

Elizabeth Brigden
Planning Policy Manager
Crawley Borough Council

31 January 2024

Dear Elizabeth Brigden

Crawley Borough Local Plan 2040 - Post Hearings Advice

1. As discussed at the hearing session on 16 January 2024 we are setting out in this letter our initial preliminary findings on a number of strategic soundness matters. This letter does not address every issue raised through our matters, issues and questions document and our report will provide a more comprehensive assessment of overall plan soundness. In this letter and in the attached appendix we seek to clarify the proposed main modifications that would be necessary for plan soundness.
2. As a starting point, we are satisfied that the preparation of the submitted Plan has met the legal requirements of the Duty to Cooperate. We will set out our reasoning on this in full in our report. Consequently, this letter focuses on key matters of plan soundness only.

Plan Period

3. The end date of the submitted plan is sound and would provide the required 15 year horizon for strategic policies on plan adoption as required by NPPF paragraph 22. As discussed at the hearings, we recommend that the base date of the Plan is clarified as 1 April 2023, so that the plan period is clearly 2023/24 to 2039/40. This would align with the submitted evidence base and would be supported by the revised housing land and employment land trajectories. The ramifications of this would be to address an additional year's housing need (755dpa) with corresponding updates to Policy H1 in terms of both housing need and the supply-led housing requirement. Following the Part 1 hearings the Council has reflected on this and in general terms we consider that the relevant changes that the Council has proposed would be necessary for plan soundness.

Housing Requirement and Land Supply

4. Given the clear constraints facing the Borough, the submitted plan's approach of presenting the housing requirement as a supply-led figure would be sound. We are satisfied that plan preparation has sought to optimise housing delivery as far as is practicable. In particular, we consider the Plan provides a positively prepared framework to support the revitalisation of the town centre as a neighbourhood for approximately 3,000 homes over the plan period. We will deal with this in more detail in our report but, ultimately, we find the Plan would be consistent with national planning policy, positively prepared and justified in accommodating approximately

42% of the Borough's housing need over the plan period. No major sources of potential housing supply have been omitted and the proposed significant uplift in the windfall allowance would be justified.

5. Various main modifications would be required to the housing requirement in Policy H1 (and as expressed in Policy H2) to reflect the amended plan period. We are satisfied that the housing requirement should be increased from a minimum 5,030 net dwellings to 5,330 to reflect supply capacity. The additional year in the plan period will have consequential implications for the scale of unmet housing need which will increase from 7,050 dwellings to 7,505 over the plan period.
6. The extended plan period and other factual amendments have generated proposed modifications to the housing trajectory. In summary, the proposed modifications to step the trajectory from 386 dwellings per annum for years 1-10 to 210dpa in years 11-17 would be necessary for plan soundness. We will set out our full reasoning for this in our report. In taking this approach and noting the 10% buffer (as sought in accordance with NPPF paragraph 74b), the latest evidence on the delivery profile of individual sources of housing supply indicates there would be a five-year deliverable supply on plan adoption against the plan's amended housing requirement. There would also be a strong prospect of the housing requirement being met during the mid period of the plan (years 6-11). Taking account of the latest housing trajectory [PS/H/HD/14] we see no reason to further amend housing site capacities or the profile of delivery.

Employment Land Requirement

7. We find the output of the latest Economic Growth Assessment in terms of informing a minimum land requirement of 26.2 hectares (ha) for the plan period to be an appropriate strategy for the Borough. Given the uncertainty with the economic impact of Covid-19, which has been acutely experienced in Crawley's economy, we are clear that the 26.2 ha figure must be regarded as a minimum and the plan must provide for sufficient flexibility given the significance of Crawley to the wider Gatwick Diamond economy. Given the alternative evidence on the need / demand for large footprint distribution and logistics uses and the relatively fragmented nature of some of the existing employment land supply, we consider the plan would need to be modified to be more positively prepared. The principal way to do this would be a more positive approach to the 44ha of allocated strategically employment land at Gatwick Green (Policy EC4) and we set out our recommendations below.
8. During the examination the employment land trajectory for the plan period has been revisited and a factual correction in relation to land at The Base, Fleming Way is necessary. Accordingly, the minimum residual employment land requirement that would need to be met by newly allocated land would be 17.93ha. This will necessitate various modifications to Policies EC1 and EC4 for plan soundness.

