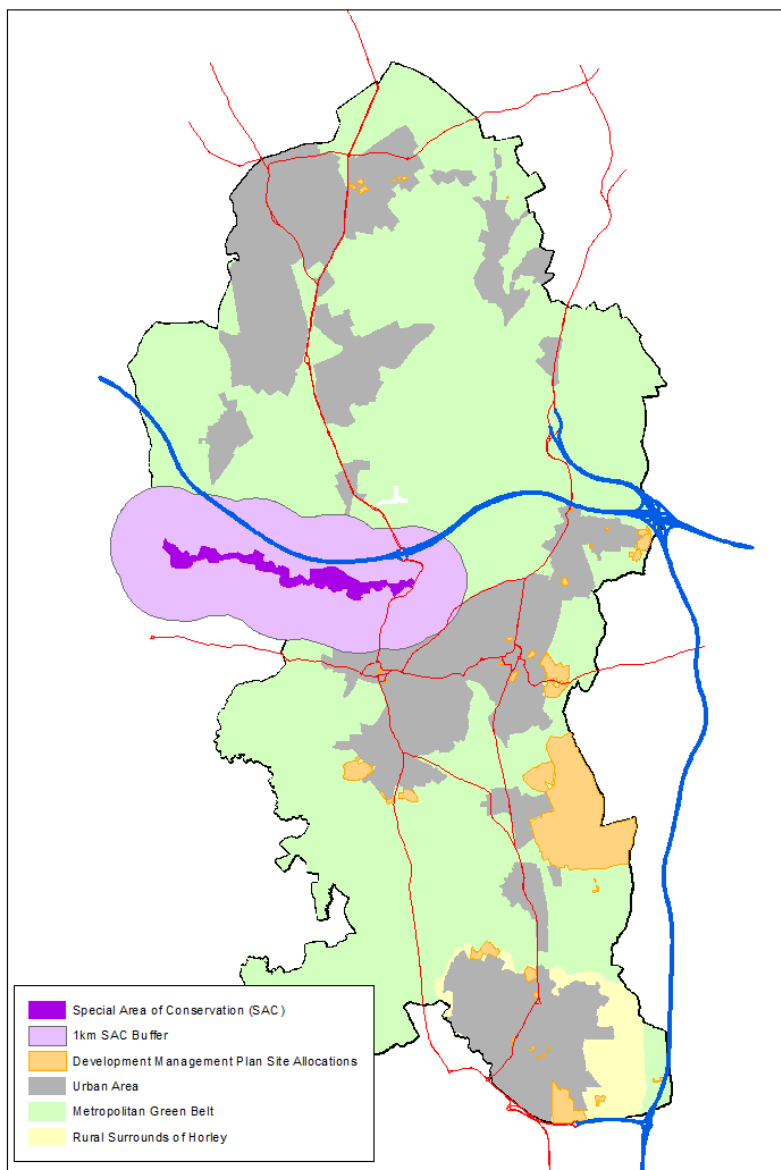
- 5.29 Figure 8 shows the potential development site options in relation to the Mole Gap to Reigate Escarpment SAC.
- 5.30 This map illustrates that all but one development site included in the draft Plan fall outside the 1km SAC Impact Risk Zone.
- 5.31 The detailed assessment in the Annex also considers the scale and type of development proposed and the potential avoidance and mitigation measures incorporated within the Core Strategy and proposed DMP policy approaches.
- 5.32 The site that falls within the 1km IRZ is Albert Road North, Reigate. However this is a previously developed site within the urban area, and is separated from the SAC by the railway line, low density residential development and Green Belt. Potential new residential development on the site would be of a small scale in relation to the surrounding residential areas of Reigate, and there is no easy direct access from the site to the SAC, meaning that recreational impact arising from the new development is likely to be minimal. Redevelopment in this area would not obviously disrupt bat flight lines to foraging /roosting areas.
- 5.33 A large scale employment development proposal is identified in the south of the borough (HOR9). This site was not specifically envisaged at the time the Core Strategy was prepared. The site is approximately 10km from the Mole Gap to Reigate Escarpment SAC. Given the distance from the site, and the fact that an



on-site public park is proposed as part of the development, it is concluded that new employment floorspace would not have a recreational impact on the site, nor would it impact via cessation of grazing or disturbance to roosting populations of Bechstein's bats.

5.34 Taking into account the scale of development compared to existing levels of population and development, the fact that (apart from HOR9) the scale of development being proposed is consistent with that set out in the Core Strategy, and the proposed mitigation and avoidance measures, it can be concluded that none of the development site allocations would have a likely significant effect on the Mole Gap to Reigate Escarpment SAC.

**Figure 8: Potential development site options in relation to the Mole Gap to Reigate Escarpment SAC**



## Ashdown Forest SAC

- 5.35 A large scale employment development proposal is identified in the south of the borough (HOR9). This site was not specifically envisaged at the time the Core Strategy was prepared. All other development proposals in the DMP are consistent with the scale of development in the adopted Core Strategy.
- 5.36 The very southern part of the borough falls within the 15km 'as the crow flies' distance of the Ashdown Forest SAC.
- 5.37 New employment floorspace would generate increased road traffic on the M23 and the wider road network. The main access to the site would be via a new junction arm at junction 9a of the M23 spur road, around 13 miles drive from the Ashdown Forest.
- 5.38 Annex 5 provides an assessment of the likely impact of this site on the Ashdown Forest SAC, based on transport modelling undertaken in support of the DMP.
- 5.39 The evidence suggests that any increase in road traffic on roads in the vicinity of the SAC generated by the Horley Business Park will be marginal over and above baseline growth. Taken alongside proposed policies NHE2 (which makes it clear that proposals will only be permitted where it can be demonstrated that they will not have an adverse impact on the integrity of Natura 2000 sites and / or that any impacts will be suitably mitigated) and HOR9 (which requires measures to promote modal shift away from the private care and towards sustainable transport modes) it can be concluded that the Horley Employment site allocation will not result in adverse effects on the Ashdown Forest SAC.
- 5.40 All other development allocations are consistent with the scale and type of growth set out in the adopted Core Strategy, and no specific impacts have been identified arising from their specific location or other allocation details. Taken alongside site-specific and general mitigation and avoidance measures it can be concluded that none of the other development site allocations would have a likely significant effect on the Ashdown Forest SAC.

## Conclusions of DMP Regulation 18 Screening Assessment

- 5.41 The DMP consultation document does not, generally, seek to deliver development in a different manner – either in extent or location – to that set out in the adopted Core Strategy. The exception is the potential strategic employment development site identified to the south of Horley – whilst the Core Strategy identifies that strategic proposals for employment development may come forward in the future, it does not provide detail in terms of general location or scale.
- 5.42 The Core Strategy includes within it measures to avoid or mitigate the impact of new development on Natura 2000 sites, in particular policy CS2, which requires that any proposal for development that is likely to have a significant effect on the Mole Gap to Reigate Escarpment SAC, alone or in combination with other

development, will be required to demonstrate that it will not adversely affect the integrity of the SAC. This policy would apply to any new development proposal.

- 5.43 In addition, proposed DMP policy NHE2 requires that any proposals for new development that is likely to have a significant impact on any Natura 2000 site will be required – at the planning application stage – to demonstrate that it will not adversely affect the integrity of that site.
- 5.44 Finally, where the potential for some limited impact on Natura 2000 sites has been identified, specific policy references are included within the draft DMP to ensure that any potential impact is avoided.
- 5.45 The screening assessment undertaken for the DMP objectives, proposed policy approaches, and potential development site opportunities therefore has concluded that the proposals within the draft DMP will not have any significant impacts, either alone or in combination with other plans, on the integrity of any European site or species.

## **6. Next Steps**

- 6.1 On the basis of the screening assessment conclusions, progression to a Stage 2 Appropriate Assessment (AA) is not required.
- 6.2 This HRA Screening Assessment will be kept under review as policies and site allocations for inclusion in the final draft DMP are taken through the Examination process. A further HRA (and as appropriate AA) will be prepared in support of the final DMP for adoption by the Council.

