

CRAWLEY BOROUGH COUNCIL

**SUSTAINABILITY APPRAISAL /
STRATEGIC ENVIRONMENTAL
ASSESSMENT**

**Draft Sustainability Report for Consultation
with Local Plan Preferred Strategy**

October 2012

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1.0 INTRODUCTION

Sustainability Appraisal and Strategic Environmental Assessment

- 1.1 Under the regulations of The Planning and Compulsory Purchase Act 2004 Crawley must carry out Sustainability Appraisal (SA) of the Local Plan to satisfy independent examination and allow the Plan to be formally adopted. An EU Directive also requires that Strategic Environmental Assessment (SEA) is carried out to ensure that the environmental effects of the Plan are taken into account. The SA/SEA is an ongoing process, which attempts to identify the social, environmental and economic impacts of planning policies and allocations.
- 1.2 The SA/SEA process will consider the impacts of proposed development options on people's health, and covers the criteria of Health Impact Assessment. The Local Plan seeks to promote opportunities for all people in Crawley. The SA/SEA will also consider the potential effects of the Plan on people in respect of disability, gender and racial equality impacts, in light of the Equalities Act 2010.
- 1.3 This report outlines the sustainability issues and objectives for Crawley, for consideration during the review of the adopted Core Strategy (2008) and the preparation of the new Local Plan (Crawley 2029). The review will take into account the legislative framework, the National Planning Policy Framework, technical evidence and consultation feedback, and will result in a Local Plan for Crawley for the period 2014-2029.
- 1.4 The SA/SEA follows an iterative process, providing a view of the likely implications for sustainable development of different options for policy identified during the review of the Core Strategy. The findings of the scoping work have been taken into consideration when developing the preferred options for Crawley's Local Plan.

Structure of the draft SA/SEA Report

- 1.5 This draft SA/SEA preferred strategy report is structured as follows:
 - Section 2 provides the context and methodology employed for the preparation of the Sustainability Appraisal. The SA process is introduced and how the SEA requirements have been incorporated is explained.
 - Section 3 provides an overview of the Local Plan, including how the documents relate to each other and the timetable for the Local Plan process.
 - Section 4 includes a summary from the consultation on the scoping report and sets the Sustainability Appraisal topic areas for Crawley's Local Plan, including the Sustainability Objectives.
 - Section 5 provides a more detailed analysis of the social, environmental and economic effects of the policies included in the preferred strategy Local Plan against the Sustainability Objectives.
 - Section 6 provides the detail on the next steps of the SA/SEA process.

Consultation Arrangements

- 1.6 Consultation on this draft Sustainability Report is running alongside consultation on the preferred strategy Local Plan 2014-2029, and a Habitats Regulations Assessment Report. Feedback from the consultations will be used to inform the preparation of the Draft Submission Local Plan, Sustainability Report, and any further work on Habitats Regulations Assessment (HRA).

- 1.7 The document will be available for a six week public consultation period on Monday 22 October 2012. We welcome any comments on this Draft Sustainability Report. Should you wish to comment on the document, please do so on or before **5pm, Monday 3 December 2012.**
- 1.8 There are three ways in which representations can be submitted:
- Electronically using the dedicated webpage: www.crawley.gov.uk/crawley2029
 - Electronically by email to forward.plans@crawley.gov.uk
 - By post to Forward Planning, Crawley Borough Council, Town Hall, The Boulevard, Crawley, West Sussex, RH10 1UZ.
- 1.9 For further information about the Sustainability Appraisal and Strategic Environmental Assessment, please contact James Webster on (01293) 438450 or e-mail forward.plans@crawley.gov.uk
- 1.10 This Sustainability Appraisal/Strategic Environmental Assessment can be viewed on the council's website at www.crawley.gov.uk/crawley2029
- 1.11 Hard copies of the documents are also available to view at:

Town Hall: The Boulevard, Crawley, West Sussex, RH10 1UZ. Phone 01293 438000
Opening hours: Monday to Friday 8.30 am - 5.00 pm

Crawley Library: Southgate Avenue, Southgate, Crawley, RH10 6HG.
Phone 01293 651744. Opening hours: Monday to Friday 9.00 am -7.00 pm Saturday
9.00 am -5.00 pm

Broadfield Library: 46 Broadfield Barton, Broadfield, Crawley, RH11 9BA.
Phone 01293 543298 Opening hours: Monday – Friday 10.00am -5.00pm Saturday
10.00am -2.00pm

2.0 CONTEXT AND METHODOLOGY

Introduction to Sustainable Development

- 2.1 Sustainability is a difficult term to define. The most widely used definition is taken from the Brundtland Report, which was produced by the United Nations World Commission on Environment and Development in 1987. It defines sustainable development as:

"development that meets the needs of the present without compromising the ability of future generations to meet their own needs."

- 2.2 The aim of Sustainable Development therefore, is to enable everyone to satisfy their basic needs and enjoy a better quality of life, without compromising the quality of life of future generations. It is about considering long-term social, economic and environmental issues and impacts in an integrated and balanced way.

- 2.3 The UK's sustainability strategy was set out in the document 'A Better Quality of Life' (2005). This states that *'its task is to meet five objectives at the same time, in the UK and the world as a whole'*. These objectives are

- Living within environmental limits;
- Ensuring a strong, healthy and just society;
- Building a strong, stable and sustainable economy;
- Promoting good governance; and,
- Using sound science responsibly.

- 2.4 The Coalition Government has refreshed its vision and commitments to sustainable development in the document 'Mainstreaming Sustainable Development' (Defra, February 2011):

'Sustainable Development ... [means] making the necessary decisions now to realise our vision of stimulating economic growth and tackling the deficit, maximising wellbeing and protecting our environment, without negatively impacting on the ability of future generations to do the same ... Our long term economic growth relies on protecting and enhancing the environmental resources that underpin it, and paying due regard to social needs.'

- 2.5 The National Planning Policy Framework (NPPF) articulates the Government's Presumption in Favour of Sustainable Development and confirms it as the overriding principle for Planning.

Strategic Environmental Assessment and Sustainability Appraisal

- 2.6 Section 39 of the Planning and Compulsory Purchase Act 2004, requires Local Development Documents to be prepared with a view to contributing to the achievement of sustainable development. The requirement for a SEA is originally set out in the European Directive 2001/42/EC, which was adopted into UK law as the "Environmental Assessment of Plans and Programmes Regulations 2004". A SEA ensures that the environmental effects of certain plans and programmes, including land-use plans are taken into account.

- 2.7 The aim of the SA is to ensure that the Local Plan is as sustainable as possible. The process involves examining the likely effects of the plan and considering how they contribute to environmental, social and economic wellbeing. Where problems are identified mitigation measures can be proposed and put in place. These processes can therefore improve the overall sustainability of the plan being prepared.

2.8 As the SA and SEA processes are so similar, they have been undertaken together and for ease of reference, this document will refer to both processes as a SA. However, Government guidance suggests that the SA should identify where the requirements of SEA have been met. Table 2.1 sets out where the requirements of the SEA Directive have been met in this report. The remaining requirements will be covered in later stages of the process and will be included within the final SA submitted alongside the Local Plan.

Table 2.1 SA/SEA Report and conformity with SEA Directives

SEA Directive Requirements	Location within Report
<p>Annex 1 a Outline of report contents Main objectives of the plan & relationship with other plans and programmes.</p>	<p>Section 1 Section 3, and Section 4</p>
<p>Annex 1 b Current state of the environment & likely evolution there of without implementation of the plan.</p>	<p>Section 4 and Section 5</p>
<p>Annex 1 c Environmental characteristics of areas likely to be significantly affected.</p>	<p>Section 4</p>
<p>Annex 1 d Existing environmental problems which are relevant to the plan, including, in particular, those relating to any areas of a particular environmental importance.</p>	<p>Section 4</p>
<p>Annex 1 e Environmental protection objectives, established at international, community or national level and the way those objectives and any environmental considerations have been taken into account during its preparation.</p>	<p>Section 4</p>

Habitats Regulations Assessments (HRA)

2.9 A separate European Directive that relates to the Conservation of Natural Habitats and of Wild Fauna and Flora – the ‘European Habitats Directive’ (92/43/EEC) – requires an Appropriate Assessment (known as Habitats Regulations Assessment (HRA) in the UK) to be undertaken. HRA assesses the impact of land-use plans against the conservation objectives of European Sites within certain distances of the Borough (15 km has been used in the case of Crawley). The HRA ascertains whether the plan’s proposals would adversely affect the integrity of a site on its own, or in combination with the plans of neighbouring authorities.

- 2.10 In tandem with this Draft Sustainability Report, the Council has prepared a HRA Report. The findings of HRA Screening suggest that there is no significant likelihood of adverse impacts on protected sites from the implementation of the plan. Crawley Borough Council therefore does not intend to carry out Appropriate Assessment of the impacts of the Local Plan Options or Preferred Option on internationally designated sites. Further information is available in the HRA report that is available alongside this consultation.

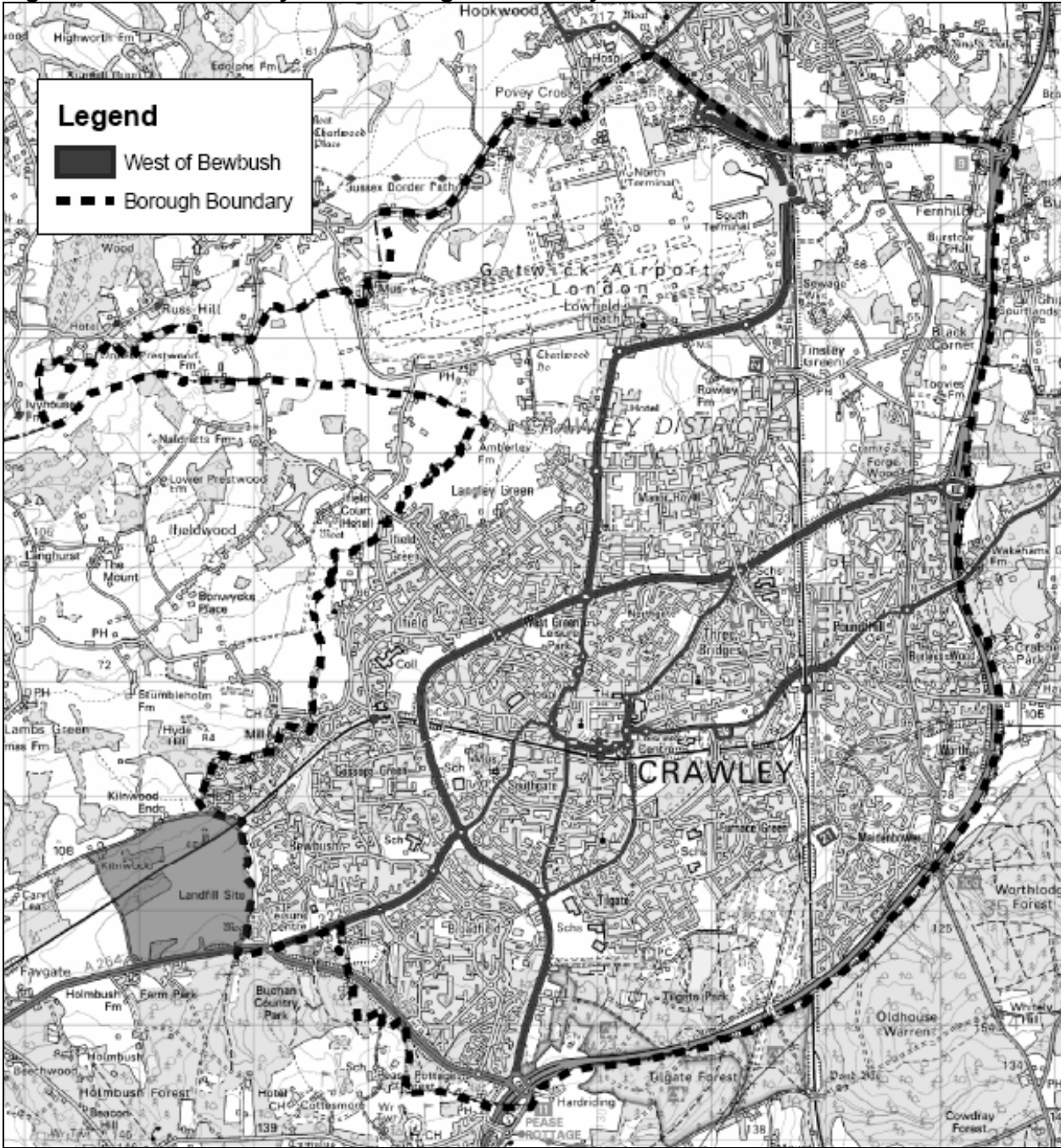
Methodology

- 2.11 As the first stage of the SA/SEA scoping of the Local Plan, the Council collected contemporary information on social, environmental and economic issues in the Borough. This is known as the 'baseline' data. This information was collected from monitoring carried out in the past, and other sources, and enabled the key issues facing the Borough today to be identified.
- 2.12 The Council then identified and analysed all plans, programmes and policies that could impact upon the Local Plan. These plans, programmes and policies include documents from international to local levels. The documents also provided further information about the Borough, which were included in the baseline data. From this information, it was possible to identify Sustainability Objectives that the emerging policy options in the Local Plan will be assessed against.
- 2.13 The Council received feedback on the Scoping Report from consultation carried out in January-March 2012 that accompanied Issues and Options consultation on the Local Plan. The consultation responses proposed minor modifications to indicators; additional plans and policies that should be considered; and proposals for policy options that should be included in the Appraisal. A summary of these proposed changes and the officer response and any changes made are summarised at Appendix B.
- 2.14 The Sustainability Objectives have been compared with each other and against the overall objectives of the Local Plan during the development of the preferred strategy. This process will enable any conflicts between the objectives to be identified. By identifying these conflicts, possible ways of reducing or resolving conflicts between Local Plan policies and sustainable development will be identified.
- 2.15 The SA is being prepared by Crawley's Forward Planning Department who are also responsible for the development of the Local Plan. Each Local Plan policy has been considered individually against the SA Objectives and the options available for the policy have been assessed.

Plan Area

- 2.16 Broadly speaking, the focus of the Local Plan will be upon Crawley Borough. However the West of Bewbush Joint Area Action Plan adopted in July 2009 extends beyond Crawley's Boundary into Horsham's administrative area and the combined impacts of development at this site will be considered with the Local Plan. Figure 2.1 shows the Borough Boundary, and area covered by the West of Bewbush JAAP, that will be considered by the SA.
- 2.17 Further growth into neighbouring authorities cannot be ruled out at this stage if further growth is required. Therefore, this draft SA report could be applied to areas beyond the boundary of Crawley during the life of the plan. The extent of the Plan area will be kept under review and updated as appropriate in future consultations.

Figure 2.1: SA Boundary - The Borough of Crawley



3.0 OVERVIEW OF THE LOCAL PLAN

Introduction

- 3.1 Crawley Borough Council is reviewing its Core Strategy. In light of the changes to planning emerging with the Localism Act and the adoption of the National Planning Policy Framework, Crawley's new Local Plan will set out policies to guide both strategic development and development management over the period 2014-2029. These policies will replace both the adopted Core Strategy (2008) and saved Local Plan policies.
- 3.2 A key aim of the Local Plan will be to ensure that the Borough continues to develop sustainably, and implement the presumption in favour of sustainable development in a locally appropriate manner.

The Local Plan and National Planning Policy Framework (NPPF)

- 3.3 Crawley currently has a Local Plan that comprises the adopted Core Strategy (2008); the policies that have been retained from the Local Plan (2000); the West of Bewbush JAPP, and a number of Supplementary Planning Documents (SPD) that cover subjects such as town centre redevelopment and Gatwick Airport.
- 3.4 The Local Plan is informed by a wide range of requirements, recommendations and guidance from documents produced at an international level all the way down to a local level. Such documents include National Planning Policy Framework (NPPF) and the Crawley Sustainable Community Strategy.
- 3.5 Crawley's new Local Plan (Crawley 2029) will respond to changed economic circumstances affecting growth and employment. It will plan for changes to housing supply and demand influenced by the economic future of Crawley, and the permission granted to development of a new neighbourhood in the North East Sector of the town.

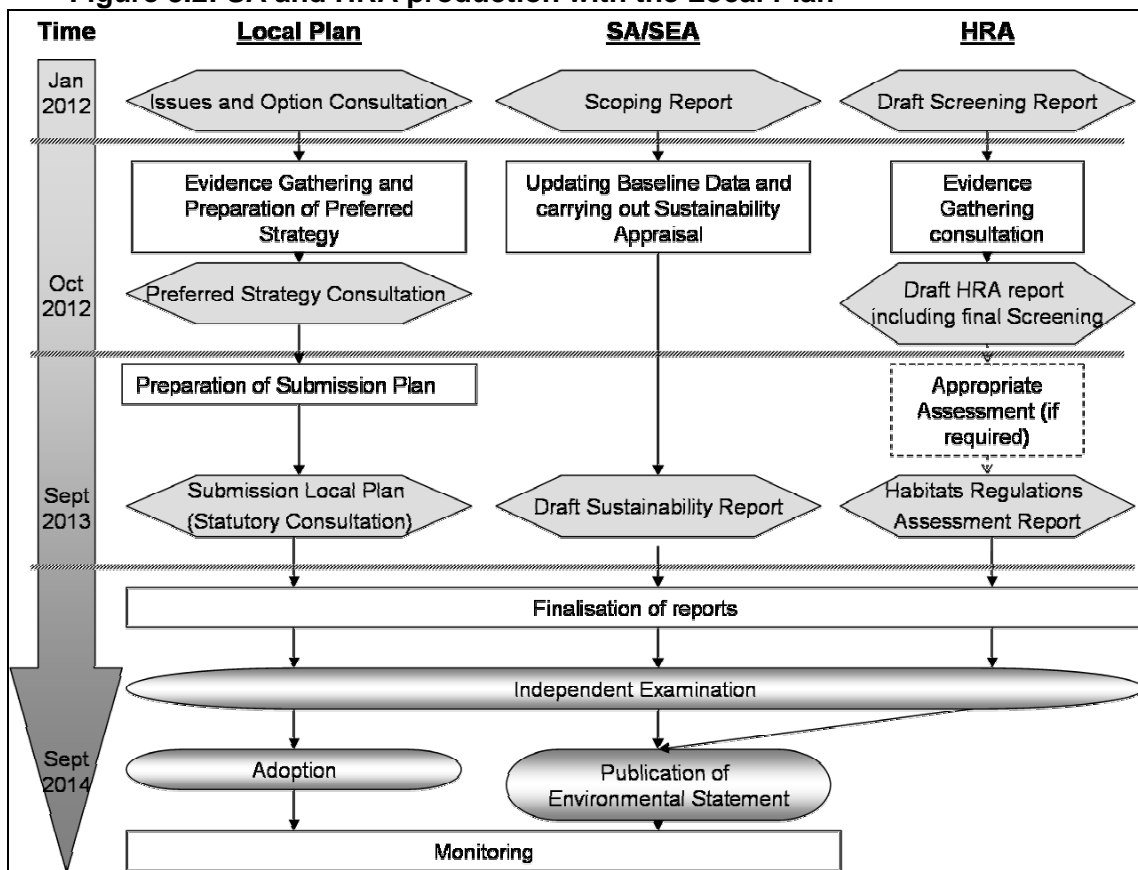
Crawley's Local Plan

- 3.6 This Draft Sustainability Report is available for consultation in tandem with preferred strategy consultation for the Local Plan. The Local Plan will address development proposals including the long-term housing and employment land supply position for the period up to 2029. It will include policies to guide the location and type of new development, and to protect valued elements of natural and built environment; and will set out plans for the implementation of infrastructure supporting it. Although the SA is being prepared in tandem with the Local Plan, its focus is not solely upon the Plan, but will be used to appraise all subsequent documents including SPDs.
- 3.8 The review of the adopted Core Strategy affords the Council the opportunity to prepare a new SA framework, building upon the lessons learnt during the preparation of the first Core Strategy. A simplified diagram of the key documentation proposed to accompany the adopted Local Plan is shown at Figure 3.1

Table 3.1: Local Plan Development Timetable

Stage	Date
Issues and Options consultation	19 Jan – 1 Mar 2012
Preferred Strategy consultation	22 Oct – 3 Dec 2012
Site Allocation consultation	Spring 2013
Submission consultation	November/December 2013
Submission	January 2014
Examination in Public	May/June 2014
Adoption	December 2014/January 2015

Figure 3.2: SA and HRA production with the Local Plan



3.11 The major objectives for the Local Plan will be determined using the evidence base and consultation feedback. The Issues consultation and preparation of Options for the Local Plan has identified the following objectives for the planning and delivery of development in Crawley. These objectives will be considered during the Sustainability Appraisal.

Objective 1: To make Crawley an attractive town where people will want to live, work and spend their leisure time supported by well designed neighbourhoods, strengthened employment areas and a vibrant and attractive town centre and neighbourhood centres.

Objective 2: To reinforce Crawley's role as a competitive regional shopping destination by delivering a significant expansion in the range and quality of retail and other town centre priorities through encouraging step-change retail offer in the town centre core.

Objective 3: To reduce crime and fear of crime in Crawley through protecting and improving community safety in the borough.

Objective 4: To protect and enhance the valued built environment and character within the borough through high quality new design and the protection of culturally valuable areas and buildings.

Objective 5: To meet as much of the agreed housing need as possible within the borough boundary, in light of constraints; by supporting the delivery of 240 no. homes each year from 2014 to 2029.

Objective 6: To provide a good choice of well designed housing in terms of tenure, type, size and location.

Objective 7: To ensure that x% of new housing development is affordable.

Objective 8: To improve the business offer and to maintain, support and promote a diverse employment base that can serve the local and sub-regional and regional economy.

Objective 9: To support Gatwick Airport to maximise its potential as a 1-runway, 2-terminal airport; increasing passenger throughput up to 45 million passengers per annum subject to satisfactory legal agreements.

Objective 10: To ensure the protection and enhancement of valued open spaces.

Objective 11: To facilitate and support the provision of new leisure facilities.

Objective 12: To facilitate and support the provision of new cultural facilities.

Objective 13: To ensure the provision of sufficient infrastructure to meet the requirements of the borough.

Objective 14: To support the provision of quality education – including supporting and facilitating, where appropriate, improving skills levels.

Objective 15: To promote healthy, active, cohesive and socially sustainable communities.

Objective 16: To work towards ensuring Crawley is a Carbon Neutral town by 2050.

Objective 17: To ensure new developments will be of high quality and sustainable design and construction in line with national standards; with new buildings being built to a high energy efficiency standard to ensure warmth continues to be affordable to all residents and meet the challenges to work towards becoming Carbon Neutral.

Objective 18: To ensure all businesses have access to good quality technological connections.

Objective 19: To reduce car journeys and promote sustainable and alternative methods of transport, whilst ensuring sufficient transport infrastructure is delivered to meet the requirements of the Borough.

Objective 20: To conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough.

Objective 21: To adapt to the effects of climate change through the reduction of the risk of flooding and the amount of waste water; sustainable design of developments and effective management of water resources.

4.0 Crawley and the Sustainability Appraisal Objectives

Introduction to Crawley

- 4.1 Crawley Borough covers 4,497 hectares of land in the north east of West Sussex County and is predominately urban in character, although the town is surrounded by countryside lying mostly in neighbouring authorities. Horsham District abuts the town to the west, Mid Sussex District to the south and east, whilst the County of Surrey is adjacent to the north of the town.
- 4.2 Crawley has its origins in the Middle Ages, or even earlier, although the majority of the town's urban form is derived from growth occurring post 1947 when it was designated as one of the 8 post War 'New Towns'. 'New Towns' aimed to stem the increasing congestion and outward sprawl of London whilst providing a better quality of life for Londoners living in the inner and overcrowded areas of the city, by giving new residents access to employment, good quality housing and a green environment.
- 4.3 Fundamental to the urban form of the town is the principle of a town centre offering leisure and shopping opportunities, surrounded by a series of residential neighbourhoods, each with its own facilities and laid out preserving the best natural features of the countryside upon which the neighbourhoods were built. There are 13 neighbourhoods in the town, and planning permission has been granted for two more: at land West of Bewbush (Kilnwood Vale), and the North East Sector.
- 4.4 As a result of the planned approach to development, the town has extensive tree cover and semi-natural open spaces within the urban area. These features provide Crawley with a high quality natural environment and a sense of local distinctiveness, as well as a rich ecological infrastructure network throughout the town.

Issues and Options Consultation

- 4.5 The council began the first stage of the Core Strategy Review (*'Issues and Options'*) for consultation in May 2009. The consultation invited feedback on 13 topic papers that summarised key issues facing Crawley over the coming years. This included consideration of an early Sustainability Appraisal Scoping Report and associated Topic Paper.
- 4.6 Following the Issues and Options stage it was anticipated that *Preferred Strategy* consultation would be undertaken in summer 2010. However, a number of uncertainties resulted in the council needing to revisit its timetable. The updated programme has been designed to take into account the Secretary of State's issuing of a North East Sector decision (and subsequent challenge period), and allows for the objectives and requirements of the Localism Act to be reflected in the new **Local Plan** document which will eventually replace the Core Strategy.
- 4.7 The new Local Plan Programme, known as Crawley 2029, began with the revised Issues and Options consultation. From January to March 2012 we asked residents, community groups, businesses and other stakeholders to let us know about the key issues facing the town now, and what they would like to see here in the future. This included issuing an updated Sustainability Appraisal Scoping Report and an updated consultation Topic Paper reflecting the changes experienced since 2009.
- 4.8 The responses to the whole of the consultation undertaken in early 2012 have been collated into a document, setting out a summary to the consultation and including an appendix with the comments received by consultees and stakeholders as part of this process. A summary of those received relating to the Sustainability Appraisal Scoping Report and Topic Paper can be found in Appendix B to this draft report. These

comments have fed into the preparation of this draft Sustainability Appraisal for the preferred strategy Local Plan.

Sustainability Appraisal Topic Areas

- 4.9 The social, economic and environmental impacts that may arise from the implementation of the Borough's Local Plan will be appraised on a topic basis. Baseline data has been collected to establish the existing situation within the Borough, and the most important trends and issues. These have been condensed into 10 overarching Sustainability Objectives that should be considered when proposing any development options or policies for the Local Plan. Ideal sustainable development in Crawley would result in positive effects on all the Objectives identified – although in reality it is likely compromises will have to be found and mitigation implemented to find a balance between social, economic and environmental needs.
- 4.10 The baseline data draws upon the evidence base being gathered for the development of the Local Plan; and existing information and statistics available from monitoring data. At this relatively early stage in the preparation of the Local Plan, elements of the baseline data are still being collected, specifically in relation to data at the ward and neighbourhood level. New information will be added as it is identified to allow the spatial objectives of the Local Plan to be regularly assessed and prioritised.
- 4.11 Statistics and trends are quoted from information available at the time of writing. Much of this information will cease to be available as the Council no longer monitors non-statutory indicators from the now abolished National Indicator Set. Crawley is reviewing its monitoring arrangements for both the Local Plan and the Sustainability Appraisal and includes an emerging proposed monitoring framework with the preferred strategy Local Plan and accompanying Sustainability Report. This will continue to be developed to support the Submission Local Plan.
- 4.12 The SEA Regulations and Government Guidance require that the policies, plans, programmes and objectives that influence the production of the Local Plan should be identified in the SA. The lists presented under each of the topic areas A to G is unlikely to be completely comprehensive because a number of the higher-level plans, policies and programmes are interpreted into lower level local documents. Where conflicts between plans, policies and programmes exist, the Council will aim to identify them during Sustainability Appraisal and discuss the approach to resolving the conflict.
- 4.13 The SA topic areas are listed in Table 4.1, with the SEA Directives clearly highlighted where relevant:

Table 4.1: Consideration of issues in the SEA Directive by Topic Area

Topic Area		Scope of Topic	Links to SEA Directive
A	Climate Change, Sustainability, Sustainable Design and Construction	energy efficiency, flooding, air quality, noise, water, waste, climate change and water supply	<i>Material Assets, Water; Air; Climatic Factors</i>
B	Heritage, Character, Design and Architecture	urban design, urban environment, cultural heritage.	<i>Cultural Heritage</i>
C	Housing	housing need, aspirations, strategic development locations	

Topic Area		Scope of Topic	Links to SEA Directive
D	Economy	maximising benefits of Gatwick Diamond, vibrant town centres, strong economic growth	
E	Natural Environment	countryside, landscape, biodiversity, greenways and green open space	<i>Biodiversity, Landscape, Air Quality, Fauna, Flora and Soil</i>
F	Transport and Infrastructure	roads, rail, public transport, Gatwick, infrastructure	
G	Population, Community Facilities and Open Spaces, Crime and Health of the Community	demographics educational establishments, community halls, open space, sport and recreation provision	<i>Population, Human Health</i>

Current Sustainability Issues

4.14 From the examination of the baseline data and the plans, programmes and policies that will influence the Local Plan, it was possible to identify the current sustainability issues faced by the borough. These issues are set out in Table 4.2.

Table 4.2: Sustainability Issues

Crawley's Sustainability Issues:	
Pollution	Crawley's role as an economic hub and transport interchange means the town's contribution to air pollution and climate change is likely to rise.
Waste	Crawley has no strategy for managing commercial and industrial waste.
Flooding	The concentration of new development in Crawley and the surrounding area may increase the risk of flooding.
Water Supply	The potential for development to be concentrated in the Crawley area may lead to water supply issues.
Sewerage	The potential for development to be concentrated in Crawley may lead to sewerage capacity problems.
Air Quality	In the context of an expanding town and international airport, maintenance of air quality may become increasingly difficult.
Noise	Noise has the potential to affect people living, working in and visiting Crawley, particularly aircraft noise in the north of the Borough. The degree to which this will affect people is affected by uncertainty surrounding the future expansion of Gatwick Airport.
Attractiveness	The need to create a place that people want to live and invest in to enhance quality of life and encourage economic growth.
Housing Delivery	The economic downturn is seriously affecting the delivery of new housing.
Housing Stock	The housing stock does not match the need and aspirations of the Borough over the next 20 years.
Affordable Housing	Affordable housing provision does not match the level of need.

Land Supply	Land supply in the Borough is limited.
Building Stock	There is a mismatch between the existing building stock and the current needs of the changing economy, both within the dedicated business areas and within the town centre.
Skills Gap	Local skills do not match the requirements of local businesses, resulting in significant in-commuting to the Borough from surrounding areas.
Changing Economy	The economic structure of the town is moving from one dominated by large scale airport relating business to one where professional services are becoming increasingly strong.
Competitiveness	The retail sector of the town's economy has been declining in recent years and there is capacity for a step change improvement in the quality the town centre.
Green Infrastructure	The lack of development land is increasing the threat to nature areas, open spaces and green infrastructure within the urban environment.
Biodiversity	Development in the Borough will impact on biodiversity, fauna, flora and soil.
Traffic Demand	The growth of the town will increase pressures on transport infrastructure that is already approaching capacity.
Infrastructure provision	The rate of development, particularly residential, requires careful management to ensure that it does not outstrip the Borough's infrastructure.
Community Facilities	The changing population demographics area creating a mismatch between the need for housing and community facilities and current provision.
Ethnic Diversity	The ethnic structure of the population of Crawley is notably diverse in comparison to the national average resulting in specific development demands.
Young Population	Crawley has a high proportion of young children compared with other West Sussex local authorities but early years provision in the Borough is poor. Those leaving education are not able to participate fully in the local economy.
Crime	There is a need to reduce crime and the perception of crime.
Health	Physical activity in the Borough is below average.

The Sustainability Objectives and Indicators

4.15 Taking the sustainability issues as a starting point, it was possible to identify the proposed Sustainability Objectives for Crawley. The Objectives will be used to assess how the various policy options being explored for the Local Plan could contribute to the sustainable development of the Borough – by comparing each policy or proposal's effects on each objective. The proposed Objectives, and examples of indicators that could be used to monitor the effects of the Plan against the Objectives, are shown Table 4.3. (These indicators do not form the final proposed monitoring framework for the Sustainability Appraisal of Crawley's Local Plan, and are included as examples only, to show the sort of information the Council has gathered in the past).

Table 4.3: Proposed Sustainability Objectives and possible monitoring indicators

Objectives	Examples of Indicators
1. To minimise climate change and local pollution through the promotion of low carbon and energy efficient transport and buildings; promotion of low/zero carbon and decentralised energy; low pollution technology and the reduction of waste.	CO ₂ reduction from Local Authority operations; Per capita CO ₂ emissions in the local authority area; Residual household waste kg per household; Household waste recycled and composted.
2. To adapt to the effects of climate change through the reduction of the risk of flooding and the amount of waste water; sustainable design of developments, and effective management of water resources.	Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds.
3. To protect and enhance the valued built environment and character within the Borough through high quality new design and the protection of culturally valuable areas and buildings.	The number and proportion of total new build completions on housing sites reaching very good, average, and poor ratings against the building for life criteria; Number of listed buildings on the Buildings at Risk Register; Percentage of conservation areas with up-to-date Appraisals (i.e. last 5 years).
4. To ensure that everyone has the opportunity to live in a decent and affordable home.	Net additional dwellings – in previous years; Net additional pitches (Gypsy and Traveller); Supply of ready to develop housing sites (5-year housing land supply); New and converted dwellings – on previously developed land (PDL).
5. To maintain, support and promote a diverse employment base that can serve the local and sub-regional and regional economy.	Skills gap in the current workforce reported by employers; Working age population qualified to at least Level 4 or higher; Skills gap in the current workforce reported by employers; Working age population qualified to at least Level 4 or higher.
6. To conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the Borough.	Change in areas of biodiversity importance; Improved Local Biodiversity – proportion of Local Sites where positive conservation management has been or is being implemented - District (CBC); Amount and type of development within areas designated for their nature importance; Amount of trees with Tree Preservation Orders lost per annum
7. To reduce car journeys and promote sustainable and alternative methods of transport, whilst ensuring sufficient transport infrastructure is delivered to meet the requirements of the Borough.	Congestion – Average journey time per mile during the morning peak; Access to services and facilities by public transport, walking and cycling; Number of passengers using Gatwick Airport per annum and percentage arriving by public transport; People killed or seriously injured in road traffic accident.

Objectives	Examples of Indicators
8. To ensure the provision of sufficient infrastructure to meet the requirements of the Borough.	Rate of residential and commercial development to be in accordance with SEPlan annualised requirements and local commercial requirements
9. To promote healthy, active, cohesive and socially sustainable communities.	Percentage of people who feel that they belong to their neighbourhood; Overall satisfaction with local area; Percentage of people aged 16 – 74 with no qualifications.
10. To ensure everyone has the opportunity to participate in sport and to encourage active lifestyles.	Self reported measure of people's overall health and wellbeing; All-age all cause mortality rate; Healthy life expectancy at age 65.

4.16 The Local Plan Objectives have been prepared and assessed alongside those identified for the Sustainability appraisal. Table 4.4 shows the compatibility between the Local Plan Objectives and the Sustainability Appraisal Objectives.

Table 4.4: Local Plan and Sustainability Objectives

Local Plan Objective	Sustainability Objective
Objective 1: To make Crawley an attractive town where people will want to live, work and spend their leisure time supported by well designed neighbourhoods, strengthened employment areas and a vibrant and attractive town centre and neighbourhood centres.	
Objective 2: To reinforce Crawley's role as a competitive regional shopping destination by delivering a significant expansion in the range and quality of retail and other town centre priorities through encouraging step-change retail offer in the town centre core.	5. To maintain, support and promote a diverse employment base that can serve the local and sub-regional and regional economy.
Objective 3: To reduce crime and fear of crime in Crawley through protecting and improving community safety in the borough.	3. To protect and enhance the valued built environment and character within the Borough through high quality new design and the protection of culturally valuable areas and buildings.
Objective 4: To protect and enhance the valued built environment and character within the borough through high quality new design and the protection of culturally valuable areas and buildings.	3. To protect and enhance the valued built environment and character within the Borough through high quality new design and the protection of culturally valuable areas and buildings.
Objective 5: To meet as much of the agreed housing need as possible within the borough boundary, in light of constraints; by supporting the delivery of 240 no. homes each year from 2014 to 2029.	4. To ensure that everyone has the opportunity to live in a decent and affordable home.
Objective 6: To provide a good choice of well designed housing in terms of tenure, type, size and location.	4. To ensure that everyone has the opportunity to live in a decent and affordable home.

Local Plan Objective	Sustainability Objective
Objective 7: To ensure that x% of new housing development is affordable.	4. To ensure that everyone has the opportunity to live in a decent and affordable home.
Objective 8: To improve the business offer and to maintain, support and promote a diverse employment base that can serve the local and sub-regional and regional economy.	5. To maintain, support and promote a diverse employment base that can serve the local and sub-regional and regional economy.
Objective 9: To support Gatwick Airport to maximise its potential as a 1-runway, 2-terminal airport; increasing passenger throughput up to 45 million passengers per annum subject to satisfactory legal agreements.	5. To maintain, support and promote a diverse employment base that can serve the local and sub-regional and regional economy.
Objective 10: To ensure the protection and enhancement of valued open spaces.	8. To ensure the provision of sufficient infrastructure to meet the requirements of the Borough.
Objective 11: To facilitate and support the provision of new leisure facilities.	8. To ensure the provision of sufficient infrastructure to meet the requirements of the Borough.
Objective 12: To facilitate and support the provision of new cultural facilities.	8. To ensure the provision of sufficient infrastructure to meet the requirements of the Borough.
Objective 13: To ensure the provision of sufficient infrastructure to meet the requirements of the borough.	8. To ensure the provision of sufficient infrastructure to meet the requirements of the Borough.
Objective 14: To support the provision of quality education – including supporting and facilitating, where appropriate, improving skills levels.	8. To ensure the provision of sufficient infrastructure to meet the requirements of the Borough.
Objective 15: To promote healthy, active, cohesive and socially sustainable communities.	9. To promote healthy, active, cohesive and socially sustainable communities.
Objective 16: To work towards ensuring Crawley is a Carbon Neutral town by 2050.	1. To minimise climate change and local pollution through the promotion of low carbon and energy efficient transport and buildings; promotion of low/zero carbon and decentralised energy; low pollution technology and the reduction of waste.
Objective 17: To ensure new developments will be of high quality and sustainable design and construction in line with national standards; with new buildings being built to a high energy efficiency standard to ensure warmth continues to be affordable to all residents and meet the challenges to work towards becoming Carbon Neutral.	1. To minimise climate change and local pollution through the promotion of low carbon and energy efficient transport and buildings; promotion of low/zero carbon and decentralised energy; low pollution technology and the reduction of waste.
Objective 18: To ensure all businesses have access to good quality technological connections.	5. To maintain, support and promote a diverse employment base that can serve the local and sub-regional and regional economy.

Local Plan Objective	Sustainability Objective
<p>Objective 19: To reduce car journeys and promote sustainable and alternative methods of transport, whilst ensuring sufficient transport infrastructure is delivered to meet the requirements of the Borough.</p>	<p>7. To reduce car journeys and promote sustainable and alternative methods of transport, whilst ensuring sufficient transport infrastructure is delivered to meet the requirements of the Borough.</p>
<p>Objective 20: To conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough.</p>	<p>6. To conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the Borough.</p>
<p>Objective 21: To adapt to the effects of climate change through the reduction of the risk of flooding and the amount of waste water; sustainable design of developments and effective management of water resources.</p>	<p>2. To adapt to the effects of climate change through the reduction of the risk of flooding and the amount of waste water; sustainable design of developments, and effective management of water resources.</p>

5.0 Options and Preferred Strategy Policy Appraisal

5.1 Each emerging Local Plan policy and the associated options were assessed against the objectives of the Sustainability Appraisal as part of their preparation on an individual basis. The results of this analysis can be found in Appendix E to this draft report. The overview of this broad sustainability appraisal assessment of the preferred policies can be seen below in Table 5.1.

5.2 Each policy was assessed against the separate Sustainability Objectives, against a simplified criteria of:

- Significant positive impact on the sustainability objective (++)
- Positive impact (+)
- Possible positive or slight positive impact on the sustainability objective (+?)
- No impact on the sustainability objective (0)
- Neutral impact on the sustainability objective (/)
- Uncertain impact on the sustainability objective (?)
- Negative impact on the sustainability objective (-)
- Significant negative impact on the sustainability objective (--)

5.3 Detailed commentary is provided to explain the reasons behind the assessment in each case.

5.4 This analysis has shown that whilst in the majority of cases the chosen policy has a positive or no impact on the sustainability objectives, there remains a need to consider further mitigation is in place to minimise or neutralise the outstanding potential negative impacts. This work will continue as the Local Plan develops to Submission.

5.5 However, only one policy has identified a potential significant negative impact on a single sustainability objective (Policy GAT3: Gatwick Airport Related Parking on Sustainability Objective 7: To reduce car journeys and promote sustainable and alternative methods of transport, whilst ensuring sufficient transport infrastructure is delivered to meet the requirements of the Borough). The chosen option in this instance continued to be considered to have a lesser impact than the alternative, and allows for greater opportunities for mitigation measures in respect of this objective.

5.6 Two policies have been appraised but their preferred policy has not yet been determined, due to outstanding evidence and further consultation. These relate to the issues of Affordable Housing (Policy H4) and Gypsy and Traveller Needs (Policy H5).

Table 5.1: Preferred Strategy Local Plan Policies Sustainability Appraisal Overview

Local Plan Policy	SA Objective									
	1	2	3	4	5	6	7	8	9	10
CH1	++	+	++	++	+	+	++	++	++	++
CH2	+	+	++	?	?	++	?	+	+	+
CH3	++	+	++	+	+?	+	++	+	+	+
CH4	+	+	+	+?	+?	++	+	+?	+	+
CH5	+	+	+	++	++	+	+	+	+	/
CH6	+	+	++	++	0	+	0	0	+	+
CH7	0	0	++	+	+	0	?	?	+	0
CH8	+	0	++	-	++	+	0	0	+	0
CH9	0	+?	+	-	+?	+?	0	0	+	0
CH10	+	+?	++	-	0	+	0	0	0	0
CH11	+	+	++	/	/	+	-	-	/	/
CH12	+	?	+	+	/	+	+	?	+	+
EC1	+	+	0	0	+	0	+	0	+	0
EC2	+	+	++	+?	+	?	++	++	++	+?
EC3	?	?	+?	++	++	++	++	+	++	++
EC4	0	0	+?	+	++	0	++	++	++	+?
EC5	++	+	++	++	++	0	++	+	++	0
EC6	?	+?	+	0	+	+?	?	?	0	+
EC7	?	?	?	0	+	+?	?	?	0	?
EC8	+	?	+	0	++	?	++	+	++	++
EC9	+	+	+	?	+	0	-	-	-	0
EC10	+	0	+	0	++	0	-	0	+	0
H1	0	+	+	-	+	+	0	+	+	0
H2	0	+	+	0	0	+	+	+	+	0
H3	0	0	0	-	0	0	0	0	+	0
H4*										
H5*										
H6	0	0	0	+	0	0	0	0	+	0
ENV1	++	++	+?	0	0	++	+?	+?	++	+
ENV2	++	+	?	0	+?	?	0	++	+	0
ENV3	++	+	?	0	+?	0	0	++	+?	0
ENV4	0	++	++	?	?	++	0	+	+	0
ENV5	++	++	++	?	?	++	0	0	+	0
ENV6	++	++	/	?	0	++	0	++	+	0
ENV7	++	++	++	++	0	+	0	+	+	0
ENV8	++	++	++	+	0	+	0	0	++	0
ENV9	0	0	0	0	0	0	0	+	0	0
ENV10	++	++	0	0	0	++	0	0	++	0
ENV11	+	+	+	0	0	++	0	++	+	++
ENV12	+	+	+	/	/	++	0	+	+	+
ENV13	+	+	+	0	0	+	0	++	+	+
IN1	+?	/	/	/	/	0	+	++	++	+
IN2	+	+	0	0	+	0	+	++	0	0
IN3	+	/	+?	?	?	0	++	+	+?	+
IN4	+	+?	-?	0	-?	-	+	+	0	0
IN5	++	0	0	+	0	0	++	+	+	+
IN6	+	+?	+	0	+?	0	++	+	+?	0
IN7	?	-	?	0	0	+	-	0	0	0
GAT1	-	-	0	0	++	/	-	+	0	0
GAT2	?	?	?	0	?	/	?	?	-	0
GAT3	-	-	0	0	/	0	--	/	0	0
GAT4	0	0	0	0	+	0	+	0	0	0

Key:
 ++ Significant positive impact on the sustainability objective
 + Positive impact
 +? Possible positive or slight positive impact on the sustainability objective
 0 No impact on the sustainability objective
 / Neutral impact on the sustainability
 ? Uncertain impact on the sustainability objective
 - Negative impact on the sustainability objective
 -- Significant negative impact on the sustainability objective

*preferred option not yet identified.