Gatwick Airport

9. Overall, we find the Plan's general approach to Gatwick Airport to be sound, albeit matters of detail will need to be addressed. On the fundamental issue of the need to safeguard land to deliver an additional wide-spaced runway we consider the combination of the 2019 Airport Masterplan and the ongoing process of clarifying the need for additional runway capacity in the south-east as instigated through the 2018 draft Aviation Strategy 'Aviation 2050: The Future of UK Aviation' (which postdates the Airports National Policy Statement (June 2018)) to meet a minimum threshold for the 'robust evidence' required by NPPF paragraph 106 c) for safeguarding. We address the extent of safeguarded land below, but we are satisfied at a strategic level that the submitted plan strikes an appropriate balance between safeguarding land that would be critical for an expanded Gatwick Airport and the ability to accommodate much needed employment land in the wider public interest.
10. If ongoing processes on national aviation policy do not reach a positive conclusion that additional wide-spaced runway provision at Gatwick Airport is needed, then we agree with the Borough Council that this would trigger a plan review. This is recognised at paragraph 1.36 of the submitted plan. Accordingly, we do not consider it necessary for soundness to include a specific plan review policy.
11. In terms of the extent of safeguarded land, we find the approach to land east of Balcombe Road and bounded by the M23 and M23 spur road to be sound. This area is shown in the 2019 Airport Masterplan (linking back to the 2014 Operational Efficiency Master Plan¹ as considered by the Airports Commission) as being predominantly for surface car parking and highway infrastructure. Whilst we accept the principle of safeguarding is supported by national policy, we do not accept that the previous work informing the Airports Commission assessment, or the relatively high-level nature of the 2019 Airport Masterplan necessarily fix the extent of land needed for safeguarding. That is a role for plan-making. In our view, the Borough Council was entirely reasonable to scrutinise the available evidence and arrive at its own conclusion as to whether the evidence was robust as to whether land previously safeguarded in the 2015 Local Plan remains "critical" in developing infrastructure to widen transport choice and to provide for large scale transport facilities.
12. Our report will address in detail the evidence on car parking required for a fully operational additional wide-spaced runway and the residual safeguarded land available. At this stage of the examination, we consider that there is significant flexibility around how the car parking demand could be provided (having regard to the likely timeframe for incremental implementation of a second wide-spaced runway project). Overall, on the evidence we have read and heard, we are satisfied that there remains sufficient scope to efficiently accommodate parking demand for an expanded airport within the

¹ Including Paragraph 3.7

safeguarded land identified the submitted Plan. Reference has also been made to the need for potentially some 35ha to relocate existing employment uses that may be displaced by a second wide-spaced runway. Again, we will address this in our report but our consideration of the matter to date does not lead us to conclude that the safeguarded land area shown in the submitted Plan needs to be modified for plan soundness in this regard.

