

SUSTAINABILITY APPRAISAL / STRATEGIC ENVIRONMENTAL ASSESSMENT

REPORT

For the Crawley Borough Local Plan Modifications Consultation

February 2024

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NON-TECHNICAL SUMMARY

1. Crawley Borough Council ('the council') is reviewing its Local Plan (the adopted Crawley Borough Local Plan: Crawley 2030, December 2015). As the Local Plan Review is a focused update and refresh of an adopted Local Plan, the strategic approach and many of the policies are intended to be retained from the currently adopted Local Plan. However, the Local Plan Review considers changes to the National Planning Policy Framework as published in 2021¹ and updated local evidence. The new Local Plan remains to be a single document, which sets out the policies to guide both strategic development and development management over the period 2023 – 2040. A key aim of the Local Plan is to ensure that the borough continues to develop sustainably.
2. Local Planning Authorities are required to carry out a Sustainability Appraisal (SA) 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 Local 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 place.
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 the Local Plan. This process involves the assessment and mitigation of negative environmental impacts of specific plans and programmes.
4. The SA/SEA processes consider the impacts of proposed development options on people's health and covers the criteria of a Health Impact Assessment (HIA). The SA/SEA also considers the potential effects of the Plan on people in respect of disability, gender and racial equality impacts, in accordance with the requirements of the Equalities Act 2010 for an Equalities Impact Assessment (EIA).
5. For the purposes of the Local Plan Review, the SA, SEA, HIA and EIA have been incorporated into this Sustainability Report, which, for ease, is referred to as the SA//SEA.

Baseline Data

6. In order to carry out the SA/SEA of the Local Plan, information was collected and analysed to establish what the town is like currently. This is known as 'baseline data'. This information helps to build a picture of the successes and challenges facing the town to understand the 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, representing the geographic and economic heart of the Gatwick Diamond and wider Coast to Capital Local Enterprise Partnership area. The town's economy is generally strong with total employment in the town being around 85,000 jobs and, although the COVID-19 pandemic impacted significantly on the borough's aviation-led economy, Crawley is recovering well economically. With the economy forecast to consolidate and grow over the Plan period to 2040, new business land and floorspace is identified. There is significant in-commuting to the town, and on average people who travel into Crawley for work earn more than people who live within

¹ National Planning Policy Framework (2021) MHCLG <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

the borough. Many residents are employed in lower-paid industries, and addressing the local skills gap to increase opportunities for Crawley residents is a priority.

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 is significantly higher than supply. Generally, the borough has low levels of deprivation, although there are several pockets of deprivation in the west of the borough. Although perception of crime within the borough is high, actual crime has reduced in recent years. Education levels are low when compared to the majority of West Sussex districts, although the percentage of residents with no qualifications has lowered in recent years.

Environment

Overall, the borough has a high quality built and natural environment. A National Landscape: the High Weald, extends into the borough to the south. A site has been designated as a Local Green Space site: Ifield Brook Meadows/Ifield Playing Fields, due to its high recreation, landscape, tranquillity, wildlife, heritage and accessible countryside value. There are six Local Nature Reserves; 12 Local Wildlife Sites; 13 Conservation Areas; 104 Listed Buildings; nine areas designated as Areas of Special Local Character; and six areas designated as a Historic Park or Garden. However, there are threats to the environment as a result of pollution associated with Gatwick Airport, the busy transport interchanges and main employment areas, and development pressures.

Sustainability Issues and Sustainability Objectives

7. The baseline information helped to inform the identification of the key sustainability issues affecting the borough. These subsequently led to the development of a set of Sustainability Objectives, to enable assessment of the Local Plan, and its associated policies, allocations and designations against. The sustainability issues are set out as follows under each of the Sustainability Objectives:

Crawley's Sustainability Issues:	
1. To mitigate climate change, by taking actions to reduce the concentration of greenhouse gases in the atmosphere.	
Climate Change	Crawley as a dense urban area has a high level of carbon emissions and anticipated development, which will contribute towards the causes of climate change. In addition, it is also identified as an area of radiant energy and subject to serious water stress. Therefore, its adaptation towards climate change will provide opportunities to harness and threats to be addressed.
Energy Supply	Crawley remains an energy- and carbon-intensive economy, with a high level of commercial and transport emissions, a legacy of post-war building stock, and a continuing reliance on gas as a domestic heat source, although emissions are declining and deployment of renewable and low/zero carbon energy infrastructure – notably solar PV and heat networks – is gaining momentum.
Waste	Crawley falls within the West Sussex strategy for managing waste. This promotes sustainable waste management. Crawley Borough Council is responsible for household waste and recycling collection. Commercial waste is collected by the private sector and disposal facilities come under WSCC. The majority of Crawley's household waste goes to the Mechanical Biological Treatment (MBT) facility at Brookhurst Wood. Only a very small amount, mainly dog

Crawley's Sustainability Issues:	
	<p>faeces, continues to go to landfill, located at Redhill. The former Brookhurst Wood landfill is now closed.</p> <p>Reducing overall waste production and increasing the amount recycled, reused or composted will remain a key issue and this will be even more prevalent with the increase in the borough's population in the future. This is likely to put pressure on existing waste management services.</p>
Pollution	Crawley's role as an economic hub and transport interchange means the town's contribution to air, land, water and noise pollution is likely to increase.
Air Quality	In the context of an expanding town and international airport, maintenance of air quality may become increasingly problematic. It is important that opportunities are taken to improve local air quality conditions, and as a minimum, mitigate the impacts of the development through good design and sustainable building measures that promote good air quality.
Noise	Noise from a range of sources has the potential to affect people living, working in and visiting Crawley, particularly aircraft noise in the north of the borough. Due to the urban nature of Crawley noise sources and exposure vary. There are relatively tranquil areas, such as within Crawley's large parks, ranging to much noisier areas close to the M23, Main Employment Areas, and land close to Gatwick Airport. The degree to which this will affect people could be influenced by the proximity of development to noise sources or receptors, and also the future level of growth of Gatwick Airport.
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.	
Flooding	Crawley borough falls entirely within the upper reaches of the River Mole catchment, with areas at risk of flooding from fluvial sources. River flooding is not the only source of flood risk; Crawley is at the highest risk of surface water flooding in West Sussex, whilst flood risk from groundwater and sewer sources must also be considered. Development must be planned sustainably with flood risk from all sources in mind to ensure the well-being of its future users over the lifetime of development, whilst ensuring that it does not increase flood risk elsewhere.
Water Supply	The potential for development to be concentrated in the Crawley area may lead to water supply issues, particularly given current levels of serious water stress. The Southern Water Sussex North Water Resource Zone is supplied from a groundwater abstraction in the Arun Valley and it has not been demonstrated, with certainty, that the abstraction is not having an adverse effect on the integrity of Internationally Designated Habitat sites. One way of preventing any further negative impact is to ensure that all new development is water neutral. Water neutrality is defined as 'development which does not increase the rate of water abstraction for drinking water supplies above existing levels'.
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.	
Quality of Life	There is a need to enhance quality of life to ensure Crawley remains a place where people want to live.
Land Supply	The borough is characterised as a town within a countryside setting. The borough's administrative boundaries run close to the Built-Up Area Boundary in most cases, with Gatwick Airport located within the borough's boundaries to the north. Due to these factors, and the requirement to safeguard land for a possible southern runway at Gatwick Airport, land supply in the borough is severely limited, meaning the borough's abilities to meet its own needs (economic and housing development, infrastructure, and other open space and recreation land requirements) is highly constrained.

Crawley's Sustainability Issues:	
Heritage	Crawley's heritage comprises the accumulated physical remains of earlier human settlement and activity in the locality. Crawley's heritage assets include more obvious landmarks such as churches, the High Street, and older village cores, as well as older archaeological remains and modern development from the borough's 'New Town' era. Conservation and enhancement of these assets can improve wellbeing by providing a tangible link to a longer historical story.
4. To ensure that everyone has the opportunity to live in a decent and affordable home.	
Housing Delivery	Local housing delivery is sensitive to the national economic climate.
Housing Stock	The housing stock does not match the need and aspirations of the borough in terms of house type and sizes. The age of much of the existing housing stock means it is unable to meet needs of the borough to manage climate change emissions. The fabric of buildings requires retrofitting in order to secure energy efficiency benefits.
Affordable Housing	Affordable housing provision does not match the significant level of need.
5. To maintain, support and promote a diverse employment base that can serve the local and sub-regional and regional economy.	
Investment Attractiveness	There is a need to ensure Crawley remains a place where businesses and people want to invest, in order to support sustainable economic growth.
Economic Land Supply and Building Stock	The constrained land supply means there is insufficient land available to meet the development needs of the business and industrial uses. There is a mismatch between the quality of the existing building stock and the current needs of the changing economy, both within the dedicated business areas and within the town centre. A lack of a business hub in Manor Royal leaves a gap in the needs of the businesses located in this area.
Social Mobility and Skills Gap	There is a recognised disparity between the, on average, lower level of qualifications and income achieved by people that live in Crawley and those of the in-commuting workforce, which are on average higher. Therefore, Crawley residents are less likely to access higher-skilled, higher paid jobs. This is reflected in Crawley's position close to the bottom of social mobility rankings published in the State of Nation report, where Crawley ranks 304th out of 324 local authorities. Significant forecast job growth in Crawley presents the opportunity to maximise skills development and employment opportunities for local people.
Changing Economy	The economic structure of the town is dominated by large scale airport related business, supported by a broader range of sectors including storage & distribution, research and design, and professional services. The recent economic implications arising from COVID-19 have shown Crawley's economy to be very reliant on the aviation sector, and as identified by the Economic Recovery Plan (2021) there is need to support continued economic recovery and diversification.
Retail Competitiveness	The retail sector of the town's economy has faced challenges in recent years, particularly as a result of competition from online and out-of-centre retailers, and with shopping habits further evolving as a result of the COVID-19 pandemic. Improvements to the quality and diversity of the town centre has already been taking place in response to this.
Growth of Gatwick Airport	Prior to the COVID-19 pandemic, passenger numbers at Gatwick Airport had been continuously increasing (now returning close to their pre-pandemic peak), which has a positive impact on the local economy, supporting jobs on-airport and also indirectly in the local area, encouraging businesses to locate and invest in Crawley.

Crawley's Sustainability Issues:	
	There is a need to support the continued economic recovery of aviation related sectors, whilst also supporting the diversifying of Crawley's economy so that it is more responsive to change.
Town Centre Neighbourhood	<p>An increasing residential population has seen the town centre becoming a neighbourhood in its own right, increasing the need for supporting facilities to serve the residential population. There is a need to balance the commercial function of the town centre with its role as a place to live. Potential conflicts may occur between amenity-sensitive residential use and the need to support a vibrant night-time and evening economy.</p> <p>A predominance of smaller dwellings and housing mix within the town centre pose challenges to ensure balanced community.</p>
6. To conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough and minimise harm to those outside Crawley's administrative boundaries from activity within the borough.	
Green Infrastructure	<p>The lack of development land is increasing the threat to nature areas, open spaces and green infrastructure within the urban environment.</p> <p>Connectivity of green corridors can be limited due to the urban nature and built form of the borough.</p>
Biodiversity	<p>Development in the borough will impact on biodiversity, fauna, flora and soil. In order to address the historic overall loss of biodiversity within the borough, opportunities should be taken for ensuring 'Net Gain' and delivery of the Pollination agenda.</p> <p>Parts of Crawley are supplied water from a groundwater abstraction which cannot, with certainty, conclude no adverse effect on the integrity of Internationally Designated Habitat sites.</p>
7. To reduce car journeys and promote sustainable and alternative methods of transport, whilst ensuring sufficient transport infrastructure is delivered to meet the requirements of the borough.	
Transport Demand	<p>The growth of the town will increase pressures on transport infrastructure that is already approaching capacity. Bus use in Crawley is high, but further improvements to public transport and active travel modes are needed to encourage modal shift towards sustainable transport options. Major new developments can also be planned and designed in a way that both encourages and enables increased transport modal share. Airport-related parking must be sustainably located within the Gatwick Airport boundary. Parking provision requirements can influence car ownership.</p>
8. To ensure the provision of sufficient infrastructure to meet the requirements of the borough.	
Infrastructure provision	The rate of development, particularly residential and also airport growth, requires careful management to ensure that it does not outstrip the borough's infrastructure.
Sewerage	The potential for development to be concentrated in Crawley may lead to sewerage capacity problems.
Community Facilities	<p>The changing population demographics are creating a mismatch between the need for housing and community facilities and current provision.</p> <p>Over-demand on leisure facilities means these are nearing capacity.</p>
9. To promote healthy, active, cohesive and socially sustainable communities. To ensure all benefit from a good quality of life. To ensure everyone has the opportunity to participate in sport and to encourage active lifestyles.	
Ethnic Diversity	The population of Crawley is notably diverse in comparison to the national average resulting in specific development demands.

Crawley's Sustainability Issues:	
Young Population	Crawley has a high proportion of young children compared with other West Sussex local authorities. The educational attainment of children qualifying for free school meals in Crawley is notably below average.
Ageing Population	Due to its New Town history, Crawley has an increasingly ageing population which is increasing pressures on services and the built environment at the same time.
Street Community and Homeless	There is a small but significant population who are spending nights on the streets, primarily within Crawley town centre.
Arts & Culture	Crawley's population has a low participation rate in arts and cultural activities. Low levels of cultural economic opportunities or businesses.
Crime	There is a need to reduce crime and the perception of crime.
Health	Physical activity in the borough is below average.
Health Care	Provision of health facilities and services is at or over capacity in most parts of the borough, e.g. GP provision.
Open Space, Sport and Recreation	Increasing demand on parks, sports facilities and open spaces means these are nearing capacity. The lack of development land is increasing the threat to open spaces and sport and recreation facilities within the urban environment.

Spatial Strategy and Reasonable Alternatives

8. As part of the Local Plan Review, two initial assessments were undertaken to consider the scope of the Local Plan and the spatial approach to the future planning for development:
1. Local Plan Options
 2. Spatial Strategy Options

These assessments concluded the most appropriate approach to take in the Updating of the Local Plan would be a whole Plan Review, based on a policy-by-policy assessment, with a restructured document to align with the council's Corporate Priorities. It would continue the adopted Local Plan spatial strategy as a Crawley-focused Plan set within a Sub-Regional context.

Identification and Assessment of Policies and Options

9. In order to ensure that the Local Plan addresses the sustainability issues identified within this Sustainability Report, each planning policy contained within the Local Plan was assessed 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 it would be more sustainable to have a policy than not to have a policy, since the former would lead to uncontrolled development, which could harmfully impact the economy, the environment and create or worsen social problems.
10. In addition, it was determined that in some cases the chosen option would not represent the most sustainable approach but was selected since more sustainable alternative options would not necessarily comply – with national planning legislation, or where selection of that option might result in development viability or deliverability concerns. Therefore, the submission Local Plan policies chosen are believed to be the most sustainable having assessed reasonable and realistic alternatives.

11. 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

12. The main findings from this Sustainability Appraisal are as follows:

- The assessment of the Local Plan policies generally found that the 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 in the borough.
- The policies protecting the character, design, heritage and environment of the borough work harmoniously to protect both the built and natural environment of the borough and its setting. These policies also have a positive effect on ensuring healthy, active cohesive and socially sustainable communities and encouraging active lifestyles. However, the combined effect of these policies limits the overall amount of land which is available for development. In order to alleviate these necessary limiting factors, additional policies exist which aim to encourage the effective use of land, more compact new development and minimum density ranges in areas where appropriate.
- Key housing and employment sites and main employment areas have been identified within the Local Plan to meet as much of the development needs of 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. For example, levels of crime or decisions of private companies to locate within the town are only partly based on planning policies within the Local Plan.
- The majority of the policies have combined to have an overall positive impact for the economy.

13. Once the individual and joint impacts of policies within the Local Plan had been assessed, the most significant impacts were identified. In general, the most significant negative effects relate to the impact on countryside setting and environmental designations, increased infrastructure need and the effects of traffic, including those arising as a consequence of Gatwick Airport.

14. Beneficial impacts include an increase in the number of affordable homes, new employment floorspace, and the maintenance and improvement of the character of Crawley, which retains its defining neighbourhood principle approach.

Mitigation of Policies with Negative Impacts

15. To minimise any negative effects of the chosen Local Plan policies, a number of mitigation measures have been identified and incorporated (see Appendix G for full details). The main mitigation measures are as follows:
- Other policies within the Local Plan, when considered as a whole, have the potential to counteract negative impacts of specific policies on a particular Sustainability Objective.
 - 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 will be mitigated against within other Local Plan policy documents, such as Supplementary Planning Documents.
 - In particular, environmental impacts can be mitigated against at the planning application stage, either through in-depth ecological reports and/or an Environmental Impact Assessment (EIA). Planning conditions will also play a role in ensuring that 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 documents that form the Local Plan are being implemented. The findings of this ongoing monitoring reporting process will assist the council in measuring how well the Local Plan contributes towards sustainable development, and will also inform future reviews of the vision, strategy 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 must carry out Sustainability Appraisal (SA) of the Local Plan to satisfy independent examination and allow the Plan to be formally adopted. Retained EU law also requires that Strategic Environmental Assessment (SEA) is carried out to ensure that the environmental effects of the Plan are taken into account. The SA/SEA is an ongoing process, which attempts to identify the social, environmental and economic impacts of planning policies and allocations.
- 1.2 The SA/SEA process considers the impacts of proposed development options on people's health and covers the criteria of Health Impact Assessment. The Local Plan seeks to promote opportunities for all people in Crawley. The SA/SEA will also consider the potential effects of the Plan on people in respect of disability, gender and racial equality impacts, in light of the Equalities Act 2010.
- 1.3 This draft report outlines the sustainability issues and objectives for Crawley, which have been under consideration in reviewing the adopted Crawley Borough Local Plan². The Review has taken into account the revised National Planning Policy Framework 2021, technical evidence and consultation feedback, and, following its examination and adoption, will result in a revised Local Plan for Crawley for the period 2023-2040.
- 1.4 The SA/SEA follows an iterative process, providing a view of the likely implications for sustainable development of different options for policy identified during the review of the Local Plan. The findings of the earlier scoping work and previous draft reports (consulted upon between July and September 2019; between January and March 2020; and between January and June 2021) were taken into consideration whilst finalising the Crawley Local Plan for Full Council approval for Publication and Submission. It has been reviewed in light of the proposed Main and additional Modifications agreed through the Examination process and is published alongside the Modifications Consultation for comment.
- 1.5 This SA/SEA takes into account the evidence undertaken since the approval of the Local Plan considered by Full Council in December 2020 and the feedback from the consultation undertaken between January and June 2021. It concludes that the Local Plan remains legally compliant and sound when re-assessed against the SA/SEA.

Structure of the Scoping Report

- 1.6 This draft SA/SEA report is structured as follows:
 - Section 2 gives a summary of the report, the methodology proposed for Sustainability Appraisal of the Local Plan, and the Plan area.
 - Section 3 provides an introduction to the SA process and explains how the SEA requirements have been incorporated. The Local Plan/SA production timetable is outlined. Representations made to previous public consultations on earlier versions of the SA/SEA are set out in Appendices B, C and D.
 - Section 4 describes social (including health), environmental and economic issues of significance in Crawley; baseline data and relevant plans, policies and programmes. The Section sets out a summary of key issues identified and list of Sustainability Objectives and identifies a monitoring framework. This is supported by the topic area baseline data set out in Appendix E, which details the Plans, Policies and Programmes.

² [Crawley 2030: Crawley Borough Local Plan 2015 – 2030](#)

- Sections 5, 6 and 7 provide detail of the SA/SEA process undertaken including the Appraisal of Local Plan spatial strategy, water neutrality requirement and policy options and assessing the reasonable alternatives. This is supported by the detailed appraisals set out in Appendices F, G and H.

Consultation Arrangements

- 1.7 Consultation on this updated version of the Report forms part of the SA/SEA/HRA-focused Modifications Consultation of the Local Plan Review. Feedback from the consultations will be used to inform the examination of the Local Plan, Sustainability Appraisal, and Habitats Regulations Assessment (HRA).
- 1.8 The document will be available for a six-week public consultation period commencing 12 February 2024. We welcome any comments in relation to changes to this Report related to the Main Modifications. Should you wish to comment on the document, please do so on or before **5pm on 25 March 2024**.
- 1.9 There are two ways in which representations can be submitted:
 - Electronically by email to strategic.planning@ Crawley.gov.uk
 - By post to Strategic Planning, Crawley Borough Council, Town Hall, The Boulevard, Crawley, West Sussex, RH10 1UZ.
- 1.10 For further information about the Sustainability Appraisal and Strategic Environmental Assessment, please contact Elizabeth Brigden on (01293) 438624 or e-mail strategic.planning@ Crawley.gov.uk
- 1.11 The Sustainability Appraisal/Strategic Environmental Assessment can be viewed in hard copy at:
 - Crawley Town Hall
 - Crawley Library

It can also be accessed electronically on the council's website at:

<https://Crawley.gov.uk/planning/planning-policy/local-plan/local-plan-review>

2.0 CONTEXT AND METHODOLOGY

Introduction to Sustainable Development

- 2.1 The most widely used definition for sustainability 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 is to enable everyone to satisfy their basic needs and enjoy a better quality of life, without compromising the quality of life of future generations. It is about considering long-term social, economic and environmental issues and impacts in an integrated and balanced way.

Strategic Environmental Assessment and Sustainability Appraisal

- 2.3 Section 39 of the Planning and Compulsory Purchase Act 2004, requires Local Development Documents (LDD) 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.
- 2.4 The aim of the SA is to ensure that the Local Plan is as sustainable as possible. The process involves examining the likely effects of the plan and considering how they contribute to environmental, social and economic wellbeing. Where problems are identified mitigation measures can be proposed and put in place. Therefore, these processes can improve the overall sustainability of the plan being prepared.
- 2.5 As the SA and SEA processes are so similar, they have been undertaken together and for ease of reference, this document will refer to both processes as a SA. However, government guidance suggests that the SA should identify where the requirements of SEA have been met. Table 2.1 sets out where the requirements of the SEA Directive have been met in this report.

Table 2.1 SA/SEA Report and conformity with SEA Directives

SEA Directive Requirements	Location within Report
Annex 1 A Outline of report contents Main objectives of the plan & relationship with other plans and programmes.	Section 1, Section 2, Section 3 and Appendix E
Annex 1 B Current state of the environment & likely evolution thereof without implementation of the plan.	Section 4 and Appendix E
Annex 1 C Environmental characteristics of areas likely to be significantly affected.	Sections 3 and 4, Appendix E, F, G and H

SEA Directive Requirements	Location within Report
<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>	Section 4, 5 and 6 and Appendix E
<p>Annex 1 E Environmental protection objectives, established at international, community or national level and the way those objectives and any environmental considerations have been taken into account during its preparation.</p>	Section 4, 5 and 6 and Appendix E
<p>Annex 1 F 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, 5, 6 and 7, Appendix E, F, G and H
<p>Annex 1 G The measures envisaged to prevent, reduce and as fully as possible, offset any significant adverse effects on the environmental impacts of implementing the plan.</p>	Section 4, 5, 6 and 7, Appendix E, F, G and H
<p>Annex 1 H 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, 6 and 7, Appendix E, F and G
<p>Annex 1 I A description of the measures envisaged concerning monitoring.</p>	Section 4, 5, 6 and 7, Appendix E, F, G and H
<p>Annex 1 J A non-technical summary of the information provided within the SA/SEA report.</p>	Non-Technical Summary

Habitats Regulations Assessments (HRA)

2.6 The Conservation of Habitats and Species Regulations 2017 require an Appropriate Assessment (known as Habitats Regulations Assessment (HRA) in the UK) to be undertaken. HRA assesses the impact of land-use plans against the conservation objectives of European Sites within certain distances of the borough (15km has been used in the case of Crawley). The HRA ascertains whether the Local Plan's proposals would adversely affect the integrity of a site on its own, or in combination with the plans of neighbouring authorities.

- 2.7 In tandem with the previous SA/SEA Report, the council prepared an initial draft HRA Screening Report (July 2019 and January 2020). The findings of the Screening Report suggested that there is no significant likelihood of adverse impacts on protected sites from the implementation of the plan. No comments were received on the HRA Screening Report, during the formal consultation periods held in July-September 2019 or January-March 2020, to suggest the conclusions of the Report were incorrect or fundamentally flawed.
- 2.8 A draft HRA Report (January 2021) was prepared to support the consultation on the Local Plan between January and June 2021. This highlighted additional work was needed in relation to air quality and water supply.
- 2.9 An updated HRA Report was published alongside the Submission SA/SEA (January 2023). A screening assessment was undertaken which identified a number of Likely Significant Effects (LSEs) associated with the Local Plan. Taking no account of mitigation measures these had the potential to affect the following Habitats sites:
- Ashdown Forest SAC and SPA – air quality LSEs in-combination;
 - Mole Gap to Reigate Escarpment SAC – air quality LSEs in combination;
 - Mole Gap to Reigate Escarpment SAC – hydrology LSEs alone;
 - Arun Valley SAC – hydrology LSEs alone;
 - Arun Valley SPA – hydrology LSEs alone;
 - Arun Valley Ramsar – hydrology LSEs alone; and
 - The Mens SAC – habitat loss and fragmentation (at functionally linked land due to knock on hydrological LSEs) LSEs alone.
- 2.10 The HRA progressed to an Appropriate Assessment which looked at the impacts of a change in air quality, water quality and quantity and impacts upon functionally linked land upon the qualifying features and conservation objectives of each Habitats site.
- 2.11 The Appropriate Assessment took into consideration the outputs of detailed air quality modelling and water quality modelling to inform the conclusions of the Appropriate Assessment. Planning policy has also been informed by a large piece of work that was commissioned by the council and other affected LPAs within the Sussex North WRZ to ensure all Local Plans (both alone and in-combination) would achieve nutrient neutrality. Required mitigation is secured through policies within the Local Plan itself and through the wider protective environmental protection framework.
- 2.12 On the basis of the Appropriate Assessment, the HRA concluded that the Local Plan would have no adverse impact on site integrity (AIOSI) at any Habitats site, either alone or in-combination.
- 2.13 The HRA has been reviewed against the proposed Modifications subject to this current stage of public consultation, and has confirmed its previous conclusions.

Methodology

- 2.14 As this Local Plan Review is an update of an adopted Local Plan, the strategic approach and many of the policies are intended to be retained from the currently adopted Local Plan. A Sustainability Appraisal/Strategic Environmental Assessment was carried out previously, which evolved for every stage in the existing Plan's preparation and adoption. The final SA/SEA (2015) was published on adoption of the Local Plan³.

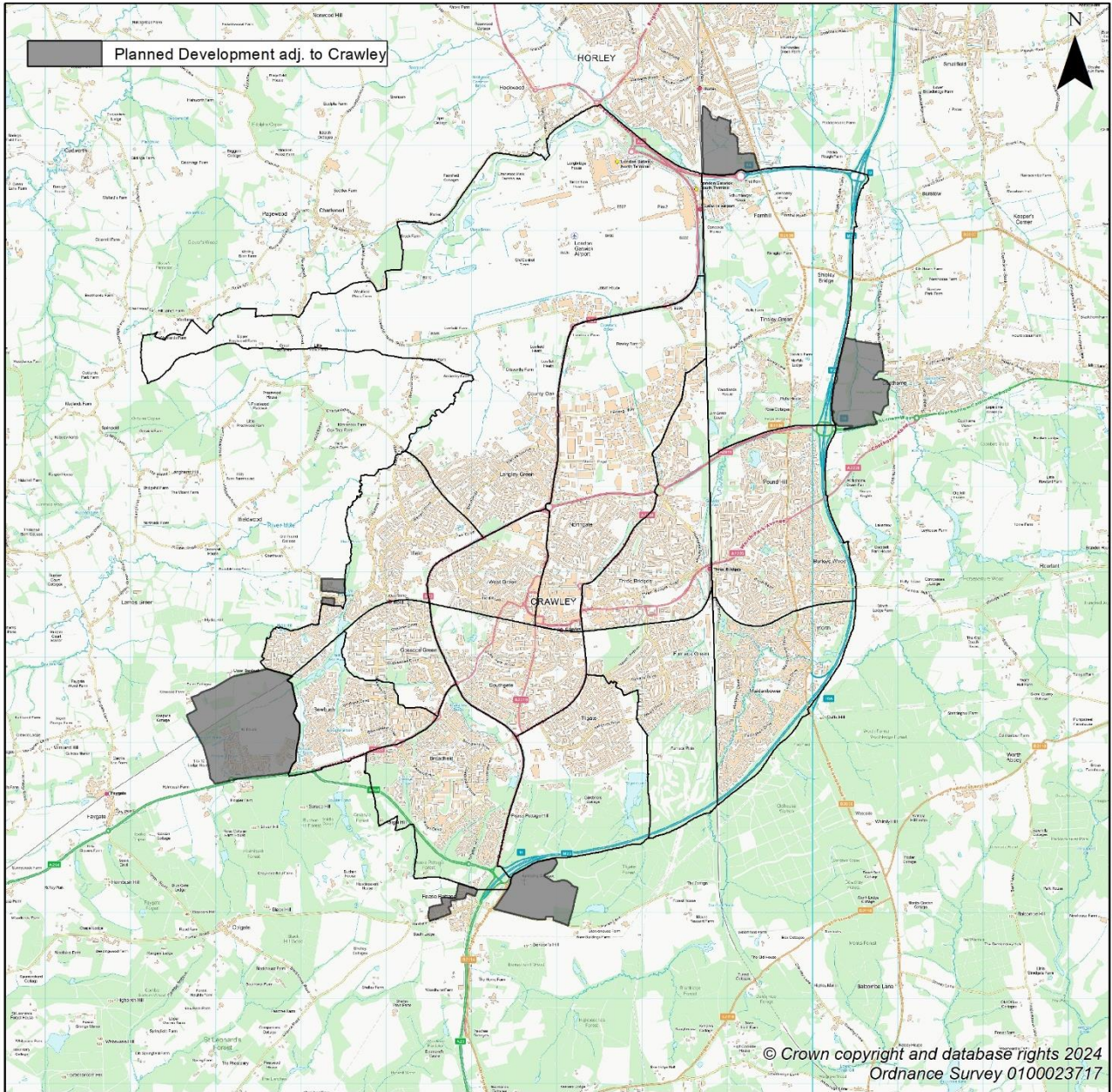
³ [Sustainability Appraisal/Strategic Environmental Assessment Post Adoption Statement Sustainability Appraisal/Strategic Environmental Assessment](#) (December 2015)

- 2.15 This SA/SEA reviews the previous SA/SEA conclusions and updates where changes are proposed. Where relevant, new options have been considered against the approach taken in the adopted Plan.
- 2.16 For the first stage of the SA/SEA scoping of the Local Plan, the council collected contemporary information on social, environmental and economic issues in the borough. This is known as the 'baseline' data. This information was collected from monitoring carried out in the past, and other sources, and enabled the key issues facing the borough today to be identified.
- 2.17 The next stage of the process identified and analysed all plans, programmes and policies that could impact upon the Local Plan. These plans, programmes and policies include documents from international to local levels. The documents also provided further information about the borough, which were included in the baseline data. The evidence base prepared for the Local Plan has been used as the basis for the SA baseline data where appropriate.
- 2.18 From this information, Sustainability Objectives were identified to assess the emerging policy options in the Local Plan against. The Sustainability Objectives were compared with each other and against the overall objectives of the Local Plan. This process enabled any conflicts between the objectives to be identified. By identifying these conflicts, possible ways of reducing or resolving conflicts between Local Plan policies and the achieving of sustainable development could be found.
- 2.19 The SA has been prepared by Crawley's Strategic Planning Department who are also responsible for the development of the Local Plan. Internal and external stakeholders have been involved in the Sustainability Appraisal of the Local Plan. A list of consultees is included at Appendix A.
- 2.20 Responses received as part of the early engagement consultation on the scoping and draft SA/SEA report are set out in Appendix B. Responses received as part of the initial Publication consultation stage on the draft SA/SEA are set out in Appendix C, to the second Publication consultation stage set out in Appendix D and to the third Publication consultation stage set out in Appendix E. These have been considered and incorporated into this SA/SEA document where considered appropriate.

Plan Area

- 2.21 The focus of the Local Plan will be upon Crawley borough, see Figure 2.1.
- 2.22 However, further growth to meet Crawley's needs within neighbouring authority areas cannot be ruled out at this stage if this is required and determined by neighbouring authorities. Development already coming forward adjacent to the borough's administrative boundary is also shown on Figure 2.1.
- 2.23 Therefore, whilst the SA/SEA undertaken for such developments would be the responsibility of the relevant Planning Authority in which the site is located, the baseline information and assessments undertaken for this SA report could be applied to areas beyond the boundary of Crawley during the life of the Plan.
- 2.24 This approach fits with the overall Spatial Strategy considered to be appropriate through this SA/SEA, as set out in Section 5 and Appendix F.

Figure 2.1: SA/SEA Boundary - the Borough of Crawley



3.0 OVERVIEW OF THE LOCAL PLAN

Introduction

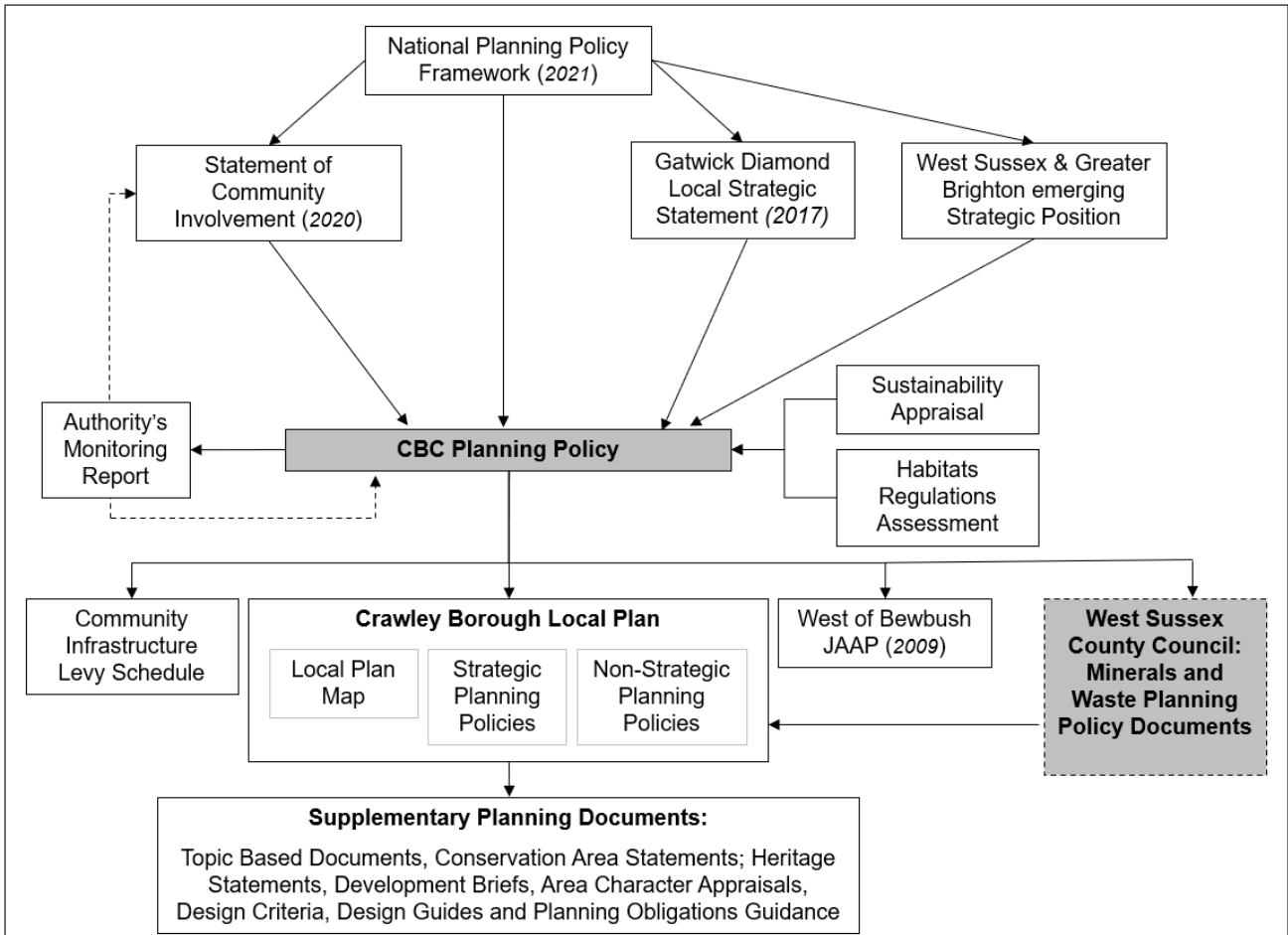
- 3.1 In light of the requirement for Local Planning Authorities to maintain up-to-date Plans, Crawley Borough Council is undertaking a refresh and update of its adopted Local Plan.
- 3.2 The Local Plan Review considers changes to the National Planning Policy Framework published in 2021⁴ and updated evidence. A key aim of the Local Plan is to ensure that the borough continues to develop sustainably.
- 3.3 The Local Plan Review remains a single document, setting out the policies to guide both strategic development and development management over the period 2023 – 2040. These policies will replace those of the adopted Crawley Borough Local Plan 2015 – 2030 (Crawley 2030).

The Local Plan and National Planning Policy Framework (NPPF)

- 3.4 Crawley currently has an adopted up-to-date Local Plan (2015): Crawley 2030; the West of Bewbush Joint Area Action Plan (2009), and a number of Supplementary Planning Documents (SPD) that cover subjects including affordable housing, climate change, green infrastructure, town centre and urban design, as well as location-specific Conservation Area Statements and Development Briefs.
- 3.5 In addition, West Sussex County Council have adopted the Joint Minerals Local Plan (2018, partial review 2021) and the Waste Local Plan (2014) which cover the Crawley borough area. The Waste Local Plan was subject to a five-year review in 2019. This review concluded that the Plan remains relevant and effective.
- 3.6 The Local Plan is informed by a wide range of requirements, recommendations and guidance, from documents produced at an international level all the way down to a local level. Such documents include national planning policies which are provided in the form of the National Planning Policy Framework. Alongside this, the government publish an online system of planning practice guidance to support the implementation of the national policies.
- 3.7 A simplified diagram of the key documentation accompanying the adopted Local Plan is shown at Figure 3.1.
- 3.8 The Local Plan will respond to changed economic circumstances affecting growth and employment. It will plan for changes to housing supply and demand influenced by the demographic needs and economic future of Crawley.
- 3.9 Although the SA/SEA is being prepared in tandem with the Local Plan, its focus is not solely upon the Plan, but will be used to appraise all subordinate SPDs.

⁴ National Planning Policy Framework (2021) MHCLG <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

Figure 3.1: Relationship between documents



Local Plan Review

- 3.10 Through continual and annual monitoring, the adopted Local Plan (Crawley 2030) has been assessed as being up-to-date and successful:
1. Maintains a five year land supply for housing (10.4 years supply for 2022-2027);
 2. Exceeds the Housing Delivery Test (2022 Housing Delivery Test result for Crawley = 362%);
 3. Secures 40% affordable housing on residential developments with planning permission;
 4. Success in appeals (173 appeals in total between April 2015 and March 2023; of which 122 (71%) were dismissed and 47 were allowed, and four allowed in part);
 5. Progress on town centre development sites (two complete, one under construction; one with planning permission);
 6. Adoption of five Supplementary Planning Documents, two Development Briefs and five Conservation Area Statements.
- 3.11 The Local Plan was formally reviewed at Full Council in December 2020⁵, which approved the Local Plan Five Year Policy Assessment⁶. This confirmed the policies remain up-to-date for the purposes of Development Management decisions⁷.

⁵ The Cabinet Report which went through Full Council on 16 December 2020 can be accessed from this link:

<https://democracy.crawley.gov.uk/ieListDocuments.aspx?CId=162&MId=3036&Ver=4> (Item 6; Recommendation 2.3d)

⁶ Crawley 2015 – 2030 Adopted Local Plan Five Year Policy Assessment⁶: https://crawley.gov.uk/sites/default/files/2021-01/Crawley_2015_2030_Adopted_Local_Plan_five_year_policy_assessment.pdf

⁷ Minutes from Full Council: <https://democracy.crawley.gov.uk/documents/g3041/Public%20minutes%2016th-Dec-2020%2019.30%20Full%20Council.pdf?T=11>

- 3.12 Despite there being no urgent need to review the Local Plan, the council began to undertake its review in August 2018, following publication of the government’s consultation draft of the National Planning Policy Framework and accompanying practice guidance which provided greater guidance in relation to the maintenance of an-up-to-date plan and the five-year review process.
- 3.13 This review considered, and discounted, the alternative options of:
- preparing a Joint Plan with one or more neighbouring authorities;
 - partial review of specific policies and ‘saving’ some existing policies;
 - starting from a blank page and creating a new strategic spatial strategy and a completely new full set of policies; and
 - concluding, following review, there is no need to update the document.
- 3.14 This Local Plan Review, instead, has involved a comprehensive review of the existing Local Plan whilst maintaining the overall strategic approach, continuing Duty to Cooperate discussions and taking a policy-by-policy approach to the degree of amendment or retention of individual policies. Consideration was given to a range of new policies to be introduced through the plan-making process. This has allowed for the baseline evidence to be updated where necessary, new policies to be considered, and existing policies to be reassessed in light of updated national and local positions.
- 3.15 This approach allowed for the greatest degree of accountability for the Local Plan and ensures it remains robust and up-to-date. The review of the adopted Local Plan also afforded the council the opportunity to build upon the lessons learnt during the preparation of the existing Local Plan.
- 3.16 The timetable for the adoption of the Local Plan is shown in Table 3.1.

Table 3.1: Local Plan Development Timetable

Key Milestone	Anticipated Programme Date
Early Engagement Consultation	15 July – 16 September 2019
Initial Publication Consultation	20 January – 2 March 2020
Additional Publication Consultation	6 January – 30 June 2021
Further Publication Submission Consultation	9 May – 20 June 2023
Submission	31 July 2023
Examination Hearing Sessions	21-23 November 2023 9-11 January 2024 16 January 2024
Modifications Consultation	12 February – 25 March 2024
Adoption	July 2024

- 3.17 For each of the Topic areas listed in the following chapter, the plans and programmes most relevant are highlighted in detail in the relevant section of Appendix E. This area has been continually developed as the Local Plan Review has progressed, to ensure the relationship

between the plans, policies and programmes has been discussed in relation to the emerging Local Plan policies.

Early Engagement Consultation

- 3.18 From 15 July to 16 September 2019, the council published a draft consultation Local Plan for the purposes of early engagement that residents, businesses and other stakeholders were invited to comment upon, in accordance with Local Planning Regulations, Regulation 18⁸. This document set out the council's "preferred strategy" for the Local Plan Review, and contained initial draft reviewed, new and retained planning policies. This included issuing a draft Sustainability Report, which covered both the Sustainability Appraisal and the Strategic Environmental Assessment requirements and a Habitats Regulations Screening Report.
- 3.19 The responses to the consultation undertaken in 2019 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 comments received relating to the draft Sustainability Report can be found in Appendix B of this report. The comments have fed into the preparation of this Sustainability Appraisal report for the Submission Local Plan.

January 2020 Initial Publication Consultation

- 3.20 Following a Full Council decision, in December 2019, to approve the draft Local Plan for Publication and Submission, an initial stage of formal public consultation took place, in accordance with Regulation 19⁹, between January and March 2020. A draft SA/SEA was published for the same six-week consultation alongside the draft Local Plan. Representations received in relation to the earlier draft SA/SEA during that period are set out in Appendix C.

January 2021 Additional Publication Consultation

- 3.21 An updated draft SA/SEA Report was made available for consultation in tandem with the additional Regulation 19 consultation on the Local Plan Review which was carried out between January and June 2021. This followed a further Full Council decision which approved an updated draft Local Plan and supporting Key Documents for Publication and Submission in December 2019. The extended period of consultation allowed for full consultation to take place on the Local Plan as well as all of the evidence completed to advise the Local Plan in its preparation.

May 2023 Further Publication Consultation

- 3.22 Progression of the Local Plan to Submission was subsequently delayed due to the work required in order to meet the Habitats Regulations specifically in relation to water supply constraints¹⁰. Due to the unique and complex nature of the issue, the extent of this was previously unknown and could not have been predicted in advance. However, it was considered that there is now sufficient information available to address these concerns through the Local Plan Review.
- 3.23 The draft SA/SEA Report (May 2023) was available for consultation in tandem with the further Regulation 19 consultation on the Local Plan Review between May and June 2023. The changes to the draft Local Plan reflected the new requirements in relation to water neutrality, along with

⁸ Regulation 18, Town and Country Planning (Local Planning) (England) Regulations 2012: <https://www.legislation.gov.uk/uksi/2012/767/contents/made>

⁹ Regulation 19, Town and Country Planning (Local Planning) (England) Regulations 2012: <https://www.legislation.gov.uk/uksi/2012/767/contents/made>

¹⁰ Water Neutrality in Crawley Webpage: [Water neutrality in Crawley | Crawley GOV](#)

factual updates due to the Plan timetable delays, changes in national planning policy and additional evidence.

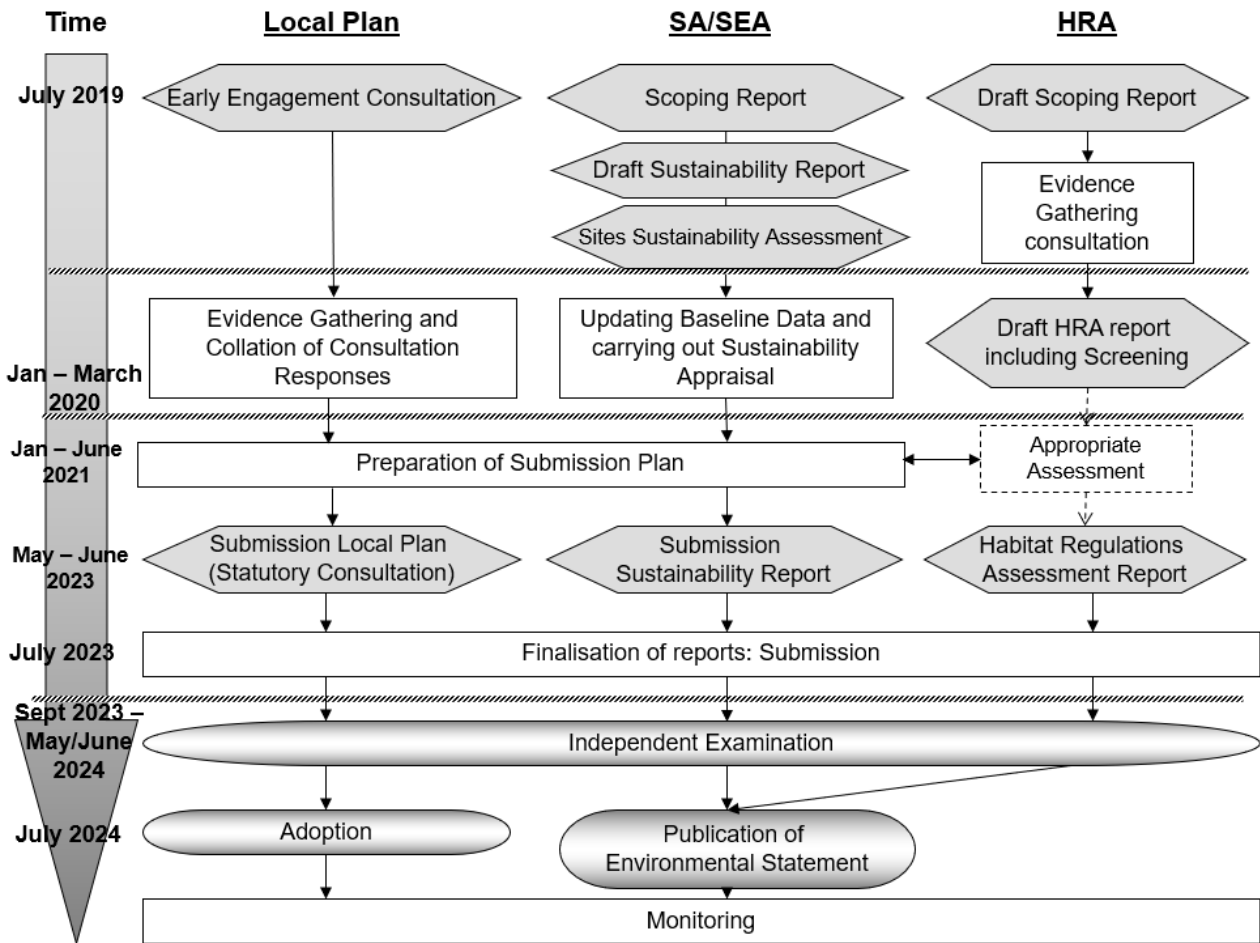
Modifications Consultation

- 3.24 Following the submission of the Local Plan in July 2023 to the Secretary of State, two Planning Inspectors were appointed to undertake its independent Examination. Two stages of Hearing Sessions were held, to allow the Inspectors the opportunity to investigate further into matters of the legal compliance and soundness of the Crawley Borough Submission Local Plan:
- Part 1 Hearing Sessions: 21 – 23 November 2023
 - Part 2 Hearing Sessions: 9 – 11 January, and 16 January 2024
- 3.25 During the Examination process, a number of additional documents were provided to support the evidence and policies within the Local Plan.
- 3.26 On 30 January 2024, the Inspectors issued their post-hearing letter. This confirmed a series of Main Modifications they considered necessary to address soundness issues, particularly in relation to Effectiveness of the Plan. These Main Modifications, along with additional modifications proposed by the council for factual and clarity purposes, are published for a formal six-week public consultation.
- 3.27 Where the modifications to the Local Plan has resulted in amendments to this SA/SEA, these have been carried out in this latest version of the SA/SEA (February 2024).

Crawley Borough Local Plan 2023 – 2040

- 3.28 The draft Crawley Borough Local Plan addresses development proposals including the long-term housing and employment land supply position for the period up to 2040. It includes policies to guide the location and type of new development, and to protect valued elements of natural and built environment; and sets out plans for the implementation of infrastructure supporting it.
- 3.29 The Local Plan has been prepared using the evidence base and consultation feedback. The early engagement consultation and preparation of draft policies and options for the Local Plan identified initial objectives for the planning and delivery of development in Crawley. These objectives were considered during the Sustainability Appraisal and fed into the draft Local Plan. They have evolved alongside the Local Plan with the preparation of the SA/SEA and the assessments forming an iterative process interlinked with the changes as part of the Local Plan Review. Figure 3.2 shows how the SA and HRA timetables align with the Local Plan production.

Figure 3.2: SA and HRA Production with the Local Plan



4.0 CRAWLEY AND THE SUSTAINABILITY APPRAISAL TOPIC AREAS

Introduction to Crawley

- 4.1 Crawley borough covers 4,497 hectares of land in the north east of West Sussex county and is predominately urban in character, although the town is surrounded by countryside lying mostly in neighbouring authorities. Horsham district abuts the town to the west, Mid Sussex district to the south and east, whilst the county of Surrey is adjacent to the north of the town.
- 4.2 Crawley has its origins in the Middle Ages, or even earlier, although the majority of the town's urban form is derived from growth occurring post 1947 when it was designated as one of the 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 As a result of the planned approach to development, the town has extensive tree cover and semi-natural open spaces within the urban area. These features provide Crawley with a high quality natural environment and a sense of local distinctiveness, as well as a rich ecological infrastructure network throughout the town.
- 4.4 Fundamental to the urban form of the town is the principle of a town centre offering leisure and shopping opportunities, surrounded by a series of residential neighbourhoods, each with its own facilities and laid out preserving the best natural features of the countryside upon which the neighbourhoods were built. There are 13 neighbourhoods in the town, and development is ongoing on two more: Forge Wood, within Crawley's administrative boundaries, to the north of Pound Hill neighbourhood, and Kilnwood Vale, in Horsham District, immediately adjacent to the west of Bewbush neighbourhood. Significantly, the level of residential development within Crawley town centre has recently been increasing at a fast pace. This is anticipated to result in a population living within the town centre equivalent to a further neighbourhood¹¹.
- 4.5 As established in paragraph 2.21 and shown in Figure 2.1, there are a number of other existing developments coming forward immediately adjacent to the borough's administrative boundary: including 750 new dwellings in and around Pease Pottage; 500 new dwellings to the west of Copthorne; and almost 200 new dwellings along Rusper Road close to Ifield. A strategic office-led employment site has also been allocated as part of the adopted Reigate and Banstead Development Management Plan at Horley immediately adjacent to the borough boundary to the north of Gatwick Airport. Further major development is being promoted to the west and east of Crawley in Horsham and Mid Sussex districts.

Sustainability Appraisal Topic Areas

- 4.6 The social, economic and environmental impacts that may arise from the implementation of the borough's Local Plan are appraised on a topic basis. These have been condensed into nine overarching Sustainability Objectives that should be considered when proposing any development options or policies for the Local Plan. Baseline data has been collected to establish the existing situation within the borough and set out the most important trends and issues. Ideally, sustainable development in Crawley would result in positive effects on all the Objectives identified – although in reality it is likely compromises will have to be found and mitigation implemented to find a balance between social, economic and environmental needs.

¹¹ There were 219 residential units in 2014; and there are now over 1,100 residential units currently in 2023; a further 1,900 units are currently anticipated in the Housing Trajectory (through permissions, prior approvals and allocations) – increasing the total residential units in the town centre over the Plan period to potentially 3,000 dwellings.

- 4.7 The baseline data draws upon the evidence base being gathered for the development of the Local Plan; and existing information and statistics available from monitoring data. New information from monitoring data will be added as it is identified to allow the spatial objectives of the Local Plan to be regularly assessed and prioritised.
- 4.8 Statistics and trends are quoted from information available at the time of writing. Crawley reviewed its monitoring arrangements for both the Local Plan and the Sustainability Appraisal as part of the existing Local Plan’s preparation and adoption¹². Since its adoption, the Crawley Borough Local Plan (2015) has been regularly monitored against the policy and SA indicators. The outcomes of this monitoring have been published in the Authority’s Monitoring Reports¹³.
- 4.9 The SEA Regulations and government guidance require that the policies, plans, programmes and objectives that influence the production of the Local Plan should be identified in the SA. The lists presented under each of the topic areas A to G are unlikely to be comprehensive because a number of the higher-level plans, policies and programmes are interpreted into lower level local documents. Where conflicts between plans, policies and programmes exist, the council will aim to identify them during Sustainability Appraisal and discuss the approach to resolving the conflict.
- 4.10 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, Water Neutrality, Sustainability, Sustainable Design and Construction	energy efficiency, flooding, air quality, noise, waste 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	economic growth and social mobility, maximising benefits of Gatwick Airport, revitalised and vibrant town centre	
E	Natural Environment	countryside, landscape, trees, biodiversity, greenways and green open space	<i>Biodiversity, Landscape, Air Quality, Fauna, Flora and Soil</i>
F	Transport and Infrastructure	roads, rail, public transport, walking, cycling, Gatwick Airport, infrastructure	

¹² [LP141 Monitoring and Implementation Framework for the Crawley Local Plan 2015-30 \(2015\)](#)

¹³ [Crawley Borough Local Plan Authority Monitoring Report 2021/22](#)
[Crawley Borough Local Plan Authority Monitoring Report 2020/21](#)
[Crawley Borough Local Plan Authority Monitoring Report 2019/20](#)
[Crawley Borough Local Plan Authority's Monitoring Report 2018/19](#)
[Crawley Borough Local Plan Authority's Monitoring Report 2017/18](#)
[Crawley Borough Local Plan Authority's Monitoring Report 2016/17](#)
[Crawley Borough Local Plan Authority's Monitoring Report 2015/16](#)

Topic Area		Scope of Topic	Links to SEA Directive
G	Population, Community Facilities and Open Spaces, Crime and Health of the Community	Demographics, educational establishments, community halls, open space, sport and recreation provision	<i>Population, Human Health</i>

Current Sustainability Issues

4.11 From the examination of the baseline data and the plans, programmes and policies that will influence the Local Plan, it has been 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:	
1. To mitigate climate change, by taking actions to reduce the concentration of greenhouse gases in the atmosphere.	
Climate Change	Crawley as a dense urban area has a high level of carbon emissions and anticipated development, which will contribute towards the causes of climate change. In addition, it is also identified as an area of radiant energy and subject to serious water stress. Therefore, its adaptation towards climate change will provide opportunities to harness and threats to be addressed.
Energy Supply	Crawley remains an energy- and carbon-intensive economy, with a high level of commercial and transport emissions, a legacy of post-war building stock, and a continuing reliance on gas as a domestic heat source, although emissions are declining and deployment of renewable and low/zero carbon energy infrastructure – notably solar PV and heat networks – is gaining momentum.
Waste	Crawley falls within the West Sussex strategy for managing waste. This promotes sustainable waste management. Crawley Borough Council is responsible for household waste and recycling collection. Commercial waste is collected by the private sector and disposal facilities come under WSCC. The majority of Crawley's household waste goes to the Mechanical Biological Treatment (MBT) facility at Brookhurst Wood. Only a very small amount, mainly dog faeces, continues to go to landfill, located at Redhill. The former Brookhurst Wood landfill is now closed. Reducing overall waste production and increasing the amount recycled, reused or composted will remain a key issue and this will be even more prevalent with the increase in the borough's population in the future. This is likely to put pressure on existing waste management services.
Pollution	Crawley's role as an economic hub and transport interchange means the town's contribution to air, land, water and noise pollution is likely to increase.
Air Quality	In the context of an expanding town and international airport, maintenance of air quality may become increasingly problematic. It is important that opportunities are taken to improve local air quality conditions, and as a minimum, mitigate the impacts of the development through good design and sustainable building measures that promote good air quality.
Noise	Noise from a range of sources has the potential to affect people living, working in and visiting Crawley, particularly aircraft noise in the north of the borough. Due to the urban nature of Crawley noise sources and exposure vary. There are relatively tranquil areas, such as within Crawley's large parks, ranging to much noisier areas close to the

Crawley's Sustainability Issues:	
	M23, Main Employment Areas, and land close to Gatwick Airport. The degree to which this will affect people could be influenced by the proximity of development to noise sources or receptors, and also the future level of growth of Gatwick Airport.
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.	
Flooding	Crawley borough falls entirely within the upper reaches of the River Mole catchment, with areas at risk of flooding from fluvial sources. River flooding is not the only source of flood risk; Crawley is at the highest risk of surface water flooding in West Sussex, whilst flood risk from groundwater and sewer sources must also be considered. Development must be planned sustainably with flood risk from all sources in mind to ensure the well-being of its future users over the lifetime of development, whilst ensuring that it does not increase flood risk elsewhere.
Water Supply	The potential for development to be concentrated in the Crawley area may lead to water supply issues, particularly given current levels of serious water stress. The Southern Water Sussex North Water Resource Zone is supplied from a groundwater abstraction in the Arun Valley and it has not been demonstrated, with certainty, that this abstraction is not having an adverse effect on the integrity of Internationally Designated Habitat sites. One way of preventing any further negative impact is to ensure that all new development is water neutral. Water neutrality is defined as 'development which does not increase the rate of water abstraction for drinking water supplies above existing levels'.
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.	
Quality of Life	There is a need to enhance quality of life to ensure Crawley remains a place where people want to live.
Land Supply	The borough is characterised as a town within a countryside setting. The borough's administrative boundaries run close to the Built-Up Area Boundary in most cases, with Gatwick Airport located within the borough's boundaries to the north. Due to these factors, and the requirement to safeguard land for a possible southern runway at Gatwick Airport, land supply in the borough is severely limited, meaning the borough's abilities to meet its own needs (economic and housing development, infrastructure, and other open space and recreation land requirements) is highly constrained.
Heritage	Crawley's heritage comprises the accumulated physical remains of earlier human settlement and activity in the locality. Crawley's heritage assets include more obvious landmarks such as churches, the High Street, and older village cores, as well as older archaeological remains and modern development from the borough's 'New Town' era. Conservation and enhancement of these assets can improve wellbeing by providing a tangible link to a longer historical story.
4. To ensure that everyone has the opportunity to live in a decent and affordable home.	
Housing Delivery	Local housing delivery is sensitive to the national economic climate.
Housing Stock	The housing stock does not match the need and aspirations of the borough in terms of house type and sizes. The age of much of the existing housing stock means it is unable to meet needs of the borough to manage climate change emissions. The fabric of buildings requires retrofitting in order to secure energy efficiency benefits.
Affordable Housing	Affordable housing provision does not match the significant level of need.

Crawley's Sustainability Issues:	
5. To maintain, support and promote a diverse employment base that can serve the local and sub-regional and regional economy.	
Investment Attractiveness	There is a need to ensure Crawley remains a place where businesses and people want to invest, in order to support sustainable economic growth.
Economic Land Supply and Building Stock	The constrained land supply means there is insufficient land available to meet the development needs of the business and industrial uses. There is a mismatch between the quality of the existing building stock and the current needs of the changing economy, both within the dedicated business areas and within the town centre. A lack of a business hub in Manor Royal leaves a gap in the needs of the businesses located in this area.
Social Mobility and Skills Gap	There is a recognised disparity between the, on average, lower level of qualifications and income achieved by people that live in Crawley and those of the in-commuting workforce, which are on average higher. Therefore, Crawley residents are less likely to access higher-skilled, higher paid jobs. This is reflected in Crawley's position close to the bottom of social mobility rankings published in the 2017 State of Nation report, where Crawley ranked 304th out of 324 local authorities. Significant forecast job growth in Crawley presents the opportunity to maximise skills development and employment opportunities for local people.
Changing Economy	The economic structure of the town is dominated by large scale airport related business, supported by a broader range of sectors including storage & distribution, research and design, and professional services. The recent economic implications arising from COVID-19 have shown Crawley's economy to be very reliant on the aviation sector, and as identified by the Economic Recovery Plan (2021) there is need to support continued economic recovery and diversification
Retail Competitiveness	The retail sector of the town's economy has faced challenges in recent years, particularly as a result of competition from online and out-of-centre retailers, and with shopping habits further evolving as a result of the COVID-19 pandemic. Improvements to the quality and diversity of the town centre has already been taking place in response to this.
Growth of Gatwick Airport	Prior to the COVID-19 pandemic, passenger numbers at Gatwick Airport had been continuously increasing (now returning close to their pre-pandemic peak), which has a positive impact on the local economy, supporting jobs on-airport and also indirectly in the local area, encouraging businesses to locate and invest in Crawley. There is a need to support the continued economic recovery of aviation related sectors, whilst also supporting the diversifying of Crawley's economy so that it is more responsive to change.
Town Centre Neighbourhood	An increasing residential population has seen the town centre becoming a neighbourhood in its own right, increasing the need for supporting facilities to serve the residential population. There is a need to balance the commercial function of the town centre with its role as a place to live. Potential conflicts may occur between amenity-sensitive residential use and the need to support a vibrant night-time and evening economy. A predominance of smaller dwellings and housing mix within the town centre pose challenges to ensure balanced community.