# Annex 1: Summary of Natura 2000 sites within 15km of Reigate & Banstead borough

NAME OF SITE	SITE DESIGNATION STATUS	LOCAL AUTHORITY AREA	APPROX. DIST. FROM RBBC BOUNDARY (KM)	REASON FOR DESIGNATION/ KEY CHARACTERISTICS.
Mole Gap to Reigate Escarpment	SAC	Reigate and Banstead; Mole Valley	0 (within boundary)	<p>The SAC is 888ha in area, of which 60% is broad-leaved deciduous woodland, 25% is dry grassland and 15% is heath/scrub. Most of this site is a mosaic of chalk downland habitats, ranging from open chalk grassland to scrub and broadleaved semi-natural woodland on the scarp slope of the North Downs.</p> <p>The Mole Gap is the only known outstanding locality in the United Kingdom of stable communities of Box woodland <i>Buxus sempervirens</i> on rock slopes (the total extent of this community in the United Kingdom is estimated to be less than 100 hectares). This occurs on steep chalk slopes where the river Mole has cut into the North Downs Escarpment. The site is considered to be one of the best areas in the United Kingdom for chalk grassland <i>Festuco-Brometalia</i>, important orchid sites and Yew <i>Taxus baccata</i> woodland. The site is also considered to support a significant presence of European dry heaths, beech forests <i>Asperulo-Fagetum</i>; Great Crested Newt <i>Triturus cristatus</i>; Bechstein's bat <i>Myotis bechsteini</i>.</p>
Ashdown Forest	SAC & SPA	Wealden	12.5	<p>Ashdown Forest is one of the most extensive areas of wet and dry heathland in south-east England. It also has a significant presence of Great Crested Newts. During the breeding season the area regularly supports 1% of the GB breeding population of Nightjar <i>Caprimulgus europaeus</i>; 1.3% of the GB breeding population of Dartford Warbler <i>Sylvia undata</i>.</p>
Thames Basin Heaths	SPA	Elmbridge & Guildford	11.8	<p>Internationally important lowland heathland formed by a mosaic of habitats. During the breeding season the area regularly supports 7.8% of the GB breeding population of Nightjar <i>Caprimulgus europaeus</i>; 9.9% of the GB breeding population of Woodlark <i>Lullula arborea</i>; and 27.8% of the GB breeding population of Dartford Warbler <i>Sylvia undata</i>.</p>
South West London Water bodies	SPA & Ramsar Site	Elmbridge	13.3	<p>A series of reservoirs and former gravel pits that support internationally important populations of Shoveler Duck <i>Anas clypeata</i> (2.1% of the population of North-western/Central Europe); and Gadwall Duck <i>Anas strepera</i> (2.4% of the population of North-western Europe). As a Ramsar Site it also supports nationally important populations of Black-necked grebe <i>Podiceps nigricollis nigricollis</i> and Smew <i>Mergellus albellus</i> during the winter and nationally important populations of Great crested grebe <i>Podiceps cristatus cristatus</i>, Great cormorant <i>Phalacrocorax carbo carbo</i> and Tufted duck <i>Aythya fuligula</i> during the spring/ autumn.</p>

NAME OF SITE	SITE DESIGNATION STATUS	LOCAL AUTHORITY AREA	APPROX. DIST. FROM RBBC BOUNDARY (KM)	REASON FOR DESIGNATION/ KEY CHARACTERISTICS.
Richmond Park	SAC	Merton; Wandsworth; Richmond-upon-Thames.	9.4	Richmond Park has a large number of ancient trees with decaying timber. It is at the heart of the south London centre of distribution for the European stag beetle <i>Lucanus cervus</i> .
Wimbledon Common	SAC	Merton; Wandsworth; Richmond-upon-Thames.	9.4	The site is one of only four known outstanding localities in the United Kingdom for European stag beetle <i>Lucanus cervus</i> . The area is considered to support a significant presence for European dry heaths and Northern Atlantic wet heaths with cross-leaved heath <i>Erica tetralix</i> .

## Annex 2: Screening Assessment of proposed DMP objectives

DMP objective	Likely activities / operations to result as a consequence of the proposal	Likely effects if proposal implemented	European sites potentially affected	Potential mitigation measures - if implemented would avoid likely significant effect	Could the proposal have a likely significant effects on European sites (taking mitigation into account)
PE1: Safeguard existing employment land and premises to ensure that there is adequate space for businesses to locate in the borough.	None directly: activities/operations will depend on policy approach and site allocations, which will be separately assessed for their potential to have significant effect on European sites	N/A	N/A	N/A	N/A
PE2: Provide flexibility for local businesses to start up, grow, diversify and prosper.				N/A	N/A
PE3: Help new development to deliver jobs and skills benefits for local people				N/A	N/A
PE4: Protect the vitality and viability of our town centre shopping areas				N/A	N/A
PE5: Protect the viability of smaller scale but vital local shopping areas				N/A	N/A
PE6: Ensure that both town and local centres are resilient and able to respond to future changes				N/A	N/A
SC1: To ensure that new development makes the best use of land whilst also being well designed and protecting and enhancing local character and distinctiveness	None directly: activities/operations will depend on policy approach and site allocations, which will be separately assessed for their potential to have significant effect on European sites	N/A	N/A	N/A	N/A
SC2: To ensure an appropriate mix of housing types and sizes, offering a good standard of living to future occupants				Use of housing standards including in relation to water efficiency will help contribute to minimising the need for groundwater abstraction which could have a negative impact on the SAC	N/A
SC3: To minimise the impacts of development, and the development process, on local residents and local amenity				N/A	N/A
SC4: Protect the most valuable open space within the urban areas				Protection of urban open space will ensure alternative local recreation opportunities are maintained, helping to relieve recreational pressure on the SAC	N/A
SC5: Encourage the provision of open space as part of new developments, and where appropriate new outdoor sport and recreation provision.	None directly: activities/operations will depend on policy approach and site allocations, which will be separately assessed for their potential to have significant effect on European sites	N/A	N/A	Provision of new open space as part of new developments will ensure alternative local recreation opportunities are provided, helping relieve recreational pressure on the SAC	N/A
SC6: Require new developments to provide adequate parking, whilst recognising the need to encourage sustainable transport choices, particularly in the most accessible locations				N/A	N/A
SC7: Ensure new developments are served by safe and well designed access for vehicles, pedestrians and cyclists				N/A	N/A
SC8: Encourage new development to incorporate passive and active energy measures and climate change resilience measures and renewable energy technologies				Passive and active climate change resilience measures have the potential to help to limit the environmental impact of new development, for example by increasing water efficiency and minimising the need for groundwater abstraction	N/A
SC9: Direct development away from areas at risk of flooding, and ensure all developments are safe from flood risk and do not increase flood risk elsewhere or result in a reduction in water quality				Managing flood risk and in particular water quality will help prevent groundwater pollution which could have negative impacts on the SAC	N/A

SC10: Ensure new development protects, and enhances wherever possible, the borough's landscapes and biodiversity interest features, providing the highest degree of protection to internationally and nationally designated areas.				Protection of the SAC is inherent within this objective, and the policy approach to protecting biodiversity is a key tool in avoiding impact and securing mitigation	N/A
SC11: Maximise the contribution of new development to a comprehensive green infrastructure network across the borough.				Provision of a comprehensive GI network across the borough will ensure that alternative recreation opportunities are available to residents, helping to relieve recreational pressure on the SAC. Maintenance of green corridors will help safeguard bat flight lines.	N/A
SC12: Control development in the Green Belt to safeguard its openness, and where possible enhance its beneficial use.	None directly: activities/operations will depend on policy approach and site allocations, which will be separately assessed for their potential to have significant effect on European sites	N/A	N/A	Controlling development in the Green Belt (which covers the SAC and much of the area surrounding the SAC) will help minimise impact from recreation, urbanisation effects, air pollution or groundwater pollution/abstraction.	N/A
SC13: Conserve and enhance designated heritage assets across the borough, supporting their continuing viable use and cultural benefits.				N/A	N/A
PS1: Identify a local target for gypsy, traveller and travelling showpeople sites, and allocate sites to achieve this target.	None directly: activities/operations will depend on policy approach and site allocations, which will be separately assessed for their potential to have significant effect on European sites	N/A	N/A	N/A	N/A
PS2: Ensure future cemetery and/or crematorium provision is located consistent with sustainability principles				N/A	N/A
PS3: Allocate sites for development across the borough consistent with the Core Strategy and sustainability principles				Consideration of sustainability principles in this objective should mean that avoidance and mitigation measures are considered as a central part of the site allocation process	N/A
PS4: Plan for improvements to existing infrastructure and services, and/or the provision of new infrastructure and services, to meet the needs created by new development.				Infrastructure could include infrastructure to avoid or mitigate the impacts of development on the SAC	N/A

