

Housing and Traveller Sites Plan: Sustainability Appraisal Report

January 2014

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ویب سائٹ: www.molevalley.gov.uk

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ফ্যাক্স: 01306 876821

ইমেইল: alternative.formats@molevalley.gov.uk

ওয়েবসাইট: www.molevalley.gov.uk



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Chapter 1 Executive and Non-Technical Summary

Overview

- 1.1 This overarching Sustainability Appraisal Report (SAR) has been prepared in the context of the consultation on the Housing and Traveller Sites Plan: Consultation 2014. It is not a final SAR to accompany a submission Plan. The report identifies that the assessment and sustainability appraisal of the strategic issues which underpin the Housing and Traveller Sites Plan have already been undertaken for the sustainability appraisal of the Core Strategy Development Plan. The report indicates that no new strategic or significant matters have arisen which would require new appraisal.
- 1.2 The document is one of an audit trail and signposting back to previous sustainability appraisal. The document provides the evidence that the strategic assessment has already been carried out and does not need to be repeated. To do so it has been necessary to evidence the previous work and processes. This is especially with regard to the linkages between the Core Strategy goals and policies. The report sets out that the delivery of the established housing requirement accords with the three strategic reasonable alternatives identified in the Core Strategy SAR. This report also sets out the sustainability appraisal methodology for the broad locations and potential sites for allocation. It has also been necessary to evidence that new baseline information and changes to national policy have not changed the conclusions of previous sustainability appraisal work.
- 1.3 This Report should be read in conjunction with:
 - The Core Strategy Sustainability Appraisal Report 2008 and in particular Appendix 8: Sustainability Appraisal of the Preferred Options.
 - Sustainability Appraisal / Strategic Environmental Assessment Scoping Report 2013.
 - The Housing and Traveller Sites Consultation Document January 2014 and the sustainability appraisals of the broad locations and sites submitted to the Council as potential allocations.

Non-Technical Summary

- 1.4 A non-technical summary will be included in the sustainability appraisal report which will accompany the submission Housing and Traveller Sites Plan.

How to Submit Comments

- 1.5 The Regulations require that statutory environmental bodies are consulted (English Heritage, Natural England and the Environment Agency) and specify minimum time periods for consultation on sustainability appraisal. This SAR accompanies, and is being consulted on, with the Housing and Traveller Sites Consultation Document January 2014.

Statement 1

How can I comment on this Document?

You can give your comments by:

Visiting www.molevalley.gov.uk/localplans and following the link to the page on the Housing and Traveller Sites Plan page. For those people viewing this document on line, please just click on the “Add Comments” tab.

Requesting a comments form and returning it to the Planning Policy Team, Mole Valley District Council, Pippbrook, Dorking Surrey, RH4 1SJ or in person to the Council Offices in Dorking or the Leatherhead HelpShop. (See www.molevalley.gov.uk for opening times).

E-mailing your comments to planning.policy@molevalley.gov.uk

During the consultation period the Council will be holding drop in events where you can talk to Council representatives to find out more about the Plan. [Add further details here and /or on line](#)

Please note that all comments on the consultation document will be made public via the website as soon as possible after they are received. Addresses and other contact details will not be published.

Please submit your comments by Friday 7th March 2014.

Chapter 2 Introduction

The Importance of Sustainability Appraisal

- 2.1 Sustainability Appraisal is a process carried out with the preparation of a Local Plan to assess the extent to which the plan will achieve environmental, economic and social objectives and to make sure the strategy of the plan is the most appropriate given the reasonable alternatives. Sustainability appraisal is the testing of reasonable alternatives and different options and should consider all the likely significant effects of the options of a plan on environmental, economic and social factors. It forms a key part of the preparation of a sound evidence base. There is a requirement to prepare a Sustainability Appraisal Report (SAR) to identify the most appropriate strategy for the plan and set out the reasons why alternative strategies, options or sites were not chosen. It is not appropriate to look at one preferred strategy or option at the outset.
- 2.2 Sustainability appraisal of a plan therefore sets the platform how a plan, with its policies and allocations, will deliver sustainable development in the context most appropriate to the circumstances of a locality.

What is Sustainable Development

- 2.3 Sustainable development is defined by the United Nations as "*meeting the needs of the present without compromising the ability of future generations to meet their own needs.*" The UK Sustainable Development Strategy, *Securing the Future*, set out five 'guiding principles' of sustainable development: living within the planet's environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using sound science responsibly.

Presumption in Favour of Sustainable Development

- 2.4 The purpose of the planning system is to contribute to sustainable development through economic, social and environmental roles. The National Planning Policy Framework (NPPF) emphasises that to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. Planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise. This means the development plan (ie local plan) is the statutory starting point for making decisions.

The Scope of the Housing and Traveller Sites Plan

- 2.5 The issue the Government is most keen for local planning authorities to address is expediting the identification of land for new homes. Associated with this is the provision of additional pitches/plots for Gypsies, Travellers and Travelling Showpeople. Addressing these development requirements is causing the greatest pressure on the Green Belt in the District. The longer it takes to identify sufficient land to meet these requirements the greater the Council's vulnerability to successful appeals against development proposals in the Green Belt and other safeguarded land.
- 2.6 It is recognised that there are other important land allocation issues facing the District, including for example whether more industrial and commercial land is required and the future strategy for Leatherhead town centre. It is considered that these other issues are best addressed through a new Local Plan and in the case of Leatherhead initiated through a non –statutory master plan which can then be fed into the new Local Plan.
- 2.7 The intention of the Housing and Traveller Sites Plan is to deliver the housing requirements of the adopted Core Strategy. The Plan also looks at minor changes to the Green Belt.

Background to the Housing and Traveller Sites Plan

- 2.8** The Council adopted its Core Strategy in October 2009, establishing a strategic approach to new development in the District, including the number of new homes to be planned for up to 2026. It indicated that a Land Allocations Plan would be prepared, allocating housing sites in the built-up area and incorporating a review of the Green Belt boundary in Mole Valley. This would be prepared to ensure sufficient land would be allocated to meet the Core Strategy housing requirements.
- 2.9** The subsequent formation of the coalition government changed the plan making landscape. Regional Spatial Strategies have been abolished and local plans are to be prepared. The National Planning Policy Framework was published in March 2012 with its requirement that local planning authorities make provision for their objectively assessed housing requirements.
- 2.10** In February 2013 the Council's Executive considered whether a Land Allocations Plan should be prepared or whether an entirely new Local Plan should be drawn up. It decided to proceed with the preparation of a Land Allocations Plan that would identify sites for the development proposed in the Core Strategy and that parallel work should commence on the preparation of a new Local Plan to cover the longer term. The intention of the Land Allocations Plan was to concentrate on the delivery of land meeting the Core Strategy housing requirements and the need to identify additional pitches/plots for Travellers and Travelling Showpeople, hence the re-naming as the Housing and Traveller Sites Plan.

Traveller Sites

- 2.11** The requirement for local planning authorities to assess and plan for new pitches and plots in their Local Plan is set by the Government in its Planning Policy for Traveller Sites (March 2012). It states that local planning authorities should carry out this work when producing their Local Plan. It includes the requirement to identify and update annually, a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15. In this regard the assessment of the identification of traveller sites broadly follows that for identifying land for housing.

Scope and Purpose of this Sustainability Appraisal Report

- 2.12** The main sustainability appraisal work of the Housing and Traveller Sites Plan is the review of the sites considered for allocation. This is location or site specific rather than strategic in scope and has been carried out as part of the site assessment work.
- 2.13** The Council believes it is unnecessary to carry out further sustainability appraisal on the principle of looking at the release of Green Belt land or the strategic location of such releases as this was undertaken for the preparation of the Core Strategy in appraising the reasonable alternatives.
- 2.14** However the Council needs to show that the principles of meeting the requirements of the EU Directive for Strategic Environmental Assessment (SEA) have been met for the new Plan. To achieve this the Council has carried out an auditing/"signposting" exercise rather than a detailed appraisal report. This exercise identifies where the strategic matters integral with the new Plan have previously been assessed in the Core Strategy SAR. This was the approach undertaken for the Dorking Town Area Action Plan and was found to be "sound".

The Rationale for this Approach

- 2.15** The Council is required to ensure that sustainable development is promoted throughout a plan's preparation, ensuring the sustainability objectives relating to environmental, social and economic issues are considered, and in this instance, that sites allocated for development are the most appropriate. The

Council is required to prepare a Sustainability Appraisal Report (SAR) which encompasses Strategic Environmental Assessment (SEA) and must show how the Council has complied with the requirements for completing a sustainability appraisal

- 2.16** The Housing and Traveller Sites Plan does not introduce any new strategic policies, alternatives or options. It is a "daughter" document of the Core Strategy and the strategic principles of this Plan have been considered through the Core Strategy SAR.
- 2.17** The Core Strategy SAR set out 3 reasonable strategic alternatives to deliver the housing requirements and other objectives of the Core Strategy. The SAR concluded it may be necessary for all 3 strategic reasonable alternatives to be incorporated in order to ensure delivery of requirements. Two of these alternatives would require greenfield land and a review of the Green Belt to identify such land.
- 2.18** Government advice stipulates that assessments should be proportionate and should not repeat policy assessment which has already been undertaken (NPPF para 167). However the Plan must still comply with the European Directive on strategic environmental assessment. The NPPF practice guidance states that SA/SEA should focus on the impacts which are likely to be significant and do not need to be done in any more detail, or using more resources, than is considered appropriate.
- 2.19** The Council has therefore addressed the sustainability issues of the reasonable alternative spatial strategies through the Core Strategy SAR and this does not, in principle, need to be repeated. However in order to be robust this report provides a "signposting" or audit trail of where this work was undertaken in the Core Strategy SAR. This report also assesses whether there are any new issues arising of a strategic nature which would require the Core Strategy SAR to be updated.
- 2.20** This approach avoids unnecessary duplication of appraisal, especially as it is believed the Housing and Traveller Sites Plan does not introduce any new strategically significant environmental, social or economic matters. The emphasis of the sustainability appraisal process has therefore been the assessment the sites which are proposed to be allocated for development.
- 2.21** This approach was undertaken for the Dorking Town Area Action Plan. The statutory environmental bodies (Environment Agency, English Nature and English Heritage), which were consulted, did not indicate this approach was inappropriate for the Action Plan.
- 2.22** The intention of this SAR is to ensure it is clear how the strategic reasonable alternatives have already been addressed and how the Council has complied with the EU Directive. The focus of the current sustainability appraisal work, is to review the Green Belt and the consideration of sites. This is an assessment of alternative sites and not strategic matters which require a formal SAR.

Site Assessments

- 2.23** The Core Strategy considered that the strategic disposition of new development in the Green Belt should be related to the main settlements. Whilst the size and location of sites under consideration are not strategic, it is necessary to have a sound and robust methodology for site selection and to consider the environment impacts of allocating sites. This assessment process has been broadened to consider the social and economic impacts as well. Consequently the sites and broad areas have been subject to a sustainability appraisal process using a "cut down" suite of sustainability objectives. By including environmental objectives the principles of the EU Directive are also addressed.

What Does This SAR Cover?

- 2.24** This SAR ensures that the legal requirements to undertake SA/SEA have been complied with; summarises the relationship of this Plan with the Core Strategy; uses the Scoping Report to consider what has changed since the Core Strategy SAR, and re-evaluates the Core Strategy SAR. It summarises where the work has been undertaken to comply with the EU Directive and summarises the site assessment process. Finally it screens out the minor green belt revisions and comments on the sustainability appraisal work of the neighbourhood plans in the District.
- 2.25** This is a draft SAR document which accompanies the consultation on the Housing and Traveller Sites Plan. It is not a complete document and will be revised and updated to accompany the submission Plan.

Scoping Report 2013

- 2.26** The Council has published an SA/SEA Scoping Report (2013). It identifies the relevant plans, policies and strategies which impact plan preparation and identifies sustainability issues which should be considered; updates the sustainability baseline information; and sets out a revised suite of sustainability objectives to be used for the appraisal of alternative strategies, options or policies as appropriate. The Scoping Report has addressed this comprehensively for all sustainability themes and topics and is suitable as the basis for future Sustainability Appraisal Reports as appropriate.

Consultation

- 2.27** This SAR is being published alongside the Housing and Traveller Sites Consultation Document January 2014. It is subject to separate regulations which require consultation for a minimum period of 6 weeks and for the 3 statutory environmental bodies (Environment Agency, English Nature and English Heritage) to be specifically consulted and their views sought. Those persons being consulted on the Plan will also be consulted on this SAR.