Crawley's Sustainability Issues:	
6. To conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough and minimise harm to those outside Crawley's administrative boundaries from activity within the borough.	
Green Infrastructure	The lack of development land is increasing the threat to nature areas, open spaces and green infrastructure within the urban environment. Connectivity of green corridors can be limited due to the urban nature and built form of the borough.
Biodiversity	Development in the borough will impact on biodiversity, fauna, flora and soil. In order to address the historic overall loss of biodiversity within the borough, opportunities should be taken for ensuring 'Net Gain' and delivery of the Pollination agenda. Parts of Crawley are supplied water from a groundwater abstraction which cannot, with certainty, conclude no adverse effect on the integrity of Internationally Designated Habitat sites.
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.	
Transport Demand	The growth of the town will increase pressures on transport infrastructure that is already approaching capacity. Bus use in Crawley is high, but further improvements to public transport and active travel modes are needed to encourage modal shift towards sustainable transport options. Major new developments can also be planned and designed in a way that both encourages and enables increased transport modal share. Airport-related parking must be sustainably located within the Gatwick Airport boundary. Parking provision requirements can influence car ownership.
8. To ensure the provision of sufficient infrastructure to meet the requirements of the borough.	
Infrastructure provision	The rate of development, particularly residential and also airport growth, requires careful management to ensure that it does not outstrip the borough's infrastructure.
Sewerage	The potential for development to be concentrated in Crawley may lead to sewerage capacity problems.
Community Facilities	The changing population demographics are creating a mismatch between the need for housing and community facilities and current provision. Over-demand on leisure facilities means these are nearing capacity.
9. To promote healthy, active, cohesive and socially sustainable communities. To ensure all benefit from a good quality of life. To ensure everyone has the opportunity to participate in sport and to encourage active lifestyles.	
Ethnic Diversity	The population of Crawley is notably diverse in comparison to the national average resulting in specific development demands.
Young Population	Crawley has a high proportion of young children compared with other West Sussex local authorities. The educational attainment of children qualifying for free school meals in Crawley is notably below average.
Ageing Population	Due to its New Town history, Crawley has an increasingly ageing population which is increasing pressures on services and the built environment at the same time.
Street Community and Homeless	There is a small but significant population who are spending nights on the streets, primarily within Crawley town centre.

Crawley's Sustainability Issues:	
Arts & Culture	Crawley's population has a low participation rate in arts and cultural activities. Low levels of cultural economic opportunities or businesses.
Crime	There is a need to reduce crime and the perception of crime.
Health	Physical activity in the borough is below average.
Health Care	Provision of health facilities and services is at or over capacity in most parts of the borough, e.g. GP provision.
Open Space, Sport and Recreation	Increasing demand on parks, sports facilities and open spaces means these are nearing capacity. The lack of development land is increasing the threat to open spaces and sport and recreation facilities within the urban environment.

The Sustainability Objectives and Indicators

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

Table 4.3: Sustainability Objectives and Monitoring Indicators

Objectives	Examples of Indicators
1. To mitigate climate change, by taking actions to reduce the concentration of greenhouse gases in the atmosphere.	<ul style="list-style-type: none"> • CO₂ reduction from Local Authority activities; • Per capita greenhouse gas and total emissions in the local authority area, including the breakdown for domestic buildings; industry; transport; and land use, land-use change, and forestry; • Quantity of Residual household waste collected per household; • Proportion of household waste recycled or composted; • Amount of new development which achieves moderate and high density levels meeting the requirements of Compact development, providing the potential to create efficiencies in the use of other resources, including energy supply, services and transportation.
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.	<ul style="list-style-type: none"> • Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds; • Per capita water consumption; • Number of planning permissions where Thames Water request a drainage planning condition; • Trends in annual mean NO₂; • Trends in annual mean PM₁₀ concentrations; • Proportion of new dwellings with single aspect windows facing within 45 degrees of east, west and south • Number and Type of new noise sensitive uses in areas currently and potentially affected by unacceptable noise.

Objectives	Examples of Indicators
<p>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.</p>	<ul style="list-style-type: none"> • Number of Listed Buildings on the Buildings at Risk Register; • The percentage of Conservation Areas with up-to-date Appraisals (i.e. last five years); • Proportion of the borough covered by up-to-date Area-Wide Character and Design Assessments.
<p>4. To ensure that everyone has the opportunity to live in a decent and affordable home.</p>	<ul style="list-style-type: none"> • Plan period and housing delivery targets; • Net additional dwellings – in previous years; • Net additional pitches (Gypsy and Traveller); • Gross affordable housing completions; • Mix of affordable housing delivered compared to indicative housing provision by no. of bedrooms identified in the most recent SHMA; • Mix of market housing delivered compared to indicative housing provision by no. of bedrooms identified in the most recent SHMA; • Estimated number of households in housing need; • Median workplace-based affordability ratio; • Supply of ready to develop housing sites (five-year housing land supply); • New and converted dwellings on previously developed land; • Average density of new residential development.
<p>5. To maintain, support and promote a diverse employment base that can serve the local and sub-regional and regional economy.</p>	<ul style="list-style-type: none"> • Amount of new business land and floorspace delivered; • Percentage of people aged 16 – 74 with no (or other) qualifications; • Working age population qualified to at least NVQ Level 4 or Higher; • Completed loss of employment floorspace to residential use via planning permissions in main employment areas; • Number of residential dwellings built in the Town Centre; • Vacancy rate for ground floor commercial units in Primary Shopping Area; • Completed Town Centre Neighbourhood Facilities by sqm. floorspace.
<p>6. To conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough and minimise harm to those outside Crawley’s administrative boundaries from activity within the borough.</p>	<ul style="list-style-type: none"> • Amount and type of development within areas designated for their nature importance; • Amount of trees with Tree Preservation Orders lost per annum; • Amount and type of open space, sport and recreational spaces lost/gained per annum; • Number of trees and soft landscaping secured on site or through S106 contributions; • Hectares/percentage of land in Crawley identified as Local Wildlife Sites; • Hectares/percentage of land in Crawley identified as Ancient Woodland; • Number of goals within a Management Plan met in a specified time period (five years); • Number of Management Plans renewed in a five year cycle; • Change in areas of biodiversity importance; • Improved Local Biodiversity – proportion of Local Sites where positive conservation has been or is being implemented;

Objectives	Examples of Indicators
	<ul style="list-style-type: none"> • Percentage of Biodiversity Net Gain secured from new developments; • Net change in water demand within the part of Crawley which falls within the Sussex North Water Resource Zone.
<p>7. To reduce car journeys and promote sustainable and alternative methods of transport, whilst ensuring sufficient transport infrastructure is delivered to meet the requirements of the borough.</p>	<ul style="list-style-type: none"> • Access to services and facilities by public transport, walking and cycling: The proportion of housing delivered on major and significant scale developments which achieves the appropriate minimum densities; • Proportion of significant scale developments which are high or moderate density and provide appropriate public transport accessibility; • Children travelling to school – mode of transport usually used; • Proportion of adults who do any walking or cycling, for any purpose; • Proportion of new development with appropriate layout of pathways to encourage walking and cycling; • Change in number of publicly available Electric Vehicle Charging Points within the borough; • Number of passengers and staff using Gatwick Airport per annum and percentage arriving by public transport; • Per capita and CO₂ emissions from transport (also see Objective 1).
<p>8. To ensure the provision of sufficient infrastructure to meet the requirements of the borough.</p>	<ul style="list-style-type: none"> • Rate of residential and commercial development to be in accordance with Local Plan annualised requirements and local commercial requirements; • Provision of identified priority infrastructure schemes (monitored through the Community Infrastructure Levy and Infrastructure Plan) • <u>Progress in delivery of critical infrastructure projects identified in Infrastructure Plan: Appendix 2 (Infrastructure Delivery Schedule), December 2023 – or future updates – alongside housing and employment development, in accordance with the Phasing Chart in the Schedule;</u> • Quantity or extent of development where a contribution is required to fund or part-fund the delivery/improvement or expansion of sustainable transport infrastructure, and particularly in relation to significant developments.

Objectives	Examples of Indicators
<p>9. To promote healthy, active, cohesive and socially sustainable communities. To ensure all benefit from a good quality of life. To ensure everyone has the opportunity to participate in sport and to encourage active lifestyles.</p>	<ul style="list-style-type: none"> • Self-reported measure of people’s overall health and wellbeing; • Participation of 17 year olds in education or training; • Percentage of people aged 16 – 64 with no qualifications; • GP/CCG/WSCC Public Health data; • Total Recorded Crime; • Rate of public place violence offences; • All-age all-cause mortality rate; • Healthy life expectancy at age 65 years; • Proportion of physically active adults age 19 and above; • Percentage of Year 6 children identified to be obese. • Completed Town Centre Neighbourhood Facilities by sqm. floorspace. • Proportion of physically active adults age 19 and above; • Participation rate in arts and culture.

5.0 SPATIAL STRATEGY AND REASONABLE ALTERNATIVES

Local Plan Options

- 5.1 The Local Plan Review offered the council the opportunity to reassess existing policies in light of new national and local priorities, guidance and evidence and to consider potential new policies for their inclusion in the Local Plan, building on the successful implementation of the existing Plan.
- 5.2 In scoping the extent of the Local Plan Review, the following high level options for undertaking the update to the borough's Local Plan were reconsidered:
- Option 1: Preparing a Joint Plan with one or more neighbouring authorities;
 - Option 2: Partial Review of specific policies and 'Saving' some existing policies;
 - Option 3: Comprehensive Review of the adopted Local Plan, maintaining overall strategic approach, continuing Duty to Cooperate discussions, and taking a policy-by-policy approach to the degree of amendment or retention of individual policies. Considering new policies to be introduced through the plan-making process;
 - Option 4: as with Option 3, but including a restructure of the Plan sections and chapters;
 - Option 5: Starting from a blank page and creating a new strategic spatial strategy and a completely new full set of policies; and
 - Option 6: Do not update the Local Plan and publish the review confirming the Plan is in conformity with national policy.
- 5.3 The full analysis of these options is set out in Appendix F.
- 5.4 The options analysis concluded that Option 4 would allow the greatest degree of accountability for the Local Plan and ensure it remains robust and up-to-date beyond the five year adoption date of the existing Local Plan (Crawley 2030). This option allowed for the baseline evidence to be updated where necessary, new policies to be considered, and existing policies to be reassessed and aligned in light of updated national and local positions.
- 5.5 On this basis, Option 4: a Comprehensive Review of the adopted Local Plan, taking a policy-by-policy approach to the degree of amendment or retention of individual policies, and considering new policies, including a restructure of the Plan sections and chapter, was taken.

Spatial Strategy Options

- 5.6 In considering the Chosen Option, to retain the Spatial Strategy from the existing adopted Local Plan, the previous Sustainability Appraisal was reconsidered, to ensure the outcomes continue to offer the best approach to pursue. The assessment included three scenarios:
- Scenario 1: A sub region with a South East regional focus;
 - Scenario 2: A sub regional focus;
 - Scenario 3: A Crawley Borough focus.
- 5.7 The updated Options Appraisal is set out in Appendix F.
- 5.8 A combination of Scenario 2 (a Sub-Regional Focus) and Scenario 3 (a Crawley Borough Focus) was chosen, again, as creating the most realistic and deliverable Local Plan to maximise sustainable development opportunities whilst protecting the quality of the environment for local residents, businesses and visitors.
- 5.9 The Local Plan Review offered the opportunity to update the scenarios, to introduce additional policies to reduce further the uncertainties identified in the SA appraisal initially, and to

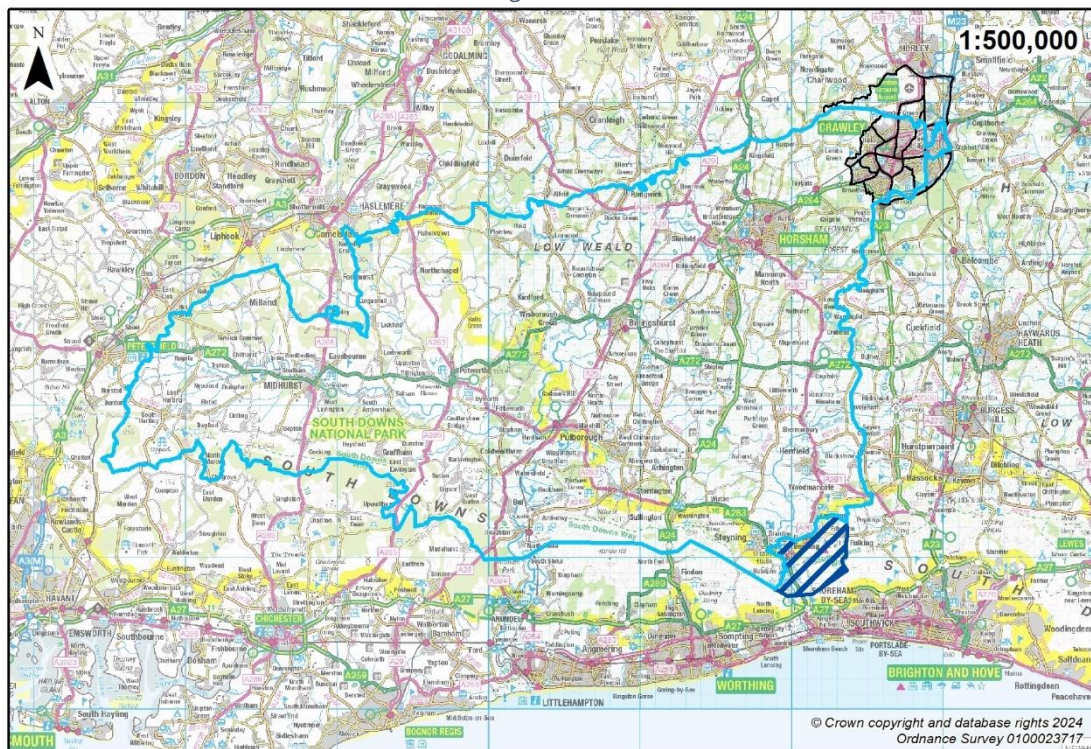
commission evidence which specifically provides intelligence on the particular needs and markets associated with Crawley.



- 5.10 For Scenario 2 (sub regional focus), this has included understanding the housing needs for specific groups within Crawley, including in terms of affordability, type and size mix of housing, as well as recommending an “At Crawley” approach for the purposes of Duty to Cooperate, and identifying the infrastructure needs both arising from within Crawley and also to provide a baseline against which the cumulative impacts of any further growth of Crawley can be assessed. It has also allowed for the introduction of new policies in relation to water neutrality and the safeguarding of an area of search for a potential western link multi-modal transport corridor, where this runs through Crawley.
- 5.11 For Scenario 3 (Crawley borough focus), this has allowed for the introduction of policies seeking to increase densities and maximise effective use of land, whilst only securing high quality design and form which complement the character of Crawley. In addition, the housing typology policies allow for a greater policy framework for positive planning on the windfall sites which will come forward over the Plan period. The extent of the safeguarding required for further expansion of Gatwick Airport was assessed to open up potential opportunities for balancing the needs of the Airport with other economic needs.

6.0 WATER NEUTRALITY AND THE LOCAL PLAN

- 6.1 All of Horsham District, most of Crawley Borough, and parts of Chichester District and the South Downs National Park fall within the Southern Water Sussex North Water Resource Zone (WRZ) as shown in Figure 6.1. Joint working in relation to water supply in these areas has been taking place since 2020.

Figure 6.1: Southern Water Sussex North Water Resource Zone (WRZ)



-  Sussex North Water Resource Zone (Water Neutrality)
-  Bamber/Upper Beeding (Sussex North Water Resource Zone, No Offsetting)

- 6.2 Natural England initially raised concerns in relation to water supply and the impact groundwater abstraction at Pulborough could be having on protected sites within the Sussex North Water Resource Zone in a letter to JBA Consulting (stakeholder feedback on the Gatwick sub-region Water Cycle Study) on 25th March 2020. On 14th September 2021, the authorities received a Position Statement from Natural England, formally advising them of Natural England’s concern that water abstraction for water supplies could be having a negative impact on the wildlife sites in the Arun Valley. Natural England advised that any new development taking place in the area must not add to this negative impact.

“The Sussex North Water Supply Zone includes supplies from a groundwater abstraction which cannot, with certainty, conclude no adverse effect on the integrity of;

- *Arun Valley Special Area Conservation (SAC)*
- *Arun Valley Special Protection Area (SPA)*
- *Arun Valley Ramsar Site.*

As it cannot be concluded that the existing abstraction within Sussex North Water Supply Zone is not having an impact on the Arun Valley site, we advise that developments within this zone must not add to this impact.”

Natural England’s Position Statement for Applications within the Sussex North Water Supply Zone September 2021 – Interim Approach

- 6.3 The full Position Statement can be accessed directly through the council’s Water Neutrality webpage: [Water neutrality position statement.pdf \(crawley.gov.uk\)](https://www.crawley.gov.uk/~/media/Assets/Information/Environment/Water%20Neutrality/Position%20Statement.pdf). It affects all land that falls within the Southern Water Sussex North Water Resource Zone.
- 6.4 The water supply in question is sourced from abstraction points in the Arun Valley, which also includes locations such as Amberley Wild Brooks Site of Special Scientific Interest (SSSI), Pulborough Brooks SSSI and Arun Valley Special Protection Area/ Special Area of Conservation (SPA/SAC) and Ramsar site (the Arun Valley Sites). The Arun Valley Sites are of international importance because of their inland water bodies, bogs, marshes, humid grassland, other water-dependent habitats, and overwintering waterfowl.
- 6.5 The Habitats Regulations 2017 (as amended) requires Local Authorities to demonstrate that there is no adverse ‘in combination’ impact on the integrity of SPAs and SACs. This means that by law, the Councils must prepare Local Plans that clearly show that they will not, either alone or in combination, have an adverse (or negative) effect on these important wildlife sites.
- 6.6 One way of preventing any further negative impact is to ensure that all new development is water neutral. Water neutrality is defined as ‘development which does not increase the rate of water abstraction for drinking water supplies above existing levels’. This means that for every new development, total water use in the region after the development must be equal to or less than the total water-use in the region before the new development.
- 6.7 Water neutrality has significant implications for the Local Plans, Neighbourhood Plans and Development Management across the Sussex North Water Resource Zone. Since September 2021, only planning applications that can demonstrate that they will not have an additional demand impact on water supply have been able to be permitted. A limited number of applications have been approved on this basis. However, it is difficult to do this on an individual basis because the Habitats Regulations require an analysis of ‘in combination’ impacts. In combination impacts can lead to significant potential for double counting and contradictory decisions, and the Development Management systems currently available to each affected authority are not yet set up to manage in combination impacts, without further work to develop a Water Neutrality Strategy and Implementation Scheme. The Water Neutrality Strategy is complete, supporting the Local Plan, and work is currently progressing on the Implementation Scheme, which is referred to as the Sussex North Offsetting Water Scheme (SNOWS).

Water Neutrality work carried out to date, and joint working

- 6.8 The affected local authorities have been working together closely to ensure that their Local Plans take a consistent approach which will ensure ‘in combination’ water neutrality. Whilst the different timelines for progression of the plans means that it is not possible to have a joint set of plan policies or a formal joint SA, the authorities have closely aligned their work, and the evidence underpinning the Plans has been undertaken jointly.
- 6.9 Detail of the progress and work that has taken place is set out in the Local Authorities’ Joint Water Neutrality Topic Paper (May 2023). A summary of the evidence secured to advise the authorities on this matter is set out in the following paragraphs of this Chapter.
- 6.10 The first stage of the work on water neutrality was carried out prior to Natural England issuing their Position Statement in September 2021. This arose from the joint Water Cycle Study commissioned by Crawley Borough, Horsham District, Mid Sussex District and Reigate and Banstead Borough Councils (August 2020). The advice from Natural England at that time was that water resources could only be addressed at a strategic level through Local Plans. Since the Water Supply Zone affected also included Chichester District, but not Reigate & Banstead Borough, the three Local Authorities, in discussion with Natural England and HRA consultants appointed by the councils, agreed to undertake further evidence work through a joint

commission, this being the Water Neutrality Study undertaken by JBA Consulting. Part A of the Water Neutrality Study, looking at planned growth in each borough/district, was prepared on an individual Local Authority basis, with JBA preparing the evidence jointly for Chichester District and Crawley Borough (July 2021), and AECOM providing the evidence for Horsham District (July 2021).

- 6.11 The second stage of the work (Part B) considered the total (or cumulative) impact of proposed development in all the Local Authority areas that use Sussex North Water Resource Zone. This included consideration of planned growth within the WRZ, as advised by South Downs National Park and West Sussex County Council. The purpose of this work was to understand how water demand may increase in the future and work out how much water will need to be ‘offset’ to mitigate the impacts of development through Water Neutrality. This work was completed and published in April 2022.
- 6.12 The third stage of the work (Part C) builds upon and updates previous work and sets out a water neutrality strategy for all affected authorities. This includes recommending a policy approach with regards to water efficiency standards in new development and setting out principles for an offsetting scheme, which together would allow the growth identified in Local Plans to come forward achieving water neutrality. The report for this stage of work was published in December 2022, having been agreed as a basis for ongoing joint work by the commissioning local authorities’ Chief Executive Officers, and endorsed by Natural England. Reports for this and previous stages can be found at: [Water neutrality in Crawley | Crawley GOV](#).
- 6.13 Further to the high-level strategy, appropriate governance structures have been put in place and a joint project manager recruited. A procurement exercise to obtain more detailed costings for implementing mitigation measures or offsetting, and development of the detailed processes and procedures for running and reporting a water neutrality implementation (offsetting) scheme are now in the process of being set up.
- 6.14 There is ongoing commitment to work jointly on these matters. This, where relevant, has led to the assessment of common policy options and issues as part of the sustainability appraisal process.

Water Efficiency and Offsetting New Water Supply

- 6.15 The issues of water efficiency and scale of development are interlinked because the more water efficient new developments are, the less offsetting that is required, meaning a higher scale of new development can be permitted. However, the potential for both water efficiency and offsetting are finite, thus constraining the amount of development possible in an area.
- 6.16 The Water Neutrality Part C study notes that, jointly, the local planning authorities in the Sussex North Water Resource Zone (WRZ) propose to deliver nearly 20,000 residential units between them. This development will be supported by additional school places and other associated infrastructure and employment land as part of their emerging Local Plans (Table 6.1).

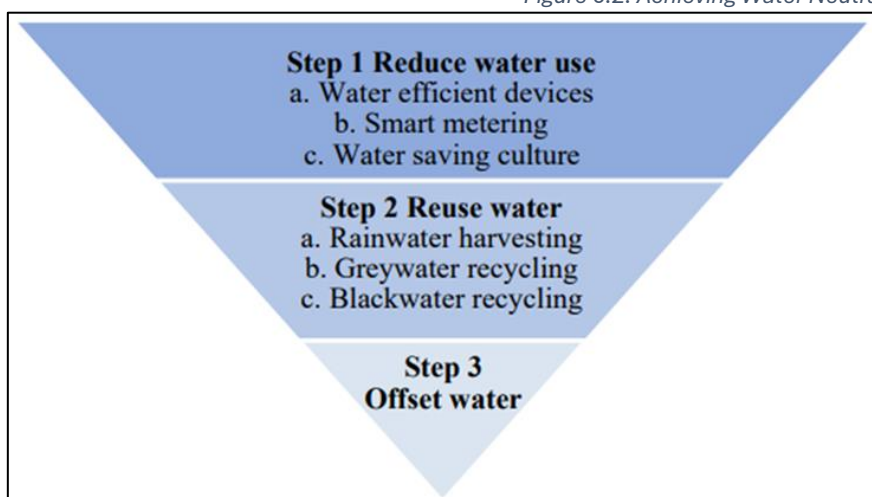
Table 6.1: Houses and employees in current and emerging Local Plans, before water neutrality considerations

LPA	No. houses within current/ proposed Local Plan period (without full planning permission)	Indicative number of employees
Crawley BC	3,960	5,780
Chichester DC	1,796	None identified in Sussex North
Horsham DC	12,800	4,590
SDNP	1,244	345
Total	19,800	10,715

Source: Sussex North Water Neutrality Study: Part C –Strategy, JBA Consulting (November 2022), p.vi

- 6.17 Development in the local plans of each of the affected local authority areas will need to be supported by infrastructure to meet the needs of new communities, and not create additional burdens on existing provision that may also be subject to Water Neutrality requirements. Growth in household population is expected to lead to an increase in the number of school places required, with a resulting increase in water demand, either from new schools, or from an increase in the number of pupils at existing schools. West Sussex County Council estimate the number of new school places required during the plan period and have used this information to inform the Water Neutrality study.
- 6.18 The average water use, and estimated number of new school places were used to calculate a 'water demand from new school places in Sussex North'. This figure was found to be 0.18MI/d by the end of the Water Neutrality Strategy period. Parts A and B of the Water Neutrality Study had already concluded that water neutrality would be possible only through a combination of improved water efficiency measures in new development, offsets to reduce water use in existing locations elsewhere in the WRZ, and possible reduced housing numbers across the wider area. Water efficiency and offsets would work as shown in Figure 6.2.

Figure 6.2: Achieving Water Neutrality (Waterwise 2021)



- 6.19 The first requirement is to maximise the water efficiency of new development in order to reduce water consumption as far as possible. This is important as the greater the water efficiency (i.e. the less water used) in new development, the less offsetting that is needed overall to reach water neutrality. Tighter water efficiency in new development can be achieved through a combination of water efficient fittings (for example: low flow showers; tap aerators); flow regulators which reduce the flow of water into a property; and rainwater harvesting or greywater recycling.
- 6.20 The second requirement is to offset any remaining use, generally through retrofit measures elsewhere which reduce water consumption from existing development or agriculture within the Water Resource Zone.
- 6.21 Part B of the Water Neutrality Study considered a range of possible water efficiency targets for residential development (all in litres per person per day, l/p/d):
- Building Regulations Standard: 125l/p/d;
 - Building Regulations Optional Standard: 110l/p/d;
 - Target 100: 100l/p/d;
 - Realistic Achievable: 85l/p/d; and
 - Ambitious: 62l/p/d.
- 6.22 Part C of the Water Neutrality Study took forward two of these targets to consider in more detail as part of the Strategy:

- 110 l/p/d ('Building Regulations optional'): The current standard in the Local Plans of the affected local authorities. This has been found sound at examinations, reflecting the fact that the Sussex North WRZ is already in an area of water stress.
- 85 l/p/d ('Realistically achievable'): The Part C report considered the justification of this more ambitious target, including its achievability, costs and impacts in relation to water neutrality. Non-household development was considered alongside the residential element: it was recommended that it should achieve a score of three credits within the water (Wat 01 Water Consumption) issue category for the BREEAM New Construction Standard, achieving a 40% reduction compared to baseline standards.

- 6.23 The standard Building Regulations requirement of 125 l/p/d was not considered reasonable, given that existing plan requirements are already more stringent. Having no water efficiency target, thereby relying on water neutrality studies for individual planning decisions, was also considered unreasonable for the same reasons.
- 6.24 An alternative of 100 l/p/d average over the entire area (reflecting Southern Water's "Target 100") was considered. However, it was felt to not offer a significant improvement over the current 110 l/p/d standard set out in the adopted Local Plan.
- 6.25 Finally, an option of 62 l/p/d was considered. This would be achievable where markets in water resources and water services result in widespread competition and local providers delivering integrated services. It would include extensive use of rainwater harvesting and greywater recycling as well as some smart devices. However, it was judged to be too stringent to be realistically deliverable.
- 6.26 The evidence set out in the Water Neutrality Study Part C indicates that a water efficiency policy target either of 85 l/p/d or 110 l/p/d would be reasonable to consider. It recommends that 85 l/p/d is adopted, because this is a figure supported as achievable by the Energy Savings Trust and Ofwat respectively (further details are found in Appendix C of the Part C Study). This more ambitious target would greatly reduce the need for offsetting measures to achieve water neutrality, and has been found to not unduly impact on viability (as shown in the Crawley Local Plan Viability Study Update, DixonSearle, January 2023). Its application to all developments (and not, for example, only to the large sites) is judged necessary due to the need for full water neutrality across all areas of the borough that fall within the Sussex North Water Resource Zone.

Water Demand and the Water Resources Management Plan

- 6.27 Table 6.2 shows the additional water demand by the end of the Local Plan period under the two reasonable alternatives of 110 l/p/d and 85 l/p/d, assuming the development levels shown at Table 6.1.

Table 6.2: Total water demand under two water efficiency targets, assuming development levels of Table 6.1

Water efficiency target	Total water demand during Local Plan period (to 2038/39) (ML/d)¹⁴
Building Regs. optional (110 l/p/d)	5.916
Realistic achievable (85 l/p/d)	4.943

Source: Sussex North Water Neutrality Study: Part C –Strategy, JBA Consulting (November 2022), p.vii

- 6.28 Water companies must produce a Water Resource Management Plan (WRMP) which defines how they will maintain a balance of water supply to water demand. Part of the current Southern Water WRMP (WRMP19) is a programme aimed at reducing water demand on the network

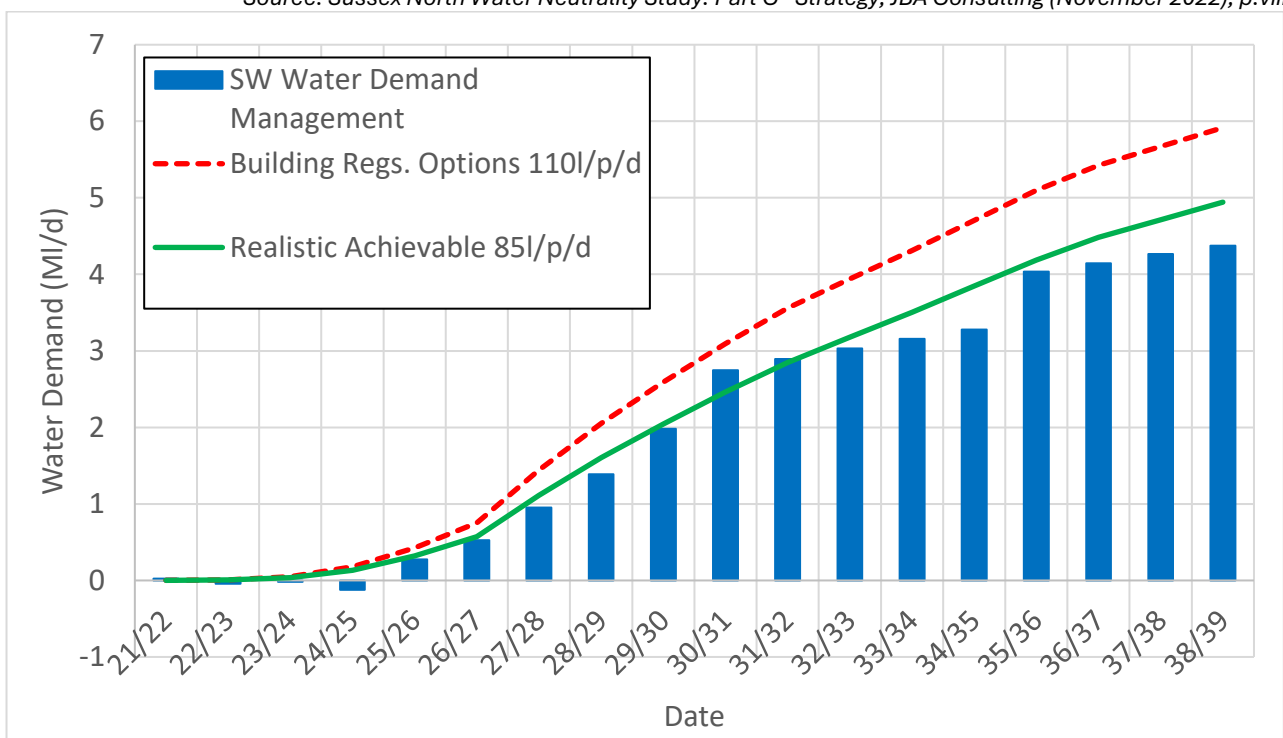
¹⁴ A megalitre (ML) is 1 million litres or 1,000 cubic metres. By way of comparison, an Olympic swimming pool contains 2.5ML of water

through a reduction in household per capita consumption and a reduction in leakage. This will effectively offset most, but not all, of the growth proposed within the emerging Local Plans.

Demand for Water and the Scale of Development

6.29 Figure 6.3 shows the predicted water demand from new development under 110 l/p/d and 85 l/p/d arising from combined local plan growth. The bars represent the contribution from Southern Water’s water demand reduction and offsetting activities that are factored into their current WRMP (including a 10% safety margin), after sites with extant planning permission on or before September 2021 have been taken into account. Where there is a gap between the lines and the bars, additional offsetting is required to make the anticipated local plan growth in that year water neutral, with the maximum gap being the total amount of offsetting required to make the plan water neutral overall.

Figure 6.3: Water demand under alternatives of 110 l/p/d and 85 l/p/d arising from combined local plan growth
Source: Sussex North Water Neutrality Study: Part C –Strategy, JBA Consulting (November 2022), p.viii



6.30 If the 110 l/p/d target were maintained, and employment growth is delivered, 6,345 new dwellings could be built in the Sussex North (WRZ) up to 2030 whilst achieving water neutrality, without a need for further offsetting beyond what is planned in WRMP19. This number would not increase abstraction at Pulborough (after Southern Water’s contribution to demand reduction and offsetting). This figure increases to 8,335 new dwellings (again assuming for Southern Water’s demand reduction contribution) if the more ambitious target of 85 l/p/d were adopted. A decay factor to reflect water use possibly increasing over time (for instance because residents decide to change the fittings in their house to less water-efficient fittings) has been included in the calculations. Tables 6.3 and 6.4 provide the year-by-year breakdown of how much housing growth can be theoretically delivered across the water resource zone, on the basis of what the WRMP19 can achieve (and without any additional offsetting that would need to be led by local authorities). This still leaves a significant amount to offset, if the growth identified in Local Plans is to be delivered in full, necessitating further offsetting beyond those measure identified by Southern Water.

Table 6.3: Water demand by year in 110 l/p/d scenario 2021 to 2039 (Sussex North Water Neutrality Study: Part C - Strategy, JBA Consulting (November 2022))

Year	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39
Water demand 110l/p/d (Ml/d)	0	0.01	0.04	0.17	0.33	0.59	1.22	1.74	2.23	2.69	3.15	3.54	3.89	4.27	4.65	4.98	5.26	5.54
SW Contribution (Ml/d)	0.18	0.38	0.65	0.73	1.21	1.52	1.97	2.41	3	3.77	3.91	4.05	4.18	4.3	5.06	5.17	5.28	5.39
SW Contribution (minus full extant planning) (Ml/d)	0	-0.1	-0.1	-0.21	0.14	0.39	0.78	1.22	1.82	2.58	2.73	2.87	2.99	3.11	3.87	3.98	4.1	4.21
Capacity for Local Plan growth (Dwellings)	0	0	0	0	530	937	1454	1659	2236	2901	578	543	513	477	2916	447	492	456
Capacity for Local Plan growth with employment growth delivered (Dwellings)	0	0	0	0	224	780	1256	1471	2052	2718	394	368	344	306	2743	281	328	293

Table 6.4: Water demand by year in 85 l/p/d scenario 2021 to 2039 (Sussex North Water Neutrality Study: Part C - Strategy, JBA Consulting (November 2022))

Year	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39
Water demand 85l/p/d (Ml/d)	0	0	0.03	0.13	0.25	0.45	0.94	1.35	1.75	2.13	2.52	2.84	3.15	3.47	3.81	4.1	4.36	4.61
SW Contribution (Ml/d)	0.18	0.38	0.65	0.73	1.21	1.52	1.97	2.41	3	3.77	3.91	4.05	4.18	4.3	5.06	5.17	5.28	5.39
SW Contribution (minus full extant planning) (Ml/d)	0	-0.1	-0.1	-0.21	0.14	0.39	0.78	1.22	1.82	2.58	2.73	2.87	2.99	3.11	3.87	3.98	4.1	4.21
Capacity for Local Plan growth (Dwellings)	0	0	0	0	695	1214	1907	2126	2838	3677	660	586	538	483	3639	418	479	427
Capacity for Local Plan growth with employment growth delivered (Dwellings)	0	0	0	0	442	1080	1719	1951	2668	3510	491	429	387	329	3483	271	335	286

Offsetting water demand

- 6.31 Offsetting must be in place before the water demand is generated, for instance before new houses are occupied. If it is not possible to provide sufficient offsetting, because it cannot be delivered fast enough, or there is not enough available offsetting to meet demand, this will restrict the amount of growth that can go ahead.
- 6.32 As explained above, a deficit exists between the WRMP19 offsetting package and the total demand for new water supply from new local plan growth. A key feature of the Part C brief was to advise on a mitigation package to address this gap, to sit within the remit of local plans, which is deliverable, achievable and effective. A number of potential offsetting measures were assessed while defining this Strategy. This led to a proposed local authority-led 'offsetting scheme' (SNOWS), which would further offset new water supply over and above the offsetting included as part of the WRMP. The recommendations for an offsetting scheme in Part C of the Water Neutrality Study are:
- Flow regulators in existing properties – installing a device to reduce the volume of water used in existing properties. This device has been used in a trial by Crawley Homes in 2022, and in trials by Affinity Water elsewhere in the country.
 - Water efficiency in schools – consisting of water audits, retrofitting water efficient devices, and where practical installing rainwater harvesting. Schools in West Sussex are already under the national average in water consumption and options for reducing this further are limited.
 - Non-household rainwater harvesting (RwH) – commercial buildings offer a large potential for RwH due to their extensive roof areas. In a non-household setting, RwH can be used to meet the demand from toilet flushing, as well as other uses such as vehicle washing.
 - Golf course irrigation – The British and International Golf Greenkeepers Association carried out a survey in 2019 and reported that just under 50% of golf facilities rely on mains potable water supply for irrigation. Assuming these figures are reflective of the golf courses within

Sussex North, there is large potential for saving water if an alternative source of water for irrigation could be found. Other recreational uses such as sports grounds, swimming pools and leisure centres should also be investigated.

- 6.33 The SNOWS offsetting scheme forms part of the implementation of local plans, but does not itself form planning policy. It is not therefore necessary to appraise alternative approaches.

Appraising the Reasonable Alternatives

- 6.34 Table 6.5 shows the reasonable water efficiency alternatives for consideration and the interlinkage of water efficiency target, development levels and offsetting. The Water Neutrality Study Part C provides detailed technical and other evidence which explains why these two options have been investigated, and others ruled out as not being reasonable alternatives.

Table 6.5: Reasonable alternatives for water neutrality

Water efficiency level	Summary Reason for Consideration
110 l/p/d	This is the 'optional' Building Regulations Approved Document Part G standard. It is the standard required in currently adopted local plans within the Sussex North Water Resource Zone. It is less expensive to implement, but would require significantly greater levels of water supply offsetting required over local plan periods (which there is finite scope to achieve) compared with the alternative (85 l/p/d), and may therefore result in significantly less housing being delivered. More broadly, the 110l/p/d standard is recognised as a standard required where there is serious water stress, but this level of water efficiency does not provide sufficient benefits to address the ongoing water neutrality situation in Sussex North.
85 l/p/d	This more ambitious standard is recommended for local plan adoption in the Water Neutrality Study Part C. It is supported by research into feasibility, costs and local market research. It is more expensive to implement, but has been found to be viable, and is considered realistically achievable. It would require significantly lower levels of water supply offsetting required over local plan periods compared with the alternative (110 l/p/d), and may, therefore, result in significantly more housing being delivered.

- 6.35 Appendix G: Policy SDC4 Table shows the sustainability appraisal of the two reasonable alternatives for water neutrality, which relate to water efficiency. Each Local Authority within the Water Resource Zone has committed to appraise these two options using their SA Framework and the methodology is consistent.
- 6.36 The preferred alternative, jointly agreed by all the authorities in the Sussex North WRZ, is a water efficiency level of 85 l/p/d for residential developments, or achieve a score of 3 credits within the water (WAT01 Water Consumption) issue category for the BREEAM Standard for non-residential developments. Both options would achieve water neutrality and help to protect the area's biodiversity and sites of international nature conservation importance. However, the preferred alternative is the more socially beneficial alternative, as it allows a greater number of homes to be built. It is economically viable for developers and future house buyers, and would require less expensive offsetting. It would have no significant negative impacts on the sustainability objectives.
- 6.37 The Statement of Common Ground confirms that these appraisal findings apply jointly to all the local authorities in the Sussex North WRZ, and all of the authorities agree that the preferred alternative is Option 2: 85 l/p/d for residential developments or achieve a score of 3 credits within the water (WAT01 Water Consumption) issue category for the BREEAM Standard for non-residential developments. The appraisal shows that there is a need for the process to be managed in order to ensure the certainty of achieving water neutrality is achieved. This will require the preparation of the Implementation Scheme alongside ongoing monitoring.

7.0 SUBMISSION POLICY AND ALLOCATIONS / DESIGNATIONS APPRAISAL

Submission Local Plan Policy Appraisal Summary

- 7.1 Each Local Plan Policy and 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 7.1.
- 7.2 Each Policy was assessed against the separate Sustainability Objectives (set out in Table 4.3), 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 (--)

- 7.3 Detailed commentary is provided in Appendix F to explain the reasons behind the assessment in each case.
- 7.4 This analysis has shown that whilst in the majority of cases the chosen policy has a positive or no impact on the sustainability objectives, there remains a need to consider mitigation to minimise or neutralise the outstanding potential negative impacts. In addition, it was determined that in some cases the chosen option would not represent the most sustainable approach but was selected since more sustainable alternative options would not necessarily comply with national planning legalisation (including the NPPF), or where selection of that option might result in development viability or delivery concerns. Therefore, the submission Local Plan policies chosen are believed to be the most sustainable having assessed reasonable and realistic alternatives.

Summary of Key Findings and Significant Effects

- 7.5 Following the assessment of each policy, the results were tabulated, which meant that it was possible to identify complementary policies and where there were areas of conflict. The main findings from this Sustainability Appraisal are as follows:
- The assessment of the Local Plan policies generally found that the 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 in the borough.
 - The policies protecting the character, design, heritage and environment of the borough work harmoniously to protect both the built and natural environment of the borough and its setting. These policies also have a positive effect on ensuring healthy, active, cohesive and socially sustainable communities and encouraging active lifestyles. However, the combined effect of these policies limits the overall amount of land which is available for development.
 - Key housing and employment sites and main employment areas have been identified within the Local Plan to meet as much of the development needs of 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. For example, levels of crime or decisions of private companies to locate within the town are only partly based on planning policies within the Local Plan.
- The majority of the policies have combined to have an overall positive impact for the economy.

7.6 Once the individual and joint impacts of policies within the Local Plan had been assessed, the most significant impacts were identified. In general, the most significant negative effects relate to the impact on the countryside setting and environmental designations, increased infrastructure need and the effects of traffic, including those arising as a consequence of Gatwick Airport.

7.7 Beneficial impacts include an increase in the number of affordable homes, new employment floorspace, and the maintenance and improvement of the character of Crawley, which retains its neighbourhood principle approach.

Table 7.1: Local Plan Policies Sustainability Appraisal Overview

Local Plan Policy	SA Objective								
	1	2	3	4	5	6	7	8	9
SD1	++	++	++	+	+	++	++	++	++
SD2	+	0	0	0	0	+	+	+	+
CL1	+	+	++	++	+	+	++	++	++
CL2	++	++	++	++	+	++	++	+	++
CL3	++	++	+	++	+	+	++	++	++
CL4	++	++	/	++	+	?	++	+	+
CL5	++	++	++	++	+	++	++	+	+
CL6	+	++	++	+	+	++	+	+	++
CL7	+	0	++	+	0	++	0	0	+
CL8	+	/	++	/	/	+	+	/	+
CL9	/	/	+	/	/	++	/	+	+
DD1	++	++	+	+	/	+	+	+	+
DD2	0	0	+	++	+	0	+	/	++
DD3	++	+	0	++	0	0	+	0	+
DD4	++	++	++	/	/	++	+	/	+
DD5	0	0	++	+	+	0	0	0	++
DD6	0	0	++	0	+	++	0	0	+
DD7	?	-	?	0	0	+	-	0	0
HA1	0	?	++	0	/	0	0	0	+
HA2	0	?	+	0	/	0	0	0	+
HA3	0	?	++	0	0	+	0	0	+
HA4	0	?	+	0	/	0	0	0	+
HA5	0	?	++	0	/	0	0	0	+
HA6	0	0	++	0	/	+	0	0	+
HA7	0	+	+	0	/	+	0	0	+
OS1	+	+	+	+	+	++	+	+	++
OS2	+	++	+	0	/	+	+	++	++
OS3	+	0	+	0	0	+	++	+	++
IN1	+	+	0	+	+	+	+	++	+
IN2	+	+	/	0	+	+	+	+	+
IN3	+	+	+	+	+	+	+	++	+
EC1	?	?	+	+	++	+	+	+	++
EC2	+	+	+	+	++	+	+	+	++
EC3	+	+	++	0	++	0	+	+	+
EC4	?	+	+	+	++	-	+	+	+
EC5	+	+	+	+	++	0	+	0	+

Local Plan Policy	SA Objective								
	1	2	3	4	5	6	7	8	9
EC6	+	?	+	0	++	0	0	0	+
EC7	+	+	+	0	+	0	++	0	0
EC8	0	0	0	0	+	0	??	0	0
EC9	0	0	0	0	++	0	0	0	+
EC10	0	0	+	0	+	0	0	0	+
EC11	0	0	++	++	++	0	?	?	+
EC12	+	+	++	?	+	0	++	++	++
EC13	+	0	+	0	+	-	0	+	0
GAT1	-?	?	0	0	++	??	??	??	0
GAT2	??	??	??	??	++	-?	??	+	??
GAT3	-	-	0	0	/	-?	-	/	0
GAT4	0	0	0	0	+	0	+	0	0
TC1	0	0	??	+	++	0	++	+	++
TC2	+	??	+	+	+	0	+	++	++
TC3	+	+	++	++	++	0	++	+	++
TC4	??	??	++	0	0	0	0	0	++
TC5	++	+	++	0	++	0	++	+	+
H1	/	/	/	-?	-?	/	/	/	/
H2	0	+	+	+	0	+	+	+	++
H3	0	??	++	+	0	++	0	?	++
H3a	+	+	++	++	0	/	0	0	++
H3b	0	/	++	+	0	++	0	0	+
H3c	0	/	++	+	++	0	++	/	++
H3d	0	0	++	++	0	0	++	++	+
H3e	++	0	+	++	++	0	+	0	++
H3f	0	+	+	+	0	++	0	++	++
H4	0	0	0	+	0	0	0	0	+
H5	0	0	0	++	++	0	0	0	++
H6	0	0	0	++	++	0	0	0	++
H7	+	+	+	++	+	0	0	0	+
H8	0	0	?	+	0	-	0	0	+
H9	0	0	0	+	0	0	0	0	+
GI1	++	++	++	0	0	++	++	++	++
GI2	++	+	+	/	/	++	/	/	+
GI3	++	++	++	/	/	++	0	+	+
GI4	+	??	0	0	0	++	0	++	++
SDC1	++	++	??	++	++	??	0	0	++
SDC2	++	0	0	+	+	0	0	+	??
SDC3	+	++	0	+	0	++	0	0	+
SDC4	++	++	0	-	-	++	0	0	+
EP1	0	++	++	?	?	++	0	+	+
EP2	/	+	0	0	0	+	0	+	+
EP3	++	++	++	+	0	+	0	0	++
EP4	0	0	0	++	+	0	0	0	++
EP5	++	++	0	0	0	++	0	0	++
EP6	++	++	++	+	0	+	0	0	++
ST1	+	+	+	??	+	??	++	+	+
ST2	+	/	+	+	+	??	++	++	+
ST3	+	??	+	0	??	0	++	+	??
ST4	-	-	/	+	+	-	-	++	-

The Mitigation of Policies with Negative Effects

7.8 In order to minimise any negative effects of the chosen Local Plan policies, 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, when considered as a whole, have the potential to counteract the negative impacts of policies on a particular Sustainability Objective.
- 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.
- In particular, environmental impacts can be mitigated against at the planning application stage, either through in-depth ecological reports and/or an Environmental Impact Assessment (EIA). Planning conditions will also play a role in ensuring that potential negative effects of development are resolved.

Submission Local Plan Site Allocation/Designation Appraisal Methodology

7.9 The Sustainability Appraisal Objectives provide the basis for the site allocation/designation appraisal. From this, individual criteria questions and topics have been identified. These topics and criteria have been used to assess the various site options for the Local Plan and how they could contribute towards 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.

7.10 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 more detailed assessment work may be necessary for the detailed design of allocations for planning permission (where applicable).

Sustainability Objective	Key Topics for Site Allocations	Sample 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	Is the construction of the site going to meet high standards of energy efficiency? Is the need to travel reduced through the location of the site? Are developments of significant scale designed to high or moderate density, to create efficiencies in the use of resources, including energy supply, services and transportation. And specifically in regard to public transport, are such developments taking advantage of existing or providing for the expansion or connection to frequent and reliable options? Does the layout of pathways for new development encourage walking and cycling? 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?

Sustainability Objective	Key Topics for Site Allocations	Sample Assessment Criteria
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	Are site proposals located away from areas that are high risk flooding zones, now or in the future? Are flood mitigation or resilience measures incorporated into new development proposals? Is the site subject to water neutrality, and if so, has water neutrality been demonstrated?
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	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? Have major development proposals demonstrated and documented how the positive and valued components of existing, wider area, rural/urban structure have guided and directed the form of new development. Are proposals designed so that they respect, protect, build upon and enhance the positive aspects of existing character, significance and distinctiveness of both the site and wider area?
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	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? Has new development identified, tested and (where appropriate) embraced opportunities for increased density?
5. To maintain, support and promote a diverse employment base that can serve the local and sub-regional and regional economy.	Economic Development	Would the development proposal assist in maintaining, supporting or enhancing the local economy of the area? Would the development support the delivery of business land and/or floorspace? Would the development support delivery of other forms of employment? Would the development support the vitality and viability of Crawley Town Centre?

Sustainability Objective	Key Topics for Site Allocations	Sample Assessment Criteria
<p>6. To conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough.</p>	<p>Protection of Environmental Designations; Conservation and Enhancement of Biodiversity Habitats</p>	<p>Would the development proposal impact upon an existing or future environmental designation (such as a SAC/SPA/Ramsar Site, SSSI, Local Wildlife Site or the National Landscape)? 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? Will the development achieve water neutrality? Have major proposals demonstrated and documented how the positive and valued components of existing, wider area, rural/urban structure have guided and directed the form of new development? Are proposals designed so that they respect, protect, build upon and enhance the positive aspects of existing character, significance and distinctiveness of both the site and wider area?</p>
<p>7. To reduce car journeys and promote sustainable and alternative methods of transport, whilst ensuring sufficient transport infrastructure is delivered to meet the requirements of the borough.</p>	<p>Sustainable Transport: Highways/Rail Cycling/Pedestrian</p>	<p>Would the development increase highway and/or rail usage and would this have a detrimental impact upon highway and/or rail congestion? 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? Has new development identified, tested and (where appropriate) embraced opportunities for increased density so as to achieve a minimum of 60 dwellings per hectare (i.e. that considered necessary to sustain a dependable, frequent and high-capacity public transport service)? Are new significant scale proposals located beside existing or providing appropriate levels of accessibility to enhanced public transport services? Is the site close to both the pedestrian and/or cycling network? Does the layout of pathways for new development to encourage walking and cycling?</p>

Sustainability Objective	Key Topics for Site Allocations	Sample Assessment Criteria
8. To ensure the provision of sufficient infrastructure to meet the requirements of the borough.	Infrastructure Provision; Water/Sewerage Facilities; Telecommunications; Energy Provision	<p>What is the capacity of the site to ensure that sewage can be adequately treated?</p> <p>Would the development site be designed to be connected to high quality telecommunication systems?</p> <p>Is the site likely to provide additional renewable energy provision as part of the new development?</p> <p>Is the site close to existing gas/electricity/ water mains? Is there sufficient capacity of current local physical connections?</p> <p>Is a contribution required to fund or part-fund the delivery/improvement or expansion of sustainable transport infrastructure?</p>
9. To promote active, cohesive and socially sustainable communities and To ensure everyone has the opportunity to participate in sport and to encourage active, healthy and independent lifestyles.	Community Facilities; Neighbourhood Centres; Reuse of Previously Developed Land; Health Facilities; Education Facilities; Leisure Facilities	<p>Are sites located reasonably close to neighbourhood centres and/or community centres? Are the sites located within the Built-Up Area Boundary (BUAB)?</p> <p>Is the site allocation re-using previously developed land?</p> <p>Is the site likely to put people before traffic and encourage walking and cycling by establishing a layout of pathways and have 'secured by design' principles implemented within the development design?</p> <p>Is the site located in close proximity to existing leisure and recreation facilities?</p> <p>Is the site located in close proximity to existing health facilities?</p> <p>Is the site located in close proximity to existing local schools?</p> <p>Will amenity areas be provided in association with the site?</p> <p>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?</p> <p>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?</p>

Assessment of Site Allocations/Designations

7.11 Each known potential Local Plan housing allocation, Town Centre Key Opportunity Site, strategic employment allocation, Main Employment Area designation and 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 was identified and ascribed either a positive, negative neutral or uncertain impact and colour coded in accordance with the criteria set out in paragraph 7.2 above.

7.12 A more detailed commentary is provided in Appendix G to assist in explaining the reasons for ascribing the impacts in each case and gives an overall conclusion on the site's suitability. A consistent approach, and the same criteria, was used in the SA/SEA 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.

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 runs from the 1 April to the 31 March each year.

Area Action Plan (AAP)

An optional development plan document. An AAP provides specific planning policy and guidance for a particular location or an area of significant change.

Built-up Area Boundaries

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

Community Infrastructure Levy

CIL regulations allow Local Authorities to develop a schedule to charge all new development for contributions to infrastructure requirements created by the development. Crawley Borough Council adopted a CIL Charging Schedule in 2016.

Greenfield Land

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

Local Development Scheme (LDS)

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

Local Plan

The Local Plan is a single document incorporating strategic planning, and development management policies. Crawley's existing Local Plan was adopted in 2015 and is currently under Review.

National Landscape

A national landscape designation which aims to conserve and enhance the natural beauty of the landscape. Previously known as Area of Outstanding Natural Beauty (AONB).

National Planning Policy Framework

National planning policy is provided in a single National Planning Policy Framework (NPPF). This was originally published in 2012, and was revised in 2018 and 2019, with the version published before the Local Plan Submission in 2021. This is the version the Local Plan Review is considered to be in conformity with. Subsequent revisions have been published since the submission of the Local Plan for its examination, in September and December 2023.

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 Practice Guidance

Planning guidance is published by central government on the internet and is updated regularly. This supports the policies set out in the NPPF.

Previously Developed Land (PDL)

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

Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA)

The purpose of sustainability appraisal is to appraise the social, environmental and economic effects of the strategies and policies in a Local Development Document from the outset of the preparation process. The results of the SA/SEA process are used as a decision making tool. The acronym refers to the requirements under the Planning and Compulsory Purchase Act 2004 to carry out both a Sustainability Appraisal and a Strategic Environmental Assessment, which due to their similarities can be combined.

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 the council 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.

Water Neutrality

Development within a given area is 'water neutral' where it results in no net increase in water use within the region in question. For the purposes of the Local Plan water neutrality is applied at the level of the Sussex North Water Resource Zone (WRZ), meaning that for every new development, total water use in the WRZ after the development must be equal to or less than the total water-use in the region before the new development.

APPENDIX A: ENGAGEMENT PARTNERS

Crawley Borough Council partners:

Planning Development Management
Sustainability Team
Economic Regeneration
Environmental Health
Community Services
Housing

Statutory consultees:

Natural England
Environment Agency
Historic England
National Highways
NHS Sussex/CCG
Neighbouring Authorities (Horsham, Mid Sussex, Mole Valley, Reigate & Banstead, and Tandridge Councils, South Downs National Park Authority)
West Sussex County Council
Surrey County Council

West Sussex County Council:

Strategic Planning Policy
Transport and infrastructure
Education
Minerals and Waste
Public Health

Minority Forums:

Older People
Ethnic Minorities
Disabled People
Young Mothers
Youth Council

Neighbourhood Forums

Schools

Cycle Forum

The Town Access Group

Local Nature Partnership

Homes England

Gatwick Airport Limited

Infrastructure Providers

**APPENDIX B: SUMMARY OF SCOPING AND EARLY DRAFT REPORT
CONSULTATION RESPONSES (July – September 2019)**

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SUSTAINABILITY APPRAISAL/STRATEGIC ENVIRONMENTAL ASSESSMENT				
Representor/ Representation Reference	Organisation	Policy/ Para/ Page No.	Comments	CBC Response
REP162/565	Sussex Ornithological Society	Topic Area E	<p>Topic Area E – Natural Environment.</p> <p>26. Section 2 states that “...the National Pollinator Strategy 2014 and West Sussex’s Pollination Action Plan 2019-2022 are current national and county plans that are encouraging a movement towards a net gain in biodiversity and natural capital.” Whilst these are welcome initiatives, to suggest that they will achieve a net gain in biodiversity is wrong for the reasons outlined in 16 above. Yes they should achieve a gain but Crawley needs to do far more to more than offset the harmful biodiversity impacts of their Local Plan development proposals so that an overall net gain is achieved. The word “net” therefore needs to be deleted.</p> <p>27. Crawley has a particularly rich amount of protected and open green spaces, including 12 LWS’s, 6 Local Nature Reserves, ancient woodland, parks and recreation areas and a Green Infrastructure network. Much of this is owned/ controlled directly by the Borough Council, (including the Nature Reserves). Tilgate Park is a particularly large area.</p> <p>It is therefore disappointing to see that as part of the Local Plan/ Sustainability Appraisal there appears to be no stock take of the current biodiversity quality of these areas and no plans to ensure that the biodiversity value of these areas is maintained or even improved (to contribute towards meeting the NPPF requirement to deliver a net gain in biodiversity). This appears to be a major omission.</p> <p>28. Table 4.3 suggests a worthwhile objective under item 6, namely to “Conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough”. However the examples of indicators are, to put it mildly, unimpressive. The only quantifiable measure proposed is “Amount of trees with tree preservation orders lost annually”</p> <p>And section E2 (page 59) shows that there has been a net loss of trees with TPO’s over the three years reported, so this is currently going the wrong way. (And there appear to be no plans being put forward to change this).</p>	<p>Net has been removed with an additional line added: “the mechanisms for ensuring this gain occurs are still being implemented as there are a variety of smaller interventions and design mechanisms that could contribute to creating a net gain standard.”</p> <p>An additional indicator has been added that will provide measurable results for trees and soft landscaping in the future.</p> <p>Though working across the authority areas of nature that are in need of improvement are identified.</p> <p>LWS in Crawley which are owned by the Council have a management plan detailing necessary treatment and care needed for that natural area to improve the quality of biodiversity in Crawley. The advice is welcome in confirming that the management plans can be more efficient using SMART goals.</p> <p>Hectares and percentages of land in Crawley of designated habitats (ancient woodland, deciduous woodland etc. have been included in Topic E of the Sustainability Appraisal.</p>

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			<p>29. We believe that much more work needs to be done on the environment and biodiversity elements of the Sustainability Appraisal, with a particular focus on improving the quality of biodiversity in Crawley’s numerous green spaces so as to make this a major contribution to delivering a net gain in biodiversity. It is hard to see how the Crawley Local Plan can hope to offer any net gain in biodiversity without its open spaces contributing towards this. There are very many losses of biodiversity that are going to occur because of the development plans that are being put forward in the Local Plan, and these need to be more than offset.</p> <p>30. Therefore, positive plans to improve biodiversity in Crawley’s green spaces need to be developed, measured and reported on, and monitoring needs to be much more comprehensive than proposed in this document. As a minimum we would hope to see an inventory of the current biodiversity quality of key Borough-owned LWS’s and Local Nature Reserves, listing key species including Section 41 Species. These need to be supported by Management Plans with clear and measurable goals that will deliver net gains in biodiversity.</p>	
REP169/589	Judith Ashton Associates on behalf of A2Dominion Homes Ltd.		<p>In addition to the above, we have to say we are concerned that the Sustainability Appraisal/Strategic Environmental Assessment Scoping Report and Draft Report has not actually demonstrated that all reasonable alternatives have been assessed when considering the environmental effects of the Plan.</p> <p>The appraisal of the housing policy on p135 – 138 suggests 4 options were considered:</p> <p>Option 1: Housing requirement based on the Government’s standard method for calculating housing need, including the cap (476 dwellings p.a.) – see p136</p> <p>Option 2: Affordable housing needs locally determined housing requirement (minimum of 527 dwellings per annum). These figures to be revised with data from updated SHMA.</p>	The precise supply-led figure has been revised following the Reg. 18 consultation and call for sites, and there may be potential for this to change as the examination proceeds. The policy is clear that the figure is a minimum and that options will be explored to increase delivery. In the meantime it is considered reasonable to consider the merits in principle of adopting a supply-led requirement, as assessed in Options 4 and 5 regarding Policy H1 (in the updated SA).

