

CRAWLEY BOROUGH COUNCIL

**SUSTAINABILITY APPRAISAL /
STRATEGIC ENVIRONMENTAL
ASSESSMENT**

**Sustainability Report for the Submission
Local Plan**

November 2014

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Non-Technical Summary

1. Crawley Borough Council (the 'council') is reviewing its Local Plan (the adopted Core Strategy, 2008, and 'saved' Local Plan policies, 2000). Crawley's new Local Plan sets out policies to guide both strategic development and development management over the period 2015-2030. The Local Plan establishes development proposals within the borough, including the long-term housing and employment land supply position for the Plan period up to 2030. It includes policies to guide the location and type of new development and to protect valued elements of the natural and built environment; and sets out mechanisms for the implementation of infrastructure supporting it.
2. The Planning and Compulsory Purchase Act (2004) requires Local Planning Authorities (LPAs) to carry out a Sustainability Appraisal for all Development Plan documents to ensure that the plan is designed in a sustainable manner. This process involves examining the likely effects of the plan and considering how they contribute to the environmental, social and economic wellbeing of the town. Where problems are identified, mitigation measures should be proposed and put into practice.
3. The Strategic Environmental Assessment (SEA) aims to predict and assess the environmental effects that are likely to arise from plans, policies and land use strategies, such as this Local Plan. The process involves the assessment and mitigation of negative environmental impacts of specific plans and programmes. For the purposes of this Sustainability Appraisal, the SEA has been incorporated into this report. Therefore, where the report refers to the SA, it can be assumed this also means the SEA.
4. This non-technical summary of the Sustainability Appraisal (SA) Report informs consultees and the general public about the process of the Sustainability Appraisal in plain English, avoiding the use of technical terms. A glossary of the main terms used is listed at Appendix A of this report. The production of a non-technical summary is a requirement of an EU Directive known as the 'SEA Directive'.

Baseline Data

5. In order to carry out the Sustainability Appraisal of the Local Plan document, information was collected and analysed to establish what the town is like currently. This is known as 'baseline data' and is primarily collected from the council's own records and the latest Census (2011). This information helps to build a picture of the successes and challenges facing the town to understand sustainability issues within Crawley, and predict how things may change in the future if the Local Plan was not to be implemented. The overall findings can be summarised as follows:

Economy

Crawley is firmly established as one of the key economic drivers in the south east of England. The town's economy is generally strong, with over 30,000 people employed at the Manor Royal Business District, but with a large amount of in-commuting to the town. This dynamic is partly attributed to local skills not matching the requirements of local businesses.

Social

In Crawley, owing to the administrative and environmental constraints of the borough, land supply is limited for new homes, and the need for new homes will outstrip supply. Generally, the borough has low levels of deprivation, although there are several pockets of deprivation to the west of the borough. Although the perception of crime within the borough is high, actual crime has reduced significantly in recent years. Lastly, compared to the majority of West Sussex districts, education levels are

low, although the percentage of residents with no qualification has also lowered in recent years.

Environment

Overall the borough has a high quality built and natural environment. There is one Area of Outstanding Natural Beauty which extends into the borough to the south; the High Weald. In addition, there is a range of other local environmental designations, including six Local Nature Reserves and 12 Sites of Nature Conservation Importance. However, there are threats to the environment as a result of pollution from Gatwick Airport and the busy transport interchanges within Crawley, and development pressures.

Sustainability Issues for Crawley

6. The baseline information presented in Appendix D, and the evidence base produced to underpin the Local Plan policies, have helped to inform the sustainability issues affecting the borough. The sustainability issues for Crawley are as follows:

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 increase.
Climate Change	Crawley as a dense urban area has a high level of anticipated development, whilst also being identified as an area of radiant energy and subject to serious water stress.
Waste	Crawley has no strategy for managing commercial and industrial waste.
Flooding	The concentration of new development in Crawley and the surrounding area could 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 the international airport, maintenance of air quality may become increasingly problematic.
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 complicated by the uncertainty surrounding the future expansion of Gatwick Airport.
Attractiveness	There is a need to ensure Crawley remains a place where people want to live and invest, in order to enhance the quality of life and encourage economic growth.
Housing Delivery	The economic downturn has seriously affected the delivery of new housing in recent years, although that trend may be changing as the economy improves.
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 older building stock and the current needs of the changing economy, both within the dedicated business areas and 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-related 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 natural 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 provision.
Community Facilities	The changing population demographics in the area is creating a mismatch between the need for housing and community facilities and current provision.
Ethnic Diversity	The ethnic structure of the population within 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.

Sustainability Objectives

7. In order to assess how the Local Plan, and its associated policies, allocations and designations contribute to sustainable development, a set of Sustainability Objectives were developed. These are set out below:

Sustainability Objectives
1. To mitigate climate change, by taking actions to reduce the concentration of greenhouse gasses in the atmosphere.
2. To adapt to the effects of climate change, by reducing the negative consequences of changes in the climate on people and the environment, or by achieving a positive outcome from the effects of climate change.

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.
4. To ensure that everyone has the opportunity to live in a decent and affordable home.
5. To maintain, support and promote a diverse employment base that can serve the local and sub-regional and regional economy.
6. To conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough.
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.
8. To ensure the provision of sufficient infrastructure to meet the requirements of the borough.
9. To promote healthy, active, cohesive and socially sustainable communities.
10. To ensure everyone has the opportunity to participate in sport and to encourage active lifestyles.

Identification and Assessment of Policies and Options

8. In order to ensure that the Local Plan addresses the sustainability issues identified within this Sustainability Appraisal report, each planning policy contained within the Local Plan was assessed against the Sustainability Objectives, and the reasonable alternative options for each policy were also assessed. This normally included a 'do-nothing' option of not having a policy on a specific subject. In all cases, the assessment found that that it would be more sustainable to have a policy than not to have a policy, since this could lead to uncontrolled development, which could harmfully impact the economy, the environment and create social problems.
9. In addition, it was determined that the chosen option would not, in all cases, be the most sustainable, since a more sustainable policy option could be non-compliant with national planning legislation, or there might be development viability or deliverability concerns. Therefore, the submission Local Plan policies chosen are believed to be the most sustainable given all reasonable and realistic alternatives.
10. Each policy was assessed against the separate Sustainability Objectives, against a simplified criterion as detailed below:

	Significant Positive Impact (++)
	Positive Impact (+)
	Possible Positive or Slight Positive Impact (+?)
	No Impact (0)
	Neutral Impact (/)
	Uncertain Impact (?)
	Possible Negative or Slight Negative Impact (-?)
	Negative Impact (-)
	Significant Negative Impact (--)

Summary of Key Findings and Significant Effects

11. Following the assessment of each policy, the results were tabulated (see Appendix F for details), which meant that it was possible to identify complementary policies and

where there were areas of conflict. The main findings from this Sustainability Appraisal were as follows:

- The policies protecting the environment and the character of the borough work harmoniously to protect both the built and natural environment. However, the combined effect of these policies limits the overall amount of land which is available for development. Key housing sites and employment areas have been identified within the Local Plan to meet as much of the objectively assessed needs for the borough as is considered to constitute sustainable development, following site-specific Sustainability Appraisals for each proposed or rejected development site.
 - In some circumstances, it was not possible to make any firm conclusions regarding either the positive or negative effects of a policy on a number of sustainability objectives. Indeed, the effects of policies on levels of crime, or the decision of private enterprises to locate within the town, are only partly based on planning policies contained within the Local Plan.
 - The majority of policies have combined to have an overall positive impact for the economy. It is clear from the evidence base that the policies directly protecting employment sites will assist the local and sub-regional economy, and policies protecting the environment and character of Crawley will sustain the borough's attractiveness, thereby encouraging people to live and work in Crawley.
12. The Sustainability Appraisal process and commentary was undertaken continuously throughout the plan-making process, particularly as new evidence was gathered to support the Local Plan policies. In brief, the assessment of the Local Plan policies generally found that policies had positive effects for social and economic Sustainability Objectives, but had uncertain or less positive impacts for the environment. This was expected when considering the pressing need for both additional housing and employment space within the borough.
13. Once the individual and joint impacts of policies within the Local Plan had been assessed, the most significant impacts were identified. In general, it is considered that the most significant effects arising from the Local Plan are as a result of new development needs (predominantly housing and employment needs).
14. Significant effects arising from the Local Plan included the potential harm to the environmental designations (such as the High Weald Area of Outstanding Natural Beauty (AONB)), and an increase in infrastructure need (such as transport, education or health facilities) owing to new development. More beneficial impacts include an increase in the number of affordable homes, and the maintenance and improvement of the character of Crawley, retaining the neighbourhood principle approach.

The Mitigation of Policies with Negative Effects

15. In order to minimise the negative effects of the chosen policies identified within both Local Plan and this Sustainability Appraisal, a number of mitigation measures have been identified and incorporated (see Appendix F for full details). The main mitigation measures are as follows:
- Other policies within the Local Plan have the potential to counteract the negative impacts of policies on particular Sustainability Objectives.
 - Through the Sustainability Appraisal process, amendments to the wording of Local Plan policies have reduced the potential negative impact.
 - The main negative effects arising from the proposed policies and allocations/designations will be given further consideration and mitigated against

within other Local Plan policy documents, such as Supplementary Planning Documents (SPD).

- In particular, environmental impacts can be mitigated against at the planning application stage, either through in-depth biodiversity reports and/or an Environmental Impact Assessment (EIA). Planning conditions could also play a small role in ensuring that the potential negative effects of development are resolved.

Monitoring

16. The findings of this Sustainability Appraisal were taken into account in the preparation of the Local Plan. To measure the impact of the Local Plan document, including the effects on the sustainable development of the borough, the Local Plan will be monitored. The monitoring will be undertaken on an annual basis and will be incorporated into Crawley's wider Authority's Monitoring Report (AMR), which assesses the extent to which policies contained within the document that form the Local Plan are being implemented. The first of these monitoring reports would cover the period from 1 April 2015 to 31 March 2016. The findings of this ongoing monitoring reporting process will assist the council in measuring how well the Plan contributes towards sustainable development, and will also inform future reviews of the plans and policies contained within the Local Plan.

1.0 INTRODUCTION

Sustainability Appraisal and Strategic Environmental Assessment

- 1.1 Under the regulations of The Planning and Compulsory Purchase Act (2004), Crawley Borough Council must carry out a Sustainability Appraisal (SA) for the Local Plan to satisfy independent examination and allow the Local Plan to be formally adopted. An EU Directive also requires that a Strategic Environmental Assessment (SEA) is undertaken to ensure that the environmental effects of the Local Plan are taken into account. The SA/SEA identifies the social, environmental and economic impacts of planning policies, allocations and designations.
- 1.2 The Local Plan seeks to promote opportunities for all people in Crawley. The SA/SEA considers the impacts of proposed development options on people's health, and therefore covers the criteria of the Health Impact Assessment. This document, therefore, covers the requirements for a HIA. The SA/SEA also considers 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 considered during the review of the adopted Core Strategy (2008) and the preparation of the new Local Plan (Crawley 2030). The review takes into account the existing legislative framework, the National Planning Policy Framework (NPPF), local technical evidence and consultation feedback, and results in a Local Plan for Crawley to cover the period 2015-2030.
- 1.4 The SA/SEA follows an iterative process, providing a view on the likely implications for sustainable development of different options for policies identified during the preparation of the new Local Plan and the impact of site allocations/designations. The findings of the scoping work, the preferred strategy consultation and the site allocation/designation consultation have been taken into consideration when developing the final policies for Crawley's Local Plan.

Structure of the SA/SEA Report

- 1.5 This SA/SEA report for Crawley's Local Plan 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. In addition, this section provides an overview of the Local Plan, including how documents relate to each other and the timetable for the Local Plan process.
 - Section 3 includes a summary from the consultation on the Scoping Report, the preferred strategy consultation for the Local Plan and the site allocation/designation consultation. A summary of the Sustainability Appraisal topic areas for Crawley's Local Plan, including the Sustainability Objectives are contained within this section.
 - Section 4 provides a more detailed analysis of the social, environmental and economic effects of the policies included in the Submission Local Plan against the Sustainability Objectives. In addition, a detailed assessment of the allocations/designations contained within the Local Plan against the Sustainability Objectives is summarised.
 - Section 5 sets out the proposed methodology for implementing the findings of the SA, any mitigation required and finally, the proposed monitoring framework to be used to assess the sustainability of the policies as they are implemented.

Consultation Arrangements

- 1.6 Consultation on this submission Sustainability Appraisal is running concurrently with the consultation on the submission Local Plan 2015-2030, and a Habitats Regulations Assessment Report (HRA). This is a six-week public consultation which forms the statutory formal 'publication' consultation of the Local Plan.
- 1.7 This document will be available for a six week public consultation period on **1 September 2014**. We welcome any comments on this Submission Sustainability Appraisal. Should you wish to comment on the document, please do so on or before **5pm, 13 October 2014**. All comments will be forwarded to the Planning Inspector for consideration during the Local Plan's Examination.
- 1.8 Responses must be provided in writing and on the council's Local Plan representation form. The form is available at the locations identified in paragraph 1.11 below, by request to the council's Forward Planning team, or from the council's website. There are three ways in which the representation form can be submitted:
- Electronically by using the council's website eform: www.crawley.gov.uk/crawley2030
 - 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 Elizabeth Brigden on (01293) 438624 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/crawley2030
- 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 for 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 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 government has continued with this process and produced a further document, named 'Government Progress in Mainstreaming Sustainable Development' (Defra, May 2013), which states that a key principle underlying the government's approach to sustainable development is that growing the economy and improving the environment can be mutually supportive.

- 2.6 The NPPF (Para 14) articulates the government's presumption in favour of sustainable development and confirms it as the overriding principle of planning, which should be seen as a golden thread running through both plan-making and decision-taking.

Strategic Environmental Assessment and Sustainability Appraisal

- 2.7 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.

- 2.8 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 should be proposed and put into practice. This can therefore improve the overall sustainability of the plan being prepared.
- 2.9 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 jointly 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 (contained within the European Directive 2001/42/EC Annex 1) have been met within this report.

Table 2.1 SA/SEA Report and conformity with SEA Directives

SEA Directive Requirements	Location within Report
<p>Annex 1 A An outline of report contents, the main objectives of the plan and the relationship with other plans and programmes.</p>	<p>Section 1, Section 2 and Section 3</p>
<p>Annex 1 B The current state of the environment & likely evolution thereof without the implementation of the plan.</p>	<p>Appendix D, E & F</p>
<p>Annex 1 C Environmental characteristics of areas likely to be significantly affected.</p>	<p>Section 5; Appendix E & F</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; Appendix D</p>
<p>Annex 1 E Environmental protection objectives, established at international, national or community level and the way those objectives and any environmental considerations have been taken into account during its preparation.</p>	<p>Section 3 and 4</p>

<p>Annex 1 F</p> <p>The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and interrelationship between the above factors.</p>	Section 4 and 5; Appendix E & F
<p>Annex 1 G</p> <p>The measures envisaged to prevent, reduce and as fully as possible, offset any significant adverse effects on the environmental of implementing the plan.</p>	Section 4 and 5; Appendix E
<p>Annex 1 H</p> <p>An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties encountered in compiling the required information.</p>	Section 5; Appendix E & F
<p>Annex 1 I</p> <p>A description of the measures envisaged concerning monitoring.</p>	Section 4; Appendix E
<p>Annex 1 J</p> <p>A non-technical summary of the information provided within the SA/SEA report.</p>	Non-Technical Summary

Habitats Regulations Assessments (HRA)

- 2.10 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. The 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 Ashdown Forest Special Area of Conservation (SAC) and the Mole Gap to Reigate Escarpment lie within 15km from 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. Where negative effects are identified, other options should be examined to avoid any potential damaging effects.
- 2.11 In tandem with the Draft Sustainability Appraisal Scoping Report (January, 2012) for the Local Plan Issues and Options consultation, the council also prepared a HRA Screening Report. The findings of the HRA screening report suggested that there was no significant likelihood of adverse impacts (either on their own or ‘in combination’ with other plans) on European Sites from the implementation of the plan.
- 2.12 Following advice from Natural England, the council undertook a Stage 1 Transport Modelling (August, 2012) exercise, which advised on the potential traffic impacts on the Ashdown Forest SAC. The transport modelling exercise demonstrated that there was not a significant likelihood of adverse impacts upon the Ashdown Forest in terms of air quality. Subsequently, in agreement with Natural England, the council has not undertaken an ‘Appropriate Assessment’ in view of the negligible impact upon European Sites outside the borough.

2.13 Further information is available in the HRA screening report that is available alongside the submission of the Local Plan and can be viewed at www.crawley.gov.uk/crawley2030.

Methodology

2.14 For the first stage of the SA/SEA scoping report for the Local Plan, the council collected contemporary information on social, environmental and economic issues in the borough. This is formally known as 'baseline' data. This information was collected from monitoring undertaken in the past, and other sources, and enabled the key issues facing the borough to be identified. Since the SA/SEA is an iterative process, updated baseline data has been utilised where appropriate.

2.15 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 the international to local level. The documents also provided further information about the borough, which was included in the baseline data.

2.16 In 2009, as part of the Core Strategy Review, a Topic Paper specifically relating to the Sustainability Appraisal/Strategic Environmental Assessment and Habitat Regulation Assessment was consulted on. This set out an indication of the proposed direction at that stage and a number of key questions setting out the main issues for consultation. This topic paper was updated and re-issued during the Local Plan Issues and Options consultation in early 2012, alongside the Scoping Report.

2.17 The council received feedback on the Scoping Report through consultation undertaken between 19th January to 1st March 2012, which accompanied the 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.

The proposed changes and the officer responses to any changes made are summarised at Appendix B.

2.18 From this information, Sustainability Objectives were identified, against which the proposed Local Plan policy options were assessed. The Sustainability Objectives were compared with each other and against the overall objectives of the Local Plan during the preparation of the preferred strategy document. This process enabled any conflicts between the objectives to be identified. By identifying these conflicts possible ways of reducing or resolving them between Local Plan policies and sustainable development were identified.

2.19 For the draft sustainability report for the Local Plan Preferred Strategy, each Local Plan policy had been considered individually against the SA Objectives and the options available for each policy were also assessed. In considering the policy options available to the council, planning officers endeavoured to ensure that the most sustainable option was preferred, unless other considerations dictated (for example, the most sustainable option could threaten the economic viability of new development within the plan* or the option could be non-compliant with planning legislation).

2.20 The council received feedback on the draft SA report with the Local Plan Preferred Strategy that was consulted upon between 22 October and 3 December 2012. The

* NPPF, 2012, Para 173-177

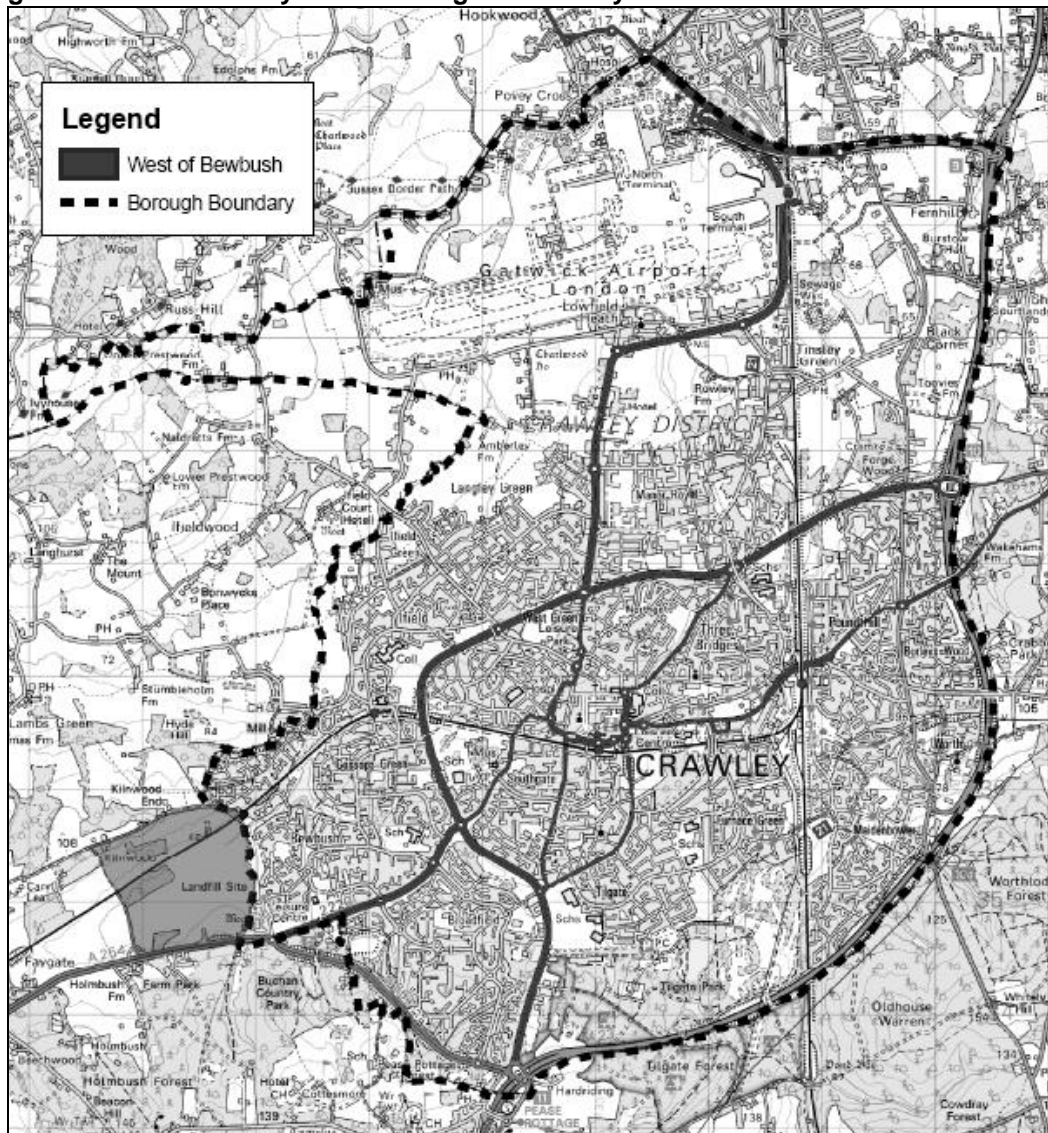
consultation responses proposed additional plans and policies that could be incorporated within the SA, and moreover, suggested reasons why certain policies should be assessed differently against the SA objectives. The proposed changes and the officer responses to any suggested changes received are summarised at Appendix C.

- 2.21 The council also received feedback on an additional sites consultation, carried out between 3 June and the 1 July 2013, which also had an accompanying site specific Sustainability Appraisal based upon the draft SA report with the Local Plan Preferred Strategy. Although a large number of representations were received at this stage, there were no specific comments regarding the accompanying SA.

Plan Area

- 2.22 The Local Plan only applies across the administrative boundary of Crawley borough. However, the West of Bewbush Joint Area Action Plan (JAAP) adopted in July 2009 extends beyond Crawley’s boundary into Horsham’s administrative area, and the combined impacts of development at this site have been considered as part of the evidence base for the Local Plan. Figure 2.1 shows the borough boundary, and the area covered by the West of Bewbush JAAP, considered by the SA.

Figure 2.1: SA Boundary - The Borough of Crawley



3.0 OVERVIEW OF THE LOCAL PLAN

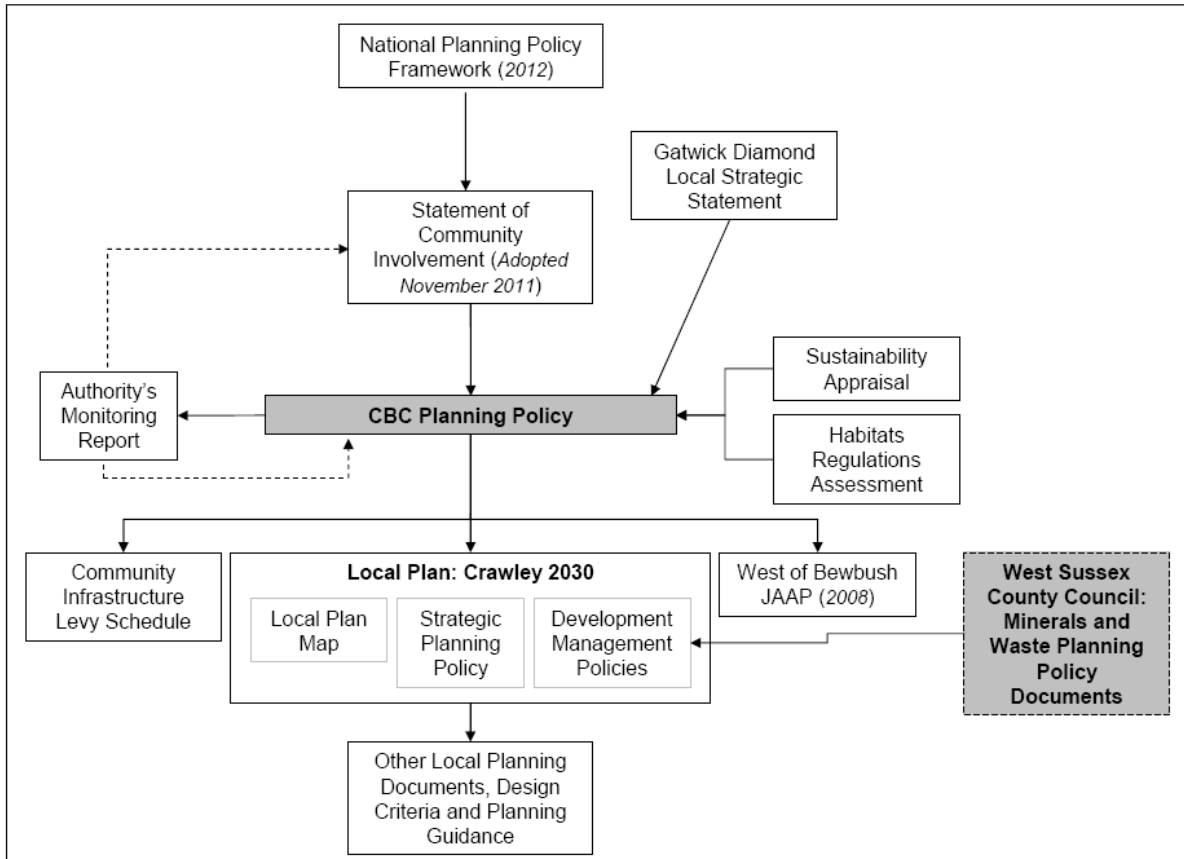
Introduction

- 3.1 Crawley Borough Council is reviewing its Local Plan (the adopted Core Strategy, 2008, and 'saved' Local Plan policies, 2000). Crawley's new Local Plan sets out policies to guide both strategic development and development management, over the period 2015-2030.

Crawley's Local Plan

- 3.2 Key aims of the Local Plan will be to ensure that the borough continues to develop in a sustainable way, and to implement the presumption in favour of sustainable development in a locally appropriate manner.
- 3.3 Crawley currently has a Local Plan that comprises the adopted Core Strategy (2008); the policies that have been 'saved' from the Local Plan (2000); and the West of Bewbush JAPP. There are also a number of adopted Supplementary Planning Documents (SPD) that cover subjects such as the town centre 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 legislation, the National Planning Policy Framework (NPPF) and national planning guidance, and the Gatwick Diamond Local Strategic Statement.
- 3.5 Crawley's new Local Plan (Crawley 2030) will respond to changing 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 development of a new neighbourhood, Forge Wood, in the North East Sector of the town.
- 3.6 The Sustainability Report was available for consultation in tandem with the submission Local Plan. The Local Plan addresses development proposals within the borough, including the long-term housing and employment land supply position for the Plan period up to 2030. It includes policies to guide the location and type of new development and to protect valued elements of the natural and built environment; it sets out mechanisms for the implementation of infrastructure supporting it. Although the SA was prepared in tandem with the Local Plan, its focus is not solely upon the Plan, but will also be used to appraise all subsequent documents, including Supplementary Planning Document's (SPD).
- 3.8 The review of Crawley's adopted Local Plan affords the council the opportunity to prepare a new SA framework, building upon the lessons learnt during the preparation of the Core Strategy. A simplified diagram of the key documentation proposed to accompany the adopted Local Plan is shown at Figure 3.1

Figure 3.1: CBC Planning Policy – relationship between documents



3.9 Within the Topic areas listed in the Appendix D, the plans, and programmes most relevant are highlighted in detail.

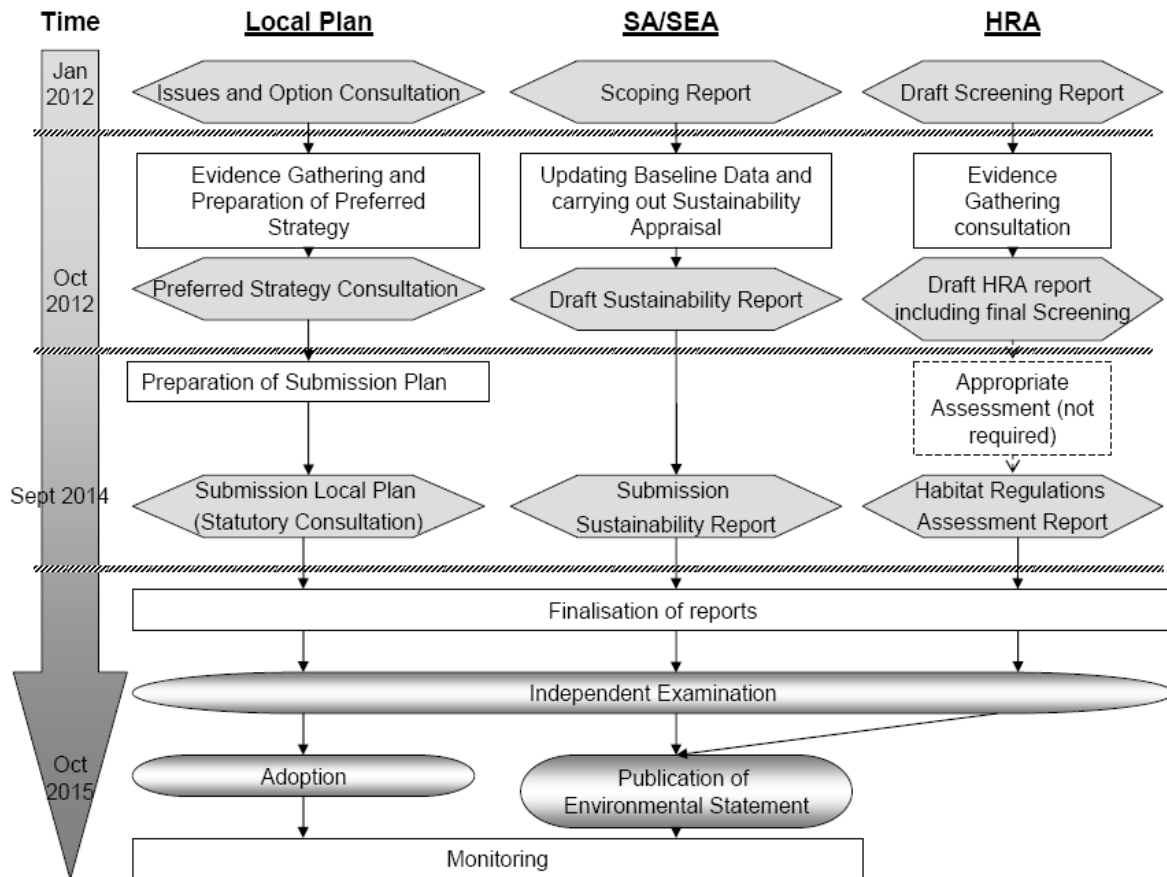
3.10 The timetable for the adoption of the Local Plan is shown in Table 3.1.

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	3 June – 1 July 2013
Submission consultation	1 September – 13 October 2014
Submission	26 November 2014
Examination in Public	March/April 2015
Adoption	October/November 2015

3.11 Figure 3.2 shows how the SA and HRA timetables have aligned with the Local Plan production.

Figure 3.2: SA and HRA production with the Local Plan



3.12 The Local Plan objectives were determined through assessment of the evidence base and the consultation feedback at each stage. The following objectives for the planning and delivery of development in Crawley have been identified. These objectives were considered during the Sustainability Appraisal exercise:

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 326 homes each year from 2015 to 2030.

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

Objective 7: To ensure that 40% 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 by reducing the negative consequences on people and/or the environment, such as reducing flood risk, future proofing the built environment and the positive management of natural 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 borough, to the north of Gatwick Airport.
- 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 after 1947 when it was designated as one of the eight 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 Crawley, and construction has commenced on two more; Kilnwood Vale at land west of Bewbush, in Horsham district; and Forge Wood, at the North East Sector of the town.
- 4.4 As a result of the planned approach to development, the town has extensive tree cover, structural landscaping 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 a '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 took into account the Secretary of State's issuing of a North East Sector decision (and subsequent challenge period), and allowed the objectives and requirements of the Localism Act to be reflected in the new Local Plan.
- 4.7 The new Local Plan Programme, known as Crawley 2029, began with an additional revised Issues and Options consultation. From 19 January to 1 March 2012 residents, community groups, businesses and other stakeholders were asked about the key issues facing the town now and what they would like to see 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 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 of this report. The comments fed into the preparation of the draft Sustainability Appraisal for the preferred strategy Local Plan.

Preferred Strategy Consultation

4.9 From 22 October to 3 December 2012 the council published a draft Preferred Strategy Local Plan that residents, businesses and other stakeholders were invited to comment upon. This document set out the council's Preferred Strategy for the Local Plan, and contained draft planning policies and principles to help shape the future of the town. This included issuing a draft Sustainability Report, which covered both the Sustainability Appraisal and the Strategic Environmental Assessment requirements and a Habitats Regulation Report.

4.10 The responses to the whole of the consultation undertaken in late 2012 has 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 comments received relating to draft Sustainability Report can be found in Appendix C of this report. The comments have fed into the preparation of this Sustainability Appraisal report for the Submission Local Plan.

Site Allocation Consultation

4.11 In addition to the consultation for the Preferred Strategy Local Plan, an additional stage of consultation was held between 3 June and 1 July 2013, which consulted on additional sites identified for development or changes to protective designations. Again, residents, businesses and other stakeholders were asked to consider a number of potential designations, allocations, and changes to designations as part of the consultation. This included the issuing of a focused site-specific Sustainability Appraisal, as allocations for housing, Gypsy and Traveller sites, and the designations of sites for greater protection have the potential to have social, environmental and economic effects.

4.12 While the assessment of the consultation sites included a Sustainability Appraisal, the comments received only considered the site as whole rather than the particulars of Sustainability Appraisal, and as such, the comments from this consultation have not been appended. However, a summary of all the comments received relating to the sites allocation consultation can be found at www.crawley.gov.uk/crawley2030.

Publication Consultation

4.13 A final draft version of the Sustainability Report for the submission Local Plan was available for statutory consultation alongside the Plan over the 6-week period 1 September – 13 October 2014 (August 2014 version). This has been subject to some technical and factual updates for its final, current form (November 2014 version). These have not resulted in any changes to policy assessments and conclusions.

Sustainability Appraisal Topic Areas

4.14 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 ten overarching Sustainability Objectives that have been considered when proposing any development options or policies for the Local Plan. Ideally, sustainable development in Crawley would result in positive effects upon all the objectives identified, although in reality, it is likely that compromises will have to be found and mitigation implemented to find a balance between the social, economic and environmental needs.

- 4.15 The baseline data draws upon the evidence base gathered for the development of the Local Plan and the existing information and statistics available from monitoring data. Statistics and trends are quoted from information available at the time of writing.
- 4.16 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 within 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. However, where conflicts between plans, policies and programmes exist, the council has aimed to identify them during Sustainability Appraisal process.
- 4.17 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	
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 Airport, infrastructure	
G	Population, Community Facilities and Open Spaces, Crime and Health of the Community	demographics, educational establishments, community halls, open space, sport and recreational provision	<i>Population, Human Health</i>

Current Sustainability Issues

- 4.18 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

	increase.
Climate Change	Crawley as a dense urban area has a high level of anticipated development, whilst also being identified as an area of radiant energy and subject to serious water stress.
Waste	Crawley has no strategy for managing commercial and industrial waste.
Flooding	The concentration of new development in Crawley and the surrounding area could 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 the international airport, maintenance of air quality may become increasingly problematic.
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 complicated by the uncertainty surrounding the future expansion of Gatwick Airport.
Attractiveness	There is a need to ensure Crawley remains a place where people want to live and invest, in order to enhance the quality of life and encourage economic growth.
Housing Delivery	The economic downturn has seriously affected the delivery of new housing in recent years, although that trend may be changing as the economy improves.
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 older building stock and the current needs of the changing economy, both within the dedicated business areas and 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-related 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 natural 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 provision.
Community Facilities	The changing population demographics in the area is creating a mismatch between the need for housing and community facilities and current provision.
Ethnic Diversity	The ethnic structure of the population within 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 Monitoring Indicators

- 4.19 Taking the sustainability issues as a starting point, it was possible to identify the proposed Sustainability Objectives for Crawley. The objectives have been used to assess how the various policy options explored for the Local Plan could contribute to the sustainable development of the borough: comparing each policy or proposal's effects on each objective. The objectives, and the indicators that could be used to monitor the effects of the Plan against the objectives, are shown Table 4.3.

Table 4.3: Sustainability Objectives and Monitoring Indicators

Objectives	Indicators
1. To mitigate climate change, by taking actions to reduce the concentration of greenhouse gasses in the atmosphere.	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, by reducing the negative consequences of changes in the climate on people and the environment, or by achieving a positive outcome from the effects of climate change.	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

Objectives	Indicators
	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.
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 SE `Plan 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.

4.19 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	All SA Objectives

Local Plan Objective	Sustainability Objective
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 326 no. homes each year from 2015 to 2030.	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.
Objective 7: To ensure that 40% 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.

Local Plan Objective	Sustainability Objective
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 mitigate climate change, by taking actions to reduce the concentration of greenhouse gasses in the atmosphere by reducing or eliminating emissions at the source, and/or capturing greenhouse gases.
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 mitigate climate change, by taking actions to reduce the concentration of greenhouse gasses in the atmosphere by reducing or eliminating emissions at the source, and/or capturing greenhouse gases.
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.
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.	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.
Objective 20: To conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough.	6. 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 by reducing the negative consequences on people and/or the environment, such as reducing flood risk, future proofing the built environment and the positive management of natural resources.	2. To adapt to the effects of climate change by reducing the negative consequences on people and/or the environment, such as reducing flood risk, future proofing the built environment and the positive management of natural resources.

5.0 Submission Local Plan Policy and Site Allocation/Designation Appraisal

Submission Local Plan Policy Appraisal Summary

- 5.1 The strategic spatial strategy was assessed against the sustainability objectives, following results from consultation and technical evidence base information. It is considered to be the most appropriate strategy when considered against the reasonable alternatives and offers the most sustainable approach for the future of the borough. The details relating to this and the sustainability appraisal of the options (alternative scenarios) are set out in Appendix E.
- 5.2 Each 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 F to this report. The overview of this broad sustainability appraisal assessment of the submission policies can be seen below in Table 5.1.
- 5.3 Each policy was assessed against the separate Sustainability Objectives, against a simplified criteria of:

	Significant Positive Impact on the sustainability objective (++)
	Positive Impact on the sustainability objective (+)
	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 (?)
	Possible Negative or Slight Negative Impact on the sustainability objective (-?)
	Negative Impact on the sustainability objective (-)
	Significant Negative Impact on the sustainability objective (--)

- 5.4 Detailed commentary is provided in Appendix E and F to explain the reasons behind the assessment in each case.
- 5.5 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 mitigation to minimise or neutralise the outstanding potential negative impacts. In addition, it was determined that the chosen option may not, in all cases, be the most sustainable, since a more sustainable policy option could be non-compliant with national planning legalisation (including the NPPF) or there might be viability concerns.
- 5.6 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.

Summary of Key Findings and Significant Effects

- 5.7 The outcome of the final option chosen for the Spatial Strategy was a combination of Scenarios 2 (Sub-Regional Focus) and 3 (Crawley borough Focus). In this way the negative effects associated with each option are mitigated and minimised as far as possible.

“A combination of Scenarios 2 and 3 were chosen to create a realistic and deliverable Local Plan which maximises sustainable development opportunities whilst protecting the quality of the environment for local residents, businesses and visitors”.

5.8 Following the assessments of each policy, the results were tabulated (see Appendix E for details), which meant that it was possible to identify complementary policies and where there were areas of conflict. The main findings from this Sustainability Appraisal were as follows:

- The policies protecting the environment and the character of the borough work harmoniously to protect the both built and natural environment of the borough. However, the combined effect of these policies limits the overall amount of land which is available for development. Key housing sites and employment areas have been identified within the Local Plan to meet as much of the objectively assessed needs for the borough as is considered to constitute sustainable development, following site-specific Sustainability Appraisals for each of the proposed or rejected development sites.
- In some circumstances, it was not possible to make any firm conclusions regarding either the positive or negative effects of a policy on a number of sustainability objectives. Indeed, the effects of policies on levels of crime, or the decision of private enterprises to locate within the town, are only partly based on planning policies contained within the Local Plan.
- The majority of policies have combined to have an overall positive impact for the economy. It clear from the evidence base that the policies directly protecting employment sites will assist the local and sub-regional economy, and policies protecting the environment and character of Crawley will sustain the borough’s attractiveness, thereby encouraging people to live and work in Crawley.

5.9 The Sustainability Appraisal process was undertaken continuously throughout the plan-making process, particularly as new evidence was gathered to support the Local Plan policies. In brief, the assessment of the Local Plan policies generally found that policies had positive effects for social and economic Sustainability Objectives, but had uncertain or less positive impacts for the environment. This was expected when considering the pressing need for both additional housing and employment space within the borough.

5.10 Once the individual and joint impacts of policies within the Local Plan had been assessed, the most significant impacts were identified. In general, it is considered that the most significant effects arising from the Local Plan are as a result of new development needs (predominantly housing and employment needs).

5.11 Significant effects arising from the Local Plan included the potential harm to the environmental designations (such as the High Weald Area of Outstanding Natural Beauty (AONB)), and an increase in infrastructure need (such as transport, education or health facilities) owing to new development. More beneficial impacts include an increase in the number of affordable homes, and the maintenance and improvement of the character of Crawley, which still retains its neighbourhood principle approach.

Table 5.1: Local Plan Policies Sustainability Appraisal Overview

Local Plan Policy	SA Objective									
	1	2	3	4	5	6	7	8	9	10
SD1	++	++	++	+	+	++	++	++	++	++
CH1	++	+	++	++	+	+	++	++	++	++
CH2	+	+	++	+	+	+	+	+	+	+
CH3	++	++	++	+	+	+	++	+	+	+

Local Plan Policy	SA Objective									
	1	2	3	4	5	6	7	8	9	10
CH4	+	+	+	++	++	+	+	+	+	/
CH5	+	+	++	++	0	+	0	0	+	+
CH6	++	++	++	/	/	++	+	/	+	+
CH7	+	+	+	+	+	++	+	+	+	+
CH8	+	+	++	?	?	++	+	+	+	+
CH9	+	?	+	?	/	+	+	?	+	+
CH10	?	?	+	?	?	++	0	+	+	+
CH11	0	0	+	0	0	+	++	+	+	++
CH12	/	/	++	0	0	0	0	0	0	0
CH13	/	/	++	0	0	0	0	0	0	0
CH14	/	/	++	?	0	0	0	0	0	0
CH15	/	/	++	?	0	0	0	0	0	0
CH16	/	/	++	?	0	0	0	0	0	0
CH17	0	0	+	-?	0	+	0	0	0	+
EC1	?	?	0	+	++	?	++	+	+	0
EC2	+	+	0	+	++	0	+	+	0	+
EC3	+	+	++	0	++	0	+	+	+	+
EC4	0	0	++	++	++	?	++	+	++	++
EC5	0	0	+	+	++	0	++	+	++	+
EC6	+	+	+	++	++	0	++	+	++	+
EC7	++	+	++	0	++	0	++	+	+	0
EC8	+	+	+	?	+	0	+	+	+	0
EC9	+	0	+	0	++	0	-	0	+	0
H1	0	+	+	-	+	+	+	0	+	0
H2	0	+	+	+	0	+	+	+	+	0
H3	0	0	0	+	0	0	0	0	+	0
H4	0	0	0	++	0	0	0	0	++	0
H5	0	0	?	+	0	-	0	0	?	0
H6	0	0	0	+	0	0	0	0	+	0
ENV1	+	+	+	0	0	+	0	+	+	++
ENV2	+	+	+	/	/	++	0	+	+	+
ENV3	+	+	0	0	0	++	0	++	++	++
ENV4	?	?	?	+	0	+	+	+	+	+
ENV5	+	+	+	-?	+	+	0	++	++	++
ENV6	++	++	+	+	0	0	0	0	+	0
ENV7	++	+	+	+	0	0	0	++	+	0
ENV8	0	++	++	?	?	++	0	+	+	0
ENV9	++	++	+	+	0	+	0	+	0	0
ENV10	++	++	++	+	0	+	0	0	++	0
ENV11	0	0	0	0	0	0	0	0	+	0
ENV12	++	++	0	0	0	++	0	0	++	0
IN1	+	/	/	/	/	0	+	++	++	+
IN2	+	+	0	0	+	0	+	++	0	0
IN3	+	+	+	?	?	0	++	+	+	+
IN4	+	+	?	?	?	-	+	+	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
- ? Possible negative or slight negative 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

The Mitigation of Policies with Negative Effects

- 5.12 In order to minimise the negative effects of the chosen policies identified within both Local Plan and this Sustainability Appraisal, a number of mitigation measures have been identified and incorporated (see Appendix E for full details). The main mitigation measures are as follows:
- Other policies within the Local Plan have the potential to counteract the negative impacts of policies on a particular Sustainability Objectives.
 - Through the Sustainability Appraisal process, amendments to the wording of Local Plan policies have reduced the potential negative impact.
 - The main negative effects arising from the proposed policies and allocations/designations will be given further consideration and mitigated against within other Local Plan policy documents, such as Supplementary Planning Documents (SPD).
 - In particular, environmental impacts can be mitigated against at the planning application stage, either through in-depth biodiversity reports and/or an Environmental Impact Assessment (EIA). Planning conditions could also play a small role in ensuring that the potential negative effects of development are resolved.

Submission Local Plan Site Allocation/Designation Appraisal Methodology

- 5.13 The Sustainability Appraisal Objectives set out in this report provide the basis for site allocation/designation appraisal. However, individual criteria questions and topics for the site allocation/designation appraisal have been identified. These topics and criteria have been used to assess the various site options being assessed for the Local Plan, and how this could contribute to the sustainable development of the borough more generally. By the very nature of the Sustainability Objectives considered, several of the issues are cross cutting and will impact upon a number of other sustainability issues.
- 5.14 The Sustainability Objectives, key topics, assessment considerations and criteria used for the assessment of the sites for allocation and designation are set out in the table below. It should be noted that these considerations are not definitive, and further more detailed assessment work may be necessary for the detailed design of allocations for planning permission (where applicable).

Table 5.2: Sustainability Objectives, Key Topics and Assessment Considerations and Criteria

Sustainability Objective	Key Topics for Site Allocations	Assessment Criteria
1. To mitigate climate change, by taking actions to reduce the concentration of greenhouse gasses in the atmosphere.	Reduction in Carbon Dioxide Emissions; Reduction in Water Consumption; Reduction in Other Greenhouse Gas Emissions; Environmental Health	<ul style="list-style-type: none"> - Is the construction of the site going to meet high standards of energy efficiency through the Code for Sustainable Homes (CfSH)? - Is the need to travel reduced through the location of the site? - Is the site contaminated or are there pedestrian pathways linking the site with contaminated land? Can the site be remediated? - Is the development impacted by noise (through adjacent road, airport, rail or industrial usage), or will the site itself result in noise increases? - Will the development site impact negatively or positively on air quality? - Will the development maintain or enhance water quality in rivers or groundwater?
2. To adapt to the effects of climate change, by reducing the negative consequences of changes in the climate on people and the environment, or by achieving a positive outcome from the effects of climate change.	Flood Risk and Drainage; Sustainable Development Design; Effective Water Management	<ul style="list-style-type: none"> - Are site proposals located away from areas that are high risk flooding zones, now or in the future? - Are flood prevention measures incorporated into any new development proposal?
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.	Protection and Enhancement of the Built Environment	<ul style="list-style-type: none"> - Would the development proposal impact upon the setting of a Listed Building, Conservation Area or Locally Listed Building? - If so, could a negative impact on the heritage asset be mitigated appropriately?
4. To ensure that everyone has the opportunity to live in a decent and affordable home.	Meeting Housing Need; Meeting Affordable Housing Need; Meeting GTTS Accommodation Need	<ul style="list-style-type: none"> - How does the proposal address housing needs in the borough? - Would the proposal deliver an element of affordable housing? - How does this provision meet the housing needs or the accommodation needs of the GTTS community?

Sustainability Objective	Key Topics for Site Allocations	Assessment Criteria
5. To maintain, support and promote a diverse employment base that can serve the local and sub-regional and regional economy.	Economic Development	<ul style="list-style-type: none"> - Would the development proposal assist in maintaining, supporting or enhancing the local economy of the area?
6. To conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough.	Protection of Environmental Designations; Conservation and Enhancement of Biodiversity Habitats	<ul style="list-style-type: none"> - Would the development proposal impact upon an existing or future environmental designation (such as a SNCI or AONB)? - Will there be any loss to biodiversity, or damage to the landscape as a result of the delivery of the site? - Will there be opportunities for increasing or enhancing environmental habitats through a development site?
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.	Sustainable Transport	<ul style="list-style-type: none"> - Is the site proposal located in close proximity to sustainable transport links in order for the occupants to reach essential services and facilities? - Is the need for a 'private' car reduced? - Is the site close to both a pedestrian and/or cycling network?
8. To ensure the provision of sufficient infrastructure to meet the requirements of the borough.	Infrastructure Provision; Highways/Rail; Water/Sewerage Facilities; Telecommunications; Energy Provision	<ul style="list-style-type: none"> - Would the development increase highway and/or rail usage and would this have a detrimental impact upon highway and/or rail congestion? - What is the capacity of the site to ensure that sewage can be adequately treated? - Would the development site be designed to be connected to high quality telecommunication systems? - Is the site likely to provide additional renewable energy provision as part of the new development? - Is the site close to existing gas/electricity/ water mains? Is there sufficient capacity of current local physical connections?

Sustainability Objective	Key Topics for Site Allocations	Assessment Criteria
9. To promote active, cohesive and socially sustainable communities.	Community Facilities; Neighbourhood Centres; Reuse of Previously Developed Land	<ul style="list-style-type: none"> - Are sites located reasonably close to neighbourhood centres and/or community centres? Are the sites located within the Built-Up Area Boundary (BUAB)? - Is the site allocation re-using previously developed land? - Is the site likely to have 'secured by design' principles implemented within the development design?
10. To ensure everyone has the opportunity to participate in sport and to encourage active, healthy and independent lifestyles.	Health Facilities; Education Facilities; Leisure Facilities	<ul style="list-style-type: none"> - Is the site located in close proximity to existing leisure and recreation facilities? - Is the site located in close proximity to existing health facilities? - Is the site located in close proximity to existing local schools? - Will amenity areas be provided in association with the site? - Is the potential site capacity of the allocation likely to increase the numbers of users for local facilities (such as schools, GP surgeries) and would this have a detrimental impact upon such local facilities? - Would the development of a site mean the loss of formal or informal playing fields or other open space? Would the development have an impact on existing open space and would this be mitigated?

Assessment of Site Allocations/Designations

- 5.13 Each Local Plan housing allocation or protective designation for the Local Plan has been assessed against the objectives of the Sustainability Appraisal as part of their preparation on an individual basis. For each, both the immediate and future impacts that are predicted for each of the key sustainability objectives (be it environmental, social or economic) was identified and ascribed either a positive, negative, neutral or uncertain impact.
- 5.14 As stated, each site was assessed against the separate Sustainability Objectives against the criteria below. The impacts are colour coded in order to compare and contrast the site allocation/designations presented.

	Significant Positive Impact (++)
	Positive Impact (+)
	Possible Positive or Slight Positive Impact (+?)
	No Impact (0)
	Neutral Impact (/)
	Uncertain Impact (?)
	Possible Negative or Slight Negative Impact (-?)
	Negative Impact (-)
	Significant Negative Impact (--)

- 5.15 A more detailed commentary is provided at Appendix G to assist in explaining the reasons for ascribing a positive, negative, neutral or uncertain impact in each case and gives an overall conclusion for the sites sustainability. A consistent approach, and the same criteria, was used in the SA assessment of all the sites. In addition, the detailed commentary clarifies if there are any 'show-stoppers', which would fundamentally stop the potential development from coming forward, in financial or planning terms.

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.

Authority's 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 usually runs from the 1st April to the 31st March each year – although updated information is provided sooner if it becomes available.

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 Boundary (BUAB)

A 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. 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 publication of proposals for changes to the planning system, including those resulting in the Localism Act 2011 and the National Planning Policy Framework (2012).

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 Enterprise Partnership (LEP)

A local enterprise partnership (LEP) is a voluntary partnership between local authorities and businesses formed in 2011 by the Department for Business, Innovation and Skills to help determine local economic priorities and lead economic growth and job creation within its local area. They carry out some of the functions previously carried out by the regional development agencies which were abolished in March 2012. Crawley is located within the Coast to Capital LEP, which extends from Croydon to Brighton.

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 2015.

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.

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 the Planning Practice Guidance (an online national planning guidance resource published originally in March 2014, and subject to ongoing updating by the Department of Communities and Local Government). A separate document Planning Policy for Traveller Sites was also published at the same time as the NPPF.

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.

SMART Growth

Smart growth is ensuring that growth serves the environment, the economy and the community equally. It attempts to concentrate development into already-existing communities

where possible, while addressing the relationship between environmental, social and economic sustainability. This should be the right type of activity or development in the right place at the right time.

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. This has now been revoked and no longer forms part of Crawley's Development Plan.

