

**Crawley Borough Council**

**Sustainability Appraisal/ Strategic  
Environmental Assessment  
Screening Report**

**Sustainability Report for the Land East of  
Balcombe Road/Street Hill, Worth  
Development Brief**

Consultation Draft

**November 2018**



## Consultation Procedure

Responses to this Draft Screening Statement should be sent to:

Forward Planning  
Crawley Borough Council  
Town Hall  
The Boulevard  
Crawley Borough Council RH10 1UZ

Or by Email: [forward.planning@ Crawley.gov.uk](mailto:forward.planning@ Crawley.gov.uk)

Responses should be made in writing and received by the council by 21 December 2018.

This Draft Screening Statement has been issued to:

- **The Environment Agency**
- **Natural England**
- **Historic England**

## 1. Introduction

- 1.1 This statement sets out Crawley Borough Council's (the council) draft determination under Regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004 (which transposed EC Directive 2001/42/EC) on whether or not a Strategic Environmental Assessment (SEA) is required for the draft Land East of Balcombe Road/Street Hill, Worth Development Brief Supplementary Planning Document (SPD).
- 1.2 Under separate legislation (the Planning and Compulsory Purchase Act 2004 and associated Regulations), the council must also carry out a Sustainability Appraisal (SA) for all Development Plan Documents (DPDs). This process is designed to consider the environmental, social and economic impacts of the proposed plan/document.
- 1.3 The adopted Crawley Borough Local Plan<sup>1</sup> was accompanied by a full Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA), which was prepared iteratively alongside the Plan at each stage<sup>2</sup>.
- 1.4 Whilst the Planning Act 2008 and Town and Country Planning (Local Development) (England) Regulations 2012 remove the requirements for a SA to be produced for all SPDs, the council is still required to screen its SPDs to ensure that the legal requirements for sustainability appraisals are met where there are impacts that are not covered in the appraisal of a parent DPD or where an assessment is required by the SEA regulations.
- 1.5 This document assesses whether or not a SA and/or SEA is required for the draft SPD. Where the council determines that a SEA is not required then, under Regulation 9(3), the council must prepare a statement setting out the reasons for this determination. **This Statement is Crawley Borough Council's Draft Regulation 9(3) statement.**

## 2. Background to the Development Brief

- 2.1 The Land East of Balcombe Road/Street Hill Development Brief (SPD) has been prepared to support the delivery of a site allocated for development and enhancement by Policy H2: Key Housing Sites of the Crawley Borough Local Plan. The site is allocated as a Key Housing, Biodiversity and Heritage Site. In setting out the expectations from development proposals for this site, the Policy confirms the requirements will be set out in full in a Development Brief. The SPD will not in itself set the level of development or allocate land.
- 2.2 The Crawley Borough Local Plan is the 'parent DPD' which has been subject to SA incorporating SEA. Policy H2 has been subject to detailed SA/SEA options and appraisals<sup>3</sup>. In addition, the allocation site was subject to detailed SA/SEA assessment<sup>4</sup>. These are extracted and set out in Appendix 1 to this Screening Report.
- 2.3 The SA/SEA assessment of the allocation of this site for housing, as part of the Inspector's Main Modifications for the Crawley Borough Local Plan<sup>5</sup>, concluded that the development of this site was predicted to have significant negative harm on two of the SA Objectives: 3. Protect and/or Enhance the Built Environment and 6. Conserve/Enhance Biodiversity and Landscape. In

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<sup>1</sup> Crawley Borough Local Plan (December 2015) CBC: [Crawley Borough Local Plan \(2015-2030\)](#)

<sup>2</sup> [Sustainability Appraisal/Strategic Environmental Assessment Post Adoption Statement](#)  
[Sustainability Appraisal/Strategic Environmental Assessment](#) (December 2015) CBC