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			<p>Option 3: ‘Supply-led’ locally determined housing requirement (minimum of 320 dwellings p.a. over period 2020-2035, stepped as a 451 requirement over years 1-5 and 255 in years 6-15).</p> <p>Option 4: ‘Supply-led’ locally determined housing requirement (minimum of 320 dwellings p.a. over period 2020-2035, stepped as a 451 requirement over years 1-5 and 255 in years 6-15) with ‘unmet need’ expressed.</p> <p>The SA goes on to state that option 4 was chosen as <i>‘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 2035, as informed by the council’s urban capacity, open space, economic growth and transport modelling work. Mitigation of negative impact on SA Objective 4 (Opportunity to live in a decent and affordable home) is provided by establishing the amount of unmet need arising from the borough within the policy and identifying the scope of work required by the council to ensure this need is met within sustainable and accessible locations suitable for residents of Crawley. 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.’</i></p> <p>In the first instance option 1 is not the standard method figure of 752 dwellings referred to in the Reg 18 Plan so the implications of not meeting the standard method figure have not been explored in the SA. Secondly in adopting a supply led figure when, we would suggest, the full extent of the supply has yet to be quantified given both our comments above and the fact a new call for sites is in progress, suggests a preconceived approach to what the borough can achieve, rather than a positive approach to site selection and plan making, so is proceeding contrary to the advice in the NPPF.</p>	<p>The SA assessment in relation to Policy H1 has been reviewed and now 5 options are considered, including the option of meeting the 752d.p.a requirement in full, as suggested, as well as the option of adopting a (much) higher requirement of 1848d.p.a. for the purpose of meeting the borough’s identified affordable housing need (assuming an affordable housing requirement of 40%).</p>

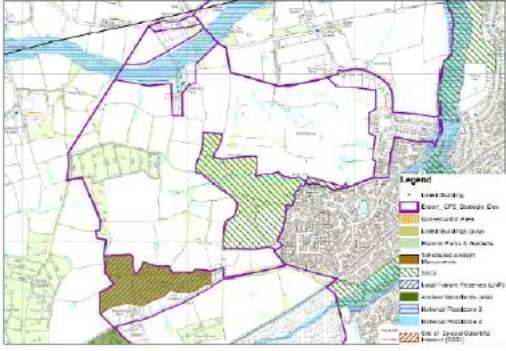
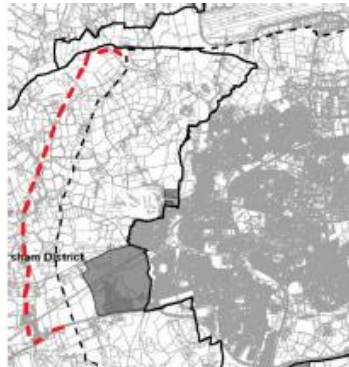
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			The SA should assess all reasonable alternatives, including the implications of complying with the housing requirement in full – only then can its implications be truly considered. Which given one of the sustainability objectives of the Reg 18 Plan (as set out at appendix a) is: <i>'To ensure that everyone has the opportunity to live in a decent and affordable home'</i> would suggest that the SA is not, in reviewing its reasonable alternatives, actually looking at an option that meets the sustainability objectives of the plan – which cannot be right.	
REP184/733	Sussex Wildlife Trust		Sustainability Appraisal SWT encourages CBC to ensure that the parameters that it intends to use to assess the impacts of the plan are effective in what they are trying to measure. We suggest they look at the effectiveness of these measures in relation to the last iteration of the Local Plan and Sustainability Appraisal to consider whether the sustainability predictions the previous SA came to fruition in terms of impacts on the sustainability objectives. With a clear focus on the need for planning to deliver net gains to biodiversity, CBC need to ensure they have a sufficient evidence base in place and effective monitoring of targets to demonstrate how this net gain has been achieved.	Concerns regarding the effectiveness of measuring the value of the natural environment within the Sustainability Appraisal are noted. New indicators have been added to help monitoring of various habitat designations.
REP185/748	Carter Jonas on behalf of Homes England		CRAWLEY BOROUGH COUNCIL LOCAL PLAN REVIEW 2020-2035 - SUSTAINABILITY APPRAISAL SCOPING REPORT (JULY 2019) On behalf of our client, Homes England, please find enclosed representations to Crawley Borough Council's Local Plan Review 2020 – 2035 (Regulation 18) Sustainability Appraisal Scoping Report (hereafter referred to as "CBCLPR SASR"). Homes England is an executive non-departmental public body, sponsored by the Ministry of Housing, Communities and Local Government (MHCLG). Homes England is the government's housing accelerator. Homes England has the appetite, influence, expertise and resources to drive positive market change. By releasing more land to developers who want to make a difference, we're making possible the new homes England needs, helping to improve neighbourhoods and grow communities. Homes England works in collaboration with partners who share our ambition. These include local authorities, private developers, housing	

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			<p>associations, lenders and infrastructure providers. Within the next few years, Homes England will have invested over £27 billion across our programmes.</p> <p>Homes England mission is to intervene in the market to ensure more homes are built in areas of greatest need, to improve affordability. Homes England will make this sustainable by creating a more resilient and diverse housing market.</p> <p>Homes England has experience in acting as a ‘master developer’ on schemes such as the Northern Arc in Burgess Hill. In the case of Burgess Hill, we acquired the site, which has been identified as a location for major housing delivery for over 10 years but had stalled due to the complexities of land ownership and the need for upfront strategic infrastructure delivery. Homes England worked closely with Mid Sussex District Council, the landowners and the site promoter to acquire the land. At the Northern Arc, we are investing in the required infrastructure to release the first phases of development early.</p> <p>At West of Ifield, we will take a similar approach as the master developer to accelerate the delivery of key infrastructure to enable housing to be built out quickly.</p> <p>Furthermore, acting as a master developer will enable Homes England maintain the highest design standards across the scheme from outset to completion as well as delivering significant social, economic and environmental benefits to the existing neighbourhoods of Crawley.</p> <p>These representations relate to the promotion of Rowley Farm for employment uses and of which a Call for Sites submission has also been made by Homes England under</p> <p>separate cover, and also to specific policies and proposals in the CBCLPR including the safeguarding of land for the expansion of Gatwick Airport (GAT2), the safeguarding of</p> <p>the proposed Crawley Western Relief Road (‘CWRR’) (ST4) and those policies that relate to urban extensions and which are relevant to the proposed development of land west of Ifield.</p>	

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			<p>Each representation is set out under a separate heading below and reflects the tests of soundness set out in the NPPF (paragraph 35) that plans should be positively prepared, justified, effective and consistent with national policy.</p> <p>Reliance on At Crawley 2009 study Homes England considers that the use and reliance on the ‘At Crawley 2009 Study’ does not reflect the best practise guidance set out in the NPPF at paragraph 31 which states, ‘the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.’ (our emphasis) The Study is currently 9 years old and hence cannot be considered to be up to date.</p> <p>As the Local Plan will be in place until 2035 and given the strategic importance of some of the infrastructure required, an up to date evidence base must be in place to ensure the Plan reflects the tests of soundness set out in the NPPF (paragraph 35), ie, be positively prepared, justified, effective and consistent with national policy. This approach will then accord with the Planning Practice Guidance (Paragraph: 001 Reference ID: 61-001-20190315), where it states, <i>‘it is essential that plans are in place and kept up to date’</i>. If the Council proposes to rely on the recommendations of a document that examines the potential for strategic development both within and beyond Crawley’s boundary, Homes England considers that is essential that it is updated to inform the revised spatial development strategy.</p> <p>The introduction to the document states: <i>“The Study develops a previous iteration of the At Crawley Study prepared by Atkins in 2005. Building on this previous work, it takes a fresh look at the potential for strategic development at Crawley ... it provides a consistent assessment of the suitability, availability and achievability of strategic development locations ... it considers what infrastructure would be necessary to support strategic development ... the Study is intended to ensure that future strategic</i></p>	<p>There is no reliance on the At Crawley Study, and the “At Crawley” Study boundary has been removed from Fig 2.1 in the SA (and Fig 2 in the Local Plan). Paragraph 2.14 of the SA explains that the focus of the Local Plan will be upon Crawley Borough, but that growth to meet Crawley’s unmet needs may take place in neighbouring authorities, and that the SA/SEA for these developments would be the responsibility of the relevant Planning Authority.</p>

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			<p><i>development at Crawley is highly sustainable, properly planned and supported by timely provision of adequate infrastructure. It aims to ensure that future strategic development is of a high quality and supports the town as a whole.” (paragraphs 1.3-1.5) A two tier assessment was undertaken. The first stage involved the identification of key sustainability constraints to development where planning approval for development within a viable timescale would be at higher risk. The defined Tier 1 constraints (Figure 3.1) were considered most significant given the relative sensitivity associated with these areas and their legal status. These included location in the 60dBa noise contour of Gatwick Airport, location in Flood Zones 2 and 3 as identified in the SFRA, location within an SSSI, SAC*, SPA*, National Nature Reserve* or RAMSAR* (* not actually present in the Study Area) and location within an AONB. The assessment of Tier 1 constraints and patterns of landownership and options informed the identification of potential options. Each of the options identified was considered to provide potential to accommodate either residential-led development with capacity to accommodate c.2,500 dwellings and associated uses as a sustainable urban extension in accordance with the neighbourhood principle – or, particularly where not suitable for residential development, to accommodate strategic employment.</i></p> <p><i>The second stage of assessment evaluated the options against a wide range of sustainability criteria. Each option was ranked positive, neutral or negative against each sustainability objective. The resulting assessment considers the potential for strategic development of 11 locations, one of which was an area of land west of Ifield.</i></p> <p><i>The extent of this area is identified on the Plan below – Site F:</i></p>	

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			 <p>The assessment concludes at paragraph 9.77 that “the site can thus be regarded as a suitable location for a new neighbourhood.”</p> <p>The SASR relies upon the 2009 study to define the area for search and review of locations for development, and to indicate areas likely to be impacted by development (paragraph 2.15).</p> <p>Homes England considers that the opportunity should be taken to update the study and to appraise a larger area. The existing area is shown on Figure 2.1 in the study and this is provided below, on which Homes England has identified in red the boundary of the larger area that it considers should be studied:</p> 	

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			The Council has acknowledged that the extent of the area should be kept under review and updated, as appropriate. As the Council is just starting the formal consultation process, Homes England considers that it is appropriate now to enlarge the extent of the area to be surveyed.	
REP185/749	Carter Jonas on behalf of Homes England		Strategic Policy LC5: Development Outside the Built-Up Area The preferred option (1) selected seeks to develop local policy to maintain Crawley’s compact nature and attractive setting whilst conserving and enhancing the countryside. In light of Homes England’s comments on the evidence base, the detail of the policy is likely to be unsound because it is not based on up to date consideration of the potential for development on the west side of Crawley.	The SA/SEA for potential development on the west side of Crawley is the responsibility of the relevant Planning Authority.
REP185/750	Carter Jonas on behalf of Homes England		Policy CD5: Local Design Standards Homes England agrees to the decision to choose Option 2. However, in its representations on the draft Local Plan, Homes England expressed support for the use of Area Wide Character and Design Assessments for all substantial new development, and has suggested that these should not be the responsibility of the Council but should be prepared by the developer. This because the Council does not have the resources to undertake these assessments and could lead to delay development from coming forward.	Crawley Borough Council will be bringing a programme forward, over time, of Area Wide Character and Design Assessments. However, developers support in their delivery is welcomed in appropriate circumstances.
REP185/751	Carter Jonas on behalf of Homes England		Strategic Policy GAT2: Safeguarded Land The decision to safeguard land is noted and it is correct that Option 2 has been rejected. The Council’s justification is that “ <i>the Aviation green paper advises that it would be prudent to safeguard land, where there is robust evidence.</i> ” Homes England does not consider there is robust evidence to safeguard the extent of land proposed in light of GAL having confirmed (29th August 2019) the process is now underway for the submission of a development consent order (DCO) seeking permission to bring its northern runway alongside the main runway by the mid-2020s. We therefore consider the extent of land reserved could be excessive because the use of the emergency runway will provide for the airport’s growth. As such, Policy GAT2 is not sound because it relies on out of date evidence and does not take into account less land may be	Policy GAT2, safeguarding, has now been deleted from the Local Plan as the council does not consider there is sufficient evidence, at this time, to safeguard this extent of land for a future southern runway at Gatwick Airport. The area previously safeguarded is included within an area designated for the preparation of an Area Action Plan, after the adoption of the Local Plan. This will give the opportunity for the future growth needs of the airport to be considered

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			<p>required given the work is now progressing with regards the DCO application.</p> <p>Homes England has proposed that Gatwick Airport should provide up to date evidence of how much land might be required so that the Local Plan will be informed by up to date evidence.</p> <p>It is also consider that the use of out of date evidence stymies suitably located sites being developed which would assist the Council in meeting its employment targets and also, achieving the priorities of The Coast to Capital Strategic Economic Plan.</p>	<p>alongside other development and infrastructure needs, as well as environmental protection requirements. The AAP will be the subject of its own SA/SEA.</p>
REP185/752	Carter Jonas on behalf of Homes England		<p>Strategic Policy H1: Housing Provision</p> <p>Noting the borough's challenges to accommodate development within its administrative boundary, Homes England considers the decision to choose Option 4 to be sound, provided the Council works positively and collaboratively with neighbouring authorities to meet Crawley's unmet housing needs.</p>	Support noted.
REP185/753	Carter Jonas on behalf of Homes England		<p>Strategic Policy H3g: Urban Extensions</p> <p>Homes England considers the decision to choose Option 1 and use a typology for any urban extensions to Crawley is robust, provided a number of changes are made to the policy which are contained with separate submissions made to the Council. These relate to criteria i., ii., iv., x., and xii. of the policy.</p>	Support for an Urban Extensions policy noted. Responses to the suggested changes to the policy are covered in the Local Plan Consultation Statement.
REP185/754	Carter Jonas on behalf of Homes England		<p>Strategic Policy GI2: Biodiversity and Net Gain</p> <p>Whilst Homes England supports the decision to choose Option 1 and had proposed that a specific requirement to achieve a 10% net gain for biodiversity should be included in the policy. This requirement will be included as part of the Environmental Bill which will be introduced later this year and to ensure the policy is up to date and relevant upon adoption, Homes England suggest the first paragraph should include this requirement.</p>	This has been noted in GI2 and in the Sustainability Appraisal Topic Area E – Natural Environment. Recognition of at least a 10% new gain per new development has been included in the sustainability appraisal and policy GI2.
REP185/755	Carter Jonas on behalf of Homes England		<p>Strategic Policy GI4: Local Green Space</p> <p>Homes England considers the selection of Option 1 is not sound. It proposes that Green Belt policy tests be used to protect Local Green Space and this approach does not accord with the guidance in the NPPF. Homes England has proposed revisions to this policy.</p>	Disagree – GI4 is an adopted policy. Ifield Brook Meadows and Rusper Road Playing Fields is a very special area for Crawley, designated as such due to its particular qualities in terms of nature,

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				heritage, recreation, landscape, tranquillity and access to the wider countryside. Local green space is a particular designation, and whilst GB policies apply, it doesn't negate the opportunity for local policy to reflect the particular reasons why the specific site is valuable.
REP185/756	Carter Jonas on behalf of Homes England		<p>Policy ST3: Improving Rail Stations</p> <p>Homes England considers the spatial development strategy that focuses development around stations to be sound, but considers that the policy should be amended to read <i>“at Ifield Station, strengthen its role as a suburban station meeting the needs of current and future residents in the west of the town;”</i>.</p> <p>Linked to this, Homes England notes the reasoned justification at paragraph F8 (page 64) that <i>“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.”</i></p>	Policy and supporting text amended.
REP185/757	Carter Jonas on behalf of Homes England		<p>Policy ST4: Safeguarding of a Search Corridor for a Crawley Western Relief Road</p> <p>Homes England considers the decision to choose Option 4 to be sound and has submitted representations to the draft Local Plan that the extent of land shown to be safeguarded is too extensive. However, Homes England considers that a clear case is made for the removal of the eastern section between the A23 London Road and Gatwick Road given the specification of the A23 dual carriageway already in place. Not only would this approach reduce the environmental effects of the new road but it would allow for the logical extension of Manor Royal and add to the employment land pipeline – a key priority of the Council.</p>	The eastern section of the Search Corridor has been deleted. The corridor is included and referenced in the Area Action Plan policy.
REP196811	Environment Agency		<p>SEA Scoping Report Draft</p> <p>The recognition of flooding as a specific issue that benefits from the inclusion within the Local Plan is noted, and welcomed. Policy that strengthened the requirements for all development to ensure that flood</p>	Support noted. Updated SFRA and Water Cycle Study is underway.

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			<p>risk from all sources is managed for the lifetime of a development should be in place.</p> <p>Reference to updating the SFRA and Water Cycle Study (A14) is noted. These documents are important in understanding and clearly setting out flood risk and water management aspects and should be reflective of the most up to date information available.</p> <p>Due to the nature and extent of the flood risk within Crawley Borough, choosing to include a locally specific flood risk management policy under EP1 does seem a prudent way forward. The choice of Option 1 for EP2 would also offer a more appropriate policy direction for this type of development proposal.</p>	
REP196/814	Environment Agency		<p><i>Sustainability Appraisal/Strategic Environmental Assessment Scoping Report and Draft Report</i></p> <p>Para A3 refs - "Thames Water Draft Water Resources Management Plan 2019 (Thames Water, 2019)" - The latest document is the "Revised draft Water Resources Management Plan 2019", dated October 2018</p> <p>Para A3 refs - "Southern Water, Water Resources Management Plan 2015-2040 (Southern Water, 2015)" - The latest document is the "Revised draft Water Resources Management Plan 2019, Addendum to Statement of Response", dated June 2018. Has this been considered?</p> <p>Para A3 refs - No reference to SES Water's plan. The latest document is "Revised Draft Water Resources Management Plan 2019", dated September 2018.</p> <p>Para A3 refs - No reference to South East Water's plan. The latest document is "Revised Water Resources Management Plan 2020 to 2080".</p> <p>Para A17 - "significant water stress" - our own terminology is "serious" water stress. This paragraph refers to "the Plan period to 2030". That presumably was the limit of the old water cycle study.</p> <p>Para A18 "Water Supply Management Plans" – capitals</p> <p>Para A19 table for indicator A8 - The 2017/18 figures quoted here have very recently been superseded by 2018-19 data. Per capita</p>	<p>Documents updated and added in paragraph A3. Updated SFRA and Water Cycle Study will assess latest evidence in Resource Management Plans.</p> <p>Amendment made.</p>

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			<p>consumption in 2018-19 was higher owing to the hot weather. "The Regional Economic Strategy target is 135 litres per day by 2016" - was? Reference could also be made here to aspirations in water company plans, especially Southern Water's "Target 100".</p> <p>Para F2 refs - "Draft Water Resources Management Plan 2019 (Thames Water, 2018), Draft Water Resources Management Plan 2019 (South East Water, 2018), Draft Water Resources Management Plan 2019 (Sutton and East Surrey Water, 2018), Water Resources Management Plan for 2015-40 (Southern Water, 2014)" - see Para A3 refs above.</p>	<p>Amendment made.</p> <p>Amendment made.</p> <p>Amendments made.</p>
REP196/818	Environment Agency		<p>Sustainability Appraisal / SEA (Scoping Report & Draft Report)</p> <p>Page 13 - Water is mentioned in section A, climate change, but not in section E, the natural environment. Any growing urban area will place additional stress on the natural environment, including the aquatic environment, so this should have been highlighted in section E of the Sustainability Appraisal.</p> <p>Page 14 and Page 16 refer to water supply, sewerage and pollution. <i>"The potential for development to be concentrated in the Crawley area may lead to water supply issues"; "The potential for development to be concentrated in Crawley may lead to sewerage capacity problems"; and "Crawley's role as an economic hub and transport interchange means the town's contribution to air, land, water and noise pollution is likely to increase".</i></p> <p>Page 62 – <i>"A thorough consideration of the strategic infrastructure network is to be undertaken to ensure that development does not outstrip essential infrastructure, such as sewerage and water".</i></p> <p><i>The two sections above, Pages 14-16, and Page 62, together demonstrate the need for these issues to be adequately addressed in the Local Plan. The link between water supply and water quality (which is directly related to sewerage provision) has not been adequately addressed in the Local Plan.</i></p> <p>Page 21, A16 – <i>"There is a risk that potential new strategic development and increased population, combined with the level of economic</i></p>	<p>Waterways has been included in topic area E, as has reference to the fact that any growing urban area will place additional stress on the natural environment, including the aquatic environment.</p> <p>A Water Cycle study is currently being commissioned and is due to be completed February/March 2020. The Environment Agency have already been involved in this process.</p>

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			<p><i>development, could exacerbate water supply issues and associated water quality and infrastructure capacity issues. Therefore, an updated Water Cycle Study will be commissioned to investigate how best the issue of water stress can be addressed”.</i></p> <p><i>Page 32, A20 – “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, an updated Water Cycle Study will be undertaken”.</i></p> <p><i>A16 and A20 demonstrate the need for a new Water Cycle Study. The Local Plan should give a clear commitment when this will be completed as this will help address many of the water related issues.</i></p> <p><i>Page 163, Policy SDC3: Tackling Water Stress: “Development of a local plan policy to mitigate the impact of development on the water environment. 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.</i></p> <p><i>Policy SDC3 highlights the importance of a section dedicated to water in the local plan.</i></p>	Support for water stress policy noted.

**APPENDIX C: SUMMARY OF INITIAL PUBLICATION CONSULTATION
RESPONSES (January – March 2020)**

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REP/021	Gladman Developments LTD	SA/SEA Sustainability Appraisal/ Strategic Environmental Assessment	<p>In accordance with Section 19 of the Planning and Compulsory Purchase Act 2004, policies set out in Local Plans must be subject to a Sustainability Appraisal (SA), and also incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA regulations).</p> <p>The SA/SEA is a systematic process that should be undertaken at each stage of the Plan’s preparation, assessing the effects of the emerging Local Plan proposals on sustainable development when judged against all reasonable alternatives. The Council should ensure that the future results of the SA clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of this assessment why some policy options have progressed, and others have been rejected. This must be undertaken through a comparative and equal assessment of each reasonable alternative, in the same level of detail for both chosen and rejected alternatives. The Council’s decision-making and scoring should be robust, justified and transparent.</p>
REP/022	Sussex Ornithological Society	SA/SEA Sustainability Appraisal/ Strategic Environmental Assessment	<p>The SOS recognises that England needs new houses and we are not challenging the assumptions behind the numbers needed, as that is not our expertise.</p> <p>However, we do feel well qualified to speak out when we can see that proposals are being put forward that would result in houses being built in areas that are of particular importance to birds of conservation importance, as that would harm them.</p> <p>In this respect our issue with the Crawley Local Plan 2020-2035 is not where it is intended to build 5355 houses within the Crawley Borough Council boundary in the plan period (although we do have concerns about one of these proposals, see 20(b) below) but the assumptions that lead to the conclusion that 5925 houses cannot be built in Crawley, but will have to be built by neighbouring Local Authorities under the Duty to Cooperate obligations – and Crawley’s assumptions that these dwellings must be built as an urban extension adjacent to Crawley’s boundaries.</p> <p>Why is there a fundamental assumption that Crawley will not fulfil their housing supply target by building new homes at a high enough density so as to enable all 11,280 to be built within their boundary? Put simply if the average new home in this Local Plan is going to be two and a half stories high so that only 47 % of them can be built in Crawley, then if they were five stories high all 11,280 dwellings could be built in Crawley instead. And the taller you build some dwellings the lower the residual dwellings would need to be.</p> <p>No attempt appears to have been made to consider building at sufficiently high densities to achieve this – instead the assumption appears to be that it is essential that the current character of Crawley is maintained without considering what the implications of that assumption on the proposed overflow areas are. In other words the impact on the characteristics of adjoining local authorities does not appear to have been considered.</p> <p>We strongly object to the assumptions that most of the 5925 overflow dwellings must be built as an urban extension of Crawley Borough – i.e. on land adjacent to Crawley - as that assumption will have a very serious impact on scarce</p>

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			<p>birds of conservation concern, as well as wider adverse biodiversity impacts if any of this overflow is built on the High Weald AONB</p> <p>The inference of the 5925 overflow is that Crawley is full and that there will never be space within its boundaries to ever again build any more dwellings. It would follow from this that future Local Plans will require that all Crawley's future needs for new dwellings will have to be met by adjoining Local Authorities.</p> <p>We simply do not believe that that is a valid scenario. On that basis there would never again be any new development of dwellings in many boroughs and cities across England, yet huge numbers of new dwellings are being built in many boroughs and cities across the UK where the density of population is already far higher than in Crawley.</p> <p>Instead what Crawley appear to envisage is that there will be an ever-increasing expansion of its urban area beyond its current boundaries, absorbing more and more of the West Sussex countryside in Horsham DC, and more and more of the High Weald AONB in Mid Sussex DC.</p> <p>We believe that Crawley must face up now to the need to build new dwellings at a sufficiently high density that it can deliver its future housing needs within its Borough Boundaries, and that it should fundamentally change its planning principles to achieve this. In particular we believe that none of its overflow should be built in the High Weald AONB.</p> <p>The High Weald AONB along the east side of the M23/A23, immediately adjacent to the boundary of Crawley Borough, is one of the very best areas for woodland birds in all of Sussex, with significant numbers of Section 41, Schedule 1 and red-listed species of high conservation concern recorded using this area in the last 10 years. For this reason SOS objects to any proposals by Crawley to destroy parts of the AONB by insisting that overflow dwellings are built on it, and that urban Crawley extends into it. Appendix 1 gives details of bird species of conservation concern that are found in this area.</p> <p>Crawley's proposals for urban extensions into Mid Sussex DC suggest that it is acceptable for the character of part of the High Weald AONB to be substantially destroyed in order to accommodate Crawley's overflow. We do not accept that part of the High Weald AONB should be destroyed just because Crawley do not wish to consider building homes at a higher density. What is the justification for this?</p> <p>Moreover the planning system provides high levels of protection from development to Areas of Outstanding Natural Beauty, alongside National Parks. As the High Weald AONB Management Plan 2019 states (P20, Planning and AONB's)</p> <p><i>The National Planning Policy Framework (NPPF), Paragraph 172, requires that:</i></p> <p><i>“Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in</i></p>

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			<p><i>these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major developments other than in exceptional circumstances.....”</i></p> <p>The southern part of Crawley, south of the A264, lies within the High Weald AONB. Crawley’s Local Plan has not allocated any of this area for development (other than to allocate a reserve site for 10 Gypsy and Traveller pitches, if needed) and (commendably) Crawley appear to be paying particular attention to protecting the part of the AONB that lies within their boundary. Yet they assume it will be OK to plan for a substantial urban extension of circa 1000 dwellings in the Mid Sussex portion of the AONB. The logic of this is not apparent!</p> <p>Moreover, since there is no recognition of the need to change planning principles the implication is that more and more of Crawley will extend into the AONB in future Local Plans.</p> <p>Against this background we would make the following specific comments about the Crawley Local Plan 2020-2035.</p>
			<p>Suggested Modifications: Topic area E – Natural Environment.</p> <p>SOS thanks the Council for their responses, documented in Appendix B, to the comments we made on this topic when we responded to the Regulation 18 Sustainability document. However, we remained concerned that not enough is being contemplated to offset the negative impacts on the Natural Environment of the Crawley Local Plan 2020-35.</p> <p>Crawley has a particularly rich amount of protected and open green spaces, including 12 LWS’s (8 owned by the Council), 6 Local Nature Reserves, ancient woodland, parks and recreation areas and a Green Infrastructure network. Much of this is owned/ controlled directly by the Borough Council. Tilgate Park is a particularly large area.</p> <p>It is therefore disappointing to see that as part of the Local Plan/Sustainability Appraisal there appears to be no stock take of the current biodiversity quality of these areas and no plans to actively manage them in a way that will increase their biodiversity value so as to try and offset some of the negative pressures on their biodiversity that will inevitably come from the densification and growing population (of humans and of pets) in Crawley over the Plan period. It is hard to see how Crawley can hope to deliver a real net gain in biodiversity without such an initiative being put in place. This appears to be a major omission.</p> <p>Table 4.3 suggests a worthwhile objective under item 6, namely to “<i>Conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough</i>”. We welcome the fact that the number of indicators have increased to three but we still think these are inadequate.</p> <p>a) One of three quantifiable measures proposed is “<i>Amount of trees with tree preservation orders lost annually</i>”</p>

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			<p>Data on page 80 of the Sustainability document shows that there had been a net loss of trees with TPO's over the three years reported, so this is currently going the wrong way.</p> <p>b) the two new measures are</p> <ul style="list-style-type: none"> - Number of trees and soft landscaping secured on site or through S106 contributions. This is worthwhile measurement but only if the number of trees lost to development is also measured, so that the net impact can be measured. Moreover mature trees need to be "valued" at a considerably higher rate than newly planted trees. - Hectares/percentage of land in Crawley identified as Local Wildlife Sites. We think this is a worthwhile measure, particularly given the pressure some of these sites are under from developers. <p>We would also suggest that another meaningful measure might be to assess the condition of LWS's every 5 to 10 years, including recording their species inventory, to see how it changes over time.</p> <p>We disagree with the impact assessments in Table 5.1 that the policies in the Local Plan will have no significant negative impact (red coloured) on Sustainability Issue 6 (to conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough). We believe that fauna (including birds) and flora will be significantly affected as open spaces come under pressure, become more crowded and reduce in size. And as outlined in 3 to 15 above, and Appendix 1, the proposal that Mid Sussex should permit development in the AONB bordering Crawley to deal with part of Crawley's overflow will create a very negative impact on birds (and trees). This needs to be factored into Crawley's biodiversity "arithmetic" as it would be a direct consequence of this Plan.</p> <p>We believe that more work needs to be done on the environment and biodiversity elements of the Sustainability Appraisal, with a particular focus on actively trying to improve the quality of biodiversity in Crawley's numerous LWS's, LNR's and green spaces so as to make this a major contribution to delivering a net gain in biodiversity. It is hard to see how the Crawley Local Plan can hope to offer any real net gain in biodiversity without these spaces contributing towards this. There are very many losses of biodiversity that are going to occur because of the development plans that are being put forward in the Local Plan, and these need to be more than offset by getting the most out of the unusually high number of sites of conservation importance in the Borough, many of which are managed by the Council.</p> <p>Therefore, positive plans to improve biodiversity in Crawley's green spaces need to be developed, measured and reported on, and monitoring needs to be more comprehensive than proposed in this document. As a minimum we would hope to see an inventory of the current biodiversity quality of the eight Borough-owned LWS's, listing key species including Section Species and species of conservation concern. These need to be supported by Management Plans with clear and measurable goals that will deliver net gains in biodiversity.</p>

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			<p>Unfortunately time does not permit us to comment on the detailed assessments of the impact on biodiversity, flora and fauna of the policies and housing proposals that are listed in Appendices E and F, but we applaud the detailed assessments that have been made both of the rejected developments as well as the proposed developments...</p> <p>However, as noted in 29 above we believe them to be too optimistic. What does not appear to be being taken into account is the impact of the growth in population in Crawley over the plan period, resulting in greater use of the different types of open areas (both by humans and their pets) with consequence greater disturbance to both flora and fauna. This can be a significant negative influence, especially if the amount of open space is contracting as that will mean even more increases in usage of the residual areas.</p>
REP/044	Tim North & Associates Ltd on behalf of HX Properties Ltd	Sustainability Appraisal/ Strategic Environment Assessment GAT2 Options 1 and 2	<p>Draft Crawley Borough Local Plan Review 2020-2035 – Regulation 19 Consultation</p> <p>My clients, HX Properties Ltd, object to the assessment carried out in the Sustainability Appraisal/Strategic Environmental Assessment (hereinafter referred to as SA/SEA) dated January 2020 accompanying the Regulation 19 Version of the Draft Crawley Borough Local Plan 2020-2035 (hereinafter referred to as the DCBLP), where it relates to Policy GAT2. It is contended that the SA/SEA is deficient, inadequate and unsound where the appraisal concerns Policy GAT2.</p> <p>There is a duty to carry out a legally adequate SA/SEA in order to comply with the EU Strategic Environmental Assessment Directive 2001/42. The SA/SEA must consider Policy GAT2 and “<i>reasonable alternatives</i>” to it, with Article 5 of the Directive setting out the requirement to identify, describe and evaluate the likely significant environment effects of “<i>reasonable alternatives</i>”. These provisions have been transposed into UK law through the Environmental (Assessment of Plans and Programmes) Regulations 2004, Regulation 12 being involved in the preparation of an environmental report.</p> <p>It is contended that additional “<i>reasonable alternatives</i>” to Policy GAT2 exist, which have not been evaluated by the Local Planning Authority, which it is argued represents a fundamental flaw in the soundness of the assessment process. There is no obligation, as far as the law is concerned, to choose the most sustainable option, or the most sustainable of two policy options, since the requirements of the appraisal are entirely procedural [<i>R (on the application of Friends of the Earth) v The Welsh Ministers (2015) EWHC 776 (Admin)</i>]{12} and {75}. Reasons must, however, be given for the rejection of “<i>reasonable alternatives</i>” so that consultees are able to know what those reasons are. (<i>Save Historic Newmarket Community v Forest Heath District Council (2011) EHCW 606</i>).</p> <p>In the case of the Regulation 19 version of the DCBLP, two alternative policy scenarios have been considered: Option 1 being to provide additional car parking within the airport boundary; and Option 2 to allow car parking in other areas. These are precisely the same two policy options that were considered in the SA/SEA dated December 2015, where it relates to equivalent Policy GAT3 in the statutorily adopted Crawley Borough Local Plan 2015-2030.</p>

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			<p>The SA/SEA as part of the statutorily adopted Crawley Borough Local Plan 2015-2030 considered both policy options against ten sustainability objectives. Sustainability objectives 1 to 8 inclusive set out in the SA/SEA dated December 2015 are precisely the same as the sustainability objectives against which Policy GAT2 of the Regulation 19 version of the DCBLP has been assessed.</p> <p>Sustainability objectives 9 and 10 where they relate to the SA/SEA dated December 2015 concerning the adopted Local Plan have been amalgamated to produce one sustainability objective 9 in the SA/SEA Regulation 19 version of the DCBLP. In effect, what were previously sustainability objectives 9 and 10 namely “<i>To promote active cohesive and socially sustainable communities</i>” and “<i>To ensure everyone has the opportunity to participate in sport and to encourage active, healthy and independent lifestyles</i>” respectively, have now been amalgamated into a single sustainability objective 9 where it forms part of the SA/SEA Regulation 19 version of the DCBLP, viz: “<i>To ensure healthy, active, cohesive and socially sustainable communities. To ensure all benefit from a good quality of life, To ensure everyone has the opportunity to participate in sport and to encourage active lifestyles.</i>”</p> <p>It follows that the SA/SEA methodology has not materially changed between that relied upon in the adopted Crawley Borough Local Plan 2015-2030 where it relates to Policy GAT3, and that which forms the basis to the Regulation 19 version of the DCBLP where it concerns the equivalent Policy GAT2. This being the case, and given that the two policy options are virtually identical between the two SA/SEAs; no reasoned justification has been advanced as to why the scores in respect of the two SA/SEAs where they relate to Policies GAT3 and GAT2 respectively, have now changed in the SA/SEA concerning the Regulation 19 version of the DCBLP.</p> <p>In the SA/SEA dated December 2015 relating to the adopted Crawley Borough Local Plan 2015-2030, the two options concerning Policy GAT3 scored identically in respect of all ten sustainability objectives. It is therefore surprising that when the same two options in Policy GAT2 are examined in the context of the SA/SEA relating to the Regulation 19 version of the DCBLP, different scores are recorded, particularly in respect of Policy Option 2.</p> <p>Sustainability objectives 1 and 2 concerned with the need to minimise climate change, and adapt to climate change respectively, both scored a single minus, (i.e. having a negative impact on the sustainability objective) in respect of both options relating to Policy GAT3 in the SA/SEA relating to the adopted Local Plan. The scoring has now been altered in the Regulation 19 version of the DCBLP where it concerns equivalent Policy GAT2. Sustainability objectives 1 and 2 now score a double minus (significant negative impact on the sustainability objective) where it relates to Option 2 of Policy GAT2, i.e. to allow car parking in other areas; with Option 1 retaining a single minus score as was previously the case with the adopted Local Plan.</p> <p>Similarly, sustainability objective 7 concerning the need to promote sustainable journeys, previously scored a single minus in respect of both Options where they relate to Policy GAT3 forming part of the SA/SEA of the adopted</p>

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			<p>Local Plan. There has been a change in the Regulation 19 version of the DCBLP with Option 2 relating to Policy GAT2 in the SA/SEA now recorded as having a double minus score, where it previously scored a single minus.</p> <p>It is alterations of this nature at times when circumstances have not fundamentally changed and the sustainability objectives remain almost identical, which casts doubts on the veracity of the entire SA/SEA process. All other sustainability objectives score identically between the two SA/SEAs where they relate to Policies GAT3 and GAT2.</p>
			<p>Suggested Modifications:</p> <p>There are a number of other objections to the SA/SEA prepared in association with the Regulation 19 version of the DCBLP which need to be recorded, particularly as representations were not raised to the SA/SEA process where it forms part of the statutorily adopted Crawley Borough Local Plan 2015-2030.</p> <p>Firstly, Option 2 is described as “<i>To allow car parking in other areas</i>”, being ill-defined such that it does not amount to a “<i>reasonable alternative</i>”. Long term off-airport car parking can take many different forms, but three generic types can be identified.</p> <p>Passengers can elect to rely on a “<i>meet and greet</i>” company in which they drive their car to the airport only for the “<i>meet and greet</i>” operator to meet the customer at the airport and transfer their car to an off-airport car parking site. This may involve an intermediary step with the car being driven to a holding site prior to it being parked at an off-airport location. The “<i>meet and greet</i>” operator then drives the customer’s car to the airport on their return, enabling the passenger to drive home or to their place of work directly from the airport. A derivation of this form of off-airport car parking is where customers take advantage of a package in which they leave their car at a hotel close to an airport, where their car is often relocated to a long term off-airport car parking site. The car can either be returned to the hotel awaiting the passenger’s return, or alternatively the passenger’s car can be driven to the airport for collection by the customer.</p> <p>This form of off-airport parking is materially different from the traditional “<i>park and ride</i>” long term off-airport car parking facility which involves a site with available reception facilities and compound areas where cars are blocked parked, where a courtesy mini bus or coach transfers the passengers to the airport terminals. The reverse occurs when the passenger returns, when they are picked up by the courtesy bus or coach and transferred back to the long term off-airport car parking facility to collect their car. The mini buses or coaches in such circumstances are normally replaced every three to four years, so there is the added benefit of the means of transportation relied on being the most efficient in terms of carbon emissions. In the case of a traditional long term off airport car parking use comprising Option 2 where it forms part of the SA/SEA to Policy GAT2, to score a double minus (having a significant negative impact on the sustainability objective) is, in these circumstances, disingenuous.</p> <p>Certain passengers prefer to take advantage of technological platforms such as JustPark as part of the sharing economy in which they pay a reduced fee to park their car on the driveway of mostly residential properties in close</p>

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			<p>proximity to the airport, where they can then either walk, take a taxi or minicab, or alternatively obtain a lift to the airport from the owners of the property. The reverse happens when the passenger returns to the airport.</p> <p>Secondly, Option 2 does not state what criteria the appraisal has in mind. It is appreciated that the appraisal is operating at strategic level, but Policy GAT2 in the DCBLP is not a strategic policy in the same way as a policy relating to housing distribution is considered to be strategic policy. On the contrary, Policy GAT2 is addressing a site specific issue, with "<i>reasonable alternatives</i>" required to be assessed on an alternative basis, so as to provide the information set out in Annex I to the Directive. It follows that a statement of the principles to be applied to long term off-airport car parking is necessary in order to assess this option fairly, and on an equivalent basis, as part of an assessment of Policy GAT2.</p> <p>This is required because the principles underlying the various generic forms of long term off-airport car parking affect the sustainability performance of Option 2, with certain categories of long term off airport car parking use being capable of at least being equivalent to, if not more preferable than Option 1.</p> <p>Thirdly, the Council are under an obligation to record any difficulties encountered in compiling the information required by the Directive (Annex I, paragraph (h)). As it has not sought to do so, would imply that it has some criteria or principles in mind, since otherwise it is difficult to see how an appraisal could be carried out without some notion of how Option 2 would operate.</p> <p>In this way, it is considered necessary for the SA/SEA of Policy GAT2 to be redefined where it relates to Option 2, if only to distinguish between "<i>meet and greet</i>" types of long term off-airport car parking, and traditional "<i>park and ride</i>" form of long term off-airport car parking use.</p> <p>These two basic generic forms have an impact on the sustainability objectives of Policy GAT2, in that they possess different characteristics affecting both the numbers and method of movement of passengers to and from the two terminals, with a traditional long term off airport car parking facility being able to take advantage of low emission mini-buses. These two types of long term off airport car parking use have different impacts on congestion and carbon emissions, as well as having an effect on residential property, particularly in cases where dwellings front onto Class A and B highways. It means that reliance placed on distance alone to the terminals is not considered to be the single determining criterion when measuring the sustainability objectives of Policy GAT2.</p> <p>Fourthly, the SA/SEA with respect to Policy GAT2 of the DCBLP records that in providing additional car parking within the airport boundary as part of Option 1, no impact on the sustainability objective of conserving/enhancing biodiversity and landscape is recorded, yet the same sustainability objective is scored with a single minus (negative impact on the sustainability objective) with respect to Option 2.</p>

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			<p>There is simply no justification for this difference in scores given that there are policies within the DCBLP which seek to protect and enhance biodiversity and landscape considerations. In the case of a long term off-airport car park use based on the park and ride model, there is no reason why the scores in respect of sustainability objective 7 should not score equal to, or better than those in Option 1, given that it is in the interests of the owners of the site to manage and maintain landscaping, at the same time paying due regard to biodiversity interests, if only to ensure that a professional image of a well-run operation is portrayed to their customers.</p> <p>Fifthly, a similar situation arises with respect to maintaining and supporting employment which forms the subject of sustainability objective 5. A new long term off-airport parking use is likely to generate between 70 and 100 jobs, so that it is perverse to consider Option 2 as possessing a neutral impact on this sustainability objective, when evaluating a long term of airport car parking use of the traditional model.</p> <p>It follows that there is need for a complete re-evaluation of the SA/SEA of the Regulation 19 version of the DCBLP where it relates to Policy GAT2, with a reappraisal of reasonable alternatives where they relate to Option 2, if the same process is not to be considered unsound.</p>
REP/044	Tim North & Associates Ltd on behalf of HX Properties Ltd	SA/SEA Sustainability Appraisal/ Strategic Environment Assessment EC6	<p>It has been noted that there has been a change of approach on behalf of the Authority, where previously it was contended that parking at hotels and guest houses constituted an ancillary use which did not constitute development requiring planning permission. This becomes evident from the contents of the SA/SEA relating to Policy EC6. In the event that the Council's view on this matter were to have remained unchanged, there would clearly be no need for Policy EC6.</p> <p>It is recognised that the Airport Owner and Operator enjoy permitted development rights in accordance with Schedule 2 Part 8 Class F of the Town & Country Planning (General Permitted Development) (England) Order 2015 (As Amended). However, as your officers will appreciate, the phrase "<i>operational building</i>" is defined in Schedule 2 Part 8 Class O as meaning "<i>a building, other than a hotel required in connection with the movement or maintenance of aircraft, or with the embarking, disembarking, loading, discharge, or transport of passengers, livestock or goods at a relevant airport</i>". In short, hotels do not benefit from permitted development rights, reinforcing the point regarding the need for consistency with both the sequential and demonstrable needs tests in respect of Policy EC6.</p> <p>The reasoned justification in paragraph 9.73 relating to Policy EC6 requires applicants to have regard to Local Plan Policy EC3 and its supporting text when considering hotel development in the Manor Royal Main Employment Area. Policy EC3 is found under the title "<i>Manor Royal</i>", in which it is stated that proposals which are not for B Class development will be permitted if it can be demonstrated that they are of a scale and function that does not undermine the established role and function of Manor Royal. Paragraph 9.44 provides part of the reasoned justification to Policy EC3, setting out complementary business facilities and staff amenities needed to support the day to day needs of Manor Royal businesses and employees.</p>

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			<p>Suggested Modifications:</p> <p>My clients' concerns in this regard is that the contents of paragraph 9.44 do not refer to hotels and visitor accommodation, and neither more importantly does Policy EC4. It follows that there appears to be a conflict between the provisions of Policies EC3 and EC6 where they relate to business supporting facilities on the Main Manor Royal Employment Area, concerning the question of hotel and visitor accommodation proposals.</p> <p>My clients' reservations also extend to the implications arising from the last paragraph of Policy EC6. The reasoned justification in paragraph 9.74 refers to the need to ensure consistency with Local Plan Policy GAT2, but it appears that the implications of this policy have not been fully appreciated.</p> <p>The commentary to Option 3 in the SA/SEA of the Regulation 19 version of the DCBLP concerning Policy EC6 states: <i>"Off airport hotels in sustainable locations such as the town centre can accommodate guests using the airport, without the need for them to drive at all, thereby reducing the need to provide extensive areas of car parking."</i></p> <p>This statement presumes that travellers to town centre hotels will arrive by public transport, but there is no guarantee of that, and to the extent that a passenger wishes to rely on their private cars and stay overnight at a town centre hotel before leaving their car at an on or off-airport parking site, or alternatively rely on a minicab or taxi to ferry them to the airport, cannot constitute a sustainable form of access to London Gatwick Airport. Indeed, it is less sustainable than if a long term off-airport car parking use were permitted in close proximity to London Gatwick Airport.</p> <p>It also does not prevent a hotel in a town centre location from using its car park as a temporary drop off point in connection with a long term off-airport car parking use, where cars would then be moved to an alternative location whether on or off airport, pending the customers' return. This is already taking place in hotels nearer to Gatwick Airport with restricted car parking provision.</p> <p>Either way, and despite the fact a change of use for long term off-airport car parking purposes would be required, the end result would be longer journeys to the airport or relying on mini cabs/taxis ferrying the passengers from the hotel to the airport. Restricting the use of hotel car parks will, in my clients' experience, exacerbate unauthorised long term off-airport car parking which is of no benefit to the Council, the Airport Operator or those wishing to establish lawful long term off-airport car parking uses.</p> <p>Equally, there are important implications in terms of staff resourcing, at a time when until recently, it has been accepted by your Council that unauthorised car parking provides a constituent part of airport related parking supply which is likely to continue.</p> <p>In conclusion, any choice made with respect to the options for Policy EC6 seen from the SA/SEA perspective, requires to consider not only consistency with Policy GAT2, but also the implications for airport related car parking</p>

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			generally from a wider sustainability perspective, and in particular the consequences for those using hotels, as well as on issues of resourcing.
REP/050	Montagu Evans on behalf of Homes England	SA/SEA Sustainability Appraisal/ Strategic Environment Assessment	<p>Homes England acknowledge the updates made to the Regulation Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) since comments made under Regulation 18. We note CBC's Regulation 18 response that notes Paragraph 2.14 of the SA that explains that the focus of the Local Plan is upon Crawley Borough, but that growth to meet Crawley's unmet needs may take place in neighbouring authorities, and that the SA/SEA for these developments would be the responsibility of the relevant Planning Authority. With all comments addressed under re-drafting, Homes England have no further comment and consider the document sound.</p> <p>Please contact me if you would like to discuss any points raised in this submission. In the meantime, I would be grateful if you could continue to keep Homes England informed in relation to the CBC Local Plan and progression towards Examination.</p>
REP/058	Reigate & Banstead borough Council	SA/SEA Sustainability Appraisal/ Strategic Environment Assessment	<p>Strategic Policies</p> <p>We note that from the table on page 10 of the Regulation 19 Crawley Borough Local Plan that adoption is anticipated for December 2020. Paragraph 22 of the revised NPPF advises that "strategic policies should look ahead over a minimum 15-year period from adoption (except in relation to town centre development), to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure". Should the anticipated adoption slightly slip, the strategic policies in the plan will not look ahead over the minimum 15-year period.</p> <p>Draft Sustainability Appraisal/ Strategic Environmental Assessment</p> <p>We note that given that the Regulation 19 Crawley Borough Local Plan is largely a review of the current Crawley Local Plan, CBC have sought largely to only review the previous SA / SEA conclusions, update where changes are proposed, and where new options are proposed consider these.</p> <p>We recognise that the only policy that identified a potential negative impact is GAT2 "Gatwick Airport Related Parking". As stated previously in this response, this policy is in line with Policy TAP2 "Airport Car Parking" in our adopted DMP and we support this approach and consider that it is sound as it reflects the historic and cross-boundary policy position to meet airport car parking needs.</p> <p>More generally we have the following comments:</p> <p><i>Measurability of criteria/ objectives:</i> Whilst we appreciate that this is only a review of the current SA/ SEA, from reading the document there appears to be limited specificity with regards to the criteria and objectives used to assess the options.</p> <p><i>Evidence:</i> It is recognised that a number of evidence studies are still being finalised, the findings of these studies will need to be taken into consideration in an update to the SA/ SEA.</p>

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			<p><i>Paragraph 3.7:</i> Incorrectly states that CBC has a 9.59 year land supply position, the Housing Trajectory produced to accompany the consultation identifies a land supply position of 5.80 years.</p> <p><i>Paragraph A32:</i> We question whether this paragraph should be amended to reflect the fact that as local authorities we work together to measure/ monitor/ mitigate air quality issues.</p> <p><i>Paragraph C11:</i> We note that the mix identified for affordable housing is different to that identified in Paragraph 13.14 of the Regulation 19 Crawley Borough Local Plan.</p> <p><i>Paragraph C11:</i> We note that only 0.5% of 4-bedroom properties have been delivered despite a need for 5%/5-10%. We are currently in the process of preparing a Affordable Housing SPD, as part of this our Housing Services Team suggested that we should require 3-bedroom accommodation to be provided as 3b6p accommodation not 3b5p as some of the need for 4-bedroom properties is due to families with three children not being able to be housed in 3b5p houses.</p> <p><i>Paragraph D5:</i> Recognises that “the allocated Horley Business Park in RBBC will help to meet some of Crawley’s unmet business land needs”, this however isn’t reflected in the economic growth options.</p> <p><i>Policy H5: Affordable Housing:</i> We note that Option 4 “40% affordable housing with no threshold” has been identified as the “chosen option”. Whilst we recognise the need for affordable housing, we note that this is contrary to national policy which states that “the provision of affordable housing should not be sought for residential developments that are not major developments” (Paragraph 63 revised NPPF). Major developments are defined in the revised NPPF as sites “where 10 or more homes will be provided, or the site has an area of 0.5hectares or more”.</p> <p>We note that the options include only the provision of either 30% or 40% affordable housing with/out a threshold. No rationale for these options is provided. The 40% threshold is a continuation of the current Local Plan policy. No testing of a higher percentage requirement/ rationale for not including a higher percentage threshold.</p> <p><i>Policy H1: Housing Provision:</i> It is noted that five options were tested:</p> <ul style="list-style-type: none"> • Option 1: Housing requirement of 1,848dpa based on identified affordable housing need of 739dpa (i.e. total housing required to meet need on basis of 40% affordable housing provision) • Option 2: Housing requirement based on Government’s standard method for calculating housing need, excluding the cap (752dpa) • Option 3: Housing requirement based on Government’s standard method for calculating housing need, including the cap (476dpa) • Option 4: Supply-led locally determined housing requirement (minimum of 357dpa 2020-2035 stepped as a 500dpa requirement years 1-5; 450dpa years 6-10; and 121dpa years 11-15)

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			<ul style="list-style-type: none"> Option 5: Supply-led locally determined housing requirement (minimum of 357dpa 2020-2035 stepped as a 500dpa requirement years 1-5; 450dpa years 6-10; and 121dpa years 11-15) with ‘unmet need’ expressed. and that Option 4 was identified as the “chosen option”. <p>Following our comments on the affordable housing appraisal, we note that no options were considered to deliver the full amount of affordable housing with a different percentage requirement.</p> <p>More generally we note that some of the commentary is quite general/ includes untested statements such as for Option 1 “housing delivery at this level would be well beyond what has been achieved in recent years, suggesting that market factors and the capacity of the construction industry are likely to prevent delivery at this level, which would involve excess provision of market housing ... kit is also a level unlikely to be met or sustained by the housing industry (with annual delivery levels traditionally averaging around a quarter to a third of this)”.</p>
REP/0 61	Historic England	SA/SEA Sustainability Appraisal/ Strategic Environment Assessment	<p>Crawley Local Plan Strategic Environmental Assessment Scoping Report</p> <p>Thank you for your email of 20 January 2020 inviting comments on the Scoping Report for the above strategic environmental assessment.</p> <p>Historic England is a statutory consultation body in relation to the SEA Directive in regard to any matters affecting the historic environment. We are content that the scoping report for Crawley Local Plan adequately covers the issues that may arise in respect of the potential effects of proposed development sites on heritage assets.</p> <p>Historic England has prepared generic guidance with regards to our involvement in the various stages of the local plan process which you may find helpful in preparing the Sustainability Appraisal. This is available to download here: https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/ .</p> <p>This opinion is based on the information provided by you and for the avoidance of doubt does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the plan which is the subject to consultation, and which may, despite the SEA, have adverse effects on the historic environment.</p>
REP/0 62	Environment Agency	SA/SEA Sustainability Appraisal/ Strategic Environment Assessment	<p>SUSTAINABILITY APPRAISAL</p> <p>Water resources and efficiency</p> <p>In the table below para 5.11, "Reduction of Water Consumption" is one of the key topics, but there is no relevant assessment criterion.</p> <p>References on p51 & p86:</p> <p>Thames Water has published a "Revised draft Water Resources Management Plan 2019" and updates to it.</p>

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			<p>Southern Water has published a final "Water Resources Management Plan 2020–70" South East Water has published a final "Water resources management plan 2019"</p> <p>SES Water has published a "FINAL Water Resources Management Plan 2019"</p> <p>Page 206 - Appendix A: Sustainability Objectives – To promote sustainable use of water resources and improving the quality of water bodies should one of the key sustainability objectives. Water resources and water quality are often forgotten because these issues are excluded when listing main objectives.</p> <p>Page 195 - 15.43 <i>The EU Water Framework Directive establishes a framework for the protection of inland surface waters (rivers and lakes), transitional waters (estuaries), coastal waters and groundwater. The government has stated that the environmental protections arising from this and other EU legal instruments will remain in place after the UK leaves the European Union, and the 2018 '25 year Environment Plan' has announced the intention to improve 'at least three quarters of our waters to be close to their natural state as soon as practicable'138. The council supports this work through the proper and sensible management of water in all new development.</i></p> <p>It is encouraging that the council supports protection of the water environment although this needs to be reflected further in the objective SD1 of the draft Local Plan.</p> <p>Suggested Modifications:</p> <p>Flood Risk</p> <p>Due to the flood risk that exists within Crawley and the constraints in terms of available land for future development, ensuring that there is suitable and robust Policy to ensure that flood risk is suitably assessed and managed is essential. The inclusion of specific Policy within the draft Local Plan and the Sustainability Appraisal (SA) in relation to flood risk is noted and welcomed. The SA highlights that without specific local Policy related to flood risk management, National Policy and guidance, as well as Environment Agency advice, would be followed. However, Crawley have recognised that having local Policy would better inform future development proposals in terms of flood risk, especially in the face of climate change. This is welcomed, we are supportive of Crawley's approach in the choice of Option 2 for Policy EP1.</p> <p>In terms of Policy EP2, the choice of Option 1 is also supported. This type of development can have a cumulative impact on flood risk, by providing specific guidance on smaller scale development it also offers those who wish to carry out, for example, householder extensions in flood risk areas, clear guidance on how to approach making an application.</p> <p>We hope you find our comments useful. If you have any queries please do not hesitate to contact me.</p>
REP/068	Sussex Wildlife Trust	SA/SEA Sustainability Appraisal/Strat	SWT encourages CBC to ensure that the parameters that it intends to use to assess the impacts of the plan are effective in what they are trying to measure. We suggest they look at the effectiveness of these measures in relation to the last iteration of the Local Plan and Sustainability Appraisal to consider whether the sustainability predictions

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		egic Environment Assessment	<p>the previous SA came to fruition in terms of impacts on the sustainability objectives. There will be a clear impact on the natural environment from development coupled with a clear focus on the need for planning to deliver net gains to biodiversity. CBC need to ensure they have a sufficient evidence base in place and effective monitoring of targets to demonstrate how this net gain has been achieved. Do CBC think the Sustainability appraisal has gone far enough to address the impacts of development on quality of biodiversity as well as quantity?</p> <p>We hope our recommendations are adopted to ensure that the policies within the Crawley Local Plan are as robust and effective as possible. SWT would be happy to discuss any of the above points with CBC.</p> <p>We do wish to attend the Examination in Public to ensure our views are given due consideration</p>
REP/055	Savills on behalf of Wilky Group	SA/SEA Pages 111 and 296-297	<p>Introduction</p> <p>Background</p> <p>This representation is submitted on behalf of the Wilky Group (TWG or Wilky), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. It relates to the Sustainability Appraisal / Strategic Environmental Assessment (SEA)¹⁵ that provides one of the key documents that support the Draft Crawley Borough Local Plan, 2020 (DCBLP).</p> <p>TWG owns about 63.3 ha (149 acres) of land east of Gatwick Airport and north and south of the M23 spur road between Junctions 9 and 9a. The land south of the M23 spur road is being promoted by TWG as a strategic employment opportunity known as Gatwick Green (the Site). The Site is identified on the plan at Appendix 1, which shows the extent of the Gatwick Green opportunity, comprising about 59 ha (146 acres).</p> <p>Wilky and Aberdeen Standard Investments are discussing how they can work together in respect of Wilky's strategic landholding adjacent to Gatwick Airport to bring forward an integrated mixed-use development and co-ordinated infrastructure solution.</p> <p>Executive Summary</p> <p>TWG has submitted substantive representations on the DCBLP in relation to its land interests east of Gatwick Airport and Balcombe Road to the north of Crawley (59 ha). Its case is primarily concerned with the approach in the DCBLP to safeguarding land for future growth of the airport, the proposal to designate the formerly safeguarded land for the North Crawley AAP and the short and long term approach to identifying land for strategic employment contained in Policies EC1 (Sustainable Economic Growth) and SD3 (North Crawley AAP).</p> <p>TWG considers that there is no legal or national policy basis to safeguard land for a second runway at Gatwick and consequently the unmet planning and socio-economic needs of the Borough can be accommodated through the identification of land. Runway capacity has been provided for at Heathrow to meet forecast demand, alongside the</p>

¹⁵ Sustainability Appraisal / Strategic Environmental Assessment, Draft Report for the Submission Local Plan, Crawley Borough Council, January 2020

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			<p>expansion of other airports based on their existing runway infrastructure. National policy on aviation and airports therefore no longer requires any safeguarding at Gatwick, so TWG fully supports the removal of blanket safeguarding in the DCBLP.</p> <p>The NPPF requires Local planning Authorities to place significant weight on supporting sustainable economic growth by, inter alia, identifying strategic sites for inward investment to accommodate business needs and wider opportunities. Regional and sub-regional economic policy support focusing growth at Crawley/Gatwick in recognition of the area's current role and future potential. Importantly, the evidence base for the Local Industrial Strategy, which planning policy should reflect, supports the identification of major economic development adjacent to Gatwick, identifying land east of the Airport in this regard.</p> <p>TWG supports the policy to identify land for strategic employment and other needs via an AAP for north Crawley, but has put forward evidence that the unmet economic needs of the Borough are higher than noted in policy. In recognition of this and having regard to the removal of blanket safeguarding, evidence has been put forward to support the identification of Gatwick Green for strategic employment to meet the long-standing and urgent unmet needs of the area. Gatwick Green is immediately available to address the short term shortfall of employment land.</p> <p>Sustainability Appraisal / Strategic Environmental Assessment</p> <p>There is a statutory duty under section 19 of the Planning and Compulsory Purchase Act 2004 to carry out a sustainability appraisal of each of the proposals in a Local Plan during its preparation. One of the requirements of the Strategic Environmental Assessment (SEA) Regulations is to include an assessment of any reasonable alternatives, taking into account the objectives and the geographical extent of the plan or programme. The DCBLP SEA contains such as an assessment in relation to the alternative options in relation to safeguarding and Policy SD3 which it replaces.</p> <p>TWG broadly supports the findings of the SEA – however, a review of the SEA in relation to safeguarding and Policy SD3 has identified some further considerations that need to be recorded. Insofar as the SEA does not assess the Gatwick Green strategic employment opportunity, an assessment has been undertaken that shows that the site has a more positive sustainability profile compared with that for the AAP area as a whole.</p> <p>Review of the SEA</p> <p>SEA of the North Crawley AAP (Policy SD3)</p> <p>The SEA contains a sustainability appraisal of the North Crawley AAP area (Policies EC1 and SD3) against nine sustainability assessment criteria. This concludes that the AAP area is assessed as offering possible significant positive impacts against 1 criteria, possible positive impacts against 6 criteria and 1 possible negative impact. The assessment concludes as follows:</p>

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			<p><i>“...land identified for the AAP represents the most sustainable location for strategic employment growth in Crawley. It is a large area of land take, and some areas within the broad identified area will be more sustainable than others – this will be assessed further through the work on the AAP. It would enable highly sustainable, high quality new development to complement and deliver linkages with the existing residential and business communities.”</i></p> <p>The findings of the SEA are supported. However, there is one possible negative impact related to the potential for negative impacts against the criterion to “Conserve/ Enhance Biodiversity and Landscape” – whilst there may be some negative effects from development, it is considered that the need to provide mitigation and/or compensation, especially under the net biodiversity gain policy in the NPPF (and soon to be mandated in the Environment Bill) will ensure that effects relating to this criterion would be neutral to positive.</p> <p>SEA of safeguarded land</p> <p>The SEA contains an assessment of four policy options for safeguarding namely (1) to retain safeguarding, (2) to remove safeguarding but do not designate an AAP, (3) safeguard part of the area, or (4) designate land north of Crawley’s built up area, south and east of Gatwick Airport for an AAP.</p> <p>For option 1 (safeguard land), the Council’s analysis correctly identifies a large number of negatives against the nine assessment criteria, principally from the significant level of socio-economic needs across the Borough that would remain unmet. The Council considered that option 2 (remove safeguarding) would lead to some negatives resulting from the ad hoc approach to allocating land for development in the absence of the comprehensive evidence base to address the scale and spatial distribution of development allocations. The Council considered that option 3 (safeguard part of the area) was untenable in that the needs of the Airport are unknown, so would result in uncertainty over the land available for other land uses.</p> <p>The Council therefore favoured option 4 as it had a number of positives against the nine assessment criteria: it provided for an interim policy arrangement whereby the blanket safeguarding in the adopted CBLP could be removed and replaced by an AAP designation under Policy SD3 that would allow the potential future growth needs of the Airport to be properly considered alongside other development needs in Crawley.</p> <p>The SEA has informed the Council’s decision to remove blanket safeguarding, but defer a final decision on the need for any safeguarding to an AAP. TWG support this approach, but considers the corollary to be some further delay in addressing the unmet needs of the Borough with some negative consequences. The consequences include the continuation of tight restrictions on development in the AAP area with the consequent perpetuation of planning blight and ongoing uncertainty with regard to meeting the Council’s unmet needs. Further, the Inspector for the 2015 CBLP EIP found that the unmet needs of the Borough must be addressed within five years (i.e. by 2020): the departure from this advice is not an ideal outcome in the context of the NPPF requirement to plan positively for</p>

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growth and meet objectively assessed needs. Nevertheless, TWG accepts the findings of the SEA and ultimately agrees with the soundness of the proposed AAP approach.

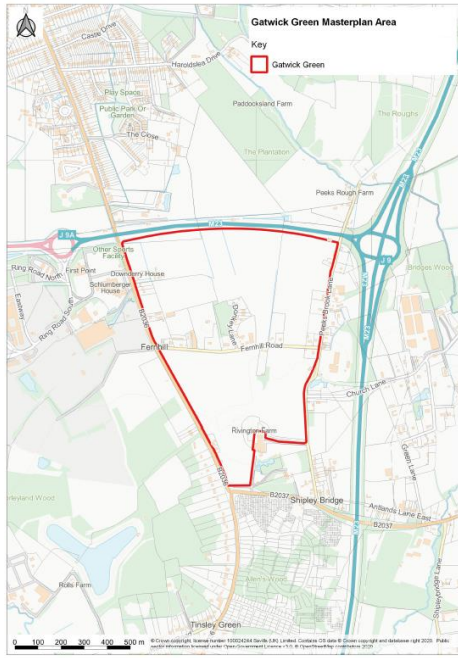
SEA for Gatwick Green

The SEA does not contain a suitability assessment (SA) for the Gatwick Green site because the DCBLP is not identifying sites to meet Crawley’s unmet employment land needs, instead deferring such to the proposed North Crawley AAP.

Savills has therefore undertaken a high-level sustainability assessment of the Gatwick Green site using the same methodology as adopted in the Council’s SEA. The Gatwick Green SA is contained at Appendix 2 to this representation. It demonstrates that the site has a sustainability profile that is more positive than that for the whole AAP area: this provides clear evidence that the Gatwick Green site is a highly accessible location and can be developed in a very sustainable manner consistent with national planning and environmental policy.

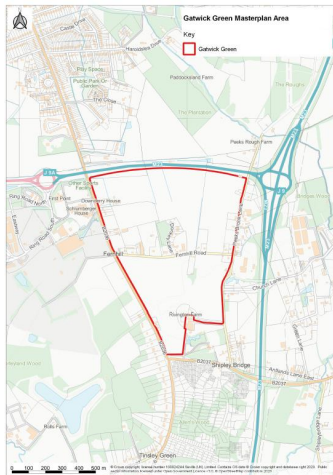
Appendices were sent by email dated 2/3/20.