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

Summary of Sustainability Appraisal Scoping Report Consultation Responses 19 January – 1 March 2012

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	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'	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 of 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	This will be included in the Issues in the Sustainability Report and considered for policy inclusion during preparation of the draft Local Plan
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)	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.	These points will be referred to as appropriate during policy formation, SA, and proposals for mitigation of policies

Summary of Sustainability Appraisal Scoping Report Consultation Responses 19 January – 1 March 2012

Comment received	Officer Response
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.	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 Sustainability Strategy, and an Alternative Site Assessment which will be of relevance for the SA / SEA and HRA.	These documents will be added to the Plans Policies and Programmes 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

**Summary of Sustainability Appraisal Scoping Report Consultation Responses
19 January – 1 March 2012**

Comment received	Officer Response
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: SUMMARY OF DRAFT SUSTAINABILITY REPORT
CONSULTATION RESPONSES**

**Summary of Draft Sustainability Report Consultation Responses
22 October – 3 December 2012**

Comments Received	Officer Response
<p>It is noted that Sustainability Objective 4 seeks 'To ensure that everyone has the opportunity to live in a decent and affordable home'. This objective is strongly supported and entirely consistent with the NPPF. However in considering the housing strategy to supply just 245 units a year in Policy H1, it is not clear how the scoring is reflected (a single negative mark is given) in comparison with additional parking at Gatwick receives a double negative mark. This inconsistency needs to be addressed prior to submitting Crawley 2029 to the Secretary of State.</p>	<p>We believe that the aims of Sustainability Objective Four are strongly supported by government and the council agree that this objective should be strongly pursued, but the council also recognises both the environmental and administrative constraints of Crawley. It is recognised that Sustainability Objective Four is negatively impacted upon with regards to Policy H1 (Housing Provision), and moreover, the mitigation of this objective has yet to be assessed (this will be completed for the submission document). Subsequently, a revised SA will also include the proposed mitigation measures that may revise the impact of a number of Local Plan policies, including Policy H1.</p>
<p>Topic Area B – Heritage, Character, Design and Architecture</p> <p>Paragraph B8: The Crawley Extensive Urban Survey (EUS) is referenced as part of the Sussex EUS, which is noted and welcomed. However paragraph 170 of the NPPF refers to "landscape character assessments...integrated assessment of historic landscape character" and in this respect there is scope to refer to the Sussex Historic Landscape Characterisation (HLC) as a useful source of historic land use data and character outside the urban area. It is noted that the Sussex EUS is discussed in terms of "is being prepared" but it is now complete and therefore 'is being...' should be changed to 'has been'.</p>	<p>We will refer to the Sussex Historic Landscape Characterisation (HLC) study, completed in 2010, within the SA. For the final version of this document, the council will ensure that this study is summarised. In addition, it is noted that Sussex EUS has now been completed and we will ensure that Paragraph B8 is updated accordingly.</p>
<p>Topic Area F – Transport and Infrastructure</p> <p>Paragraph F14 - Table: It is suggested that the clarity of the indicator information given be reviewed including whether the indicator explains specifically what is measured e.g. under F3 it is not clear what the 81% (2008) figure for West Sussex actually means.</p> <p>Generally the data sources given refer to local information collected by WSCC rather than the NIs themselves. In some instances it may be worth reviewing whether there may be more up to date information available. For example, it is assumed that the rail use data comes from Office of Rail Regulation statistics available on the following website and the most recent data is from 2010/11: http://www.rail-reg.gov.uk/server/show/nav.1529</p> <p>It may be useful to take a look at West Sussex Local Transport Plan monitoring indicators which are the indicators that we are using in the absence of a National Indicator Set. These cover similar</p>	<p>It is agreed that several of the indicators for the Sustainability Appraisal (SA) should be updated. In the absence of a National Indicator Set, the Council recognises that West Sussex County Council is a valuable resource for statistics regarding a wide range of topics, and in particular, transport. In addition, both the rail statistics web link and West Sussex Local Transport Plan monitoring figures will be introduced into the final version of this SA report, and moreover, it is recognised that the 2011 Census will also be a useful source of information in the future.</p>

**Summary of Draft Sustainability Report Consultation Responses
22 October – 3 December 2012**

Comments Received	Officer Response
<p>themes to those highlighted in the Sustainability Report. The most up-to-date monitoring will be posted on our website and updated periodically: http://www.westsussex.gov.uk/your_council/plans_projects_reports_and/plans/west_sussex_transport_plan/west_sussex_transport_plan_mon/west_sussex_transport_plan_mon.aspx</p>	
<p>CSP has reviewed the draft Sustainability Appraisal (SA) Report supporting the draft Local Plan. It supports paragraphs 2.16 and 2.17 that “Further growth into neighbouring authorities cannot be ruled out at this stage if further growth is required” (para 2.17). It goes on to state that therefore the draft SA could be applied to areas beyond the boundary of Crawley during the life of the plan and that the extent of the Plan area will be kept under review and updated as appropriate in future consultations. CSP supports the identification of the need to assess growth opportunities outside the borough boundary, however it recommends that this assessment is undertaken now and potential sites outside the borough identified to contribute towards the delivery of housing.</p> <p>CSP recognises that three key sustainability issues affecting the borough are identified as housing stock not matching the need and aspirations of the borough over the next 20 years, limited affordable housing which does not match need and limited land supply in the borough. This clearly calls for policies, a housing target and housing delivery strategy, including the identification of suitable sites, which can address these issues within the lifetime of the plan.</p>	<p>The council acknowledges the implications of not meeting demographic housing needs over the Plan period and is actively working with adjoining local authorities across the Gatwick Diamond area to establish the extent to which housing needs can be met across the housing market area, rather than focusing on administrative boundaries, which do not reflect the fluid nature of the housing market. It is hoped that broad agreement on housing numbers across the Housing Market Area can be reached through the 'duty to co-operate' requirement in respect of strategic priorities and it is on this basis, that the Local Plan seeks to be positively prepared and compliant with the requirements of the NPPF (Para 178 and 182) and therefore found 'sound'. Both the amount and location of new housing outside of council's administrative boundary to meet Crawley's demographic housing needs remains unknown at this stage and it is this work which is required to enable agreement on housing numbers across the Gatwick Diamond area. Please also note that for the formal submission of the Local Plan, the council will also submit a Housing Implementation Strategy (HIS) compliant with the requirements of the NPPF (Para 47), describing how the council will maintain a five-year supply of housing land to meet our housing target.</p>

**APPENDIX D: 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 its potential effects. Whilst reducing the release of gases that are contributing to climate change is an important aspect of 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 an increased in flood risk if it is not managed appropriately.
- A2 Similarly, the issue of waste is also important, since 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 within 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

- National Planning Policy Framework (CLG, 2012)
- National Planning Practice Guidance (CLG, 2014)
- Gatwick Diamond Local Strategic Statement (2011)
- Sustainable Community Strategy for West Sussex 2008-2020 (WSCC, 2008)
- Crawley Borough Council's Eco-management Audit System (EMAS) Statement
- Strategy for Energy Efficiency and Renewable Energy (Nov 2004)
- Corporate Strategy 2010-2015 (2010)
- Environmental report on the revocation of the South East Plan (October 2011)

Climate Change

- Climate Change Act (2008)
- Planning and Energy Act (2008)
- National Planning Policy Framework (CLG, 2012)
- BREEAM and the Code for Sustainable Homes (CfSH)
- Building Regulations Part L
- Corporate Climate Change Strategy (CBC, 2008)
- Crawley Carbon and Waste Reduction Strategy (CBC, 2012)
- Decentralised Energy Study for Crawley (Hurley Palmer Flatt, 2011)

Water

- Consultation on the Transposition of Article 6 of the Groundwater Directive (DEFRA, 2008)
- National Planning Practice Guidance (CLG, 2014)
- EU Water Framework Directive (2000/60/EC)
- Crawley Borough Council Strategic Flood Risk Assessment (SFRA) (CBC, 2014)
- Gatwick Sub-Region Water Cycle Study (Outline Study) (Entec Ltd, 2011)
- Water Cycle Study Update and Review of Policy Implications (AMEC, 2013)
- 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

- The Environmental Noise Directive (2002/49/EC)
- Environmental Noise (England) Regulations (as amended)
- National Planning Policy Framework (CLG, March 2012)
- Planning Practice Guidance: Noise (CLG, 2014)
- Noise Action Plan: Agglomerations (DEFRA, 2014)
- Noise Policy Statement for England (DEFRA, 2010)
- Airports Commission Discussion Paper 5: Aviation and Noise (Airports Commission, 2013)
- Planning Noise Advice Document: Sussex (East and West Sussex Authorities, 2013)
- West Sussex Structure Plan 2001-2016 (Policies ERA5, NE19, NE20)
- Gatwick Airport Noise Action Plan 2010-2015 (June 2010)

Air Quality

- National Planning Policy Framework (CLG, March 2012)
- Planning Practice Guidance: Air Quality (CLG, 2014)
- 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)
- Crawley Borough Council Local Air Quality Progress Report (December 2013)
- Air Quality and Emissions Mitigation Guidance for Sussex (Sussex Air, 2013)

Waste and Minerals

- National Planning Policy Framework (CLG, March 2012)
- Planning for Sustainable Waste Management: A Companion Guide to Planning Policy Statement 10 (CLG, 2006)
- Waste Local Plan (West Sussex County Council, 2014)
- Draft Minerals and Waste Core Strategy – Background Papers (West Sussex County Council, 2009)
- Government Review of Waste Policy in England (Defra 2011)
- Crawley Waste Management Strategy 2006 – 2009 (2005)
- West Sussex Minerals Local Plan (2003)
- West Sussex Minerals Local Plan Background Papers (consultation) (2014)

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 the borough of Crawley during 2005 were 869 Kilo-tonnes CO₂. Domestic contribution was 214 Kilo-tonnes CO₂ and industry 382 Kilo-tonnes (DECC Carbon Emissions Calculations 2011). By 2011, the total carbon emissions had fallen to 737 Kilo-tonnes CO₂, with the 214 Kilo-tonnes CO₂ for domestic use falling to 180 Kilo-tonnes CO₂ and industry use falling to 325 Kilo-tonnes CO₂.

A5 Over 30% 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 still comparable with more rural districts within the County.

Table A1: Per capita CO₂ emissions for West Sussex by sector for 2011

Local Authority	Industry and commercial (tonnes)	Domestic (tonnes)	Road Transport (tonnes)	Total (tonnes)	Population '000s (mid-year estimate 2009)	Per capita emissions (tonnes)
Adur	80	114	99	293	61	4.8
Arun	180	306	210	687	150	4.6
Chichester	296	281	308	835	114	7.3
Crawley	325	180	235	737	107	6.9
Horsham	270	274	298	835	132	6.4
Mid Sussex	228	278	310	794	140	5.7
Worthing	156	199	110	464	105	4.4
West Sussex Total	1535	1631	1571	4646	809	5.7
South East Total	18155	17293	19347	54634	8,653	6.3

Source: Local and regional CO₂ emissions estimates for 2005-2011 (Author AEA for DECC, July 2013)

Figure A1: Crawley Carbon emissions by sector, 2011

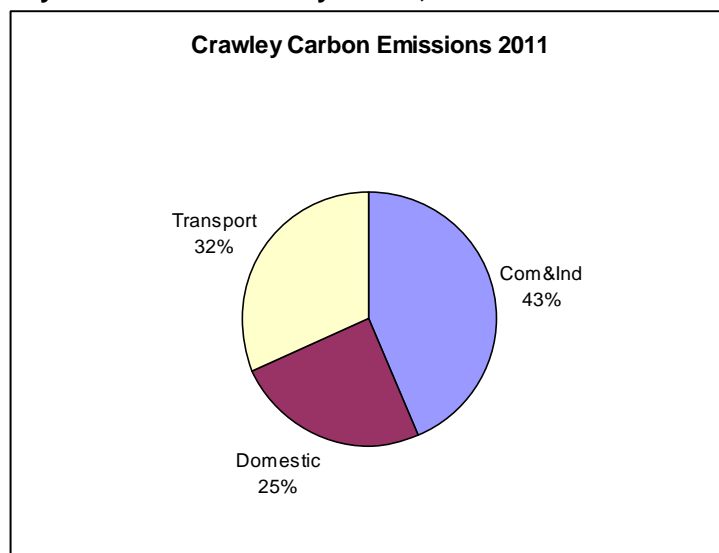


Table A2: CO2 emissions trends 2005-2011. Crawley and the South East

	Total CO2 emissions (tonnes per person)						
	2005	2006	2007	2008	2009	2010	2011
Crawley	8.7	8.8	8.5	8.4	7.5	7.6	6.9
West Sussex	7.2	7.1	6.9	6.7	6.1	6.3	5.7
South East	8.0	8.0	7.8	7.5	6.8	7.0	6.3

Source: Local and regional CO2 emissions estimates for 2005-2011 (Author AEA for DECC, July 2013)

Likely evolution without the continued implementation of the Local Plan

- A7 Although national legislation and standards for carbon emissions are likely to 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 Gatwick Diamond Local Strategic Statement seeks to support 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, decentralised energy 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 part of 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.		In 2012/13 the council achieved its 10:10 target with a 22.3% reduction in overall energy consumption.	Crawley Borough Council's Eco-management Audit System (EMAS) Statement
A2	Per capita CO ₂ emissions in the local authority area	2011: Domestic: 1.7 tonnes Total Emissions: 6.9 tonnes per capita	2011 South East: Domestic 2.0 tonnes Total Emissions SE – 6.3 tonnes per capita	The domestic figures do not compare favourably with the South East. Total emissions are higher than the regional average due to a high	Department for Energy and Climate Change statistics (July, 2013) Crawley Borough

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
				contribution from industrial and commercial activity in the borough. However, Crawley's CO2 emissions have decreased by 21% from 2005	Council's Eco-management Audit System (EMAS)
A3	Adapting to climate change	Level 1 (evidence submitted to DEFRA in May 09 that CBC currently at Level 1			Former 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 on the 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. West Sussex County Council adopted a Waste Local Plan in April 2014. This identifies 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	527 (kg/hhd) (2012/13) 526 (kg/hhd) (2011/12) 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	26.1% (2012/13) 27.1% (2011/12) 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	73.9% (2012/13) 72.9% (2011/12) 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 and employment development 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 number of areas within the borough are currently affected by flooding from the River Mole and its tributaries. The council has recently updated its SFRA to inform the submission Local Plan. This document has been drafted in liaison with the Environment Agency and West Sussex County Council and draws upon the Environment Agency Flood Map for Planning to identify the level of flood risk across the borough.

- A16 Crawley suffers from flooding from the upper reaches of the River Mole and its tributaries, 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. Works on the Upper Mole Scheme have been progressed to the stage where two elements, Worth Farm and Tilgate Lake, are functioning as designed. The completion of these two schemes will allow communities downstream to benefit from the reduction in flood risk offered. Construction of the scheme at Clays Lake is planned to commence in September 2014, with a completion date of September 2016. The Environment Agency is continuing to investigate the feasibility of the provision of a flood attenuation scheme within the Ifield area, and is working with local stakeholders and undertaking further works to understand the full benefits a scheme in this area could offer. In addition, the Environment Agency is continuing to explore opportunities to secure external funding for flood alleviation works for the Ifield area.
- A17 Planning guidance is provided through the Strategic Flood Risk Assessment (2014). This document provides advice for the areas of the borough that are more susceptible to flood risk, and outlines 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 (2013). 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 completed a Strategic Flood Risk Assessment (2012). 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 specific advice in considering 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 SFRA and 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 the greatest risk of flooding and ensure that new development is planned to minimise the risks of runoff and flooding, both to future occupiers and to properties downstream. The NPPF and Planning Practice Guidance advocate 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 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 planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds	EA raised objections to 2 planning applications in 2012/13 on the grounds of an unsatisfactory flood risk assessment and a proposal next to a watercourse flood defence. One of these applications was permitted following revisions. The other application was withdrawn prior to the decision being made.			Environment Agency Statistics

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 other Local Authority areas adjoining Crawley. There is a 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, therefore, been undertaken to investigate the availability of water supply (2013).

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 the new dwellings within Crawley over the Plan period to 2030. However, to assist the water companies in reducing the serious water stress exhibited within Crawley, the document recommends that the council includes water efficiency policies in its Local Plan, 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 Submission Local Plan at Crawley up to 2030. Southern Water is also required to produce Water Supply Management Plans identifying infrastructure capacity and water sources for the future. However, without the implementation of the Local Plan policies, which will assist in reducing water stress, it would become difficult for water companies to reliably supply water.

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
A8	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 sewage 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. The ability of the existing Crawley Sewage Treatment Works site to accommodate further expansion needs to be confirmed due to the availability of land.
- A26 On this basis, taking account of existing planning permissions and Local Plan housing allocations, the allocated new neighbourhood West of Bewbush (Kilnwood Vale), Crawley Wastewater Treatment Works was considered to 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 for the Local Plan during the period 2015-2030, although it is highly likely that Thames Water will need to upgrade the existing capacity again to meet the demand going forward. In addition, it is 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, 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 Local Plan period does not exceed Thames Water's identified capacity of 6,150 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, the Local Plan can manage the delivery of housing planned for, and if necessary phase development, to ensure that sufficient sewerage infrastructure is in place.

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 Nitrogen Dioxide (NO₂) and Particulate Matter (PM₁₀), and eleven permanent diffusion tube sites for NO₂ distributed throughout 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. The 2012 monitoring data for NO₂ identified exceedences of the national air quality objective for annual mean NO₂ at one location with relevant exposure, Tinsley Close, a residential receptor along the A2011. The monitoring data also indicated that there continues to be an upward trend in NO₂ concentrations at this site. The 2012 monitoring results for NO₂ confirmed that there were no exceedences of the AQ Objective at any other monitoring location in Crawley with relevant public exposure.
- 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 only one Air Quality Management Area (AQMA) identified in 2013 along the A2011, Crawley Avenue, and surrounding areas. 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 All roadside monitoring sites in Crawley showed a reduction in NO₂ concentrations in 2012 compared to the previous year, possibly due to a decrease in traffic flows during the monitoring period. However, the long term trend continues to be upwards (with the exception of one site at Pegler Way) and it will take a number of years of consistent reductions in NO₂ concentrations before a change in the trend will be detected. In contrast, the majority of background sites (with the exception of Furnace Farm Road) in Crawley showed an increase in NO₂ concentrations in 2012 compared to the previous year. The long term trend at background sites in Crawley continues to be upwards.

A35 NO₂ concentrations at monitoring sites around Gatwick increased or remained the same in 2012. The possibility of airport expansion at Gatwick in the future has identified a need for additional NO₂ monitoring at residential locations closest to the southern border of the safeguarded airport boundary. The new monitoring sites will be at: Langley Walk (Ifield), Cherry Lane (Langley Green), Radford Road (Tinsley Green) and Steers Lane (Tinsley Green).

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 influences the sustainability of new buildings; has some influence over car ownership in new developments; and the promotion of sustainable travel options, although individuals and businesses are responsible for the environmentally based decisions they make on a day to day basis. Policy ENV12 of the Local Plan will also require that development proposals to positively address air quality issues. 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 the council's control.

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
A9	Level of air quality – reduction in NO _x emissions and Particulate matter through local authority's estate and operations	NO _x : 2010 – 28.1 µg/m ³ 2009 - 28 µg/m ³ 2008 – 28.3 µg/m ³ PM10: 2011 – 23.0 µg/m ³ PM10: 2010 – 21.9 µg/m ³ 2009 – 22.4 µg/m ³ 2008 – 23.5 µg/m ³		PM10 trends show a reduction in PM10 since 2007 and an overall downward trend since 2004. Annual mean NO ₂ trends over the last 3 years show a rising trend in borough-wide average readings. 2010 showed a significant rise in NO ₂ concentrations in specific locations in the borough, exceeding 40 µg/m ³ . The Council is undertaking additional monitoring and analysis and will declare an AQMA if and when appropriate.	NI 194 2012 Air Quality progress report. Crawley Borough Council September 2012

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 Through Noise Action Plans, 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. Crawley is identified as one of 65 urban areas in England that are affected by noise and the Plan includes measures to mitigate excessively noisy areas. Crawley borough might be expected to take responsibility for implementing some of these measures.

A39 Gatwick Airport is a significant concern for noise pollution in Crawley. 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. However, planning permission for the development of a new neighbourhood at the North East Sector was granted by the Secretary of State following appeals in which aircraft noise was a key issue for consideration, in February 2011. The planning permission includes 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 would be less able locate noise sensitive development (such as residential uses) away from noise sources.

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, the approval of the North East Sector neighbourhood by the Secretary of State will place a significant number of new dwellings in locations that the council and national planning policy would normally consider unsuitable for residential development and schools if a second runway is located at Gatwick. The acoustic conditions relating to the permission will, however, help mitigate the impact of aircraft noise. The production of the Local Plan will ensure that the relationship between noise sensitive use and noise generating use is managed to ensure development does not result in an unacceptable noise impact, 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
A10	Number and type of new noise sensitive use built in areas currently and potentially affected by unacceptable noise.	The Secretary of State’s decision at the North East Sector permits noise sensitive development up to the 66 dB (A)Leq noise contour.	If a second runway is located at Gatwick, a number of existing properties will fall inside the projected 60 dB (A)Leq noise contour.	CBC Indicator

Sustainability Appraisal Objectives

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Objective One - To mitigate climate change, by taking actions to reduce the concentration of greenhouse gasses in the atmosphere.

Objective Two - To adapt to the effects of climate change, by reducing the negative consequences of changes in the climate on people and the environment, or by achieving a positive outcome from the effects of climate change.

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. In addition, parts of the new town (such as the Southgate Neighbourhood Parade) have been recognised as a Conservation Area. 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 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)
- Planning Practice Guidance (CLG, 2014)
- 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)
- Sussex Historic Landscape Characterisation (HLC) study (2010)
- Historic Parks and Gardens Review (Sussex Gardens Trust, 2013)
- Building for Life – Evaluating Housing Proposal Step by Step (2008)
- Secure by Design
- English Heritage, West and East Sussex EUS
- Housing Space Standards (GLA, 2006)

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 1950s, 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 eleven 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 Village, Worth, Forestfields & Shrublands (in Furnace Green) Dyers Almshouses (Northgate), Sunnymead Flats and St Peter's (both in West Green), Brighton Road, Malthouse Road and the Southgate Neighbourhood Centre (in Southgate) and Hazelwick Road (Three Bridges).
- B7 There are six designated Areas of Special Local Character (ASLC) in Crawley, which are locally important areas of special environmental quality. Four of these are located in Pound Hill.
- 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 (now known as an ASLC) 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 Local Character. The Crawley Extensive Urban Survey (EUS, 2010), 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 has delivered 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 has been 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 and non-designated assets, 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 and character of the local area can be enhanced. Furthermore, subject to the other policy considerations, the culturally important areas of the town can continue to be 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

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
B2	Percentage of conservation areas with up-to-date Appraisals (i.e. last 5 years).	One Conservation Area Statement. Currently reviewing/or undertaking the other Conservation Area statements	N/A	These Appraisals are being reviewed with the Conservation Area Advisory Committees.	Local Performance Indicator

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 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)
- Planning Practice Guidance (CLG, 2014)
- Laying the Foundations- A Housing Strategy for England (CLG, 2011)
- Gatwick Diamond Local Strategic Statement (Local Authorities, 2012)
- Crawley Borough Council; Refreshed Housing Strategy 2012-14 (CBC, 2012)
- Housing Act (2004)
- Planning Policy for Traveller Sites (CLG, 2012)
- Gatwick Diamond Local Strategic Statement (2012)
- Northern West Sussex Strategic Housing Market Assessment and updates (GVA, 2009, 2012 and 2014)
- Locally Generated Housing Needs Assessment (NLP, 2011)
- Housing Needs Update (CBC, 2014)
- The Strategic Housing Land Availability Assessment (CBC, 2014) and joint Appendix K (NWS Authorities, 2014)
- Urban Capacity Study (CBC, 2013)
- At Crawley Study (GL Hearn, 2009)
- New Market Town Study (CBC, 2010)
- Gypsy and Traveller Accommodation Needs Assessment (GTAA) (CBC, 2014)
- Housing Trajectory (CBC, 2014)

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 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. From 2005 – 2014, the downturn in the economic climate has gradually slowed the progress of sites creating a potential delivery issue but in recent months developer interest is increasing. The North East Sector was granted planning permission by the Secretary of State in February 2011; with detailed consent for the first phase granted in spring 2014. Onsite works have now commenced. A key priority for the council is to bring forward sites for housing development as a landowner or facilitator and assist those who wish to access a home that 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 weaker delivery of housing units 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, or for lower density schemes thereby not maximising the capacity of limited land resource.

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 determinants of supply and demand – access to developer finance and purchaser finance – are beyond the control of the Local Plan. However, the Local Plan Viability Study (CBC, 2013) has considered all planning policy viability implications for new housing development within the town.

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
C1	Plan period and housing delivery targets	<p>Average 276 p.a. over 2001-2013; And 370 p.a. over 2006-2013 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> <p>CBC Core Strategy – 2001-2016 = 4040 or 269 per annum</p>	Revoked South East Plan 28,900/annum for region over period 2006-2026		Former CLG Core Output Indicator H1
C2	Trajectory comprising: a) Net additional dwellings – in previous years b) Net additional dwellings – for 2013/14 c) Net additional dwellings – in future years Managed delivery target	<p>a) 2042 delivered over 2007-12</p> <p>b) 122 (net) in 2013/14</p> <p>c) 2723 projected over 2015-20</p>		There has been a reduction in the provision of new dwellings from the 679 net dwellings provided in 2007/08 to 122 net dwellings in 2013/14 reflecting a significant slow down in the housing market as a result of the recent economic recession	Former CLG Core Output Indicator H2 (a), (b), (c), and (d)
C3	Net additional pitches (Gypsy and Traveller)	Nil	Authorised Sites with Planning Permission England: January 11 –	The Gypsy, Traveller and Travelling Showpeople Accommodation	Former CLG Core Output Indicator

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
			Socially Rented - 6942 Private - 8332 South East : January 11 – Socially Rented - 1386 Private - 1893	Needs Assessment (CBC, 2014) identified a potential future need for up to ten pitches within Crawley.	H4 The bi-annual Count of Gypsy and Traveller Caravans
C4	Gross affordable housing completions	2012/13 - 32 (38% of supply) 2011/12 - 38 (19% of supply) 2010/11 - 134 (35% of supply) 2009/10 - 282 total (68% of supply) 2008/09: - 148 total (40% of supply) 2007/08: - 232 total (33.7% of supply)	England: 42,830 (2012/13) 58,100 (2011/12) 60,480 (2010/11) 57,980 (2009/10) 55,500 (2008/09) 53,180 (2007/08)	Crawley relied increasingly on affordable housing supply until 2011/12 when the proportion of affordable homes dropped. 44% of dwellings completed in the last five years were affordable – slightly higher than the Council's policy target. The number of affordable dwellings provided in England has also decreased significantly since 2010/11.	Former CLG Core Output Indicator H5 CBC Housing Strategy CLG Housing and Planning Statistics

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

C6 The 2011 Census indicates that the population of Crawley has risen significantly over the past three decades, increasing by 30% from 82,000 in 1981 to 106,597 in 2011. 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 local 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 2011. This increase is greater than the growth in population over a similar period. Average household sizes have declined from 2.74 in 1981 to 2.48 in 2011. 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. The latest household estimates (April 2013) project a figure of 636 per annum for the period 2011 to 2030 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. Policy H3 of the Local Plan (Future Housing Mix) endeavours provide the appropriate future housing mix for the future generations of residents within Crawley.

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, Strategic Housing Market Assessment 2012

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 submission Local Plan provides an opportunity to update the composition of need, particularly with regard to the role of intermediate tenures, which might be lost.

What the Local Plan can and cannot do

C14 Whilst the council cannot make developers develop sites, it can introduce policies that require the correct tenure, types and mix of housing, in the correct locations, subject to viability.

Indicator No.	Indicator	Crawley Data	SE/Engl and Data	Trend	Data Sources
C7	Estimated number of households in housing need (per annum)	82 – 382 affordable dwellings per annum	n/a		CBC Strategic Housing Market Assessment 2012
C8	Number of people on the housing need register by size of accommodation required	2012/13 1 bed = 689 2,3 and 4 bed = 1,323 1 and 2 bed Sheltered/retirement = 402 Total = 2,414 2011/12 1 bed = 1,123 2,3 and 4 bed = 1,641 1 and 2 bed Sheltered/retirement = 349 Total = 3,113 2010/11 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	n/a	The number on the housing needs register has increased over the four years up until 2012/13, where it decreased owing to changes to in the allocations scheme.	CBC Strategic Housing Market Assessment 2012 CBC Housing Strategy AMR

Indicator No.	Indicator	Crawley Data	SE/Engl and Data	Trend	Data Sources
		one & two bed sheltered = 302 Total = 2851			

Issue: Land supply in the borough is limited

C15 As Crawley’s administrative boundary is tightly drawn around the Built-Up Area Boundary (BUAB), 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. The building of family and aspirational homes, whilst meeting the numerical requirements of the borough, will be dependent upon ensuring the efficient use of land. With the commencement of Forge Wood neighbourhood, a significant amount of housing will be able to be provided, but work on housing needs indicates that much 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 development of Forge Wood (North East Sector) for 1900 dwellings. Whilst limited windfall sites may 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 land ownership issues. Furthermore, there is growing pressure / reliance on delivery of housing to address Crawley’s unmet objectively assessed housing needs within the wider Housing Market Area, outside of authority boundary because of the constrained land supply in Crawley. The Local Plan can attempt to maximise the availability of land within Crawley, of the correct type, and in suitable locations to meet some of its identified housing 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 April 2015 to 31 March 2020) = 2,723	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 has weakened the delivery of sites in the short and medium term.	Former NI 159
C10	New and converted dwellings – on previously developed land (PDL)	2012/13 74.1% of completions 2011/12: 84.7% of completions 2010/11: 82.4% of		A significantly greater portion of new dwellings were developed on previously developed land in Crawley in the last year than in 2007. 2012/13 figures were comparative with previous years figures	Former CLG Core Output Indicator H3 Annual Monitoring Report

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
		<p>completions</p> <p>2009/10 86.9% of completions</p> <p>2008/09: 86.7% of completions</p> <p>2007/08: 66.5% of completions</p>		and the proportion of PDL has remained stable over the last 5 years.	
C11	Average density of new residential development	<p>2012/13 All sites – 48.1 dwellings/ha 10+ units sites – 45.8 dwellings/ha Up to 9 unit sites – 52.5 dwellings/ha</p> <p>2011/12 All sites – 70.1 dwellings/ha 10+ unit sites – 74.9 dwellings/ha Up to 9 unit sites – 44.4 dwellings/ha</p> <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>			West Sussex Monitoring Data.

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 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 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

- National Planning Policy Framework (CLG, 2012)
- Planning Practice Guidance (CLG, 2014)
- Gatwick Diamond Futures Plan 2008 – 16
- GHK Diamond Report (October 2008)
- Gatwick Diamond Local Strategic Statement (2012)
- Coast to Capital Local Enterprise Partnership Strategic Economic Plan (2014)
- Crawley's Economic Plan (CBC, 2011 – 16)
- Local Development Framework Diamond Report (GVA Grimley)
- Employment Land Review Part 1 and 2 (GL Hearn, 2009 and 2010)
- Northern West Sussex Economic Growth Assessment (NLP, 2014)
- Northern West Sussex Economic Growth Assessment Crawley Emerging Findings Paper (NLP, 2013)
- Manor Royal Design Guide SPD (CBC, 2013)
- Manor Royal Public Realm Strategy (CBC, 2013)
- Town Centre Wide SPD (CBC, 2009)

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. In the short term the Economic Growth Assessment (EGA) 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 office space, including A-grade premises, although several of these have been subject to prior approval applications and/or consents for changes of use to residential. 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 An updated Local Plan will be important in terms of identifying at a strategic level the amount of business growth over the Plan period, and the type and amount of business-led employment land that needs to be planned for. The lack of an updated Local Plan would restrict the council's ability to plan positively for sustainable strategic economic growth in a manner that responds to the NPPF and Duty to Cooperate. Although

existing policies would continue to enable some changes to be made through the planning application process, without an up-to-date Local Plan in place it will not be possible to plan strategically to promote the economic role and function of Crawley. Although the council has a clear economic vision for Crawley an updated Local Plan will enable the council to work with businesses, adjoining authorities and other stakeholders to plan positively for economic growth.

What the Local Plan can and cannot do

- D5 The EGA shows how the Local Plan could potentially help maintain and enhance Crawley’s established economic function through setting out a clear strategy to promote economic growth. This can be achieved by protecting the established role of Manor Royal as the leading destination for business-led employment, promoting other Main Employment Areas for flexible economic uses, and positively promoting Crawley as a competitive town centre. However, the Local Plan is unable to influence development that is allowed under Prior Approval, for example the potential loss of office space to residential use. The plan can highlight through design codes and policy the types of developments that are appropriate in particular locations (see the Manor Royal Supplementary Planning Document (CBC, 2013)), 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.

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
D1	Total amount of employment floor-space completed – by type	<p>2012/13 B1 Mixed Uses – 563m2 gross (563m2 net) B2 – 431m2 (76m2 net) B8 - 7,176m2 gross (6,783m2 net)</p> <p>2011/12 B1a – 4,717m2 gross (2,923m2 net) B1 Mixed Uses - 3,445m2 gross (563m2 net) B2 – 1,170m2 gross (650m2 net)</p> <p>2010/11 B2 – 4,966m2 gross (357m2 net) B8 – 2,767m2 gross (2,767m2 net)</p> <p>2009/10 B1c– 1,947m2</p>	Crawley has over 49% of B-type employment floor-space in the Gatwick Diamond sub region.	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 as suggested in the 2011/12 figures.	Former CLG Core Output Indicators: Business Development and Town Centres (AMR)

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
		net B2 – 368m2 gross B8 – 14,335m2 gross 2008/09 B1a – 22,819m2 net B2 – 556m2 gross B8 – 2174m2 gross			
D2	Employment land available – by type	2012/13 B1a – 12.82 Ha B1 Mixed – 19.87 Ha B2 – 0.30 Ha B8 – 1.17 Ha 2011/12 B1a – 8.90 Ha B1 Mixed – 8.53 Ha B2 – 0.04 Ha 2010/11 B1a – 10.55 Ha B2 – 8.46 Ha B8 – 0.04 Ha 2009/10 B1a – 13.36 Ha B1mixed – 8.56 Ha B2 – 5.97 Ha B8 – 0.37 Ha		The total amount of employment floor-space allocated and with permission for development in recent years has decreased as fewer planning permissions for development have come forward. The 2012/13 figures however show a sudden upsurge in land available for employment uses.	Former CLG Core Output Indicators: Business Development and Town Centres (AMR)
D3	Total amount of floor-space completed for town centre uses	2012/13 Total of 907m2 gross in the Local Authority 2011/12 Total of 1,397m2 gross in the Local Authority 2010/11 Total of 1601m2 gross in the Local Authority 2009/10 Town Centre – total 622m2 gross	Crawley has 53% of total office floor-space in the sub-region, but weak demand has left A-grade space vacant		Former CLG Core Output Indicators: Business Development and Town Centres (AMR)

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
		Local Authority - Total 125m2 gross			

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 businesses and findings of the EGA, 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, it also creates environmental concerns arising from large numbers of people travelling to Crawley on a daily basis and their methods of transportation. In addition, an identified lack of local skills and the limited availability of land suitable to accommodate economic growth 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 existing problem in managing the dual demand for land to accommodate identified housing and economic growth needs.

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 and type of housing stock (including delivery of a mix of affordable and market housing), higher-paid employees will continue to live outside the borough and commute into 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, 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	21.5% (2011 Census)	SE = 29.9% England = 27.4% (2011 Census)	Crawley still has the lowest percentage of the population with at least a Level 4 qualification within West Sussex, which is below both the South East and national figure	Census 2011

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 market needs. With strong policies the council could manage the type and phasing of new floorspace to meet the long term aspirations of Crawley, the Gatwick Diamond Local Strategic Statement, and the Coast to Capital Local Enterprise Partnership. This would reflect the NPPF requirement to take account of local evidence in planning positively to promote sustainable economic growth.

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%)</p> <p>(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 now revoked 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 remained committed to delivering a step change in the town centre offer, including a significant town centre redevelopment scheme at Town Centre North. However, because of the shift in economic conditions and changes in the development market, it was considered appropriate to reassess the likely capacity and viability for a scheme to be delivered within the Local Plan period before re-embarking on any discussions with potential new development partners. The need for additional retail floorspace within the sub-region was re-evaluated and confirmed through the Local Plan. However, in response to the challenging economic climate, the evidence recognised that TCN would most likely come forward in the form of a scaled-back, retail-led development in the region of 30,000sq.m.
- D14 During preparation of the submission Local Plan, it became evident that changes in the retail market and evidence from detailed work with two major development partners indicated that deliverability of a single comprehensive retail-led development at the scale previously identified would be questionable. The retail industry has continued to suffer, with several retailers going out of business and growing online retail having a huge impact on shop sales. Major retailers have taken an increasingly conservative stance to major development focusing on the larger and more established towns and cities.
- D15 Against this backdrop, Stanhope, the council's second development partner, worked with the council to try to develop a scheme and an overall approach to the town centre which would be attractive to the major retailer or retailers needed to anchor any development. This included negotiations with alternative retail anchors and exploration of opportunities to deliver a leisure-led scheme supported by retail. However, despite having worked positively to assess all the available options, it has not, at this time, been possible to overcome obstacles to delivering Town Centre North. On this basis, it was agreed that Town Centre North could not be progressed in the current climate and agreed to end their working arrangement in June 2014.
- D16 Therefore, the Local Plan applies a pragmatic approach to facilitate regeneration in Crawley town centre and the single allocation for a comprehensive redevelopment scheme at Town Centre North has been removed from the Plan. It is recognised that Land North of the Boulevard and the County Buildings sites continue to represent areas with significant potential for redevelopment and/or alternative use in the town centre. Therefore, both locations are allocated under Local Plan Policy EC6 as Key Opportunity Sites within the Town Centre Boundary. In turn, the focus for retail in the town centre will be in Queens Square, currently experiencing a high level of vacancy/temporary lets, and at County Mall, which has been recently refurbished, attracting new occupiers and others relocating from Queens Square.

Likely evolution without the continued implementation of the Local Plan

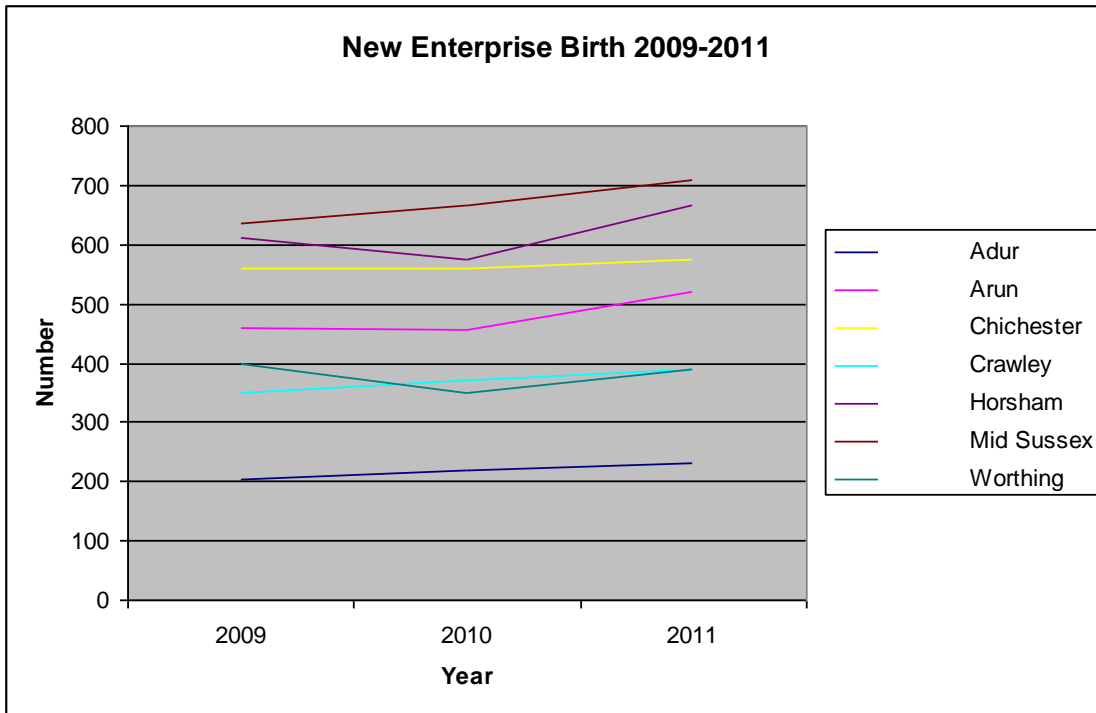
- D17 It is clear that, at the present time, delivery of a step-change retail-led regeneration at Town Centre North is not deliverable. In this regard, the existing approach set out within the Core Strategy (2008) and the Town Centre North SPD does not reflect an up-to-date position and is not deliverable. It is, therefore, considered that the revised approach set out in the updated Local Plan will be critical in providing the additional

flexibility that is needed to reflect the NPPF, and respond positively to market signals at a challenging time for retailers, to ensure that Crawley town centre is able to remain competitive. Up-dated policies are therefore important to help encourage investment that promotes the vitality and viability of the town centre, whilst resisting inappropriate out-of-centre development.

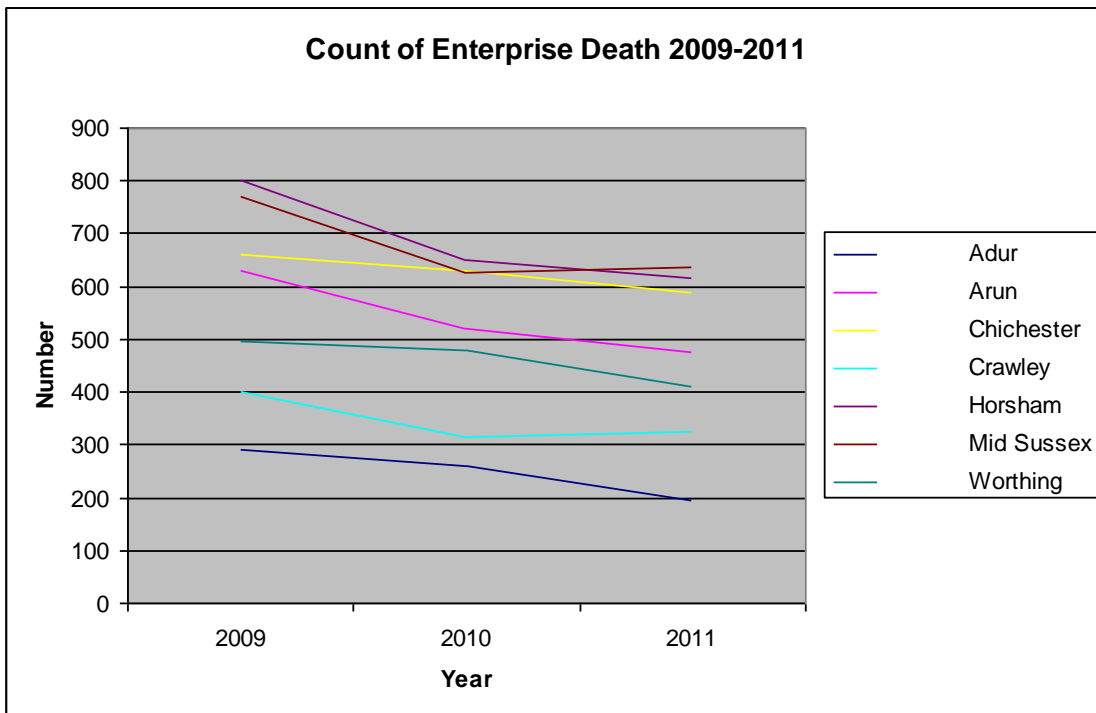
What the Local Plan can and cannot do

D18 The Local Plan can help to deliver a vibrant and competitive town centre that provides a wide range of main town centre uses including retail, leisure, recreation, and community services, as well as residential use. This can be delivered through allocating sites for a variety of developments and promoting flexible policies that will promote a retail heart, encourage a range of other town centre uses, attract footfall and promote an attractive and pleasant town centre environment. It can also 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), the nationwide growth in online retailing, 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.	Former NI 171



Source: ONS 2011, Count of Births of New Enterprises for 2009-2011



Source: ONS 2011, Count of Deaths of Enterprises for 2009-2011

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 is of significant importance to the setting of the town and the biodiversity within and surrounding it. In addition, green infrastructure routes are common within the town and these, 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 improvement, the natural environment of Crawley is particularly under 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

- National Planning Policy Framework (CLG, 2012)
- Planning Practice Guidance (CLG, 2014)
- EU Habitats Directive 99/43/EEC (1992)
- The Natural Choice: securing the value of nature (DEFRA, June 2011)
- Natural Environment and Rural Communities Act 2006
- Waste Framework Directive (2012)
- State of the Environment 2007, South East England (Environment Agency)

Landscape/Countryside

- National Planning Policy Framework (CLG, 2012)
- Crawley Landscape Character Assessment (CBC 2012)
- High Weald AONB Management Plan (2014-2019)
- Built-Up Area Boundary Review (CBC 2012)
- PPG 17 Assessment - Open Space Sport and Recreation Study (PMP July 2008)
- Crawley Open Space Study (2013) JPC Strategic Planning and Leisure Limited
- Crawley Playing Pitch Assessment (2013) JPC Strategic Planning and Leisure Limited
- 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) (WSSCC, 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)
- Biodiversity 2020: A Strategy for England's wildlife and ecosystem services
- Biodiversity Action Plans – Woodland, Urban (Sussex Wildlife Trust)
- Sites of Nature Conservation Importance (SNCI) & Wildlife Sites Review (Dolphin Ecological Surveys, September 2010)

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 boundary, and therefore the council published a Screening Report alongside the 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 expected that this impact will be significant and no Appropriate Assessment would be required.
- E4 The borough has designated 12 Sites of Nature Conservation Importance (SNCIs) covering 330.1 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 that time, there were 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 is currently 1.76 ha of park and garden space per 1000 population in Crawley, which is comparatively high for an English town. Crawley's Open Space, Sport and Recreation Study 2013 updated the Council's evidence base in relation to open space and playing pitches. These spaces have a multi-functional role: being fundamentally important to the structure of the town; providing recreation space; playing 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 from infill development.
- 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 for residents and visitors. 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 improved in some instances (such as to provide a better connected green infrastructure network, and adding facilities for older children), although the loss of green space would have to be considered against the other SA Objectives of the Plan. 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 limited degree of protection to these areas and, in addition, that in trying to meet housing requirements, the Local Plan has considered developing some of these sites. National guidance requires local policies to be set in an up-to-date Local Plan, therefore, without the continuation of the Local Plan it is likely that the council will have less control over which sites are protected as the existing policies become more outdated, leading to loss of areas of open space/biodiversity that are more valued than other more suitable sites for development.

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 maintain a sufficient amount of space to meet the needs of residents and to enhance them in some circumstances. Currently policy exists to achieve this, but their effectiveness is an issue. The potential for a new designation proposed in the NPPF: a Local Green Space has been explored with residents and has resulted in the proposed Local Green Space at Ifield Brook Meadows and Rusper Road Playing Fields.
- 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 2012/13			CBC Sussex Biodiversity Record Centre
E2	Amount of trees with Tree Preservation	13 TPO applications were granted during			CBC

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
	Orders lost per annum	the monitoring year 2012/13.			
E3	Amount and type of open space, sport and recreational spaces lost/gained per annum	Not currently monitored however, future data will serve as baseline			CBC

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 precedence 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, green infrastructure 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.

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 only one planning application during 2012/13 have infringed on designated and habitat areas.	Former 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)	73% in 2012/13	All England top quartile 44%	CBC has 12 SNCI sites and of these 9 have been actively managed over the past 5 years. The 3 other sites are privately owned and as such CBC have no control over the management of these sites.	Former 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 is 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 has been undertaken 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 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

- 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 (CLG, 2013)
- Planning Obligations and S106 Agreements Supplementary Planning Document (CBC, 2008)
- Crawley Infrastructure Plan (CBC, 2013)
- Gatwick Sub-Region Water Cycle Study (Entec UK Ltd, 2011) and 2013 update

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)
- Rail Utilisation Strategies – London and the South East (Network Rail, 2011)
- Transport Modelling Part 1 (Amey Consulting, 2012)
- Transport modelling Part 2 (Amey Consulting, 2014)

Gatwick

- Gatwick Master Plan (GAL, 2012)
- Aviation Policy Framework (DfT, March 2013)
- 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)
- Airports Commission Interim Report (December 2013)
- A Second Runway for Gatwick, Our April 2014 Runway Options Consultation (Gatwick Airport Limited, April 2014)

- Airports Commission Consultation Document Gatwick Airport Second Runway, Heathrow Airport Extended Runway, Heathrow Airport North West Runway (Airports Commission, November 2014)
- Airports Commission Gatwick Airport Second Runway: Business Case and Sustainability Assessment (Airports Commission, November 2014)

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, Haslett Avenue East, 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 Highways Authority has previously undertaken a study that has shown that in order to accommodate future growth including traffic from all planned development as set out in the former 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. In addition, the Crawley Local Plan Transport Strategy (Stage 1 and 2) confirm that the development proposals within the Local Plan would not severely affect the transport network within Crawley.

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. 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 25th 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 26km 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 36 million passengers. It is estimated that within its current two terminal, one runway configuration it can cater for up to 45 mppa by 2030. 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 Local Plan to safeguard land for a second runway at Gatwick, although a review of national aviation policy is being undertaken in the near future.
- 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, up from the 2006 figure of 35.3%. CAA modal share information indicates that this 40% target was reached in 2010, although passenger throughput was 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 the surrounding sub-region.

Likely evolution without the continued implementation of the Local Plan

- F12 Without the Local Plan, the council would not 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 will 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 has formed 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	No data			Former 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			Former 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)		Former NI 176
F4	Local bus and light rail passenger journeys originated in the authority area	No data	West Sussex - 23642979 (2008/09)		Former 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%	(2008/09) WSCC 5-10 Years: Car- 35.6% Car Share – 6.3% Public transport – 2.3% Walking – 53.8% Cycling – 1.7%	Data for Crawley indicates a higher proportion of sustainable travel than in 2010. Fewer pupils are cycling to school, but proportions of	Former NI 198 West Sussex County Council – Jan

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
		Dedicated school bus – 2.5% Train – 0.1% Taxi – 0.6% Walk – 59.4%	Other – 0.3% 11-16 Years: Car- 16.8% Car Share – 3.5% Public transport – 27.7% Walking – 43.5% Cycling – 7.9% Other – 0.5%	walking, bus and car-share journeys are higher.	2011 School Census
F6	Number of passengers using Gatwick Airport per annum (and percentage arriving by public transport)	2012 (Q1 and Q2 only): 34.2m (43.7%) 2011 33.6m (42%) 2010: 31.3m (40.4%) 2009: 32.3m (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 have increased thereafter. SAAP target for 40% public transport access was met in 2010 and has continued upwards.	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 sufficient infrastructure should be in place to support the borough's continued growth within currently planned limits. 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 control 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 council.

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 106,000. 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 wellbeing 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 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)
- Reuniting Health with Planning – Healthier Homes, Healthier Communities (TCPA, 2012)
- Gatwick Diamond Local Strategic Statement (2012)
- National Community Safety Plan 2008-2011
- PPG 17 Assessment, Open Space Sport and Recreation Study (PMP 2008)
- Crawley Open Space Study (2013) JPC Strategic Planning and Leisure Limited
- Crawley Playing Pitch Assessment (2013) JPC Strategic Planning and Leisure Limited
- Infrastructure Delivery Plan (CBC, 2014)
- Noise Annex: Local Plan (CBC, 2014)

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

G3 The Census 2011 estimated the population of Crawley as 106,597 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 44) 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 2011 Census indicates that 20% of the resident population is under 15 years of age (compared to 17.7% for England), 61.6% is between 15 and 59 (compared to 59.5% in England and Wales) and 18.4% is aged 60 and over (compared to 22.8% 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, can 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 the Community Infrastructure Levy, and plan for their implementation during the Local 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.	Former NI 138 2008/09 Place Survey
G2	Percentage who think that older people in their local area get the help and support they need	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	Former NI 139 2008/09 Place Survey

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
	to continue to live at home for as long as they want to			receive than those renting their home from a private landlord or 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	Former 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 (Census, 2011) 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 5.2% of the population of the borough; and Pakistani who represent 4.3%. This is in comparison with 2.6% and 2.1% 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.	Former NI 1 2008/09 Place Survey
G5	Percentage of people who feel	53.5%	West Sussex	Further work is needed to improve the feeling of belonging	Former NI 2

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
	that they belong to their neighbourhood - Place Survey		County - 61.7% All England - 63.7%	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.	200809 Place Survey

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 centre and offers a wide range of professional qualifications and courses.

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 numeric 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, it is not included in an updated policy within the Local Plan as it is unlikely that this will be a physical presence with the university sector providing a "university without wall" concept. The provision of early years and educational facilities is the responsibility of County Council, and will be identified in our Infrastructure Plan where relevant.

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 the end of 2015, 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, but that does not necessarily translate into 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	Former NI 91
G7	Percentage of people aged 16 – 74 with no qualifications.	20.1%	SE – 19.1% England – 22.5%	Within the South East, Crawley has a higher proportion of people with no qualifications	2011 Census

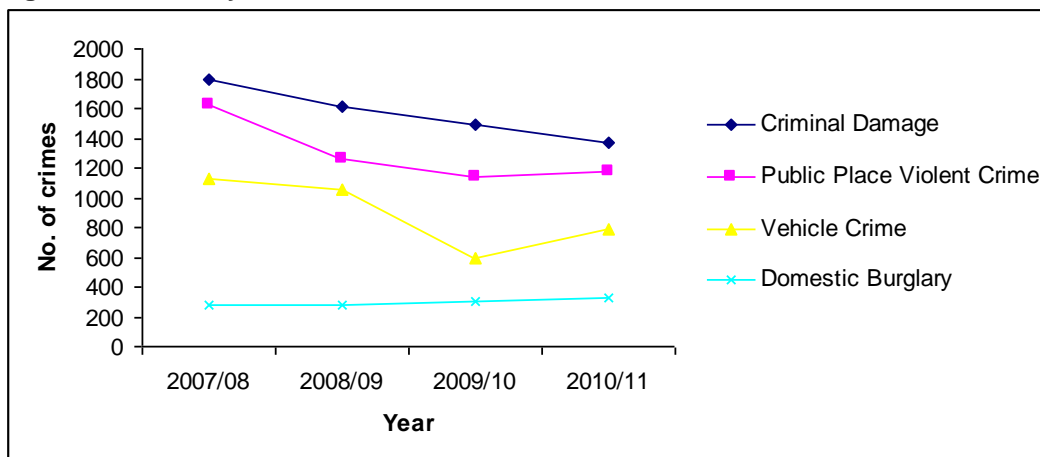
Issue: There is a need to reduce crime and the perception of crime

G16 Recorded crime in the borough decreased by nearly 18% from 14,677 to 12,083 between 2005 and 2008, and an additional 22.7% between 2008 and 2013 to 9,342. Of the recorded crimes in 2012/13, 14.8% (1,385) occurred at Gatwick.