## Annex 3: Screening assessment of DMP policies

DMP policy approach	Policy title and likely activities / operations to result as a consequence of the proposal	Likely effects if proposal implemented	European sites potentially affected	Potential mitigation measures - if implemented would avoid likely significant effect	Could the proposal have a likely significant effects on European sites (taking mitigation into account)
EMP1	Principal Employment Areas: The policy focuses on future industrial and commercial development proposals in existing employment locations	None. Relates to development in existing employment areas (eg the redevelopment of existing buildings), the nearest of which is 2.7km to the SAC. Highly unlikely to result in a substantive increase in vehicular movements over and above baseline, increased air pollution, recreational pressure or hydrological impact on the Mole Gap to Reigate Escarpment SAC or Ashdown Forest SAC.	No	Other DMP policies seek to secure the implementation of mitigation measures, including DES1 (General design, including GI provision), TAP1 (which encourages sustainable transport initiatives) NHE2 (biodiversity, making it clear that development that is likely to have a detrimental impact on Natura 2000 sites will not be permitted), and NHE4 (Green and blue infrastructure). Core Strategy policy requires proposals for development that is likely to have a significant effect on the Mole Gap to Reigate Escarpment SAC to demonstrate that it will not adversely affect the integrity of the site.	No
EMP2	Local Employment Areas: The policy focuses on future employment generating uses in existing employment locations	None. Relates to development in existing employment areas. The identified local employment areas are small scale and highly unlikely to result in a substantive increase in vehicular movements over and above baseline, increased air pollution, recreational pressure or hydrological impact on the Mole Gap to Reigate Escarpment SAC or Ashdown Forest SAC.	No		No
EMP3	Employment Development Outside Employment Areas: The policy focuses on future employment development outside employment areas.	None. Relates to new employment development. Whilst there is the potential for some of this new development to be within 1km of the SAC, the policy approach includes criteria to ensure that the type, scale and intensity of development is appropriate to the locality, and allows for the type and level of activity to be limited through conditions	No		No
EMP4	Safeguarding employment land and premises: The policy focuses on protecting existing employment development. The policy may result in change of use some premises from employment to residential.	None. The policy is not spatial but seeks to safeguard land in employment use but recognises that in some cases this may not be viable. The policy would only be likely to result in a small scale increase in residential development over an above that that can be achieved via current permitted development regulations.	No	Other DMP policies seek to secure the implementation of mitigation measures alongside any changes of use, including DES1 (General design, including GI provision), TAP1 (which encourages sustainable transport initiatives), NHE2 (biodiversity, making it clear that development that is likely to have a detrimental impact on the SAC will not be permitted), NHE3 (protecting trees, woodland areas, hedgerows and other natural habitats) NHE4 (Green and blue infrastructure); NHE5 (controlling the scale of development in the Green Belt). Core Strategy policy requires proposals for development that is likely to have a significant effect on the Mole Gap to Reigate Escarpment SAC to demonstrate that it will not adversely affect the integrity of the site.	No
EMP5	Local skills and training opportunities: None identified – the policy approach relates to skills provision rather than physical development	N/A	N/A	N/A	N/A
RET1	Development in town centre frontages: The policy guides the future mix of town centre development within existing town centres. This could result in a small increase in retail floorspace and / or residential units in town centres and/or increased use of local centres by residents.	None. The policy relates to development within existing town centres. The nearest town centre to the SAC is Reigate, which is 1.1km from the SAC. Development intensification in Reigate town centre will be minimal compared with existing development in and around the town	No	Other DMP policies seek to secure the implementation of mitigation measures, including DES1 (General design, including GI provision), TAP1 (which encourages sustainable transport initiatives), NHE2 (biodiversity, making it clear that development that is likely to have a detrimental impact on the Natura 2000 sites will not be permitted), and NHE4 (Green and blue infrastructure). Core Strategy policy requires proposals for development that is likely to have a significant effect on the Mole Gap to Reigate Escarpment SAC to demonstrate that it will not adversely affect the integrity of the site.	No
RET2	Development within identified retail frontages and local centres: None identified - The policy guides the detailed design of development within existing town centres	N/A	N/A	N/A	N/A
RET3	Development in local centres: The policy guides the future mix of development within local centres. This could result in a small scale increase in residential development in local centres and/or increased use of local centres by residents.	None. The policy relates to small scale development only. Any increase in population from new residential units would be minimal when compared with existing levels of population.	No	Other DMP policies seek to secure the implementation of mitigation measures, including DES1 (General design, including GI provision), TAP1 (which encourages sustainable transport initiatives), NHE2 (biodiversity, making it clear that development that is likely to have a detrimental impact on the Natura 2000 sites will not be permitted), and NHE4 (Green and blue infrastructure).	No



RET4	Development in smaller centres and for isolated shops: The policy guides the future use of small local shopping parades and isolated shops. This could result in a small scale increase in residential development in these areas.	None. The policy relates to small scale development only. Any increase in population from new residential units would be minimal in when compared with existing levels of population.	No	Core Strategy policy requires proposals for development that is likely to have a significant effect on the Mole Gap to Reigate Escarpment SAC to demonstrate that it will not adversely affect the integrity of the site.	No
RET5	Development of town centre uses outside town and local centres: The policy guides the location of retail, leisure and office development outside town centres. This policy could result in new retail, leisure or office development in the existing urban area.	None. The policy focuses these types of development in town centres as a priority, and requires impact assessments to demonstrate that proposals would not have a detrimental impact on town centre. This suggests that any proposals that are permitted would be of a smaller scale and that their impact would be minimal compared to existing levels of development within the urban area	No		No
RET6	Retail warehousing: This policy guides future development in existing retail warehouse areas. It could result in an increase in intensification and thus more trips to these areas.	None. Relates to development in existing developed retail warehouse areas. Any intensification will be of a relatively small scale compared to background levels of development/traffic generation. The Redhill Retail Warehouse area lies about 2.5km from the Mole Gap to Reigate Escarpment SAC; the Reigate one just over 1km, separated by the railway line, Reigate Hill and areas of residential development. Both areas – given their scale – are unlikely to attract development from the wider sub-region.	No		No
DES1	The design of new development: None identified – This policy guides the detailed design of development rather than the quantum, type or location of development.	N/A	N/A	This policy requires that new development contributes to the delivery of green infrastructure assets and networks	N/A
DES2	Residential garden land development: This policy guides the detailed design of development rather than the quantum, type or location of development.	N/A	N/A	This policy requires the retention of mature trees and hedges, existing landscape features and the maintenance of green corridors	N/A
DES3	Residential areas of special character: This policy guides the detailed design of development rather than the quantum, type or location of development.	N/A	N/A	This policy requires the retention and enhancement (using appropriate species) of existing tree cover, landscaping, green areas and other vegetation.	N/A
DES4	Housing mix: This policy guides the design of new homes and new housing developments rather than the overall quantum or location of residential development.	N/A	N/A	N/A	N/A
DES5	Delivering high quality homes: This policy guides the design of new homes and new housing developments rather than the overall quantum or location of residential development.	N/A	N/A	This policy seeks the provision of private or communal outdoor amenity space	N/A
DES6	Affordable housing: This policy requires that a proportion of homes should be provided as affordable. It does not directly relate to the overall quantum or location of residential development.	N/A	N/A	N/A	N/A
DES7	Specialist accommodation: This policy guides the location of residential caravans and seeks to secure provision of housing for older people and those with support needs.	None. The policy is not spatial and relates to small scale development only, which would have a minimal impact compared to existing levels of development	N/A	Other DMP policies seek to secure the implementation of mitigation measures, including DES1 (General design, including GI provision), TAP1 (which encourages sustainable transport initiatives), NHE2 (biodiversity, making it clear that development that is likely to have a detrimental impact on the Natura 2000 sites will not be permitted), and NHE4 (Green and blue infrastructure). Core Strategy policy requires proposals for development that is likely to have a significant effect on the Mole Gap to Reigate Escarpment SAC to demonstrate that it will not adversely affect the integrity of the site.	No
DES8	Community facilities: This policy resists the loss of existing community facilities and encourages the provision of new facilities to meet local needs.	None. The policy is not spatial but seeks to safeguard community uses. In some cases this may not be viable and sites may be converted to residential use, however this would only be of a small scale with negligible impact over and above existing development. New community and sports facilities could help deflect recreational pressures, and would only be a local (rather than sub-regional) scale.	N/A	N/A	No