13. Overall, at this stage of the examination, we find that the submitted plan retains safeguarding to land, which in our view, would be “critical” to implementing a second wide spaced runway and associated development and infrastructure if a need for expanded runway capacity in the south-east were to be established through ongoing processes.
14. In terms of the impact of the proposed continuation and slight extension to the safeguarded land area adjacent to and within the sub-regionally important Manor Royal employment estate, we are satisfied that the extent of safeguarded land needed for a second wide-spaced runway is justified in this location. In coming to this initial view, we have had regard to, amongst other things, the 2019 Airport Masterplan, necessary safety separation distances between parallel runways, required perimeter provision and a realigned A23. Having found the principle of safeguarding to be sound, we consider there is no need for plan soundness to amend the safeguarding boundary at the fringes of Manor Royal.
15. In terms of the proposed policy framework for Gatwick Airport, we consider the Plan would be sound in terms of providing a positive framework for the sustainable growth of the Airport with the existing single runway configuration. We recognise the current Development Consent Order (DCO) process for the Northern Runway Project at the time of this examination. To a large extent the Plan was prepared significantly advance of this project (plan submission being delayed due to the water neutrality issue). The DCO process has some way to go, and it is likely that the Local Plan examination will conclude significantly in advance of any outcome on the DCO. We consider Policy GAT1 provides an effective framework to manage proposals at the airport and so there is no reason to delay the adoption of this Plan. If the Northern Runway Project is approved, operational use is anticipated in 2029 (Year 6 of the Local Plan). Consequently, there would be sufficient time for a plan review to respond to the DCO outcome, if required.
16. With regards to safeguarded land, Policy GAT2 seeks to ensure that the ability to bring forward future airport development is not unduly fettered and so manages the scale of development that would normally be acceptable in this area. The Policy has evolved since the 2015 Local Plan to provide clarity on how it is to be implemented. Further changes for plan soundness are required to the policy and supporting text as set out in Schedule 7e², and as agreed with Gatwick Airport, to provide further clarity on what is meant by

² Document CBC.CLP.07e (The Council’s Schedule of Proposed Modifications) – Version 5, December 2023

“small-scale” and to acknowledge that some development may need to be permitted on a temporary basis.

17. The examination has received and heard appreciable submissions regarding Policy GAT3 (Airport related car parking), Policy GAT4 (employment uses at Gatwick) and the definition of the Airport boundary. We are not recommending any main modifications would be necessary for plan soundness on these matters and we will set out our reasoning for this in full in our final report.

Gatwick Green

18. In summary, having found the approach to safeguarded land sound, we find the principle of a strategic employment land allocation at Gatwick Green to be soundly based. We will set out more detail in our report, including the benefits of meeting employment needs within the Borough, why Gatwick Green would be an appropriate strategy compared to alternative options.
19. The land extent of the proposed allocation at Gatwick Green amounts to some 44ha. As set out above, the minimum residual employment land requirement would need to increase from 13.73ha to 17.93ha as a matter of soundness. Policy EC4 as submitted differentiates between accommodating the balance of the remaining minimum employment requirement and requiring demonstration through ‘appropriate evidence’ for the justification of any further industrial floorspace beyond this amount. From everything we have read and heard there is little dispute that the full 44ha site has been allocated in the submitted Plan. The site would need to be comprehensively master-planned such that the ultimate net developable area would be less than 44ha but more than 17.93ha. As such there would be capacity and flexibility at the Gatwick Green site to respond to changes in economic circumstances as per NPPF paragraph 82 d). Accordingly, we recommend for soundness that the second part of criterion a) is deleted so that the site is straightforwardly required to provide as a minimum the 17.93ha residual industrial land and for this to be predominantly for B8 storage and distribution use. We are satisfied that criterion b) in terms of ancillary uses at the site is sound.
20. We understand that transport implications have been assessed on permutations of floorspace figures depending on the transport intensity of end-users. We do not consider that further transport modelling would be required for plan soundness in light of our recommended modification to criterion (a). We agree that Policy EC4 should be amended so that the required Mobility Strategy will set out how a master-plan level vision for movement will be achieved (as per the ‘vision and validate’ approach endorsed in DfT Circular 01/22). This would link to ongoing work through the emerging Transport Infrastructure Management Group in terms of the Borough’s Infrastructure Delivery Schedule and understanding when anticipated transport mitigations may be required. Moreover, in addition to

transport modelling already undertaken in support of the submitted Plan³, criterion c) of Policy EC4 requires a transport assessment which would align with the required masterplan and phasing programme.