Table G1: Crawley Crime incidence 2007-2013

Crawley and Gatwick Airport	2007/2008	2008/2009	2009/2010	2010/2011	2011/2012	2012/2013	Actual difference over 3 years	Three year % change
Total Crime	12,083	11,155	10,035	9,410	9,659	9,342	- 68	- 0.7%
Domestic Burglary	276	283	307	326	263	307	- 19	- 6.2%
Vehicle Crime	1,128	1,059	591	787	754	1,024	+ 237	+ 23.1%
Criminal Damage	1,790	1,608	1,492	1,372	1,218	1,047	- 325	- 31%
Public Place Violent Crime	1,619	1,264	1,142	1,174	1,129	1,136	- 38	- 3.4%
Business Crime	4,310	4,234	3,895	2,172	2,239	1,989	-1,471	- 74%

Figure G1: Crawley crime incidence 2008-2011

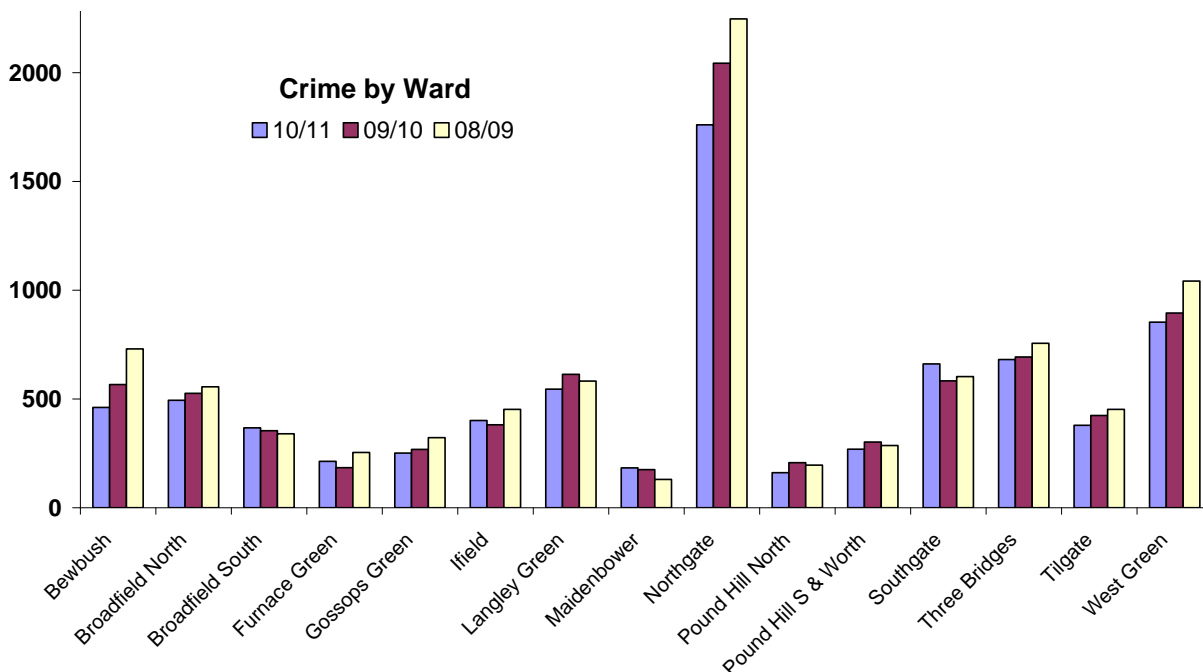


G17 Crime patterns and fear of crime vary across Crawley and have different impacts on quality of life and development. Much crime goes unreported, particularly that related to minor physical violence. Sexual assault and levels of domestic violence, although small in total, are much higher in the Crawley area compared to the rest of West Sussex. 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. However, national guidance requires local design policies to be set in an up-to-date Local Plan, therefore, without the continuation of the Local Plan it is likely that the council will have less control over design standards as the existing policies become more outdated, leading to a lack of consistency in relation to good design.

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	35%	N/A	The most recent survey results illustrate a increase in residents opinion up from 27% from the	CBC Resident's Survey 2008

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
	place.			previous survey in 2005/06	
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 violent crime rate (number per 1,000 population)	0.3 (2008/09)	West Sussex 0.3 All England Average 0.93	There has been an increase in the rate when comparing the first three quarters of 2008/09 to 2009/10 (0.19 increase to 0.55)	Former 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)	Former 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 All England Average 7.69	There has been a decrease in the rate when comparing the first three quarters of 2008/09 to 2009/10 (5.23 decrease to 5.02)	Former NI 20 Home Office – iQuanta No longer collected by Crawley Borough Council

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 Town's 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 is very high. There are, however, local quality issues and in some areas the location of facilities does not match the local needs, so an element of refinement is now required to ensure the assets are fit for the life of the plan. 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 might 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	83.5% in good health or better	England Average – 81.4 South East - 83.6 WSSC – 82.5%	Crawley has a higher self reported measure of people's overall health than England's average.	Census 2011
G16	All-age all cause mortality	2008-09	England: 2008/09	Crawley saw a rise in female	Former NI 120 (a-Females & b-

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
	rate	Females 451 Males 540	Females 480 Males 669	mortality from 382 in 2007/08 to 451 but a fall in the male mortality from 580 in 2007/08 to 540.	Males)
G17	Healthy life expectancy at age 65 (years)	2011 Females 21.8 Males 18.8	South East 2011 Females 21.6 Males 19.0 England and Wales 2011 Females 21.0 Males 18.4	Crawley's data for health expectancy at 65 is similar to the national average.	2011 Census Office of National Statistics
G18	Adult Participation in Sport	2010-12 – 20.2% 2009-11 – 17.3% 2008-10 – 17.9% 2007-09 – 17.0% 2005/06 – 19.6%	Regional Average 2011-12 – 24.1% 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 slight increase in participation from the result of the first survey carried out in 2005/06 which was 19.6%. Crawley has the average participation rate for West Sussex, but lower than the Regional and National averages.	Former NI 8 Active People Survey by Sport England
G19	Percentage of residents satisfied with the authorities sports/leisure facilities	85%		Increase from 07/08 result of 68%	Place Survey 2008

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 E: VISION AND STRATEGIC SPATIAL STRATEGY
ISSUES AND OPTIONS**

ISSUES AND OPTIONS TOPIC PAPER 1: VISION, OBJECTIVES AND DEVELOPMENT STRATEGY

The options set out in Topic Paper 1 both in 2009 and 2012 included 3 scenarios for consideration. The 2009 scenarios were updated in 2012 to reflect the current situation as below:

Scenario 1: A sub region with a South East regional focus

- Allocate sufficient land to accommodate housing needs and accept further residential development at Crawley beyond the Borough boundary to enable Crawley to meet and perform a wider sub regional function. Ensure sites are allocated to secure affordable housing provision and an appropriate mix of dwellings to meet Strategic Housing Market Assessment guidance.
- Allocate sufficient land and outline policies to maintain Crawley's sub regional economic position, support the town's existing main employment provision to cement Crawley's economic strength in the sub region and increase competition with other regions in the South East.
- Positively encourage development of a university/Higher Education provision at Crawley to address skills issues.
- Continue to facilitate the delivery of Town Centre North and the town centre renewal to ensure the town centre's vitality and viability, and sub regional and regional dominance and position.
- Continue to safeguard for a possible second runway at Gatwick.
- Ensure development is delivered to high sustainability standards.

Scenario 2: A sub regional focus

- Allocate land within the borough that does not undermine the neighbourhood and master planning principles of the town.
- If insufficient land can be allocated within the Borough boundary to meet the identified and agreed housing needs target, the council acknowledge that development at Crawley (beyond the Borough boundary) may be acceptable to contribute to the Borough's requirement, in partnership with the relevant adjoining neighbouring authority(s).
- Ensure sites are allocated to secure affordable housing provision and an appropriate mix of dwellings to meet Strategic Housing Market Assessment guidance.
- Allocate sufficient land and outline policies to maintain Crawley's sub regional economic position and work with neighbouring authorities to examine the potential for strategic employment to establish a sub regional spatial economic vision, which may equate to allocations in, at or near to Crawley, or application of SMART growth. A university or improved Higher Education provision may form part of this approach.
- Continue to safeguard for a possible second runway at Gatwick.
- Continue to facilitate the delivery of Town Centre North and town centre renewal to ensure the town centre's vitality and viability and sub regional dominance.

Scenario 3: Crawley Borough focus

This approach would largely be the same as Scenario 2. However, there would be the following variations:

- Allocate land within the borough that does not undermine the neighbourhood and master planning principles of the town.
- Ensure sites are allocated to secure affordable housing provision and an appropriate mix of dwellings to meet Strategic Housing Market Assessment guidance.
- Advocate and employ policies that protect the town's main employment areas and ensure growth in accordance with solely SMART growth, which would cement sub regional dominance, but do little in terms of achieving sub regional competition.

The indication of the potential direction was set out in the Topic Paper in 2012 as follows:

At this stage, a combination of the sub regional focus and the Crawley Borough focus scenarios is favoured. This approach is the most appropriate and sensible in light of several key uncertainties, which significantly influence the approach the council can adopt in planning to 2029. The uncertainties include the possibility of a second runway at Gatwick, the current economic climate and its implications for economic development and the role of the Gatwick Diamond, the nature of town centre development, and the residential market and the rate of development.

On this basis it is likely that by 2029:

- The town will have accommodated new dwellings to meet Crawley's housing needs, with a notable proportion of affordable housing and a dwelling mix that reflects the town's requirements.
- The New Town and neighbourhood principle will have remained at the heart of development within and at Crawley.
- The town's character and heritage would have been conserved and enhanced and new innovative design and master planning would have delivered the next generation of character.
- West of Bewbush and North East Sector may have been developed, or be under construction. A further neighbourhood may be planned for.
- Town Centre North would be complete and the town will be operating as a regional retail destination.
- Selected neighbourhood centres would have undergone a programme of regeneration and renewal and all would still be performing their everyday convenience role.
- Crawley will still be at the heart of the Gatwick Diamond economically.
- Manor Royal will have undergone council supported environmental improvement and would have maintained, perhaps enhanced, its sub regional economic function through smart growth.
- The town may have accommodated strategic employment development to increase the sub region's position/competition against other sub regions within the region.
- Employment development would have been of a form to address the Gatwick Diamond's economic weaknesses and deficiencies.
- Higher Education opportunities within the town would have been increased to provide skills opportunities.
- The council would have formulated and implemented a comprehensive transport strategy for the Borough, with a strong focus on sustainable transport.
- The government would have made a definite decision regarding the requirement for a second runway at Gatwick, whilst the council would have continued to support Gatwick as a single runway, two terminal airport.
- The town would be supported by improved access to sustainable transport, including rail station improvements, and further Fastway development, which is likely to have been predominately development funded.
- Development would have maximised opportunities for sustainable development, design, and construction, and will have strived for low carbon energy efficiency.

The following questions were asked as part of the consultation:

- V1. Do you think it is a place people value?
- V2. How can the Vision seek to make Crawley a place people aspire to and wish to stay?
- V3. What should the Vision for Crawley be?

- V4. What should the Vision for Crawley include/cover?
- V5. What are the priorities for Crawley's long term Vision?
- V6. What is Crawley's position in the Sub-Region?
- V7. Do you agree with the Key Issues outlined below?
- V8. Do you particularly agree with taking forward any of the scenarios? Or do you believe there is an alternative approach?

The feedback from the Issues and Options consultation led to the preparation of the Crawley 2030 Vision.

It is acknowledged that the Local Plan can only allocate land within its administrative boundary, and, therefore, when faced with the evidence indicating a very high level of need for both housing and employment land it would only be appropriate to seek to meet as much of this need as is possible to accommodate within the borough boundary whilst ensuring this forms positive sustainable development in light of the physical, environmental and infrastructure constraints.

No stone has been left unturned when considering the extent of Crawley's capacity. Each site has been subject to detailed sustainability assessment to determine whether it should be allocated for development or protected for a particular designation. Policies have been drafted to ensure that designations only preclude development where this is appropriate to do so.

In addition, ongoing discussions have taken place throughout the preparation of the Local Plan under the Duty to Cooperate to consider how far the wider Housing Market Area, within which Crawley is located, can accommodate the objectively assessed unmet needs arising from within the borough. This work has included discussions into the possible strategic sites and broad locations across the Housing Market Areas as a whole, as well as the locations immediately adjacent to Crawley to ensure the decisions truly offer the most sustainable long-term solutions. Sites outside of the borough have been subject to the relevant neighbouring authority's Sustainability Appraisal. Crawley Borough Council engaged informally as these were being prepared and formally responded through consultations where appropriate.

The options were assessed as below:

Spatial Strategy and Vision			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Scenario 2 and 3: a combination of the sub regional focus and Crawley borough focus. A combination of Scenarios 2 and 3 were chosen to create a realistic and deliverable Local Plan which maximises sustainable development opportunities whilst protecting the quality of the environment for local residents, businesses and visitors.		
Scenario 1: A sub region with a South East regional focus.	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</p> <p>This scenario would maximise development opportunities within the borough and continue to work with others to encourage allocations of land outside the borough boundary to accommodate all of Crawley's emerging housing and employment needs.</p> <p>The potential impacts on climate change are uncertain as whilst increased development would generate higher levels of emissions, locations within and close to the existing built up area would ensure access to main employment areas and existing neighbourhoods, minimising the need for longer distance car travel (Criteria 1 and 7).</p> <p>Crawley borough suffers from significant surface water flooding. The remaining green space networks within the borough and on the edge of the borough provide an important function which would be lost/reduced substantially by significant development levels (Criteria 2).</p> <p>Maximising development opportunities within, and adjacent to, the borough to the level required to meet all employment and housing needs arising would require high densities which may not be sympathetic to the lower-rise character of Crawley's neighbourhoods and unrestricted additional developments on the edge of the built-up area would undermine the 'town in a countryside setting' as envisaged by the original new town masterplan (Criteria 3).</p> <p>Meeting Crawley's objectively assessed housing need would provide sufficient affordable housing within close proximity to the town to meet the council's reasonable preference waiting list (Criteria 4).</p> <p>Providing sufficient land for meeting the projected employment needs would allow for the continuing of the town's strong regional economic position and its growth, in terms of both quantity and quality, in line with the indications of the business community's preference (Criteria 5).</p> <p>Many of the remaining undeveloped sites within the borough provide important roles for biodiversity and landscape (Criteria 6).</p> <p>Further developments within the built environment will provide greater pressures on existing infrastructure, whilst new substantial, well-planned urban extensions adjacent to Crawley would provide new infrastructure to meet the needs of the development (Criteria 8).</p> <p>The impact on sustainable communities is uncertain (Criteria 9).</p> <p>Development at this level is considered would have a significant negative impact on Criteria 10, as it would require substantial loss of open space sites identified through Local Plan evidence as being critical in their function for the town and encouraging healthy lifestyles, in terms of their quantity, quality and accessibility to the borough's residents, employees and visitors. Pressures would also be placed on the existing formal health infrastructure providers, which in some neighbourhoods are already performing at, over, or close to, capacity.</p>		
Scenario 2: A sub regional focus.	1. minimise climate change	+	Mitigation required as no negative impacts identified. However, there is a degree of uncertainty relating to deliverability of housing and employment development at levels, and in the right locations and at the right cost, sufficient to meet the projected needs of Crawley when reliant on neighbouring authorities; along with the uncertainty relating to deliverability of sufficient infrastructure for any developments
	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	

			<p>immediately adjacent to, or impacting on, Crawley's boundaries when being delivered by a different administrative authority.</p> <p>Therefore, it is felt that to ensure Crawley is responsibly planning for the growth from the existing population and businesses it should be maximising the development potential within the borough's administrative boundaries as far as is possible and consistent with the principles of sustainable development, through considering a combination with the approach under Scenario 3.</p>
<p>Commentary</p> <p>Careful planning and ensuring developments constitute sustainable development will allow for positive impacts for Criteria 1, 2, 3, 6, 7, 8 and 9.</p> <p>The levels of objectively assessed needs for housing and employment may not be met in full when considering against the physical, environmental and infrastructure constraints but the sub-regional focus will mean continued work with neighbouring authorities to encourage allocations of land to accommodate Crawley's unmet housing and employment need.</p>			
<p>Scenario 3: Crawley Borough focus</p>	<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 	<p style="text-align: center;">+ ? -? ++ ++ -- ++ + + --</p>	<p>Mitigation is required to ensure the maximising land available for development within the borough is not at a cost to the other important aspects of sustainable development – particularly in relation to the good, planned nature of the borough – amenity open spaces, structural landscaping, important views and tree coverage; as well as locally important sites of environmental and historical importance and green infrastructure.</p> <p>This mitigation measure will result in a strict application of this Scenario to be not physically possible due to the land constraints within the borough, and therefore would require any unmet need to be accommodated outside of the borough – through Duty to Cooperate and considering a combination approach with Scenario 2.</p>
<p>Commentary</p> <p>Ensuring development is concentrated in Crawley would support minimising the impacts on climate change by reducing the need to travel by car and by offering opportunities for district heating schemes (Criteria 1 and 7).</p> <p>Meeting Crawley's objectively assessed housing need would provide sufficient affordable housing within close proximity to the town to meet the council's reasonable preference waiting list (Criteria 4).</p>			

	<p>Providing sufficient land for meeting the projected employment needs would allow for the continuing of the town's strong regional economic position and its growth, in terms of both quantity and quality, in line with the indications of the business community's preference (Criteria 5).</p> <p>Careful planning and ensuring developments constitute sustainable development may allow for positive impacts for Criteria 8 and 9.</p> <p>However, the level of development required to meet all of Crawley's needs within its boundaries would involve allocation of all remaining space within the borough's boundaries, therefore, development at this level is considered would have a significant negative impact on Criteria 10, as it would require substantial loss of open space sites identified through Local Plan evidence as being critical in their function for the town and encouraging healthy lifestyles, in terms of their quantity, quality and accessibility to the borough's residents, employees and visitors. Pressures would also be placed on the existing formal health infrastructure providers, which in some neighbourhoods are already performing at, over, or close to, capacity.</p> <p>Negative impacts would be caused by maximising development opportunities within the borough to the level required to meet all employment and housing needs arising. This would require such high densities which would not always be sympathetic to the lower-rise character of Crawley's neighbourhoods and leading to town-cramming and loss of the key green infrastructure character which was planned as part of the original New Town (Criteria 2, 3 and 6).</p>
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APPENDIX F: SUBMISSION LOCAL PLAN POLICIES OPTIONS AND APPRAISAL

Each of the Local Plan Submission policies and their options has been assessed against the Sustainability Objectives. These have been set out in the following boxes structured in Local Plan Chapter order.

Sustainable Development

Policy SD1: Presumption in Favour of Sustainable Development			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 3: Adapt the Model Presumption in Favour of Sustainable Development Policy wording devised by PINs and include local issues identified through the Local Plan evidence base. Option 3 has been chosen		
Option 1: Rely on the 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 	<p>+?</p> <p>+?</p> <p>+?</p> <p>+?</p> <p>+?</p> <p>+?</p> <p>+?</p> <p>+?</p> <p>+?</p> <p>+?</p>	
<p>Commentary</p> <p>The positive influence from relying on the NPPF is questionable. Much of the justification for local designations is necessary through local evidence tested at examination. The greatest strength will come from being within an adopted and up-to-date Local Plan.</p> <p>Recent examples of Inspectors' decisions have indicated the Planning Inspectorate expect Local Planning Authorities to include a policy based on the NPPF presumption in favour of sustainable development, and have produced a 'model policy' to pursue this.</p>			
Option 2: Use the Model Presumption in Favour of Sustainable Development Policy wording devised by PINs.	<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 	<p>+?</p> <p>+?</p> <p>+?</p> <p>+?</p> <p>+?</p> <p>+?</p> <p>+?</p> <p>+?</p> <p>+?</p>	
<p>Commentary</p> <p>Recent examples of Inspectors' decisions have indicated the Planning Inspectorate expect Local Planning Authorities to include a policy based on the NPPF presumption in favour of sustainable development, and have produced a 'model policy' to pursue this.</p> <p>The model policy is based solely on the NPPF wording, and it is considered that the positive influence of this is limited, as it does not take into account the Crawley-specific issues which have been identified through evidence gathering.</p>			
Option 3: Adapt the Model	1. Minimise climate change	++	Mitigation not required as no

Presumption in Favour of Sustainable Development Policy wording devised by PINs and include local issues identified through the Local Plan evidence base.	2. Adapt to climate change	++	negative impacts identified.
	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 With using the NPPF/PINs model policy alongside Crawley's Local Plan evidence base it is possible to ensure the presumption in favour of sustainable development reflects and is justified against Crawley-specific issues and understandings. The positive influence on SO 4 and 5 is still uncertain due to the physical land constraints within the borough.			
Option 4: Create a new Policy based solely on local evidence.	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 Whilst the use of Local Plan evidence would ensure the policy is locally justified and specific, it may not meet the NPPF/PINs requirements.			

Character

Policy CH1: Neighbourhood Principle			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>Option 1: Develop a local plan policy to protect and enhance the character of Crawley's neighbourhood structure.</p> <p>Option 1 has been chosen because 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.</p>		
Option 1: Develop a local plan policy to protect and enhance the character of Crawley's neighbourhood structure.	<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 	<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 style="text-align: center;">++</p>	Mitigation not required as no negative impacts identified.
	<p>Commentary:</p> <p>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.	<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 	<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:</p> <p>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</p>		

	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 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: Principles of Good Urban Design			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>Option 1: Create a new policy within the Local Plan that sets out seven principles of good design that applicants should adhere to.</p> <p>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.</p>		
Option 1: Create a new policy within the Local Plan that sets out seven 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 	<p style="text-align: center;">+ + ++ + + + + + + +</p>	Mitigation not required as no negative impacts identified.
	<p>Commentary</p> <p>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). There might be a possibility that there will be less development within the borough, since a local policy is likely to be more restrictive with regards to the over-development of a site (SA Objective 4, 5 & 7). However, an attractive and well designed development may create opportunities for additional dwellings and encourage further investment into the town.</p>		
Option 2: Delete the existing policy and rely on the 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 	<p style="text-align: center;">+ + + + + + + + + +</p>	
	<p>Commentary</p> <p>High quality design is a specific requirement of the NPPF. The presumption in</p>		

	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.
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Policy CH3: Normal Requirements of All New Development			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>Option 1: Create a new policy within the Local Plan that sets out seven requirements that applicants should adhere to.</p> <p>Option 1 has been chosen to enable planning applications to be assessed against seven factors that contribute to the creation of high quality development (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).</p>		
Option 1: Create a new policy within the Local Plan that sets out seven requirements 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 	<p>++</p> <p>++</p> <p>++</p> <p>+</p> <p>+?</p> <p>+</p> <p>++</p> <p>+</p> <p>+</p> <p>+</p>	Mitigation not required as no negative impacts identified.
	<p>Commentary</p> <p>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 reduce with more restrictive policies (SA Objective 5) but creative design could identify opportunities for additional development and encourage further investment via an improvement to 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 	<p>+?</p> <p>+</p> <p>+?</p> <p>+?</p> <p>+</p> <p>-</p> <p>+</p> <p>+?</p> <p>+</p> <p>+</p>	
	<p>Commentary</p> <p>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</p>		

	<p>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>
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Policy CH4: Comprehensive Development and Efficient Use of Land			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>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.</p> <p>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).</p>		
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.	<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 	<p style="text-align: center;">+ + + ++ ++ + + + + /</p>	Mitigation not required as no negative impacts identified.
<p>Commentary</p> <p>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).</p>			
Option 2: Delete policy and rely on the 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 	<p style="text-align: center;">- + + -? -? + - -? +</p>	

	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 CH5: Standards for All New Dwellings (including conversions)			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 1: To include standards for external and internal space within a Local Plan Policy. Option 1 was chosen to provide greater levels of certainty for the development industry and to ensure the homes built within Crawley offer the necessary quality of life standards expected. It is considered to be the most sustainable option, offering the most positive impacts.		
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 10. Encourage active lifestyles	+ + ++ ++ 0 + 0 0 + +	Mitigation not required as no negative impacts identified.
	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 outdoor space allows for sufficient outdoor drying space, reducing pressures on electrical usage, and increases natural surface water infiltration, evaporation or harvesting, therefore reducing runoff. There is also the potential to conserve and enhance biodiversity and landscape when these are taken into account during the design and layout of a development scheme. Suitable homes with sufficient space and the potential for adaptation are likely to be more sustainable over the life of the dwelling. 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, and on 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.		
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	+? +? +? +? 0 +?	

	7. Promote sustainable journeys	0	
	8. Provide sufficient infrastructure	0	
	9. Promote sustainable communities	?	
	10. Encourage active lifestyles	?	
	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.		
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	0	
	2. Adapt to climate change	0	
	3. Protect/enhance built environment	+?	
	4. Decent, affordable homes	0	
	5. Maintain/support employment	0	
	6. Conserve/enhance biodiversity and landscape	0	
	7. Promote sustainable journeys	0	
	8. Provide sufficient infrastructure	0	
	9. Promote sustainable communities	0	
	10. Encourage active lifestyles	0	
	Commentary Without any local policy it would be impossible to insist on locally distinctive standards or provide certainty.		

Policy CH6: Tree Planting and Replacement Standards			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 1: A policy will be created in the Local Plan requiring additional planting to mitigate the visual impact of new development or the loss of existing trees. Option 1 has been chosen as additional or replacement tree planting would have a very positive impact on SA objectives 1, 2, 3 and 6, and some positive impact in relation to objectives 7, 9 and 10. There would be a neutral impact on the provision in respect of objectives 4, 5 and 8 although a more attractive environment could assist in attracting investment.		
Option 1: A policy will be created in the Local Plan requiring additional planting to mitigate the visual impact of new development or the loss of existing trees.	1. Minimise climate change	++	Mitigation not required as no negative impacts identified.
	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 Option 1 has been chosen as additional or replacement tree planting would have a very positive impact on SA objectives 1, 2, 3 and 6, and some positive impact in relation to objectives 7, 9 and 10. There would be a neutral impact on the provision in respect of objectives 4, 5 and 8 although a more attractive environment could assist in attracting investment.		
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			
The NPPF offers general guidance in terms of dealing with impacts and mitigation but does require development to be of a high design standard. This approach would not necessarily deliver as many additional or replacement trees, which are an important component of the town's character and appearance and offer other benefits (SA objectives 1, 2, 3, 6, 7 9 and 10). The approach may be slightly more positive in terms of the amount of development (SA objectives 4, 5 and 8).			

Policy CH7: Structural Landscaping			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>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/or enhanced.</p> <p>Option 1 was chosen because 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.</p>		
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/or 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	+ + + +? +? ++ + +? + +	Mitigation not required as no negative impacts identified.
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	1. Minimise climate change	-	

rely on NPPF.	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 CH8: Important Views			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 1: 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. Option 1 has been chosen, 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: 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.	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	+ + ++ ? ? ++ + + + +	Mitigation not required as no negative impacts identified.
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 CH9: Development outside the Built-Up Area			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 1: Develop local policy to maintain Crawley's compact nature and attractive setting whilst conserving and enhancing the countryside. 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. 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. 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.		
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	+ ? + ? / + + ? + +	Mitigation not required as no negative impacts identified.
	Commentary This enables landscape of local importance to be conserved but also allow development where it respects the surrounding character. It also provides the evidence base to support green infrastructure opportunities and proposals.		
Option 2: Rely on national guidance solely.	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 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 chosen.		
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 chosen.		

Policy CH10: High Weald Area of Outstanding Natural Beauty			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 1: Having regard to the AONB Management Plan when considering proposals in the AONB. Having regard to the AONB designation and the AONB Management plan is the most suitable option as AONB land is highly valued for its contribution to the landscape.		
Option 1: Having regard to the AONB Management Plan when considering proposals in the AONB.	1. Minimise climate change	?	Mitigation not required as no negative impacts identified.
	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 Respecting the high value landscape of the wider AONB is of benefit to residents of Crawley and those who live and work in the AONB.		
Option 2: Not recognising the AONB Management Plan and requiring a local	1. Minimise climate change	-	
	2. Adapt to climate change	-	
	3. Protect/enhance built	+	

assessment of the area.	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			
The AONB Unit has been set up to advise on AONB matters and Local Authorities work with them to shape and agree the Management Plan. To not rely on this could negatively impact the role and aims of the AONB.			

Policy CH11: Rights of Way and Access to the Countryside			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 1: Maintain and enhance Public Rights of Way. The most suitable option is to maintain and enhance PRoW as it has most positive impact on sustainability.		
Option 1: Maintain and enhance Public Rights of Way.	1. Minimise climate change	0	Mitigation not required as no negative impacts identified.
	2. Adapt to climate change	0	
	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	++	
	8. Provide sufficient infrastructure	+	
	9. Promote sustainable communities	+	
	10. Encourage active lifestyles	++	
Commentary			
This option encourages use of rights of way for health and well-being as well as a route to get to work or other locations.			
Option 2: Rely on the NPPF.	1. Minimise climate change	0	
	2. Adapt to climate change	0	
	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	?	
	8. Provide sufficient infrastructure	?	
	9. Promote sustainable communities	?	
	10. Encourage active lifestyles	?	
Commentary			
Relying on the NPPF creates uncertainty as there is little detail on how PRoW should be protected or identification of specific opportunities to enhance PRoW.			

Policy CH12: Heritage Assets			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>Option 3: Include overarching policy for all heritage assets (including undesignated heritage assets), with policies relating to specific types of designated assets within Crawley.</p> <p>Option 3 has been chosen as it represents the best way to adhere to the NPPF and ensure that the requirements on development relate to the significance of the heritage asset in question. By setting minimum requirements for all heritage assets (designated & undesignated) the basic requirements are set, this can then be built upon utilising further policies relating to specific designations relating to their significance.</p>		
Option 1: Have no policy in heritage assets.	<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 	<p>/</p> <p>/</p> <p>--</p> <p>0</p> <p>0</p> <p>0</p> <p>0</p> <p>0</p> <p>0</p> <p>0</p> <p>0</p>	
<p>Commentary</p> <p>The NPPF instructs Local Planning Authorities to include a “positive strategy for the conservation and enjoyment of the historic environment”. Therefore option 1, which is not to include anything is not an option.</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>			
Option 2: Include single policy relating to all heritage assets (including undesignated heritage assets) with no other policies.	<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 	<p>/</p> <p>/</p> <p>+</p> <p>0</p> <p>0</p> <p>0</p> <p>0</p> <p>0</p> <p>0</p> <p>0</p> <p>0</p>	
<p>Commentary</p> <p>It was considered that a single policy may be appropriate for all heritage assets however upon reflection the need to consider the impact on heritage assets in relation to their significance would be hard to achieve. This may result in a policy that was over restrictive on lesser assets whilst not going far enough when looking at very significant assets. It would also struggle to make variations in the policy implications for local or nationally designated assets. Therefore this option was not progressed.</p>			
Option 3: Include overarching policy for all heritage assets (including	<ol style="list-style-type: none"> 1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built 	<p>/</p> <p>/</p> <p>++</p>	Mitigation not required as no negative impacts identified.

undesigned heritage assets), with policies relating to specific types of designated assets within Crawley.	environment		
	4. Decent, affordable homes	0	
	5. Maintain/support employment	0	
	6. Conserve/enhance biodiversity and landscape	0	
	7. Promote sustainable journeys	0	
	8. Provide sufficient infrastructure	0	
	9. Promote sustainable communities	0	
	10. Encourage active lifestyles	0	
Commentary			
This policy provides the ability to adopt an approach for each Heritage Asset at a level that is appropriate to its significance. By having a series of policy, the council will be able to provide clarity to a developer as to what will be required when working on different projects.			

Policy CH13: Conservation Areas			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 2: Include Policy for Conservation Area designation. Option 2 was selected as it scored better on the Sustainability Appraisal and will allow for the better management of development in Conservation Areas over the Plan period.		
Option 1: Do not include a policy relating to Conservation Areas. Relying on a single overarching policy.	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	0	
	7. Promote sustainable journeys	0	
	8. Provide sufficient infrastructure	0	
	9. Promote sustainable communities	0	
	10. Encourage active lifestyles	0	
Commentary			
This approach would result in a negative effect upon the need to protect/enhance the built environment and could lead to the loss of Heritage Assets for the reasons outlined in the appraisal for CH11. This option was ruled out due to the preferred option from CH11.			
Option 2: Include Policy for Conservation Area designation.	1. Minimise climate change	/	Mitigation not required as no negative impacts identified.
	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	0	
	7. Promote sustainable journeys	0	
	8. Provide sufficient infrastructure	0	
	9. Promote sustainable communities	0	
	10. Encourage active lifestyles	0	
Commentary			
A policy relating to Conservation Areas will effectively protect/enhance the built environment in a manner relevant to its significance. It will also enable policy			

	requirements specifically relating to Conservation Areas to be introduced, such as the loss of certain buildings may be acceptable.
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Policy CH14: Areas of Special Local Character

Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 3: Include policy for ASLC's designation. Option 3 has been chosen to ensure that the local ASLC designation is given the correct weight in planning decisions relevant to its significance.		
Option 1: Do not include a policy relating to ASLC's. Relying on a single overarching 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 10. Encourage active lifestyles	+? +? -- 0 0 0 0 0 0 0 0	
	Commentary This approach would result in a negative effect upon the need to protect/enhance the built environment and could lead to the loss of Heritage Assets for the reasons outlined in the appraisal for CH11. This option was ruled out due to the preferred option from CH11. This option would not give significant weight to 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.		
Option 2: Include policy for all Local Designations.	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 A policy relating to ASLC's and Locally Listed Buildings was considered as a way of reducing the number of policies in the plan however the sustainability appraisal showed that as the policy would not be specific enough the benefits of the policy would be restricted. Whilst it may have allowed greater flexibility across both of these designations it would not have been effective enough.		
Option 3: Include policy for ASLC's designation.	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	/ / ++ ? 0 0	Mitigation not required as no negative impacts identified.

	and landscape		
	7. Promote sustainable journeys	0	
	8. Provide sufficient infrastructure	0	
	9. Promote sustainable communities	0	
	10. Encourage active lifestyles	0	
Commentary			
By including a policy for the ASLC's specific requirements can be set in accordance with their significance and the objectives of the designation.			

CH15: Listed Buildings and Structures			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 3: Include Policy for Listed Buildings & Structures. Option 3 has been chosen to ensure that the Listed Buildings are given the correct weight in planning decisions relevant to their significance. Whilst Listed Buildings are protected by law, including a specific policy that will apply to them will ensure that the planning system does not overlook the designation and afford their significance due weight.		
Option 1: Do not include a policy relating to Listed Buildings & Structures. Relying on a single overarching 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 10. Encourage active lifestyles	+? +? -- +? 0 0 0 0 0 0	
Commentary This approach would result in a negative effect upon the need to protect/enhance the built environment and could lead to the loss of Heritage Assets for the reasons outlined in the appraisal for CH11. This option was ruled out due to the preferred option from CH11. This option would not give significant weight to listed buildings & structures 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.			
Option 2: Include policy for all National Designations.	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 A policy relating to all national designations was considered as a way of reducing the number of policies in the plan however the sustainability appraisal showed that as the			

	policy would not be specific enough the benefits of the policy would be restricted. Whilst it may have allowed greater flexibility across designations it would not have been effective enough.		
Option 3: Include policy for Listed Buildings & Structures.	<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 	<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;">0</p> <p style="text-align: center;">0</p> <p style="text-align: center;">0</p> <p style="text-align: center;">0</p> <p style="text-align: center;">0</p> <p style="text-align: center;">0</p>	Mitigation not required as no negative impacts identified.
	<p>Commentary</p> <p>By including a policy that reflects the significance of listed buildings and structures, the requirements can be set in accordance with their significance and the objectives of the designation. This option scored highest on the sustainability appraisal so was chosen.</p>		

Policy CH16: Locally Listed Buildings			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option:	<p>Option 3: Include policy for Locally Listed Buildings.</p> <p>Option 3 has been chosen to ensure that the Locally Listed Building designation is given the correct weight in planning decisions relevant to its significance.</p>		
Option 1: Do not include a policy relating to Locally Listed Buildings. Relying on a single overarching policy.	<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 	<p style="text-align: center;">+?</p> <p style="text-align: center;">+?</p> <p style="text-align: center;">--</p> <p style="text-align: center;">0</p> <p style="text-align: center;">0</p> <p style="text-align: center;">0</p> <p style="text-align: center;">0</p> <p style="text-align: center;">0</p> <p style="text-align: center;">0</p> <p style="text-align: center;">0</p> <p style="text-align: center;">0</p>	
	<p>Commentary</p> <p>This approach would result in a negative effect upon the built environment and could lead to the loss of Heritage Assets for the reasons outlined in the appraisal for CH11. This option was ruled out due to the preferred option from CH11.</p> <p>This option would not give significant weight to 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>		
Option 2: Include policy for all Local Designations.	<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 	<p style="text-align: center;">?</p> <p style="text-align: center;">?</p> <p style="text-align: center;">+</p> <p style="text-align: center;">0</p> <p style="text-align: center;">0</p> <p style="text-align: center;">0</p>	

	7. Promote sustainable journeys	0	
	8. Provide sufficient infrastructure	0	
	9. Promote sustainable communities	0	
	10. Encourage active lifestyles	0	
	Commentary A policy relating to ASLC's and Locally Listed Buildings was considered as a way of reducing the number of policies in the plan however the sustainability appraisal showed that as the policy would not be specific enough the benefits of the policy would be restricted. Whilst it may have allowed greater flexibility across both of these designations it would not have been effective enough.		
Option 3: Include policy for Locally Listed Buildings.	1. Minimise climate change	/	
	2. Adapt to climate change	/	
	3. Protect/enhance built environment	++	
	4. Decent, affordable homes	?	
	5. Maintain/support employment	0	
	6. Conserve/enhance biodiversity and landscape	0	
	7. Promote sustainable journeys	0	
	8. Provide sufficient infrastructure	0	
	9. Promote sustainable communities	0	
	10. Encourage active lifestyles	0	
	Commentary This option has been chosen as provides the best outcome. Ensuring development matched the significance of the heritage asset is key and by ensuring policy reflects this is vital to ensure the built environment is protected and enhanced as we move forwards.		

Policy CH17: Historic Parks and Gardens			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option:	Option 2: Include policy for Historic Parks & Gardens. Option 2 was chosen as it provides the best protection of important features which make up the designated park/garden.		
Option 1: Do not include a policy relating to Historic Parks & Gardens. Relying on a single overarching policy.	1. Minimise climate change	0	
	2. Adapt to climate change	0	
	3. Protect/enhance built environment	--	
	4. Decent, affordable homes	-	
	5. Maintain/support employment	0	
	6. Conserve/enhance biodiversity and landscape	-	
	7. Promote sustainable journeys	0	
	8. Provide sufficient infrastructure	0	
	9. Promote sustainable communities	0	
	10. Encourage active lifestyles	0	
	Commentary Without the designation and supporting evidence there would be uncertainty as to the features to protect. This could lead to important features being lost or over protection of areas.		
Option 2: Include policy for Historic Parks & Gardens.	1. Minimise climate change	0	Potential negative impact on SO4 will be mitigated against through the identification of key housing sites within Policy H2, and moreover,
	2. Adapt to climate change	0	
	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 +	meeting as much of the objectively assessed housing need within the administrative boundaries of Crawley, unless constraints dictate otherwise.
<p>Commentary</p> <p>By identifying the Historic Parks and Gardens 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>			

Economic Growth

Policy EC1: Sustainable Economic Growth			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>Option 3: Draw upon the EGA findings to recognise the role of Crawley as a key business and employment destination. Using the Employment Land Trajectory (July 2014) onwards, adopt a supply-led approach for the early years of the Plan period, whilst taking a sequential approach, working with neighbouring authorities as necessary, in planning positively to meet identified growth over the Plan period to 2030.</p> <p>Through implementing a locally and spatially specific policy that draws upon evidence from the EGA and the Employment Land Trajectory, 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 as a focus for the wider sub-region. Option 3 seeks to accommodate the EGA baseline level growth (itself recognised as positive planning) in a sustainable manner by taking a sequential approach that in the first instance directs growth to existing employment areas in order to accommodate need in the early years of the Plan. The approach provides scope to identify some additional land outside the main employment area boundary in early years, that extend Manor Royal, where land is not affected by safeguarding. For later years, the approach recognises that a decision as to the future of Gatwick Airport safeguarding will determine whether unmet employment need can be accommodated within Crawley, or whether it will be necessary to work alongside adjoining authorities to assess the scope to accommodate unmet business needs at, or near, Crawley, or within the wider Gatwick Diamond. For this reason, Option 3 is considered to represent the most sustainable and pragmatic approach moving forward, and is identified as the chosen option.</p>		
Option 1: Rely only on the National Planning Policy Framework to ensure that any identified economic growth is supported and ensure that employment is directed to the most appropriate and sustainable locations.	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	?	
	6. Conserve/enhance biodiversity and landscape	0	
	7. Promote sustainable journeys	?	
	8. Provide sufficient infrastructure	0	
	9. Promote healthy, active, cohesive and socially sustainable communities	0	
	10. Encourage active lifestyles	0	
	<p>Commentary:</p> <p>This approach would rely on the NPPF as a means of directing employment to the most appropriate and sustainable locations.</p> <p>A reliance solely on the NPPF would ignore the need for a holistic vision for economic growth in Crawley and its impact on the wider economic function of the sub-region over the Plan period, particularly as the approach would fail to take account of locally specific circumstances identified in the Economic Growth Assessment. Without a locally-specific strategy in place, there is risk that the economic growth requirements of the borough and the wider sub-region will not be adequately planned for or accommodated. This is particularly the case given Crawley's limited land supply, which necessitates a clear strategic vision and policy approach through the Local Plan in order to balance the conflicting needs of housing and employment provision. Absence of a clear policy approach directing employment growth to the most sustainable locations potentially creates uncertainty as to how employment and housing needs will be accommodated. Without a clear local vision that places Crawley at the centre of the economic growth for the wider area, there is a risk that Crawley's key economic function will be eroded, potentially impacting negatively upon the growth within Crawley and the</p>		

	wider Gatwick Diamond.		
Option 2: Having regard to the EGA findings, adopt a spatial approach which recognises Crawley as a key employment destination and applies a supply-led approach (drawing on the Employment Land Trajectory) to direct identified baseline business-led employment need to existing available employment sites within the borough. Plan only for need that can be accommodated in Crawley, and do not consider options to accommodate unmet growth.	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	-	
	6. Conserve/enhance biodiversity and landscape	?	
	7. Promote sustainable journeys	?	
	8. Provide sufficient infrastructure	?	
	9. Promote healthy, active, cohesive and socially sustainable communities	?	
	10. Encourage active lifestyles	0	
	<p>Commentary:</p> <p>The EGA forecasts baseline demand in Crawley for B class uses alone as requiring 77 hectares. The EGA identified an existing employment land supply pipeline of 35 hectares. The Employment Land Trajectory (July 2014) identifies an available business land supply of 44 hectares, leaving a shortfall of 33 hectares.</p> <p>Under Option 2, the Local Plan would take a supply-led approach to accommodate as much of the required 77 hectares as can be reasonably planned for. On this basis, the Local Plan would be able to identify approximately 44 hectares of business-led employment land supply, leaving a significant unmet need of around 33 hectares employment land, meaning that the identified baseline need for business land at Crawley would not be met over the Local Plan period.</p> <p>There is a risk with this approach (as recognised within the EGA) that jobs which could potentially be located at Crawley will be redistributed elsewhere within the Gatwick Diamond. If sufficient, suitable land cannot be found within the Diamond, there is significant risk that identified job opportunities could be lost to locations outside the Gatwick Diamond, jeopardising the economic function of both Crawley and the Gatwick Diamond. In failing to plan for longer-term business needs, the approach leaves Crawley vulnerable to inappropriate applications and increases the risk of planning by appeal. Further, through failing to pro-actively engage with adjoining authorities, the approach fails to meet the requirements of Duty to Cooperate.</p>		
Option 3: Draw upon the EGA findings to recognise the role of Crawley as a key business and employment destination. Using the Employment Land Trajectory (July 2014), adopt a supply-led approach for the early years of the Plan period, whilst taking a sequential approach, working with neighbouring authorities as necessary, in planning positively to meet identified growth over the Plan period to 2030.	1. To minimise climate change	?	Mitigation not required as no negative impacts identified.
	2. To adapt to climate change	?	
	3. Protect/enhance built environment	0	
	4. Decent, affordable homes	+	
	5. Maintain/ support employment base	++	
	6. Conserve/enhance biodiversity and landscape	?	
	7. Promote sustainable journeys	++	
	8. Provide sufficient infrastructure	+	
	9. Promote healthy, active, cohesive and socially sustainable communities	+	
	10. Encourage active lifestyles	0	
	<p>Commentary:</p> <p>The EGA forecasts baseline demand in Crawley for B class uses alone as requiring 77 hectares. The EGA identified an existing employment land supply pipeline of 35 hectares. The Employment Land Trajectory (July onwards 2014) identifies an available business land supply of 44 hectares, leaving a shortfall of 33 hectares.</p> <p>The Local Plan identifies approximately 44 hectares of business-led employment land supply, leaving a significant unmet need of around 33 hectares employment land, and it is necessary establish a framework to explore and where possible identify new employment sites, potentially including minor extensions to Manor Royal, and/or new strategic employment location(s).</p> <p>To achieve this, the Local Plan would apply a sequential approach to the identification of new employment land. The initial focus would be to identify land</p>		

	<p>within Crawley adjacent to the Built Up Area Boundary as possible opportunities to deliver minor extensions to Manor Royal Business District.</p> <p>Beyond this, the EGA also identifies a requirement for a Strategic Employment Location, particularly in the mid to later years of the plan period (year 10 onwards), ideally within Crawley as the most sustainable location. Land to the north of Manor Royal and south or east of the airport is the preferred location for a SEL, representing an opportunity to complement the existing offer of Manor Royal and close proximity to Gatwick Airport, whilst building upon established transport and infrastructure connections.</p> <p>However, with safeguarding for a potential second runway representing a fundamental delivery constraint at present, locations at or beyond Crawley's administrative boundary may need to be considered. Therefore, a policy would need to apply a sequential approach to identify the most appropriate location for Strategic Employment Location(s). Should it not be possible to identify location(s) within Crawley, this policy needs to outline a commitment to work alongside adjoining authorities, to scope the feasibility of allocating land for a SEL either 'at Crawley/Gatwick immediately adjoining the borough', and if this cannot be achieved, land near to Crawley within the wider Heart of the Gatwick Diamond. This also ensures that the focus of new employment development is located in proximity to the economic hub of the town at Manor Royal, and where housing would not be appropriate given the noise and other environmental constraints.</p> <p>Having regard to Crawley's significant business-led employment growth requirement, it is considered that the Option 3 approach represents the most pragmatic, deliverable and sustainable approach, reflecting the requirements of Duty to Cooperate and having regard to the economic function of Crawley and its role within the Gatwick Diamond.</p>		
<p>Option 4: Draw upon the EGA findings to recognise the role of Crawley as a key business and employment destination. Using the Employment Land Trajectory (July 2014), seek to identify land within Crawley to accommodate all 77 hectares of the identified business-led employment land requirement.</p>	<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 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote healthy, active, cohesive and socially sustainable communities 10. Encourage active lifestyles 	<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;">0</p> <p style="text-align: center;">-</p> <p style="text-align: center;">0</p>	
<p>Commentary:</p> <p>The EGA forecasts baseline demand in Crawley for B class uses alone as requiring 77 hectares. The EGA identified an existing employment land supply pipeline of 35 hectares. The Employment Land Trajectory (July onwards 2014) identifies an available business land supply of 44 hectares, leaving a shortfall of 33 hectares. In order to meet the identified need of 77 hectares business-led employment land, either safeguarding would need to be lifted, or consideration would need to be given to introducing employment uses on sites that have been identified for housing.</p> <p>The Employment Land Trajectory (July onwards 2014) identifies an initial business land supply of 44 hectares in years 0-5 of the Local Plan period. In later years, other sites including those currently constrained by safeguarding and which are being promoted by land owners, could potentially provide around 18 hectares land in Years 6-10 and 76 hectares land in Years 11-15. However, these sites are currently severely constrained by Gatwick Airport. There is also risk that use of greenfield land could result in the loss of land that currently is identified as countryside, with areas of ancient woodland, rural fringe, and environmental constraints such as flooding and wider and bio-diversity representing key considerations.</p> <p>There is also a need to balance employment growth with housing delivery. The limited amount of developable land in Crawley has required a balance to be struck when identifying employment and housing sites. Crawley's objectively assessed housing need is significant, and it is considered that all sites identified within the</p>			

	<p>Local Plan for housing will be required to help meet housing need. Further, there is risk that introducing employment uses on land that has been identified for housing is unlikely to be acceptable in amenity or environmental terms, introducing a non-conforming uses that is not consistent with the function of the wider area.</p> <p>Therefore, at the present time land cannot readily be identified to accommodate the full 77 hectare baseline land requirement identified within the EGA, until a decision on the future of safeguarded land is made.</p>		
<p>Option 5: Draw upon the EGA findings to recognise the role of Crawley as a key business and employment destination. Using the Employment Land Trajectory (July 2014), seek to identify land within Crawley to accommodate EGA higher growth scenarios of 87 or 110 hectares.</p>	<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 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote healthy, active, cohesive and socially sustainable communities 10. Encourage active lifestyles 	<p>-</p> <p>-</p> <p>--</p> <p>--</p> <p>++</p> <p>--</p> <p>+</p> <p>-</p> <p>-</p> <p>0</p>	
<p>Commentary:</p> <p>The EGA forecasts baseline demand in Crawley for B class uses alone as requiring 77 hectares. The EGA identified an existing employment land supply pipeline of 35 hectares. The Employment Land Trajectory (July 2014) identifies an available business land supply of 44 hectares, leaving a shortfall of 33 hectares.</p> <p>The EGA also forecast higher growth scenarios which identified a theoretical potential requirement for 87.6 hectares or 110.1 hectares additional business-led employment land at Crawley.</p> <p>There is simply not sufficient land available within the borough to accommodate the substantial level of growth identified by the higher growth scenarios unless airport safeguarding is lifted.</p> <p>Progressing with either of the higher growth scenarios would negate the overall Local Plan approach to balancing housing delivery with economic growth or infrastructure delivery. It would also result in the loss of land that currently is identified as countryside, with areas of ancient woodland, rural fringe, environmental constraints such a flooding and wider and biodiversity considerations.</p>			

Policy EC2: Economic Growth in Main Employment Areas			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>Option 3: Adopt a spatial approach, identifying key employment sites to direct economic growth to the most sustainable and appropriate locations.</p> <p>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 in the most sustainable and appropriate locations.</p>		
Option 1: Rely only on the National Planning Policy Framework to ensure that economic growth is directed to the most sustainable and appropriate locations.	<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 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote healthy, active, cohesive and socially sustainable 	<p>-?</p> <p>-?</p> <p>0</p> <p>0</p> <p>--</p> <p>0</p> <p>-?</p> <p>0</p> <p>-?</p>	

	communities		
	10. Encourage active lifestyles	0	
	<p>Commentary:</p> <p>This approach would rely on the NPPF as a means of directing employment to the most appropriate and sustainable locations.</p> <p>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).</p> <p>In this sense there is concern that a reliance solely on the NPPF would be to ignore the need for a holistic local and sub-regional vision for economic growth in Crawley over the Plan period and would ignore key locally specific functions and characteristics of the economic function of the town and its inter-relationship with the wider sub-region. This is a particular concern as the approach would not take into account significant locally specific circumstances set out in the Economic Growth Assessment, which identifies a clear need to prioritise Manor Royal as a location for business and supporting uses that enhance the business function of the district, whilst allowing greater flexibility in other Main Employment Areas.</p> <p>Option 1 does not set out a clear strategy based on locally-specific evidence, and there is risk that the economic growth of the borough (and the wider sub-region) could not therefore be delivered in a planned manner. Given Crawley's role as a sub-regional employment destination at the heart of the Gatwick Diamond, to rely solely on national planning policy without having regard to evidence base, would not represent a sound planning approach to delivering sustainable economic development.</p> <p>Without a clear local vision and employment hierarchy, it is uncertain how economic growth could be directed to the most sustainable locations, or clarity be provided to key investors and land owners. 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>		
Option 2: Roll forward the adopted Core Strategy (2008) approach to resist the loss of any employment sites unless reasons to justify the loss can be demonstrated.	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	-?	
	6. Conserve/enhance biodiversity and landscape	0	
	7. Promote sustainable journeys	-?	
	8. Provide sufficient infrastructure	0	
	9. Promote healthy, active, cohesive and socially sustainable communities	-?	
	10. Encourage active lifestyles	0	
	<p>Commentary:</p> <p>This option 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 possible 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 all 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</p>		

	<p>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>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</p>	+	<p>Mitigation not required as no negative impacts identified.</p>
	<p>2. To adapt to climate change</p>	+	
<p>3. Protect/enhance built environment</p>	0		
<p>4. Decent, affordable homes</p>	+		
<p>5. Maintain/ support employment base</p>	++		
<p>6. Conserve/enhance biodiversity and landscape</p>	0		
<p>7. Promote sustainable journeys</p>	+		
<p>8. Provide sufficient infrastructure</p>	+		
<p>9. Promote healthy, active, cohesive and socially sustainable communities</p>	0		
<p>10. Encourage active lifestyles</p>	0		
<p>Commentary:</p> <p>Under Option 3, the local plan would adopt a spatial approach to identifying a hierarchy of employment sites, taking locally specific circumstance into consideration to direct economic growth to the most sustainable and appropriate locations within the borough, whilst enabling flexibility (as appropriate) to consider other uses where these would result in wider social, environmental or economic benefits.</p> <p>In doing so, Option 3 would enable the local plan to plan to proactively meet the needs of business (NPPF paragraph 20) whilst setting out a clear economic vision and strategy for the area (paragraph 21). Further, the approach reflects NPPF requirements to identify strategic sites, areas of search and key locations 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 and hierarchy 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. Further, through identifying sites that will act as a clear economic focus (taking into account locally specific requirements and circumstances as identified in the Economic Growth Assessment), the approach enables the council to direct housing to sustainable identified allocations, including the Town Centre as a key focus for housing delivery. This also ensures that the focus of new employment development is located in proximity to the economic hubs of the town, and where housing would not be appropriate given the noise and other environmental constraints.</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 EC3: Manor Royal			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>Option 1: Manor Royal as the first choice location for B use class business, with flexibility for other non B use classes that would complement and support its function as a business district.</p> <p>The policy will draw upon the work undertaken as part of the Manor Royal masterplan and Development Principles Statements that has led to the Manor Royal Design Guide SPD. This will achieve high quality landscaping design for key frontages and gateway sites.</p>		