Appendix 1 Site Plan without TWG land



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			<p>Appendix 2 Land at Gatwick Green</p> <p>Introduction</p> <p>Crawley Borough Council (CBC) is reviewing its adopted Local Plan (Crawley Borough Council Local Plan (CBLP): Crawley 2030, 2015). This Strategic Environmental Assessment (SEA) is undertaken on behalf of the Wilky Group (TWG). It forms part of the evidence base to support representations on the Regulation 19 consultation on the Draft Crawley Borough Local Plan (DCBLP).</p> <p>The DCBLP contains Policy SD3 committing CBC to prepare an Area Action Plan (AAP) covering land that the DCBLP no longer proposes to be safeguarded for a second runway at Gatwick Airport. The purpose of the AAP therefore is to enable the Council to plan for its future economic, housing, infrastructure and community needs, including amongst which are any critical and justified future needs of the Airport. This will be subject to separate consultation and assessment and will include <i>inter alia</i> the consideration of land east of the Airport for strategic employment; a site known as Gatwick Green.</p> <p>The Council has undertaken a Strategic Environmental Assessment (SEA) and a Sustainability Appraisal (SA)¹⁶, respectively under an EU Directive and under regulations of the Planning and Compulsory Purchase Act 2004 to ensure that the environmental effects of the Plan are taken into account and to satisfy independent examination and allow the Plan to be formally adopted. The SEA contained an assessment of a number of proposed site allocations, but did not cover potential sites within the area covered by the AAP under Policy SD3. Instead, the SEA undertook an assessment of the whole AAP area, which adequately provided a baseline assessment to demonstrate the area's broad suitability to accommodate growth and the key considerations that such growth may need to address. In the context of the Wilky Group's ongoing representations seeking the allocation of Gatwick Green for strategic employment in the event that the proposal for an AAP is not adopted, it is appropriate that evidence is presented to demonstrate the suitability of the Gatwick Green site in sustainability and environmental terms.</p> <p>The SEA covers the area of land shown in Figure 1, extending to about 59 ha. This site is largely owned by the TWG (80%): areas in which the TWG do not have an interest are subject to ongoing discussions between TWG and landowners. These discussions have resulted in a number of landowners agreeing to bring their land forward for development in the event the overall site is allocated.</p> <p>The site comprises an area of mixed land uses dominated by low quality pasture mainly grazed by horses and divided into a number of fields by mature hedgerows. Small areas of tree cover occur in the central and north western part of the site. Clusters of residential and some rural-commercial properties occur along Fernhill Road and Donkey Lane, with some frontage development to Balcombe Road and Peeks Brook Lane. The site is bisected</p>

¹⁶ SUSTAINABILITY APPRAISAL / STRATEGIC ENVIRONMENTAL ASSESSMENT DRAFT REPORT For the Submission Local Plan, Crawley BC, January 2020

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			<p>by the Public Safeguarding Zone (PSZ) for the standby runway at Gatwick Airport. Aerodrome safeguarding requirements under CAP 168, the advice note and the Town & Country Planning process by way of ODPM/DfT circular 01/2003 ‘Safeguarding of aerodromes & military explosives storage areas’ Direction 2002 must be adhered to.</p>  <p>This SEA report assesses and identifies the likely environmental effects that are likely to arise from the proposed use of land at Gatwick Green for employment purposes. This process involves drawing on available baseline survey data¹⁷ and identifying the likely positive and adverse effects, and then the broad range of mitigation to reduce the adverse effects. The assessment includes impacts on people’s health and in respect of disability, gender and racial equality.</p> <p>The purpose of this SEA is to assess the sustainability of the Gatwick Green site against the Sustainability Objectives used by Crawley Borough Council (CBC) in the sustainability appraisal and strategic environmental assessment draft Report 2020, which are as follows:</p> <ul style="list-style-type: none"> • To mitigate climate change, by taking actions to reduce the concentration of greenhouse gases in the atmosphere. • 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.

¹⁷ Preliminary environmental/engineering investigations contained in technical reports prepared on behalf of WG and submitted with representations on its behalf on the CLP.

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			<ul style="list-style-type: none"> • 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. • To ensure that everyone has the opportunity to live in a decent and affordable home. • To maintain, support and promote a diverse employment base that can serve the local and sub-regional and regional economy. • To conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough. • 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. • To ensure the provision of sufficient infrastructure to meet the requirements of the borough. • To promote healthy, active, cohesive and socially sustainable communities. To ensure all benefit from a good quality of life. To ensure everyone has the opportunity to participate in sport and to encourage active lifestyles. <p>The methodology for conducting the sustainability assessment evaluated the extent to which Gatwick Green met or could meet the above Sustainability Objectives and then attributed a sustainability rank against each Objective in line with the hierarchy of ranking levels below (Table 1.1) .</p> <p>Table 1.1 – Sustainability rank hierarchy</p> <table border="1" data-bbox="714 804 1429 959"> <tbody> <tr><td style="background-color: #008000;"></td><td>Significant Positive Impact on the sustainability objective (++)</td></tr> <tr><td style="background-color: #90EE90;"></td><td>Positive Impact on the sustainability objective (+)</td></tr> <tr><td style="background-color: #FFFF00;"></td><td>Possible Positive or Slight Positive Impact on the sustainability objective (+?)</td></tr> <tr><td style="background-color: #FFFFFF;"></td><td>No Impact on the sustainability objective (0)</td></tr> <tr><td style="background-color: #FFFFFF;"></td><td>Neutral Impact on the sustainability objective (/)</td></tr> <tr><td style="background-color: #FFFFFF;"></td><td>Uncertain Impact on the sustainability objective (?)</td></tr> <tr><td style="background-color: #FFD700;"></td><td>Possible Negative or Slight Negative Impact on the sustainability objective (-?)</td></tr> <tr><td style="background-color: #FFA500;"></td><td>Negative Impact on the sustainability objective (-)</td></tr> <tr><td style="background-color: #FF0000;"></td><td>Significant Negative Impact on the sustainability objective (--)</td></tr> </tbody> </table> <p>The assessment has drawn on a number of preliminary environmental and engineering investigation reports prepared for the Wilky Group relating to the Gatwick Green site and consideration of the specific proposals for the site contained on the Concept Masterplan for Gatwick Green. The Assessment Criteria were those used in the assessment of site allocations used by CBC in the Sustainability and Strategic Environmental Assessment 2019 (SEA) prepared in support of the DCBLP. The SEA contains the following Assessment Criteria related to each of the nine Sustainably Objectives (Table 1.2):</p>		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 (--)
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Ref. No.	Respondent	Policy/ Para	Comments												
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<p>6. To conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough.</p>	<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?
<p>7. To reduce car journeys and promote sustainable and alternative methods of transport, whilst ensuring sufficient transport infrastructure is delivered to meet the requirements of the borough.</p>	<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?
<p>8. To ensure the provision of sufficient infrastructure to meet the requirements of the borough.</p>	<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?
<p>9. To promote active, cohesive and socially sustainable communities and To ensure everyone has the opportunity to participate in sport and to encourage active, healthy and independent lifestyles.</p>	<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? • 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?

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			<p>Sustainability Assessment</p> <p>Land at Gatwick Green forms part of the land designated as part of the North Crawley Area Action Plan (AAP) area, covered by Policies SD3 and EC1 in the DCBLP. The AAP will address the future socio-economic needs of Crawley and land requirements the related to any planned long term growth of Gatwick Airport.</p> <p>The land subject to the Area Action Plan has been subject to a strategic environmental assessment, contained in the Council’s SEA (pages 296-297), December 2019. In this context, the land at Gatwick Green has already been part of an area-based sustainability assessment, which concluded that the AAP area offered largely positive impacts, but uncertain with regard to climate change and negative in relation to biodiversity and landscape. Table 2.1 below shows the results of the AAP assessment alongside the findings of the Gatwick Green assessment. The results show that Gatwick Green has both less risk of adverse impacts and offers more sustainability benefits compared with the AAP area as a whole. This reinforces the importance of Gatwick Green in meeting the economic needs of Crawley and the Gatwick Diamond/LEP area, but in a highly sustainable manner.</p> <p>Table 2.1 – Sustainability Assessment – AAP area and Gatwick Green</p> <table border="1"> <thead> <tr> <th>Sustainability Objective</th> <th>AAP Assessment</th> <th>Gatwick Green Assessment</th> </tr> </thead> <tbody> <tr> <td>1. To mitigate climate change, by taking actions to reduce the concentration of greenhouse gasses in the atmosphere.</td> <td>Uncertain impact (?)</td> <td>Land at Gatwick Green is located beyond the Built Up Area Boundary. It comprises majority greenfield land with a clusters of commercial properties and groups of residences. This location means economic development would potentially increase the need to travel to access employment opportunities. However, the land is adjacent to existing employment sites served by public transport and is well-located for access by public transport, walking and cycling. The strategic nature and scale of the site provides the opportunity to access the site via an integrated sustainable transport solution. The scale of development would also enable a high level of sustainable design and construction to significantly reduce or avoid climate change impacts. The scale of Gatwick Green combined with its sustainable location adjacent to three Fastway routes offers some more scope to avoid / mitigate climate change than the AAP area as a whole. The impacts would therefore be Possible Positive Impact +?.</td> </tr> <tr> <td>2. 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Sustainability Objective	AAP Assessment	Gatwick Green Assessment
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.	Possible Positive Impact +?	<p>The impact would therefore be Possible Positive Impact +?.</p> <p>There is an identified need for high quality business land and floorspace in Crawley which will likely exceed that which can be provided by sites within the Built Up Area Boundary. Local Plan policies will require high standards of design to be met which respond to their surroundings and protect and enhance culturally valuable areas and buildings. Development on the Gatwick Green site would therefore be required to enhance the overall aesthetics of the local built environment and provide the opportunity for positive impacts.</p> <p>In relation to enhancing the built environment and protecting cultural assets, Gatwick Green has a similar capacity to contribute to this objective compared to the AAP area as a whole.</p> <p>The impact would therefore be Possible Positive Impact +?.</p>
4. To ensure that everyone has the opportunity to live in a decent and affordable home.	Possible Positive Impact +?	<p>As an employment site, Gatwick Green will not directly deliver decent and affordable homes. However, the provision of this land for employment ensures this need is met in a sustainable location, so contributing to balancing jobs with new homes in a sustainable manner. For this reason, land identified for Gatwick Green is viewed as having an uncertain, but potentially positive impact against this indicator.</p> <p>In relation to ensuring everyone has access to a decent and affordable home, Gatwick Green would ensure a balance between homes and jobs which is similar to the balance that the AAP area could achieve.</p> <p>The impact would therefore be Possible Positive Impact +?.</p>
5. To maintain, support and promote a diverse employment base that can serve the local and sub-regional and regional economy.	Possible Significant Positive Impact ++?	<p>As an employment site, land at Gatwick Green provides a high profile site for high quality business-led employment development in a highly sustainable location. The site will address the need for high-quality Strategic Employment Locations (SELs), employment space and support sustainable economic growth in the area. Gatwick Green is also uniquely placed to diversify the area's employment base given its ability to attract alternative occupiers to those normally locating at Manor Royal; in that sense it would have a high degree of complementarity with Manor Royal and help to rebalance the economy. The site therefore presents a significant opportunity to accommodate the business needs of Crawley and the wider region at a strategic location adjacent to the Airport, the M23, mainline rail and Fastway, so reinforcing the area's role as the leading employment destination in the Gatwick Diamond. Gatwick Green offers more scope to deliver these benefits than other parts of the AAP area.</p> <p>Gatwick Green has an enhanced capability to promote a diverse economic base to support the local and sub-regional economy similar to that of the AAP area as a whole, but greater than other locations with the area.</p> <p>The impact would therefore be Possible Significant Positive Impact ++.</p>

Sustainability Objective	AAP Assessment	Gatwick Green Assessment
<p>6. To conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough.</p>	<p>Possible Negative Impact -?</p>	<p>The site is not subject to any statutory landscape or nature conservation designations, but local landscape values and biodiversity have been recognised in policies in the adopted CBLP. Whilst it may have slightly higher values than other parts of the AAP area, some of those areas are subject to statutory nature conservation designations. The development of land at Gatwick Green for employment use could have a negative impact on biodiversity, landscape features, flora and fauna. However, the strategic size of the site presents an opportunity to mitigate impacts on biodiversity or provide compensation. Such mitigation or compensation could be inherent or additional, either as part of the scheme or on other land in Wilky's ownership. Development of the site will in any event need to comply with future requirements to deliver Biodiversity Net Gain, presenting the opportunity to enhance habitats and landscape features.</p> <p>Compared to the AAP area as a whole, Gatwick Green has a slightly higher level of biodiversity value, but is not affected by any statutory nature conservation designations: its therefore has a marginally greater potential to mitigate or compensate impacts and deliver biodiversity net gain compared with the AAP area.</p> <p>The impact would therefore be Possible Positive Impact +?.</p>
<p>7. To reduce car journeys and promote sustainable and alternative methods of transport, whilst ensuring sufficient transport infrastructure is delivered to meet the requirements of the borough.</p>	<p>Possible Positive Impact +?</p>	<p>Land at Gatwick Green is located beyond the Built Up Area Boundary which means economic development would potentially increase the need to travel to access employment facilities. However, Gatwick Green is situated in a highly sustainable location adjacent to the Airport, the M23, mainline rail and Fastway, so offering significant scope for highly sustainable arrangements for access. This location combined with the sale of development proposed, creates the opportunity for the wider provision of sustainable transport infrastructure at the site and in adjacent areas. This would make the development highly accessible by sustainable modes of transport, including Fastway, local bus services, walking and cycling. Such arrangements could benefit nearby employment areas and the Airport. Further, the provision of higher value and more diverse job opportunities would help to retain employees in an area that is overly reliant on low skilled jobs at the Airport and elsewhere: this will help to reduce levels of less sustainable out-commuting to London.</p> <p>Gatwick Green is located at the most accessible location in the AAP area with greater scope to reduce out-commuting to London; consequently, it has a higher sustainability profile than other parts of the AAP area.</p> <p>The impact would therefore be Possible Significant Positive Impact ++.</p>

Sustainability Objective	AAP Assessment	Gatwick Green Assessment
8. To ensure the provision of sufficient infrastructure to meet the requirements of the borough.	Possible Positive Impact +	<p>The development of land at Gatwick Green for employment use will require a range of infrastructure to address transport, energy, renewable energy, utility, broadband/5G and social needs. The scale of development at Gatwick Green offers the opportunity for innovative and high quality infrastructure to address these needs - these will meet the needs of proposed development and could help meet wider requirements of the borough. The potential of Gatwick Green in this regard is likely to be higher than that of the AAP area as a whole.</p> <p>Aerodrome safeguarding requirements must be adhered to, including a PSZ for the standby runway at Gatwick Airport. However, this does not represent a constraint to the site being developed as the safety limitation surfaces under these requirements are of significant height and limitations in regards to lighting can be addressed in design.</p> <p>The scale and high value of Gatwick Green offers the opportunity for greater innovation and quality of infrastructure to meet wider needs compared with the potential in the AAP area as a whole.</p> <p>The impact would therefore be Positive Impact +.</p>
9. To promote active, cohesive and socially sustainable communities and to ensure everyone has the opportunity to participate in sport and to encourage active, healthy and independent lifestyles.	Possible Positive Impact +?	<p>The strategic nature of land at Gatwick Green presents the opportunity to enhance bus, pedestrian and cycle links to nearby communities and offers scope to encourage healthy lifestyles through the design of such links and provision within the built environment. The scale of the proposed development also offers opportunities to incorporate a range of employee amenities and community uses, from sports, to leisure and recreational uses. The proposals also have the capability to offer higher value jobs, so helping to diversify the economy and create more socially-sustainable communities. Such benefits are not, however, exclusive to Gatwick Green as the AAP area as a whole offers similar opportunities.</p> <p>Gatwick Green has a similar capability to contribute towards cohesive and socially sustainable communities and provide for sport and recreation, which is similar to the capability of the AAP area.</p> <p>The impact would therefore be Possible Positive Impact +?</p>
Conclusion	-	<p>As an extension to the Main Employment Areas of Manor Royal and Gatwick Airport, or as a standalone site(s) for Strategic Employment Location(s) to meet the business land needs of Crawley as a sub-regional employment destination, land identified for the AAP represents the most sustainable location for strategic employment growth in Crawley. Some areas within the broadly identified area will be more sustainable than others – this applies to Gatwick Green given its scale, location, attributes and high profile, which means it has a higher sustainability profile compared to the AAP area. Overall, it would enable highly sustainable, high quality new development to complement and deliver linkages with the existing residential and business communities.</p>

Conclusion

In order to provide a profile of the relative sustainability of the Gatwick Green site compared with the AAP area as a whole, an evaluation has been undertaken using the same approach and method adopted in the Council's SEA. The

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			<p>site has therefore been assessed against the nine Sustainability Objectives taking account of the assessment criteria as set out in the SEA.</p> <p>The strategic environmental assessment of Gatwick Green has demonstrated that the site offers the capability to meet the identified need for strategic, high-quality employment space in Crawley to serve the wider region in a highly sustainable manner. It would enable highly sustainable, high-quality new development to complement Manor Royal and the Airport and deliver important linkages with the existing residential and business communities in the Borough. Overall, the site has the following attributes: limited environmental and landscape values; significant opportunities for biodiversity gain; an opportunity to rebalance the local economy and reduce out-commuting; contribute towards the quality of the built environment; provide sustainable transport modes that benefit the wider area; deliver socio-economic benefits; minimise impacts on climate change, but build in resilience to the same; deliver sub-regional economic objectives, and incorporate innovative infrastructure to provide local benefits.</p> <p>These attributes largely arise from the size, location and high profile of Gatwick Green, which means it has a higher sustainability profile than the Area Action Plan area as a whole. It therefore provides the opportunity for a strategic employment location which can be brought forward efficiently and sustainably to deliver significant socio-economic benefits to communities across Crawley and Reigate and Banstead in the event that the proposal for an AAP in the DCBLP is not adopted.</p>
			<p>Suggested Modifications:</p> <p>Conclusions</p> <p>In conclusion, the findings of the SEA are supported, but subject to the following conclusions with regard to the assessments in relation the proposed North Crawley AAP under Policy SD3, safeguarding for airport expansion and with regard to proposed strategic employment development at Gatwick Green:</p> <ol style="list-style-type: none"> 1. In relation to the AAP, the SEA identifies a possible adverse effect related to the potential for negative impacts on the aim to conserve / enhance biodiversity and landscapes. Whilst there may be some negative effects from development, it is considered that the need to provide mitigation and/or compensation under the net biodiversity gain policy in the NPPF will ensure that overall, the effects would be neutral to positive. 2. In relation to safeguarding, the SEA supports the decision to remove blanket safeguarding from the DCBLP, but TWG considers on balance that the AAP designation whilst sound, is a less than optimal policy response given the potential negative consequences associated with any delay in allocating land for strategic employment. 3. A high-level sustainability assessment of the Gatwick Green site has concluded that it has a sustainability profile that is more positive than that for the AAP area as a whole: this provides clear evidence Gatwick Green represents a strategic opportunity that can be developed in a very sustainable manner consistent with national policy.

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REP/069	Natural England	Sustainability Appraisal	<p>Planning consultation: Submission draft Crawley Local Plan (Regulation 19)</p> <p>Thank you for your consultation on the above dated 20 January 2020 which was received by Natural England on 20 January 2020.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England has reviewed the Crawley Local Plan Regulation 19 and accompanying appendices together with the Habitats Regulations Assessment (HRA) and Sustainability Appraisal (SA). Please note that we have not provided comments on all policies but those that are within our remit. Natural England has no comment to make on the policies not covered in this response.</p> <p>We agree with the findings in the Sustainability Appraisal and Habitats Regulation Assessment.</p> <p>We have no further comments in relation to this submission.</p>

**APPENDIX D: SUMMARY OF SECOND PUBLICATION CONSULTATION
RESPONSES (January – June 2021)**

Additional Publication Consultation (Regulation 19) 6 January – 30 June 2021 Sustainability Appraisal/Strategic Environmental Assessment			
Ref. No.	Respondent	Policy/ Para	Comments
REP/022	Sussex Ornithological Society	ST4	We have no further points to raise in regard to the Sustainability Appraisal/Strategic Environmental Assessment, and would like the comments we made in our March submission to go forward. Suggested Modifications:
REP/055	Savills on behalf of Wilky Group Agent	EC1	<p>1.0 Introduction</p> <p>1.1 This representation is submitted on behalf of The Wilky Group (TWG), which has a longstanding interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. This representation relates to the draft Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) (Crawley Borough Council Local Plan Review Sustainability Appraisal / Strategic Environmental Assessment, Draft Report, For the Submission Local Plan, January 2021) that supports the draft Crawley Borough Local Plan, 2021 (DCBLP).</p> <p>1.2 TWG owns about 48 ha (119 acres) of land east of Gatwick Airport. The land has been promoted by TWG as a strategic employment opportunity known as Gatwick Green (the Site). The Site is proposed for allocation as a Strategic Employment Location (SEL) of 47 ha (116 acres) in the DCBLP under Strategic Policy EC4 as a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8.</p> <p>1.3 This representation notes that the SA/SEA has been prepared in accordance with the advice in the Planning Practice Guidance (PPG), and that specifically its assessment in relation to Strategic Policies EC1 and EC4 and Policy GAT2 is sound.</p> <p>2.0 Strategic Policy EC1</p> <p>2.1 The Council has assessed the alternative options in relation to addressing the unmet economic and employment land needs of the Borough in its Sustainability Appraisal (SA/SEA). This evaluated three options: (1) rely on the NPPF to direct economic growth to the most appropriate locations, (2) adopt an employment land requirement based on Crawley’s housing land supply and accommodate economic growth in existing employment areas and in neighbouring council areas, and (3) plan positively for growth in line with the role of Crawley and accommodate economic growth at the main employment areas and the allocation of Gatwick Green to meet industrial and warehouse requirements.</p> <p>2.2 Option 3 was selected as the most sustainable option as it recognised Crawley as a key employment destination with a minimum land requirement of 38.7 ha to be met through development in the main employment areas, small extensions to Manor Royal and the allocation of Gatwick Green. This approach enabled (page 176):</p> <p><i>“...Crawley to respond to market signals, planning for the specific sectors where growth is identified, and support economic recovery from the current economic challenges posed by Covid-19. In identifying new business land, the approach will help to retain and attract business and investment, both to Crawley and the wider functional economic market area. In doing so, the approach responds to NPPF requirements to plan positively for economic growth, and reinforcing and strengthening Crawley’s economic role, and that of the wider area.”</i></p>

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			<p>2.3 This analysis was reflected in Topic Paper 5 (Employment Needs and Land Supply). Importantly, the assessment was predicated on the need to plan for a minimum of 38.7 ha of new employment land and a minimum of 77,800 sqm of employment floorspace – this underlines the positive policy response to planning for the future economic needs of the Borough, allowing for flexibility so as to future-proof the economy.</p> <p>2.4 Applying the employment requirements as minima was a key part of the Council’s SA/SEA, demonstrating that this approach was the most sound of the options considered. More detailed evidence contained in Savills’ representation on behalf of TWG in relation to Strategic Policy EC1 demonstrates that the Council’s analysis is correct such that there is a sound case in support of Strategic Policy EC1, subject to some minor adjustments as referred to in the representation.</p>
		EC4	<p>Suggested Modifications:</p> <p>3.0 Strategic Policy EC4</p> <p>3.1 The Council has assessed the alternative options for providing for an Strategic Employment Location (SEL) in its Sustainability Appraisal (SA/SEA). This evaluated three options: (1) allocate a SEL only through Strategic Policy EC1, (2) allocate a SEL through a dedicated local plan policy, and (3) explore the scope to allocate an industrialised SEL through an Area Action Plan.</p> <p>3.2 Option 2 was selected as it allowed for detailed matters relating to the amount and type of business floorspace, transport and access, design and amenity and environmental considerations to be addressed in policy and provide a framework to achieve a sustainable development through a masterplan and planning application. The Council’s approach is supported in that it has allowed for the Gatwick Green SEL to be identified as part of the overall economic strategy for the Borough articulated in Strategic Policy EC1, with the detailed matters relating to site / development requirements to be addressed separately in a site-specific policy (EC4).</p> <p>3.3 More detailed evidence contained in Savills’ representation on behalf of TWG in relation to Strategic Policy EC4 demonstrates that the Council’s analysis is correct such that there is a sound case in support of Strategic Policy EC4, subject to some minor adjustments as referred to in the representation.</p>
		GAT2	<p>Suggested Modifications:</p> <p>4.0 Policy GAT2</p> <p>4.1 The Council has assessed the alternative options in relation to Safeguarded Land in its Sustainability Appraisal (SA/SEA). This evaluated three options: (1) safeguarding land as shown in the GAMP, (2) do not safeguard any land, and (3) safeguard land with an amended boundary to allow for strategic employment provision. Option 3 was selected as the most sustainable option as it responded to national policy to retain safeguarding, but with an amended boundary to accommodate Crawley’s unmet employment land needs in the form of a SEL at Gatwick Green. This approach enabled land south of the airport required to accommodate the physical land take of a possible wide-spaced runway and its operations to be retained. The approach was based on the following analysis:</p>

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			<p><i>“The council does not consider parking to represent an efficient use of the site, particularly given the significant employment needs of Crawley borough, and is of the view that the airport could accommodate parking more efficiently through decked and robotic parking and other efficiency measures, should it be demonstrated that additional on-airport parking is required having regard to the airport’s surface access obligations stated in the S106 legal agreement.”</i></p> <p>4.2 This analysis was reflected in Topic Paper 2 on Gatwick Airport. More detailed evidence contained in Savills’ representation on behalf of TWG in relation to Policy GAT2 demonstrates that the Council’s analysis is correct such that there is an overwhelming and sound case in support of Policy GAT2, subject to some minor adjustments as referred to in the representation.</p>
			Suggested Modifications:
		ST1 IN1	<p>5.0 Other policies</p> <p>5.1 The SA/SEA also contains comparative evaluations of the options with regard to sustainable transport and infrastructure provision (Strategic Policies ST1 and IN1). In relation to these evaluations, the SA/SEA concluded in favour of locally-specific policies on sustainable transport and infrastructure over relying on the NPPF (the ‘do nothing’ option). Both evaluations demonstrated significantly more benefits for a detailed locally specific policy over the ‘do nothing’ option. More detailed evidence contained in Savills’ representation on behalf of TWG in relation to Strategic Policy ST1 and IN1 demonstrates that the Council’s analysis is correct such that there is an overwhelming and sound case in support of these policies.</p>
			Suggested Modifications:
			<p>6.0 Conclusions</p> <p>6.1 Overall, TWG supports the Council’s SA/SEA and specifically with regard to its evaluations and conclusions in relation to Strategic Policies EC1, EC4, ST1 and IN1, and Policy GAT2. TWG’s representations on these policies put forward some minor changes to the policies in order to achieve greater consistency and clarification, and achieve some more sustainable outcomes. TWG’s consultants have considered the proposed changes and have concluded that they would not materially affect the conclusions set out in the SA/SEA.</p>
			Suggested Modifications:
REP/0 58	Reigate and Banstead Borough Council	p29	<p>The SA/SEA (page 29) the assessment of the sustainability of the proposed allocation site of Gatwick Green is less than neutral, with only one SA objectives being positive “green”. Whilst we accept the Council’s statement that this is the only “reasonable option” to accommodate the identified B8 logistics floorspace need identified, as all other sites promoted as currently in the airport safeguarding land for a second (southern) runway and A23 re-alignment (whereas this site is also safeguarded land for the airport’s expansion, but for surface car parking), we do not see that the Council has assessed the sustainability of the option of not allocating a land to meet this identified B8 need. This is considered a failure of the SA/SEA to consider all reasonable options. This is an issue of legal compliance with regards to this proposed site allocation.</p>

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			<p>Conclusion</p> <p>We hope that you find these comments helpful. Should you have any queries, please do not hesitate to contact us. We note that there are still outstanding results from some of the assessments in the HRA, so we wish to be notified when such results are published. We will be happy to discuss this, and any other comments made in the representation above in more detail.</p> <p>Suggested Modifications:</p>
REP/044	Tim North & Associates Ltd on behalf of Hx Properties Ltd	GAT3	<p>See attached correspondence dated 18 February 2021*</p> <p>Draft Crawley Borough Local Plan Review 2021-2037 – Regulation 19 Consultation</p> <p>My clients, HX Properties Ltd, object to the assessment carried out in the Sustainability Appraisal/Strategic Environmental Assessment (hereinafter referred to as SA/SEA) dated January 2021 accompanying the latest Regulation 19 Version of the Draft Crawley Borough Local Plan 2021-2037 (hereinafter referred to as the DCBLP 2021-2037), where it relates to Policy GAT3. It is contended that the SA/SEA is deficient, inadequate and unsound where the appraisal concerns Policy GAT3.</p> <p>There is a duty to carry out a legally adequate SA/SEA in order to comply with the EU Strategic Environmental Assessment Directive 2001/42. The SA/SEA must consider Policy GAT3 and “<i>reasonable alternatives</i>” to it, with the provisions of Article 5 of the Directive having been transposed into UK law through the Environmental (Assessment of Plans and Programmes) Regulations 2004. Regulation 12 is particularly relevant, being concerned with the preparation of an environmental report.</p> <p>It is contended that the assessment of the amended “<i>reasonable alternatives</i>” to Policy GAT3 is defective, representing a fundamental flaw which extends to the soundness of the process. There is no obligation, as far as the law is concerned, to choose the most sustainable option, or the most sustainable of two policy options, since the requirements of the appraisal are entirely procedural [<i>R (on the application of Friends of the Earth) v The Welsh Ministers (2015) EWHC 776 (Admin)</i>] {12} and {75}. Sound reasons must, however, be given for the rejection of “<i>reasonable alternatives</i>” so that consultees are able to know what those reasons are. (<i>Save Historic Newmarket Community v Forest Heath District Council (2011) EHWc 606</i>).</p> <p>It is appreciated that the SA/SEA is an iterative process, and therefore it is relevant to consider how your Authority has arrived at the two “<i>reasonable alternatives</i>” relating to the latest version of the SA/SEA concerning the subject of “<i>Gatwick Airport Related Car Parking</i>”.</p> <p>In the case of the earlier Regulation 19 version of the DCBLP 20210-2035, two alternative policy scenarios were considered: Option 1 being to provide additional car parking within the airport boundary; and Option 2 to allow car parking in other areas. These were precisely the same two policy options that were considered in the SA/SEA dated December 2015, relating to equivalent Policy GAT3 in the statutorily adopted Crawley Borough Local Plan 2015-2030.</p> <p>The SA/SEA as part of the statutorily adopted Crawley Borough Local Plan 2015-2030 considered both policy options against ten Sustainability Objectives. Sustainability Objectives 1 to 8 inclusive set out in the SA/SEA dated December 2015</p>

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			<p>are precisely the same as the Sustainability Objectives against which Policy GAT2 of the earlier Regulation 19 version of the DCBLP 2020-2035 were assessed. Sustainability Objectives 9 and 10 where they relate to the SA/SEA dated December 2015 concerning the adopted Local Plan were amalgamated to produce one Sustainability Objective 9 in the SA/SEA Regulation 19 version of the DCBLP 2020-2035.</p> <p>In effect, what were previously Sustainability Objectives 9 and 10 namely “<i>To promote active cohesive and socially sustainable communities</i>” and “<i>To ensure everyone has the opportunity to participate in sport and to encourage active, healthy and independent lifestyles</i>” respectively, were amalgamated into a single Sustainability Objective 9 where it formed part of the SA/SEA Regulation 19 version of the DCBLP 2020-2035, viz: “<i>To ensure healthy, active, cohesive and socially sustainable communities. To ensure all benefit from a good quality of life., To ensure everyone has the opportunity to participate in sport and to encourage active lifestyles.</i>”</p> <p>It follows that the SA/SEA methodology had not materially changed between that relied upon in the adopted Crawley Borough Local Plan 2015-2030 where it relates to Policy GAT3, and that which forms the basis to the earlier Regulation 19 version of the DCBLP 2020-3035 concerning equivalent Policy GAT2. This being the case, and given that the two policy options in the two earlier SA/SEAs were virtually identical; no reasoned justification was advanced as to why the scores in respect of the two SA/SEAs relating to Policies GAT3 and GAT2 respectively had changed.</p> <p>The two “<i>reasonable alternatives</i>” in the SA/SEA dated January 2021 relating to Policy GAT3 “<i>Gatwick Airport Related Car Parking</i>” comprising part of the latest Regulation 19 version of the DCBLP 2021-2037 are fundamentally different from the earlier SA/SEA January 2020 where it related to the same policy. Option 1 is now concerned with the provision of additional or replacement airport-related car parking which is only to be permitted where it is (i) located within the airport boundary; (ii) it is justified by a demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport within the airport boundary. Option 2 provides for additional or replacement airport related car parking within the airport boundary and at locations outside the airport boundary provided it is justified by a demonstrable need.</p> <p>The scores against the 9 Sustainability Objectives are very similar, with Option 2 scoring double minuses in respect of minimising climate change; adapting to climate change and promoting sustainable journeys, compared with Option 1 where a single minus is scored. It is therefore necessary to consider how these different scores have been derived in the evaluation process.</p> <p>It is necessary at the outset to record that both “<i>reasonable alternatives</i>” seek to provide airport related car parking within the boundary of Gatwick Airport, with Option 2 also allowing for locations outside the airport boundary. Crucially, both options irrespective of their location, are only considered acceptable where they are justified by a demonstrable need.</p> <p>My clients do not object to the fact that long term off-airport car parking proposals are required to show a demonstrable need, in the same way as on-airport car parking proposals, although for reasons stated in the representations to GAT3 as</p>

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			<p>set out in DCBLP 2021-2037, there is no justification why GAL should have to provide a demonstrable need, having regard to “<i>permitted development rights</i>” available to the airport owner.</p> <p>The alteration in the two options in the SA/SEA January 2021 version compared with the earlier SA/SEA of January 2020, are now expressed in a similar way to what was previously Policy GAT8 set out in the formerly adopted Crawley Borough Local Plan 2000, where the limitation was expressed in the following terms:- <i>“The Borough Council will only permit proposals for airport-related car parking on off-airport sites where they do not conflict with countryside policies and can be justified by a demonstrable need in the context of proposals for achieving a more sustainable approach to surface transport access to the airport.”</i></p> <p>With both “<i>reasonable alternatives</i>” now required to show a demonstrable need, means that in terms of a long term off-airport car parking proposal, an applicant is required to show that existing and future demand for, and capacity (supply) of, on-airport related car parking is not or will not be met. A demonstrable need for a long term off-airport car parking proposal will not be proven in a situation where the provision of available car parking spaces on-airport seen in the context of future on-airport related car parking capacity can be achieved. In effect, if these two factors are “<i>in balance</i>” adopting the term applied by GAL, planning permission will not be granted for a long term off-airport car parking use.</p> <p>The commentary to Option 2 in the SA/SEA January 2021 provides the underlying justification for the difference in the scoring concerning Sustainability Objectives, 1, 2 and 7 between the two “<i>reasonable alternatives</i>”. It is said “<i>An approach that allows airport-related parking in off-airport locations is likely to encourage users to access Gatwick Airport by car and will increase the number of trips and distance travelled by the vehicle and passenger travelling between the car park and the terminals.</i>”</p> <p>In a situation where planning permission is granted for a long term off-airport parking proposal based on a demonstrable need having been proven, means that the decision reached would not have been based on a choice between on- and off-airport car parking locations; but between managing long-term off-airport car parking in a location close to Gatwick Airport, where the only other realistic alternative is unmanaged, unauthorised airport related car parking occurring, more likely than not, at a distance further from Gatwick Airport than the site for which planning permission is being granted for the long term car parking use.</p> <p>This must be the case as this scenario arises because the demand for, and capacity of, on-airport related car parking, is not “<i>in balance</i>”, i.e. planning permission would have been forthcoming for the long term off airport use based on a demonstrable need, as on-airport car parking demand either does not or will not will not meet anticipated on-airport supply at Gatwick Airport.</p> <p>For similar reasons, the commentary relating to Option 2 is flawed where it states “... <i>the approach would also undermine the ability of the airport operator to meet obligations set out in the S106 legal agreement, including the</i></p>

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			<p><i>requirement to provide ‘sufficient but no more on-airport car parking spaces than necessary to achieve a combined on and off-airport supply that is proportionate to 48% of non-transfer passengers choosing to use public transport for their journeys to and from the airport by 2022’.</i>”</p> <p>Aside from the fact that 48% is not a challenging target, the Council’s approach in this regard may have been considered appropriate in circumstances where Option 2 was based on the same “<i>reasonable alternative</i>” as set out in the earlier SA/SEA January 2020 comprising part of the DCBLP 2020-2035, concerning Policy GAT2, namely “<i>to allow car parking in other areas</i>”.</p> <p>The fundamental difference between the Option 2 where it formed part of the DCBLP 2020-2035 and that comprising part of the DCBLP 2021-2037 is the requirement to show a demonstrable need. The fact that a demonstrable need is necessary means that the comment raised in this paragraph has no validity, if only because in this scenario, GAL’s on airport car parking demand either does not or will not meet on-airport car parking supply.</p> <p>This justification is further flawed because there is no reason why in circumstances where a long term off-airport car parking site is granted planning permission based on demonstrable need being shown to exist, that a contribution in terms of a public transport levy should not be applied to meet the obligations in the Section 106 Legal Agreement.</p> <p>Similarly, there is no evidence to justify the assertion that “<i>the provision of airport-related parking in off-airport locations can detract from biodiversity and landscaping, frequently requiring hardstanding and lighting and places pressure on land which could be more beneficially used for other purposes.</i>” The opportunity to provide effective landscaping and contributing to net gains in biodiversity are equally if not more likely to be achieved in a long term off-airport car parking location where the land is less constrained in terms of available space than it is on Gatwick Airport. Both on- and off-airport parking provision require hardstanding and lighting, whilst the proposition that the land could be more beneficially used for other purposes is equally applicable to circumstances on-airport given the variety of activities associated with an international airport, than it is to a site where the aim is to provide for a long term off-airport use.</p> <p>It follows that the underlying reasoning provided by the LPA why they consider Option 2 to be less sustainable than the approach in Option 1 is unsound and hence unlawful. It has failed to appreciate that Option 2 is not simply “<i>to allow car parking in other areas</i>” as was the case with the previous iteration of the SA/SEA, but in this case it is “<i>to provide additional or replacement airport related car parking within the airport boundary and at locations outside the airport boundary provided it is justified by demonstrable need.</i>”</p> <p>The commentary to Option 2 concerning Policy GAT3 in the DCBLP 2021-2037 also refers to the High Court challenge in which my clients sought to quash Policy GAT3 set out in the Crawley Borough Local Plan 2015-2030. This is prayed-in-aid to justify the comments for discounting Option 2 as a “<i>reasonable alternative</i>” in the DCBLP</p>

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			<p>2021-2037, even though Holiday Extras Limited did not seek to raise any representations to the SA/SEA where it was directed to Policy GAT3 found in the earlier Crawley Borough Local Plan 2015-2030.</p> <p>The SA/SEA accompanying the adopted Crawley Borough Local Plan 2015-2030 contained no “<i>reasonable alternative</i>” commensurate with that now set out in Option 2 of the DCBLP 2021-2037. To this end, Option 2 found in the SA/SEA accompanying the adopted Crawley Borough Local Plan 2015-2030 is materially different from Option 2 set out in the DCBLP 2021-2037, despite the fact that the Local Plan Inspector did not preclude the possibility of planning permission being granted for long term off-airport car parking if it could be shown that material considerations justified going against the provisions of the same Plan. In effect, the requirement to show a demonstrable need is akin to a material consideration dictating circumstances where a long term off-airport car parking proposal would be acceptable.</p> <p>The current iteration of Option 2 in the SA/SEA provides an opportunity to prioritise those forms of long term off-airport car parking facilities which are the most sustainable seen from a transport perspective. Clear differences arise between the “<i>meet and greet</i>” model and the “<i>park and ride</i>” form of long term off-airport car parking, with the latter offering distinct benefits in terms of reduced numbers of trips by passengers accessing the airport; congestion on the road network leading to Gatwick Airport, and the accumulation of CO₂ emissions on-airport. These are factors which have not been explored as part of any assessment of “<i>reasonable alternatives</i>” in the SA/SEA relating to Policy GAT3.</p> <p>Suggested Modifications:</p> <p>The SA/SEA where it concerns Policy GAT3 is defective and has not properly assessed "reasonable alternatives". Both "reasonable alternatives" seek to provide airport related car parking within the boundary of Gatwick Airport, with Option 2 allowing for locations outside the airport boundary. Both options critically are only considered exceptional where they are justified by demonstrable need, There is no justification why GAL should have to provide a demonstrable need, having regard to "permitted development rights" available to the Airport Owner.</p> <p>In a situation where planning permission is sought for a long term off-airport car parking proposal, it can only be based on a demonstrable need being proven. This means that in terms of the long term off-airport car parking proposal an applicant is required to show that existing and future demand for, and capacity (supply) of, on-airport related car parking is not, or will not be met. The choice in these circumstances between on- and off-airport parking provision is between managing long term car parking in a location close to Gatwick Airport, or allowing for unmanaged, unauthorised airport related car parking to occur, more likely than not at a distance further from Gatwick Airport than the site for which planning permission is being sought for a long term off-airport car parking use.</p> <p>The commentary relating to Option 2 is completely flawed given the fact that a long term off-airport car parking use would have to show a demonstrable need. There has been a fundamental change between the two options in the submission Version of the DCBLP 2021-2037 and the earlier Regulation 19 version of the DCBLP 2020-2035, although this does not</p>

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			<p>appear to have been appreciated in drafting the commentary to Option 2 in the latest SA/SEA, which reflects that of the earlier Regulation 19 version of the Plan.</p> <p>The underlying reason why the LPA consider Option 2 to be less sustainable than Option 1 in the latest iteration of the SA/SEA is unsound and unlawful. It has failed to appreciate that Option 2 is not simply based on "to allow car parking in other areas", but is now based on "to provide additional or replacement airport related car parking within the airport boundary and at locations outside the airport boundary provided it is justified by demonstrable need."</p> <p>For these reasons there is a need to re-appraise the two options in the SA/SEA.</p> <p>Attached correspondence dated 18 February 2021:</p> <p>Draft Crawley Borough Local Plan 2021-2037 January 2021 Regulation 19 Consultation</p> <p>This company raised an objection on behalf of my clients, HX Properties Ltd, to Policy GAT2 of the Regulation 19 version of the Draft Crawley Borough Local Plan 2020-2035, along with paragraphs 10.16 to 10.19 inclusive, providing the reasoned justification behind the same policy.</p> <p>Policy GAT3 concerned with " Gatwick Airport Related Parking" found in the latest Regulation 19 version of the Draft Crawley Borough Local Plan 2021-2037 (hereinafter referred to as DCBLP 2021-2037) reflects the previous version of the same policy, but with less force as the word "must" has been omitted before the phrase "be justified demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport". The two limbs comprising Policy GAT3 have now been separated, where previously they formed a single paragraph.</p> <p>My clients object to Policy GAT3 along with paragraphs 10.24 to 10.27 forming part of the reasoned justification behind the same policy, on the grounds that they have not been positively prepared, neither are they justified, nor are they consistent with national policy.</p> <p>The reasoned justification behind Policy GAT3 is fundamentally flawed, in that it takes no account of and is inconsistent with, the provisions of Schedule 2 Part 8 Class F of the Town & Country Planning (General Permitted Development) (England) Order 2015 (As Amended). The Airport Owner on "Operational Land" can construct surface car parking or build multi-storey car parks in accordance with the above mentioned "permitted development rights", for which no express planning permission is required, and more importantly, without having to justify "...a demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport". This situation applies, irrespective of whether the word "must" is to be inserted before the phrase "be justified".</p> <p>There is no disputing these facts. What it means is that Policy GAT3 as set out in the DCBLP 2021-2037 is completely unnecessary and serves no valid purpose, nullifying the reasoned justification set out in paragraphs 10.24 to 10.27 inclusive of the same version of the emerging Local Plan. There is no requirement for GAL to justify any form of airport-related car parking on operational land within its boundary, and equally no requirement to provide a demonstrable need in</p>

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			<p>the context of achieving a sustainable approach to surface transport access to the airport. Put simply, “<i>permitted development rights</i>” do not require a demonstrable need to be met.</p> <p>The fact that the Airport Operator is under no obligation to produce an assessment of demonstrable need to justify any on-airport surface or multi-storey car park on land forming part of its operational area, in accordance with the second limb of Policy GAT3, becomes immediately apparent from the decision taken by your Council to raise no objection to Application No. CR/2017/0523/CON.</p> <p>It is a well-known fact that Crawley Borough Council rely on GAL to support the central issue of “<i>demonstrable need</i>” on applications refused by your authority for long term off-airport car parking in its administrative area. The involvement of GAL means that, by association, it occupies a central position in the decision-making process, particularly in cases where an applicant proceeds to appeal against the Local Planning Authority’s refusal or non-determination of a long term off-airport car parking proposal. However, that is not a justifiable reason for incorporating a policy into the emerging Local Plan concerning a form of development in which your Authority have no control.</p> <p>GAL as a private company, enjoys a dominant position in surface access facilities provided at Gatwick Airport, being present in the upstream market (i.e. facilities at an airport, such as bus stations or car parks), as well as the downstream market (i.e. allowing providers to access the facilities at an airport), where they relate to surface access provision. GAL’s presence as an important integral part in the decision-making process, means that land use planning decisions governing airport related car parking proposals cannot be considered to be transparent. That is, they cannot be divorced from, and understandably are influenced by, private sector decisions promoted through GAL’s own Capital Investment Programmes.</p> <p>The insertion of Policy GAT3 into the Regulation 19 version of the DCBLP 2021-2037, where it is not necessary to do so for the reasons stated above, leads on to the question of whether its provisions unnecessarily restrict competition in respect of certain forms of long term off-airport car parking, in particular the “<i>park and ride</i>” model, which dependent on the selected location, is equally well placed to achieve a sustainable approach to surface transport access to the airport.</p> <p>Paragraph 14 of the NPPF 2019 states that for plan-making - “<i>plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to change</i>” (my emphasis). Policy GAT3 fails to achieve the sufficient flexibility sought by national policy, despite the fact that the location of Gatwick Airport is not included in one of the selected areas which provide a strong reason for restricting development in Footnote 2 of the same paragraph of current national policy.</p> <p>It follows from these representations that if Policy GAT3 is to be retained in the Regulation 19 version of the DCBLP 2021-2037, then consideration should be given to removing “<i>permitted development rights</i>” through an Article 4 Direction, where it relates to on-airport car parking provision on “<i>Operational Land</i>” within Gatwick Airport. The Article 4 Direction</p>

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			<p>process will then provide the purpose behind the same policy and its reasoned justification, allowing for more transparent decision-making, if only for reasons of having to justify a demonstrable need.</p> <p>This is not considered to be an unreasonable request in that GAL in its own representations to the earlier Regulation 19 version of the DCGLP 2020-2035, when considering the use of existing employment sites in the Borough which it states could be used more efficiently by means of intensification, redevelopment and design improvements, add:-</p> <p><i>“It is crucial that the Council uses Article 4 Directions to prevent the further loss of employment sites to residential development via Permitted Development Rights. The Council has continued to lose valuable employment sites due to the conversion of office buildings to residential accommodation via the prior approval process, and the draft Plan should proactively seek means to restrict such loss of its existing employment land stock.”</i></p> <p>A methodology should be agreed in which to assess long term demand and capacity issues concerning both on and off airport-related car parking provision, involving your Authority, GAL and representatives of those involved in lawful long term off-airport car parking facilities. This will reduce issues of dispute, or at least highlight those specific areas where agreement cannot be reached, surrounding existing and future demand for and capacity (supply) of airport related car parking, according to the concept that the same two factors are “<i>in balance</i>” as argued by GAL. To this end, through collaboration, a sound base for deciding applications will be provided, not dissimilar to the way in which the NPPF requests Local Planning Authorities to use the standard methodology in order to establish a minimum local housing needs figure (LHN) in their administrative areas.</p> <p>The contents of supporting paragraph 10.24 to Policy GAT3 refer to the 2019 Section 106 Planning Obligation entered into between Crawley Borough Council, West Sussex County Council and GAL, which sets out an obligation for the Airport Operator to achieve a target of 48% of passengers travelling to the airport by public transport by 2022. The figure of 48% is used as a metric to show that the amount of airport related car parking that needs to be provided for airport passenger throughput, in accordance with the Airport Operators Interim Car Parking Strategy April 2017, is in some way commensurate with public transport modal share. The 48% figure is not considered to be a challenging target, in that in the fourth quarter of 2017, (October to December), CAA’s O & D data reveals that a public transport modal share figure of 48.3% was reached, being in excess of the 48% target figure set down for 2022 (See the evidence of Mr Tom Nutt, Crawley BC to the Former Gasholder Station Car Park Appeal, the inquiry of which took place on 15-17 May 2017).</p> <p>No evidence has been produced to demonstrate that long term off-airport car parking has prevented the modal share in favour of public transport from being reached, as set out in the various iterations of the Gatwick Airport Surface Access Strategy (hereinafter referred to as GASAS) and associated Section 106 Planning Obligations. The target figure of 48% is in all probability likely to be met, even in the event that the figure were to be increased, when it is realised that visitors to the UK are always more likely to use public transport than those living and working in the UK.</p>

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			<p>The contents of paragraph 10.25 providing part of the reasoned justification to Policy GAT3 refer to a number of lawful long term off-airport car parking businesses, serving the needs of passengers using Gatwick Airport. The figure for long term off-airport car parking spaces set out at paragraph 2.3.30 of the Gatwick Airport Masterplan 2019, namely 21,196 authorised spaces is strongly disputed. There has been a consistent and marked reduction in the supply of long term off-airport car parking provision serving the airport, since the Gatwick Airport Interim Master Plan was published in 2006.</p> <p>Long term off airport car parking provides an important contribution to airport related car parking, meaning that it has a role to play in the supply of the same product, meeting not only a quantitative, but also a qualitative requirement. A number of long term off airport car parks have been found to occupy “<i>sustainable locations</i>” whilst at the same time offering “<i>customer choice</i>” (See appeal decisions at Acacia Grove, Copthorne (PINS Ref 2153589); City Place, Crawley (PINS Ref 2171971 & 2071972; and the Case Officer’s report at Southways Business Park (Crawley BC Ref. No. CR/2033/0094/FUL); Site E2 Crawley Business Quarter (Crawley BC Ref. No. CR/2014/0080/FUL and the Former BOC Edwards Site (CR/2014/0615/FUL)). This becomes evident from Inspectors’ appeal decisions in your Council’s administrative area, as well as the contents of Case Officers’ reports granting planning permission for the same use.</p> <p>A more flexible approach is required in the consideration of airport related car parking provision, given that issues of sustainability, when taken to an extreme as is the case with Policy GAT3, results in locations being defined solely by reference to whether a site lies within or outside the boundary of Gatwick Airport. That approach produces an anomalous situation, in that were your Council to accept an alteration to the boundaries of Gatwick Airport, so that it is commensurate with that indicated on Plan 20 in the Gatwick Masterplan 2019, (i.e. leading to an extension to the east beyond the London to Brighton Railway Line towards the M23 Motorway); what is at present considered to be an unsustainable location, would automatically become sustainable.</p> <p>In devising a policy devoted to “<i>Gatwick Airport Related Parking</i>”, requires sustainability issues to extend beyond consideration of whether a site is situated within or outside the boundaries of Gatwick Airport. A restrictive policy of the kind set out in GAT3 has adverse implications, with associated disadvantages for airport related car parking, with inadequate account taken of other related issues surrounding airport car parking provision, significant amongst which is unauthorised provision found in adjoining Authorities’ administrative areas, some distance from the airport.</p> <p>Indeed, Policy GAT3 takes no account of i) access arrangements from the particular car park whether on or off airport to the terminal buildings; or ii) the advantages of transporting a number of passengers to the Airport’s terminals utilising low emissions/eco-friendly buses. These benefits associated with a traditional park and ride off-airport parking facility have the ability to lead to a reduction in traffic movements, thereby alleviating congestion at strategically located junctions situated in close proximity to Gatwick Airport, at the same time having the propensity to reduce carbon emissions on-airport.</p>

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			<p>It is said in GAL’s representations to the July 2019 version of the DCBLP that the aim is to offer an attractive on airport car parking product as a means of discouraging use of less sustainable car parking options, which double the amount of car trips, whilst generating extra surface access journeys, which it is argued, add to congestion and CO₂ emissions compared with “<i>park and fly</i>”. These comments are wholly predicated on the “<i>kiss and fly</i>” and “<i>meet and greet</i>” car parking modes serving Gatwick Airport, which are the least sustainable. They take no account of traditional long term park and ride facilities, which are infinitely more sustainable than encouraging passengers to park on-airport. To the extent that GAL refer to a “<i>residual and increasing demand for parking for those passengers who choose to use the car</i>” dictates that the long term off-airport “<i>park and ride</i>” model has the ability to be the most sustainable option after dependence on public transport. Their importance will no doubt increase as electric vehicles become increasingly popular.</p> <p>It is a known fact that unless additional resources are provided to the Authority, and a proactive approach is taken to enforcement proceedings in respect of unlawful off-airport car parking uses, the ability to ensure a sustainable approach to airport related car parking will never be realised. Your Authority are on record as stating that unauthorised long term airport related car parking will continue to be a source of capacity (supply) into the future. Given these circumstances, to pursue a strategy which perpetuates, at the same time places reliance on unauthorised long term off-airport car parking, in preference to a properly managed lawful long term off-airport car parking facility, is the very antithesis of “<i>managing</i>” airport related car parking provision into the future.</p> <p>Evidence reveals that adopting the tact outlined in the previous paragraph will encourage long term off-airport car parking facilities of all models, in least sustainable locations seen in terms of distance to the north and south terminals, and is required to be compared with what otherwise may arise from lawful long term off-airport park and ride facilities which from a locational perspective, are sited in close proximity to the same terminals. It is also infinitely more sustainable to have sites granted planning permission, than for long term off-airport car parking facilities to be made lawful through CLEUDs.</p> <p>To impose an embargo on lawful long term off-airport car parking uses based on the park and ride model, would simply play into the hands of those unauthorised long term off-airport car parking businesses operated by rogue traders, with all the ensuing bad publicity for airport related car parking. It simply hands the impetus to those seeking CLEUDs for long term off-airport car parking uses on sites distant from the airport, catering for the “<i>meet and greet</i>” mode, which is the least desirable from a transport sustainability perspective.</p> <p>Policy GAT3 pays no regard to the increasing provision of organisations such as JustPark, a technological platform matching drivers with car parking spaces through its website and app, representing what is referred to as the “<i>sharing economy</i>”, having a profound impact on the ability to reduce the private car mode in favour of public transport, and appearing less sustainable than the provision of a traditional long-term off-airport car parking facility. To these</p>

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			<p>considerations can also be added the increasing focus placed on the use of on-street car parking, sometimes known as transit parking, in residential areas, before walking or taking a cab to the airport’s terminals.</p> <p>In conclusion, Policy GAT3 represents an abrogation of the responsibilities concerning the topic of airport related car parking from the Local Planning Authority to a private company, namely the Owner/Operator of Gatwick Airport, who is then passed the remit of meeting the modal split target of passengers, through total reliance placed on on-airport related car parking, without assessing alternative forms of access by private car to the same international airport. There are forms of long term off-airport car parking use which are in a position to contribute to sustainable transport through the provision of a public transport levy, in the same way a GAL provides for those travellers who have no alternative but to rely on the private car to access Gatwick Airport.</p>
REP/1 16	Neame Sutton Limited on behalf of Danescroft (RLP Crawley) LLP	SA TOPIC AREA C	<p>Housing Need, Housing Requirement/Target and, Supply Policy H1, SA (Topic Area C) and Table 5.1, Paragraphs 12.1 – 12.43 – OBJECT: Unsound</p> <p>3.17 The Council’s approach is also not entirely supported by the conclusions of its own Sustainability Appraisal (January 2021)(“SA”). The SA includes an option that meets both the full affordable housing requirement (generating a housing target of 1848 dpa) along with an option that meets the Standard Method calculation of 750 dpa. Both options score considerably better than the chosen option (Option 5) in terms of meeting housing needs (Pages 203-206 of the SA – January 2021). It is however unclear why some of the negative scores in relation to employment growth, health and infrastructure have been attributed to these higher housing growth options. The negative scores are attributed to ‘anticipated impacts’ rather than being based on any tangible evidence. It must be the case that the Council hasn’t based the assessment on tangible evidence because it has already identified that significant portions of the evidence base in relation to matters such as Transport modelling are yet to be completed and published.</p> <p>3.18 In this respect the conclusions of the SA cannot be relied upon and a further SA should be undertaken once the evidence base is complete.</p> <p>Suggested Modifications: As part of addressing the significant deficiencies in the Plan’s evidence base the following key changes are required to the Plan for it to be made Sound: 6. The SA needs to be undertaken again once the evidence base is complete to avoid unsubstantiated assumptions being applied to the assessment process;</p> <p>Site-Specific Representations in Relation to Land at Steers Lane, Crawley Policy H2 SA – OBJECT: Unsound</p> <p>4.14 As a consequence of the Council’s overly restrictive and flawed approach to aviation noise levels it has failed to properly assess the suitability of Area B for residential development. The opportunity to deliver a further 100 no. dwellings on Area B comprising a mix of open market and affordable homes has therefore been missed by the Council.</p>

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			<p>4.15 Area B should therefore be included as land suitable for residential development, particularly in the light of the recent report by the Government’s Climate advisors (Climate Change Committee) regarding the future of air travel in the context of the accelerated climate change agenda i.e. no net increase in airport capacity in the UK.</p> <p>4.16 The inclusion of Area B as a housing allocation would enable the Council to deliver upto another 100 no. dwellings (40 no. of which would be affordable) making a valuable contribution to the significant housing needs in the Borough.</p> <p>Suggested Modifications: As part of addressing the significant deficiencies in the Plan’s evidence base the following key changes are required to the Plan for it to be made Sound: 6. The SA needs to be undertaken again once the evidence base is complete to avoid unsubstantiated assumptions being applied to the assessment process;</p>
REP/1 24	Gladman Developments	SA	<p>1.2. Sustainability Appraisal</p> <p>1.2.1. In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan’s preparation, assessing the effects of the Local Plan’s proposals on sustainable development when judged against reasonable alternatives.</p> <p>1.2.2. Crawley Borough Council should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Crawley Local Plan’s decision-making and scoring should be robust, justified and transparent.</p> <p>Suggested Modifications:</p>
REP/1 20	Squires Planning		<p>(ii) Sustainability Appraisal and Habitat Regulations Assessment</p> <p>2.7. A Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) Draft Report (January 2021) has been published alongside the Regulation 19 consultation.</p> <p>2.8. The document confirms that Local Planning Authorities are required to carry out a Sustainability Appraisal (SA) for all Development Plan Documents to ensure that the Plan is designed in a sustainable manner. It goes on to confirm that the process involves examining the likely effects of the Local 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 place in the plan. It is noted that the report combines the SA, SEA, Health Impact Assessment (HIA) and Equalities Impact Assessment (EIA).</p> <p>2.9. Carrying out a sustainability appraisal of a local plan is an essential part of the plan-making process. The sustainability appraisal is not a one-off exercise; it needs to be integrated into the various stages of plan making. It</p>

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			<p>provides evidence, helps to test that evidence and helps with developing options. It cannot just be done as a 'looking back' exercise at the end and so it warrants consideration at the earliest stage of plan making. Failure to carry out the sustainability appraisal process properly will result in a local plan not being legally compliant.</p> <p>2.10. One of the requirements of the Strategic Environmental Assessment (SEA) Regulations is to include an assessment of any reasonable alternatives, taking into account the objectives and the geographical extent of the plan or programme. Reasons must, however, be given for the rejection of “reasonable alternatives” so that consultees are able to know what those reasons are. (Save Historic Newmarket Community v Forest Heath District Council (2011) EHCW 606).</p> <p>2.11. It should therefore be clear within the SA why some policy options have progressed, and others have been rejected. This must be undertaken through a comparative and equal assessment of each reasonable alternative, in the same level of detail for both chosen and rejected alternatives. The Council’s decision-making and scoring should be robust, justified and transparent.</p> <p>2.12. We provide detailed commentary below on the matters we have identified as being problematic in relation how EC4 has been considered and the final policy solution arrived at. It should be noted that we have not sought to review the whole document and there may therefore be other problematic areas within the document. The matters we wish to address are:</p> <ul style="list-style-type: none"> • Insufficient evidence to prepare SA. • The spatial approach to meeting Crawley’s land use needs. • Prejudicing the delivery of a second runway, should it be required by national policy. • Assessment of Economic Growth Options • Assessment of Policy Option <p><u>Insufficient evidence to prepare SA.</u></p> <p>2.13. Since the Draft Crawley Local Plan Regulation 19 consultation commenced a number of documents have been published including the Viability Study, Draft Duty to Cooperate Statement and Crawley Transport Study. The findings of these documents should be taken into consideration in an update to the SA/ SEA. However, the SA/SEA does not appear to have been updated since its publication in January 2021. We urge that this is rectified and that the latest evidence is incorporated into the SA/SEA. Without this happening, it is likely that the SA will fail to properly assess likely significant impacts of the policy approaches taken and as a result fail the legal compliance test. The spatial approach to meeting Crawley’s land use needs.</p> <p>2.14. Page 137 of the SA/SEA sets out three scenarios for the ‘Spatial Strategy and Vision’ of the Local Plan. 1. A sub region with a South East regional focus. 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, as well as potentially those of the wider area. 2. Scenario 2: A sub regional focus. The sub regional focus is an ‘At Crawley’ approach for the purposes of Duty to Cooperate. This is reference to the ‘At Crawley Study’ (2009) which included areas of search immediately adjacent to the administrative boundary for</p>

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			<p>meeting the land use needs of Crawley. 3. Scenario 3: Crawley Borough focus. This would maximise development opportunities within the borough boundary.</p> <p>2.15. The chosen option is a combination of a sub-regional focus and Crawley Borough focus which seeks to meet needs within the borough and adjacent to it through the Duty to Cooperate.</p> <p>2.16. In following this approach, Crawley, in the previous draft submission consultation proposed an Area Action Plan to allocate employment land within the 15-year plan period. This consultation has removed that approach, following advice from the planning inspectorate. Instead, this spatial approach has resulted in allocation of an employment site (Policy EC4) within the borough boundary to meet employment needs over the 15- year plan period. However, to do so involves the removal of a large area that is safeguarded for a second runway should it be required by national policy. As is explained further on in this response, the approach lacks the evidence to justify that it would not be incompatible with delivery of a second runway and is therefore contrary to national aviation policy.</p> <p>2.17. The Crawley Borough/sub regional “At Crawley” focus has led to the current decision to allocate the ‘Gatwick Green’ site contrary to national policy. This must be accepted by Crawley and a different approach undertaken to meet employment needs.</p> <p>2.18. SA/SEA is an iterative process and in the face of not being able to deliver employment land under scenario 2 and 3, a review of strategic approach regarding employment needs should have been undertaken and assessed within the SA/SEA. It is likely that this would have led to an in-combination approach with Scenario 1 as this wider geographical focus and joint working could have resulted in successfully meeting employment needs outside the borough. However, this was not pursued and as a result has led to the inappropriate allocation of employment land on an area that is safeguarded for a second runway. The approach to the Spatial Strategy and Vision, is therefore considered unreasonable as it fails to maximise sustainable development opportunities in line with national policy and against the objectives of the SA/SEA.</p> <p>2.19. Page 329-356 of the SA includes an assessment of the only accepted employment site ‘Gatwick Green’ and all the rejected sites, against the SA objectives. It is clear from reading the assessments that the overarching basis for the proposed allocation of ‘Gatwick Green’ and the rejection of most the other potential locations is that the ‘Gatwick Green’ site is considered by Crawley Borough Council to be in an area that is not needed for a second runway and the other locations are. Without this distinction other sites could be preferable such as Land at Rowley Farm or a combination of sites. Prejudicing the delivery of a second runway, should it be required by national policy.</p> <p>2.20. As covered elsewhere in this response, the ‘Gatwick Green’ area has not been proven to be surplus to requirements for the delivery of a second runway at Gatwick Airport. On this basis the site should also be rejected alongside the other potential employment sites listed. The ++ economic benefits identified are questioned as there is no certainty that the</p>