<sup>3</sup> Sustainability Appraisal/Strategic Environmental Assessment: Sustainability Report for the Local Plan, Appendix F: Submission Local Plan Policies Options and Appraisal, Policy H2: Key Housing Sites, pages 160-162 (December 2015) CBC

<sup>4</sup> Sustainability Appraisal/Strategic Environmental Assessment: Sustainability Report for the Local Plan, Appendix G: Submission Local Plan Site Allocations and Designations Appraisal, pages 240-241 (December 2015) CBC

<sup>5</sup> Report on the Examination into the Crawley Borough Local Plan 2015-2030, paragraphs 49-57, pages 15-17 of the Report, and MM33 and MM34, pages 12-17 of Appendix (November 2015) M.Pike Planning Inspectorate: [Inspector's Report into the Crawley Borough CBLP Main Modifications Appendix](#)

addition, the assessment highlighted the potential for a negative impact on the SA Objective 2. Adapt to Climate Change. The site assessment concludes that:

*“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 is essential that appropriate mitigation measures are in place and secured to limit the negative impacts of development, particularly in terms of maintaining the rural character of the conservation area and vicinity of the Listed Church outside the built up area boundary and in relation to the biodiversity of the SNCI and heritage assets including the historic park and garden and the archaeologically sensitive moat”.*

- 2.4 In assessing the chosen option for Policy H2, the SA/SEA highlighted that *“impacts on heritage and biodiversity must be mitigated against through strong design and management criteria”*. The commentary for this Option goes on to confirm that:

*“By providing more detail within the Policy in relation to some of the sites which have particular constraints or opportunities, 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...*

*... One of the allocation sites is likely to have some negative impact on the site specific nature conservation and heritage assets. Mitigation against this will be achieved by including detailed criteria and linking it to the preparation of a development brief”.*

- 2.5 The draft Land East of Balcombe Road/Street Hill, Worth Development Brief SPD has been prepared as a response to this requirement.

### 3. The Strategic Environmental Appraisal Process

- 3.1 The first stage of the process is for the council to determine whether or not the draft SPD is likely to have significant effects on the environment. This screening process includes assessing the SPD against a set of criteria (as set out in Schedule 1 of the Regulations). The results of this have been set out in Table 1 below. The aim of this Statement is to provide sufficient information to demonstrate whether the SPD is likely to have significant environmental effects.

**TABLE 1: SEA Screening for the draft Land East of Balcombe Road/Street Hill, Worth Development Brief SPD**

Criteria (Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004)	Crawley Borough Council’s Response
1. Characteristic of the plan or programme	
(a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.	The Development Brief SPD provides more detail to the policies and principles established within the Crawley Borough Local Plan (which has been subject to SA incorporating SEA), particularly Policy H2. The purpose of the SPD is to set a framework for the policy’s implementation and mitigate against the identified harm from the site’s development.

<p style="text-align: center;"><b>Criteria</b></p> <p><b>(Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004)</b></p>	<p style="text-align: center;"><b>Crawley Borough Council's Response</b></p>
<p>(b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy.</p>	<p>The SPD is at the lower tier of the development plan hierarchy, as it sits underneath the Crawley Borough Local Plan. The purpose of the document is to supplement the policies in the Crawley Borough Local Plan and to guide the preparation and determination of an associated planning application for the allocation site. It does not influence any other planning documents.</p>
<p>(c) the relevance of the plan or programme for the integration of housing standards in particular with a view to promoting sustainable development.</p>	<p>The draft SPD expands upon the criteria set out in the Crawley Borough Local Plan (including, but not restricted to, Policy H2) in specific relation to this site. This includes seeking to mitigate against identified harm to SA objectives and promote opportunities for enhancement where possible.</p>
<p>(d) environmental problems relevant to the plan or programme.</p>	<p>The SA/SEA assessment for the site's allocation in the Crawley Borough Local Plan identified the site's potential significant negative impact on two of the SA Objectives: 3. Protect and/or Enhance the Built Environment and 6. Conserve/Enhance Biodiversity and Landscape. In addition, the assessment highlighted the potential for a negative impact on the SA Objective 2. Adapt to Climate Change.</p> <p>The mitigation measures identified to address this harm included setting out detailed criteria and linking it to the preparation of a development brief. This SPD forms that development brief.</p>
<p>(e) the relevance of the plan or programme for the implementation of community legislation on the environment (for example, plans and programmes linked to waste management or water protection).</p>	<p>The draft SPD seeks to provide further details to Policy H2 of the Crawley Borough Local Plan. Both the Crawley Borough Local Plan and the draft SPD comply with the regulations.</p>
<p><b>2. Characteristics of the effects and of the areas likely to be affected</b></p>	
<p>(a) the probability, duration, frequency and reversibility of the effects.</p>	<p>The draft SPD supplements the policies in the Crawley Borough Local Plan in relation to an allocated Housing, Biodiversity and Heritage site and provides the context and framework for the preparation and determination of any planning applications associated with the allocation site.</p>