	<p>Option 1 would protect the business function of Manor Royal, a key economic driver in the Gatwick sub-region. This reflects the evidence based recommendations of the Economic Growth Assessment that Manor Royal should serve as the first choice for B-Class business use. The option enables flexibility for other non B Class economic development where this would positively support the overall function of Manor Royal as a business destination. It will also provide clarity over the key importance of the Business District as a key economic driver and the aspiration of creating an uplift to its function and public realm. This will ensure investor certainty and transparency that the area is vital to the economic function of the town and its role and contribution to the wider sub region. In doing so, the option has been chosen to drive physical and aesthetic improvements to the built environment (SA Objective 3) and maximise the performance of Crawley's economy (SA Objective 5). These, couple with positive impacts against other indicators, mean that option 1 is considered to represent the most sustainable approach.</p>		
<p>Option 1: Manor Royal as the first choice location for B use class business, with flexibility for other non B use classes only when they complement and support its function as a business district.</p> <p>The policy will draw upon the Manor Royal Design Guide SPD to achieve high landscaping design for key frontages and gateway sites.</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. Healthy, active, cohesive and socially sustainable communities 10. Encourage active lifestyles 	<p style="text-align: center;">+? +? ++ 0 ++ 0 + + + +</p>	<p>Mitigation not required as no negative impacts identified.</p>
<p>Commentary</p> <p>Option 1 draws upon the locally specific evidence base of the Economic Growth Assessment which has identified clear demand for a significant amount of B Class employment floorspace in Crawley over the plan period. With only a limited supply of employment land available, the evidence base identifies that Manor Royal should represent the first choice destination for B Class employment uses, and that other employment typologies should only be permitted where it can be demonstrated that proposals would not undermine the business function of the estate. This greater scrutiny of other economic development uses enables the local plan to set out a clear strategic approach to employment, recognising the function of Crawley's Main Employment Areas on a holistic basis. The approach would also provide a policy hook for the Manor Royal Design Guide SPD, which is recognised as a key means of improving the overall Manor Royal environment.</p> <p>Enhancement of Manor Royal as a business location will not necessarily create a net impact on climate change, but through providing a policy hook for the Design Guide SPD there is scope for positive impacts (uncertain) against SA objective 1, with introduction of new green landscaping helping to 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. Flexibility for appropriate Non B Class Use development of a scale that complements and enhances the business function should help to promote economic function (SA objective 5), reduce car journeys (SA objective 7), promote cohesive communities (SA objective 9), and active lifestyles (SA objective 10).</p>			

<p>Option 2: Manor Royal as the first choice location for business but no restrictions on non B Class uses, including retail and leisure, and no design requirements.</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. 0 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 and socially sustainable communities 0 10. Encourage active lifestyles +? 		
<p>Commentary</p> <p>This approach would provide flexibility for a greater range of employment generating uses at Manor Royal, as identified in the NPPF. However, the Economic Growth Assessment has identified a clear demand for a significant amount of B Class employment floorspace in Crawley over the plan period. With only a limited supply of employment land available, the evidence base identifies that Manor Royal should be prioritised as a location for B Class employment uses, and that other employment typologies should only be permitted where it can be demonstrated that proposals would not undermine the business function of the estate. Whilst it is also recognised that national policy requires that both retail and leisure proposals should be directed to town centre and edge-of-centre sites, in this sense there is considered a significant risk that the function of the town centre could be undermined as well as the neighbourhood parades. An open approach to retail within this key economic area, given Crawley's specific local circumstances and its scarcity of land is, therefore, considered inappropriate.</p> <p>Further, an approach that does not link with the Manor Royal SPD, does little to improve the overall environment at Manor Royal, and would not be seen as positively contributing to the overall setting of the business district, in regard to its public realm, aesthetic quality and overall investor confidence in the area as a 21st century business location.</p> <p>For these reasons, it is considered that Crawley is faced with unique circumstances that justify a more managed approach to development at Manor Royal. On this basis, Option 2 is not considered to represent the most sustainable way forward.</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). 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, with no restrictions on non B uses classes including retail and leisure. The policy will draw upon the Manor Royal Design Guide SPD to achieve high landscaping design for key frontages and gateway sites.</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. 0 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 and socially sustainable communities 10. Encourage active lifestyles	0 +?	
<p>Commentary</p> <p>This approach would provide flexibility for a greater range of employment generating uses at Manor Royal, as identified in the NPPF. However, the Economic Growth Assessment has identified a clear demand for a significant amount of B Class employment floorspace in Crawley over the plan period. With only a limited supply of employment land available, the evidence base identifies that Manor Royal should be prioritised as a location for B Class employment uses, and that other employment typologies should only be permitted where it can be demonstrated that proposals would not undermine the business function of the estate. For this reason, it is considered that to allow unrestricted non B Class employment uses across Manor Royal would undermine its business district function, contrary to the evidence set out within the Economic Growth Assessment. Whilst it is recognised that national policy requires that both retail and leisure proposals should be directed to town centre and edge-of-centre sites, there is a risk that the function of the town centre could be undermined as well as the neighbourhood parades. An open approach to retail within this key economic area, given Crawley's specific local circumstances and its scarcity of land is, therefore, considered inappropriate.</p> <p>The approach would provide a policy hook for the Manor Royal Design Guide SPD, which is recognised as a key means of improving the overall Manor Royal environment, in terms of aesthetic appearance, usability, legibility, landscaping, and enhancement of biodiversity. However, without taking a managed approach to manage the economy through policy, there is risk that the overall business function of the estate may be lost.</p> <p>Therefore, it is considered that Crawley is faced with unique circumstances that justify a more managed approach to development at Manor Royal, and Option 3 is not considered to represent the most sustainable way forward.</p> <p>Environmental improvement through the Manor Royal SPD may have a positive (uncertain) impact on climate change minimisation and adaptation, because the economy might not perform well (SA objectives 1 & 2) and also environmental improvements to the built environment (SA objective 3) and the creation new habitat areas (SA objective 6). There is an uncertain effect 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 open space improvements and leisure facilities are brought forward (SA Objective 10).</p>			
Option 4: Do nothing, instead relying on the NPPF. This means no protection of employment sites against alternative uses and for office development to be redirected to the town centre.	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. Healthy, active, cohesive and socially sustainable communities 10. Encourage active lifestyles	-? -? -? - -? -? / -? 0 /	
<p>Commentary</p> <p>Such an approach would be problematic as it fails to have regard to Crawley's</p>			

	<p>particular local circumstances, nor does it reflect the evidence base guidance of the Economic Growth Assessment. The EGA recognises that Manor Royal is, and should continue to serve as Crawley’s premier business destination. To achieve this, the EGA outlines that Manor Royal should be protected for B-Class employment uses, with other uses only allowed where these would support the overall business function of the estate. Further, it is recognised that housing land supply is severely limited in Crawley, and in light of these constraints it is recognised that the town centre represents the most sustainable location for residential development. Without a managed approach to guide employment to the most sustainable locations, there is risk that both Crawley’s economy and ability to provide housing could be negatively impacted. For these reasons, it is considered that B-Class employment uses should be directed to Manor Royal. But an approach of relying solely on the NPPF would not enable these local circumstances to be taken into account, particularly in regards to land scarcity, and as such it is considered that a locally specific policy is both necessary and justified.</p> <p>Further, an approach that does not link with the Manor Royal SPD, does little to improve the overall environment at Manor Royal, and would not be seen as positively contributing to the overall setting of the business district. For these reasons, Option 4 is not considered to represent the most sustainable policy approach.</p> <p>It should also be noted that not restricting uses within Manor Royal and allowing non-business uses would undermine the findings of the EGA that states that Crawley is the economic hub of the sub region, and this would further exacerbate the issues relating to limited land supply and implications for neighbouring authorities, in regard to the unmet economic needs of the town and the economic reliance on in-commuting for their residents.</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>
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Policy EC4: Employment Development and Residential Amenity			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 2: Bring forward a policy that retains the principles of protection to properties adjacent to the Manor Royal Buffer Areas. This includes wording to ensure that protection is in place to manage the relationship in amenity terms between residential (existing and proposed) and adjacent employment proposals. This approach enables the relationship in amenity terms, between residential development and the Main Employment Area, to be appropriately managed through the local plan, thereby promoting sustainable development.		
Option 1: Roll forward the Saved Local Plan policy (for B1 only) which identifies Manor Royal 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 7. Promote sustainable journeys 8. Provide sufficient infrastructure	0 0 + - - 0 0 0 0	

	9. Promote sustainable communities	-	
	10. Encourage active lifestyles	0	
	<p>Commentary</p> <p>This policy option is considered would be too restrictive in regard to B1 uses only being permitted in light of the NPPF and evidence base of the Economic Growth Assessment for the specific Buffer Zone locations. Further, it would leave limited control elsewhere, especially in light of the changes made by central government for commercial to residential permitted development changes.</p> <p>It would be possible to apply the policy to a wider spatial area, mitigating negative impacts against objectives 3 and 9. It is however recognised that within the Buffer Areas, the saved local plan policy is restrictive having regard to the NPPF view on employment, and the council's own Economic Growth Assessment which prioritises a B Class employment focus at Manor Royal. For this reason, an approach that rolls forward the saved local plan policy is likely to result in a negative impact against objective 5.</p>		
Option 2: Bring forward a policy that retains the principles of the Manor Royal Buffer Areas, and includes wording to ensure that protection is in place to manage the relationship in amenity terms between residential (existing and proposed) and adjacent employment proposals.	1. Minimise climate change	0	Mitigation not required as no negative impacts identified.
	2. Adapt to climate change	0	
	3. Protect/enhance built environment	++	
	4. Decent, affordable homes	++	
	5. Maintain/support employment	++	
	6. Conserve/enhance biodiversity and landscape	0	
	7. Promote sustainable journeys	?	
	8. Provide sufficient infrastructure	?	
	9. Promote sustainable communities	+	
	10. Encourage active lifestyles	0	
	<p>Commentary</p> <p>This policy option provides significant positive impacts to the protection and enhancement of the built environment (Objective 3) allowing for consideration to be given to individual proposals on a case-by-case basis and allowing for solutions to be found appropriate to the specific circumstances. Flexibility is provided within the policy wording to protect the amenity of adjacent residential areas whilst maintaining consistency with the NPPF, Economic Growth Assessment, and other Local Plan policies. This builds on the previous Local Plan buffer zones historically identified but allows wider operations dependent on a case-by-case basis rather than just purely B1 uses. Further, the policy affords enables existing buffer zones adjacent to Manor Royal to be retained and new considerations to be given based on the central government changes to permitted development for B1(a) to C3. Such an approach enables the relationship in amenity terms, between residential and main employment area, to be appropriately managed through the local plan, thereby promoting sustainable development.</p> <p>Policy flexibility ensures there is a positive impact against Objectives 4, 5 and 9. Impact against 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.</p>		
Option 3: No policy in the Local Plan and rely on NPPF and general CH3 amenity policy only.	1. Minimise climate change	0	
	2. Adapt to climate change	0	
	3. Protect/enhance built environment	-?	
	4. Decent, affordable homes	0	
	5. Maintain/support employment	?	
	6. Conserve/enhance biodiversity and landscape	0	
	7. Promote sustainable journeys	0	
	8. Provide sufficient infrastructure	?	
	9. Promote sustainable communities	-?	
	10. Encourage active lifestyles	0	

	<p>Commentary</p> <p>An approach relying on the NPPF and Policy CH3 fails to acknowledge the close proximity of Manor Royal to residential locations. There are a number of existing residential properties situated close to Manor Royal, and the buffer zones provide an important opportunity to manage the transition between the two areas. Further, this option would not provide certainty to prevent the inappropriate introduction of residential uses into employment areas. Therefore, it is considered that the option would not provide the certainty required to ensure that positive impacts on the Sustainability Objectives could be achieved.</p>
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Policy EC5: Town Centre Uses

Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>Option 4: Increased Primary Frontage Flexibility, Fully Flexible Secondary Frontage.</p> <p>Option 4 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. This is because it is considered that a percentage based approach to managing town centre uses is no longer justified in NPPF terms, as it would not be seen as sufficiently flexible to support the full range of uses identified in the NPPF as being appropriate for healthy town centres. A percentage based approach would therefore be viewed as too restrictive, and would not pro-actively promote sustainable economic development. Further, amendments to town centre permitted development rights means that a percentage based approach cannot realistically be managed, and would be contrary to the Government approach. Therefore, Option 4 is considered to represent the most sustainable policy approach.</p>		
Option 1: Limited Primary Frontage Flexibility.	<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. Healthy, active, cohesive and socially sustainable communities 10. Encourage active lifestyles 	<p>0</p> <p>0</p> <p>+?</p> <p>+</p> <p>-</p> <p>0</p> <p>+</p> <p>+</p> <p>+</p> <p>+?</p>	
<p>Commentary</p> <p>This approach would involve direct translation of the current three-tiered Town Centre Wide Supplementary Planning Document approach into 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</p>			

	<p>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>Though the approach would enable retention of a strong retail core, it is considered to have a negative impact against Objective 5, in that an overly prescriptive approach is likely to be restrictive in promoting a full range of main town centre uses.</p> <p>Amendments to the permitted development rights make it difficult to enforce this option, making it unrealistic to proceed.</p>		
<p>Option 2: Limited Percentage Based Primary Frontage, Fully Flexible Secondary Frontage.</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. Healthy, active, cohesive and socially sustainable communities 10. Encourage active lifestyles 	<p style="text-align: center;">0 0 +? + - 0 + + + +?</p>	
	<p>Commentary</p> <p>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), some 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. For secondary frontages, 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. Further, changes to Permitted Development rights in Town Centre mean that a percentage based approach to managing frontages can no longer realistically be enforced. Such an approach 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>Though the approach would enable retention of a strong retail core, whilst offering greater flexibility in secondary frontages, this option is considered to have a negative impact against Objective 5 in taking an overly prescriptive approach in the Primary Shopping Area that is likely to be restrictive in promoting a full range of main town centre uses. Amendments to the permitted development rights make it difficult to enforce this option, making it unrealistic to proceed.</p>		
<p>Option 3: Greater Primary Frontage Flexibility, Fully Flexible Secondary Frontage.</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 	<p style="text-align: center;">0 0 +? + -? 0</p>	

	<p>7. Reduce car journeys</p> <p>8. Ensure the provision of sufficient infrastructure</p> <p>9. Healthy, active, cohesive and socially sustainable communities</p> <p>10. Encourage active lifestyles</p>	<p>+</p> <p>+</p> <p>+</p> <p>+?</p>	
<p>Commentary</p> <p>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 Option 2 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. For secondary frontages, 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 policy approach based on primary and secondary frontages, whilst enabling flexibility for a retail-led mix of uses in primary frontages, broadly reflects the objectives of the NPPF. However, changes to Permitted Development rights in Town Centre mean that a percentage based approach to managing frontages can no longer realistically be enforced. Such an approach would not fit with the overarching objectives of the NPPF, and Option 3 is not considered to represent the most sustainable policy approach.</p>			
<p>Option 4: Increased Primary Frontage Flexibility, Fully Flexible Secondary Frontage.</p>	<p>1. To minimise climate change</p> <p>2. To adapt to climate change</p> <p>3. Protect/enhance built environment</p> <p>4. Ensure everyone has the opportunity to live in a decent and 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. Healthy, active, cohesive and socially sustainable communities</p> <p>10. Encourage active lifestyles</p>	<p>0</p> <p>0</p> <p>+?</p> <p>+</p> <p>++</p> <p>0</p> <p>++</p> <p>+</p> <p>++</p> <p>+</p>	<p>Mitigation not required as no negative impacts identified.</p>
<p>Commentary</p> <p>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 all proposals within use classes A1-A5 (inclusive). For all frontages, proposals for other main town centre uses will be considered on their individual merits, having regard to their impact on the overall vitality and viability of the town centre.</p> <p>Although there is risk that in implementing a highly flexible policy approach, Option 4 removes the Local Planning Authority's ability to manage changes of use. However, it is recognised that the NPPF requires flexibility for businesses. This, coupled with amendments to town centre permitted development rights mean that a percentage based approach is overly restrictive and cannot be realistically managed. Therefore, Option 4 is considered to represent the most economically sustainable and pro-active way forward, and is considered to represent the preferred option.</p>			

Policy EC6: Town Centre and Edge-of-Centre Development Sites			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<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> <p>The chosen policy approach (Option 3) identifies and allocates a number of sustainable town centre and edge-of-centre sites for mixed-use development. This approach provides greater certainty and status to sites through the formal allocation process, more accurately reflecting the need to identify sites for main town centre uses, as identified under NPPF paragraph 23.</p>		
Option 1: Maintain the existing approach to roll forward Core Strategy allocations, with other sites maintained as unallocated 'opportunity sites'.	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	0		
7. Reduce car journeys	++		
8. Ensure the provision of sufficient infrastructure	+		
9. Healthy, active, cohesive and socially sustainable communities	+		
10. Encourage active lifestyles	+		
<p>Commentary</p> <p>An approach rolling forward existing Core Strategy allocations, supported by the 'opportunity areas' identified in the Town Centre Wide SPD, 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). It also 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 would not however fully reflect NPPF paragraph 23 in that only some sites would be allocated, with the remaining sites identified only as 'opportunity areas'. Given the constrained nature of Crawley's boundary and limited available land supply, positive planning through allocations is needed to direct development to the sustainable town centre location. As such, it is not considered to represent the most sustainable approach.</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.	1. To minimise climate change	+	Mitigation not required as no negative impacts identified.
	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	0	
	7. Reduce car journeys	++	
	8. Ensure the provision of sufficient infrastructure	+	
	9. Healthy, active, cohesive and socially sustainable communities	++	

	10. Encourage active lifestyles	+	
	<p>Commentary</p> <p>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 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 to maximise the scope for delivery, and therefore, Option 2 is not considered to represent the most sustainable way forward.</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>	<p>1. To minimise climate change</p> <p>2. To adapt to climate change</p> <p>3. Protect/enhance built environment</p> <p>4. Ensure everyone has the opportunity to live in a decent and 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. Healthy, active, cohesive and socially sustainable communities</p> <p>10. Encourage active lifestyles</p>	<p>+</p> <p>+</p> <p>+</p> <p>++</p> <p>++</p> <p>0</p> <p>++</p> <p>+</p> <p>++</p> <p>+</p>	<p>Mitigation not required as no negative impacts identified</p>
	<p>Commentary</p> <p>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</p>		

	more sustainable policy approach than Options 1 and 2.
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Policy EC7: Retail and Leisure Development outside the Primary Shopping Area

Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>Option 2: Develop a local plan policy to support the town centre first approach and interpretation of NPPF retail policy at the local level.</p> <p>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 to take into account locally specific issues. In particular, a locally specific policy enables acknowledgement to be made within the policy to the function of existing out-of-centre retail locations as a focus for retail, subject to sequential and impact testing. This enables the town centre first approach to be interpreted through policy at the local level, and Option 2 is therefore considered to represent the most sustainable approach.</p>		
Option 1: Rely on the NPPF to promote the town centre first approach.	<ul 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. Healthy, active, cohesive and socially sustainable communities 10. Encourage active lifestyles 	<ul style="list-style-type: none"> + + + 0 ++ 0 + + + 0 	Mitigation not required as no negative impacts identified
	<p>Commentary</p> <p>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. 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>		
Option 2: Develop a local plan policy to support the town centre first approach and interpretation of NPPF retail policy at the local level.	<ul 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 	<ul style="list-style-type: none"> ++ + ++ 0 ++ 0 	Mitigation not required as no negative impacts identified

	biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities 10. Encourage active lifestyles	++ + + 0	
<p>Commentary</p> <p>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>This enables the policy to identify existing out-of-centre locations as the focus for out-of-centre retail proposals, subject to proposals demonstrating that the sequential and impact tests are satisfied. As such, it supports the promotion of a vital and viable town centre, whilst enabling the development of identified edge-of-centre locations, and at out-of-centre locations, only where it can be demonstrated that proposals would not impact on the vitality and viability of the town centre as existing or planned. Through this approach, there is consistency with the other employment policies set out within the Local Plan, including the Policy EC3 focus on promoting business-led growth at Manor Royal.</p> <p>In directing retail development to a sustainable town centre location, before considering locations beyond the town centre, Option 2 actively promotes the principles of sustainable development, particularly in terms of reducing car journeys, promoting healthy active communities, and minimising climate change. For these reasons, Option 2 is considered to represent the most sustainable policy approach.</p>			

Policy EC8: Neighbourhood Centres			
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>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>		
Option 1: Low Flexibility: A percentage based approach to determine the proportion of non-retail uses permitted in neighbourhood parades.	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, landscape, flora/fauna. 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable	- - ? ? -? 0 - - -	

	communities 10. Encourage active lifestyles	0	
	<p>Commentary</p> <p>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 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 vitality and viability of the parade. By inflexibly restricting the number of non-retail uses, there is also 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. For this reason, Option 1 is not considered to represent the most sustainable policy approach.</p> <p>By prescriptively setting out acceptable uses at neighbourhood parades there is risk that Option 1 reduces choice and therefore increases the need to travel, impacting negatively against Objectives 1, 2, 5, 7, 8, and 9. Local Plan policies SD1, ENV6, 7, 9, and 10 may help mitigate against some negative impacts. However, an approach that potentially harms the parades would be difficult to mitigate against in full.</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.	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, landscape, flora/fauna. 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities 10. Encourage active lifestyles	+ + + ? + 0 + + + 0	Mitigation not required as no negative impacts identified.
	<p>Commentary</p> <p>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. The approach would seek to support proposals for change of use, provided that these would not adversely affect the ability of the parade to cater for the day-to-day needs of residents, and would enhance the vitality and viability of the parade.</p> <p>It is considered that this approach has historically worked well in Crawley in providing flexibility for a range of uses whilst enabling officers to draw upon professional expertise to manage an overall balance of uses and ensure that the parade continues to meet the day-to-day needs of residents. By continuing to allow for a range of uses in an accessible locations, it is considered that the Option 2 approach represents a sustainable and pragmatic means of determining applications for neighbourhood parade change of use.</p>		
Option 3: High Flexibility: Implement a highly flexible approach	1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built	- - ?	

with minimal policy restriction.	environment		
	4. Ensure everyone has the opportunity to live in a decent and affordable home.	?	
	5. Maintain/ support employment base	-?	
	6. Conserve/enhance biodiversity, landscape, flora/fauna.	0	
	7. Reduce car journeys	-	
	8. Ensure the provision of sufficient infrastructure	-	
	9. Healthy, active, cohesive and socially sustainable communities	-	
	10. Encourage active lifestyles	0	
<p>Commentary</p> <p>This option would take a highly flexible approach, not placing any restriction on the proportion of non-retail uses locating in neighbourhood centres. There is significant risk that option affords too great a level of flexibility, and in failing to refer to provide policy guidance to facilitate the vitality and viability of the parade, there is risk that 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>There is risk that Option 3 is overly flexible, in that an unmanaged approach to the parades could erode the vitality and viability of their function over time. Though Local Plan sustainability policies SD1, ENV6, 7, 9, and 10 may help mitigate against some negative impacts, an approach that potentially harms the parades is difficult to mitigate against in full.</p>			

Policy EC9: Rural Economy			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>Option 1: Promote the rural economy where it is in keeping with the landscape character of its location and requiring goods to be primarily produced on the holding or neighbouring holdings.</p> <p>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.</p>		
Option 1: Promote the rural economy where it is 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	+	Negative impact against Objective 5 may potentially be mitigated through locating rural economic development as close to residential areas as is practicable.
	2. To adapt to climate change	0	
	3. Protect/ enhance built environment	+	
	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 and socially sustainable communities	+	
	10. Encourage active lifestyles	0	
<p>Commentary</p> <p>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: Encourage the	1. To minimise climate change	-	

rural economy, regardless of landscape character and use.	2. To adapt to climate change	-	
	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 and socially sustainable communities	0	
	10. Encourage active lifestyles	0	
	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.		

Housing

Policy H1: Housing Provision			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>Option 5: 'Supply-led' locally determined housing requirement (minimum of 326 dwellings p.a. over period 2015-2030).</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 significantly above these levels could not be sustained over the Plan period to 2030, as informed by the council's urban capacity, open space, economic growth and transport modelling work.</p> <p>Mitigation of negative impact on SA Objective 4 (Opportunity to live in a decent and affordable home) is required. This is expected to be achieved through effective Duty to Cooperate working across the Housing Market Area and with ongoing wider partnership workings to ensure the delivery of sufficient housing in the mid to longer term where this is in accordance with other sustainable planning policies.</p>		
<p>Option 1: Demographic-led locally determined housing requirement (542 dwellings p.a.) These figures to be revised with 2011 Census Data and updated DCLG household projections.</p>	<ol style="list-style-type: none"> 1. To minimise climate change 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 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities 10. Encourage active lifestyles 	<p>0</p> <p>-</p> <p>--</p> <p>+</p> <p>-</p> <p>--</p> <p>-</p> <p>0</p> <p>?</p> <p>--</p>	
	<p>Commentary</p> <p>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 were ruled out on the basis that they are not specifically related to overall levels of housing provision.</p> <p>Development at this level is considered would have a significant negative impact on Criteria 10, as it would require substantial loss of open space sites identified through Local Plan evidence as being critical in their function for the town and encouraging healthy lifestyles, in terms of their quantity, quality and accessibility to the borough's residents, employees and visitors. Pressures would also be placed on the existing formal health infrastructure providers, which in some neighbourhoods are already performing at, over, or close to, capacity.</p>		
<p>Option 2: Economy-led locally determined housing requirement (350 dwellings p.a.) (assumes hybrid economic growth and</p>	<ol style="list-style-type: none"> 1. To minimise climate change 2. To adapt to climate change, i.e. reduction of flood risk, water resource management 3. Protect/enhance built environment 	<p>0</p> <p>?</p> <p>-</p>	

job growth of 200 per annum, post 2016). These figures to be revised with outputs of revised EGA 2014.	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	-	
	8. Ensure the provision of sufficient infrastructure	0	
	9. Healthy, active, cohesive and socially sustainable communities	?	
	10. Encourage active lifestyles	--	
<p>Commentary</p> <p>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 were ruled out on the basis that they are not specifically related to overall levels of housing provision.</p> <p>Development at this level is considered would have a significant negative impact on Criteria 10, as it would require substantial loss of open space sites identified through Local Plan evidence as being critical in their function for the town and encouraging healthy lifestyles, in terms of their quantity, quality and accessibility to the borough's residents, employees and visitors. Pressures would also be placed on the existing formal health infrastructure providers, which in some neighbourhoods are already performing at, over, or close to, capacity.</p>			
Option 3: Affordable housing needs locally determined housing requirement (minimum of 510 dwellings per annum). These figures to be revised with data from updated SHMA.	1. To minimise climate change	0	
	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	--	
	8. Ensure the provision of sufficient infrastructure	0	
	9. Healthy, active, cohesive and socially sustainable communities	?	
	10. Encourage active lifestyles	--	
<p>Commentary</p> <p>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. SA objectives 1 and 8 were ruled out on the basis that they are not specifically related to overall levels of housing provision.</p>			

	Development at this level is considered would have a significant negative impact on Criteria 10, as it would require substantial loss of open space sites identified through Local Plan evidence as being critical in their function for the town and encouraging healthy lifestyles, in terms of their quantity, quality and accessibility to the borough's residents, employees and visitors. Pressures would also be placed on the existing formal health infrastructure providers, which in some neighbourhoods are already performing at, over, or close to, capacity.		
Option 4: Continuation of South East Plan requirement over plan period (375 dwellings p.a.)	1. To minimise climate change 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 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities 10. Encourage active lifestyles	0 - -- - +? -- -- 0 ? -?	
	<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 were ruled out on the basis that they are not specifically related to overall levels of housing provision.</p> <p>Development at this level is considered would have a possible negative impact on Criteria 10, as it may require loss of open space sites identified through Local Plan evidence as being critical in their function for the town and encouraging healthy lifestyles, in terms of their quantity, quality and accessibility to the borough's residents, employees and visitors. Pressures would also be placed on the existing formal health infrastructure providers, which in some neighbourhoods are already performing at, over, or close to, capacity.</p>		
Option 5: 'Supply-led' locally determined housing requirement (minimum of 334 dwellings p.a. over period 2015-2030).	1. To minimise climate change 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 8. Ensure the provision of	0 + + - + + + 0	Mitigation of negative impact on SA 4 (Opportunity to live in a decent and affordable home) would be required. This is expected to be achieved through effective Duty to Cooperate working across the Housing Market Area and with ongoing wider partnership workings to ensure the delivery of sufficient housing in the mid to longer term where this is in accordance with other sustainable planning policies.

	<p>sufficient infrastructure</p> <p>9. Healthy, active, cohesive and socially sustainable communities</p> <p>10. Encourage active lifestyles</p>	<p>+</p> <p>0</p>	
<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 and transport modelling 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>			

Policy H2: Key Housing Sites			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>Option 2: Identify specific 'deliverable' and 'developable' housing sites to meet Crawley's housing requirements over the Plan period (2015-2030).</p> <p>A policy which identifies a series of deliverable and developable housing sites and broad locations 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 2030. 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 'deliverable' sites to provide 5 years worth of housing and specific 'developable' housing sites or broad locations for growth, for years 6-10, should also be identified and where possible, for years 11-15.</p>		
Option 1: Not identifying a series of deliverable and developable housing sites to meet Crawley's housing needs.	<p>1. To minimise climate change</p> <p>2. To adapt to climate change, i.e. reduction of flood risk, water resource management</p> <p>3. Protect/enhance built environment</p> <p>4. Everyone has opportunity to live in a decent and affordable home</p> <p>5. Maintain/ support employment base</p> <p>6. Conserve/ enhance biodiversity habitats</p> <p>7. Reduce car journeys, sufficient transport infrastructure</p> <p>8. Provision of sufficient infrastructure to meet the requirements of the borough.</p> <p>9. Healthy, active, cohesive and socially sustainable communities</p> <p>10. Encourage active lifestyles</p>	<p>0</p> <p>-</p> <p>-</p> <p>?</p> <p>0</p> <p>-</p> <p>-</p> <p>-</p> <p>-</p> <p>0</p>	
<p>Commentary</p> <p>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, 5, and 10 were ruled out on the basis that they are not specifically</p>			

	related to the location of future housing development.		
Option 2: Identify specific 'deliverable' and 'developable' housing sites to meet Crawley's housing requirements over the Plan period (2015-2030).	1. To minimise climate change	0	Mitigation not required as no negative impacts identified. The Open Space Assessment, and correlating Local Plan allocation requirements for mitigation, ensures that the housing allocations on open space sites will not result in a negative impact on healthy, active lifestyles through access to good quality outdoor sport and play space.
	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	0	
	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. Healthy, active, cohesive and socially sustainable communities	+	
	10. Encourage active lifestyles	/	
	<p>Commentary</p> <p>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 and 5 were ruled out on the basis that they are not specifically related to the location of future housing development.</p> <p>Development sites identified for allocation include some existing open space sites, however, these have been allocated for housing and open space and include requirements for improvements to the remaining open space and outdoor recreation facilities this will ensure there is a neutral impact.</p>		

Policy H3: Future Housing Mix			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>Option 1: To provide an appropriate mix of dwelling types and sizes to address local housing needs.</p> <p>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.</p>		
Option 1: To provide an appropriate mix of dwelling types and sizes to address local housing needs.	1. To minimise climate change	0	Mitigation not required as no negative impacts identified.
	2. To adapt to climate change, i.e. reduction of flood risk, water resource management	0	
	3. Protect/enhance built environment	0	
	4. Everyone has the opportunity to live in a decent and affordable home	+	
	5. Maintain/ support employment base	0	
	6. Conserve/ enhance biodiversity habitats	0	

	7. Reduce car journeys, sufficient transport infrastructure	0	
	8. Provision of sufficient infrastructure to meet the requirements of the borough.	0	
	9. Healthy, active, cohesive and socially sustainable communities	+	
	10. Encourage active lifestyles	0	
	<p>Commentary</p> <p>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.	1. To minimise climate change	0	
	2. To adapt to climate change, i.e. reduction of flood risk, water resource management	0	
	3. Protect/enhance built environment	0	
	4. Everyone has opportunity to live in a decent and affordable home	--	
	5. Maintain/ support employment base	0	
	6. Conserve/ enhance biodiversity habitats	0	
	7. Reduce car journeys, sufficient transport infrastructure	0	
	8. Provision of sufficient infrastructure to meet the requirements of the borough.	0	
	9. Healthy, active, cohesive and socially sustainable communities	--	
	10. Encourage active lifestyles	0	
	<p>Commentary</p> <p>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 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.</p>		

Policy H4: Affordable and Low Cost Housing			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>Option 5: 40%, no threshold and no sliding scale. Low Cost where viability allows above 15 dwellings.</p> <p>This option is considered to offer the greatest level of affordable housing in light of the high pressures for such provision in the town and in light of the supply-led approach to housing delivery. It is justified by evidence in both the SHMA and the Viability Assessment. It is the most sustainable option as it delivers housing opportunities to the members of the town's population most in need of support and who would find it more difficult to access housing within the wider Housing Market Area and still access the job</p>		

	opportunities (particularly in the lower-skilled sectors) available in Crawley. Retaining an element of low cost housing, where viability allows, provides some opportunity for wider members of the population to access housing for private purchase.		
Option 1: 40%; 15 dwellings Threshold	<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 	<p style="text-align: center;">0 0 0 + 0 0 0 0 + 0</p>	
	<p>Commentary</p> <p>Objectives 4 and 9 are considered the most relevant of the sustainability objectives with regards to this policy area.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>		
Option 2: 40%; No Threshold; Sliding scale.	<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 	<p style="text-align: center;">0 0 0 ++ 0 0 0 0 ++ 0</p>	Mitigation not required as no negative impacts identified.
	<p>Commentary</p> <p>As with Option 1, however, the sliding scale option would increase the affordable housing provision to apply to all new residential developments.</p>		
Option 3: 30% + 10% Low Cost; 15 dwellings	<ol style="list-style-type: none"> 1. Minimise climate change 2. Adapt to climate change 	<p style="text-align: center;">0 0</p>	

Threshold.	3. Protect/enhance built environment	0	
	4. Decent, affordable homes	+	
	5. Maintain/support employment	0	
	6. Conserve/enhance biodiversity and landscape	0	
	7. Promote sustainable journeys	0	
	8. Provide sufficient infrastructure	0	
	9. Promote sustainable communities	++	
	10. Encourage active lifestyles	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%; No Threshold; Sliding scale.	1. Minimise climate change	0	
	2. Adapt to climate change	0	
	3. Protect/enhance built environment	0	
	4. Decent, affordable homes	++	
	5. Maintain/support employment	0	
	6. Conserve/enhance biodiversity and landscape	0	
	7. Promote sustainable journeys	0	
	8. Provide sufficient infrastructure	0	
	9. Promote sustainable communities	++	
	10. Encourage active lifestyles	0	
Commentary			
As with Option 3, however, the sliding scale option would increase the affordable housing provision to apply to all new residential developments.			
Option 5: 40%; No Threshold; No sliding scale. Low cost where viability allows	1. Minimise climate change	0	
	2. Adapt to climate change	0	
	3. Protect/enhance built environment	0	
	4. Decent, affordable homes	++	
	5. Maintain/support employment	0	
	6. Conserve/enhance biodiversity and landscape	0	
	7. Promote sustainable journeys	0	
	8. Provide sufficient infrastructure	0	
	9. Promote sustainable communities	++	
	10. Encourage active lifestyles	0	
Commentary			
As with Option 1, however, based on viability evidence the percentage applies to all new residential developments equally. This increases the likely provision of affordable housing in perpetuity to a greater extent than Option 4. The continued inclusion of a requirement for low cost housing where viability allows ensures a different offer may still be available to support the first time buyer market, and reduce dependency on social housing.			

Option 6: 30% + 10%; No Threshold; No sliding scale.	1. Minimise climate change	0	
	2. Adapt to climate change	0	
	3. Protect/enhance built environment	0	
	4. Decent, affordable homes	++	
	5. Maintain/support employment	0	
	6. Conserve/enhance biodiversity and landscape	0	
	7. Promote sustainable journeys	0	
	8. Provide sufficient infrastructure	0	
	9. Promote sustainable communities	++	
	10. Encourage active lifestyles	0	
	Commentary		
<p>As with Option 3, however, based on viability evidence the percentage applies to all new residential developments equally.</p> <p>By delivering a lower percentage residential developments will provide less 'affordable housing' in perpetuity. However, this is considered to be off-set by the 10% low cost which, whilst not affordable housing in perpetuity, does ensure a different offer is made available to support the first-time buyer market, and would help reduce future dependency on social housing.</p> <p>Delivering a mix of tenure types through the policy allows for increased viability of developments throughout the economic cycle and is justified by evidence in both the SHMA and the Viability Assessment. It is the most sustainable option as it delivers a broader range of housing opportunities to the widest range of the population.</p> <p>Having a lower level of affordable housing being provided within developments, a greater proportion of the dwellings built will be subject to CIL charges. This will increase the abilities to provide sufficient infrastructure within the borough to support the developments and ensure a reduced negative impact on existing communities.</p> <p>As the policy includes the opportunity for flexibility based on viability evidence on a site-by-site basis, the option would not have a negative impact on the economic growth.</p>			

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>Option 1: Criteria based policies specific to Gypsies, Travellers and Travelling Showpeople (GTTS) 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 the local environment/ amenity of residents (i.e. the suitability of specific employment uses in residential areas). In addition, a site would be designated for pitch provision to meet potential future accommodation needs of Gypsies and Travellers.</p> <p>Option 1 was chosen because it will meet potential future accommodation needs of the Gypsy and Traveller population, and would have a limited negative environmental impact on Crawley as a whole when compared to the other options.</p>		
Option 1: Criteria based policies specific to Gypsies, Travellers and Travelling Showpeople (GTTS) 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	1. Minimise climate change 2. Adapt to climate change 3. Built environment 4. Affordable homes 5. Maintain/support employment 6. Conserve and enhance biodiversity habitats 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote healthy active	0 0 ? + 0 - 0 0 ?	Mitigation is required for SA Objective 6 as the allocation could have a negative effect on biodiversity/habitats. However, Policy H5 of the Local Plan does have wording to demonstrate that mitigation measures will be used to protect the allocation site from any potential environmental harm.

<p>decibels for temporary sites) and protecting the local environment/amenity of residents (i.e. the suitability of specific employment uses in residential areas). In addition, a site would be designated for pitch provision to meet the full accommodation needs of Gypsies and Travellers.</p>	<p>cohesive sustainable communities 10. Encourage active lifestyles</p>	<p>0</p>	<p>Commentary SA objectives 1, 2, and 5 have been assessed as having a neutral impact owing to the small scale of the need/land take. However, individual site options have been assessed against these Sustainability Appraisal objectives on a smaller scale. 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. However, individual site options have also been assessed against these Sustainability Appraisal objectives on a smaller scale. The inclusion of caravan accommodation within the existing structure of the borough is likely to look different but not necessarily damaging to the built environment if mitigated appropriately through the Development Control process. The provision of pitches to meet the full accommodation needs of the GTTS community would provide a small number of affordable dwellings to meet a particular need. The impact of the site proposed also is likely to impact upon the biodiversity of the borough, namely the High Weald Area of Outstanding Natural Beauty (AONB), although this would be mitigated via the policy wording. Infrastructure requirements in terms of education and health would be limited, since the on-site GTTS community would be relatively small. However, the provision of pitches may result in the effective identification of a traveller community partially integrated into the settled community with uncertain effects on community cohesion.</p>
<p>Option 2: Criteria based policies specific to Gypsies, Travellers and Travelling Showpeople (GTTS) through 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) but relying solely on other general design and amenity policies within the Local Plan In addition, a site would be designated for pitch provision to meet the full accommodation needs of Gypsies and Travellers.</p>	<p>1. Minimise climate change 2. Adapt to climate change 3. Built environment 4. Affordable homes 5. Maintain/support employment 6. Conserve and enhance biodiversity habitats 7. Promote sustainable journeys 8 Provide sufficient infrastructure 9. Promote healthy active cohesive sustainable communities 10. Encourage active lifestyles</p>	<p>0 0 - + 0 - 0 0 ? 0</p>	<p>Commentary SA objectives 1 2, and 5 have been assessed as having a neutral impact owing to the small scale of the need/land take. However, individual site options have been assessed against these Sustainability Appraisal objectives on a smaller scale. 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. However, individual site options have also been assessed against these Sustainability Appraisal objectives on a smaller scale. 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. However, for this option, the reliance upon other more general policies within the Local Plan in relation to the character would mean that the Local Planning Authority would have less control over the design of potential site provision. The provision of pitches to meet the full accommodation needs of the GTTS community would provide a small number of affordable dwellings to meet a particular need. The impact of 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>
<p>Option 3: Criteria based policies specific to Gypsies, Travellers and Travelling Showpeople (GTTS) through limiting exposure to noise (57</p>	<p>1. minimise climate change 2. adapt to climate change 3. Built environment 4. Affordable homes 5. Maintain/support employment 6. Conserve and enhance</p>	<p>0 0 - - 0 -</p>	

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). However, no sites would be designated for Gypsy and Traveller provision within the borough.	biodiversity habitats		
	7. promote sustainable journeys	0	
	8 Provide sufficient infrastructure	0	
	9. Promote healthy active cohesive sustainable communities	?	
	10. encourage active lifestyles	0	
<p>Commentary</p> <p>SA objectives 1, 5 and 8 have been assessed as having a neutral impact because of the small scale of the need/land take.</p> <p>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 not providing a site would reduce the provision of affordable homes to meet a particular need. 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>			

Policy H6: Houses in Multiple Occupation			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option:	<p>Option 2: To restrict HMOs by criteria based on appropriate location, design and layout, impact on neighbouring amenity and privacy.</p> <p>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.</p>		
Option 1: No restriction on HMO's in terms of layout and design, impact on neighbouring amenity.	1. Minimise climate change	0	
	2. Adapt to climate change	0	
	3. Built environment	0	
	4. Everyone has opportunity to live in a decent and affordable home	--	
	5. Maintain/support employment	0	
	6. Conserve and enhance biodiversity habitats	0	
	7. Promote sustainable journeys	0	
	8 Provide sufficient infrastructure	0	
	9. Promotion of Healthy, Active, Cohesive and Mixed Communities	--	
	10. Encourage active lifestyles	0	
<p>Commentary</p> <p>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.</p>			

<p>Option 2: To restrict HMOs by criteria based on appropriate location, design and layout, impact on neighbouring amenity and privacy.</p>	<p>1. Minimise climate change 2. Adapt to climate change 3. Built environment 4. Everyone has opportunity to live in a decent and affordable home 5. Maintain/support employment 6. Conserve and enhance biodiversity habitats 7. Promote sustainable journeys 8 Provide sufficient infrastructure 9. Promotion of Healthy, Active, Cohesive and Mixed Communities 10. Encourage active lifestyles</p>	<p>0 0 0 + 0 0 0 0 + 0</p>	<p>Mitigation not required as no negative impacts identified.</p>
<p>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.</p>			
<p>Option 3: Restricting HMOs by location/ concentration?</p>	<p>1. Minimise climate change 2. Adapt to climate change 3. Built environment 4. Everyone has opportunity to live in a decent and affordable home 5. Maintain/support employment 6. Conserve and enhance biodiversity habitats 7. Promote sustainable journeys 8 Provide sufficient infrastructure 9. Promotion of Healthy, Active, Cohesive and Mixed Communities 10. Encourage active lifestyles</p>	<p>0 0 0 ? 0 0 0 0 ? 0</p>	
<p>Commentary New HMO's are monitored by location and concentration. Consideration may need to be given to the need to introduce Article 4 Directions in certain locations removing Permitted Development Rights for the conversion of dwellings to small HMO's in areas where there is a high risk of concentrations of HMO's.</p>			

Environment

Policy ENV1: Green Infrastructure			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 1: Identify a green infrastructure network and opportunities for enhancement. Option 1 is the most suitable as it has the most positive effect of the sustainability objectives.		
Option 1: Identify a green infrastructure network and opportunities for enhancement.	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 + + ++	Mitigation not required as no negative impacts identified.
	Commentary This option provides a way 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.		
Option 2: Do not identify a green infrastructure network and do not identify green infrastructure to support development.	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 - - -	
	Commentary Without identifying Crawley's valued green infrastructure and requiring impacts upon it to be mitigated or compensated for would gradually lead to a more fragmented network of green infrastructure which is unable to respond to climate change and growth of the town.		

Policy ENV2: Biodiversity			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 1: To ensure a net gain in biodiversity. 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	+ + + /	Mitigation not required as no negative impacts identified.

	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 + + +	
	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 8. Provide sufficient infrastructure 9. Promote sustainable communities 10. Encourage active lifestyles	+? +? / / / +? 0 - ? -	
	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 ENV3: Local Green Space			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 1: Designate areas of particular importance to a local community. Option 1 is preferred as those sites designated are of great importance to the wellbeing of the surrounding community		
Option 1: Designate areas of particular importance to a local community	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 ++ ++ ++	Mitigation not required as no negative impacts identified.
	Commentary This option provides significant benefit to the health and wellbeing of the local community.		
Option 2: Do not designate areas of particular importance to the local community.	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 The specific site is already locally designated as an SNCI but policy currently protects the overall biodiversity value with mitigation or compensation off-site a possibility. This would be a negative consequence for local residents who value the proximity and multifunctional nature of the local green space.		

Policy ENV4: Open Space, Sport and Recreation			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 1: Use our open space assessment to determine the needs and opportunities for sport as well as surplus areas for alternative uses. Outside Local Plan Allocations open space will be protected unless proven to be surplus. Option 1 is chosen as it makes the best use of open space to meet Local Plan objectives		
Option 1: Use our open space assessment to determine the needs and opportunities for sport as well as surplus areas for alternative uses. Outside Local Plan Allocations open space will be protected unless proven to be surplus.	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 +? +? +? + +	Mitigation not required as no negative impacts identified.
	Commentary This option puts the onus on developers to justify loss of any open space outside that already identified as part of the Local Plan. The council's Open Space Study (2013) provides standards and areas of deficit/sufficient supply of open space by which proposals should consider if demonstrating that a site is surplus. The study allows the council to ensure the best use of land to balance Local Plan objectives		
Option 2: Protect all open space unless proposals clearly show the site to be surplus.	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 + + +	
	Commentary This option puts the onus on developers to justify any loss of any open space. This could lead to protection of open space that would be better suited to an alternative type of open space or type of development.		

Policy ENV5: Provision of Open Space and Recreational Facilities			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 1: Requires that impacts of an increased population on open space are mitigated/compensated for through CIL or onsite provision. Option 1 is most suitable as it aims to provide infrastructure to support the growth of		

	the town.		
Option 1: Requires that impacts of an increased population on open space are mitigated/compensated for through CIL or onsite provision.	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 ++ ++ ++	May restrict the number of houses built.
	Commentary This option aims to provide new open space where possible and enhance existing open space to mitigate the impact of an increasing population.		
Option 2: Not to charge CIL or seek open space as part of development where appropriate.	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 -- - -	
	Commentary Over time the impact of an increased population but no additional open space will place greater pressure on existing spaces and facilities. The quality of these spaces will be negatively affected and the consequence could be a decline in the health and well-being of Crawley residents.		

Policy ENV6: Sustainable Design and Construction			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 3: policy requiring CfSH Level 3 & BREEAM excellent, and the development to achieve a set of objectives that development should achieve to successfully contribute towards mitigating climate change. Option 3 is most suitable as it provides a flexible approach for developments to positively work against climate change.		
Option 1: Do not include a policy relating to development & climate change.	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</p> <p>The NPPF requires us to actively plan for a sustainable future. By not including a policy aimed to bring about a reduction in energy consumption and addressing climate change issues through the effective design & construction processes the plan would not be NPPF compliant. Further to this the planning system is ideally placed to bring about a step change in the approach to energy consumption through better use of design, therefore by using this option the Local Plan would be missing an ideal opportunity to contribute towards local and national carbon emission targets.</p>		
Option 2: Utilise a carbon offset fund and a carbon reduction target and detail how developers should achieve this target. This would allow developers to offset residual emissions offsite.	1. Minimise climate change	++	
	2. Adapt to climate change	++	
3. Protect/enhance built environment	+?		
4. Decent, affordable homes	+?		
5. Maintain/support employment	0		
6. Conserve/enhance biodiversity and landscape	0		
7. Promote sustainable journeys	0		
8. Provide sufficient infrastructure	0		
9. Promote sustainable communities	0		
10. Encourage active lifestyles	0		
	<p>Commentary</p> <p>The council has investigated the way that this policy could be implemented in detail as a result of the high sustainability score that it would achieve. However after much consideration this option has not been progressed as it would be onerous on the developer and a number of concerns over viability that was raised during the viability testing. National policy is also looking to improve the building regulations requirements to bring about zero carbon homes by 2016 which would in affect make the policy redundant by when allowable solutions and the outcome of the Housing Standards Review are published.</p>		
Option 3: Include policy requiring CfSH Level 3 & BREEAM excellent, and the development to achieve a set of objectives that development should achieve to successfully contribute towards mitigating climate change.	1. Minimise climate change	++	Mitigation not required as no negative impacts identified.
	2. Adapt to climate change	++	
3. Protect/enhance built environment	+		
4. Decent, affordable homes	+		
5. Maintain/support employment	0		
6. Conserve/enhance biodiversity and landscape	0		
7. Promote sustainable journeys	0		
8. Provide sufficient infrastructure	0		
9. Promote sustainable communities	+?		
10. Encourage active lifestyles	0		
	<p>Commentary</p> <p>Option 3 provides developers with a flexible approach to ensure that climate change is mitigated by the proposed development. By ensuring developments are designed utilising passive before technological solutions, an affective and long lasting way of reducing energy consumption can be utilised.</p>		

Policy ENV7: District Energy Networks			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>Option 2: Include Local Plan policy with the council at the centre of network development</p> <p>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 could also hamper the efforts to create energy efficient networks within the borough. Option 3 was seen as an unrealistic option due to the uncertainty that it may bring.</p>		
Option 1: Have no policy	1. Minimise climate change	-?	

in relation to sourcing energy efficiently.	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 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. 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	Mitigation not required as no negative impacts identified.
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. This will in turn lead to an efficient supply of energy via district energy networks across the borough. With the council taking a lead on delivering these networks certainty can be provided in their delivery resulting in it receiving a higher positive impact on the sustainability objective. The policy aims at securing private development is connects or is capable of connecting to the network placing minimal burdens on developers whilst ensuring the network can be developed.			
Option 3: Include Local Plan policy encouraging the market to deliver network development.	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 The policy would hope to achieve the development of networks by placing the emphasis upon the private sector and the market to deliver then. This results in uncertainty and placed a larger burden on the private sector. Due to this reduced certainty or delivery and no guarantee as to the timeframe that they may take to materialise this option has scored worse in this SA.			

Policy ENV8: Development and Flood Risk			
<p>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:</p> <ol style="list-style-type: none"> 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	<p>Option 2: Include a locally specific flood risk policy.</p> <p>Option 2 has been chosen, as this better enables flood risk to be dealt with in a locally specific manner. It provides a policy hook through which the most up-to-date Environment Agency Flood Maps and recommendations of the SFRA can be taken into account in planning decisions, and in doing so the option delivers positive sustainability impacts against objectives 2, 3, 6, 8, and 9.</p>		
Option 1: Rely on national planning guidance.	1. Minimise climate change	0	
	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	0	
	9. Promote sustainable communities	+	
	10. Encourage active lifestyles	0	
	<p>Commentary</p> <p>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 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, particularly in flood risk terms, will be missed.</p> <p>Objective scoped out:</p> <p>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.	1. Minimise climate change	0	Mitigation not required as no negative impacts identified.
	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	0	
	<p>Commentary</p> <p>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:</p> <p>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 ENV9: Tackling Water Stress			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option:	<p>Option 1: Development of a local plan policy to mitigate the impact of development on the water environment.</p> <p>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.</p>		
Option 1: Develop a local plan policy to minimise the impact of development on the water environment.	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	Mitigation not required as no negative impacts identified.
	<p>Commentary</p> <p>Crawley is situated in an area of serious water stress, and recommends 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. To do this BREAAAM and CfSH water efficiency requirements have been made compulsory whilst allowing for any future changes in national policy, such as the introduction of nationally described standards, Such an approach would help mitigate a locally specific issue, thereby promoting a more sustainable plan. Therefore, Option 1 is the preferred approach.</p>		
Option 2: Do not include a policy and rely on existing national	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built	+ + 0	

requirements of the NPPF, and conformity with Code for Sustainable Homes and BREEAM to mitigate the impact of development on the water environment.	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: This approach would rely on existing national guidance (NPPF) and minimum water efficiency standards as identified in the Code for Sustainable Homes and BREEAM to mitigate the impact of development on the water environment. These codes are however not compulsory and 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. Added to this there is the potential for BREEAM and CfSH to be phased out in the coming years as standards are incorporated into the building regulations and the use of nationally described standards. This would have added further uncertainty over the Plan period.			

Policy ENV10: Pollution Management and Land Contamination			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	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. 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 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. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes	++ ++ ++ +	Mitigation not required as no negative impacts identified.