6.0 NEXT STEPS

- 6.1 This document will be used to inform the preparation of a Sustainability Report including Appraisal of the development options and policies proposed for the new Local Plan. The Draft Report will be published for consultation alongside the Proposed Submission Plan.
- 6.2 The baseline data of the Sustainability Report will need to be revised to incorporate any additional information that becomes available during the preparation of the Local Plan. Collection of data at the ward or neighbourhood level will assist in the appropriate application of the SA objectives when dealing with site-specific policies, and further evidence based studies (for example for transport impacts of development proposals) will be prepared.
- 6.3 A review of the data that will be collected and monitored by the council and other bodies to measure the success of the LDF against the SA objectives will be part of this work. The Proposed Submission Local Plan and Draft Sustainability Report will include proposed a proposed monitoring framework for the future.

Proposed SA Report Structure

- 6.4 Once the Objectives have been finalised and monitoring framework prepared, they will be used as the framework for all future SAs and as the basis for monitoring. The proposed structure of the SA Report is set out below, although the final documents may take a slightly different format dependent upon the outcome of consultation.
- Non-technical summary
 - Chapter 1 Introduction – Setting out the plan objectives, the relationship with higher level guidance, and the methodology applied to the appraisal;
 - Chapter 2 Sustainability Appraisal Topic Areas;
 - Chapter 3 Plan Policies – Establishing the preferred options;
 - Chapter 4 Sustainability Appraisal of Options and Preferred Option;
 - Chapter 5 Implementation – Setting out the proposed methodology for implementing the findings of the SA, any mitigation required and the proposed monitoring framework to be used to assess the sustainability of the policies and plans as they are implemented.

Consultation Arrangements

- 6.5 This interim draft SA/SEA report has been produced in tandem with the development of preferred strategy consultation as part of the preparation of a new Local Plan for Crawley. Details of how to make comments are outlined in Section 1. Work will continue on the draft SA/SEA report in parallel with the preparation of the Local Plan to Submission and Examination. Further consultation will be carried out alongside the anticipated consultation stages of Site Allocations and Submission drafts as set out in the timetable in Table 3.1 of this report.

APPENDIX A: GLOSSARY

Affordable Housing

Housing delivered through a mixture of public and private subsidies to allow a lower market price or rent price than is normal on the open market.

Annual Monitoring Report (AMR)

A document produced annually by the Council to review the progress made against milestones set out within the Local Development Scheme and the performance of planning policies against national and local indicators. The monitoring period runs from the 1st April to the 31st March each year.

Area of Outstanding Natural Beauty (AONB)

A national landscape designation which aims to conserve and enhance the natural beauty of the landscape.

Built-up Area Boundaries

The boundary where land ceases to be designated as urban and instead becomes countryside. Development is predominately favoured within the urban area / built-up area boundary.

Community Infrastructure Levy

CIL regulations published in April 2010 allow Local Authorities to develop a schedule to charge all new development for contributions to infrastructure requirements created by the development. Authorities must adopt a CIL charging schedule by April 2014 to benefit from the proposals. Crawley is intending to develop a schedule during the preparation of the Local Plan, and use the Levy in combination with contributions received under Section 106 of the Town and Country Planning Act 1995 for selected developments from 2014.

Core Strategy (adopted November 2008)

The Core Strategy of the LDF contains an overall vision for the future development on the town up to 2016. It sets out the overall approach which the Council, working with its partners in the local and regional community, will use to guide and control the future use and development of land and to improve and protect the town's environment and facilities. It underpins all the other documents to be prepared as part of the LDF. A review of the Core Strategy was started in 2008, and an Issues and Options consultation was carried out in 2009. The review process was re-started following the election of the Coalition Government and publication of proposals for Localism and the National Planning Policy Framework.

Development Plan Document (DPD)

Development Plan Documents are the key documents within Crawley's LDF, setting out the planning policies that planning applications will be determined against and allocating land for specific land uses.

Ecohome Standards

Standards laid down for the design and building of businesses and homes to be more sustainable, including wildlife friendly design, use of recycled materials and energy, heating and water conservation methods.

Greenfield Land

Land that is currently undeveloped (i.e. land that has not been occupied by a permanent structure).

Local Development Framework (LDF)

The portfolio of documents designed to deliver the spatial planning strategy for an area. An LDF will typically comprise of Development Plan Documents, Supplementary Planning Documents, the Statement of Community Involvement, a Local Development Scheme and the latest Annual Monitoring Report. This is now no longer referred to as the LDF and instead constitutes the Local Plan.

Local Development Scheme (LDS)

The Local Development Scheme (LDS) is a public statement identifying which local development documents will be produced within Crawley's LDF, in which order and when. Each document is assigned a set of key milestones that vary according to the type of document being produced.

Local Plan

The Local Plan will replace the adopted Core Strategy (2008) with a single document incorporating strategic planning, and development management policies. It is currently expected that the Local Plan will be adopted in 2014.

Local Plan Policies (2000)

Refers to policies originally included in the adopted Local Plan (2000), which have been saved by the Council until replaced by policies in new Development Plan Documents. A schedule of the phasing of the replacement of Local Plan Policies is set out within the Local Development Scheme.

Local Strategic Partnership (LSP)

Local Strategic Partnerships (LSPs) are non-statutory, multi-agency partnerships, which match local authority boundaries. LSPs bring together at a local level the different parts of the public, private, community and voluntary sectors; allowing different initiatives and services to support one another so that they can work together more effectively.

National Planning Policy Framework

National planning policy is provided in a single National Planning Policy Framework (NPPF) which was adopted in 2012. It is supported by a Technical Guidance to the National Planning Policy Framework document which provides additional information with regards to Flood Risk and Minerals policy. A separate document Planning Policy for Traveller Sites was also published at the same time.

Planning and Compulsory Purchase Act 2004 (updated in 2008)

Parliamentary Act setting out the broad requirements on Local Authorities for the development of planning policy.

Planning Policy Statements (PPSs) / Planning Policy Guidance Notes (PPGs)

Planning guidance published by central government on a thematic basis. These have been replaced in their entirety by the National Planning Policy Framework.

Previously Developed Land (PDL)

Refers to land that was occupied by a permanent structure, including land within the curtilage of the development, with the exception of agricultural and forestry buildings.

Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA)

The purpose of sustainability appraisal is to appraise the social, environmental and economic effects of the strategies and policies in a Local Development Document from the outset of the preparation process. The results of the SA/SEA process are used as a decision making tool. The acronym refers to the requirements under the Planning and Compulsory Purchase Act

2004 to carryout both a Sustainability Appraisal and a Strategic Environmental Assessment, which due to their similarities can be combined.

South East Plan

The South East Plan superseded the adopted Regional Planning Guidance 9 (RPG9) in 2009. The Coalition government intend to abolish regional plans on the adoption of the Localism Bill in 2012. At the time of writing the SEP is still current, and the relevant housing and jobs targets still apply to Crawley.

Statement of Community Involvement (SCI)

This is a document that explains how the Council intends to involve the local community and key stakeholders in the preparation of Local Development Documents (and in the planning application process) and the steps that authorities will take to facilitate this involvement.

Sustainable Design

Design which reduces the impact of the building upon the environment through a number of measures ranging from being located near to public transport, to being able to develop on site power and water sources.

**APPENDIX B : SUMMARY OF SCOPING REPORT CONSULTATION
RESPONSES**

Comment received	Officer Response
Evidence base also includes: Natural Environment and Rural Communities Act 2006 spec S40 &41; Ancient Woodland Inventory; Sussex Biodiversity Record Centre	These documents will be added to the Plans Policies and Programmes information in the Sustainability Report
currently agree with the conclusions of the draft HRA screening	Noted
delete the list of species within E4 as these do not all fulfil the requirements of the previous sentence	Noted. The sentence will be deleted or the information updated to be accurate, as far as information is available
Table 4.3, SO6: the proposed indicators are biased toward no net loss of designates sites. Consider recording 'area of Crawley that has been ecologically enhanced'	Noted. A new list of proposed indicators will be included in the Draft Sustainability Report and prepared in parallel with proposed monitoring framework for the Local Plan in the Preferred Option consultation to ensure compatibility and a comprehensive range or appropriate indicators. The indicators will avoid bias and this suggestion will be taken into account during their preparation
Under Key Issues 'A': Page 26 - Support the approach that 'the council includes water efficiency policies in its Core Strategy Review, and approach that has been endorsed by the water companies'	Noted
Under Key Issues 'A': Page 28 - Does not discuss increased water efficiency measures for new developments which should attract more stringent water efficiency levels, i.e. 105l/p/d equating to CfSH's level 3/5. Support the recommendations put forward for water efficiency by the Water cycle Study and hope these have been applied to the core strategy policies across the council's areas and not just Gatwick growth area	The CfSH requirements will be added to the 'Trend' information in the Sustainability Report, along with other information in the report respecting Southern Water's recent installation of meters across Crawley. The Local Plan will consider appropriate water policies that will apply across the Borough as well as in specific locations/in relation to specific developments. We will work with the EA and other stakeholders to agree appropriate policies
The evidence base should also include Water Framework Directive and the Mole CMAS	These documents will be added to the Plans Policies and Programmes information in the Sustainability Report
there should be a mention of the need to protect groundwater during development. Any site proposed for development should be screened using the Environment Agency's Groundwater Protection: Policy and Practice (GP3), for acceptability of what types of development will be acceptable in different locations	Noted. This will be included in the Issues in the Sustainability Report and considered for policy inclusion during preparation of the draft Local Plan

Comment received	Officer Response
SuDS that allow for infiltration to ground may not be acceptable at all sites. (w.r.t. EA document GP3 for surface water drainage provided ground conditions are suitable - i.e. not impacted by contamination)	Noted. Potential for contamination to groundwater and other issues will be taken into consideration when formulating policy options for SuDS and surface water drainage; and policy options Appraised during the SA to consider any appropriate mitigation measures
GP3, SPZ maps, ground conditions and groundwater level information should be referred to when designing surface water drainage systems for individual sites.	Noted. These points will be referred to as appropriate during policy formation, SA, and proposals for mitigation of policies
Surface water drainage options should be considered at an early stage in the planning process to ensure there is an acceptable option.	The council is reviewing the SFRA as part of the Local Plan preparation. Surface water drainage will be considered throughout the process and we will continue to liaise and consult with the EA and stakeholders
Urge [the council] that [land west of bewbush] is included within the further SA/SEA process	Land West of Bewbush is included within the SEA boundary. Crawley also recognised the potential need to extend the SEA boundary to include potential development sites outside Crawley's administrative boundary in the SEA. Any revisions to the SEA boundary will be illustrated in the draft Sustainability Report for consultation alongside the Preferred Option Local Plan
The HRA screening report appears to provide a reasonable and objective assessment of the possible effects of the local plan on European Sites. The conclusion that the plan will not have a significant adverse impact (either on their own or "in combination" with other plans) on the European Sites is therefore supported, and on the basis of this report we do not consider that Appropriate Assessment is required.	Noted
The proposed methodology appears appropriate.	Noted
The list of Engagement Partners at Appendix B of the SA/SEA scoping report would benefit from greater representation in relation to the local economy, for example representatives from the Gatwick Diamond, the Coast to Capital LEP, and the Local Economy Action Group would help to ensure a better balance. Higher education providers should also be represented.	Noted. Crawley will ensure the Appraisal process is carried out objectively, considering environmental, social and economic issues. These additional stakeholders will be invited to be engaged in any Appraisal processes as appropriate.
The evidence base previously submitted for the Gatwick Green proposals includes a Baseline Environment and Utilities report, a	These documents will be added to the Plans Policies and Programmes

Comment received	Officer Response
Sustainability Strategy, and an Alternative Site Assessment which will be of relevance for the SA / SEA and HRA.	information in the Sustainability Report
Economic growth aspirations should be fully taken into account when considering the extent to which the plan meets objective 5 (economy). It is important to recognise the need for strategic employment provision as an essential comment in addressing local economic growth aspirations and the wider regional and sub-regional policy framework established through the South East Plan, the Regional Economic Strategy, and the Gatwick Diamond Futures Plan.	Crawley will ensure the Appraisal process is carried out objectively, considering environmental, social and economic issues. A Sustainability Statement prepared for the Gatwick Diamond Local Strategic Statement, and the aspirations of the LSS and other sub-regional documents adopted by the council will be taken into consideration in the Sustainability Appraisal and reflected in the Report
Economic diversification into high value added activity and the growth of the knowledge economy will be important factors to monitor. The provision of a strategic campus style business park has been identified as an opportunity to further develop high quality employment opportunities; progress and take-up of such an opportunity should also be monitored.	Any reasonable policy options will be considered through the Appraisal process, and an appropriate monitoring framework developed
A New Market Town in the Sayers Common area should be tested as an option through the Sustainability Appraisal process	Any reasonable policy options will be considered through the Appraisal process, and an appropriate monitoring framework developed

**APPENDIX C : TOPIC AREA BASELINE INFORMATION, TRENDS,
PLANS, POLICIES AND PROGRAMMES**

Topic Area A – Climate Change, Sustainability, Sustainable Design and Construction

Including: energy efficiency; flooding; air quality; noise; water; waste; climate change; and water supply.

SEA Directive – Climatic Change, Material Assets, Water

Introduction

- A1 Climate change is an issue that has recently come to the fore as awareness has grown of the gravity of its potential effects. Whilst reducing the release of gases that are contributing to climate change is an important aspect to this issue, there are a number of other sustainability issues that the Local Plan will have to consider. For example, parts of the town are already at risk from flooding and, as further development within the borough may lead to increased run-off, there could potentially be increased flood risk if it is not managed correctly.
- A2 Similarly, the issue of waste is also important – the pressure on local landfill sites is increasing as capacity for household and commercial waste dwindles. Material assets are another issue as significant developments are proposed in the town, usually requiring materials sourced from beyond Crawley's boundary. Set out below are the key sustainability issues for the town.

Relevant Plans, Policies and Programmes

- A3 For the purposes of this draft SA report, only the key plans relating to this SA Topic Area are introduced. The list provided is not meant to be exhaustive but to indicate the plans with the most relevance. The relevant plans for this Topic Area are:

General

- A Sustainable Community Strategy for Crawley 2008 – 2026 (CBC, 2008)
- South East Plan (GOSE, 2009)
- National Planning Policy Framework (CLG, 2012)
- Gatwick Diamond Local Strategic Statement (2011)
- Crawley Borough Council's Eco-management Audit System (EMAS) Statement
- Strategy for Energy Efficiency and Renewable Energy, (Nov 2004)
- Corporate Strategy 2010-2015
- Environmental report on the revocation of the South East Plan (October 2011)

Climate Change

- Climate Change Act (2008)
- National Planning Policy Framework (CLG, 2012)
- BREEAM and the Code for Sustainable Homes
- Building Regulations Part L
- Climate Change Strategy (CBC)

Water

- Consultation on the Transposition of Article 6 of the Groundwater Directive (DEFRA, 2008)
- National Planning Policy Framework Technical Guidance (CLG, 2012)
- Crawley Borough Council Strategic Flood Risk Assessment (2011)
- Gatwick Sub-Region Water Cycle Study (Outline Study) (2011)
- London Gatwick Airport Water Quality Management Action Plan 2009-2011
- Thames River Basin Management Plan
- Water Resources Management Plan 2010-2035 (Southern Water, October 2009)

Noise

- National Planning Policy Framework (CLG, March 2012)
- South East Plan (Section 5: Sustainable Natural Resource Management)
- West Sussex Structure Plan 2001-2016 (Policies ERA5, NE19, NE20)
- Gatwick Airport Noise Action Plan 2010-2015 (June 2010)
- West of Bewbush Air Quality and Noise Summary (2007)
- Emerging Sussex Authorities Noise Guidance

Air Quality

- National Planning Policy Framework (CLG, March 2012)
- The Air Quality Strategy for England, Wales, Scotland and Northern Ireland (DEFRA, 2007)
- West Sussex Structure Plan 2001-2016 (Policies ERA4 and ERA5)
- Crawley Borough Council Local Air Quality Management Detailed Assessment of Air Quality (2007)
- West of Bewbush Air Quality and Noise Summary (2007)
- Crawley Borough Council Local Air Quality Management Progress Report (2011)

Waste

- National Planning Policy Framework (CLG, March 2012)
- Planning for Sustainable Waste Management: A Companion Guide to Planning Policy Statement 10 (CLG, 2006)
- Draft Waste Local Plan (West Sussex County Council, 2012)
- Draft Minerals and Waste Core Strategy – Background Papers (West Sussex County Council, 2009)
- Government Review of Waste Policy in England (Defra 2011)
- Emerging West Sussex Minerals and Waste Development Framework
- Crawley Waste Management Strategy 2006 – 2009 (2005)

Issue: Crawley's role as an economic hub and transport interchange means the town's contribution to air pollution and climate change is likely to rise

- A4 The estimated total carbon emissions for Crawley Borough during 2005 was 911 Kilo-tonnes CO₂. Domestic contribution was 214 Kilo-tonnes CO₂ and Industry 428 (DECC Carbon Emissions Calculations 2011). By 2009 total carbon emissions had fallen to 806 214 Kilo-tonnes CO₂ with the Domestic contribution falling to 190 Kilo-tonnes CO₂ and Industry to 386 Kilo-tonnes CO₂.
- A5 Over 17% of Crawley's total carbon emissions are from transport use. During peak hours there are around 35,000 vehicle movements within Crawley. 58% of car trips are less than 5 miles and 25% are less than 2 miles. At the peak school travel time of 8:50am nearly 1 in 5 cars on Crawley roads are taking children to school. 60% of Crawley residents use their car to get to work, the second highest in West Sussex. Crawley is ranked number one in the South East for net in-commuting as there are more people travelling into the area to work than travelling out. Transport is a topic investigated further in Topic Area F.
- A6 Crawley has a higher-than-average proportion of Carbon emissions from commercial and industrial activities. This is due to the presence of activities and industries supporting the international airport. Despite this, the town's compact structure and high proportion of people who both live and work in the borough mean the per capita carbon emissions are lower than or comparable with more rural districts in the County.

Table A1: Per capita CO₂ emissions for West Sussex by sector for 2009

Local Authority	Industry and commercial (tonnes)	Domestic (tonnes)	Road Transport (tonnes)	Total (tonnes)	Population '000s (mid-year estimate 2009)	Per capita emissions (tonnes)
Adur	88	121	97	402	61	5.0
Arun	210	323	218	969	150	5.0
Chichester	321	295	317	1249	113	8.3
Crawley	386	190	115	806	105	6.6
Horsham	275	288	311	1185	130	6.7
Mid Sussex	233	293	321	1168	132	6.4
Worthing	162	212	110	593	102	4.7
West Sussex Total	1673	1722	1488	6372	793	6.2
South East Total	18261	18221	13667	50149	8,436	5.9

Source: NI 186: Local and Regional CO₂ Emissions Estimates for 2005-2009 (Author AEA for DECC, Sep 2011)

Figure A1: Crawley Carbon emissions by sector, 2009

Crawley Carbon Emissions 2009

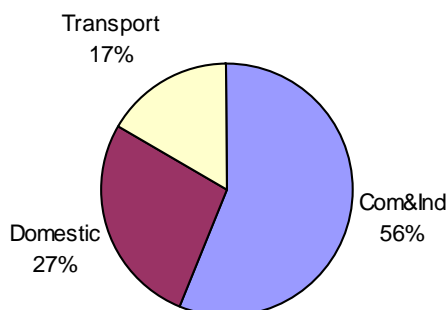


Table A2: CO₂ emissions trends 2005-2009. Crawley and the South East

	Total CO ₂ emissions (tonnes per person)				
	2005	2006	2007	2008	2009
Crawley	7.7	7.3	7.6	7.5	6.6
West Sussex	7.3	7.2	7.0	6.7	6.2
South East	7.0	6.9	6.7	6.6	5.9

Source: NI 186: Local and Regional CO₂ Emissions Estimates for 2005-2009 (Author AEA for DECC, Sep 2011)

Likely evolution without the continued implementation of the Local Plan

A7 Although national legislation and standards for carbon emissions may have an impact on reducing per-capita levels, it is likely that growth of the town and businesses associated with Gatwick will result in an absolute increase in carbon emissions.

What the Local Plan can and cannot do

A8 The South East Plan and Gatwick Diamond Local Strategic Statement seek to develop Crawley as a high profile regional hub and deliver significant numbers of new residential dwellings – objectives not necessarily compatible with reducing the Borough’s impact on the environment. A strong economy could be a key driver in facilitating the private sector and local residents to make the necessary changes and invest in sustainable design and buildings, particularly if the council encourages energy-efficient measures and decentralised and renewable energy.

A9 It is more than likely however, that the scale of development anticipated in the Crawley area is likely to create a net contribution to climate change and air pollution if the number of residents and businesses increases, which means lessening the impact is likely to be the focus for the Local Plan in future years.

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
A1	CO ₂ reduction from Local Authority operations	During 2008/09 an energy saving device was installed in the Town Hall which will save 50 tonnes of CO ₂ each year. The Council ran a 10:10 campaign including awareness raising; provision of grants and funding for carbon reduction schemes; and encouraging sustainable travel.		The council achieved its 10:10 target with a 10.9% reduction in its direct carbon footprint (6.1% reduction in indirect emissions including contractors, service providers etc.)	NI185 Crawley Borough Council’s Eco-management Audit System (EMAS) Statement
A2	Per capita CO ₂ emissions in the local authority area	2009: Domestic: 1.8 tonnes Total Emissions: 6.6 tonnes per capita	2009 South East: Domestic 2.2 tonnes Total Emissions SE – 5.9 tonnes per capita	The domestic figures compare favourably with the South East. Total emissions are higher than the regional average region due to a high contribution from industrial and commercial activity in the	NI186 Crawley Borough Council’s Eco-management Audit System (EMAS)

				borough. Crawley CO2 emissions have decreased by 15% from 2005	
A3	Adapting to climate change	Level 1 (evidence submitted to DEFRA in May 09 that CBC currently at Level 1			NI188

Issue: Crawley has no strategy for managing commercial and industrial waste

A10 In 2010/11 Crawley Borough residents produced 31,639 tonnes of household waste. Of this, 22,573 tonnes (71.3%) was sent to landfill and 9,065 tonnes (28.7%) was sent for recycling, reuse or composting. This contributes to a county wide recycling rate of 41.75%, well above the national average of 39.7%. In 2002/03 Crawley's commercial and industrial sectors produced an estimated 96,143 tonnes of waste. The commercial areas were responsible for 37,015 tonnes (38.5%) and the industrial waste totalled approximately 59,127 tonnes (61.5%).

A11 As a lower tier authority Crawley is responsible for municipal waste collection, and operates weekly waste and fortnightly recyclables and garden waste collection services. Commercial and industrial waste is not collected by the authority, and businesses in the borough commission private waste collection and disposal services. There are no up to date figures available for C&I waste, but 2002 figures suggest that C&I arisings are the greater proportion of waste produced within the borough.

A12 There is potential for the council to work with local businesses to reduce waste production and manage collection. Commercially viable opportunities for renewable energy production within the borough are being explored by the council, and Gatwick Airport Limited has recently issued a tender for management of its on-site CHP unit. Given the high proportion of aviation-related business in Manor Royal and the vicinity of the airport, there is potential for the borough to complement the waste management solutions being progressed by the Airport.

Likely evolution without the continued implementation of the Local Plan

A13 As set out below, the Local Plan's influence over waste production is relatively limited. The commissioning of the Mechanical Biological Treatment (MBT) facility in Horsham District in 2012/13 will manage the County's household black bag rubbish (including Crawley's) and turn as much of it as possible into a resource, significantly reducing the amount sent to landfill. As landfill tax continues to rise and the Government implements measures through the Waste Management Plan to fulfil the requirements of the Waste Directive it is likely that these and social pressures will lead to an increase in the percentage of waste being recycled or reused. County Council plan to produce a Waste Local Plan which will identify strategies and locations for the treatment and disposal of all waste streams.

What the Local Plan can and cannot do

A14 The Local Plan's influence on waste production is limited, however, it may be able to encourage greater levels of recycling and reuse by ensuring new properties include adequate space for recycling boxes etc; and the council continues to make separate collections of recyclable waste separated at the household level. The council can also

ensure, through planning, that waste production during construction is minimised. In developing Crawley's role as an economic regional hub, there remains the potential for new commercial developments and residents to add to the amount of waste produced and energy consumed in the town. The Local Plan can encourage sustainable disposal of unregulated waste by encouraging and providing renewable or low-carbon energy solutions that utilise non-recyclable waste streams.

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
A4	Residual household waste kg per household	529 (kg/hhd) (2010/11) 552(kg/hhd) (2009/10) 561 (kg/hhd) (2008/09) 575 (kg/hhd) (2007-08)	England – 669 (2008/09) 735 (2007/08) South East – 626 (2008/09) 678 (2007/08)	Residual waste sent to landfill is decreasing.	NI 191 EMAS Statement
A5	Household waste recycled and composted	28.7% (2010/11) 29.1% (2009/10) 28.6% (2008/09) 27.4 % (2007/08)	England – 39.7% (09/10) South East 38.4%(08/09) 36.0%(07/08)	There has been a continuing increase in the amount of waste diverted from landfill, from 14.7% in 2001/02. Crawley recycling is still below regional and national levels	NI 192 Crawley Waste Strategy EMAS Statement Update 2009, October
A6	Municipal waste land filled	71.3% (2010/11)	England – 60.3%(09/10) South East – 45.6 % (08/09) 51% (07/08)	Currently a significant amount of municipal waste is sent to landfill compared national and south east percentages.	NI 193

Issue: The concentration of new development in Crawley and the surrounding area may increase the risk of flooding

A15 It is estimated that within Crawley Borough, 846 properties are at 'significant' risk of flooding (i.e. at risk once in every 100 years or more). A further 59 properties are at 'moderate' risk of flooding (i.e. at risk, between once in every 100 and once in every 1000 years). It is also important to recognise that the borough (including Gatwick Airport) is situated immediately upstream of Reigate and Banstead Borough. The pressures for housing within Crawley and neighbouring areas have the potential to increase the likelihood of flooding if issues such as drainage are not managed appropriately. Current evidence from the Strategic Flood Risk Assessment (SFRA) suggests that a relatively small proportion of the borough is currently affected by flooding from the River Mole and its tributaries. The council has recently undertaken an interim update of its SFRA to inform the preferred strategy. This document has been drafted in liaison with the Environment Agency and draws upon the Environment

Agency Flood Map. The areas at risk from flooding within Crawley can therefore be viewed via the Flood Map at www.environment-agency.gov.uk/flood .

- A16 Crawley suffers from flooding from the upper reaches of the River Mole, including the Gatwick Stream, Tilgate Stream, Crawters Brook and Ifield Brook. Projects are underway to reduce flood risk within the region, most notably the Environment Agency's Upper Mole Flood Alleviation Scheme. Work has been completed on the first stage of the project, which has involved raising the height of the dam at Tilgate Park. Later stages of the scheme are expected to be complete by March 2014 including flood attenuation schemes at Clays Lake, Ifield and Worth Farm and environmental enhancement works at Grattons Park.
- A17 Planning guidance has been provided to the Council in the Strategic Flood Risk Assessment review (2012). This document makes Development Management recommendations that should be considered in determining planning applications.
- A18 Further detail is provided in the Gatwick Sub-Region Outline Water Cycle Study (2011). This recommends that to reduce surface water flooding, particularly downstream in Reigate and Banstead, Development Plan Documents should include policies that promote sustainable drainage techniques in all developments. As part of any SuDS policy it is suggested that any redeveloped brownfield sites disconnect their surface water drainage from the foul network.

Likely evolution without the continued implementation of the Local Plan

- A19 The Council has a saved Local Plan policy relating to flooding and has recently completed the Strategic Flood Risk Assessment (2011), Were this policy to be lost, planning applications would still need to conform with national planning guidance and advice from the Environment Agency. However, the local plan policy and the SFRA provide locally relevant data to aid the need to consider flood risk at the local level, and implement locally relevant and cost effective measures.

What the Local Plan can and cannot do

- A20 By providing a framework through which the recommendations of the Water Cycle Study can be implemented, the local plan can play an active role in reducing flood risk. In consultation with the Environment Agency, the local plan can direct development away from areas that are at greatest risk of flooding and ensure that new development is planned to minimise the risks of runoff and flooding downstream. PPS25 advocated a sequential approach that will guide the decision making process (i.e. the allocation of sites). In simple terms, this requires planners to seek to allocate sites for future development within areas of lowest flood risk in the initial instance. Only if it can be demonstrated that there are no suitable sites within these lower risk areas should alternative sites (i.e. within areas that may potentially be at risk of flooding) be contemplated. The technical guidance produced to support the NPPF retains the sequential approach to development in areas at risk of flooding. The council will work in partnership with the local authorities adjoining the authority on this issue.

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
A7	Number of homes and amount of commercial floorspace developed per annum within:	846 in Flood Zone 3 59 in Flood Zone 2			CBC Strategic Flood Risk Assessment (2010)

	Zone 3b – Functional Floodplain Zone 3a – High Probability Zone 2b – Medium Probability Zone 1 – Low Probability				
A8	Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds	EA raised objections to 5 planning applications in 2010/11 on the grounds of unsatisfactory flood risk assessments. 4 of these were permitted following revisions and/or further submissions from developers. One is still waiting for a decision			CLG Core Output Indicator E1

Issue: The potential for development to be concentrated in the Crawley area may lead to water supply issues

A21 As mentioned in reference to the geographical scope of the SA, there is the potential for future development to be built in Local Authority areas adjoining Crawley. Acknowledging the risk that potential new homes and increased population, combined with the level of economic development planned in Crawley, could create water supply issues and associated water quality and infrastructure capacity issues, an Outline Water Cycle Study has been undertaken to investigate the availability of water supply (January 2011).

A21 Although the south east is identified as being subject to significant water stress, the Water Cycle Study outlines that through a twin-track approach of demand management (customer metering, leakage reduction etc.) and resource development (bulk water supply transfer from other areas) there is sufficient water supply to accommodate 7,000 new dwellings at Crawley over the plan period to 2026. To assist the water companies reduce water stress, the document recommends that the council includes water efficiency policies in its Core Strategy Review, an approach that has been endorsed by the water companies.

Likely evolution without the continued implementation of the Local Plan

A22 The Water Cycle Strategy identifies that through the water companies 'twin-tack' approach, sufficient water supply can be made available to support planned development of the adopted Core Strategy at Crawley up to 2026. Southern Water supply Crawley's water and expect to complete the installation of universal water meters for all households by Spring 2012. They are also required to produce Water Supply Management Plans identifying infrastructure capacity and water sources for the future. It is therefore likely that water would continue to be supplied reliably without the implementation of the Local Plan.

What the Local Plan can and cannot do

A23 The Local Plan can play a key role in ensuring an efficient and sustainable supply of water over the plan period by delivering on the advice of the Water Cycle Study to encapsulate its recommendations in the planning policy framework. This approach can lower per capita water consumption in all new homes and commercial premises by encouraging water efficient new buildings and the retrofit of low-water use facilities in existing building stock.

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
A9	Per capita water consumption in relation to supply predictions	2008/09 160 litres per person per day	2008/09 South East average 156 litres per person per day	In the south east there has been a small reduction in daily water consumption, consistent with the downward trend evident in the last five years. Metered householders tend on average to consume less than unmetered householders: in 2008/09 they consumed 23 litres pppd less. It is forecast that by 2020, 78% of all households in the South East will have a water meter. The Regional Economic Strategy target is 135 litres per day by 2016 and Government aspiration as set out in Future Water (Defra 2008) is for a reduction to 130 litres per person per day by 2030.	Environment Agency CBC

Issue: The potential for development to be concentrated in Crawley may lead to sewerage capacity problems

A24 As well as potentially adding to water supply stress, new development at Crawley will invariably take up sewerage network capacity. To establish whether there is sufficient sewerage treatment and network capacity to accommodate identified levels of residential and economic growth, the Water Cycle Study has undertaken further investigation.

A25 Following discussion with Thames Water, the study identifies there will be sufficient capacity at Crawley Wastewater Treatment Works to accommodate planned development up to 2021, subject to the implementation of upgrade works that are scheduled to be completed during 2012/13. Development exceeding this threshold is proposed, additional work would be required to identify solutions for wastewater treatment capacity.

A26 On this basis, taking account of existing planning permissions and Core Strategy housing allocations, the allocated new neighbourhood west of Bewbush (Kilwood Vale) and delivery of a new neighbourhood at the North East Sector, Crawley

Wastewater Treatment Works will be able to accommodate the development of one further new neighbourhood at Crawley up to 2021, to be located at Crawley's North East Sector.

- A27 The study concludes that wastewater treatment/sewage capacity will not represent a constraint to development currently planned in the adopted Core Strategy during the period 2010-2026. It is however recommended that for new developments of 10 or more dwellings, developers should as part of any Water Sustainability and Drainage Assessment demonstrate that the sewerage provider has been contacted to determine if capacity exists offsite for foul and surface water provision. Where capacity off site is not available, developers should ensure that plans are in place for provision ahead of the development's occupation.
- A28 Further, the study concludes that there are at present no environmental constraints (i.e. the capacity of receiving water to receive treated effluent) to development. It is however acknowledged that the Environment Agency may in the future wish to tighten existing discharge consents if Water Framework Directive (water quality) requirements are to be met.

Likely evolution without the continued implementation of the Local Plan

- A29 On the completion of upgrades to Crawley Waste Water Treatment Works in 2012/12, sewage capacity is not expected to present a constraint to development at Crawley. This is however on the basis that the level of housing coming forward at Crawley over the adopted Core Strategy period does not exceed Thames Water's identified capacity of 7,666 new homes. If unplanned developments, or additional developments proposed in the Local Plan were to exceed this housing level it is likely that sewerage capacity would be reached, and further work to ensure sewerage capacity would be required. Without the Local Plan the likelihood of this threshold being exceeded will be hard to predict, and it would be more difficult for Thames Water to plan for and deliver an adequate service.

What the Local Plan can and can't do

- A30 Through continued dialogue with infrastructure providers and a more detailed understanding of housing requirements (if beyond currently identified figures), the local plan can manage the delivery of housing, and if necessary phase development to ensure that sufficient sewerage infrastructure is in place. The approach taken will ultimately depend upon the level of housing that is identified through evidence base and consultation, and this position will evolve as the local plan develops.

Issue: Maintenance of air quality may become increasingly difficult as both town and airport grow

- A31 Crawley Borough Council's air quality monitoring network consists of one automatic monitoring site located at Gatwick Airport which measures NO₂ and PM₁₀, and nine permanent diffusion tube sites for NO₂ distributed through out the borough. Crawley Borough does not monitor Carbon Monoxide, Benzene, 1, 3-Butadiene, Lead or Sulphur dioxide as levels are considered to be relatively low.
- A32 EU Directive air pollution limits require an AQMA be declared if PM₁₀ levels exceed 50 µg/m³ (daily average); or 40 µg/m³ measured as an annual average of NO₂. There were no exceedences of the 50 microgram concentration in Crawley during 2009. PM₁₀ trends over the last 4 years show a reduction in PM₁₀ since 2007 and an overall downward trend since 2004. The average background level of Nitrogen Dioxide in Crawley for 2010 was 28.1 µg/m³, with some local exceedences of the EU standard.

- A33 Principle sources of air pollution in Crawley are the airport and road traffic. Air quality in Crawley is currently of a good standard but may come under increasing pressure in the future if Gatwick continues to expand and development continues to occur in the town without mitigating measures to offset associated growth in vehicle numbers. The prevailing wind direction means that much of the air pollution from Gatwick affects areas to the north and east in Surrey, rather than the town itself; and the built form of Crawley with wide open spaces and planting between built-up areas allows diffusion of pollutants. Consequently Crawley has no Air Quality Management Areas (AQMA) in place. Despite this, air pollution has increased in recent years, and the council continues to monitor the situation and will take action as and when appropriate.
- A34 Pollutant concentrations for all monitoring sites in Crawley (both automatic and diffusion tube) showed sharp increases in 2010 compared to previous years. NO₂ levels at background, roadside and airport sites rose between 30%- 40% in 2010. PM₁₀ concentrations at all of the monitoring sites around Gatwick rose for the first time (by 6%) in three years, but did not exceed National Air Quality Objectives. The long term PM₁₀ trend continues to fall. The exceptionally high levels of pollution in 2010 may be accounted for by a combination of unfavourable climatic conditions encouraging the build up of pollutants, and a prevailing wind direction transporting unusually high levels of pollutants into Crawley from the airport, M23 and the M23 Gatwick spur.
- A35 For NO₂ there is now an upward trend across all locations in Crawley including exceedences of the National Air Quality at four monitoring sites. Two of these sites were at Tinsley Close adjacent to the A2011, and the others were at Northgate Avenue, close to the Hazelwick Roundabout, and at Brighton Road, close to the railway level crossing. Crawley Borough Council will be submitting Detailed Assessments of air quality for the three locations exceeding the Air Quality Objective for NO₂ which will form the basis for deciding if Air Quality Management Areas need to be declared.

Likely evolution without the continued implementation of the Local Plan

- A36 Although national standards for air quality may improve matters in the short term it is likely that they will start to decline again in the future as development of both Crawley town and Gatwick Airport come forward, and traffic increases.

What the Local Plan can and cannot do

- A37 The Local Plan is limited in what it can achieve because despite there being an influence over the sustainability of new buildings; some influence over car ownership in new developments; and the promotion of sustainable travel options, individuals and businesses are responsible for the environmentally based decisions they make on a day to day basis. It is these lifestyle decisions that will ultimately determine the air quality in the town and surrounding area. The growth of the nationally significant airport is another factor largely outside the Local Plan and council's control. Mitigation, to offset air pollution, may be an option that the Local Plan will need to consider further.

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
A10	Level of air quality – reduction in NOx emissions and Particulate matter	NOx: 2010 – 28.1 µg/m3 2009 - 28 µg/m3 2008 – 28.3 µg/m3		PM10 trends show a reduction in PM10 since 2007 and an overall downward trend since 2004. Annual mean NO2 trends over the last 3 years show a rising trend in	NI 194 2011 Air Quality progress report. Crawley Borough Council

	through local authority's estate and operations	PM10: 2010 – 21.9 µg/m3 2009 – 22.4 µg/m3 2008 – 23.5 µg/m3		Borough-wide average readings. 2010 showed a significant rise in NO2 concentrations in specific locations in the Borough, exceeding 40 µg/m3. The Council is undertaking additional monitoring and analysis and will declare an AQMA if and when appropriate.	May 2011
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Issue: Noise has the potential to affect people living, working in and visiting Crawley, particularly aircraft noise in the north of the Borough. The degree to which this will affect people is affected by uncertainty surrounding the future expansion of Gatwick Airport.

A38 Defra have mapped noise across the country in response to the Environmental Noise Directive. Road and rail noise mapping around Crawley identifies several noisy areas around the M23, A23 and A264. Defra are expected to draw up a Noise Action Plan covering the area that will include measures to mitigate excessively noisy areas. Crawley Borough may be expected to take responsibility for implementing some of these measures. Under the Environmental Noise Regulations (England) 2006 it is expected that noise mapping of Crawley will be carried out in 2012 and as a part of that process the council will identify 'quiet areas' for protection against noise. The council will continue to monitor the situation and respond to any noise mitigation measures that are required.

A39 Gatwick Airport is a significant concern for noise pollution in Crawley Borough. Currently, certain areas to the south of the runway are noise affected which means that residential uses are inappropriate in this location. The possibility of a second runway at the airport would result in more of the town being affected by aircraft noise, specifically the North East Sector development area. Planning permission for the development of a new neighbourhood at the North East Sector was granted in February 2011 including several conditions relating to the mitigation of noise. A second runway would significantly increase noise levels. In this context, it is important that new development is appropriately located and designed so that future expansion does not lead to problems for residential properties in the future.

Likely evolution without the continued implementation of the Local Plan

A40 The decisions linked to the development of a second runway at Gatwick will be taken outside of Crawley's Local Plan. Without the Local Plan the council will still be obliged to identify 'quiet areas' for the protection of local tranquillity.

What the Local Plan can and cannot do

A41 The plan can strongly influence the types and location of development within the areas of the town that may be subject to aircraft noise in the future. However, North East Sector Housing allocation, which the Minister advised that he was minded to approve following the Inquiry, could place significant numbers of new dwellings in locations that the Council and national planning policy would ordinarily consider unsuitable for such uses. The production of the local plan will assist in the identification of areas that local people would like protected as local quiet areas – and ensure they are in line with other proposals for development and the protection and use of open space in the borough.

Indicator No.	Indicator	Crawley Data SE/England Data	Trend	Data Sources
A11	Number and type of new developments built in the current and potential noise affected areas	No new developments currently fall within the 60 dB (A)Leq noise contour	As a result of the State of Secretary's decision in respect to the North East Sector, a number of the new residential units and a school will fall within the projected 60 dB (A)Leq noise contour associated with a future second wide spaced runway. Numbers affected will be subject to the detailed design of the new neighbourhood currently in negotiation.	CBC Indicator

Sustainability Appraisal Objectives

Objective One - To minimise climate change and local pollution through the promotion of low carbon and energy efficient transport and buildings; promotion of low/zero carbon and decentralised energy; low pollution technology and the reduction of waste.

Objective Two - To adapt to the effects of climate change through the reduction of the risk of flooding and the amount of waste water; sustainable design of developments, and effective management of water resources.