DES9	Electronic communications networks: None identified – the policy approach relates to the design and siting of equipment not the principle of development	N/A	N/A	N/A	N/A
DES10	Construction management: This policy relates to the process of securing permission and undertaking development. It does not directly relate to the overall quantum or location of residential development.	N/A	N/A	This policy requires consideration of the impacts of the development process on wildlife and vegetation.	N/A
DES11	Pollution and contaminated land: This policy guides the detailed design of development rather than the quantum, type or location of development.	N/A	N/A	This policy requires development to minimise the impact of all types of pollution, and requires that development avoids significant adverse or unacceptable impact on the natural environment and sensitive habitats, requiring appropriate mitigation where necessary	N/A
DES12	Advertisements and shop front design: This policy guides the detailed design of development rather than the quantum, type or location of development.	N/A	N/A	N/A	N/A
OSR1	Urban open space: This policy resists the development of open spaces within the urban area	N/A	N/A	N/A	N/A
OSR2	Open space in new development: This policy requires the provision of new open space as part of new developments	Positive: New open space may provide localised recreation opportunities, potentially reducing recreational pressure on protected sites	N/A	This policy requires new development to provide local recreation space, which may reduce recreational pressure on the SAC	N/A
OSR3	Outdoor sport and recreation: This policy may result in the development of outdoor sport and recreation facilities.	Development could result in removal of trees and hedgerows	Bat foraging and flight lines	This policy includes a criteria to ensure that any such development does not have any adverse effect on features of nature conservation and biodiversity value	No
TAP1	Access, parking and servicing: This policy guides the detailed design of development rather than the quantum, type or location of development.	N/A	N/A	This policy encourages sustainable transport options to reduce the need for travel by private car and encourages infrastructure to support ultra-low emissions vehicles	N/A
TAP2	Airport car parking: This policy resists the development of airport car parking	N/A	N/A	N/A	N/A
CCF1	Climate change mitigation: This policy guides the detailed design of development rather than the quantum, type or location of development.	N/A	N/A	This policy requires new development to meet the tighter water efficiency standards, which may help reduce the general requirement for groundwater abstraction by water companies	N/A
CCF2	Flood risk: This policy directs development away from areas at risk of flooding	None. The majority of the borough is not at risk of flooding, so there are many opportunities for development both outside areas of flood risk and in locations that will not have an effect on Natura 2000 sites.	No	Other DMP policies seek to secure the implementation of mitigation measures, including DES1 (General design, including GI provision), TAP1 (promoting sustainable transport), NHE2 (biodiversity, making it clear that development that is likely to have a detrimental impact on Natura 2000 sites will not be permitted), NHE4 (Green infrastructure), and NHE5 (controlling the scale of development in the Green Belt)	No
NHE1	Landscape protection: The policy offers some support for small scale development in rural areas to support rural communities.	None. May result in small scale rural development, however not likely to be of a scale that has an effect on Natura 2000 sites	N/A	Other DMP policies seek to secure the implementation of mitigation measures, including DES1 (General design, including GI provision), TAP1 (promoting sustainable transport), NHE2 (biodiversity, making it clear that development that is likely to have a detrimental impact on Natura 2000 sites will not be permitted), NHE4 (Green infrastructure), and NHE5 (controlling the scale of development in the Green Belt). Core Strategy policy requires proposals for development that is likely to have a significant effect on the Mole Gap to Reigate Escarpment SAC to demonstrate that it will not adversely affect the integrity of the site.	No
NHE2	Protecting and enhancing biodiversity and areas of geological importance: This policy relates to the protection and enhancement of biodiversity	Positive. This policy seeks to protect Natura 2000 sites and supports alternative recreation provision	N/A	This policy affords the Mole Gap to Reigate Escarpment SAC, and other Natura 2000 sites, the highest level of protection, making it clear that development which is likely to have a detrimental effect on these sites will not be permitted. It also supports the provision of measures to divert recreational pressure from the Mole Gap to Reigate Escarpment SAC.	N/A

NHE3	Protecting tress, woodland areas and natural habitats: This policy relates to the protection of trees and woodland areas	Positive. This policy seeks to safeguard trees and woodland (including ancient woodland) and protect hedgerows.	N/A	This policy protects against the loss of ancient woodland, trees and hedgerows.	N/A
NHE4	Green / Blue Infrastructure: This policy encourages the provision of green and blue infrastructure	Positive. This policy requires that development proposals should avoid adverse impacts on existing habitats, and maintain links and corridors, including for biodiversity	N/A	This policy seeks to protect and enhance habitats and green networks/corridors.	N/A
NHE5	Development within the Green Belt: This policy offers some support for small scale development / redevelopment in areas of Green Belt.	None. May result in small scale extension to, or reuse of, buildings in the Green Belt, however not likely to be of a scale that has an effect on Natura 2000 sites.	No	Other DMP policies seek to secure the implementation of mitigation measures, including DES1 (General design, including GI provision), TAP1 (encouraging sustainable transport measures) NHE2 (biodiversity, making it clear that development that is likely to have a detrimental impact on the SAC will not be permitted), NHE4 (Green infrastructure), and NHE5 (controlling the scale of development in the Green Belt). Core Strategy policy requires proposals for development that is likely to have a significant effect on the Mole Gap to Reigate Escarpment SAC to demonstrate that it will not adversely affect the integrity of the site.	No
NHE6	Reuse and adaptation of buildings in the Green Belt and Rural Surrounds of Horley: This policy offers some support for the reuse and adaptation of buildings in the countryside	None. May result in small scale extension to, or reuse of, buildings in the countryside, however not likely to be of a scale that has an effect on Natura 2000 sites.	No		No
NHE7	Rural Surrounds of Horley: This policy offers some support for small scale development / redevelopment in areas of countryside around Horley	None. May result in small scale extension to, or reuse of, buildings in the countryside, around Horley however not likely to be of a scale that has an effect on Natura 2000 sites.	No		No
NHE8	Horsekeeping and equestrian development: This policy offers some support for small scale equestrian facilities in rural areas.	None. May result in small scale extension to existing buildings or slight intensification of use however not likely to be of a scale that has an effect on Natural 2000 sites	No		No
NHE9	Heritage Assets: Policy relates to minimising the impact of development on heritage assets	N/A	N/A	N/A	N/A
GTT1	Gypsy, Traveller and Travelling Showpeople Accommodation: This policy identifies sets traveller sites for allocation, the quantum of development and issues that will need to be addressed to make development in these locations acceptable.	N/A See Annex 4 for screening assessment of individual sites.	N/A	N/A	N/A
CEM1	Cemetery and crematorium provision: This policy provides criteria to guide the assessment of proposals for new cemetery and crematorium development. It could result in the provision of new facilities, most likely to be outside the urban area.	None, the policy includes a specific criterion to ensure that applications will only be supported where they would not have an unacceptable impact on biodiversity.	No	Other DMP policies seek to secure the implementation of mitigation measures, including DES1 (General design, including GI provision), TAP1 (encouraging sustainable transport measures) NHE2 (biodiversity, making it clear that development that is likely to have a detrimental impact on the SAC will not be permitted), NHE4 (Green infrastructure), and NHE5 (controlling the scale of development in the Green Belt). Core Strategy policy requires proposals for development that is likely to have a significant effect on the Mole Gap to Reigate Escarpment SAC to demonstrate that it will not adversely affect the integrity of the site.	No
INF1	Infrastructure: This policy seeks to secure infrastructure to support new development.	The Council's infrastructure delivery plan will set out the infrastructure that is required in support of planned new development. No impact on Natura 2000 sites is envisaged.	None		No
MLS1	Phasing of urban extension sites: This policy relates to the timeframes within which urban extension sites would be brought forward rather than specific development proposals.	N/A	N/A	N/A	N/A
MLS2	Safeguarding land for development beyond the plan period: This policy removes land from the green belt to provide longer term certainty about Green Belt boundaries, it does not relate to specific development proposals.	N/A. Land within these areas can only be allocated through a subsequent review of the local plan, at which stage HRA will be undertaken.	N/A	N/A	N/A
HOR10	Rural Surrounds of Horley: This policy offers some support for small scale development / redevelopment in rural areas surrounding Horley	None. May result in small scale extension to, or reuse of, buildings in the Rural Surrounds of Horley, however not likely to be of a scale that has an effect on Natura 2000 sites.	No	Other DMP policies seek to secure the implementation of mitigation measures, including DES1 (General design, including GI provision), TAP1 (encouraging sustainable transport measures) NHE2 (biodiversity, making it clear that development that is likely to have a detrimental impact on the SAC will not be permitted), NHE4 (Green infrastructure), and NHE5 (controlling the scale of development in the Green Belt). Core Strategy policy requires proposals for development that is likely to have a significant effect on the Mole Gap to Reigate Escarpment SAC to demonstrate	No