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			<p>allocation would not prejudice the delivery of a second runway leading to economic damage on a national scale. Assessment of Economic Growth Options</p> <p>2.21. What the assessment of sites highlight is that should safeguarding be lifted in the future, the ‘Gatwick Green’ site would likely not be the most sustainable location to meet employment needs. It appears short sighted to allocate this land when, in the next few years, safeguarding could be lifted, and all sites can at that time be assessed in an equal way, with the most sustainable option chosen. Whilst this is not the right time to compare sites within the safeguarded area, it is evident from the SA that a strategic employment site north of Manor Royal would be the most sustainable location should safeguarding be lifted.</p> <p>2.22. It is noted that under the assessment of the ‘Gatwick Green’ site the impact on Objective 3 - Protect and/or Enhance the Built Environment, is scored as a possible positive impact. This is contested as there are a number of Listed and Locally Listed Buildings within and 9 adjacent to the site. A major industrial employment site cannot possibly protect and/or enhance these historic buildings some of which are surrounded entirely by the proposed allocation area. The proposed industrial/warehouse use is fundamentally in conflict with the listed buildings and no amount of good design, landscaping and screening will protect and enhance these buildings as claimed on page 330 of the SA.</p> <p>2.23. Whilst the site is geographically close to Gatwick Airport and the M23 there is no obvious connection to the strategic road network which is crucial for the industrial/warehouse use proposed. The stated ‘possible positive’ impact for SA Objectives 7 and 9 are therefore disputed for the reasons set out in the Transport section of this consultation response. Assessment of Policy Options</p> <p>2.24. The policy options assessed for Policy EC4 (p181-183) compare the policy mechanisms for allocating a Strategic Employment Location. The removal of safeguarded land for the proposed ‘Gatwick Green’ allocation is contrary to national aviation policy (APF) and the NPPF (para 104). It cannot therefore be an appropriate strategy and is lacking in evidence to justify it in any event. There is no certainty that the removal of this large area of safeguarded land would not impact on the sustainability of development at Gatwick. Nor is there any evidence that the allocation would not damage the national and regional economy as well as the local economy through the loss of significant positive employment opportunities that would arise from a nationally significant infrastructure scheme. This is set out in detail in ‘soundness’ section of this response.</p> <p>2.25. Unfortunately, the assumption of CBC that a 47.3ha area of safeguarded land can be removed and allocated for employment use without prejudicing the delivery of a second runway is not supported by any evidence and the chosen policy option for GAT2 is therefore unjustified and contrary to national policy. This assumption undermines the entire sustainability appraisal as it does not recognise the likely significant impacts of removing a large area of safeguarded land or consider reasonable alternatives to meeting employment needs other than within the borough boundary or the narrowly defined sub region.</p>

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			<p>2.26. The result of the above assumption made by CBC is that the SA contains errors in the assessment of the 'Gatwick Green' site and GAT2 policy options which have resulted in the inclusion of 'Gatwick Green' as an allocated site rather than being correctly rejected. Its rejection should then lead to a review of scenarios for the 'Spatial Strategy and Vision' of the Local Plan by focusing Duty to Cooperate on a wider geographical area to meet employment needs.</p> <p>2.27. The SA does not properly assess the impacts of removing a large area of safeguarded land which results in chosen policy options that do not secure the objectives of the local plan, The SA therefore fails the legal compliance test.</p> <p>Suggested Modifications:</p>

**APPENDIX E: SUMMARY OF THIRD PUBLICATION CONSULTATION
RESPONSES (May – June 2023)**

**Further Publication Consultation (Regulation 19) 9 May – 20 June 2023
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Ref. No.	Respondent	Policy/ Para	Comments
REP/044 (2023)	HX Properties Ltd. (Agent: Tim North Associates)	SA	<p>Dear Sirs</p> <p>Crawley Borough Local Plan 2024 – 2040: Submission Consultation Draft May 2023</p> <p>My clients, HX Properties Ltd, raised representations objecting to Policy EC6 of the Regulation 18 and 19 versions of the same emerging Local Plan Review, concerned with “<i>Hotel and Visitor Accommodation</i>”, on the basis that the policy at the time was found to be unsound because it had not had regard to the implications surrounding airport related passenger car parking.</p> <p>Policy EC7 of the Crawley Borough Local Plan 2024-2040 Submission Consultation Draft May 2023 (hereinafter referred to as CBLP 2024-2040) is the latest iteration of earlier versions of the policy relating to “<i>Hotel and Visitor Accommodation</i>”. HX Properties Ltd object to Policy EC7 on the grounds that it is also unsound for the reasons set out in these representations. These representations should be taken as superseding those submitted to your Council under Regulation 19 Consultation on 28th February 2020.</p> <p>The basis behind the earlier Regulation 18 & 19 versions of the same Local Plan Review was to provide a sequential test for hotel and visitor accommodation outside the town centre, whilst at the same time permitting the same uses on the Manor Royal Main Employment Area, where it could be demonstrated that the development caters specifically for the needs of Manor Royal. The earlier iterations of the same policy sought to restrict parking at new hotels and visitor accommodation to that solely in use for staff and guests in residence at the particular development, and not to be used for any other purpose, including long term off-airport car parking.</p> <p>At the time of the Regulation 19 Consultation, my clients agreed with the underlying purpose of what was then the first paragraph of Policy EC6 which relied upon the sequential test in accordance with the NPPG on “<i>Town Centres and Retail</i>”, where the underlying aim is to guide main town centre uses towards town centre locations first, and then if no town centre locations are available, to edge of centre locations and, if neither town centre locations or edge of centre locations are available, to out of centre location (with preference for accessible sites which are well connected to the town centre).</p> <p>Your Council accepts “<i>Hotel and Visitor Accommodation is identified in the NPPF as a main town centre use, and is subject to the sequential test</i>”, yet seeks to depart from the underlying purpose of the sequential test concerning “<i>Hotel and Visitor Accommodation</i>” in Policy EC7 of the CBLP 2024-2040. In this respect, despite recognising that “... <i>Crawley hotels also serve a particular airport-related function for passengers, air crew and other airport users</i>”; Policy EC7 proceeds to state that “<i>Gatwick Airport is considered to represent a sustainable location for visitor accommodation</i>”.¹ In my clients view, your Council has conflated the importance to be attached to the sequential test, a significant factor at the present time given the well published decline of town</p>

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			<p>centres; and issues generally concerning sustainable development. If the two concept were the same, there would be no need for the sequential test.</p> <p>Your Authority has altered the policy on “<i>Hotels and Visitor Accommodation</i>” in Policy EC7 as part of the CBLP 2024-2040 so that the sequential test is exempt from being applied to hotel and visitor accommodation on land at London Gatwick Airport. My clients consider this approach to be unsound, especially when it is realised there is no requirement in Policy EC7 for on-airport hotels to show a demonstrable need.</p> <p>Put simply, if a demonstrable need is required for on-airport passenger car parking, the same must also apply to a mixed or composite use of hotel and airport related car parking, especially where one of the primary components of the same mixed or composite use, is airport related car parking. The contention advanced by my clients that on-airport hotels and visitor accommodation should be required to demonstrate a need before planning permission is granted, is given support through the wording of Policy EC7 : “<i>Car parking related to on-airport hotel development must meet the requirements of Policy GAT3</i>”.</p> <p>It is recognised that the Airport Owner and Operator enjoy permitted development rights in accordance with Schedule 2 Part 8 Class F of the Town & Country Planning (General Permitted Development) (England) Order 2015 (As Amended). However, as your officers will appreciate the phrase “operational building” is defined in Schedule 2 Part 8 Class O as meaning “<i>a building, other than a hotel, required in connection with the movement or maintenance of aircraft or with the embarking, disembarking, loading, discharge or transport of passengers, livestock or goods at a relevant airport.</i>” In short, hotels do not benefit from permitted development rights, reinforcing the point that not only should the sequential test be applied in accordance with national advice, but similarly so too should a demonstrable needs test be required to be met in respect of on-airport hotel development as part of Policy EC7.</p> <p>These issues are particularly important in that it is understood that your Authority has altered its position from one where it was previously contended that airport related car parking at hotels and guest houses comprised an ancillary use which did not constitute development requiring planning permission. That position is no longer applied, rightly in my clients’ view.</p> <p>It has also been noted that the change in approach towards hotel and visitor accommodation on land at London Gatwick Airport has resulted in a change to the</p> <p>SA/SEA relating to Policy EC7. Option 2 of the SA/SEA relating to Policy EC7 concerns a policy approach of providing dedicated hotel and visitor accommodation through locally specific planning guidance for such uses, including in the town centre, Manor Royal and Gatwick Airport. The same option, it is said, ensures consistency</p>

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			<p>with Policy GAT3, preventing the provision of airport-related parking in off-airport hotels and requiring on-airport hotels to comply with the requirements of Policy GAT3.</p> <p>What preferred Option 2 entails is that the most preferable location for hotel and visitor accommodation in terms of the sequential test, namely Crawley Town Centre, is to be regarded as an off-airport hotel site, where it meets the needs of passengers, air crew and others using the airport, at a time when the Government is seeking to encourage investment in town centres as a means of preventing their decline. Furthermore, where there is an absence of any qualifying conditions concerning on-airport hotels and visitor accommodation, can only mean that the same development is placed in a position of readily undermining the same uses in Crawley Town Centre, at the same time afforded preferential status to hotel provision on land at Manor Royal, where a demonstrable need is required to be shown on how the development will cater for the business needs of the Employment Area.</p> <p>In my clients' opinion that approach simply cannot be right at a time when hotels in Crawley Town Centre are meeting the needs of passengers, airport crew and others using London Gatwick Airport. Indeed, far from re-invigorating the vitality and viability of Crawley Town Centre; the preferred option in terms of Policy EC7 has the propensity to hasten its decline. It is contended by HX Properties Ltd that this approach is misguided, being a direct result of your Council prioritising the need to prevent all airport related car parking outside the boundaries of London Gatwick Airport, from taking place, to the extent of discouraging a form of development which Government policy seeks to support in town centre locations.</p> <p>To compound the issue, recent developments granted planning permission by your Council for hotels on-airport have been allowed without any car parking. The requirement to meet on-airport car parking associated with on-airport hotel development, in situations where no dedicated car parking is or will have been made available, will have a consequential impact on meeting other future on-airport car parking provision.</p> <p>In considering this matter, reference should be made to Application No. CR/2020/0707/NCC which was made pursuant to Section 73 of the Town & Country Planning Act 1990 (As Amended) and sought permission to allow the continued operation of the Hampton by Hilton Hotel, North Terminal, Gatwick Airport RH6 0PJ without complying with Condition No. 3 attached to the original planning permission Reference No. CR/2010/0692/FUL. Condition No. 3 attached to the earlier permission and the reason for its imposition are set out below:- <i>"3. The hotel shall not be occupied until the parking spaces shown on the submitted plans have been provided and constructed. The areas of land so provided shall not thereafter be used for any purpose other than the parking of customers' vehicles."</i></p> <p>The reason for imposing this condition read as follows:-</p>

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			<p><i>“To ensure that adequate and satisfactory provision is made for the accommodation of vehicles clear of the highways in accordance with Policy GC3 of the Crawley Borough Local Plan 2000.”</i></p> <p>Interestingly, one of the factors advanced on behalf of Gatwick Airport Ltd to justify an absence of any dedicated car parking associated with the Hampton by Hilton Hotel, a consideration which was accepted by your Council, read as follow:-</p> <p><i>“The Hilton by Hampton Hotel would not be alone in not having any designated parking. The 245-bedroom bloc hotel at South Terminal (permitted in 2012) has no parking, nor has any parking been required as part of a recent (2019) permission for its extension. The 46-room “Yotel” at South Terminal similarly has no car parking.”</i> (my emphasis)</p> <p>It can be seen that the proposition that hotel development on-airport is required to have its own on-airport parking for guests has simply not been adhered to by your Authority. On the contrary, by allowing no dedicated car parking in associated with on-airport hotels is simply a recipe for exacerbating problems relating to on-airport parking supply generally. This is particularly the case where as a consequence of the Hampton by Hilton Hotel having no dedicated car parking, and due to GAL’s intention to redevelop what was Car Park M, including the area used for parking by Hampton by Hilton Hotel, its provision was subsequently decanted into Multi Storey Car Park 7 where some 60 spaces were intended to be made available for its use.</p> <p>The approach adopted by your Council towards car parking provision associated with off-airport hotels is contrary to the reasoned justification set out in paragraph 9.89 of the CBLP 2024-2040 where it is concerned with Policy EC7, viz:</p> <p><i>“9.9 Hotels are an NPPF main town centre use, and support Town Centre’s vitality and viability the Town centre is the preferred location for hotel and visitor accommodation, as it is here where linkages with shops, restaurants and other main town centre uses can best be facilitated.”</i></p> <p>In SA/SEA terms, two further options should have been explored in terms of Policy EC7 with regard to hotel and visitor accommodation. The first of these two additional options is where preferential treatment in terms of location for hotel and visitor accommodation is provided in Crawley Town Centre in accordance with the sequential test, and in Manor Royal, but only where it can be demonstrated that the scale and function of hotel and visitor accommodation would not undermine the established business role of Manor Royal. The second of these two further options is to permit hotel and visitor accommodation on-airport, where a demonstrable need can be shown to exist for such use, and where there are no more sequentially preferable locations available.</p> <p>Policy EC7 is however unsound for other reasons, in that it seeks to permit hotels and visitor accommodation on land at Manor Royal, subject to it catering for the business needs of the same employment area, and being used solely for staff and guests in residence of the development. Policy EC3 is specifically concerned with Manor</p>

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			<p>Royal, with the reasoned justification set out at paragraph 9.47 outlining those complementary business facilities and staff amenities needed to support the day-to-day requirements within the employment area, with no account taken of hotel or visitor accommodation. In this way the two policies are incompatible in respect of the significance afforded to hotel and visitor accommodation.</p> <p>Policy EC7 fails to take into account that there many hotels in the vicinity of London Gatwick Airport which use their car parks as a temporary drop off facility in connection with a long term off-airport car parking provider, where cars are moved to an alternative location, whether on or off-airport, pending the customers return to the hotel from a holiday or business trip.</p> <p>The Car Parking Management Plan relating to a proposal to construct extensions and convert areas of the existing Ibis Gatwick Hotel, London Road, Northgate, Crawley West Sussex to create 57 additional rooms, resulted in a reduction in car parking spaces on the same land from 73 to 33. This was accepted by your authority, and is an example of the measures taken by a hotel in order to avoid a material change of use occurring, from a primary use as a hotel to a mixed or composite use as a hotel and for long term off-airport car parking purposes (Crawley Borough Council Ref No CR/2016/0580/ FUL refers).</p> <p>The approved Car Parking Management Plan is simply one example which has unintended consequences, in that hotel guests are provided with a number of choices of how to ensure that their vehicle is not left at the Ibis Gatwick Hotel during their leisure or business trip, being kept elsewhere, either at an on or off-airport parking site. This approach clearly has obvious benefits to the Ibis Gatwick Hotel in terms of an increase in the number of rooms and hence revenue stream, at the same time intensifying reliance and therefore need for all kinds of on and off-airport car parking facilities able to cater for the hotel's car parking requirements.</p> <p>Schemes of this nature also have a consequential impact on future supply considerations for various types of on and off-airport car parking, with associated implications when considering public transport modal share requirements in the context of the May 2022 Section 106 Legal Agreement, and October 2022 ASAS. In the case of Gatwick Airport Ltd, they also benefit from this process in the event that the car is parked on-airport.</p> <p>In circumstances where hotel guests are prevented from leaving their vehicle at the particular hotel for the duration of their leisure or business trip in order to avoid a material change of use occurring involving long term passenger related car parking, has itself unintended consequences. It means that additional trips are involved transporting the passenger's car to an alternative location which may be either on or off-airport during the passenger's trip, before their vehicle is returned to the hotel awaiting their arrival. In my clients' view this process also has the propensity to exacerbate unauthorised long term off-airport car parking, of no benefit to the Council or operators of lawful long term off-airport car parking sites.</p>

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			<p>In previous appeal decisions regarding long term off-airport car parking, your Authority has accepted that unauthorised car parking provides a constituent part of airport related passenger parking supply which is likely to continue into the future.</p> <p>For the reasons contained in these representations Policy EC7 is considered unsound; is inconsistent with Policy GAT3 and has implications for airport related car parking generally from a wider sustainability perspective, especially where it concerns hotel and visitor accommodation.</p> <p>Suggested Modifications:</p>
REP/044 (2023)	HX Properties Ltd. (Agent: Tim North Associates)	SA/SEA GAT3	<p>Dear Sirs</p> <p>Crawley Borough Local Plan 2024-2040: Submission Consultation Draft May 2023</p> <p>My clients, HX Properties Ltd, object to the assessment carried out in the Sustainability Appraisal/Strategic Environmental Assessment (hereinafter referred to as SA/SEA) dated May 2023 accompanying the Submission Consultation Draft Version of the Crawley Borough Local Plan 2024-2040 (hereinafter referred to as the CBLP 2024-2040), where it relates to Policy GAT3.</p> <p>It is contended that the SA/SEA is deficient and unsound where the appraisal concerns Policy GAT3. There is a duty to carry out a legally adequate SA/SEA in order to comply with the EU Strategic Environmental Assessment Directive 2001/42.</p> <p>The SA/SEA must consider Policy GAT3 and “reasonable alternatives” to it, with Article 5 of the Directive setting out the requirement to identify, describe and evaluate the likely significant environment effects of “reasonable alternatives”. These provisions have been transposed into UK law through the Environmental (Assessment of Plans and Programmes) Regulations 2004, Regulation 12 being involved in the preparation of an environmental report.</p> <p>It is contended that additional “reasonable alternatives” to Policy GAT3 exist, which have not been evaluated by the Local Planning Authority, which it is argued represents a fundamental flaw in the soundness of the assessment process. There is no obligation, as far as the law is concerned, to choose the most sustainable option, or the most sustainable of two policy options, since the requirements of the appraisal are entirely procedural [R (on the application of Friends of the Earth) v The Welsh Ministers (2015) EWHC 776 (Admin)] {12} and {75}.</p> <p>Reasons must, however, be given for the rejection of “reasonable alternatives” so that consultees are able to know what those reasons are. (Save Historic Newmarket Community v Forest Heath District Council (2011) EHC 606).</p>

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			<p>In the case of the Submission Consultation Draft version of the CBLP 2024-2040, two alternative policy scenarios have been considered.</p> <p>Option 1 is the provision of additional or replacement airport-related car parking which will only be permitted where it is (i) located within the airport boundary; and (ii) it is justified by demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport within the airport boundary. Option 2 is to allow for the provision of additional or replacement airport-related car parking within the airport boundary provided it is justified by a demonstrable need.</p> <p>Option 2 does not proceed to qualify what is meant by demonstrable need, as is the case with Option 1, although the Commentary where it relates to Option 2 refers to the Section 106 legal agreement, including the requirement to provide sufficient, but no more on-airport car parking spaces than necessary to achieve a combined on and off-airport supply that is proportionate to 48% of non-transfer passengers choosing to use public transport for their journeys to and from the airport by 2024.</p> <p>To the extent that the Submission Draft Plan extends to a period from 2024 to 2040, no reference is made in either Option in the Submission Consultation Draft version of the CBLP 2024-2040 to the latest published ASAS 2022-2030 which includes a target seeking to achieve 52% of passenger journeys to the airport by public transport by 2030, as part of meeting a target of 60% by sustainable modes and ultra-low or zero emission vehicles.</p> <p>Furthermore, no reference is made in either Option in the same document to airport related car parking involving the Northern Runway project for which a DCO application is expected to be submitted imminently to the Secretary of State at the time of writing these representations.</p> <p>The SA/SEA as part of the statutorily adopted Crawley Borough Local Plan 2015-2030 considered two options in respect of the predecessor version of Policy GAT3, namely Option 1 which was to provide additional car parking within the airport boundary, and Option 2 to allow car parking in other areas.</p> <p>Option 1 in the CBLP 2024-2040 has the same intention as Option 1 relating to the same policy where it concerns the statutorily adopted Crawley Borough Local Plan 2015-2030.</p> <p>Option 2 in the CBLP 2024-2040 also has the same underlying aim as Option 2 in the statutorily adopted Crawley Borough Local Plan 2015-2030.</p> <p>The latter becomes evident from the High Court judgment <i>Holiday Extras Ltd v Crawley Borough Council</i> (2016) EWHC 3247 (Admin) delivered on 30th November 2016 relating to the Section 113 challenge to the SA/SEA concerning Policy GAT3, wherein the Planning Policy Manager for the Borough Council is recorded as stating</p>

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			<p>that Option 2 was a relaxation of Policy GAT3 by “replacing the priority for the airport with a policy which would allow on and off parking to meet needs.” {14}</p> <p>The SA/SEA comprising part of the CBLP 2024-2040 considers both policy options against ten sustainability objectives. Sustainability objectives 1 to 8 inclusive set out in the SA/SEA dated December 2015 are precisely the same as the sustainability objectives against which Policy GAT3 of the CBLP 2024-2040 has been assessed. Sustainability objectives 9 and 10 where they relate to the SA/SEA dated December 2015 concerning the adopted Local Plan have subsequently been amalgamated to produce one sustainability objective 9 in the SA/SEA of the CBLP 2024-2040.</p> <p>In effect, what were previously sustainability objectives 9 and 10 namely “To promote active cohesive and socially sustainable communities” and “To ensure everyone has the opportunity to participate in sport and to encourage active, healthy and independent lifestyles” respectively, have now been amalgamated into a single sustainability objective 9 where it forms part of the latest version of the SA/SEA concerning Policy GAT3 in the Submission Consultation Draft May 2023, viz: “To ensure healthy, active, cohesive and socially sustainable communities. To ensure all benefit from a good quality of life., To ensure everyone has the opportunity to participate in sport and to encourage active lifestyles.”</p> <p>It follows that the SA/SEA methodology has not materially changed between that relied upon in the adopted Crawley Borough Local Plan 2015-2030 where it relates to Policy GAT3, and that which forms the basis to the Submission Consultation Draft 2024-2040 where it concerns the same policy.</p> <p>This being the case, and given that the two policy options are virtually identical between the two SA/SEAs; no reasoned justification has been advanced as to why the scores in respect of the Submission Consultation Draft May 2023 SA/SEA where it relates to Policy GAT3 has now changed.</p> <p>In the SA/SEA dated December 2015 relating to the adopted Crawley Borough Local Plan 2015-2030, the two options concerning Policy GAT3 scored identically in respect of all ten sustainability objectives. It is therefore surprising that when the same two options in the latest version of Policy GAT3 are examined in the context of the SA/SEA relating to CBLP 2024-2040, different scores are recorded, particularly in respect of Option 2. Sustainability objectives 1 and 2 concerned with the need to minimise climate change, and adapt to climate change respectively, both scored a single minus, (i.e. having a negative impact on the sustainability objective) in respect of both options relating to Policy GAT3 of the adopted Local Plan.</p> <p>The scoring has now been altered in the Submission Consultation Draft May 2023 where it concerns Policy GAT3. Sustainability objectives 1 and 2 now score a double minus (significant negative impact on the sustainability objective) where it relates to both Options 1 and 2.</p>

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			<p>Similarly, in respect of sustainability objective 6 which relates to conserving and enhancing biodiversity and landscape, Options 1 and 2 of the Submission Draft May 2023 both score a possible negative or slight negative impact where previously as part of Policy GAT3 in the adopted Local Plan they had a neutral impact. Similarly in the case of promoting sustainable journeys forming sustainability objective 7, Option 1 of the latest version of the SA/SEA now scores a single minus, being a negative impact; whilst Option 2 scores a double minus, being a significantly negative impact.</p> <p>It is alterations of this nature at times when circumstances have not fundamentally changed and the sustainability objectives remain identical, which casts doubts on the veracity of the entire SA/SEA process. All other sustainability objectives score identically between the two SA/SEAs where they relate to Policy GAT3 in the Submission Consultation Draft May 2023.</p> <p>My clients find that the SA/SEA concerning Policy GAT3 in the CBLP 2024-2040 to be deficient and unsound for other reasons. Firstly, Option 1 where it forms part of the CBLP 2024-2040 allows for additional or replacement airport-related car parking, subject to two criteria. The second criterion is that it is justified by a demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport within the airport boundary.</p> <p>It is a matter of fact that GAL are able to rely on the provisions of Schedule 2 Part 8 Class F of the Town & Country Planning (General Permitted Development) (England) Order 2015 (As Amended). The Airport Owner on “Operational Land” irrespective of the nature of the on-airport related car parking product, does not require express planning permission and therefore do not have to justify “a demonstrable need in the context of proposals for a chieving a sustainable approach to surface transport access to the airport within the airport boundary.” The same proposition equally applies to Option 2 in cases of additional or replacement airport related car parking within the airport boundary.</p> <p>Secondly, it is recognised that a proportion of non-transfer passengers will choose to access the airport by private car in both options. To the extent that both options are required to accord with the Section 106 legal agreement, namely to provide sufficient but no more on-airport car parking spaces than necessary to achieve a combined on and off airport supply that is proportionate to 48% of non-transfer passengers choosing to use public transport for their journeys to and from the airport by 2024, means that the same provisions apply irrespective of whether the application is concerned with an on-airport or off-airport location. In short, the Section 106 legal agreement is not solely concerned with on-airport car parking spaces in terms of meeting public transport journeys.</p> <p>Thirdly, there is no evidence to justify the proposition that allowing airport related parking in off-airport locations either has or is likely to encourage users to access London Gatwick Airport by car and increase the number of</p>

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			<p>trips and distance travelled by the vehicle to and from the airport. There is an distinct absence of any research proving that a long term off-airport car parking use has prevented the modal share in favour of public transport at an airport from being reached, whether expressed as a target in an ASAS or in a Section 106 Planning Obligation. On the contrary, the 48% public transport target referred to in the Section 106 Planning Obligation was exceeded in the fourth quarter of 2017 in accordance with CAA’s O & D Survey.</p> <p>It is contended that there are materially different forms of long term off-airport car parking. The traditional “park and ride” model involves a site with available reception facilities and compound areas where cars are blocked parked, with a courtesy mini bus or coach transferring the passengers to the airport terminals. The reverse occurs when the passenger returns, when they are picked up by the courtesy bus or coach and transferred back to the long term off-airport car parking facility to collect their car. The mini buses or coaches in such circumstances are normally replaced every three to four years, so there is the added benefit of the means of transportation relied on being the most efficient in terms of air quality and carbon emissions.</p> <p>This important factor however is not reflected in the scores where it relates to sustainability objectives 1 and 2. Fourthly, there is no justification to conclude that the provision of airport related parking in off-airport locations can detract from biodiversity and landscaping as a consequence of requiring hardstanding and lighting, and placing pressures on land which could be more beneficially used for other purposes.</p> <p>In both Options 1 and 2, the sustainability scores are identical, having a possible negative or slight negative impact, nullifying this statement. Whether the airport-related car parking is on-airport or off-airport necessitates hardstanding and lighting. Indeed, where there is a tightly drawn airport boundary as is the case with London Gatwick Airport, places pressure on land which could be more beneficially used for other airport-related activities. It is for these reasons that it is contended Option 2 does not amount to a “reasonable alternative”.</p> <p>A more appropriate alternative would be what is referred to as Option X, which is the provision of additional or replacement airport related car parking within the airport boundary; along with airport related park-and-ride provision outside the airport boundary, which in the case of the latter, is justified by a demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport.</p> <p>In the case of Option X, it is contended that the sustainability objective scores would, at their worse, be no different from the sustainability scores set out in Option 1 of the SA/SEA relating to the Submission Consultation Draft May 2023, irrespective of whether a possible reassessment of sustainability objective 6 is undertaken. The importance of introducing Option X is that neither Option 1 nor Option 2 considers the impact of the Northern Runway proposal envisaged to take place during the period governed by CBLP 2024-2040. There is uncertainty surrounding the ability of GAL to provide sufficient on-airport car parking to cater for the increase in passenger throughput to the airport envisaged as part of the forthcoming DCO application, irrespective of the intention of</p>

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			<p>meeting a target of 60% of passenger journeys by sustainable modes and ultra-low or zero emission vehicles. The airport would find itself in particular difficulties in circumstances where lawful long term off-airport car parking sites were not available in providing a choice for airport passengers. In this regard reference should be made to a report published by the Civil Aviation Authority in December 2016 entitled “Review of Market Conditions for Surface Access at UK Airport – Final Report”, which focused on two main topics:</p> <ul style="list-style-type: none"> • To understand the market structure for surface access, in particular how competitive conditions for road and forecourt access at individual UK airports affect outcomes for consumers. This included interaction between airport operators and surface access providers such as independent car parking operators, taxi/mini cab operator, bus operators and car hire operators; and • Transparency in terms of the extent to which consumers are well informed about the options they have to access UK airports and the prices for them. This included how surface access products and distributed. The report concluded: <ul style="list-style-type: none"> ○ Different passengers have different needs and preferences and not all modes will be perfect substitutes. Therefore, a situation where there is more than one competing provider of each mode, or at least the possibility of new entry would provide choice to passengers compared to a situation where passengers have to rely solely on competition between modes. ○ Some aspects of this sector may potentially give rise to risks to consumers in terms of choice and value for money. ○ Airport operators tend to control a large proportion of the facilities needed to run surface access operations, both at the forecourt and in surrounding areas (such as land suitable for car parks, surface transport interchanges, etc). Airport operators also provide many surface access products directly to consumers, often in competition with independent operators who require access to the airport’s facilities. Airport operators are therefore active in both the provision of facilities (upstream) and in the service itself (downstream). ○ Surface access is one of the few areas where airport operators have a direct relationship with consumers. This may serve to strengthen the position of the airport operator, as passengers are less likely to have bargaining power that airlines and retailers who engage in commercial negotiations with airport operators. <p>The park-and-ride model has added benefits of resulting in fewer journeys to the airport, through taking advantage of low emissions vehicles, whilst at the same time reducing congestion on local roads near the airport and thereby improving air quality; compared with the case where the equivalent number of passengers</p>

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			<p>relying on the private car would otherwise travel directly to London Gatwick Airport and then park on-airport. This benefit occurs irrespective of whether the passenger’s car is an ultra-low or zero emission vehicle.</p> <p>In addition, long term off-airport car parking operators make an important contribution to the economy through the provision of jobs. This “reasonable alternative” would rely on mitigation of the same negative impacts as Option 1 in the SA/SEA relating to the Submission Consultation Draft May 2023. It also takes into account that the planning system should be seen to operate in the public interest of local communities and the region as a whole, encompassing the present as well as future needs of society. It does not exist to protect the private interest in terms of one person against the activities of another, although private interest may coincide with the public interest in some cases.</p> <p>It follows there is a need to re-evaluate the SA/SEA relating to the CBLP 2024-2040 where it relates to Policy GAT3 and a re-appraisal of reasonable alternatives, if the same process is not to be considered unsound.</p> <p>Suggested Modifications: eA re-evaluation of the SA/SEA relating to the CBLP 2024-2040 where it relates to Policy GAT3 and a re-appraisal of reasonable alternatives with a new Option X as per attached letter dated 20th June 2023 from Tim North & Associates Ltd</p>
REP/055 (2023)	Gatwick Green Ltd (The Wilky Group)	Sustainability Appraisal & Strategic Environmental Assessment	<p>1.0 Introduction</p> <p>1.1 This representation is submitted on behalf of Gatwick Green Limited (GGL). For clarification, Gatwick Green Limited is a wholly owned subsidiary of The Wilky Group (TWG), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. Previous representations were submitted by TWG, but the land is now vested in Gatwick Green Limited. This representation relates to the draft Sustainability Appraisal / Strategic Environmental Assessment¹⁸ (SA/SEA), a legal requirement that supports the Draft Crawley Borough Local Plan, 2023 (DCBLP).</p> <p>1.2 GGL owns about 48 ha (119 acres) of land east of Gatwick Airport. The land has been promoted by GGL as a strategic employment opportunity known as Gatwick Green, most of which forms a proposed allocation as a Strategic Employment Location (SEL) of 44 ha (108.7 acres) under Strategic Policy EC4 in the DCBLP. The proposed allocation is for a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8.</p> <p>1.3 This representation notes that the SA/SEA has been prepared in accordance with the advice in the Planning Practice Guidance (PPG), and that the outcomes of the evaluation of options in relation to Strategic Policies EC1 and EC4 and Policy GAT2 and other policies are the right outcomes and supported.</p>

¹⁸ Crawley Borough Council Local Plan Review | Sustainability Appraisal / Strategic Environmental Assessment, Draft Report, For the Submission Local Plan, May2023

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			<p>2.0 Strategic Policy EC1</p> <p>2.1 The Council has assessed the alternative options for Strategic Policy EC1 in relation to addressing the unmet economic and employment land needs of the Borough in its Sustainability Appraisal (SA/SEA - pages 230-233). This evaluated three options: (1) rely on the NPPF to direct economic growth to the most appropriate and sustainable locations, (2) plan only for the level of need that can be accommodated within the main employment areas and work with neighbouring authorities to accommodate any unmet growth, and (3) adopt a spatial approach that recognises the role of Crawley as a sub-regional location and plan positively to meet economic growth needs by maximising the use of land in the existing employment areas, small extensions to Manor Royal and the allocation of Gatwick Green to meet Crawley’s significant industrial and warehouse land requirements.</p> <p>2.2 Option 3 was selected as the most sustainable spatial option as it recognises Crawley as a key sub-regional centre and plans positively to meet its economic growth needs within the borough. The SA/SEA summarises the merits of Options 3 as follows (page 233): “...the approach will enable Crawley to respond to market signals, planning for the specific sectors where growth is identified, and support continued economic recovery from the current economic recover from the Covid-19 pandemic. In identifying new business land, the approach will help to retain and attract business and investment, both to Crawley and the wider functional economic market area. In doing so, the approach responds to NPPF requirements to plan positively for economic growth, and reinforcing and strengthening Crawley’s economic role, and that of the wider area.”</p> <p>2.3 This analysis is reflected in Topic Paper 5¹⁹ (Employment Needs and Land Supply, May 2023). The findings of the SA/SEA in relation to Strategic Policy EC1 are fully supported. The conclusions remain valid in the light of GGL’s objections to Strategic Policy EC1 and the suggested change to identify a higher employment land need figure.</p> <p>3.0 Strategic Policy EC4</p> <p>3.1 The Council assessed the high-level alternative options in relation to Strategic Policy EC4 for providing for an Strategic Employment Location (SEL) (pages 238-239). This evaluated three options: (1) allocate a SEL only though Strategic Policy EC1, (2) allocate a SEL though a dedicated local plan policy that sets out the site-specific requirements for the site, and (3) explore the scope to allocate an industrial-led SEL through an Area Action Plan.</p> <p>3.2 Option 2 was selected as it allowed for detailed matters relating to the amount and type of business floorspace, transport and access, design and amenity and environmental considerations to be addressed</p>

¹⁹ Topic Paper 5: Employment Needs and Land Supply, Crawley Borough Council, May 2023

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			<p>in policy and provide a framework to achieve a sustainable development through a masterplan and planning application. The Council's approach is supported in that it has allowed for the Gatwick Green SEL to be identified as part of the overall economic strategy for the Borough articulated in Strategic Policy EC1, with the detailed matters relating to site / development requirements to be addressed separately in a site-specific policy (Strategic Policy EC4).</p> <p>3.3 The findings of the SA/SEA in relation to Strategic Policy EC4 are fully supported. The conclusions remain valid in the light of GGL's objections to Strategic Policy EC4.</p> <p>4.0 Policy GAT2</p> <p>4.1 The Council has assessed the alternative options in relation to Safeguarded Land in its Sustainability Appraisal (SA/SEA) (pages 250-252). This evaluated three options: (1) safeguarding land as shown in the Gatwick Airport Master Plan²⁰ (GAMP), (2) do not safeguard any land, and (3) safeguard land with an amended boundary to allow for strategic employment provision. Option 3 was selected as the most sustainable option as it responded to national policy to retain safeguarding, but with an amended boundary to accommodate Crawley's unmet employment land needs in the form of a SEL at Gatwick Green. This approach enabled land south of the airport required to accommodate the physical land take of a possible wide-spaced runway and its operations to be retained. The approach was based on the following analysis (page 252): <i>"The council does not consider parking to represent an efficient use of the site, particularly given the significant employment needs of Crawley borough, and is of the view that the airport could accommodate parking more efficiently through decked and robotic parking and other efficiency measures, should it be demonstrated that additional on-airport parking is required having regard to the airport's surface access obligations stated in the S106 legal agreement. This approach, which retains safeguarding with an amended boundary to allow strategic employment provision, is considered to represent the most sustainable option"</i></p> <p>4.2 This analysis is reflected in Topic Paper 2 on Gatwick Airport²¹. The findings of the SA/SEA in relation to Strategic Policy GAT2 are fully supported.</p> <p>5.0 Other policies</p> <p>5.1 The SA/SEA also contains comparative evaluations of the options with regard to sustainable transport and infrastructure provision (Strategic Policies ST1 and IN1). In relation to these evaluations, the SA/SEA concluded in favour of locally-specific policies on sustainable transport and infrastructure over relying on the NPPF (the 'do nothing' option). Both evaluations demonstrated significantly more benefits for a</p>

²⁰ Gatwick Airport Master Plan 2019, Gatwick Airport Limited, xx 2019

²¹ Topic Paper 2, Gatwick Airport, Crawley Borough Council, May 2023

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			<p>detailed locally-specific policy over the ‘do nothing’ option. On this basis, it is considered that there is an overwhelming and sound case in support of these policies.</p> <p>6.0 Conclusions</p> <p>6.1 Overall, the SA/SEA is legally compliant and GGL supports the Council’s findings with regard to Strategic Policies EC1, EC4, ST1 and IN1 and Policy GAT2</p> <p>Suggested Modifications:</p>
REP/058	Reigate & Banstead Council	SA	<p>Sustainability Appraisal / Strategic Environmental Assessment</p> <p>In our previous response (dated 30th June 2021) we expressed concern that the CBC draft Sustainability Appraisal (“SA”) fails on the grounds of legal compliance. The Council determined that for the proposed allocation Gatwick Green, an option for not allocating land to meet the identified B8 need was not addressed. Having further assessed the most recent draft SA (May 2023), Appendix F: Submission Local Plan Spatial Strategy Options and Appraisal, we note that this has been addressed under the overarching spatial policy EC1: Sustainable Economic Growth. Option 1 is for the reliance on the NPPF to ensure that identified economic growth is directed to the most appropriate and sustainable locations. This is deemed as not directly allocating land and therefore we view this as addressing the option of not allocating land to meet B8 usage need. As a result, we would like to withdraw our previously written statement on the SA in our previous response and we no longer find any issues on legal compliance in this case.</p> <p>Suggested Modifications:</p>
REP/061 (2023)	Historic England	SA	<p>We commented separately on the scope of the Sustainability Appraisal by letter dated 27 February 2020 and reiterated our views in our letter 29 April 2021; we are content that the SA report for the Crawley Local Plan adequately covers the issues that may arise in respect of the potential effects of proposed development sites on heritage assets.</p> <p>Suggested Modifications:</p>
REP/062	Environment Agency	Sustainability Appraisal / SEA	<p>Draft Sustainability Appraisal/SEA</p> <p>The SA/SEA recognises that flood risk is one of the Sustainability issues facing Crawley. Section A11 highlights the nature of the flood risk within the Crawley Borough, and the importance of this constraints being recognised in the Local Plan is welcomed, as it the importance of flood risk continuing to remain so in planning for Crawley’s future.</p> <p>Section A13 refers to the Strategic Flood Risk Assessment (SFRA). The SFRA is an important document in setting out the flood risk in the Borough and in outlining recommendations that should be considered in the identification of site allocations and the determining of planning applications. The current SFRA considers to be</p>

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			<p>fit for purpose, though by its very nature does represent a point in time. You should consider updating the SFRA when new information is available.</p> <p>Policies EP1, Development and Flood Risk, and EP2, Flood Risk Guidance for Householder Development and Minor Non-residential development, are related to how the flood risk in the Borough will be managed in terms of development planning.</p> <ul style="list-style-type: none"> • For Policy EP1, the choice of including a locally specific flood risk policy appears sound, as it better enables flood risk to be dealt with in a locally specific manner whilst strengthening the National Policy on development and flood risk. • For Policy EP2, the choice of including a specific policy detailing bespoke requirements for householder applications appears sound, as these types of application can result in a cumulative impact on flood risk though the nature and scale of supporting information should be proportionate to the development type. <p>Suggested Modifications:</p>
REP/113 (2023)	Natural England	SA/SEA	<p>Comments on local plan's Sustainability Appraisal (SA)</p> <p>We have no significant comments to make concerning your plan's SA.</p> <p>Suggested Modifications:</p>
REP/161	Resident 66	SA/SEA SDC1	<p>Adoption of BREEAM Standard instead of Passiv Haus standards of building</p> <p>BREEAM standards vary considerably between a 30% "Pass" to an 85% "Excellent". Nowhere does it specify the what level of BREEAM standard will be required. This conflicts with the Crawley Borough Council Climate Emergency Action Plan of 2021 which recommends Passiv Haus adoption. Passiv Haus standards are more specific and rigorous. They are also more limited in their breadth of cover.</p> <p>Suggested Modifications:</p> <p>Specify the minimum BREEAM standard.</p> <p>Also specify the use of the Passiv Haus standard.</p>

APPENDIX F: 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 come to the fore as awareness has grown of its potential effects and the council has declared a Climate Emergency. The government has recently made a commitment to Net Zero carbon emissions by 2050. 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 with climate change likely to increase flood risk in parts of the borough, further development may lead to increased run-off, there could potentially be an increased in flood risk if it is not managed appropriately. Crawley remains subject to serious water stress, meaning that the relationship between development and the available water supply must be carefully considered and planned for.
- 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.
- A3 Set out below are the key sustainability issues for the town.

Relevant Plans, Policies and Programmes

- A4 For the purposes of this draft SA/SEA report, 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 (MHCLG, 2021)
- National Planning Practice Guidance (MHCLG, Updated Regularly)
- A Green Future: Our 25 Year Plan to Improve the Environment (DEFRA, 2018)
- Town and Country Planning (Local Planning) (England) Regulations 2012
- Climate Change Act 2008 (2050 Target Amendment) Order 2019
- Gatwick Diamond Local Strategic Statement (Chilmark Consulting, 2017)
- Corporate Priorities 2023-2027 (CBC, 2023)
- Climate Emergency Declaration (CBC, 2019) and Motion Amending Targets within the Climate Emergency Action Plan (CBC, 2021)
- Crawley Borough Council Climate Emergency Action Plan (CBC, 2021)
- Carbon & Waste Reduction Strategy (CBC, 2010)
- West Sussex Plan 2017-2022 (2017)

Climate Change

- British Energy Security Strategy (BEIS, 2022)
- Climate Change Act (2008)
- Planning and Compulsory Purchase Act (2004)
- Planning and Energy Act (2008)
- National Planning Policy Framework (MHCLG, 2021)

- Net Zero Strategy: Build Back Greener (BEIS, 2021)
- Clean Growth Strategy (BEIS, 2017)
- Future Homes Standard – 2019 Consultation (MHCLG, 2019)
- BREEAM and the Code for Sustainable Homes (CfSH)
- Building Regulations Part L
- Crawley Carbon and Waste Reduction Strategy (CBC, 2012)
- Decentralised Energy Study for Crawley (Hurley Palmer Flatt, 2011)

Water

- The Conservation of Habitats and Species Regulations 2017
- Environment Act 2021
- National Planning Policy Framework, MHCLG (2021)
- Sussex North Water Neutrality Study Part C: Mitigation Strategy, JBA Consulting (November 2022)
- Water Neutrality Study Part B: In Combination Assessment, JBA Consulting (26 April 2022)
- Natural England Position Statement, Natural England (14 September 2021)
- Natural England Water Neutrality Advice Note (February 2022)
- Control Flow HL2024: Final Report on Crawley Borough Council Pilot (September 2022)
- Natural England’s Endorsement of SNOWS (November 2022)
- Natural England Addendum to Position Statement (November 2022)
- Local Plan Policy SDC4 Water Neutrality Further Proposed Modification (December 2023)
- Water Neutrality Study Part A: Individual Local Authority Areas (Crawley and Chichester) JBA Consulting (July 2021)
- Horsham Local Plan Water Neutrality Technical Note, Aecom (July 2021)
- Water Cycle Study – Crawley Addendum, JBA Consulting (January 2021)
- Gatwick Sub-Regional Water Cycle Study, JBA Consulting (August 2020)
- Securing a resilient future for water in the South East: Our Water Resources Management Plan for 2020-70, Southern Water (December 2019)
- Draft Water Resources Management Plan 2024 (Southern Water, 2022)
- Futureproofing our water supplies: a consultation on our Draft Regional Plan for South East England (Water Resources South East, 2022)
- Consultation on the Transposition of Article 6 of the Groundwater Directive (DEFRA, 2008)
- National Planning Practice Guidance (MHCLG, 2015)
- EU Water Framework Directive (2000/60/EC)
- Crawley Borough Council Strategic Flood Risk Assessment (SFRA) (JBA, 2023)
- Crawley Borough Council Strategic Flood Risk Assessment (SFRA) (JBA, 2020)
- Site Allocations & Flood Risk Background Paper (CBC, 2023)
- Site Allocations & Flood Risk Background Paper (CBC, 2020)
- West Sussex Lead Local Flood Authority (LLFA) Policy for the Management of Surface Water
- Thames River Basin District River Basin Management Plan (Defra, 2018)
- South East River Basin District River Basin Management Plan (Defra, 2018)
- Gatwick Sub-Region Water Cycle Study (Outline Study) (JBA, 2020)
- London Gatwick Airport Water Quality Management Action Plan 2009-2011
- Thames River Basin Management Plan
- Water Resources Management Plan 2019 (South East Water, 2018)
- Water Resources Management Plan 2019 (Thames Water, 2018)
- Water Resources Management Plan 2019 (Sutton and East Surrey Water, 2018)
- Annual Report and Accounts 2022, for (respectively) Southern Water, South East Water, SES Water
- Defra Water Conservation Targets Detailed Evidence Report (May 2022, 2018 and 2019)
- Written Ministerial Statement on Reducing Demand for Water (July 2021)

Noise

- The Environmental Noise Directive (2002/49/EC)
- Environmental Noise (England) Regulations (as amended)
- National Planning Policy Framework (MHCLG, 2021)
- Planning Practice Guidance: Noise (MHCLG, 2019)
- BS4142 + A1:2019 Method for Rating and assessing industrial and commercial sound
- BS8233 Guidance on sound insulation and noise reduction for buildings
- ProPG: Planning and Noise – New Residential Development (May 2017)
- 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, 2023)
- Gatwick Airport Noise Management Action Plan 2015-2018 (Gatwick Airport Limited, 2015)
- Gatwick Airport Noise Action Plan 2019-2024 (Gatwick Airport Limited, 2019)
- Manston Airport PA08 Decision Letter (2022)
- Environmental Noise and Effects on Sleep: An Update to the WHO Systematic Review and Meta-Analysis (Smith *et al*, 2019)
- 2040 Wide Spaced Summer Night Contours (Jacobs, 2014)
- Building Regulations Approved Document O: Overheating (HM Government, 2010)

Air Quality

- The Industrial Emissions Directive (2010/75/EU)
- National Emissions Ceiling (NEC) Directive (2016/2284/EU)
- National Planning Policy Framework (MHCLG, 2021)
- Planning Practice Guidance: Air Quality (MHCLG, 2019)
- Clean Air Strategy 2019 (DEFRA, 2019)
- The Air Quality Strategy for England, Wales, Scotland and Northern Ireland (DEFRA, 2007)
- Breathing Better: a partnership approach to improving air quality in West Sussex (2018)
- Air Quality and Emissions Mitigation Guidance for Sussex (Sussex Air Quality Partnership, 2020)
- Crawley Borough Council Annual Status Report on Air Quality (2021)
- Building Regulations Approved Document O (Overheating)

Waste and Minerals

- National Planning Policy Framework (MHCLG, 2021)
- Minerals: Guidance on the planning for mineral extraction in plan making and the application process (MHCLG, Updated Regularly)
- Waste: Provides further information in support of the implementation of waste planning policy (MHCLG, Updated Regularly)
- Waste Local Plan (West Sussex County Council, 2014)
- West Sussex Joint Minerals Local Plan (West Sussex County Council & South Downs National Park Authority, 2018)
- Government Review of Waste Policy in England (Defra 2011)

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

- A5 The estimated total net greenhouse gas emissions for the borough of Crawley during 2011 were 784 Kilo-tonnes CO_{2e}²². Within the gross total of 792 Kilo-tonnes the domestic contribution was 186 Kilo-tonnes CO_{2e} and industry/commercial/public sector 348 Kilo-tonnes (BEIS, Local Authority territorial greenhouse gas emissions estimates 2005-2020 (kt CO_{2e})). By 2020, the total net greenhouse gas emissions had fallen to 525 Kilo-tonnes CO_{2e}, with the 186 Kilo-tonnes CO_{2e} for domestic use falling to 131 Kilo-tonnes CO_{2e} and industry/commercial/public sector use falling to 177 Kilo-tonnes CO_{2e}.
- A6 Greenhouse gas emissions from transport (not including aviation) in Crawley fluctuated within the 220-250 kilo-tonne range for most of the period 2011-2020, as emissions from other sources declined, although 2020 saw a fall to 202 kilo-tonnes, which was probably partly associated with the Covid-19 restrictions. This meant that transport emissions increased as a proportion of Crawley’s total from 32 to 38 per cent of gross CO_{2e} emissions over the same period. Transport is a topic investigated further in Topic Area F.
- A7 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, low per capita emissions within the domestic sector, and the high proportion of people who both live and work in the borough, mean the overall per capita carbon emissions are still comparable with more rural districts within the county and wider region.

Table A1: Per capita CO_{2e} emissions for West Sussex by sector for 2020

Local Authority	Industry, commercial and public sector (kilo-tonnes)	Domestic (kilo-tonnes)	Transport (kilo-tonnes)	Total (kilo-tonnes)*	Population '000s (mid- year estimate 2020)	Per capita emissions (tonnes)
Adur	40	81	90	215	64.2	3.4
Arun	97	227	183	519	161.1	3.2
Chichester	191	202	251	678	121.5	5.6
Crawley	177	131	202	526	112.5	4.7
Horsham	127	221	234	660	145.5	4.5
Mid Sussex	120	224	240	615	152.1	4.0
Worthing	71	142	81	298	110.7	2.7
West Sussex Total	823	1229	1282	3511	867.6	4.0
South East Total	9149	12971	15539	40400	9217.3	4.4

Source: Local Authority territorial greenhouse gas emissions estimates 2005-2020 (kt CO_{2e}), BEIS, 2022

*Includes net effect of Land Use, Land Use Change, and Forestry, as well as emissions from agriculture and waste management. Figures therefore differ from combined commercial/ transport/ domestic total.

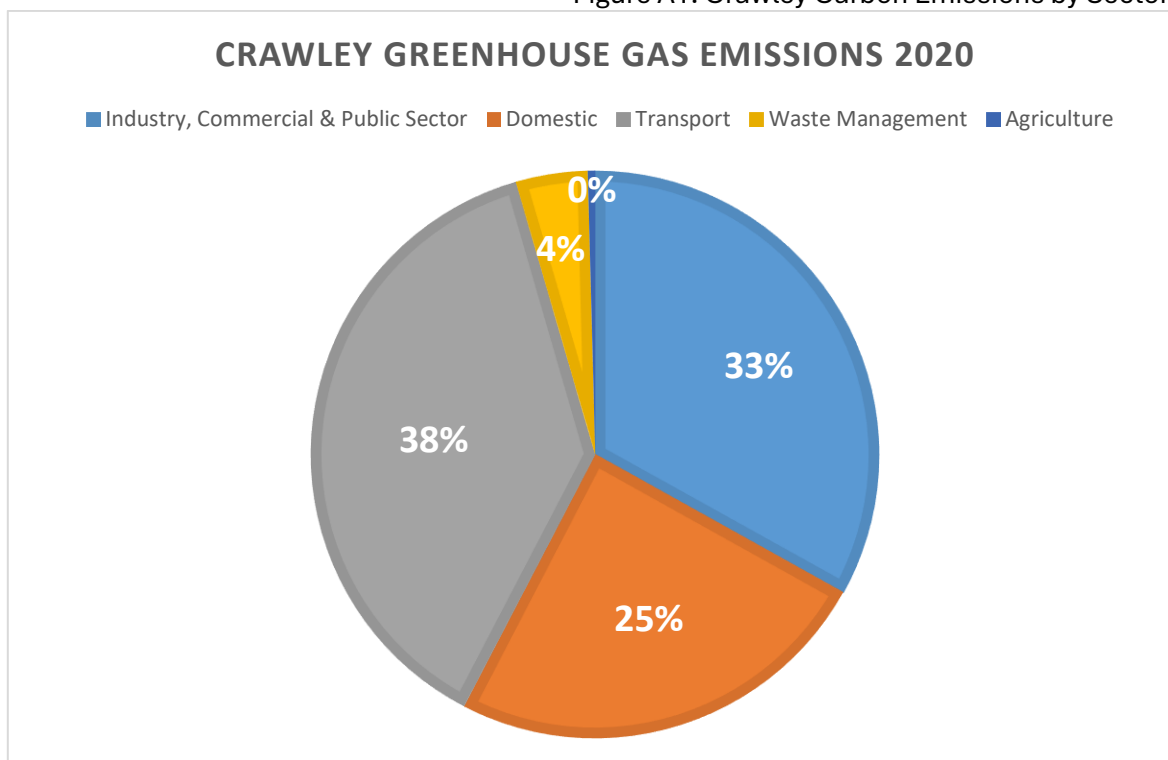
Table A2: CO_{2e} emissions trends 2010-2020 Crawley and the South East

	Total CO _{2e} emissions (tonnes per person)									
	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Crawley	7.4	7.5	7.2	6.3	6.1	5.8	5.6	5.7	5.4	4.7
West Sussex	6.0	6.1	5.9	5.3	5.1	4.9	4.7	4.8	4.5	4.0
South East	6.5	6.7	6.4	5.8	5.5	5.3	5.0	5.2	4.9	4.4

Source: Local Authority territorial greenhouse gas emissions estimates 2005-2020 (kt CO_{2e}), BEIS, 2022

²² These figures do not include emissions from aviation, which is not counted in local statistics.

Figure A1: Crawley Carbon Emissions by Sector, 2020



Likely evolution without the continued implementation of the Local Plan

A8 National legislation and standards for carbon emissions are likely to have an impact on reducing per-capita levels. These are expected to become more ambitious over the next few years in order to pursue the targets required by the 2015 Paris Agreement and the government’s target of reaching UK emissions to net zero by 2050. Failure by local authorities to take action using the policy levers available to them is nonetheless likely to increase the risk that these targets will not be met.

What the Local Plan can and cannot do

A9 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, sustainable modes of transportation, particularly in order to support compact development/increased residential densities, decentralised energy and renewable energy.

A10 While the scale of development anticipated in the Crawley area is likely to make a net contribution to CO₂ emissions, the Local Plan can aspire to reduce this to a minimum, preparing the ground for future advances which can eliminate the net increases associated with new development, and move it into reverse. The Local Plan can aspire to uncouple new development from increases in air pollution at this stage, and potentially reduce it.

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
A1	CO ₂ reduction from Local	In 2018/19 total greenhouse gas emissions arising from council activities stood at 35.0 million kg (4.6 million		Since 2014/15, the council has achieved a small fall in greenhouse	CBC Sustainability Team; CBC Authority Monitoring Report

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
	Authority activity	kg if procurement and staff commuting are excluded). For 2019/20 and 2020/21 the totals excluding procurement and commuting (which have not been calculated for those years) stood at 5.2 million kg and 3.8 million kg respectively. Under an earlier methodology, which included direct and some indirect emissions, calculated emissions amounted to 5.0 million kg in 2015/16, 5.3 million kg in 2016/17, and 4.6 million kg in 2018/19.		gas emissions (excluding procurement and staff commuting). The procurement and commuting total clearly represents a large proportion of total emissions associated with council activity, although the trend in these emissions remains unclear.	
A2	Per capita greenhouse gas emissions in the local authority area	2020: Domestic: 1.16 tonnes Industry: 1.57 tonnes Transport: 1.80 tonnes LULUCF: -0.07 tonnes Total Net Emissions: 4.7 tonnes per capita	2020 South East: Domestic 1.41 tonnes Industry: 0.99 tonnes Transport: 1.69 tonnes LULUCF -0.19 tonnes Total Emissions SE – 4.4 tonnes per capita	While the domestic figures compare favourably with the South East, total emissions are higher than the regional average due to a high contribution from industrial and commercial activity in the borough. However, Crawley's total net greenhouse gas emissions have decreased by 33% from 2011	Local Authority territorial greenhouse gas emissions estimates 2005-2020 (kt CO ₂ e), BEIS, 2022
A3	Quantity of Residual household waste collected per household;	525.1 kg per household in 2020/21		Mostly stable trend	ENV18 - Local authority collected waste: annual results tables (DEFRA, 2022)
A4	Proportion of household waste recycled or composted;	31.9 per cent in 2020/21		Recent increase in proportion of waste recycled/composted	Crawley Borough Council Authority Monitoring Report / ENV18 - Local authority collected waste: annual results tables (DEFRA, 2022)

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

- A11 Crawley's water environment has long been an important planning consideration, particularly from a perspective of managing flood risk, and will continue to remain so in planning for Crawley's future. The borough falls entirely within the upper reaches of the River Mole catchment, and the town's close proximity to the catchment has meant that several areas are identified by the Environment Agency as being at risk of flooding from this source. The northward flow of the Upper Mole towards the Thames also has flood implications for Gatwick Airport and neighbouring authorities, in particular Reigate and Banstead. River flooding is not the only source of flooding; Crawley is at the highest risk of surface water flooding in West Sussex. Sewer and groundwater flooding are also important planning considerations.
- A12 Crawley is affected by fluvial flooding from the upper reaches of the River Mole and its tributaries, including the Gatwick Stream, Tilgate Stream, Crawter's Brook and Ifield Brook. The Upper Mole Flood Alleviation Scheme, progressed by the Environment Agency, has delivered works at Worth Farm, Tilgate Lake, Grattons Park and Clay's Lake, and these are functioning as designed. [The borough is subject to flood risk from other sources, particularly surface water.](#)
- A13 The Strategic Flood Risk Assessment (2020) provides advice for the borough, including areas that are more susceptible to flood risk, and outlines recommendations that should be considered in the identification of site allocations and the determining of planning applications. [The Strategic Flood Assessment \(2023\) updates its predecessor, taking account of updated national guidance.](#)
- A14 The Gatwick Sub-Region Outline Water Cycle Study (2020) considers a range of matters relating to the water environment. It recommends that to reduce surface water flooding, the Local Plan should include policies that promote sustainable drainage techniques in all developments. As part of this policy approach, it is advised that redeveloped brownfield sites should not allow surface water drainage to the foul network.

Likely evolution without the continued implementation of the Local Plan

- A15 The adopted 2015 Local Plan contains a policy relating to flooding, and the Draft Regulation 19 Local Plan contains two dedicated Policies relating to flood risk. Updated evidence has been prepared through the Water Cycle Study (2020) and Strategic Flood Risk Assessment (2020 [and 2023](#)). Were the flood related policies to be lost, planning applications would still need to conform with national planning guidance, including the sequential and exception tests, and advice from the Environment Agency. However, the Local Plan policy and the SFRA provide locally specific advice to ensure that flood risk is appropriately considered at the local level, taking account of the local water environment and advice from the Environment Agency and Lead Local Flood Authority. The approach also enable a proportionate approach to be applied for householder developer and small non-residential extensions.

What the Local Plan can and cannot do

- A16 The NPPF and Planning Practice Guidance advocate a sequential approach that will guide the plan-making (i.e. allocation of sites) and decision-taking process (i.e. the determination of planning applications). In consultation with the Environment Agency and Lead Local Flood Authority, the Local Plan directs development, according to its vulnerability classification, away from areas that are at the greatest risk of flooding, ensuring that it is planned to minimise flood risk. By providing a framework through which the guidance and recommendations of the SFRA and Water Cycle Study can be implemented, the Local Plan will ensure that national policy can be applied having regard to the local flood context, and will therefore play an active role in

ensuring that development does not worsen, appropriately mitigates, and where possible reduces flood risk.

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
A5	Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds	No planning applications were granted contrary to Environment Agency advice on flooding and water quality grounds between 2017/18 and 2020/21.			Environment Agency Statistics

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

- A17 As mentioned in reference to the geographical scope of the SA, it is possible that future development within or adjoining Crawley, through increased population, may exacerbate water supply issues and associated water quality and infrastructure capacity issues. To ensure this issue is explored fully, alongside wider issues of water quality, biodiversity and waste water infrastructure capacity, an updated Water Cycle Study has investigated how best issues of water stress and water neutrality can be addressed.
- A18 The South East remains an area of serious water stress, this being a measure of the level of demand for water (from domestic, business and agricultural users) compared to the available freshwater resources. Water stress, unless carefully planned for, can cause deterioration of the water environment in both the quality and quantity of water, and consequently restricts the ability of a waterbody to achieve ‘good’ status under the Water Framework Directive. The Gatwick Sub-Region Water Cycle Study (2020) identifies water stress as a significant issue for Crawley. The Water Cycle Study outlines the need for the council to work alongside water infrastructure providers and statutory consultees in taking a pro-active approach in planning to address the identified serious water stress. Separately to this, advice from Natural England has set out that groundwater abstraction at Pulborough, which supplies the Southern Water Sussex North Water Resource Zone, including large parts of Crawley, may have an adverse effect on the integrity of the Arun Valley SAC, SPA and Ramsar features..
- A19 Crawley is partly served by the Southern Water Sussex North Water Resource Zone (WRZ) along with Horsham, part of Chichester and South Downs National Park, and a very small part of Mid Sussex. The LPAs within the Sussex North WRZ collectively propose to deliver nearly 20,000 houses supported by additional school places and employment land as part of their emerging Local Plans.

LPA	Number of houses within Local Plan period (without full planning permission)	Indicative number of employees
CBC	3,960	5,780
CDC	1,796	None identified in Sussex North
HDC	12,800	4,590
SDNP	1,244	345
Total	19,800	10,715

- A20 The Sussex North Water Supply Zone includes supplies from a groundwater abstraction which cannot, with certainty, conclude no adverse effect on the integrity of Internationally Designated Habitat sites. The Habitats Regulations require that development must be certain not to exacerbate these issues, meaning that (unless screened out) it must demonstrate that it is water neutral. The Water Neutrality Study outlines a strategy to achieve water neutrality within the

Sussex North Water Resource Zone, throughout the timeframe covered by the Local Plans of Crawley Borough Council, Chichester District Council, Horsham District Council, and South Downs National Park Authority (SDNPA). This will require a combination of water efficient design, and also an offsetting of the impacts of development within the water resource zone. Addressing the concerns regarding Crawley's water supply and internationally designated habitats is set out in Section 6 of this SA/SEA.

Likely evolution without the continued implementation of the Local Plan

- A21 The updated Water Cycle Study assesses whether, through the water companies' planned approach, sufficient water supply can be made available to support planned development of the Local Plan Review at Crawley up to 2040. Water Infrastructure providers are also required to produce Water Supply Management Plans identifying infrastructure capacity and water sources for the future. However, without the implementation of Local Plan policies to assist in reducing water stress, it may be challenging for water companies to reliably supply water without exacerbating the serious water stress or resulting in other environmental impacts.
- A22 Water Neutrality is required from all new development. The jointly commissioned Water Neutrality Study Part C: Mitigation Strategy confirms that to achieve water neutrality, water demand should first be reduced as low as practicable, before the remaining demand is offset in the wider area, in this case within the water resource zone. This can be done by requiring a more ambitious water efficiency standard in new build households and in new build non-household development. The Strategy makes allowance for the demand management measures already targeted by Southern Water as part of their current Water Resource Management Plan (WRMP19). This will effectively offset part, but not all, of the growth proposed within the emerging Local Plans.
- A23 Without an up-to-date Local Plan Policy, the Building Regulations water efficiency target is 125 litres per person per day (l/p/d). Local Authorities, where located in areas of serious water stress, are encouraged to apply the Building Regulations optional technical standard of 110l/p/d. Identifying this standard through a dedicated Local Plan policy is considered the most appropriate way to secure the necessary water efficiencies.
- A24 Turning to water neutrality, in order to meet the legislative requirements of the Habitats Regulations, it is essential for the impact of development on protected sites to be considered "in combination" with all the development within the affected WRZ, regardless of administrative boundaries. Water neutrality is required at the Water Resource Zone level. Therefore, the Water Neutrality Study Part C recommended that the LPA-led Offsetting Scheme should act across LPA boundaries, with offsetting costs and benefits shared. This approach reflects Natural England advice that water neutrality should be addressed at a strategic level, and ensures a consistent approach across Local Authority boundaries and a more stable cost.
- A25 To not have a Local Plan policy with a specified water efficiency target would lead to significant uncertainty, and potential for double counting and contradictory decisions in relation to water neutrality. Therefore, it is unclear how much development would be able to be achieved without a clear water efficiency standard set out in the Local Plans to calculate an offsetting plan against.
- A26 To date, some developments have been able to progress by demonstrating they can achieve water neutrality on their own (either by using the same or less water as an existing use or by securing their own offsetting mitigation measures). In response to the water neutrality requirement, CBC has progressed a pilot retrofitting programme. The pilot scheme has assessed water savings that could be achieved through installation of a flow restrictor device in Crawley Homes (council stock) properties. The pilot delivered sufficient offsetting to enable identified planning applications for affordable residential schemes in Crawley to be permitted.