Chapter 3 The Legal Requirement to Undertake Sustainability Appraisal

What The European Directive Requires

- 3.1 The European Directive 2001/42/EC “on the assessment of the effects of certain plans and programmes on the environment” (known as the Strategic Environmental Assessment or SEA Directive) was transposed into UK law by way of The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004 No.1633). The European Directive requires the undertaking of strategic environmental assessment (SEA) of certain plans, programmes and policies. In the United Kingdom this process has been integrated with the requirement to carry out the sustainability appraisal of plans.
- 3.2 SEA looks at environmental considerations relevant to the plan in question. Sustainability appraisal broadens this to examine social and economic matters. The government considers that by undertaking sustainability appraisal of development plans that local authorities have complied with the requirement to undertake SEA as well.
- 3.3 The EU Directive states that its objective is “to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development”. It requires that environmental (i.e. sustainability appraisal) reports should be prepared in which the likely significant effects on the environment of implementing the plan, and reasonable alternatives, and geographical scope are identified, described and evaluated. The report should include information which is reasonably required taking into account the content and level of details and the extent to which certain matters are more appropriately assessed at different levels in the process in order to avoid duplication of that assessment.
- 3.4 The SEA Directive sets out the required information which must be in an environmental report, specifically:
- (a) An outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes
 - (b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme
 - (c) The environmental characteristics of areas likely to be significantly affected
 - (d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC
 - (e) The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation
 - (f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors
 - (g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme
 - (h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information
 - (i) A description of the measures envisaged concerning monitoring in accordance with Article 10
 - (j) A non-technical summary.

The Legal Requirement to Undertake Sustainability Appraisal

What the Regulations Require and What the NPPF and Practice Guidance Says

- 3.5 The Regulations state that an environmental report must identify, describe and evaluate the likely significant effects on the environment of implementing the Local Plan policies and of the reasonable alternatives taking into account the objectives and geographical scope of the Local Plan.
- 3.6 The NPPF requires that plans are positively prepared and meet the principles of sustainable development. The NPPF maintains the requirement to produce a sustainability appraisal report for all plans. However it re-iterates that assessments should be proportionate and should not repeat policy assessment which has already been undertaken. The NPPF practice guidance comments that the role of sustainability appraisal is to consider ways in which the plan can contribute to improvements in environmental, social and economic conditions as well as identifying and mitigating any potential adverse effects that the plan might otherwise have. By doing so it can help make sure that the proposals (and in this instance sites) in the plan are the most appropriate given reasonable alternatives.

The Assessment of Reasonable Alternatives

- 3.7 The NPPF practice guidance indicates that reasonable alternatives are the different realistic options considered in developing the policies in a draft plan. They must be sufficiently distinct to highlight the different sustainability implications so that meaningful comparisons can be made. The alternatives must be realistic and deliverable. The implications of not having such clear alternatives, or concentrating on a preferred alternative at the outset, have resulted in legal challenges to plans. In this regard the consideration of alternative strategies forms part of the "Justified" soundness test of a plan.
- 3.8 The Council considers that the broad areas and possible sites, in the context of the geographical areas within the administrative and plan boundary, are not strategic.
- 3.9 The NPPF states with regard to examining plans that the plan is "Justified" when considered against the reasonable alternatives; based on proportionate evidence. The Core Strategy incorporates elements of all three 3 reasonable alternatives and the Housing and Travellers Sites Plan seeks to implement this.
- 3.10 Sustainability appraisal is most useful when the implications of "reasonable alternatives" can be assessed. The appraisal process can tell the story behind a plan's preparation. In effect the sustainability appraisal of the Core Strategy already tells the story of how the Council has got to the stage of preparing the current Housing and Travellers Sites Plan.

Other Matters

- 3.11 When examining plans the Planning Inspectorate will need to know whether the plan has been subject to appraisal; whether a final SAR has been prepared and whether it shows how the different options perform; and how sustainability considerations have informed the plan from the outset. Provisions for monitoring will also need to be set out.

Consultation

- 3.12 The Regulations require that statutory environmental bodies are consulted (English Heritage, Natural England and the Environment Agency) at various stages including consultation on Scoping Reports and with the publication of SARs to accompany a Local Plan. The regulations specify minimum time periods for consultation and that Councils should consider which other consultation bodies should be consulted.

Chapter 4 Summary of the Plan and its Relationship to the Core Strategy

Plan Preparation In Mole Valley

- 4.1 The Council has an adopted Core Strategy which sets out the key elements of the spatial planning framework for Mole Valley District. The Core Strategy was adopted in October 2009 and includes a vision, strategic objectives and over-arching policies for how the District is expected to evolve over the period to 2026.
- 4.2 Following the adoption of the Core Strategy the Council started to prepare its 'daughter' documents. This included the Land Allocations Plan and the Dorking Town Area Action Plan. The purpose of the Land Allocations document was to allocate specific sites for development, in accordance with the strategy set out in the Core Strategy. In February 2010 the Council published a 'Land Allocations DPD: Discussion Paper' which formed part of the early discussions with communities and other interested parties. A Sustainability Appraisal Scoping Report accompanied this work.
- 4.3 However, work on the Land Allocations Plan was paused in the light of the changes to plan making introduced by the coalition government after its formation in May 2010. In this interim period the Council focused on completing the Dorking Town Area Action Plan.
- 4.4 Following the publication of the National Planning Policy Framework (NPPF) in March 2012 the Council has been considering the way forward in terms of plan preparation. It has become evident that there is a need to expedite the preparation of a Housing and Travellers Sites Plan in order to retain 'control' over where development in the District is directed in the short term. In the longer term there is a need to prepare a new Local Plan. Such a new Local Plan would set out priorities and policies for development including establishing a new housing target and a wide range of other policy and development matters (such as business, infrastructure, health, community facilities and services, and the environment) in accordance with the NPPF and in co-operation with other relevant Authorities. This will take a considerable period of time.
- 4.5 The Council is therefore progressing rapidly with the preparation of a Plan which will allocate land for development in accordance with the Core Strategy whilst commencing the preparation of a new Local Plan for the District in accordance with the National Planning Policy Framework (NPPF). A number of Neighbourhood Development Plans (NDP) area also being prepared.

The Scope of the Housing and Traveller Sites Plan

- 4.6 The delivery of land for housing is the issue the Government is most keen for local planning authorities to address and is causing the greatest pressure on the Green Belt in the District. The development requirements that the Council needs to address as a matter of urgency are the provision of new homes and pitches / plots for Travellers and Travelling Showpeople. The longer it takes to identify sufficient land to meet these requirements the greater the Council's vulnerability to successful appeals against development proposals in the Green Belt and other safeguarded land.

Work on the Plan Prior to Consultation

- 4.7 The Green Belt Boundary Review was consulted on during February / March 2013 and the results have been analysed and responses drafted. The consultation responses and the Council's comments will be contained in a background document to accompany the Housing and Traveller Sites Plan.

Summary of the Plan and its Relationship to the Core Strategy

- 4.8 Over 80 sites in the Green Belt have been submitted by land owners and developers for allocation in the Plan. Those sites which abut the main built-up areas or larger rural villages and meet the locational requirements of the Core Strategy have been appraised and subjected to a sustainability appraisal. Other sites in the Green Belt which are not compliant with the Core Strategy have not been appraised.
- 4.9 A call for Traveller sites has been undertaken but has failed to yield any.
- 4.10 Informal meetings have been held with local Councillors and representatives of organisations in Leatherhead, Fetcham, Dorking and the larger rural villages which are inset from the Green Belt to explain the background and context to the Plan and the process of its preparation. The sites that have been submitted for the Council's consideration have been shared with these groups to get their initial views and to act as a check on the Council's initial conclusions about the sites. A further meeting was held with the Leatherhead groups to discuss the Leatherhead allotments / By Pass site which was not included in the first round of discussion as the Council had not made a decision on its preferred partner at the time of the meeting.
- 4.11 An initial meeting has been held with developers and land owners to explain the work that has been carried out so far, what additional information they need to provide and how they need to engage in the plan making process going forward.
- 4.12 There has been close liaison with Surrey County Council on the traffic implications of the options for new housing sites. This has included modelling work and development control highway matters. The County Council Schools Planning Team have been considering the impact of new housing sites on education facilities whilst the Surrey Wildlife Trust is providing biodiversity advice on the suggested sites.
- 4.13 On going support has been given to the groups preparing the Neighbourhood Development Plans (NDPs), including a meeting with the Planning Minister and CLG civil servants to ascertain out how to "stitch together" the Housing and Traveller Sites Plan and the NDPs.

Content of the Housing and Traveller Sites Plan

- 4.14 The Council is undertaking consultation on the following proposed content of a draft plan:
- Background; context; housing requirement; elements of supply. This is to be explained in the form of frequently asked questions and answers, such as "Why is the Council proposing that new homes are built on the Green Belt?" and "How much land is required to be excluded from the Green Belt?"
 - The revised Green Belt Boundary Review is published as a background document but the consultation document explains the key outcomes of the review and how that has been fed into the site appraisal work. The consultation document also refers to a background document that summarises all the comments that were received about the Green Belt Boundary Review Consultation Document and the proposed response by the Council.
 - Minor alterations to the Green Belt Boundary to address anomalies and inconsistencies.
 - Details of all the sites that have been assessed including an estimated capacity of each one and a summary of the key issues that each site raises together with a map to show context and location. Further detailed information on site appraisals are in a supporting document. It is not proposed to indicate whether a site should be allocated or eliminated at this stage although the summary of issues will enable the reader to see which sites have the greater development potential.

Summary of the Plan and its Relationship to the Core Strategy

- Explain that the sites, which have been promoted in the areas covered by NDP's, will be assessed by the Council after the Neighbourhood Forums have consulted on them and provided the Council with their recommendations. These will be assessed by the Council in 2014 along with the sites that have been promoted to the Council. Those sites which are considered to have the greatest development potential will be included in the draft Housing and Traveller Sites Plan.

The Relationship to the Core Strategy

- 4.15 It is important to emphasise that the consultation Plan is seeking to deliver the housing requirements and spatial strategy of the adopted Core Strategy together with making provision for Traveller sites. It is a delivery strategy document.
- 4.16 The Core Strategy's Spatial Strategy identified the most sustainable areas of the District towards which the majority of development will be directed. The spatial strategy has been subject to sustainability appraisal work throughout the preparation of the Core Strategy and the final SAR.
- 4.17 The Core Strategy SAR set out 3 reasonable strategic alternatives to deliver the housing requirements and other objectives of the Core Strategy. These alternatives are:
- **Alternative 1 - Concentration:** make provision for new development only on previously developed land within existing built-up areas.
 - **Alternative 2 - Expansion:** make provision for new development on greenfield sites on the edge of the main built-up areas (Dorking, Leatherhead, Ashted, Fetcham and Bookham).
 - **Alternative 3 - Dispersal of expansion:** Make provision for new development on greenfield sites on the edge of larger rural villages as well as on the edge of main built-up areas.
- 4.18 These alternatives were tested against a suite of sustainability objectives. The conclusion of the Core Strategy SAR was that it may be necessary for all 3 strategic reasonable alternatives to be incorporated in the policy approach of the Core Strategy in order to ensure delivery of requirements. Two of these alternatives would require greenfield land and a review of the Green Belt to identify such land.
- 4.19 The Core Strategy is therefore explicit in acknowledging the need for a review of the Green Belt should there be insufficient land.
- 4.20 Specifically Core Strategy Policy CS1 sets out that the delivery of sustainable development (ie the housing requirement) will be delivered by directing new development towards previously developed land in the built up areas of, Leatherhead, Dorking, Ashted, Bookham and Fetcham as the most sustainable locations within the District. Part (4) of the policy states:
- The Council will review the existing Green Belt boundary through the Land Allocations DPD to ensure that there is sufficient land available to meet development requirements throughout the Plan period.
- 4.21 This is also stated in Chapter 4 (The Vision) of the Core Strategy. Para 4.3 indicates if there is insufficient land in the built up areas to meet development needs, provision will be met by extensions to the built-up areas following a review of the Green Belt boundary.
- 4.22 The final paragraph of Core Strategy Policy CS2 states:
- The Council's indicative housing trajectory shows that the District's housing requirement can be met without the need to use Green Belt / greenfield land until around 2016-17. Before then the Council will prepare a Land Allocations Plan. This will allocate sites in the built-up area and

Summary of the Plan and its Relationship to the Core Strategy

incorporate a review of the Green Belt boundary to ensure sufficient land is allocated to meet the District's housing requirements and that a release mechanism is established to manage its delivery.

- 4.23** With regard to Traveller sites Core Strategy Policy CS5 indicates that sufficient sites will be allocated within the Land Allocations DPD (i.e. now the Housing and Traveller Sites Plan) and that potential sites within existing settlement boundaries will be explored prior to the consideration of any site in the Green Belt or countryside beyond. This is a sites delivery matter and is not strategic in scope. With regard to the search for sites the Council has carried out "call for sites" exercises. However there have been difficulties with identifying available, deliverable sites and the proposed requirement that developers provide a small number of pitches on the larger proposed housing sites has caused concern.
- 4.24** The third part of the consultation Housing and Traveller Sites Plan is to respond to representations proposing relatively minor "tidying up" amendments to the existing Green Belt boundary, which are not associated with any specific development proposal. The Core Strategy also commits the Council to reviewing the boundaries of the Larger Rural Villages and Smaller Rural Villages (see supporting text to Core Strategy Policy CS2). The Housing and Traveller Sites Plan proposes such minor changes having regard to the advice in the NPPF (para 85) not to include land which it is unnecessary to keep permanently open" and should be defined using "physical features that are readily recognisable and likely to be permanent".