Water Neutrality (Policy SDC4)

21. The submitted plan proposes the limitation of water use in residential development to a lower rate than that set by national standards and guidance, together with stringent targets for other uses. It is proposed that similar standards would be adopted by neighbouring authorities. Together with an offsetting and mitigation scheme, the Plan is the first to set such ambitious targets and we are mindful that other authorities in the region are looking to this Plan to ensure that the scheme can be adopted across the water region.
22. We recognise that this is a novel approach and commend the Council and its working partners on developing a programme that is justified in view of the constraints facing the area. Whilst there are some building industry concerns regarding viability, these are balanced by a willingness to ensure that development can occur through the minimisation of additional harm to natural resources. As previously advised, we recommend that Policy SDC4 be made a strategic policy as a main modification. In addition, we also recommend the insertion of proposed criterion 7 to Policy SDC4 as a main modification to provide further clarification in the event that a strategic solution to water neutrality is secured through forthcoming water resource planning.

Policy H8 – Gypsy, Traveller and Travelling Showpeople

23. Whilst we have some reservations about the extent to which survey work has been able to identify gypsy and traveller households currently in bricks and mortar housing that may seek culturally appropriate accommodation during the plan period, we nonetheless find that the combination of positively allocating a developable and publicly owned reserve site of up to 10 pitches and a development management framework for smaller, individual proposals would be a prudent and justified approach for the particular circumstances at Crawley.
24. Given the nature of the Borough, there is a strong likelihood that individual proposals for gypsy, traveller and travelling showpeople accommodation will be in the small area of countryside between the existing urban edge of Crawley and Gatwick Airport. Given the frequency and pervasiveness of aircraft noise and the limitations on mitigation, together with the increasing body of scientific evidence on health impacts, we generally find the precautionary approach in Policy H8 to be justified, including the sequential noise thresholds. It is recognised that existing wording (currently Policy H5 in the 2015 Local Plan) has caused some implementation issues and so we

³ Including Crawley Transport Modelling Study TN03 Gatwick Green Trip Generation Comparison June 2023 (Stantec)

recommend the proposed wording to Policy H8 put forward by the Council in Schedule 7e as a main modification. This would provide further clarity on what would be meant by “long-term temporary” and “short term temporary” by reference to the higher 60db and 66db noise exposure levels respectively.

Allocated housing Sites (Policy H2)

25. Although the Plan does not include detailed individual housing site allocation policies, it does identify specific sites within Policy H2. Many of these are the subject of recent approvals or are at an advanced stage in the planning process. Overall, we consider the Council’s assessments of their ability to be delivered and/or developed to be appropriate. We are also satisfied that they have sufficient regard to the most recent Strategic Flood Risk Assessment.
26. The site at Tinsley Lane would provide sufficient facilities for Oakwood Football Club. We do not wish to provide any comment on matters within the extant outline application for planning permission. However, the possibility of provision for allotments within the site should remain in the policy in line with the adopted development brief, as we do not consider there to be sufficient justification for its removal.
27. We support the retention of Land to the east of Balcombe Road as a site allocated within Policy H2, as this provides the most deliverable option for rehabilitation and future management of the Local Wildlife Site.

Crawley Town Centre (including town centre housing sites)

28. Policy TC5 proposes a 500 square metres (sq.m.) threshold for requiring an impact assessment for competing uses outside of the town centre, as opposed to the default threshold of 2,500sq.m. in paragraph 90 of the Framework. The lower 500sqm threshold is informed by research using centres and circumstances with similar characteristics to those of Crawley, would be commensurate with Crawley’s ‘town centre first’ approach and with national policy. Complementary measures such as the appropriately defined extent of primary and secondary shopping frontages, the encouragement of town centre residential uses to a reasonably high density, and the recognition of the potential effects of changes of use within Use Class E, are all sound.
29. We also consider that the Plan’s approach to town centre opportunity sites and their development is sound. Other sites that may come forward during the plan period, including those benefitting from permitted development changes of use, would be sufficiently accounted for within the Plan’s ‘windfall’ figure. Planning of the Crawley College site would need to take account of local heritage and flood risk constraints, and we recommend main modifications to address the site’s master-planning, together with recognition of the differing characteristics of the northern and southern parts of the site.