## Annex 4: Screening assessment of DMP site allocations and opportunity sites

Potential development site option	Location and likely activities / operations to result as a consequence of the proposal	Likely effects if proposal implemented	European sites potentially affected	Potential mitigation measures - if implemented would avoid likely significant effect	Could the proposal have a likely significant effects on European sites (taking mitigation into account)
<b>Area 1: The North Downs</b>					
BAN1	High Street Banstead Opportunity Area: Potential mixed use development in Banstead Town Centre, including up to 40 residential units and around 1200sqm of retail/community/leisure floorspace	None. Site is approx. 7.5km from the Mole Gap to Reigate Escarpment SAC and therefore falls well outside the 1000m impact risk zone. Site is in excess of 25 miles by road from the Ashdown Forest SAC. Potential scale of development is small in comparison with existing residential, community and commercial development in Banstead and in line with the Core Strategy.	No	Proposed DMP policies seek to secure the implementation of mitigation measures, including DES1 (General design, including GI provision), TAP1 (encouraging sustainable transport measures) NHE2 (biodiversity, making it clear that development that is likely to have a detrimental impact on Natura 2000 sites will not be permitted), and NHE4 (Green infrastructure). Core Strategy policy requires proposals for development that is likely to have a significant effect on the Mole Gap to Reigate Escarpment SAC to demonstrate that it will not adversely affect the integrity of the site.	No
BAN2	The Horseshoe, Banstead: Potential mixed use development in/adjoining Banstead Town Centre	None. Site is approx. 7.5km from the Mole Gap to Reigate Escarpment SAC and therefore falls well outside the 1000m impact risk zone. Site is in excess of 25 miles by road from the Ashdown Forest SAC. Potential scale of development is small in comparison with existing residential, community and commercial development in Banstead and in line with the Core Strategy.	No		No
BAN3	Banstead Community Centre: Potential mixed use development in Banstead Town Centre, including approx. 15 residential units and replacement/enhancement of community facilities	None. Site is approx. 7.5km from the Mole Gap to Reigate Escarpment SAC and therefore falls well outside the 1000m impact risk zone. Site is in excess of 25 miles by road from the Ashdown Forest SAC. Potential scale of development is small in comparison with existing residential, community and commercial development in Banstead and in line with the Core Strategy.	No		No
GT12	Land at Kents Field, Woodmansterne: Provision of up to 2 traveller pitches.	Site would be approximately 7.5km from the Mole Gap to Reigate Escarpment SAC and over 25 miles by road from the Ashdown Forest SAC. The scale of development proposed is small in comparison with existing residential development in the area and impact on Natura 2000 sites would be negligible.	No		No
<b>Area 2a: Redhill and Merstham</b>					
RTC2	Cromwell Road, Redhill: Potential mixed use development including up to 24 residential units (net) in Redhill town centre	None. Site is approx. 2.4km from the Mole Gap to Reigate Escarpment SAC. Site is in excess of 18 miles by road from the Ashdown Forest. Potential scale of development is small in comparison with existing residential and commercial development in Redhill and in line with the Core Strategy.	No	Proposed DMP policies seek to secure the implementation of mitigation measures, including DES1 (General design, including GI provision), TAP1 (encouraging sustainable transport measures), NHE2 (biodiversity, making it clear that development that is likely to have a detrimental impact on Natura 2000 sites will not be permitted), and NHE4 (Green infrastructure). Core Strategy policy requires proposals for development that is likely to have a significant effect on the Mole Gap to Reigate Escarpment SAC to demonstrate that it will not adversely affect the integrity of the site.	No
RTC4	Colebrook, Redhill: Potential mixed use development including up to 110 residential units in Redhill town centre	None. Site is approx. 2.4km from the Mole Gap to Reigate Escarpment SAC. Site is in excess of 18 miles by road from the Ashdown Forest. Potential scale of development is small in comparison with existing residential and community development in Redhill and in line with the Core Strategy.	No		No
RTC5	Former Longmead Centre, Redhill: Potential mixed use development including up to 20 residential units in Redhill town centre	None. Site is approx. 2.4km from the Mole Gap to Reigate Escarpment SAC. Site is in excess of 18 miles by road from the Ashdown Forest. Potential scale of development is small in comparison with existing residential development in Redhill and in line with the Core Strategy.	No		No
RTC6	Gloucester Road, Redhill: Potential mixed use development including up to 60 residential units in Redhill town centre or up to 4,000sqm of office floorspace	None. Site is approx. 2.4km from the Mole Gap to Reigate Escarpment SAC. Site is in excess of 18 miles by road from the Ashdown Forest. Potential scale of development is small in comparison with existing residential and commercial development in Redhill and in line with the Core Strategy.	No		No

RED1	Quarryside Business Park, Merstham: Potential residential development of up to 60 units in Redhill/Merstham	None. Site is approx. 2.9km from the Mole Gap to Reigate Escarpment SAC. Site is in excess of 18 miles by road from the Ashdown Forest. Potential scale of development is small in comparison with existing residential development in Redhill / Merstham and in line with the Core Strategy	No	Proposed DMP policies seek to secure the implementation of mitigation measures, including DES1 (General design, including GI provision), TAP1 (encouraging sustainable transport measures), NHE2 (biodiversity, making it clear that development that is likely to have a detrimental impact on Natura 2000 sites will not be permitted), and NHE4 (Green infrastructure). Core Strategy policy requires proposals for development that is likely to have a significant effect on the Mole Gap to Reigate Escarpment SAC to demonstrate that it will not adversely affect the integrity of the site.	No
RED2	Depot and Bellway House, Merstham: Potential residential development of up to 30 units in Merstham	None. Site is approx. 3.3km from the Mole Gap to Reigate Escarpment SAC. Site is in excess of 18 miles by road from the Ashdown Forest. Potential scale of development is small in comparison with existing residential development in Merstham and in line with the Core Strategy	No		No
RED4	Church of the Epiphany, Merstham: Potential residential development of up to 10 units in Merstham	None. Site is approx. 3.4km from the Mole Gap to Reigate Escarpment SAC. Site is in excess of 18 miles by road from the Ashdown Forest. Potential scale of development is small in comparison with existing residential development in Merstham and in line with the Core Strategy.	No		No
RED5	Merstham Library: Potential residential development of up to 10 units in Merstham and/or community use	None. Site is approx. 3.7km from the Mole Gap to Reigate Escarpment SAC. Site is in excess of 18 miles by road from the Ashdown Forest. Potential scale of development is small in comparison with existing residential development in Merstham and in line with the Core Strategy.	No		No
RED6	Oakley Centre : Potential residential development of up to 30 units in Merstham	None. Site is approx. 3.7km from the Mole Gap to Reigate Escarpment SAC. Site is in excess of 18 miles by road from the Ashdown Forest. Potential scale of development is small in comparison with existing residential development in Merstham and in line with the Core Strategy	No		Np
RED7	Redhill Law Courts: Potential educational facility (primary school) between Redhill and Reigate	None. Site is approx. 1.85ha from the Mole Gap to Reigate Escarpment SAC. Site is in excess of 18 miles by road from the Ashdown Forest . Potential scale of development is small in comparison with existing development in Redhill/Reigate, would serve local needs, and is and in line with the Core Strategy.	No		No
RED8	Reading Arch Road, Redhill: Potential mixed use development including up to 150 residential units in proximity to Redhill town centre, along with approx. 4,000sqm of bulky goods retailing.	None. Site is approx. 2.4km from the Mole Gap to Reigate Escarpment SAC. Site is in excess of 18 miles by road from the Ashdown Forest Potential scale of development is small in comparison with existing residential and commercial development in Redhill and in line with the Core Strategy. Commercial development would be of a scale to serve the local, rather than sub-regional, market.	No		No
ERM1	Land at Hillsbrow, Redhill: Potential development of approx. 100 dwellings in Redhill	None. Site is approx. 3.1km from the Mole Gap to Reigate Escarpment SAC. Site is approximately 18 miles by road from the Ashdown Forest Potential scale of development is small in comparison with existing residential development in Redhill and in line with the Core Strategy. Site is separated from the Mole Gap to Reigate Escarpment SAC by the Redhill/Reigate conurbation.	No		Proposed DMP policies seek to secure the implementation of mitigation measures, including DES1 (General design, including GI provision), TAP1 (encouraging sustainable transport measures), NHE2 (biodiversity, making it clear that development that is likely to have a detrimental impact on Natura 2000 sites will not be permitted), and NHE4 (Green and blue infrastructure).
ERM2/ERM3	Land at Copyhold and west of Copyhold, Redhill: Potential development of approx. 210 dwellings in Redhill, along with land for a new primary school and new public open space	None. Site is approx. 3.2km from the Mole Gap to Reigate Escarpment SAC. Site is approximately 18 miles by road from the Ashdown Forest. Potential scale of development is small in comparison with existing residential development in Redhill and in line with the Core Strategy. Site is separated from the Mole Gap to Reigate Escarpment SAC by the Redhill/Reigate conurbation.	No	Proposed design and mitigation measures include local (site specific) green infrastructure enhancements. Core Strategy policy requires proposals for development that is likely to have a significant effect on the Mole Gap to Reigate Escarpment SAC to demonstrate that it will not adversely affect the integrity of the site.	No
ERM4a/b	Land south of Bletchingley Road: Potential development of approx. 50 dwellings in Merstham.	None. Site is approx. 4.3km from the Mole Gap to Reigate Escarpment SAC. Site is over 18 miles by road from the Ashdown Forest. Potential scale of development is small in comparison with existing residential development in Merstham and in line with the Core Strategy. Site is separated from the Mole Gap to Reigate Escarpment SAC by the rest of Merstham and countryside at Gatton.	No	Proposed DMP policies seek to secure the implementation of mitigation measures, including DES1 (General design, including GI provision), TAP1 (encouraging sustainable transport measures) NHE2 (biodiversity, making it clear that development that is likely to have a detrimental impact on Natura 2000 sites will not be permitted), and NHE4 (Green and blue infrastructure).	No
ERM5	Oakley Farm, Merstham: Potential development of approx. 95 dwellings in Merstham, along with small business space and new public open space.	None. Site is approx. 4.4km from the Mole Gap to Reigate Escarpment SAC. Site is over 18 miles by road from the Ashdown Forest. Potential scale of development is small in comparison with existing residential development in Merstham and in line with the Core Strategy. Site is separated from the Mole Gap to Reigate Escarpment SAC by the rest of Merstham	No	Proposed design and mitigation measures include local green infrastructure enhancements. Core Strategy policy requires proposals for development that is likely to have a significant effect on the Mole Gap to Reigate Escarpment SAC to demonstrate that it will not adversely affect the integrity of the site.	No