A "Daughter" Document

- 4.25** Having regard to all these matters the Council believes that the Housing and Traveller Sites Plan is a "daughter" document of the Core Strategy. It is a delivery mechanism in accord with the sustainability appraisal of the Core Strategy. The Council believes the consultation Plan does not introduce new matters of a strategic nature.
- 4.26** The Council has published several documents following the adoption of the Core Strategy which have indicated that an allocations plan will be a "daughter" document of the Core Strategy. In particular when publishing the Dorking Town Area Action Plan Scoping Report (Feb 2010) the Council sent to the statutory environmental bodies a note to explain the sustainability appraisal process for both the Area Action Plan and the proposed Land Allocations Plan. This note (Annex 6 of the Dorking AAP SAR) indicated, then, that the Council considered an allocations plan (ie now the Housing and Traveller Sites Plan) was a daughter document and there was no response to the contrary.
- 4.27** The Council published a new Scoping Report in February 2013 as a generic scoping report for future Plans. This also indicated the proposed allocations plan was a "daughter" document (at para 1.2). The Scoping Report was sent to the statutory environmental bodies, and again no responses were received on this.
- 4.28** The removal of land from the Green Belt and the allocation of land for housing may be considered by the local communities to be strategic or large scale. However the strategic consideration to release land from the Green Belt has been addressed through the sustainability appraisal and objectives of the Core Strategy. It is however necessary to assess the broad locations and proposed sites robustly and this can be undertaken by sustainability appraisal. This also ensures compliance with the EU Directive, if thought to be necessary.

Other Documents

- 4.29** The following documents sit behind the main consultation document and provide additional evidence base and background documents relevant to the Plan and sustainability appraisal process.
- Overarching Sustainability Appraisal of the Housing and Traveller Sites Plan (this document).

Summary of the Plan and its Relationship to the Core Strategy

- Green Belt Boundary Review and Analysis including Sustainability Appraisal and analysis of responses to the Green Belt Boundary Review Consultation Document (February 2013).
- Green Belt Review: Minor Green Belt Consultation
- Site Assessments: Housing - incorporating first draft of the Strategic Housing Land Availability Assessment.
- Local Development Scheme
- Gypsy and Traveller Accommodation Assessment.
- Highways and Transport Modelling.
- Employment Land Review.
- Statement of Community Involvement.
- Equality Impact Assessment

Chapter 5 Summary of the Core Strategy Sustainability Appraisal Report

The Core Strategy Vision

- 5.1 The Core Strategy is based on the following vision:
- 5.2 **Mole Valley will make provision for its share of the Region's growth of homes and jobs and provide for the needs of its communities but in a way that is sustainable, minimises significant harmful change to its distinctive character, environment and feel, and mitigates its impact on the causes of climate change. The District's natural, built and historic environment will be safeguarded and enhanced and communities will have safe, convenient and sustainable access to the services and facilities they require.**
- 5.3 The Core Strategy states this will be achieved by accommodating development and growth in a way that is sustainable, safeguarding the distinctive characteristics of the District's towns, villages and countryside. Development will be principally directed to the most sustainable locations in the District's main built-up areas to take advantage of existing infrastructure and services and reduce the need to travel. If there is insufficient land in the built-up areas to meet the District's development needs, provision will be met by small scale extensions to the built-up areas following a review of the Green Belt boundary.
- 5.4 This vision has regard to 8 strategy and policy goals:
1. **Strategic Planning Policy and Environmental Designations:** To safeguard and enhance the highly attractive and diverse natural built and historic environment of the District.
 2. **Housing:** To ensure provision of sufficient land to meet the District's housing requirements and provide a range of homes to address needs and means.
 3. **Local Economy:** To maintain a successful, sustainable and diverse local economy.
 4. **Transport:** To manage down traffic growth and encourage more sustainable transport choices by improving travel options and accessibility.
 5. **Shopping:** To ensure the District's town, district, local and village centres are successful and viable places for people to live, shop and spend their leisure time.
 6. **Recreation:** To safeguard and ensure the provision of sufficient land and facilities for open space, sport and recreation to meet current and future requirements.
 7. **The Impact of Climate Change:** To use natural resources wisely, reduce emissions that contribute to climate change and minimise the risk to communities from the effects of climate change.
 8. **Infrastructure Provision:** To ensure the efficient use of existing infrastructure, a reduction in demand on infrastructure by promoting behavioural change and ensuring the delivery of additional capacity by extending or providing new infrastructure.

The Core Strategy Sustainability Appraisal Report (SAR)

- 5.5 The policy goals (above) have themselves been derived through the sustainability appraisal work that took place throughout the preparation of the Core Strategy. This appraisal went through a series of iterations as the Core Strategy was prepared. Specifically in undertaking sustainability appraisal of the Core Strategy the following work was undertaken:
- **July 2005:** preparation of a Scoping Report setting out the context for the sustainability appraisal, baseline and quality of life information, and key sustainability issues. Also set out the sustainability objectives that had been developed and how appraisal will be undertaken.
 - **November 2005:** peer review appraisal process of the Core Strategy Issues and Options.
 - **March 2006:** peer review appraisal of the Core Strategy Preferred Options; goals and alternative strategies.

Summary of the Core Strategy Sustainability Appraisal Report

- **May 2006:** The outcome of the above work was set out in the Sustainability Appraisal Report May 2006 which was published and consulted on alongside the Core Strategy Preferred Options.
 - **February 2008:** publication of a further set of Core Strategy Issues and Options. In order not to repeat previous work only the entirely new options were subject to sustainability appraisal.
 - **May 2008:** publication of Core Strategy Revised Preferred Options. This included an indication of the likely policy wording and the influence sustainability appraisal had on the chosen option. The Council considered the need for further sustainability appraisal. An exercise to compare the policy approaches in the Revised Preferred Options (May 2008) with the Preferred Options (May 2006) concluded there were no significant changes and that a new SAR was not required.
 - **November 2008:** publication of the Core Strategy Proposed Submission Document. This did not present any new options and no further sustainability appraisal was undertaken. A few minor factual/updating changes were made to the SAR, May 2006, which was then republished with Appendices setting out the above work. This is the SAR that was submitted with the Core Strategy.
- 5.6** The process of sustainability appraisal helped develop and refine the Core Strategy. A systematic and iterative process was used to assess issues, objectives and options, which enabled:
- the selection of the most sustainable options;
 - the revision of some options to make them more sustainable, and
 - the identification of the need to consider mitigation to address effects and achieve more sustainable outcomes.
- 5.7** This iterative process of sustainability appraisal started with the preparation of the Preferred Options for the Core Strategy and continued through the preparation of the subsequent revisions to the Core Strategy, including the 'Further Issues and Options' and the 'Revised Preferred Options'.
- 5.8** The Core Strategy Revised Preferred Options was set out in a format which included a draft policy approach and a statement of the outcome of the sustainability appraisal relating to each policy option and conclusion, including positive and negative impacts. This assisted the formulation of the final policy wording in the submission Core Strategy DPD.
- 5.9** Chapter 5 of the Core Strategy SAR considered the main strategic options and how they were identified. These were condensed into 3 reasonable alternatives. It was at the sustainability appraisal of the Core Strategy Preferred Options (March 2006) that the 3 spatial reasonable alternatives of concentration, expansion, or dispersal of expansion were assessed (see Appendix 8 of the Core Strategy SAR). The first alternative of concentration was found to be the most sustainable reasonable alternative.

Inspector's Report Comments on the Core Strategy SAR and Spatial Strategy

- 5.10** In order for the Core Strategy to be found "sound" the Planning Inspector asked:
- 5.11** *Is the Strategy the most appropriate when considered against the reasonable alternatives?*
- 5.12** The Inspector's Report commented (at para 3.7) that the SAR shows how the strategy has evolved over several years and shows how assessment of sustainability has influenced the development of the strategy. The SAR documents provide an audit trail of the preparation of the strategy, and demonstrates that it is the most appropriate when considered against the alternatives. The Inspector noted that the reasonable alternative of "concentration" scored highly.
- 5.13** The Inspector also addressed the issue of the location of development in particular that in determining where development should be directed, protection of the countryside, together with Green Belt, AONB and other environmental designations, has to be balanced with providing growth of homes and jobs.

Summary of the Core Strategy Sustainability Appraisal Report

The Inspector commented that the alternative of "concentration" approach alone may not offer sufficient flexibility to meet needs and to ensure that the strategy is robust and flexible, the spatial strategy incorporates elements of the "expansion" and "dispersal of expansion" options.

Conclusion

5.14 This has led to a spatial strategy based primarily on the option of "concentration" (Alternative 1) identified in the Core Strategy Preferred Options, and which scores highly against sustainability objectives. However to ensure the strategy is robust and flexible the spatial strategy also includes elements of the 'expansion' and 'dispersal of expansion' reasonable alternatives (Alternatives 2 and 3). The adopted Core Strategy therefore directs development and growth to the most sustainable locations (ie the main built-up areas); and that if there is insufficient land provision will be made by extensions to the built-up areas.

Chapter 6 What has Changed Since the Adoption of the Core Strategy Sustainability

Policy Documents

- 6.1 The most significant change has been the publication in March 2012 of the National Planning Policy Framework (NPPF). This states that the planning system is to contribute to the achievement of sustainable development and the policies of the NPPF, taken as a whole, constitute the Government's view of what sustainable development means in practice for the planning system. The NPPF sets out that the heart of the framework is a **presumption in favour of sustainable development** and which is a "golden thread" running through plan making and decision taking. The NPPF sets out 12 core planning principles which cuts across all the themes of sustainable development and which should underpin plan making. The core principles may be considered to underpin the basis on which sustainability appraisal is undertaken. There is an overall objective that plans should be positively prepared and contribute to the government agenda of "Planning for Growth".
- 6.2 Guidance on Planning for Traveller sites was published at the same time as the NPPF (replacing Circular 01/2006).
- 6.3 In September 2013, the government published practice guidance to supplement the NPPF. This takes forward previous government advice and emphasises that sustainability appraisal does not need to be done in any more detail, or using more resources, than is considered appropriate for the content and level of detail in the Plan.

Scoping Report: Headlines and Implications

- 6.4 In preparing a site allocations plan (the Housing and Traveller Sites Plan) there is no general need to revise Core Strategy evidence since the strategic principles established in the Core Strategy are not being re-opened. However the Council has sought new or updated evidence including employment (to identify if there is land which can be re-used for housing); and transport (implications of the location of new development and impacts on the highway network).
- 6.5 The changes to the sustainability appraisal baseline, in a Scoping Report, can also identify if new significant matters have emerged. In February 2013 the Council published an SA/SEA Scoping Report as a generic document appropriate for plan preparation in the District. It contains updated baseline and trend information from a range of sources including the Authority Monitoring Report (AMR). The information is set out within the themes of SEA of the European Directive and then the wider social and economic topics of sustainability appraisal. Changes and issues identified in the Scoping Report, since the Core Strategy SAR, are:
- 6.6 **Biodiversity and Nature Conservation:** no significant changes to baseline. Continued need to maintain protection and improve quality of habitats. Balance with need of leisure / recreation and wider development requirements and vulnerability of areas of biodiversity.
- 6.7 **Population:** 2011 Census indicates the population has increased by 5,100 (6.5%) since 2001. The age profile is relatively older than that nationally. Implications for future household characteristics and the provision of housing, employment and services. These are the continuation of trends and current issues rather than new significant matters.
- 6.8 **Health:** The District's population is relatively healthy and life expectancy is slightly higher than the national average. Continuing trend towards a more elderly population and more sedentary lifestyles.