Character, design, heritage and open space provision

30. The Plan supports a sustainable approach to development, specifying higher density ranges in appropriate locations, in recognition of the compact nature of the built-up area. Commensurate parking standards would also be applied across the borough in line with the approach adopted by West Sussex County Council. A flexible approach to open space provision specifies appropriate provision for various types of development and resists the loss of any space. Tall buildings are generally restricted by local aviation policy. Provision for access is also appropriate. Overall, we consider that the proposed policies would provide a suitable framework for design-led development in accordance with national planning policy.
31. Designated heritage assets would be differentiated from non-designated assets through the provision of locally listed buildings and areas of special local character. These designations are appropriate, having consideration to more locally specific assets that are important to local heritage but do not meet the criteria for statutory designation.
32. The main modifications proposed to specify proportionate requirements for various sizes of development proposals are welcomed.

Environmental protection

33. Having regard to the most recent iteration of the Council's Strategic Flood Risk Assessment we have no soundness concerns for the Plan's flood risk policies, other than the proposed clarifications to Policy EP1 (criteria iv) and v)) in Schedule 7e which we will need to recommend for soundness.
34. The Plan proposes to recognise the upper equivalent sound level of the Significant Observed Adverse Effect Level (SOAEL) for aviation noise as 60 decibels (dB LAeq.16hr), with an unacceptable adverse effect above this level. We recognise that the SOAEL is significantly below the 66db in the previous Plan. However, we consider this level to be appropriate in light of various research within the evidence base identifying noise constraints for development, including the design and use of outdoor spaces, the general nature of aviation noise, and circumstances specific to the operation of Gatwick Airport and its surrounding land.
35. The alternative of not having suggested levels and a bespoke approach to determining the appropriateness of applications for development would not be necessary for plan soundness. We consider the inclusion of the levels in Policy EP4 (and in large part carried into Policy H8) provides clarity and certainty for development. The proposed levels do not unreasonably restrict sites already allocated for development within the plan. They would provide some scope for development in areas within the SOAEL. We recommend the proposed clarifications to Policy EP4 and the Plan's Noise Annex, with regards to the approach within SOAEL as set out in Schedule 7e would be necessary for plan soundness.

Crawley Western Multi-Modal Link (Policy ST4)

36. Although the proposed link has not been included in previous plans, it has been a long-held aspiration of the Council and its partners to provide for future growth to the west of the Borough. Policy ST4 along with the Policies Map identifies the area of search which includes land within the area safeguarded for a potential future southern runway at Gatwick Airport.
37. This policy is intended to act as a high-level statement of intent to develop the link and to identify the area of search as shown on the Policy Map. It does not contain detail on the exact route, which is reserved for further study. Nonetheless, we find the policy, at a strategic, high-level to be sound. Whilst it does not specifically prevent development within the area of search, its non-inclusion in this Plan could result in development that inhibits a logical route from being constructed in future years.
38. For these reasons, we recommend that Policy ST4 is identified as a strategic policy. It has a cross-boundary dimension and relates to high-level infrastructure for transport (Framework paragraphs 21 and 20b, respectively).
39. The area of search is sufficiently flexible to take account of the various constraints identified within the evidence base and reasoned justification. Incursion within the Gatwick safeguarded area or on any other site does not necessarily mean that the route would prevent future development, given the further scoping and viability exercises that would need to be undertaken prior to any committed narrowing of the search area and detailed planning.
40. We support, and therefore recommend, main modifications proposed by various parties to strengthen the environmental considerations of the policy.

Next Steps – Finalising the Schedule of Main Modifications and consultation.

41. In general, because the submitted plan incorporates various policies that were found sound against the then NPPF in 2015, and the Council has undertaken three Regulation 19 exercises with attendant amendments at each stage, there are relatively few main modifications we would need to recommend for plan soundness, having found that many of the key components of the Plan (identified above) would be essentially sound. Various main modifications were discussed at the hearings, and we set out in the appendix to this letter those we consider would be necessary for us to recommend. As confirmed by the Council on plan submission in July 2023, a request for us to recommend main modifications has already been provided in accordance with Section 20(7) of the 2004 Planning & Compulsory Purchase Act.
42. We now invite the Council to finalise the schedule of proposed main modifications. Where there are a number of component changes to an individual policy (for example Policy EC4) we recommend that these are presented as one single composite main modification to the policy, rather

than a series of individually referenced modifications. As already provided in the December 2023 Schedule of Modifications (Version 7e), new text should be indicated by way of bold and underlined and text proposed for deletion should be struck through. In the column for 'reason' we would advise that reference be made to a relevant test of soundness, and we have provided a steer on this in the attached appendix to this letter.