	5. Maintain/support employment	0	
	6. Conserve/enhance biodiversity and landscape	+	
	7. Promote sustainable journeys	0	
	8. Provide sufficient infrastructure	0	
	9. Promote sustainable communities	++	
	10. Encourage active lifestyles	0	
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 ENV11: Development and Noise			
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 been considered:			
<ol style="list-style-type: none"> 1. Do not include a noise policy in the Local Plan, instead relying on national guidance to manage the relationship between noise and development. 2. Include a policy within the Local Plan to take account of local circumstance, drawing upon both national guidance and locally specific guidance through 'Planning Noise Advice Document: Sussex'. 3. Include a policy within the local plan to take account of local circumstance, drawing upon national guidance, and locally specific guidance through 'Planning Noise Advice Document: Sussex' and a detailed Noise Annex to be included in the Local Plan to assist in policy interpretation. 			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 3: Include a locally specific noise policy in the local plan, drawing upon national planning policy and local guidance through 'Planning Noise Advice Document: Sussex', and a more detailed local plan noise appendix through which to interpret the policy.		
	Option 3 is chosen, as the approach enables greater certainty when having regard to noise in development management decisions, whilst also 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, instead relying on the guidance of the NPPF.	1. Minimise climate change	0	
	2. Adapt to climate change	0	
	3. Protect/enhance built environment	0	
	4. Decent, affordable homes	0	
	5. Maintain/support employment	0	
	6. Conserve/enhance biodiversity and landscape	0	
	7. Promote sustainable journeys	0	
	8. Provide sufficient infrastructure	0	
	9. Promote sustainable communities	+?	
	10. Encourage active lifestyles	0	
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 NPPF to:			
<ul style="list-style-type: none"> • avoid noise from giving rise to significant adverse impacts on health and 			

	<p>quality of life as a result of development, and</p> <ul style="list-style-type: none"> 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 key area of uncertainty is that the NPPF has withdrawn the Noise Exposure Categories of PPG24: Planning and Noise, and no practice guidance is 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 uncertainty in determining the level at which the onset of noise exposure become inappropriate, a key issue that must be considered in determining noise related applications.</p> <p>Objectives scoped out: Objectives 1-8, and 10 do not specifically relate to issues of noise.</p>		
<p>Option 2: Include a locally specific noise policy in the local plan, drawing upon national planning policy and 'Planning Noise Advice Document: Sussex'.</p>	<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 	<p>0 0 0 0 0 0 0 0 + 0</p>	
<p>Commentary</p> <p>Option 2 would involve the inclusion of a locally specific noise policy within the local plan. The approach would enable the local plan to ensure that national planning policy relating to noise is reflected, by drawing upon the Planning Noise Advice Document Sussex as a means of identifying situations in which noise will be a material consideration in planning decisions, and providing consistent cross-county guidance as to how noise should be mitigated in development. However, the document does not provide guidance relating to the impact of aircraft noise, which is a key planning consideration in Crawley. For this reason, it is considered that more locally specific planning guidance is required.</p> <p>Objectives scoped out: Objectives 1-8, and 10 do not specifically relate to issues of noise.</p>			
<p>Option 3: Include a locally specific noise policy in the Local Plan, drawing upon national planning policy and local guidance through 'Planning Noise Advice Document: Sussex', and a more detailed local plan noise annex through which to interpret the policy.</p>	<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 	<p>0 0 0 0 0 0 0 0 + 0</p>	<p>Mitigation not required as no negative impacts identified.</p>
<p>Commentary</p> <p>Option 3 applies a similar policy approach to Option 2 above, though also draws upon locally-specific guidance set out in a Local Plan Noise Annex as a means of locally identifying the noise exposure levels at which noise impact becomes unacceptable.</p> <p>To achieve this, the Local Plan Noise Annex draws upon the former guidance of PPS24 (an approach adopted by many local authorities) alongside technical evidence, local planning decisions and the professional expertise of Environmental</p>			

	Health Officers, to provide detailed guidance setting out the circumstances in which noise assessment and mitigation will be required. The approach offers the benefit of working alongside and building upon the Planning Noise Advice Document: Sussex, whilst also setting out specific guidance that forms part of the Local Plan. Objectives scoped out: Objectives 1-8, and 10 do not specifically relate to issues of noise.
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Policy ENV12: Air Quality			
<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> <ol style="list-style-type: none"> 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. 			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 2: Include a locally specific air quality policy in the Local Plan. 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.		
Option 1: Do not include a specific air quality policy in the Local Plan, instead relying on the guidance of 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	+ + 0 0 0 + 0 0 + 0	
<p>Commentary</p> <p>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 air quality from individual sites in local areas (NPPF Paragraph 124). - ensuring through planning decisions that new development in an AQMA is consistent with the local air quality action plan (NPPF Paragraph 124). <p>The 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, whilst it is important to draw upon</p>			

	objectives set out within Air Quality Management Plans to address identified air quality issues. As such, it is considered that local guidance of some form will be necessary.		
Option 2: Include a locally specific air quality policy in the Local Plan.	1. Minimise climate change	++	Mitigation not required as no negative impacts identified.
	2. Adapt to climate change	++	
	3. Protect/enhance built environment	0	
	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	0	
	9. Promote sustainable communities	++	
	10. Encourage active lifestyles	0	
	<p>Commentary</p> <p>Option 2 would involve the inclusion of a locally specific air quality policy within the local plan that refers to 'Air Quality & Emission Mitigation Guidance for Sussex' produced by Sussex Air in partnership with Sussex Local Planning Authorities. The document sets out 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 locally specific policy would draw upon this guidance, and would also enable any objectives identified within Air Quality Management Plans to be taken into account through the planning process. Further, a Local Plan policy approach provides an opportunity to consider any 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>		

Infrastructure

Policy IN1: Infrastructure Provision			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>Option 1: A case by case assessment on relevant applications to ensure that where relevant new infrastructure is provided and existing infrastructure is protected.</p> <p>Option 1 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.</p>		
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. Minimise climate change	+?	Mitigation not required as no negative impacts identified.
	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		
7. Promote sustainable journeys	+		
8. Provide sufficient infrastructure	++		
9. Promote sustainable communities	++		
10. Encourage active lifestyles	+		
<p>Commentary</p> <p>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.</p>			
Option 2: Do nothing locally and rely on NPPF	1. Minimise climate change	+?	
	2. Adapt to climate change	+?	
	3. Protect/enhance built environment	0	
	4. Decent, affordable homes	0	
	5. Maintain/support employment	0	
	6. Conserve/enhance biodiversity and landscape	0	
	7. Promote sustainable journeys	++	
	8. Provide sufficient infrastructure	++	
	9. Promote sustainable communities	++	
	10. Encourage active lifestyles	+	

	<p>Commentary</p> <p>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.</p>
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Policy IN2: Strategic Delivery of Telecommunications Infrastructure

Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>Option 1: A specific policy relating to the strategic delivery of telecommunications.</p> <p>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.</p>		
Option 1: A specific policy relating to the strategic delivery of telecommunications.	1. Minimise climate change	+	Mitigation not required as no negative impacts identified.
	2. Adapt to climate change	+	
3. Protect/enhance built environment	0		
4. Decent, affordable homes	0		
5. Maintain/support employment	+		
6. Conserve/enhance biodiversity and landscape	0		
7. Promote sustainable journeys	+		
8. Provide sufficient infrastructure	++		
9. Promote sustainable communities	0		
10. Encourage active lifestyles	0		
<p>Commentary</p> <p>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/</p>			
Option 2: Relying on the policies dealing with the general provision of infrastructure.	1. Minimise climate change	+	
	2. Adapt to climate change	+	
3. Protect/enhance built environment	0		
4. Decent, affordable homes	0		
5. Maintain/support employment	+		
6. Conserve/enhance biodiversity and landscape	0		
7. Promote sustainable journeys	+		
8. Provide sufficient infrastructure	++		
9. Promote sustainable communities	0		
10. Encourage active lifestyles	0		
<p>Commentary</p> <p>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</p>			

infrastructure.

Policy IN3: Development and Requirements for Sustainable Transport			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>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 be achieved using the existing transport infrastructure.</p> <p>Option 1 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 the effects of climate change (SA Objective 1). However, relying on the broader policies contained within the NPPF (Option Two) will have a impact on whether new developments that generate significant transport movements are located within the appropriate locations, since the NPPF states that 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.</p>		
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 be achieved using the existing transport infrastructure.	1. Minimise climate change	+	Mitigation not required as no negative impacts identified.
	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		
7. Promote sustainable journeys	++		
8. Provide sufficient infrastructure	+		
9. Promote sustainable communities	+?		
10. Encourage active lifestyles	+		
	<p>Commentary</p> <p>SA Objectives scoped out:</p> <p>6. Conserve/ enhance biodiversity habitats</p> <p>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 option. It is unlikely that this policy option will have a significant effect either 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 the 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 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.</p>		
Option 2: Do nothing locally and rely solely on the NPPF to promote sustainable transport policies.	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	
	7. Promote sustainable journeys	+	
	8. Provide sufficient infrastructure	+?	
	9. Promote sustainable communities	+?	
	10. Encourage active lifestyles	+?	
<p>Commentary</p> <p>SA Objectives scoped out:</p> <p>6. Conserve/ enhance biodiversity 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' movements are located where the need to travel is minimal. Thus, with such a general policy 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 a 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 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, as would the residents' participation in sport (SA Objective 10) and the creation of cohesive communities (SA Objective 9). Lastly, it is believed that the usage of existing transport infrastructure for new developments will become more uncertain (SA Objective 8) within the borough.</p>			

Policy IN4: Car and Cycle Parking Standards			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>Option 1: Create parking standards for different uses including non-residential and residential uses, and moreover, different locations which reflect the different levels of accessibility within the town.</p> <p>Option 1 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 most sustainable way forward in terms of the Sustainability Appraisal. Indeed, owing to the unique characteristics of Crawley, neighbourhood parking is a substantial problem, 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 standards for that particular area (SA Objective 8), and as such, residential neighbourhoods may suffer further from a lack car parking.</p>		
Option 1: Create parking standards for different uses including non-residential and residential uses, and moreover, different locations which reflect the different levels of accessibility within the town.	1. Minimise climate change	+	Mitigation of SA Objective 6 would be required. The need for car parking will be weighed against the potential loss of environmental quality, and moreover, the Planning Obligations and s106 Agreements SPD (which contains the parking standards) will be kept under review to ensure that sustainable transport modes are still promoted effectively.
	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	0	
	<p>Commentary</p> <p>SA Objectives scoped out:</p> <p>9. Healthy active cohesive communities.</p> <p>10. Participate in sport/health</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 the 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 provision. Clearly, new parking will also 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 through the development control process. The provision of an appropriate number of car/cycle parking spaces would assist in maintaining transport infrastructure within Crawley (SA Objective 8). In terms of affordable housing provision (SA Objective 4), the proposed parking standards could have a negative affect on viability, although each proposal for new housing in terms of new parking will be judged on its own particular merits.</p>		
Option 2: Only implement parking standards for Town Centre locations, as prioritised within the NPPF. This national policy is considered to provide convenient, safe and secure parking, in order to promote economic growth.	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	0	
	<p>Commentary</p> <p>SA Objectives scoped out:</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 the 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 within the town centre (SA Objective 5), as sites become undesirable. 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 provision. There would also 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 (SA Objective 8). In terms of affordable housing provision (SA Objective 4), the proposed parking standards could have a negative affect on viability, although each proposal for new housing in terms of new parking will be judged on its own particular merits.</p>		

Policy IN5: The Location and Provision of New Infrastructure			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>Option 1: Locating new infrastructure in the most accessible locations.</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 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.</p>		
Option 1: Locating new infrastructure in the most accessible locations.	<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"> ++ 0 0 0 + 0 ++ + + + 	Mitigation not required as no negative impacts identified.
	<p>Commentary</p> <p>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.	<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"> + 0 0 0 + 0 + + + + 	
	<p>Commentary</p> <p>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</p>		

	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.
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Policy IN6: Improving Rail Stations			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>Option 1: To concentrate improvements and development within the vicinity of the rail stations to enhance the specific roles of each station.</p> <p>Option 1 has been chosen since broadly, this policy option has a more positive impact on both the natural and built environment, particularly 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 is 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, and more residents choose to use their private motor vehicle.</p>		
Option 1: To concentrate improvements and development within the vicinity of the rail stations to enhance the specific roles of each station.	1. Minimise climate change	+	Mitigation not required as no negative impacts identified.
	2. Adapt to climate change	+?	
3. Protect/enhance built environment	+		
4. Decent, affordable homes	0		
5. Maintain/support employment	+?		
6. Conserve/enhance biodiversity and landscape	0		
7. Promote sustainable journeys	++		
8. Provide sufficient infrastructure	+		
9. Promote sustainable communities	+?		
10. Encourage active lifestyles	0		
	<p>Commentary</p> <p>SA objectives scoped out:</p> <p>4. Decent affordable homes</p> <p>6. Conserve/ enhance biodiversity habitats</p> <p>10. Participate in sport/health</p> <p>The main thrust of this policy option is to concentrate 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 is likely to 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 rail 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 have no significant effect upon creating a healthy and cohesive community (SA Objective 9).</p>		
Option 2: To ensure that the four rail stations within the borough are maintained up to the current standards and to	1. Minimise climate change	+	
	2. Adapt to climate change	?	
	3. Protect/enhance built environment	+?	
	4. Decent, affordable homes	0	

seek improvements to the both the accessibility and capacity of rail stations only, without promoting major developments within the vicinity of the rail stations.	5. Maintain/support employment	?	
	6. Conserve/enhance biodiversity and landscape	0	
	7. Promote sustainable journeys	+	
	8. Provide sufficient infrastructure	+?	
	9. Promote sustainable communities	/	
	10. Encourage active lifestyles	0	
<p>Commentary</p> <p>SA objectives scoped out:</p> <p>4. Decent affordable homes</p> <p>6. Conserve/ enhance biodiversity habitats</p> <p>10. Participate in sport/health</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's 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>			
Option 3: This policy option will only look to maintain the status quo and ensure that rail stations and services are not significantly reduced or left to deteriorate.	1. Minimise climate change	-	
	2. Adapt to climate change	+?	
	3. Protect/enhance built environment	+?	
	4. Decent, affordable homes	0	
	5. Maintain/support employment	-	
	6. Conserve/enhance biodiversity and landscape	0	
	7. Promote sustainable journeys	-	
	8. Provide sufficient infrastructure	?	
	9. Promote sustainable communities	/	
	10. Encourage active lifestyles	0	
<p>Commentary</p> <p>SA objectives scoped out:</p> <p>4. Decent affordable homes</p> <p>6. Conserve/ enhance biodiversity habitats</p> <p>10. Participate in sport/health</p> <p>The main direction 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 the private motor vehicle if rail costs and patronage rise. 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, may become 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</p>			

	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).
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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 1: A policy to allow crossovers. 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. 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	Mitigation for both SA Objective 2 and 6 will be through other policies within the Local Plan (notably in the environment chapter). In addition, Policy IN7 states that crossovers will only be permitted where the amenity of the street scene is not adversely affected.
	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. 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	
	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.
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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	<p>Option 1: Enable the growth of the airport.</p> <p>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.</p>		
Option 1: Enable the growth of the airport.	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	Section 106 agreement with the airport operator which sets out on obligations relating to mitigating the environmental impact of the airport.
	<p>Commentary</p> <p>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.</p>		
Option 2: Assess applications against general planning policies.	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	

	<p>Commentary</p> <p>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.</p>
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Policy GAT2: Safeguarded Land			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>Option 1: Safeguard land for a second runway.</p> <p>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.</p>		
Option 1: Safeguard land for a second runway.	<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 	<p style="text-align: center;">?</p> <p style="text-align: center;">?</p> <p style="text-align: center;">?</p> <p style="text-align: center;">0</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;">0</p>	<p>If a second runway were to be built at Gatwick, the 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.</p>
	<p>Commentary</p> <p>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.</p>		
Option 2: No Other Option.			
	<p>Commentary</p> <p>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.</p>		

Policy GAT3: Gatwick Airport Related Parking			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>Option 1: To provide additional car parking within the airport boundary.</p> <p>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</p>		

	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. Minimise climate change	-	
	2. Adapt to climate change	-	
	3. Protect/enhance built environment	0	
	4. Decent, affordable homes	0	
	5. Maintain/support employment	/	
	6. Conserve/enhance biodiversity and landscape	0	
	7. Promote sustainable journeys	--	
	8. Provide sufficient infrastructure	/	
	9. Promote sustainable communities	0	
	10. Encourage active lifestyles	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. Minimise climate change	-	
	2. Adapt to climate change	-	
	3. Protect/enhance built environment	0	
	4. Decent, affordable homes	0	
	5. Maintain/support employment	/	
	6. Conserve/enhance biodiversity and landscape	0	
	7. Promote sustainable journeys	--	
	8. Provide sufficient infrastructure	/	
	9. Promote sustainable communities	0	
	10. Encourage active lifestyles	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 addition 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	1. Minimise climate change	0	
	2. Adapt to climate change	0	

floorspace.	3. Protect/enhance built environment	0	
	4. Decent, affordable homes	0	
5. Maintain/support employment	+		
6. Conserve/enhance biodiversity and landscape	0		
7. Promote sustainable journeys	+		
8. Provide sufficient infrastructure	0		
9. Promote sustainable communities	0		
10. Encourage active lifestyles	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. Minimise climate change	0	
	2. Adapt to climate change	0	
3. Protect/enhance built environment	0		
4. Decent, affordable homes	0		
5. Maintain/support employment	/		
6. Conserve/enhance biodiversity and landscape	0		
7. Promote sustainable journeys	+		
8. Provide sufficient infrastructure	0		
9. Promote sustainable communities	0		
10. Encourage active lifestyles	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.			

Deleted Policy

Town Centre North			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>Option 5: An asset management and piecemeal approach to town centre development.</p> <p>Options 1 or 2 would be preferable in terms of delivering a comprehensive retail-led 'step-change' development capable of expanding and reinforcing Crawley's role as a sub-regional retail destination. However, it is recognised that despite extensive joint-working with retail partners, a scheme of this type cannot be delivered within the current economic climate. Therefore, it is necessary for the Local Plan to take a more pragmatic approach which responds to market signals and focuses on promoting regeneration that can be delivered. For this reason, Option 5 is identified as the chosen approach. Although this will not deliver the full range of benefits associated with Options 1 or 2, and as a consequence, might be less sustainable, the scheme would enable several smaller sites to contribute to improving the town centre's offer by promoting a flexible range of main town centre uses and residential development, enhancing the physical environment, and raising Crawley's overall profile as a vibrant, sub-regional town centre. Although it is recognised that individual development proposals would likely be delivered 'as and when', the overarching approach of Option 5 is viable and deliverable, and is considered to represent the most likely means of achieving rejuvenation and improvement to the town centre that will maintain and enhance Crawley's overall competitiveness over the Plan period to 2030. As such, although Option 5 may not represent the most sustainable approach, it is a deliverable option for securing town centre improvements and is therefore progressed as the chosen option.</p>		
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>+</p> <p>+</p> <p>++</p> <p>++</p> <p>++</p> <p>?</p> <p>++</p> <p>++</p> <p>++</p> <p>++</p> <p>+</p>	<p>Mitigation not required as no negative impacts identified.</p>
	<p>Commentary</p> <p>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</p>		

	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 not progressed.		
Option 2: Develop the overall TCN concept in phases, including a core retail element.	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	+ + ++ +? + ? ++ ++ ++ ++ +?	Mitigation not required as no negative impacts identified.
	<p>Commentary</p> <p>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. A high quality retail element of the overall revised TCN concept, located 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.</p> <p>During the council’s partnership with Stanhope, it was recognised that the Option 2 approach, focusing on a smaller core retail element retained the potential to bring forward many of the value generating components of the Option 1 TCN scheme whilst de-risking and scaling back the largest element of the TCN allocation. In seeking to progress the Option 2 approach Stanhope, the council’s development partner, worked with the council to try to develop a scheme and an overall approach to the town centre which would be attractive to the major retailer or retailers needed to anchor any development. This included negotiations with alternative retail anchors and exploration of opportunities to deliver a leisure-led scheme supported by retail. However, despite having worked positively to assess the available options, it has not been possible to overcome the obstacles to agree terms with an anchor retailer or other lead operator, and both the council and Stanhope have agreed that Town Centre North (as per Option 2) is not deliverable and cannot be progressed in the current climate or for the foreseeable future. For this reason, Option 2 is not considered to be deliverable and is not progressed.</p>		
Option 3: A new scheme in Town Centre East.	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.	+ + - +?	

	<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. Promote healthy, active, cohesive and socially sustainable communities</p> <p>10. Participate in sport/ health</p>	<p>+</p> <p>?</p> <p>+</p> <p>+</p> <p>+</p> <p>+?</p>	
	<p>Commentary</p> <p>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 not progressed.</p>		
Option 4: A new scheme in Town Centre West	<p>1. To minimise climate change</p> <p>2. To adapt to climate change</p> <p>3. Protect/enhance built environment</p> <p>4. Ensure everyone has the opportunity to live in a decent and 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. Promote healthy, active, cohesive and socially sustainable communities</p> <p>10. 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>	<p>Mitigation not required as no negative impacts identified.</p>
	<p>Commentary</p> <p>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 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</p>		

	<p>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; subsequently this option is not progressed.</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>Through delivering development in a piecemeal, rather than phased or comprehensive manner, it is possible that some elements of infrastructure that would have been delivered through TCN are lost. This can potentially be mitigated through developer contributions and CIL.</p>
<p>Commentary</p> <p>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. Under this approach, Town Centre North would not be pursued as a Local Plan policy. Rather, the existing Town Centre North allocation would be broken down into smaller, more deliverable allocations, which would be identified together with other sites in a specific Town Centre and Edge-of-Centre Site policy. 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 offer across a range of main town centre uses and residential, enhancing the physical environment, and maintaining Crawley's overall profile as a vibrant sub-regional town centre. 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</p>			

	<p>delivering the desired step change that could be delivered through Options 1 or 2, and similarly would not be as effective in raising Crawley's profile as a major sub-regional centre. It is recognised that a genuine step change can only be achieved via a comprehensive or phased approach which substantially alters the town centre's urban fabric and retail offer. Under the Option 5 approach, individual development proposals would be delivered 'as and when' led by the market. It is recognised that this approach would lack the strong linkages and co-ordination that could be achieved through Options 1 or 2, though would enable a policy framework to be implemented which identifies specific sites for flexible development across a range of uses. It is, therefore, considered that although this may not be the most sustainable approach, it does represent the most deliverable and achievable means of planning positively to promote the overall competitiveness of Crawley town centre as an attractive, vital and viable town centre. Option 5 is, therefore, brought forward as the chosen approach. This does not require a separate policy to the ones already taken forward within the Local Plan.</p>
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APPENDIX G: SUBMISSION LOCAL PLAN SITE ALLOCATIONS AND DESIGNATIONS APPRAISAL

Assessment of Deliverable Key Housing Sites (Policy H2)

Site Name: Forge Wood, Pound Hill

Site Potential Use: Housing (1,900 homes)

Site Description: Existing allocation as a comprehensive mixed use neighbourhood located to the North of the A2011 within Pound Hill. The site comprises a mixture of land uses including open countryside, crematorium, residential and farm dwellings and gas holder.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	Whilst relatively remote from existing neighbourhoods, the site offers the most sequentially preferable neighbourhood extension to Pound Hill to provide a comprehensive mixed use neighbourhood comprising 1900 dwellings, neighbourhood centre, local employment, primary school and doctor's surgery. Sustainable design and construction. Uncertain Impact (?)
2. Adapt to Climate Change	Part of the site is located within Flood Zones 2 and 3 related to the Gatwick Stream. The approved masterplan for the site does not include residential development within either of the Flood Zones and is reserved as open space/woodland/parkland. However, the remainder of the development would reduce permeable surfacing and increase significant increases in hard surface area, increasing surface water runoff. Development will include suitable proposals for sustainable urban drainage in mitigation. Neutral Impact (/)
3. Protect and/or Enhance the Built Environment	The development comprises a largely greenfield extension to Crawley to provide a new neighbourhood, as such, the development of 1900 new homes would be fundamentally different to the existing character of the area as open countryside and farmland with areas of previously developed land. Development of the site would alter the countryside setting of the locality and setting of existing residential properties immediately adjacent to the site. However, the approved masterplan contains large areas of open space and woodland which partly mitigates the land take associated with the built elements of the development. Negative Impact (-)
4. Decent/Affordable Homes	Offers 1900 new homes, significantly increasing the capacity of the town to meet some of the need emerging from the population. 40% affordable. Significant Positive Impact (++)
5. Maintain/Support Employment	The neighbourhood contains local employment provision linked both to the neighbourhood centre and bespoke provision to support economic growth. Significant Positive Impact (++)
6. Conserve/Enhance Biodiversity and	Site is currently open fields and woodland and as such, there is substantial tree cover across a large proportion of the site with mature tree lines running along the southern boundary with the main road. Structural landscaping has been largely maintained as part of the design and layout of the development scheme and offers a wide buffer zone, increasing the

Landscape	planting and biodiversity value of this area. Further biodiversity enhancements will also be designed in to any scheme. Possible Positive or Slight Positive Impact (+?)
7. Promote Sustainable Journeys	The site is located within the Built-Up Area Boundary and is physically distant from existing neighbourhoods and employment locations. However, public transport connections and cycling are integral to the new neighbourhood. Uncertain impact (?)
8. Provide Sufficient Infrastructure	Owing to the formal planning application that has been submitted and approved by the Local Planning Authority, it is assumed that the necessary infrastructure will be provided as part of the scheme. Neutral Impact (/)
9. Promote Sustainable Communities	The site is to be developed as a mixed use neighbourhood and comprises a range of related land uses including primary school, doctor's surgery, employment land and located within the built-up area boundary, close adjacent to the existing Bewbush Neighbourhood, with access to the neighbourhood centre, schools, and local health facilities. Significant Positive Impact (++)
10. Encourage Active Lifestyles	The site would result in the loss of open countryside and informal recreational space. However, the redevelopment of the site provides for large areas of planned open space including locally equipped areas of play, school playing fields, playing fields, cycle routes and allotments. It is therefore considered the approved layout and design of the new neighbourhood will fully encourage active lifestyles. Positive Impact (+)
Conclusions	The site offers the opportunity to provide additional housing to meet the needs of the growing population of Crawley. It is an existing housing allocation and the new neighbourhood will be well provided with new recreation/sports facilities.

Assessment of Allocated Housing Sites (Policy H2)

Site Name: Breezehurst Drive, Bewbush

Site Potential Use: Housing (112 dwellings)

Site Description: Former sports centre, car park, play area and open space, located in Bewbush, close to the neighbourhood centre.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	Close to neighbourhood centre: sustainable location. Sustainable design and construction. There are no known issues with land contamination or noise, air or water pollution. Positive Impact (+)
2. Adapt to Climate Change	The land immediately to the west of the site is identified Flood Zone (2 and 3). However, this land is not being developed. The development of the remainder of the site would reduce permeable surfacing and increase significant increases in hard surface area, increasing surface water runoff. Development would have to include suitable proposals for sustainable urban drainage in mitigation including SUDS and modular tanks. Possible Positive or Slight Positive Impact (+?)
3. Protect and/or Enhance the Built Environment	General residential area, new residential properties would be in-keeping with the location. Development of this site would alter the setting of the existing residential properties immediately adjacent to the site. However, good quality design will enhance the built environment and views to and from these properties. Possible Positive or Slight Positive Impact (+?)
4. Decent/ Affordable Homes	Will provide 112 new homes. Increasing the capacity of the town to meet some of the need emerging from the population. 60% of the new dwellings are to be affordable. Significant Positive Impact (++)
5. Maintain/ Support Employment	Provision of new housing is closely linked to supporting economic growth. Significant Positive Impact (++)
6. Conserve/ Enhance Biodiversity and Landscape	Site was previously sports centre, car park, play area and open space. Biodiversity enhancements should be designed in to any scheme in particular those parts of the site near Douster's Brook, located at the western edge of the site. Possible Positive or Slight Positive Impact (+?)
7. Promote Sustainable Journeys	The site is located close to the existing urban area, in a sustainable location to promote public transport use, cycling and walking. Significant Positive Impact (++)
8. Provide	Owing to the formal planning application that has been submitted and approved by the Local Planning Authority, it is

SA Objective	Commentary and/or Impact
Sufficient Infrastructure	assumed that the necessary infrastructure will be provided as part of the scheme. Neutral Impact (/)
9. Promote Sustainable Communities	The site is located within the built-up area boundary, close to the existing neighbourhood centre, with access to the neighbourhood centre and schools. Significant Positive Impact (++)
10. Encourage Active Lifestyles	The site is the residential element of the Central Bewbush Regeneration Area. The development and improvements originally consulted upon and agreed in the formulation of the Central Bewbush SPD. These improvements included changing rooms, a community meeting facility and drainage works to enhance and increase the use of the sports pitches to the south of the site. A pocket park and 2 MUGAs were also created immediately to the north of the proposed site. These improvements create open space facilities that are of higher quality, in a good location and better suited to the needs of the Bewbush community. Positive Impact (+)
Conclusions	Site offers the opportunity to provide additional housing to meet the needs of the growing population of Crawley, in particular affordable housing needs. There will be some loss of open space but the enhancements create high quality open spaces better suited to the needs of the Bewbush community.

Assessment of Allocated Housing Sites (Policy H2)

Site Name: Ifield Community College

Site Potential Use: Housing (125 dwellings)

Site Description: The site comprises surplus educational land which has permission for 170 residential units. The capacity identified in Policy H2 (125 units) represents a more realistic assessment of capacity based upon a lower density scheme comprising a broader mix of units.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The site is located within walking distance of the neighbourhood centre and is situated within a sustainable location. Sustainable design and construction will be employed in the design and there are no known issues with land contamination or noise, air or water pollution. Positive Impact (+)
2. Adapt to Climate Change	The site is not within flood zone. Development would have to include suitable proposals for sustainable urban drainage in mitigation. Neutral Impact (/)
3. Protect and/or Enhance the Built Environment	Development of this site would need to take into account the character of the surrounding residential area and good quality design would enhance the built environment. Positive Impact (+)
4. Decent/Affordable Homes	Could offer approximately 125 new homes. Increasing the capacity of the town to meet some of the need emerging from the population. 40% affordable. Significant Positive Impact (++)
5. Maintain/Support Employment	Provision of new housing is closely linked to supporting economic growth. Significant Positive Impact (++)
6. Conserve/Enhance Biodiversity and Landscape	Site is former educational land (parking and demolished buildings) with several mature trees. Biodiversity enhancements should be designed in to any scheme. Positive Impact (+)
7. Promote Sustainable Journeys	The site is located close to the existing urban area, in a sustainable location to promote public transport use, cycling and walking. Development of this site would increase traffic generation – transport modelling work has indicated junction capacity is sufficient for development in this location. Significant Positive Impact (++)
8. Provide Sufficient Infrastructure	As part of the planning application process, it is assumed that the necessary infrastructure will be provided as part of the scheme through either site specific S106 contributions or CIL contributions. Uncertain Impact (?)

SA Objective	Commentary and/or Impact
9. Promote Sustainable Communities	The site is located within the built-up area boundary, close to the neighbourhood centre, schools, and local health facilities. Significant Positive Impact (++)
10. Encourage Active Lifestyles	The site is located close to the existing schools and local health facilities within Ifield and Crawley town centre. Significant Positive Impact (++)
Conclusions	The site is a brownfield site, offering good opportunities for high quality residential development in a sustainable location.

Assessment of Allocated Housing Sites (Policy H2)

Site Name: Southern Counties, West Green

Site Potential Use: Housing (218 dwellings, mixed use)

Site Description: The site comprises a vacant site previously used as a car showroom/garage with petrol forecourt.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The site represents a sustainable town centre location. Sustainable design and construction. There are no known issues with regard to noise, air or water pollution, however, the site's previous use as a garage means that land contamination may be an issue. Positive Impact (+)
2. Adapt to Climate Change	The site is not within flood zone. Development would have to include suitable proposals for sustainable urban drainage in mitigation. Neutral Impact (/)
3. Protect and/or Enhance the Built Environment	General residential area, new residential properties would be in-keeping with the location. Development of this site would need to take into account the setting of the adjoining Conservation Area, however, good quality design could enhance the built environment. Positive Impact (+)
4. Decent/Affordable Homes	Could offer approximately 150 new homes. Increasing the capacity of the town to meet some of the need emerging from the population. 40% affordable. Significant Positive Impact (++)
5. Maintain/Support Employment	Provision of new housing is closely linked to supporting economic growth. The ground floor element of the scheme may comprise retail uses. Significant Positive Impact (++)
6. Conserve/Enhance Biodiversity and Landscape	The site is currently vacant. Biodiversity enhancements including new landscaping should be designed in to any scheme. Positive Impact (+)
7. Promote Sustainable Journeys	The site is located close to the existing urban area, in a sustainable location to promote public transport use, cycling and walking. Development of this site would increase traffic generation – transport modelling work has indicated junction capacity is sufficient for development in this location. Significant Positive Impact (++)
8. Provide Sufficient Infrastructure	As part of the planning application process, it is assumed that the necessary infrastructure will be provided as part of the scheme through either site specific S106 contributions or CIL contributions. Uncertain Impact (?)
9. Promote	The site is located within the built-up area boundary, close to the Town Centre, with good access to the town centre,

SA Objective	Commentary and/or Impact
Sustainable Communities	schools, and local health facilities. Significant Positive Impact (++)
10. Encourage Active Lifestyles	The site is located within walking distance to Goffs Park, allowing substantial opportunities for informal recreation. The site is located close to the existing schools and local health facilities within West Green and Crawley town centre. Significant Positive Impact (++)
Conclusions	The site is a brownfield site, offering good opportunities for high quality residential development in a sustainable location.

Assessment of Allocated Housing Sites (Policy H2)

Site Name: Land adjacent to Desmond Anderson School, Tilgate

Site Potential Use: Housing (100 dwellings)

Site Description: The site comprises surplus educational land and is mainly grass/scrubland with disused sports courts, hardstanding and paved areas.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The site is located within walking distance of the neighbourhood centre and is situated within a sustainable location. Sustainable design and construction will be employed in the design and there are no known issues with land contamination or noise, air or water pollution. Positive Impact (+)
2. Adapt to Climate Change	The site is located within Flood Zones 2 and 3 and a flood risk, drainage and sewerage assessment has been undertaken. Development would have to include suitable proposals for sustainable urban drainage in mitigation. Off-site attenuation is likely to be required to maximise the capacity of the site Uncertain Impact (?)
3. Protect and/or Enhance the Built Environment	Development of this site would need to take into account the character of the surrounding residential area and good quality design would enhance the built environment. The site has been vacant for a number of years and achieving a high quality residential development would enhance the quality of the built environment in this location Positive Impact (+)
4. Decent/Affordable Homes	Could offer approximately 100 new homes. Increasing the capacity of the town to meet some of the need emerging from the population. 40% affordable. Significant Positive Impact (++)
5. Maintain/Support Employment	Provision of new housing is closely linked to supporting economic growth. Significant Positive Impact (++)
6. Conserve/Enhance Biodiversity and Landscape	Site is former educational land (parking and demolished buildings) with several mature trees which are protected. Biodiversity enhancements should be designed in to any scheme. Positive Impact (+)
7. Promote Sustainable Journeys	The site is located close to the existing urban area, in a sustainable location to promote public transport use, cycling and walking. Development of this site would increase traffic generation – transport modelling work has indicated that highway capacity is sufficient for development in this location. Significant Positive Impact (++)
8. Provide Sufficient	As part of the planning application process, it is assumed that the necessary infrastructure will be provided as part of the scheme through either site specific S106 contributions or CIL contributions. Uncertain Impact (?)

SA Objective	Commentary and/or Impact
Infrastructure	
9. Promote Sustainable Communities	The site is located within the built-up area boundary, close to the neighbourhood centre, schools, and local health facilities. Significant Positive Impact (++)
10. Encourage Active Lifestyles	The site is located adjacent to an existing primary school and within reasonable walking distance to local health facilities and neighbourhood parade. Significant Positive Impact (++)
Conclusions	The site is a brownfield site, offering good opportunities for high quality residential development in a sustainable location.

Assessment of Allocated Housing Sites (Policy H2)

Site Name: Fairfield House, West Green

Site Potential Use: Housing (93 dwellings)

Site Description: The site comprises a vacant site previously used as nursing accommodation.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The site represents a sustainable town centre location. Sustainable design and construction. There are no known issues with regard to noise, air or water pollution Positive Impact (+)
2. Adapt to Climate Change	The site is not within flood zone. Development would have to include suitable proposals for sustainable urban drainage in mitigation. Neutral Impact (/)
3. Protect and/or Enhance the Built Environment	General residential area, new residential properties would be in-keeping with the location. Development of this site would need to take into account the setting of the Conservation Area to the south, however, good quality design would enhance the poor quality of the built environment in this location. Positive Impact (+)
4. Decent/Affordable Homes	Could offer approximately 93 new homes. Increasing the capacity of the town to meet some of the need emerging from the population. 40% affordable. Significant Positive Impact (++)
5. Maintain/Support Employment	Provision of new housing is closely linked to supporting economic growth. Significant Positive Impact (++)
6. Conserve/Enhance Biodiversity and Landscape	The site is currently vacant. Biodiversity enhancements including new landscaping should be designed in to any scheme. Positive Impact (+)
7. Promote Sustainable Journeys	The site is located close to the existing urban area, in a sustainable location to promote public transport use, cycling and walking. Development of this site would increase traffic generation – transport modelling work has indicated junction capacity is sufficient for development in this location. Significant Positive Impact (++)
8. Provide Sufficient Infrastructure	As part of the planning application process, it is assumed that the necessary infrastructure will be provided as part of the scheme through either site specific S106 contributions or CIL contributions. Uncertain Impact (?)
9. Promote	The site is located within the built-up area boundary, close to the Town Centre, with good access to the town centre,

SA Objective	Commentary and/or Impact
Sustainable Communities	schools, and local health facilities. Significant Positive Impact (++)
10. Encourage Active Lifestyles	The site is located within walking distance to Goffs Park, allowing substantial opportunities for informal recreation. The site is located close to the existing schools and local health facilities within West Green and Crawley town centre. Significant Positive Impact (++)
Conclusions	The site is a brownfield site, offering good opportunities for high quality residential development in a sustainable location.

Assessment of Allocated Housing Sites (Policy H2)

Site Name: 15-29 Broadway, Northgate

Site Potential Use: Housing (57 dwellings)

Site Description: The site comprises a vacant retail and office building

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The site represents a sustainable town centre location. Sustainable design and construction. There are no known issues with regard to air or water pollution, however, the location of the site within the town centre means that noise issues will have to be considered and mitigated against if necessary. Positive Impact (+)
2. Adapt to Climate Change	The site is not within flood zone. Development would have to include suitable proposals for sustainable urban drainage in mitigation. Neutral Impact (/)
3. Protect and/or Enhance the Built Environment	The site is located within the town centre and mixed use residential development would be in keeping with Local Plan objective of increasing residential development in the Town Centre. Good quality design could enhance the built environment. Positive Impact (+)
4. Decent/Affordable Homes	Could offer 57 new homes. Increasing the capacity of the town centre to meet some of the need emerging from the population. However, no affordable units are to be provided as part of the development, therefore the development will only assist those able to purchase or rent on the open market. Possible positive or slight positive impact (++)
5. Maintain/Support Employment	Provision of new housing is closely linked to supporting economic growth. The ground floor element of the scheme will comprise retail uses. Significant Positive Impact (++)
6. Conserve/Enhance Biodiversity and Landscape	The site is currently vacant. The scheme will include a number of energy efficient measures including green roof which will enhance biodiversity and reduce surface runoff. Positive Impact (+)
7. Promote Sustainable Journeys	The site is located within the Town Centre in a sustainable location to promote public transport use, cycling and walking. The site would be zero parking with no on-site parking provision. Significant Positive Impact (++)
8. Provide Sufficient Infrastructure	Owing to the formal planning application that has been submitted and approved by the Local Planning Authority, it is assumed that the necessary infrastructure will be provided as part of the scheme. Neutral Impact (/)

SA Objective	Commentary and/or Impact
9. Promote Sustainable Communities	The site is located within the town centre and mixed use residential development would be in keeping with Local Plan objective of increasing residential development in the Town Centre. Good quality design could enhance the built environment. Positive Impact (+)
10. Encourage Active Lifestyles	The site is located within reasonable walking distance to Southgate Playing Fields, allowing substantial opportunities for informal recreation. The site is located close to existing schools and local health facilities within the town centre and Southgate. Positive Impact (+)
Conclusions	The site is a brownfield site, offering good opportunities for high quality residential development in a sustainable location.

Assessment of Allocated Housing Sites (Policy H2)

Site Name: Kilnmead Car Park, Northgate

Site Potential Use: Housing (40 dwellings)

Site Description: The site is currently used as a car park

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The site represents a sustainable town centre location. Sustainable design and construction. There are no known issues with regard to air or water pollution, however, the location of the site adjacent to a training building means that noise issues will have to be considered and mitigated against if necessary. Positive Impact (+)
2. Adapt to Climate Change	The site is not within flood zone. Development would have to include suitable proposals for sustainable urban drainage in mitigation. Neutral Impact (/)
3. Protect and/or Enhance the Built Environment	The site is located within the town centre and mixed use residential development would be in keeping with Local Plan objective of increasing residential development in the Town Centre. Good quality design could enhance the built environment. The site is located adjacent to a Conservation Area and the design of any scheme will need to respect the character and appearance of the Conservation Area. Positive Impact (+)
5. Decent/Affordable Homes	Could offer 40 new homes. Increasing the capacity of the town centre to meet some of the need emerging from the population. 40% affordable. Significant positive impact (++)
8. Maintain/Support Employment	Provision of new housing is closely linked to supporting economic growth. Positive Impact (++)
4. Conserve/Enhance Biodiversity and Landscape	The site is currently used as a car park. Any scheme will include a number of energy efficient measures as proposed within the Local Plan. Positive Impact (+)
9. Promote Sustainable Journeys	The site is located within the Town Centre in a sustainable location to promote public transport use, cycling and walking. Positive Impact (+)
10. Provide Sufficient Infrastructure	The site is located adjacent to the existing residential properties which are served by existing infrastructure services. Uncertain Impact (?)

SA Objective	Commentary and/or Impact
6. Promote Sustainable Communities	The site is located within the town centre and residential development would be in keeping with Local Plan objective of increasing residential development in the Town Centre. Good quality design could enhance the built environment. Significant positive Impact (++)
7. Encourage Active Lifestyles	The site is located within reasonable walking distance to West Green Playing Fields, allowing substantial opportunities for informal recreation. The site is located close to existing schools and local health facilities within the town centre and West Green. Positive Impact (+)
Conclusions	The site is a brownfield site, offering good opportunities for high quality residential development in a sustainable location.

Assessment of Allocated Housing Sites (Policy H2)

Site Name: Zurich House, Southgate

Site Potential Use: Housing (59 dwellings)

Site Description: The site comprises a vacant office building.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The site represents a sustainable location immediately to the south of the Town Centre. Sustainable design and construction. There are no known issues with regard to noise, air or water pollution Positive Impact (+)
2. Adapt to Climate Change	The site is not within flood zone. Development would have to include suitable proposals for sustainable urban drainage in mitigation. Neutral Impact (/)
3. Protect and/or Enhance the Built Environment	General residential area, new residential properties would be in-keeping with the location. Development of this site would need to take into account the character and appearance of the surrounding residential area, however, good quality design would enhance the quality of the built environment in this location. Positive Impact (+)
5. Decent/Affordable Homes	Could offer approximately 59 new homes. Increasing the capacity of the town to meet some of the need emerging from the population. 40% affordable. Significant Positive Impact (++)
8. Maintain/Support Employment	Provision of new housing is closely linked to supporting economic growth. However, loss of employment land would need to be justified in terms of the site being no longer suitable, viable or appropriate for employment uses and that the loss of floorspace would result in a wider social gain, i.e. provision of affordable housing. Positive Impact (+)
4. Conserve/Enhance Biodiversity and Landscape	The site is currently vacant. Biodiversity enhancements including new landscaping should be designed in to any scheme. Positive Impact (+)
9. Promote Sustainable Journeys	The site is located close to the existing urban area, in a sustainable location to promote public transport use, cycling and walking. Significant Positive Impact (++)
10. Provide Sufficient Infrastructure	Owing to the formal planning application that has been submitted and approved by the Local Planning Authority, it is assumed that the necessary infrastructure will be provided as part of the scheme. Neutral Impact (/)

SA Objective	Commentary and/or Impact
6. Promote Sustainable Communities	The site is located close to the Town Centre, with good access to schools, public transport and local health facilities. Significant Positive Impact (++)
7. Encourage Active Lifestyles	The site is located within walking distance to Southgate Playing Fields, allowing substantial opportunities for informal recreation. The site is located close to the existing schools and local health facilities within Southgate. Significant Positive Impact (++)
Conclusions	The site is a brownfield site, offering good opportunities for high quality residential development in a sustainable location.

Assessment of Allocated Housing Sites (Policy H2)

Site Name: Tinsley Lane, Three Bridges

Site Potential Allocation: Housing (138 dwellings, mixed use recreation/residential)

Site Description: Playing Fields located to the north of the residential neighbourhood of Three Bridges, south of industrial units located in Manor Royal.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	Noise pollution associated with the airport and aggregates goods yard to the north of the site would need to be considered in design and mitigation of any properties. Air Quality and Noise issues have been identified in relation to the northern and southern most site and would need to be addressed fully before the site could be considered appropriate. Uncertain Impact (?)
2. Adapt to Climate Change	The site is currently greenfield, development of this site would increase hard surfacing. Uncertain Impact (?)
3. Protect and/or Enhance the Built Environment	Detailed assessment of this site would be required to ascertain whether limited intensification may be acceptable providing the impact on neighbour amenity, street scene, trees, character of the area and parking can be adequately addressed. Uncertain Impact (?)
4. Decent/Affordable Homes	Could offer a substantial proportion of new homes. Increasing the capacity of the town to meet some of the need emerging from the population and would include 40% affordable. Significant Positive Impact (++)
5. Maintain/Support Employment	Whilst the provision of new housing is closely linked to supporting economic growth, the development of this site would need to ensure the functioning of the businesses to the north is not impeded by additional residential properties. Possible Negative or Slight Negative Impact (-?)
6. Conserve/Enhance Biodiversity and Landscape	The site is short mown grass playing fields, adjacent to an area of Ancient Woodland, development of this site for residential could open up the access to the woodlands for the purposes of informal recreation. Development of this site would result in the loss of some greenfield land, however, any residential scheme would incorporate biodiversity enhancements. Uncertain Impact (?)
7. Promote Sustainable Journeys	The site is located within the urban area. Access to the site and parking issues are currently unknown and would need to be addressed before the site could be brought forward for development. Uncertain Impact (?)
8. Provide Sufficient	The site is located adjacent to the existing residential properties which are served by existing infrastructure services. Uncertain Impact (?)

SA Objective	Commentary and/or Impact
Infrastructure	
9. Promote Sustainable Communities	The site is adjacent to an established residential area. It is slightly removed from the neighbourhood centre of Three Bridges. Access to the site and parking issues are currently unknown. Uncertain Impact (?)
10. Encourage Active Lifestyles	For the proposal to be acceptable a combination of onsite and offsite provision of open space is needed. For example, relocating the existing sports pitches/pavilion to the northern area and using the remaining area as a mix of housing and open space to meet the needs of existing and new residents. Positive Impact (+)
Conclusions	There are a number of significant issues which need to be addressed before this site can be brought forward for development (loss of open space, air quality, transport assessment and aircraft noise).

Assessment of Allocated Housing Sites (Policy H2)

Site Name: Goffs Park Depot

Site Potential Use: Housing (30 dwellings)

Site Description: The site is located within Southgate, it was previously used as the council's depot. Following the depot's relocation, the site has remained vacant. It is adjacent to a Historic Park, which is also the setting for a listed building and a locally listed building.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	Close to neighbourhood centre: sustainable location. Sustainable design and construction. There are no known issues with land contamination or noise, air or water pollution. Positive Impact (+)
2. Adapt to Climate Change	The site is not within flood zone. Development would have to include suitable proposals for sustainable urban drainage in mitigation. Neutral Impact (/)
3. Protect and/or Enhance the Built Environment	General residential area, new residential properties would be in-keeping with the location. Development of this site would need to take into account the setting of the historic park, Goffs Park immediately adjacent to the site, and the listed and locally listed buildings within the Park. However, good quality design could enhance the built environment. Positive Impact (+)
4. Decent/Affordable Homes	Could offer approximately 30 new homes. Increasing the capacity of the town to meet some of the need emerging from the population. 40% affordable. Significant Positive Impact (++)
5. Maintain/Support Employment	Provision of new housing is closely linked to supporting economic growth. Significant Positive Impact (++)
6. Conserve/Enhance Biodiversity and Landscape	Site is currently vacant depot for CBC's nursery, the boundaries are well screened with mature trees and shrubs. Biodiversity enhancements should be designed in to any scheme. Positive Impact (+)
7. Promote Sustainable Journeys	The site is located close to the existing urban area, in a sustainable location to promote public transport use, cycling and walking. Development of this site would increase traffic generation – transport modelling work has indicated junction capacity is sufficient for development in this location. Significant Positive Impact (++)
8. Provide	The site is located close to the existing built up area, and would benefit from connections to the existing service

SA Objective	Commentary and/or Impact
Sufficient Infrastructure	infrastructure. The position of service providers will be sought through consultation to ensure the capacity for infrastructure is sufficient to include the development of up to 30 dwellings in this location. However, the long-term planning for development of this site allows for service providers to ensure investment is directed if needed to meet the needs of a new development. Uncertain Impact (?)
9. Promote Sustainable Communities	The site is located within the built-up area boundary, close adjacent to the existing Southgate Neighbourhood, with access to the neighbourhood centre, schools, and local health facilities. Significant Positive Impact (++)
10. Encourage Active Lifestyles	The site is located adjacent to Goffs Park, allowing substantial opportunities for informal recreation. The site is located close to the existing schools and local health facilities within Southgate and Crawley town centre. Significant Positive Impact (++)
Conclusions	The site is a brownfield site, offering good opportunities for high quality residential development in a sustainable location.

Assessment of Allocated Housing Sites (Policy H2)

Site Name: Former TSB Site, Russell Way, Three Bridges

Site Potential Use: Housing (40 dwellings)

Site Description: The site comprises vacant land within a Main Employment Area

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The site represents previously developed land within the Built-Up Area. The site is sustainably located within walking distance to the Town Centre and Three Bridges Station. There are no known issues with regard to noise, air or water pollution at this stage. Positive Impact (+)
2. Adapt to Climate Change	The site is not within flood zone. Development would have to include suitable proposals for sustainable urban drainage in mitigation. Neutral Impact (/)
3. Protect and/or Enhance the Built Environment	The site is located within an established employment area. Development of this site would need to take into account the mixed character and appearance of the surrounding area, however, good quality design would enhance the quality of the built environment in this location. Positive Impact (+)
4. Decent/Affordable Homes	Could offer approximately 40 new homes. Increasing the capacity of the town to meet some of the need emerging from the population. 40% affordable. Significant Positive Impact (++)
5. Maintain/Support Employment	Provision of new housing is closely linked to supporting economic growth. However, loss of employment land would need to be justified in terms of the site being no longer suitable, viable or appropriate for employment uses and that the loss of floorspace would result in a wider social gain, i.e. provision of affordable housing. Positive Impact (+)
6. Conserve/Enhance Biodiversity and Landscape	The site is currently vacant. Biodiversity enhancements including new landscaping should be designed in to any scheme. Positive Impact (+)
7. Promote Sustainable Journeys	The site is located close to the existing urban area, in a sustainable location to promote public transport use, cycling and walking. Significant Positive Impact (++)
8. Provide Sufficient Infrastructure	As part of the planning application process, it is assumed that the necessary infrastructure will be provided as part of the scheme through either site specific S106 contributions or CIL contributions. Uncertain Impact (?)
9. Promote	The site is located within walking distance to the Town Centre, with good access to schools, public transport and local

SA Objective	Commentary and/or Impact
Sustainable Communities	health facilities. Significant Positive Impact (++)
10. Encourage Active Lifestyles	The site is located within walking distance to Three Bridges Playing Fields, allowing substantial opportunities for informal recreation. The site is located close to the existing schools and local health facilities within Three Bridges. Significant Positive Impact (++)
Conclusions	The site is a brownfield site, offering good opportunities for high quality residential development in a sustainable location.

Assessment of Allocated Housing Sites (Policy H2)

Site Name: Land adjacent to Langley Green Primary School, Langley Green

Site Potential Use: Housing (30 dwellings)

Site Description: The site comprises surplus educational land.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The site is located opposite the neighbourhood centre and is situated within a sustainable location. Sustainable design and construction will be employed in the design and there are no known issues with land contamination or noise, air or water pollution. Positive Impact (+)
2. Adapt to Climate Change	The site is not within flood zone. Development would have to include suitable proposals for sustainable urban drainage in mitigation. Neutral Impact (/)
3. Protect and/or Enhance the Built Environment	Development of this site would need to take into account the character of the surrounding residential area and good quality design would enhance the built environment. Positive Impact (+)
4. Decent/Affordable Homes	Could offer approximately 48 new homes. Increasing the capacity of the town to meet some of the need emerging from the population. 40% affordable. Significant Positive Impact (++)
5. Maintain/Support Employment	Provision of new housing is closely linked to supporting economic growth. Significant Positive Impact (++)
6. Conserve/Enhance Biodiversity and Landscape	Site is former educational land (playing field). Biodiversity enhancements should be designed in to any scheme. There are a number of trees on the site which could contribute to biodiversity should these be retained/replaced as part of the development. Positive Impact (+)
7. Promote Sustainable Journeys	The site is located close to the neighbourhood parade, in a sustainable location to promote public transport use, cycling and walking. Significant Positive Impact (++)
8. Provide Sufficient Infrastructure	As part of the planning application process, it is assumed that the necessary infrastructure will be provided as part of the scheme through either site specific S106 contributions or CIL contributions. Uncertain Impact (?)
9. Promote	The site is located within the built-up area boundary, close to the neighbourhood centre, schools, and local health

SA Objective	Commentary and/or Impact
Sustainable Communities	facilities. Significant Positive Impact (++)
10. Encourage Active Lifestyles	The site is located adjacent to the existing primary school and local health facilities within Langley Green. Positive Impact (+)
Conclusions	The site is a greenfield site, offering good opportunities for high quality residential development in a sustainable location.

Assessment of Allocated Housing Sites (Policy H2)

Site Name: 5-7 Brighton Road, Southgate

Site Potential Use: Housing (48 dwellings)

Site Description: The site comprises a garage and associated workshop.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The site represents a sustainable location immediately to the south of the Town Centre. Sustainable design and construction. There are no known issues with regard to noise, air or water pollution Positive Impact (+)
2. Adapt to Climate Change	The site is not within flood zone. Development would have to include suitable proposals for sustainable urban drainage in mitigation. Neutral Impact (/)
3. Protect and/or Enhance the Built Environment	Mixed use residential/employment area, new residential properties would be in-keeping with the mixed nature of the location. Development of this site would need to take into account the character and appearance of the surrounding area, however, good quality design would enhance the quality of the built environment in this location. Positive Impact (+)
4. Decent/Affordable Homes	Could offer approximately 48 new homes. Increasing the capacity of the town to meet some of the need emerging from the population. 40% affordable. Significant Positive Impact (++)
5. Maintain/Support Employment	Provision of new housing is closely linked to supporting economic growth. The development of the site could provide for commercial/retail uses at ground floor. However, loss of employment land would still need to be justified in terms of the site being no longer suitable, viable or appropriate for employment uses and that the loss of floorspace would result in a wider social gain, i.e. provision of affordable housing. Positive Impact (+)
6. Conserve/Enhance Biodiversity and Landscape	The site is currently occupied and used as a garage and workshop. Biodiversity enhancements including new landscaping should be designed into any scheme. Positive Impact (+)
7. Promote Sustainable Journeys	The site is located close to the existing urban area, in a sustainable location to promote public transport use, cycling and walking. Significant Positive Impact (++)
8. Provide Sufficient Infrastructure	Owing to the formal planning application that has been submitted and approved by the Local Planning Authority, it is assumed that the necessary infrastructure will be provided as part of the scheme. Neutral Impact (/)

SA Objective	Commentary and/or Impact
9. Promote Sustainable Communities	The site is located close to the Town Centre, with relatively good access to schools, public transport and local health facilities. Significant Positive Impact (++)
10. Encourage Active Lifestyles	The site is located within walking distance of Goffs Park, allowing substantial opportunities for informal recreation. The site is located close to the existing schools and local health facilities within Southgate. Significant Positive Impact (++)
Conclusions	The site is a brownfield site, offering good opportunities for high quality residential development in a sustainable location.