What has Changed Since the Adoption of the Core Strategy Sustainability

- 6.9 Geology and Soil:** no change to the baseline. There may be issues of land remediation and whether soils and underlying geology in built up areas are appropriate for sustainable drainage.
- 6.10 Water:** With regard to water supply it is understood water resources are satisfactory for the Plan period. Continuing the objective of avoiding new development on areas of higher flood risk is important.
- 6.11 Air Quality:** There are no Air Quality Management Areas (AQMA's) within the District. Whilst air quality limits are not currently being breached there is the potential for this to happen as a result of increasing congestion and new development. There will need to be a consideration of development in relation to areas which may have emerging air quality issues and with regard to possible allocations on a site by site basis.
- 6.12 Climate Change:** Long term implications of climate change at the local level remain uncertain. New development will need to continue to mitigate any impacts locally.
- 6.13 Cultural Heritage:** There is a continuing need to strike a balance between intensification on previously developed land and the need to safeguard the historic environment.
- 6.14 Landscape and Countryside:** There has been no change to the extents of the District in the built up areas and areas covered by the Green Belt. The Core Strategy seeks to direct new development towards previously developed land in the built up areas but acknowledges that to meet requirements some land outside these areas will be required.
- 6.15 Amenity and Community Facilities:** Changing population characteristics and new developments are likely to give rise, locally, to the need for additional community facilities of various types and which may require additional land for these.
- 6.16 Social Inclusiveness, Equal Opportunities and Access to Services:** The 2011 Census data has not indicated new issues above those previously apparent. There is a continuing issue of the quality of life of all sectors of the population and specific geographical areas with regard to social Inclusiveness, equal opportunities and access to services.
- 6.17 Housing Provision:** Overall housing completions to 2013 have exceeded the requirement and so reducing the residual requirement to 2026. However the build out of sites and reducing levels of outstanding planning permissions has resulted in a deficit against the 5 year housing supply requirement. Much of the new housing in the District has historically come forward on small sites in the built up areas (i.e. windfalls). Whilst such sites in built up areas are anticipated to continue to emerge there is a need to review the Green Belt Boundary to ensure that sufficient land is available. The need to provide for affordable housing requirements and for different house types is a continuing issue.
- 6.18 Economic Development and Town Centres:** Notwithstanding the current recession unemployment remains lower than nationally and outstanding permissions are being built out. The Employment Land Review 2013 indicates there is sufficient vacant and available land to meet local employment needs and an element of demand led growth to 2021. There are not considered to be any identified employment areas which could be available for other uses.
- 6.19 Land (brownfield and greenfield):** Most new development takes place on previously developed land in the built up areas as the most sustainable locations. This approach is to continue but will not deliver all the housing requirement.
- 6.20 Traffic and Commuting:** The Transport Assessment has highlighted continuing concerns at the implications for traffic congestion at peak hours.

What has Changed Since the Adoption of the Core Strategy Sustainability

- 6.21 Noise Sources:** The issue of noise is likely to be mainly related to site specific issues with regard to the allocation of sites.
- 6.22 Crime:** Data for crime indicates that levels in the District are below national rates. Crime and fear of crime should be reduced through the design of new development.
- 6.23 Sustainable Development and Construction; Energy Consumption and Efficiency:** These are matters which fall principally within the remit the layout of sites, design of buildings and building regulations.

Conclusion

- 6.24** There are no new or significant additional cumulative impacts arising which would affect the conclusions of the Core Strategy SAR. None of the above changes to the baseline and trends are considered to be of strategic importance. However these may be locally significant when considering the appraisal of broad locations and proposed sites for allocations.

Revising the Sustainability Objectives

- 6.25** The Council is required to outline the sustainability objectives and criteria against which the alternative strategies / options and subsequent policies of plans will be appraised in order to make the appropriate plan as sustainable as possible. In preparing the Core Strategy a suite of 23 objectives was used. The suite of objectives has since been subject to revision and this process is set out in detail in the Scoping Report.
- 6.26** The SA framework used in the preparation of the Core Strategy was developed through a series of workshops and working groups held jointly with other Surrey local planning authorities, Surrey County Council and with the statutory environmental consultation bodies. Through this joint working a suite of 23 sustainability objectives was established to enable the east Surrey authorities (Mole Valley, Elmbridge, Tandridge, Reigate and Banstead, and Epsom and Ewell) to assess their development plans. These objectives were based on the objectives of the Sustainability Appraisal of the South East Plan and the 25 key objectives in the Integrated Regional Framework.
- 6.27** Through the plan preparation process of the east Surrey authorities it became apparent that the 23 objectives could be further refined. In summer 2012 the east Surrey authorities re-considered the objectives. A revised suite of 19 objectives has been developed. The three statutory environmental bodies were consulted on these revised objectives and have signed them off.
- 6.28** The process of revising the objectives has been an iterative one of development and amendment rather than fundamental change. In reviewing the objectives the east Surrey authorities had regard to:
- Whether some objectives could be merged to address a sustainability theme or aim more comprehensively.
 - Whether other objectives should be dis-aggregated to ensure no ambiguity in their intent.
 - The role of the decision aiding questions in explaining the intent of the objective.
 - Whether the objectives are now necessary or fit for purpose.
- 6.29** For some themes the number of objectives has been reduced, however this reflects the conciseness of the themes compared to others.
- 6.30** To help the assessment of the options a set of decision aiding questions have been developed. These have been further revised by the individual east Surrey authorities and in response to suggestions by the statutory consultation bodies.

What has Changed Since the Adoption of the Core Strategy Sustainability

6.31 This process of revising the SA objectives has resulted in a more concise set of objectives. They are, in effect, the same objectives but rephrased and reformatted. The process has not introduced new matters for assessment which would require the Core Strategy reasonable alternatives to be subject to new appraisal.

Area and Site Specific Sustainability Appraisal

6.32 Not all of the SA objectives are applicable to site specific circumstances. Consequently a reduced set of objectives has been used for the assessment of areas and sites. The rationale for this is set out in Chapter 9.

Chapter 7 A Re-evaluation of the Core Strategy Sustainability Appraisal Report

Introduction

7.1 The information in Chapters 5 and 6 can be used to re-assess the compliance of the Core Strategy SAR with the NPPF practice guidance having regard to the sustainability appraisal process and outcomes.

The NPPF practice guidance sustainability appraisal process

7.2 The NPPF practice guidance sets out a 5 stage (A - E) approach to producing a sustainability appraisal.

7.3 **Stage A: Setting the context and objectives, establishing the baseline and scope:**

7.4 **Commentary:** The original scope and baseline was undertaken for the Core Strategy SAR through the Scoping Report July 2005 and baseline. A new scoping Report 2013 has been published together with updated baseline and trends. The Core Strategy SAR sustainability goals (ie objectives) have not been updated as there is no need to re-open strategic issues for the allocations plan. However these goals have been looked at again in the context of the NPPF to ensure they remain valid (see below). The new Scoping Report identified issues and problems and the statutory environmental bodies were consulted.

7.5 **Stage B: Developing and refining alternatives and assessing effects:**

7.6 **Commentary:** This work on the development, and assessment, of reasonable alternatives was undertaken for the Core Strategy which set out the spatial approach to the delivery of the housing requirement. The Housing and Traveller Site plan seeks to deliver this requirement in the context of the spatial strategy.

7.7 **Stage C: Prepare the Sustainability Report:**

7.8 **Commentary:** This document together with the allocations plan and assessments of sites and Green Belt areas forms a draft sustainability appraisal report.

7.9 **Stage D: Publish and consult on the SAR and Local Plan:**

7.10 **Commentary:** The plan is being published as a consultation document together with this draft SAR and other background documents. The plan and SAR will be amended in the light of representations received.

7.11 **Stage E: Post adoption reporting and monitoring:**

7.12 **Commentary:** A post adoption SAR statement will be published in due course and appropriate additional monitoring indicators will be incorporated into the AMR.

7.13 The Council's approach is to retain the Core Strategy SAR as the base together with a new Scoping Report, this draft SAR, and site specific sustainability appraisal is an appropriate and proportionate means of complying with these stages.

The Core Strategy SAR in Relation to the NPPF

7.14 A SAR must identify, describe and evaluate the likely significant effects on the environment of implementing policies and of the reasonable alternatives taking into account the objectives and geographical scope of the plan. The NPPF comments that sustainability appraisal is to consider ways in which the plan can contribute to improvements in environmental, social and economic conditions as well as identifying and mitigating any potential adverse effects that the plan might otherwise have. By doing so it can help make sure that the proposals (i.e. sites) in the plan are the most appropriate given reasonable alternatives.

A Re-evaluation of the Core Strategy Sustainability Appraisal Report

- 7.15** The Core Strategy spatial strategy and policies are derived from reasonable alternatives and sustainability goals (ie objectives). The evaluation of these goals was set out in Section 5.4 of the Core Strategy SAR. The NPPF requires plans to be positively prepared, deliver sustainable development and adhere to core principles. A brief re-assessment of the the Core Strategy sustainability goals against the principles of the NPPF indicates the original sustainability appraisal remains appropriate.
- 7.16** All of the Core Strategy sustainability appraisal (SA) goals are positively worded. The following table compares the Core Strategy SA goals with the principles of the NPPF.

	SA Goal	NPPF Compatibility
A	To safeguard and enhance the highly attractive natural environment.	Accords with a core planning principle and section 11 of the NPPF.
B	To provide homes to suit all needs and means.	Broadly accords with a core planning principle and section 6 of the NPPF.
C	To improve transport and accessibility.	Accords with a core planning principle and section 4 of the NPPF.
D	To maintain and improve the built environment.	Accords with a core planning principle and sections 7 and 12 of the NPPF.
E	To ensure the provision of adequate infrastructure, services and community facilities to meet current and future requirements.	Accords with a core planning principle and section 8 of the NPPF.
F	To ensure safer and stronger communities.	Accords with a core planning principle and sections 7 and 8 of the NPPF.
G	To maintain a successful local economy.	Broadly accords with a core planning principle and section 1 of the NPPF.
H	To ensure successful town and local centres.	Accords with a core planning principle and section 2 of the NPPF.

Table 7.1

- 7.17** It is therefore considered that the approach of the Core Strategy and SAR accords with the principles of the NPPF. It is accepted that the Core Strategy and Housing and Traveller Sites Plan do not address meeting objectively assessed needs; this will be for a new Local Plan and new sustainability appraisal. Hence SA goals Band G are only considered to be broadly met.
- 7.18** One test of the NPPF is whether plans are sufficiently flexible. The Inspector into the examination of the Core Strategy concluded that "the Core Strategy is sufficiently flexible to deal with changing circumstances. It provides a clear overall strategy and sets out the principles for managing development".
- 7.19** The NPPF also requires sustainability appraisal to compare the alternative options and assess these against the baseline social, environmental and economic characteristics. This was done for the Core Strategy sustainability appraisal and Chapter 6 of this document has commented on the updated baseline and issues. This has not identified new or significant additional cumulative impacts arising, which would affect the conclusions of the Core Strategy SAR.
- 7.20** The Core Strategy Inspector's report noted that the reasonable alternative of "concentration" scored highly but also commented that this may not offer sufficient flexibility to meet needs and to ensure that the strategy is robust and flexible. The report notes that the spatial strategy incorporates elements of the "expansion" and "dispersal of expansion" options in order to ensure the necessary robustness and flexibility. The 3 reasonable alternatives accord with the principles of the NPPF and in particular directing development to previously developed land and the most sustainable locations; including broad locations.

'Signposting' the Housing and Traveller Site Plan Sustainability Appraisal

Chapter 8 'Signposting' the Housing and Traveller Site Plan Sustainability Appraisal

Introduction

8.1 Chapters 6 has identified the new environmental, social and economic issues arising since the Core Strategy SAR. Chapter 7 has evaluated compatibility with the NPPF and identified where the sustainability appraisal process Stages A - E have been or will be carried out.

Compliance with the European Directive

8.2 The sustainability appraisal of plans also has to comply with the European Directive on strategic environmental assessment.

8.3 The NPPF practice guidance contains a checklist of those matters within the Directive which need to be in a sustainability appraisal report in order for it to comply with the Directive. This checklist has been used as an audit trail or to "signpost" where the Core Strategy SAR and current site and locations sustainability appraisal work has been undertaken. This approach was used for the Dorking Town Area Action Plan (DTAAP) which is also a "daughter" plan of the Core Strategy. The following table sets out the NPPF checklist and identifies where the matters have been addressed.

Requirement of the SEA Directive	Where this matter has been addressed	Notes
Preparation of an environmental report	This document forms the draft SAR	A final SAR will accompany the submission plan
a) An outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes.	To be within the final SAR	See also the Scoping Report 2013 and the Plan consultation documents Jan 2014
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Scoping Report 2013	See also Chapter 6 of this Document
c) The environmental characteristics of areas likely to be significantly affected.	Green Belt Boundary Review Consultation 2013; Scoping Report 2013; Site Assessments: Housing 2014	
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	Green Belt Boundary Review Consultation 2013; Scoping Report 2013; Site Assessments: Housing 2014	
e) The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	Scoping Report 2013	
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Core Strategy SAR and Scoping Report 2013	See also Chapter 6 of this Document

'Signposting' the Housing and Traveller Site Plan Sustainability Appraisal

Requirement of the SEA Directive	Where this matter has been addressed	Notes
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Core Strategy SAR and Site Assessments: Housing 2014	
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Core Strategy SAR and Site Assessments: Housing 2014	See also Chapters 4, 5 and 7 of this document
i) A description of the measures envisaged concerning monitoring in accordance with Article 10.	Core Strategy Monitoring Framework to be revised as appropriate	Any additional indicators to be incorporated into the Authority Monitoring Report.
j) A non-technical summary of the information provided under the above headings.	To be included in the final SAR	To be included in the final SAR
The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the content and level of detail in the plan, its stage in decision making and the extent to which certain matters are more appropriately assessed at different levels in the process to avoid duplication.	To be included in the final SAR	To be included in the final SAR
Consultation: authorities with environmental responsibility.	Consulted on the Core Strategy Plan and SAR stages; consulted on Scoping Report 2013 and on this document and the consultation on the Plan.	
Taking the environmental report and results of consultations into account in decision making.	Representations received will be taken into account in the allocation of sites and for the implementation of policies arising.	
Provision of information on the decision: when the plan is adopted.	To be done at a later stage	Adoption environmental statement when the Local Plan is adopted
Monitoring of significant effects.	Core Strategy Monitoring Framework to be revised as appropriate	
Quality assurance: reports should be of sufficient standard to meet the requirements of the Directive.	The draft SAR has fully evidenced and provided links with the Core Strategy SAR to show that the current work is robust	The Council is also mindful that the NPPF states such work should be proportionate.