43. We will need to see the schedule before it is consulted upon to ensure its contents align with the advice in this letter and there is complete coverage. We also recommend for transparency and completeness that a schedule of any proposed changes to the Policies Map is also published alongside the proposed main modifications (the 3 proposed changes presented in Schedule 7e).
44. For the avoidance of doubt, all other changes presented in the Council's Schedule 7e not referenced in this letter/appendix would be additional modifications (sometimes known as "minor mods") which are a matter entirely for the Council when finalising the content of your Plan for adoption. They are generally factual, presentational, and non-consequential changes which we do not need to recommend for soundness, and so they do not need to be consulted on.
45. The consultation on the proposed main modifications and accompanying schedule of Policies Map changes, together with any Sustainability Appraisal addendum and Habitats Regulations Assessment addendum (if required) must be for a period of at least 6 weeks. The consultation should extend to all statutory consultees and interested persons and not be limited only to those who made representations at the various Regulation 19 stages.
46. We trust this letter is of assistance. If you have any queries on its contents, please raise them with us through Charlotte and we will assist. Overall, we would like to commend the Local Plans team for the way in which you conducted yourselves at the hearings and assisted our enquiries and prepared for the examination more generally including the comprehensive written statements and key topic papers. This has enabled an efficient examination to date and gives us confidence that matters can now progress swiftly to consultation on the proposed main modifications.

Yours sincerely

Glen Rollings

David Spencer

Examining Inspectors.

Appendix A – Clarification of proposed main modifications

Plan (all references are to the Policy or paragraph number in the May 2023 proposed submission Plan)	Summary of Main Modification	Soundness Reason
Plan Period Paragraph 1.34 Paragraph 2.47 Paragraph 9.6	Clarification it would be 2023/4 to 2039/40	Effectiveness Justified
Plan Vision	Amend number of new homes to be built over plan period to 5,330	Effectiveness
Paragraph 2.19	Minimum employment land requirement figure amended to 17.93ha	Effectiveness
Paragraph 2.20 and Footnote 13	Amend housing need for plan period to 12,835 homes	Effectiveness
Paragraph 2.26	Amend scale of unmet housing need to 7,505 dwellings	Effectiveness
Policies CL2, CL3 and CL5	Clarifications to support sustainable travel and proportionate requirements for development proposals of varying sizes.	Effectiveness
Policy DD4 Tree Replacement Standards	Delete reference to strategic policy	Consistency with national policy
Policy IN1 – Infrastructure Provision	New paragraph to reference the Infrastructure Delivery Schedule and link through to Policy ST1, Transport Assessments and monitoring implementation within wider context of move to 'monitor and manage' rather than predict and provide	Effectiveness
Paragraph 8.9	New split paragraphs. Additional text on (nominally titled) Transport Infrastructure Management Group in paragraph 8.9 and clarification of use of CIL funds in paragraph 8.10	Effectiveness

Policy IN2 – Location and Provision of New Infrastructure	Insert reference to Infrastructure Delivery Schedule and amend for accessibility for major facilities by reference to public transport and/or active travel routes.	Effectiveness
Paragraph 9.15 Paragraph 9.23 & Table Paragraph 9.27 Paragraphs 9.53, 9.54 and 9.58	Updated basis on which to calculate residual minimum employment land requirement in light of latest employment land trajectory	Justified
Policy EC1 – Sustainable Economic Growth	Amend figures in the policy	Justified
Policy EC2 – Main Employment Areas	Amend policy to distinguish specific functions and roles of Manor Royal, Gatwick Green, Gatwick Airport and Crawley Town Centre as main employment areas by reference to location specific policies	Effectiveness
Policy EC4	Delete second part of criterion a) and amend minimum figure to 17.93ha Amend criterion d) as per Schedule 7e re. master plan level vision for movement and amend final paragraph re. vision-led approach as per Circular 01/22 Add new criterion f) – requiring a Construction Management and phasing plan	Justified Positively Prepared
Paragraph 9.58	Amend, as per Schedule 7e, to clarify that delivery of Gatwick Green is not confined to the latter part of the plan period.	Effectiveness
Paragraphs 9.76 & 9.77	Clarifications that measures other than financial contributions	Effectiveness