Topic Area B – Heritage, Character, Design and Architecture

Including urban design, urban environment, cultural heritage

SEA Directive – Cultural Heritage

Introduction

B1 Despite Crawley experiencing significant change and expansion since the New Town designation in 1947, many features of the cultural heritage and design present within the original settlements (Ifield, Crawley, Three Bridges) and the best features of the natural landscape have been preserved and incorporated into the urban fabric of the new town. These features are often fundamental to the 'feel' of the neighbourhoods and the quality of the town's environment, but are increasingly under development pressure as Crawley continues to expand. The key issues in relation to heritage, design and architecture are discussed below.

Relevant Plans, Policies and Programmes

B2 For the purposes of this draft SA report, only the key plans relating to this Topic Area are introduced. The list provided is not meant to be exhaustive but to indicate the plans with the most relevance. The relevant plans for this Topic Area are:

- A Sustainable Community Strategy for Crawley 2008 – 2026 (CBC, 2008)
- South East Plan (GOSE, 2009)
- National Planning Policy Framework (CLG, 2012)
- Crawley Borough Council Corporate Heritage Strategy 2008
- Crawley Baseline Character Assessment (2009)
- Planning (Conservation Area and Listed Buildings) Act 1990
- Crawley ASEQ's and Locally Listed Buildings Heritage Assessment (ABA, April 2010)

Issue: Creating a place that people want to live in and invest in to enhance quality of life and encourage economic growth.

B3 Well-designed buildings and spaces, of which the historic environment is often a part, help create attractive, locally distinctive and valued places in which to live and work. Good design should create buildings and spaces that are easy to use, maintain and adapt and which encourage sustainable travel, healthy living, biodiversity and a sense of well-being.

B4 Significant quantities of existing housing stock fail to meet the Decent Homes Standard. The visual appearance of the town is of importance because it affects the quality of life of residents and its perception and attractiveness to outside businesses and potential residents and investors. This effect is most obvious in the town centre where the appearance and function of certain areas needs updating. This issue is possibly made starker due to the rapid nature of the town's growth during the 50s, 60s and 70s, which has meant that many buildings are of a similar age and style, which is considered outdated by some. Consequently, the perception of Crawley to some outsiders (and outside investment) can be negative.

B5 Despite having grown considerably over a short period of time, Crawley's neighbourhoods have retained distinctive characters. There are 100 listed buildings throughout the Borough, none of which are believed to be at risk. Ifield has the highest number of listed buildings with 22, including two Grade I properties. The High Street has 13 listed buildings including 4 II* properties. There are 4 Scheduled Ancient Monuments, 13 Archaeologically Sensitive Sites and 38 other areas of suspected archaeological interest. There are 6 historic parks included within West Sussex County Council's list of sites of archaeological interest.

B6 There are currently eight conservation areas in the borough, defined as areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance. These are: The High Street, Ifield, Worth, Forestfields & Shrublands (in Furnace Green) Dyers Almshouses (Northgate), Sunnymead Flats and St Peter's (both in West Green) and the newly designated Brighton Road Conservation Area, which was adopted on the 25 March 2009. At present there is also additional work being undertaken to assess the potential of designating 5 additional Conservation Areas.

B7 There are nine designated Areas of Special Environmental Quality (ASEQs) in Crawley, which are locally important areas of special environmental quality. Five of these are located in Pound Hill. These ASEQ's and other potential new areas are under review as part of the Local Plan consultation.

B8 The council has prepared a number of plans, including the adoption of a Corporate Heritage Strategy in June 2009 and more recently the Crawley Baseline Character Assessment and ASEQ review 2009, which provides a baseline character assessment of the town and indicates the need and opportunity for revisions and new Conservation Areas and Areas of Special Environmental Quality. The Crawley Extensive Urban Survey (EUS) which forms part of the Sussex (EUS) is a survey of Historic Towns in Sussex, and part of a national survey programme to assess smaller historic towns of England county by county. The Sussex EUS will deliver a unique and flexible tool to aid the understanding, exploration and management of the historic qualities of 41 of the most significant towns in Sussex and is being prepared by a consultant on behalf of West Sussex County Council (with funding from English Heritage).

Likely evolution without the continued implementation of the Local Plan

B9 Without the continued implementation of the Local Plan it will be harder for the council to continue to rejuvenate areas of the town that are struggling. Whilst aspects of the town's heritage are already protected, there are other areas, particularly within the New Town, that could continue to be negatively affected or even completely lost without the continued implementation of the Local Plan.

What the Local Plan can and cannot do

B10 Through Local Plan policies and design guidance, the quality and local distinctiveness of new development can be enhanced. Similarly, for sites owned by the council, like Neighbourhood Parades, the council will continue to implement the Neighbourhood Parade Improvement programme to address the aging appearance of the neighbourhood centres. Furthermore, subject to the other policy considerations, the culturally important areas of the town can continue to be protected and it is likely that further conservation areas and ASEQs will be identified and protected.

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
B1	Number of listed buildings on the Buildings at Risk Register	100 on CBC Register			CBC register English Heritage at Risk

B2	Percentage of conservation areas with up-to-date Appraisals (i.e. last 5 years).	One Conservation Area Statement Currently reviewing 9 statements	N/A	These Appraisals will be reviewed in detail to tie in with the preparation of the Local Plan.	Local Performance Indicator
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Sustainability Appraisal Objective

Objective Three – To protect and enhance the valued built environment and character within the Borough through high quality new design and the protection of culturally valuable areas and buildings.

Topic Area C – Housing

Including: housing need, aspirations, and strategic development locations.

Introduction

C1 Set out below are the issues and problems associated with housing provision and quality in Crawley. Housing is a separate topic area because of the importance of housing to peoples' quality of life, the economy and its contribution to sustainable living.

Relevant Plans, Policies and Programmes

C2 For the purposes of this draft SA Report, only the key plans relating to this Topic Area are introduced. The list provided is not meant to be exhaustive but to indicate the plans with the most relevance. The relevant plans for this Topic Area are:

- The Plan for Growth (BIS, March 2011)
- National Planning Policy Framework (CLG, 2012)
- Laying the Foundations- A Housing Strategy for England (CLG 2011)
- South East Plan (GOSE, 2009)
- Crawley, The Housing Strategy 2009-13 (CBC, 2009)
- A Sustainable Community Strategy for Crawley 2008 – 2026 (CBC, 2008)
- Housing Act (2004)
- Homes for the future: The Housing Green Paper (CLG, July 2007)
- Planning Policy for Traveller Sites (CLG, 2012)
- Delivering Affordable Housing (DCLG, 2006)
- Northern West Sussex Strategic Housing Market Assessment (2009)
- Gypsy and Traveller Accommodation Assessment (WSCC, 2007)

Issue: The economic downturn is affecting the delivery of housing.

C3 Housing delivery in the period 2000 to 2005 was generally weak as the Borough's new neighbourhood allocation (in the northeast sector of the town) was safeguarded for the possible expansion of Gatwick Airport, thus preventing development in that location. However, between 2006 and 2008, delivery rates picked up significantly as a number of Core Strategy strategic allocations and windfall sites gained planning permission and were developed. Over recent years, the downturn in the economic climate has gradually slowed the delivery of sites creating a potential delivery issue, and although the North East Sector was granted planning permission by the Secretary of State in February 2011, development of the site will not commence until detailed matters are subsequently agreed. Therefore, a key priority for the council is to work to lessen the effects of the economic downturn by bringing forward sites for housing development and assisting those who wish, to access a home which meets their needs and budget.

Likely evolution without the implementation of the Local Plan

C4 Without the development of the Local Plan and identification of housing sites, the long-term housing land supply position is uncertain and opportunities to tackle and rectify the shortfall in delivery that is predicted will be lost. Without an agreed spatial development strategy which underpins the Local Plan, housing sites may come forward in unsustainable locations, or in strategic sites prejudicial to the long term aspirations of the council.

What the Local Plan can and cannot do

C5 Whilst planning policy can be made more flexible to ensure that the viability of schemes is maintained, the two key determinants of supply and demand – access to developer finance and purchaser finance – are beyond the control of the Local Plan and therefore difficult to influence through the planning process.

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
C1	Plan period and housing delivery targets	<p>Average 303 p.a. over 2001-2011; And 461 p.a. over 2006-2011 compared to targets:</p> <p>West Sussex Structure Plan - 1/07/2001 to 31/03/2016 = 4500 or 300 per annum</p> <p>South East Plan - 1/04/2006 to 31/03/2026 = 7500 or 375 per annum</p>	South East Plan 28,900/ annum for region over period 2006-2026		CLG Core Output Indicator H1
C2	Trajectory comprising: a) Net additional dwellings – in previous years b) Net additional dwellings – for 2010/11 c) Net additional dwellings – in future years Managed delivery target	<p>a) 1924 delivered over 2006-10</p> <p>b) 384 (net) in 2010/11</p> <p>c) 1597 projected over 2011-16</p>		There has been a reduction in the provision of new dwellings from the 679 net dwellings provided in 2007/08 to 384 in 2010/11 reflecting a general slow down in the housing market as a result of the recent economic recession	CLG Core Output Indicator H2 (a), (b), (c), and (d)
C3	Net additional pitches (Gypsy and Traveller)	Nil	<p>Authorised Sites with Planning Permission England: July 09 – Socially Rented - 6603 Private - 7105</p> <p>South East : July 09 – Socially Rented -1255 Private - 1604</p>	The Gypsy and Traveller Accommodation Assessment 2007 identified need for 22 pitches in Crawley and need for a transit site in the north of West Sussex.	CLG Core Output Indicator H4 The bi-annual Count of Gypsy and Traveller Caravans

C4	Gross affordable housing completions	2010/11 - 134 (35% of supply)	2007/08: England: 60,630 (2010/11) 58,010 (2009/10) 53,730 (2007/08)	Crawley relied increasingly on affordable housing supply until 2010/11 when the proportion of affordable homes dropped. 44% of dwellings completed in the last four years were affordable – higher than the Council's policy target. The number of affordable dwellings provided in England is increasing	CLG Core Output Indicator H5 CBC Housing Strategy CLG Housing and Planning Statistics
		2009/10 - 282 total (68% of supply)			
		2008/09: - 148 total (40% of supply)	South East 10,130 (19%)		
		2007/08: - 232 total (33.7% of supply)			

Issue: Housing stock does not match the needs and aspirations of the Borough over the next 20 years

- C6 Baseline data collected in relation to demographics, indicates that the population of Crawley has risen significantly over the past three decades, increasing by about 28% from 82,000 in 1981 to 105,000 in 2009. This rate of growth has exceeded levels achieved in the wider South East Region over the same period. In terms of population structure, Crawley's population has a greater proportion of younger people between the ages of 25 and 34 and a lower percentage of elderly people, compared with the rest of the South East. Inward migration to Crawley has also been outstripping out-migration, which is contributing towards continued population growth.
- C7 Looking to the future, population projections indicate continued growth in the order of about 22% between 2010 and 2031, reflecting the relatively young age profile of today's population. Over the next 20 years, births are expected to exceed deaths by a factor of around 2:1. This natural change, combined with trends in people living longer and increasing proportion of people living alone or in smaller households, means that there will be a significant requirement for additional housing in the future.
- C8 Despite an increasing proportion of smaller households, the housing market will continue to be dominated by families. However, there is increasing demand for housing to meet the needs of the over 65s, such as bungalows and homes that support assisted living for the elderly. At the same time, the bulk of housing in Crawley is predominately smaller homes or flats, between one and three beds and usually terraced. Qualitative evidence suggests that current housing stock does not meet the aspirations of the community, the economy, or families seeking larger properties and that increasing numbers of homes are not meeting the 'Decent Homes' standards. Therefore, a priority for the Local Plan will not only be to facilitate the delivery of housing but to ensure the correct types and quality of housing are available in the correct locations to support the needs and aspirations of a changing population.

C9 The number of households in Crawley increased by 43% from 30,000 in 1981 to 43,000 in 2008. This increase is greater than the growth in population over the same period. Average household sizes have declined from 2.74 in 1981 to 2.41 in 2008. This is consistent with national trends, which have seen shifts in household composition towards smaller household sizes. The change in the number of households between 1981 and 2009 equated to an average of 482 per annum. CLG project a figure of 520 per annum for the period 2008 to 2033 based on 2008 population projections. This implies greater household growth in the future than previously which is again consistent with national trends and which is being driven by population growth and changing household composition.

Likely evolution without the continued implementation of the Local Plan

C10 It is considered that without the development of appropriate planning policies with regard to house size, type, location, affordability and tenure, the disparity between residents housing needs / aspirations and new housing stock will not be addressed.

What the Local Plan can and cannot do

C11 If required, planning policy could specify the required housing mix (i.e. tenure, type, size) for development based upon current need and subject to scheme viability. These issues will be explored further through the Local Plan consultation process and associated dialogue with housing providers, residents and elected members.

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
C5	Mix of affordable housing delivered compared to the indicative affordable housing provision by bedroom size identified in the most recent SHMA (1-bed - 20%, 2-bed – 35%, 3-bed – 35%, 4-bed – 10%)	Requirement by bedroom size: 1-bed (474) 43% 2-bed (325) 29.5% 3-bed (286) 26% 4-bed (17) 1.5% (based on 2007/08 Core lettings data)		The greatest demand trend is for smaller homes, but those waiting for larger family homes currently wait the longest for suitable properties.	CBC, first Strategic Housing Market Assessment 2009
C6	Further work is required to identify a suitable housing need mix for the private sector				

Issue: Affordable housing provision does not match the level of need

C12 Affordable housing delivery, as previously reported, has been strong in recent years. However, the numbers of people believed to be in housing need, which includes affordable and intermediate forms of housing, is continuing to increase. Family groups, requiring large housing are currently waiting the longest due to the types of dwellings

currently being built in the town (mostly one and two bed properties). One particular group who require attention are those who can afford to pay more than social rented, but cannot afford open market housing. There is therefore a need to provide intermediate forms of housing provision.

Likely evolution without the continued implementation of the Local Plan

C13 The council has existing policies that relate to the provision of affordable housing and therefore, the supply would not necessarily be affected. However, the opportunity to revise targets and update the composition of need may be lost.

What the Local Plan can and cannot do

C14 Whilst the council cannot make developers develop sites in the current climate, it can introduce policies that require the correct tenure, types and mix of housing, in the correct locations, subject to viability. The existing Core Strategy policy requires 40% affordable housing on developments of 15 units or more or on developments over half a hectare in size.

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
C7	Estimated number of households in housing need (per annum)	103 – 250 affordable dwellings per annum	n/a		CBC Strategic Housing Market Assessment 2009
C8	Number of people on the housing need register by size of accommodation required	20010/11 1 bed= 1,281 2, 3 and 4 bed= 1,478 Sheltered/retirement= 309 Total= 3,068 2009/10 1 bed= 1,337 2, 3 and 4 bed = 1,321 Sheltered/retirement= 328 Total = 2,986 2008/09 1 bed (singles and couples) = 1279 2 & 3 & 4 bed (families) = 1270 one & two bed sheltered = 302 Total = 2851	n/a	The number on the housing needs register has increased over the past three years, suggesting that supply does not meet demand for affordable housing. The need for 2,3 and 4 bed homes is increasing faster than the need for 1 bed or sheltered accommodation.	CBC Strategic Housing Market Assessment 2009 CBC Housing Strategy AMR

Issue: Land supply in the Borough is limited

C15 As Crawley’s boundary is tightly drawn around the built-up area boundary, there is a limited supply of undeveloped and unconstrained land in the borough. Understandably, this has strong implications for meeting housing need and aspirations. Recent developments have tended to be flatted one and two bed schemes, because of the types of housing sites that are available in the town. Building family and aspirational homes whilst meeting the numerical requirements of the borough will be dependent upon ensuring the efficient use of land. With the release of the large North East Sector Greenfield site, a significant amount of housing will be able to be provided, but work on housing needs indicates that still more housing will be required to serve the development of the borough.

Likely evolution without the continued implementation of the Local Plan

C16 Without an updated Local Plan the Council would not be able to demonstrate a five-year housing supply in the longer term, even with the release of the North East Sector for 1900 dwellings. Whilst windfall sites would continue to come forward, the strategic and proactive management of housing delivery may be weak.

What the Local Plan can and cannot do

C17 The identification and timely release of land is not entirely within the Council’s control because of mixed land ownership. Furthermore, there is growing pressure / reliance on land adjoining the borough, outside of authority. Crawley has been identified in the South East Plan as a regional hub and it is possible that Crawley may become the strategic focus for development in the sub region. The Local Plan can attempt to maximise the availability of land, of the correct type and in suitable locations to meet need.

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
C9	Supply of ready to develop housing sites (5-year housing land supply)	5-year housing land supply (1 st April 2011 to 31 st March 2016) = 1598	n/a	The 5-year housing land supply has tended to be strong in the past few years, but the effects of the recent economic climate are likely to weaken the delivery of sites in the short and medium terms.	NI 159
C10	New and converted dwellings – on previously developed land (PDL)	2010/11: 82.4% of completions 2009/10 86.9% of completions 2008/09: 86.7% of completions 2007/08: 66.5% of completions		A significantly greater portion of new dwellings were developed on previously development land in Crawley in the last year than in 2007. 2010/11 figures were slightly lower than 2009/10, but the proportion of PDL has remained stable over the last 3 years.	CLG Core Output Indicator H3 Annual Monitoring Report CLG Housing and Planning Statistics 2009

C11	Average density of new residential development	<p>2010/11 All sites with new development completed: 74dph 10+ units: 74dph <10 units: 38dph</p> <p>2008/09 All sites – 67.8 dwellings/ha 10+ unit sites - 70.6 dwellings/ha Up to 9 unit sites - 40.0 dwellings/ha</p>			Annual Monitoring Report
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Sustainability Appraisal Objective

Objective Four - To ensure that everyone has the opportunity to live in a decent and affordable home.

Topic Area D – Economy

Including: maximising benefits of Gatwick Diamond, vibrant town centres, strong economic growth.

Introduction

D1 The success of the local economy is an important topic area for the social, economic and arguably the environmental wellbeing of the town. A strong economy is likely to spread wealth amongst the population, provide employment opportunities and help raise aspirations locally. Moreover, as demonstrated in the economic climate of 2008 and 2009, without a growing economy, much of the social, economic and physical improvements planned are not achievable. Therefore, promoting a strong economy is likely to be one of the key drivers for improving the town.

Relevant Plans, Policies and Programmes

D2 For the purposes of this draft SA Report, only the key plans relating to this Topic Area are introduced. The list provided is not meant to be exhaustive but to indicate the plans with the most relevance. The relevant plans for this Topic Area are:

Employment and Town Centres

- A Sustainable Community Strategy for Crawley 2008 – 2026 (CBC, 2008)
- National Planning Policy Framework (CLG, 2012)
- A Sustainable Community Strategy for Crawley 2008 – 2026 (CBC, 2008)
- Gatwick Diamond Futures Plan 2008 – 16
- GHK Diamond Report (October 2008)
- Crawley's Economic Plan (CBC, 2011 – 16)
- Local Development Framework Diamond Report (GVA Grimley)
- Town Centre North revision SPD (CBC, 2011)

Issue: Existing building stock supply does not match the current or long-term needs of the changing economy, both within the dedicated business areas and within the town centre

D3 Qualitative evidence from local companies suggests that the original business estates created as part of the New Town and which predominately provided industrial type floorspace do not match the needs of the growing tertiary or 'knowledge' economy in the town, although in the short term the Employment Land Review (ELR) suggests that warehousing is likely to be most economically viable in areas such as Manor Royal. In the town centre there are currently high levels of vacancies in A-grade office space. Provision of the correct types and quality of commercial building stock is important, because a strong local economy will be a key driver for wider improvements.

Likely evolution without the continued implementation of the Local Plan

D4 Whilst the lack of an updated Local Plan would restrict improvements in some regards, the existing policies should continue to enable changes to be made. With limited land holdings in the employment areas of the town, the council has no direct influence on what gets built and where.

What the Local Plan can and cannot do

D5 The ELR shows how the Local Plan could potentially help facilitate a step change by improving the town centre to attract businesses into A-grade office space; and protecting employment land outside the centre for uses suitable for the long-term trends in economic growth (that is, towards the knowledge economy and high-tech industry). The plan can highlight through design codes and policy the types of developments that are appropriate in particular locations, helping to encourage the private sector to meet the needs of individual business and the local economy as a whole. Environmental impacts can be limited and mitigated to some extent through

relevant policies. Strong policies could control the type of development and phasing to meet long term aspirations, but this is likely to prove more difficult under the NPPF.

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
D1	Total amount of employment floor-space completed – by type	<p>2010/11 <i>B2</i> – 4,966m2 gross (357m2 net) <i>B8</i> – 2,767m2 gross (2,767m2 net)</p> <p>2009/10 <i>B1c</i> – 1,947m2 net <i>B2</i> – 368m2 gross <i>B8</i> – 14,335m2 gross</p> <p>2008/09 <i>B1a</i> – 22,819m2 net <i>B2</i> – 556m2 gross <i>B8</i> – 2174m2 gross</p>	Crawley has over 49% of B-type employment floor-space in the Gatwick Diamond subregion.	2008/09 saw a significant addition made to the total amount of employment space within Crawley. Since then most growth has been in B2 and particularly B8 warehousing space. This short term trend is likely to be overturned by a longer term demand for tertiary office space to support the knowledge economy and high-tech industry.	CLG Core Output Indicators: Business Development and Town Centres (AMR)
D2	Employment land available – by type	<p>2010/11 <i>B1a</i> – 10.55 Ha <i>B2</i> – 8.46 Ha <i>B8</i> – 0.04 Ha</p> <p>2009/10 <i>B1a</i> – 13.36 Ha <i>B1mixed</i> – 8.56 Ha <i>B2</i> – 5.97 Ha <i>B8</i> – 0.37 Ha</p>		The total amount of employment floor-space allocated and with permission for development has decreased as fewer planning permissions for development have come forward.	CLG Core Output Indicators: Business Development and Town Centres (AMR)
D3	Total amount of floor-space completed for town centre uses	<p>2010/11 Total of 1601m2 gross in the Local Authority</p> <p>2009/10 Town Centre</p>	Crawley has 53% of total office floor-space in the sub-region, but weak demand has left A-grade		CLG Core Output Indicators: Business Development and Town Centres (AMR)

		– total 622m2 gross <i>Local Authority</i> - Total 125m2 gross	space vacant		
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Issue: Local skills do not match the requirements of local business, resulting in significant in-commuting to the Borough from surrounding areas

D6 Census data, supported by the views of local business, suggests that local skills do not match the skill requirements of local business. The result of this is significant in-commuting into the town on a daily basis (31,000 per day according to the 2001 census) as most high-level positions appear to be occupied by individuals living outside of the Borough. Not only does this limit the benefits that Crawley's employment sites bring to the local population, but there are environmental concerns arising from large number of people travelling to Crawley on a daily basis and their methods of transportation. In addition, a lack of local skills and the limited availability of undeveloped land may be limiting the local economy's performance and creating/reinforcing the mismatch between housing and employment. If Crawley develops to meet the strategic sub-regional economic growth aspiration then employment growth in the Borough could exacerbate the problem.

Likely evolution without the continued implementation of the Local Plan

D7 The long-term trend for this issue is uncertain because the Local Plan has little control over the educational achievements of the population. However it is likely that without planning controls over the location of employment and the quality of housing stock, higher-paid employees will continue to live outside the borough and commute in to work.

What the Local Plan can and cannot do

D8 The Local Plan has little direct control over the skills that the population of the town hold, but can influence the housing stock and type of employment in the borough to achieve a better match between the people living in the Borough and the type of work they do. The Plan can work to maximise the potential for new educational facilities within the town, possibly including a University campus (as supported by the Gatwick Diamond Local Strategic Statement), and to maximise the strength of the local economy. This may then maximise the opportunities and motivations for the population of the town.

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
D4	Working age population qualified to at least Level 4 or higher	23% (2008)	SE = 31.5% GB = 29% (Jan – Dec 2008)	An increase from the 2007-08 figure of 17.2%, however, still the lowest within West Sussex and below both the South East and Great Britain figure	NI165 NOMIS

Issue: The economic structure of the town is moving from one dominated by large scale airport related business to one where professional services are becoming increasingly strong

D9 Work by the council suggests that the presence and economic prominence of Gatwick Airport might be concealing potential structural weaknesses in Crawley's economy.

This has reportedly left the town poorly placed to capitalise upon the higher value professional sector's potential need for good quality office space in the south east, M25 area, and particularly Crawley. This potential reliance upon a few large-scale businesses, focussed within a limited set of economic sectors may make the town more susceptible to economic cycles and limit the local population's choice of employment and career opportunities. There is however a move towards the professional sector and this is something that the council should seek to maximise.

Likely evolution without the continued implementation of the Local Plan

D10 As set out below, the Local Plan's influence over this issue is considered to be limited, however, without up-to-date policies the Council would have even less control over this area and it is likely that the town may continue to be susceptible to the short term market demand for employment space dictated by economic cycles.

What the Local Plan can and cannot do

D11 As already mentioned, with limited land holdings in the town, the Local Plan has no direct influence over the floorspace types provided. However, through policy, the Local Plan may be able to support the private sector as they provide for the market's needs. With strong policies the council could control the type and phasing of new floorspace to meet the long term aspirations of Crawley and the Gatwick Strategic Statement, although this may prove more difficult through the NPPF policies to avoid long term protection of employment space.

Indicator No.	Indicator	Crawley Data SE/England Data	Trend	Data Source
D5	Top 5 growth and decline sectors in the economy	<p>Top 5 Growth Sectors</p> <p>1 – Legal, accounting, book keeping and auditing activities, consultancy, market research and public opinion polling, business and management consultancy, holdings = +974 (57%)</p> <p>2 – Monetary intermediation = +407 (+39%)</p> <p>3 – Retail sales in non-specialised stores = +365 (+12%)</p> <p>4 – Software consultancy and supply = +350 (+82%)</p> <p>5 – Post and Courier activities = +334 (+21%)</p> <p>Top 5 Declining Sectors</p> <p>1 – Labour recruitment and provision of personnel = -861 (-22%)</p> <p>2 – Manufacture of other food products = -770 (-77%)</p> <p>3 – Scheduled air transport = -753 (-9%)</p> <p>4 – Data processing = -743 (-78%)</p> <p>5 – Activities ancillary to insurance and pension funding = -441 (-51%) (between 2003 and 2005)</p>		CBC: Annual Business Inquiry Employee Analysis 2005

Issue: The retail sector of the town's economy has been declining in recent years and there is capacity for a step change improvement in the quality of the town centre.

D12 As part of the evidence base for the town centre based policies of the Council's submission Core Strategy (2007), the retail capacity of Crawley's catchment area was

assessed on four separate occasions by consultants CBRE and GVA Grimley. These studies concluded that there was significant unmet retail expenditure, and a particular shortfall in quality shopping in the region, and backed up the evidence for the South East Plan. Experian rankings show Crawley has fallen in retail quality in comparison with other centres in recent years. Policy TC1 of the adopted Core Strategy (2008) allocates Town Centre North for a major mixed-use, retail led development. In late 2008, the council and its then development partner, Grosvenor, were close to finalising a Development Agreement for a proposed scheme. However, the severe recession which emerged during this period resulted in Grosvenor considering the scheme not to be viable at that time and it was not pursued.

- D13 The council remains committed to a step change in the town centre offer, including a significant town centre redevelopment scheme. Before re-embarking on any discussions with potential development partners, it was considered appropriate to reassess the likely capacity and viability for a scheme to be delivered within the Local Plan period. In 2010, therefore, DTZ were commissioned to prepare a new Retail Capacity and Impact Study, to assess the viability and delivery of Town Centre North, and to advise on a strategy for the future of the Town Centre. Alternative sites and options for Town Centre growth were analysed by DTZ to identify the most appropriate strategy for delivering new retail development in the town. These studies conclude:
- Crawley Town Centre is currently vital and viable as a retail centre but has a lack of modern retail opportunities to meet the demand of the catchment;
 - There is an opportunity to deliver new comprehensive retail development to accommodate future retail demand;
 - Sufficient expenditure capacity is forecast for a major retail, “step-change” development in the Town Centre;
 - A major scheme in Crawley would not be likely to have an unacceptable impact on the existing Town Centre or on neighbouring town centres;
 - A major single scheme, like the 2008 Grosvenor scheme, is unlikely to be viable and deliverable in the current marketplace;
 - The Council can still achieve its ambitions for step-change if it restructures its approach to the scheme with the scheme being phased, and different developers taking on different elements;
 - The focus should remain on the TCN area of the town for the major scheme;
 - There will need to be a reduced core retail element but it should still be able to create step-change and support a department store.
- D14 There remains an untapped opportunity for mixed-use in the town centre comprising of retail, office, leisure and residential. The centre is a sustainable location for all these uses, placing people and business at the heart of the transport interchange, providing new jobs and homes (including affordable housing) and providing the opportunity to improve the urban environment of the town centre. There is therefore, potential for the out flow of retail expenditure to be reversed with increasing numbers of people travelling to the town centre from outside the Borough, reducing the amount of travel across the region to larger centres further away, and this is an issue that requires further monitoring. Crawley is identified in the Gatwick Diamond LSS as the potential regional centre for the sub region. Establishing a much stronger town centre will also help resist the development of out of centre retail elsewhere in the borough on less accessible sites.

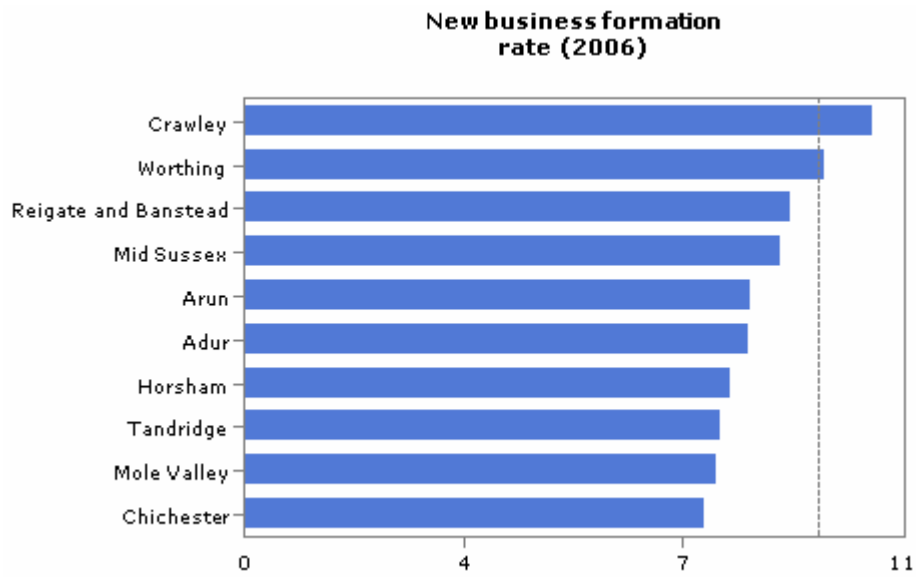
Likely evolution without the continued implementation of the Local Plan

D15 The council has just revised and adopted its SPD for Town Centre North, to provide more flexibility and allow the scheme to be delivered in phases (Nov 2011). There is also a recent Town Centre Wide SPD (2009). These documents, together with the adopted Core Strategy establish a reasonably robust planning framework for the consideration of town centre and retail development in the borough. However, the economic recession and slow recovery mean that the town centre is declining, securing major town centre development is more difficult and increasing challenges to current policy are being received from out of centre retail proposals. Up-dated policies are therefore important to help encourage investment in the town centre and resist out of centre development.

What the Local Plan can and cannot do

D16 The Local Plan can help to facilitate a step change in the quality of the town centre and can go some way to ensuring that it is fully accessible by sustainable modes of transport. There are other aspects to improving the town centre that are largely beyond the Local Plan's control however, such as tackling antisocial behaviour (although measures such as Secured by Design can play a role) and the availability of finance for developers.

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
D7	Ranking of Crawley town centre retail offer compared to other centres in the UK	Experian retail rankings for Crawley: 2009 – 70 th 2008 – 69 th 2007 – 55 th in the national retail hierarchy.		Whilst there has been a fall in Crawley's ranking from 2007, future developments taking place within the town centre will inevitably have a positive impact on Crawley's ranking in the future.	CBC
D8	New Business registration rate (the proportion of business registrations per 10,000 resident population aged 16 and above)	2008/09 – 47.5 2007/08 – 46.9 2006/07 – 40.8 2002/03 – 47.5	Regional Average 2008 – 60 2007 – 62.9 2006 – 58.9 2002 – 59.3 National Average 2008 – 57.2 2007 – 59.5 2006 – 54.8 2002 - 54	VAT business stock declined in the year 2009/10 by 3.23%. It is assumed that this is a sign of the economic slow down. Evidence suggests Crawley remains an employment hub within the Gatwick Diamond sub-region.	NI 171



Source: CBC Economy Profile, Local Knowledge; Business start-ups and closures: VAT registrations and deregistrations (2006)

Sustainability Appraisal Objective

Objective Five - To maintain, support and promote a diverse employment base that can serve the local and sub-regional and regional economy.

Topic Area E – Natural Environment

Including: countryside, landscape, biodiversity, fauna, flora and soil

SEA Directive – Biodiversity, Landscape, Air Quality, Fauna, Flora and Soil

Introduction

E1 Although the borough is predominately urban, there are small areas of countryside fringing the urban area which are of significant importance to the setting of the town and the biodiversity within and surrounding it. In addition, Greenways are more common within the town than one might expect and these areas, in conjunction with the urban fringe areas, facilitate the movement of wildlife through the town. These areas also play a role in the maintenance of air quality in the town, mitigating against the urban heat island effect, and some of the pollutants associated with an urban area and an international airport. However, in light of development pressure and limited funding for their improvements, the natural environment of Crawley is under particular pressure.

Relevant Plans, Policies and Programmes

E2 For the purposes of this draft SA Report, only the key plans relating to this SA Topic Area are introduced. The list provided is not meant to be exhaustive but to indicate the plans with the most relevance. The relevant plans for this Topic Area are:

General

- A Sustainable Community Strategy for Crawley 2008 – 2026 (CBC, 2008)
- South East Plan (GOSE, 2009)
- National Planning Policy Framework (CLG, 2012)
- EU Habitats Directive 99/43/EEC(1992)
- The Natural Choice: securing the value of nature (DEFRA June 2011)
- State of the environment 2007, South East England (Environment Agency)

Landscape/Countryside

- National Planning Policy Framework (CLG, 2012)
- Landscape Character Assessment (CBC 2012)
- Built-up Area Boundary Review (CBC 2012)
- PPG 17 Assessment - Open Space Sport and Recreation Study (PMP July 2008)
- South East Green Infrastructure Framework (LUC 2009)
- West Sussex Sustainability Strategy (2005-2020) (West Sussex Sustainability Forum), 2005
- West Sussex Landscape Character Assessment, (Land Management Guidelines for Northern Vales, High Weald Forests and adjacent High Weald) (WSCC, 2003)

Biodiversity

- National Planning Policy Framework (CLG, 2012)
- Planning for Biodiversity and Geological Conservation: A Guide to Good Practice (DCLG, DEFRA and English Nature, March 2006)
- A Biodiversity Action Plan for Sussex (Sussex biodiversity Partnership, 1998)

Issue: The lack of development land is increasing the threat to nature areas, open spaces and green infrastructure within the urban environment

E3 There are no Special Protection Areas (SPAs), Special Areas of Conservation (SACs) or Ramsar sites within the borough. However, the Ashdown Forest SPA and SAC and the Mole Gap to Reigate Escarpment SAC are both within 15 km of the Borough's boundaries, and therefore the Council has published a Screening Report alongside this SA Scoping Report to establish whether the Local Plan will need to be subject to an Appropriate Assessment. Ashdown Forest SPA and SAC are designated for healthland, great crested newts, nightjars and Dartford warblers. Mole Gap to Reigate

Escarpment SAC is designated for its box scrub, grasslands, woodlands, heaths, great crested newts and Bechstein's bats. Additional development in Crawley can reasonably be expected to result in an increase in numbers of people visiting these sites, and travelling through them. It is not currently expected that this impact will be significant. For further information on the potential for the local plan to impact these protected environmental assets please view the HRA Screening Opinion accompanying this consultation.

- E4 The borough has designated 12 Sites of Nature Conservation Importance (SNCIs) covering 329.8 hectares in total. SNCIs are designated for their local flora and fauna interest and value. These sites incorporate semi-natural woodland, conifer and mixed plantations, copses, hedges, neutral grassland, species rich grassland, heathland, and streams and ponds. Amongst the species found within the borough are several identified in the Sussex Biodiversity Action Plan (BAP), which are also subject to protection under British and European legislation. These include Kingfishers, Nightingales, Adders, Palmate Newts, Water Shrews, Orange-tip and Holly Blue Butterflies, Small-Leaved Limes, Betonys and Common Spotted Orchids. The borough also contains several areas of importance to BAP Habitats.
- E5 There are 6 Local Nature Reserves covering 279.8ha land in Crawley, which have wildlife and/or geological features that are of local importance: Target Hill, Grattons Park, Tilgate Forest, Broadfield Park, Waterlea Meadows and Willoughby Fields. There are 193.5 hectares of Ancient Woodland within the borough and a significant number of large environmentally valuable trees scattered throughout the town that are under increasing pressure from development and the availability of funds for maintenance. The loss of these features would alter the character and appearance of the town.
- E6 When designated as a New Town, Crawley was planned with significant amounts of green spaces within the built up area to provide an attractive layout and to help distinguish between the different neighbourhoods. The 2008 Planning Policy Guidance 17 (PPG17): Open Space, Sport and Recreational Assessment identified significant amounts of valuable green spaces within the town. At present, there are 32 areas of open space such as parks and nature conservation areas including 26 Playing fields; more than 70 children's play areas and 19 Allotment sites. There are currently 1.76 ha of park and garden space per 1000 population in Crawley, which is comparatively high for an English town. These spaces have a dual role: being fundamentally important to the structure of the town, and should play an ecological role for the movement of wildlife; mitigating the impact of climate change and helping to alleviate the risk of flooding. These spaces are increasingly coming under pressure for infill development. Their piecemeal loss would fundamentally change the appearance of the neighbourhoods and potentially remove the best elements of the urban landscape that the original master planning sought to preserve.
- E7 Generally, the residents of Crawley are satisfied with the current levels of open space and recreation facilities available. It has been noted that parks and gardens are of particular importance to local residents for both recreational and aesthetic importance, and it is therefore vital to maintain and improve the quality of parks and gardens to preserve the quality of life of residents and visitors. Due to the urban nature of Crawley, Worth Way is the only 'green corridor' in the borough. Residents have noted that provision for teenagers is poor, as open spaces have little equipment suitable for older children.
- E8 In summary, Crawley has very good quantity and quality of green and open space within the town, which is valued extremely highly by local residents. It is important that the current provision is retained, and the quality improved in some instances (such as

to provide a better connected green infrastructure network, and adding facilities for older children). These spaces and facilities are likely to come under increasing pressure from development and the growing and changing needs of the population as highlighted in Topic Area C – Housing and Topic Area B – Heritage, Character, Design and Architecture.

Likely evolution without the continued implementation of the Local Plan

E9 It is difficult to predict what the impact might be without the continued implementation of the Local Plan. The council has existing policies that provide some degree of protection to these areas and it is possible that in trying to meet housing requirements, the Local Plan may have to consider developing some of these sites. Without continuation of the Local Plan it is likely that the council will have less control over which sites are protected, leading to loss of areas of open space/biodiversity that are more valued than other more suitable sites.

What the Local Plan can and cannot do

E10 Through appropriate identification and designation, the areas of the town with high ecological and biodiversity value can be protected to a high degree. Trees, on their own or in groups, can be protected by Tree Preservation Orders if considered to make a particularly important contribution, especially if they are perceived to be under threat. However, securing funding for the management and improvement of these areas is largely outside the remit of the Local Plan.

E11 Open space and structural landscaping policies have the potential to protect these spaces, unless exceptional circumstances exist. Currently policy exists to achieve this, but their effectiveness is an issue that will be reviewed through the LDF to see if more can be done. The potential for a new designation proposed in the NPPF: a Local Green Space, will be explored with residents.

E12 The council has limited influence on the growth of the population and the pressures it places on the provisions of open space and recreational facilities. Policy can aim to preserve existing routes to the countryside and ensure that existing levels of recreational provision are maintained in a qualitative sense only, because new provision within the borough’s boundaries is unlikely other than when it is provided as part of large developments.

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
E1	Amount and type of development within areas designated for their nature importance	None in 2010/11			CBC Sussex Biodiversity Record Centre
E2	Amount of trees with Tree Preservation Orders lost per annum	12 TPO applications were granted for felling of trees in 2010/11, a total of 15 trees			CBC
E3	Amount and type of open space, sport and	Not currently monitored however, future data will serve as			CBC

	recreational spaces lost/gained per annum	baseline			
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Issue: Development in the Borough will impact on biodiversity, fauna, flora and soil

E13 In the future, it is possible that climatic factors could affect the ecological and landscape resources of the borough. There is already clear evidence to show that climate change has resulted in effects to flora and fauna including changes in populations, ranges, migration patterns and seasonal and reproductive behaviour of certain species. Such effects are likely to become more apparent and extensive as the climate continues to change.

E14 There are sections of the borough that are used for agricultural purposes. The Agricultural Land Classification (ALC) maps for West Sussex indicate that the agricultural land within Crawley is a mixture of Grades 3 and 4 (on a scale of 1-5 where 1 is the best and most versatile land, and Grade 5 land is 'very poor').

E15 There are five main types of soil found across the borough. The majority of the borough lies on two main types of soil: 'slightly acid loams and clays with impeded drainage' and 'slow, permeable and seasonally wet, basic loams and clays'. The remaining soil types are 'naturally wet, loamy soils', which are found in the North East Sector and stretching across Furnace Green, Maidenbower and Worth; a small patch of 'Naturally wet, loamy and clayey floodplain soils' along the River Mole and the very southern extremity of the borough lies on 'Freely draining, slightly acid loamy soils'. This prevalence of relatively poor-draining soil has implications for flood risk discussed in Topic Area A.

E16 Increased development pressures in and on the fringes of the borough could reduce the quantity of these natural resources and their quality in adjoining areas. Insensitive design and execution of development could result in unacceptable losses of valuable resources and increased pollution from water run-off from built up areas. The existing structure of the town has retained the potential for biodiversity and green networks, and mitigates the urban heat island effect to some extent, but this could be lost with increased development on existing open spaces, to the detriment of human quality of life, and impacting the quality of biodiversity in the town.

Likely evolution without the continued implementation of the Local Plan

E17 Whilst national efforts at tackling issues such as climate change might lead to an improvement over the short to medium term, it is likely that the effects could be significant in the long term. Unplanned urban development could accelerate adverse impacts on biodiversity and the loss of soil.

What the Local Plan can and cannot do

E18 In the absence of the Local Plan, which can set policies on climate change mitigation and adaptation, it is likely that the effects outlined above would become more pronounced. Policies specific to issues such as construction practices, Greenways and trees, are likely to help in the preservation of these environmental resources. The impact that new developments will have on climate change can also be reduced through appropriate national and locally specific policies aimed at reducing CO₂ emissions etc.