Table 8.1

Comparison of the Housing and Traveller Sites Plan with the Core Strategy Goals and SAR

8.4 The Housing and Traveller Sites Plan is an implementation strategy for those policies in the Core Strategy with a spatial component. These are Policies CS1, CS2 and CS5. Policy CS4 also has a spatial element with regard to the provision of affordable housing and has been included in the following exercise. The Housing and Traveller Sites Plan will identify the relevant sites and locations to implement these Core Strategy policies. The table below identifies the relevant Core Strategy policy and theme and then identifies the policy goals and sustainability goals. This exercise "signposts" where the goals (objectives) of the relevant Core Strategy policies have already been subject to appraisal in the Core Strategy SAR

'Signposting' the Housing and Traveller Site Plan Sustainability Appraisal

and therefore does not need to be subject to new appraisal or otherwise duplicated. This work is at Chapter 5 and Appendix 8 of the Core Strategy SAR and includes assessment of these goals against the 3 alternative strategies. This "signposting" exercise was also undertaken as part of the DTAAP SAR.

Core Strategy Policy to be delivered	Key themes of the Policy	The Core Strategy Policy Goal	The Core Strategy Sustainability Goal / Objective	Where this has been considered through existing sustainability appraisal
CS1 - Where development will be directed	Sets out spatial strategy and the principle that new development will be directed to previously developed land in the built up areas. Indicates a review of the Green Belt will take place.	Goal 2 - Housing Goal 4 - Transport Goal 8 - Infrastructure Provision	Goal B - To provide homes to suit all needs and means. Goal C - To improve transport and accessibility. Goal E - To ensure provision of adequate infrastructure.	Core Strategy SAR section 5.4 and Appendix 8. Policy CS2 reflects the need to use the 3 reasonable alternatives tested in the Core Strategy SAR.
CS2 - Housing Provision and location	Sets out the housing requirement and the priority locations	Goal 2 - Housing Goal 4 - Transport Goal 8 - Infrastructure Provision	Goal B - To provide homes to suit all needs and means. Goal C - To improve transport and accessibility. Goal E - To ensure provision of adequate infrastructure.	Core Strategy SAR section 5.4 and Appendix 8. Policy CS2 reflects the need to use the 3 reasonable alternatives tested in the Core Strategy SAR.
CS4 - Affordable Housing	Identifies affordable housing provision threshold requirements and considerations with regard to rural villages.	Goal 2 - Housing	Goal B - To provide homes to suit all needs and means.	
CS5 - Gypsies, Travellers and Travelling Showpeople	Identifies that provision will be made through the allocations plan.	Goal 2 - Housing	Goal B - To provide homes to suit all needs and means.	

Table 8.2

8.5 The table shows that the spatial strategy of the Core Strategy has been covered by previous sustainability appraisal and does not need to be duplicated in a new SAR.

Chapter 9 Summary of the Site Assessment Sustainability Appraisal Process

Introduction

- 9.1 The conclusion from previous chapters is that the Core Strategy spatial strategy and the requirement to review the Green Belt has been subject to sustainability appraisal which is still appropriate and does not need to be repeated or updated. New sustainability appraisal is only required to assess the broad locations and sites considered for allocation.
- 9.2 The Council consulted on the review of the Green Belt boundary in February 2013. This considered the parcels of land in the Green Belt around the main towns in the District, and to assess the scale of contribution they make to the Green Belt purposes. Those areas which exhibit the lesser contribution can then be seen as the areas of search for housing land. However all sites submitted to the Council have been assessed through sustainability appraisal and other evidence.
- 9.3 The Scoping Report identifies a full suite of 19 sustainability objectives. However not all of these are relevant or necessary when applied to more site specific assessment. The appraisal of sites in the Dorking Town Area Action used a "cut down" set of objectives to assess sites and a similar process has been adopted for the consideration of sites and locations in this Plan. This makes use of the "cut down" set of the objectives used in the Site Appraisal Toolkit 2013. This "cut down" suite of objectives includes those required to comply with the SEA Directive.
- 9.4 The following table sets out the full list of sustainability objectives and indicates those which are being used for site or other area assessments.

Objective Number	Objective	Site Appraisal toolkit	Site Assessments:Housing 2014	Green Belt / Broad Areas Assessment
1	To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	Yes	Yes	No
2	To facilitate the improved health and wellbeing of the whole population.	Yes	Yes	Yes
3	To reduce poverty and social exclusion.	No	No	No
4	To minimise the harm from flooding.	Yes	Yes	Yes
5	To improve accessibility to all services and facilities, and natural greenspace.	Yes	Yes	Yes
6	To make the best use of previously developed land and existing buildings.	Yes	Yes	No
7	To reduce land contamination and safeguard soil quality and quantity.	Yes	Yes	No
8	To ensure air quality continues to improve.	Yes	Yes	No
9	To reduce noise pollution.	Yes	Yes	Yes
10	To reduce light pollution.	Yes	Yes	Yes
11	To improve the water quality of rivers and groundwater, and maintain an adequate supply of water.	Yes	Yes	Yes

Summary of the Site Assessment Sustainability Appraisal Process

Objective Number	Objective	Site Appraisal toolkit	Site Assessments:Housing 2014	Green Belt / Broad Areas Assessment
12	To conserve and enhance biodiversity and networks of natural habitat.	Yes	Yes	Yes
13	To conserve and enhance landscape character and feature, the historic environment and cultural assets and their setting.	Yes	Yes	Yes
14	To reduce the need to travel, encourage sustainable transport options and make the best use of existing transport infrastructure.	Yes	Yes	Yes
15	To ensure that the District adapts to the impacts of the changing climate.	No	No	No
16	Provide for employment opportunities to meet the needs of the local economy.	Yes	Yes	No
17	Support economic growth which is inclusive, innovative and sustainable.	No	No	No
18	To achieve sustainable production and use of resources.	No	No	No
19	To increase energy efficiency and the production of energy from low carbon technologies, renewable sources and decentralised generation systems.	Yes	Yes	No

Site Appraisal and Assessments Objectives

9.5 At the individual site level the sustainability assessment needs to be more specific so that it can be used to aid the selection of sites for development. Only those objectives which lend themselves to this are to be used. This approach was consulted on through the preparation of the Site Appraisal Toolkit. The following information, summarising Appendix 2 of the Site Appraisal Toolkit explains the rationale for the use of a reduced set of sustainability objectives for this work.

Objective	1: To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.
Status	This objective will be used as part of the sustainability appraisal of sites.
Commentary	<p>In order to assess a proposal against this objective, sites will be considered against Core Strategy Policies CS2, CS3, CS4 and CS5 which set out the requirements for the provision of housing. The following types of housing / sites are particularly sought; two and three bedroom dwellings; new housing for the elderly, and supported and specialist accommodation; sites for pitches for Gypsies, Travellers and Travelling Show people within the District.</p> <p>Proposals which provide one or more of these key types of accommodation will be rated favourably. It will be assumed that all sites will provide the level of affordable housing as required by Policy CS4 or any subsequent policy. Sites which cannot achieve this will be considered less favourably. This assessment will not take into account the location of the proposal as the suitability of a location for the proposed use is considered through the assessment of other objectives and the initial site assessment work</p>

Table 9.1

Summary of the Site Assessment Sustainability Appraisal Process

Objective	2: To facilitate the improved health and wellbeing of the whole population.
Status	This objective will be used as part of the sustainability appraisal of sites.
Commentary	<p>This objective has been used to assess levels of ill-health and access to medical facilities across the District. The remit is now broader and there is greater emphasis on the need to provide places which contribute to the health and wellbeing of those living there. Ensuring that people have access to open spaces, green infrastructure and sports, recreational and play spaces and facilities which are safe and easily accessible by walking, cycling and public transport are now key considerations.</p> <p>The assessment of a site against this objective will still also consider the more traditional assessment of access to health facilities. Any proposals which results in the loss of a health facility (such as a Doctors surgery) or the loss of / reduction in quality of or access to open space, sports and recreation facilities without suitable mitigation will rate poorly. Those proposals which result in an increase in the level of / quality or access to health facilities, open space, sports or recreation facilities, particularly in areas identified as having a deficit of such facilities will rate very well. Proposals near to existing facilities will also rate well against the objective unless there is evidence of insufficient capacity.</p>

Table 9.2

Objective	3: To reduce poverty and social exclusion.
Status	This objective will not be used as part of the sustainability assessment of individual sites.
Commentary	<p>Within Mole Valley there are limited areas of deprivation, although a few pockets do exist. There are however many parts of the district with poor access, particularly by foot, cycle or public transport, to services and facilities which can lead to the exclusion of some parts of the community, particularly in rural areas.</p> <p>The accessibility of sites to services and facilities is already assessed through Objective 5 so does not need to be considered again. Other aspects such as addressing issues of deprivation and improving participation in further education are not felt to be issues that can be realistically assessed as part of the site assessment process. However, if an individual proposal seeks to address an element of this objective not already covered elsewhere this will be highlighted as part of the assessment.</p>

Table 9.3

Objective	4: To minimise the harm from flooding.
Status	This objective will be used as part of the sustainability assessment of individual sites.
Commentary	<p>In order to reduce the risk of flooding to any development, Core Strategy Policy CS20 states that the Council will not be seeking to allocate sites or permit development for housing in Flood Zones 3a or 3b and therefore such development proposals will rate very poorly against this sustainability Indicator. Applications for housing in Flood Zone 2 will only be considered if all other alternatives have been assessed and it has been demonstrated that they are unsuitable. Such sites will also rate poorly against the indicator.</p> <p>The assessment of flood risk will also take into account surface water and other sources of flooding. The use of Sustainable Drainage Systems will be expected as part of all developments and therefore this aspect of minimising the harm from flooding will not be used to individually assess sites.</p> <p>Sites that are within Flood Zone 1, not in areas at risk from surface water and other sources of flooding such as groundwater, will rate well against this indicator, particularly if there is no evidence that the proposal will cause issues off-site or where it provides remediation against existing flood issues.</p>

Table 9.4

Summary of the Site Assessment Sustainability Appraisal Process

Objective	5: To improve accessibility to all services and facilities, and natural greenspace.
Status	This objective will be used as part of the sustainability assessment of individual sites.
Commentary	<p>The Council will make an assessment of the extent to which a proposal meets, or otherwise, this objective. Sites that are within easy walking / cycling distance of a wide range of services and facilities such as education, employment, recreation (including natural greenspace), health, community and cultural centres will rate very well. Those which contribute through for example, the development of a new service or facility, will also rate highly.</p> <p>Consideration will also be given to the type of facility and service that the proposal is accessible to, as some will obviously be more important than others, particularly for those with no access to a car.</p>

Table 9.5

Objective	6: To make the best use of previously developed land and existing buildings.
Status	This objective will be used as part of the sustainability assessment of individual sites.
Commentary	The re-use of previously-developed land or existing buildings will rate more favourably than the development of a greenfield site. Other sustainability objectives assess the location of the site, access to services and facilities and for example the extent to which contaminated land might be cleared. These are therefore not considered within this objective.

Table 9.6

Objective	7: To reduce land contamination and safeguard soil quality and quantity.
Status	This objective will be used as part of the sustainability assessment of individual sites.
Commentary	<p>This objective has been divided into two subsections:</p> <p>a) To reduce land contamination – Proposals which would result in the remediation of known contamination will rate well where as those that do nothing to remediate known and significant contamination will rate poorly. In many cases there will be no land contamination issues and this element of the objective will be marked as not applicable. Where there is some uncertainty a precautionary approach will be taken until an assessment has been undertaken by the land owner / developer to demonstrate that the land is not contaminated or that remediation is possible.</p> <p>b) To safeguard soil quality – Agricultural land is classified into five grades. Grade 1 is the best quality and Grade 5 is the poorest quality. Development of land classified as agricultural Grade 1 or 2 will rate poorly as such a proposal will fail to protect the best and most versatile land. The scoring will improve as the quality of the land reduces. The development of previously developed land with no agricultural value will rate well.</p> <p>Soil quality is not assessed here as overall the amount of land that will be developed will be the same no matter which individual sites are allocated.</p>

Table 9.7

Objective	8: To ensure air quality continues to improve.
Status	This objective will be used as part of the sustainability assessment of individual sites.
Commentary	Air quality limits within the District are currently not being breached but there is potential for this to happen as a result of congestion, new development and a range of other factors. The assessment will therefore consider whether development proposals will significantly add to levels of air pollution be it through the nature of the development or associated impacts such as high levels of traffic generation. Proposals which would result in the removal of a pollution generator will rate more favourably.