	will be considered in respect of employment and skills development (Policy EC5)	
Policy GAT1	Amend criterion (iii) re. biodiversity compensation	Effectiveness
Policy GAT2	Additional clarification on what is meant by 'Small-scale'	Effectiveness
Paragraph 10.19	Clarification to reasoned justification text to Policy GAT2 re. 'small-scale'	Effectiveness
New paragraph to follow existing paragraph 11.26	Clarification of the nature of the Crawley College masterplan and development, including recognition of the differing nature of the northern and southern parts of the site.	Effectiveness
New paragraph 11.43	Addressing the approach to changes of use within Use Class E	Effectiveness
Housing Vision	Amend number of new homes to be built over plan period to 5,330	Effectiveness
Policy H1 – Housing Provision	Amend housing requirement to reflect plan period clarification and amend stepped trajectory to reflect revised average housing completions (years 1-10 and years 11-17)	Effectiveness
Paragraph 12.39 and updates to footnote 108 (109)	Amend scale of unmet housing need to 7,505 dwellings	Effectiveness
Policy H2 – Key Housing Sites	Amend to reflect clarifications on Plan Period	
Paragraph 13.8	Amend to reflect outputs of GTAA update received during the examination	Justified
Paragraph 13.9	Amend to reflect outputs of GTAA update received during the examination	Justified
Policy H5 – Affordable Housing	Various amends to structure of policy; clarifications on C2	Effectiveness

	developments and use of the commuted sums calculator i	
Paragraph 13.40	To reflect the amendments to Policy H5	Effectiveness
Policy H8 – Gypsy, Traveller and Travelling Showpeople Sites	Criterion a. clarification on definitions	Effectiveness
Policy SDC4 Water Neutrality	Identify as a strategic policy. Amend criteria to include reference to South Downs National Park Authority and that offsetting would be required for infrastructure as well as development (for example schools). Addition of criterion 7 should higher standards for water neutrality not be required in the future.	Consistency with national policy Effectiveness
Policy EP1	Recognising the need for consideration of surface water and drainage (part iv). Clarify criterion v) regarding proximity of development to main rivers and ordinary watercourses.	Justified
Policy EP4	Various changes in relation to the SOAEL.	Justified
Policy ST4	Identify as a strategic policy. Alteration of criterion A, insert new criterion C re Gatwick safeguarded land and insert a new criterion D to identify potential impacts on protected sites and various habitats.	Consistent with national policy.
Paragraph 17.31	New paragraph identifying specific	Consistent with national policy.

	environmental constraints.	
Planning Obligations Annex		
Page 282	Clarifications re part (ii) of Policy EC5	Effectiveness
Page 284	Amendment to calculation	Effectiveness
Pages 285-6	Clarifications for affordable housing to align with modifications to Policy H5	Effectiveness
Parking Standards Annex		
Page 298	Amend Electric Vehicle Charging Infrastructure requirements	Justified
Noise Standards Annex		
Pages 307-312	Various changes in relation to the SOAEL and Unacceptable Adverse Effect levels including the insertion of figure 2.	Justified

Whilst it is not our role to examine the Policies Map, the following modifications to the Policies Map should be presented in a separate schedule alongside the proposed main modifications:

Policies Map Modification:	
Addition of the Brick Clay Resource Consultation Area (including buffer zone)	Consistency with West Sussex Joint Minerals Local Plan 2018 (Partial Review 2021).
Deletion of Safeguarded Railhead Buffer Zone	Mapping clarity.
Corrections to the viewpoints – Policy CL7	Mapping clarity and omissions