Assessment of Allocated Housing Sites (Policy H2)

Site Name: WSCC Professional Centre, Furnace Green

Site Potential Use: Housing (76 dwellings)

Site Description: The site comprises previously developed land and buildings, formerly used as an educational centre

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The site represents previously developed land in a sustainable location. Sustainable design and construction. There are no known issues with regard to noise, air or water pollution. Positive Impact (+)
2. Adapt to Climate Change	The site is located within Flood Zone 2 and 3 and a drainage strategy would be required to satisfactorily address flooding issues. The development would have to include suitable proposals for sustainable urban drainage in mitigation. These proposals have been submitted to and approved by the Environment Agency Neutral Impact (/)
3. Protect and/or Enhance the Built Environment	Development of this site would need to take into account the character of the surrounding residential area and good quality design would enhance the built environment. Positive Impact (+)
4. Decent/Affordable Homes	Site will provide 76 new homes. Increasing the capacity of the town to meet some of the need emerging from the population. 40% affordable. Significant Positive Impact (++)
5. Maintain/Support Employment	Provision of new housing is closely linked to supporting economic growth. Significant Positive Impact (++)
6. Conserve/Enhance Biodiversity and Landscape	Site is former educational land (playing field). Biodiversity enhancements should be designed into any scheme. There are a number of trees on the site which contribute to biodiversity and should be retained/replaced as part of the development through appropriate conditions Positive Impact (+)
7. Promote Sustainable Journeys	The site is located close to the existing urban area, in a sustainable location to promote public transport use, cycling and walking. Significant Positive Impact (++)
8. Provide Sufficient Infrastructure	Owing to the formal planning application that has been submitted and approved by the Local Planning Authority, it is assumed that the necessary infrastructure will be provided as part of the scheme. Neutral Impact (/)

SA Objective	Commentary and/or Impact
9. Promote Sustainable Communities	The site is located close to the neighbourhood centre, with relatively good access to schools and public transport. Significant Positive Impact (++)
10. Encourage Active Lifestyles	The site is located within walking distance of The Hawth woodland allowing substantial opportunities for informal recreation. Significant Positive Impact (++)
Conclusions	The site is a brownfield site, offering good opportunities for high quality residential development in a sustainable location.

Assessment of Developable Key Housing Sites (Policy H2)

Site Name: Breezehurst Drive Playing Fields

Site Potential Use: Housing and Open Space (65 homes)

Site Description: Existing Playing Fields site: located in Bewbush, close to Dorsten Square. Part of the site currently used by Crawley Town Football Club as a training ground. The remainder of the site is taken up by an unused American Football Pitch.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	Close to neighbourhood centre: sustainable location. Sustainable design and construction. Air Quality/noise pollution – close to road? Uncertain Impact (?)
2. Adapt to Climate Change	Site is not within flood zone. Would reduce permeable surfacing and increase significant increases in hard surface area, increasing surface water runoff. Development would have to include suitable proposals for sustainable urban drainage in mitigation. Neutral Impact (/)
3. Protect and/or Enhance the Built Environment	General residential area, new residential properties would be in-keeping with the location. Development of this site would alter the setting of the existing residential properties immediately adjacent to the site. Possible Positive or Slight Positive Impact (+?)
4. Decent/Affordable Homes	Could offer 65 new homes. Increasing the capacity of the town to meet some of the need emerging from the population. 40% affordable. Significant Positive Impact (++)
5. Maintain/Support Employment	Provision of new housing is closely linked to supporting economic growth. Significant Positive Impact (++)
6. Conserve/Enhance Biodiversity and Landscape	Site is currently playing fields, and short mown grass. There are substantial mature tree lines running along the boundary with the main road. A line of trees run along the brook and public footpath to Buchan Park. The structural landscaping would have to be maintained as part of the design and layout of any development scheme and offer a wide buffer zone, increasing the planting and biodiversity value of this area. Further biodiversity enhancements should also be designed in to any scheme. Possible Positive or Slight Positive Impact (+?)
7. Promote Sustainable Journeys	The site is located close to the existing urban area, in a sustainable location to promote public transport use, cycling and walking. Significant Positive Impact (++)

SA Objective	Commentary and/or Impact
8. Provide Sufficient Infrastructure	The site is located close to the existing built up area, and would benefit from connections to the existing service infrastructure. The position of service providers will be sought through consultation to ensure the capacity for infrastructure is sufficient to include the development of up to 100 dwellings in this location. However, the long-term planning for development of this site allows for service providers to ensure investment is directed if needed to meet the needs of a new development. Uncertain Impact (?)
9. Promote Sustainable Communities	The site is located within the built-up area boundary, close adjacent to the existing Bewbush Neighbourhood, with access to the neighbourhood centre, schools, and local health facilities. Significant Positive Impact (++)
10. Encourage Active Lifestyles	The site would involve the loss of open space. The open space assessment has found that the current mix and amount of open space in Bewbush provides an opportunity to reduce the provision of some types of open space to meet housing need and in turn require new and improved open space as part of development including allotments and improvements to playing fields/sports pitches. Overall, this will ensure that open space in Bewbush is more usable and popular for residents and sports clubs. The site is located close to the existing schools and local health facilities within Bewbush and Crawley town centre. Positive Impact (+)
Conclusions	Site offers the opportunity to provide additional housing to meet the needs of the growing population of Crawley. Whilst there will be some loss of open space but the neighbourhood is well provided and should benefit from on-site provision and enhancements.

Assessment of Allocated Housing Sites (Policy H2)

Site Name: Henty Close, Bewbush

Site Potential Use: Housing (24 homes, including provision of replacement play area)

Site Description: Existing play area: located in Bewbush, close to the Kilnwood Vale new neighbourhood – located on the bus link between the two neighbourhoods. The site consists of a small children’s play area.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	Close to neighbourhood centre: sustainable location. Would allow pedestrian access to the new Kilnwood Vale neighbourhood. Sustainable design and construction. There are no known issues with land contamination or noise, air or water pollution. Development of this site would increase traffic generation – potentially leading to reduction in air quality: the transport modelling work should indicate whether mitigation is needed, particularly to improve junction capacity. Positive Impact (+)
2. Adapt to Climate Change	Part of the site is within flood zone: development would have to design in open space to take account of this and reduce the risk of flooding elsewhere within the site and beyond the site. Would reduce permeable surfacing and increase significant increases in hard surface area, increasing surface water runoff. Development would have to include suitable proposals for sustainable urban drainage in mitigation. Possible Positive or Slight Positive Impact (+?)
3. Protect and/or Enhance the Built Environment	General residential area, new residential properties would be in-keeping with the location. Development of this site would alter the setting of the existing residential properties immediately adjacent to the site. However, good quality design could enhance the built environment and views to and from Kilnwood Vale. Possible Positive or Slight Positive Impact (+?)
4. Decent/ Affordable Homes	Could offer up to 24 new homes. Increasing the capacity of the town to meet some of the need emerging from the population. 40% affordable. Significant Positive Impact (++)
5. Maintain/ Support Employment	Provision of new housing is closely linked to supporting economic growth. Significant Positive Impact (++)
6. Conserve/ Enhance Biodiversity and Landscape	Site is currently a play area with short mown grass and some shrubs. Biodiversity enhancements should be designed into any scheme. Possible Positive or Slight Positive Impact (+?)

SA Objective	Commentary and/or Impact
7. Promote Sustainable Journeys	The site is located close to the existing urban area, in a sustainable location to promote public transport use, cycling and walking. Significant Positive Impact (++)
8. Provide Sufficient Infrastructure	The site is located close to the existing built up area, and would benefit from connections to the existing service infrastructure. The position of service providers will be sought through consultation to ensure the capacity for infrastructure is sufficient to include the development of up to 48 dwellings in this location. However, the long-term planning for development of this site allows for service providers to ensure investment is directed if needed to meet the needs of a new development. Uncertain Impact (?)
9. Promote Sustainable Communities	The site is located within the built-up area boundary, close adjacent to the existing Bewbush Neighbourhood, with access to the neighbourhood centre, schools, and local health facilities. Significant Positive Impact (++)
10. Encourage Active Lifestyles	The site would result in the loss of an existing small play area; the re-provision of the play area would form part of an acceptable scheme. The site is located close to the existing schools and local health facilities within Bewbush and Crawley town centre. Possible Positive or Slight Positive Impact (?)
Conclusions	Site offers the opportunity to provide additional housing to meet the needs of the growing population of Crawley. The site would also provide opportunities for enhancing the pedestrian and visual connectivity between Crawley and the new Kilnwood Vale neighbourhood.

Assessment of Allocated Housing Sites (Policy H2)

Site Name: Longley Building, Southgate

Site Potential Use: Housing (48 dwellings)

Site Description: The site comprises a vacant office building.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The site represents a sustainable location immediately to the south of the Town Centre. Sustainable design and construction. There are no known issues with regard to noise, air or water pollution Positive Impact (+)
2. Adapt to Climate Change	The site is not within flood zone. Development would have to include suitable proposals for sustainable urban drainage in mitigation. Neutral Impact (/)
3. Protect and/or Enhance the Built Environment	General residential area, new residential properties would be in-keeping with the location. Development of this site would need to take into account the character and appearance of the surrounding residential area, however, good quality design would enhance the quality of the built environment in this location. Positive Impact (+)
4. Decent/Affordable Homes	Could offer approximately 59 new homes. Increasing the capacity of the town to meet some of the need emerging from the population. 40% affordable. Significant Positive Impact (++)
5. Maintain/Support Employment	Provision of new housing is closely linked to supporting economic growth. However, loss of employment land would need to be justified in terms of the site being no longer suitable, viable or appropriate for employment uses and that the loss of floorspace would result in a wider social gain, i.e. provision of affordable housing. Positive Impact (+)
6. Conserve/Enhance Biodiversity and Landscape	The site is currently vacant. Biodiversity enhancements including new landscaping should be designed in to any scheme. Positive Impact (+)
7. Promote Sustainable Journeys	The site is located close to the existing urban area, in a sustainable location to promote public transport use, cycling and walking. Significant Positive Impact (++)
8. Provide Sufficient Infrastructure	As part of the planning application process, it is assumed that the necessary infrastructure will be provided as part of the scheme through either site specific S106 contributions or CIL contributions. Uncertain Impact (?)

SA Objective	Commentary and/or Impact
9. Promote Sustainable Communities	The site is located close to the Town Centre, with good access to schools, public transport and local health facilities. Significant Positive Impact (++)
10. Encourage Active Lifestyles	The site is located within walking distance to Southgate Playing Fields, allowing substantial opportunities for informal recreation. The site is located close to the existing schools and local health facilities within Southgate. Significant Positive Impact (++)
Conclusions	The site is a brownfield site, offering good opportunities for high quality residential development in a sustainable location.

Assessment of Allocated Housing Sites: Town Centre Key Opportunity Sites (Policy H2 and EC6)

Site Name: Telford Place, Three Bridges

Site Potential Use: Housing (99 dwellings) Main Town Centre Uses (mixed use)

Site Description: The site comprises a vacant site previously used as a retail showroom and goods depot

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The site represents a sustainable town centre location. Sustainable design and construction. There are no known issues with regard to noise, air or water pollution, however, the site's previous use means that land contamination may be an issue. Positive Impact (+)
2. Adapt to Climate Change	The site is not within a flood zone. Development would have to include suitable proposals for sustainable urban drainage in mitigation. Neutral Impact (/)
3. Protect and/or Enhance the Built Environment	The site is located within the town centre and mixed use residential development would be in keeping with Local Plan objective of increasing residential development in the Town Centre. Good quality design could enhance the built environment. Positive Impact (+)
4. Decent/Affordable Homes	Could offer approximately 95 new homes. Increasing the capacity of the town to meet some of the need emerging from the population. 40% affordable. Significant Positive Impact (++)
5. Maintain/Support Employment	Provision of new housing is closely linked to supporting economic growth, whilst mixed use development would positively promote economic growth. The ground floor element of the scheme may comprise retail or other main town centre uses. Significant Positive Impact (++)
6. Conserve/Enhance Biodiversity and Landscape	The site is currently vacant. Biodiversity enhancements including new landscaping should be designed in to any scheme. Positive Impact (+)
7. Promote Sustainable Journeys	The site is located within the Town Centre in a sustainable location to promote public transport use, cycling and walking. Development of this site would increase traffic generation – transport modelling work has indicated junction capacity is sufficient for development at this location. Significant Positive Impact (++)
8. Provide Sufficient Infrastructure	As part of the planning application process, it is assumed that the necessary infrastructure will be provided as part of the scheme through either site specific S106 contributions or CIL contributions. Uncertain Impact (?)
9. Promote	The site is located within the built-up area boundary within the Town Centre, with good access to sustainable transport

SA Objective	Commentary and/or Impact
Sustainable Communities	modes, schools and local health facilities. Significant Positive Impact (++)
10. Encourage Active Lifestyles	The site is located within walking distance to Southgate playing fields, allowing substantial opportunities for informal recreation. Significant Positive Impact (++)
Conclusions	The site is a brownfield site, offering good opportunities for high quality residential development in a sustainable location.

Assessment of Allocated Housing Sites: Town Centre Key Opportunity Sites (Policy H2 and EC6)

Site Name: Crawley Station and Car Parks, Northgate

Site Potential Use: Housing (300 dwellings) Main Town Centre Uses (mixed use)

Site Description: The site comprises land currently in use as Crawley rail station and would include the continuing function as a station as part of the overall scheme.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The site represents a highly sustainable Town Centre location. There are no known issues with regard to noise, air or water pollution Positive Impact (+)
2. Adapt to Climate Change	The site is not within flood zone. Development would have to include suitable proposals for sustainable urban drainage in mitigation. Neutral Impact (/)
3. Protect and/or Enhance the Built Environment	The site is located within the town centre and represents an opportunity for main town centre uses and/or residential development. This would be in keeping with Local Plan objective of increasing residential development in the Town Centre. Good quality design could enhance the built environment. Positive Impact (+)
4. Decent/Affordable Homes	Could offer approximately 300 new homes. Increasing the capacity of the town to meet some of the need emerging from the population. 40% affordable. Significant Positive Impact (++)
5. Maintain/Support Employment	Provision of new housing is closely linked to supporting economic growth, whilst mixed use development would positively promote economic growth. The development of the site could provide for mixed uses particularly at ground floor including an enhanced station gateway to the town. Positive Impact (+)
6. Conserve/Enhance Biodiversity and Landscape	Biodiversity enhancements including new landscaping should be designed in to any scheme. Positive Impact (+)
7. Promote Sustainable Journeys	The site is located close to the existing urban area, in a sustainable location to promote public transport use, cycling and walking. Significant Positive Impact (++)
8. Provide Sufficient Infrastructure	As part of the planning application process, it is assumed that the necessary infrastructure will be provided as part of the scheme through site specific S106 contributions. Uncertain Impact (?)

SA Objective	Commentary and/or Impact
9. Promote Sustainable Communities	The site is located close to the Town Centre, with good access to schools, public transport and local health facilities. Significant Positive Impact (++)
10. Encourage Active Lifestyles	The site is located within walking distance to Southgate and West Green Playing Fields, allowing substantial opportunities for informal recreation. The site is located close to the existing schools and local health facilities. Significant Positive Impact (++)
Conclusions	The site is a brownfield site, offering good opportunities for high quality residential development in a sustainable location.

Assessment of Allocated Housing Sites: Town Centre Key Opportunity Sites (Policy H2)

Site Name: County Buildings, Northgate

Site Potential Use: Housing (50 dwellings) Main Town Centre Uses (mixed use)

Site Description: The site comprises land comprises buildings in the ownership of the county council, in temporary use following the ceasing as the town's library.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The site represents a highly sustainable Town Centre location. There are no known issues with regard to noise, air or water pollution Positive Impact (+)
2. Adapt to Climate Change	The site is not within flood zone. Development would have to include suitable proposals for sustainable urban drainage in mitigation. Neutral Impact (/)
3. Protect and/or Enhance the Built Environment	The site is located within the town centre and residential development and/or mixed use would be in keeping with Local Plan objective of increasing residential development in the Town Centre, and enhancing its overall vitality and viability. Good quality design could enhance the built environment. Positive Impact (+)
4. Decent/Affordable Homes	Could offer approximately 50 new homes. Increasing the capacity of the town to meet some of the need emerging from the population. 40% affordable. Significant Positive Impact (++)
5. Maintain/Support Employment	Provision of new housing is closely linked to supporting economic growth whilst mixed use development would positively promote economic growth. The development of the site could provide for commercial/retail uses at ground floor. Positive Impact (+)
6. Conserve/Enhance Biodiversity and Landscape	Biodiversity enhancements including new landscaping should be designed in to any scheme. Positive Impact (+)
7. Promote Sustainable Journeys	The site is located close to the existing urban area, in a sustainable location to promote public transport use, cycling and walking. Significant Positive Impact (++)
8. Provide Sufficient Infrastructure	As part of the planning application process, it is assumed that the necessary infrastructure will be provided as part of the scheme through site specific S106 contributions. Uncertain Impact (?)

SA Objective	Commentary and/or Impact
9. Promote Sustainable Communities	The site is located close to the Town Centre, with good access to schools, public transport and local health facilities. Significant Positive Impact (++)
10. Encourage Active Lifestyles	The site is located within walking distance to Southgate and West Green Playing Fields, allowing substantial opportunities for informal recreation. The site is located close to the existing schools and local health facilities. Significant Positive Impact (++)
Conclusions	The site is a brownfield site, offering good opportunities for high quality residential development in a sustainable location.

Assessment of Allocated Housing Sites: Town Centre Key Opportunity Sites (Policy H2 and EC6)

Site Name: Land North of the Boulevard, Northgate

Site Potential Use: Housing (50 dwellings)

Site Description: The site comprises land to the north of the town centre's primary shopping area.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The site represents a highly sustainable Town Centre location. There are no known issues with regard to noise, air or water pollution Positive Impact (+)
2. Adapt to Climate Change	The site is not within flood zone. Development would have to include suitable proposals for sustainable urban drainage in mitigation. Neutral Impact (/)
3. Protect and/or Enhance the Built Environment	The site is located within the town centre and residential and/or mixed use development would be in keeping with Local Plan objective of increasing residential development in the Town Centre and promoting its overall vitality and viability. Good quality design could enhance the built environment. Positive Impact (+)
4. Decent/Affordable Homes	Could offer approximately 50 new homes. Increasing the capacity of the town to meet some of the need emerging from the population. 40% affordable. Significant Positive Impact (++)
5. Maintain/Support Employment	Provision of new housing is closely linked to supporting economic growth, whilst mixed use development would positively promote economic growth. The development of the site could provide for commercial/retail uses at ground floor. Positive Impact (+)
6. Conserve/Enhance Biodiversity and Landscape	Biodiversity enhancements including new landscaping should be designed in to any scheme. Positive Impact (+)
7. Promote Sustainable Journeys	The site is located close to the existing urban area, in a sustainable location to promote public transport use, cycling and walking. Significant Positive Impact (++)
8. Provide Sufficient Infrastructure	As part of the planning application process, it is assumed that the necessary infrastructure will be provided as part of the scheme through site specific S106 contributions. Uncertain Impact (?)
9. Promote	The site is located close to the Town Centre, with good access to schools, public transport and local health facilities.

SA Objective	Commentary and/or Impact
Sustainable Communities	Significant Positive Impact (++)
10. Encourage Active Lifestyles	The site is located within walking distance to Southgate and West Green Playing Fields, allowing substantial opportunities for informal recreation. The site is located close to the existing schools and local health facilities. Significant Positive Impact (++)
Conclusions	The site is a brownfield site, offering good opportunities for high quality residential development in a sustainable location.

Assessment of Broad Locations for Housing Development (Policy H2)

Name: Residual Land at Forge Wood, Pound Hill

Potential Use: Housing (150 homes)

Description: Existing allocation as a comprehensive mixed use neighbourhood to the North of the A2011 within Pound Hill. The site comprises a mixture of land uses including open countryside, crematorium, residential and farm dwellings and gas holder. The two residual areas of land are those areas at Steers Lane and Heathy Farm which form part of the neighbourhood allocation but do not benefit from planning permission.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	Whilst relatively remote from existing neighbourhoods, the sites offer the most sequentially preferable neighbourhood extension to Pound Hill to provide a comprehensive mixed use neighbourhood, neighbourhood centre, local employment, primary school and doctor's surgery. Sustainable design and construction. Uncertain Impact (?)
2. Adapt to Climate Change	Site is adjacent to but not within flood zone. Would reduce permeable surfacing and increase significant increases in hard surface area, increasing surface water runoff. Development would have to include suitable proposals for sustainable urban drainage in mitigation. Neutral Impact (/)
3. Protect and/or Enhance the Built Environment	The site and surrounding development comprises a largely greenfield extension to Crawley to provide a new neighbourhood, as such, the development would be fundamentally different to the existing character of the area as open countryside and farmland with areas of previously developed land. Development of the site would alter the countryside setting of the locality and setting of existing residential properties immediately adjacent to the site at Tinsley Green. However, the approved masterplan contains large areas of open space and woodland which partly mitigates the land take associated with the built elements of the development. Negative Impact (-)
4. Decent/Affordable Homes	Could offer up to 150 new homes, significantly increasing the capacity of the town to meet some of the need emerging from the population. 40% affordable. Significant Positive Impact (++)
5. Maintain/Support Employment	The rest of the neighbourhood contains local employment provision linked both to the neighbourhood centre and bespoke provision to support economic growth. Significant Positive Impact (++)
6. Conserve/Enhance Biodiversity and Landscape	Sites are currently open fields and woodland and as such, there is substantial tree cover across a large proportion of both sites with mature tree lines running along the eastern and southern boundary with the road. A number of trees on the Steers Lane site are protected and would have to be maintained as part of the design and layout of the development. The tree buffer along the southern boundary of the Heathy Farm site comprises structural landscaping and these would similarly have to be maintained in the development of this site. Further biodiversity enhancements will also be designed

SA Objective	Commentary and/or Impact
	in to any scheme. Possible Positive or Slight Positive Impact (+?)
7. Promote Sustainable Journeys	The site is located within the Built-Up Area Boundary and is physically distant from existing neighbourhoods and employment locations. However, public transport connections and cycling are integral to the new neighbourhood. Uncertain impact (?)
8. Provide Sufficient Infrastructure	As part of the planning application process, it is assumed that the necessary infrastructure will be provided as part of the scheme through either site specific S106 contributions or CIL contributions. Uncertain Impact (?)
9. Promote Sustainable Communities	Both sites are to be developed as part of a mixed use neighbourhood and comprises a range of related land uses including primary school, doctor's surgery, employment land and located within the built-up area boundary, close adjacent to the existing Bewbush Neighbourhood, with access to the neighbourhood centre, schools, and local health facilities. Significant Positive Impact (++)
10. Encourage Active Lifestyles	The site would result in the loss of open countryside and informal recreational space. However, the remainder of the North East Sector development provides for large areas of planned open space including locally equipped areas of play, school playing fields, playing fields, cycle routes and allotments. It is therefore considered the approved layout and design of the new neighbourhood will fully encourage active lifestyles. Positive Impact (+)
Conclusions	The sites offer the opportunity to provide additional housing to meet the needs of the growing population of Crawley. They form part of an existing housing allocation and the new neighbourhood will be well provided with new recreation/sports facilities.

Assessment of Broad Locations for Housing Development (Policy H2)

Name: Town Centre (land outside the allocated H2 Sites)

Potential Use: Housing (156 homes)

Description: This broad location comprises a number of sites within the Town Centre boundary, but outside those allocated through Policy H2, as detailed in the Housing Trajectory. The sites are all previously developed land and include surplus car parking and buildings.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The area represents a highly sustainable Town Centre location. There are no known issues with regard to noise, air or water pollution Positive Impact (+)
2. Adapt to Climate Change	The site is not within flood zone. Development would have to include suitable proposals for sustainable urban drainage in mitigation. Neutral Impact (/)
3. Protect and/or Enhance the Built Environment	The site is located within the town centre and residential development would be in keeping with Local Plan objective of increasing residential development in the Town Centre. Good quality design could enhance the built environment. Positive Impact (+)
4. Decent/Affordable Homes	Could offer approximately 156 new homes. Increasing the capacity of the town to meet some of the need emerging from the population. 40% affordable. Significant Positive Impact (++)
5. Maintain/Support Employment	Provision of new housing is closely linked to supporting economic growth. The development of the site could provide for commercial/retail uses at ground floor. However, loss of employment land would still need to be justified in terms of the site being no longer suitable, viable or appropriate for employment uses and that the loss of floorspace would result in a wider social gain, i.e. provision of affordable housing. Positive Impact (+)
6. Conserve/Enhance Biodiversity and Landscape	Biodiversity enhancements including new landscaping should be designed in to any scheme. Positive Impact (+)
7. Promote Sustainable Journeys	The site is located close to the existing urban area, in a sustainable location to promote public transport use, cycling and walking. Significant Positive Impact (++)
8. Provide Sufficient	As part of the planning application process, it is assumed that the necessary infrastructure will be provided as part of the number of schemes proposed either through site specific S106 contributions or CIL contributions. Uncertain Impact (?)

SA Objective	Commentary and/or Impact
Infrastructure	
9. Promote Sustainable Communities	The site is located close to the Town Centre, with good access to schools, public transport and local health facilities. Significant Positive Impact (++)
10. Encourage Active Lifestyles	The site is located within walking distance to Southgate and West Green Playing Fields, allowing substantial opportunities for informal recreation. The site is located close to the existing schools and local health facilities. Significant Positive Impact (++)
Conclusions	The area comprises a number of brownfield sites, offering good opportunities for high quality residential development in a sustainable location.

Assessment of Broad Locations for Housing Development (Policy H2)

Name: Land East of London Road

Potential Use: Housing (171 homes)

Description: This broad location comprises a number of sites to the east of London Road in Northgate as detailed in the Housing Trajectory. The sites are all residential properties with garden land.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The area represents a sustainable location within an established neighbourhood. There are no known issues with regard to noise, air or water pollution Positive Impact (+)
2. Adapt to Climate Change	The site is not within flood zone. Development would have to include suitable proposals for sustainable urban drainage in mitigation. Neutral Impact (/)
3. Protect and/or Enhance the Built Environment	The site is located within an existing neighbourhood and residential development would be in keeping with Local Plan objective of increasing residential development within existing neighbourhoods. Good quality design could enhance the built environment. Positive Impact (+)
4. Decent/Affordable Homes	Could offer approximately 171 new homes. Increasing the capacity of the town to meet some of the need emerging from the population. 40% affordable. Significant Positive Impact (++)
5. Maintain/Support Employment	Provision of new housing is closely linked to supporting economic growth. The development of the site could provide for commercial/retail uses at ground floor. However, loss of employment land would still need to be justified in terms of the site being no longer suitable, viable or appropriate for employment uses and that the loss of floorspace would result in a wider social gain, i.e. provision of affordable housing. Positive Impact (+)
6. Conserve/Enhance Biodiversity and Landscape	Biodiversity enhancements including new landscaping should be designed in to any scheme. Positive Impact (+)
7. Promote Sustainable Journeys	The site is located close to the existing urban area, in a sustainable location to promote public transport use, cycling and walking. Significant Positive Impact (++)
8. Provide Sufficient	As part of the planning application process, it is assumed that the necessary infrastructure will be provided as part of the number of schemes proposed either through site specific S106 contributions or CIL contributions. Uncertain Impact (?)

SA Objective	Commentary and/or Impact
Infrastructure	
9. Promote Sustainable Communities	The site is located within walking distance of the Town Centre, with good access to schools, public transport and local health facilities. Significant Positive Impact (++)
10. Encourage Active Lifestyles	The site is located within walking distance to Northgate Playing Fields, allowing substantial opportunities for informal recreation. The site is located close to the existing schools and local health facilities. Significant Positive Impact (++)
Conclusions	The area comprises a number of brownfield sites, offering good opportunities for high quality residential development in a sustainable location.

Assessment of Potential Areas of Search

Name: Land north of Langley Lane

Potential Use: Housing

Description: The land is located to the east of Fir Tree Close and directly to the north of Langley Walk and is owned wholly by the Council. Vehicle access onto the land currently exists from Langley Walk. The land is also in close proximity to Langley Parade, Langley Green's neighbourhood centre.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The area's location, although just outside the BUAB, is in relatively close proximity to local schools, a GP surgery and other community facilities such as Langley Parade. This will reduce the need to travel by car substantially. Since the land is adjacent to the urban area, both pedestrian networks and public transport are readily accessible. In terms of noise pollution, the land would be acceptable in terms of the noise contours for a single runway, however, for a two runway scenario, some of the land is located on the 63-66dBA noise contour which would mean that noise issues would need to be carefully considered and mitigated. There is an existing access onto the land but this will need to be assessed and most likely improved. The site is unlikely to be contaminated, although this will also need to be assessed on site. Uncertain impact (?)
2. Adapt to Climate Change	Whilst the site is not within a floodplain, it is prone to flooding and drainage issues would need to be carefully considered. Any proposed access and requirement for hard standing will mean that some permeable land will be lost. Uncertain impact (?)
3. Protect and/or Enhance the Built Environment	The site is sufficiently separate from the main residential area. Suitable layout, screening and landscaping of the site would minimise the visual impact of the site. Neutral Impact (/)
4. Decent/Affordable Homes	Development on this site would provide accommodation for existing and future residents Significant Positive Impact (++)
5. Maintain/Support Employment	Any future development on the site may have small economic benefits since the occupants would contribute towards local community businesses. Possible Positive or Slight Positive Impact (+?)
6. Conserve/Enhance Biodiversity and	Outside the built up area boundary: Immediately adjacent to the urban area; suburban cul-de-sac to the west. Field in equestrian use to the east of the site, with some stabling and associated buildings present. Further east land in urban/suburban public recreation use. To the north – open countryside and site of nature conservation.

SA Objective	Commentary and/or Impact
Landscape	The impact of residential development on biodiversity and landscape remains unknown Uncertain Impact (?)
7. Promote Sustainable Journeys	Access is likely to be difficult along Langley Walk but this will need to be assessed by the Local Highway Authority. As previously stated, the site is in close proximity to the neighbourhood centre, which is a substantial positive. Uncertain Impact (?)
8. Provide Sufficient Infrastructure	Access and highway capacity issues remain unknown at this stage. Detailed assessment of other infrastructure needs (sewerage, education, drainage) has not been considered Uncertain Impact (+?)
9. Promote Sustainable Communities	The site is located in reasonably close proximity to the neighbourhood centre, the Langley Parade (approximately 0.5km), and moreover, it is in reasonably close proximity to local schools also. Positive Impact (+)
10. Encourage Active Lifestyles	The development of this site would result in the loss of open space, but not of public formal or informal sports playing pitches. The site is located within a reasonable walking distance to the local primary school and GP surgery. In addition, the site also has space to provide amenity land within the site, in addition to private garden space. The resultant effect of this could be positive for the community. It would also ensure existing playing fields within the urban area are not required for such site provision/development. The site is very close to the Cherry Lane Playing Fields, which offers a number of open space recreation uses, and the Willoughby Fields playing fields – including rugby provision. It is also close to the Local Nature Reserve and offers good access to the open countryside. Significant Positive Impact (++)
Conclusions	This site is identified as a broad area of search in the Local Plan and further work would be required before the land could be identified as being suitable for development. Particular issues which would need to be addressed include flooding, noise and transport.

Assessment of Potential Areas of Search

Name: Land North of the North East Sector

Potential Allocation: Housing

Description: the site is located beyond the Built-Up Area boundary to the north of the North East Sector, within a countryside location.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The site would be located within the noise contours associated with a single as well as second runway at the airport. The site sits within the 57 and 60dB(A) predicted aircraft noise contours for a single runway (Gatwick Master Plan, July 2012) and between the 66 and 69dB(A) predicted noise contours for a twin runway. The site would therefore only be suitable for residential development under a single runway scenario. Uncertain Impact (?)
2. Adapt to Climate Change	The site is currently greenfield, development of this site would increase hard surfacing; however mitigation could be designed in. Neutral Impact (/)
3. Protect and/or Enhance the Built Environment	The site is located outside the built up area. Uncertain Impact (?)
4. Decent/Affordable Homes	Could offer a substantial proportion of new homes. Increasing the capacity of the town to meet some of the need emerging from the population and would include 40% affordable. Significant Positive Impact (++)
5. Maintain/Support Employment	Whilst the provision of new housing is closely linked to supporting economic growth, this site is located within the land safeguarded for Gatwick Airport potential expansion. Significant Negative Impact (--)
6. Conserve/Enhance Biodiversity and Landscape	The site is located outside of the built up area boundary in the countryside, within the North East Crawley Rural Fringe. A significant proportion of the site is Ancient Woodland Significant Negative Impact (--)
7. Promote Sustainable Journeys	The site is located outside the urban area. Negative Impact (-)
8. Provide Sufficient Infrastructure	The site is currently located away from the existing established residential area, however the development of North East Sector would reduce this distance. Uncertain Impact (?)

SA Objective	Commentary and/or Impact
9. Promote Sustainable Communities	The site is currently located away from the existing established residential area, however the development of the North East Sector would reduce this distance. Uncertain Impact (?)
10. Encourage Active Lifestyles	This site is currently located away from the existing neighbourhood with limited access to facilities and services, however the development of North East Sector would reduce this distance. Uncertain Impact (?)
Conclusions	The site lies within the safeguarding area for Gatwick Airport and within the existing and proposed noise contours for the airport, therefore it would not be appropriate to develop for housing at this stage. In addition, the site is located within the countryside, outside the built up area boundary and is currently disconnected from the residential area. A large proportion of the site is Ancient Woodland.

Assessment of Rejected Sites

Name: East of Brighton Road

Site Potential Use: Housing

Description: Countryside location. Greenfield. South of the borough, adjacent to the junction with the M23/A23. Majority of the land is in the Forestry Commission ownership with an element of private ownership adjacent to A23.

To the south west of Tilgate Park in the south of the borough is an area of countryside and mature woodland, identified at the Tilgate/Worth Forest Rural Fringe in submission Local Plan Policy CH9. It is largely separate from Crawley's urban area. The land abuts the A23 to the west, with the junction with the A264 to the south west. The East of Brighton Road site had been considered as a potential housing and employment location in the Core Strategy (2008), given the existing Tilgate Business Park, adjacent, which represents an established employment location comprising a cluster of good quality office accommodation. The site was also suggested at preferred strategy consultation stage (2012) as potential for Employment or Housing, and was subject to public consultation during the Additional Sites consultation (2013).

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The area is heavily wooded and is an SNCI and a Biodiversity Opportunity Area, with some areas of ancient woodland. Main access to any development would need to be considered off the M23 or A23 and would be a considerable distance from Crawley's neighbourhoods and local facilities by foot or cycle. The private car represents the most likely means of access, negatively impacting on pollution and climate change. The loss of greenspace and woodland would also negatively impact on climate change and pollution mitigation. The location away from the majority of public transport and other larger urban areas is considered unsustainable. Significant Negative Impact (--)
2. Adapt to Climate Change	The loss of trees, natural surrounds and loss of greenspace means there would be a negative impact on adaptation to climate change. Significant Negative Impact (--)
3. Protect and/or Enhance the Built Environment	The allocation of the site for housing would help meet unmet needs. However, the area forms an important element of the town's structural landscaping and provides an attractive setting for the southern neighbourhoods. Long distance views towards the area from various viewpoints within the built up area, as protected by submission Local Plan Policy CH8, would be adversely affected by development. Therefore, the high value of the contribution this area makes to the surrounding built environment would outweigh the benefits of any housing delivery. In this regard, identification of East of Brighton Road is viewed as having a negative impact. Negative Impact (-)
4. Decent/Affordable Homes	The identification of the site for housing would increase the delivery of housing, to meet housing needs and would include a proportion of affordable homes. Significant Positive Impact (++)

SA Objective	Commentary and/or Impact
5. Maintain/ Support Employment	The allocation of this site for housing would not support permanent employment provision (other than through the construction of the development). However, the provision of housing is closely linked to economic growth. Negative Impact (-)
6. Conserve/ Enhance Biodiversity and Landscape	East of Brighton Road is situated outside the Built-Up Area Boundary, within an area of countryside and mature woodland, including areas of ancient woodland. The site is identified as an area of Structural Landscaping, and the area is designated as an SNCI and a Biodiversity Opportunity Area. Identification of the site as a housing site will significantly adversely impact on the objective to conserve and enhance biodiversity, and will detract from its value as an area of structural landscaping. Significant Negative Impact (--)
7. Promote Sustainable Journeys	Identification of East of Brighton Road as a housing site would lead to car borne journeys, as the majority of the site is not accessible from Crawley's neighbourhoods on foot and bus. Main access to any development would be from the A23 or M23 and, therefore, it is likely that car access would be dominant. The site is unlikely to be large enough to provide facilities or services to support local residents. Significant Negative Impact (--)
8. Provide Sufficient Infrastructure	East of Brighton Road is a large area currently undeveloped, with considerable environmental constraints. Further infrastructure will be required to serve the site and at this time there is no evidence that this can/would be provided or sufficient. Uncertain Impact (?)
9. Promote Sustainable Communities	Identification of East of Brighton Road for housing will increase the delivery of housing, but at the expense of a significant greenspace as well as including important environmental features. The site is disconnected from the two closest neighbourhoods and private car represents the most likely means of access. The site is unlikely to be large enough to provide facilities or services to support local residents, increasing the need to travel. Negative Impact (-)
10. Encourage Active Lifestyles	The loss of open space and recreational opportunities for walking and cycling in this area, which acts as an extension to Tilgate Country Park would undermine the encouragement of active lifestyles. Significant Negative Impact (--)
Conclusions	The allocation of the site as a housing site and the provision of dwellings needs to be considered against the significant negative impact its development would have on one of the most important environmental assets in the borough. The site is also disconnected from the southern neighbourhoods and is unlikely to be able to support local facilities for residents so it would not be a sustainable development.

Assessment of Rejected Sites

Name: Tilgate Country Park

Site Potential Use: Housing

Description: Countryside location. Greenfield. South of the borough, adjacent to Tilgate, Furnace Green and Maidenbower neighbourhoods abutting the M23. Land in council ownership.

To the south of the borough is Tilgate Park, an area of countryside and mature woodland, with a golf course, lake and recreational facilities and open space. Identified at the Tilgate/Worth Forest Rural Fringe in submission Local Plan Policy CH9, it is largely separate from Crawley's urban area. The land abuts the Tilgate Forest Business Park to the west, the M23 to the east at its junction with the A264.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The Tilgate Country Park is heavily wooded, with areas of ancient woodland. Development would lead to a significant loss of trees, negatively impacting on climate change. The site is an SNCI and a Biodiversity Opportunity Area, and has areas designated as historic park and garden, as well as significant water features such as Tilgate Lake and Titmus Lake. Main access to any development would need to be considered off the M23 or A23. The part of the site accessible on foot to the southern neighbourhoods of Tilgate and Furnace Green and Maidenbower, to the east, is an important recreational/open green space asset for the borough. The southern parts of the site are located adjacent to the M23/A23 meaning that the private car represents the most likely means of access to these areas, negatively impacting on pollution and climate change. The loss of greenspace and woodland would also negatively impact on pollution and climate change. Significant Negative Impact (--)
2. Adapt to Climate Change	The loss of trees, natural surrounds and loss of significant and high quality greenspace means there would be a negative impact on adaptation to climate change. Development is also likely to adversely affect the important role the lakes form in the Upper Mole Flood Alleviation Scheme. Significant Negative Impact (--)
3. Protect and/or Enhance the Built Environment	The allocation of Tilgate Country Park as a housing site would help meet unmet needs. However, the area forms an important element of the town's structural landscaping and provides an attractive setting for the southern neighbourhoods. Long distance views towards the area from various viewpoints within the built up area, as protected by submission Local Plan Policy CH8, would be adversely affected by development. There are also a few historic buildings within the area that are important in the historic parkland and are protected as part of the Local Plan. Therefore, the high value of the contribution this area makes to the surrounding built environment would outweigh the benefits of any housing delivery. Significant Negative Impact (--)

SA Objective	Commentary and/or Impact
4. Decent/ Affordable Homes	The identification of the site for housing would increase the delivery of housing, to meet housing needs and would include a proportion of affordable homes. Significant Positive Impact (++)
5. Maintain/ Support Employment	The allocation of this site for housing would not support permanent employment provision (other than through the construction of the development). However, the provision of housing is closely linked to economic growth. Negative Impact (-)
6. Conserve/ Enhance Biodiversity and Landscape	Tilgate Country Park is situated outside the Built-Up Area Boundary, within an area of countryside and mature woodland, including areas of ancient woodland. It is identified as an area of Structural Landscaping, and is designated as an SNCI and a Biodiversity Opportunity Area. Identification of the site as a housing site will significantly adversely impact on the objective to conserve and enhance biodiversity, and will detract from its value as an area of structural landscaping. Significant Negative Impact (--)
7. Promote Sustainable Journeys	The northern and eastern parts of Tilgate Country Park are adjacent to the Tilgate, Furnace Green and Maidenbower neighbourhoods so some areas of the site could be accessible to local facilities on foot, or cycle. The main access to the site is likely to be from the A23 or M23 by car, increasing car borne journeys, as the majority of the site is not accessible from Crawley's neighbourhoods on foot and bus. Negative Impact (-)
8. Provide Sufficient Infrastructure	Tilgate Country Park is a large area currently undeveloped, with considerable environmental constraints. Further infrastructure will be required to serve the site and at this time there is no evidence that this can/would be provided or sufficient. Uncertain Impact (?)
9. Promote Sustainable Communities	Identification of Tilgate Country Park as a housing site will increase the delivery of housing, but at the expense of a significant greenspace that is the most important outdoor recreational space in the borough, as well as including important environmental features and historic buildings. The site may be large enough to provide some local facilities for new residents, although it is unlikely to be large enough for sufficient houses to support a primary school. Private car represents the most likely means of access, increasing the need to travel. Negative Impact (-)
10. Encourage Active Lifestyles	Tilgate Country Park is one of the most important recreational assets in the borough, with facilities including a golf course, driving range, Go Ape, watersports, extensive walking and running routes, cycle and mountain bike routes, bridleways, nature centre and an outdoor gym. It is also in close proximity to the K2 Crawley leisure centre, Broadfield Stadium pitches and the wider countryside in the AONB to the south. Its development would undermine the encouragement of active lifestyles. Significant Negative Impact (--)
Conclusions	The allocation of the site as a housing site and the provision of dwellings needs to be considered against the significant negative impact its development would have on one of the most important environmental assets in the borough.

Assessment of Rejected Sites

Site Name: Stephenson Way Industrial Area: Site 1

Site Potential Allocation: Housing

Site Description: Previously developed land within the urban area. Located within a main employment area and forms part of Three Bridges Corridor, an area identified for mixed use (employment and residential) within the adopted Core Strategy.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	Land contamination and remediation issues likely. Uncertain Impact (?)
2. Adapt to Climate Change	The site falls within the functional floodplain (zones 2 and 3) Uncertain Impact (?)
3. Protect and/or Enhance the Built Environment	Detailed assessment of this site would be required to ascertain whether limited intensification may be acceptable providing the impact on existing neighbouring industrial uses and parking can be adequately addressed. Uncertain Impact (?)
4. Decent/Affordable Homes	Could offer a substantial proportion of new homes. Increasing the capacity of the town to meet some of the need emerging from the population and would include 40% affordable. Significant Positive Impact (++)
5. Maintain/Support Employment	Whilst the provision of new housing is closely linked to supporting economic growth, the development of this site would result in the loss of existing employment land. The Economic Growth Assessment (EGA) clearly indicated a need for the retention of the employment land within the main employment areas. Significant Negative Impact (--)
6. Conserve/Enhance Biodiversity and Landscape	The site is urban, industrial in nature. Remediation of the site and improvements for residential may be able to enhance biodiversity in this location, but the type of development which could be suitable is likely to be higher density leading to a greater level of hard surfacing than would be the case for lower density residential, particularly if contamination issues are identified. Uncertain Impact (?)
7. Promote Sustainable Journeys	The site is located within the urban area, close to Three Bridges Station, Three Bridges Neighbourhood Centre and Crawley Town Centre. But access to the site and parking issues are currently unknown. Uncertain Impact (?)
8. Provide Sufficient Infrastructure	The site is currently served by existing infrastructure services. However, the infrastructure costs associated with the relocation of the overhead electricity pylons are unknown, however, it is anticipated this would be likely to be significant. Uncertain Impact (?)

SA Objective	Commentary and/or Impact
9. Promote Sustainable Communities	The site is within an industrial employment area, rather than an established residential area. It is close to the neighbourhood centre of Three Bridges and close to Crawley Town Centre. Access to the site and parking issues are currently unknown. Uncertain Impact (?)
10. Encourage Active Lifestyles	Uncertain Impact (?)
Conclusions	The loss of the employment land within one of the town's important main employment areas would be contrary to the evidence provided by the EGA.

Assessment of Rejected Sites

Site Name: Stephenson Way Industrial Area: Site 2

Site Potential Allocation: Housing

Site Description: Previously developed land within the urban area. Located within a main employment area and forms part of Three Bridges Corridor, an area identified for mixed use (employment and residential) within the adopted Core Strategy.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	Land contamination and remediation issues likely. Uncertain Impact (?)
2. Adapt to Climate Change	The site falls within the functional floodplain (zones 2 and 3) Uncertain Impact (?)
3. Protect and/or Enhance the Built Environment	Detailed assessment of this site would be required to ascertain whether limited intensification may be acceptable providing the impact on existing neighbouring industrial uses and parking can be adequately addressed. Uncertain Impact (?)
4. Decent/Affordable Homes	Could offer a substantial proportion of new homes. Increasing the capacity of the town to meet some of the need emerging from the population and would include 40% affordable. Significant Positive Impact (++)
5. Maintain/Support Employment	Whilst the provision of new housing is closely linked to supporting economic growth, the development of this site would result in the loss of existing employment land. The Economic Growth Assessment (EGA) clearly indicated a need for the retention of the employment land within the main employment areas. Significant Negative Impact (--)
6. Conserve/Enhance Biodiversity and Landscape	The site is urban, industrial in nature. Remediation of the site and improvements for residential may be able to enhance biodiversity in this location, but the type of development which could be suitable is likely to be higher density leading to a greater level of hard surfacing than would be the case for lower density residential, particularly if contamination issues are identified. Uncertain Impact (?)
7. Promote Sustainable Journeys	The site is located within the urban area, close to Three Bridges Station, Three Bridges Neighbourhood Centre and Crawley Town Centre. But access to the site and parking issues are currently unknown. Uncertain Impact (?)
8. Provide Sufficient Infrastructure	The site is currently served by existing infrastructure services. However, the infrastructure costs associated with the relocation of the overhead electricity pylons are unknown, however, it is anticipated this would be likely to be significant. Uncertain Impact (?)

SA Objective	Commentary and/or Impact
9. Promote Sustainable Communities	The site is within an industrial employment area, rather than an established residential area. It is close to the neighbourhood centre of Three Bridges and close to Crawley Town Centre. Access to the site and parking issues are currently unknown. Uncertain Impact (?)
10. Encourage Active Lifestyles	Uncertain Impact (?)
Conclusions	The loss of the employment land within one of the town's important main employment areas would be contrary to the evidence provided by the EGA.

Assessment of Rejected Sites

Site Name: Stephenson Way Industrial Area: Site 3

Site Potential Allocation: Housing

Site Description: Previously developed land within the urban area. Located within a main employment area and forms part of Three Bridges Corridor, an area identified for mixed use (employment and residential) within the adopted Core Strategy.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	Land contamination and remediation issues likely. Uncertain Impact (?)
2. Adapt to Climate Change	The site falls within the functional floodplain (zones 2 and 3) Uncertain Impact (?)
3. Protect and/or Enhance the Built Environment	Detailed assessment of this site would be required to ascertain whether limited intensification may be acceptable providing the impact on existing neighbouring industrial uses and parking can be adequately addressed. Uncertain Impact (?)
4. Decent/Affordable Homes	Could offer a substantial proportion of new homes. Increasing the capacity of the town to meet some of the need emerging from the population and would include 40% affordable. Significant Positive Impact (++)
5. Maintain/Support Employment	Whilst the provision of new housing is closely linked to supporting economic growth, the development of this site would result in the loss of existing employment land. The Economic Growth Assessment (EGA) clearly indicated a need for the retention of the employment land within the main employment areas. Significant Negative Impact (--)
6. Conserve/Enhance Biodiversity and Landscape	The site is urban, industrial in nature. Remediation of the site and improvements for residential may be able to enhance biodiversity in this location, but the type of development which could be suitable is likely to be higher density leading to a greater level of hard surfacing than would be the case for lower density residential, particularly if contamination issues are identified. Uncertain Impact (?)
7. Promote Sustainable Journeys	The site is located within the urban area, close to Three Bridges Station, Three Bridges Neighbourhood Centre and Crawley Town Centre. But access to the site and parking issues are currently unknown. Uncertain Impact (?)
8. Provide Sufficient Infrastructure	The site is currently served by existing infrastructure services. However, the infrastructure costs associated with the relocation of the overhead electricity pylons are unknown, however, it is anticipated this would be likely to be significant. Uncertain Impact (?)

SA Objective	Commentary and/or Impact
9. Promote Sustainable Communities	The site is within an industrial employment area, rather than an established residential area. It is close to the neighbourhood centre of Three Bridges and close to Crawley Town Centre. Access to the site and parking issues are currently unknown. Uncertain Impact (?)
10. Encourage Active Lifestyles	Uncertain Impact (?)
Conclusions	The loss of the employment land within one of the town's important main employment areas would be contrary to the evidence provided by the EGA.

Assessment of Rejected Sites

Site Name: Three Bridges Station (car park to rear)

Site Potential Allocation: Housing

Site Description: Previously developed land within the urban area. Located within a main employment area and forms part of Three Bridges Corridor, an area identified for mixed use (employment and residential) within the adopted Core Strategy.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	Unknown land contamination issues. Uncertain Impact (?)
2. Adapt to Climate Change	The site falls within the functional floodplain (zones 2 and 3) Uncertain Impact (?)
3. Protect and/or Enhance the Built Environment	Detailed assessment of this site would be required to ascertain whether limited intensification may be acceptable providing the impact on existing neighbouring industrial uses and parking can be adequately addressed. Uncertain Impact (?)
4. Decent/Affordable Homes	Could offer a substantial proportion of new homes. Increasing the capacity of the town to meet some of the need emerging from the population and would include 40% affordable. Significant Positive Impact (++)
5. Maintain/Support Employment	Whilst the provision of new housing is closely linked to supporting economic growth, the development of this site would result in the loss of existing employment land. The Economic Growth Assessment (EGA) clearly indicated a need for the retention of the employment land within the main employment areas. Significant Negative Impact (--)
6. Conserve/Enhance Biodiversity and Landscape	The site is urban, industrial in nature. Remediation of the site and improvements for residential may be able to enhance biodiversity in this location, but the type of development which could be suitable is likely to be higher density leading to a greater level of hard surfacing than would be the case for lower density residential, particularly if contamination issues are identified. Uncertain Impact (?)
7. Promote Sustainable Journeys	The site is located within the urban area, close to Three Bridges Station, Three Bridges Neighbourhood Centre and Crawley Town Centre. But access to the site and parking issues are currently unknown. Uncertain Impact (?)
8. Provide Sufficient Infrastructure	The site is currently served by existing infrastructure services. Uncertain Impact (?)

SA Objective	Commentary and/or Impact
9. Promote Sustainable Communities	The site is within an industrial employment area, rather than an established residential area. It is close to the neighbourhood centre of Three Bridges and close to Crawley Town Centre. Access to the site and parking issues are currently unknown. Uncertain Impact (?)
10. Encourage Active Lifestyles	Uncertain Impact (?)
Conclusions	The loss of the employment land within one of the town's important main employment areas would be contrary to the evidence provided by the EGA. However, the site would form a sustainable location for housing, immediately adjacent to the Three Bridges Mainline Station. The availability of the site for development was not supported by the landowner at the Additional Sites consultation stage.

Assessment of Rejected Sites

Site Name: Cherry Lane Playing Fields

Site Potential Allocation: Housing

Site Description: Playing Fields, within the Built-Up Area boundary, located to the north of the residential neighbourhood of Langley Green, west of Manor Royal.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The playing fields would be located within the noise contours associated with a second runway at the airport, and would need to be considered in design and mitigation of any properties. Negative Impact (-)
2. Adapt to Climate Change	The site is currently Greenfield, development of this site would increase hard surfacing; however mitigation could be designed in. Neutral Impact (/)
3. Protect and/or Enhance the Built Environment	Detailed assessment of this site would be required to ascertain whether limited intensification may be acceptable providing the impact on neighbour amenity, street scene, trees, character of the area and parking can be adequately addressed. Uncertain Impact (?)
4. Decent/Affordable Homes	Could offer a substantial proportion of new homes. Increasing the capacity of the town to meet some of the need emerging from the population and would include 40% affordable. Significant Positive Impact (++)
5. Maintain/Support Employment	The provision of new housing is closely linked to supporting economic growth. Significant Positive Impact (++)
6. Conserve/Enhance Biodiversity and Landscape	The site is short mown grass playing fields, adjacent to an area of Ancient Woodland, development of this site for residential could open up the access to the woodlands for the purposes of informal recreation. Development of this site would result in the loss of Greenfield land, however, any residential scheme would incorporate biodiversity enhancements. The site forms part of the town's access to the countryside and is immediately adjacent to the Upper Mole Farmlands Landscape Character Area. Uncertain Impact (?)
7. Promote Sustainable Journeys	The site is located within the urban area. But detailed access to the site and parking issues are currently unknown. Uncertain Impact (?)
8. Provide Sufficient	The site is located adjacent to the existing residential properties which are served by existing infrastructure services. Uncertain Impact (?)

SA Objective	Commentary and/or Impact
Infrastructure	
9. Promote Sustainable Communities	The site is adjacent to an established residential area. Vehicular access to the site is currently considered to be limited. Negative Impact (-)
10. Encourage Active Lifestyles	Development of the site would result in the loss of playing fields in a location which has been identified in the Open Space Study review as being of high quality 'hub' potential. Significant Negative Impact (--)
Conclusions	The results of the open space study, identifying the potential for this site to form a hub recreation site, results in the site not being considered surplus to requirements, and therefore would not be appropriate to develop. In addition the constraints in relation to access would also limit the site's potential.

Assessment of Rejected Sites

Site Name: Land at Poles Lane

Site Potential Allocation: Housing

Site Description: the site is located beyond the Built-Up Area boundary to the north of County Oak, within a countryside location.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The site would be located within the noise contours associated with a second runway at the airport, and would need to be considered in design and mitigation of any properties. Negative Impact (-)
2. Adapt to Climate Change	The site is currently Greenfield, development of this site would increase hard surfacing; however mitigation could be designed in. Neutral Impact (/)
3. Protect and/or Enhance the Built Environment	The site is located outside the built up area, adjacent to the County Oak retail site. Uncertain Impact (?)
4. Decent/Affordable Homes	Could offer a substantial proportion of new homes. Increasing the capacity of the town to meet some of the need emerging from the population and would include 40% affordable. Significant Positive Impact (++)
5. Maintain/Support Employment	Whilst the provision of new housing is closely linked to supporting economic growth, this site is located within the land safeguarded for Gatwick Airport potential expansion. Significant Negative Impact (--)
6. Conserve/Enhance Biodiversity and Landscape	The site is located outside of the built up area boundary in the countryside, within the Upper Mole Farmlands Landscape Character Area. Significant Negative Impact (--)
7. Promote Sustainable Journeys	The site is located outside the urban area. Negative Impact (-)
8. Provide Sufficient Infrastructure	The site is located adjacent to the existing employment area which are served by existing infrastructure services. Uncertain Impact (?)
9. Promote	The site is located away from the existing established residential area. Significant Negative Impact (--)

SA Objective	Commentary and/or Impact
Sustainable Communities	
10. Encourage Active Lifestyles	This site is located away from the existing neighbourhood with limited access to facilities and services. Significant Negative Impact (--)
Conclusions	The site lies within the safeguarding area for Gatwick Airport and within the noise contours for a second runway, therefore it would not be appropriate to develop. In addition the site is disconnected from the residential area.

