

Crawley Borough Council

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

**Sustainability Report for the Hazelwick Road
Conservation Area Statement**

JUNE 2019



1. Introduction

- 1.1 This statement sets out Crawley Borough Council's (the council) 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 Hazelwick Road Conservation Area Statement 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 Plan¹ was accompanied by a full Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA), which was prepared iteratively alongside the Plan at each stage².
- 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 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 Regulation 9(3) statement.**

2. Background to the Conservation Area Statement

- 2.1 The Hazelwick Road Conservation Area Statement (SPD) has been prepared to support the protection and enhancement of a designated Conservation Area, supported by Policy CH13: Conservation Areas of the Crawley Borough Local Plan. The Hazelwick Road Conservation Area Statement SPD provides an understanding of the significance of the Conservation Area by identifying and analysing its principal characteristics. The SPD will not in itself set levels 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 appraisals³. In addition, the allocation site was subject to detailed SA/SEA assessment⁴. These are extracted and set out in Appendix 1 to this Screening Report.

3. The Strategic Environmental Appraisal Process

- 3.1 The first stage of the process is for the council to determine whether or not the 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.

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

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

³ 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

⁴ 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

TABLE 1: SEA Screening for the Hazelwick Road Conservation Area Statement SPD

<p style="text-align: center;">Criteria</p> <p style="text-align: center;">(Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004)</p>	<p style="text-align: center;">Crawley Borough Council's Response</p>
<p>1. Characteristic of the plan or programme</p>	
<p>(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.</p>	<p>The Conservation Area Statement 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 Policies CH11, CH12, CH13. The purpose of the SPD is to set a framework for the policies' implementation and mitigate against any harm from development within the Conservation Area and making sure that the historic significance of the Area is conserved.</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 SPD provides more details in relation to the character and context of the Conservation Area designation, and sets out the framework for any new development proposed within, or affecting, the Area.</p>
<p>(d) environmental problems relevant to the plan or programme.</p>	<p>The document itself does not have any significant environmental problems. The SPD seeks to guide development within the designated Conservation Area in order to allow for better management of development within the Area and remove, reduce and mitigate any potential harm from development.</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 SPD seeks to provide further details to the heritage policies in the Crawley Borough Local Plan. Both the Crawley Borough Local Plan and the SPD comply with the regulations.</p>
<p>2. Characteristics of the effects and of the areas likely to be affected</p>	
<p>(a) the probability, duration, frequency and reversibility of the effects.</p>	<p>The SPD supplements the heritage policies in the Crawley Borough Local Plan in relation to a</p>

<p style="text-align: center;">Criteria</p> <p style="text-align: center;">(Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004)</p>	<p style="text-align: center;">Crawley Borough Council's Response</p>
	<p>Conservation Area and provides the context and framework for the preparation and determination of any planning applications within the designated Area. The aim of the Conservation Area Statement SPD is to identify the historically important features of the Area with a view to ensuring their conservation and enhancement in line with Policy CH13. Therefore, any sustainability effects of this SPD are likely to be positive, in line with the findings of the SA/SEA of Policy CH13.</p>
<p>(b) the cumulative nature of the effects.</p>	<p>Cumulative impacts have been considered as part of the wider Local Plan SA/SEA and the SPD 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>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 SPD.</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 SPD applies to a designated Conservation Area.</p>
<p>(f) the value and vulnerability of the area likely to be affected due to:</p> <ul style="list-style-type: none"> (i) special natural characteristics or cultural heritage; (ii) exceeded environmental quality standards or limit values; or (iii) intensive land-use. 	<p>The SPD applies to Hazelwick Road Conservation Area. This contains no Listed Buildings; one Locally Listed Building, and no archaeologically sensitive assets.</p> <p>The SPD seeks to guide development within the designated Conservation Area to ensure that it preserves and/or enhances its special architectural and historic character, and removes, reduces and/or mitigates any potential harm from development.</p>
<p>(g) the effects on areas or landscapes which have a recognised national, Community or international protection status.</p>	<p>The SPD applies to the Hazelwick Road Conservation Area. The SPD aims to conserve and enhance the historic landscape including protection of historic views.</p> <p>The Crawley Borough Local Plan HRA examined how the policies and proposals within the Plan may</p>

Criteria (Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004)	Crawley Borough Council's Response
	impact on European sites, this indicated there is no likely significant effect on any European sites.

- 3.2 On the basis of the above screening process, it is the council's opinion that the Hazelwick Road Conservation Area Statement SPD does not require an SEA under the SEA Directive and Environmental Assessment of Plans and Programmes Regulations (2004). This is because there will be no significant environmental effects arising from its implementation and that it supplements the Crawley Borough Local Plan Policy CH13: Conservation Areas.
- 3.3 The council has consulted the Environment Agency, Historic England and Natural England on this Screening Statement. Natural England and Historic England agree with the council's view that an SEA is not required. The Environment Agency advises that it no longer comments on screening opinions relating to SPDs.

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 SPD is required. The council has determined that the SPD is unlikely to have significant environmental, social or economic effects beyond those of the policy it supplements (Policy CH13 of the Crawley Borough Local Plan). In coming to this conclusion, the council is mindful that this 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).
- 4.2 Feedback from Natural England and Historic England agree with the council's view that SA of this SPD is not required. The Environment Agency advises that it no longer comments on screening opinions relating to SPDs.

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 HRA⁵ 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 assessments⁶. 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

⁵ Crawley Submission Local Plan Habitat Regulations Screening Report (2013) CBC [LP009 Crawley Submission Local Plan Habitat Regulations Screening Report](#) Crawley Borough Council (2013)

⁶ 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>

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).

- 5.5 The main issues identified are recreational disturbance and atmospheric pollution, particularly arising from traffic emissions. This Conservation Area Statement 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. This Conservation Area Statement in itself does not promote new development.

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 Forest⁷.
- 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 Crawley Borough Local Plan. This Conservation Area Statement in itself does not promote new development.
- 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 Conservation Area Statement SPD.
- 5.11 As the purpose of the SPD is to expand on the policies and seek to protect and enhance the heritage designation within the Crawley Borough Local Plan, and it 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.** This position is accepted by Historic England and Natural England, with the Environment Agency confirming that it will not be commenting on this matter.

6. Conclusions

- 6.1 On the basis of the screening process, **it is the council's opinion that the Hazelwick Road Conservation Area SPD does not require a Strategic Environmental Appraisal or a Sustainability Appraisal.**

⁷ 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 \(September 2017\) \(6MB PDF\)](#)

- 6.2 This is because there will be no significant environmental, social or economic effects arising from its implementation and that it supplements Policies CH12, CH13 and CH16 of the Crawley Borough Local Plan⁸.
- 6.3 As discussed, the council's position is accepted by Historic England and Natural England, with the Environment Agency confirming that it will not be providing comments.

⁸ Please see Crawley Borough Local Plan Sustainability Appraisal/Strategic Environmental Assessment pages 66-68 Topic Area B: Heritage, Character, Design and Architecture Baseline Information, Trends, Plans, Policies and Programmes; and pages 129-134 for relevant Local Plan policy options and appraisals (December 2015). CBC: <http://www.crawley.gov.uk/pw/web/PUB271703>

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	++	++	++
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 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 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.	<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>	
	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.	<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>	Mitigation not required as no negative impacts identified.
	<p>Commentary</p> <p>A policy relating to Conservation Areas will effectively protect/enhance the built environment in a manor 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.</p>		