		and countryside at Gatton.			
<b>Area 2b: Reigate</b>					
REI1	Bancroft Road, Reigate: Opportunity area with the potential for mixed use development including approx. 25 residential units in Reigate along with up to 1,000sqm or retail, commercial, leisure or community development	None. Site is approx. 1.6km from the Mole Gap to Reigate Escarpment SAC. Site is over 19 miles by road from the Ashdown Forest SAC. Potential scale of development is small in comparison with existing residential, community and commercial development in Reigate and in line with the Core Strategy.	No	Proposed DMP policies seek to secure the implementation of mitigation measures, including DES1 (General design, including GI provision), TAP1 (encouraging sustainable transport measures), NHE2 (biodiversity, making it clear that development that is likely to have a detrimental impact on Natura 2000 sites will not be permitted), and NHE4 (Green infrastructure). Core Strategy policy requires proposals for development that is likely to have a significant effect on the Mole Gap to Reigate Escarpment SAC to demonstrate that it will not adversely affect the integrity of the site.	No
REI2	Land adjacent to Town Hall, Reigate: Potential mixed use development including approx. 25 residential units in Reigate and 1000sqm of offices; or 1,500sqm of office development (with no residential)	None. Site is approx. 1.3km from the Mole Gap to Reigate Escarpment SAC. Site is over 19 miles by road from the Ashdown Forest SAC. Potential scale of development is small in comparison with existing residential / commercial development in Reigate and in line with the Core Strategy.	No		No
REI3	Albert Road North, Reigate: Opportunity area with potential for mixed use development of replacement employment floorspace and up to 50 residential units in Reigate	None. Site is located just of 800m from the Mole Gap to Reigate Escarpment SAC, separated from the SAC by the railway line, low density residential development and Green Belt. The site is already in commercial and industrial use, and no increase in employment floorspace is envisaged. The potential scale of residential development is small in comparison with existing residential development in Reigate and is in line with the Core Strategy. Recreational impact would be limited as there is no easy direct access to the SAC. Redevelopment in this area would not obviously disrupt bat flight lines to foraging /roosting areas. The site is over 19 miles by road from the Ashdown Forest SAC.	No		Supporting policy identifies the need for any future development to include measures to avoid impact on the SAC. Proposed DMP policies seek to secure the implementation of mitigation measures, including DES1 (General design, including GI provision), TAP1 (encouraging sustainable transport measures), NHE2 (biodiversity, making it clear that development that is likely to have a detrimental impact on the SAC will not be permitted), and NHE4 (Green and blue infrastructure). Core Strategy policy requires proposals for development that is likely to have a significant effect on the Mole Gap to Reigate Escarpment SAC to demonstrate that it will not adversely affect the integrity of the site.
SSW2	Land at Sandcross Lane: Potential development of approx. 260 dwellings in Reigate along with small scale commercial/retail development, land for a new health facility and public open space.	None. Site is approx. 3km from the Mole Gap to Reigate Escarpment SAC and approx.18 miles by road from the Ashdown Forest SAC. Potential scale of development is small in comparison with existing residential and commercial development in Reigate and in line with the Core Strategy. Site is separated from the Mole Gap to Reigate Escarpment SAC by the rest of Reigate.	No	Proposed DMP policies seek to secure the implementation of mitigation measures, including DES1 (General design, including GI provision), TAP1 (encouraging sustainable transport measures), NHE2 (biodiversity, making it clear that development that is likely to have a detrimental impact on the SAC will not be permitted), and NHE4 (Green and blue infrastructure). Proposed design and mitigation measures include local green infrastructure enhancements. Core Strategy policy requires proposals for development that is likely to have a significant effect on the Mole Gap to Reigate Escarpment SAC to demonstrate that it will not adversely affect the integrity of the site.	No
SSW6/7	Potential development of approx. 30 dwellings in Reigate.	None. Site is approx. 3.8km from the Mole Gap to Reigate Escarpment SAC and approx.18 miles by road from the Ashdown Forest SAC.. Potential scale of development is small in comparison with existing residential development in Reigate and in line with the Core Strategy. Site is separated from the Mole Gap to Reigate Escarpment SAC by the rest of Reigate.	No		No
SSW9	Potential development of approx. 100 dwellings in Reigate.	None. Site is approx. 3.8km from the Mole Gap to Reigate Escarpment SAC and approx.18 miles by road from the Ashdown Forest SAC.. Potential scale of development is small in comparison with existing residential development in Reigate and in line with the Core Strategy. Site is separated from the Mole Gap to Reigate Escarpment SAC by the rest of Reigate.	No		No
<b>Area 3: The Low Weald</b>					
G3	Woodlea Stables, Horley: Up to 4 traveller pitches	This would represent authorisation of a currently unauthorised site. Site is over 10km from the Mole Gap to Reigate Escarpment SAC and approx. 15km from the Ashdown Forest SAC. On the basis of the distance from sites and the scale of development proposed above baseline, the development would have negligible impact on Natura 2000 sites.	No	Proposed DMP policies seek to secure the implementation of mitigation measures, including DES1 (General design, including GI provision), TAP1 (encouraging sustainable transport measures), NHE2 (biodiversity, making it clear that development that is likely to have a detrimental impact on Natura 2000 sites will not be permitted), and NHE4 (Green infrastructure). Core Strategy policy requires proposals for development that is likely to have a significant effect on the Mole Gap to Reigate Escarpment SAC to demonstrate that it will not adversely affect the integrity of the site.	No
G4	Treetops/Trentham, Horley Up to 2 traveller pitches	This would represent authorisation of a currently unauthorised site. Site is over 10km from the Mole Gap to Reigate Escarpment SAC and approx. 15km from the Ashdown Forest SAC. On the basis of the distance from sites and the scale of development proposed above baseline, the development would have negligible impact on Natura 2000 sites.	No		No