Summary of the Site Assessment Sustainability Appraisal Process

Objective	8: To ensure air quality continues to improve.
	Development proposals which may be affected by existing air pollution issues will be identified as part of the assessment.

Table 9.8

Objective	9: To reduce noise pollution.
Status	This objective will be used as part of the sustainability assessment of individual sites.
Commentary	<p>Two aspects of noise pollution are being considered:</p> <p>a) To reduce the level of noise pollution - Proposals which will result in the loss of a considerable source of noise pollution will rate well against this objective. The majority of proposals are likely to result in some level of noise pollution, even if only in a small way due to the general urbanising effects of development. In assessing the impact, the existing use of the proposed site will also be taken into account. The development of a greenfield site is likely to be rated less favourably in terms of this objective than the redevelopment of an existing industrial site.</p> <p>b) To ensure people are not exposed to unacceptable levels of noise – Therefore proposals for noise sensitive development, such as homes or schools, in locations close to significant noise sources, such as major roads or Gatwick, will rate poorly against this objective. Those proposals located near to other noise generating uses such as some commercial / industrial uses will also rate less favourably. Schemes in areas of predominantly residential character and not near to larger pieces of transport infrastructure will rate better. The Council will use the noise exposure categories set out in the Mole Valley Local Plan 2000.</p> <p>In the event of any uncertainty over the assessment of a proposal against this objective a precautionary approach will be taken until such time as further evidence to the contrary is supplied by the developer / landowner.</p>

Table 9.9

Objective	10: To reduce the level of light pollution.
Status	This objective will be used as part of the sustainability assessment of individual sites.
Commentary	<p>Two aspects of light pollution are being considered.</p> <p>a) To reduce the level of light pollution - proposals which result in the loss of a considerable source of light pollution will rate very well. However, it is anticipated that most proposals will result in some issues when assessed against this objective. Sites are likely to add, even if only in a small way, to light pollution due to the desire for street lighting and the general urbanising effects of development.</p> <p>b) To ensure people are not exposed to unacceptable levels of light – Proposals which are adjacent to major sources of light pollution particularly those that may continue on throughout the night will rate very poorly against this objective. It is anticipated that most proposals will be considered to be neutral.</p> <p>In the event of any uncertainty over the assessment of a proposal against this objective a precautionary approach will be taken until such time as further evidence to the contrary is supplied by the developer / land owner.</p>

Table 9.10

Objective	11: To improve the water quality of rivers & groundwater, & maintain an adequate supply of water.
Status	This objective will be used as part of the sustainability assessment of individual sites.

Summary of the Site Assessment Sustainability Appraisal Process

Objective	11: To improve the water quality of rivers & groundwater, & maintain an adequate supply of water.
Commentary	<p>Sites which are likely to have a significant impact on water quality for example those above a groundwater source protection zone which are likely to be particularly polluting, will rate very poorly, as will those which result in significant damage to watercourses within the District. Those proposals which would improve water quality (in terms of biological, chemical or levels of nutrients) particularly in areas identified as moderate or worse by the Environment Agency will rate much better when assessed against this sustainability objective. Those sites for which there are no water course or groundwater issues will also rate well.</p> <p>Unless informed otherwise it is currently assumed that an adequate supply of water can be provided to all sites without unacceptable damage.</p>

Table 9.11

Objective	12: To conserve and enhance biodiversity and networks of natural habitat.
Status	This objective will be used as part of the sustainability assessment of individual sites.
Commentary	<p>Development which would, for example, result in enhancements to the biodiversity of the District; increase connectivity of habitats; protect designated areas of nature conservation; contribute to the network of green infrastructure etc, will rate well against this objective. Those which would cause damage to a national or internationally protected site will rate very poorly.</p> <p>The precautionary principle will be applied and therefore only sites that have been accompanied by appropriate survey work and proposals will rate well, most others will be considered as neutral unless their location suggests that they will have a significant impact. It should be noted that this objective does not relate solely to greenfield sites as many brownfield sites also contain an array of biodiversity.</p>

Table 9.12

Objective	13: To conserve and enhance landscape character & features, the historic environment & cultural assets & their setting.
Status	This objective will be used as part of the sustainability assessment of individual sites.
Commentary	<p>This objective has been divided into three subsections:</p> <p>a) To conserve and enhance the landscape character – Development which would significantly improve the landscape of the District including the restoration of damaged landscapes will rate very well. Those which would cause damage to a national or internationally protected site will rate less well.</p> <p>b) To conserve and enhance the historical environment – Development which would significantly improve or protect such environments or properties, will rate very well. Conversely proposals which would result in the loss or cause significant damage to the historic environment will rate very poorly.</p> <p>c) To conserve and enhance cultural assets – Development which would ensure the long term future of the Districts cultural assets will rate very well. It is anticipated that most schemes will have no or an immeasurable impact, in these cases they will be considered as neutral.</p>

Table 9.13

Objective	14: To reduce the need to travel, encourage sustainable transport options & make the best use of existing transport infrastructure.
Status	This objective will be used as part of the sustainability assessment of individual sites.
Commentary	This objective has been divided into two subsections:

Summary of the Site Assessment Sustainability Appraisal Process

Objective	14: To reduce the need to travel, encourage sustainable transport options & make the best use of existing transport infrastructure.
	<p>a) To reduce road congestion – Development which will significantly reduce congestion will rate well but those which add to it in a significant way will rate very poorly. Locations which enable / encourage walking and cycling e.g. through good footpaths links to services and facilities will rate well.</p> <p>b) To reduce the need to travel – Development which will significantly reduce the need to travel will rate well against the objective as will those in the main built-up areas where there is generally a good range of services and facilities. Those sites in locations which are remote from services and facilities, be this rural or built-up area, will rate poorly.</p>

Table 9.14

Objective	15: To ensure that the District adapts for the impacts of the changing climate.
Status	This objective will not be used as part of the sustainability assessment of individual sites.
Commentary	<p>Within Mole Valley the main consequence of climate change is considered to be flooding as a result of wetter winters and an increase in the occurrence of heavy rainfall, leading to flash flooding. This is considered under Objective 5: to minimise the harm from flooding.</p> <p>Other impacts of climate change on the District are likely to continue to be identified over time and the need to assess sites against this objective will be reviewed.</p>

Table 9.15

Objective	16: Provide for employment opportunities to meet the needs of the economy.
Status	This objective will be used as part of the sustainability assessment of individual sites.
Commentary	The Core Strategy seeks to support sustainable economic development through safeguarding and recycling accessible and well located industrial and commercial sites. It does not make specific provision for new employment land although there is support for mixed use schemes and those which in particular support the roles of Dorking, Leatherhead, the rural economy and the Gatwick Diamond. Proposals which would result in the loss of such sites will rate poorly against this objective. Those which would enhance the attractiveness and suitability of existing well located sites will rate well.

Table 9.16

Objective	17: Supports economic growth which is inclusive, innovative and sustainable.
Status	This objective will not be used as part of the sustainability assessment of individual sites.
Commentary	The Core Strategy seeks to support development of the District's strengths as a knowledge based local economy and encourages the establishment of new companies particularly those at the leading edge of new sectoral employment opportunities. It also seeks to improve the skills base of local residents especially where there is a significant disparity in the skills of residents and the types of job opportunities available. However, it is anticipated that this will be related to specific proposals rather than sites; and in most cases the results of the assessment is likely to be neutral or unknown. Only if there is a clear positive or negative impact will this be highlighted in the assessment. Factors such as the location of the site, and proximity to public transport etc, are adequately covered through other objectives.

Table 9.17

Objective	18: To achieve sustainable production and use of resources.
Status	This objective will not be used as part of the sustainability assessment of individual sites.

Summary of the Site Assessment Sustainability Appraisal Process

Objective	18: To achieve sustainable production and use of resources.
Commentary	Core Strategy Policy CS19 – Sustainable Construction, Renewable Energy and Energy Conservation will be used to ensure that all new buildings meet the relevant Code for Sustainable Homes or BREEAM construction standards. Therefore, as all new development will be built in accordance with national standards, there is unlikely to be significant variation between sites.

Table 9.18

Objective	19: To increase energy efficiency and the production of energy from low carbon, renewable sources & decentralised generation systems.
Status	This objective will be used as part of the sustainability assessment of individual sites.
Commentary	Core Strategy Policy CS19 will be used to ensure that all new buildings meet the relevant Code for Sustainable Homes or BREEAM construction standards. This must include a 10% reduction in total carbon emissions and there may therefore not be significant variation between sites. However the Council will also assess whether sites can contribute towards this Objective in a more positive way, particularly larger schemes or those that in combination achieve significant benefits.

Table 9.19

Green Belt Analysis and Broad Locations Assessments Objectives

9.6 A similar exercise has been undertaken to identify those objectives appropriate for the Green Belt analysis and sustainability appraisal assessment of broad locations. The following further summarises the use of the objectives for the work on the Green Belt Boundary Review Sustainability Appraisal.

Objective	1: To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.
Status	This objective will not be used as part of the sustainability appraisal of the broad areas of Green Belt land.
Commentary	There is an established housing requirement for the District and housing sites will be expected to include a mix of property sizes and incorporate affordable housing in accordance with the requirements of the Core Strategy. There is also a need to provide sites for Gypsies, Travellers and Travelling Showpeople and where possible, consider provision of housing suitable for the elderly. It is therefore assumed that all areas will score equally when assessed against the objective to provide housing.

Table 9.20

Objective	2: To facilitate the improved health and wellbeing of the whole population.
Status	This objective will be used as part of the sustainability appraisal of the broad areas of Green Belt land.
Commentary	This objective seeks to ensure that emphasis is placed on the need to provide places which contribute to the health and wellbeing of those living there. Ensuring that people have access to open spaces, green infrastructure and sports, recreational and play spaces and facilities which are safe and easily accessible by walking, cycling and public transport are key considerations. The assessment of an area against this objective will still also consider the more traditional assessment of access to health facilities and proposals which results in the loss of a health facility (such as a Doctors surgery) or the loss of / reduction in quality of, or access to open space, sports and recreation facilities without suitable mitigation will

Summary of the Site Assessment Sustainability Appraisal Process

Objective	2: To facilitate the improved health and wellbeing of the whole population.
	rate poorly. Those proposals which result in an increase in the level of / quality or access to health facilities, open space, sports or recreation facilities, particularly in areas identified as having a deficit of such facilities will rate very well. Proposals near to existing facilities will also rate well against the objective unless there is evidence of insufficient capacity.

Table 9.21

Objective	3: To reduce poverty and social exclusion.
Status	This objective will not be used as part of the sustainability appraisal of the broad areas of Green Belt land.
Commentary	<p>The 2010 Indices of Multiple Deprivation rank Mole Valley as 310th out of 354 Districts in England (354 being the least deprived). There are however areas of relative deprivation within parts of North Leatherhead and Holmwoods wards. Across the District it is estimated that 14.5% of households include a member with a disability.</p> <p>There are also areas with poor access, particularly by foot, cycle and public transport to services and facilities which can lead to the exclusion of some parts of the community, particularly in rural areas. The Core Strategy aims to direct most new development towards the most sustainable locations and the review of the Green Belt is only considering land adjoining the main built up areas and larger rural villages. In addition, the accessibility of sites to services and facilities is already assessed through Objective 5 so does not need to be considered again. The other aspects of this objective, such as addressing deprivation and improving participation in further education are not felt to be matters that can be realistically assessed as part of the assessment of the broad areas.</p> <p>Therefore only those areas for which there is a clear link between the development potential of the broad area and this objective will they be identified within these sustainability appraisals.</p>

Table 9.22

Objective	4: To minimise the harm from flooding.
Status	This objective will be used as part of the sustainability appraisal of the broad areas of Green Belt land.
Commentary	<p>In order to reduce the risk of flooding to any development, Core Strategy Policy CS20 states that the Council will not be seeking to allocate sites or permit development for housing in Flood Zones 3a or 3b. Land in Flood Zone 2 will only be considered if all other alternatives have been assessed and it has been demonstrated that they are unsuitable. Therefore all land within these flood zones has been removed from the assessment and will not be considered further. This will remain the case unless evidence is presented that the land is incorrectly categorised or that there are considerations, individual to that area, that mean it should be considered further. This will be undertaken on an individual site by site basis, should this issue arise.</p> <p>The assessment of flood risk will therefore take into account surface water and other sources of flooding such as small brooks and other water courses that might need further exploration.</p>

Table 9.23

Objective	5: To improve accessibility to all services, facilities, and natural greenspace. (for the purposes of this assessment, to ensure relevance, this objective will be entitled – Objective 5: To ensure accessibility to all services and facilities).
Status	This objective will be used as part of the sustainability appraisal of the broad areas of Green Belt land.