Assessment of Rejected Sites

Site Name: Land at Meldon

Site Potential Allocation: Housing

Site Description: the site is located beyond the Built-Up Area boundary, within a countryside location.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	Unknown Impact (?)
2. Adapt to Climate Change	The site is within flood zone and is currently Greenfield (therefore, designated as functional floodplain), development of this site would increase hard surfacing which would be a particular problem in the flood zone. Negative Impact (-)
3. Protect and/or Enhance the Built Environment	The site is located outside the built up area, close to locally designated Area of Special Local Character. Uncertain Impact (?)
4. Decent/Affordable Homes	Could offer a substantial proportion of new homes. Increasing the capacity of the town to meet some of the need emerging from the population and would include 40% affordable. Significant Positive Impact (++)
5. Maintain/Support Employment	The provision of new housing is closely linked to supporting economic growth. Significant Positive Impact (++)
6. Conserve/Enhance Biodiversity and Landscape	The site is located outside of the built up area boundary in the countryside. Significant Negative Impact (--)
7. Promote Sustainable Journeys	The site is located close to the urban area. Unknown Impact (?)
8. Provide Sufficient Infrastructure	The site is located adjacent to the existing residential area which are served by existing infrastructure services. Uncertain Impact (?)
9. Promote	Access to the site is constrained. Unknown Impact (?)

SA Objective	Commentary and/or Impact
Sustainable Communities	
10. Encourage Active Lifestyles	This site is located close to the existing neighbourhood with access to facilities and services, and to Rusper Road Playing Fields, Ifield Brook Meadows and the open countryside beyond the borough boundary. Significant Positive Impact (++)
Conclusions	The site lies within the functional floodplain (zone 3b), therefore it would not be appropriate to develop.

Assessment of Rejected Sites

Site Name: West of Ifield/Ifield Brook Meadows

Site Potential Allocation: Housing

Site Description: the site is located beyond the Built-Up Area boundary, within a countryside location.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	Unknown Impact (?)
2. Adapt to Climate Change	The site is within flood zone and is currently Greenfield (therefore, designated as functional floodplain), development of this site would increase hard surfacing which would be a particular problem in the floodplain. Significant Negative Impact (--)
3. Protect and/or Enhance the Built Environment	The site is located outside the built up area. The northern half of the site is included within the Ifield Village Conservation Area, with the meadows recognised as forming the historic setting of the village. To the south is the locally designated Area of Special Local Character. Significant Negative Impact (--)
4. Decent/Affordable Homes	Could offer a substantial proportion of new homes. Increasing the capacity of the town to meet some of the need emerging from the population and would include 40% affordable. Significant Positive Impact (++)
5. Maintain/Support Employment	The provision of new housing is closely linked to supporting economic growth. Significant Positive Impact (++)
6. Conserve/Enhance Biodiversity and Landscape	The site is located outside of the built up area boundary in the countryside and is designated as a Site of Nature Conservation Interest. Significant Negative Impact (--)
7. Promote Sustainable Journeys	The site is located close to the urban area. Unknown Impact (?)
8. Provide Sufficient Infrastructure	The site is located adjacent to the existing residential area which are served by existing infrastructure services. Uncertain Impact (?)

SA Objective	Commentary and/or Impact
9. Promote Sustainable Communities	The site has been promoted by the local community as a special green space, and is being proposed through the submission Local Plan as a Local Green Space. Significant Negative Impact (--)
10. Encourage Active Lifestyles	This site currently offers the local community access to informal natural greenspace and the open countryside beyond the borough boundary, development would result in its loss and would require local residents to travel further for such provision, potentially increasing car use. Significant Negative Impact (--)
Conclusions	The site lies within the functional floodplain (zone 3b) and a site of nature conservation importance, and partially within a Conservation Area, therefore it would not be appropriate to develop. The site is being pursued through the Local Plan for designation as a Local Green Space.

Assessment of Rejected Sites

Site Name: Land East of Balcombe Road

Site Potential Allocation: Housing

Site Description: the site is located beyond the Built-Up Area boundary to the north of the North East Sector, within a countryside location.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The site would be located within the noise contours associated with a single as well as a second runway at the airport. Significant Negative Impact (--)
2. Adapt to Climate Change	The site is currently Greenfield, development of this site would increase hard surfacing; however mitigation could be designed in. Neutral Impact (/)
3. Protect and/or Enhance the Built Environment	The site is located outside the built up area. Uncertain Impact (?)
4. Decent/Affordable Homes	Could offer a substantial proportion of new homes. Increasing the capacity of the town to meet some of the need emerging from the population and would include 40% affordable. Significant Positive Impact (++)
5. Maintain/Support Employment	Whilst the provision of new housing is closely linked to supporting economic growth, this site is located within the land safeguarded for Gatwick Airport potential expansion. Significant Negative Impact (--)
6. Conserve/Enhance Biodiversity and Landscape	The site is located outside of the built up area boundary in the countryside, within the High Woodland Fringes Landscape Character Area. A significant proportion of the site is Ancient Woodland Significant Negative Impact (--)
7. Promote Sustainable Journeys	The site is located outside the urban area. Negative Impact (-)
8. Provide Sufficient Infrastructure	The site is currently located away from the existing established residential area, however the development of North East Sector would reduce this distance. Uncertain Impact (?)
9. Promote	The site is currently located away from the existing established residential area, however the development of North East

SA Objective	Commentary and/or Impact
Sustainable Communities	Sector would reduce this distance. Uncertain Impact (?)
10. Encourage Active Lifestyles	This site is currently located away from the existing neighbourhood with limited access to facilities and services, however the development of North East Sector would reduce this distance. Uncertain Impact (?)
Conclusions	The site lies within the safeguarding area for Gatwick Airport and within the existing noise contours for the airport, therefore it would not be appropriate to develop. In addition the site is within the countryside, outside the built up area boundary and is currently disconnected from the residential area.

Assessment of Rejected Sites

Site Name: Land East of Street Hill

Site Potential Allocation: Housing

Site Description: the site is located beyond the Built-Up Area boundary, within a countryside location and within the boundaries of the Worth Conservation Area.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	Unknown Impact (?)
2. Adapt to Climate Change	The site is located adjacent to the Gatwick Stream and flood risks associated with the site would need to be investigated. Further, the site is currently Greenfield and any development of this site would increase hard surfacing. Negative Impact (-)
3. Protect and/or Enhance the Built Environment	The site is located outside the built up area. The site is included within the Worth Conservation Area, with the site recognised as forming part of the historic setting of the Grade I Listed Church. It immediately abuts an Archaeologically Sensitive Area relating to the Moat and Bishops Lodge/Worth Rectory. Significant Negative Impact (--)
4. Decent/Affordable Homes	Could offer a proportion of new homes. Increasing the capacity of the town to meet some of the need emerging from the population and would include 40% affordable. Significant Positive Impact (++)
5. Maintain/Support Employment	The provision of new housing is closely linked to supporting economic growth. Significant Positive Impact (++)
6. Conserve/Enhance Biodiversity and Landscape	The site is located outside of the built up area boundary in the countryside and is designated as an area of Nature Conservation Interest and Historic Park and Garden. Significant Negative Impact (--)
7. Promote Sustainable Journeys	The site is located close to the urban area. Unknown Impact (?)
8. Provide Sufficient	The site is located adjacent to the existing residential area which are served by existing infrastructure services. Uncertain Impact (?)

SA Objective	Commentary and/or Impact
Infrastructure	
9. Promote Sustainable Communities	Unknown Impact (?)
10. Encourage Active Lifestyles	Unknown Impact (?)
Conclusions	The site lies outside of the built up area boundary, within the countryside and within the Worth Conservation Area and rural setting of the Listed Church. The site is also a site of nature conservation importance. Therefore it would not be appropriate to develop.

Assessment of Rejected Sites

Site Name: Gas Holder Site

Site Potential Allocation: Housing

Site Description: the site is located within the new neighbourhood for the North East Sector.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	Land contamination issues would need to be considered in more detail, but is likely to be a significant constraint to the site's acceptability for housing development. Unknown Impact (?)
2. Adapt to Climate Change	The site is located within the flood zones, and is likely to be significantly constrained by flooding. Significant Negative Impact (--)
3. Protect and/or Enhance the Built Environment	The site is located within the North East Sector neighbourhood. Unknown Impact (?)
4. Decent/Affordable Homes	Could offer a limited number of new homes. Increasing the capacity of the town to meet some of the need emerging from the population and would include 40% affordable. Significant Positive Impact (++)
5. Maintain/Support Employment	The provision of new housing is closely linked to supporting economic growth. Significant Positive Impact (++)
6. Conserve/Enhance Biodiversity and Landscape	Unknown Impact (?)
7. Promote Sustainable Journeys	The site is located within the new neighbourhood. Unknown Impact (?)
8. Provide Sufficient Infrastructure	The site is located within the new neighbourhood which will be served by existing infrastructure services. Uncertain Impact (?)
9. Promote	The site would be located within the new neighbourhood providing access to the new services and facilities. Unknown

SA Objective	Commentary and/or Impact
Sustainable Communities	Impact (?)
10. Encourage Active Lifestyles	The site would be located within the new neighbourhood providing access to the new services and facilities. Unknown Impact (?)
Conclusions	The site is likely to be significantly constrained by land contamination and remediation and flood risk.

Assessment of Allocation Sites

Site Name: Broadfield Kennels, Broadfield

Site Potential Use: Gypsy and Traveller Site

Site Description: Broadfield Kennels is located to the southwest of the A264, owned wholly by the Council and straddles the Crawley and Horsham administrative boundary. Access to the site is off the A264 dual carriageway, which is particularly steep and narrow. The site is reasonably secluded from the few existing uses surrounding it, and moreover, the location is relatively flat.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The site is in location which would require a private vehicle for some purposes, (particularly retail) and is outside the Built-Up Area Boundary (BUAB). However, the site does have pedestrian access into the Broadfield neighbourhood which would negate the need to travel by car for daily purposes in most instances, (such as schooling, access to local health services and day-to-day retail needs). Noise and Air Quality: road/motorway junction? Contamination: previous uses of site? Uncertain Impact (?)
2. Adapt to Climate Change	The site is not in an area liable to flood, and moreover, drainage does not appear to be a significant issue. Both the proposed access improvements and the requirement for hard standing will mean that some permeable land will be lost. Any negative impact would negligible however. Neutral Impact (/)
3. Protect and/or Enhance the Built Environment	Development on this site will not significantly affect the built environment of the area, since there are few buildings surrounding this location, and none of which are listed or locally listed. Neutral Impact (/)
4. Decent/ Affordable Homes	Development on this site would provide accommodation for Gypsies and Travellers. Significant Positive Impact (++)
5. Maintain/ Support Employment	Any future development on the site may have small economic benefits since the occupants would contribute towards local community businesses. Possible Positive or Slight Positive Impact (+?)
6. Conserve/ Enhance Biodiversity and Landscape	Whilst the site is currently secluded, it is situated in an elevated position and therefore, development on this site could have a negative impact on the existing High Weald AONB designation unless this is taken into account as design considerations in the layout and landscaping of the site. There is also sporadic tree cover on the site and opportunity for the planting of trees to the screen the site further if required. Negative Impact (-) or Neutral Impact (/) following mitigation

SA Objective	Commentary and/or Impact
7. Promote Sustainable Journeys	The site currently has a particularly difficult vehicle access, which is steep, narrow and badly surfaced. The costs of providing a new access are likely to be substantial; however the site would not be developed as a Gypsy and Traveller site without improvements to the access. In addition, the site is to the south of the A264 and not directly within the existing urban neighbourhood of Broadfield. However, a direct pedestrian access from the site to the Broadfield neighbourhood underneath the A264 currently exists, which also provides access to bus routes along Creasys Drive. Negative Impact (-) or Neutral Impact (/) following mitigation
8. Provide Sufficient Infrastructure	The site would not increase substantially the number of highway users, since the number of Gypsy and Travellers likely to reside on the site would likely be inconsequential in terms of a highway impact. In addition, owing to the existing uses on the site, it is expected that sewage treatment and other infrastructure services to the site would be adequate, particularly if a new access was constructed. Possible Positive or Slight Positive Impact (+?)
9. Promote Sustainable Communities	The site is located in reasonably close proximity to the neighbourhood centre, the Broadfield Barton (approximately 1km), and moreover, it is in reasonably close proximity to schools also. Although the site is separated from the town by the A264, a pedestrian subway into the neighbourhood is accessible from the site. However, the site's location might be perceived to separate the settled community from the Gypsy and Traveller Community. Negative Impact (-)
10. Encourage Active Lifestyles	The development of this site would result in the loss of open space, but not of formal or informal sports playing pitches. The site is approximately 1km away from the local primary school and GP surgery, which is within a reasonable walking distance. The site has pedestrian access to playing fields/open spaces within Broadfield.
Conclusions	It is noted that for the accommodation of a Gypsy and Traveller site within Crawley, many difficulties will arise in terms air noise and environmental designations/constraints. This site is considered to have some merit in terms of access to local facilities and is not constrained by either noise or flooding. However, the Highway Authority has confirmed that a solution is possible and the draft Policy requires suitable highway, pedestrian and cycle access being achieved. The site would have an impact on the High Weald AONB, and therefore additional landscaping for screening will be important; the High Weald AONB Unit have offered support to ensure this is undertaken.

Assessment of Rejected Sites

Site Name: Land north of Langley Lane

Site Potential Use: Gypsy and Traveller Site

Site Description: The site is located to the east of Fir Tree Close and directly to the north of Langley Walk and is owned wholly by the Council. Vehicle access onto the site currently exists from Langley Walk. The site is level and extends to approximately one hectare. The site is also in close proximity to Langley Parade, Langley Green's neighbourhood centre.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The sites location, although just outside the BUAB, is in close proximity to local schools, a GP surgery and other community facilities such as Langley Parade. This will reduce the need to travel by car substantially. Since the site is adjacent the urban area, both pedestrian networks and public transport are readily accessible. In terms of noise pollution, the site is outside of the noise contours for a single runway, but not for a second runway, which would mean that the site may not be a permanent option if a second runway is constructed. There is an existing access onto the site but this will need to be assessed and most likely improved for caravans. The site is unlikely to be contaminated, although this will also need to be assessed on site. However, evidence was provided through the additional sites consultation which highlighted flooding concerns with this site. Both the proposed access improvements and the requirement for hard standing will mean that permeable land will be lost. Significant Negative Impact (--)
2. Adapt to Climate Change	The site is not in an area identified as within flood zones 2 or 3 in the Environment Agency flood maps, however evidence provided through the additional sites consultation which highlighted flooding concerns with the site. Both the proposed access improvements and the requirement for hard standing will mean that permeable land will be lost. Significant Negative Impact (--)
3. Protect and/or Enhance the Built Environment	The site is sufficiently separate from the main residential area. Caravans are a low-rise development. Suitable layout, screening and landscaping of the site can minimise the impact of the site. Management and maintenance of the site will ensure the built environment is protected. Neutral Impact (/)
4. Decent/Affordable Homes	Development on this site would provide accommodation for Gypsies and Travellers. However, this has to be considered against the noise pollution and flooding concerns as an appropriate location for this type of accommodation which is more vulnerable to these impacts than bricks and mortar accommodation. Possible Positive or Slight Positive Impact (+?)
5. Maintain/Support Employment	Any future development on the site may have small economic benefits since the occupants would contribute towards local community businesses. Possible Positive or Slight Positive Impact (+?)

SA Objective	Commentary and/or Impact
6. Conserve/ Enhance Biodiversity and Landscape	Outside the built up area boundary: Immediately adjacent to the urban area; suburban cul-de-sac to the west. Field in equestrian use to the east of the site, with some stabling and associated buildings present. Further east land in urban/suburban public recreation use. To the north – open countryside and site of nature conservation. Caravans are a low-rise development. Neutral Impact (/)
7. Promote Sustainable Journeys	The road network within the vicinity of the site is somewhat constrained. This is further compounded by on-street parking. Therefore, access along the existing access road is currently too narrow for accommodating caravans. As previously stated, the site is in close proximity to the neighbourhood centre, which is a substantial positive. Negative Impact (-)
8. Provide Sufficient Infrastructure	The site would not increase substantially the number of highway users, since the number of Gypsy and Travellers likely to reside on the site would likely be inconsequential in terms of a highway impact. However, the road network within the vicinity of the site is somewhat constrained. This is further compounded by on-street parking. Therefore, access along the existing access road is currently too narrow for accommodating caravans. Significant Negative Impact (--)
9. Promote Sustainable Communities	The site is located in reasonably close proximity to the neighbourhood centre, the Langley Parade (approximately 0.5km), and, it is in reasonably close proximity to local schools also. Positive Impact (+)
10. Encourage Active Lifestyles	The development of this site would result in the loss of open space, but not of public formal or informal sports playing pitches. The site is located within a reasonable walking distance to the local primary school and GP surgery. In addition, the site also has space to provide amenity land within the site, in addition to private garden space. The resultant effect of this could be positive for GTTS community. It would also ensure existing playing fields within the urban area are not required for such site provision/development. The site is very close to the Cherry Lane Playing Fields, which offers a number of open space recreation uses, and the Willoughby Fields playing fields – including rugby provision. It is also close to the Local Nature Reserve and offers good access to the open countryside. Significant Positive Impact (++)
Conclusions	On the basis of objections from Gatwick Airport to the allocation of the Langley Walk site, and the Airports Commission's decision to include the option of a wide-spaced second runway at Gatwick Airport in its further considerations of UK airport capacity, along with evidence provided by respondents to the Additional Sites Consultation which highlighted the extent of surface water and river flooding concerns with this site, it is considered unsuitable to take forward as an allocation for a reserve Traveller site in the submission Local Plan.

Assessment of Designation Sites

Site Name: Ifield Brook Meadows/Rusper Road Playing Fields

Site Potential Designation: Local Green Space

Site Description: Ifield Brook Meadows and Rusper Road Playing Fields are located to the west of the town, providing the links from the urban area with the countryside beyond the borough boundary. The Meadows are a Site of Nature Conservation Importance, and the northern part of the site falls within the Ifield Village Conservation Area.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The protection and retention of this site as a local green space, ensures there would be no additional climate change emissions or local pollution which would otherwise be associated with development. By providing green spaces close to the local community, this releases pressures on sensitive nature conservation locations, or locations accessible only by private car. Positive Impact (+)
2. Adapt to Climate Change	The site is within flood risk zones 2 and 3. Retention of the site as open space can providing mitigation against flood and surface water run off from elsewhere in the urban area. The protection of the site as local green space also provides continued protection for the habitats already valued in the area for nature conservation importance. Positive Impact (+)
3. Protect and/or Enhance the Built Environment	Part of the site to the north is recognised for its role in the Ifield Village Conservation Area, and its historic setting of the village. To the south this continues for the locally designated area of special character and wider residential area. It offers Crawley's connection to the countryside, and forms the boundary of the town in a countryside setting. Positive Impact (+)
4. Decent/Affordable Homes	Protection of the site as a Local Green Space removes the possibility for its use as a housing site. However, the majority of the site is already designated as an SNCI, and much is within the Ifield Village Conservation Area, identified for the rural character and context of the Listed Church and its paddocks, so this land would not be appropriate for housing anyway. Neutral Impact (/)
5. Maintain/Support Employment	No Impact (0)
6. Conserve/Enhance Biodiversity and Landscape	The protection of the site as local green space provides continued protection for the habitats already valued in the area for nature conservation importance. The site offers Crawley's connection to the countryside, and forms the boundary of the town in a countryside setting. Positive Impact (+)

SA Objective	Commentary and/or Impact
7. Promote Sustainable Journeys	By providing green spaces close to the local community, this releases pressures on sensitive nature conservation locations, or locations accessible only by private car. Positive Impact (+)
8. Provide Sufficient Infrastructure	No Impact (0)
9. Promote Sustainable Communities	A Local Green Space must be of value to the local community to be designated as such. This has been demonstrated through previous consultations. Positive Impact (+)
10. Encourage Active Lifestyles	The site provides Crawley's main access to the open countryside, along with the Rusper Road Playing Fields: supporting both informal and formal recreation. Positive Impact (+)
Conclusions	The site has been identified by previous consultation stages of the Local Plan as being special to the local community and holds particular local significance (historical, wildlife and recreation) to the local community. It has a number of special characteristics and assets which increase its value as a Local Green Space.

Assessment of Potential Designation Sites

Site Name: Memorial Gardens

Site Potential Designation: Historic Parks & Gardens

Site Description: The site is located within Crawley Town Centre, as a memorial to the first and second world wars.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	No Impact (0)
2. Adapt to Climate Change	No Impact (0)
3. Protect and/or Enhance the Built Environment	As a designated Historic Park & Garden, the historic assets of value to the Memorial Gardens will be protected. Development close to or within the Garden would have to take account of the interest particular to the site. Significant Positive Impact (++)
4. Decent/Affordable Homes	The site is unlikely to have been built upon, regardless of the designation. Neutral Impact (/)
5. Maintain/Support Employment	The site is an attractive formal garden setting within the town, and offers place for employee breaks. The designation and retention of features of historical significance could raise the profile of the town centre in its wider sense and form part of an attractive profile for prospective companies to relocate. Positive Impact (+)
6. Conserve/Enhance Biodiversity and Landscape	The protection of the site as a Historic Park & Garden will ensure the site is maintained as public open space within the town, however, this is likely to be the case even without the designation. Neutral Impact (/)
7. Promote Sustainable Journeys	The site is accessible from all neighbourhoods (less than a mile from Crawley's town centre), particularly Southgate, Northgate and West Green. Retaining historical features in green spaces close to the local community releases pressure on sensitive nature conservation locations, or locations accessible only by private car. Positive Impact (+)
8. Provide Sufficient Infrastructure	No Impact (0)
9. Promote	Heritage assets are of fundamental importance to the sense of place and value people place in their communities and

SA Objective	Commentary and/or Impact
Sustainable Communities	towns. Significant Positive Impact (++)
10. Encourage Active Lifestyles	The gardens were historically established to allow a place for children to play within the town, prior to its identification and development as a new town. This principle has been retained in its current form, regardless of its more formal gardens function now. Neutral Impact (/)
Conclusions	The park's historical association with the First and Second World War and also the formation of the New Town is significant. Recognition of the Memorial Gardens' historic interest to the town offers economic, social and environmental benefits.

Assessment of Potential Designation Sites

Site Name: Goffs Park

Site Potential Designation: Historic Parks & Gardens

Site Description: Formal Public Park, designated by the New Town. Located within Southgate neighbourhood.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	No Impact (0)
2. Adapt to Climate Change	No Impact (0)
3. Protect and/or Enhance the Built Environment	As a designated Historic Park & Garden, the historic assets of value to Goffs Park will be protected. Development close to or within the Park would have to take account of the interest particular to the site. Significant Positive Impact (++)
4. Decent/Affordable Homes	The site is unlikely to have been built upon, regardless of the designation. Neutral Impact (/)
5. Maintain/Support Employment	No Impact (0)
6. Conserve/Enhance Biodiversity and Landscape	The protection of the site as a Historic Park & Garden will ensure the site is maintained as public open space within the town, however, this is likely to be the case even without the designation. Neutral Impact (/)
7. Promote Sustainable Journeys	Retaining historical features in green spaces close to the local community releases pressure on sensitive nature conservation locations, or locations accessible only by private car. Positive Impact (+)
8. Provide Sufficient Infrastructure	No Impact (0)
9. Promote	Heritage assets are of fundamental importance to the sense of place and value people place in their communities and

SA Objective	Commentary and/or Impact
Sustainable Communities	towns. Significant Positive Impact (++)
10. Encourage Active Lifestyles	The park was historically established to allow a place for children to play and local residents to enjoy a variety of outdoor recreation activities as part of the new town design. This principle has been retained through open space policies. Neutral Impact (/)
Conclusions	The layout, features and the park as whole are an important part of Crawley's New Town History. Recognition of Goffs Park's historic interest offers environmental and social benefits.

Assessment of Potential Designation Sites

Site Name: Tilgate Park – Lake & Woodland

Site Potential Designation: Historic Parks & Gardens - Extension

Site Description: Formal Public Park

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	No Impact (0)
2. Adapt to Climate Change	No Impact (0)
3. Protect and/or Enhance the Built Environment	As a designated Historic Park & Garden, the historic assets of value to Tilgate Park will be protected. Development close to or within the Park would have to take account of the interest particular to the site. The site is an extension of the existing Historic Park & Garden designation and is in a location removed from the urban area, therefore the direct impact would be likely to be minimal. Positive Impact (+)
4. Decent/ Affordable Homes	The site is unlikely to have been built upon, regardless of the designation. Neutral Impact (/)
5. Maintain/ Support Employment	There are a number of businesses which function within Tilgate Park, however, these are located within the boundaries of the existing Historic Park and Garden designation. The continued commercial use of the lake is unlikely to cause any issue with the designation. No Impact (0)
6. Conserve/ Enhance Biodiversity and Landscape	The protection of the site as a Historic Park & Garden will ensure the site is maintained as public open space within the town, however, this is likely to be the case even without the designation. Neutral Impact (/)
7. Promote Sustainable Journeys	Retaining historical features in green spaces close to the local community releases pressure on sensitive nature conservation locations, or locations accessible only by private car. Positive Impact (+)
8. Provide Sufficient Infrastructure	No Impact (0)

SA Objective	Commentary and/or Impact
9. Promote Sustainable Communities	Heritage assets are of fundamental importance to the sense of place and value people place in their communities and towns. Significant Positive Impact (++)
10. Encourage Active Lifestyles	The park was historically established to allow a place for children to play and local residents to enjoy a variety of outdoor recreation activities as part of the new town design. This principle has been retained. Significant Positive Impact (++)
Conclusions	The extension includes the ornamental lake and the kitchen gardens together with its adjacent orchard which were part of the original pleasure grounds. This provides consistency and recognises the role the whole Park plays in the historic interest to the area.

Assessment of Potential Change to Designation Sites

Site Name: Ifield Park

Site Potential Change to Designation: Removal of Historic Parks & Gardens Designation

Site Description: Ifield Park is located to the west of Ifield Village. It is run now as a residential home for the elderly.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	No Impact (0)
2. Adapt to Climate Change	No Impact (0)
3. Protect and/or Enhance the Built Environment	The important assets within the site can be protected through other planning policy measures: including Tree Preservation Orders and general design policies. Neutral Impact (/)
4. Decent/Affordable Homes	The site is currently in use as a care home. Neutral Impact (/)
5. Maintain/Support Employment	No Impact (0)
6. Conserve/Enhance Biodiversity and Landscape	The important trees within the site can be protected through Tree Preservation Orders. Neutral Impact (/)
7. Promote Sustainable Journeys	No Impact (0)
8. Provide Sufficient Infrastructure	No Impact (0)
9. Promote	The continued protection of a site when it is not supported by evidence potentially undermines the value of the

SA Objective	Commentary and/or Impact
Sustainable Communities	designation in other locations. No Impact (0)
10. Encourage Active Lifestyles	No Impact (0)
Conclusions	Whilst the site was once part of a larger area of land that formed a pleasure ground and park-like meadowlands, the area has changed considerably with much of the land having been developed between 1930s-1950s. Some original trees remain but the site has lost much of its historic interest and therefore should no longer be designated for this purpose.

Assessment of Potential Change to Designation Sites

Site Name: Burleys Wood

Site Potential Change to Designation: Removal of Historic Parks & Gardens Designation

Site Description: The site is a small area of amenity open space on the edge of the urban area, immediately adjacent to the M23 motorway. It historically formed part of Crabbet Park estate.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	No Impact (0)
2. Adapt to Climate Change	No Impact (0)
3. Protect and/or Enhance the Built Environment	The important assets within the site can be protected through other planning policy measures: including open space, structural landscaping, trees, green infrastructure and general design policies. Neutral Impact (/)
4. Decent/Affordable Homes	The de-designation of the site does not release the site for built development. Neutral Impact (/)
5. Maintain/Support Employment	No Impact (0)
6. Conserve/Enhance Biodiversity and Landscape	The de-designation of the site does not release the site for built development. The site is an open space amenity area providing links to the countryside beyond the Motorway in Mid Sussex. The site remains outside the Built Up Area boundary. Neutral Impact (/)
7. Promote Sustainable Journeys	No Impact (0)
8. Provide Sufficient Infrastructure	No Impact (0)

SA Objective	Commentary and/or Impact
9. Promote Sustainable Communities	The continued protection of a site when it is not supported by evidence potentially undermines the value of the designation in other locations. No Impact (0)
10. Encourage Active Lifestyles	No Impact (0)
Conclusions	Whilst the land was originally part of the parkland of Crabbet Park, in the 1960s it was severed from the main estate by the development of the M23 motorway. The shape of the original parkland is identifiable but the area is isolated from the main estate and has a lack of historical features to conserve. The area within Crawley should therefore no longer be designated for this purpose.

Assessment of Employment Sites

This section of the Sustainability Appraisal assesses the sustainability contribution of the Main Employment Areas identified in the Local Plan (Local Plan Policies EC1, EC2, EC3, GAT4) and also broader areas which may be explored through the Local Plan (Policy EC1) to address identified employment need over the Plan period as well as sites which have been considered and rejected. Local Plan Key Opportunity Sites (Policies H2 and EC6) have been appraised as mixed use sites above.

Assessment of Main Employment Sites (Policy EC1 - EC3)

Site Name: Manor Royal

Site Description: An area of approximately 240 hectares located to the north of the Borough and south of the airport, Manor Royal is Crawley's main business area, comprising predominantly B Use Class development. The area contains clusters of B1 uses at City Place, Astral Towers and Crawley Business Quarter, more industrial warehousing along its eastern perimeter at Gatwick Road, and retail warehousing at County Oak.

Site Potential Use: Manor Royal Business District is the leading destination for business uses. It is allocated as a Main Employment Area, with a particular focus on business development. Other employment uses will be permitted where these would support the overall business role and function of Manor Royal.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Mitigate Climate Change & Local Pollution	The location of Manor Royal as a compact Main Employment Area ensures that development can be sustainably located adjacent to existing economic development. The area is also defined as an Opportunity Area which promotes the development of a district energy network, and asks new development to consider the options of link to or creating a network. Through continuing to identify Manor Royal as a Main Employment Area, the Local Plan retains the historic operation and location of the new town industrial estate, whilst setting in place policy mechanisms to promote sustainable development. Significant Positive Impact ++
2. Adapt to Climate Change	The business district has potential to be utilised as a decentralised energy network that will allow for a low carbon technology. The re-intensification of using existing land will also minimise resource use and supports employment clusters and urban land forms which are resilient to climate change. Positive Impact +
3. Protect and/or Enhance the Built Environment	Continued allocation of Manor Royal as a Main Employment Area retains the established land use, and protects the existing character and form of the town. The business district includes listed buildings and reflects the evolution of the new town industrial estate through to new state of the art high grade office buildings. The formal identification of

SA Objective	Commentary and/or Impact
	Manor Royal in the Local Plan also links with the Manor Royal Design Guide SPD to promote the overall enhancement of the Manor Royal environment. Significant Positive Impact ++
4. Decent/ Affordable Homes	The area is protected for business and supporting employment uses and therefore it does restrict the development of housing within the area outside of those established through permitted development rights (B1-C3 changes). However with regard to the quality of housing provision, there would be concerns that housing would be an appropriate use within the area, potentially impacting upon the amenity of those people that would live in the houses, or through restrictions that residential amenity would place on the economic function of the surrounding area. There is also a need to sustain an economic function of the town both for its residents and for the wider sub- region. By losing economic floorspace to housing, the town and the ability for people to afford housing may be negatively impacted and therefore retention of the economic function at the expense of housing may have a wider sustainability benefit. In this regard, continued identification of Manor Royal as a Main Employment Area is considered to have a neutral impact against this objective. Neutral Impact
5. Maintain/ Support Employment	Continued identification of Manor Royal as a Main Employment Area will ensure that the economic function of the town, at the heart of the Gatwick diamond sub-region is retained and positively planned. The policies build on the evidence base that Crawley should remain the focus for such development. The policies also reflect the differing nature of area and a distinction is made between employment areas and those that afford other levels of protection such as the Manor Royal, the Town centre and Gatwick Airport. Retaining the role of Manor Royal as a business-led economic development destination, therefore performs strongly against this objective. Significant Positive Impact ++
6. Conserve/ Enhance Biodiversity and Landscape	The business district has defined boundaries and sits within the Built-Up Area Boundary. The identification of the area with the retention of Magpie wood as an area TPO to be opened up through the development of the adjacent site at Principal Park and the designation of Crawters Brook as a people's park will enhance and conserve the biodiversity and landscape of the business district. The use of the Manor Royal Design Guide SPD support policies EC1-EC3 further, with regard to improving the natural landscaping of the area. Positive Impact +
7. Promote Sustainable Journeys	Manor Royal is located in close proximity to a sustainable range of transport links other than the car, with a network of pedestrian routes and cycle ways crossing the business district. With close links to nearby neighbourhoods, and Fastway also being readily accessible the retention of the area as a main employment area supports sustainable traffic movements. Positive Impact +
8. Provide Sufficient Infrastructure	The current employment area utilises the existing infrastructure but also provides an opportunity to develop a district energy network, and other facilities to support the locality. Positive Impact +

SA Objective	Commentary and/or Impact
9. Promote Sustainable Communities	Through balancing and assessing housing and employment growth, the Local Plan can enable the town and its residents to be cohesive and travel locally to work, accessing a wide variety of opportunities. The opportunities associated with this Main Employment Area, in close proximity to the town allow residents the ability to up-skill and access a myriad of opportunities in the workplace. The in-commuting that occurs from neighbouring authorities also demonstrates a wider and more integrated community base for the area. Possible Positive or Slight Positive Impact +?
10. Encourage Active Lifestyles	Within the Main Employment Area, work has been undertaken to improve cycling, pedestrian links, and jog trails. Continued protection of the area ensures that these links are retained. Local Plan Policies EC1-EC3 also build upon the close proximity of the employment area within the existing community, and thereby the opportunity for more sustainable forms of access are available. Possible Positive or Slight Positive Impact +?
Conclusions	Manor Royal Business District is a well established and sustainable location for economic development. It is the most sustainable location for employment growth through the utilisation and intensification of land, and its continued identification as a Main Employment Area reflects a positive and sustainable approach to planning for economic development.

Assessment of Employment Sites (Policy EC1-EC3)

Site Name: Crawley Town Centre

Site Description: Crawley Town Centre is the main shopping area in the borough, and is a key shopping destination for the wider sub-region. It contains a good range of shops, restaurants, cafes, and bars, as well as entertainment uses at Crawley Leisure Park, although there is limited residential use at present. The Town Centre also contains a number of development sites, which are allocated in the Local Plan for mixed-use development comprising residential and Main Town Centre Uses.

Site Potential Use: As a centrally located and highly sustainable location, the Town Centre is the preferred location for a range of Main Town Centre Uses. It also represents a highly sustainable location for residential development with immediate access to facilities, services, and transport links. Housing development is encouraged in the town centre, either as mixed use redevelopment or as conversions of the upper floors of existing retail premises.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Mitigate Climate Change & Local Pollution	The Town Centre represents a highly sustainable location at the heart of Crawley. It contains a wide range of facilities and services that cater for the needs of the residents and visitors to the town, and is well connected to the rest of Crawley and the wider area by a range of sustainable transport links. The Town Centre is also defined as an Opportunity Area which promotes opportunity for the development of a district energy network, and asks new development to consider the options of link to or creating a network. For these reasons, the Town Centre is recognised as a highly sustainable location for economic development and housing. Significant Positive Impact ++
2. Adapt to Climate Change	The Town Centre has the potential to be utilised as a decentralised energy network that will allow for a low carbon technology. The re-intensification of using existing land will also minimise resource use and supports employment clusters and urban land forms which are resilient to climate change. Positive Impact +
3. Protect and/or Enhance the Built Environment	Identification of the Town Centre as a Main Employment Area, and the allocation of specific sites at Town Centre and Edge-of-Centre locations, presents an opportunity to enhance the overall setting of the built environment through good design and the bringing into use of underutilised or vacant sites. Further, through recognising the Town Centre as an employment site, the local plan continues to recognise the established commercial character of the Town Centre. Positive Impact +
4. Decent/Affordable Homes	The Town Centre has been identified as a Main Employment Area, but the local plan also recognises it as a sustainable location for residential development. Although housing would not be considered in NPPF terms to represent economic development, designation of the Town Centre as a Main Employment Area will not prejudice the delivery of residential development. It is also recognised that the allocation of specific Town Centre locations for mixed use development may encourage the delivery of housing. For these reasons, considered that allocation of the Town Centre as a Main

SA Objective	Commentary and/or Impact
	Employment Area will have an uncertain, and potentially positive, impact on the delivery of decent affordable homes. Possible Positive or Slight Positive Impact +?
5. Maintain/ Support Employment	The designations and allocations ensure that the employment function of the Town Centre is retained, and that opportunities are maximised to promote and deliver sustainable economic development through the promotion of centrally located Main Town Centre uses. Significant Positive Impact ++
6. Conserve/ Enhance Biodiversity and Landscape	Crawley Town Centre is predominantly urban in character. The Memorial Gardens represent a key open space asset, and are designated in the local plan as a Historic Park & Garden meaning that the area will be protected from inappropriate development. Although development within the Town Centre will be encouraged to promote biodiversity through good design and landscaping, it is not considered that allocation of the Town Centre as a Main Employment Area will result in an impact on biodiversity. No Impact 0
7. Promote Sustainable Journeys	The Town Centre represents a highly sustainable location for employment and residential development, providing immediate access to facilities, services, and transport links. Through balancing and assessing housing and employment growth, and promoting mixed-use development in the Town Centre, we can enable the town and its residents to be cohesive and travel locally to work, accessing a wide variety of opportunities. Significant Positive Impact ++
8. Provide Sufficient Infrastructure	The Town Centre currently benefits from excellent existing infrastructure. However, recognising the economic role of the Town Centre and allocating underutilised sites for mixed use development creates a further opportunity to plan and deliver the infrastructure needed to support development. Positive Impact +
9. Promote Sustainable Communities	Through promoting sustainable economic development and encouraging the mixed-use redevelopment of several under-utilised Town Centre and Edge-of-Centre sites, the local plan will support a range of Main Town Centre Uses in a sustainable Town Centre location. This approach plans positively to support the promotion of sustainable communities. Positive Impact +
10. Encourage Active Lifestyles	The Town Centre contains a number of commercial leisure uses and also the Memorial Gardens, both of which promote access to active lifestyles. A sustainable central location and immediate proximity to transport links creates a wider opportunity for Town Centre developments to link with leisure facilities and areas. Through identifying the Town Centre as a Main Employment Area, whilst also promoting centrally located residential development, the local plan will continue to encourage the promotion of active lifestyles through the planning process. Positive Impact +
Conclusions	Crawley Town Centre represents a sustainable centre for economic growth should continue to be supported as the key destination for Main Town Centre Uses throughout the local plan period.

Assessment of Employment Sites (Policy EC1-EC3 and GAT4)

Site Name: Gatwick Airport

Site Description: Gatwick is the world’s busiest single runway, two-terminal airport, and is forecast to grow to a capacity of 45million passengers per annum, within its current configuration. As a hub for employees and visitors, and a key economic driver through direct and indirect employment, the airport is central to the function of the wider economic area, and provides a significant number of jobs. The local plan is required to safeguard land adjacent to accommodate for a potential second runway, subject to a formal Government decision as to the location of a second runway and future position on safeguarding.

Site Potential Use: The airport accommodates a quantum of on-airport employment, including a significant amount of office floorspace. This space is protected for use by occupiers that are directly related to the operation of the airport, though the local plan provides flexibility for the loss of airport-related office space where it can be demonstrated that the loss will not have a detrimental effect on the ability of the airport to meet its operational needs as it expands.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Mitigate Climate Change & Local Pollution	The airport is a highly sustainable location for employment uses which support the operation of the airport. Policies do provide the flexibility for other non-airport related employment uses to locate in vacant offices at the airport if this does not impact on the airport to meet its operational needs. This will help ensure that best use is made of the available floorspace at the airport whilst also ensuring additional land is not required for operational uses. The use of existing employment floorspace at the airport will have a minimal effect on pollution as staff can benefit from sustainable access to the airport. Significant Positive Impact ++
2. Adapt to Climate Change	Gatwick Airport provides the opportunity to utilise a decentralised energy network. The airport has also developed its own climate change strategy which highlights a range of initiatives that it will undertake to reduce CO2 emissions. Positive Impact +
3. Protect and/or Enhance the Built Environment	The use of employment space at the airport makes the best use of existing buildings. Positive Impact +
4. Decent/ Affordable Homes	Housing is not an appropriate use at the airport because of the noise impact. No Impact 0
5. Maintain/ Support Employment	There is an emphasis on airport related uses at the airport which specifically require an airport location for operational, safety or functional reasons. This will enable the safe and efficient operation of the airport. The airport provides a significant contribution to the local community. Significant Positive Impact ++

SA Objective	Commentary and/or Impact
6. Conserve/ Enhance Biodiversity and Landscape	Although the airport is predominately made up of the built environment, the airport does undertake activities as part of its corporate responsibility to maintain and enhance areas of biodiversity within its ownership. Positive Impact +
7. Promote Sustainable Journeys	The airport is a highly sustainable location accessed by train, bus and air. It also benefits from cycle and walking access as it is on the National Cycle Network which does provide access via paths to the terminals. Provision is made for some staff car parking but the airports staff travel plan contains a wide range of initiatives to encourage staff to travel by sustainable modes. Positive Impact +
8. Provide Sufficient Infrastructure	Employment uses at the airport make efficient use of existing infrastructure. The policy would not require the provision of additional infrastructure. Neutral Impact /
9. Promote Sustainable Communities	The airport is a transport interchange and an employment area. Due to the nature of its operations it is not appropriate for other uses to be located there. However, it is accessible to staff living in the surrounding areas and the airport has its own strategy towards community engagement to work with the local community. Positive Impact +
10. Encourage Active Lifestyles	The primary focus of the airport is to provide facilities for passengers and staff using the airport. It would therefore not be a location for leisure uses. No Impact 0
Conclusions	Gatwick Airport is a key employment destination. Its identification as a Main Employment Area will enable it to continue in this function, representing a positive approach to supporting sustainable economic development.

Assessment of Employment Sites (Policy EC1-EC3)

Site Name: Three Bridges Corridor

Site Description: Three Bridges Corridor is a large and well-connected employment site situated south of Haslett Avenue East and Three Bridges Railway Station. It offers a selection of smaller and less modern units, comprising a mix of light industrial, office, trade, and automotive uses. The eastern extent of the corridor links more closely to Crawley Town Centre, whilst residential uses adjoin the area and split the Main Employment Area adjacent to the Square-about.

Site Potential Use: The site continues to be identified for a flexible range of employment generating uses that will contribute to the overall economic function of the town.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Mitigate Climate Change & Local Pollution	Three Bridges Corridor is sustainably located between Three Bridges and Crawley Railway Stations, and adjacent to Crawley Town Centre. It benefits from good access from public transport, cycling, and on foot. It is however recognised that as a well-established employment location comprising a range of smaller start-up units and independent operators, vehicular access by private car will continue to have a negative impact in climate change mitigation terms. In maintaining the corridor as a Main Employment Area, the local plan makes use of the existing location and provides sustainability benefit through clustering employment uses within an identified area. Weighing up the above considerations, its allocation as a Main Employment Area is considered to be neutral against this criteria. Neutral Impact /
2. Adapt to Climate Change	Continued identification of Three Bridges Corridor as a Main Employment Area will not itself specifically bring about the adaptation of the area to climate change. No Impact 0
3. Protect and/or Enhance the Built Environment	Three Bridges Corridor performs an important local function in providing accommodation for smaller-scale employment uses, enabling the clustering of similar uses of light industrial, office, trade, and automotive. Continued identification of Three Bridges Corridor as a main employment area provides the market with a greater choice of accommodation, and therefore reduces the need for employment uses to consider locating in less appropriate areas where there could be scope for a negative impact in terms of impacting the character of the built environment. In this regard, continued use of the Corridor for employment use is viewed as having an uncertain, but potentially positive, impact. Possible Positive or Slight Positive Impact +?
4. Decent/ Affordable Homes	Three Bridges Corridor performs an important local function in providing accommodation for smaller-scale employment uses, enabling the clustering of similar uses of light industrial, office, trade, and automotive. The identification of main employment areas as employment destinations will not directly deliver decent/ affordable homes. However, in contributing to the overall choice of established business destinations in Crawley, its designation will help the plan to balance the

SA Objective	Commentary and/or Impact
	demands of employment and housing, meaning that other locations can be identified as a focus for accommodating housing need. For this reason, continued use of Three Bridges Corridor for employment use is viewed as having an uncertain, but potentially positive, impact. Possible Positive or Slight Positive Impact +?
5. Maintain/ Support Employment	Three Bridges Corridor is one of several sites identified as a Main Employment Area in the Local Plan, and employment generating development at these locations will be supported. Identification as a Main Employment Area enables a greater focus on employment uses, protecting these locations for economic development to help ensure that employment needs can be accommodated over the Plan period. Significant Positive Impact ++
6. Conserve/ Enhance Biodiversity and Landscape	Continued identification of Three Bridges Corridor as a Main Employment Area will not itself specifically bring about the enhancement of biodiversity and landscape. No Impact 0
7. Promote Sustainable Journeys	Three Bridges Corridor is sustainably located between Three Bridges and Crawley Railway Stations, and adjacent to Crawley Town Centre. It benefits from good access from public transport, cycling, and on foot. It is however recognised that as a well-established employment location comprising a range of smaller start-up units and independent operators, vehicular access by private car will continue to have a negative impact in climate change mitigation terms. Neutral Impact /
8. Provide Sufficient Infrastructure	Three Bridges Corridor is already served by a range of transport modes including train, bus, bicycle, and by private vehicle. It does not contain an extensive range of facilities to support employees and businesses, though the relevant local plan policies provide scope to accommodate supporting non-economic uses where these are justified against the policy criteria. Neutral Impact /
9. Promote Sustainable Communities	Three Bridges Corridor is sustainably located between Three Bridges and Crawley Railway Stations, and adjacent to Crawley Town Centre, and benefits from good access via public transport, cycling, and on foot. Through providing accessible employment opportunities and services, and clustering employment uses within an identified area, the designation may be viewed as contributing to the promotion of sustainable communities. Possible Positive or Slight Positive Impact +?
10. Encourage Active Lifestyles	Although Three Bridges Corridor is situated close to Jubilee Fields and contains some leisure uses, its continued identification as a Main Employment Area will not itself specifically encourages active lifestyles. No Impact 0
Conclusions	The protection of the Three Bridges Corridor as a Main Employment Area and focus for economic generating development should be retained within the Local Plan given its sustainable location with the town and proximity to three bridges station. The location as a main employment area and one that should be protected against non employment generating development is necessary and appropriate.

Assessment of Employment Sites (Policy EC1-EC3)

Site Name: Maidenbower Business Park

Site Description: Maidenbower Business Park is situated at the south-east of the borough, adjacent to the M23. The site was not specifically identified as a formal employment area in the Core Strategy (2008), but is well-established as an employment destination. The site is almost fully built out with a mix of light industrial, storage, and office uses, as well as other uses including a car dealership. The final vacant plot is currently being brought forward for development, though there is limited scope for intensification beyond this.

Site Potential Use: The site is identified for a flexible range of employment generating uses that will contribute to the overall economic function of the town.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Mitigate Climate Change & Local Pollution	Maidenbower Business Park provides an established employment function close to the neighbourhoods of Maidenbower and Pound Hill. The site is accessible by a choice of transport modes, though its close strategic access from the M23 results in private car representing a key means of access. Identification of the Business Park as a Main Employment Area continues to make use of an established employment location and will help to ensure that this function is retained. Weighing up the above considerations, its allocation as a Main Employment Area is considered to be neutral against this objective. Neutral Impact /
2. Adapt to Climate Change	Continued identification of Maidenbower Business Park as a Main Employment Area will not itself specifically bring about the adaptation of the area to climate change. No Impact 0
3. Protect and/or Enhance the Built Environment	The identification of Maidenbower Business Park as a Main Employment Area provides the market with a greater choice of accommodation, and therefore reduces the need for employment uses to consider locating in less appropriate areas where there could be scope for a negative impact on the character of the built environment. In this regard, continued identification of Maidenbower Business Park for employment use is viewed as having an uncertain, but potentially positive, impact. Possible Positive or Slight Positive Impact +?
4. Decent/ Affordable Homes	The identification of main employment areas as employment destinations will not directly deliver decent/ affordable homes. However, in contributing to the overall choice of established business destinations in Crawley, the designation of Maidenbower Business Park will help the plan to balance the demands of employment and housing, meaning that other locations can be identified as a focus for accommodating housing need. For this reason, continued use of Maidenbower Business Park for employment use is viewed as having an uncertain, but potentially positive impact, against this indicator. Possible Positive or Slight Positive Impact +?
5. Maintain/	Maidenbower Business Park is one of several sites identified as a Main Employment Area in the Local Plan, and

SA Objective	Commentary and/or Impact
Support Employment	employment generating development at these locations will be supported. Identification as a Main Employment Area enables a greater focus on employment uses, protecting these locations for economic development to help ensure that employment needs can be accommodated over the Plan period. Significant Positive Impact ++
6. Conserve/ Enhance Biodiversity and Landscape	Continued identification of Maidenbower Business Park as a Main Employment Area will not itself specifically bring about the enhancement of biodiversity and landscape. No Impact 0
7. Promote Sustainable Journeys	Maidenbower Business Park located in the south east of Crawley. It is accessible from the adjoining neighbourhoods and via bus, though its location close to the edge of town and adjacent to the M23 junction makes the site more accessible by private car. Given that the site is established in operating as an economic location, its formal identification as a Main Employment Area does not impact against this category. No Impact 0
8. Provide Sufficient Infrastructure	Maidenbower Business Park has a long-standing employment function, and is accessible by a range of transport modes. Given the existing function of the site, its formal identification as a Main Employment Area will not itself deliver, significant infrastructure, though the limited scope for intensification means that significant further infrastructure is unlikely to be required to serve the site. Neutral Impact /
9. Promote Sustainable Communities	Identification of Maidenbower Business Park as a Main Employment Area will maintain the existing economic function of the site. The site is accessible from Maidenbower and Pound Hill neighbourhoods, and also via bus, providing a locally accessible employment function, though the close proximity of the M23 junction means that private vehicle continues to represent an important means of access. The site does not itself provide facilities or services to support employees, although Maidenbower Neighbourhood Centre remains within walking distance. Given the smaller scale of the site and that there is already an established economic function in place, it is not considered that identification of Maidenbower Business Park as a Main Employment Area would impact on this indicator. No Impact 0
10. Encourage Active Lifestyles	Although Maidenbower Business Park is situated close to Maidenbower Park, its identification as a Main Employment Area will not itself specifically encourage active lifestyles. No Impact 0
Conclusions	The protection of Maidenbower Business Park as a Main Employment Area and focus for economic generating development should be retained within the local plan given its existing role in the economic function of the town and proximity to the M23 junction 10A. Its identification as a Main Employment Area and one that should be protected against non employment generating development is necessary and appropriate.

Assessment of Employment Sites (Policy EC1-EC3)

Site Name: Tilgate Forest Business Park

Site Description: Tilgate Forest Business Park is a small, self-contained site situated adjacent to an area of countryside and mature woodland close to the south of the borough. It is largely separate from Crawley's urban area, accessed via the A23 (southbound) and with good links to the M23. The site was not formally identified as an employment location in the Core Strategy (2008), but represents an established employment location comprising a cluster of good quality office accommodation.

Site Potential Use: The site is identified for a flexible range of employment generating uses that will contribute to the overall economic function of the town.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Mitigate Climate Change & Local Pollution	Tilgate Forest Business Park provides an established employment offer, and its identification as a Main Employment Area will continue to make use of the existing location and provide sustainability benefits through clustering employment uses within an identified area. The site is not especially accessible from Crawley's neighbourhoods by foot, though the site is accessible by public transport. Its location just off the A23 means that private car represents the most likely means of access. Weighing up the above considerations, the allocation of Tilgate Forest Business Park as a Main Employment Area is considered to be neutral against this objective. Neutral Impact /
2. Adapt to Climate Change	Continued identification of Tilgate Forest Business Park as a Main Employment Area will not itself specifically bring about the adaptation of the area to climate change. No Impact 0
3. Protect and/or Enhance the Built Environment	The identification of Tilgate Forest Business Park as a Main Employment Area provides the market with a greater choice of accommodation, and therefore reduces the need for employment uses to consider locating in less appropriate areas where there could be scope for a negative impact on the character of the built environment. In this regard, identification of Tilgate Forest Business Park for employment use is viewed as having an uncertain, but potentially positive, impact. Possible Positive or Slight Positive Impact +?
4. Decent/ Affordable Homes	The identification of main employment areas as employment destinations will not directly deliver decent/ affordable homes. However, in contributing to the overall choice of established business destinations in Crawley, the designation of Tilgate Forest Business Park will help the plan to balance the demands of employment and housing, meaning that other locations can be identified as a focus for accommodating housing need. For this reason, continued use of Tilgate Forest Business Park for employment use is viewed as having an uncertain, but potentially positive impact, against this indicator. Possible Positive or Slight Positive Impact +?
5. Maintain/	Tilgate Forest Business Park is one of several sites identified as a Main Employment Area in the Local Plan, and

SA Objective	Commentary and/or Impact
Support Employment	employment generating development at these locations will be supported. Identification as a Main Employment Area enables a greater focus on employment uses, protecting these locations for economic development to help ensure that employment needs can be accommodated over the plan period. Significant Positive Impact ++
6. Conserve/ Enhance Biodiversity and Landscape	Tilgate Forest Business Park is situated within the Built-up-Area Boundary, though is situated adjacent to an area of countryside and mature woodland (including ancient woodland). Identification of the site as a Main Employment Area will help to retain the existing employment function within its current curtilage. Therefore, although the park is situated close to an area of biodiversity and landscaping, given that this is an established use, its identification as a Main Employment Area will not impact upon the objective to enhance biodiversity and landscape. No Impact 0
7. Promote Sustainable Journeys	Identification of Tilgate Forest Business Park as a Main Employment Area will maintain the existing economic function of the site. The site is not especially accessible from Crawley's neighbourhoods on foot, and bus and private car represent the key means of access. The site does not itself provide facilities or services to support employees, potentially increasing the need to travel. Weighing up the above considerations, in particular that the site already operates as an economic locations, it is not considered that identification of Tilgate Forest Business Park as a Main Employment Area would impact on this indicator. No Impact 0
8. Provide Sufficient Infrastructure	Tilgate Forest Business Park has a long-standing employment function, and is accessible by a range of transport modes. Given the existing function of the site, its formal identification as a Main Employment Area will not itself deliver, significant infrastructure, though the limited scope for intensification means that significant further infrastructure is unlikely to be required to serve the site. Neutral Impact /
9. Promote Sustainable Communities	Identification of Tilgate Forest Business Park as a Main Employment Area will maintain the existing economic function of the site. The site is not especially accessible from Crawley's neighbourhoods on foot, and bus and private car represent the key means of access. The site does not itself provide facilities or services to support employees, potentially increasing the need to travel. Weighing up the above considerations, in particular that the site already operates as an economic locations, it is not considered that identification of Tilgate Forest Business Park as a Main Employment Area would impact on this indicator. No Impact 0
10. Encourage Active Lifestyles	Although Tilgate Forest Business Park is situated close to K2 Leisure Centre, Broadfield Stadium pitches, and the countryside, its identification as a Main Employment Area will not itself specifically encourage active lifestyles. No Impact 0
Conclusions	Whilst a smaller scale existing main employment area, the capacity and potential to extend adjacent to the SNCI is limited and therefore small scale extensions or intensification is more appropriate. The location as a main employment area and one to be protected against non employment generating development is necessary and appropriate.