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
E4	Change in areas of biodiversity importance	Total area of open space and natural habitats = 500 hectares (12.9%). 2010/11 – no direct loss of sites designated for their biodiversity importance.		Data provided by the Sussex Biodiversity Record Centre suggests that no planning applications during 2009/10 that have infringed on designated and habitat areas.	CLG Core Output Indicator E2: Environmental Quality
E5	Improved Local Biodiversity – proportion of Local Sites where positive conservation management has been or is being implemented - District (CBC)	58% in 2009/10	All England top quartile 44%	CBC has 12 SNCI sites and of these 6 have been actively managed over the past 5 years. 3 of the sites are privately owned and as such CBC have no control over the management of these sites.	NI 197

Sustainability Appraisal Objectives

Objective Six – To conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the Borough.

Topic Area F – Transport and Infrastructure

Including: roads, rail, public transport, Gatwick, water, sewerage

Introduction

F1 Crawley's position at the geographical heart of the Gatwick Diamond economic area combined with excellent transport links including the London-to-Brighton and London-to-Southampton rail links, Gatwick Airport and the M23 motorway, has meant that Crawley is an attractive business location. As a result, there are more jobs than the working age population of the borough, and businesses within the town draw their workforce from the wider area. Hence, both the inter- and intra-transportation network are of particular importance to the town. Crawley's role within the Gatwick Diamond means that significant new growth is anticipated in and around the borough. A thorough consideration of the strategic infrastructure network is required to ensure that development does not outstrip essential infrastructure, such as sewerage and water (See Topic A). The transportation considerations for the borough's development are outlined in further detail below.

Relevant Plans, Policies and Programmes

F2 For the purposes of this draft SA Report, only the key plans relating to this Topic Area are introduced. The list provided is not meant to be exhaustive but to indicate the plans with the most relevance. The relevant plans for this Topic Area are:

General

- A Sustainable Community Strategy for Crawley 2008 – 2026 (CBC, 2008)
- South East Plan (GOSE, 2009)
- National Planning Policy Framework (CLG, 2012)

Infrastructure

- National Planning Policy Framework (CLG, 2012)
- Community Infrastructure Levy: An Overview (CLG, May 2011)
- Community Infrastructure Levy Regulations (DCLG, 2010)
- Planning Obligations and S106 Agreements Supplementary Planning Document (CBC, 2008)
- Crawley Draft Infrastructure Plan (CBC, 2012)

Transport

- National Planning Policy Framework (CLG, 2012)
- Local Transport White Paper: Creating Growth, Cutting Carbon (DfT, 2011)
- The Department for Transport's Draft Guidance to Regions on Delivering a Sustainable Transport System (DaSTS, 2008)
- Mapping the Region's Transport Challenges (SEERA, 2009)
- West Sussex Local Transport Plan (LTP3) 2011 – 2026 (WSCC, 2011)
- The Crawley Area Transport Plan (WSCC, 2004)
- Draft Crawley Transport Statement (CBC, 2011)
- Rail Utilisation Strategies – London and the South East (Network Rail, 2011)

Gatwick

- Gatwick Master Plan (GAL, 2011)
- Draft Aviation Policy Framework (DfT, 2012)
- Gatwick Airport Transport Strategy (2007 – 2012)
- Control of Development in Airport Public Safety Zones (Circular 01/2010)
- Revised Public Safety Zones at Gatwick Airport (CAA, 2011)

Issue: The growth of the town will increase pressures on transport infrastructure that is already approaching capacity

F3 The strategic roads serving Crawley include the Trunk Road network comprising of the M23/A23 London to Brighton corridor, as well as four key A roads: the A264 Crawley Road, the A2220 Horsham Road, the A2011 and the A23 Crawley Avenue / London Road. Crawley has the highest figures for net commuting in the South East Region and during peak hours there are approximately 35,000 vehicle movements within Crawley. Of these vehicle movements, it is estimated that nearly 1 in 5 cars on Crawley's roads are taking children to school. In fact, 58% of total car trips are less than 5 miles and 25% are less than 2 miles.

F4 Recent assessments of the current performance of the road network in Crawley suggest that weekday peak period congestion is regularly experienced on key links and at key junctions. Key congestion points are as follows:

- Junction 11 of the M23 (A264/A23) Pease Pottage interchange
- Junction 10 of the M23 (A264) Copthorne interchange
- The junction of the A264 and the A2220
- Junctions between the A23 and the A2220, Gossops Drive, and Ifield Avenue
- Most of the links on the A23

There are already a number of committed developments that will create additional travel demand in the future and the pressure will only be increased by any additional development proposed in the Local Plan. The HA has undertaken a study that has shown that in order to accommodate future growth including traffic from all planned development as set out in the South East Plan within the Gatwick Sub-region, all junctions on the M23 at Crawley with the exception of junction 10a, will need to be improved.

F5 In addition to the convergence of the strategic road network at Crawley, two railway lines serve Crawley: the London-Brighton railway, and the Arun Valley railway which branches off the London-Brighton line at Three Bridges and serves Horsham, Arundel and the south coast between Bognor Regis, Portsmouth and Southampton Central. There are currently four railway stations in Crawley:

- Gatwick Airport – located on the London-Brighton line;
- Three Bridges – located on the London-Brighton line;
- Crawley – located on the Arun Valley Line; and
- Ifield – located on the Arun Valley Line.

All four stations have seen an increase in passenger usage over the past three years and Gatwick Airport Station is now the 23rd busiest station in the UK in terms of passenger usage.

F6 In addition, the developers of the Strategic Housing Location to the West of Bewbush have been in discussions with Network Rail regarding the possibility of a new station within that development. Policy WB 24 in the West of Bewbush Joint Area Action Plan (July 2009) safeguards land for a railway station, pending a definitive decision by Network Rail. It is the position of Network Rail that any further development that would increase demand at Ifield station should consider the need to provide improvements to the station platforms, and disabled access.

F7 There is a well established and growing bus passenger market in Crawley. Crawley is well served by conventional bus services and the Fastway high quality bus network. Fastway is a network of premium bus services combining high quality vehicles, passenger facilities, real time information, high frequency and 24/7 services, bus priority and kerb-guidance busway. The system was commissioned in 2003 with new routes added in 2005, and is the outcome of a joint venture between BAA, Metrobus,

West Sussex County Council, Crawley Borough Council, Reigate & Banstead Borough Council, Surrey County Council and British Airways.

- F8 The patronage of Fastway, which operates three routes, has grown steadily since it opened and is currently attracting approximately 9,000 passengers daily. The percentage of commuters using buses to travel to work is significantly higher in Crawley in comparison to the rest of the South East Region, although it still represents a relatively small proportion of the total figure.
- F9 There are some 20km of cycle paths in Crawley including The Downs and Weald cycle route of the National Cycle Network. Further extensions are planned.

Issue : The Growth of the Gatwick Airport will put pressure on existing infrastructure and the environment

- F10 Gatwick Airport currently sees an annual throughput of around 32 million passengers. It is estimated that within its current two terminal, one runway configuration it can cater for up to 45 mppa. The growth of the airport can generate pressures on infrastructure such as transport links as well as the demand for power and water and waste disposal; and have environmental impacts on air quality, noise and water quality and climate change issues (see Topic A). A Section 106 agreement signed in 2008 by Gatwick Airport Limited, CBC and WSCC contains a wide range of obligations which seek to mitigate the environmental effect of growth at the airport through a range of activities and requirements. Current government policy also requires the Core Strategy to safeguard land for a second runway at Gatwick, although a review of national aviation policy is being undertaken and the Local Plan will be updated accordingly.
- F11 Gatwick Airport set itself the objective that 40% of its passengers should be using public transport to access the airport by the time the airport's annual throughput reaches 40 million (currently estimated in 2015), up from the 2006 figure of 35.3%. CAA modal share information indicates that this 40% target was reached in 2010, although passenger throughput is currently around 32 mppa. Despite this target, most airport users are still using private vehicles to access the site. The expansion of the airport, possibly as a two runway operation, in combination with the delivery of new employment and housing is likely to place greater strains on the transport infrastructure within Crawley and surrounding Local Authorities.

Likely evolution without the continued implementation of the Local Plan

- F12 The Local Plan does not currently have a strategic vision for the borough's transport system and therefore, whilst small improvements could continue to be made, the transport infrastructure would struggle to cope over the long-term, especially in light of the level of proposed development, and the historic trend for in-commuting from areas beyond the borough boundary.
- F13 The Local Plan provides a local policy context for the development of Gatwick and helps ensure that development at the airport is airport-related and its environmental impact is managed. Without the Local Plan there could be greater demand for development at the airport and the management of its environmental impact would be more limited.

What the Local Plan can and cannot do

- F14 A priority for the Local Plan is to create a safe and efficient transport network that can support the town's continued growth. Policies in the Local Plan can limit development that adversely impacts upon the network unless appropriate mitigation is provided. However, providing new infrastructure has a limited mitigating effect on congestion. There is a need to try and discourage unsustainable forms of transport and encourage

more sustainable modes, such as walking, cycling and public transport. The Local Plan can influence this to a certain extent for example through car parking standards, bus priority measures, or creating public transport interchanges – although, there are other methods that are beyond the planning process (e.g. congestion charging, public transport incentives etc.). The identification of a transport strategy for the town will form an important part of the proposals to mitigate the impact of new development on Crawley’s residents and local environment.

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
F1	Congestion – Average journey time per mile during the morning peak				NI 167
F2	Access to services and facilities by public transport, walking and cycling	2010 Accession mapping indicates Crawley has good access to services via public transport. See Maps at Appendix C			NI 175
F3	Working age people with access to employment by public transport (and other specified modes)	2010 Accession mapping indicates Crawley has good access to services via public transport. See Maps at Appendix C	West Sussex – 81% (2008)		NI 176
F4	Local bus and light rail passenger journeys originated in the authority area	TBC	West Sussex - 23642979 (2008/09)		NI 177
F5	Children travelling to school – mode of transport usually used	January 2011 Bus (type not known) – 3.3% Public Service Bus – 4.8% Car – 19.7% Car Share – 6.6% Cycle – 2.7% Dedicated school bus –	(2008/09) WSCC 5-10 Years: Car- 35.6% Car Share – 6.3% Public transport – 2.3% Walking – 53.8% Cycling – 1.7% Other – 0.3%	Data for Crawley indicates a higher proportion of sustainable travel than in 2010. Fewer pupils are cycling to school, but	NI 198 West Sussex County Council – Jan 2011 School Census

		2.5% Train – 0.1% Taxi – 0.6% Walk – 59.4%	11-16 Years: Car- 16.8% Car Share – 3.5% Public transport – 27.7% Walking – 43.5% Cycling – 7.9% Other – 0.5%	proportions of walking, bus and car-share journeys are higher.	
F6	Number of passengers using Gatwick Airport per annum (and percentage arriving by public transport)	2011 (Q1 and Q2 only): 13.9m (44.3%) 2010: 28.4m (40.4%) 2009: 29.0m (37.5%)		Passenger numbers are predicted to increase to reach 40 million passengers per annum in 2018. The percentage of international air passengers at Gatwick has grown faster than that for domestic passengers. Numbers fell in 2010 but indications are that 2011 will show an increase. SAAP target for 40% public transport access was met in 2010.	CBC
F7	People killed or seriously injured (Number of casualties in Crawley)	2010/11 38 2009/10 44 2008/09 34 2007/08 41 2006/07 40		There is no distinct trend in Crawley. There are an average 0.4 KSI per 1000 of the population over the last 5 financial years	

Issue: The rate of development, particularly residential, requires careful management to ensure that it does not outstrip the Borough's infrastructure

F15 Discussions with key utility infrastructure providers have indicated that the infrastructure should be in place to support the borough's continued growth within currently planned limits, (with the exception of the trunk road network which would suffer severe impacts from development that increases demand on junctions currently at capacity, as discussed above). New residential development needs to be carefully managed, with a consistent rate of delivery, to ensure that the appropriate

infrastructure is delivered in tandem. This is particularly an issue for the water and sewerage providers because current funding regimes only operate over five year periods; therefore it is difficult to guarantee capacity being available over longer periods.

Likely evolution without the continued implementation of the Local Plan

- F16 Without the continued implementation of the Local Plan, the borough's infrastructure would struggle to keep pace with the town's development because although the town has an adopted Infrastructure and S106 Agreements SPD it would not be able to provide for specific items of infrastructure needed in certain locations.

What the Local Plan can and cannot do

- F17 Through monitoring and specific policies, the Local Plan can help to restrain the rate of development in the town, subject to the availability of infrastructure as indicated by the relevant service providers. Further infrastructure provision can be secured through Planning Obligations, S106 Agreements and the Community Infrastructure Levy to be developed by the Borough.

Sustainability Appraisal Objectives

Objective Seven – To reduce car journeys and promote sustainable and alternative methods of transport, whilst ensuring sufficient transport infrastructure is delivered to meet the requirements of the Borough.

Objective Eight – To ensure the provision of sufficient infrastructure to meet the requirements of the Borough.

Topic Area G - Population, Community Facilities, Crime and Health of the Community

Including: demographics, educational establishments, open space, sport and recreation provision

SEA Directive – Population, Human Health

Introduction

G1 Understanding any changes or growth in the population of the borough is fundamental in providing sufficient and appropriate community facilities. Crawley is a compact town with a population of around 105,000. The ethnicity of the borough is diverse and the demographic structure is one dominated by a young adult population with children. Those people who first moved to the area back in the 1950's are now growing older and although they do not represent the majority in terms of population structure their needs are perhaps greater. Even across the young adult population there are variations in the types of people living in the town with a mix of young families, singles who have moved into the area looking for executive style living, and those who have lived in the area for some time, who perhaps do not have the means to buy their own home and are dependent on the state for support. Inevitably the different people living in the town have different issues regarding their social, health and environmental well being and it is therefore important not to focus too much on Crawley as one town but rather a series of different areas, groups and types of people with very different needs, wants and aspirations. This is reflected in the indices of multiple deprivation where there are notable differences between the east and the west of the borough.

Relevant Plans and Policies

G2 For the purposes of this draft SA Report, only the key plans relating to this Topic Area are introduced. The list provided is not meant to be exhaustive but to indicate the plans with the most relevance. The relevant plans for this Topic Area are:

- National Planning Policy Framework (CLG, 2012)
- A Sustainable Community Strategy for Crawley 2008 – 2026 (CBC, 2008)
- National Community Safety Plan 2008-2011
- PPG 17 Assessment, Open Space Sport and Recreation Study (PMP 2008)

Issue: The changing population demographics are creating a mismatch between the need for housing and community facilities and current provision.

G3 Mid-year estimates in 2009 recorded the population of Crawley as 105,333 and it is projected that there will be a 7.8% increase by 2016. This trend is expected to continue and as supported by the Strategic Housing Market Assessment, the need for increased housing delivery in terms of total provision and to meet type and tenure demand will increase. The challenge will be to try to meet the needs of the currently young population (the largest age group being between 30 and 40) whilst providing more assisted living and bungalow housing options for the predicted increase in over 65s. Meeting these broad needs for housing is challenging for the authority, yet crucial to achieving a strong, cohesive and successful community. The housing issue is discussed further in Topic Area C.

G4 The mid-year estimates indicate that 18% of the resident population is under 15 years of age (compared to 20% for England and Wales), 63% is between 15 and 59 (compared to 59% in England and Wales) and 18% is aged 60 and over (compared to 21% in England and Wales). This shows that Crawley has a population profile broadly in line with the national average with a slightly above average working age population.

G5 In light of this position, the provision of appropriate community infrastructure designed to meet the needs of changing demographics in the town will be important in maintaining the quality of life for residents. Whilst this is an area where further

clarification is being sought as part of the development of the Local Plan, one issue already known is the need for new cemetery provision. Currently, the supply of land for Christian burials is expected to run out in 2015 and as with all land intensive development requirements in the town, new provision remains challenging. Due to the contribution that these sorts of facilities make to the community, provision of new community infrastructure and facilities will be continue to be a high profile issue to be explored and resolved.

Likely evolution without the continued implementation of the Local Plan

G6 The problem of insufficient facilities to meet community needs is likely to become more acute if the Local Plan is not updated to plan for changing demographic trends. It is likely that essential infrastructure, such as the new cemetery identified as a need within the next four years, would be delivered without the Local Plan.

What the Local Plan can and cannot do

G7 The council can have no direct influence over the way in which the population of Crawley grows and changes but through Policy can to some degree seek to meet needs of the changing population through the location and type of housing, jobs and community facilities. The council can also seek funding for facilities through S106 and ultimately the Community Infrastructure Levy, and plan for their implementation during the Plan period.

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
G1	Satisfaction of people over 65 with their home	76.1% (2008-09)	SE - 85.5% England 83.9% (2008-09)	Whilst the percentage is lower than the regional and national result it does represent a significant increase from the 53% result of the 2006/07 People in Pound Hill South and Three Bridges were more inclined to express satisfaction with their home while those living in Northgate and Bewbush expressed greater levels of dissatisfaction. Younger people were also more inclined to be dissatisfied with their home.	NI 138 2008/09 Place Survey
G2	Percentage who think that older people in their local area get the help and support they need to continue to live at home for	29.7%	SE 28.4% England 30%	People in Three Bridges were more likely to agree with this question while those living in Broadfield South were more likely to disagree. People renting their home from the Council were more positive about the support older people receive than those renting their home from a private landlord or	NI 139 2008/09 Place Survey

	as long as they want to			those buying their property using a mortgage.	
G3	Overall satisfaction with local area	74.9%	England 78.16%	Significant increase from the 06/07 result of 53% People living in Maidenbower, Southgate and Three Bridges tended to be more positive while those living in Bewbush and Broadfield were more inclined to be less satisfied. Younger people were more likely to be less satisfied	NI 5 2008/09 Place Survey

Issue: The ethnic structure of the population of Crawley is notably diverse in comparison to the national average resulting in specific development demands

G8 Crawley has a larger ethnic minority population than the national average and the average for the South East. The largest minority groups are Asian/Asian British: Indians who represent 4.40% of the population of the Borough; and Pakistani who represent 3.00%. This is in comparison with 2.09% and 1.44% respectively of the national population. Electoral Roll Data recorded 61 different nationalities from the EU and Commonwealth countries alone also highlighting the enormous diversity in Crawley's population. With a wide ranging ethnic structure in Crawley, there needs to be a variety of community facilities (such as places of worship etc) and services to meet specific needs and encourage community cohesion.

Likely evolution without the continued implementation of the Local Plan

G9 Existing policies and the objectives of the Sustainable Communities Strategy do plan for the provision of community facilities, such as places of worship, therefore, it is not envisaged that it would be a significant issue if it was not possible to update the Local Plan.

What the Local Plan can and cannot do

G10 The Local Plan can work to deliver a range of facilities and services that are accessible to all and to the correct standards.

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
G4	Percentage of people who believe people from different backgrounds get on well together in their local area - Place Survey/LAA2	73.1%	West Sussex County - 80% All England - 81.62%	Crawley's figure is slightly lower than the England and West Sussex figures but there is a slight improvement made from the 06/07 figure of 70% There is variance across the town with people from Northgate and Southgate more likely to agree with the statement while those from Broadfield and Bewbush were less likely to agree.	NI 1 2008/09 Place Survey

G5	Percentage of people who feel that they belong to their neighbourhood - Place Survey	53.5%	West Sussex County - 61.7% All England - 63.7%	Further work is needed to improve the feeling of belonging to a neighbourhood within Crawley People living in Tilgate are more likely to feel a sense of belonging to their neighbourhood while those living in Bewbush and Broadfield are more likely to have less attachment.	NI 2 200809 Place Survey
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Issue: Crawley has a high proportion of young children, particularly under 4's, compared with other West Sussex districts but early years provision in the Borough is poor. Those leaving education are not able to participate fully in the local economy.

G11 Crawley is relatively poorly served with 'early years' provision for under 5s with the lowest proportion of childminding places in the county and the second lowest proportion of places in early education and childcare.

G12 There are 26 primary schools catering for the needs of Crawley's children aged between 4 and 11 years. Crawley also has six secondary schools: Hazelwick, Holy Trinity CE Secondary, Oriel High, Ifield Community College, St Wilfrid's and Thomas Bennett Community College – providing education to children aged between 11 and 16 and to A-Level standard for 16-18 year olds. The Central Sussex College has a large campus in the town and offers a wide range of professional qualifications and courses. Furthermore, the efforts are underway to establish a university presence in the town.

G13 Educational attainment within the borough tends to be lower at all age groups when compared to the South East averages. In 2008/09 63% of boys and 69% of girls living in Crawley achieved five A*-C grades at GCSE or equivalent. This compares with 66% and 74% respectively in the South East region as a whole. Similarly, the attainment rates for those between the ages of 16 and 18 years are up to 7% lower than South East and UK averages, although this gap reduces significantly for those over the age of 19. Compared with the surrounding districts, Crawley has a higher percentage of residents with poor literacy and numeracy skills.

Likely evolution without the continued implementation of the Local Plan

G14 Although the Gatwick Diamond Local Strategic Statement refers to a University presence in Crawley, if it is not included in an updated policy within the Local Plan it is unlikely that this aim could be realised. The provision of early years and educational facilities is the responsibility of County Council, and will be identified in their emerging Infrastructure Plan.

What the Local Plan can and cannot do

G15 The council has an adopted SPD that includes contributions towards education facilities, and intends to adopt a Community Infrastructure Levy charging schedule by April 2014, and so contributions could continue to be secured for the town's educational facilities. There is a need to ensure equality in access to education and to ensure that overall levels of education and skills match local employer's needs. Where necessary, the Local Plan can help support the education infrastructure improvements required to deliver high quality facilities, potentially through a university campus for example, but that does not necessarily translate in to driving up local educational attainment.

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
G6	Participation of 17 year-olds in education or training	3.8% Not in Education, Employment or Training in Crawley (2011)	England 2006 Full time education 64.9%	NEET figures indicate that while 3.8% of the relevant population in Crawley are not in education, employment or training this rises to 7.5% in Broadfield South	NI 91
G7	Percentage of people aged 16 – 74 with no qualifications.	25.44%	SE – 23.92% England – 28.85%	Within the SE, Crawley has a higher proportion with no qualifications	2001 Census

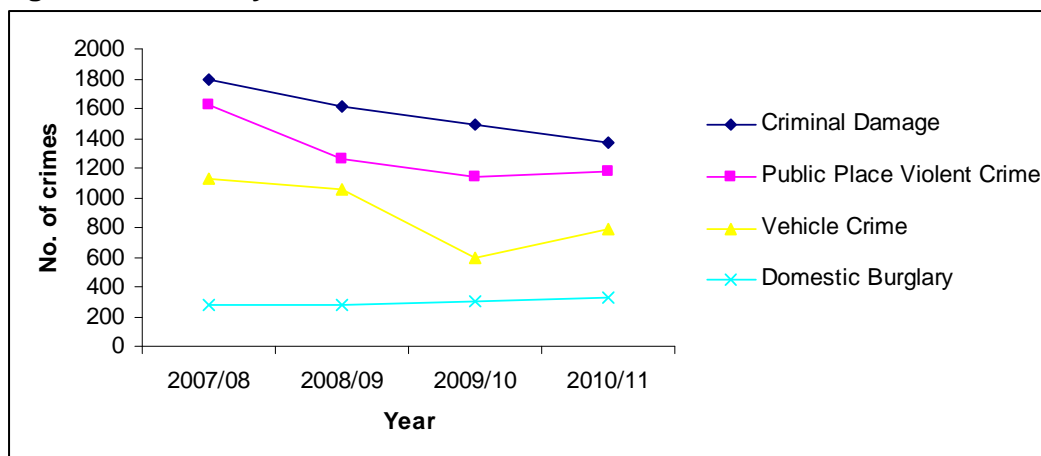
Issue: There is a need to reduce crime and the perception of crime

G16 Recorded crime in the borough decreased by nearly 18% from 14,677 to 12,083 between 2005 and 2008, and an additional 22% between 2008 and 2011 to 9410 which equates to around 26 crimes a day. Of the recorded crimes in 2008, 17% (1,600) occurred at Gatwick.

Table G1: Crawley Crime incidence 2008-2011

Crawley and Gatwick Airport	2007/2008	2008/2009	2009/2010	2010/2011	Actual difference	Three year % change
Total Crime	12,083	11,155	10,035	9,410	-2,673	-22.1%
Domestic Burglary	276	283	307	326	+50	+18.1%
Vehicle Crime	1,128	1,059	591	787	-341	-30.2%
Criminal Damage	1,790	1,608	1,492	1,372	-418	-23.3%
Public Place Violent Crime	1,619	1,264	1,142	1,174	-445	-27.5%
Business Crime	4,310	4,234	3,895	3,460	-850	-19.7%

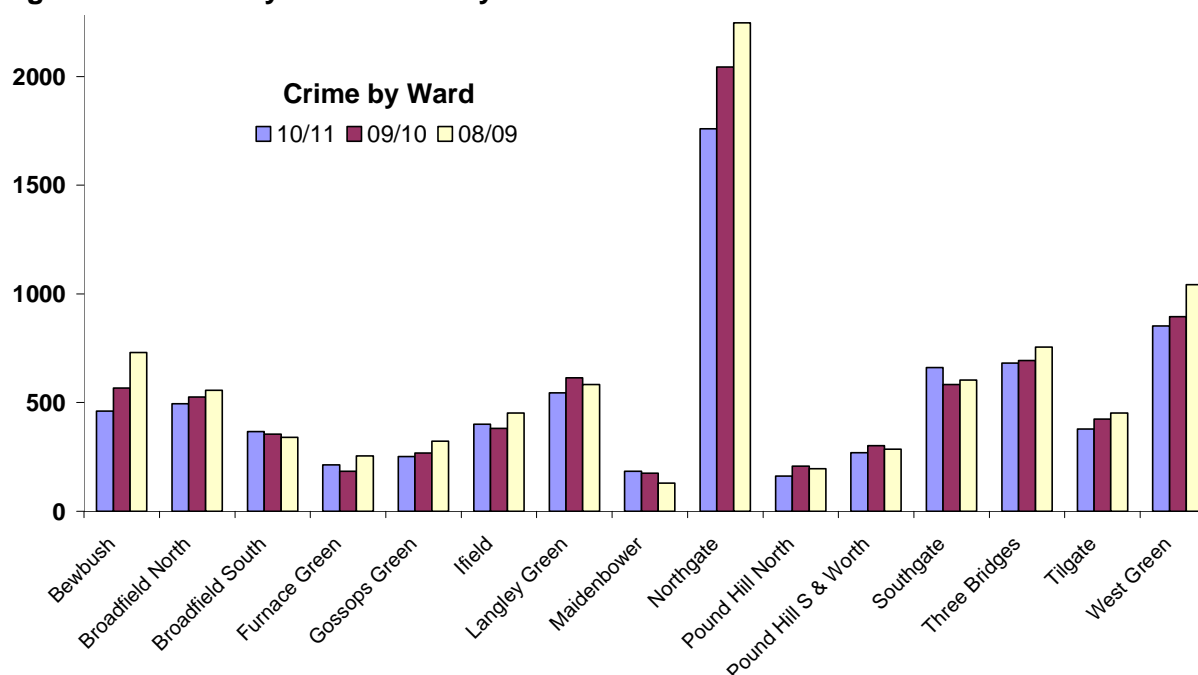
Figure G1: Crawley crime incidence 2008-2011



G17 Crime patterns and fear of crime vary across Crawley and have different impacts on quality of life and development. Much crime goes unreported, particularly that related to minor physical violence. Sexual assault and levels of domestic violence, although small in total, are much higher in the Crawley area compared to the rest of West Sussex. Levels in Broadfield North are much higher than Crawley as a whole. The economic and social cost of crime is high and vulnerability to crime varies for different people and in different places. A significant amount of crime, disorder and anti-social behaviour is drug and alcohol related. Anti-social behaviour is a source of much public anxiety and concern although the fear of crime is generally disproportionate to actual incidence. Whilst, the crime rate within Crawley is falling the perception of crime as evidenced in the Place Survey results is generally high - especially the perception of safety after dark.

G18 By ward, Northgate suffered more than twice the number of crimes than any other area with 1,760 offences or 23% of the total. Northgate ward comprises the town centre with its numerous pubs, clubs and bars, and includes the police station. Offences are often revealed at the police station, e.g. people in possession of drugs, and for recording purposes the station is shown as the place where the offence was committed. This can therefore give a false impression of the volume of crime in Northgate ward.

Figure G2: Crime by ward. Crawley 2008-2011



Likely evolution without the continued implementation of the Local Plan

G19 There are existing provisions in place relating to Secured by Design and therefore it is unlikely that the continued implementation of the Local Plan will have a significant impact.

What the Local Plan can and cannot do

G20 The Local Plan can ensure that the principles of Secured by Design are followed in all new developments. This includes standards for fences, gates and alarms, as well as guidance on the layout and design of developments. However, direct action in actually policing and reducing crime is outside of the scope of the planning process.

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
G8	The percentage of Crawley's residents who would agree with the statement that Crawley is a safe place.	35%	N/A	The most recent survey results illustrate a increase in residents opinion up from 27% from the previous survey in 2005/06	CBC Resident's Survey 2008
G9	The percentage of people who feel (to a major extent) that the design of the built environment creates safe environments.	37%	N/A		CBC Resident's Survey 2008
G10	The percentage of people who feel (to a major extent) that well maintained environment creates safe environments.	41%	N/A		CBC Resident's Survey 2008
G11	How safe or unsafe do you feel when outside in your local area: % people who feel very safe or fairly safe	After dark – 40.7% During Day - 86.2%	SE- After dark - 54% During Day 90.4% England- After dark– 50.9% During Day 87.9%	People living in Bewbush and Broadfield will generally feel less safe.	Place Survey 2008
G12	Serious violet crime rate (number per 1,000 population)	0.3 (2008/09)	West Sussex 0.3 All England Average 0.93	There has been a increase in the rate when comparing the first three quarters of 2008/09 to 2009/10 (0.19 increase to 0.55)	NI 15 Home Office – iQuanta No longer collected by Crawley Borough Council
G13	Serious acquisitive crime rate (number per 1,000 population)	14.56 (2008/09)	West Sussex 8 All England Average 18.83	There has been a decrease in the rate when comparing the first three quarters of 2008/09 to 2009/10 (11.45 decrease to 7.64)	NI 16 Home Office – iQuanta No longer collected by Crawley Borough Council
G14	Assault with injury crime rate (number per 1,000 population)	6.92 (2008/09)	West Sussex 4	There has been a decrease in the rate when comparing the first	NI 20 Home Office – iQuanta

			All England Average 7.69	three quarters of 2008/09 to 2009/10 (5.23 decrease to 5.02)	
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Issue: Ensuring better health and healthcare for Crawley

G21 The health of town is generally good. For example, life expectancy at birth in Crawley is on average 80 years for men and 84 years for women, which is slightly higher than the national average (2008 data). There are however, wide variations between different wards - life expectancy at birth for males in Bewbush is 75.7 years compared to 82.7 years in Pound Hill North. The provision of healthcare facilities is addressed in the discussion under Topic F. There is a need for the council to continue to lead and work with others to protect and promote the health and wellbeing of the community through creating opportunities to participate in exercise and helping to provide sufficient healthcare provision to support the borough's continued growth.

G22 Open space, sport and recreation provision in the town is shown through Crawley's Open Space, Sport and Recreation Study to be of generally good quality and quantity. There is however an undersupply of 4 badminton courts, 10 tennis courts and 112m² of swimming pools to meet the needs of the existing population. This is not considered to be a significant issue due to the quality of the Towns provision, notably K2 Leisure Centre which offers a broad range of facilities including an Olympic sized swimming pool and climbing wall.

G23 Physical activity levels for the area are generally lower than the national picture although satisfaction with leisure facilities are very high. There are however local quality issues and in some areas the location of facilities doesn't match local needs, so an element of refinement is now required to ensure the assets are fit for the life of the plan. A review of outdoor sports facilities (such as playing fields and sports pitches) is underway and the SA Report will update the situation with any available updates to baseline data. This is an important issue for the borough for a second reason: A definitive list of protected sites as well as those that can be used for alternative uses will provide a strong policy to ensure Crawley has the right type and amount of open space, sports and recreation provision in the most accessible locations.

Likely evolution without the continued implementation of the Local Plan

G24 The population of the borough is likely to continue to grow and age putting an increasing strain on healthcare provision. Existing disparities around the town are likely to be widened. Without intervention the levels of sports and open space provision are likely to erode slightly and areas of the town experiencing the greatest levels of change may be underserved. By intervening now, the distribution and quality issues can be addressed to meet current and future need.

What the Local Plan can and cannot do

G25 The quality of the environment has an important role to play in the health of the local population (and to a lesser extent those who work in the borough) in facilitating and encouraging exercise. The quality of community services, health and recreation facilities, contributes to the level of deprivation suffered in an area. By ensuring equality in access to these facilities, the council may be able to contribute to the improvement of the quality of life for residents and visitors. The Local Plan can influence strongly the location of provision, the demands on new development and future protection of provision. Ensuring that facilities are in accessible locations and of high quality goes some way to encouraging greater participation in sport.

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
G15	Self reported measure of people's overall health and wellbeing	78.7% in good health	England Average – 76.63% WSC – 80.1%		NI 119
G16	All-age all cause mortality rate	2008-09 Females 451 Males 540	England: 2008/09 Females 480 Males 669	Crawley saw a rise in female mortality from 382 in 2007/08 to 451 but a fall in the male mortality from 580 in 2007/08 to 540.	NI 120 (a-Females & b-Males)
G17	Healthy life expectancy at age 65 (years)	2001 Females 14.8 Males 14.5	South East 2001 Females 15.8 Males 13.7 England 2001 Females 14.5 Males 12.5		NI 137 2001 Census Office of National Statistics
G18	Adult Participation in Sport	2009-11 – 17.3% 2008-10 – 17.9% 2007-09 – 17.0% 2005/06 – 19.6%	Regional Average – 2009-11 – 23.1% 2007-09 – 23.1% 2005/06 – 22.9% National Average – 2009-11 – 22.3% 2007-09 - 22.1% 2005/06 – 21.6%	This represents a reduction in participation from the result of the first survey carried out in 2005/06 which was 19.6% but an improvement from 2007/08. Crawley has the lowest level of participation in West Sussex, and lower than the Regional and National averages.	NI 8 Active People Survey by Sport England
G19	Amount and type of open space, sport and recreational spaces lost/gained per annum	Data to be provided from evidence base			

G21	Percentage of residents satisfied with the authorities sports/leisure facilities	85%		Increase from 07/08 result of 68%	Place Survey 2008
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Sustainability Appraisal Objective

Objective Nine – To promote healthy, active, cohesive and socially sustainable communities.

Objective Ten – To ensure everyone has the opportunity to participate in sport and to encourage active lifestyles.

APPENDIX D : PREFERRED POLICIES AND OPTIONS APPRAISAL

Each of the Local Plan preferred strategy policies and their options have been assessed against the Sustainability Objectives; these have been set out in the following boxes structured in Local Plan Chapter order.

Character			
Policy CH1: Neighbourhood Principle			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 1: Develop a local plan policy to protect and enhance the character of Crawley's neighbourhood structure. It is considered that by applying a holistic approach to maintaining the character of the neighbourhoods, this option best enables the protection of the key individual features that contribute to the overall function and sustainability of the neighbourhood principle.		
Option 1: Develop a local plan policy to protect and enhance the character of Crawley's neighbourhood structure.	1. minimise climate change	++	
	2. adapt to climate change	+	
	3. protect/enhance built environment	++	
	4. Decent, affordable homes	++	
	5. Maintain/support employment	+	
	6. conserve/enhance biodiversity and landscape	+	
	7. promote sustainable journeys	++	
	8. provide sufficient infrastructure	++	
	9. promote sustainable communities	++	
	10. encourage active lifestyles	++	
	<p>Commentary: The Option 1 approach would be to develop a local plan policy to protect and enhance the character of Crawley's neighbourhood structure.</p> <p>Crawley's unique character has been shaped by the neighbourhood principle, and the strong support for the principle expressed by respondents to the local plan Issues and Options consultation illustrates the value in which it is held locally. The benefits of the neighbourhood principle do not however relate solely to character, and in providing accessible housing, employment, infrastructure, facilities and services to support the day-to-day needs of residents, the neighbourhood principle reflects the key indicators of sustainable development. In this regard, Option 1 scores strongly against each of the sustainability indicators, and is brought forward as the preferred approach.</p>		
Option 2: Rely on existing national guidance and other local plan policies to ensure that development respects Crawley's neighbourhood character.	1. minimise climate change	+	
	2. adapt to climate change	+	
	3. protect/enhance built environment	-	
	4. Decent, affordable homes	+	
	5. Maintain/support employment	-?	
	6. conserve/enhance biodiversity and landscape	-?	
	7. promote sustainable journeys	?	
	8. provide sufficient infrastructure	-	
	9. promote sustainable communities	?	
	10. encourage active lifestyles	?	
	<p>Commentary: The Option 2 approach would rely on existing national guidance and other local plan policies to ensure that development respects Crawley's neighbourhood character.</p> <p>It is feasible that reliance on existing national guidance and emerging local plan policy could deliver the key components that contribute to the character and function of Crawley's neighbourhoods. However, a key concern is that the approach fails to view the neighbourhood, and the inter-linked components which contribute to its character, environment, and overall sustainability, in a holistic manner. This potentially results in a failure to consider the impact of development on the overall function of the neighbourhood, and could detract from the individual</p>		

	components (e.g. housing, open space, employment provision) that make the neighbourhoods such sustainable places. On this basis, Option 2 is not considered to represent the most sustainable way forward.
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Policy CH2: Urban Design Objectives			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 1 has been chosen to enable planning applications to be assessed against the seven principles of good urban design to protect and enhance the built environment (SA objective 3) and key landscape features (SA objective 6). The principles should also encourage walking, by creating a safer, more legible and interesting environment (SA objective 7) and socially sustainable communities (SA objective 9). Option 1 could reduce development potential by highlighting the negative impacts of over-development, or development that would not protect or enhance the borough (SA objectives 4, 5 and 7). The opposite could, however, also apply as a better quality environment may attract investment into the town.		
Option 1: Create a new policy within the Local Plan that designates seven principles of good design that applicants should adhere to.	11. minimise climate change 12. adapt to climate change 13. protect/enhance built environment 14. Decent, affordable homes 15. Maintain/support employment 16. conserve/enhance biodiversity and landscape 17. promote sustainable journeys 18. provide sufficient infrastructure 19. promote sustainable communities 20. encourage active lifestyles	+ + ++ ? ? ++ ? + + +	
	Commentary Option 1 proposes a local policy within the Local Plan which should pursue the high quality design of all new developments. Importantly, this policy will assist in both protecting and enhancing the built environment (SA Objective 3), and conserving the existing landscape (SA Objective 6). However, there might be a possibility that there will be a lack of development within the Borough, since a local policy is likely to be more restrictive with regards to the overdevelopment of a site (SA Objective 4, 5 & 7). However, an attractive and well designed development may also ensure further investment into the town.		
Option 2: Delete the existing policy and rely on the NPPF.	1. minimise climate change 2. adapt to climate change 3. protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. conserve/enhance biodiversity and landscape 7. promote sustainable journeys 8. provide sufficient infrastructure 9. promote sustainable communities 10. encourage active lifestyles	+ + + + + + + + +	
	Commentary High quality design is a specific requirement of the NPPF. The presumption in favour of sustainable development would allow development where the harm would not significantly and demonstrably outweigh the benefits (paragraph 14). The quality of development may be reduced if the need to adhere to specific principles of good urban design were to be removed.		

Policy CH3: Normal Requirements for All New Development			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 1 has been chosen to enable planning applications to be assessed against eight factors that contribute to good design to protect and enhance the built environment (SA objective 3) and key landscape features (SA objective 6). The principles should also encourage walking (SA objective 7) and socially sustainable communities (SA objective 9). Option 1 could reduce development potential by highlighting the negative impacts of over-development or development that would not protect or enhance the borough (SA objectives 4, 5 and 7).		
Option 1 Create a new policy within the Local Plan that designates eight principles of good design that applicants should adhere to.	<ol style="list-style-type: none"> 1. minimise climate change 2. adapt to climate change 3. protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. conserve/enhance biodiversity and landscape 7. promote sustainable journeys 8. provide sufficient infrastructure 9. promote sustainable communities 10. encourage active lifestyles 	<ol style="list-style-type: none"> ++ + ++ + +? + ++ + + + 	
<p>Commentary This option is intended to be judged against all planning applications, to ensure that new developments protect and/or enhance the built environment (SA Objective 3) and conserve the landscape (SA Objective 6). The principles of this policy should also maintain and even improve tree retention, which will assist in minimising climate change (SA Objective 1). In addition, the policies are intended to encourage walking (SA Objective 7 & 10) and to promote sustainable communities (SA Objective 9). However, as with the previous policy, the development potential of Crawley could be lessened with more restrictive policies (SA Objective 5) but could also encourage further investment via an improvement in the built environment.</p>			
Option 2 Delete policy and rely on NPPF	<ol style="list-style-type: none"> 1. minimise climate change 2. adapt to climate change 3. protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. conserve/enhance biodiversity and landscape 7. promote sustainable journeys 8. provide sufficient infrastructure 9. promote sustainable communities 10. encourage active lifestyles 	<ol style="list-style-type: none"> +? + +? +? + - + +? + + 	
<p>Commentary Leaving garden sizes to the market and not requiring 2 for 1 tree replacement would reduce the positive effect of tree cover in minimising climate change and in adapting to the effects. (SA objectives 1 and 2). A reduction in tree cover would have a negative impact on the character and appearance of the borough as would the inability to seek public art as part of major schemes (SA objective 3). Whilst internal space standards are applied by the HCA, a lack of external space would affect whether the home was fit for purpose and affordable homes tend to be more intensively occupied (SA objective 4). The policy could reduce development potential but a good quality environment should attract investment (SA objective 5). Fewer trees and smaller gardens would have a negative impact on biodiversity and landscape conservation/enhancement (SA objective 6). The principles should also encourage walking, by creating a safer, more legible and interesting environment (SA objective 7) and socially sustainable communities (SA objective 9). The policy could add to the cost of schemes or reduce development potential which may have an impact on what infrastructure can be provided (SA objective 8) but a significant impact on viability can be addressed through the NPPF.</p>			

Policy CH4: Structural Landscaping			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	It is clear that Option 1 is the more sustainable option since the clear identification of important structural landscaping features should ensure both the protection and/or enhancement of the landscape/built environment, (SA Objective 3 & 6) and moreover, minimise climate change (SA Objective 1 & 2). Importantly, without this policy (Option 2), then there might be insufficient protection to stop the incremental development of land that could damage such important features.		
Option 1: Create a new policy within the Local Plan that identifies areas of structural landscaping to ensure that these areas are both protected and enhanced.	1. minimise climate change 2. adapt to climate change 3. protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. conserve/enhance biodiversity and landscape 7. promote sustainable journeys 8. provide sufficient infrastructure 9. promote sustainable communities 10. encourage active lifestyles	+ + + +? +? ++ + +? + +	
	Commentary Retaining and enhancing larger areas of greenery that are important to the character, appearance and legibility of the borough would assist in minimising climate change and adapting to its effects (SA objectives 1 and 2). This approach would have a significant positive effect on the protection and enhancement of the built environment (SA objective 3) and key landscape features (SA objective 6). Identifying specific areas where improvements to existing areas of structural landscape or the creation of new areas would also have a significant positive impact. The policy should also encourage walking, socially sustainable communities and active lifestyles (SA objectives 7, 9 and 10). Option 1 could also reduce development potential by highlighting the negative impacts of over-development or development that would not protect or enhance the borough (SA objectives 4, 5 and 8).		
Option 2 Delete policy and rely on NPPF	1. minimise climate change 2. adapt to climate change 3. protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. conserve/enhance biodiversity and landscape 7. promote sustainable journeys 8. provide sufficient infrastructure 9. promote sustainable communities 10. encourage active lifestyles	- / - + + - / + + -?	
	Commentary An alternative approach would be to not identify larger areas of greenery that are important to the character, appearance and legibility of the borough. This would potentially allow the ad-hoc and incremental erosion of these features. If specific areas where improvements to existing structural landscaping or new areas were not identified, the potential to enhance the quality of the built environment and key landscape features would be reduced.		