<p style="text-align: center;"><b>Criteria</b></p> <p><b>(Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004)</b></p>	<p style="text-align: center;"><b>Crawley Borough Council's Response</b></p>
<p>(b) the cumulative nature of the effects.</p>	<p>The draft SPD applies only to a single site, which is allocated in the Crawley Borough Local Plan for a maximum of 15 dwellings, along with enhancements to biodiversity and heritage assets within the site. Cumulative impacts have been considered as part of the wider Local Plan SA/SEA and the site's development is unlikely to result in significant environmental effects beyond those identified in the SA/SEA of the Crawley Borough Local Plan.</p>
<p>(c) the trans-boundary nature of the effects.</p>	<p>Whilst the site is located adjacent to the borough boundary, the draft SPD does not set development levels or allocate further land beyond that identified in the Crawley Borough Local Plan. It is not considered there will be significant environmental trans-boundary effects beyond those identified in the SA/SEA of the Crawley Borough Local Plan.</p>
<p>(d) the risks to human health or the environment (for example, due to accidents).</p>	<p>There are no perceived risks to human health or the environment arising from the draft SPD.</p> <p>The SPD seeks to minimise impact on human health by highlighting Local Plan Policy ENV11: Development and Noise, in relation to the site's location adjacent to the M23 motorway, and requiring a road safety audit to be provided as part of a planning application, in accordance with Policy CH3: Normal Requirements of All New Developments of the Crawley Borough Local Plan. These policies were subject to SA/SEA for the Crawley Borough Local Plan.</p>
<p>(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected).</p>	<p>The draft SPD applies to a single site, which is allocated in the Crawley Borough Local Plan for a maximum of 15 dwellings.</p>
<p>(f) the value and vulnerability of the area likely to be affected due to:</p> <p>(i) special natural characteristics or cultural heritage;</p> <p>(ii) exceeded environmental quality standards or limit values; or</p> <p>(iii) intensive land-use.</p>	<p>The site contains a variety of heritage and nature conservation assets or national, regional and local significance, including the following:</p> <ul style="list-style-type: none"> <li>• Forms part of the countryside setting of the Grade I Listed St. Nicholas' Church;</li> <li>• Located within the Worth Conservation Area;</li> <li>• Designated as a Site of Nature Conservation Importance (now known as Local Wildlife Sites);</li> </ul>