Summary of the Site Assessment Sustainability Appraisal Process

Objective	5: To improve accessibility to all services, facilities, and natural greenspace. (for the purposes of this assessment, to ensure relevance, this objective will be entitled – Objective 5: To ensure accessibility to all services and facilities).
Commentary	<p>The Council will use a range of information to make an assessment of the extent to which land in a broad areas meets or otherwise, this objective. Sites that are within easy walking / cycling distance of a wide range of services and facilities such as education, community and cultural centres will rate very well. Access to recreation (including natural greenspace) and health facilities has already been considered through the assessment of Objective 2 and will not be repeated.</p> <p>As this is an assessment of broad areas and not individual proposals, no consideration will be given at this stage to whether an area can contribute towards improving accessibility through for example the development of a new service or facility.</p> <p>It will be assumed that all development will contribute towards the provision of a number of services and facilities through the Planning Infrastructure Contributions or future Community Infrastructure Levy and it is therefore deemed that this applies equally to all areas.</p> <p>Access to employment opportunities will not be considered as part of this objective as it is included in the assessment of Objective 14.</p>

Table 9.24

Objective	6: To make the best use of previously developed land which is not of high environmental value and existing buildings.
Status	This objective will not be used as part of the sustainability appraisal of the broad areas of Green Belt land.
Commentary	The re-use of a piece of previously-developed land or existing buildings will rate more favourably than the development of a greenfield site. However, on the whole, all areas being considered through this process are greenfield and therefore all will score equally against this objective.

Table 9.25

Objective	7: To reduce land contamination and safeguard soil quality and quantity.
Status	This objective will not be used as part of the sustainability appraisal of the broad areas of Green Belt land.
Commentary	<p>a) To reduce land contamination:</p> <p>There are not widespread areas of contaminated land covering large swathes of the District and this is therefore not a subject that lends itself to consideration or assessment at this broad level. In addition to this, in most cases the land being examined is greenfield where there is unlikely to be land contamination issues meaning that this element of the objective would be marked as not applicable.</p> <p>This is therefore an issue that will be considered on a site by site basis and not at this stage of broad level assessment.</p> <p>b) To safeguard soil quality – Agricultural land is classified into five grades. Grade 1 is the best quality and Grade 5 is the poorest quality. Development of land classified as agricultural Grade 1 or 2 will rate poorly as such a proposal will fail to protect the best and most versatile land. There is no Grade 1 agricultural land and only one parcel of Grade 2 land (south of Bookham) in the District. It is therefore assumed that all broad areas will score equally when assessed against the objective to safeguard soil quality and quantity. The assessment of soil quantity stems from concerns about soil erosion; however, no parts of the District have been identified as suffering from such damage and as a result an area by area assessment of the risks will be of limited value and would be based on poor information / conjecture.</p>

Table 9.26

Summary of the Site Assessment Sustainability Appraisal Process

Objective	8: To ensure air quality continues to improve.
Status	This objective will not be used as part of the sustainability appraisal of the broad areas of Green Belt land.
Commentary	<p>There will be an increase in car use and a decrease in air quality through new development however the overall impact is likely to be negligible. It is also likely that many residents of new housing or indeed employees of new business are already working or living in the District and already using a car. Air quality limits within the District are currently not being breached.</p> <p>As this is an assessment of broad areas it would be assumed that development proposals will add to the background level of air pollution to the same extent and score equally when assessed against this objective.</p> <p>Those areas adjoining the M25 for which air quality may be an issue will be identified within the appraisal. In addition to this, air quality could be reduced where there are consistent issues of congestion. Broad areas of Green Belt land that may be subject to such impacts are identified through the consideration of Objective 14.</p>

Table 9.27

Objective	9: To reduce noise pollution.
	(for the purposes of this assessment, to ensure relevance, this objective will be entitled – Objective 9: To reduce level of, and exposure to, noise pollution).
Status	This objective will be used as part of the sustainability appraisal of the broad areas of Green Belt land.
Commentary	<p>This objective has been divided into two subsections to help with any assessment:</p> <p>a) To reduce the level of noise pollution. Proposals which will result in the loss of a considerable source of noise pollution will rate well against this objective. However, this study is an assessment of broad areas, not individual development proposals so at this stage it would be assumed that all development proposals will add to the background level of noise pollution to the same extent and would as a result score equally when assessed against this objective.</p> <p>b) To ensure people are not exposed to unacceptable levels of noise – The M25 passes through the northern part of the District and high numbers of vehicles also travel along the A24 and A25. Railway lines also cross the District and the south east is affected by Gatwick Airport. Some 260ha of the District is in an area affected by noise whereby permission for new homes will not normally be granted. Therefore areas that are subject to noise related issues will score poorly against this objective. The Council will use the noise exposure categories set out in the Mole Valley Local Plan 2000 and the DEFRA Noise Maps.</p>

Table 9.28

Objective	10: To reduce light pollution.
Status	This objective will be used as part of the sustainability appraisal of the broad areas of Green Belt land.
Commentary	<p>This objective has been divided into two subsections to help with any assessment:</p> <p>a) To reduce the level of light pollution - Proposals which will result in the loss of a considerable source of light pollution will rate very well against this objective. However, it is anticipated that most proposals (the majority of which are expected to be for residential schemes on greenfield sites) will result in some increase in the level of light. These sites are likely to add, even if only in a small way, to light pollution due to the safety requirements for street lighting and the general urbanising effects of development. Consideration will be given to the impact of lighting, taking into account the landscape, sloping or exposed nature of the location and the general backdrop against which it would be viewed - would it be against an existing urban area or is it more rural and therefore dark?</p>

Summary of the Site Assessment Sustainability Appraisal Process

Objective	10: To reduce light pollution.
	b) To ensure people are not exposed to unacceptable levels of light – Broad areas which are adjacent to major sources of light pollution particularly those that may continue on throughout the night (such as a major industrial site operating on a 24 hours basis) will rate very poorly against this objective. It is anticipated that most areas will be considered to be neutral.

Table 9.29

Objective	11: To improve the water quality of rivers and groundwater, and maintain an adequate supply of water.
Status	This objective will be used as part of the sustainability appraisal of the broad areas of Green Belt land.
Commentary	<p>Broad areas which have the potential to have an impact on water quality, e.g. those above a groundwater source protection zone, will rate more poorly at this stage than those that do not.</p> <p>Those areas through which there are no water courses or groundwater issues will score well.</p> <p>As part of any consultation the Council will consult with utilities providers. Through previous consultations no issues with water supply have been identified and it is therefore assumed that an adequate supply of water can be provided to all potential sites without unacceptable damage.</p> <p>This assessment is the starting point, when specific development proposals are being considered a more detailed assessment can be made which will take into account the actual type of development and any mitigation or indeed improvements that can be made.</p>

Table 9.30

Objective	12: To conserve and enhance biodiversity and networks of natural habitat.
Status	This objective will be used as part of the sustainability appraisal of the broad areas of Green Belt land.
Commentary	<p>Core Strategy Policy CS15 states that biodiversity will be protected and enhanced in accordance with European and National legislation / guidance. Therefore all land identified of ecological importance e.g. SSSI, SNCI, LNR, ancient woodland etc, has been removed from the assessment and will not be considered further. This will remain the case unless evidence is presented that the land is incorrectly categorised or that there are considerations, individual to that area, that mean it should be considered further. This will be undertaken on an individual site by site basis, should this issue arise.</p> <p>The assessment of biodiversity will therefore principally take into account whether there are features within the area that may have biodiversity potential; whether the area is in close proximity to protected sites and whether there is potential to link habitats. Due to the lack of detailed information available, at this strategic level the precautionary principle will be applied in many cases and a cautious assessment made.</p>

Table 9.31

Objective	13: To conserve and enhance landscape character and features, the historic environment and cultural assets and their setting.
Status	This objective will be used as part of the sustainability appraisal of the broad areas of Green Belt land.
Commentary	<p>This objective has been divided into three subsections to help with any assessment:</p> <p>a) To conserve and enhance the landscape character – Broad areas which include land designated for its national value such as the AONB will score poorly. Broad areas will be compared with the key features of the Landscape Character Area in which it falls. This will be used as a benchmark in order to identify whether the broad area is typical of that character area or otherwise and whether it is of poor or good quality.</p>

Summary of the Site Assessment Sustainability Appraisal Process

Objective	13: To conserve and enhance landscape character and features, the historic environment and cultural assets and their setting.
	<p>b) To conserve and enhance the historical environment – Development which would significantly improve or protect such environments or properties will rate very well. However, this study is an assessment of broad areas, not individual development proposals so an assessment of this type can not be made at this stage. However the assessment will highlight if the broad area is covered in full or part by a Conservation Area and whether there are any other historical features that can be identified. Due to the lack of detailed information available, in particular in relation to actual development proposals, at this strategic level the precautionary principle will be applied and a cautious assessment made.</p> <p>c) To conserve and enhance cultural assets – Development which would ensure the long term future of the Districts cultural assets will rate very well. However, this study is an assessment of broad areas of Green Belt land, not individual development proposals so an assessment of this type can not be made at this stage. It is anticipated that most schemes will have no or an immeasurable impact and will be considered as neutral.</p>

Table 9.32

Objective	14: To reduce the need to travel, encourage sustainable transport options and make the best use of existing transport infrastructure.
Status	This objective will be used as part of the sustainability appraisal of the broad areas of Green Belt land.
Commentary	<p>Broad areas of Green belt land which are in, or near to, areas that are identified as suffering from congestion will be identified and will score more poorly at this stage. However areas which enable / encourage walking and cycling e.g. through good footpaths linking a collection of services and facilities, will rate well.</p> <p>In addition, in order to assess the objective 'to reduce the need to travel', broad areas that are near to sources of employment will also be identified and will score well.</p>

Table 9.33

Objective	15: To ensure that the District adapts to the impacts of the changing climate.
Status	This objective will not be used as part of the sustainability appraisal of the broad areas of Green Belt land.
Commentary	It is considered that all broad areas will score equally when assessed against this objective. Issues such as access to transport, services and facilities which will be a key factor in the sustainability of any development and the risk of flooding (identified as one of the main impacts of climate change in the District) are assessed as part of the consideration of other objectives. Helping communities to be more resilient in order to withstand major weather events is not locationally specific.

Table 9.34

Objective	16: Provide for employment opportunities to meet the needs of the local economy.
Status	This objective will not be used as part of the sustainability appraisal of the broad areas of Green Belt land.
Commentary	The aim is to assess broad areas (as originally identified through the Green Belt Boundary Review) for their development potential. It is not the purpose of this strategic assessment to consider the sustainability issues of specific development proposals, nor is it possible at this level to consider how the development of an area might for example encourage rural diversification, encourage diversity and quality of employment or provide for the needs of local business. It is therefore assumed that at this level all areas will score equally when assessed against the objective to provide for employment opportunities.

Summary of the Site Assessment Sustainability Appraisal Process

Objective	16: Provide for employment opportunities to meet the needs of the local economy.
	Only those broad areas for which there is a clear, generally physical, barrier to development for employment purposes will these be identified in these sustainability appraisals.

Table 9.35

Objective	17: Support economic growth which is inclusive, innovative and sustainable.
Status	This objective will not be used as part of the sustainability appraisal of the broad areas of Green Belt land.
Commentary	The Mole Valley Core Strategy seeks to support development of the District's strengths as a knowledge based local economy and encourages the establishment of new companies particularly those at the leading edge of new sectoral employment opportunities such as sustainable development. Proposals which support this and are innovative would rate well against this objective; however it is not the purpose of this strategic assessment to consider the sustainability issues of specific development proposals and therefore it is assumed that for the purpose of this assessment of broad areas of Green Belt land all will score equally unless specific issues are identified.

Table 9.36

Objective	18: To achieve sustainable production and use of resources.
Status	This objective will not be used as part of the sustainability appraisal of the broad areas of Green Belt land.
Commentary	In order to assess this objective consideration is given to issues such as how development might help reduce the environmental impact of products or services, encourage self-sufficiency, increase residents awareness of environmental issues and promote the reuse and recycling of materials. On the whole, the deliverability of this sustainability objective is not locationally specific and therefore it is assumed that for the purpose of this assessment all areas will score equally

Table 9.37

Objective	19 To increase energy efficiency and the production of energy from low carbon technologies, renewable sources and decentralised generation systems.
Status	This objective will not be used as part of the sustainability appraisal of the broad areas of Green Belt land.
Commentary	In accordance with Core Strategy Policy CS19 all development will need to result in a 10% reduction in total carbon emissions through the on-site installation and implementation of decentralised and renewable or low-carbon energy sources. Energy efficiency and the production of energy from low carbon sources / renewables in particular is expected to increase. This should occur no matter where the development takes place and at this strategic level it is assumed that all areas will score equally.