Policy CH5: Comprehensive Development			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 1 has been chosen since the incremental development of the land could preclude the potential phasing of a more comprehensive development that would reduce the opportunity to maximise the number of homes and employment space (SA Objective 4 & 5) within the Borough. In addition, this policy would also reduce		

	the amount of Greenfield land and/or land affected by flood risk that would be required (for housing, employment etc), which will assist in achieving a reduction in climate change (SA Objective 1) and the conservation of the existing landscape (SA Objective 6).		
Option 1: A policy will be created in the Local Plan that will not grant planning permission which unduly affects the development potential of the adjoining land or jeopardises the proper planning of the area.	1. minimise climate change 2. adapt to climate change 3. protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. conserve/enhance biodiversity and landscape 7. promote sustainable journeys 8. provide sufficient infrastructure 9. promote sustainable communities 10. encourage active lifestyles	+ + + ++ ++ + + + + /	
Commentary Land suitable for development is limited within the borough and should not be prevented from coming forward or limited in its potential by proposals on the adjoining land. The policy should reduce the amount of countryside or land at risk of flooding required for development and make better use of infrastructure, reducing some of the impact on climate change (SA objectives 1 and 7). Land would be developed more efficiently increasing the amount of development for housing or employment, for example, which would have a significant positive impact (SA objectives 4, 5 and 8).			
Option 2 Delete policy and rely on the NPPF	1. minimise climate change 2. adapt to climate change 3. protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. conserve/enhance biodiversity and landscape 7. promote sustainable journeys 8. provide sufficient infrastructure 9. promote sustainable communities 10. encourage active lifestyles	- + + -? -? + - -? + +	
Commentary Land suitable for development is limited within the borough and could be prevented from coming forward or limited in its potential by proposals on adjoining land. The less efficient use of land could increase the amount of countryside or land at risk of flooding required for development and make less use of existing infrastructure and increase the impact of climate change (SA objectives 1 and 7). Land would not be developed efficiently decreasing the amount of development for housing or employment, for example (SA objectives 4, 5 and 8).			

Policy CH6: Standards for New Housing Development			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 1 was chosen		
Option 1: To include standards for external and internal space within a Local Plan Policy	1. minimise climate change 2. adapt to climate change 3. protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. conserve/enhance biodiversity and landscape 7. promote sustainable journeys 8. provide sufficient infrastructure 9. promote sustainable communities	+ + ++ ++ 0 + 0 0 +	

	10. encourage active lifestyles	+	
	<p>Commentary The inclusion of external and internal space standards in the Local Plan policy allows for greater level of consistency of application of policy. Adequate space within dwellings allows for sufficient drying space and natural lighting opportunities reducing pressures on electrical usage, and increases natural surface water infiltration, evaporation or harvesting, therefore reducing runoff and downstream flooding and allowing for opportunities to conserve and enhance biodiversity and landscape are taken into account during the design and layout of a development scheme. Minimising and adapting to climate change (Objectives 1, 2 and 3). The policy ensures the Local Plan has a significant positive impact on Objective 3, by ensuring the provision of decent, affordable homes. Good layout and space standards promotes sustainable communities and encourages active lifestyles (Objectives 9 and 10) by ensuring amenity between neighbouring properties are protected; allows for children to have access to adequate outdoor space for safe, exercise and outdoor play; encourages hobbies such as gardening and home-grown food opportunities. The policy is not considered to have an impact on Objectives 5, 7 or 8.</p>		
Option 2: To include a Policy linking to external and internal space standards within supplementary planning guidance.	1. minimise climate change 2. adapt to climate change 3. protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. conserve/enhance biodiversity and landscape 7. promote sustainable journeys 8. provide sufficient infrastructure 9. promote sustainable communities 10. encourage active lifestyles	+? +? +? +? 0 +? 0 0 ? ?	
	<p>Commentary With the reliance of guidance in SPD rather than the Local Plan it is considered the consistency of implementation of the standards may be reduced leading to greater uncertainty of delivery of the Sustainability Objectives.</p>		
Option 3: To rely on the Policy requirements in NPPF and general design standard policies (i.e. CH2 and CH3) and consider applications on a case by case basis.	1. minimise climate change 2. adapt to climate change 3. protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. conserve/enhance biodiversity and landscape 7. promote sustainable journeys 8. provide sufficient infrastructure 9. promote sustainable communities 10. encourage active lifestyles	0 0 +? +? 0 0 0 0 0 0	
	<p>Commentary Without any local policy it would be impossible to insist on locally distinctive standards or provide certainty.</p>		

Policy CH7: Employment Development adjacent to Residential Areas			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 2 was chosen.		
Option 1: to roll forward Saved Local Plan policy and identify buffer zones	1. minimise climate change 2. adapt to climate change 3. protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. conserve/enhance biodiversity and landscape	0 0 + - 0 0	

	7. promote sustainable journeys 8. provide sufficient infrastructure 9. promote sustainable communities 10. encourage active lifestyles	0 0 - 0	
	Commentary This policy option was considered would be too restrictive in light of the NPPF for specific locations and would leave no control elsewhere.		
Option 2: to have a policy which ensures protection of amenity from adjacent employment proposals.	1. minimise climate change 2. adapt to climate change 3. protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. conserve/enhance biodiversity and landscape 7. promote sustainable journeys 8. provide sufficient infrastructure 9. promote sustainable communities 10. encourage active lifestyles	0 0 ++ + + 0 ? ? + 0	
	Commentary This policy option would provide significant positive impacts to the protection and enhancement of the built environment (Objective 3) allowing for consideration to be given on a case-by-case basis and allowing for solutions to be found appropriate to the specific circumstances. This flexibility also ensures that there is a positive impact on Objectives 4, 5 and 9 also. The impact upon Objectives 7 and 8 are uncertain. It is considered there would be no impact on Objectives 1, 2, 6 and 10 with regards to this policy option.		
Option 3: No policy in the Local Plan and rely on NPPF and general CH3 amenity policy only.	1. minimise climate change 2. adapt to climate change 3. protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. conserve/enhance biodiversity and landscape 7. promote sustainable journeys 8. provide sufficient infrastructure 9. promote sustainable communities 10. encourage active lifestyles	0 0 -? 0 +? 0 0 - -? 0	
	Commentary It is considered this option would not provide the certainty required to ensure positive impacts on the Sustainability Objectives could be achieved. There may be an uncertain or slight positive impact on maintaining and supporting employment through less restrictions.		

Policy CH8: National Heritage Designations			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option:	Option one allows positive impacts to be secured for our existing built and natural environment (SA Objective 3 and 6) to secure them for future generations. Whilst all options produce relatively positive impacts on the sustainability objectives, it was considered that producing local guidance that specifies the merits and attributes of the Conservation Area and Listed Buildings would have greater benefits by making the Local Plan more locally distinctive. However, there is an element of restriction to yields or densities that might not be imposed if the area was not designated or protected and this is reflected in the scoring.		
Option 1: To retain designations and produce local guidance and	1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 4. the opportunity to live in a decent and affordable home	+ 0 ++ - ++	To ensure that any development is of high quality with regards to the impact on its surround and the internal living arrangements, as well as reflecting the external character

consider future protections and designations of new areas and buildings of distinctive merit. To allow new designations and support all designations with explanatory text and information to inform quality developments that respects the key elements of that particular building or area.	5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 9. To promote healthy, active, cohesive and socially sustainable communities.	+ +	of the area.
	<p>Commentary Sustainability Objective 7 has been scoped out, since the designation and protection does not impact on travel patterns. Sustainability Objectives 8 and 10 are also not relevant and would not be positively or negatively impacted.</p> <p>This preferred option ensures that existing successful developments, with regards to the social and built environments and their landscaping and settings can be retained. This restriction to the intensity of development, however, may reduce the viability of new developments through more stringent controls. This policy will be dovetailed with a local designations policy.</p>		
Option 2: To rely on national guidance only: only retain those existing designations that are supported by national guidance (i.e. de-designate ASEQs and locally listed buildings) and do not have a specific heritage policy in the Local Plan.	1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 4. the opportunity to live in a decent and affordable home 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 9. To promote healthy, active, cohesive and socially sustainable communities.	+? +? ++ - 0 ++ +	The restrictions to development could be through more stringent controls on design, space or materials and this may have an impact on development viability and yields.
	<p>Commentary As above, Sustainability Objective 7 is irrelevant as the designation and protection does not impact on travel patterns. Sustainability Objective 8 & 10 are also not relevant and would not be affected positively or negatively.</p> <p>This option ensures that the existing successful developments that have national protection with regards to the social and built environments and their landscaping and settings, can be retained. However, the policy would, in a negative sense, allow developments that do not respect areas previously protected. In addition, they do not facilitate the promotion or enhancement of the locally distinctive nature of the town and its unique history and character. The use of national designations only, may reduce the protection given to elements of the town that should be protected and recorded, which could result in the loss of such important features and the contribution they make to the town, including its aesthetic.</p>		
Option 3: Maintain the existing national designations but do not designate new conservation areas, ASEQs or Locally Listed Buildings or have policies that enhance their environs or specify why they are important.	1. To minimise climate change 2. To adapt to climate change 3. Protect / enhance built environment 4. the opportunity to live in a decent and affordable home 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 9. To promote healthy, active, cohesive and socially sustainable communities.	+ + + - +? +? +	The restrictions to development might be through the more stringent control of design, space or materials and this may have an impact on development viability and yields.
	<p>Commentary As per the previous options, the same factors have been scoped out regarding Sustainability Objectives 7, 8 and 10, which are also not relevant and would not be positively or negatively impacted.</p> <p>This policy option ensures that some existing successful developments, with regards to their social and built environments and their landscaping and settings, can be retained. However, the policy does not promote or enhance the locally distinctive nature of the town and its unique history and character, nor would it allow for any new areas to be protected, or those that develop over time. The use of only those areas that are already designated may reduce the protection given to elements of the town that should be protected and recorded, which could result in the loss of such important features and the unique contribution they make to the town and its aesthetics. With regard to Sustainability Objective 4, the restriction to the intensity of the development, however, may reduce economic viability through more stringent controls.</p>		

Policy CH9: Local Heritage Designations			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option:	The preferred option (option one) is to define locally distinctive areas and buildings and continue to support their identification through a clear policy framework underpinned by guidance and information about what qualities and merits the area or building(s) have, that are worthy of protection. Whilst all the options produced relatively positive impacts on the sustainability objectives, it was considered that producing local guidance and protecting further areas and buildings would have greater benefits by making the Local Plan more locally distinctive.		
Option 1: To produce local guidance to support existing designations, and continue to protect further areas and buildings of locally distinctive merit.	1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 4. the opportunity to live in a decent and affordable home 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 9. To promote healthy, active, cohesive and socially sustainable communities.	0 +? + - +? +? +	The restrictions to development might be through the more stringent control of design, space or materials and this may have an impact on development viability and yields.
Commentary Sustainability Objectives 7, 8 and 10 are not considered to be relevant to the designation of new areas or buildings. This option ensures that some existing successful developments, with regard to their social and built environs and their landscaping and settings, can be retained. This policy option allows us to promote and enhance the locally distinctive nature of the town and its unique history and character, and moreover, allows any new areas to be protected, or those that we wish to identify for consideration over time. With regard to Sustainability Objective 4, the restriction to the intensity of new developments, however, may reduce economic viability through more stringent design controls, or reductions in the number of units or the amount of development that can be achieved, as opposed to the areas that do not have such restrictions or designations.			
Option 2: To rely on national/ and regional guidance only: only retain those existing designations that are supported by national guidance (i.e. de-designate ASEQs and locally listed buildings) and do not have a specific heritage policy in the Local Plan.	1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 8. Ensure the provision of sufficient infrastructure 9. To promote healthy, active, cohesive and socially sustainable communities.	+ +? ++ - +? +? +	The restrictions to development might be more stringent in terms of design, space or materials, and this may have an impact on development viability and yields.
Commentary Sustainability Objectives 4, 7 and 10 are not considered to be relevant to the designation of new areas or buildings. This option ensures that some existing successful developments, with regards to the social and built environments and their landscaping and settings, can be retained. Where a statutory designation is warranted, however, the option does not promote or enhance the locally distinctive nature of the town and its unique history and character, nor would it allow for any new areas to be protected, or those that develop over time. The use of only those areas that are already designated may reduce the protection given to elements of the town that should be protected and recorded, which could result in the loss of such important features and the unique contribution they make to the town and its aesthetic. With regard to Sustainability Objective 4, the restriction to the scope of development may reduce the economic viability of schemes through more stringent controls.			
Option 3: Rely on NPPF and do not designate or protect any buildings or areas	1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats	- - - - 0	The restrictions to development might be more stringent in terms of design, space or materials, and this may have an impact on development viability and yields.

	9 To promote healthy, active, cohesive and socially sustainable communities.	/	
	<p>Commentary Sustainability Objectives 4, 7, 8 and 10 are not considered to be relevant to the designation of new areas or buildings.</p> <p>This option does not promote or enhance the locally distinctive nature of the town and its unique history and character, nor would it allow for any new areas to be protected, or those that develop over time.</p> <p>The lack of clarity given to a new policy approach could lead to inappropriate developments and the loss of key features throughout the town.</p>		

Policy CH10: Historic Parks and Gardens and other Heritage Assets			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option:	Whilst both options produced relatively positive impacts on the sustainability objectives, it was considered that option 1, which would produce local guidance to protect further areas and buildings, would have greater benefits by making the Local Plan more locally distinctive.		
Option 1: To produce local guidance and protect and identify historic parks and other designations	1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 4. the opportunity to live in a decent and affordable home 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 9. To promote healthy, active, cohesive and socially sustainable communities.	+ +? ++ - 0 + 0	The restrictions to development might be more stringent in terms of design, space or materials, and this may have an impact on development viability and yields.
	<p>Commentary By identifying local heritage assets and specific areas that warrant protection, clarity is provided to developers, as well as defining the merits and role of any designation. Sustainability Objectives 7, 8, and 10 are not relevant with regards to infrastructure provision, reducing car journeys and participation in sport. The chosen option allows development to respect the setting and identity of an area and can be more locally distinctive. Relying on the NPPF does not allow such thorough application in special areas.</p>		
Option 2: To rely on the NPPF only	1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 9. To promote healthy, active, cohesive and socially sustainable communities.	- / + ? + 0	
	<p>Commentary This option would remove any locally distinctive designations of other areas and would provide less clarity for developers on where special design, materials or features may be required. This may result in the loss of important characteristics that are significant to the town.</p>		

Policy CH11: Important Views			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 1 has been chosen as the preferred option, since it is believed that not managing the important views (Option 2) could lead to incremental development that could erode the important views fundamentally (SA Objective 3 and 6). In addition, soft landscaping can play a large part in minimising climate change (SA Objective 1), but its potential development could hinder this. Although Option 1 may lead to the restriction of development potential (SA Objective 4 and 5), the other environmental benefits of the preferred policy would appear to outweigh such a restriction.		
Option 1	1. minimise climate change 2. adapt to climate change	+ +	

Create a new policy within the Local Plan which identifies a number of important views, and endeavours to protect and/or enhance those views through the restriction of development that would adversely affect such views.	3. protect/enhance built environment	++	
	4. Decent, affordable homes	?	
	5. Maintain/support employment	?	
	6. conserve/enhance biodiversity and landscape	++	
	7. promote sustainable journeys	+	
	8. provide sufficient infrastructure	+	
	9. promote sustainable communities	+	
	10. encourage active lifestyles	+	
Commentary			
There are views in the Borough that are worthy of protection and enhancement. A number of views include significant tree cover or the potential for the view to be enhanced by additional trees, which could reduce the impact on the climate and help the area adapt to the effects of climate change (SA Objective 1 and 2). This proposed policy option would protect and enhance the built environment and key landscape features, and moreover, could have a significant positive impact on sustainability (SA objectives 3 and 6). This option could have a negative impact on development potential (SA objectives 4 and 5), but an attractive environment can attract further investment and create an attractive place in which to live.			
Option 2 Delete policy and rely on the NPPF	1. minimise climate change	-?	
	2. adapt to climate change	-?	
	3. protect/enhance built environment	-	
	4. Decent, affordable homes	+	
	5. Maintain/support employment	+	
	6. conserve/enhance biodiversity and landscape	-	
	7. promote sustainable journeys	+	
	8. provide sufficient infrastructure	+	
	9. promote sustainable communities	+	
	10. encourage active lifestyles	+	
Commentary			
An alternative approach would be to not identify and manage views that are important to the character, appearance and legibility of the Borough. This would potentially allow the ad-hoc and incremental erosion of these features.			

Policy CH12: Development Beyond The Built-up Area Boundary			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option:	<p>Option 1, to develop a local policy to conserve and enhance the countryside rather than relying on national guidance, is preferred. This enables landscape of local importance to be conserved and also provides the evidence base to support green infrastructure opportunities and proposals.</p> <p>Options for the countryside between Crawley, Gatwick and Horley were appraised. It was found that conserving and enhancing the open character of the area whilst encouraging appropriate recreational and environmental enhancements is the preferred option.</p> <p>It is considered that the use of a Landscape Character Assessment provides the local distinctiveness to enable the countryside to be conserved and enhanced in a manner that is appropriate in the Crawley context.</p>		
Option 1: develop local policy to conserve and enhance the countryside	1. minimise climate change	+	
	2. adapt to climate change	?	
	3. protect/enhance built environment	+	
	4. Decent, affordable homes	?	
	5. Maintain/support employment	/	
	6. conserve/enhance biodiversity and landscape	+	
	7. promote sustainable journeys	+	
	8. provide sufficient infrastructure	?	
	9. promote sustainable communities	+	
	10. encourage active lifestyles	+	
Commentary			
This enables landscape of local importance to be conserved and also provides the evidence base to support green infrastructure opportunities and proposals.			
Option 2: rely on national guidance	1. minimise climate change	+	
	2. adapt to climate change	?	

solely	3. protect/enhance built environment	+	
	4. Decent, affordable homes	?	
	5. Maintain/support employment	?	
	6. conserve/enhance biodiversity and landscape	-	
	7. promote sustainable journeys	+	
	8. provide sufficient infrastructure	?	
	9. promote sustainable communities	-?	
	10. encourage active lifestyles	-?	
Commentary			
There would be no mechanism for addressing current or future issues which are distinctive to Crawley's landscape character beyond the urban area. With a lack of locally specific evidence it would be difficult for the council to assess the acceptability of proposals in the countryside. Without guidelines it would not be possible to identify the appropriate management and enhancement of areas. On this basis, the option for relying on national policy is not being advocated as the preferred strategy.			
Option 3: roll forward existing policy: retain strategic gap	1. minimise climate change	+	
	2. adapt to climate change	?	
	3. protect/enhance built environment	+	
	4. Decent, affordable homes	?	
	5. Maintain/support employment	-?	
	6. conserve/enhance biodiversity and landscape	-	
	7. promote sustainable journeys	+	
	8. provide sufficient infrastructure	-?	
	9. promote sustainable communities	0	
	10. encourage active lifestyles	-	
Commentary			
An option could be to retain the strategic gap designation but this is now not supported by national policy as it does little to encourage appropriate development. Criteria based policy informed by a Landscape Character Assessment aims to provide the necessary protection for former areas of strategic gap. It is considered this is the case, so the retention of strategic gaps is not being advocated as a preferred strategy.			

Economic Growth

Policy EC1: Economic Growth			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option:	Option 3: Adopt a spatial approach, identifying key employment sites within a locally-specific hierarchy to direct economic growth to the most sustainable and appropriate locations. Through implementing a locally and spatially specific policy, it is considered that this approach represents the most appropriate means of interpreting NPPF guidance at the local level to promote economic growth at Crawley.		
Option 1: Rely on the National Planning Policy Framework to ensure that economic growth is directed to the most sustainable and appropriate locations.	1. To minimise climate change	-?	
	2. To adapt to climate change	-?	
	5. Maintain/ support employment base	-	
	7. Reduce car journeys		
	9. Promote healthy, active, cohesive and socially sustainable communities	?	
		?	
Commentary: This approach would rely on the NPPF as a means of directing employment to the most appropriate and sustainable locations.			
A key aspect of the NPPF is the requirement that in drafting local plans, local planning authorities should plan proactively to meet the needs of business (paragraph 20) and set out a clear economic vision and strategy for their area which positively and proactively encourages growth paragraph 21). A need for local planning authorities to identify strategic sites for investment whilst supporting existing business sectors is also identified (paragraph 21).			
In this sense there is concern that a reliance solely on the NPPF would be to ignore the need for a holistic vision for economic growth in Crawley over the plan period. With no such strategy in place, there is risk that the economic growth of the borough (and as appropriate			

	<p>wider sub-region) could not be identified and accommodated. Therefore, development of a local policy approach that interprets the guidance of the NPPF and steers economic growth at Crawley, is considered to represent a vital component of the local plan.</p> <p>Without a clear local vision and employment hierarchy, it is uncertain how economic growth could be directed to the most sustainable locations. As such, the impacts of the approach in terms of climate change, car journey reduction, and promotion of sustainable communities is uncertain. Further, by failing to identify employment locations at the local level, it is likely that the approach could negatively impact upon the function of established employment locations.</p> <p>Having regard to the above, Option 1 is not considered to represent the most sustainable approach to promoting economic growth, and is therefore dismissed.</p> <p>Objectives scoped out: 3, 4, 6, 8, and 10 - it is not considered that the above option would impact on these objectives.</p>		
<p>Option 2: Roll forward the adopted Core Strategy (2008) approach to resist the loss of employment sites unless reasons to justify the loss can be demonstrated.</p>	<p>1. To minimise climate change 2. To adapt to climate change 5. Maintain/ support employment base 7. Reduce car journeys 9. Promote healthy, active, cohesive and socially sustainable communities</p>	<p>-? -? -? -? -?</p>	
<p>Option 3: Adopt a spatial approach, identifying key employment sites within a locally-specific hierarchy to direct economic growth to the most sustainable and appropriate locations.</p>	<p>1. To minimise climate change 2. To adapt to climate change 5. Maintain/ support employment base 7. Reduce car journeys 9. Promote healthy, active, cohesive and socially sustainable communities</p>	<p>+ + + + +</p>	
	<p>Commentary: This approach would roll forward the existing Core Strategy approach whereby all employment sites, particularly those in the Main Employment Areas, will be protected unless reasons to justify the loss can be demonstrated. Whilst broadly reflecting key NPPF messages to promote economic growth and support existing business sectors, there is conflict with NPPF paragraph 22, which sets out that planning policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of the site being used for that purpose.</p> <p>In resisting the loss of employment sites to other uses, it is arguable that the approach would not apply the flexibility or diversity of use encouraged in the NPPF, potentially restricting the scope for other appropriate uses. This is likely to have a negative impact in terms of Objectives 1, 2, 5, 7, and 9. For the above reasons, the approach is not considered to represent the most sustainable way forward, and Option 2 is therefore dismissed.</p> <p>Objectives scoped out: 3, 4, 6, 8, and 10 - it is not considered that the above option would impact on these objectives.</p> <p>Commentary: Under Option 3, the local plan would adopt a spatial approach to identify a hierarchy of employment sites, taking local circumstance into consideration to direct economic growth to the most sustainable and appropriate locations.</p> <p>In doing so, Option 3 would enable the local plan would plan to proactively meet the needs of business (NPPF paragraph 20) and set out a clear economic vision and strategy for the area (paragraph 21). Further, the approach reflects NPPF requirements to identify strategic sites for investment whilst supporting existing business sectors (paragraph 21). In this regard, the implementation of a locally and spatially specific policy approach to interpret the guidance of the NPPF and steer economic growth at Crawley, is considered to represent a vital component of the local plan.</p> <p>In identifying a clear network of employment sites across the borough for economic growth, the approach should contribute towards the reduction of car journeys, and promotion of sustainable communities and minimisation/ adaptation to climate change, whilst promoting a strong employment space through a clearly defined hierarchical approach.</p> <p>As such, Option 3 is considered to represent the most sustainable means of promoting economic growth, and is progressed as the preferred option.</p> <p>Objectives scoped out: 3, 4, 6, 8, and 10 - it is not considered that the above option would impact on these objectives.</p>		

Policy EC2: Town Centre North			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option:	Although Option 2 would not deliver the full range of benefits associated with Option 1, and as a consequence, might be less sustainable, the scheme would deliver a number of benefits for the town centre, and is considered to represent the most appropriate approach in terms of achieving deliverability and sustainability. Significantly, Option 2 is viable and deliverable in the current economic climate, and as such, should be the chosen policy option.		
Option: 1 Continuing with the current Town Centre North scheme on a comprehensive basis as envisaged in the adopted Core Strategy (2008).	<ol style="list-style-type: none"> 1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home. 5. Maintain/ support employment base 6. Conserve/enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Promote healthy, active, cohesive and socially sustainable communities 10. Participate in sport/ health 	<p style="text-align: center;">+ + ++ ++ ++ ? ++ ++ ++ +?</p>	
<p>Commentary: This option involves the pursuit of TCN in accordance with the scheme design prepared in partnership with Grosvenor, and reflected in the adopted Crawley Borough Core Strategy (2007) and Town Centre North SPD (2009). Implementation of TCN in its current format would result in the comprehensive delivery of circa 62,000 sq m of retail floorspace net, alongside 26 new A3 units, a cinema, a new Town Hall, PCT facility, 760 town centre dwellings and 3125 car parking spaces. The site required to deliver the scheme is identical to the area identified in the existing Core Strategy (2008) site allocation.</p> <p>If implemented as envisaged by the Core Strategy and TCN SPD, the resultant scheme would deliver the desired step change and successfully elevate Crawley's profile as a major sub-regional centre. It would also result in a major uplift in the quality and quantity of the town's retail offer, and improve the overall quality of the town centre environment. However, the Retail Capacity and Impact Study (2010) has identified that there is no longer sufficient retail expenditure capacity to support a scheme of this size prior to 2026, and the scheme would not be viable nor deliverable in this format, neither now, nor in the foreseeable future. For these reasons, although Alternative Option 1 represents a sustainable policy approach, it cannot be delivered, and is therefore dismissed.</p>			
Option: 2 Develop the overall TCN concept in phases, including a core retail element	<ol style="list-style-type: none"> 1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home. 5. Maintain/ support employment base 6. Conserve/enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Promote healthy, active, cohesive and socially sustainable communities 10. Participate in sport/ health 	<p style="text-align: center;">+ + ++ +? + ? ++ ++ ++ +?</p>	
<p>Commentary: This option involves the continued pursuit of Town Centre North, albeit with the core retail element in a different and smaller format to that originally conceived in partnership with Grosvenor. This approach would require significant re-design and value-engineering to develop a concept that more effectively responds to current and future market conditions, whilst maintaining a focus on achieving a high quality development outcome to deliver the town centre's retail-led step change aspiration. Elements of the Grosvenor TCN scheme considered non-essential, or with a poor cost-benefit relationship would be removed from the retail-led scheme. In reality this would likely result in a 'de-coupling' of the scheme's retail and residential components, which would then be delivered in separate phases. This scheme would be delivered within the same broad area as the Core Strategy TCN allocation, albeit, most likely on a reduced site footprint.</p> <p>It is considered that a high quality retail element of the overall revised TCN concept, located</p>			

	<p>in the northern quadrant with strong links to the existing Primary Shopping Area (PSA) and of a scale consistent with forecast retail capacity, would deliver the desired step change to the town centre and subsequently elevate Crawley's profile as a major sub-regional centre. It could still support a major department store, and would provide a significant improvement in the quality of the town centre. An approach focussing on a smaller core retail element allows the potential to retain a number of value generating components of the Option 1 TCN scheme whilst de-risking and scaling back the largest element of the TCN allocation to a deliverable scale to improve viability and to reflect the more limited development market. A more focussed and viable retail element of the overall revised TCN concept will inherently be more deliverable; however, there will still be a number of risks to overcome, such as land assembly, pre-lets and obtaining development finance for a major development scheme.</p>		
Option: 3 A new scheme in Town Centre East.	<ol style="list-style-type: none"> 1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home. 5. Maintain/ support employment base 6. Conserve/enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Promote healthy, active, cohesive and socially sustainable communities 10. Participate in sport/ health 	<p style="text-align: center;">+ + - +? + ? + + + +? +?</p>	
	<p>Commentary: Option 3 involves delivering a new town centre scheme in the town centre's east, on land broadly framed by Northgate Avenue to the north and Telford Place to the south, linking in with the town centre via The Boulevard, Queensway and County Mall. Pursuit of this option would require the conception of an entirely new scheme, underpinned by extensive new background, technical and evidential analysis to understand the intricacies and challenges of such an approach, and also to develop an appreciation of the potential effects (positive and negative) on delivering a major extension to the town centre in this location.</p> <p>A scheme of a scale consistent with forecast retail capacity has the potential to deliver a step change to the town centre. However, the site is divorced from the existing town centre core, and this would severely limit the scheme's ability to provide a significant uplift to the wider town centre. Much of the site is already characterised by a good quality environment, including the new library and college buildings, and a scheme in this location would be harmful to the existing environmental character of the area, though would improve the retail environment within its site boundaries.</p> <p>Scheme viability, and therefore delivery, in this location would represent a number of challenges. It is doubtful that key retailers would commit to a scheme so divorced from the town centre. Further, pulling the pedestrian footfall to the east over College Road will affect value aspirations. Addressing the College Road/Haslett Avenue East Road network could increase infrastructure costs significantly. Identifying and delivering an alternative site for the Central Sussex College and the Library would be significant in addition to the loss of a significant town centre located catchment base from this location. For these reasons, this option is not considered to represent a sustainable policy approach, and is also dismissed.</p>		
Option : 4 A new scheme in Town Centre West	<ol style="list-style-type: none"> 1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home. 5. Maintain/ support employment base 6. Conserve/enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Promote healthy, active, cohesive and socially sustainable communities 10. Participate in sport/ health 	<p style="text-align: center;">+ + ++ +? + ? ++ + + + +?</p>	
	<p>Commentary: Option 4 is to deliver a new town centre scheme to the west of the Primary Shopping Area, on land broadly framed by High Street to the west, Haslett Avenue West to the south, The Boulevard to the north, and linking directly with the Martletts and Queens Square. This option would also require conception of an entirely new scheme, underpinned</p>		

	<p>by extensive background, technical and evidential analysis to understand the intricacies and challenges of such an approach, and also to develop an appreciation of the potential effects (positive and negative) on delivering such a major extension to the town centre in this location.</p> <p>The size of the scheme capable of being delivered in this location is somewhat limited by the extent and availability of land between High Street and the existing Primary Shopping Area, and is also constrained by the town centre's High Street Conservation Area. While a scheme in this location would undoubtedly deliver a major improvement to the town centre, it is questionable whether this would be significant enough to achieve the desired step change and raise Crawley's profile to that of the major sub-regional centre. In this regard, it is questionable as to whether there would be sufficient space to deliver a department anchor store in this location. Although the location could link in well with the existing Primary Shopping Area, would significantly enhance the environment of this area, and provide a much needed lift to the town centre, the magnitude of the positive benefits to the town centre's wider environment would be limited by the amount of land available for such a scheme in this location. These spatial constraints also create limited capacity to provide other town centre uses alongside new retail floorspace, and other uses would therefore need to be delivered independently through separate development proposals.</p> <p>Economic viability in this location is likely to be challenged by complex land assembly and highways issues. Replacing existing primary retail with different retail space is likely to be expensive and is typically not common practice due to the implications of this on viability resulting from high land assembly costs. The area's spatial constraints and existing retail function would limit the amount of new retail floorspace able to be achieved under this option, which could impact heavily upon the viability of the scheme. Should the delivery of a department anchor store in this location not be possible in spatial terms, rents on the enabling shop units would be adversely affected due to the removal of the 'critical anchor'. Deliverability and phasing in this location will present a challenge in terms of gaining vacant possession and timings. For these reasons, this option is not considered to represent a sustainable development approach and may also be unviable; this option is therefore dismissed.</p>		
<p>Option: 5 An asset management and piecemeal approach to town centre development.</p>	<ol style="list-style-type: none"> 1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home. 5. Maintain/ support employment base 6. Conserve/enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Promote healthy, active, cohesive and socially sustainable communities 10. Participate in sport/ health 	<p style="text-align: center;">?</p> <p style="text-align: center;">?</p> <p style="text-align: center;">?</p> <p style="text-align: center;">?</p> <p style="text-align: center;">+</p> <p style="text-align: center;">?</p> <p style="text-align: center;">+</p> <p style="text-align: center;">-?</p> <p style="text-align: center;">+</p> <p style="text-align: center;">?</p>	
<p>Commentary: Option 5 is to pursue the future regeneration and improvement of the town centre through a number of smaller piecemeal developments (including refurbishing the existing County Mall), as opposed to promoting a comprehensive retail-led town centre expansion which may still allow smaller scale developments to take place in the short term. This option would require a change in strategy for rejuvenating the town centre, involving the delivery of a series of strategic town centre sites as opposed to a single major town centre expansion. Together these sites would contribute to improving the town centre's retail offer, enhancing the physical environment, and raising Crawley's overall profile to that of a vibrant sub-regional town centre. As there are no definitive sites under this option, the areas for improvement would need to be identified through a comprehensive town centre review to establish the most appropriate locations for direct intervention.</p> <p>This option would be viable and deliverable, although it is unlikely to be capable of delivering the desired step change, and similarly would be ineffective in raising Crawley's profile as a major sub-regional centre. A genuine step change will only be capable via a comprehensive approach which substantially alters the town centre's urban fabric and retail offer. Under this approach, Individual development proposals would be delivered 'as and when' with no real strong linkages or co-ordination. It is unlikely that a series of smaller disparate proposals would be effective at providing the desired step change in the town centre's physical environment, whilst the lack of a comprehensive approach, would significantly limit the ability of this option to provide the major improvement in the quality and quantity of the town centre's retail offer. The piecemeal approach adopted under this option would be unlikely to</p>			

	be able to support the delivery of significant new housing and other town centre facilities. For these reasons, in particular the scope for uncertainty, this option is not considered to represent the most sustainable development approach.
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Policy EC3: Town Centre Development Sites			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option: Option 3	<p>This chosen policy approach (Option 3) identifies and allocates a number of sustainable town centre and edge-of-centre sites for mixed-use development. The options considered have included:</p> <ol style="list-style-type: none"> maintaining existing Core Strategy allocations; maintaining existing allocations and in addition, allocating other identified sites, setting out clear development principles. <p>Maintaining the current policy option (Option 1) would represent a sustainable policy approach (particularly SA Objective 4, 5 and 10) but would also be insufficient in terms of allocating sites to fulfil the demands for the town centre uses, as required under Paragraph 23 of the NPPF. Therefore, Option 3, which endeavours to allocate further sites through the SHLAA and to identify further allocations from the TCW SPD, would be more flexible in developing Town Centre sites. This preferred option (Option 3) would be economically more viable than Option 1 and perhaps the more sustainable option also.</p>		
Option 1: Maintain the existing approach to roll forward Core Strategy allocations, with other sites maintained as unallocated 'opportunity sites'.	<ol style="list-style-type: none"> To minimise climate change To adapt to climate change Protect/enhance built environment Ensure everyone has the opportunity to live in a decent and affordable home. Maintain/ support employment base Reduce car journeys Ensure the provision of sufficient infrastructure Promote healthy, active, cohesive and socially sustainable communities Participate in sport/ health 	<p>?</p> <p>?</p> <p>+?</p> <p>+</p> <p>+</p> <p>+</p> <p>+</p> <p>+</p> <p>+</p>	
	<p>Commentary: It is considered that an approach rolling forward existing Core Strategy allocations would represent a sustainable policy approach to deliver development, particularly in terms of providing access to homes, jobs, and participation in sport (meeting objectives 4, 5 and 10, depending upon the development type). The allocation of sustainable town centre and edge-of-centre mixed-use development sites supports the reduction of car journeys (objective 7) and promotes sustainable communities (objective 9). Through the Community Infrastructure Levy (CIL), this option will also ensure the provision of sufficient infrastructure (objective 8).</p> <p>This approach is, however, unlikely to provide sufficient allocations capable of meeting the full demand for town centre uses including retail, employment, leisure and residential, as required under NPPF paragraph 23, and does not therefore represent the most sustainable option.</p> <p>Objective scoped out: Objective 6 conserve/enhance biodiversity habitats – no allocations are proposed within or adjacent to such biodiversity habitats.</p>		
Option 2: Roll forward Core Strategy allocations, and identify additional allocations from TCW SPD and through SHLAA process. Provide prescriptive policy guidance to detail appropriate uses for each allocation	<ol style="list-style-type: none"> To minimise climate change To adapt to climate change Protect/enhance built environment Ensure everyone has the opportunity to live in a decent and affordable home. Maintain/ support employment base Reduce car journeys Ensure the provision of sufficient infrastructure Promote healthy, active, cohesive and socially sustainable communities Participate in sport/ health 	<p>?</p> <p>?</p> <p>+?</p> <p>++</p> <p>++</p> <p>++</p> <p>++</p> <p>+</p> <p>++</p> <p>++</p>	
	<p>Commentary: This approach would involve the roll forward of existing Core Strategy allocations in addition to identifying new allocations from the Town Centre Wide SPD (existing 'opportunity areas') and scoping of any possible sites through the Strategic Housing Land Availability Assessment (SHLAA). Through identifying an increased number of</p>		

	<p>allocations, this approach provides greater opportunity to deliver homes, jobs, and leisure provision (meeting Sustainability Objectives 4, 5 and 10, depending upon development type). An increased allocation of sustainable town centre and edge-of-centre mixed-use development sites also supports the reduction of car journeys (objective 7) and promotes sustainable communities (objective 9). Through CIL, this option will also ensure the provision of sufficient infrastructure (objective 8).</p> <p>Through the allocation of an increased number of sites, this option is more capable of meeting the full demand for town centre uses including retail, employment, leisure and residential, as required under NPPF paragraph 23. It is, however, recognised that ensuring the viability and deliverability of sites remains a key NPPF objective, with paragraph 173 outlining that identified sites should not be subject to policy burdens that may compromise their ability to be developed viably. For this reason, it is considered that an element of flexibility should be incorporated into policy, and therefore, Option 2 is not considered to represent the most sustainable way forward.</p> <p>Objective scoped out: Objective 6 conserve/enhance biodiversity habitats – no allocations are proposed within or adjacent to such biodiversity habitats.</p>		
<p>Option: 3 Roll forward Core Strategy allocations, and identify additional allocations from TCW SPD and through the SHLAA. Provide flexible policy guidance to facilitate delivery.</p>	<ol style="list-style-type: none"> 1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home. 5. Maintain/ support employment base 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Promote healthy, active, cohesive and socially sustainable communities 10. Participate in sport/ health 	<p style="text-align: center;">?</p> <p style="text-align: center;">?</p> <p style="text-align: center;">+?</p> <p style="text-align: center;">++</p> <p style="text-align: center;">++</p> <p style="text-align: center;">++</p> <p style="text-align: center;">+</p> <p style="text-align: center;">++</p> <p style="text-align: center;">++</p>	
	<p>Commentary: This approach would involve the roll forward of existing Core Strategy allocations, in addition to identifying new allocations from the Town Centre Wide SPD (existing 'opportunity areas') and the scoping of any possible further sites through the SHLAA. Through identifying an increased number of allocations, this approach provides greater opportunity to deliver homes, jobs, and leisure provision (meeting Sustainability Objectives 4, 5 and 10, depending upon the development type). An increased allocation of sustainable town centre and edge-of-centre mixed-use development sites also supports the reduction of car journeys (SA Objective 7) and promotes sustainable communities (SA Objective 9). Through CIL, this option will also ensure the provision of sufficient infrastructure (SA Objective 8).</p> <p>Through the allocation of an increased number of sites (as opposed to Option 1), this option is more capable of meeting the full demand for town centre uses, including retail, employment, leisure and residential, as required under NPPF paragraph 23. This approach therefore reflects the NPPF requirement to allocate appropriate town centre and edge-of-centre sites to meet the full scale and type of retail, leisure, commercial, office, tourism, cultural, community, and residential development needed in town centres. This approach is also considered to reflect the NPPF requirement to plan positively and encourage economic activity (NPPF para. 23).</p> <p>It is, however, recognised that ensuring the viability and deliverability of sites remains a key NPPF objective, with paragraph 173 stating that identified sites should not be subject to policy burdens that may compromise their ability to be developed viably. For this reason, it is considered that by incorporating scope for the flexibility of different uses, this policy meets the NPPF objectives, and therefore, represents a more sustainable policy approach than Options 1 and 2.</p> <p>Objective scoped out: Objective 6 conserve/enhance biodiversity habitats – no allocations are proposed within or adjacent to biodiversity habitats.</p>		