It is intended that Local Authority offsetting, referred to as Sussex North Offsetting Water Scheme (SNOWS) will be expanded to enable further policy-compliant development to come forward where developers are able to access the scheme.

- A27 Offsetting must be in place before water demand is generated, for instance before new houses are occupied. If it is not possible to provide sufficient offsetting up front, either because it cannot be delivered fast enough, or there is not enough available offsetting to meet demand, this will restrict the amount of growth that can go ahead. In addition, the joint Water Neutrality Study Part C and evidence gathered from the CBC pilots confirmed that if a less ambitious water efficiency standard is applied to new development, the more complex, costly and uncertain the delivery of offsetting becomes. The more off-setting is needed, the more difficult it becomes to achieve water neutrality, due to the finite options available within the water resource zone.
- A28 From a legal position, it is clear that ignoring the expert advice from Natural England and failing to take account of a potential significant adverse effect on important natural habitats was not reasonable and would risk the councils being challenged through the courts as the competent authority making the decisions. Therefore, this was discounted.
- A29 Requiring the matter to be addressed by upgrades to infrastructure by the Water Company was also discounted as outside of the councils' control. This is not something which is possible through the current regulatory system and would result in no Local Plans and no further development (unless it could demonstrate it can be water neutral) to come forward ahead of a strategic solution for securing water supply for the area from another source.
- A30 It is noted that, once a long-term solution has been put in place by Southern Water, a water neutrality scheme may no longer be required. This has been reflected in the Water Neutrality Study Stage C: Mitigation Strategy recommendations.

What the Local Plan can and cannot do

- A31 The Local Plan can support the delivery of an efficient and sustainable supply of water over the Plan period through policies that apply the advice of the Water Cycle Study, Water Neutrality Strategy, and evidence from Water Infrastructure providers. This will ensure that where planning permission is required, development is planned in a sustainable manner that achieves water neutrality, lowering 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.
- A32 The Water Neutrality Study Part C confirmed that if 85 l/p/d is adopted as a water efficiency target, schools retrofitting and flow regulators could be sufficient to offset the remaining water demand.
- A33 The Water Neutrality Study Part C recommended that the LPA-led Offsetting Scheme (SNOWS) should act across LPA boundaries, with offsetting costs and benefits shared. Part C highlighted that such an LPA-led Offsetting Scheme will require an operating body that will administer it, collect funding, pay offset providers and monitor results. The Part C Mitigation Strategy sets out the following recommendations and expectations of the Offsetting Scheme:
- This body will need to work closely with Southern Water to monitor their progress in reducing overall PCC in the Water Resource Zone, which will be a critical component in the Strategy. It will also be important to monitor the difference between actual water demand from new development and its designed water demand.
 - LPA monitoring of growth (both permissions and completions) on a monthly basis and reporting on a yearly basis will also be key to ensure sufficient offsetting is in place prior to

occupation of development (i.e., when the additional water demand is experienced). Therefore, close communication with developers will be required.

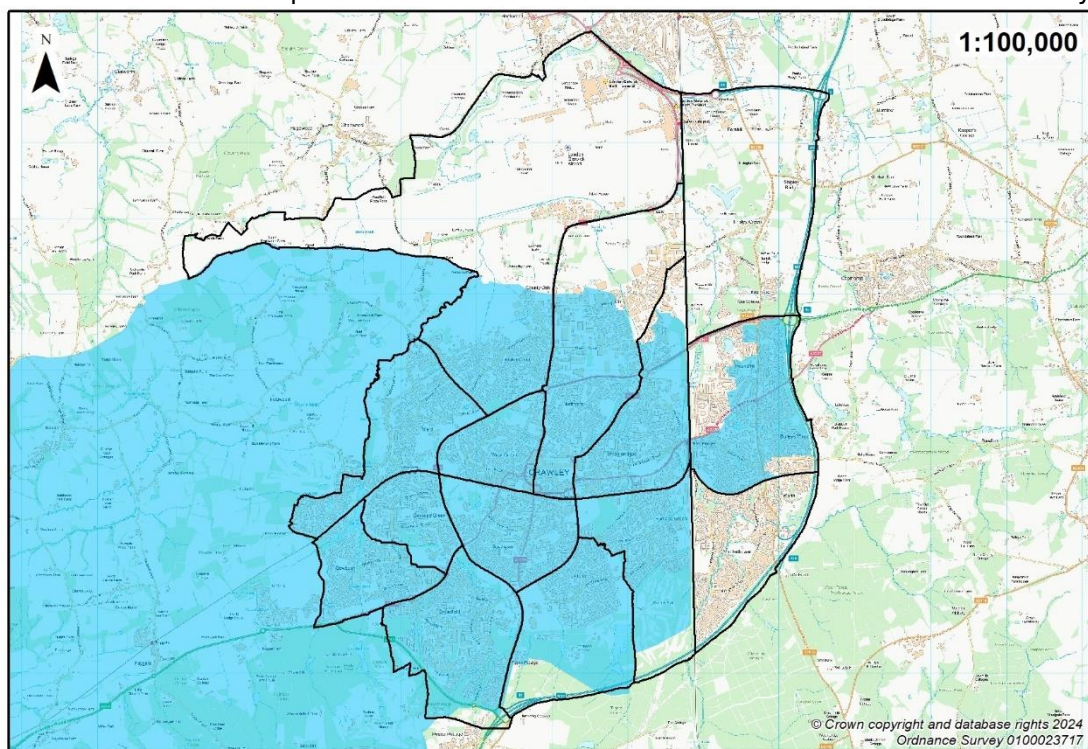
- When a developer submits a planning application within the water resource zone, a water neutrality statement will need to be provided. This will identify the type of development, how much new water demand will be generated, the water efficient fittings and technologies to be applied, and details of any offsetting to be delivered by the developer or a third-party.
- If accessing SNOWS, the developer will then pay a fee per litre of offsetting required, to be collected by the Offsetting Scheme and used to deliver the appropriate level of offsetting within the WRZ.
- It is proposed that the total cost of delivering the required offsetting volume is spread across all development (required to be water neutral) accessing the Offsetting Scheme during the Local Plan period. This will significantly reduce the cost for individual developers, in particular smaller developers where the burden of offsetting on a smaller scheme would be greater. Developers accessing SNOWS will be required to contribute to the offsetting programme throughout the period covered by the Offsetting Scheme. Development is not required to utilise SNOWS, and may choose to undertake its required water offsetting through other offsetting schemes within the water resource zone.

A34 The Water Neutrality Study Part C confirmed there would be delays in the timings associated with the levels of development set out in the local plan development trajectories above that which the baseline water capacity can meet (particularly in the early plan period). Even with the water capacity and associated quantum of development across the Water Resource Zone established, how this should be distributed across the Water Resource Zone needs to be established. Critically, since the Natural England Position Statement was issued in September 2021, a significant number of planning applications have been affected across the water resource zone, relating to a combined c.2,300 new homes and c.100,000sqm business floorspace, as well as applications for other development, including minerals, waste and infrastructure (for schools, fire and rescue, and libraries). Once SNOWS is running, developers understandably may expect all development to come forward immediately. However, given that development cannot be allocated unless water neutrality has been demonstrated, the gaps between supply and demand in the early years of the local plan period and uncertainties about the timely delivery of offsetting measures, it is unlikely that all of the development currently in the pipeline can all be approved immediately. In particular, the bank of water offsets will take time to build up.

A35 Therefore, it is necessary to consider how development should come forward across the authorities' areas, and whether or not there should be a prioritisation approach to any phasing of development which may be needed due to the water capacity available across the Sussex North Water Resource Zone. In particular for Crawley, the council's affordable housing schemes, and those private developments which will bring forward a minimum of 40% affordable housing, are a priority for the local authority. Crawley Homes is bringing forward affordable housing-led schemes which have led on the water offsetting pilots, in order to secure planning permission for water neutral standalone developments. Therefore, these pilots form the basis for much of the evidence to support the Implementation Scheme going forwards and have contributed substantially already to the 'offsetting bank' required for the Implementation Scheme. On this basis, these development proposals are considered a priority and essential to enable the local authorities' Implementation Scheme to be developed.

A36 The water neutrality requirement only applies to the parts of Crawley which fall within the Southern Water Sussex North Water Resource Zone (see Map A1 below), until such time as a strategic solution is found by the water company and agreed by Natural England to no longer affect the protected habitats.

Map A1: Sussex North Water Resource Zone extent across Crawley Borough



■ Sussex North Water Resource Zone: Water Neutrality (Policy SDC4)

Indicator No.	Indicator	Crawley Data	Trend	Data Sources
A6	Per capita water consumption	2020/21 Southern Water – 137.6 l/p/d South East Water – 158.6 l/p/d SES Water – 163.4 l/p/d	<p>Southern Water has recorded an increase in water use, attributed to changes resulting of Covid-19, with the 2020/21 figure representing an increase of around 7% on the equivalent 2019/20 figure of 126.5l/p/d.</p> <p>For South East Water, the 2020/21 figure represents a 4.4% reduction compared with 2019/20 consumption.</p> <p>For SES Water, the 2020/21 figures represents an increase from the corresponding 2019/20 figure of 143.3l/p/d</p> <p>The DEFRA water target set out in its May 2022 evidence report is to achieve a per capita consumption of 110l/p/d by 2050. This corresponds with the approach set out in the Written Ministerial Statement on Reducing Demand for Water, published July 2021. Southern Water have introduced a 100 litre per person per day target.</p> <p>The draft Local Plan, based on evidence from the Water Cycle Study, sets out a water efficiency requirement for residential is 110l/p/d or BREEAM ‘Excellent’ for non-residential development, where not subject to water neutrality. For development that is subject to water neutrality (that located within the Sussex North water resource zone) the requirement for residential is</p>	<p>Annual Report and Accounts 2022, for (respectively) Southern Water, South East Water, SES Water</p> <p>Defra Water Targets Detailed Evidence Report (May 2022)</p> <p>Written Ministerial Statement on Reducing Demand for Water (July 2021)</p> <p>Southern Water Target 100.</p>

			85l/p/d or 3 credits within the water consumption BREEAM standard or equivalent.	Sussex North Water Resource Zone Water Neutrality Implementation Scheme and Monitoring
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Issue: The potential for development to be concentrated in Crawley may lead to sewerage capacity problems

- A37 As well as potentially adding to water supply stress, new development at Crawley will invariably take up sewerage network capacity. To establish whether there is sufficient sewerage treatment and network capacity to accommodate identified levels of residential and economic growth, the Water Cycle Study Addendum Report (2021) undertakes modelling of anticipated growth over the Plan period. This identifies that the flow permit for Crawley Waste Water Treatment Works is likely to be exceeded towards the end of the 2025-2030 period (near the end of the AMP8 period). Thames Water has confirmed that the works is close to its treatment capacity, and will exceed its permit during the Local Plan period.
- A38 A new permit from the Environment Agency is likely to require a tighter Ammonia, Biochemical Oxygen Demand (BOD) and suspended solids consent, likely requiring an upgrade to achieve. It should be noted that in the event of an upgrade to sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to the sewer network under the Water Industry Act, the Infrastructure Provider may request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and/or water pollution. It will be important to ensure that growth is aligned with delivery of additional capacity at Crawley Waste Water Treatment Works. Waste-water/Sewage Treatment Works upgrades take longer to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years to plan, design, obtain approvals and build. In case of major development, it is strongly recommended that developers engage with Thames Water, as the wastewater infrastructure provider, at the earliest opportunity to establish:
- the development’s demand for wastewater/sewage treatment and network infrastructure, both on and off site, and whether it can be met; and;
 - what loading/flow from the development is anticipated.

Likely evolution without the continued implementation of the Local Plan

- A39 Without a Local Plan in place, it would not be possible to identify the level of predicted housing and employment growth, the location of this growth, nor the trajectory for it coming forward. Such an approach would present challenges for the infrastructure provider to plan effectively to accommodate this growth, particularly in relation to the level of upgrades required and the timing of delivery. Further, it would make it challenging to ensure that development is appropriately phased, if required, to coincide with the necessary upgrades to Crawley WwTW. Therefore, without the Local Plan 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

- A40 Through continued dialogue with infrastructure providers, the Local Plan can manage the delivery of housing and employment that is planned for and, if necessary, phase development to enable

Thames Water to ensure sufficient sewerage infrastructure is in place. The Plan can also seek to put in place a framework that is supportive of upgrades to the infrastructure network and ensure that new development does not worsen the current strain on the sewerage network, for example through requiring that new brownfield development does not allow surface water to drain to the foul sewer.

Indicator No.	Indicator	Crawley Data	Trend	Data Sources
A7	Number of planning permissions where Thames Water request a drainage planning condition	New Indicator	If no action were taken, Crawley Waste Water Treatment Works may exceed its flow permit during the plan period. As a developer has the automatic right to connect to the sewer network under the Water Industry Act, the Infrastructure Provider may request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development.	Gatwick Sub Region Water Cycle Study (2020)

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

- A41 As part of the Local Air Quality Management process (LAQM) required by the Environment Act 1995, the council carries out an annual review and assessment of air quality in the borough, which helps identify local air quality hot spots, and relate these to pollution sources. Road traffic is the main source of nitrogen dioxide (NO₂) pollution in Crawley, and our network of monitoring sites records levels along busy roads as well as at background locations and areas of specific interest, in order to give a broad picture of pollution levels across the borough. If the council finds areas where air quality objectives are not being met, it will set out an Air Quality Management Area (AQMA) and produce an action plan (AQAP) showing what steps it will take to improve air quality in that area.
- A42 Air Quality in Crawley is mainly good, with the exception of a small number of locations alongside busy roads where an air quality management area (AQMA) has been declared. Following exceedance of the objective levels for NO₂ close to Three Bridges Station, the AQMA was extended in 2021 to incorporate this newly identified area. A key contributor to poor air quality in these areas is emissions from all types of vehicles along busy roads and commuter routes.
- A43 Measured results for 2021 NO₂ show that national air quality objectives were met at all of Crawley’s monitoring sites, although NO₂ concentrations along A2220 at Three Bridges and A2011 Crawley Avenue are still high, and these sites will therefore continue to be closely monitored in the coming years. 2021 levels of nitrogen dioxide were generally slightly higher than in 2020, when Covid travel restrictions caused vehicle pollution levels to fall sharply, but still lower than pre-Covid levels. Trends in annual nitrogen dioxide concentrations show downward trends at all sites, including sites next to busy roads and close to the airport. The long term monitoring data for Crawley shows that concentrations of nitrogen dioxide have fallen throughout the borough since the mid-2000s, despite significant housing and commercial development over the same period. However, levels have remained broadly consistent in more recent years as the rate of improvement slows.
- A44 The council intends to build upon the improving air quality picture across the borough by developing and updating its air quality action plan and continuing to work in partnership with colleagues in Planning, Highways and Sussex Air Quality Partnership as well as engaging its staff, the public and local businesses to further improve air quality in the area.

Likely evolution without the continued implementation of the Local Plan

A45 Although national standards for air quality may improve matters in the short term, it is possible that it may start to decline again in the future as development of both Crawley borough and Gatwick Airport come forward, and traffic increases.

What the Local Plan can and cannot do

A46 The Local Plan influences the sustainability of new development, including the location and design of buildings; has some influence over the use of private car in new developments; and the promotion of sustainable travel mode share and options, although it is individuals and businesses that are responsible for the environmentally based decisions that they make on a day-to-day basis. Policy EP5 of the Local Plan will require development to positively address air quality issues, including through the provision of on-site mitigation or an equivalent S106 financial contribution. The growth of the nationally significant airport and increase in passenger numbers is a factor largely outside the control of the Local Plan and the council. However, by ensuring that airport parking is only permitted within the Gatwick Airport boundary and that it must be justified by a demonstrable need, Policy GAT2 will help to reduce the number and length of trips whilst supporting the S106 legal agreement obligation to achieve a 48% target of passengers travelling to the airport by public transport. The most recent ASAS, October 2022, includes a more ambitious target of 52% of passenger journeys being made by public transport. It is lifestyle decisions that will ultimately determine the air quality in the town and surrounding area. However, where planning decisions are required, the Local Plan will seek to ensure that development is planned positively and sustainably to address matters of air quality.

Indicator No.	Indicator	Crawley Data	Trend	Sources
A8	Trends in annual mean NO ₂	No exceedances of the NO ₂ 40 µg/m ³ annual mean objective were found in 2021.	The annual mean air quality objective is 40µg/m ³ . In 2021, all monitoring locations met the annual mean air quality objective and there were no exceedances. A slight increase in NO ₂ concentrations was measures across most sites in 2021 compared to 2020.	CBC 2022 Air Quality Annual Status Report
A9	Trends in annual mean PM ₁₀ concentrations	No exceedances of the PM ₁₀ 40µg/m ³ mean annual objective were found in 2021.	The annual mean PM ₁₀ concentration recorded in 2021 showed an increase of 16% in relation to the previous year, but a decrease of 14% in relation to 2019. The five-year trend for PM ₁₀ therefore continues to trend downwards.	CBC 2022 Air Quality Annual Status Report
A10	Proportion of new dwellings with single aspect windows facing within 45 degrees of east, west and south.	In 2021/22 the relevant figure was 55 dwellings out of 359 completed, representing 15% of the total.		CBC Planning Register; Crawley Authority's Monitoring Report

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 a number of issues, including uncertainty surrounding the future expansion of Gatwick Airport.

- A47 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.
- A48 Gatwick Airport is a significant source of noise pollution in Crawley. Currently, a wide area, particularly to the south of the existing operational runway, is noise affected, which means that residential uses are inappropriate in this location. The possibility of further growth at the airport, particularly if delivered through a new southern runway, would result in more of the town being affected by aircraft noise, particularly in the north of the borough.
- A49 In this context, it is important that development is appropriately located and designed to avoid giving rise to significant adverse impacts on health and quality of life through noise exposure, having regard to both existing and future noise sources. The Local Plan 2015-2030 introduced a Noise Annex which set out locally specific noise standards for Crawley. These standards have been updated to take account of new evidence relating to the health impacts of noise exposure.

Likely evolution without the continued implementation of the Local Plan

- A50 Without a dedicated Local Plan policy and locally specific noise standards, it is possible that development, be it noise sensitive or noise generating, could be inappropriately located, resulting in unacceptable noise impacts for future occupiers or unreasonable burdens on existing operations. Any decisions related to the development of growth at Gatwick Airport, including GAL’s current Northern Runway Project (progressing through the Development Consent Order process) and/or a potential wide-spaced southern runway, will likely be considered as nationally Significant Infrastructure, and will be determined by the Secretary of State, outside of Crawley’s Local Plan.

What the Local Plan can and cannot do

- A51 The Plan can strongly influence the location and types of development within areas of the borough that may be subject or sensitive to noise. The production of the Local Plan will enable the relationship between noise sensitive uses and noise generating uses to be appropriately managed to ensure development does not result in, nor expose people to, an unacceptable noise impact.

Indicator No.	Indicator	Crawley Data SE/England Data	Trend	Data Sources
A11	Number and type of new noise sensitive uses built in areas currently and potentially affected by unacceptable noise.	For noise from aviation sources, the 2015 Local Plan permitted noise sensitive development up to the 66 dB (A)Leq noise contour. The new Local Plan, for aviation noise sources, permits noise sensitive development up to the 60dB (A)Leq noise contour. The reasoning for having a lower level than for surface transport sources	If a new southern runway is located at Gatwick, a number of existing properties will fall inside the projected 60 dB (A)Leq noise contour. It is important to ensure that the number of noise sensitive uses exposed to unacceptable noise is not increased.	CBC Planning Register; Crawley Authority’s Monitoring Report

		(66dB) is due to the fact that road and rail noise generally only affects the facades facing the source, whereas in the case of aircraft noise, all facades of a dwelling are affected, and there is ultimately no escaping the noise apart from inside the dwelling with the windows closed.		
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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, relics of human activity dating back to prehistory remain above and below ground. Many features of the cultural heritage and design present within the original settlements (Ifield, Crawley, and 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.
- B2 These features are often fundamental to the ‘feel’ or ‘character’ of the neighbourhoods and the quality of the town’s environment. Tangible, physical assets (although some less physically obvious than others) together result in places people positively experience, appreciate and enjoy across the borough. However, many of these features are subtle and nuanced in terms of their form, spatial location and coverage and are increasingly under development pressure as Crawley continues to expand. This concern is particularly relevant and timely when considering the NPPF’s requirements and emphasis in regard to the efficient use of land and increasing densities. Securing beautiful, sustainable buildings and places is fundamental to what the planning and development process should achieve. New development should maintain and be grounded in an understanding and evaluation of each area’s defining local character and history.
- B3 The key issues in relation to heritage, design and architecture are discussed below.

Relevant Plans, Policies and Programmes

- B4 For the purposes of this SA/SEA report, 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 (MHCLG, 2021)
- Planning Practice Guidance: Historic Environment, Ref: 18a-001-20190723 (MHCLG, 2014 and later updates)
- Levelling Up White Paper (DLUHC, 2022)

Heritage

- Heritage Statement: One Year On (DCMS, 2018)
- Culture White Paper (DCMS, 2016)
- Crawley Borough Council Corporate Heritage Strategy (2008)
- Crawley Local Buildings List (CBC, November 2010)
- Budapest Declaration on World Heritage (UNESCO, 2002)
- Planning (Conservation Area and Listed Buildings) Act 1990
- Crawley Conservation Areas and Non-Designated Heritage Assets Review (Place Services, 2020)
- 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)
- English Heritage, West and East Sussex EUS
- Understanding Place: Historic Area Assessments (Historic England 2017)

- Suburban Landscapes Inherited Landscapes and Suburban Greens (Historic England 2016)
- Historic Landscape Characterisation (Historic England 2003)
- World Heritage Convention (UNESCO, 1972)

Character and Design

- National Design Guide (MHCLG October 2019)
- National Model Design Code, DLUHC, 2021
- Historic Environment Good Practice Advice Planning Note 3: The setting of Heritage Assets Historic England, 2017
- Living with beauty: report of the Building Better, Building Beautiful Commission (MHCLG 2020)
- Crawley Baseline Character Assessment (2009)
- Building for a Healthy Life – Design for Homes (2020)
- The Councillors guide to urban design, (Design Council CABE team 2003).
- Urban Design Compendium, (Updated HCA 2013, originally by English Partnerships 2000)
- Creating successful masterplans, a guide for clients' (CABE 2008)
- Gear Change, a bold vision for cycling and walking (DFT 2020)
- Secure by Design, Policy Crime Prevention Initiatives Limited (2021)
- Housing Space Standards (GLA, 2006)
- The Housing Design Handbook (2010) David Levitt, Levitt Bernstein Architects
- Essex Design Guide Essex Local Authorities Essex Planning Officers Association, 2018
- Technical Housing Standards – Nationally Described Space Standard (MHCLG, 2016)

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

B5 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. The visual appearance and heritage interest of the town are of importance because they affect 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 an age and style whose attractiveness and historic interest is not always widely appreciated. Consequently, the perception of Crawley to some outsiders (and outside investment) can be negative. However, despite having grown considerably over a short period of time, Crawley's neighbourhoods have retained distinctive characters and the town retains significant heritage assets, both pre-New Town and those associated with its development as a first wave planned New Town following its designation in 1947.

Heritage

- B6 There are 104 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 four II* properties.
- B7 There are four Scheduled Ancient Monuments, 13 Archaeologically Sensitive Sites and 38 other areas of suspected archaeological interest. There are six historic parks included within West Sussex County Council's list of sites of archaeological interest.
- B8 There are currently 13 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, Forestfield & 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), Hazelwick Road (Three Bridges), Queen Square and The Broadway (Northgate), and Gossops Green Neighbourhood Centre (Gossops Green)

- B9 There are six designated Areas of Special Local Character (ASLC) in Crawley, which are locally important areas of historic value and special environmental quality. Four of these are located in Pound Hill. As part of the Local Plan Review it is proposed to designate three additional ASLCs and to amend the boundaries of five others, reflecting recommendations from the 2020 Crawley Conservation Areas and Non-Designated Heritage Assets Review.
- B10 The council has prepared a number of plans, including the adoption of a Corporate Heritage Strategy in June 2008. The evidence base for this topic includes various studies, including the 2020 Conservation Areas and Non-Designated Heritage Assets Review, and previously the 2009 Crawley Baseline Character Assessment and 2010 ASEQ (now known as an ASLC) review, both of which provide an assessment of the town and the need and opportunity for revisions to Conservation Areas and local or 'non-designated' heritage assets. The Crawley Extensive Urban Survey (EUS, 2008) forms part of the Sussex (EUS), a survey of Historic Towns in Sussex, as part of a national survey programme to assess smaller historic towns of England, county by county. The Sussex EUS 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 was prepared by a consultant on behalf of West Sussex County Council (with funding from English Heritage).

Urban Design

- B11 Urban form and structure have a major influence on climate change. There is a crucial relationship between form and space, buildings, energy, movement patterns, land take and location. 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. Choices made in relation to the layout and scale of new development strongly influence everyday human activity, particularly in relation to movement which dictates how people move within, through and around a place. As a result, it has a major influence on climate change. As the National Design Guide states; "*Compact forms of development bring people together to support local public transport, facilities and local services. They make destinations easily accessible by walking or cycling wherever this is practical. This helps to reduce dependency upon the private car*". Good design should be based on an understanding of movement patterns around which appropriate uses can be located and then suitable densities determined.
- B12 The commercial viability of frequent and reliable public transport depends on compact development and minimum densities which provide a substantial and reliable customer base for public transport services. In turn, frequent and reliable services encourage a shift away from private car use when development is also located within 5 minutes walking distance of a local foodstore and 10 minutes of a primary school or health centre, Research suggests net densities of 60 dwellings per hectare are necessary to sustain a dependable, frequent and high capacity public transport service which enables users to access other key services, centres of employment and other key destinations, such as currently exists in Crawley along sections of the Fastway bus network

Likely evolution without the continued implementation of the Local Plan

- B13 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. The effective use of land is an important objective in making development more sustainable. Compact development not only

uses less land, but it also has the potential to create efficiencies in the use of other resources, including energy supply, services and transportation and to allow better provision of open space. It is important that land is used effectively, particularly given the limited land supply in the borough. Building at higher densities can deliver high quality development. However, there are many examples nationally where more compact development has produced a poor quality environment and this has generated negative public perceptions.

- B14 Through the continued implementation of the Local Plan, in seeking higher densities for the borough, compromising the town's character, reducing quality of life for residents and creating town cramming, will still not be accepted. 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. The identification and understanding of local character more generally, and in particular the less obvious physical skeleton, or rural/urban structure, underpinning every area is important to guide the form of new development. This key structure needs to be defined accurately in order to help identify and clarify positive existing character, to capture how and why people experience, appreciate and enjoy a place. This will allow for these valuable existing features to be retained and enhanced and for new compact development to instead be focused in the other parts of the borough which are suitable to intensification. Crucially, compact development form needs to be carefully stitched and moulded into its surroundings, guided by the existing character of an area.
- B15 The NPPF states that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions. In terms of layout, design and residential amenity, compact development requires more thought, expertise and craft than is usually applied to low density development. A far greater quality of architectural design, attention to detailing, materials and consideration of the needs of future occupants is needed. The National Design Guide and National Model Design Code provide guidance on what constitutes well-designed and beautiful places as well as providing a default checklist of issues that schemes will be expected to address. These national documents will be used by Crawley Borough Council, alongside existing and future SPD guidance, masterplans, locally bespoke design codes and Area based Character Assessments to better ensure well-designed buildings, spaces and landscape are delivered across the borough. This will improve the quality of life of residents and the perception, attractiveness, functionality visual appearance, distinctive local character and heritage interest of the town to outside businesses and potential residents and investors.
- B16 Higher levels of sustainable residential density depend on proximity to fast, reliable, frequent and high capacity public transport. Such infrastructure is already in place in areas such as the town centre, parts of Three Bridges and the number 10 Fastway route. Without the continued implementation of the Local Plan, it will be harder for the council to successfully and appropriately promote residential density in excess of 60 dwellings per hectare for these key sustainable locations.

What the Local Plan can and cannot do

- B17 Through Local Plan policies and design guidance, the quality and site specific design response of new development can build upon, protect, reinforce and enhance the existing local character, while not preventing or discouraging appropriate innovation or change (such as increased densities). Furthermore, subject to the other policy considerations, the beautiful, environmentally beneficial and culturally important areas of the town can continue to be protected.

B18 Local Plan policy and guidance is essential in order to establish new development form for significant development based on sustainable compact layout and scale making the best use of land, taking advantage of sustainable transport options and encouraging sustainable modal shift within adjacent, existing developed areas. In particular, it can enable and promote medium and higher density ranges in specific locations accessible by high frequency public transport, unless the existing character justifies a lower figure.

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
B1	Number of listed buildings on the Buildings at Risk Register	No buildings currently on the at risk register.			Historic England Heritage at Risk
B2	Percentage of conservation areas with up-to-date Appraisals (i.e. last 5 years).	Five out of Crawley's thirteen Conservation Areas (38%) have up to date statements as of December 2022.	N/A	These Appraisals are being reviewed with the Conservation Area Advisory Committees.	CBC Authority Monitoring Report
B3	Proportion of the borough covered by up-to-date Area-based Character and Design Assessments (ABCA).	0 currently: Not currently monitored. However, future data will serve as a baseline	N/A		CBC Authority Monitoring Report
B4	Proportion of the borough covered by design vision and opportunity studies and /or masterplans	Currently only the Forge Wood Masterplan and specific sections of the Town Centre are covered (e.g., see Town Centre SPD). Not currently monitored and future output is dependent on ABCA in order to first define key foundational parameters	N/A	The importance of this output is outlined in new national design guidance; the new Model Design Code and National Design Guide.	CBC Authority Monitoring Report

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/SEA Report, 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 (MHCLG, 2021)
- Levelling-up and Regeneration Act 2023
- The Town and Country Planning (Permission in Principle) Order 2017
- Housing and Planning Act 2016
- National Design Guide (MHCLG, October 2019)
- National Model Design Code, DLUHC, 2021
- Housing Delivery Test Measurement Rulebook (2018) (MHCLG, 2018)
- Housing Delivery Test: 2021 Measurement (2022) (DLUHC, 2022)
- Housing Delivery Test: 2021 Measurement Technical Note (2022) (DLUHC, 2022)
- Northern West Sussex Housing Needs Statement of Common Ground July 2023
- Living with beauty: report of the Building Better, Building Beautiful Commission (MHCLG, 2020)
- Self-build and Custom Housebuilding Act 2015
- Self-build and Custom Housebuilding Regulations 2016
- Self-build and custom housebuilding independent review (MHCLG, 2021)
- Planning Practice Guidance (MHCLG, 2015, 2016, 2017, 2018, 2019)
- White Paper: Fixing our broken housing market (MHCLG, 2017)
- Affordable Housing Supplementary Planning Document (CBC, 2017)
- Tinsley Lane Development Brief Supplementary Planning Document April 2017 (CBC, April 2017)
- East of Balcombe Road/Street Hill Development Brief Supplementary Planning Document Consultation Draft November 2018 (CBC, November 2018)
- Rectory Homes Limited v Secretary of State for Housing Communities and Local Government High Court Judgment, July 2020
- Site Allocations and Flood Risk Background Paper December 2023 (CBC, December 2023)
- Clean Growth Strategy (BEIS, 2017)
- Gatwick Diamond Local Strategic Statement (Chilmark Consulting, 2017)
- Housing Act (2004)
- Planning Policy for Traveller Sites (MHCLG, 2015)
- CBC Corporate Priorities 2023-2027 (2023)
- Strategic Housing Market Assessment (Iceni, 2019)
- Northern West Sussex Strategic Housing Market Assessment and update (GVA, 2009 and 2012)
- Northern West Sussex Housing Market Area 'Affordable Housing Needs Model Update' (Chilmark Consulting, 2014)
- Gatwick Northern Runway Project Appendix 17.9.3 Population and Housing July 2023 (Gatwick Airport Limited, July 2023)
- Objective Assessment of Crawley's Housing and Employment Needs (Chilmark Consulting, 2015)
- Homelessness Strategy 2014-2019 (CBC, 2014)

- Housing Trajectory, Base Date 31 March 2023 (CBC, December 2023)
- Strategic Housing Land Availability Assessment (CBC, 2023)
- Crawley Windfall Statement (CBC, 2023)
- Compact Residential Development Study (CBC, 2023)
- Lessons from Higher Density Development (GLA, 2016)
- At Crawley Study (GL Hearn, 2009)
- Crawley Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment, Final, November 2023 (CBC, November 2023)
- Draft Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (CBC, 2021 and May 2023)
- Gypsy and Traveller Accommodation Needs Assessment (GTAA) (CBC, 2014)
- West Sussex SHOP@ Summary Report (WSCC, 2014)
- Independent living in your retirement: Housing Opportunities (CBC, 2010)
- Urban Design Compendium (Updated HCA 2013, originally by English Partnerships 2000)

Issue: Local Housing Delivery is sensitive to the National Economic Climate

C3 Housing delivery in the period 2015 to 2022 exceeded the annual average requirement detailed in the 2015 Local Plan. However, this followed a period of weak delivery from 2011 to 2015 owing to the slow recovery of the development industry following post 2008 economic downturn. At present, various sources of economic disruption and uncertainty, including the war in Ukraine, the after-effects of the COVID-19 pandemic, and the departure of the UK from the European Union, are weighing on development activity. In addition, the water neutrality issue within northern Sussex has had a significant negative impact on the grant of new permissions since September 2021. These fluctuations have been reflected in delays in the build out of allocated and permissioned sites, and consequently depressed housing delivery.

Likely evolution without the implementation of the Local Plan

C4 Without the development of the Local Plan and identification of housing sites, the future pattern of development would be more uncertain and the planning risks associated with residential and other types of development would be greater. This unpredictability would increase the economic costs of development, while also increasing the risk that 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 macroeconomic factors affecting development activity are largely beyond the control of the Local Plan. However, the planning policy viability implications for new housing development within the town have been considered as part of the updated Local Plan Viability Study.

Indicator No.	Indicator	Crawley Data	Trend	Data Sources
C1	Plan period and housing delivery targets	Average annual net delivery of 498 dwellings per annum over 2015-21, & delivery of 356 units net in 2021/22, and 190 in 2022/23 compared with Local Plan target of 340dpa	Fluctuating widely between appx 170 and 600dpa.	Crawley Authority’s Monitoring Reports 2015-2021. Housing Trajectory Base Date 31 March 2023; West

Indicator No.	Indicator	Crawley Data	Trend	Data Sources
				Sussex County Council Monitoring Information 2022/23.
C2	Trajectory comprising: a) Net additional dwellings – in previous years b) Net additional dwellings – for 2021/22 and 2022/23 c) Net additional dwellings – in future years Managed delivery target	a) 2,990 net delivered over 2015-21 b) 356 (net) in 2021/22; 190 in 2022/23 c) 5,330 projected over 2023-40	So far during the Local Plan period current delivery has exceeded the annual average housing target and projected delivery for the entire Local Plan period is exceeding the supply identified at the point of adoption in 2015.	CBC April 2021-base Housing Trajectory; CBC submission 2022 Local Plan Housing Trajectory – base date 31 March 2023; Crawley Authority's Monitoring Reports 2015-2021 CBC/WSCC Monitoring information 2022/23.
C3	Net additional pitches (Gypsy and Traveller)		The Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (CBC, 2014) identified a potential future need for up to ten pitches within Crawley.	Crawley Authority's Monitoring Reports 2015-21
C4	Gross affordable housing completions	Gross delivery of 1,134 over period 2015-2022, amounting to 33% of total supply and 46% of supply on sites with planning permission	Delivery of affordable housing has accelerated over the period 2015-22, exceeding within that period the implied average requirement of 136dpa (i.e. 40% of 340dpa).	Crawley Authority's Monitoring Reports 2015-2021 CBC/WSCC Monitoring information 2021/22

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

- C6 The 2021 Census indicates that the population of Crawley has risen significantly over recent decades, increasing by 45% from 82,000 in 1981 to 118,500 in 2021. 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 16% between 2019 and 2039, reflecting the relatively young age profile of today's population. Over those 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. 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 52% from 30,000 in 1981 to 45,500 in 2021. This increase is greater than the growth in population over a similar period. Average household sizes declined from 2.74 in 1981 to 2.48 in 2011, before increasing again to 2.59 in 2021. This compares 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 (June 2020) project a figure of 271 per annum for the period 2023 to 2040 based on 2018 population projections.

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 H4 of the consultation draft review Local Plan (Future Housing Mix) endeavours to provide the appropriate future housing mix for the future generations of residents within Crawley.

Indicator No.	Indicator	Crawley Data	Trend	Data Sources
C5	Mix of affordable housing delivered compared to the indicative affordable housing provision by no. of bedrooms identified in the most recent SHMA (1-bed – 29%, 2-bed – 31%, 3-bed – 30%, 4-bed – 10%)	During 2015-21, out of 951 gross affordable housing units completed the breakdown was: - 1-bed 269 (28%); - 2-bed 516 (54%); - 3-bed 161 (17%); - 4-bed 5 (0.05%)	The greatest demand trend is for smaller homes, but those waiting for larger family homes currently wait the longest for suitable properties.	CBC Authority Monitoring Reports 2015-21
C6	Mix of market housing delivered compared to the indicative affordable housing provision by no. of bedrooms identified in the most recent SHMA (1-bed – 10%, 2-bed – 25%, 3-bed – 40%, 4-bed – 25%)	During 2015-21 out of 2,110 gross housing units completed the breakdown was: - 1-bed 827 (39%) - 2-bed 810 (38%) - 3-bed 321 (15%) - 4+-bed 152 (7%)	Tendency towards under-delivery of larger unit sizes	CBC Authority Monitoring Reports 2015-21

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. Therefore, there is 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 Local Plan Review provides an opportunity to reassess the composition of need, particularly with regard to the role of intermediate tenures, which might be lost. This was undertaken as part of the updated Strategic Housing Market Assessment.

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	Trend	Data Sources
C7	Estimated number of households in housing need (per annum)	739 affordable dwellings per annum		North West Sussex Strategic Housing Market Assessment (Iceni Projects, 2019)
C8	Median Workplace-Based Affordability Ratio	2020: Lower Quartile Ratio – 11.08 2021: Median Ratio – 8.99 2022: Median Ration – 9.27	This has been steadily rising from 1998 – 4.00 and significantly worsened since 2013 (6.1)	North West Sussex Strategic Housing Market Assessment (Iceni Projects, 2019); House price to workplace-based earnings ratio (ONS, 2023)

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.

C16 With the ongoing build out 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

C17 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. 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

- C18 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.
- C19 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. To this end, the Local Plan would ensure that all new development identifies, tests, determines and (where appropriate) embraces opportunities for increased density. Although all new development must identify, define and be designed so that proposals respect, protect, build upon and enhance the positive aspects of existing character (the significance and distinctiveness of both an applicant site and its wider host area), the Local Plan policy does not prevent and should not discourage good quality design and innovative new proposals and change (such as increased densities). Where retrofitting new development within existing neighbourhoods is appropriate, residential schemes designed to a gentle density range of 60 to 150 dwellings per hectare, should be achievable borough wide.

Indicator No.	Indicator	Crawley Data	Trend	Data Sources
C9	Supply of ready to develop housing sites (5-year housing land supply)	5-year housing land supply (1 April 2023 ⁴ to 31 March 202 8 ⁹) = 2,405 2,381	The 5-year housing land supply has tended to be strong in the past few years.	CBC Housing Trajectory – 31 March 2023
C10	New and converted dwellings – on previously developed land (PDL)	2015-2022: 63% of completions	This indicator has fluctuated around a high level, and will increase further as remaining greenfield sites are built out.	West Sussex County Council Monitoring Data
C11	Average density of new residential development	2021/22 All sites – 51.0 dwellings/ha 10+ units sites – 56.5 dwellings/ha Up to 9 unit sites – 26.4 dwellings/ha		West Sussex County Council Monitoring Data.

Topic Area D – Economy

Including: maximising benefits of Crawley’s location at the heart of the Coast to Capital LEP and the Gatwick Diamond areas, supporting business-led sustainable economic recovery, diversification and growth, adding to the available employment land supply pipeline, maximising the efficient use of the designated Main Employment Areas for employment uses and identifying new employment land. Supporting a vibrant town and neighbourhood centres and improving access to training and employment opportunities.

Introduction

- D1 The success of Crawley’s economy is important for the social, economic and environmental wellbeing of the town and the wider functional economic market area. A strong economy can help to generate investment, supporting the economic strength of the Coast to Capital LEP area and the Gatwick Diamond, sub region, encouraging investment, creating employment opportunities and helping to raise aspirations locally. In turn, this can help support social, economic and environmental improvements.
- D2 The available business land supply pipeline in Crawley is highly constrained, presenting challenges in providing the business-led employment floorspace that is needed to support job growth over the Plan period. Crawley’s economy was badly affected by the Covid-19 pandemic, particularly given the significant economic contribution of Gatwick Airport and aviation related sectors. Whilst the borough is now trending towards economic recovery, it is recognised that greater diversification and flexibility is needed to better enable the Crawley economy to adapt to change. More broadly, it is recognised that Crawley residents are less likely to access higher paid jobs compared with the in-commuting population and addressing the local skills gap and improving social mobility is a key issue.
- D3 Therefore, promoting a strong economy and increasing opportunities for all residents to benefit from Crawley’s economic strength are among the key drivers for improving the town.

Relevant Plans, Policies and Programmes

- D4 For the purposes of this SA/SEA Report, the key plans relating to this Topic Area are introduced. The list provided is not meant to be exhaustive but seeks to indicate the plans with the most relevance. The relevant plans for this Topic Area are:

Employment and Town Centres

- National Planning Policy Framework (MHCLG, 2021)
- Planning Practice Guidance (MHCLG, 2014, 2018)
- Levelling Up White Paper (2022)
- Aviation Policy Framework (DfT 2013)
- Aviation 2050 – the Future of UK Aviation, December 2018
- Beyond the Horizon: The Future of UK Aviation – making best use of existing runways, DfT, June 2018
- Airports National Policy Statement: New runway capacity and infrastructure at airports in the South East of England, DfT, June 2018
- Flightpath to the Future, DfT, May 2022
- Jet Zero Strategy: Delivering net zero aviation by 2050, DfT, July 2022
- The Second National Infrastructure Commission Baseline Report, November 2021
- Gatwick Diamond Futures Plan 2008 – 16
- GHK Diamond Report (October 2008)
- Gatwick Diamond Local Strategic Statement (Chilmark Consulting, 2017)

- Gatwick 360 (Coast to Capital LEP, 2018)
- Local Development Framework Diamond Report (GVA Grimley)
- Northern West Sussex Economic Growth Assessment (Lichfields, 2020)
- Crawley Economic Growth Assessment Update (Lichfields, 2020)
- 2023 Economic Growth Assessment Supplementary Update (Lichfields 2023)
- One Town Crawley Economic Recovery Plan (Lichfields 2021)
- Crawley Local Plan Market Signals Assessment for Industrial and Warehouse Needs (Lichfields 2023)
- Crawley Town Investment Plan (2020)
- Employment Land Trajectory (Base Date 31 March 2023), December 2023
- Employment Land Availability Assessment (Base Date 31 March 2023) December 2023
- Employment Land Trajectories 2015 – 2030 (AMR 2018 refers)
- Retail, Commercial, Leisure and Town Centre Needs Assessment (Nexus, 2020)
- Appendix A Response to Matters 7.1 and 7.5 (Nexus Update) (December, 2023)
- Crawley College Campus Master Plan (2022)
- Town Centre SPD (CBC, 2016)
- Manor Royal Design Guide SPD (CBC, 2013)
- Manor Royal Public Realm Strategy (CBC, 2013)
- Manor Royal Economic Impact Study (2018)
- Crawley Growth Programme
- Crawley Town Centre Regeneration Programme (March 2018)
- Crawley Employment and Skills Programme 2019-2024
- Explanatory Note on Proposed Modifications to Policy EC5 and Planning Obligations Annex (CBC, December 2023)
- State of the Nation 2018-19: Social Mobility in Great Britain (Social Mobility Commission)
- Active Lives Survey 2015-17, Arts Council England
- West Sussex Minerals Local Plan (2018)

Issue: There is insufficient land supply to accommodate Crawley's business-led economic needs

- D5 With land supply in Crawley significantly constrained by a tight administrative boundary and the requirement to safeguard land at Gatwick Airport, Crawley has historically been unable to accommodate its identified employment land needs within its borough boundary. To inform the amount of economic growth to be planned for within the Functional Economic Market Area, the Northern West Sussex Economic Growth Assessment has been prepared by Lichfields on behalf CBC, Horsham District Council and Mid Sussex District Council. This study has been subsequently updated on an individual basis for Crawley to sensitivity test its initial findings and have regard to updated economic forecasts.
- D6 The most recent employment forecasts for Crawley are set out in the 2023 Economic Growth Assessment Supplementary Update. This establishes a range of economic growth forecasts for Crawley in line with Planning Practice Guidance. Of these forecasts, the Local Plan employment land requirement is identified based upon Experian Q4 2022 Baseline Job Growth projections, this representing the most appropriate basis for considering future employment land requirements from a labour demand perspective. This forecast identifies need for a minimum 113,390sqm new floorspace (26.2 hectares) new employment land to accommodate business needs in Crawley Borough to 2040. This is significantly within industrial sectors where floorspace need of 91,620sqm (22.9ha) is identified. Crawley's Employment Land Trajectory (Base Date 31 March 2023) identifies an available employment land supply pipeline of **49,903** ~~71,325~~sqm (**10.29** ~~14.49~~ha), which comprises 21,020sqm (5.32ha) office and research & design and **50,305**

~~28,883~~sqm (~~9.17~~ ~~4.97~~ha) **industrial and storage &** distribution land. The existing available office land supply pipeline meets identified quantitative office needs, although there remains a broader qualitative office need. Therefore, Crawley's employment land requirements are substantially of an industrial nature, principally in relation to B8 storage & distribution use. ~~With an existing available industrial land supply pipeline of 50,305sqm (9.17ha)~~ **Subtracting the available industrial land supply pipeline**, there remains an outstanding need for at least ~~62,737~~ ~~41,315~~sqm (~~13.73~~ ~~17.93~~ha) new land for B8 uses.

Likely evolution without the continued implementation of the Local Plan

- D7 Crawley is situated at the heart of the Coast to Capital LEP and Gatwick Diamond areas, and through its excellent transport links, clustering of businesses and ambitious growth plans, it continues to be the leading employment destination in the sub-region. Crawley's economy has responded well to the economic challenges posed by the Covid-19 pandemic, and is forecasted to consolidate, recover and grow over the Plan period to 2040. There remains a strong demand from businesses seeking to locate in the borough, as well as demand for new floorspace from existing businesses in Crawley that are seeking to grow. Identification of new business land and floorspace is required if the borough, and more broadly the sub-regional economy, is to continue to thrive. Through the Local Plan, steps can be taken to plan positively for continued economic recovery and growth, planning to accommodate identified business-led economic needs and respond to market trends to support the economic function of Crawley and that of the wider functional economic market area. Through policies that support the business function of Manor Royal, protect the designated main employment areas for economic growth, and identify new land for business, the Plan can help to accommodate Crawley's job growth needs over the Plan period.
- D8 Without a Local Plan in place, underpinned by up-to-date evidence, there is risk that Crawley's economic function, and that of the wider area, may be undermined. Without policies that support economic growth, including through the protection of existing main employment areas and the identification of new employment land, Crawley's economy could be undermined and economic recovery stifled. Such a scenario will present challenges to growth in Crawley, increasing risk that with an insufficient employment land supply, new investment will be deterred and existing businesses seeking to grow could be displaced elsewhere, potentially outside the sub-region entirely.
- D9 The NPPF is clear that planning policies should pro-actively encourage sustainable economic growth, recognising and addressing the specific locational requirements of different sectors, including storage and distribution. More locally, the Coast to Capital LEP Strategic Economic Plan identifies that demand for new business land outstrips the available supply, outlining its support for the delivery of new business space for the area. A number of new employment sites are planned within the Gatwick Diamond to meet a variety of needs, including the office-led Horley Strategic Business Park, Burgess Hill Science & Technology Park (research & innovation) and in Horsham District through North Horsham and at Novartis Site (smaller business spaces and start-ups). These sites will all add to the overall economic strength of the Gatwick Diamond, but none would be meeting the storage & distribution needs of Crawley, with demand particularly focussed on the area given its proximity to Gatwick Airport and the strategic road network. This, coupled with an identified need and strong market demand for B8 floorspace, adds weight to the pressing need to identify new land for storage & distribution-led employment.

What the Local Plan can and cannot do

- D10 The Aviation Policy Framework (March 2013) outlines that land outside existing airports that may be required for airport development in the future needs to be protected against incompatible development until the government has established any relevant policies and proposals in

response to the findings of the Airport Commission. The Airports National Policy Statement (June 2018) supports expansion at Heathrow. However, the draft national Aviation Strategy, Aviation 2050, which was published in December 2018, after the Airports National Policy Statement, states that it is still prudent to continue with a safeguarding policy at other airports. This document has not yet been progressed further, and neither has the National Infrastructure Commission assessment of the needs case for future runways it refers to. There is not, therefore, any certainty in government policy that land at Gatwick is no longer required to be safeguarded.

- D11 Local Plans must be in conformity with the relevant national policy. Therefore, the Local Plan will be required to continue safeguarding land for a possible southern runway at Gatwick Airport. The land required to be safeguarded will be predominantly based on the Gatwick Airport Masterplan 2019. However, given the significant impact safeguarding has on Crawley Borough’s ability to meet its economic needs and the information now in the published Gatwick Airport Masterplan about proposed uses for the safeguarded land, the council does not consider that the safeguarded land, as shown in the Gatwick Airport Master Plan 2019, makes for an efficient use of land.
- D12 Alongside the initial Regulation 19 consultation, the council held a ‘call for sites’ through which a number of sites for new employment land were identified and promoted to the council. Many of these sites are subject to Gatwick Airport safeguarding and are on land that would be required for the physical construction of a southern runway or the safety zones around it.
- D13 The exception to this is the land at Gatwick Green, which is an area subject to Gatwick Airport safeguarding but which the Gatwick Master Plan identifies for a large expanse of surface airport parking. The council does not consider this an efficient use of land. Given that the airport is making for an efficient use of its existing on-airport parking locations through a new multi-storey car park and robotic parking, it is considered that the land at Gatwick Green can be used more efficiently to help meet Crawley’s economic needs, without prejudicing the delivery of a southern runway. Therefore, the Local Plan supports the allocation of a new industrial/warehouse-led Strategic Employment Site at Gatwick Green.
- D14 This will be brought forward alongside policies that support the protection and intensification of the designated main employment areas for economic uses, specifically protecting small extensions to Manor Royal where appropriate. The allocated Horley Business Park in Reigate & Banstead Borough will help to meet some of Crawley’s unmet business land needs from the 2015 Local Plan, and through existing permissions, Crawley is able to meet its identified office needs over the forthcoming Plan period to 2040.

Indicator No.	Indicator	Crawley Data	Trend	Data Sources
D1	Comparison of actual and projected gross delivery rates for Class E Office, B2/B8 Industrial and Storage & Distribution employment floorspace 2015-2021	Gross B-class delivery (excluding ‘churn’) as a percentage of projected delivery rate (from EGA) 2015/16 Gross delivery exc; churn (sqm) Office: 12,062 Industrial: 8,872 Total: 20,934 Projected delivery rate (sqm) Office: 9,281 Industrial: 9,865 Total: 19,146 Gross B-class delivery (excluding ‘churn’) as a percentage of projected delivery rate	The six years since Local Plan 2015 adoption have seen Crawley deliver very close to its projected gross B-class floorspace delivery. The last few years have seen a slowing of delivery, which may be linked to the economic	Crawley Authority Monitoring Reports 2015-21. WSCC HEDNA data.

Indicator No.	Indicator	Crawley Data	Trend	Data Sources
		<p>Office: 130% Industrial: 90% Total: 109%</p> <p><u>2016/17</u> Gross delivery exc; churn (sqm) Office: 16,646 Industrial: 15,172 Total: 31,818</p> <p>Projected delivery rate (sqm) Office: 9,281 Industrial: 9,865 Total: 19,146</p> <p>Gross B-class delivery (excluding 'churn') as a percentage of projected delivery rate Office: 179% Industrial: 154% Total: 166%</p> <p><u>2017/18</u> Gross Delivery exc; churn sqm Office: 20,306 Industrial: 2,345 Total: 22,651</p> <p>Projected delivery rate (sqm) Office: 9,281 Industrial: 9,865 Total: 19,146</p> <p>Gross B-class delivery (excluding 'churn') as a percentage of projected delivery rate Office: 219% Industrial: 24% Total: 118%</p> <p><u>2018/19</u> Gross Delivery exc; churn sqm Office: 7,744 Industrial: 15,882 Total: 23,626</p> <p>Projected delivery rate (sqm) Office: 9,281 Industrial: 9,865 Total: 19,146</p> <p>Gross B-class delivery (excluding 'churn') as a percentage of projected delivery rate Office: 83% Industrial: 161% Total: 123%</p> <p><u>2019/20</u> Gross Delivery exc; churn sqm Office: 416 Industrial: 7,796 Total: 8,212</p> <p>Projected delivery rate (sqm)</p>	<p>impacts of the Covid-19 pandemic.</p>	

Indicator No.	Indicator	Crawley Data	Trend	Data Sources
		<p>Office: 9,281 Industrial: 9,865 Total: 19,146</p> <p>Gross B-class delivery (excluding 'churn') as a percentage of projected delivery rate Office: 4% Industrial: 79% Total: 43%</p> <p><u>2020/21</u> Gross Delivery exc; churn sqm Office: 1,455 Industrial: 2,931 Total: 4,386</p> <p>Projected delivery rate (sqm) Office: 9,281 Industrial: 9,865 Total: 19,146</p> <p>Gross B-class delivery (excluding 'churn') as a percentage of projected delivery rate Office: 16% Industrial: 30% Total: 23%</p>		
D2	<p>Comparison of actual and projected losses of Class E Office, B2/B8 Industrial and Storage & Distribution employment floorspace to non-employment uses 2015-2021</p>	<p>Completed losses as a % of projected loss rate <u>2015/16</u> Completed losses to non B-uses (sqm) Office: 11,706 Industrial: 175 Total: 11,881</p> <p>Projected loss rate (sqm) Office: 4,803 Industrial: 4,092 Total: 8,895</p> <p>Completed losses as a % of projected loss rate Office: 244% Industrial: 4% Total: 134%</p> <p><u>2016/17</u> Completed losses to non B-uses (sqm) Office: 17,955 Industrial: 3,003 Total: 20,958</p> <p>Projected loss rate (sqm) Office: 4,803 Industrial: 4,092 Total: 8,895</p> <p>Completed losses as a % of projected loss rate: Office: 374% Industrial: 73% Total: 236%</p>	<p>Significant PDR losses to residential have initially informed a higher than anticipated % of losses versus projected losses. 2017/18 and 2018/19 saw a reversal of this trend, possibly a result of Article 4 Directions. 2019/20 and 2020/21 have seen a resumption of a trend where office losses are higher than anticipated. The is set against there being a zero loss of industrial space over these monitoring years.</p>	<p>Crawley Authority Monitoring Reports 2015-21.</p> <p>WSCC HEDNA data.</p> <p>CBC PDR monitoring.</p>

Indicator No.	Indicator	Crawley Data	Trend	Data Sources
		<p><u>2017/18</u> Completed losses to non B-uses (sqm) Office: 2,353 Industrial: 3,180 Total: 5,715 Projected loss rate (sqm) Office: 4,803 Industrial: 4,092 Total: 8,895 Completed losses as a % of projected loss rate: Office: 53% Industrial: 78% Total: 64%</p> <p><u>2018/19</u> Completed losses to non B-uses (sqm) Office: 573 Industrial: 0 Total: 573 Projected loss rate (sqm) Office: 4,803 Industrial: 4,092 Total: 8,895 Completed losses as a % of projected loss rate: Office: 12% Industrial: 0% Total: 6%</p> <p><u>2019/20</u> Completed losses to non B-uses (sqm) Office: 9,728 Industrial: 0 Total: 9,728 Projected loss rate (sqm) Office: 4,803 Industrial: 4,092 Total: 8,895 Completed losses as a % of projected loss rate: Office: 203% Industrial: 0% Total: 109%</p> <p><u>2020/21</u> Completed losses to non B-uses (sqm) Office: 2,868 Industrial: 0 Total: 2,868 Projected loss rate (sqm) Office: 4,803 Industrial: 4,092 Total: 8,895</p>		

Indicator No.	Indicator	Crawley Data	Trend	Data Sources
		Completed losses as a % of projected loss rate: Office: 60% Industrial: 0% Total: 32%		
D3	Comparison of net employment floorspace delivery with 'baseline' scenario projected requirement	<p><u>2015/16</u> Net delivery (sqm) Office: -4,813 Industrial: 6,879 Total: 2,066</p> <p>Baseline Requirement (sqm) Office: 4,478 Industrial: 5,773 Total: 10,251</p> <p>Delivery as a % of requirement: Office: -108% Industrial: 119% Total: 20%</p> <p><u>2016/17</u> Net delivery (sqm) Office: -1,309 Industrial: 10,669 Total: 9,360</p> <p>Baseline Requirement (sqm) Office: 4,478 Industrial: 5,773 Total: 10,251</p> <p>Delivery as a % of requirement: Office: -23% Industrial: 185% Total: 91%</p> <p><u>2017/18</u> Net delivery (sqm) Office: 17,771 Industrial: -4,998 Total: 12,773</p> <p>Baseline Requirement (sqm) Office: 4,478 Industrial: 5,773 Total: 10,251</p> <p>Delivery as a % of requirement: Office: 398% Industrial: -87% Total: 125%</p> <p><u>2018/19</u> Net delivery (sqm) Office: 7,171 Industrial: 15,882 Total: 23,053</p> <p>Baseline Requirement (sqm) Office: 4,478 Industrial: 5,773 Total: 10,251</p> <p>Delivery as a % of requirement:</p>	<p>Taking losses into account, net delivery of employment space over the period 2015-19 reached 115% of the identified baseline requirement. The last two years have seen consecutive negative net delivery for offices. This has meant that for the six years of the Plan, although net industrial delivery has been greater than projected, the office losses mean that total net completions (office and industrial) only meet 76% of the baseline requirement.</p>	<p>Crawley Authority Monitoring Reports 2015-21.</p> <p>WSCC HEDNA data.</p> <p>CBC PDR monitoring.</p>

Indicator No.	Indicator	Crawley Data	Trend	Data Sources
		Office: 160% Industrial: 275% Total: 225% <u>2019/20</u> Net delivery (sqm) Office: -9,312 Industrial: 7,796 Total: -1,516 Baseline Requirement (sqm) Office: 4,478 Industrial: 5,773 Total: 10,251 Delivery as a % of requirement: Office: -208% Industrial: 135% Total: -15% <u>2020/21</u> Net delivery (sqm) Office: -1,413 Industrial: 2,667 Total: 1,254 Baseline Requirement (sqm) Office: 4,478 Industrial: 5,773 Total: 10,251 Delivery as a % of requirement: Office: -32% Industrial: 46% Total: 12%		

Issue: Existing office stock does not match the current or long-term needs of the changing economy

D15 Qualitative feedback from business organisations and land agents, in addition to evidence set out in the 2020 EGA, identifies a mismatch between the type of office stock that is currently available in Crawley and that which is required meet the needs of the market. The 2020 EGA finds that the market demand is significantly for Grade A specification office stock, frequently bespoke rather than speculative, and across a range of sizes. This is in contrast to the available supply, which is largely composed of older Grade B stock. This has resulted in the Crawley office market being somewhat suppressed, with the limited available Grade A stock quickly taken up, and lower grade stock tending to remain vacant or becoming vulnerable to other economic uses. The EGA finds that the lack of quality office provision is a key challenge facing the functional economic market area, advising that Crawley is well placed to help meet this qualitative need, provided the right quality of office space can be provided. The newly opened Create Building, and other Grade A office development, can provide a catalyst to reinvigorate the Northern West Sussex office market, particularly as it adapts to changed work habits since the Covid-19 pandemic.

Likely evolution without the continued implementation of the Local Plan

D16 Without a dedicated office policy in the Local Plan, office uses can still be delivered as part of the broader range of B-use class typologies that are supported across the borough. However, this is

likely to result in the status quo being retained, with a significant supply of outdated stock, meaning that Crawley, and consequently the wider sub-region, will continue to lack the supply of high quality office provision that the market is seeking.

- D17 In the absence of a Local Plan, proposals for office development would be required to demonstrate that the sequential test is satisfied, adding an unnecessary obstacle where office development is proposed outside the Town Centre, an approach that fails to take account of the established role of Crawley’s designated main employment areas.
- D18 A specific office-focused policy can more explicitly support the delivery of the A Grade Specification offices that the market is seeking, removing unnecessary obstacles where offices are, quite appropriately, proposed in the designated main employment areas.

What the Local Plan can and cannot do

- D19 The EGA discusses how the Local Plan can 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 supporting the role of Crawley as a competitive town centre.
- D20 The EGA identifies a significant quantitative need for industrial floorspace, and a smaller quantitative need for office floorspace which can be met through the existing employment land supply pipeline. The Local Plan can support the delivery of clear qualitative need for offices that is not currently being addressed. It would not be appropriate for the Local Plan to designate a specific location(s) for office use only, as this would likely be unduly prescriptive, and would not help meet identified industrial needs. Notwithstanding this, the Local Plan can support and encourage the provision of high quality office uses, whilst recognising that there is a need to balance this with the delivery of industrial land and floorspace.
- D21 The Local Plan is unable to influence the potential loss of office space to residential use through Prior Approval, although the council has introduced an Article 4 Direction at Manor Royal and has made additional Directions at identified Main Employment Areas.

Indicator No.	Indicator	Crawley Data	Trend	Data Sources
D1 – D3	As Above	As Above	As Above	As Above.
D4	Movement of floorspace between B1a/B1b (i.e. ‘office’) and B1c/B2/B8 (i.e. ‘industrial’) uses 2015-21	<u>2015/16</u> Office to Industrial (sqm): 5,169 Industrial to Office (sqm): 1,818 Net increase in Office (sqm): -3,351 <u>2016/17</u> Office to Industrial (sqm): 0 Industrial to Office (sqm): 1,500 Net increase in Office (sqm): 1,500 <u>2017/18</u> Office to Industrial (sqm): 0 Industrial to Office (sqm): 4,163 Net increase in Office (sqm): 4,163 <u>2018/19</u> Office to Industrial (sqm): 0 Industrial to Office (sqm): 0 Net increase in Office (sqm): 0	There was some movement of floorspace between office and industrial uses during the six-year period. The implications do not seem particularly dramatic for the balance between office and industrial floorspace, with only a slight cumulative trend away from the latter towards the former being apparent.	Crawley Authority Monitoring Reports 2015-21. WSCC HEDNA data.