Criteria (Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004)	Crawley Borough Council's Response
	<ul style="list-style-type: none"> <li>• Contains an archaeologically sensitive asset;</li> <li>• Forms part of a Historic Park/Garden;</li> <li>• Located outside the Built-Up Area Boundary of the town, within the Tilate/Worth Forest Rural Fringe;</li> <li>• Crossed by the Balcombe Road Linear Contained View from Grayrigg Road and Balcombe Road towards the Grade I Listed Church;</li> <li>• Adjacent to the Gatwick Stream, and within Flood Risk Zones 2 and 3;</li> <li>• Moderate to high expected presence of legally protected species;</li> <li>• Adjacent to mature woodland surrounding the Grade I Listed Church and tree protected by Tree Preservation Orders.</li> </ul> <p>The SA/SEA assessment for the site's allocation in the Crawley Borough Local Plan identified the site's potential significant negative impact on two of the SA Objectives: 3. Protect and/or Enhance the Built Environment and 6. Conserve/Enhance Biodiversity and Landscape. In addition, the assessment highlighted the potential for a negative impact on the SA Objective 2. Adapt to Climate Change.</p> <p>The mitigation measures identified to address this harm included setting out detailed criteria and linking it to the preparation of a development brief. This SPD forms that development brief.</p>
(g) the effects on areas or landscapes which have a recognised national, Community or international protection status.	<p>The site is located within the Worth Conservation Area.</p> <p>The Crawley Borough Local Plan HRA examined how the policies and proposals within the Plan may impact on European sites, this indicated there is no likely significant effect on any European sites.</p>

- 3.2 On the basis of the above screening process, it is the council's opinion that the draft Development Brief SPD does not require an SEA under the SEA Directive and Environmental Assessment of Plans and Programmes Regulations (2004). This is because it supplements the Crawley Borough Local Plan Policy H2: Key Housing Sites and seeks to help mitigate the negative harm identified through the Local Plan SA/SEA process. It does not introduce development levels beyond that already assessed.
- 3.3 The council also has to consult the Environment Agency, Historic England and Natural England on this Screening Statement. A final determination cannot be made until the three statutory

consultation bodies have been consulted. This Statement will be sent to those consultation bodies for their comments.

#### 4. Sustainability Appraisal

- 4.1 Whilst there is no statutory reason to undertake a SA of SPDs, the council has considered whether a SA of this draft SPD is required. The council has determined that the draft SPD is unlikely to have significant environmental, social or economic effects beyond those of the policy it supplements (Policy H2 of the Crawley Borough Local Plan). In coming to this conclusion, the council is mindful that this draft SPD does not create new policies and serves only to expand on existing policy within its 'parent DPD', the Crawley Borough Local Plan 2015 – 2030 (which has already been subject to SA incorporating SEA).

#### 5. Habitats Regulations Assessment

- 5.1 In addition to SEA and SA, the council is also required to consider Habitats Regulations Assessment (HRA). HRA is the process used to determine whether a plan or project would have significant adverse effects upon the integrity of internationally designated sites of nature conservation importance, known as European sites. The need for a HRA is set out within the Conservation of Habitats and Species Regulations 2010 (which transposed EC Habitats Directive 92/43/EEC).
- 5.2 The Regulations state that the council must assess the potential effects of its land use plans against the conservation objectives of any sites designated for their nature conservation importance. A HRA<sup>6</sup> was carried out for the 'parent DPD', the Crawley Borough Local Plan.
- 5.3 Further assessment has subsequently been undertaken to consider whether development within the scope of the adopted Crawley Borough Local Plan continues to be considered acceptable, following the legal decision regarding in-combination assessments<sup>7</sup>. The conclusions of this further screening are set out in the paragraphs below.
- 5.4 Under the Conservation of Habitats and Species Regulations 2010 (the 'Habitats Regulations'), the competent authority – in this case, Crawley Borough Council – has a duty to satisfy itself that any plans or projects that they regulate (including plan making and determining planning applications) is not likely to have a significant effect on a European site of nature conservation importance. For developments in Crawley, there are three European sites within 15 kilometres of the borough's boundaries. These are the Ashdown Forest Special Protection Area (SPA), Ashdown Forest Special Area of Conservation (SAC) and Mole Gap to Reigate Escarpment Special Area of Conservation (SAC). Planning permission cannot be granted by the council where the likelihood of significant effects exists.
- 5.5 The main issues identified are recreational disturbance and atmospheric pollution, particularly arising from traffic emissions. This Development Brief SPD has been screened for its potential effects on the SPA and SACs. **This exercise has indicated there is no likely significant effect on the SPA or either of the SACs.**

##### Recreational Impacts

- 5.6 Screening has found that the recreational impacts of development on the SPA and SACs, in combination with all other planned development within Crawley and with other plans, is considered to be negligible, primarily due to their distance from the borough's boundaries and limited visitor numbers to these sites coming from Crawley.