Policy EC4: Town Centre Uses			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option: Option 3	<p>Option 3 has been chosen as the most sustainable option for managing town centre changes of use in order to ensure the continued vitality and viability of Crawley Town Centre. Although our previously used option (which has been successful in Crawley) one would also be a sustainable option, owing to the economic climate, many non-retail uses have been put forward that would assist in addressing vacancy rates across the town (SA Objective 5), and moreover, enhance the built environment (SA Objective 3). In addition, Option 1 (which has a three tiered approach to retail frontages) does not appear to reflect current national planning policy guidance.</p> <p>Option 2 has been considered too restrictive, particularly with regards to Use Class A2, which would be limited to only 15% in primary frontages may hamper economic development and maintain vacancies within the primary retail area (SA Objective 3 and 5). Both Options 4 and 5 have been considered to be too flexible with regards retail frontages, since although the flexible nature of both policy approaches may allow for a greater variety of developments within the Town Centre, the possible undermining of the retail element of the Town Centre could reduce the economic viability of the town as a whole (SA Objective 4 and 5).</p>		
Option 1: Limited Primary Frontage Flexibility	3. Protect/enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home. 5. Maintain/ support employment base 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Promote healthy, active, cohesive and socially sustainable communities 10. Participate in sport/ health	+? + + + + + +?	
	<p>Commentary: This approach would involve the direct translation of the current three-tiered Town Centre Wide Supplementary Planning Document approach into a local plan policy. Some flexibility is provided to enable A2 or A3 non-retail use in the core frontage, though the amount permitted is limited to 30% non-retail in any one frontage, of which no more than 15% should be occupied by A2 use. Greater flexibility is enabled in the primary frontage, where up to 50% of any one frontage may be occupied by non-retail uses A2, A3, A4, A5. The final tier, the secondary area, offers greatest policy flexibility, allowing A2, A3, A4, and A5 uses on an unrestricted basis subject to issues of amenity and disturbance.</p> <p>Although this approach has operated successfully in Crawley for a number of years, the nature of the high street has changed, with a greater variety of non-retail uses now seeking to locate in the town centre. This, coupled with an increase in vacancy rates across the town, suggests that a more flexible approach to non-retail use is required, and there is risk that a too prescriptive approach could stifle economic development. Further, the NPPF requires local planning authorities to define primary shopping areas based on a clear definition of primary and secondary frontages. On this basis, progression of a three tiered frontage approach is not considered to reflect national planning guidance, and therefore, Option 1 is not considered to represent a sustainable way forward.</p> <p>SA Objectives scoped out: Objective 1: Minimise climate change – it is not considered that small scale town centre change of use applications will impact on climate change. Objective 2: Adapt to climate change - – it is not considered that small scale town centre change of use applications will impact on climate change. Objective 6 conserve/enhance biodiversity habitats – no allocations are proposed within or adjacent to biodiversity habitats.</p>		
Option 2: Limited Primary Frontage Flexibility, Graded Secondary Frontage Flexibility	3. Protect/enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home. 5. Maintain/ support employment base 7. Reduce car journeys 8. Ensure the provision of sufficient	+? + + + +	

	infrastructure 9. Promote healthy, active, cohesive and socially sustainable communities 10. Participate in sport/ health	+ +?	
<p>Commentary: This approach would involve the implementation of a two-tiered retail frontage policy requiring the designation of primary and secondary frontages.</p> <p>As with the existing policy approach (Option 1), limited flexibility is afforded for non-retail uses within the primary shopping areas in order to maintain a concentration of retail uses. A2 or A3 uses are allowed in the primary frontage, though the amount permitted is limited to 30% non-retail in any one frontage, of which no more than 15% should be occupied by A2 usages.</p> <p>Flexibility of use is permitted in secondary frontages, where up to 50% of any one frontage might be occupied by a non-retail use, provided these fall within the A classes. This reflects the Town Centre Wide SPD approach, although a review of existing frontage designations will enable greater policy flexibility. Recognising the evening and night-time economy role of the High Street, Ifield Road and western part of Broad Walk, a new High Street Policy Area designation is introduced. For secondary frontages falling within this area, proposals for a change of use to non-retail within the A classes will normally be permitted, with proposals for other town centre uses to be considered on their individual merits.</p> <p>A two-tiered policy approach based on primary and secondary frontages reflects the guidance of the NPPF, particularly in terms of maintaining a concentration of retail uses within the primary shopping area. However, recognising the changing role of the high street in recent years, there is concern that limiting A2 uses within primary frontages to 15% is overly restrictive, potentially restricting customer choice and stifling economic investment. This would not fit with the overarching objectives of the NPPF, and Option 2 is not considered to represent the most sustainable policy approach.</p> <p>Objectives scoped out: Objective 1: Minimise climate change – it is not considered that small scale town centre change of use applications will impact on climate change.</p> <p>Objective 2: Adapt to climate change - – it is not considered that small scale town centre change of use applications will impact on climate change.</p> <p>Objective 6 conserve/enhance biodiversity habitats – no allocations are proposed within or adjacent to biodiversity habitats.</p>			
Option: 3 Moderate Primary Frontage Flexibility, Graded Secondary Frontage Flexibility	3. Protect/enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home. 5. Maintain/ support employment base 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Promote healthy, active, cohesive and socially sustainable communities 10. Participate in sport/health	+? + ++ ++ ++ ++ +?	<p>Commentary: This approach would involve the implementation of a two-tiered retail frontage policy requiring the designation of primary and secondary frontages.</p> <p>In contrast to Options 1 and 2, moderate flexibility is afforded for non-retail uses within the primary shopping area. This is achieved through enabling 30% of any one primary frontage to be occupied by non-retail uses provided these are A2 or A3 in nature. To increase flexibility, the 15% restriction on A2 use is removed.</p> <p>Flexibility of use is permitted in secondary frontages, where up to 50% of any one frontage may be occupied by non-retail use, provided these fall within the A classes. This reflects the Town Centre Wide SPD approach, although the review of existing frontage designations will enable greater policy flexibility. Recognising the evening and night-time economy role of the High Street, Ifield Road and western part of Broad Walk, a new High Street Policy Area designation is introduced. For secondary frontages falling within this area, proposals for a change of use to non-retail within the A classes will normally be permitted, with proposals for other town centre uses to be considered on their individual merits.</p> <p>In implementing a two-tiered approach based on primary and secondary frontages, the policy</p>

	<p>reflects the guidance of the NPPF. It is considered that by increasing flexibility for non-retail uses to 30% in primary frontages (without limiting A2 to 15%), and 50% in secondary frontages, the policy promotes customer choice whilst retaining a retail concentration in the primary shopping area. By designating a new High Street Policy Area, the policy also provides significant flexibility to encourage non-retail uses and appropriate town centre uses, whilst taking into account existing local circumstances. Through encouraging the promotion of a strong retail core, whilst enabling sufficient flexibility for other town centre uses, Option 3 is considered to represent the most sustainable policy approach.</p> <p>SA Objectives scoped out: Objective 1: Minimise climate change – it is not considered that small scale town centre change of use applications will impact on climate change.</p> <p>Objective 2: Adapt to climate change - – it is not considered that small scale town centre change of use applications will impact on climate change.</p> <p>Objective 6 conserve/enhance biodiversity habitats – no allocations are proposed within or adjacent to biodiversity habitats.</p>		
<p>Option 4: Moderate Primary Frontage Flexibility, Significant Secondary Frontage Flexibility</p>	<p>3. Protect/enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home. 5. Maintain/ support employment base 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Promote healthy, active, cohesive and socially sustainable communities 10. Participate in sport/ health</p>	<p>+? + +? ++ ++ + +?</p>	
	<p>Commentary: This approach would involve the implementation of a two-tiered retail frontage policy requiring the designation of primary and secondary frontages.</p> <p>As with the preferred approach, moderate flexibility is afforded to allow non-retail uses within the primary shopping area. This is achieved through enabling 30% of any one primary frontage to be occupied by non-retail uses provided these are A2 or A3 in nature. Flexibility is increased through the removal of the 15% restriction on A2 use. Significant flexibility for a full range of town centre uses is provided in the secondary area, with the maximum 50% non-retail threshold removed. With complete flexibility of uses enabled across all secondary frontages, the need for a High Street Policy Area is reduced, and this particular designation is removed from the policy.</p> <p>In implementing a two-tiered policy approach based on primary and secondary frontages, whilst enabling flexibility for a retail-led mix of uses in primary frontages, this approach is consistent with the NPPF. However, there is concern that adopting an approach of full policy flexibility in secondary frontages could potentially undermine the overall retail function of the primary shopping area. Whilst it is likely that this approach would lead to a greater variety of town centre uses, in failing to protect a retail element within secondary frontages, there is risk that the overall vitality and viability of the town centre would be eroded. In light of these concerns, it is considered important that an element of planning control is retained, and Option 4 is not therefore considered to represent the most sustainable policy approach.</p> <p>SA Objectives scoped out: Objective 1: Minimise climate change – it is not considered that small scale town centre change of use applications will impact on climate change.</p> <p>Objective 2: Adapt to climate change - – it is not considered that small scale town centre change of use applications will impact on climate change.</p> <p>Objective 6 conserve/enhance biodiversity habitats – no allocations are proposed within or adjacent to biodiversity habitats.</p>		
<p>Option 5: Increased Primary Frontage Flexibility, Significant Secondary Flexibility</p>	<p>3. Protect/enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home. 5. Maintain/ support employment base 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Promote healthy, active, cohesive and</p>	<p>+? + +? ++ ++ +</p>	

	socially sustainable communities 10. Participate in sport/ health	+?	
<p>Commentary: This approach would involve the implementation of a two-tiered retail frontage policy requiring the designation of primary and secondary frontages.</p> <p>Rather than relying on a percentage based approach to determining planning applications for non-retail uses, this approach would set out clear guidelines as to the uses that are acceptable in primary frontages (A1, A2, A3), though would not place limits restricting the proportion of non-retail uses allowed on a given frontage. For secondary frontages, greater policy flexibility is afforded to encourage a full range of appropriate town centre uses.</p> <p>There is risk that in implementing a highly flexible policy approach, Option 5 removes the Local Planning Authority's ability to manage changes of use, potentially resulting in the loss of a retail concentration within the Primary Shopping Area. The loss of a retail core would undermine consumer choice, and could in turn, impact negatively on the vitality and viability of the town centre, both of which would be contrary to NPPF objectives. For this reason, it is considered that Option 5 would not represent a sustainable policy approach.</p> <p>SA Objectives scoped out: Objective 1: Minimise climate change – it is not considered that small scale town centre change of use applications will impact on climate change.</p> <p>Objective 2: Adapt to climate change - – it is not considered that small scale town centre change of use applications will impact on climate change.</p> <p>Objective 6 conserve/enhance biodiversity habitats – no allocations are proposed within or adjacent to biodiversity habitats.</p>			

Policy EC5: Non-Central Retail Development			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 2: Develop a local plan policy to support the town centre first approach and interpretation of NPPF retail policy at the local level. Although it is recognised that in promoting the town centre first approach, Option 1 represents a sustainable option, it is considered that Option 2 enables greater scope for local policy interpretation, thereby creating further opportunities to promote the concepts of sustainable development. Option 2 is therefore considered to represent the most sustainable approach.		
Option 1: Rely on the NPPF to promote the town centre first approach.	1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home. 5. Maintain/ support employment base 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy active cohesive communities	+ + + + ++ + + +	
<p>Commentary: Option 1 would rely on the NPPF to promote the retail policy objectives of the town centre first approach. Whilst this approach would enable the local planning authority to draw upon national policy to direct retail development to the most sustainable locations, it would not enable NPPF policy to be expanded upon at the local level. In particular, a locally specific policy would provide scope to establish a preferred hierarchy to assist in the identification of sustainable and sequentially preferable sites, and would encourage the appropriate development of identified town centre, edge-of-centre, and neighbourhood centre sites. As such, although Option 1 represents a sustainable approach, the greater scope for local policy interpretation provided by Option 2 is considered to represent a more sustainable approach.</p> <p>Objectives scoped out: 6 and 10 - it is not considered that the above option would impact on these objectives.</p>			
Option 2: Develop a local plan policy to support the town centre first	1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 4. Ensure everyone has the opportunity to	++ + ++ ++	

approach and interpretation of NPPF retail policy at the local level.	live in a decent and affordable home.		
	5. Maintain/ support employment base	++	
	7. Reduce car journeys	++	
	8. Ensure the provision of sufficient infrastructure	+	
	9. Healthy active cohesive communities	++	
<p>Commentary: Option 2 would take the form of a locally specific policy that builds upon the town centre first approach of the NPPF having regard to local circumstance.</p> <p>The approach would enable the local plan to interpret NPPF policy through identifying a preferred hierarchy of locations for retail development, cross-referencing other local plan policies as relevant. In doing so, this approach will support the promotion of a vital and viable town centre, whilst encouraging the development of identified edge-of-centre locations, and enabling small-scale increases to neighbourhood centre retail offer where appropriate.</p> <p>In directing retail development to sustainable town centre, edge-of-centre (as part of a mixed-use), and neighbourhood centre locations, Option 2 actively promotes the principles of sustainable development, particularly in terms of reducing car journeys, promoting healthy active communities, and minimising climate change.</p> <p>For these reasons, Option 2 is considered to represent the most sustainable policy approach.</p> <p>Objectives scoped out: 6 and 10 - it is not considered that the above option would impact on these objectives.</p>			

Policy EC6: Manor Royal Masterplan & Spatial Strategy			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 1 has been chosen to drive improvements to the build environment (SA Objective 3) and maximise the performance of the Crawley economy (SA Objective 5). This may have a negative impact on car journeys to areas like the Manor Royal (SA objective 7). The key justification for choosing this option is to protect the business function of Manor Royal, a key economic driver in the Gatwick sub-region, and to protect the ambitions for the town centre and meet with the requests of the businesses in the Borough.		
Option 1: Manor Royal as the first choice location for business (i.e. no sequential test for B1: Office, high landscaping design for key frontages and gateway sites and no retail over 300sqm) and leisure restricted to protect the business function of the estate.	1. To minimise climate change	?	
	2. To adapt to climate change	+?	
	3. Protect/ enhance built environment	+	
	5. Maintain/ support employment base	+	
	6. Conserve/ enhance biodiversity habitats	+?	
	7. Reduce car journeys	?	
	8. Ensure the provision of sufficient infrastructure	?	
	10. Participate in sport/ health	+	
<p>Commentary</p> <p>SA objectives scoped out:</p> <p>4. Decent affordable homes – Manor Royal specific policies are not considered to have a direct impact on decent affordable homes.</p> <p>9. Healthy active cohesive communities – Manor Royal specific policy is not considered to impact the cohesion of communities directly.</p> <p>Enhancement of Manor Royal as a business location will not necessarily create a net impact on climate change, but this is uncertain (SA objective 1). Introduction of new green landscaping should help enhance adaptability of the estate to climate change (SA objective 2), as well as enhance the built environment (SA objective 3), and help create new habitat areas (SA objective 6). An enhanced built environment should strengthen the economy (SA objective 5). An uncertain effect on car journeys will be created because there is no reliable way to predict the net impact (SA objective 7). There will be an uncertain effect on infrastructure if vacancies fall, but it is expected that the predicted economic growth can be accommodated within the existing infrastructure (SA objective 8), although this may not be optimal. Ancillary leisure provision should help workers lead active lifestyles (SA objective 10).</p>			

<p>Option 2: Manor Royal as the first choice location for business (i.e. no sequential test for B1: Office, high landscaping design for key frontages and gateway sites, but no restrictions on retail and leisure.</p>	<p>1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 10. Participate in sport/ health</p>	<p>? +? + ? +? ? ? +?</p>	
<p>Commentary SA objectives scoped out: 4. Decent affordable homes – Manor Royal specific policies are not considered to have a direct impact on decent affordable homes. 9. Healthy active cohesive communities – Manor Royal specific policy is not considered to have an impact on the cohesion of communities directly. Enhancement of Manor Royal as a business location will not necessarily create a net impact on climate change, but this is uncertain (SA objective 1). Introduction of new green landscaping should help enhance adaptability of the estate to climate change (SA objective 2), as well as enhance the built environment (SA objective 3) and help create new habitat areas (SA objective 6). There is an uncertain effect on the Manor Royal from an enhanced retail and leisure offering within the Manor Royal, but this would undoubtedly create new jobs, just not in a way that meets with Manor Royal and Town Centre objectives (SA objective 5). An uncertain effect on car journeys will be created because there is no reliable way to predict the net impact of more leisure and less traditional business activity in the Manor Royal (SA objective 7). There will be an uncertain effect on infrastructure and this might be dependent on form of development (SA objective 8). There should be a positive impact on public health if leisure facilities are brought forward (SA Objective 10).</p>			
<p>Option 3: Manor Royal as the first choice for business (i.e. no sequential test for B1: Office but no restrictions on retail and leisure and no extra landscaping requirements for schemes in gateway sites and frontage locations.</p>	<p>1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 10. Participate in sport/ health</p>	<p>? -? -? -? -? ? ? +?</p>	
<p>Commentary SA objectives scoped out: 4. Decent affordable homes – Manor Royal specific policies are not considered to have a direct impact on decent affordable homes. 9. Healthy active cohesive communities – Manor Royal specific policy is not considered to have an impact on the cohesion of communities directly. A lack of environmental improvements will have an uncertain impact on climate change minimisation and adaptation, because the economy might not perform well (SA objectives 1 & 2) which could lead to a lack of environmental improvements to the built environment (SA objective 3) or the creation new habitat areas (SA objective 6). There is an uncertain effect on Manor Royal from enhanced retail and leisure in Manor Royal, but this undoubtedly creates new jobs, just not in a way that meets with Manor Royal and Town Centre objectives (SA objective 5). An uncertain effect on car journeys will be created because there is no reliable way to predict the impact of more leisure and less traditional business activity in Manor Royal (SA objective 7). There will be an uncertain effect on infrastructure and this might be dependent on the form of the development (SA objective 8). There should be a positive impact on public health if leisure facilities are brought forward (SA Objective 10).</p>			
<p>Option 4: Do nothing, instead relying on the NPPF. This means no protection of employment sites against alternative</p>	<p>1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient</p>	<p>? ? ? -? -? / -?</p>	

uses and for office development to be redirected to the town centre.	infrastructure 10. Participate in sport/ health	/	
	<p>Commentary SA objectives scoped out: 4. Decent affordable homes – Manor Royal specific policies are not considered to have a direct impact on decent affordable homes.</p> <p>9. Healthy active cohesive communities – Manor Royal specific policy is not considered to have an impact on the cohesion of communities directly.</p> <p>A lack of environmental improvements will have an uncertain impact on climate change minimisation and adaptation, because the economy might not perform well (SA objectives 1 & 2), which could lead to a lack of environmental improvements to the built environment (SA objective 3) or help create new habitat areas (SA objective 6). There is an uncertain effect on Manor Royal from enhanced retail and leisure offering within the Manor Royal, but this will undoubtedly create new jobs, just not in a way that meets with the Manor Royal and Town Centre objectives. However, alternative uses such as residential, would reduce Crawley's capacity to contribute to the sub-regional economy (SA objective 5). An uncertain effect on car journeys will be created because there is no reliable way to predict the impact of more leisure and less traditional business activity, or any other alternative uses like residential in the Manor Royal (SA objective 7). There will be an uncertain effect on infrastructure and this might be dependent on what types of alternative uses develop in a non-protected environment (SA objective 8). There should be a positive impact on public health if leisure facilities are brought forward (SA Objective 10).</p>		

Policy EC7: Three Bridges Employment Corridor, Maidenbower Business Park, Tilgate Forest Business Centre and Broadfield Business Park			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 1 has been chosen because of the positive effects on the local economy. This option has been chosen in the context of limited land availability for new employment land and the need to keep Use Classes A and B within the Town Centre, to avoid the dilution of these small employment areas that support the wider economy.		
Option 1: Proactive – expand the employment area and restrict the loss of employment floorspace and restrict Use Classes A and D	1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 10. Participate in sport/ health	? ? ? + +? ? ? ?	
	<p>Commentary SA objectives scoped out: 4. Decent affordable homes – Manor Royal specific policies are not considered to have a direct impact on decent affordable homes.</p> <p>9. Healthy active cohesive communities – Manor Royal specific policy is not considered to have an impact on the cohesion of communities directly.</p> <p>Enhancement of supporting business estates will not necessarily create a net impact on, or help adapt to climate change, but this is uncertain (SA objective 1 and 2). There are no plans to intervene in the built environment or with the biodiversity habitats in these areas (SA objective 3 and 6) to create improvement so any change will be incremental and development funded. Protection of employment floorspace for the core employment generating elements of the local economy (SA objective 5). An uncertain effect on car journeys will be created because there is no reliable way to predict the net impact (SA objective 7). There will be an uncertain effect on infrastructure, but it is expected that predicted growth can be accommodated in the existing infrastructure (SA objective 8), although this may not be optimal. Ancillary leisure provision should help workers lead active lifestyles and through the restriction Use Class D, an optimal level to support employees' needs could be met (SA objective 10).</p>		
Option 2: Promote TBC1	1. To minimise climate change 2. To adapt to climate change	? ?	

<p>and TBC2 approach – proactive redevelopment of the area with option 1 for other areas (i.e. support their existing role)</p>	<p>3. Protect/ enhance built environment 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 10. Participate in sport/ health</p>	<p>+? +? +? ? ? ?</p>	
<p>Commentary</p> <p>4. Decent affordable homes – Manor Royal specific policies are not considered to have a direct impact on decent affordable homes.</p> <p>9. Healthy active cohesive communities – Manor Royal specific policy is not considered to have an impact on the cohesion of communities directly.</p> <p>Enhancement of the Three Bridges Corridor through mixed use redevelopment will not necessarily create a net impact on, or help adapt to climate change, but this is uncertain (SA objective 1 and 2). The built and natural environments may be improved through large scale developments but this has a degree of certainty surrounding it (SA objective 3 and 6). Protection of employment floorspace may be undermined if housing development replaces the existing floorspace offer (SA objective 5). An uncertain effect on car journeys will be created because there is no reliable way to predict the net impact, but some increase might be expected as redevelopment is likely to intensify uses. This issue will require monitoring of SA objective 7. There will be an uncertain effect on infrastructure, but it is expected that predicted economic growth can be accommodated in the existing infrastructure (SA objective 8), although this may not be optimal. The affect on sport and health is uncertain so this objective would need to be reconsidered in the context of specific development proposals (SA objective 10).</p> <p>The other employment areas have been considered and assessed as part of option 1.</p>			
<p>Option 3: Do nothing – unregulated approach (not stopping retail but retain an E3 type policy)</p>	<p>1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 10. Participate in sport/ health</p>	<p>? +? +? +? ? ? ? ?</p>	
<p>Commentary</p> <p>4. Decent affordable homes – Manor Royal specific policies are not considered to have a direct impact on decent affordable homes.</p> <p>9. Healthy active cohesive communities – Manor Royal specific policy is not considered to have an impact on the cohesion of communities directly.</p> <p>Retention of the existing policy framework will not necessarily create a net impact on, or help adapt to climate change, but this is uncertain (SA objective 1 and 2). The built and natural environments would be likely to change incrementally over time, with uncertain effects on SA objectives 3 and 6. Protection of traditional employment floorspace may be supported by this policy approach, but opportunities to diversify the economy may be missed (SA objective 5). An uncertain effect on car journeys will be created because there is no reliable way to predict the net impact, but some increase might be expected if development proposals justify the replacement of employment floorspace. This issue will require monitoring of SA objective 7. There will be an uncertain effect on infrastructure, but it is expected that predicted growth can be accommodated in the existing infrastructure (SA objective 8), although this may not be optimal. The effect on sport and health is uncertain so this objective would need to be reconsidered in the context of specific development proposals (SA objective 10).</p>			
<p>Option 4: NPPF reliant, so no specific policy for Three Bridges Corridor or Tilgate Forest Business Centre and Broadfield Park (i.e. allowing</p>	<p>1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 10. Participate in sport/ health</p>	<p>? ? +? -? -? / -? ?</p>	

complete market flexibility)	<p>Commentary</p> <p>4. Decent affordable homes – Manor Royal specific policies are not considered to have a direct impact on decent affordable homes.</p> <p>9. Healthy active cohesive communities – Manor Royal specific policy is not considered to have an impact on the cohesion of communities directly.</p> <p>Use of NPPF policy would remove the protections for employment sites meaning they could change to non-employment generating uses (SA objective 5). The net impact on, positive adaptation to climate change, is uncertain (SA objective 1 and 2). The built and natural environments would be likely to change incrementally over time, with uncertain effects on SA objectives 3 and 6. Protection of traditional employment floorspace would not be supported by this policy approach, with uncertain effects on the local economy and floorspace offer (SA objective 5). An uncertain effect on car journeys will be created because there is no reliable way to predict the net impact, but some increase through site intensification should be expected. This issue will require monitoring of SA objective 7. There will be an uncertain effect on infrastructure, but it is expected that predicted economic growth can be accommodated in the existing infrastructure (SA objective 8), although this may not be optimal. Again this will be monitored in the context of specific applications. The affect on sport and health is uncertain so this objective would need to be reconsidered in the context of specific development proposals (SA objective 10).</p>
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Policy EC8: Leisure Proposals			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 2 was chosen.		
Option 1: Rely on the NPPF to steer leisure uses to the most sustainable locations.	1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 5. Maintain/ support employment base 6. Conserve/enhance biodiversity, landscape, flora/fauna. 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy active cohesive communities 10. Participate in sport/ health	-? -? ? ++ ? - + ++ ++	
	<p>Commentary: The Option 1 approach would be to rely on the NPPF to direct leisure uses to the most sustainable locations.</p> <p>NPPF paragraph 23 requires local plans to allocate a range of suitable sites to meet the scale and type of leisure needed in town centres, outlining that needs should be met in full and not be compromised by limited site availability. As a main town centre use, NPPF paragraph 24 requires that leisure uses should in the first instance be directed to the town centre sites as per the requirements of the sequential test.</p> <p>Although leisure uses should be directed to town centre locations, the limited availability of land in the town centre presents an obstacle to accommodating a full range of leisure facilities to meet the needs of Crawley and the wider sub-region. For this reason, Crawley has historically directed leisure uses to accessible sites elsewhere in the borough.</p> <p>Were the council to rely solely on the NPPF sequential test, there is risk that leisure uses could come forward in inappropriate locations, away from established leisure sites. Such an approach could be harmful in a Crawley context, with unplanned leisure development located away from established hubs increasing the need to travel and reducing the overall sustainability of the plan. For this reason it is considered that a more spatial approach would enable leisure development to be delivered in a more sustainable manner, and Option 1 is therefore dismissed.</p> <p>Objective scoped out: 4 - it is not considered that the above option would impact on these objectives.</p>		
Option 2: Bring forward a local plan policy to	1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment	+ ? +	

support interpretation of the NPPF to deliver leisure uses in the most sustainable locations.	5. Maintain/ support employment base	++	
	6. Conserve/enhance biodiversity, landscape, flora/fauna.	?	
	7. Reduce car journeys	++	
	8. Ensure the provision of sufficient infrastructure	+	
	9. Healthy active cohesive communities	++	
	10. Participate in sport/ health	++	
<p>Commentary: The Option 2 approach would be to develop a local plan policy to support interpretation of the NPPF and deliver leisure uses in the most sustainable locations.</p> <p>As required under the NPPF, Option 2 would seek to direct leisure development to the town centre. However, having regard to the established local context of non-central leisure hubs, it would also consider leisure development directed to identified non-central leisure locations to be equally appropriate. It is considered that the continued concentration of leisure facilities in established hubs continues to promote accessibility, linked trips, and wider concepts of sustainable development. For these reasons, Option 2 is therefore considered to represent the preferred approach.</p> <p>Objective scoped out: 4 - it is not considered that the above option would impact on these objectives.</p>			

Policy EC9: Neighbourhood Centres

This policy will set out the council's preferred approach to managing changes of use in Crawley's neighbourhood parades. The parades have historically served to provide a range of shops and supporting non-retail uses to meet the day-to-day needs of residents, though this function has evolved over time, and many parades now also accommodate a range of more specialist retailers and other services. The recent Issues and Options consultation has shown that residents continue to value the neighbourhood parades as convenient locations for the shops and services that meet everyday needs, whilst the low vacancy rate within the parades emphasises their popularity. The challenge for planning policy is therefore to ensure that a balance continues to be struck between retaining shops and local services, whilst allowing flexibility for other retail-supporting uses to locate in the parades. Three policy options have been considered:

1. Low Flexibility: Implement a percentage based approach whereby a maximum non-retail threshold is identified to determine the proportion of non-retail uses permitted in neighbourhood parades.
2. Moderate Flexibility: Retain an approach similar to the current Local Plan (2000), whereby a change of use application is considered on its individual merits, having regard to the overall impact that the proposal would have on the parade's overall ability to meet the everyday needs of residents.
3. High Flexibility: Implement a highly flexible approach with minimal policy restriction, effectively allowing the market to determine the types of use that are allowed to locate in the parades.

Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>Option 2: Moderate Flexibility is the preferred policy approach.</p> <p>The neighbourhood centres are valued by residents and continue to perform an important function in meeting the day-to-day needs of local people. But it is recognised that the role of the parades is not limited solely to a convenience function, and the shops also accommodate specialist retailers in addition to other non-retail uses that support local needs. As such, the key objective of a neighbourhood parade policy will be to retain the balance between meeting local needs whilst providing flexibility for other appropriate uses.</p> <p>It is considered that the approach set out under Option 1 is too prescriptive, particularly for smaller parades. It is felt that a 'blanket' approach fails to recognise the individual circumstances of each parade, and through failing to afford sufficient flexibility, potentially increases vacancies and stifles the operation of centres that are currently operating in a vital and viable manner. By way of contrast, Option 3 affords too great a level of flexibility, and in doing so potentially undermines the primary retail function of the parades, increasing the need to travel to access day-to-day services and top-up convenience retail. Option 1 and 3 are not therefore considered to represent the most sustainable policy approaches, and are dismissed.</p> <p>As such, Option 2 is considered to represent the most appropriate balance, allowing flexibility for a range of retail and non-retail uses, whilst enabling the Local Planning Authority to assess the potential impact of any proposals on a parade by parade basis, having full regard to local circumstance. In doing so, the approach promotes a mix of uses in a sustainable neighbourhood parade location, and Option 2 is therefore the preferred approach.</p>		

<p>Option 1: Low Flexibility: A percentage based approach to determine the proportion of non-retail uses permitted in neighbourhood parades.</p>	<ol style="list-style-type: none"> 1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home. 5. Maintain/ support employment base 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Promote healthy, active, cohesive and socially sustainable communities 	<p style="text-align: center;">- - ? ? -? - - -</p>	
<p>Commentary: This option would involve implementation of a percentage based approach similar to that employed in the Town Centre Wide Supplementary Planning Document. Policy would seek to retain a balance between retail and non-retail uses in neighbourhood parades by allowing non-retail uses to take up no more than 50% frontage length of any one parade. The policy would broadly seek to limit non-retail uses to use classes A2, A3, or A5, though other uses that would support a local shopping trip will also be considered.</p> <p>Although the approach set out under Option 1 would help retain a retail focus at parades, there is risk that the approach is too prescriptive. This is particularly likely to be the case in smaller parades, where a single convenience retailer acts as a main anchor store, supported by non-retail uses. In such cases, the approach is likely to be too inflexible, potentially increasing vacancies and stifling the operation of a centre that is currently operating in a vital and viable manner. By inflexibly restricting the number of non-retail uses, there is risk that the approach may prevent non-retail uses which would otherwise be used by local residents from locating within a sustainable neighbourhood parade location, potentially increasing the need to travel by private car.</p> <p>Objective scoped out: Objective 10. Participate in sport/health – small scale changes of use at local neighbourhood centres will not impact upon delivery of this objective.</p>			
<p>Option 2: Moderate Flexibility: Change of use applications considered on individual merits having regard to the impact that a proposal would have on the parade's ability to meet the everyday needs of residents.</p>	<ol style="list-style-type: none"> 1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home. 5. Maintain/ support employment base 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Promote healthy, active, cohesive and socially sustainable communities 	<p style="text-align: center;">+ + + ? + - - -</p>	
<p>Commentary: This option would retain an approach similar to that employed in the current Local Plan (2000). Rather than identifying a maximum threshold of non-retail that would be permitted, flexibility is applied to enable the Local Planning Authority to consider the impacts of a proposal on its individual merits, allowing a view to be taken as to the overall impact on the ability of the parade to meet the everyday needs of residents. As with Option 1, the policy would broadly seek to limit non-retail uses to use classes A2, A3, or A5, though other uses that would support a local shopping trip will also be considered.</p> <p>It is considered that this approach has worked well in Crawley for a number of years, providing flexibility for a range of uses whilst enabling an overall balance to be retained between retail and non-retail uses. The success of the approach is reflected in the low vacancy rates of neighbourhood centres, and it is evident from the Issues and Options consultation that parades are well used by residents. By continuing to provide a range of uses in an accessible location, it is considered that the Option 2 approach represents a sustainable and pragmatic means of determining applications for neighbourhood parade change of use.</p> <p>Objective scoped out: Objective 10. Participate in sport/health – small scale changes of use at local neighbourhood centres will not impact upon delivery of this objective.</p>			
<p>Option 3: High Flexibility: Implement a highly flexible approach with minimal policy restriction.</p>	<ol style="list-style-type: none"> 1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home. 5. Maintain/ support employment base 7. Reduce car journeys 	<p style="text-align: center;">- - ? ? -? -</p>	

	8. Ensure the provision of sufficient infrastructure 9. Promote healthy, active, cohesive and socially sustainable communities	- -	
	<p>Commentary: This option would take a highly flexible approach, not placing any restriction on the proportion of non-retail uses locating in neighbourhood centres. Although the policy would broadly seek to limit non-retail uses to use classes A2, A3, or A5, other uses that would support a local shopping trip will also be considered. However, there remains significant risk that in affording too great a level of flexibility, the primary retail function of the parades may be eroded over time. Were this to be lost, residents would likely need to travel further to access the day-to-day services that are currently provided locally, potentially conflicting with the wider principles of sustainable development.</p> <p>Objective scoped out: Objective 10. Participate in sport/health – small scale changes of use at local neighbourhood centres will not impact upon delivery of this objective.</p>		

Policy EC10: Farm Diversification			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	The chosen option and resulting policy is in line with the NPPF, as it sets out a policy approach to farm diversification that is supportive, whilst ensuring that such development respects its rural location.		
Option 1: encourage farm shops in keeping with the landscape character of its location and requiring goods to be primarily produced on the holding or neighbouring holdings.	1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. To promote healthy, active, cohesive and socially sustainable communities. 10. Participate in sport/ health	+ 0 + ++ 0 - 0 + 0	Locate close to residential areas
	<p>Commentary This option encourages farm shops in the countryside which is supported in National Policy but seeks to avoid farm shops which are not related to the farm or neighbouring farm on which its is proposed.</p>		
Option 2 Generally encourage farm shops.	1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. To promote healthy, active, cohesive and socially sustainable communities. 10. Participate in sport/ health	- - 0 + 0 - 0 0 0	Restrict size and need for goods to be produced locally Restrict size, locate closer to residents
	<p>Commentary This policy approach would be generally encouraging food shops in rural areas which may have harmful impacts on rural areas from transport movements and also risk these activities taking precedence over farming itself.</p>		

Housing

Policy H1: Housing Provision			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 5: A supply-led housing figure is recommended in view of the constrained nature of the Borough in terms of land supply. It is considered that annual provision above these levels could not be sustained over the plan period, as informed by the Council's urban capacity		

	work.		
Option 1: Demographic-led locally determined housing requirement (542 dwellings p.a) These figures to be revised early 2013 with 2011 Census Data.	2. To adapt to climate change, i.e. reduction of flood risk, water resource management 3. Protect/enhance built environment 4. Everyone has opportunity to live in a decent and affordable home 5. Maintain/support employment base 6. Conserve/ enhance biodiversity habitats 7. Reduce car journeys, sufficient transport infrastructure 9. Promote healthy, active and cohesive communities	- -- + - -- - ?	
	<p>Commentary A demographic-led housing figure would have the most positive impact on sustainability objective 4, ensuring everyone has the opportunity to live in a decent and affordable home. However, it would have a significant negative impact on SA objectives 3 and 6 in view of the amount and nature of land that would have to be developed to provide housing at this level over the plan period.</p> <p>SA objectives 1 and 8 and 10 were ruled out on the basis that they are not specifically related to overall levels of housing provision.</p>		
Option 2: Economy-led locally determined housing requirement (350 dwellings p.a.) (assumes hybrid economic growth and job growth of 200 per annum, post 2016) (These figures to be revised with outputs of revised ELR, early 2013).	2. To adapt to climate change, i.e. reduction of flood risk, water resource management 3. Protect/enhance built environment 4. Everyone has opportunity to live in a decent and affordable home 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 7. Reduce car journeys, sufficient transport infrastructure 9. Promote healthy, active and cohesive communities	? - - ++ - - ?	
	<p>Commentary An economic-led housing figure would have the most positive impact on sustainability objective 5, maintaining and supporting a diverse employment base to serve the local and sub-regional and regional economy. However, it would have a negative impact on SA objectives 3, protection and enhancement of the built environment and character, Objective 6, conservation and enhancement of biodiversity and Objective 7, reducing car journeys and promoting sustainable transport, particularly in respect of additional job growth, post 2016.</p> <p>SA objectives 1 and 8 and 10 were ruled out on the basis that they are not specifically related to overall levels of housing provision.</p>		
Option 3: Affordable-housing needs locally determined housing requirement (minimum of 510 dwellings per annum). These figures to be revised early 2013 with data from updated SHMA.	2. To adapt to climate change, i.e. reduction of flood risk, water resource management 3. Protect/enhance built environment 4. Everyone has opportunity to live in a decent and affordable home 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 7. Reduce car journeys, sufficient transport infrastructure 9. Promote healthy, active and cohesive communities	-- -- ++ - -- -- ?	
	<p>Commentary An affordable housing based figure would have the most positive impact on sustainability objective 4, ensuring everyone has the opportunity to live in a decent and affordable home in terms of meeting the housing needs of the Borough as identified through the SHMA. However, it would have a significant negative impact on SA Objective 2, adaptation to climate change, Objective 3, protection and enhancement of the built environment, Objective 6, conservation and enhancement of biodiversity and Objective 7, reducing car journeys and promoting sustainable transport, in terms of the amount of housing required over the plan period to fully meet affordable housing needs.</p> <p>SA objectives 1 and 8 and 10 were ruled out on the basis that they are not specifically related to overall levels of housing provision.</p>		
Option 4: Continuation of	2. To adapt to climate change, i.e. reduction of flood risk, water resource management	-	

South East Plan requirement over plan period (375 dwellings p.a.)	3. Protect/enhance built environment	--	
	4. Everyone has opportunity to live in a decent and affordable home	-	
	5. Maintain/ support employment base	+?	
	6. Conserve/ enhance biodiversity habitats	--	
	7. Reduce car journeys, sufficient transport infrastructure	--	
	9. Promote healthy, active and cohesive communities	?	
<p>Commentary</p> <p>The continuation of South East Plan housing requirements over the plan period would have no positive impact on any of the relevant SA objectives other than objective 5, relating to the maintenance and support of the Borough's employment base. In view of constraints on land supply in the Borough, building housing at previous levels would be difficult to sustain without significant negative impact on the quality of the built and natural environment. This would have a significant negative impact therefore on SA objective 3 (Protection and Enhancement of the Built Environment), Objective 6 (Conservation and Enhancement of Biodiversity) and Objective 7 (Reduction in car journeys and provision of sufficient transport infrastructure).</p> <p>SA objectives 1 and 8 and 10 were ruled out on the basis that they are not specifically related to overall levels of housing provision.</p>			
Option 5: 'Supply-led' locally determined housing requirement (minimum of 250 dwellings p.a. over period 2014-2019).	2. To adapt to climate change, i.e. reduction of flood risk, water resource management	+	
	3. Protect/enhance built environment	+	
	4. Everyone has opportunity to live in a decent and affordable home	-	
	5. Maintain/ support employment base	+	
	6. Conserve/ enhance biodiversity habitats	+	
	7. Reduce car journeys, sufficient transport infrastructure	+	
	9. Promote healthy, active and cohesive communities	+	
<p>Commentary</p> <p>A supply-led housing figure is recommended in view of the constrained nature of the Borough in terms of land supply. It is considered that annual provision above these levels could not be sustained over the plan period, as informed by the Council's urban capacity work. However, it is acknowledged that such an approach, which involves providing housing at levels significantly below demographic requirements, will have a negative impact on Sustainability Objective 4, to ensure everyone has the opportunity to live in a decent and affordable home. The impact on Sustainability Objectives 2, 3, 6, and 7 are deemed to be positive, in terms of impact on the natural and built environment including water resource management and transport infrastructure.</p> <p>Mitigation of negative impact on SA 4 (Opportunity to live in a decent and affordable home) required.</p>			

Policy H2: Key Housing Sites			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 2: A policy which identifies a number of strategic, medium and small sites to meet the supply-led housing requirement identified in Policy H1 is required to demonstrate how this figure can be delivered over the plan period to 2029. Para 47 of the NPPF identifies that local plans should identify key sites which are critical to the delivery of their housing requirement. A supply of specific, 'developable' housing sites or broad locations for growth, for years 6-10, should also be identified and where possible, for years 11-15.		
Option 1: Not identifying strategic, medium and small housing sites to meet Crawley's housing needs.	2. To adapt to climate change, i.e. reduction of flood risk, water resource management	-	
	3. Protect/enhance built environment	-	
	6. Conserve/ enhance biodiversity habitats	-	
	7. Reduce car journeys, sufficient transport infrastructure	-	
	8. Provision of sufficient infrastructure to meet the requirements of the borough.	-	

	9. Promote healthy, active and mixed communities	-	
	<p>Commentary Allowing the market to determine the location of future housing development without any guidance from the local plan in terms of the most (and least) appropriate locations would have a negative impact on each of the relevant sustainability objectives (2,3,6,7,8 and 9). This is largely because it would limit the control of the local planning authority to steer housing development towards the most appropriate locations and away from inappropriate locations such as flood zones, open space, Ancient Woodland and areas which are unrelated to the existing neighbourhood form and structure, such as outside the Built Up Area.</p> <p>SA objectives 1, 4, 5, and 10 were ruled out on the basis that they are not specifically related to the location of future housing development.</p>		
Option 2: Identify a series of strategic, medium and small housing sites to meet Crawley's housing requirements over the plan period (2014-2029).	2. To adapt to climate change, i.e. reduction of flood risk, water resource management 3. Protect/enhance built environment 6. Conserve/ enhance biodiversity habitats 7. Reduce car journeys, sufficient transport infrastructure 8. Provision of sufficient infrastructure to meet the requirements of the borough. 9. Promote healthy, active and mixed communities	+ + + + +	
	<p>Commentary The application of this policy will have a positive impact on SA Objective 2 in terms of adaptation to the effects of climate change particularly in respect of flooding and effective management of water resources, Objective 3 (Protection and Enhancement of the Built Environment and Character), Objective 6 (Conservation and Enhancement of Biodiversity and Key Landscape Features) Objective 7 (Reduction in car journeys and promotion of sustainable methods of transport) and Objectives 8 and 9 to ensure the provision of sufficient infrastructure to meet the Borough's requirements and promotion of healthy, active and mixed communities.</p> <p>SA objectives 1, 4, 5, and 10 were ruled out on the basis that they are not specifically related to the location of future housing development.</p>		

Policy H3: Future Housing Mix			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 1: A policy on future housing mix is considered necessary to ensure that new housing development addresses local need (as evidenced by the Strategic Housing Market Assessment) and the Council plans for a mix of housing which is appropriate to the needs of the community, in terms of house type and size.		
Option 1: To provide an appropriate mix of dwelling types and sizes to address local housing needs.	4. Everyone has opportunity to live in a decent and affordable home 9. Promote healthy, active and cohesive communities	- +	
	<p>Commentary The application of such a policy, will have a significant positive impact on SA Objective 9 to promote mixed and balanced, more cohesive communities. The impact on SA 4 is also considered to be broadly positive in terms of increasing the opportunities for people to live in 'decent' homes which meet their lifestyle needs although it is recognised that this policy will not enable everyone to live in decent and affordable housing as identified in this objective.</p> <p>SA objectives 1,2,3,5,6,7,8 and 10 were ruled out on the basis that they are not specifically related to future housing mix.</p>		
Option 2: Allow market determination of appropriate future housing mix.	4. Everyone has opportunity to live in a decent and affordable home 9. Promote healthy, active and cohesive communities	-- --	
	<p>Commentary Allowing the housing market to determine the appropriate future mix of housing in terms of dwelling type and size, would have a significant negative impact on future housing supply</p>		

	and is likely to lead to a mismatch between identified housing need (through the SHMA) and the housebuilding industry's interpretation of need in terms of house type and size. This would have a significant negative impact on SA Objectives 4 and 9 and would not assist in extending the opportunity for people to live in decent homes which meet their lifestyle needs. It would also undermine SA Objective 9 by failing to provide a broader mix of housing which may facilitates mixed and balanced, more cohesive communities.
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Policy H4: Affordable Housing			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	A preferred option has not yet been chosen. This is awaiting responses from the preferred strategy consultation and further evidence through a viability assessment.		
Option 1: 40%; 15 dwellings	1. minimise climate change 2. adapt to climate change 3. protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. conserve/enhance biodiversity and landscape 7. promote sustainable journeys 8. provide sufficient infrastructure 9. promote sustainable communities 10. encourage active lifestyles	0 0 0 + 0 0 0 0 + 0	
	Commentary Objectives 4 and 9 are considered the most relevant of the sustainability objectives with regards to this policy area. For this option, a positive impact is considered likely for both of these objectives as the Strategic Housing Market Assessment has shown a need for the provision of affordable housing would be supported by a level of provision at 40% or more through the Local Plan. This would also ensure mixed communities and good standards of development through integration of the affordable housing requirement as a clear element of the design scheme from the start. However, this is tempered with both the restrictions to just meeting the needs of those considered to be within the reasonable preference for need and would not support the provision of other types of need such as low cost market housing – potentially increasing the gap between those who can afford to take a first step onto the housing market ladder and those restricted to the rental market. In addition, the restriction of application of the policy to developments of 15 dwellings or more could limit the actual amount of affordable housing provided within the borough, particularly in the latter part of the Plan when the larger sites have been completed and the housing provision is limited to small windfall sites. The level of provision at 40% could also restrict the viability of developments and potentially reduce the overall new housing stock coming forward, and in itself could result in schemes proposing less than 15 dwellings to avoid the application of the policy.		
Option 2: 40% sliding scale	1. minimise climate change 2. adapt to climate change 3. protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. conserve/enhance biodiversity and landscape 7. promote sustainable journeys 8. provide sufficient infrastructure 9. promote sustainable communities 10. encourage active lifestyles	0 0 0 ++ 0 0 0 0 ++ 0	
	Commentary As with Option 1, however, the sliding scale option would increase the affordable housing provision to apply to all new residential developments.		
Option 3: 30% + 10% Low Cost 15 dwellings	1. minimise climate change 2. adapt to climate change 3. protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. conserve/enhance biodiversity and	0 0 0 + 0 0	

	landscape 7. promote sustainable journeys 8. provide sufficient infrastructure 9. promote sustainable communities 10. encourage active lifestyles	0 0 ++ 0	
	Commentary As with Option 1, however, through the reduction of the affordable housing requirement to 30% it may be that some of the viability issues are reduced, and through the application of 10% Low Cost, the housing market offer is widened to increase opportunities for first time buyers. Therefore the effect on Objective 9 is considered to potentially be significant positive impact.		
Option 4: 30% + 10% sliding scale	1. minimise climate change 2. adapt to climate change 3. protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. conserve/enhance biodiversity and landscape 7. promote sustainable journeys 8. provide sufficient infrastructure 9. promote sustainable communities 10. encourage active lifestyles	0 0 0 ++ 0 0 0 ++ 0	
	Commentary As with Option 3, however, the sliding scale option would increase the affordable housing provision to apply to all new residential developments.		