Indicator No.	Indicator	Crawley Data	Trend	Data Sources
		<u>2019/20</u> Office to Industrial (sqm): 0 Industrial to Office (sqm): 0 Net increase in Office (sqm): 0 <u>2020/21</u> Office to Industrial (sqm): 0 Industrial to Office (sqm): 264 Net increase in Office (sqm): 264		
D5	Consented B1a/B1b losses to residential use via planning permission and prior approval	<u>2015/16</u> Office change to resi via prior approval (sqm): 16,723 Office change to resi via planning permission (sqm): 322 Total office to resi consented (sqm): 17,045 <u>2016/17</u> Office change to resi via prior approval (sqm): 9,330 Office change to resi via planning permission (sqm): 5,083 Total office to resi consented (sqm): 21,994 <u>2017/18</u> Office change to resi via prior approval (sqm): 8,111 Office change to resi via planning permission (sqm): 88 Total office to resi consented (sqm): 8,199 <u>2018/19</u> Office change to resi via prior approval (sqm): 263 Office change to resi via planning permission (sqm): 2,237 Total office to resi consented (sqm): 2,500 <u>2019/20</u> Office change to resi via prior approval (sqm): 100 Office change to resi via planning permission (sqm): 0 Total office to resi consented (sqm): 100 <u>2020/21</u> Office change to resi via prior approval (sqm): 689 Office change to resi via planning permission (sqm): 0 Total office to resi consented (sqm): 689	Permitted development schemes have in recent years accounted for the majority of the office floorspace affected by office-to-residential changes of use. 2018/19 saw a fall in the amount of office floorspace lost to residential through prior approval, and the overall total amount of office space lost to residential when compared with the preceding years. This trend has continued in 2019/20 and 2020/21.	Crawley Authority Monitoring Reports 2015-21. WSCC HEDNA data. CBC PDR monitoring.

Issue: An evidenced local skills gap means that a significant proportion of Crawley's residents are less able to access higher skilled and higher paying jobs in the borough.

- D22 Crawley is well established as a key employment destination in the Gatwick Diamond and is home to over 3,400 active businesses which generate 85,000 jobs. However, there is a recognised disparity between the generally lower qualification levels and income achieved by people that live in Crawley compared with those of the in-commuting workforce, which are on average higher. This is reflected in Crawley's position close to the bottom of social mobility rankings published in the State of Nation report, where Crawley ranks 304th out of 324 local authorities.
- D23 Crawley's resident workforce has a lower than average level of Qualifications at NVQ4 and above (33.2%) when compared to the South East region (41.4%). Whilst positive steps are being made, the borough is still behind its neighbouring authorities of Horsham (42.3%) and Mid Sussex (46.3%).
- D24 Reflecting the skills' profile, a lower than average proportion of Crawley residents are employed in higher skilled, higher earning occupations when compared to the South East and Great Britain averages. As identified in the 2020 EGA, average weekly earnings for Crawley residents (£558.70) are significantly lower than those for residents living in Horsham (£649.80) and Mid Sussex (£645.40) and remain below the South East England average (£632.80). The average weekly wage for someone working in Crawley Borough (£632.50) remains higher than the average weekly wage of someone living in the Crawley Borough.
- D25 Addressing the skills gap is vital to enabling local people to better access higher skilled employment, creating the right conditions for career opportunities within the borough. It is also important that Crawley offers the right skills' profile to cater for the needs of current and future employers. The Gatwick 360 Strategic Economic Plan, prepared by Coast to Capital LEP, identifies pockets of lower skills, specifically referencing Crawley, as a barrier to growth, and establishes the need to create skills for the future as one of its eight economic priorities. Through the council's own research, it is estimated that £49 million GVA per annum is lost through skills' shortages and working to address the skills' gap will help ensure that Crawley continues to attract inward investment as a preferred location for business. More recently, the economic implications of the Covid-19 pandemic have resulted in redundancies, and as the borough continues its economic recovery, it is vital that support is in place for those residents who may require training or assistance to access the job market.

Likely evolution without the continued implementation of the Local Plan

- D26 Through the Crawley Employment and Skills' Plan, launched in 2016, the council has been able to make a significant contribution to addressing the skills gap. Its flagship projects, which include the borough having achieved Construction Industry Training Board (CITB) Skills Academy status, introducing the Developer and Partner Charter and the creation of the council's flagship project, Employ Crawley, have helped address skills gaps in the local workforce to benefit local people and businesses. Through creating different routes to education and higher value jobs, it has helped to empower some of the most disadvantaged residents and has promoted and enhanced the council's commitment to making Crawley a Living Wage zone. Through the updated Crawley Employment and Skills Programme 2019-2024 and joint working with stakeholders, the council is continuing its work to enable Crawley residents to access better quality job opportunities within the town. However, there is a significant opportunity for the Local Plan to build upon this foundation, helping to further narrow the skills gap and positively address a key economic priority of the Coast to Capital LEP.

What the Local Plan can and cannot do

D27 The Local Plan cannot directly ensure that a greater proportion of Crawley residents achieve higher qualifications and access better jobs, though by introducing a skills policy, it can ensure that development in the borough contributes to addressing what is a demonstrable skills gap. In doing so, the Plan can help to facilitate opportunities for existing and future Crawley residents and enhance the work of the Crawley Employment and Skills Programme, supporting economic recovery, diversification and growth and helping to improve social mobility in the borough.

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
D6	Working age population with other or no formal qualifications	7.6% (ONS 2018/19 EGA 2020) 11.5% (ONS 2020/21)	SE = 10.5% United Kingdom = 14.8% (ONS 2018/19 EGA 2020)	This data set can fluctuate, and over the last 10 years has ranged from a low of 7% (2017) to a high of 22.6% (2020). The mean average over the last 10 years is 13.5%.	EGA 2020 ONS
D7	Working age population qualified to at least NVQ Level 4 or higher	21.5% (2011 Census) 26.9% (EGA 2014) 33.2% (ONS 2018/19 EGA 2020)	SE = 29.9% England = 27.4% (2011 Census) SE = 36.8% Great Britain = 34.4% (EGA 2014) SE = 41.4% United Kingdom = 38.4% (EGA 2020)	Crawley still has the lowest percentage of the population with at least a NVQ Level 4 qualification within West Sussex, which is below both the South East and national figure	Census 2011 EGA 2014 EGA 2020 ONS

Issue: The changing nature of the Town Centre and An Increasing Town Centre Residential Population

D28 The Local Plan 2015 introduced increased flexibility to support regeneration in Crawley Town Centre, rather than aiming, at a time of uncertainty for the retail market, to specifically fulfil retail capacity by specifically allocating sites for retail-led development. Key Opportunity Sites were identified within the Town Centre, each with significant potential for redevelopment and/or alternative uses including residential. The flexible approach of the Local Plan was complemented by the Town Centre Regeneration Strategy which promoted improvements to the public realm in order to encourage investment by new retailers.

D29 This approach has been successful, with new residential development north of the Boulevard already occupied and other sites under construction or approved. Public realm improvements in Queens Square and Queensway/Pavement have encouraged investment and new occupiers which have in turn enlivened the Town Centre, enhancing its vitality and viability. However, the future for town centres remains uncertain, particularly as the economic impacts post-COVID-19 pandemic become clearer, and with a growing trend towards e-retailing putting many town centre shops under pressure, it is vital that Crawley Town Centre is able to adapt and thrive.

D30 The Crawley Retail, Commercial Leisure and Town Centre Neighbourhood Needs Study 2020 and the 2023 Nexus Update has provided up-to-date information on the capacity for new retail and commercial leisure floorspace within the Town Centre. It has found that Crawley continues to perform well, retaining a good balance of retail and leisure uses, which, supported by public realm improvements and a growing town centre residential population, has helped ensure that Crawley remains a competitive and successful town centre. However, with town centres continuing to face challenges, it is important that Crawley continues to adapt and remain

competitive. Given the changing nature of the retail economy, the Local Plan will continue to apply a flexible approach to the mix of uses accommodated within the Town Centre, balancing a strong retail heart with a wider range of supporting uses that attract footfall and generate interest and vibrancy.

- D31 At the heart of Crawley is the Town Centre, planned as a retail, commercial and civic centre as part of the New Town. It is an important sub-regional destination for retail and leisure, and a designated Main Employment Area in the Local Plan. Historically, there had been very limited residential accommodation in the centre, though recent years have seen an increase in its residential population and the Local Plan recognises the Town Centre as a sustainable place for people to live.
- D32 The number of residents living in the Town Centre has significantly increased, and from a starting point of 214 residential units in 2014, and through both planned development and prior approval schemes there are now over 1,000 dwellings in the Town Centre, and a residential population of around 1,500 people. It is anticipated that, over the Plan period to 2040, a further 1,900 dwellings will come forward in the Town Centre, bringing the total to just over 3,000 residential units.
- D33 With significant new residential developments planned it is recognised that the Town Centre, as well as well as being a retail, leisure and employment destination, is becoming a neighbourhood in its own right. Having a residential population benefits town centre viability and vitality and enables people to live in a highly sustainable location with excellent public transport links. However, the Town Centre does not currently offer the quantum and range of community services and facilities that are provided within Crawley's purpose planned neighbourhoods, for example community spaces, education, healthcare and open and recreational space. Where Town Centre residential has come forward through prior approval, it has not been possible to secure developer contributions towards the infrastructure provision that is needed. Moving forward, it will be important to ensure that the facilities and services required to support the day-to-day needs of a growing Town Centre residential population are provided.

Likely evolution without the continued implementation of the Local Plan

- D34 Town centres are facing unprecedented challenges, and policy flexibility is needed to ensure that Crawley Town Centre is best placed to respond positively to market signals, adapt, and remain competitive. Updated policies are important to supporting and encouraging investment and development that enhances the vitality and viability of the town centre, and which resists development that would undermine the Town Centre. Without a Local Plan in place, the national planning guidance of the NPPF would to an extent support the town centre, though this approach lacks the local specificity that is needed to unlock Key Opportunity Sites, promote a range of uses and make efficient use of space in a manner that retains Crawley's position as a vibrant and competitive town centre.
- D35 Without a Local Plan in place, it will be challenging to ensure that residential development in the Town Centre comes forward in a well-planned and designed manner that contributes positively to Town Centre vitality and viability and people's quality of life. Without a Local Plan in place, it would not be possible to secure, where planning permission is required, developer contributions towards the infrastructure and services that are needed to support the Town Centre residential population.
- D36 Whilst it is possible that without a Local Plan, some of the facilities and services needed to support the Town Centre residential population may come forward through the market, it is recognised that some of these uses, for example community facilities, are not identified by the NPPF as main town centre uses, and therefore national policy would not necessarily help address some requirements. Further, whilst residential uses in the Town Centre is supported, there is a need to ensure an appropriate balance between new residential development and other

main town centre uses, in order to ensure that residential use is appropriately planned for in a way that enhances, and does not undermine, town centre vitality and viability.

What the Local Plan can and cannot do

- D37 The Local Plan can help support a vibrant and competitive town centre that provides for a 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 mixed use developments and promoting flexible policies that will promote a vibrant heart based around a mix of main town centre uses, attract footfall and promote an attractive and pleasant town centre environment. It can also go some way to ensuring that the Town Centre is fully accessible by sustainable modes of transport.
- D38 However, there are other aspects to improving the Town Centre that are largely beyond the Local Plan’s control, such as tackling antisocial behaviour (although measures such as Secured by Design can play a role), the nationwide shift towards online retailing, and more widely the economic implications of COVID-19.
- D39 The Local Plan can ensure that residential development in the Town Centre comes forward on a planned basis, that provides a good quality of life for its occupiers, for example through securing appropriate space standards, noise mitigation, amenity and waste servicing. Where planning permission is required, it is possible to ensure that residential uses do not undermine existing town centre operations, for example the evening and night time economy, through applying the ‘agent of change’ principle. The Local Plan can help secure, where planning permission is required, developer contributions that are essential to supporting infrastructure, facilities and services that are needed to support its residential population. Equally, the Local Plan can put in place a policy framework to support delivery of a wider range of uses that are needed to support the growing residential population.
- D40 The Local Plan cannot control residential development introduced through permitted development rights, nor associated issues such as lack of bin storage and supporting facilities, unless an Article 4 Direction is put in place. It cannot prevent movement between Use Classes where this is subject to a national permitted development right. However, the designation of Queens Square and The Broadway Conservation Area does mean that certain permitted development rights no longer apply within that area.

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
D8	Number of residential dwellings built in the Town Centre	2018/19 = 178 units 2019/20 = 41 units 2020/21 = 317 units 2021/22 = 95 units	N/A	The rate of increase in residential dwellings fluctuates year-on-year, reflecting the importance of a small number of large developments in contributing to the total.	Crawley Authority’s Monitoring Report WSCC HEDNA data
D9	Vacancy rate for ground floor units in Primary Shopping Area	Jan 2020 = 9.6% Jan 2021 = 12% Apr 2022 = 12.5% Jan 2023 = 12.4%	South East Jan 2020 = 9.7% South East Jan 2021 = 11.7% South East Apr 2022 = 9.9%	First year this Indicator has been monitored.	Crawley Authority’s Monitoring Report Springboard vacancy rate data

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
D10	Completed Town Centre Neighbourhood Facilities by sqm floorspace.			First year this Indicator will be monitored	Crawley Authority's Monitoring Report WSCC HEDNA Data

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. Any growing urban area will place additional stress on the natural environment, including the aquatic environment. In addition, green infrastructure routes are common within the town and these, in conjunction with waterways and 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.
- E2 The 25 Year Environment Plan, the National Pollinator Strategy 2014, West Sussex’s Pollination Action Plan 2019-2022 and Environment Act 2021 are current national and county plans that are encouraging a movement towards a net gain in biodiversity and natural capital and supporting nature recovery. The mechanisms for ensuring net gain occurs are still being implemented as there are a variety of smaller interventions and design mechanisms that could contribute to creating a net gain standard however, Defra and Natural England’s most up-to-date Biodiversity Metric is recognised as a method of quantifying biodiversity into unit values and in doing so express how compensation onsite and offsite is required to lead to an increase in biodiversity net gain, whilst following the mitigation hierarchy.
- E3 Within Crawley’s tight administrative boundaries smaller proposed interventions and urban innovative solutions are necessary to combat natural capital decline through new development putting pressure on available open space. At least a measurable 10% net gain requirement is expected on site for new developments. Biodiversity Net Gain requirements are in addition to existing habitats and species protections.

Relevant Plans, Policies and Programmes

- E4 For the purposes of this draft SA/SEA Report, 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 (MHCLG, 2021)
- Planning Practice Guidance (MHCLG, 2016)
- EU Habitats Directive 99/43/EEC (1992)
- Environment Act 2021
- 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)
- Green Infrastructure SPD (CBC, 2016)

Landscape/Countryside

- National Planning Policy Framework (MHCLG, 2021)

- Crawley Landscape Character Assessment (CBC, 2012)
- National Design Guide (MHCLG October 2019)
- National Model Design Code, DLUHC, 2021
- Historic Environment Good Practice Advice Planning Note 3: The setting of Heritage Assets Historic England, 2017
- Building Better, Building Beautiful Commission (Interim draft MHCLG July 2019)
- High Weald AONB Management Plan (2019-2024)
- Built-Up Area Boundary Review (CBC, 2015)
- Crawley Open Space, Sport and Recreation Assessment (2020) The Environment Partnership
- Crawley Playing Pitch Strategy (2020) 4Global Consulting
- West Sussex Sustainability Strategy (2015-2019)
- West Sussex Sustainability Action Plan 2015-2019
- West Sussex Landscape Character Assessment, (Land Management Guidelines for Northern Vales, High Weald Forests and adjacent High Weald) (WSCC, 2003)
- High Weald AONB Management Plan 2019-2024 (High Weald Joint Advisory Committee, 2019)
- Residential Developments and Trees (Woodland Trust, 2019)
- Essex Design Guide Essex Local Authorities Essex Planning Officers Association, 2018

Biodiversity

- The Conservation of Habitats and Species Regulations 2017
- Environment Act 2021
- National Planning Policy Framework, DLUHC (2021)
- Sussex North Water Neutrality Study: Part C – Strategy, JBA Consulting (November 2022)
- Water Neutrality Study Part B: In Combination, JBA Consulting (26 April 2022)
- Natural England Position Statement, Natural England (14 September 2021)
- Water Neutrality Study Part A: Individual Local Authority Areas (Crawley and Chichester) JBA Consulting (July 2021)
- Horsham Local Plan Water Neutrality Technical Note, Aecom (July 2021)
- Water Cycle Study – Crawley Addendum, JBA Consulting (January 2021)
- Gatwick Sub-Regional Water Cycle Study, JBA Consulting (August 2020)
- Securing a resilient future for water in the South East: Our Water Resources Management Plan for 2020-70, Southern Water (December 2019)
- National Planning Policy Framework (MHCLG, 2021)
- Net Gain: Consultation Proposals (DEFRA, 2018)
- 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)
- Pollinator Action Plan 2019-2022 (WSCC, 2019)
- National Pollinator Strategy: for bees and other pollinators in England 2014-2024 (Defra, 2014)
- A Green Future: Our 25 Year Plan to Improve the Environment (Defra, 2018)
- Environment Bill (2019/2020)
- EcoServ (Sussex Wildlife Trust, 2019)
- Urban Greening for Biodiversity Net Gain: A Design Guide (London Wildlife Trust/Mayor of London, 2021)
- Biodiversity Net Gain for local authorities (PAS, website)

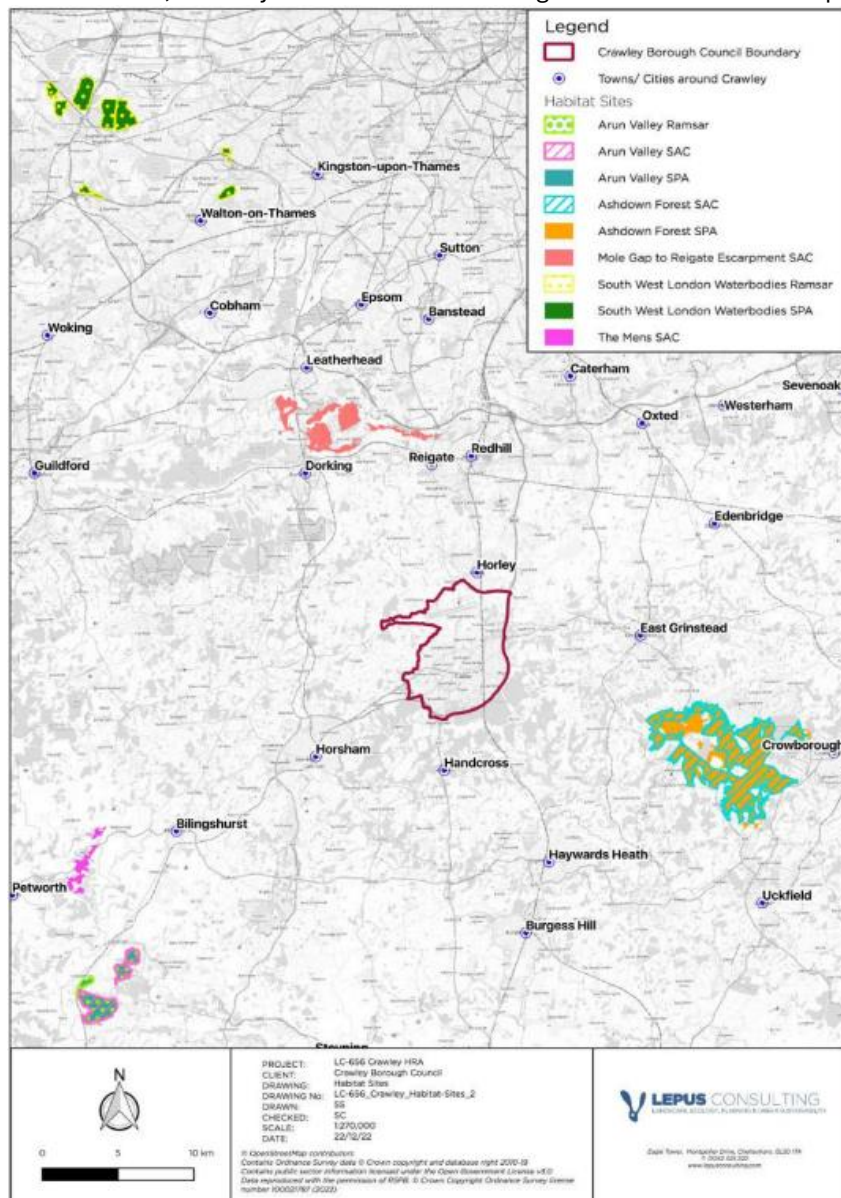
Issue: Additional development levels is increasing water supply consumption, potentially impacting Internationally Designated Sites

E5 There are no Special Protection Areas (SPAs), Special Areas of Conservation (SACs) or Ramsar sites within the borough. However, the following sites have been identified as needing further consideration against potential impacts associated with the Crawley Borough Local Plan (alone and in-combination):

- Ashdown Forest SAC;
- Ashdown Forest SPA;
- Mole Gap to Reigate Escarpment SAC;
- South West London Waterbodies SPA;
- South West London Waterbodies Ramsar;
- Arun Valley SPA;
- Arun Valley SAC;
- Arun Valley Ramsar; and
- The Mens SAC

The council has published a HRA Report alongside the Local Plan and the SA which considers potential impacts on each of these. Their location in relation to Crawley are shown on Map E1 below.

Map E1: Habitats sites within HRA study area
(Figure 5.1 extract, Crawley Local Plan Habitats Regulations Assessment Report, Lepus, 2023)



- E6 Ashdown Forest SPA and SAC are designated for heathland, 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. The South West London Waterbodies SPA and Ramsar is designated for Gadwall and Shoveler. The Arun Valley SAC is designated for the Little Whirlpool Ram's-Horn Snail – providing one of the three main population centres for this species of snail in the UK. The Arun Valley SPA is designated for the Bewick Swan and assemblage of water fowl that the site supports, including on lowland meadows, wet grassland, swamp, water-margin vegetation and ditch systems habitats. The Arun Valley Ramsar is designated for a number of British Red Data Book species of invertebrates and plant species. The Mens SAC is an area of ancient woodland which supports a significant population of Barbastelle Bat.
- E7 The HRA Report considers the following potential impact pathways:
- Changes to air quality;
 - Hydrological changes (to include water abstraction, water levels and water pollution);
 - Habitat loss and fragmentation (to include offsite habitat availability/management and loss of habitat connectivity); and
 - Public access and disturbance (to include recreational disturbance and urbanisation threats).
- E8 As set out in Section 6 above, a significant concern was raised by Natural England in relation to potential impacts on the Arun Valley sites due to water abstraction. On this basis, new development must not add to this negative impact. This means that development in Crawley, where it is located within the Sussex North Water Supply Zone, will have to demonstrate that it will not increase pressure on water resources. This can be achieved by making development “water neutral”, where for every new development, total water use in the region after the development must be equal to or less than the total water-use in the region before the new development.

Likely evolution without the continued implementation of the Local Plan

- E9 Water companies must produce a Water Resource Management Plan (WRMP) which defines how they will maintain a balance of water supply to water demand. Part of the current Southern Water WRMP (WRMP19) is a strategy to reduce water demand on the network through a reduction in household per capita consumption and a reduction in leakage. This will effectively offset part, but not all, of the growth proposed within the emerging Local Plans.
- E10 The guidance from Natural England provided at the time of their Position Statement confirmed that applications which could demonstrate they would not have an additional impact on water supply resources could be permitted. This has allowed for some screening of individual applications to take place, and a limited number of applications to be approved. The responsibility for this would lie with Crawley LPA as the Competent Authority. Unless development can show it can achieve water neutrality alone, then no development would be able to take place due to the Natural England Position Statement, until such a time as the Southern Water measures allow for a certain amount of development to take place within the Sussex North Water Resource Zone or a Southern Water strategic solution has been put into place which removes the need for water supply abstraction from locations which affect the Arun Valley Habitats sites. However, this would still need some Implementation Scheme which is agreed with the other affected Local Authorities in order to demonstrate there is no impact in-combination with the other plans and programmes across the Sussex North Water Resource Zone. How far on an individual basis it would be possible to consider the legal requirement for in-combination effects is limited, with significant potential for double counting and contradictory decisions. In addition, it is not considered the Development Management systems are set up to manage this without further work being undertaken to develop a Water

Neutrality Strategy and Implementation Scheme. Advice from Natural England confirmed a solution needed to be strategic across the whole water resource zone.

- E11 From a legal position, it is clear that ignoring the expert advice from Natural England and failing to take account of a potential significant adverse effect on important natural habitats was not reasonable and would risk the councils being challenged through the courts as the competent authority making the decisions. Therefore, this was discounted.

What the Local Plan can and cannot do

- E12 The Local Plan introduces a policy which has been agreed jointly across the Sussex North Water Resource Zone authorities to ensure development achieves water neutrality.
- E13 As set out in Section 6 and Topic Area A – Climate Change, Sustainability, Sustainable Design and Construction (paragraphs A17-A36 and monitoring indicator A6), the successful implementation of the Local Plan policy requires further work to be undertaken and agreed as part of the Implementation Scheme and ongoing monitoring.

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

- E14 The borough has designated 12 Local Wildlife Sites (LWS), formerly known as Sites of Nature Conservation Importance (SNCIs), covering 327.19 hectares in total.
- The Hawth
 - Rowley Wood
 - Worth Way
 - Worth Meadows
 - Horleyland Wood
 - Ewhurst Wood
 - Ifield Mill Pond and Surroundings
 - Tilgate Park
 - Woldhurstlea Wood
 - Willoughby Fields
 - Ifield Brook Wood and Meadows
 - Hyde Hill

Seven sites are owned by the borough council (along with a small area of the Hyde Hill Local Wildlife Site, the remainder of which in Horsham district is in private ownership), while four are in private ownership and management.

- E15 LWS 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. Ancient woodland covers 197.68 ha (4.40%) of the borough, Deciduous woodland 478.26 ha (10.64%), Ghyll woodland 25.49 ha (0.57%), lowland heathland 0.83 ha (0.02%), traditional orchard 0.88 ha (0.02%) and wood-pasture & parkland covers 41.74 ha (0.93%).
- E16 There are six 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 197.68 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.
- E17 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. It is essential that the locally distinctive features that contribute positively to the town’s sense of place are recognised, protected and, where possible, enhanced. In Crawley, these features are predominantly green spaces and the landscape structure of the town.

- E18 The NPPF requires that new development should maintain and be grounded in an understanding and evaluation of each area’s defining local character and history. It confirms that permission should be refused for development of poor design that fails to reflect local design policies and government guidance on design (contained in the National Design Guide and National Model Design Code) and the opportunities available for improving the character and quality of an area. The identification and understanding of local character is the essential first design and planning step to altering and reversing these disillusioning development outcomes. Existing character assessment is required in order to produce a vital evidence base. In 2009, the council completed a baseline character assessment of the town to help define its sense of place and this should be considered to inform the design of development proposals. While the council is bringing forward full area wide character assessments, this existing evidence will help provide an initial understanding of local context and identity. However, should the relevant full, detailed assessment not be completed where a development is proposed, developers will be expected to support the council in their delivery.
- E19 New Local Plan policy requires all new development to identify, define and be designed so that proposals respect, protect, build upon and enhance the positive aspects of existing character, significance and distinctiveness of both the site and wider area. Crucially, the form of new development needs to be carefully stitched and moulded into its surroundings, guided by the existing character of an area.
- E20 In 2008, the council undertook an initial Open Space, Sport and Recreational Assessment. This 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. Crawley’s Open Space, Sport and Recreation Study 2013 updated the council’s evidence base in relation to open space and playing pitches. A further updated Open Space, Sport and Recreation study was undertaken in 2020 to reassess the borough’s open space needs and provision. This introduced a ‘Value’ assessment, in addition to the Quantity, Quality and Accessibility criteria considered by the two previous assessments. Table E1 shows the quantity of open space within the borough identified through the 2020 Assessment.

Table E1: Open Spaces by Typology, Number and Area
(Table 7 Extract, Crawley Open Space, Sport and Recreation Study, 2020, The Environment Partnership)

Open Space Typology	Description	No.	Area (ha)	Area (%)
Allotments	Opportunities for those people who wish to grow their own produce as part of the long-term promotion of sustainability, health and social inclusion.	20	11.08	1.68
Amenity Green Space	Most commonly but not exclusively found in housing areas. Includes informal recreation green spaces and village greens.	552	91.47	13.83
Cemeteries	Cemeteries and churchyards including disused churchyards and other burial grounds.	7	13.41	2.03
Civic Spaces	Hard surfaced areas usually located within town or city centres.	5	1.09	0.16

Natural Green Space	Includes country parks, nature reserves, publicly accessible woodlands, urban forestry, scrub, grasslands, wetlands and wastelands.	96	296.62	44.85
Parks and Recreation Grounds	Includes urban parks and formal gardens. Parks usually contain a variety of facilities, and may have one of more of the other types of open space within them.	33	239.05	36.14
Play Space (Children)	Areas designed primarily for play and social interaction specifically designed as equipped play facilities for children.	76	7.77	1.18
Play Space (Youth)	Areas designed primarily for play and social interaction specifically designed as equipped play facilities for young people.	10	0.88	0.13
TOTAL		799	661.37	100

- E21 There is currently 2.13ha of park and recreation grounds per 1000 population in Crawley, which is comparatively high for an English town. However, the distribution for some of these sites across the borough is uneven, meaning residents in some locations have to travel further to access some types of open space. Furthermore, some of these spaces are increasingly coming under pressure from infill development.
- E22 In considering the layout, scale and arrangement of buildings, streets and landscapes, new Local Plan policy requires all new development to (a) make connected places that are permeable for people and wildlife, (b) connect new development to areas of rural open space and/or large urban areas of green open space and ensure new route alignments follow direct desire lines as much as possible allowing for through routes to be straight and direct, providing clear, legible and obvious linkages to adjoining areas. In addition, that (c) major applications must ensure the proposed urban structure results in movement paths and (d) that corridors are determined by where people want to go within and beyond the development. All of which should enable shorter, more direct active travel routes to new and existing open space. In addition, such policy should, by default, introduce and or facilitate the identification and eventual delivery of a myriad of new landscaped open space corridors within and between existing neighbourhoods.
- E23 Open 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. A GIS-based desktop study of the ecological networks and the services they offer the borough has been undertaken. These include: accessible nature; air purification; carbon storage; education; green travel; local climate; noise regulation; pollination; and water purification.
- E24 Through previous consultations, the residents of Crawley were 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. Therefore, it is vital to maintain and improve the quality of parks and gardens to preserve the quality of life for residents and visitors.
- E25 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

- E26 It is difficult to predict what the impact might be without the continued implementation of the Local Plan. The existing policies provide protection to these areas. In addition, in trying to meet housing requirements, the Local Plan allocated one of these sites as a Housing, Biodiversity and Heritage site. A further site was designated as a Local Green Space site, for its recreational, biodiversity, heritage and accessible countryside values. However, national guidance requires local policies to be set in an up-to-date Local Plan. Therefore, without the continuation of the Local Plan, through the Local Plan Review, 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.
- E27 Furthermore, national policy, planning and environmental policy, has evolved since the Local Plan was adopted. Government policies on Biodiversity Net Gain, Local Nature Recovery and greater awareness surrounding biodiversity through Pollination Plans e.g. National Pollinator Strategy for bees and other pollinators (2014) require their implementation into policies within the Local Plan to provide better protection for green and open spaces. In particular, greater weight is placed now on securing a ‘net gain’ in biodiversity, and ensuring this is secured through new development is becoming mandatory, as well as addressing the need to meet the needs of pollinator species. The current Local Plan policies have this as an aspirational aim but it is not explicit, and a clearer local policy framework will better meet the national expectations.

What the Local Plan can and cannot do

- E28 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. The designation of Local Wildlife Sites (previously known locally as Sites of Nature Conservation Importance) is done independently from the planning system, through a panel of sub-regional experts (and overseen by the Local Nature Partnership and Biodiversity Record Centre). Unfortunately, securing funding for the management and improvement of these areas has been largely outside the remit of the Local Plan, particularly where these sites fall outside of public ownership.
- E29 Through the introduction of a mandatory requirement to secure net gain, where on-site mitigation and compensation is insufficient to deliver the full net gain for biodiversity required for the site, then securing off-site financial contributions to council owned sites can be generated. This may begin to provide greater funding opportunities to be directed towards agreed improvements across the Green Infrastructure network.
- E30 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 Local Green Space designation was explored with residents through the adopted Local Plan and resulted in the Local Green Space at Ifield Brook Meadows and Rusper Road Playing Fields.
- E31 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. Small changes to structural landscapes

and soft landscape areas may need to be considered to enhance biodiversity protection in the town.

E32 Policy can aim to encourage interventions on smaller sites that lead to a net gain in biodiversity with considerable thought given at early stages of the design and layout of the development. Consideration for green roofs and green walls can be encouraged through the Local Plan and use of ecological reports with the Defra Biodiversity Metric.

E33 Furthermore, the Local Plan can highlight the value and benefit of Local Nature Partnerships with companies and NGOs that promote sustainable interventions and a prosperous natural capital resource.

Indicator No.	Indicator	Crawley Data	Data Sources
E1	Amount and type of development within areas designated for their nature importance	2020/21: 1 application for development close to sites designated for their nature importance. 2017/18: 5 applications for development close to sites designated for their nature importance. 2016/17: 5 applications for development close to sites designated for their nature importance. 2015/16: 4 applications for development close to sites designated for their nature importance.	Planning Register; CBC Authority Monitoring Report Sussex Biodiversity Record Centre
E2	Amount of trees with Tree Preservation Orders lost per annum	2021/22: approval was given for the removal of 44 TPO trees; conditions required 33 trees to be replaced; overall deficit of 11. 2017/18: approval was given for the removal of 39 TPO trees; conditions required 27 to be replaced; overall deficit of 12. 2016/17: approval was given for the removal of 59 TPO trees; conditions required 24 to be replaced; overall deficit of 35. 2015/16: approval was given for the removal of 73 TPO trees; conditions required 60 to be replaced; overall deficit of 13.	Planning Register; Crawley Authority's Monitoring Report
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.	Crawley Authority's Monitoring Report
E4	Number of trees and soft landscaping secured on site or through s106 contributions.	Not currently monitored. However, future data will serve as baseline.	Crawley Authority's Monitoring Report
E5	Hectares/percentage of land in Crawley identified as Local Wildlife Sites	329.79 ha (7.33%) in 2009 329.79 ha (7.33%) in 2018 327.19 ha (7.28%) in 2022	Sussex Biodiversity Record Centre
E6	Hectares/percentage of land in Crawley identified as Ancient Woodland	105.51 ha (2.35%) in 2009 197.68 ha (4.40%) in 2018 197.68 ha (4.40%) in 2022	Sussex Biodiversity Record Centre

Indicator No.	Indicator	Crawley Data	Data Sources
E7	Number of goals within a Management Plan met in a specified time period (five years).	Not currently monitored. However, future data will serve as baseline.	Crawley Authority's Monitoring Report
E8	Number of Management plans renewed in a five year cycle	Not currently monitored. However, future data will serve as baseline.	Crawley Authority's Monitoring Report

Issue: Development in the borough will impact on biodiversity, fauna, flora and soil

- E34 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.
- E35 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').
- E36 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 – Climate Change, Sustainability, Sustainable Design and Construction.
- E37 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

- E38 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

- E39 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	Data Sources
E9	Change in areas of biodiversity importance	<p>Total area of open space and natural habitats = 500 hectares (12.9%). No direct loss of sites designated for their biodiversity importance.</p> <p>One site has been allocated as a Key Housing: Housing, Biodiversity and Heritage site through the adopted Local Plan. A Development Brief is being prepared to ensure that whilst there will be a significant loss of the nature conservation value on half of the site, mitigation, enhancements to the remainder of the site, and compensation will seek to maintain an overall net gain in biodiversity.</p>	CBC Authority Monitoring Report
E10	Improved Local Biodiversity – proportion of Local Sites where positive conservation management has been or is being implemented - District (CBC)	CBC has 12 LWS sites and of these seven are actively managed by the borough council. The four other sites are privately owned and as such CBC have no control over the management of these sites.	CBC Authority Monitoring Report Sussex Biodiversity Record Centre

Topic Area F – Transport and Infrastructure

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

Introduction

- F1 Crawley’s position at the heart of the Gatwick Diamond economic area, and with more jobs than working age population in the borough, businesses typically draw their workforce from a wide area. Crawley’s excellent transport links are important to its role as an attractive business location. The borough benefits from excellent rail connectivity including the London-to-Brighton and London-to-Southampton rail links, and Three Bridges to Cambridge and Peterborough. The M23 motorway provides surface transport links to the borough from London and the South Coast, whilst Gatwick Airport provides both domestic and international flights, and in 2019 was used by over 46 million passengers. Hence, both the inter- and intra-transportation network is of particular importance to the borough. Crawley’s role within the Gatwick Diamond means that significant new growth is anticipated in and around the borough with around 5,000 new homes anticipated within Crawley during the Plan period and the possibility of significant urban extensions immediately outside Crawley’s boundary also being considered through adjoining authorities’ plans. New employment floorspace is also anticipated.
- F2 A thorough consideration of the strategic infrastructure network is to be 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

- F3 For the purposes of this SA/SEA Report, 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 (MHCLG, 2021)

Infrastructure

- National Planning Policy Framework (MHCLG, 2021)
- National Infrastructure Assessment (National Infrastructure Commission, 2018)
- White paper: Industrial Strategy (BEIS, 2017)
- Clean Growth Strategy (BEIS, 2017)
- Community Infrastructure Levy Regulations 2010 (as amended)
- Planning Act 2008
- Crawley Growth Deal (WSCC, 2016)
- Crawley Infrastructure Plan (CBC, 2023)
- Crawley Draft Infrastructure Plan (CBC, 2019)
- Crawley Infrastructure Delivery Schedule – December 2023 (CBC, 2023)
- Crawley Infrastructure Delivery Schedule – October 2023 (CBC, 2023)
- Crawley Borough Council CIL Charging Schedule 2016 (CBC, July 2016)
- Northern West Sussex Statement of Common Ground July 2023 (July 2023)
- Delivering schools to support housing growth (DfE, August 2023)
- Thames river basin district river basin management plan (DEFRA, 2018)
- South East river basin district river basin management plan (DEFRA, 2018)
- Water Resources Management Plan 2019 (Southern Water, 2018)

- Water Resources Management Plan 2019 (Thames Water, 2018)
- Water Resources Management Plan 2019 (South East Water, 2018)
- Water Resources Management Plan 2019 (Sutton and East Surrey Water, 2018)
- Draft Water Resources Management Plan 2024 (Southern Water, 2022)
- Futureproofing our water supplies: a consultation on our Draft Regional Plan for South East England (Water Resources South East, 2022)
- Gatwick Sub-Region Water Cycle Study (2020) and Addendum (2021), JBA

Transport

- National Planning Policy Framework (MHCLG, 2019)
- Economic Connectivity Review (Transport for the South East, 2018)
- Inclusive Transport Strategy (DfT, 2018)
- Cycling and Walking Investment Strategy (DfT, 2017)
- Gear Change, A bold vision for cycling and walking (DfT, 2020)
- Bus Back Better: National Bus Strategy for England (DfT, 2021)
- National Bus Strategy: Bus service improvement Plans (BISIP). DfT 2021.
- Department for Transport Circular 01/2022: Strategic Road Network and the Delivery of Sustainable Development (December 2022)
- Sustainable Travel Towns Evaluation summary report (DfT, 2010)
- Building Regulations Approved Document S (DLUHC, 2021)
- Urban Design Compendium, (Updated HCA 2013, originally by English Partnerships 2000)
- Living with beauty: report of the Building Better, Building Beautiful Commission (MHCLG 2020)
- National Design Guide (MHCLG October 2019)
- A Strategic Vision for Rail (DfT, 2017)
- The Road to Zero: Next steps towards cleaner road transport and delivering our Industrial Strategy (DfT, 2018)
- Transport Infrastructure Efficiency Strategy (DfT, 2017)
- West Sussex Walking and Cycling Strategy 2016-2026 (West Sussex County Council, 2017)
- West Sussex Transport Plan 2022-36 (West Sussex County Council, 2022)
- Crawley Transport Modelling Study (Stantec, 2022)
- Crawley Transport Modelling Study TN01 Comparison of Trip Ends in NTEM June 2023 (Stantec, August 2023)
- Crawley Transport Modelling Study TN02 GAL Sensitivity Test June 2023 (Stantec, August 2023)
- Crawley Transport Modelling Study TN03 Gatwick Green Trip Generation Comparison June 2023 (Stantec, August 2023)
- Horsham and Crawley Joint Assumptions Transport Note (Stantec, June 2021)
- Crawley Borough Council and National Highways Statement of Common Ground (December 2023)
- Crawley Borough Council and National Highways Statement of Common Ground (July 2023)
- Crawley Borough Council and West Sussex County Council Statement of Common Ground (August 2023)
- Crawley Borough Council and West Sussex County Council Statement of Common Ground (December 2023)
- Northern West Sussex Statement of Common Ground July 2023 (July 2023)
- Crawley Western Link Road – Northern Section Study (Systra, 2023)
- Transport Modelling Part 1 (Amey Consulting, 2012)
- Transport modelling Part 2 (Amey Consulting, 2014)
- Local Transport White Paper: Creating Growth, Cutting Carbon (DfT, 2011)
- Crawley Local Cycling and Walking Infrastructure Plan (CBC, 2021 – amended 2023)
- ‘New Directions for Crawley’: Crawley Transport Strategy (CBC, 2021)

- Crawley Infrastructure Plan July 2023 (CBC, 2023)
- Crawley Infrastructure Delivery Schedule – December 2023 (CBC, 2023)
- Crawley Infrastructure Delivery Schedule – October 2023 (CBC, 2023)
- Department for Transport Circular 01/2022 Consistency Checklist, October 2023 (CBC, 2023)
- National Model Design Code (MHCLG 2021)
- Crawley Growth Programme
- Rail Utilisation Strategies – London and the South East (Network Rail, 2011)
- West Sussex Local Transport Plan (LTP3) 2011 – 2026 (WSCC, 2011)
- National Travel Survey 2017
- Transport Strategy for the South East (TfSE, 2020)
- A Strategic Investment Plan for the South East (TfSE, 2023)
- Mapping the Region’s Transport Challenges (SEERA, 2009)
- The Department for Transport’s Draft Guidance to Regions on Delivering a Sustainable Transport System (DaSTS, 2008)

Gatwick

- Aviation Policy Framework (DfT, March 2013)
- Aviation 2050; The Future of UK Aviation Consultation (DfT, December 2018)
- Beyond the Horizon: The Future of UK Aviation – making best use of existing runways, DfT, June 2018
- Airports National Policy Statement: New runway capacity and infrastructure at airports in the South East of England, DfT, June 2018
- Flightpath to the Future, DfT, May 2022
- Jet Zero: Modelling Framework, DfT March 2022
- Jet Zero Strategy: Delivering net zero aviation by 2050, DfT, July 2022
- The Second National Infrastructure Commission Baseline Report, November 2021
- May 2022 Legal Agreement between CBC, WSCC and the airport operator
- Gatwick Airport Master Plan (Gatwick Airport Limited, July 2019)
- Gatwick Airport’s Submission to the Airports Commission – the Operational Efficiency Masterplan Appendix A5-A6, (Gatwick Airport Limited, May 2014)
- Airports Commission Final report (Airports Commission July 2015)
- Gatwick Airport Surface Access Strategy (Gatwick Airport Limited, October 2022)
- Gatwick Airport Interim Parking Strategy (Gatwick Airport Limited, February 2017)
- Control of Development in Airport Public Safety Zones (DfT 2021)
- Safely Landed? Is the current aerodrome safeguarding process fit for purpose? (Lichfields, 2018)

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

- F4 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.
- F5 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;
 - Junction 9 of the M23
 - A23 London Road/M23 ‘Spur’ Corridor

- Most of the A2220 Horsham Road & Corridor, in particular:
 - Broadfield Roundabout
 - Gossops Drive/Buckswood Drive
- Most of the A23 Crawley Avenue Junctions/Corridor, in particular:
 - A2011 Crawley Avenue/B2036 Balcombe Road
 - Ifield Roundabout/Ifield Avenue/A23 Crawley Avenue
 - Cheals Roundabout/A2220 Horsham Road/Crawley Avenue
 - Tushmore Gyratory/A23 London Road/A23 Crawley Avenue
- Most of B2036 Balcombe Road junctions, in particular, within Crawley:
 - B2036 Balcombe Road/Radford Road
 - B2036 Balcombe Road/Steers Lane
- Most of the Southgate Avenue Corridor junctions, in particular:
 - Southgate Avenue/Ashdown Drive

F6 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 updated 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. The Highways Authority also identified that improvements will be required at:

- A2011 Crawley Avenue/A2004 Northgate Avenue/ Hazelwick Avenue;
- A23 London Road/Manor Royal
- A2011 Crawley Avenue/B2036 Balcombe Road.

F7 In addition, the Crawley Local Plan Transport Modelling (Stage 1 and 2) confirmed that the development proposals within the 2015 Local Plan would not severely affect the transport network within Crawley. An updated Transport Assessment has been undertaken in order to assess this in relation to the updated Local Plan, [and additional sensitivity tests were undertaken in 2023 \(TN01-TN03\) to establish that this remains a reasonable worse case scenario, bearing in mind updates to the end point of the plan, background levels of growth at Gatwick Airport, and the needs of the Gatwick Green Strategic Employment Location. The updated Transport Assessment identified a number of additional highways/strategic road network mitigations that would be required to support projected levels of growth.](#) With further development planned through the Local Plan to 2040, significant growth at Gatwick Airport, and major development being promoted to the west of Crawley, it is also possible that a new Western Multi-Modal Link Corridor may be required.

F8 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.

F9 All four stations have seen an increase in passenger usage over the past three years and Gatwick Airport Station was the 22nd busiest station in the UK in 2019 in terms of passenger usage. A major improvement project is under construction. The new Thameslink services from Peterborough and Cambridge to Three Bridges and Brighton are increasing pressure on the Brighton Mainline through Crawley.

- F10 In addition, the developers of Kilnwood Vale to the west of Crawley have been in discussions with Network Rail, WSCC, GTR and DfT, 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. The outcome of these discussions is not yet conclusive. 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.
- F11 There is a well-established and growing bus passenger market in Crawley, with the highest national bus usage outside London. 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 and various new routes have been added since.
- F12 The patronage of Fastway, which operates three routes, has grown steadily since it opened. 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.
- F13 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.
- F14 Through Crawley Growth Programme, further sustainable transport infrastructure and highway upgrades are planned to boost overall transport capacity and enable a significant shift from car usage to bus, rail, cycling and walking alternatives. Connectivity enhancements at the major railway stations of Crawley, Three Bridges and Gatwick Airport will greatly facilitate commuter access to Manor Royal and the Town Centre via sustainable transport connections.

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
F1	Access to services and facilities by public transport, walking and cycling: The proportion of housing delivered on major developments which achieves the appropriate minimum densities set out in Policy CL4.	2010 Accession mapping indicates Crawley has good access to services via public transport. Not currently monitored. However, future data will serve as baseline.			Former NI 175 CBC Authority Monitoring Report
F2	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 –	Data for Crawley indicates a higher proportion of sustainable travel than in 2010. Fewer pupils are cycling to school, but proportions of walking, bus and car-share journeys are higher.	Former NI 198 West Sussex County Council Jan 2011 School Census

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%	2.3% Walking – 53.8% Cycling – 1.7% 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%		More up to date information being sourced.
F3	Proportion of adults who do any walking or cycling, for any purpose	2021 data: At least once a month: 74.6 per cent At least once a week: 66.6 per cent At least 3 times per week: 39.3 per cent At least 5 times per week: 30.2 per cent	2021 data: At least once a month: 81.6 per cent At least once a week: 74.7 per cent At least 3 times per week: 48.6 per cent At least 5 times per week: 35.7 per cent	The proportion of adults walking and cycling has declined in Crawley since 2016. Across the wider south east it has been broadly stable.	CW0301: Proportion of adults who do any walking or cycling, for any purpose, by frequency and local authority: England (DfT, 2022)
F4	Change in number of publicly available Electric Vehicle Charging Points within the borough.	52 devices as of 14/12/2022			CBC Authority Monitoring Report
F5	Per capita greenhouse gas emissions from transport (also see Objective 1);	2020: 1.8 tonnes	2020 South East: 1.69 tonnes	2020 figures show a decrease which may be related to the impact of the covid-19 lockdowns. Previously transport emissions have remained fairly stable over time as other areas have reduced.	Local Authority territorial greenhouse gas emissions estimates 2005-2020, BEIS, 2022

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

F15 Prior to the Covid-19 pandemic, Gatwick Airport saw an annual throughput of over 46 million passengers. It is estimated that within its current configuration it could cater for up to 61mppa by 2032. The Gatwick Airport Masterplan 2019 also includes proposals to use the existing standby runway which would increase capacity to over 75mppa by 2038. It states that this would be a Nationally Significant Infrastructure Project that would be considered by the Planning Inspectorate through the Development Consent Order process.

- F16 The growth of the airport generates pressures on existing and planned infrastructure such as transport links, as well as the demand for power and water and waste disposal; and has environmental impacts on air quality, noise and water quality and climate change implications. The latest Section 106 agreement signed in 2022 by Gatwick Airport Limited, CBC and WSCC contains obligations which seek to mitigate the environmental effect of growth at the airport through a range of activities and requirements.
- F17 The Aviation Policy Framework (March 2013) outlines that land outside existing airports that may be required for airport development in the future needs to be protected against incompatible development until the government has established any relevant policies and proposals in response to the findings of the Airport Commission. As the draft Aviation Strategy published in December 2018, after the Airports National Policy Statement supporting Heathrow was published, states that it would be prudent to continue safeguarding at other airports, the council is continuing to safeguard land south of the airport for a potential future runway. Any expansion of the airport would also be a Nationally Significant Infrastructure Project and the council will seek to ensure, through the Development Consent Order process, that any necessary supporting infrastructure is provided. Such a proposal would be accompanied by its own Environmental Impact Assessment.
- F18 The Gatwick Airport S106 Agreement sets the obligation that 48% of non-transfer passengers should be using public transport to access the airport by 2024, up from the 2015 figure of 40% (stretch target to 45%). A target of 42% of staff journeys by sustainable modes has also been set. The latest Gatwick Airport Surface Access Strategy modal share information indicates that the Airport currently sustains a rail mode share for passengers of 43%. The most recent ASAS, October 2022, includes a more ambitious target of 52% of passenger journeys being made by public transport.
- F19 The airport operator is required, through the S106 legal agreement, to prepare an Airport Surface Access Strategy to address and appropriately manage the surface access need of aircraft passengers and staff. Despite the success in meeting its public transport mode share targets, achieving the 48% target still requires the provision of significant parking facilities on-airport for those who chose to drive to the airport by private car. Sites within the airport boundary provide the most sustainable location for any additional long stay parking which needs to be provided as passenger throughput grows, in the context of the overall sustainable transport policy. Sites within the airport boundary are close to the terminals and can help reduce the number and length of trips.
- F20 The expansion of the airport on the single runway, 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. Growth of the airport through the use of the northern runway is separately being considered through the DCO process.

Likely evolution without the continued implementation of the Local Plan

- F21 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. The Local Plan Review also sets out the challenge of development beyond Crawley's boundaries and the expectation that it should address the impact it will have on Crawley's infrastructure.
- F22 The updated Local Plan will provide a local policy context for the development of Gatwick, balanced against development and infrastructure needs, and helps ensure that development at the airport is airport-related and its environmental impact is managed, and economic benefits

are maximised for the local area. The Local Plan policies are vital in ensuring that the airport is able to meet its sustainable transport obligations set out in the S106 legal agreement. Without the Local Plan control of the transport and parking impacts of the growth of the airport, the management of its environmental impact would be more limited.

What the Local Plan can and cannot do

- F23 A priority for the Local Plan Review is to create a safe and efficient transport network that can sustainably support the town’s continued growth. Policies in the updated Local Plan will limit development that adversely impacts upon the network unless appropriate mitigation is provided and will seek the provision of appropriate infrastructure to support new development.
- F24 The Local Plan cannot secure funding for the delivery of major, strategic infrastructure which is required to serve cumulative developments some of which may be beyond the borough’s boundary.

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
F6	Number of passengers using Gatwick Airport per annum (and percentage arriving by public transport)	2016: 38.94m (43.5%) 2017: 41.21m (43.7%) 2018: 41.57m (43.8%) 2019: 40.84m (47.4%) 2020: N/A (Covid-19) 2021 (Q2/Q3 due to Covid-19): 6.24m (42.4%)		Passenger numbers on the single runway are predicted to increase to 61 million passengers per annum by 2032. The percentage of international air passengers at Gatwick has grown faster than that for domestic passengers. SAAP 2022 now includes target for 52% public transport access.	CBC GAL ASAS 2022

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

- F25 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. Where major strategic development is situated in other Local Authority areas, but is located adjacent to Crawley’s boundary, this places further pressures on the infrastructure that supports Crawley.

Likely evolution without the continued implementation of the Local Plan

- F26 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 Developer Contributions Guidance Note (2021), it would not be able to provide for specific items of infrastructure needed in certain locations.

What the Local Plan can and cannot do

- F27 Through monitoring and specific policies, the Local Plan Review 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 being implemented by the council.
- F28 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 Review 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.).
- F29 While promoting intensification of existing urban areas and minimum density ranges for new residential development, (i.e. new policy states that new development must identify, test, determine and (where appropriate) embrace opportunities for increased density), such ambitions are complemented by additional safeguarding policy to ensure existing neighbourhoods avoid the associated problems such intensification can cause. This includes, in particular, problems associated by increased private vehicle use including congestion and parking blight. As such compact development is only supported in particular places which are within a short walking distance of a dependable, frequent and high capacity public transport service to provide people with a realistic and attractive, all-weather alternative to using private vehicles to access the places they need across medium distances. For shorter distances, improvements to active travel infrastructure is also essential.
- F30 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	Data Sources
F7	Rate of residential and commercial development to be in accordance with Local Plan annualised requirements and local commercial requirements.	<ul style="list-style-type: none"> - Rate of residential growth stands at 141% of annualised projections for 2015-22 as of April 2022 - Rate of commercial growth stands at 76% of annualised projections for 2015-21 as of April 2021 	CBC Authority Monitoring Report
F8	Provision of identified priority infrastructure schemes (monitored through the Community Infrastructure Levy and Infrastructure Plan).	Not currently monitored. However, future data will serve as baseline. The monitoring of this will support and reflect the work of the Transport Infrastructure Management Group which is proposed to be established by CBC to monitor implementation of the Local Plan transport strategy, and which will include West Sussex County Council and National Highways.	CBC Authority Monitoring Report

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 118,500. 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 New Town in the during its initial phase of expansion in the 1950s and 60s 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.
- G2 Inevitably the different people living in the town have different issues regarding their social, health and environmental wellbeing. Therefore, it is 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

- G3 For the purposes of this SA/SEA Report, 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 (MHCLG, 2021)
- Reuniting Health with Planning – Healthier Homes, Healthier Communities (TCPA, 2012)
- Gatwick Diamond Local Strategic Statement (Chilmark Consulting, 2017)
- Infrastructure Plan (CBC, 2023)

Health:

- Start Well, Live Well, Age Well: West Sussex Joint Health and Wellbeing Strategy 2019 – 2024 (WSCC, 2019)
- West Sussex Joint Strategic Needs Assessment “People and Places” for Crawley (WSCC, 2019)
- Improving Lives Together: Our ambition for a healthier future in Sussex (2022) Sussex Health and Care
- Crawley Open Space, Sport and Recreation Assessment (2020) The Environment Partnership
- Crawley Playing Pitch Strategy (2020) 4Global Consulting
- Noise Annex: Local Plan (CBC, 2015)

Education

- Planning School Places 2022 (WSCC, 2022)

Crime and Fear of Crime

- National Community Safety Plan 2008-2011
- Annual Strategic Assessment 2017/18 (Safer Crawley Partnership, 2018)

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

- G4 The Census 2021 estimated the population of Crawley as 118,500. Population growth 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 whilst providing more assisted living and appropriate 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.
- G5 The 2021 Census indicates that 21% of the resident population is under 15 years of age (compared to 17.4% for England and Wales), 66% is between 15 and 64 (compared to 64% in England and Wales) and 13% is aged 65 and over (compared to 18.6% 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.
- G6 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. This is an area where further clarification is being sought as part of the Local Plan Review.

Likely evolution without the continued implementation of the Local Plan

- G7 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. Whilst essential infrastructure can be delivered without the Local Plan, understanding projections and likely population is more complex without the certainty provided by allocation and anticipated growth and capacity figures established in the Local Plan.

What the Local Plan can and cannot do

- G8 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.

Indicat or No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
G1	Rates of overcrowding and under occupancy	2021 Overcrowding 6.8% Under occupancy 59.3%	2021 SE Overcrowding 3.4% Under occupancy 70.5% England Overcrowding 4.3% Under occupancy	Overcrowding in Crawley has increased from 5.45% in 2011 while under occupancy has fallen from 63.62%. Overcrowding in the South East has fallen from 3.58% in 2011 while under occupancy has only slightly fallen from 70.72%. Overcrowding in England has fallen from 4.64% in 2011 while	2021 Census 2011 Census.

Indicat or No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
			68.8%	under occupancy has risen very slightly from 68.68%. Relative to the national and regional picture under occupation in Crawley is lower and falling more quickly, while overcrowding is (contrary to the national and regional trends) increasing.	
G2	Barriers to housing and services domain of deprivation – rank of average rank	2019 Crawley is ranked 38 out of 317 (where 1 is most deprived)	NA	In 2015 Crawley was ranked 39 out of 326 (where 1 is most deprived) Relative incidence of barriers to housing and services remains high in Crawley, with the borough being within the 20% most deprived Local Authorities in England for this domain.	English Indices of Multiple Deprivation 2019 English Indices of Multiple Deprivation 2015
G3	Living environment domain of deprivation – rank of average rank	2019 Crawley is 207 out of 317 (where 1 is most deprived)	NA	In 2015 Crawley was ranked 318 out of 326 (where 1 is most deprived) Relative incidence of a deprived living environment has increased in Crawley since 2015, although this type of deprivation remains below the national average.	English Indices of Multiple Deprivation 2019 English Indices of Multiple Deprivation 2015.

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

G9 Crawley (Census, 2021) 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 6.2% of the population of the borough; and Pakistani who represent 5.2%. This is in comparison with 3.1% and 2.7% 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

G10 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

G11 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 the population identifying themselves with one or more non-UK national identities	2021 17.7%	2021 South East 10.9% England and Wales 11.7%	2011 Crawley 13.1% South East 8% England and Wales 9% The proportion of people identifying themselves with at least 1 non-UK national identity is larger and growing more quickly than is the case at the regional level and across England and Wales as a whole	Census 2021 Census 2011
G5	Religious identities expressed by at least 1% of the population	No religion 35.1% Christian 42.6% Hindu 5.1% Muslim 9.7%	West Sussex County – 61.7% South East No religion 40.2% Christian 46.5% Hindu 1.7% Muslim 3.3% England and Wales No religion 37.2% Christian 46.2% Hindu 1.7% Muslim 6.5%	2011 Crawley No religion 26.1% Christian 54.2% Hindu 4.5% Muslim 7.2% South East No religion 27.66% Christian 59.76% Hindu 1.07% Muslim 2.34% England and Wales No religion 25.14% Christian 59.28% Hindu 1.46% Muslim 4.83% A relatively high proportion of Crawley residents identify with the Muslim and Hindu faiths and both groups are growing more rapidly as a proportion of the population than in the South East or England and Wales more widely. As elsewhere Christians are the largest religious grouping while a large minority of people identify themselves as non-religious.	Census 2021 Census 2011

Issue: Crawley has a high proportion of young children, particularly under 4's, compared with other West Sussex districts but there are deficiencies with regard to early years provision in the borough. Those leaving education are not able to participate fully in the local economy.

G12 There are areas of deficiency in 'early years' provision for under 5s in Crawley, owing to localised imbalance between demand and the number of places available.

- G13 There are 25 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, Thomas Bennett Community College, providing education to children aged between 11 and 16 and to A- Level standard for 16-18 year olds. In addition, the Gatwick School is a through-school offering primary and secondary education. The Central Sussex College has a large campus in the town centre and offers a wide range of professional qualifications and courses.
- G14 Educational attainment within the borough tends to be lower when compared to the South East averages. In 2021/22 38.9% of pupils living in Crawley achieved grades 5 or above in English and Maths GCSEs. This compares with 51.8% in the South East region as a whole. 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

- G15 The provision of early years and educational facilities is the responsibility of county council and is identified in our Infrastructure Plan where relevant. Further education is provided in the town by Crawley College, this is part of Chichester College Group.

What the Local Plan can and cannot do

- G16 The council has an adopted Community Infrastructure Levy Charging Schedule through which contributions 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. The Local Plan supports the council's initiatives to improve skills of the Crawley residents.

Indicator No.	Indicator	Crawley Data	South East	England	Data Sources
G6	Proportion of pupils not in a sustained education, apprenticeship or employment destination during the year after completing Key Stage 4	4.3% not entering a sustained education, apprenticeship or employment destination after completing Key Stage 4 in 2020/21.	4.1%	4.8%	'Key stage 4 local authority level destinations' from 'Key stage 4 destination measures' (DfE)
G7	Percentage of people aged 16 – 64 with no qualifications.	2021: # 2020: # 2019: # 2018: # 2017: # 2016: # 2015: # 2014: 4.6% 2013: 9.2% 2012: 11.6% #too small to estimate reliably	2021: 5.0% 2020: 4.8% 2019: 5.8% 2018: 5.6% 2017: 5.2% 2016: 5.5% 2015: 6.3% 2014: 5.6% 2013: 6.4% 2012: 6.9%	2021: 6.4% 2020: 6.2% 2019: 7.5% 2018: 7.6% 2017: 7.6% 2016: 7.8% 2015: 8.4% 2014: 8.6% 2013: 9.2% 2012: 9.5%	Annual Population Survey, ONS, via NOMIS

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

G17 Total recorded crime in the borough increased by 40.2% between 2014 and 2020, although this varied between crime types with a reduction in domestic burglary (29.6%), compared with a marked increase in public place violent crime of 91.3%.