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<sup>6</sup> Crawley Submission Local Plan Habitat Regulations Screening Report (2013) CBC [LP009 Crawley Submission Local Plan Habitat Regulations Screening Report](#) Crawley Borough Council (2013)

<sup>7</sup> Wealden District Council vs Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority, and Natural England. [2017] EWHC 351 (Admin) <http://www.bailii.org/ew/cases/EWHC/Admin/2017/351.html>



## Atmospheric Pollution

- 5.7 Increased traffic emissions as a consequence of new development may result in atmospheric pollution on Ashdown Forest. The main pollutant effects of interest are acid deposition and eutrophication by nitrogen deposition. High levels of nitrogen may detrimentally affect the composition of an ecosystem and lead to loss of species.
- 5.8 Screening has confirmed that the increased Annual Average Daily Traffic expected from the combined planned development levels within the Crawley Borough Local Plan, in combination with other plans or projects, is significantly below the potential for significance. The planned growth figure within Crawley borough was included in the background levels for the Mid Sussex Transport Study which indicates the development case for the Mid Sussex District Plan was not predicted to have an overall increase in traffic flows on roads through the Ashdown Forest<sup>8</sup>.
- 5.9 Crawley covers a small geographic area, and there are limited routes in and out of the borough, traffic is focused towards equally limited roads affecting the Ashdown Forest and sufficient modelled capacity in the Crawley Borough Local Plan Transport Strategy exists to cover the level of development anticipated by the site allocation subject to this Development Brief SPD.
- 5.10 On the basis of this evidence, there is not considered to be a significant in combination effect on the Ashdown Forest SAC created by this Development Brief SPD.
- 5.11 As the purpose of the draft SPD is to expand on the policies and allocation within the Crawley Borough Local Plan, and will not increase development beyond the levels already taken into account in the wider transport modelling, **the council has determined that a HRA for this SPD is not required.**

## **6. Conclusions**

- 6.1 On the basis of the screening process, **it is the council's opinion that the draft Land East of Balcombe Road/Street Hill, Worth Development Brief SPD does not require a Strategic Environmental Appraisal or a Sustainability Appraisal.**
- 6.2 This is because it supplements the Crawley Borough Local Plan Policy H2: Key Housing Sites and seeks to help mitigate the negative harm identified through the Local Plan SA/SEA process. It does not introduce development levels beyond that already assessed.

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<sup>8</sup> As set out within the Habitat Regulation Assessment for the Mid Sussex District Plan: Appropriate Assessment Report for the Main Modifications District Plan, paragraphs 5.4.14-5.4.15, 5.4.20, and 5.5.1 (2017) Urban Edge Environmental Consulting [Main Modifications - Habitats Regulations Assessment \(September 2017\) \(6MB PDF\)](#)

## APPENDIX 1: SUSTAINABILITY REPORT FOR THE LOCAL PLAN EXTRACT

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.

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.