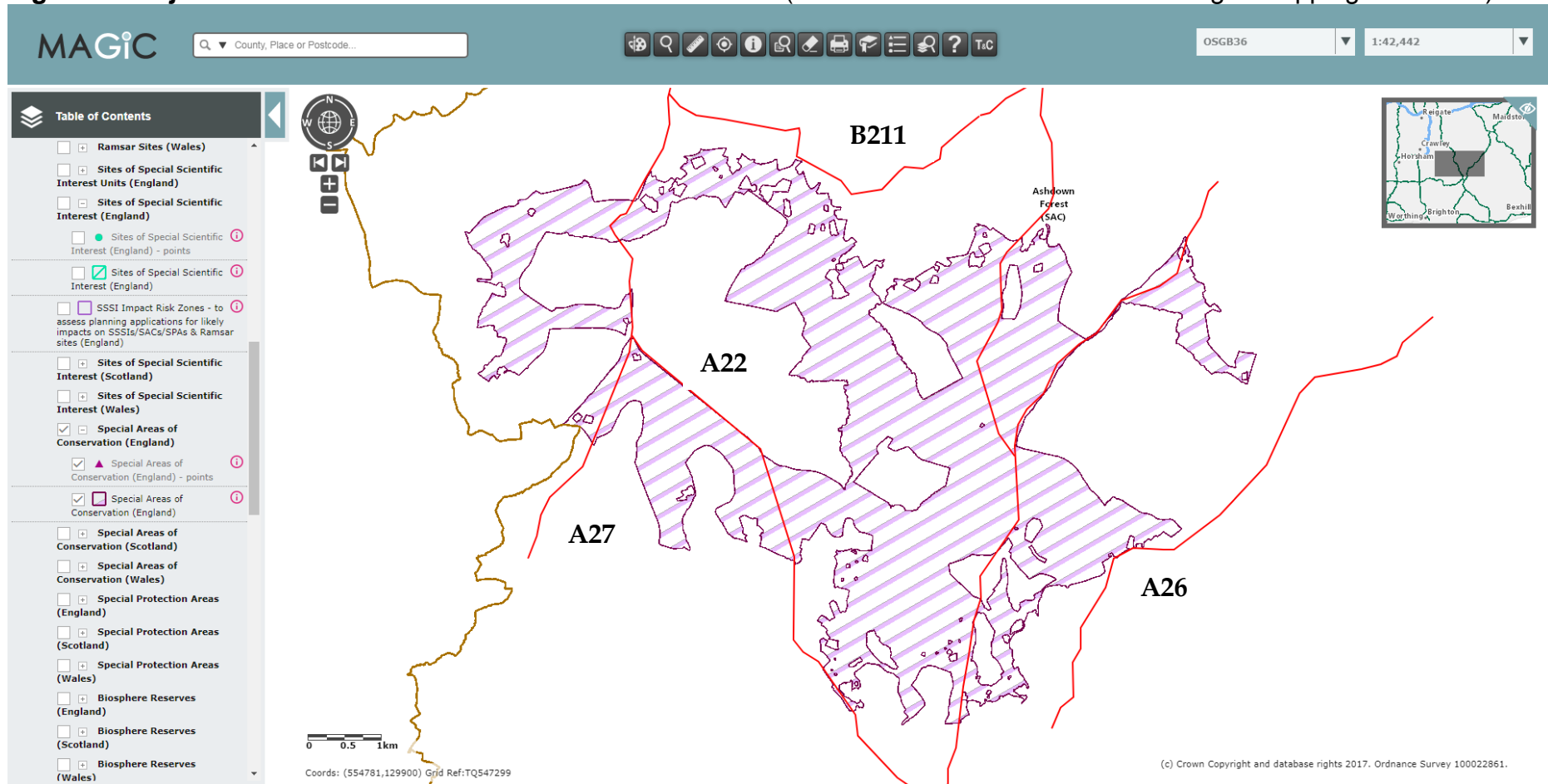
G9	Land at Fairacres, Salfords Up to 5 plots for travelling showpeople	Site would be approximately 6.5km from the Mole Gap to Reigate Escarpment SAC and around 15 miles by road from the Ashdown Forest SAC. The scale of development proposed is small in comparison with existing residential development in the area and impact on Natura 2000 sites would be negligible.	No		No	
HOR1	High Street Car Park, Horley: Potential mixed use development including up to 30 residential units and up to 1000sqm of retail / leisure uses in Horley.	None. Site is approx. 9.5km from the Mole Gap to Reigate Escarpment SAC and over 13 miles by road from the Ashdown Forest SAC. Potential scale of development is small in comparison with existing residential and commercial development in Horley and in line with the Core Strategy.	No	Proposed DMP policies seek to secure the implementation of mitigation measures, including DES1 (General design, including GI provision), TAP1 (encouraging sustainable transport measures), NHE2 (biodiversity, making it clear that development that is likely to have a detrimental impact on the SAC will not be permitted), and NHE4 (Green and blue infrastructure). Core Strategy policy requires proposals for development that is likely to have a significant effect on the Mole Gap to Reigate Escarpment SAC to demonstrate that it will not adversely affect the integrity of the site	No	
HOR3	Horley Police Station: Potential for up to 20 residential units in Horley.	None. Site is approx. 9.5km from the Mole Gap to Reigate Escarpment SAC and over 13 miles by road from the Ashdown Forest SAC.. Potential scale of development is small in comparison with existing residential development in Horley and in line with the Core Strategy.	No		No	
HOR5	Horley Library: Potential for up to 35 residential units in Horley.	None. Site is approx. 9.5km from the Mole Gap to Reigate Escarpment SAC and around 13 miles by road from the Ashdown Forest SAC.. Potential scale of development is small in comparison with existing residential development in Horley and in line with the Core Strategy.	No		No	
HOR6	50-66 Victoria Road, Horley: Opportunity site for potential mixed use development including up to 25 residential units and 750sqm new retail / leisure floorspace in Horley.	None. Site is approx. 9.5km from the Mole Gap to Reigate Escarpment SAC and around 13 miles by road from the Ashdown Forest SAC.. Potential scale of development is small in comparison with existing residential and retail development in Horley and in line with the Core Strategy.	No		No	
HOR7	Horley Telephone Exchange: Opportunity site for potential mixed use development including up to 30 residential units and new community uses in Horley.	None. Site is approx. 9. from the Mole Gap to Reigate Escarpment SAC and around 13 miles by road from the Ashdown Forest SAC.. Potential scale of development is small in comparison with existing residential and community development in Horley and in line with the Core Strategy.	No		No	
HOR8	Former Chequers Hotel, Horley: Potential for up to 45 residential units in Horley	None. Site is approx. 8.2km from the Mole Gap to Reigate Escarpment SAC and over 14 miles by road from the Ashdown Forest SAC.. Potential scale of development is small in comparison with existing residential development in Horley and in line with the Core Strategy.	No		No	
NWH1	Land at Meath Green Lane, Horley: Potential for approx. 75 residential units in Horley	None. Site is approx. 7km from the Mole Gap to Reigate Escarpment SAC and over 13 miles by road from the Ashdown Forest SAC. Potential scale of development is small in comparison with existing residential development in Horley and in line with the Core Strategy.	No		Proposed DMP policies seek to secure the implementation of mitigation measures, including DES1 (General design, including GI provision), , TAP1 (encouraging sustainable transport measures),NHE2 (biodiversity, making it clear that development that is likely to have a detrimental impact on the SAC will not be permitted), and NHE4 (Green infrastructure). Proposed design and mitigation measures include local green infrastructure enhancements. Core Strategy policy requires proposals for development that is likely to have a significant effect on the Mole Gap to Reigate Escarpment SAC to demonstrate that it will not adversely affect the integrity of the site.	No
NWH2	Land at Bonehurst Road, Horley: Potential for approx. 40 residential units in Horley	None. Site is approx. 7.6km from the Mole Gap to Reigate Escarpment SAC and over 13 miles by road from the Ashdown Forest SAC. Potential scale of development is small in comparison with existing residential development in Horley and in line with the Core Strategy.	No			No
SEH4	Land at the Close and Haroldslea Drive, Horley: Potential for approx. 70 residential units in Horley	None. Site is approx. 10.2km from the Mole Gap to Reigate Escarpment SAC and 20km by road from the Ashdown Forest SAC (13.5km as the crow flies). Potential scale of development is small in comparison with existing residential development in Horley and in line with the Core Strategy.	No	No		
HOR9	Potential for new employment provision of up to 220,000sqm of business space and new public open space	See also Annex 5. Site is around 10km as the crow flies from the Mole Gap to Reigate Escarpment SAC. Given distance from the site, and proposed provision on 'on-site' public park, the development would not have a recreational impact on the site, nor would it impact via cessation of grazing or disturbance to roostings. Site is around 12.5 miles by road from the Ashdown Forest SAC. Any increase in road traffic in the vicinity of the Ashdown Forest would be marginal in comparison with baseline levels.	No	Proposed DMP policies seek to secure the implementation of mitigation measures, including DES1 (General design, including GI provision), TAP1 (encouraging sustainable transport measures), NHE2 (biodiversity, making it clear that development that is likely to have a detrimental impact on the SAC will not be permitted), and NHE4 (Green infrastructure). Proposed design and mitigation measures include local green infrastructure enhancements.	No	

## Annex 5: Assessment of likely significant effect of proposed Horley Employment Site on the Ashdown Forest SAC

1. As noted in the main HRA screening report, the Ashdown Forest SAC habitats are sensitive to atmospheric pollution, including pollution derived from traffic movements. It is recognised that in some parts of the Ashdown Forest, critical loads of key pollutants on qualifying habitats are being exceeded.
2. In order to understand whether the Horley Employment Site allocation is likely (alone or in combination) to have a significant effect on the Ashdown Forest SAC, information has been obtained from transport modelling prepared in support of the DMP in relation to the traffic movements in the vicinity of the SAC that would be generated from the Plan proposals.
3. Information has been obtained for the following routes:
  - A275 (Lewes Road)
  - A22 (Lewes Road)
  - A26 (Uckfield Road)
  - B2110 (Hartfield Road)
4. These are the main routes in the vicinity of the Ashdown Forest which experience the greatest traffic flows. Figure A shows these routes in relation to the SAC.
5. Absolute flows on these routes are not verified within the Surrey County Council model used for the DMP transport modelling, however relative flows are available, and are presented in Figure B (single direction movements) and Figure C (two way flows). In Figure B, comparison is provided between (a) baseline and total planned development; and (b) baseline and total planned development *excluding* the proposed Horley Business Park. Figure C compares baseline movements with those forecast to arise from total planned development.
6. This information suggests that the percentage change in flow along the roads in question marginal compared to the baseline information.
7. Indicative quantification of movements has been obtained by comparing this relative forecast change against baseline flow information (in this case derived from transport modelling and habitats regulations assessment that has been undertaken very recently to inform the Mid Sussex Local Plan) (Figure D).