Policy H5: Gypsy, Traveller and Travelling Showpeople Sites			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>There is not expected to be a different impact on the Sustainability Appraisal objectives if site provision comes forward either privately or publicly, so this option has been scoped out. The remaining issues relate to the criteria based policy approach, also scoped out because this is seen as a necessity to protect the residential part of Crawley and take account of the Crawley specific noise constraints on residential development. Also the provision of either full or partial site provision subject to land availability and an option where no site provision is provided in the event land availability becomes an issue.</p> <p>A more detailed appraisal will take place following completion of the needs assessment and a review of land availability.</p>		
Option 1: Criteria based policies specific to Gypsies, Travellers and Travelling Showpeople dealing with noise limiting exposure to noise (57 decibels for permanent sites, 60 decibels for long term temporary sites of up to one month and 66 decibels for temporary sites) and protecting local amenity (suitability of specific employment uses in residential areas) either as a separate policy or incorporated in the design and amenity policies; + Pitch provision to meet the full preference for site accommodation.	3. Built environment 4. Affordable homes 6. Conserve and enhance biodiversity habitats 9. Promote healthy active cohesive sustainable communities	? + ? ?	
	Commentary SA objectives 1 and 3, 5 and 8 have been assessed as having a neutral impact because of the small scale of the need/land take. Additionally, SA objectives 7 and 10 will have no net impact because the population is already located in Crawley and has access to the town and its facilities. The inclusion of caravan accommodation within the existing structure of the borough is likely to look different but not necessarily be damaging to the built environment. The provision of pitches to meet the preference in full would release an unknown number of affordable houses (uncertainty exists regarding the numbers of travellers living in social housing). The impact of full pitch provision may also impact the biodiversity in the borough if provided on certain sites. However, provision of pitches may result in the effective identification of a traveller community so far partially integrated into the settled community with uncertain effects on community cohesion.		
Option 2: Criteria based policies specific to Gypsies,	3. Built environment 4. Affordable homes	? +	

Travellers and Travelling Showpeople limiting exposure to noise (57 decibels for permanent sites, 60 decibels for long term temporary sites of up to one month and 66 decibels for temporary sites) and protecting local amenity (suitability of specific employment uses in residential areas) + Pitch provision to meet the partial preference for site accommodation (number to be specified subject to completion of land availability work).	6. Conserve and enhance biodiversity habitats	?	
	9. Promote healthy active cohesive sustainable communities	?	
<p>Commentary SA objectives 1 and 3, 5 and 8 have been assessed as having a neutral impact because of the small scale of the need/land take. Additionally, SA objectives 7 and 10 will have no net impact because the population is already located in Crawley and has access to the town and its facilities.</p> <p>The inclusion of caravan accommodation within the existing structure of the borough is likely to look different but not necessarily be damaging to the built environment. The provision of pitches to meet the preference in full would release an unknown number of affordable houses (uncertainty exists regarding the numbers of travellers living in social housing). The impact of full pitch provision may also impact the biodiversity in the borough if provided on certain sites. However, provision of pitches may result in the effective identification of a traveller community so far partially integrated into the settled community with uncertain effects on community cohesion.</p>			
Option 3: Criteria based policies specific to Gypsies, Travellers and Travelling Showpeople limiting exposure to noise (57 decibels for permanent sites, 60 decibels for long term temporary sites of up to one month and 66 decibels for temporary sites) and protecting local amenity (suitability of specific employment uses in residential areas) + No sites allocated.	3. Built environment	0	
	4. Affordable homes	0	
	6. Conserve and enhance biodiversity habitats	0	
	9. Promote healthy active cohesive sustainable communities	/	
<p>Commentary SA objectives 1 and 3, 5 and 8 have been assessed as having a neutral impact because of the small scale of the need/land take. Additionally, SA objectives 7 and 10 will have no net impact because the population is already located in Crawley and has access to the town and its facilities, there will be no change to the built environment, the provision of affordable housing, the conservation of biodiversity habitats.</p> <p>The continuation of a bricks and mortar housed Gypsy and Traveller community will not affect the built environment, but may affect the availability of some affordable homes if individuals were firstly in affordable housing and secondly were able to move to pitch provision. The impact on community cohesion is likely to remain constant.</p> <p>The impact of individuals living in bricks and mortar accommodation is uncertain.</p>			
Option 4: Do nothing which means no specific criteria based policies, and the NPPF/ Planning Policy for Travellers, relying instead on general design and amenity policies and no site provision.	9. Promote healthy active and cohesive sustainable communities	?	
	<p>Commentary Maintenance of the current housing provision and reliance on national policy would not impact the Sustainability objectives, except potentially objective 9 as detailed below.</p> <p>A reliance on National Policy may potentially result in difficulties enforcing the strict limits on exposure to noise affecting the health of future residents. The limits are specific to the nature of Crawley. A lack of site allocation will have an uncertain impact on individuals living in bricks and mortar accommodation potentially having a negative impact, but one that is no worse than the existing situation.</p>		

Policy H6: Shared Housing			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option:	Option 2: There is continued pressure for Houses in Multiple Occupancy in Crawley which provide an important source of housing supply. However, a large number of HMO's in one area can change the physical character of that area and can lead to conflict with the existing community. Tenants equally can suffer from poor conditions and mismanagement of		

	properties. Appropriate measures, largely through the application of planning policy, are considered necessary to ensure that Houses in Multiple Occupancy are appropriately planned in terms of their location, design and layout and that their occupation does not create significant adverse impact on the character of the area and amenity and privacy of neighbouring properties.		
Option 1: No restriction on HMO's in terms of layout and design, impact on neighbouring amenity.	4 – Everyone has opportunity to live in a decent and affordable home	--	
	9 – Promotion of Healthy, Active, Cohesive and Mixed Communities	--	
	Commentary Not applying any restrictions on appropriate design, layout and location of HMO's would lead to unsatisfactory standards of accommodation for many occupiers and lead to a detrimental effect on the amenity of adjoining residents in terms of noise and disturbance. Planning policy control is widely considered necessary in Crawley to ensure that these properties, whilst an important contribution towards supply overall, do not significantly affect the character of an area and amenity of tenants and neighbours alike.		
Option 2: To restrict HMOs by criteria based on appropriate location, design and layout, impact on neighbouring amenity and privacy.	4 – Everyone has opportunity to live in a decent and affordable home	+	
	9 – Promotion of Healthy, Active, Cohesive and Mixed Communities	+	
	Commentary The application of this policy will have a marginal positive impact on SA Objective 4 (Ensure everyone has the opportunity to live in a decent and affordable home) and 9 (Promotion of Healthy, Active, Cohesive and Mixed Communities). SA objectives 1, 2, 3, 5, 6, 7, 8 and 10 were ruled out on the basis that they are not specifically related to the provision of shared accommodation.		
Option 3: should HMOs be restricted by location/ concentration?	Option currently being explored		
	Commentary		
Option 4: should HMOs be encouraged in certain areas?	Option currently being explored		
	Commentary		
Option 5: should HMOs be restricted by criteria?	Option currently being explored		
	Commentary		

Environment

Policy ENV1: Climate Change Mitigation and Adaptation			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 2: Whilst all options produced relatively positive impacts on the sustainability objectives, it was considered that producing local guidance that relates to local opportunities and specified targets would have greater benefits by making the Local Plan more locally distinctive.		
Option 1: To set new local targets across the board for all development and in all areas that exceed national targets	1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. To promote healthy, active, cohesive and socially sustainable communities. 10. Participate in sport/ health	++ ++ +? 0 ++ +? +? ++ +	

	Commentary This option would require all development in all locations to meet a specified target of carbon reductions over and above national requirements. This could set stringent targets which penalise developments or make Crawley an unattractive place to develop, although it could set about greater efficiencies in reducing CO2 emissions. The factors 5 and 7 may be effected with less development occurring.		
Option 2: Above National where appropriate both geographically and scale of development	1. To minimise climate change	++	
	2. To adapt to climate change	++	
3. Protect/ enhance built environment	++		
5. Maintain/ support employment base	+		
6. Conserve/ enhance biodiversity habitats	++		
7. Reduce car journeys	+		
8. Ensure the provision of sufficient infrastructure	+?		
9. To promote healthy, active, cohesive and socially sustainable communities.	+?		
10. Participate in sport/ health	+		
Commentary By targeting the types of development where higher targets can be justified and achieved, as well as the geographical areas that there are opportunities to improve the development impact on climate change, sustainable development in sustainable locations can be developed. This approach also allows locally specific targets and issues to be addressed rather than a blanket approach to all development. This allows further assistance from the LA to developers rather than being inflexible in our approach.			
Option 3: Same as National	1. To minimise climate change	+	
	2. To adapt to climate change	+	
	3. Protect/ enhance built environment	+? Positive impact	
	4. To have an affordable home	0	
	5. Maintain/ support employment base	+	
	6. Conserve/ enhance biodiversity habitats	+ ?	
	7. Reduce car journeys	0	
	8. Ensure the provision of sufficient infrastructure	0	
	9. To promote healthy, active, cohesive and socially sustainable communities.	+ ?	
	10. Participate in sport/ health	0	
Commentary By following national targets, opportunities to improve the carbon footprint of the town may be missed, especially as this applies a blanket approach to all development across the country rather than allowing any locally specific opportunities to be considered.			

Policy ENV2: Renewable and Low Carbon Energy Development			
Crawley is looking to be carbon neutral by 2050, in its drive to achieve this renewable and low carbon energy development will form a key factor as part of the wider picture. Two options have been identified: 1. To encourage renewable and low carbon development based on local information 2. Not to have a policy			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 1 has been chosen to be in conformity with the NPPF. It provides a locally relevant policy ensuring appropriate renewable and low carbon energy development are located in the most efficient places within the borough, whilst providing scope to ensure that developments are not restricted. This is in contrast to Option 2 that leaves a large amount of uncertainty and could lead to inappropriate and inefficient developments.		
Option 1: To encourage renewable and low carbon development based on local information	1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 4. To have an affordable home 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient	++ + ? 0 +? ? 0 ++	

	<p>infrastructure</p> <p>9. To promote healthy, active, cohesive and socially sustainable communities.</p> <p>10. Participate in sport/ health</p>	<p>+</p> <p>0</p>	
	<p>Commentary</p> <p>Introducing a policy to encourage renewable and low carbon generation, regardless of a desired need will ensure that the borough goes a long way towards its objective of being carbon neutral by 2050. The lack of a requirement to demonstrate demand, and that it will be approved if there are no adverse impacts that cannot be mitigated gives this form of development a strong footing within the borough. The policy will enable the different types of energy generation to be located in the most efficient areas. This will ensure the borough has sufficient infrastructure and tries to minimise climate change in the most appropriate way.</p>		
Option 2: Not to have a policy	<p>1. To minimise climate change</p> <p>2. To adapt to climate change</p> <p>3. Protect/ enhance built environment</p> <p>4. To have an affordable home</p> <p>5. Maintain/ support employment base</p> <p>6. Conserve/ enhance biodiversity habitats</p> <p>7. Reduce car journeys</p> <p>8. Ensure the provision of sufficient infrastructure</p> <p>9. To promote healthy, active, cohesive and socially sustainable communities.</p> <p>10. Participate in sport/ health</p>	<p>+</p> <p>+</p> <p>-</p> <p>0</p> <p>?</p> <p>?</p> <p>0</p> <p>?</p> <p>?</p> <p>0</p>	
	<p>Commentary</p> <p>By not having a policy, we would be relying on the NPPF. The NPPF puts the emphasis on the Local Authority to plan for the future renewable and low energy developments. By not planning for a “low-carbon future” there would be a degree of uncertainty, as developments would be market lead, in future development that could lead to inappropriate developments within the area.</p>		

Policy ENV3: District Energy Network Infrastructure Development

Due to the boroughs compact and urban character, there is potential for the development of District Energy Networks. This, when combined with the level of new development expected within the borough over the coming years means their implementation may be cost effective in the coming years. To aid the development of these networks, we have considered 3 options:

1. Have no policy & rely on NPPF
2. Include local plan policy with the council at the centre of network development.
3. Include local plan policy encouraging the market to deliver network development..

Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 2 has been chosen to be in conformity with national policy. If no policy (Option 1) were taken not only would we not be in conformity with national policy but it would hamper the council's efforts to create energy networks within the borough. Option 3 was seen as an unrealistic option due to the uncertainty that it may bring.		
Option 1: Have no policy & rely on NPPF	<p>1. To minimise climate change</p> <p>2. To adapt to climate change</p> <p>3. Protect/ enhance built environment</p> <p>4. To have an affordable home</p> <p>5. Maintain/ support employment base</p> <p>6. Conserve/ enhance biodiversity habitats</p> <p>7. Reduce car journeys</p> <p>8. Ensure the provision of sufficient infrastructure</p> <p>9. To promote healthy, active, cohesive and socially sustainable</p>	<p>+</p> <p>+</p> <p>?</p> <p>0</p> <p>?</p> <p>?</p> <p>?</p> <p>?</p> <p>?</p>	

	communities. 10. Participate in sport/ health	?	
	Commentary The NPPF asks for Local Authorities to “identify opportunities where development can draw its energy supply from decentralised, renewable or low carbon energy supply systems”. By not doing this the plan wouldn’t be in conformity with national policy and would result in little/no policy support for such developments leaving it for the market alone to provide.		
Option 2: Include local plan policy with the council at the centre of network development.	1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 4. To have an affordable home 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. To promote healthy, active, cohesive and socially sustainable communities. 10. Participate in sport/ health	++ + ? 0 +? 0 0 ++ +? 0	
	Commentary By providing a local policy encouraging the development of District Energy Networks and associated infrastructure, and by stating that the council will take a central role in achieving this, a degree of certainty in achieving the objective is provided. This will also go a long way to establishing networks in the priority zones as identifies in the Local Plan.		
Option 3: Include local plan policy encouraging the market to deliver network development..	1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 4. To have an affordable home 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. To promote healthy, active, cohesive and socially sustainable communities. 10. Participate in sport/ health	++ + ? 0 +? 0 ? ? ? 0	
	Commentary The policy would achieve the development of networks but by placing the emphasis upon the private sector and the market to deliver energy networks there is uncertainty as to the timeframe that they may take to materialise.		

Policy ENV4: Development and Flood Risk			
National planning guidance requires that development proposals are directed to areas of lowest flood risk, and do not increase the risk of flooding elsewhere. To determine the approach applied to development and flood risk in Crawley over the plan period to 2029, two options have been considered:			
1. Do not include a policy relating to flood risk in the local plan, instead relying on the guidance of the National Planning Policy Framework to manage development and flood risk;			
2. Include a locally specific policy relating to development and flood risk in the local plan.			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 2 has been chosen, as this better enables flood risk to be dealt with in a locally specific manor. In particular, through providing a policy hook through which the recommendations of an updated SFRA and the Gatwick Sub-Regional Water Cycle Study can be implemented, the option delivers positive sustainability impacts against objectives 2, 3, 6, 8, and 9.		
Option 1: Rely on	2. To adapt to climate change	+	

national planning guidance.	3. Protect/ enhance built environment 4. To have an affordable home 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 8. Ensure the provision of sufficient infrastructure 9. To promote healthy, active, cohesive and socially sustainable communities.	+ ? ? + 0 +	
<p>Commentary: Under Option 1, the council would rely on the National Planning Policy Framework as the principal policy mechanism to manage the relationship between development and flood risk. A Strategic Flood Risk Assessment would be utilised to interpret national guidance at the local level, delineating areas of flood risk and outlining recommendations to minimise flood risk to property.</p> <p>Adopting this approach would avoid the repetition of national guidance, though would not enable evidence base work, in particular recommendations of an updated Strategic Flood Risk Assessment and the Gatwick Sub-Regional Water Cycle Study, to be factored into a locally specific policy. By failing to translate evidence base recommendations into policy, there is significant risk that opportunities to deliver the most sustainable forms of development will be missed.</p> <p>Objective scoped out: Option 1. To minimise climate change: The absence of a flood risk policy in the local plan will not impact upon objectives to minimise climate change, though may affect the scope for sustainable planning to minimise the risk of its impacts.</p> <p>Option 7. Reduce car journeys: The objective to achieve a reduction in car journeys is not specifically related to the presence or absence of a local flood risk policy.</p> <p>Option 10. Participate in sport/ health: The objective to achieve participation in sport/improved health is not specifically related to the presence or absence of a local flood risk policy.</p>			
Option 2: Include a locally specific flood risk policy.	2. To adapt to climate change 3. Protect/ enhance built environment 4. To have an affordable home 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 8. Ensure the provision of sufficient infrastructure 9. To promote healthy, active, cohesive and socially sustainable communities.	++ ++ ? ? ++ + +	
<p>Commentary: Under Option 2, the council would implement a locally specific policy to ensure that development is not placed at an unacceptable risk of flooding and does not increase flood risk elsewhere. The approach would ensure that development proposals are brought forward in a manner that reflects locally specific evidence base as well as national policy requirements. Specifically, a local plan approach would act as a policy 'hook' through which the recommendations of an updated Strategic Flood Risk Assessment, and the Gatwick Sub-Regional Water Cycle Study (particularly in terms of requiring Sustainable Urban Drainage Systems to offset any increase in flood risk from development) could be implemented. This would arguably result in the delivery of a more sustainable approach to managing flood risk, particularly in terms of meeting objectives 2, 3, and 6.</p> <p>Objective scoped out: Option 1. To minimise climate change: An Option 2 approach will not impact upon objectives to minimise climate change, though will influence sustainable planning that adapts to its impacts.</p> <p>Option 7. Reduce car journeys: The objective to achieve a reduction in car journeys is not specifically related to the presence or absence of a local flood risk policy.</p> <p>Option 10. Participate in sport/ health: The objective to achieve participation in sport/improved health is not specifically related to the presence or absence of a local flood risk policy.</p>			

Policy ENV5: Development and Heatwave Risk			
<p>Due to the changing climate, heatwave events are expected to become more severe, and more frequent. Crawley is expected to suffer from the urban heat island effect whereby the urban area is warmer than the surrounding area. It is therefore prudent to address this issue and three options have been looked at:</p> <ol style="list-style-type: none"> 1. Have no policy. 2. Have policy that applies a different requirement to different developments 3. Have policy that applies a universal requirement across all developments. 			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 2 has been chosen as it scores much better than Option 1, and removes the possible burden that Option 2 could place upon developments. It is seen as the most proactive, yet reasonable way to plan for future heatwave risk.		
Option 1: Have no local policy	<ol style="list-style-type: none"> 1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 4. To have an affordable home 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. To promote healthy, active, cohesive and socially sustainable communities 10. Participate in sport/ health 	<p>--</p> <p>-</p> <p>?</p> <p>0</p> <p>0</p> <p>--</p> <p>0</p> <p>?</p> <p>?</p> <p>0</p>	
<p>Commentary By not having a policy on heatwave risk, there would be no way of ensuring that its impacts are mitigated in new developments and it would be left for developers to implement if they so wished. This could lead to no mitigation actually occurring.</p>			
Option 2 Have policy that applies a different requirement to different developments.	<ol style="list-style-type: none"> 1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 4. To have an affordable home 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. To promote healthy, active, cohesive and socially sustainable communities 10. Participate in sport/ health 	<p>++</p> <p>++</p> <p>++</p> <p>?</p> <p>?</p> <p>++</p> <p>0</p> <p>0</p> <p>+</p> <p>0</p>	
<p>Commentary Ensuring that there is the ability to cope with future extreme temperatures is very important and the NPPF requires the local authority to take a pro-active approach to such issues. By asking for different levels or compatibility with the policy dependant on development type/size we can ensure we try to mitigate the risks without putting too much of a burden on developers.</p>			
Option 3 Have policy that applies a universal requirement across all developments.	<ol style="list-style-type: none"> 1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 4. To have an affordable home 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 	<p>++</p> <p>++</p> <p>++</p> <p>--</p> <p>?</p> <p>++</p> <p>0</p> <p>-</p>	

	9. To promote healthy, active, cohesive and socially sustainable communities	+	
	10. Participate in sport/ health	0	
<p>Commentary Option 3 appears to be similar to Option 2, and would suitably address the need to mitigate heatwave risk. However there is the worry that by creating a flat requirement for all developments would make the burden on some developments too much. Thus making them not financially viable, this could then hamper future development.</p>			

Policy ENV6: Water Efficient Development			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option:	Option 1: Development of a local plan policy to mitigate the impact of development on the water environment. This approach draws upon the established evidence base to identify a locally specific water stress issue that can be mitigated through the local plan by scoping a policy requiring major developments to go beyond the minimum water efficiency standards identified nationally. In doing so, this approach pro-actively addresses an identified water stress issue, whilst delivering other benefits against identified sustainability indicators.		
Option 1: Develop a local plan policy to mitigate the impact of development on the water environment.	1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 4. To have an affordable home 6. Conserve/ enhance biodiversity habitats 8. Ensure the provision of sufficient infrastructure 9. To promote healthy, active, cohesive and socially sustainable communities.	++ + / ? ++ ++ +	
<p>Commentary: The Option 1 approach would involve the development of a local plan policy, which details the water efficiency requirements for new development.</p> <p>The Gatwick sub-region Water Cycle Study (2010) recognises that Crawley is situated in an area of water stress, and recommends that the local plan should include policy to help mitigate the impact of development on the water environment. By developing a locally specific policy, the local plan will be able to build upon the water efficiency requirements of the NPPF, drawing upon the evidence base of the Water Cycle Study to scope the feasibility of adopting a local standard that goes beyond the minimum national requirements. Such an approach would help mitigate a locally specific issue, thereby promoting a more sustainable plan. Therefore, Option 1 is the preferred approach.</p> <p>Objectives scoped out: 5, 7, and 10 - it is not considered that the above option would impact on these objectives.</p>			
Option 2: Rely on existing national requirements of the NPPF, Code for Sustainable Homes and BREEAM to mitigate the impact of development on the water environment.	1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 4. To have an affordable home 6. Conserve/ enhance biodiversity habitats 8. Ensure the provision of sufficient infrastructure 9. To promote healthy, active, cohesive and socially sustainable communities.	+ + / ? + + +	
<p>Commentary: Rely on the existing national requirements of the NPPF, Code for Sustainable Homes and BREEAM to mitigate the impact of development on the water environment.</p> <p>This approach would rely on existing national guidance (NPPF) and minimum water efficiency standards as identified in the Code for Sustainable Homes and</p>			

	<p>BREEAM to mitigate the impact of development on the water environment. Whilst the approach would go some way to addressing identified water stress issues, it fails to react to key messages set out within the local plan evidence base. As such, although Option 2 would deliver benefits against some of the sustainability indicators, the impacts are not as pronounced as those deliverable through Option 1.</p> <p>Objectives scoped out: 5, 7, and 10 - it is not considered that the above option would impact on these objectives.</p>
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Policy ENV7: Tackling Fuel Poverty by Improving Existing Homes

The proportion of fuel poor households is rising rapidly, currently standing at 9.2% in 2009. This is exacerbated by the amount of homes with poor energy performance in Crawley in the existing housing stock.

To help address this, two options are being considered:

1. Include a policy to reflect the need to upgrade existing homes to meet our carbon neutral target.

2. Not to include a policy.

Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 1 has been chosen to help address the growing need within the borough to upgrade the housing stock. Whilst fuel poverty is not referenced in the NPPF, we feel it is a vital area that the borough needs to improve and offers considerable benefits over Option 2.		
Option 1: Include a policy to reflect the need to upgrade existing homes to meet our carbon neutral target.	1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 4. To have an affordable home 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. To promote healthy, active, cohesive and socially sustainable communities 10. Participate in sport/ health	++ ++ ++ ++ 0 + 0 + + 0	
Commentary In order to help the borough achieve our target of being carbon neutral by 2050 it is important that we upgrade our existing housing stock. This can be achieved by using policy ENV1 (Part D) to fund the improvement in energy performance. This will have numerous benefits and mean that those in older properties will not be hit harder by fuel shocks, be they price or supply related. The policy also aims at aligning itself with national schemes as the NPPF asks for most other areas.			
Option 2 Not to include a policy.	1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 4. To have an affordable home 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. To promote healthy, active, cohesive and socially sustainable communities 10. Participate in sport/ health	/ / / / 0 / 0 / / 0	
Commentary By not including a policy, no improvements can be guaranteed. This would result in the current situation remaining whereby energy is lost and fuel poverty and the effects of fuel shocks would remain.			

Policy ENV8: Pollution Management and Land Contamination			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Commentary: Option 2: Develop a specific local plan policy to manage issues of pollution and land contamination. It is considered that the Option 2 approach more readily enables the local planning authority to ensure development promotes the concepts of sustainable development, and is for this reason the preferred approach.		
Option 1: Rely on existing legislation to manage issues of pollution and land contamination	1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 4. To have an affordable home 6. Conserve/ enhance biodiversity habitats 9. To promote healthy, active, cohesive and socially sustainable communities	+ + + + + +	
	Commentary: Rely on existing legislation to manage issues of pollution and land contamination. This approach would rely on existing environmental health and other relevant legislation to ensure that development is brought forward in a sustainable manner. Although the approach is sustainable in the sense that key issues will be addressed through legislation, without a policy 'hook' through which planning is able to input into decisions, it is possible that opportunities for sustainable development may not be maximised. As such, it is considered that a local plan policy approach is required to support the legislation, and Option 1 is not therefore preferred. Objectives scoped out: 5, 7, 8 and 10 - it is not considered that the above option would impact on these objectives.		
Option 2: Develop a specific local plan policy to manage issues of pollution and land contamination	1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 4. To have an affordable home 6. Conserve/ enhance biodiversity habitats 9. To promote healthy, active, cohesive and socially sustainable communities.	++ ++ ++ + + ++	
	Commentary: The Option 2 approach would be to develop a specific local plan policy to manage issues of pollution and land contamination. In developing a local plan policy, this approach provides a mechanism through which environmental health advice can be factored into the planning system, offering greater policy certainty and clarity, and a consistency of approach for developers and decision makers. In doing so, it is considered that the Option 2 approach more readily enables the local planning authority to ensure development promotes the concepts of sustainable development, and is for this reason the preferred approach. Objectives scoped out: 5, 7, 8 and 10 - it is not considered that the above option would impact on these objectives.		

Policy ENV9: Noise Sensitive Development			
One role of the planning system to prevent noise from giving rise to significant adverse effects on health and quality of life as a result of new development. Where conflict does arise, impacts must, as far as possible, be mitigated against and reduced to a minimum. To achieve this, two approaches are being considered: <ol style="list-style-type: none"> Do not include a noise policy in the local plan, instead relying on national guidance to manage the relationship between noise and development. Include a policy within the local plan to take account of local circumstance. 			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 2 is chosen, as it is considered the approach enables greater certainty in the determination of development management decisions, whilst enabling local circumstance to be taken into account of within both a site allocation and development management context.		
Option 1: Do not include a noise specific policy in the local plan,	9. To promote healthy, active, cohesive and socially sustainable communities.	+?	
	Commentary: Under this option, the local plan would not bring forward a policy to manage the relationship between development and noise. Rather, it would rely on the guidance of the		

<p>instead relying on the guidance of the NPPF.</p>	<p>NPPF to:</p> <ul style="list-style-type: none"> • avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of development, and • mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development, including through the use of conditions. <p>A possible area of uncertainty is that the NPPF withdraws the Noise Exposure Categories of PPG24: Planning and Noise, and there is no practice guidance in place for retention. The NPPF refers instead to the DEFRA Explanatory Note to the Noise Policy Statement for England, as a means of determining levels of noise impact. However, this document does not provide clear guidance as to the point at which the Significant Observed Adverse Effect Noise Level (affecting health and quality of life) is reached. This presents potential problems in determining the level at which the onset of noise exposure become inappropriate, an issue that will need to be considered in determining noise related applications.</p> <p>Objectives scoped out: Objectives 1-9, and 10 do not specifically relate to issues of noise.</p>		
<p>Option 2: Include a locally specific noise policy in the local plan.</p>	<p>9. To promote healthy, active, cohesive and socially sustainable communities.</p>	<p>+</p>	<p>Commentary: Option 2 would involve the inclusion of a locally specific noise policy within the local plan. The approach would enable the local plan to spatially identify areas where noise exposure is known to be an issue, requiring noise sensitive development within these areas to demonstrate how impacts would be mitigated to make development acceptable. Whilst continuing to reflect national objectives regarding the avoidance of noise giving rise to health impacts, a local plan policy will refer to local noise guidance that is being progressed by East and West Sussex authorities on a joint basis. Further, development of a local plan policy provides an important opportunity to develop localised noise targets, and more specifically define the noise exposure levels at which the Significant Observed Adverse Effect Noise Level (i.e. noise affecting health and quality of life) is reached.</p> <p>Objectives scoped out: Objectives 1-9, and 10 do not specifically relate to issues of noise.</p>

<p>Policy ENV10: Air Quality</p>			
<p>Although air quality in Crawley is generally good, an Air Quality Management Area has recently been identified along the A2011, whilst monitoring has identified other sites in the borough where further AQMAs may be declared. It is therefore important to ensure that development proposals do not impact negatively on the air quality environment, and two policy options have been considered to ensure this is the case:</p>			
<p>1. Do not include an air quality policy in the local plan, instead relying on national guidance to manage the relationship between air quality and development. 2. Include a policy within the local plan to take account of local circumstance.</p>			
<p>Policy Options</p>	<p>SA Objective with Significant Effect</p>	<p>Positive or Negative Impact</p>	<p>Mitigation of Negative Impacts</p>
<p>Chosen Option</p>	<p>It is considered that in enabling national air quality guidance to be interpreted and addressed at the local level, Option 2 represents the most sustainable approach to managing the relationship between development and air quality, both within and beyond the borough.</p>		
<p>Option 1: Do not include a specific air quality policy in the local plan, instead relying on the guidance of the NPPF.</p>	<p>1. To minimise climate change 2. To adapt to climate change 6. Conserve/ enhance biodiversity habitats 9. To promote healthy, active, cohesive and socially sustainable communities.</p>	<p>+</p> <p>+</p> <p>+</p> <p>+</p>	<p>Commentary: Under this option, the local plan would not bring forward a policy to manage the air quality impact of development. Rather, it would rely on the guidance of the National Planning Policy Framework, which requires the planning system to contribute to and enhance the natural and local environment by:</p> <ul style="list-style-type: none"> - preventing new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels air pollution (NPPF Paragraph 109); - ensuring that new development is appropriate for its location to avoid unacceptable risks from pollution, and that effects (including cumulative) of pollution on health/natural environment/general amenity are taken into account, along with potential sensitivity of the development to adverse effects from pollution (NPPF Paragraph 120). - complying with and contributing towards EU limit values or national objectives for pollutants, taking account of Air Quality Management Areas and cumulative impacts on

	<p>air quality from individual sites in local areas (NPPF Paragraph 124).</p> <ul style="list-style-type: none"> - ensuring through planning decisions that new development in an AQMA is consistent with the local air quality action plan (NPPF Paragraph 124). <p>This approach avoids repetition of national guidance, and provides a 'hook' through which development proposed in Air Quality Management Areas can contribute to addressing localised exceedances of EU air quality indicators by meeting objectives of the air quality action plan. However, there remains a need to identify locally the development thresholds (level, type, and location of development) that would be considered to impact on air quality. As such, local guidance of some form is likely to be necessary were the above approach to be progressed.</p>		
Option 2: Include a locally specific air quality policy in the local plan.	<ul style="list-style-type: none"> 1. To minimise climate change 2. To adapt to climate change 6. Conserve/ enhance biodiversity habitats 9. To promote healthy, active, cohesive and socially sustainable communities. 	<ul style="list-style-type: none"> ++ ++ ++ ++ 	
<p>Commentary: Option 2 would involve the inclusion of a locally specific air quality policy within the local plan that would refer to emerging Air Quality & Emission Mitigation Guidance for Sussex being produced by Sussex Air in partnership with Sussex Local Planning Authorities. The guidance being produced identifies Sussex-wide guidance to identify local thresholds outlining the level, type, and location of development at which the requirement to undertake an Air Quality Assessment, and if necessary provide mitigation to offset air quality impact, will be required. A local plan policy approach also provides an opportunity to consider the potential cross boundary impacts of development within Crawley. On this basis, it is felt that a locally specific policy will more effectively enable the national air quality objectives of the NPPF to be delivered within a local context.</p>			

Policy ENV11: Green Infrastructure			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 1		
Option 1: Identify a green infrastructure network and opportunities for enhancement	<ul style="list-style-type: none"> 1 - minimise climate change 2 - adapt to climate change 3 - protect/enhance built environment 4 - Decent, affordable homes 5 - maintain/support employment 6 - conserve/enhance biodiversity and landscape 7 - promote sustainable journeys 8 - provide sufficient infrastructure 9 - promote sustainable communities 10 - encourage active lifestyles 	<ul style="list-style-type: none"> + + + 0 0 ++ 0 ++ + ++ 	
<p>Commentary This option provides away of ensuring the required green infrastructure is delivered to support planned development. It also ensures that existing green infrastructure is not compromised by requiring mitigation or compensation for negative impacts on green infrastructure.</p>			
Option 2: Do not identify a green infrastructure network and do not identify green infrastructure to support development	<ul style="list-style-type: none"> 1 - minimise climate change 2 - adapt to climate change 3 - protect/enhance built environment 4 - Decent, affordable homes 5 - maintain/support employment 6 - conserve/enhance biodiversity and landscape 7 - promote sustainable journeys 8 - provide sufficient infrastructure 9 - promote sustainable communities 10 - encourage active lifestyles 	<ul style="list-style-type: none"> - - ? ? ? -- 0 -- -- -- 	
<p>Commentary Without identifying Crawley's valued green infrastructure and requiring impacts upon it to be mitigated or compensated for would gradually lead to a loss of green infrastructure.</p>			

Policy ENV12: Biodiversity			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 1: This is the most suitable option because biodiversity in England has been declining and becoming more fragmented. A net gain is required to reverse this trend and achieve the national ambition of moving from net biodiversity loss to net gain.		
Option 1: To ensure a net gain in biodiversity	1 - minimise climate change	+	
	2 - adapt to climate change	+	
	3 - protect/enhance built environment	+	
	4 - Decent, affordable homes	/	
	5 - maintain/support employment	/	
	6 - conserve/enhance biodiversity and landscape	++	
	7 - promote sustainable journeys	0	
	8 - provide sufficient infrastructure	+	
	9 - promote sustainable communities	+	
	10 - encourage active lifestyles	+	
	Commentary This is the most suitable option because biodiversity in England has been declining and becoming more fragmented. A net gain is required to reverse this trend and achieve the national ambition of moving from net biodiversity loss to net gain.		
Option 2: to ensure no net loss of biodiversity	1 - minimise climate change	+?	
	2 - adapt to climate change	+?	
	3 - protect/enhance built environment	/	
	4 - Decent, affordable homes	/	
	5 - maintain/support employment	/	
	6 - conserve/enhance biodiversity and landscape	+?	
	7 - promote sustainable journeys	0	
	8 - provide sufficient infrastructure	-	
	9 - promote sustainable communities	?	
	10 - encourage active lifestyles	-	
	Commentary This policy approach protects what we already have but falls short of local and national ambitions to improve biodiversity as well as halt its loss.		

Policy ENV13: Open Space, Sport and Recreation			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 2		
Option 1: Protect open space from development unless proven to be surplus.	1 - minimise climate change	?	
	2 - adapt to climate change	?	
	3 - protect/enhance built environment	?	
	4 - Decent, affordable homes	0	
	5 - maintain/support employment	0	
	6 - conserve/enhance biodiversity and landscape	+?	
	7 - promote sustainable journeys	0	
	8 - provide sufficient infrastructure	-	
	9 - promote sustainable communities	-	
	10 - encourage active lifestyles	-	
	Commentary This option puts the onus on developers to justify loss of any open space. This approach would likely protect open space but would not allow the Council to make the best use of the open space for example identifying where there are deficits or surpluses that could be used for other types of open space. Without this evidence it may be difficult to require a CIL charge.		
Option 2: Undertake an open space study to identify open space needs,	1 - minimise climate change	+	
	2 - adapt to climate change	+	
	3 - protect/enhance built environment	+	
	4 - Decent, affordable homes	0	
	5 - maintain/support employment	0	

deficits/surplus	6 - conserve/enhance biodiversity and landscape	+	
	7 - promote sustainable journeys	0	
	8 - provide sufficient infrastructure	++	
	9 - promote sustainable communities	+	
	10 - encourage active lifestyles	+	
Commentary			
This approach is in line with national guidance. The current open space study runs to 2016. Reviewing the open space study as part of the local plan 2014-29 is a logical way of ensuring the best use of land to meet Local Plan objectives.			

Infrastructure

Policy IN1: Infrastructure Provision

Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option Option one	Option one has been chosen as it is considered to have a greater impact on the provision of infrastructure than relying solely on the NPPF. As infrastructure includes a wide range of buildings and services it can contribute to sustainability objectives in a variety of ways by adding to the quality of life through the provision of social infrastructure and by ensuring that other services have sufficient capacity to meet the needs of the borough. If these needs were not met e.g. not be able to deal with waste, then there would be specific environmental issues as well as a poor quality of life. The vast majority of the provision of infrastructure occurs within the town which minimises distances travelled.		
Option 1: A case by case assessment on relevant applications to ensure that where relevant new infrastructure is provided and existing infrastructure is protected	1. To minimise climate change	+?	
	2. To adapt to climate change	/	
	3. Protect / enhance built environment	/	
	4. Decent affordable homes	/	
	5. Maintain/ support employment base	/	
	7. Reduce car journeys	+	
	8. Ensure the provision of sufficient infrastructure	++	
	9. Healthy active cohesive communities	++	
	10. Participate in health/ sport	+	
Commentary			
The main objective of this policy is to ensure that development meets its infrastructure needs through the use of existing infrastructure or new infrastructure where its need is generated by the new development. It is important that this is highlighted locally to maximise links to the Infrastructure Plan which sets out the provision of infrastructure in the town in more detail and to link to how the infrastructure is to be funded. Although there is a neutral effect on some sustainability objectives, policies elsewhere in the plan deal more effectively with these issues.			
Option 2: Do nothing locally and rely on NPPF	1. To minimise climate change	+?	
	2. To adapt to climate change	+?	
	3. Protect / enhance built environment	0	
	4. Decent affordable homes	0	
	5. Maintain/ support employment base	0	
	7. Reduce car journeys	++	
	8. Ensure the provision of sufficient infrastructure	++	
	9. Healthy active cohesive communities	++	
	10. Participate in health/ sport	+	
Commentary Relying solely on the NPPF means that the positive effects of this policy option compared to option one are diminished. Infrastructure provision is specific to each local area and it is important that these local links are maximised.			

Policy IN2: Strategic Delivery of Telecommunications

Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option Option 1	Option 1 has been chosen as it could have greater benefits than relying on the general provision of infrastructure. It is important that developments have the ability to connect to		

	broadband services and any other communications infrastructure that may be delivered in the future to maximise the benefits to both business and residents.		
Option 1: A specific policy relating to the strategic delivery of telecommunications.	1. To minimise climate change	+	
	2. To adapt to climate change	+	
	3. Protect / enhance built environment	0	
	4. Decent affordable homes	0	
	5. Maintain/ support employment base	+	
	7. Reduce car journeys	+	
	8. Ensure the provision of sufficient infrastructure	++	
	9. Healthy active cohesive communities	0	
	10. Participate in health/ sport	0	
Commentary Telecommunications through the use of teleconferencing and working from home can reduce car journeys (SA Objective 7) which can also benefit climate (SA objectives 1 and 2). By designing for the provision of such infrastructure from the outset, this will help minimise disruption, costs and the use of resources to retrofit it, into development/			
Option 2: Relying on the policies dealing with the general provision of infrastructure.	1. To minimise climate change	+	
	2. To adapt to climate change	+	
	3. Protect / enhance built environment	0	
	4. Decent affordable homes	0	
	5. Maintain/ support employment base	+	
	7. Reduce car journeys	+	
	8. Ensure the provision of sufficient infrastructure	++	
	9. Healthy active cohesive communities	0	
	10. Participate in health/ sport	0	
Commentary Telecommunications infrastructure would be covered by the main infrastructure policy which applies to a wide range of infrastructure. Although, the policy would make a positive contribution to the sustainability objectives, these might not be as great as a policy highlighting the requirements for designing for telecommunications infrastructure.			