Table 9.38

Data Health Warnings:

- 9.7 Flooding:** References to reports of surface water flooding may be as a result of a single incident / blocked drain or a consistent problem relating to drainage capacity. .
- 9.8** References to risk of surface water flooding as a result of Environment Agency work is indicative of a theoretical risk which may or may not manifest itself. It is based on generally topographical survey work and may indicate where there may be drainage issues. If there is a combination of actual surface water flooding incidents and EA areas at risk then this should be considered in more detail as it is likely to indicate an actual and persistent issue rather than a theoretical risk.

Summary of the Site Assessment Sustainability Appraisal Process

- 9.9 Noise:** The assessment of noise is based upon both site visits and the DEFRA Noise Mapping. These maps are available online and are only intended to be used for the strategic assessment of noise exposure in different areas. They should not be used to attempt to determine, represent or imply the noise exposure in individual locations (i.e. individual houses, windows). The data available covers the impact of major roads, railways and airports. In Mole Valley the main noise generators are the M25 and other significant roads, and Gatwick Airport. Railways and industrial areas are not significant generators of noise and no noise contours relating to Heathrow Airport are shown to cover Mole Valley on the DEFRA mapping and this is not felt to be a significant issue.
- 9.10 Distances:** When distances from facilities are given within the analysis, these are approximate and based on the most likely pedestrian route. When this is not the case this is indicated.

The Assessment "Scoring" System

9.11 The following scoring system has been used:

(++)	(+)	(0)	(-)	(- -)	?
Major Positive	Minor Positive	Neutral / negligible	Minor negative	Major negative	Unsure / Uncertain impact

Table 9.39

- 9.12 The system for the assessment of broad locations has used the "major positive" to "major negative" phrasing as being a more generally descriptive approach.
- 9.13 There may be circumstances where a site receives a 'major negative' score for one or more of the sustainability objectives but the site is still considered to be suitable for allocating. Justification will be provided if this occurs. Where appropriate commentary is made to explain the rationale for the score or with regard to mitigation. The impacts have been assessed with regard to frequency, duration and cumulative effects in accordance with the European Directive.

Chapter 10 Screening of minor Green Belt Revisions

Introduction

10.1 During the Green Belt boundary review consultation (Jan/Feb 2013), a number of representations were received, proposing relatively minor “tidying up” amendments to the existing Green Belt boundary, which are not associated with any specific development proposal. The Core Strategy also commits the Council to reviewing the boundaries of the Larger Rural Villages and Smaller Rural Villages.

Minor Revisions to The Green Belt Boundary

10.2 The Council is therefore proposing a set of minor amendments to the Green Belt boundary arising from:

1. The commitment to reviewing the boundaries of the Larger Rural Villages and Smaller Rural Villages, as part of the Land Allocations Plan (see supporting text to Core Strategy policy CS2).
2. In some locations, landowners or interested parties have requested a specific amendment to the Green Belt boundary, in representations on the Green Belt boundary review consultation in Jan / Feb 2013, but not in connection with any proposed site allocation.
3. In other areas, built development has taken place in the Green Belt, on the edge of existing settlements, as a result of very special circumstances which outweighed the presumption against inappropriate development. In such locations, it is appropriate to review whether the Green Belt boundary should be moved to reflect current circumstances on the ground.

10.3 A map-based exercise has been undertaken to identify all locations where the existing boundary may be out of date, or otherwise not in accordance with current guidance. The Council’s approach has been guided by the NPPF (para 85), which states that when defining boundaries, local planning authorities should:

- ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- not include land which it is unnecessary to keep permanently open;
- where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;
- satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period;
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

10.4 Five criteria have been drawn up for Minor Green Belt Boundary Changes:

1. The Green Belt boundary should be clearly-defined on the ground using physical features that are readily recognisable and likely to be permanent.

Screening of minor Green Belt Revisions

2. Where the existing Green Belt boundary cuts through the curtilage of a residential or other property, it should be adjusted to follow the property boundary unless the inclusion of additional land would clearly compromise the purposes of including land in the Green Belt.
 3. In general, the settlement boundary should include any areas where there is continuous built development on both sides of a street, unless the amount of space around the existing buildings on one or both sides of the street is such that the open character of that part of the village makes an important contribution to the openness of the Green Belt.
 4. Single properties should only be excluded from the inset area if there are clear grounds to distinguish them from neighbouring properties, based on grounds relating to the purposes of including land within the Green Belt.
 5. Land should not be included in the Green Belt for reasons which relate to other planning issues (such as conservation area or village character issues) which can be controlled using other policies.
- 10.5** In the above criteria, the “purposes of including land within the Green Belt”, refers to the following three purposes, which also formed the basis of the District-wide Green Belt review:
- 10.6 Merging:** To what degree does this land prevent neighbouring towns/villages merging into one another?
- 10.7 Encroachment:** To what degree does this land assist in safeguarding the countryside from encroachment?
- 10.8 Setting & Character:** To what degree does this land preserve the setting and special character of historic towns and villages?

Built Up Areas and Larger Rural Villages

- 10.9** The criteria have been applied to the Green Belt boundaries around the following settlements: Dorking, Leatherhead, Fetcham, Beare Green, Brockham, Cape, Charlwood and Hookwood. These are the built up areas and larger rural villages which are inset from the Green Belt. The Neighbourhood Planning Areas of Ashted, Bookham and Westcott have not been included. However, advice will be sought from each of the Neighbourhood Forums as part of their Green Belt Review work.
- 10.10** The issue is whether the existing Green Belt boundary in this location correct, when considered against the guidance in the NPPF and the purposes of including land within the Green Belt. There are about 50 locations where a potential minor anomaly has been identified in the Green Belt boundary.

Small Rural Villages

- 10.11** The Small Rural Villages are identified in Core Strategy policy CS1, as follows: Betchworth, Boxhill, Leigh, Mickleham, Newdigate, Ockley, South Holmwood, Strood Green, Westhumble and Woodlands Road, Bookham
- 10.12** The boundary of the Small Rural Villages serves a different function from the boundary of the Built Up Areas and the Larger Rural Villages. The Green Belt washes over these villages, so the boundary shown on the Proposals Map is not a Green Belt boundary. Rather, it is a boundary which was defined in order to support the Council’s policy that development in these villages would be limited to “infilling only on previously developed land” (Core Strategy policy CS1 and CS2). “Infilling” is defined as “the development

of a small gap in an otherwise continuous built-up frontage or the small scale redevelopment of existing properties within such a frontage". The settlement boundary therefore identifies previously developed areas, within which there is sufficient "continuous built-up frontage" to support this policy.

- 10.13** There are several instances where the smaller rural village boundaries bi-sect properties with large garden areas. However, these are cases where development in the garden would not be consistent with the definition of infilling as set out above. In general, the gardens in question are either of sufficient size that they could not be regarded as a "small gap" in the built up frontage, or they are in a backland location, where development would not be classed as infill.
- 10.14** The issue is whether the existing village boundary correctly identifies the extent of previously developed areas, within which there is sufficient "continuous built-up frontage" to support infilling as defined in Core Strategy policies CS1 and CS2, without compromising purposes of the Green Belt.
- 10.15** All the smaller rural village boundaries have been reviewed. For the most part, it is considered that the boundaries as currently defined continue to define appropriate areas to support the implementation of policies CS1 and CS2. However, there are a small number of exceptions. The supporting document "Green Belt Boundary Review: Minor Boundary Changes" identifies about 10 locations where a potential anomaly has been identified in the smaller village boundaries. The Neighbourhood Planning Area of Ockley has not been included. However, advice will be sought from the Parish Council as part of their Green Belt Review work.

Screening Summary

- 10.16** The information, above, regarding the purpose, criteria used, and extent of the proposed Green Belt revisions clearly indicates that these revisions are all of a minor nature. The introduction refers to these as "tidying up" amendments.
- 10.17** The purposes of sustainability appraisal and strategic environmental assessment is to consider matters which individually or cumulatively may be considered to be strategic, or potentially strategic in scope and have significant environmental impacts. In particular, Article 3 of the European Directive (2001/42/EC) states that an environmental assessment is required for plans and programmes which are likely to have significant environmental effects. Paragraph 3 of Article 3 states that plans and programmes which determine the use of **small areas at a local level and minor modifications to plans** only require assessment where they are likely to have significant environmental effects.
- 10.18** The Council believes, having regard to the commentary above, that the proposed minor revisions do not give rise to significant environmental effects or impacts and do not require to be subject to sustainability appraisal or strategic environmental assessment.

Chapter 11 Relationship to the Neighbourhood Development Plans in the District

Introduction

- 11.1 Neighbourhood Development Plans (NDPs) are being prepared in Bookham, Ashted, Westcott and Ockley. Those "forums" preparing the Bookham, Ashted and Westcott Plans are undertaking an assessment of the Green Belt within their areas and are then submitting their recommendations to the Council. It will then be the Council's responsibility to bring together the findings of its own Green Belt review which has been carried out in areas not covered by NDPs with the recommendations from the Neighbourhood Forums. This will ensure the Green Belt review is comprehensive and consistent across the District and will be compliant with the requirements of the National Planning Policy Framework.
- 11.2 The Neighbourhood Forums have undertaken a range of consultations and 'call for sites' and are assessing land that has been put forward to them for consideration as part of the preparation of the NDP's.

Commentary

- 11.3 The National Planning Policy Framework practice guidance indicates that there is no legal requirement for a neighbourhood plan to have a sustainability appraisal. However it does indicate that there may be some limited circumstances where a neighbourhood plan could have significant environmental effects and require strategic environmental assessment. For example where a neighbourhood plan proposes to allocate sites for development or where the neighbourhood plan contains sensitive natural or heritage assets which may be affected by proposals. There may also be instances where a neighbourhood plan could have other significant environmental effects which have not been considered through a sustainability appraisal of the local plan.
- 11.4 Prior to the publication of the NPPF practice guidance the Council held a sustainability appraisal workshop with the 4 localities preparing neighbourhood plans. The purpose was to advise the forums that although sustainability appraisal was not required that there were merits in doing so. In particular:
- To identify contextual and baseline information which would underpin the plan.
 - It assists the generation of options or strategies.
 - It provides a clear audit trail.
 - It assists the assessment of sites.
- 11.5 On this basis the Council has advised the forums that the sustainability appraisal process will help them with plan preparation even though there may be no legal requirement to do so.

Chapter 12 Conclusions

Conclusions

- 12.1** This overarching sustainability appraisal report (SAR) identifies that the sustainability appraisal of the strategic issues which underpin the Housing and Traveller Sites Plan have already been carried out through the sustainability appraisal of the Core Strategy. This SAR indicates that no new strategic or significant matters have arisen which would require new appraisal.
- 12.2** The SAR has therefore not followed the approach of appraisal of issues, options and alternatives. Instead the report provides the evidence that the strategic assessment has already been carried out and does not need to be repeated. This has been done by reference to the Core Strategy SAR and the linkages between the Core Strategy policies and goals, and the delivery of the established housing requirement. It has also been necessary to evidence that new baseline information and changes to national policy have not changed the conclusions of previous sustainability appraisal work.

Next Steps

- 12.3** This report together with the sustainability appraisal of the broad locations and potential sites, and the Council's responses to comments received can be combined and revised to form a SAR to accompany the submission Housing and Traveller Sites Plan.

Monitoring

- 12.4** Article 10 of the European Directive sets out the requirement to monitor the significant environmental effects of the implementation of plans, to identify unforeseen adverse effects and to take remedial action. It acknowledges that existing monitoring arrangements may be used, if appropriate, with a view to avoid duplication of monitoring.
- 12.5** The Core Strategy includes a monitoring framework which provides the basis for the authority monitoring report (AMR). This focuses on the achievement of delivering sustainable development, and the other impacts and trends of policy delivery. Specifically the monitoring framework has regard to whether the strategy and policies of the Core Strategy and subsequent Plans (now including the Dorking Town Area Action Plan) are delivering the intended outcomes of policy targets and appropriate sustainability indicators.
- 12.6** The AMR comprises of a 'bundle' of indicators which monitor the significant environmental, social, and economic effects within the overall themes of the Goals of the Core Strategy. The intention is to monitor whether sustainable development is being delivered and whether the policies are achieving their intended "direction of travel". The submission Housing and Travellers Sites Plan and accompanying final SAR will identify appropriate additional monitoring and sustainability indicators for inclusion in subsequent AMR's.