**Figure A: Major roads in relation to the Ashdown Forest SAC (Source: extracted from DEFRA 'Magic' mapping website ©)**



**Figure B: Relative single direction traffic flows resulting from Development Management Plan proposals (Source: SCC)**

Road No	Road name	Direction	Scenario 1: All development proposals relative to baseline		Scenario 2: All development proposals except Horley Employment Site relative to baseline	
			AM Flow	PM Flow	AM Flow	PM Flow
A275	Lewes Road	Northbound	-0.1%	-0.3%	-0.1%	-0.1%
A275	Lewes Road	Southbound	0.7%	-0.1%	0.1%	0.0%
A22	Lewes Road	Northbound	0.1%	-0.1%	-0.1%	-0.2%
A22	Lewes Road	Southbound	2.8%	-0.2%	0.2%	0.0%
A26	Uckfield Road	Northbound	0.0%	0.2%	0.0%	0.1%
A26	Uckfield Road	Southbound	0.6%	-0.4%	0.3%	0.1%
B2110	Hartfield Road	Eastbound	0.0%	-0.4%	-0.2%	-0.2%
B2110	Hartfield Road	Westbound	0.0%	0.0%	0.0%	0.0%

**Figure C: Relative two-way traffic flows resulting from Development Management Plan proposals (Source: SCC)**

Road No	Road name	All development proposals relative to baseline	
		AM Flow	PM Flow
A275	Lewes Road	-0.1%	-0.3%
A22	Lewes Road	0.1%	-0.1%
A26	Uckfield Road	0.6%	-0.4%
B2110	Hartfield Road	0.0%	-0.4%

**Figure D: Indicative flow differences (Source: SCC and published Mid Sussex HRA 2017)**

Road No	Road name	Two way Annual Average Daily Traffic Flow	All development proposals relative to baseline		Indicative flow differences arising from planned growth over baseline		
			AM Flow	PM Flow	AM Flow	PM Flow	Total (net)
A275	Lewes Road	7107	-0.1%	-0.3%	-7	-21	-28
A22	Lewes Road	6272	0.1%	-0.1%	6	-6	0
A26	Uckfield Road	4483	0.6%	-0.4%	27	-18	9
B2110	Hartfield Road	2247	0.0%	-0.4%	0	-9	-9

8. Nature of movements: Given the relative location of Reigate & Banstead borough to the Ashdown Forest, traffic flow is 'sub-regional' in nature and it is reasonable to assume that the vast majority of movements result from commuting movements. Whilst total daily flows may be slightly above those indicated in Figure D, the scale of additional impact will be minimal. The indicative figures in Figure D are therefore considered appropriate for this assessment.
9. This exercise suggests a marginal increase in traffic flows (at peak times) on the A26, no impact on the A22 and a marginal reduction in flows on the A275 and B2110. Whilst it has not been possible to assess the impact on local distributor roads due to the availability of data, it is reasonable to conclude that if traffic impact on these major routes is minimal, more local routes crossing the area are unlikely to experience substantive increases in traffic flow.
10. Total quantum of growth: It is important to note that – except for the proposed Horley Business Plan – the quantum of growth included within the above assessment has **already been agreed and adopted** through the Council's Core Strategy. The impact of this Core Strategy growth is presented in relative single direction peak period flow information set out in Figure B (scenario 2) and shows only very minor relative impact from Core Strategy planned growth. Figure B (scenario 1) suggests that the greatest relative impact of the Horley Business Park proposal will be felt on the A22 southbound, however Figure D suggests that in combination with other proposals there will be no net impact on the A22.
11. Horley Business Park – avoidance and mitigation: In relation to the Horley Business Park, the forecast traffic movements do not take account of sustainable transport measures to be included as part of the development. The proposed policy HOR9 in relation to the Horley Business Park requires any planning application to demonstrate no severe residual impact on the local or strategic road network, and requires measures to promote modal shift. Increased modal shift towards sustainable transport modes (not private car) will be a requirement of securing agreement of the access to the strategic road network from Highways England (on which the scheme is dependent). The above assessment – insofar as it relates to the impact from the Horley Business Park – is therefore a 'worst case scenario', with early work by the scheme promoters suggesting that a shift in modal split from 50% car usage to 40% car usage by year 10 in the scheme development (anticipated to be around 2030) – resulting in a 20% reduction in total vehicle movements during AM and PM peak hours. DMP policy NHE2 also makes it clear that proposals will only be permitted where it can be demonstrated they will not have an adverse impact on the integrity of a Natura 2000 site and/or that any impacts will be suitably mitigated.
12. Habitat type: An analysis of habitat type suggests that at the A26, habitats closest to the road are woodland and grassland. The nearest extent of heathland habitat (wet heath) is around 100m north west of the A26 between New Road and Chillies Lane.

13. Conclusion: Notwithstanding that a small area of wet heath falls within 200m of the A26 (the zone beyond which road traffic emissions diminish to the equivalent of background levels), the evidence suggests any increase in road traffic on this road (and in the vicinity of the Ashdown Forest SAC more generally) generated by the Horley Business Park will be marginal over and above baseline growth, and that – alone and in combination – the Horley Employment Site allocation will not result in adverse effects on the conservation objectives of the Ashdown Forest SAC.

## Annex 6 – Correspondence from Natural England

**Received email:** 16 November 2017 from Rebecca Ingram

Thank you for sending this through. I've read through the document a couple of times, and discussed further with colleagues. Overall (and specifically with regards to this HRA document) Natural England are unfortunately of the opinion that as it stands this Local Plan is not legally compliant and currently does not meet all of the tests of soundness. I would be more than happy to arrange a meeting or call to discuss the issues (although a call would be preferable as Marc is still tied up with the Bramshill Public Inquiry and on leave for most of December, and I'm on leave for most of January).

We have the following comments to make on the HRA:

- We noticed a reliance on the Core Strategy HRA Screening assessment for impacts on designated sites and associated protected species. This DMP HRA document should be an HRA of what you are currently submitting, and shouldn't centre around previous documents.
- In terms of air pollution, the Core Strategy HRA Screening assessment was pre-Wealden and is not for this Plan document. We also note that for Mole Gap even just for the Core Strategy there will be 'minimal' impacts suggesting that there won't be none. Assessing effects at a local level isn't acceptable - this must be addressed strategically at the Local Plan level to effectively deal with in-combination, particularly in light of the Wealden Judgement. This Plan needs an up-to-date full air quality assessment with traffic modelling to cover all allocated sites.
- We're unsure how the 1km buffer zone was established for Mole Gap - is this something we directly advised? In terms of air quality, this approach isn't appropriate and you will have to take the standard air quality assessment approach to assess impacts on this site. It would be inappropriate to state that since a development sits 1km away it won't have an effect - we would need evidence of this e.g. transport modelling data, as stated above.
- The in-combination assessment cannot simply say that each individual LPA have shown no impact. You will need to use those surrounding authorities' data, together with the data generated from your own plan to ascertain whether you collectively exceed the threshold of 1000 AADT or 1% of critical level/load. If the threshold is exceeded, then a likely significant effect cannot be excluded and an appropriate assessment will be required. This should apply to air quality assessments of all the site allocations.

- It would be useful to establish how you came to screen out Wimbledon Common, Richmond Park and the Thames Basin Heaths on air quality impacts - was this based on the conclusions of the Core Strategy? We note that the Horley site allocation sits at around 14km away from the Ashdown Forest, whereas other site allocations in and around the Banstead area sit around 11-12km away from Wimbledon Common and Richmond Park. It would be helpful to have all of this information clearly laid out and justified in the context of this DMP HRA document.
- We agree that recreational impacts on Mole Gap can be screened out based on the location and scale of the proposed site allocations.

I hope this all makes sense - we'd be more than happy to discuss with you in more detail at a suitable time over the next few weeks.