Assessment of Employment Sites (Policy EC1-EC3)

Site Name: Broadfield Business Park

Site Description: Broadfield Business Park is located west of Brighton Road (A23) towards the south of Crawley. It is a relatively small and compact employment site comprising good quality modern office accommodation and car parking. The site is bounded by the A23, Broadfield Park Historic Gardens, and Broadfield Stadium, meaning that the scope for future intensification is limited. The site was not formally identified as an employment location in the Core Strategy (2008), but represents an established employment location.

Site Potential Use: The site is identified for a flexible range of employment generating uses that will contribute to the overall economic function of the town.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Mitigate Climate Change & Local Pollution	Broadfield Business Park provides an established employment offer, and its identification as a Main Employment Area will continue to make use of the existing location and provide sustainability benefits through clustering employment uses within an identified area. The site is reasonably accessible from Broadfield on foot, and from the rest of Crawley by bus, though its location at the edge of the urban area potentially increases the need to travel by private car. Weighing up the above considerations, it is recognised that Broadfield Business Park has an established economic function; however, whilst its identification as a Main Employment Area will help protect its employment function, it will not in itself mitigate against the impacts of climate change and local pollution. Therefore its impact is considered to be neutral against this objective. Neutral Impact /
2. Adapt to Climate Change	Continued identification of Broadfield Business Park as a Main Employment Area will not itself specifically bring about the adaptation of the area to climate change. No Impact 0
3. Protect and/or Enhance the Built Environment	Identification of Broadfield Business Park as a Main Employment Area provides the market with a greater choice of accommodation, and therefore reduces the need for employment uses to consider locating in less appropriate areas where there could be scope for a negative impact on the character of the built environment. In this regard, identification of Broadfield Business Park for employment use is viewed as having an uncertain, but potentially positive, impact. Possible Positive or Slight Positive Impact +?
4. Decent/ Affordable Homes	The identification of main employment areas as employment destinations will not directly deliver decent/ affordable homes. However, in contributing to the overall choice of established business destinations in Crawley, the designation of Broadfield Business Park will help the plan to balance the demands of employment and housing, meaning that other locations can be identified as a focus for accommodating housing need. For this reason, continued use of Broadfield Business Park for employment use is viewed as having an uncertain, but potentially positive impact, against this indicator.

SA Objective	Commentary and/or Impact
	Possible Positive or Slight Positive Impact +?
5. Maintain/ Support Employment	Broadfield Business Park is one of several sites identified as a Main Employment Area in the Local Plan, and employment generating development at these locations will be supported. Identification as a Main Employment Area enables a greater focus on employment uses, protecting these locations for economic development to help ensure that employment needs can be accommodated over the Plan period. Significant Positive Impact ++
6. Conserve/ Enhance Biodiversity and Landscape	Broadfield Business Park is situated within the Built-up-Area Boundary, though is situated adjacent to Broadfield Park Historic Gardens. Identification of the site as a Main Employment Area will help to retain the existing employment function of the area within its current curtilage. Therefore, although the park is situated close to an area of biodiversity and landscaping, given that this is an established use, its identification as a Main Employment Area will not impact upon the objective to enhance biodiversity and landscape. No Impact 0
7. Promote Sustainable Journeys	Identification of Broadfield Business Park as a Main Employment Area will maintain the existing economic function of the site. The site is not especially accessible from Crawley's neighbourhoods on foot, and bus and private car represent the key means of access. The site does not itself provide facilities or services to support employees, potentially increasing the need to travel. Weighing up the above considerations, in particular that the site already operates as an economic locations, it is not considered that identification of Broadfield Business Park as a Main Employment Area would impact on this indicator. No Impact 0
8. Provide Sufficient Infrastructure	Broadfield Business Park has a long-standing employment function, and is accessible by a range of transport modes. Given the existing function of the site, its formal identification as a Main Employment Area will not itself deliver, significant infrastructure, though the limited scope for intensification means that significant further infrastructure is unlikely to be required to serve the site. Neutral Impact /
9. Promote Sustainable Communities	Identification of Broadfield Business Park as a Main Employment Area will maintain the existing economic function of the site. The site is reasonably accessible from Broadfield on foot, and from the rest of Crawley by bus, though its location at the edge of the urban area potentially increases the need to travel by private car. The site does not itself provide facilities or services to support employees, potentially increasing the need to travel. Weighing up the above considerations, in particular that the site already operates as an economic locations, it is not considered that its identification as a Main Employment Area would impact against this indicator. No Impact 0
10. Encourage Active Lifestyles	Although Broadfield Business Park is situated close to K2 Leisure Centre, Broadfield Stadium pitches, and Broadfield Park Historic Gardens, its identification as a Main Employment Area will not itself specifically encourage active lifestyles. No Impact 0
Conclusions	Whilst operating as a smaller scale existing Main Employment Area, the capacity and potential to extend adjacent to the historic park and garden, football stadium and residential properties are limited and therefore small scale extensions or intensification are only appropriate. Its retention and protection as a Main Employment Area within the Local Plan is necessary and appropriate.

Assessment of Employment Sites (Policy EC1-EC3)

Site Name: Lowfield Heath

Site Description: Lowfield Heath is a self-contained employment area situated north of Manor Royal, immediately adjoining the southern perimeter of Gatwick Airport. It is characterised by a mix of light industrial and some non B class (hotel) uses, and the existing stock is broadly of good condition, although it's secondary location and poor internal highway layout do present disadvantages. There is limited scope for intensification as the site falls within land protected for Gatwick Airport safeguarding. The area also contains the Grade II* Listed St. Michael and All Saints Church, and is subject to flood risk at the east of the site.

Site Potential Use: The site is identified for a flexible range of employment generating uses that will contribute to the overall economic function of the town.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Mitigate Climate Change & Local Pollution	Lowfield Heath provides an established employment offer, and its identification as a Main Employment Area will continue to make use of the site for economic use, providing sustainability benefits through clustering employment uses within an identified area. The site is not easily accessible from Crawley's neighbourhoods on foot, though is located on the Fastway bus route, and is situated within proximity to Main Employment Areas at Gatwick Airport and Manor Royal. Considering that Lowfield Heath has an already established economic function, although its formal identification as a Main Employment Area will help protect it as an employment location, this will not in itself mitigate against the impacts of climate change and local pollution. Therefore its impact is considered to be neutral against this objective. Neutral Impact /
2. Adapt to Climate Change	Continued identification of Lowfield Heath as a Main Employment Area will not itself specifically bring about the adaptation of the area to climate change. No Impact 0
3. Protect and/or Enhance the Built Environment	Although there is limited scope for intensification, identification of Lowfield Heath as a Main Employment Area provides the market with a greater choice of accommodation, and therefore reduces the need for employment uses to consider locating in less appropriate areas where there could be scope for a negative impact on the character of the built environment. In this regard, identification of Lowfield Heath for employment use is viewed as having an uncertain, but potentially positive, impact. Possible Positive or Slight Positive Impact +?
4. Decent/ Affordable Homes	The identification of main employment areas as employment destinations will not directly deliver decent/ affordable homes. However, in contributing to the overall choice of established business destinations in Crawley, the designation of Lowfield Heath will help the plan to balance the demands of employment and housing, meaning that other locations can be identified as a focus for accommodating housing need. For this reason, continued use of Lowfield Heath for employment use is viewed as having an uncertain, but potentially positive impact against this indicator. Possible Positive or Slight

SA Objective	Commentary and/or Impact
	Positive Impact +?
5. Maintain/ Support Employment	Lowfield Heath is one of several sites identified as a Main Employment Area in the Local Plan, and employment generating development at these locations will be supported. Identification as a Main Employment Area enables a greater focus on employment uses, protecting these locations for economic development to help ensure that employment needs can be accommodated over the Plan period. Significant Positive Impact ++
6. Conserve/ Enhance Biodiversity and Landscape	Lowfield Heath is situated beyond Crawley's Built up Area Boundary adjacent to the southern boundary of Gatwick Airport. Although the site would therefore be considered to represent a countryside location, the employment use is well-established and the location represents a brownfield site. Although there is limited scope for intensification within the site boundary, formal identification of the site as a Main Employment Area will help to retain the existing employment function of the site within its current curtilage. In light of the above, it is not considered that formal identification of the existing economic use as a Main Employment Area would impact upon the objective to enhance biodiversity and landscape. No Impact 0
7. Promote Sustainable Journeys	Identification of Lowfield Heath as a Main Employment Area will maintain the existing economic function of the site. The site is not especially accessible from Crawley's neighbourhoods on foot, with bus and private car representing key means of access. Both this, and a relative absence of facilities or services to support employees, potentially increases the need to travel. However, given that the site is already established as an economic location, it is not considered that the formal identification of Lowfield Heath as a Main Employment Area would impact on this indicator. No Impact 0
8. Provide Sufficient Infrastructure	Given the existing function of the site and limited scope for intensification, the formal identification of Lowfield Heath as a Main Employment Area will not itself necessitate or deliver significant infrastructure. Neutral Impact /
9. Promote Sustainable Communities	Identification of Lowfield Heath as a Main Employment Area will maintain the existing economic function of the site. The site is not situated close to residential areas, and its location beyond the Built up Area Boundary potentially increases the need to travel by private car. The site does not itself provide significant facilities or services to support employees, potentially increasing the need to travel. However, given that the site is already established as an economic destination, it is not considered that its formal identification as a Main Employment Area would impact against this indicator. No Impact 0
10. Encourage Active Lifestyles	Identification of Lowfield Heath as a Main Employment Area will not specifically encourage active lifestyles. No Impact 0
Conclusions	Whilst in close proximity to Gatwick and near to manor Royal, the site is constrained by safeguarding and due to the higher level density of development there is little capacity for extension or intensification. The site is an appropriate Main Employment Area and should be protected and retained.

Assessment of Employment Sites (Policy EC1-EC3)

Site Name: Broadfield Stadium and K2

Site Description: Broadfield Stadium and K2 are situated in the south of Crawley, largely separate from Crawley's urban area. The sites sit opposite one another either side of Brighton Road (A23), adjacent to Broadfield Business Park and Tilgate Forest Business Park respectively. Both sites have an established leisure function, with Broadfield Stadium home to Crawley Town Football Club, and K2 providing a sub-regional sport and recreation offer. Neither site was formally identified for employment use in the Core Strategy (2008), but with leisure and recreation identified within the NPPF definition of economic development, the economic contribution of the sites is recognised in the Local Plan.

Site Potential Use: Recognising the contribution that these out of centre leisure locations provide to the vibrancy and offer of the local economy, the council aims to support their continued presence within the borough. Their continued evolution will be supported where their growth does not conflict with the wider objectives for the town centre and Manor Royal.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Mitigate Climate Change & Local Pollution	Broadfield Stadium and K2 form an established leisure quarter which provides an employment offer. By identifying it as a Main Employment Area the site will continue to retain a key economic role. Mitigation is provided through the benefits of clustering employment uses within an identified area, and reducing traffic movements. The site is easily accessible from Crawley's southerly neighbourhoods on foot, with a limited access to the Fastway bus route, Through its formal identification as a Main Employment Area will help protect it as a leisure location, this may mitigate against the impacts of climate change and local pollution, but will definitely not exacerbate them further and therefore its impact is considered to be marginally positive against this criteria. Possible Positive or Slight Positive Impact +?
2. Adapt to Climate Change	Identification as a Main Employment Area will not itself specifically bring about the adaptation of the area to climate change. No Impact 0
3. Protect and/or Enhance the Built Environment	Whilst the retention of the area as a main employment area is appropriate and existing buildings may be protected or enhanced throughout the plan period, the need to utilise other more important areas may be mitigated. In this regard, continued use of the area for leisure use is viewed as having an uncertain, but potentially positive, impact. Possible Positive or Slight Positive Impact +?
4. Decent/ Affordable Homes	The identification of Main Employment Areas as employment destinations will not directly deliver decent/ affordable homes. However, in contributing to the overall choice of established business destinations in Crawley, the designation of the Broadfield Stadium/K2 quarter will help the Local Plan to balance the demands of employment and housing, meaning that other locations can be identified as a focus for accommodating housing need. For this reason the protecting of the area for employment generating use is viewed as having an uncertain, but potentially positive impact against this indicator.

SA Objective	Commentary and/or Impact
	Possible Positive or Slight Positive Impact +?
5. Maintain/ Support Employment	As one of several sites identified as a Main Employment Area in the Local Plan, employment generating development at these locations will be supported. Identification as a Main Employment Area with a particular focus on leisure will help Crawley accommodate its leisure needs, and enables a greater focus on employment uses, protecting these locations for economic development to help ensure that employment needs can be accommodated over the Plan period. Significant Positive Impact ++
6. Conserve/ Enhance Biodiversity and Landscape	Although there is limited scope for intensification within the site boundary, formal identification of the site as a Main Employment Area will help to retain the existing employment function of the site within its current curtilage. In light of the above, it is not considered that formal identification of the existing leisure use as a Main Employment Area would impact upon the objective to enhance biodiversity and landscape. No Impact 0
7. Promote Sustainable Journeys	Identification of Broadfield Stadium/K2 quarter as a Main Employment Area will maintain the existing economic function of the site. The site is not especially accessible from Crawley's neighbourhoods on foot, and bus and private car represent the key means of access. The site does not itself provide facilities or services to support employees, other than those that exist on site, potentially increasing the need to travel. Weighing up the above considerations, in particular that the site already operates as an economic locations, it is not considered that identification of Broadfield Stadium/K2 quarter as a Main Employment Area would impact on this indicator. Neutral Impact /
8. Provide Sufficient Infrastructure	Given the existing function of the site and limited scope for intensification, the formal identification of Broadfield Stadium/K2 quarter as a Main Employment Area will not itself necessitate or deliver significant infrastructure. Neutral Impact /
9. Promote Sustainable Communities	Identification of Broadfield Stadium/K2 quarter as a Main Employment Area will maintain the existing leisure function of the site. The site is reasonably accessible from Broadfield and Southgate on foot, and from the rest of Crawley by bus, though its location at the edge of the urban area potentially increases the need to travel by private car. The site does not itself provide facilities or services other than those existing to support employees, potentially increasing the need to travel. Weighing up the above considerations, in particular that the site already operates as an economic locations, it is not considered that its identification as a Main Employment Area would impact against this indicator. No Impact 0
10. Encourage Active Lifestyles	As regional leisure hubs both sites are critical to achieving active lifestyles for those that live and work in Crawley and therefore the retention and protection of the area should be significantly positive. Significant Positive Impact ++
Conclusions	Identification of the Broadfield Stadium/K2 quarter as a Main Employment Area will help to protect the valuable leisure function of this site. In doing so, the site contributes to the overall economic vitality of Crawley, and provides significant sustainability benefits.

Assessment of Employment Sites (Policy EC1-EC3)

Site Name: The Hawth

Site Potential Use: Leisure Quarter for theatre and amphitheatre

Site Description: Located adjacent to Southgate playing fields and accessible by foot from Three Bridges, Furnace Green and Southgate. The site lends itself to car access and is adjacent to ancient woodlands.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Mitigate Climate Change & Local Pollution	The Hawth is an established leisure destination which provides an employment offer. By identifying it as a Main Employment Area the Local Plan will ensure that the site continues to perform a key economic role. The site can be accessed from Crawley's Town centre and adjacent neighbourhoods on foot, whilst also benefiting from access to the Fastway bus route. Although its formal identification as a Main Employment Area may not fully mitigate against the impacts of climate change and local pollution, it will definitely not exacerbate them further, and therefore its impact is considered to be marginally positive against this objective. Possible Positive or Slight Positive Impact +?
2. Adapt to Climate Change	Identification as a Main Employment Area will not itself specifically bring about the adaptation of the area to climate change. No Impact 0
3. Protect and/or Enhance the Built Environment	The protection of the area as it stands alongside the ancient woodland adjacent and open space of Southgate playing fields shows the level of protection and importance of the environs at The Hawth. Whilst the retention of this location as a Main Employment Area is appropriate and existing buildings may be protected or enhanced throughout the plan period, the need to utilise other more important areas may be mitigated. In this regard, continued use of the area for employment use is viewed as having an uncertain, but potentially positive, impact. Possible Positive or Slight Positive Impact +?
4. Decent/ Affordable Homes	Identification of The Hawth as a Main Employment Area will not directly affect the delivery of decent/ affordable homes. However, in contributing to the overall choice and provision of established economic destinations in Crawley, its designation will help the Local Plan to balance the demands of employment and housing, meaning that other locations can be identified as a focus for accommodating housing need. For this reason, the protection of the area for employment generating use is viewed as having an uncertain, but potentially positive impact against this indicator. Possible Positive or Slight Positive Impact +?
5. Maintain/ Support Employment	As one of several sites identified as a Main Employment Area in the Local Plan, the site contributes to the overall stock of economic development sites in Crawley, and through focussing specifically on leisure, adds to the diversity of the town's offer. Positive Impact +
6. Conserve/	Although there is some scope for intensification within the site boundary, formal identification of the site as a Main

SA Objective	Commentary and/or Impact
Enhance Biodiversity and Landscape	Employment Area will help retain the existing leisure function of the site within its current curtilage. Retention of elements of the site covered by ancient woodland and natural designations limit the scope for intensification of the main commercial leisure use, though formal identification of the existing economic use as a Main Employment Area will not itself impact upon the objective to enhance biodiversity and landscape. No Impact 0
7. Promote Sustainable Journeys	Identification The Hawth as a Main Employment Area will retain the existing economic function of the site. The site is not especially accessible from Crawley's neighbourhoods on foot, and bus and private car represent the key means of access. The site does not itself provide facilities or services to support employees, other than those that exist on site, potentially increasing the need to travel. Weighing up the above considerations, in particular that the site already operates as an established leisure location, it is not considered that identification of The Hawth as a Main Employment Area would impact against this objective. No Impact 0
8. Provide Sufficient Infrastructure	Given the existing function of the site and limited scope for intensification, formal identification of The Hawth as a leisure focussed Main Employment Area will not itself necessitate or deliver significant infrastructure. Neutral Impact /
9. Promote Sustainable Communities	The Hawth is not situated in a highly sustainable location, but access by foot can be made from both Three Bridges and Crawley Railway Stations. It benefits from existing public transport, cycling, and access via foot. It is however also heavily dependent on vehicular access by private car and this will continue to have a negative impact in climate change mitigation terms. Weighing up the above, it is considered that the overall impact of the site against this objective is neutral. Neutral Impact /
10. Encourage Active Lifestyles	The Hawth promotes access to active lifestyles through dance and movement and the theatre role of the buildings, as well as direct links to its outside space and the proximity to Southgate playing fields. Positive Impact +
Conclusions	Identification of The Hawth as a Main Employment Area will help to protect the valuable leisure function of this site. In doing so, the site contributes to the overall economic vitality of Crawley, and provides significant sustainability benefits.

Assessment of Employment Opportunities: Potential Areas of Growth (Policy EC1)

Site Name: Area of Search (land North of Manor Royal (including land east of London Road, Southways and Jersey Farm, and land North of the North East Sector) and land to the North of the North East Sector (including land South of M23 Junction 9A).

Site Description: This is identified as the Area of Search on the Local Plan Key Diagram. North of Manor Royal, the area comprises of a number of fields dispersed with a few residential properties along Poles Lane, a cluster of commercial properties as part of Southways, and ribbon development along London Road including Gatwick Manor Hotel and Portakabin. The Eastern aspect the Area of Search is characterised by predominately open space and fields, but with Ribbon development along Balcombe Road. A mix of commercial properties is situated in proximity to the airport, whilst to the south, new residential areas will be developed as part of the North east Sector. The area is identified within the Local Plan as countryside and is largely subject to Gatwick Airport safeguarding.

Site Potential Use: Land that is not safeguarded at the periphery of Manor Royal may offer short-term opportunities to accommodate appropriate extensions to Manor Royal, whilst the wider Area of Search may offer broad opportunities for identification of land for economic development use during the plan period, subject to a formal decision on safeguarding. In terms of identifying sustainable development locations, the preference will be to development the most sustainable locations within the Area of Search, particularly those which possess clear linkages to Manor Royal.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Mitigate Climate Change & Local Pollution	The Area of Search is situated beyond the Built up Area Boundary in a countryside location, and largely represents a greenfield site. Although development within the Area of Search would result in a part loss of greenfield land, it is also recognised that the area is sustainably located with opportunities to link with existing Main Employment Areas at Manor Royal and Gatwick Airport. Although new economic development will potentially increase the need to travel, development in the Area of Search represents an opportunity to cluster economic growth, whilst providing opportunity to benefit from existing sustainable transport links. The greenfield nature of the site provides scope to further encourage sustainability through presenting the opportunity for highly sustainable new build development. On this basis, although it is recognised that the development of greenfield land can potentially have a negative impact in terms of climate change and local pollution, the development itself will provide opportunities to offset this impact. The site is therefore likely to have a neutral impact against this indicator. Neutral Impact /
2. Adapt to Climate Change	Identification of site(s) as an extension to Manor Royal would represent the most sustainable option, and though this would result in urban extension onto greenfield land, development could be designed with climate change adaptation in mind. Strategic employment development within the wider Area of Search potentially brings an area of greenfield land into development, though strategic level new build could itself be sustainably designed in order to facilitate adaptation to climate change. On this basis it is considered that development offers scope to respond positively to climate change

SA Objective	Commentary and/or Impact
	through the planning process. Positive Impact +
3. Protect and/or Enhance the Built Environment	There is significant demand for additional floorspace to meet identified employment, and specifically business needs. The Local Plan is clear that the use of existing Main Employment Areas will be maximised before sites at the periphery of Crawley are brought forward. However, should development come forward within the Area of Search, Local Plan policy will require that the principles of good design are adhered to. Any potential new development would need to have regard to its surroundings and enhance the overall aesthetics of the built environment, and it is therefore considered that development in the Area of Search could contribute positively against this objective. Positive Impact +
4. Decent/ Affordable Homes	The identification of main employment areas as employment destinations will not directly deliver decent/ affordable homes. However, in contributing to the overall choice of established business destinations in Crawley, designation the Area of Search will help the plan to balance the demands of employment and housing, meaning that other more suitable locations can be identified as a focus for accommodating housing need. For this reason, identifying of the Area of Search for employment generating use is viewed as having an uncertain, but potentially positive impact against this indicator. Possible Positive or Slight Positive Impact +?
5. Maintain/ Support Employment	Development within the Area of Search, either as an extension to Manor Royal or a stand alone complementary employment destination, will help the council in addressing significant demand for employment, and specifically business, land. Any additional employment development brought forward within the Area of Search will complement the established role and function of Manor Royal, and will promote sustainable economic growth in Crawley. This will promote the overall economy of Crawley and wider Gatwick Diamond, attracting new business, and facilitating the expansion of existing business, to enable Crawley to meet its economic potential. As such, economic development within an identified Area of Search, presents a significant opportunity to maintain and positively enhance the employment function of Crawley. Significant Positive Impact ++
6. Conserve/ Enhance Biodiversity and Landscape	The Area of Search is broad in its geographical scope, covering the much northern part of Crawley. The area is therefore varied in terms of its biodiversity value and landscape character, ranging from low grade farmland to areas of SNCI/Local Nature Reserve and Ancient Woodland/hedgerows. Development of greenfield land is likely to be negative in terms of its impact on biodiversity and landscape, although a well located and designed development can be brought forward in a manner that minimises an uncertain, but potentially negative impact against this objective. Possible Positive or Slight Positive Impact +?
7. Promote Sustainable Journeys	Development in the Area of Search will extend the existing and/or create a new employment destination which will inevitably increase the need to travel. However, a sustainable location within Crawley's boundary and close to existing Main Employment Areas and neighbourhoods presents an opportunity to link into established bus routes and maximise pedestrian linkages. On this basis it is considered that development in the Area of Search would perform positively against this indicator. Positive Impact +
8. Provide Sufficient	The Area of Search represents a semi-rural location that is characterised in part by small-scale pepper potted commercial and residential development. The critical mass of larger scale employment development may therefore create opportunity

SA Objective	Commentary and/or Impact
Infrastructure	for a wider provision of infrastructure, though this would be dependant on scale, and development may not necessitate or deliver significant infrastructure. Neutral Impact /
9. Promote Sustainable Communities	Development within the Area of Search, either as an extension to Manor Royal or a stand alone complementary employment destination, would be well placed to link with existing Main Employment Areas at Manor Royal and Gatwick Airport. Parts of the Area of Search also present clear opportunities to reinforce links to the neighbourhoods of Langley Green and Three Bridges. Both mean that development within the Area of Search will be well placed to draw on existing sustainable transport links, and identification of the Area of Search is therefore considered to perform positively against this indicator. Positive Impact +
10. Encourage Active Lifestyles	Development within the Area of Search will create opportunities to strengthen links between Main Employment Areas, the countryside, and open/recreation space at Manor Royal. Likewise, development would also create opportunities to link into and enhance the existing pedestrian and cycle network, whilst offering scope to contribute to the encouragement of healthy lifestyles through the design process. In this regard there is considered to be scope for positive impact against this indicator. Positive Impact +
Conclusions	As an extension to the main employment area of the town, or as a site for Strategic Employment Location(s) to meet the needs of Crawley as a sub regional employment destination, the Area of Search is the most sustainable and practical location for development. It is a large area of land take, and some areas within the broad identified area will be more sustainable than others. It would enable new development to build on the existing strengths of the area, and offers opportunities to deliver linkages with the existing residential and business communities. Current safeguarding constraints limit the scope for development in the immediate term for the entire area, though small scale employment extensions in areas outside of safeguarding should be considered in the first instance.

Assessment of Rejected Sites

Name: East of Brighton Road

Site Potential Use: Employment

Description: Countryside location. Greenfield. South of the borough, adjacent to the junction with the M23/A23. Majority of the land is in the Forestry Commission ownership with an element of private ownership adjacent to A23.

To the south west of Tilgate Park in the south of the borough is an area of countryside and mature woodland, identified at the Tilgate/Worth Forest Rural Fringe in submission Local Plan Policy CH9. It is largely separate from Crawley's urban area. The land abuts the A23 to the west, with the junction with the A264 to the south west. The East of Brighton Road site had been considered as a potential housing and employment location in the Core Strategy (2008), given the existing Tilgate Business Park, adjacent, which represents an established employment location comprising a cluster of good quality office accommodation. The site was also suggested at preferred strategy consultation stage (2012) as potential for Employment or Housing, and was subject to public consultation during the Additional Sites consultation (2013).

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The area is heavily wooded and is an SNCI and a Biodiversity Opportunity Area, with some areas of ancient woodland. Main access to any development would need to be considered off the M23 or A23 and would be a considerable distance from Crawley's neighbourhoods and local facilities by foot or cycle. The private car represents the most likely means of access, negatively impacting on pollution and climate change. The loss of greenspace and woodland would also negatively impact on climate change and pollution mitigation. The location away from the majority of public transport and other larger urban areas is considered unsustainable. Significant Negative Impact (--)
2. Adapt to Climate Change	The loss of trees, natural surrounds and loss of greenspace means there would be a negative impact on adaptation to climate change. Significant Negative Impact (--)
3. Protect and/or Enhance the Built Environment	The allocation of the area as a Main Employment Area would provide the market with a greater choice of commercial locations. However, the area forms an important element of the town's structural landscaping and provides an attractive setting for the southern neighbourhoods. Long distance views towards the area from various viewpoints within the built up area, as protected by submission Local Plan Policy CH8, would be adversely affected by development. Therefore, the high value of the contribution this area makes to the surrounding built environment would outweigh the benefits of any employment generating development. In this regard, identification of East of Brighton Road is viewed as having a negative impact. Negative Impact (-)

SA Objective	Commentary and/or Impact
4. Decent/ Affordable Homes	The identification of the site as a Main Employment Area would not deliver any housing or affordable homes. Significant Negative Impact (--)
5. Maintain/ Support Employment	East of Brighton Road is adjacent to Tilgate Forest Business Park which is one of several sites identified as a Main Employment Area in the Local Plan. Extensions of this Business Park for employment generating development would help address unmet need currently identified in the Plan. Significant Positive Impact (++)
6. Conserve/ Enhance Biodiversity and Landscape	East of Brighton Road is situated outside the Built-Up Area Boundary, within an area of countryside and mature woodland, including areas of ancient woodland. The site is identified as an SNCI and a Biodiversity Opportunity Area. Identification of the site as a Main Employment Area will significantly adversely impact on the objective to conserve and enhance biodiversity, and will detract from its value as an area of structural landscaping. Significant Negative Impact (--)
7. Promote Sustainable Journeys	Identification of East of Brighton Road as a Main Employment Area would lead to car borne journeys, as the majority of the site is not accessible from Crawley's neighbourhoods on foot, and bus. Main access to any development would be from the A23 or M23 and, therefore, it is likely that car access would be dominant, and its location adjacent to the strategic road network means in-commuting by car is likely to be encouraged. If the site did not itself provide facilities or services to support employees, this would also potentially increase the need to travel. Significant Negative Impact (--)
8. Provide Sufficient Infrastructure	East of Brighton Road is a large area currently undeveloped, with considerable environmental constraints. Further infrastructure will be required to serve the site and at this time there is no evidence that this can/would be provided or sufficient. Uncertain Impact (?)
9. Promote Sustainable Communities	Identification of East of Brighton Road as a Main Employment Area will enhance the existing economic function of the town, but at the expense of a significant greenspace with important environmental features. The majority of the area is not easily accessible from Crawley's neighbourhoods on foot, and private car represents the most likely means of access. The site is unlikely to provide facilities or services to support employees, potentially increasing the need to travel, and given access may be off the main external road network this may support a wider catchment than the town and increase in-commuting. Negative Impact (-)
10. Encourage Active Lifestyles	The loss of open space and recreational opportunities for walking and cycling in this area, which acts as an extension to Tilgate Country Park would undermine the encouragement of active lifestyles. Significant Negative Impact (--)
Conclusions	The location as a Main Employment Area and the provision of employment generating floorspace needs to be considered against the significant negative impact its development would have on one of the most important environmental assets in the borough. The site is also disconnected from the southern neighbourhoods and is unlikely to be able to support local facilities so it would not be a sustainable development.

Assessment of Rejected Sites

Name: Tilgate Country Park

Site Potential Use: Employment

Description: Countryside location. Greenfield. South of the borough, adjacent to Tilgate, Furnace Green and Maidenbower neighbourhoods abutting the M23. Land in council ownership.

To the south of the borough is Tilgate Park, an area of countryside and mature woodland, with a golf course, lake and recreational facilities and open space. Identified at the Tilgate/Worth Forest Rural Fringe in submission Local Plan Policy CH9, it is largely separate from Crawley's urban area. The land abuts the Tilgate Forest Business Park to the west, the M23 to the east at its junction with the A264.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The Tilgate Country Park is heavily wooded, with areas of ancient woodland. Development would lead to a significant loss of trees, negatively impacting on climate change. The site is an SNCI and a Biodiversity Opportunity Area, and has areas designated as historic park and garden, as well as significant water features such as Tilgate Lake and Titmus Lake. Main access to any development would need to be considered off the M23 or A23. The part of the site accessible on foot to the southern neighbourhoods of Tilgate and Furnace Green and Maidenbower, to the east, is an important recreational/open green space asset for the borough. The southern parts of the site are located adjacent to the M23/A23 meaning that the private car represents the most likely means of access to these areas, negatively impacting on pollution and climate change. The loss of greenspace and woodland would also negatively impact on pollution and climate change. Significant Negative Impact (--)
2. Adapt to Climate Change	The loss of trees, natural surrounds and loss of significant and high quality greenspace means there would be a negative impact on adaptation to climate change. Development is also likely to adversely affect the important role the lakes form in the Upper Mole Flood Alleviation Scheme. Significant Negative Impact (--)
3. Protect and/or Enhance the Built Environment	The allocation of Tilgate Country Park as a Main Employment Area could provide the market with a greater choice of locations. However, the area forms an important element of the town's structural landscaping and provides an attractive setting for the southern neighbourhoods. Long distance views towards the area from various viewpoints within the built up area, as protected by submission Local Plan Policy CH8, would be adversely affected by development. There are also a few historic buildings within the area that are important in the historic parkland and are protected as part of the Local Plan. Therefore, the high value of the contribution this area makes to the surrounding built environment would outweigh the benefits of any employment generating development. Significant Negative Impact (--)

SA Objective	Commentary and/or Impact
4. Decent/ Affordable Homes	The identification of the site as a Main Employment Area would not deliver any housing or affordable homes. Significant Negative Impact (--)
5. Maintain/ Support Employment	Tilgate Country Park is adjacent to Tilgate Forest Business Park. This is one of several sites identified as a Main Employment Area in the Local Plan. Extensions of this Business Park for employment generating development would help address unmet need currently identified in the Plan. Significant Positive Impact (++)
6. Conserve/ Enhance Biodiversity and Landscape	Tilgate Country Park is situated outside the Built-Up Area Boundary, within an area of countryside and mature woodland, including areas of ancient woodland. It is identified as an area of Structural Landscaping, and is designated as an SNCI and a Biodiversity Opportunity Area. Identification of the site as a Main Employment Area will significantly adversely impact on the objective to conserve and enhance biodiversity, and will detract from its value as an area of structural landscaping. Significant Negative Impact (--)
7. Promote Sustainable Journeys	Identification of Tilgate Country Park as a Main Employment Area will lead to car borne journeys, as the majority of the site is not accessible from Crawley's neighbourhoods on foot and bus. Main access to any development would be from the A23 or M23, and, therefore, it is likely that car access is likely to be encouraged. Also if the site did itself not provide facilities or services to support employees, this would also potentially increase the need to travel. Significant Negative Impact (--)
8. Provide Sufficient Infrastructure	Tilgate Country Park is a large area currently undeveloped, with considerable environmental constraints. Further infrastructure will be required to serve the site and, at this time, there is no evidence that this can/would be provided or sufficient. Uncertain Impact (?)
9. Promote Sustainable Communities	Identification of Tilgate Country Park as a Main Employment Area will enhance the existing economic function of the town, but at the expense of significant greenspace that is the most important outdoor recreational space in the borough, as well as including important environmental features and historic buildings. The majority of the area is not accessible from Crawley's neighbourhoods on foot, and private car represents the most likely means of access, increasing the need to travel. The site's location adjacent to the strategic road network may support a wider catchment and increase in-commuting to the borough. Negative Impact (-)
10. Encourage Active Lifestyles	Tilgate Country Park is one of the most important recreational assets in the borough, with facilities including a golf course, driving range, Go Ape, watersports, extensive walking and running routes, cycle and mountain bike routes, bridleways, nature centre and an outdoor gym. It is also in close proximity to the K2 Crawley leisure centre, Broadfield Stadium pitches and the wider countryside in the AONB to the south. Its development would undermine the encouragement of active lifestyles. Significant Negative Impact (--)
Conclusions	The allocation of the site as a Main Employment Area and the provision of employment generating floorspace needs to be considered against the significant negative impact its development would have on one of the most important environmental assets in the borough.

APPENDIX H: ENGAGEMENT PARTNERS

All relevant stakeholders were consulted during the preparation of the Local Plan and Sustainability Appraisal. The SA was carried out 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 approached directly to assist with the Sustainability Appraisal of Options, the Preferred Option for the Local Plan and the final submission 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:

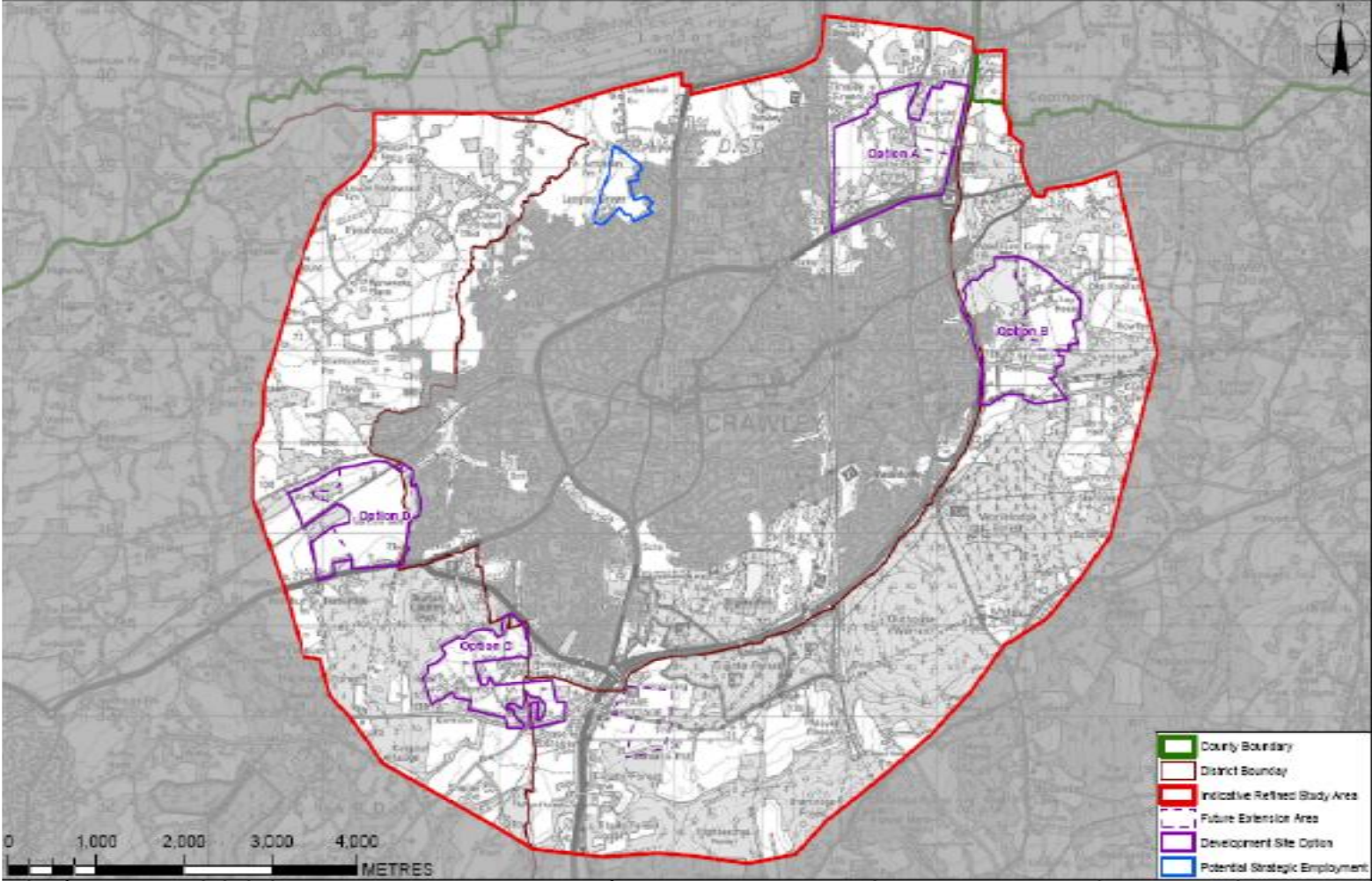
Transport and infrastructure
Education
Minerals and Waste

Minority Forums:

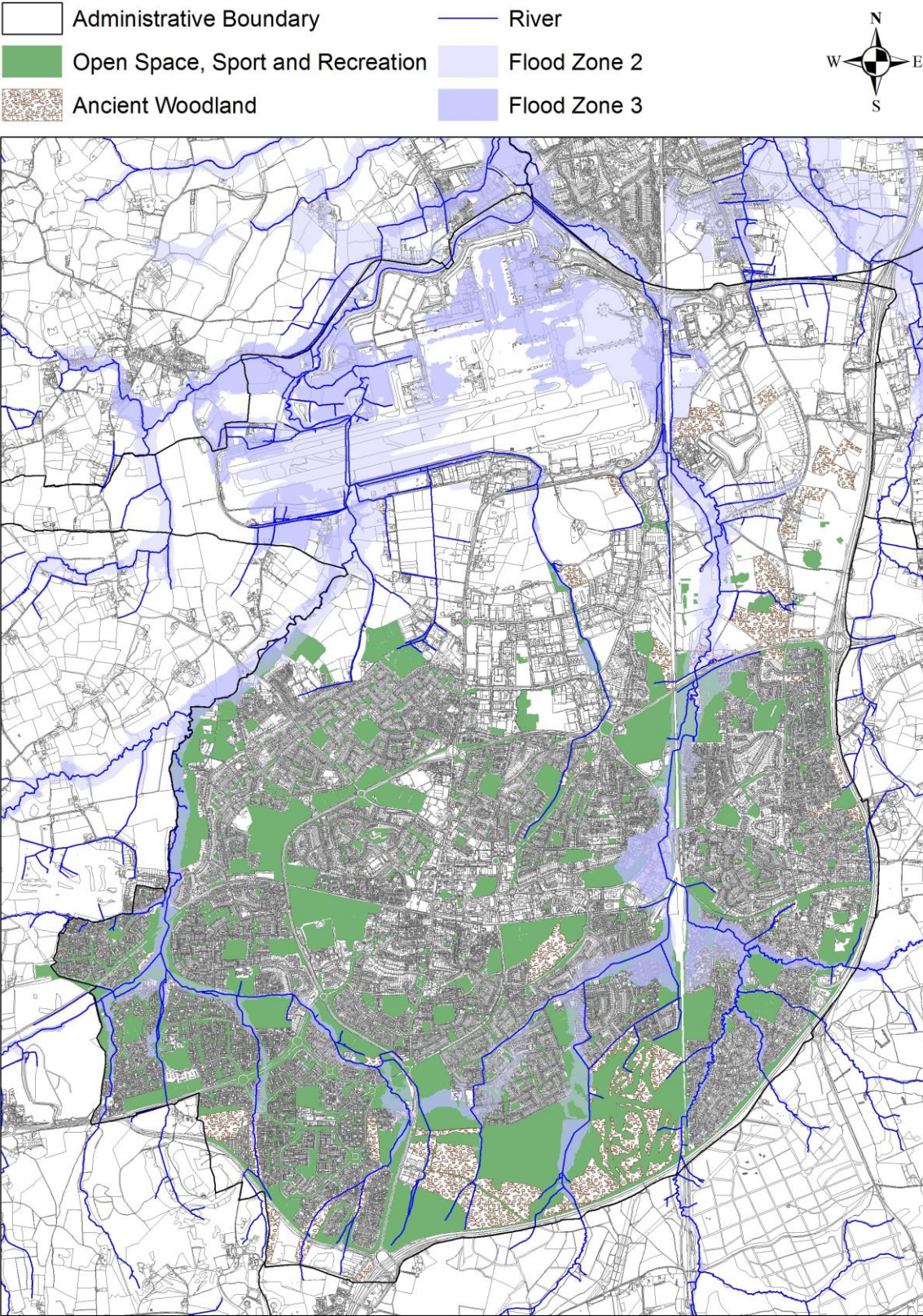
Older People
Ethnic Minorities
Disabled People
Young Mothers

APPENDIX I: MAPS

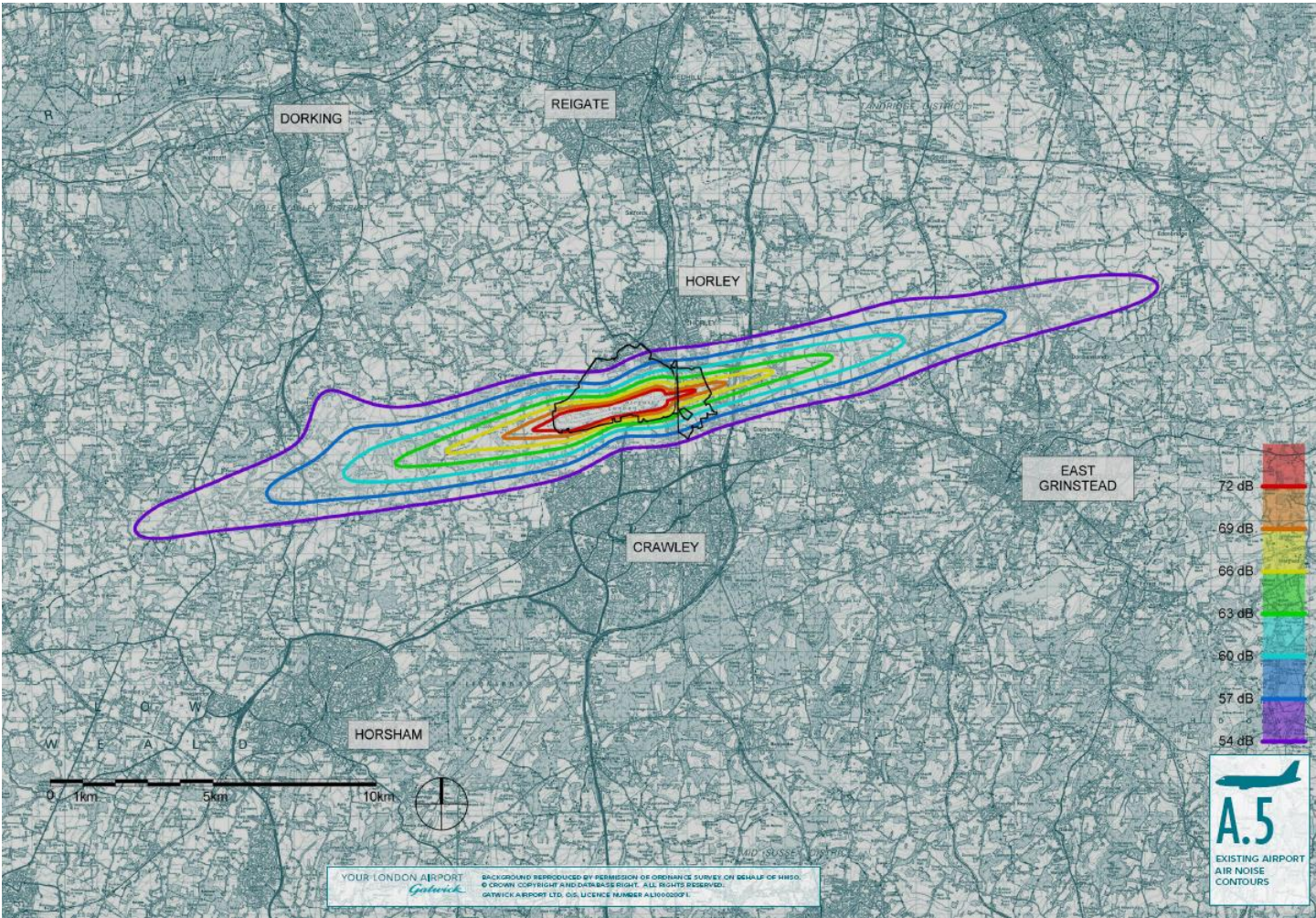
Area of study for future strategic development impact (GL Hearn 2009)



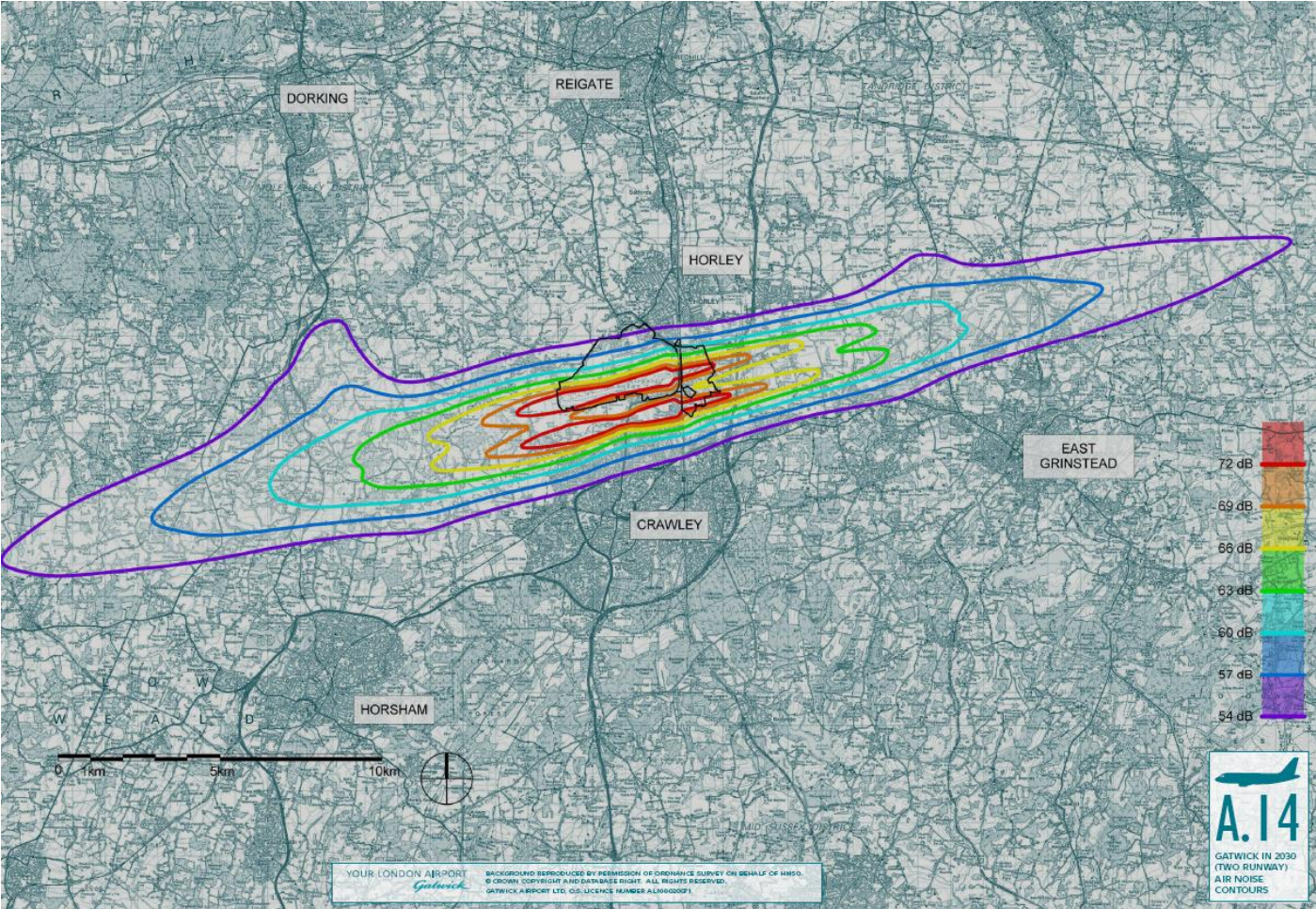
Flood Zones, Amenity Green Space and Ancient Woodland in Crawley



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

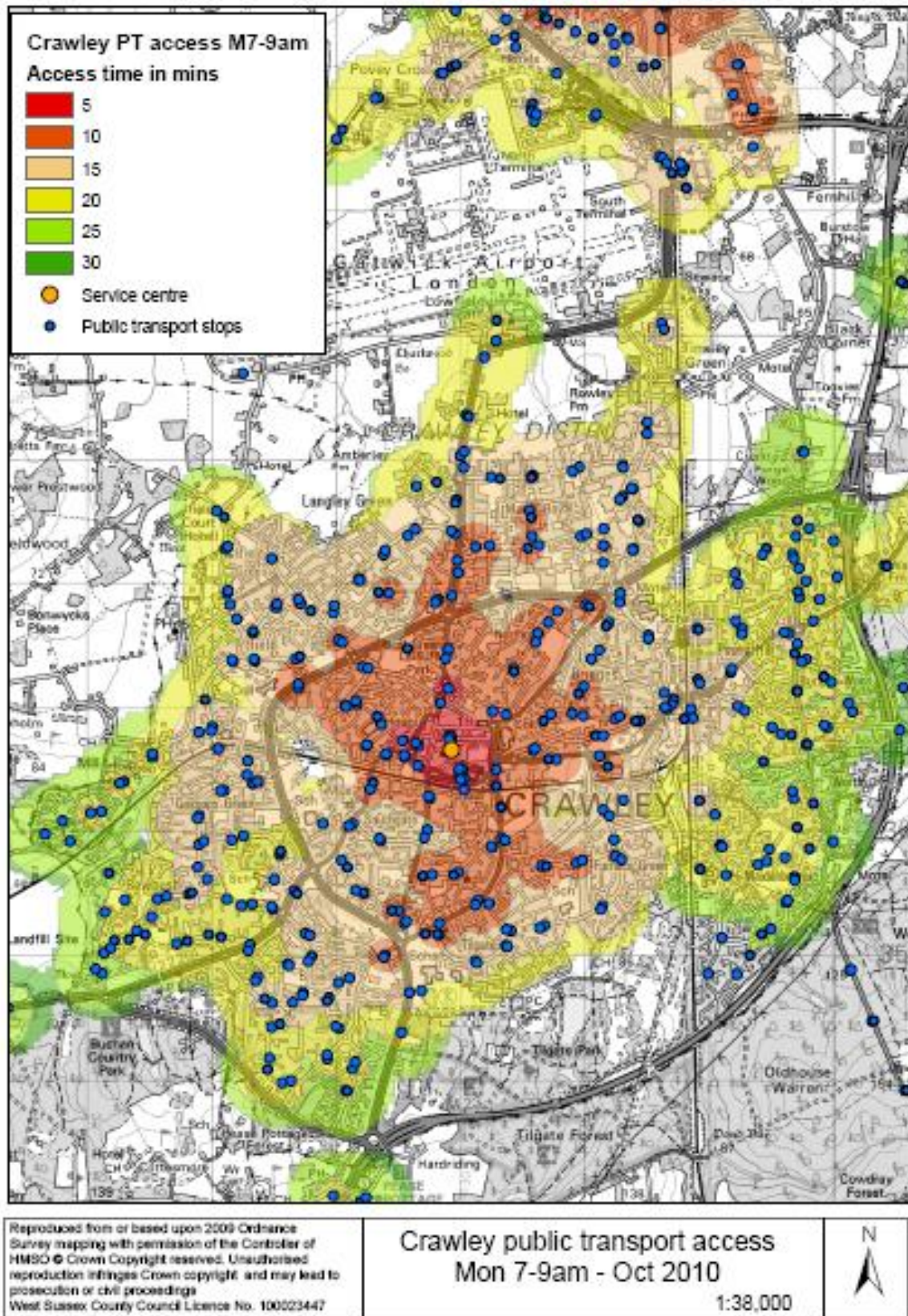


Gatwick Airport Noise contours 2030 (two runways)



(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)