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 (--)

**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	++	++	++	+	+?	+	++	+	+	+
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	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

<b>Key:</b>	
++	Significant positive impact on 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

## Appendix F: Submission Local Plan Policy Options and Appraisal (extract)

Policy H2: Key Housing Sites			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p><b>Option 3: Identify specific 'deliverable' and 'developable' housing sites to meet Crawley's housing requirements over the Plan period (2015-2030) and provide more detailed criteria for specific housing sites.</b></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.	1. To minimise climate change 2. To adapt to climate change 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. Provision of sufficient infrastructure to meet the requirements of the borough. 9. Healthy, active, cohesive and socially sustainable communities 10. Encourage active lifestyles	0 - - ? 0 - - - - 0	
<p><b>Commentary</b></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</p>			

	<p>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 related to the location of future housing development.</p>		
<p>Option 2: Identify specific 'deliverable' and 'developable' housing sites to meet Crawley's housing requirements over the Plan period (2015-2030).</p>	<p>1. To minimise climate change 2. To adapt to climate change 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. Provision of sufficient infrastructure to meet the requirements of the borough. 9. Healthy, active, cohesive and socially sustainable communities 10. Encourage active lifestyles</p>	<p>0 + + + 0 + + + + /</p>	
<p><b>Commentary</b></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>			
<p>Option 3: Identify specific 'deliverable' and 'developable' housing sites to meet Crawley's housing requirements over the Plan period (2015-2030) and provide more detailed criteria for specific housing sites</p>	<p>1. To minimise climate change 2. To adapt to climate change 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. Provision of sufficient infrastructure to meet the requirements of the borough. 9. Healthy, active, cohesive and socially sustainable communities 10. Encourage active lifestyles</p>	<p>0 + + + 0 + + + ++ /</p>	<p>Mitigation not required as no negative impacts identified.</p> <p>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 requirements for provision of access to good quality outdoor sport and play space.</p> <p>Impacts on heritage and biodiversity must be mitigated against through strong design and management criteria. Needs of older people can be helped to be met through the specific allocation of a housing site for older people's accommodation.</p>
<p><b>Commentary</b></p> <p>By providing more detail within the Policy in relation to some of the sites which have particular constraints or opportunities, 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</p>			

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.

SA objectives 1 and 5 were ruled out on the basis that they are not specifically related to the location of future housing development.

Development sites identified for allocation include some existing open space sites. However, as 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. One of the allocation sites is likely to have some negative impact on the site specific nature conservation and heritage assets. Mitigation against this will be achieved by including detailed criteria and linking it to the preparation of a development brief.

Evidence has indicated a need for provision of specialist housing to meet the needs of older people. One site can be allocated for this purpose and helps support the principle of ensuring some offer is provided within the borough over the Plan period.

### **Submission Local Plan Site Allocations and Designations Appraisal**

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.

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).

## Assessment of Allocated Housing Sites (Policy H2)

**Site Name:** Land East of Street Hill

**Site Potential Allocation:** Housing, Biodiversity and Heritage Site

**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	<b>Unknown Impact (?)</b>
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. <b>Negative Impact (-)</b>
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. <b>Significant Negative Impact (--)</b>
4. Decent/Affordable Homes	Taking into account the extent of environmental and heritage assets associated with the site, capacity is constrained. Therefore, this site could offer a limited 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. <b>Positive Impact (+)</b>
5. Maintain/Support Employment	Whilst the site would only be limited in housing numbers, the provision of new housing is closely linked to supporting economic growth. <b>Positive Impact (+)</b>
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. <b>Significant Negative Impact (--)</b>
7. Promote Sustainable Journeys	The site is located close to the urban area. <b>Unknown Impact (?)</b>

<b>SA Objective</b>	<b>Commentary and/or Impact</b>
8. Provide Sufficient Infrastructure	The site is located adjacent to the existing residential area which are served by existing infrastructure services. <b>Uncertain Impact (?)</b>
9. Promote Sustainable Communities	<b>Unknown Impact (?)</b>
10. Encourage Active Lifestyles	<b>Unknown Impact (?)</b>
<b>Conclusions</b>	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 is essential that appropriate mitigation measures are in place and secured to limit the negative impacts of development, particularly in terms of maintaining the rural character of the conservation area and vicinity of the Listed Church outside the built up area boundary and in relation to the biodiversity of the SNCI and heritage assets including the historic park and garden and the archaeologically sensitive moat.