Policy IN3: New Development and Requirements for Sustainable Transport			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option: Option One	Option One has been chosen since broadly, this policy option will ensure that we can reduce car journeys substantially (SA Objective 7), and as a consequence, minimise climate change (SA Objective 1). However, relying on such broad brush policies in the NPPF (Option Two) will have a impact on whether new developments that generate significant movement are located within the appropriate locations, since the NPPF states we (the Local Planning Authority) should create local policies with regards to this matter. In addition, with regards to the retention and usage of existing transport infrastructure (SA Objective 8), it is believed that Option One could ensure that the existing transport infrastructure provision is utilised to its full potential.		
Option 1: A case by case assessment (through the Development Control procedures) on whether any minor or major planning application is considered to be in a sustainable location. A presumption in favour of concentrating development where sustainable travel patterns can	1. To minimise climate change	+	
	2. To adapt to climate change	/	
	3. Protect / enhance built environment	+?	
	4. Decent affordable homes	?	
	5. Maintain/ support employment base	?	
	7. Reduce car journeys	++	
	8. Ensure the provision of sufficient infrastructure	+	
	9. Healthy active cohesive communities	+?	
	10. Participate in health/ sport	+	
Commentary SA Objectives scoped out: 6. Conserve/ enhance biodiversity habitats – I believe that this policy will not directly relate to such habitats. The main thrust of this policy option is to ensure that each development sufficiently meets its access needs, whilst utilising the existing transport infrastructure. A reduction in car journeys (SA Objective 7) and subsequent reduction in carbon emissions (SA Objective 1) are the likely effects of this policy. It is unlikely that this policy option will have significant effect either			

be achieved using existing transport infrastructure.	way on the protection of the built environment (SA Objective 3) or the sustainable design of new developments (SA Objective 2). It is also contended that the sustainable location of both community centres and leisure facilities should assist with participation in sport (SA Objective 10) and in creating cohesive communities (SA Objective 9). In addition, I believe that this policy option will have an uncertain impact upon both affordable housing provision (SA Objective 4) and maintaining a diverse employment base (SA Objective 5), since both employment sites and affordable housing sites could be unviable in such locations. Lastly, it is believed that a potential increase in the usage of existing transport infrastructure for new developments will minimise the need for new transport infrastructure (SA Objective 8) within the Borough.		
Option 2: Do nothing locally and rely solely on the NPPF to promote sustainable transport policies.	<ol style="list-style-type: none"> 1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 4. Decent affordable homes 5. Maintain/ support employment base 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy active cohesive communities 10. Participate in Health/Sport 	<p style="text-align: center;">+? / / -? ? + +? +? +?</p>	
<p>Commentary SA Objectives scoped out: 6. Conserve/ enhance biodiversity habitats – I believe that this policy will not directly relate to such habitats.</p> <p>Relying solely on the NPPF means that the positive effects of this policy option compared to option one are diminished somewhat. Indeed, the NPPF (Para 34) states that the Local Plan should ensure that developments that generate 'significant' movement are located where the need to travel is minimal. Thus, with such general policies, it is difficult to establish whether a reduction in car travel (SA Objective 7) and a reduction in greenhouse gas emissions (SA Objective 1) is achievable. It is unlikely that this policy option will have significant effect either way on the protection of the built environment (SA Objective 3) or the sustainable design of new developments (SA Objective 2). In addition, I believe that this policy option will also have an uncertain impact upon both affordable housing provision (SA Objective 4) and maintaining a diverse employment base (SA Objective 5), since both employment sites and affordable housing sites could be unviable in such locations. It is also contended that the sustainable location of both community centres and leisure facilities would be more uncertain, with participation in sport (SA Objective 10) and the creation of cohesive communities (SA Objective 9) becoming more unpredictable. Lastly, it is believed that the usage of existing transport infrastructure for new developments will become more uncertain (SA Objective 8) within the Borough, since the NPPF lacks strength in arguing for the use of existing infrastructure.</p>			

Policy IN4: Parking Standards			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option: Option One	Option One has been chosen, since it is believed that the creation of parking standards for both retail/commercial uses within the town centre and residential uses in the neighbourhoods, is the best way forward in terms of the sustainability appraisal. Indeed, owing to the unique characteristics of Crawley, neighbourhood parking is problematic, and subsequently, an assessment of parking standards which reflects the different levels of accessibility within the town, will support reduced car travel (SA Objective 7) and minimise climate change (SA Objective 1). The creation of parking standards for the town centre only (Option Two) will only provide parking spaces for that particular area (SA Objective 8), and as such, residential neighbourhoods may suffer further from a lack parking if no parking standards are confirmed.		
Option 1: Create parking standards for different uses including non-residential and residential uses, and moreover, different locations	<ol style="list-style-type: none"> 1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 	<p style="text-align: center;">+ +? -? -? - + +</p>	

<p>which reflect the different levels of accessibility within the town.</p>	<p>Commentary SA Objectives scoped out: 4. Decent affordable homes – No direct effect upon the provision of affordable homes.</p> <p>9. Healthy active cohesive communities – I believe that parking standards would not have a significant impact upon this objective.</p> <p>10. Participate in sport/health – In addition, I believe that this objective would be unaltered due to parking standards.</p> <p>The main purpose of this policy option is to ensure that adequate parking provision is provided, that does not overcompensate for the use of car (SA Objective 7), and subsequently, a reduction in carbon emissions (SA Objective 1). It is difficult to ascertain whether restrictive parking standards would actually limit economic investment (SA Objective 5) as sites become undesirable, or even undeliverable.</p> <p>In addition, it is questionable whether this policy option will ensure that sustainable developments (SA Objective 2) are built, and moreover, it is unlikely that the built environment (SA Objective 3) would be enhanced with new parking. Clearly, new parking will have the potential to have a negative impact upon biodiversity habitats (SA Objective 6), but this impact could be mitigated on a case by case basis. The provision of an appropriate number of car/cycle parking spaces would assist in maintaining transport infrastructure within Crawley (SA Objective 8).</p>		
<p>Option 2: Only implement parking standards for Town Centre locations, as prioritised in the NPPF. This national policy is considered to provide convenient, safe and secure parking, in order to promote economic growth.</p>	<p>1. To minimise climate change +? 2. To adapt to climate change +? 3. Protect/ enhance built environment - 5. Maintain/ support employment base - 6. Conserve/ enhance biodiversity habitats - 7. Reduce car journeys + 8. Ensure the provision of sufficient infrastructure ?</p>		
	<p>Commentary SA Objectives scoped out: 4. Decent affordable homes – No direct effect upon the provision of affordable homes.</p> <p>9. Healthy active cohesive communities – I believe that parking standards would not have a significant impact upon this objective.</p> <p>10. Participate in sport/health – In addition, I believe that this objective would be unaltered due to parking standards.</p> <p>The main purpose of this policy option is to ensure that adequate parking provision is provided, that does not overcompensate for the use of car (SA Objective 7), and subsequently, a reduction in carbon emissions (SA Objective 1) within the Town Centre only. It is believed that restrictive parking standards would actually limit the amount of economic investment in the town centre (SA Objective 5), as sites become undesirable, or even undeliverable. In addition, it is questionable whether this policy option will ensure that sustainable developments (SA Objective 2) are built, and moreover, it is unlikely that the built environment (SA Objective 3) would be enhanced with new parking. There will be a negative impact in terms of conserving biodiversity habitats (SA Objective 6) with new parking spaces, although this can be mitigated through Development Control on a case by case basis. Transport Infrastructure will be maintained and even improved in the town centre, but other residential neighbourhoods could suffer with a lack of necessary transport infrastructure (SA Objective 8).</p>		

<p>Policy IN5: The Location and Provision of New Infrastructure</p>			
<p>Policy Options</p>	<p>SA Objective with Significant Effect</p>	<p>Positive or Negative Impact</p>	<p>Mitigation of Negative Impacts</p>
<p>Chosen Option Option 1</p>	<p>There are significant benefits in locating development in the most accessible location as this will effect the length of journeys and how people travel to infrastructure. (SA objective 1 and 7) If infrastructure is accessible by public transport or can be walked or cycled to, there are benefits in terms of reduced car trips and reduced pollution. Some forms of infrastructure do not generate a significant number of trips as they contain plants and machinery and may be located in alternative locations. In determining the most accessible location, the catchment of the infrastructure will be taken into account as infrastructure can either be provided on a</p>		

	town wide basis or within each neighbourhood. There are also benefits to SA objectives 9 and 10 as it can help maximise the use of these facilities by less mobile sections of the population.		
Option 1: Locating new infrastructure in the most accessible locations	1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy active cohesive communities 10. Participate in Health/Sport	++ 0 0 + 0 ++ + + +	
	<p>Commentary Locating facilities in the most accessible locations will affect how people choose to travel to the facilities. The neighbourhood structure of the town also helps encourage the provision of facilities with a neighbourhood catchment within the neighbourhoods themselves. Maximising the number of people walking, cycling and using public transport can help reduce car journeys, pollution and the impact on climate change. The provision of facilities in accessible locations can maximise the use of health, sports and social facilities for people who do not have access to a private car. This can therefore contribute to SA objectives 9 and 10.</p>		
Option 2: Relying on the transport objectives of the NPPF	1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy active cohesive communities 10. Participate in Health/Sport	+ 0 0 + 0 + + + +	
	<p>Commentary Relying on the principles of the NPPF in terms of transport objectives would achieve some positive benefits, but it is not considered that these would be as great as highlighting the role that locating infrastructure in the most accessible locations can have on travel patterns. The social benefits of providing access to services may not also be as great.</p>		

Policy IN6: Improving Rail Stations			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option Option One	Option One has been chosen since broadly, this policy option has a positive impact on both the natural and built environment, in terms of reducing private motor vehicle travel and ensuring that the built environment is enhanced. In addition, it is believed that promoting development to be situated within the vicinity of rail stations will assist in maintaining the current employment base within the town. Conversely, Option Two does not promote economic growth directly, and as such, this objective (SA Objective 5) is uncertain. In addition, it also uncertain, without the promotion of developments within the vicinity of the rail stations, whether this option would substantially enhance the built environment. Lastly, Option Three would have a detrimental effect upon the environment, since maintaining the status quo could actually increase private motor vehicle usage as rail access and capacity becomes stretched.		
Option 1: To concentrate improvements and development within the vicinity of the rail stations to enhance the specific roles of each station.	1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 5. Maintain/ support employment base 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy active cohesive communities	+ +? + +? ++ + +?	
	<p>Commentary SA objectives scoped out: 4. Decent affordable homes – Improvements directly to the rail stations will have no direct impact on the provision of affordable homes.</p>		

	<p>6. Conserve/ enhance biodiversity habitats – I believe that this policy will not directly relate to such biodiversity habitats.</p> <p>10. Participate in sport/health – I believe that this policy option will not directly relate to sports participation.</p> <p>The main thrust of this policy option is to concentrate on development and improvements at rail stations in order to promote the use of rail services, and subsequently to reduce car travel (SA Objective 7) and minimise climate change (SA Objective 1). It is also posited that this concentration of development and improvements at rail stations will improved economic performance (SA Objective 5), particularly at Crawley Rail Station, which will act as catalyst for retail development within the town. Although it is not necessarily certain that the sustainable design of developments will be implemented within the vicinity of the train stations (SA Objective 2), it is envisaged that buildings of high architectural merit will be maintained or improved (SA Objective 3). The current provision of rail infrastructure within the Borough could be improved if this policy is realised, since rail patronage would rise, and thus, require further investment (SA Objective 8). It is believed that this policy option will only have a negligible impact (positive or negative) upon maintaining a healthy and cohesive community (SA Objective 9).</p>		
<p>Option 2: To ensure that the four train stations within the Borough are maintained up to the current standards and to seek improvements to the both the accessibility and capacity of rail stations only (I.e. without promoting major developments within the vicinity of the rail stations).</p>	<p>1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 5. Maintain/ support employment base 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy active cohesive communities</p>	<p>+ ? +? ? ++ +? /</p>	
	<p>Commentary SA objectives scoped out: 4. Decent affordable homes – Improvements directly to the rail stations will have no direct impact on the provision of affordable homes.</p> <p>6. Conserve/ enhance biodiversity habitats – I believe that this policy will not directly relate to such biodiversity habitats.</p> <p>10. Participate in sport/health – I believe that this policy option will not directly relate to sports participation.</p> <p>The main thrust of this policy option is to improve the rail stations in terms of accessibility and capacity, in order to promote the use of rail services, and subsequently to reduce car travel (SA Objective 7) and minimise climate change (SA Objective 1). It is uncertain whether the improvement to the rail stations will improve economic performance substantially without further developments within the vicinity of the rail stations (SA Objective 5). Furthermore, it is not necessarily certain that the sustainable improvements to the rail station buildings could be achieved (SA Objective 2) and it difficult to ascertain, without further development potential around the rail stations, whether the built environment could be improved substantially (SA Objective 3). The current provision of rail infrastructure within the Borough could be improved if this policy is realised, since rail patronage could rise, and thus, require further investment (SA Objective 8). It is believed that this policy option will have no significant effect upon creating a healthy and cohesive community (SA Objective 9).</p>		
<p>Option 3: This policy option will only look to maintain the status quo and ensure that train stations and services are not significantly reduced or left to deteriorate.</p>	<p>1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 5. Maintain/ support employment base 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy active cohesive communities</p>	<p>- +? +? - - ? /</p>	
	<p>Commentary SA objectives scoped out: 4. Decent affordable homes – Improvements directly to the rail stations will have no direct impact on the provision of affordable homes.</p> <p>6. Conserve/ enhance biodiversity habitats – I believe that this policy will not directly relate to such biodiversity habitats.</p>		

	<p>10. Participate in sport/health – I believe that this policy option will not directly relate to sports participation.</p> <p>The main part of this policy option is to ensure that both rail services and the rail stations are maintained at current levels. In terms of achieving a reduction in car travel (SA Objective 7) and minimising climate change (SA Objective 1), it is thought that only maintaining the current levels of rail infrastructure would have a detrimental impact upon these sustainability objectives, since commuters and other travellers may utilise a private motor vehicle. It is uncertain whether the maintenance of the rail stations and services would even sustain economic performance (SA Objective 5), since the town, without such infrastructure, becomes unattractive to investors. It is not necessarily certain that the sustainable improvements to the rail station buildings could be achieved (SA Objective 2) and it is unlikely that the built environment could be improved substantially without further improvements to the rail stations (SA Objective 3). The current provision of rail infrastructure within the Borough would not be improved if this policy is realised, and furthermore, without further development, only a limited amount contributions for infrastructure would be sought (SA Objective 8). It is believed that this policy option will have no significant effect upon creating a healthy and cohesive community (SA Objective 9).</p>
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Policy IN7: Crossovers			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option Option one	Although planning permission is not required to use front gardens for parking, where access to that area is from a classified road over a pavement or verge then planning permission is required. It is acknowledged that facilitating the provision of car parking could help encourage car ownership and therefore have a negative impact on SA objective 7. However, having a policy helps to minimise the impact on verges and the streetscene by only allowing crossovers where the local amenity are not adversely affected.		
Option 1: A policy to allow crossovers	1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy active cohesive communities 10. Participate in Health/Sport	? - ? 0 + - 0 0 0	
	Commentary As a result of its development as a new town, parking provision within the curtilages of houses in the older new town areas is limited which leads to significant levels of on-street parking. This can cause highway safety issues and could be considered unsightly. There may also be issues relating to surface water run off by the removal of permeable areas. Although, taken as a whole, the policy could be considered to have a negative impact on sustainability objectives, it does ensure that the impact on the street scene is more fully considered rather than relying on general design policies.		
Option 2: Rely on general design policies	1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy active cohesive communities 10. Participate in Health/Sport	? - ? 0 - - 0 0 0	
	Commentary A reliance on a general policy could mean that there is not such a specific focus on the impact on the amenity of the street scene which could lead to the loss of more verges or landscaped areas.		

Gatwick Airport

Policy GAT1: Development of the Airport with a Single Runway			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option Option 1	The growth of the airport to cater for additional passengers within its current two terminal, runway configuration can have a significant impact on a range of environmental objectives including those relating to climate change. However, the airport does also have a significant benefit to the local economy. The policy particularly highlights the need for environmental safeguards to be in place to mitigate the impact. This is currently achieved through the signing of a S106 agreement which sets out a range of obligations relating to mitigating the environmental impact of the airport on issues relating to noise, air quality, climate change and other environmental matters. Without the control of this policy and the associated S106 agreement the environmental impacts could be much greater.		
Option 1: Enable the growth of the airport	1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy active cohesive communities 10. Participate in Health/Sport	- - 0 ++ / - + 0 0	Section 106 agreement with the airport operator which sets out on obligations relating to mitigating the environmental impact of the airport
	Commentary The operation of an international airport will have an impact on the environment as well as making a significant contribution to the employment base in the Borough. However, the policy and S106 agreement will help ensuring that environmental impacts are mitigated as far as possible. Provisions for the revision of the S106 agreement also help ensure that the latest technological safeguards are considered to help mitigate the environmental impact of the airport. Part of the S106 agreement seeks to increase the proportion of passengers coming by public transport to help minimise the number of journeys made by car to the airport.		
Option 2: Assess applications against general planning policies.	1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy active cohesive communities 10. Participate in Health/Sport	-- -- 0 ++ / - + 0 0	
	Commentary The alternative to assessing applications against a specific Gatwick policy is to rely on general planning policies elsewhere in the plan. This could mean that the growth of the airport had a greater environmental impact by not allowing the specific environmental issues surrounding the growth of the airport to be fully considered.		

Policy GAT2: Safeguarded Land			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option Option 1 Safeguard land for a second runway	Current government policy requires land to be safeguarded for a second runway at Gatwick in case it is chosen as the most appropriate location to address the problem of airport capacity in the south east as a whole. The safeguarding policy itself does not have a significant impact, although the environmental impacts of a second runway would need to be fully assessed as part of the national debate on the need for and location of any additional runway capacity in the south east.		
Option 1: Safeguard land for	1. To minimise climate change 2. To adapt to climate change	? ?	If a second runway were to be built at Gatwick, the

a second runway	3. Protect/ enhance built environment 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy active cohesive communities 10. Participate in Health/Sport	? ? / ? ? - 0	necessary environmental safeguards should be in place to mitigate the environmental impact as far as possible. This could be achieved through a new S106 agreement.
Commentary The safeguarding policy restricts development in the safeguarded area which may be incompatible with the future development of a second runway. By minimising the amount of development in the area it is difficult to assess the impact of the policy. As the policy is not as such allocating land for a second runway as that will need to be based on national policy, the assessment is not based on that of the impact of a second runway.			
Option 2: ?			
Commentary It is not considered that there is another relevant option due to the requirement to safeguard land for a second runway to give safeguarding a statutory basis.			

Policy GAT3: Gatwick Airport Related Parking			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option Option 1	As passenger throughput at the airport grows, this will mean more passengers travelling by car even if the proportion of passengers using public transport increases. Therefore it is recognised that there are negative environmental impacts associated with car journeys being made. However, this policy seeks to ensure that the volume of car parking is commensurate with the achievement of the public transport target for passenger journeys. The Gatwick Surface Access Strategy sets out how the airport seeks to maintain and subsequently increased the proportion of passengers using public transport. The provision of additional car parking on airport, minimises the distance travelled by the passenger in travelling between the car park and the airport terminals. This therefore considered to have a lesser impact than additional sites for car parking which are located further away from the airport.		
Option 1: To provide additional car parking within the airport boundary	1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy active cohesive communities 10. Participate in Health/Sport	- - 0 / 0 -- / 0 0	
Commentary The provision of airport car parking will generate car journeys which can have an impact on objectives relating to reducing the use of the car and climate change. However, the policy seeks to ensure that the growth of car parking provision is based on demonstrable need in the context of the overall strategy for increasing the proportion of passengers using public transport. This should help minimise the level of the impact.			
Option 2: To allow car parking in other areas	1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy active cohesive communities 10. Participate in Health/Sport	- - 0 / 0 -- / 0 0	
Commentary The alternative option considered was to relax current airport related car parking requirements and allow off site parking provision. However, this is likely to encourage users to access Gatwick by car and would result in further pressure on land which could be more beneficially used for other users.			

Policy GAT4: Employment Uses at Gatwick			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	The direct impact of the use of office floorspace at the airport is similar whether it is used for an airport related use or not. However, there could be an additional environmental impact if additional office provision had to be made in the future to meet the needs of uses that required an on airport location for operational reasons. Therefore in the long term it is felt assessing the need for floorspace on a case by case basis is the most sustainable option.		
Option 1: Assessing the impact of the loss of floorspace	1. To minimise climate change	0	
	2. To adapt to climate change	0	
	3. Protect/ enhance built environment	0	
	5. Maintain/ support employment base	+	
	6. Conserve/ enhance biodiversity habitats	0	
	7. Reduce car journeys	+	
	8. Ensure the provision of sufficient infrastructure	0	
	9. Healthy active cohesive communities	0	
	10. Participate in Health/Sport	0	
	Commentary The use of office floorspace at the airport whether it is for an airport related use or a non airport related use will have the same direct impact in that it can make a contribution to the employment base and benefit from the good transport links. However, if this subsequently meant the provision of additional new office floorspace to meet the needs of airport related uses which have to be located on airport for operational reasons then there could be the additional loss of previously undeveloped land and its associated environmental impacts.		
Option 2: Allowing office floorspace to be used by non airport related uses without assessing need.	1. To minimise climate change	0	
	2. To adapt to climate change	0	
	3. Protect/ enhance built environment	0	
	5. Maintain/ support employment base	/	
	6. Conserve/ enhance biodiversity habitats	0	
	7. Reduce car journeys	+	
	8. Ensure the provision of sufficient infrastructure	0	
	9. Healthy active cohesive communities	0	
	10. Participate in Health/Sport	0	
	Commentary As above the use of office floorspace by non airport related uses has the same direct impact as airport related uses. However, it is the consequences of the possibility in the future of not being able to provide for airport related uses within existing floorspace which need to be considered.		

APPENDIX E: CONSULTATION QUESTIONS

We welcome any comments on the Sustainability Appraisal Scoping Report. Specific questions for consultation are listed below for convenience.

Having read the HRA screening report, do you feel that Appropriate Assessment of the impact of the implementation of the Local Plan is required?

Will our proposed methodology appraise the social, environmental and economic impacts of development proposals in line with the requirements for SA?

Are there any other groups with an interest in development in Crawley who we should involve in the process? (See Appendix B for a list of proposed list of consultation partners)

Are there any other issues you feel we should consider when developing the long term plan for development in the Borough?

Do the proposed Sustainability Objectives cover all the issues that are important to consider when developing land or buildings in Crawley?

Are there other options which should be assessed as part of the preferred strategy?

What mitigation opportunities are there to minimise/neutralise any potential negative impacts of the Plan policies on the Sustainability Appraisal Objectives?

Please make any suggestions for information you consider to be useful for the Council to monitor for assessing whether development is taking place in a sustainable manner.

APPENDIX F: ENGAGEMENT PARTNERS

We will consult with all relevant stakeholders during the preparation of the Local Plan and Sustainability Appraisal. We intend to carry out SA through engagement with specific statutory and locally significant partners, with view on aspects of the environmental, social or economic development of Crawley, and its impact on the surrounding areas. The list below indicates those partners we intend to approach directly to assist with the Sustainability Appraisal of Options and the Preferred Option for the Local Plan.

Crawley Borough Council partners:

Planning Development Management
Corporate Policy team
Environmental Health
Housing

Statutory consultees:

Natural England
Environment Agency
English Heritage
Highways Agency
NHS Sussex

West Sussex County Council:

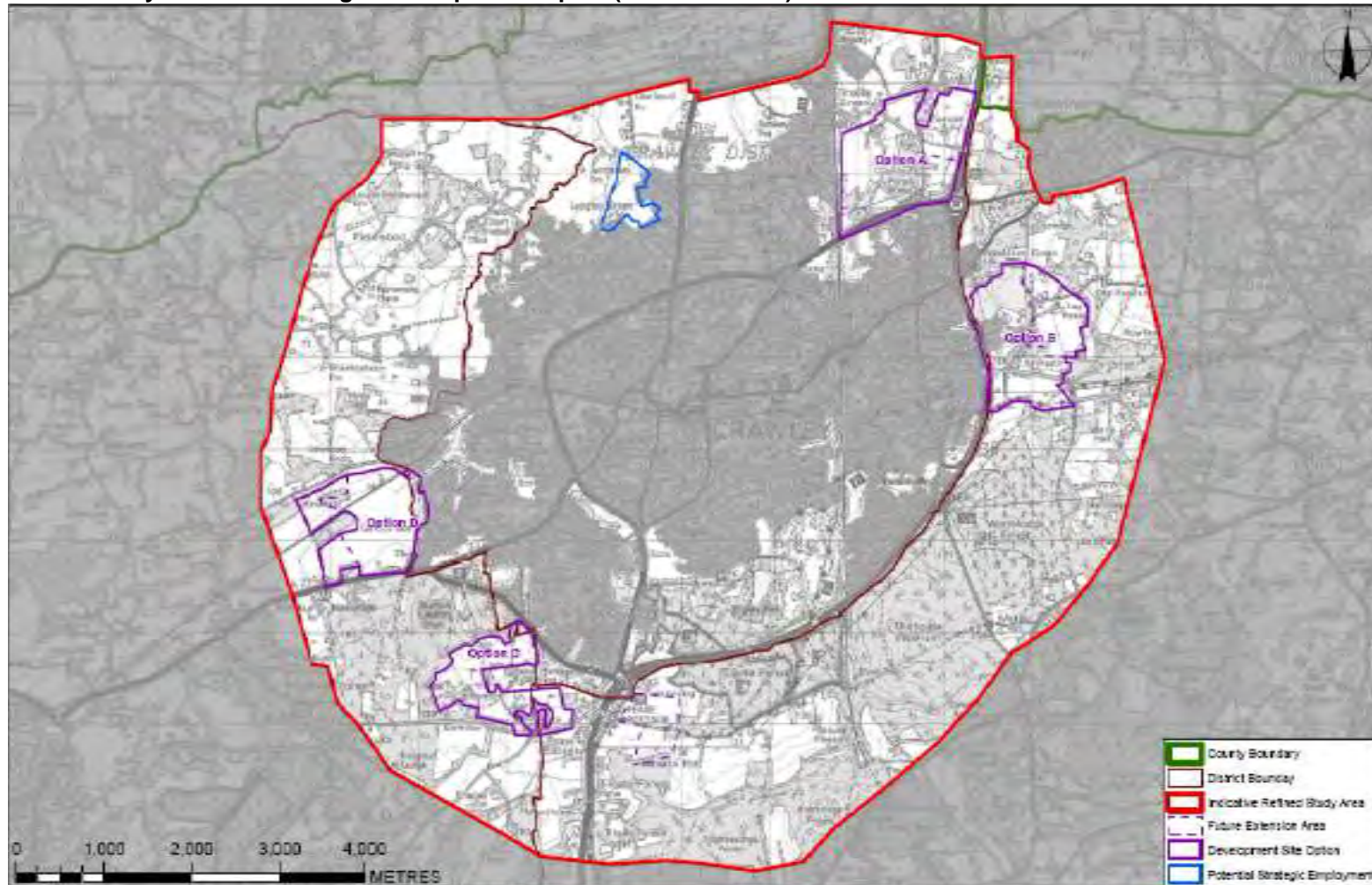
Transport and infrastructure
Education
Minerals and Waste

Minority Forums:

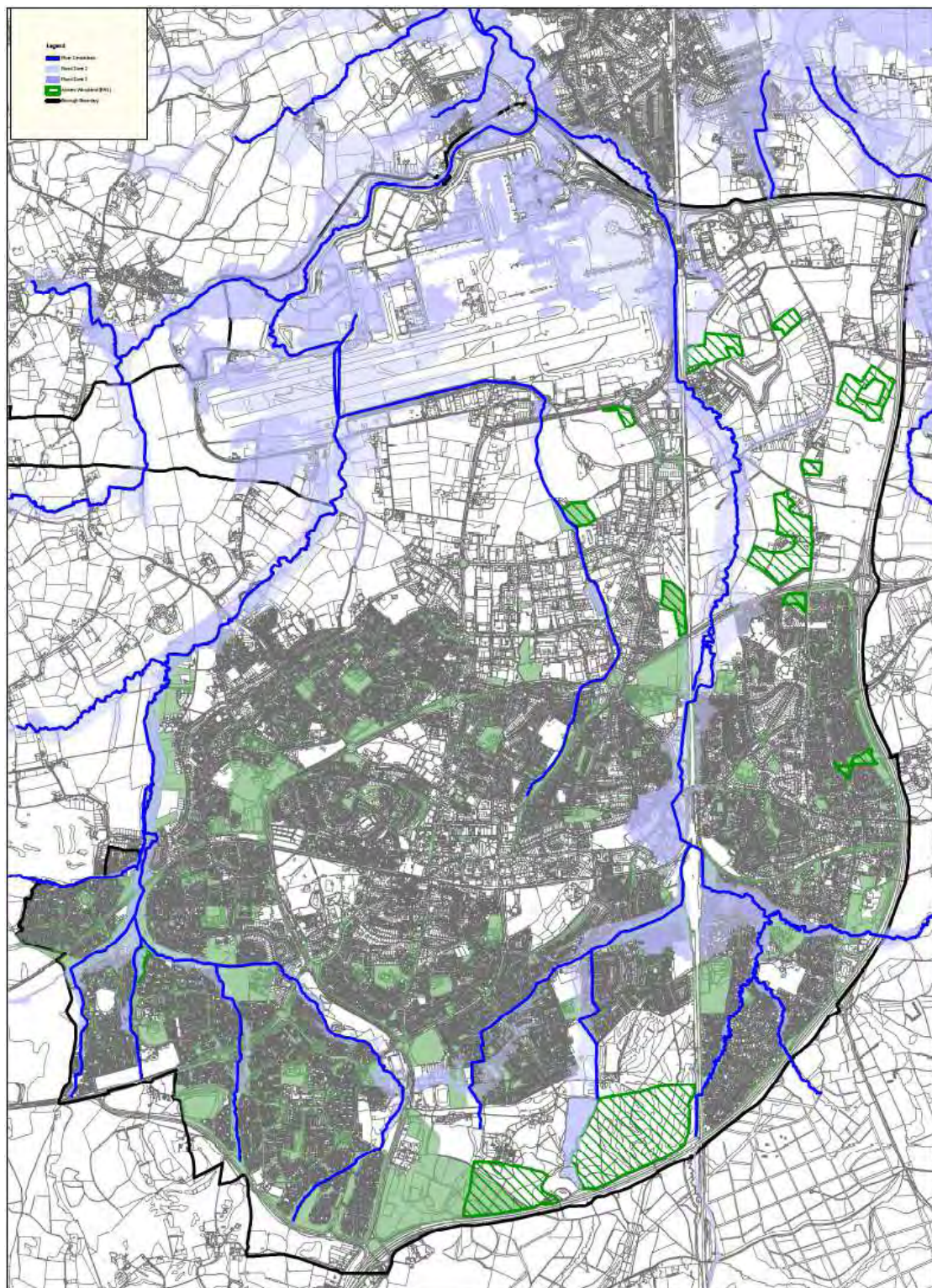
Older People
Ethnic Minorities
Disabled People
Young Mothers

APPENDIX G: MAPS

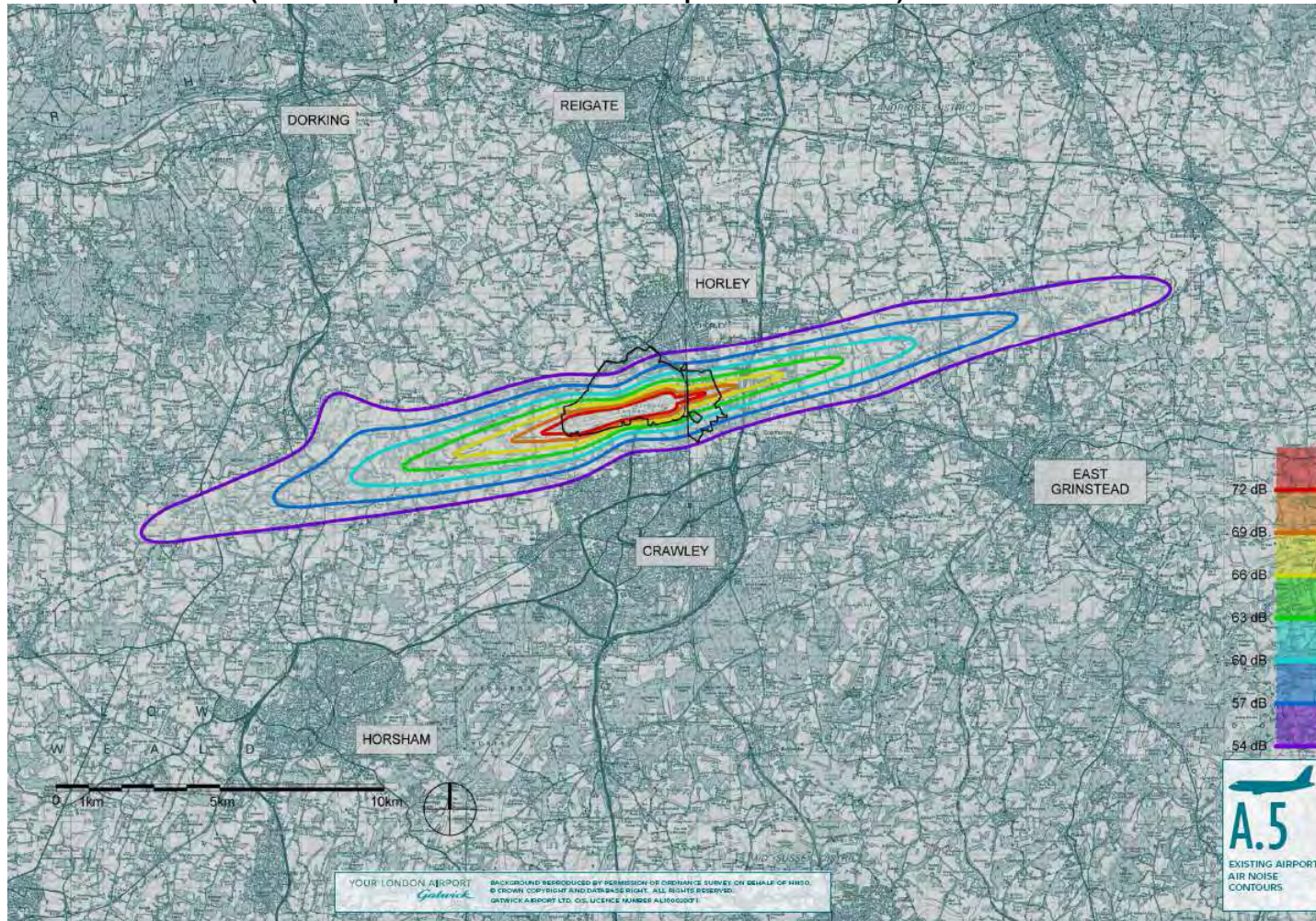
Area of study for future strategic development impact (GL Hearn 2009)



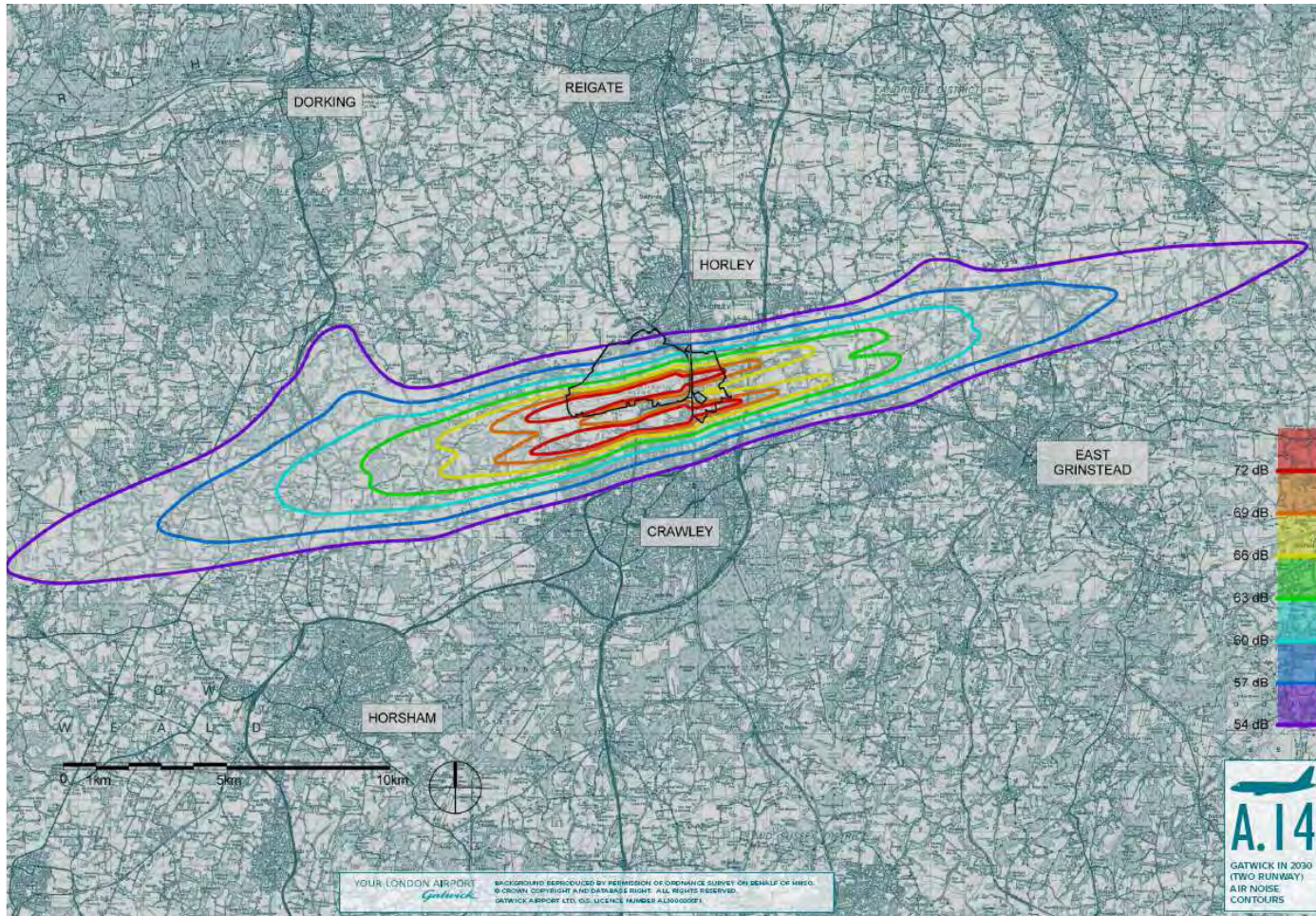
Flood Zones, Amenity Green Space and Ancient Woodland in Crawley



Gatwick Airport Noise contours 2011 (Gatwick Airport Limited Draft Masterplan October 2011)

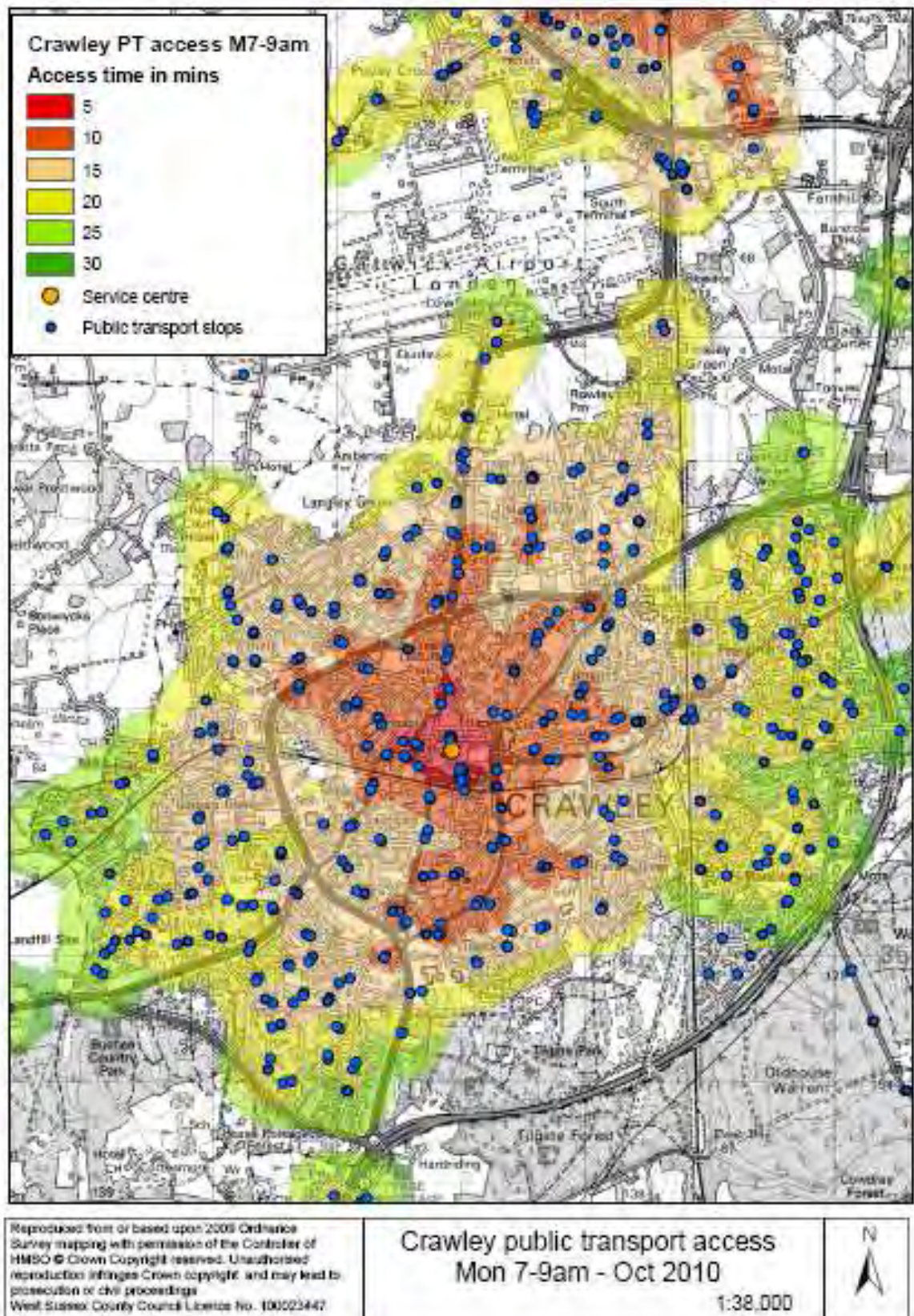


Gatwick Airport Noise contours 2030 (two runways)



(Source: Gatwick Airport Limited Draft Masterplan October 2011)

Accession Modelling 2010. Crawley AM peak hour accessibility to the town centre using public transport



Indices of Multiple Deprivation. Crawley 2010

Deprivation Rank
(national ranking)