Table G1: Crawley Crime incidence 2014-2020

Crawley and Gatwick	14/15	15/16	16/17	17/18	18/19	19/20	Actual difference	% change
Total Crime	9,167	9,443	10,658	11,681	12,520	12,856	3,689	+40.2%
Domestic Burglary	615	468	493	569	531	433	-182	-29.6%
Vehicle Crime*	590	520	596	667	828	752	162	+27.5
Criminal Damage	1,010	1,032	1,198	1,163	1,120	1,129	119	+11.8%
Public Place Violent Crime	1,719	1,945	2,426	2,711	3,058	3,288	1,569	+91.3%
Business Crime	1,952	1,939	2,054	2,219	2,036	2,093	141	+7.2%

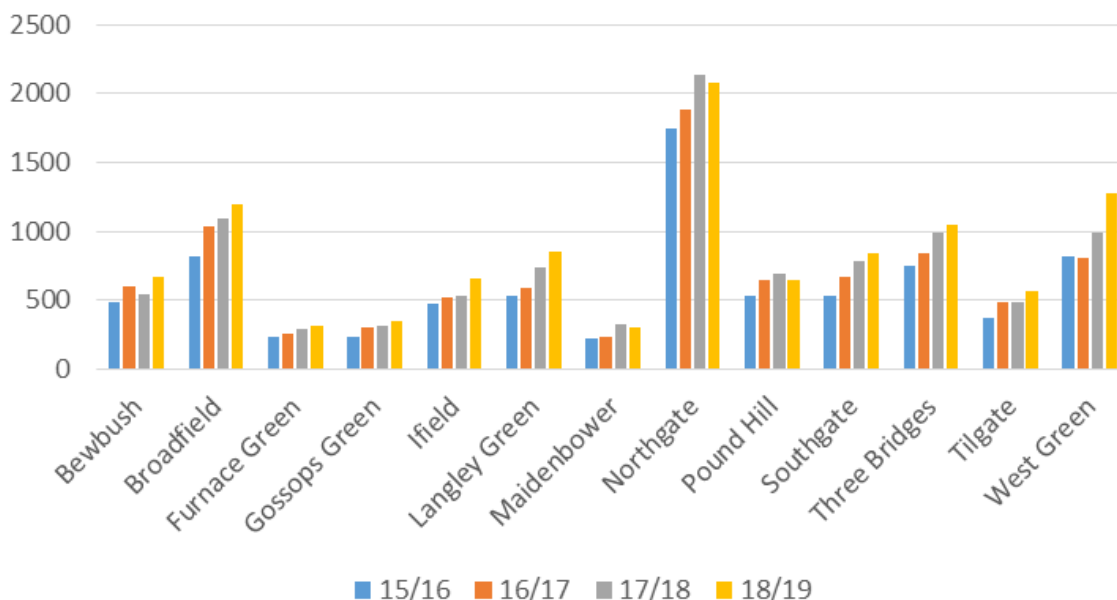
* Vehicle crime includes theft of motor vehicle and theft from a motor vehicle

Source: Sussex Police – Community Safety Partnership – by crime type (monthly report). All data taken from the published March report. Not all crime types included.

G18 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.

G19 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, no doubt heightened by the increase in public place violent crime.

Figure G2: Crime by Neighbourhood 2015 - 2019



G20 Crime has increased in each neighbourhood, with the exception of Pound Hill and Maidenbower which experienced a slight drop from 17/18 to 18/19. Northgate experiences by far the highest number of crimes but this is because it 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 give a false impression of the volume of crime in Northgate ward.

Likely evolution without the continued implementation of the Local Plan

G21 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

G22 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	Total Recorded Crime.	14/15 – 9,167 15/16 – 9,443 16/17 – 10,658 17/18 – 11,681 18/19 – 12,520 19/20 – 12,856		2014/2015 – 2019/2020: Actual difference – 3,689 Percentage change - +40.2%	Sussex Police
G9	Rate of public place violence offences.	14/15 – 1,719 15/16 – 1,945 16/17 – 2,426 17/18 – 2,711 18/19 – 3,058 19/20 – 3,288		2014/2015 – 2019/2020: Actual difference – 1,569 Percentage change - +91.3%	Sussex Police

Issue: Ensuring better health and healthcare for Crawley

G23 The health of town is generally good. For example, life expectancy at birth in Crawley is on average 79 years for men and 84 years for women, which is slightly higher than the national average (2021 data). Whilst 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.

G24 Open space, sport and recreation provision in the town is shown through Crawley's Open Space, Sport and Recreation Study (2020) to be of generally good quality and quantity. The Indoor Sports Facilities Study (2020) provides a detailed assessment of the borough's indoor facilities, and the Playing Pitch Strategy (2020) audits the need and provision of outdoor pitches for formal sports access. The borough's indoor sports facilities include K2 Crawley Leisure Centre which offers a broad range of facilities including an Olympic sized swimming pool and climbing wall.

G25 Physical activity levels for the area are generally lower than the national picture although satisfaction with leisure facilities is very high. However, there are 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.

G26 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

G27 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

G28 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.

G29 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
G10	Self-reported measure of people's overall health and wellbeing	84.1% in good health or better	England Average – 82.2 South East - 84% WSSC – 83.1%	Crawley has a higher self-reported measure of people's overall health than England's average.	Census 2021 Census 2011
G11	Under 75 mortality rate from all causes	2021 340.3 per 100,000	England: 2021 363.4 South East 320.2	Crawley has a higher under 75 death rate than the average for the South East while remaining lower than the average for England	Local Authority Health Profiles
G12	Hip fractures in people aged 65 and over	2021/22 693 per 100,000	South East 2021/22 536 per 100,000 England 551 per 100,000	The rate of hip fractures among the over-65s is higher in Crawley than in the South East or England as a whole.	Local Authority Health Profiles
G13	Proportion of adults who are physically active for at least 150 minutes a week	November 2020/21 58%	November 2020/21 South East 64% England 61%	The proportion of adults who are physically active for at least 150 minutes per week is lower in Crawley than in the South East and England as a whole.	Active People Survey by Sport England November 2020/21
G14	Number of Adults Physically Inactive (i.e. less than 30 minutes exercise per week)	November 2020/21 32.3%	November 2020/21 South East 24% England 27%	The proportion of adults who are physically inactive is higher in Crawley than in the South East and England as a whole.	Active People Survey by Sport England November 2020/21

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
G15	Percentage of Year 6 children identified to be obese.	2021/22 – 22.4%	2021/22 South East 20% England 23.4%	Levels of obesity at year 6 are higher in Crawley than in the South East as a whole, but lower than the national average.	Local Authority Health Profiles
G16	Adults who attended an arts event OR museum or gallery OR spent time doing an arts activity within previous 12 months	2015-17 67%	2015-17 South East 74% England 70%	Levels of engagement with arts and culture are lower in Crawley than in the South East or England as a whole	Active Lives Survey 2015-17

**APPENDIX G: SUBMISSION LOCAL PLAN SPATIAL STRATEGY
OPTIONS AND APPRAISAL**

SUBMISSION LOCAL PLAN SPATIAL STRATEGY OPTIONS AND APPRAISAL

The Local Plan Review process included considering the following high level options for undertaking the Update to the borough's Local Plan:

- Option 1: Preparing a Joint Plan with one or more neighbouring authorities;
- Option 2: Partial Review of specific policies and 'Saving' some existing policies;
- Option 3: Comprehensive Review of the adopted Local Plan, maintaining overall strategic approach, continuing Duty to Cooperate discussions, and taking a policy-by-policy approach to the degree of amendment or retention of individual policies. Considering new policies to be introduced through the plan-making process;
- Option 4: as with Option 3, but including a restructure of the Plan sections and chapters;
- Option 5: Starting from a blank page and creating a new strategic spatial strategy and a completely new full set of policies; and
- Option 6: Do not update the Local Plan and publish the review confirming the Plan is in conformity with national policy.

The Local Plan Review Options Appraisal is set out in the table below.

Local Plan Review			
Plan Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	Option 4: Comprehensive Review, retaining overall strategic approach, continuing Duty to Cooperate discussions; restructuring to reflect local priorities, updating evidence-base where identified as needed, taking a policy-by-policy approach to degree of amendment and/or retention; and considering new policies to introduce.		
Option 1: Preparing a Joint Plan with one or more neighbouring authorities.	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 and encourage active lifestyles	+ + +? + + +? + + +	
	Commentary Joint working is now a known priority. The Horsham District Planning Framework (HDPF) Inspector's Final Report ²³ commits Horsham District Council (HDC) to working with Crawley Borough Council and Mid Sussex District Council (MSDC) to, at least, meet the needs of the housing market area within the housing market area, as part of its early review. Joint working is also established in the adopted Mid Sussex District Plan (MSDP) ²⁴ and as part of their commitment to commence work on a Site Allocations Development Plan Document. Two Strategic Statements are relevant to Crawley borough:		

²³ Report on the Examination into Horsham District Planning Framework (8 October 2015) Geoff Salter, The Planning Inspectorate

²⁴ Mid Sussex District Plan 2014 – 2031, Policies DP4: Housing and DP5: Planning to Meet Future Housing Need (March 2018) MSDC

- The Gatwick Diamond Local Strategic Statement has recently undergone a refresh²⁵.
- The West Sussex and Greater Brighton Local Strategic Statement; this was updated in January 2016. Crawley Borough Council joined the Strategic Planning Board in April 2017 with observer status, and formally joined as a full member in January 2018.

Options assessed beyond these included the potential for: a non-statutory, overarching strategic statement; Joint Area Action Plans; or a Statutory Strategic Development Plan Document.

A Joint Plan, particularly covering the Housing Market Area, was assessed as part of the initial stages of commencing the Local Plan Review, as part of ongoing joint working with the adjoining authorities, particularly those within the Northern West Sussex Housing Market Area (Mid Sussex and Horsham districts); West Sussex county; and/or the Gatwick Diamond. However, due to the timing of the other authorities' Local Plans (particularly Mid Sussex who are committed to producing a subordinate document to the recently adopted District Plan), the practicalities of aligning the three Local Plans would not have met Crawley's timetable and priorities. In light of the government's introduction of the requirement for five year reviews to Local Plans, preparing a strategic joint local plan would be at the expense of a timely, comprehensive Local Plan, increasing the risk of the borough's local character policies being challenged as out-of-date.

The outcomes of the final adopted Local Plans for the three main authorities in the Housing Market Area have demonstrated effective cooperation, meeting the combined housing needs across the HMA (with monitoring). On this basis, there is nothing to indicate this positive Duty to Cooperate working cannot continue to be successful in the subsequent reviews of the Local Plans.

The potential for a future Joint Plan may be explored further in the form of a Joint Area Action Plan for sites immediately adjacent to Crawley. The inclusion of this commitment to continue joint working is established in the draft Crawley Local Plan Policies (Policy H1).

Many of the key evidence documents have been undertaken on a strategic scale, commissioned jointly with the other two authorities which form the northern West Sussex Housing Market Area and with the county council, in relation to housing and employment needs, as well as infrastructure and environment constraints. These will support joint approaches and agreed policies should urban extensions be explored through neighbouring Local Plans and to assist in unlocking additional strategic development opportunities in the wider Housing Market Area as a whole.

At a minimum, Statements of Common Ground will need to be secured with the relevant authorities on all strategic, cross boundary matters.

<p>Option 2: Retaining Existing Spatial Strategy and undertaking Partial Review of specific policies and 'Saving' some existing policies.</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 and 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>Commentary</p> <p>The initial 'review' of the Plan (set out in the Local Development Scheme 2017), highlighted the need to reconsider the Housing Need, Housing Sites, Affordable Housing, Economic Growth (EC1 – EC3) and Gatwick Airport (GAT1 – GAT4) policies.</p>			

²⁵ Gatwick Diamond Local Strategic Statement 2016 (2017) Chilmark Consulting Ltd, on behalf of Crawley Borough, Horsham District, Mid Sussex District, Mole Valley District, Reigate and Banstead Borough, Surrey County, Tandridge District and West Sussex County Councils: <https://crawley.gov.uk/planning/planning-policy/planning-policy-evidence/gatwick-diamond-local-strategic-statement>

	<p>This would have left the design/character, infrastructure, and environmental policies to be 'saved'.</p> <p>These 'saved' policies would not have been formally scrutinised through further consultation or examination, and where changes had knock-on effects to these policies, they may have become increasingly at risk of challenge for being out-of-date, particularly following the "five year" review point. As these policies provide much of the 'Crawley specific' details that are not explicitly covered in NPPF policies, this could result in negative impacts on built and landscape character, climate change, the natural environment, and infrastructure.</p>		
<p>Option 3: Comprehensive Review of the adopted Local Plan, maintaining overall strategic approach, including continuing Duty to Cooperate discussions, updating evidence-base where identified as needed, taking a policy-by-policy approach to degree of amendment and/or retention of individual policies; and considering new policies to introduce.</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 and 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>	
	<p>Commentary</p> <p>The current Local Plan is up-to-date, having recently been updated less than 5 years ago. Continual monitoring has shown it is a successful Plan and the initial assessment confirmed there was no urgent need to review the Local Plan. The outcomes at appeals have shown the policies in the Local Plan in the main provide a balanced and sound approach to planning in the borough.</p> <p>Updating the whole Local Plan would allow the greatest degree of accountability for the Local Plan and ensure it remains robust and up-to-date beyond the five year adoption date of the existing Local Plan (Crawley 2030). It allows for the baseline evidence to be updated where necessary, new policies to be considered, and existing policies to be reassessed and aligned in light of updated national and local positions, and for some to be retained where they continue to be appropriate.</p> <p>The outcomes of the final adopted Local Plans for the three main authorities in the Housing Market Area have demonstrated effective cooperation, meeting the combined housing needs across the HMA (with monitoring). On this basis, there is nothing to indicate this positive Duty to Cooperate working cannot continue to be successful in the subsequent reviews of the Local Plans.</p> <p>The potential for a future Joint Plan may be explored further in the form of a Joint Area Action Plan for sites immediately adjacent to Crawley. The inclusion of this commitment to continue joint working is established in the draft Crawley Local Plan Policies (Policy H1).</p> <p>Many of the key evidence documents have been undertaken on a strategic scale, commissioned jointly with the other two authorities which form the northern West Sussex Housing Market Area (Horsham and Mid Sussex District Councils) and with the county council, in relation to housing and employment needs, as well as infrastructure and environment constraints. These will support joint approaches and agreed policies should urban extensions be explored through neighbouring Local Plans and to assist in unlocking additional strategic development opportunities in the wider Housing Market Area as a whole.</p> <p>At a minimum, Statements of Common Ground will need to be secured with the relevant authorities on all strategic, cross boundary matters.</p>		
<p>Option 4: Comprehensive Review of the adopted Local Plan, maintaining overall strategic approach, including continuing Duty to</p>	<ol style="list-style-type: none"> 1. minimise climate change 2. adapt to climate change 3. protect/enhance built environment 	<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>Cooperate discussions, restructuring to reflect local priorities, updating evidence-base where identified as needed, taking a policy-by-policy approach to degree of amendment and/or retention of individual policies; and considering new policies to introduce.</p>	<p>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 and encourage active lifestyles</p>	<p>++ ++ ++ ++ ++</p>	
<p>Commentary As with Option 3. The difference with this Option to Option 3 relates to the structure of the Plan document, which may not have implications for the Sustainability Appraisal. However, by updating the structure, the council's priorities can be seen more clearly. Furthermore, this has allowed for synergies between policies to be better aligned and the overarching policies (i.e. beyond SD1): SD2 and SD3, to be established.</p>			
<p>Option 5: Starting from a blank page and creating a new strategic spatial strategy and a completely new full sets of policies.</p>	<p>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 and encourage active lifestyles</p>	<p>? ? - --? --? --? ? ? ?</p>	
<p>Commentary The current Local Plan is up-to-date, having recently been updated less than 5 years ago. Continual monitoring has shown it is a successful Plan and the initial assessment confirmed there was no urgent need to review the Local Plan. The outcomes at appeals have shown the policies in the Local Plan in the main provide a balanced and sound approach to planning in the borough. Crawley's Strategic Spatial Strategy shows that due to tight administrative boundaries, there are only limited opportunities for alternative options to meet development and environmental, amenity and infrastructure needs. Devising a completely new set of policies would be more time consuming, increasing the risk of the borough's local character policies being challenged as out-of-date.</p>			
<p>Option 6: Do not update the Local Plan and publish the review confirming the Plan is in conformity with national policy.</p>	<p>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>	<p>? ? - --? --? --? ? ? ?</p>	

<p>7. promote sustainable journeys</p> <p>8. provide sufficient infrastructure</p> <p>9. promote sustainable communities and encourage active lifestyles</p>		
<p>Commentary</p> <p>The initial ‘review’ of the Plan (set out in the Local Development Scheme 2017), highlighted the need to reconsider the Housing Need, Housing Sites, Affordable Housing, Economic Growth (EC1 – EC3) and Gatwick Airport (GAT1 – GAT4) policies.</p> <p>In particular, the Housing Need figure would be increasingly out of date, following the government’s introduction of the Standard Methodology. Without an up-to-date Plan, establishing the amount of housing that can sustainably be accommodated within Crawley’s administrative boundaries, challenges would be increasingly likely to housing applications, and Crawley’s local character policies could be put under greater pressure, in favour of the national policies in the NPPF. Individual policies would be left to potentially inconsistent appeal outcomes.</p> <p>Furthermore, without updated housing and employment need figures, duty to cooperate conversations would become more difficult to ensure Crawley’s unmet needs are met in full. Developments immediately adjacent to Crawley could potentially come forward without clear policy and evidence direction and may not help meet Crawley’s needs, Additionally, due to the front-loading of housing delivery anticipated within the borough, through the housing trajectory, the council would, over time, be measured in the national Housing Delivery Test against an annualised average, with lower delivery rates not taking account of the planned higher, over-delivery in the early Plan period.</p>		

The updated Spatial Strategy Options Appraisal is set out in the table below.

Spatial Strategy and Vision			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	<p>Scenario 2 and 3: a combination of the sub regional focus and Crawley borough focus.</p> <p>A combination of Scenarios 2 and 3 was 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.</p>		
Scenario 1: A sub region with a South East regional focus.	<p>1. minimise climate change</p> <p>2. adapt to climate change</p> <p>3. protect/enhance built environment</p> <p>4. Decent, affordable homes</p> <p>5. Maintain/support employment</p> <p>6. conserve/enhance biodiversity and landscape</p> <p>7. promote sustainable journeys</p> <p>8. provide sufficient infrastructure</p> <p>9. promote sustainable communities and encourage active lifestyles</p>	<p>?</p> <p>-</p> <p>-</p> <p>++</p> <p>++</p> <p>--</p> <p>+</p> <p>?</p> <p>--?</p>	
<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, as well as potentially those of the wider area.</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</p>			

which would be lost/reduced substantially by significant development levels (Criteria 2). 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). 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). 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). Many of the remaining undeveloped sites within the borough provide important roles for biodiversity and landscape (Criteria 6). 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). The impact on sustainable communities is uncertain. However, development at this level is considered would have a significant negative impact on encouraging healthy lifestyles, 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 (Criteria 9).

Scenario 2: A sub 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 and encourage active lifestyles	+

Commentary

Careful planning and ensuring developments constitute sustainable development will allow for positive impacts for Criteria 1, 2, 3, 6, 7, 8 and 9. The levels of objectively assessed needs for housing and employment may not be met in full when considered 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.

Mitigation is not required as no negative impacts have been 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 immediately adjacent to, or impacting on, Crawley’s boundaries when being delivered by a different administrative authority.

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.

This approach can be further managed by providing a greater policy steer through the Local Plan Review, supported by clearer joint evidence, in relation to the council’s approach towards considering development adjacent, or close to, the borough’s administrative boundaries. This will help mitigate visual, amenity and infrastructure impacts and ensure

	<p>development meets the needs, type, affordability and mix of Crawley’s residents and businesses. This avoids continued ad hoc strategic and non-strategic development coming forward on Crawley’s boundaries, without proper cumulative impacts being assessed and adequate infrastructure provided to meet identified and anticipated needs and Crawley local design considerations being taken into account.</p> <p>It has also allowed for the introduction of new policies in relation to urban extensions and the safeguarding of an area of search for a potential western link road, where this runs through Crawley.</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 and encourage active lifestyles 	<p style="text-align: center;">++ -? +? ++ ++? --? ++ ++ ?</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. 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 would have a significant negative impact on encouraging healthy lifestyles, 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> <p>Mitigation is required to ensure that 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 would mean the strict application of this Scenario would not be 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>The Local Plan Review has allowed for the introduction of policies seeking to increase densities and maximise effective use of land, whilst only securing high quality design and form which complement the character of Crawley. In addition, the housing typology policies allow for a greater policy framework for positive planning on the windfall sites which will come forward over the Plan period. The Local Plan Review process has included</p>			

securing evidence into the housing needs for specific groups within Crawley, including in terms of affordability, type and size mix of housing to ensure these are better accommodated within Crawley's boundaries, as well as in relation to discussions with neighbouring authorities (Scenario 2).

Significantly, it required the assessment of the extent of the safeguarding required for further expansion of Gatwick Airport to open up potential opportunities for balancing the needs of the Airport with other economic needs.

APPENDIX H: DRAFT CONSULTATION LOCAL PLAN POLICIES OPTIONS AND APPRAISAL

Each of the draft Regulation 19 consultation Local Plan 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	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	Option 2: Retain the adopted overarching policy which clearly defines sustainable development in a Crawley context. Option 2 has been chosen		
Option 1: 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 and Encourage active lifestyles	+? +? +? +? +? +? +? +?	
	Commentary 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.		
Option 2: Retain the adopted overarching policy which clearly defines sustainable development in a Crawley context.	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 and Encourage active lifestyles	++ ++ ++ + + ++ ++ ++	
	Commentary 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. This allows the key sustainability matters to be considered at the earliest stage of scheme development and maximise the opportunities for positive influence.		

Policy SD2: Enabling Healthy Lifestyles and Wellbeing			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	Option 3: To Provide a Strategic Overarching Policy relating to Wellbeing and Healthy Lifestyles and require a Health Impact Assessment Option 3 has been chosen		

<p>Option 1: To Provide a Strategic Overarching Policy relating to Wellbeing and Healthy Lifestyles</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 and Encourage active lifestyles 	<p>+? 0 0 0 0 +? +? +?+</p>	
<p>Commentary The NPPF requires local plans to take account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community. This option pulls together the various strands of planning policy which work together to support the healthy lifestyles and wellbeing objectives, specifically in relation to addressing some of the key health issues arising within the borough. However, this could become a token policy which is referred to but otherwise delivery and implementation is not clear.</p>			
<p>Option 2: To rely on the Plan policies and NPPF to deliver healthy lifestyles and well-being objectives</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 and Encourage active lifestyles 	<p>? 0 0 0 0 ? ? ? ?</p>	
<p>Commentary Much of the health and wellbeing agenda is already well-established as “good planning”. On this basis, the policies within the Plan, when read as a whole, alongside the NPPF already address much of land use planning’s influence on this agenda. However, this risks these requirements being considered as ‘nice to haves’ and overlooked in their strategic and cross-cutting benefits. The impacts from the implementation of these policies on the health agenda will be difficult to monitor and adjust through Plan reviews.</p>			
<p>Option 3: To Provide a Strategic Overarching Policy relating to Wellbeing and Healthy Lifestyles and require developers to submit evidence to support this through the introduction of a Health Impact Assessment.</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 and Encourage active lifestyles 	<p>+? 0 0 0 0 + + + +</p>	
<p>Commentary The NPPF requires local plans to take account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community. As with Option 1, this option pulls together the various strands of planning policy which work together to support the healthy lifestyles and wellbeing objectives, specifically in relation to addressing some of the key health issues arising within the borough. However, it clearly requires this to be demonstrated by applicants through the submission of planning applications.</p>			

Character, Landscape & Development Form

Policy CL1: Neighbourhood Principle			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
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, character and sustainability of the neighbourhoods.</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 and 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>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 consultations 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 Local Plan 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 and 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>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 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.</p>		

Policy CL2: Making Successful Places – Principles of Good Urban Design			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	<p>Option 1: Include a Local Plan policy to set out principles of good design that applicants should adhere to, in particular, to aid in the pursuit, direction and delivery of good quality, compact residential development.</p> <p>With the NPPF focus on sustainable, effective use of land, Option 1 has been chosen to enable planning applications to be assessed against identified 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 modal shift to more sustainable modes of transport, in particular cycling and walking, by creating a safer, more legible and interesting environment, using direct routes to places where people want to go (SA Objective 7) and socially sustainable communities (SA Objective 9).</p> <p>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). However, the opposite could also apply as Option 1 significantly enables and encourages increased compact development to come forward, subject to good design and planning and overall a better quality environment may attract investment into the town. Also, the requirement for new development to respect and build upon the components of existing urban structure/character, should help gain public support for more sustainable levels of higher density development, (SA Objectives 1, 2, 3 & 7). Many of England's best urban areas, widely seen as attractive places in which to live, have a compact form and relatively high density. However, these are places which have been designed, planned and built to a high standard of architecture and urban design.</p>		
Option 1: Include a Local Plan policy to set out principles of good design that applicants should adhere to, in particular, to aid in the pursuit, direction and delivery of good quality, compact residential development.	<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 and 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>Option 1 proposes a local policy within the Local Plan which should pursue the high quality design of all new developments. Importantly, this strategic policy will assist in both protecting and enhancing the built environment (SA Objective 3), and conserving the existing landscape (SA Objective 6). Good Urban Design is sustainable design. Urban form and structure have a major influence on climate change. There is a crucial relationship between form and space, buildings, energy, movement patterns, land take and location. This strategic policy actively encourages sustainable intensification of land and higher residential densities across the borough (SA Objectives 1, 2, 4, 6, 7 & 8).</p> <p>This option may lengthen the time taken to design and secure approval for appropriate, site specific schemes which properly craft new compact development form into existing urban areas. In terms of layout and residential amenity, compact development requires more thought, expertise and skill than is usually applied to more typical low density development. High quality architectural design, attention to detailing, materials and consideration of the needs of future occupants is essential in order to achieve a balance between increasing density, residential amenity and existing area character which may be difficult initially for smaller and more traditional developers to resource. Any difficulty or delay if it occurs, should be temporary, because attractive and well-designed compact development should allow developers opportunities to realise additional dwellings than would usually be the case (SA Objective 4), thus promoting the overarching objective of sustainable compact development (SA Objectives 1 & 7) which complements and enhance the character of local neighbourhoods and encourages 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 	<p>-/+</p> <p>-</p> <p>-</p> <p>?</p>	

	6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+ - - - -	
	<p>Commentary</p> <p>Although high quality design is a specific requirement of the NPPF, the presumption in favour of effective use of land, higher density and the substantial need for new housing, together dominate planning balance priorities. This could be to the detriment of other key place making considerations resulting in the approval of inappropriate and/or poor quality forms of compact development.</p> <p>Should the need to adhere to specific principles of good urban design be removed, higher density proposals are more likely to come forward which do not take proper consideration of existing character and sustainable movement principles, or the need for adequately design layouts appropriate for good compact residential accommodation and amenity, Without clear policy and guidance, it will be harder to (insist) on good quality as well as apply rigorous design review and control, and this could result in approvals for poor forms of higher density applications. This would generate negative public perceptions which can turn local opinion against compact, sustainable development.</p> <p>Land suitable for development is limited within the borough. Without locally relevant policy and guidance, it will be very difficult to intensify existing urban environments.</p> <p>There are many cases where higher density designs have produced a poor quality environment. Poor understanding and application of urban design, setting, services and infrastructural impact, lead to the detriment of existing character and neighbourhoods and create conflicts in specific areas such as vehicular traffic capacity and car parking both for original residents and new arrivals. Whether strategic or small in size, all new development needs to consider its place and impact within the wider context and new bespoke policy will help ensure this is achieved.</p>		
Option 3: Significantly simplify the existing policy and replace with one far less prescriptive.	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 and Encourage active lifestyles	-/+ - - ? + - - - - -	
	<p>Commentary</p> <p>The benefits of short, simple and succinct policy are recognised. However, compact development is by its nature very complex, particularly in relation to residential design and the balance between living requirements, basic amenity and sustainable movement patterns.</p> <p>Intensification/densification needs to occur within, between and alongside existing urban settings and within existing neighbourhoods. This requires careful planning in regard to new movement patterns and the complex work required concerning existing character, setting and heritage.</p> <p>There is a clear reason why so many spent the last 70 plus years building low density development across greenfield sites; this form of new development was relatively straightforward to understand and to design and plan for. It required minimal architect/design team expertise and it was cheap and quick with basic professional involvement.</p> <p>Should the detailed policy and justification as proposed by Option 1 (and subsequent related policies) be diluted, new development proposals are likely to come forward which do not take due regard of the extensive guidance produced by the government regarding good design over the years. This includes key documents carefully drafted to aid compact development, such as the National Design guide, National Model Design Code and the Urban Design Compendium.</p> <p>Furthermore, higher density proposals are more likely to come forward which do not take proper consideration of existing character and sustainable movement principles, or the need for adequately designed layouts appropriate for good compact residential accommodation and amenity. The mistakes of the 1960s and 70s where poor quality perceived high density proposals were constructed may be repeated (e.g. low density high rise) once again producing: (a) places</p>		

people don't want to live, (b) inappropriate forms of house type and (c) locations in the 'wrong place' in relation to sustainable movement; thus contributing little to sustainable modal shift or share.

Without clear and detailed policy, it will be harder to insist on good quality as well as apply rigorous design review and control, and could frequently result in approvals for poor forms of higher density applications. Generating negative public perceptions which can turn local opinion against compact, sustainable development.

Policy CL3: Movement Patterns, Layout and Sustainable Urban Design

Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	<p>Option 1: Develop a Local Plan policy to help ensure that while formulating proposals for the effective use of land, one of the key foundational principles is the objective of sustainable movement, and how this directs the form of development in the first instance.</p> <p>Choices made in relation to the layout and scale of new development strongly influence everyday human activity, particularly in relation to movement which dictates how people move within, through and around a place. As a result, it has a major influence on climate change. Government policy makes it clear that higher residential densities, public transport and sustainability are all interconnected and that they rely upon one another in order to achieve an increase in the supply of residential units.</p> <p>In particular, a new policy can focus attention on maximising opportunities for compact development and sustainable travel for all users in order to achieve increased levels of transport modal share (SA Objectives 1, 2 and 7). Enabling the planning process to better guide and direct how Crawley makes more effective use of its land will encourage existing communities, involve existing residents in the changing process and help dispel concerns (SA Objective 9).</p> <p>Higher levels of car use and associated parking as a result of increased density and intensification of existing urban areas is a particular worry for existing residents. Option 1 will help to allay these fears by directing higher density ranges only to locations where high frequency, high capacity, segregated public transport is in place, thus allowing for new development without the associated need for new residents to depend on their private car for everyday travel. Option 1 also promotes sustainable movement by stating that all development should put people before traffic and encourage walking and cycling through establishing a layout of pathways which understand and respond to the wider borough pattern of movement, following desire lines accessing the places where people need and wish to go. Option 1 will also require all developments of significant scale to be designed to high or moderate density (where appropriate), to create efficiencies in the use of resources and the delivery of improved movement infrastructure, particularly sustainable public transport.</p>		
Option 1: Develop a Local Plan policy to help ensure that while formulating proposals for the effective use of land, one of the key foundational principles is the objective of sustainable movement and how this should dictates to the new proposals for compact development in the first instance.	<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 and Encourage active lifestyles 	<p style="text-align: center;">++ ++ ++ ++ + + ++ ++ ++</p>	
<p>Commentary</p> <p>Compact development is about so much more than density. Government guidance including the National Design Guide, the Urban Design Compendium and CABE/HCA guidance identifies the primary elements of urban form as: Existing Character; Layout; Scale; Appearance; Public Realm; and Movement (density itself is just one aspect of layout and scale). Particular attention needs to be applied to movement patterns, which are foundational to new development form and essential if we are to encourage and facilitate sustainable travel. This will help to establish walkable neighbourhoods and ensure new development can be located so as to make public transport more financially viable and even help pay for considerable improvements in the quality of public transport options. With larger schemes, there can be a welcome side-effect in that the infrastructural improvements they trigger can also then both encourage and enable modal shift in the existing, adjoining neighbourhoods.</p> <p>Urban form influences users' activity and movement within, through and around a place. As a</p>			

	<p>result, it has a major influence on climate change. Almost 30 per cent of carbon emissions come from buildings and, according to DEFRA, in Crawley, a further 23 to 42 per cent comes from transport.</p> <p>Government policy makes it clear that higher residential densities, public transport and sustainability are all interconnected and that they rely upon one another in order to achieve an increase in the supply of residential units. Option 1 would direct high density development to appropriate locations such as the town centre and other areas that are well served by high frequency, reliable public transport.</p>		
Option 2: Rely on the NPPF and respond to new development proposals as they come forward on an ad hoc basis.	<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 and Encourage active lifestyles 	<p>+?</p> <p>0?</p> <p>-</p> <p>0</p> <p>0</p> <p>-</p> <p>--</p> <p>-</p> <p>?</p>	
<p>Commentary</p> <p>Without new places and new development being planned, arranged and designed properly (from the outset) wider more long term opportunities to secure sustainable living will very likely be missed. Although the NPPF emphasises that higher residential densities, public transport and sustainability are all interconnected and that they rely upon one another in order to achieve an increase in the supply of residential units, it stops short of specific detail outlining how this will be achieved in practice. Instead, it places the onus on local authorities to translate, direct and define how such objectives can apply locally through bespoke local policy, locally relevant character assessment and detailed guidance.</p> <p>Relying simply on individual new development coming forward, to adequately define, consider and respond to the wider context, and sustainable transport, is unrealistic.</p> <p>The commercial viability of frequent and reliable public transport depends on compact development and minimum densities. Compact neighbourhoods provide a more substantial and reliable customer base for public transport services. In turn, frequent and reliable services encourage a shift away from private car use, research suggests net densities of 60 dwellings per hectare are necessary to sustain a dependable, frequent and high capacity public transport service.</p>			

Policy CL4: Compact Development – Layout, Scale and Appearance			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	<p>Option 1: A policy will be created in the Local Plan that will pay particular attention to the layout, movement and scale aspects of new development form to aid in the promotion and delivery of compact development (SA Objective 1 and 2). It will be focused on taking advantage of existing sustainable public transport infrastructure, with a view to optimising opportunities for new compact development at moderate and high density ranges.</p> <p>Option 1 has been chosen as the incremental development of land could preclude the potential phasing of more comprehensive, and increased levels of compact development. Greater clarity, practical advice and local knowledge is needed to identify locations for higher density. Initially potential will be identified as part of opportunity studies following the completion of Area Based Character Assessments. Subsequently major new development and all significant development (unless the existing character justifies a lower figure), will be steered to locations in the borough where sustainable, high capacity, high frequency, segregated transport infrastructure already exists (or can cost effectively come forward in the future) (SA Objective 7). Increased levels of development, intensified in such locations will help fund the cost of delivering increased sustainable public transport options within existing urban areas (SA Objective 8), in order to support the commercial viability of such infrastructure (SA Objectives 7 and 8). This will significantly help encourage increased mode shift to sustainable public transport by the existing population.</p>		
Option 1: A policy will be created in the Local Plan that will pay particular	<ol style="list-style-type: none"> 1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 	<p>++</p> <p>++</p> <p>+</p>	

attention to the layout and scale of new development to aid in the delivery of compact development. It will be focused on local character and existing movement infrastructure with a view to optimising opportunities for and to take advantage of the potential for compact development and high capacity sustainable transport. 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.	5. Maintain/support employment	++	
	6. Conserve/enhance biodiversity and landscape	+	
	7. Promote sustainable journeys	+	
	8. Provide sufficient infrastructure	++	
	9. Promote sustainable communities and Encourage active lifestyles	++	
	<p>Commentary</p> <p>Land suitable for development is limited within the borough so intensification of land use should not be prevented from coming forward (subject to adherence to other relevant policies, in particular character, heritage, the provision of sustainable public transport and residential amenity). This policy should help promote the intensification of existing urban environments (SA Objective 1). This in turn will help reduce the pressure and case for new development continuing to spread, unsustainably across the West Sussex countryside, in the form of low density, car dependant settlement (SA Objectives 1, 2, 6 and 7).</p> <p>Where there are opportunities for more sustainable, efficient use of land, new policy is needed in order to guide and promote more compact forms of development which not only uses less land, but also facilitates efficiencies in the use of other resources, including energy supply, services and transportation (SA Objectives 4, 5 and 8).</p> <p>There is a further positive impact related to SA Objective 3 as focusing compact form in places suitable for change should help reduce development pressure on valued built environment and valued character settings within the borough.</p>		
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 and Encourage active lifestyles	-?	
	<p>Commentary</p> <p>Without clear policy being in place to target minimum density ranges and without additional guidance in regard to the quality of compact form, there will be less public support for higher density ranges, thus making it harder for sustainable efficient use of land being achieved. This is particularly evident in relation to matters of movement, specifically the fear of increased congestion and competition for car parking spaces within existing communities where any new development is proposed, not least that of compact form. The commentary to Option 3 considers this in detail. On the other hand, without compact development, high capacity sustainable transport infrastructure will be commercially unviable and lower density, car dependent suburban form will continue to spread across the countryside and opportunities to create efficiencies in the use of other resources and services will be lost.</p>		
Option 3: Delete policy and rely on the NPPF and area specific Masterplans.	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 and Encourage active lifestyles	++	

Commentary

Without this policy, opportunities for significant levels of new compact form may be lost and /or viewed as economically unviable. Policy CL4 reduces the need and associated development cost and spatial requirements required by private vehicle use. Without clear local based policy new, unsustainable low-density development may be promoted which could have been compact in form. Policy CL4 insists that applications for significant developments or for a group of smaller sites which, on aggregate, form substantial wider area development must be of moderate and high density. They can either take advantage of existing sustainable movement infrastructure or by providing same. Where new compact development occurs, it does not have to follow that there will be a significant denigration or loss of the established movement patterns and choices already enjoyed by an adjoining or host community. However, all new development risks bringing extra congestion and parking issues which is a primary worry for existing communities when new development is proposed. As such a majority of new development ends up being built to a low density as existing road infrastructure can usually be readily upgraded and improved to accommodate it. As a nation we are generally ‘used to’ and accepting of how private vehicular movement impacts on our urban environments and general quality of life, but this is lower density development and its related movement need. New compact development, increased density, by its very nature has the potential to greatly increase the levels of private vehicle use within a given area.

Reducing car use is not just about achieving sustainability and net zero targets in and of itself. It is also essential so that the additional vehicular movement generated by new development does not negatively impact existing communities, in particular new traffic congestion and the potential damage resulting from additional car parking needs. It will remove one of the primary objections to increases in density and basic planning requirements to achieve highways consent. In order for it to be attractive for people to leave their car at home (not to mention choosing to live without car ownership), a number of basic movement parameters are essential. No single area specific masterplan or overarching NPPF requirement can ensure these parameters are adhered to nor be appropriate in any given area. Bespoke locally based policy and urban design assessment is required.

Specifically, development needs to be within 640m - 800m or 5–8-minute safe walking distance of high capacity, high frequency, segregated public transport infrastructure which brings people to the further away places they regularly need to travel to such as large town centres and employment districts. Cycling and walking is very suitable for shorter local journeys, supplemented by a taxi for days when the weather is just too bad. At a minimum, homes should also be within 5 minutes’ walk of basic local neighbourhood facilities such as a food store and within 10 minutes to a primary school or health centre. Ideally wider area facilities, e.g. library or swimming pool, should be within 15 minutes’ walk with distances reduced by optimal active travel infrastructure and adherence to desire lines. As such, new development should connect to and capture, LCWIP based active travel route, cycle infrastructure and related urban design principles outlined in Policies CL2 and CL3.

Without these basic movement parameters people will instinctively and understandably be attracted to private car use and, therefore, moderate and high-density ranges will understandably be continually resisted. Without area specific local policy, the default outcome will alternate between the delivery of a limited number of ‘car free’ developments around Crawley’s two main train stations and refusals for compact proposals in most locations on the basis of lack of infrastructure.

Policy CL5: Significant Development, Masterplanning and Design Success			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	<p>Option 1: Create a new policy within the Local Plan that requires Masterplans be prepared for applications of significance to be prepared which deal with both the development site and its wider context.</p> <p>Successful masterplans should set out how to create and sustain excellent places for living, work and play. Option 1 has been chosen to enable planning applications to be assessed against a comprehensive approach to an area, to ensure effective use of land and cohesive design and layout which must chart overall urban design guidance and intent (SA Objectives 1, 3, 4, 6, 7 and 9). Design development is an iterative process and for compact sustainable development, in particular, good design needs to consider very many factors and guiding parameters and this will usually involve constant and frequent reviews of all the issues as more information is obtained. Masterplanning and design coding will be essential to aid developers to appropriately, sensitively and confidently achieve higher, more sustainable density ranges (SA Objectives 1, 2 and 7).</p>		

	When masterplans are produced by the local authority or in collaboration with and/or resourced by a developer but under the lead of local authority officers, such output is likely to be viewed as genuinely independent and local plan and design led in the first instance. As such it is more likely to achieve community support. A part of this, genuine community engagement, including design testing and workshop sessions are key (SA Objectives 3, 4, 6, 9).		
Option 1: Create a new policy within the Local Plan that requires significant development to be prepared against development brief and masterplans.	<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 and Encourage active lifestyles 	<p style="text-align: center;">++ ++ ++ ++ + ++ ++ + +</p>	
	<p>Commentary This policy does not stand alone but is built upon the requirements of earlier related policies. Strategic Policy CL2 for example requires major applications to demonstrate and document how the positive and valued components of existing, wider area rural/urban structure have guided and directed the form of new development (SA Objectives 3 and 6). In addition, Area-based character assessment should be used to identify a clear design vision and the opportunities available and in turn use these opportunities to define the types of place(s) the proposal aims to achieve, how it will contribute to the sustainable development of the area, and how the existing special qualities of an area will be reflected in new proposals, while not preventing or discouraging appropriate innovation or change (such as increased densities) (SA Objectives 1, 3,4 and 6). In order to encourage intensification within existing neighbourhoods, where appropriate, clear parameters have being established preceding policy, upon which any Masterplan or design code should be based, all of which aims to: (a) enable /unlock the potential for new sustainable development form while also: (b) protecting existing character and the established standard of amenity enjoyed by existing residents (SA Objectives 3, 6), and: (c) provide clear parameters and minimum thresholds to help guide developers and promoters in how and where to focus on intensification. (SA Objectives 1, 4, 7). For example, supporting policy clarifies that for schemes of moderate density and above Area Based Character Assessments must be used, the identification of opportunities and the design vision must be developed with local communities, and that design principles and parameters reflecting this must be set out for both the application site and surrounding area. For major and/or significant proposals (or where overall cumulative development is significant) to truly be sustainable in form (to achieve high levels of sustainable mode share and moderate levels of density) the design development process, at pre-submission stage needs to consider a considerable array of factors and interrelated detail. In order to secure and win support for sustainable compact form across the town, careful project brief development is required and it is essential that new policy clarifies how the design and development process itself is communicated, and developed at feasibility and concept stage using the Masterplanning process, then later developed in detail and secured via design coding. The design review process can also help ensure the best possible outcomes are being considered up to and including consent stage. Local Authority led Masterplanning and coding will not only help to clarify design expectations early in the planning process, set a clear vision for the site, inform infrastructure and viability assessments and identify requirements for developer contributions or other investment, it will also more likely be viewed as community and officer generated. It can result in independent and transparent proposals for change which can more easily be formally adopted as a Supplementary Planning Documents. This in turn allows for greater certainty and speed at planning consent stage for proposals, something which individually assessed, piecemeal proposals would find more challenging, meeting significant opposition, particularly where they aim to achieve intensification / compact form. As such much development would revert to a less sustainable, less compact form in order to achieve some return. Sustainable, compact development requires more thought, expertise and craft than is usually applied to low density development (particularly in relation to overall layout, movement and the amenity afforded to users/occupants).</p>		
Option 2: Rely on	<ol style="list-style-type: none"> 1. Minimise climate change 2. Adapt to climate change 	<p style="text-align: center;">- -</p>	

the NPPF.	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		
	8. Provide sufficient infrastructure	--	
	9. Promote sustainable communities and Encourage active lifestyles	--	
		-	
	Commentary		
	<p>Relying simply on individual new development coming forward to adequately consider, define, and respond to key place making principles such as existing character, compact development and sustainable transport, is unrealistic. For larger applications, comprehensive masterplans and project briefs (which are based on latest government guidance and proposed Crawley Local Plan Policies CL1 – CL5) are essential in order to clearly and methodically capture and address the varied parameters concerning sustainable development form. Such work is also needed in order to assist in setting out the rational and decision making processes used in identifying key components of the context and character of an area or site. Used effectively, these tools help identify and deliver new attractive, high quality landscape and built forms, private space, quality homes and public realm at higher density ranges and allow the general public to understand the methodology, argument and evidence base underlying the key place-making decisions. Without such documented processes, support for change and the intensification of land use (and ultimately sustainable new development), will more likely prove controversial and shrouded in doubt and suspicion. Integrating new sustainable forms of development into any place is difficult but particularly when it is being introduced at higher density ranges. As such, more time needs to be spent at the planning, consultation and design stage in order to win over the hearts and minds of the public. Although this is reflected in the NPPF, local policy is required to help clarify the extent to which this is needed. New policy for example states that major applications should use illustrative tools such as accurate 3D massing models to communicate proposals. In order to achieve compact sustainable form, more work is needed, prior to consent than that typically required for low density, un-sustainable, car-based neighbourhoods. New policy is needed to ensure developers are aware of and understand the extent of additional consideration required and related thresholds.</p>		

Policy CL6: Structural Landscaping			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	<p>Option 1: Retain a 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 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 Objectives 3 and 6) and moreover, minimise climate change (SA Objectives 1 and 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: Retain a 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 and Encourage active lifestyles	+? ++ ++ + + ++ + + ++	
Commentary			
<p>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</p>			

	could also reduce development potential by highlighting the negative impacts of over-development or development that would not protect or enhance the borough (SA Objectives 4, 5 and 8).		
Option 2: Delete policy and rely on NPPF.	<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 and 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>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.</p>			

Policy CL7: Important and Valued Landscape and Views

Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	<p>Option 1: Retain a policy within the Local Plan which identifies a number of important views and valued landscapes, and endeavours to protect and/or enhance those assets through the restriction of development that would adversely affect them, and expand the policy to include the valued landscapes.</p> <p>Option 1 has been chosen, since it is believed that not managing the important views and valued landscape (Option 2) could lead to incremental development that could erode them fundamentally over time or in one instance (SA Objective 3 and 6). In addition, soft landscaping which has an important role in many views can play a large part in minimising climate change (SA Objective 1) and 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.</p>		
Option 1: Retain a 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, and expand the policy to include the valued landscapes.	<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 and Encourage active lifestyles 	<p>+</p> <p>0</p> <p>++</p> <p>+</p> <p>0</p> <p>++</p> <p>0</p> <p>0</p> <p>+</p>	
<p>Commentary</p> <p>There are many views and valued landscapes in the borough that are worthy of protection and enhancement. A number of such features 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.</p> <p>In addition, by better identifying and protecting the extent and setting of these quality elements of existing character (especially views vistas and valued landscape), there will be opportunities for a more genuine debate about the opportunities for change in the areas in between, and clearer evidence to support innovative change such as new compact form and intensification in general.</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 	<p>-</p> <p>-</p>	

	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 and 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 and raise overall opposition to all attempts to achieve intensification of existing urban places and compact form in general.		
Option 3: Retain the adopted 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 and Encourage active lifestyles	/ + ++ / / ++ + + +	
	Commentary There are many views and valued landscapes 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 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.		

Policy CL8: Development outside the Built-Up Area			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	Option 1: Retain a 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 maintain Crawley's compact setting and 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. 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: Retain a local policy to maintain Crawley's compact nature and attractive setting whilst conserving and enhancing 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 and Encourage active lifestyles	+? / + / / + + / +	

	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.	<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 and Encourage active lifestyles 	<p style="text-align: center;">+ / + / / / + / -</p>	
	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.		

Policy CL9: High Weald National Landscape Area of Outstanding Natural Beauty			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	Option 1: Have regard to the High Weald Management Plan when considering proposals in the National Landscape. Having regard to the National Landscape designation and the High Weald Management Plan is the most suitable option as National Landscape land is highly valued for its contribution to the landscape.		
Option 1: Have regard to the High Weald Management Plan when considering proposals in the National Landscape.	<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 and Encourage active lifestyles 	<p style="text-align: center;">/ / + / / ++ / + +</p>	
	Commentary Respecting the high value landscape of the wider National Landscape is of benefit to residents of Crawley and those who live and work in the National Landscape. Active lifestyles are further encouraged through an enhanced landscape that promotes benefits to wellbeing through an area of well managed natural capital. This option encourages investment in wellbeing through supporting the latest High Weald Management Plan 2019-2024 benefiting SA Objectives 3, 6 and 9.		
Option 2: Not recognising the High Weald Management Plan and requiring a local assessment 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 and Encourage active lifestyles 	<p style="text-align: center;">- - + - - + / / +</p>	
	Commentary The High Weald National Landscape Unit has been set up to advise on National Landscape 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 National Landscape.

Design & Development Requirements

Policy DD1: Normal Requirements of All New Development			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	<p>Option 1: Retain a policy within the Local Plan that sets out specific requirements that applicants should adhere to.</p> <p>Option 1 has been chosen to enable planning applications to be assessed against identified factors that contribute to the creation of high quality development, landscape and open space (SA Objective 3 and 6). This policy requires new development to provide or retain a good standard of amenity for all existing and future users/ occupants of land and buildings and not cause unreasonable harm to the amenity of the surrounding area (SA Objective 4 and 9). It also establishes a presumption in favour of retaining and reusing existing buildings, structures and landscape features (SA Objectives 1 and 2).</p> <p>Option 1 could reduce development potential by highlighting the negative impacts of over-development or development that would not protect or enhance the borough and /or be of poor amenity (SA Objectives 3, 4, 5, 6 and 9).</p>		
Option 1: Retain a policy within the Local Plan that sets out specific 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 and 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>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 and to promote sustainable communities (SA Objective 9). However, 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 and 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 NPPF does not contain detailed development management policies suitable to consider all levels of planning application against.</p>			

Policy DD2: Inclusive Design			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	Option 1: Option 1 has been chosen		
Option 1: To develop a separate policy requiring accessibility standards for all new buildings	<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 and Encourage active lifestyles 	<p style="text-align: center;">0 0 +? ++ +? 0 +? / ++</p>	
	<p>Commentary</p> <p>By providing a separate policy, the expectations of the council in relation to accessibility targets is clear from the outset. The requirement for it to apply to all new dwellings and all new buildings levels the starting position and reflects the evidence of the council in relation to the need for accessible buildings to encourage healthy lifestyles and meet the needs of the borough's resident and working population. The requirement for accessibility measures may incur costs associated with design and additional space requirements. However, this has been considered as part of the Plan's viability assessment and once established as a policy would be reflected in land prices. Measures to address accessibility and adaptability are better considered at the earliest stage of preparing proposals, layout and design.</p> <p>The adaptation of existing and historic buildings may have a potential harmful effect. However, with a clear policy requirement, this should be addressed early on in the design stages.</p> <p>There may be circumstances where it is not possible to meet the policy requirements. This can be managed by including exceptions in the policy to allow flexibility in such circumstances.</p> <p>It is not considered this policy will impact on climate change mitigation or adaptation. There is likely to be a neutral impact on infrastructure. However, there could be benefits to promoting sustainable journeys as people become more able to access buildings.</p>		
Option 2: To retain the national accessibility standards for all new dwellings in the space standards 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 and Encourage active lifestyles 	<p style="text-align: center;">0 0 +? + / 0 0 / +</p>	
	<p>Commentary</p> <p>Whilst the potential sustainability benefits of this approach remain positive, the requirement for all new dwellings to meet the accessibility and adaptability standards has been largely unnoticed when in the existing internal space standards policy. The benefit of including it there should be that it is considered at the same time as the design and layout of a scheme. However, in practice it is missed until matters such as unit sizes and layout have been set and it is much more costly and complex to meet these requirements in retrospect.</p>		
Option 3: To require a percentage of new buildings to meet accessibility standards	<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 and Encourage active lifestyles 	<p style="text-align: center;">0 0 / +? +? 0 0 0 +?</p>	

	<p>Commentary</p> <p>The council's evidence confirms the borough's need for buildings to meet the needs of all. Due to the large proportion of buildings which is made up from the existing stock, it is considered all new buildings are required to meet accessibility needs. This is in line with the requirements of the NPPF. There is no evidence to suggest only a proportion of new buildings is required for this. Furthermore, it was accepted by the Inspector of the adopted Local Plan that at any point in a person's life the need for an accessible property could arise, and this would be the time that a building designed to allow for its adaptation would be needed.</p>		
Option 4: To require a percentage of new dwellings to meet accessibility standards	<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 and Encourage active lifestyles 	<p>0</p> <p>0</p> <p>/</p> <p>+?</p> <p>/</p> <p>0</p> <p>0</p> <p>0</p> <p>+?</p>	
	<p>Commentary</p> <p>The council's evidence confirms the borough's need for buildings to meet the needs of all. Due to the large proportion of buildings which is made up from the existing stock, it is considered all new buildings are required to meet accessibility needs, not just dwellings. This is in line with the requirements of the NPPF. There is no evidence to suggest only a proportion of new dwellings is required for this. Furthermore, it was accepted by the Inspector of the adopted Local Plan that at any point in a person's life the need for an accessible property could arise, and this would be the time that a building designed to allow for its adaptation would be needed.</p>		
Option 5: To allow the market to decide what accessibility standards to meet above the minimum Building Regulations standard.	<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 and Encourage active lifestyles 	<p>0</p> <p>0</p> <p>/</p> <p>-</p> <p>-</p> <p>0</p> <p>0</p> <p>0</p> <p>--</p>	
	<p>Commentary</p> <p>This would not change the position from the existing situation, and would not meet the needs established by the council's evidence. Therefore, it would not address the requirements and expectations of the NPPF adequately.</p>		

Policy DD3: Standards for All New Dwellings (including conversions)			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	<p>Option 4: To include standards for internal space within a Local Plan Policy and require adequate and usable outdoor space, and to encourage dual aspect floor plan layouts which will can facilitate increased use of natural ventilation and daylight penetration linking with further guidance set out in SPD to support development proposals.</p> <p>Option 4 was chosen to provide greater levels of certainty for the development industry and to ensure the homes built within Crawley offer the greatest quality of life standards. It also encourages unit layout and design which better exploits natural and non-carbon generating solutions in regard to ventilation/cooling and use of day light in residential units, whilst maintaining housing delivery and remaining in conformity with national policy.</p>		
Option 1: To include standards for external and internal space within a Local Plan 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 	<p>++</p> <p>+</p> <p>++</p> <p>+?</p> <p>0</p> <p>++?</p> <p>0</p>	

	8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 + +	
	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 (SA Objectives 1, 2 and 3). The policy would ensure the Local Plan has a significant positive impact on SA Objective 3, and would provide decent, affordable homes. However, the numbers of homes may be reduced because of the outdoor space requirements. Good layout and space standards promote sustainable communities and encourage active lifestyles (SA Objective 9) by ensuring amenity between neighbouring properties are protected. They also allow for children to have access to adequate outdoor space for safe, exercise and outdoor play, encouraging hobbies such as gardening and home-grown food opportunities. The policy is not considered to have an impact on SA 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 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+? +? +? +? 0 +? 0 0 ?	
	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 SA 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 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 and Encourage active lifestyles	0 0 +? +? 0 0 0 0 0	
	Commentary Without any local policy it would be impossible to insist on locally distinctive standards or provide certainty.		
Option 4: To include standards for internal space within a Local Plan Policy and require adequate and usable external space, linking with further guidance set out in SPD to support development proposals.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+? +? + + 0 +? 0 0 +	
	Commentary The inclusion of internal space standards in the Local Plan Policy allows for greater level of		

consistency of application of policy. Suitable homes with sufficient space and the potential for adaptation are likely to be more sustainable over the life of the dwelling (SA Objectives 4). The Policy ensures the Local Plan has a positive impact on the provision of decent, affordable homes and, through the application of good design principles, can support the protection and enhancement of the built environment (SA Objective 3).

Good layout and space standards promote sustainable communities (SA Objectives 9). Requiring adequate and usable external space will potentially ensure benefits for climate change, as well as for biodiversity and landscape, and encourage active lifestyles (SA Objectives 1, 2 and 6).

Although this approach will offer less certainty of delivery than external standards set out in Policy it will allow for greater flexibility for schemes to be considered on a site-by-site basis.

The policy is not considered to have an impact on SA Objectives 5, 7 or 8.

Policy DD4: Tree Replacement Standards

Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	<p>Option 3: Split the existing policy into two: merging the requirement for additional planting of trees and soft landscapes to mitigate the visual impact of new development with the Biodiversity Net Gain Policy (GI2) and retaining the requirement for additional planting compensating for loss of trees as a standalone policy (Policy DD4).</p> <p>Option 3 has been chosen as replacement tree planting would have a very positive impact on SA Objectives 1, 2, 3 and 6, and some positive impact in relation to SA Objectives 7 and 9. There would be a neutral impact on the provision in respect of SA Objectives 4, 5 and 8 although a more attractive environment could assist in attracting investment. Separating out this requirement and merging the element for landscaping purposes with the biodiversity net gain clarifies the purpose and expectations from the policies.</p>		
Option 1: Split the existing policy into two policies one requiring additional planting of trees and soft landscapes to mitigate the visual impact of new development and a second requiring additional planting and compensating for loss of trees (DD4).	<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 and 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>The policy being split into two acknowledges the difference between visual amenity and requirement to replace existing trees for their visual impact. This policy clarifies the requirements for tree replacement and the effect compensation through planting would have on SA Objectives 1, 2, 3 and 6, as well as the positive impacting relations to SA Objectives 7 and 9 of living and or working in a more positive environment enhanced by natural capital.</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 communities and Encourage active lifestyles 	<p>+</p> <p>+</p> <p>+</p> <p>/</p> <p>/</p> <p>+</p> <p>/</p> <p>/</p>	
	<p>Commentary</p> <p>The NPPF offers general guidance in terms of dealing with impacts and mitigation. This approach would not necessarily deliver as many 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 and 9). The approach may be slightly more positive in terms of the amount of development (SA Objectives 4, 5 and 8).</p>		
Option 3: Split the existing policy into two: merging the	<ol style="list-style-type: none"> 1. Minimise climate change 2. Adapt to climate change 	<p>++</p> <p>++</p> <p>++</p>	

requirement for additional planting of trees and soft landscapes to mitigate the visual impact of new development with the Biodiversity Net Gain Policy (GI2) and retaining the requirement for additional planting compensating for loss of trees as a standalone policy (Policy DD4).	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 and Encourage active lifestyles	+	
	Commentary		
	The policy been split into two acknowledges the difference between visual amenity and requirement to replace existing trees for their visual impact. This policy clarifies the requirements for tree replacement and the effect compensation through planting would have on SA Objectives 1, 2, 3 and 6, as well as the positive impacting relations to SA Objectives 7 and 9 of living and or working in a more positive environment enhanced by natural capital. By incorporating the visual amenity landscaping need for new trees into the biodiversity net gain policy this ensure the flexibility of use for new provision to meet the wider priorities for tree and landscape provision without confusion, or double counting potentially impacting on viability of development proposals unnecessarily, and provides a clearer policy basis to determine schemes against.		

Policy DD5: Aerodrome Safeguarding			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	Option 1: Option 1 has been chosen as the most sustainable approach. Including a dedicated aerodrome safeguarding policy will enable the Local Plan to make clear that aerodrome safeguarding is a borough-wide requirement that will need to be taken into account in the planning process. Making applicants aware of this at an early stage will simplify the planning process and ensure that aerodrome safeguarding requirements are planned into development.		
Option 1: Add a policy on aerodrome safeguarding	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 and Encourage active lifestyles	0 0 ++ + + 0 0 0 0 ++	
Commentary Aerodrome Safeguarding and the requirements to consult are set out under Planning Circular 01/2003. However, recently published evidence (Lichfield in liaison with General Aviation Awareness Council, July 2018) finds that, in general terms, the guidance in Planning Circular 01/2003 is not being applied consistently by local planning authorities, and suggests that for clarity, where administrative areas contain an EASA certified aerodrome, a dedicated aerodrome safeguarding policy should be included in Local Plans in order to identify the requirements of Aerodrome Safeguarding to support the safe operation of Gatwick Airport.			
Option 2: Don't include a policy on aerodrome safeguarding and continue to rely on Planning Circular 01/2003	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 and Encourage active lifestyles	0 0 + +? +? 0 0 0 0 +?	
Commentary Option 2: Relying on Planning Circular 01/2003 rather than a specific policy would still enable aerodrome safeguarding to be considered through this approach, by not including a dedicated policy,			

the Local Plan would not be responding to the recommendations of the Lichfield work. The approach would not add the necessary clarity to the planning process. Option 2 would not address the issues necessitating a policy that are discussed under Option 1. Therefore, Option 2 is not supported.

Policy DD6: Advertisements			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	<p>Option 1: Include a policy relating to the treatment of applications for express advertisement consent, informed by national guidance.</p> <p>This option is preferred on the basis of its stronger benefits in terms of protection of the amenity of the built and natural environment, public safety, and the maintenance of a strong employment base.</p>		
Option 1: Include a policy relating to the treatment of applications for express advertisement consent, informed by national guidance.	<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 and Encourage active lifestyles 	<p>0</p> <p>0</p> <p>++</p> <p>0</p> <p>+</p> <p>++</p> <p>0</p> <p>0</p> <p>+</p>	
<p>Commentary</p> <p>Applications for advertisement consent should be determined in accordance with amenity and public safety, which relate to SA Objectives 1, 6 and 9. Effective and clear regulation of advertisements also has the potential to support SA Objective 5, through businesses being able to judge more easily what is and is not likely to be acceptable.</p>			
Option 2: Do not include a specific advertisements policy, and leave applications to be determined in accordance with other policies together with national guidance.	<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 and Encourage active lifestyles 	<p>0</p> <p>0</p> <p>+</p> <p>0</p> <p>+?</p> <p>+</p> <p>0</p> <p>0</p> <p>+?</p>	
<p>Commentary</p> <p>This option is not considered to have any negative impacts, owing to the availability of national guidance on adverts and more general design guidance in the Local Plan and Supplementary Planning Documents. However, in this scenario the benefits in respect of amenity, public safety and support for businesses are considered to be smaller and/or less certain than in the case of Option 1.</p>			

Policy DD7: Crossovers			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	<p>Option 1: A policy to allow crossovers.</p> <p>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 is not adversely affected.</p>		
Option 1: A policy to allow crossovers.	<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 	<p>?</p> <p>-</p> <p>?</p> <p>0</p> <p>0</p> <p>+</p>	<p>Mitigation for both SA Objective 2 and 6 will be through other policies within the Local Plan (notably in the Character and Design; Landscape Character and Landscaping; and Green Infrastructure chapters). In addition, Policy DD7 states that crossovers</p>

	landscape	-	will only be permitted where the amenity of the street scene is not adversely affected.
	7. Promote sustainable journeys	0	
	8. Provide sufficient infrastructure	0	
	9. Promote sustainable communities and Encourage active lifestyles		
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	0	
	5. Maintain/support employment	0	
	6. Conserve/enhance biodiversity and landscape	-	
	7. Promote sustainable journeys	-	
	8. Provide sufficient infrastructure	0	
	9. Promote sustainable communities and Encourage active lifestyles	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.			

Heritage Assets

Policy HA1: Heritage Assets			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	Option 3: Include overarching policy for all heritage assets (including undesignated heritage assets), with policies relating to specific types of designated assets within Crawley.		
	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.		
Option 1: Have no policy on heritage assets.	1. Minimise climate change	0	
	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	0	
	8. Provide sufficient infrastructure	0	
	9. Promote sustainable communities and Encourage active lifestyles	-	
	Commentary		
The NPPF instructs Local Planning Authorities to include a “positive strategy for the conservation and enjoyment of the historic environment”. Option 1, which is not to include anything would, therefore, not be an appropriate option.			
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.			

	The lack of clarity given to a new policy approach could lead to inappropriate developments and the loss of key features throughout the town.		
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 and Encourage active lifestyles 	<p>0 ? + 0 / 0 0 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, with policies relating to specific types of heritage assets within Crawley.	<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 and Encourage active lifestyles 	<p>0 ? ++ 0 / 0 0 0 +</p>	
<p>Commentary</p> <p>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 policies, the council will be able to provide clarity to a developer as to what will be required when working on different projects.</p>			

Policy HA2: Conservation Areas			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
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 and Encourage active lifestyles 	<p>0 ? - 0 / 0 0 0 ?</p>	
<p>Commentary</p> <p>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 Policy HA1. This option was ruled out due to the Local Plan approach for Policy HA1.</p>			
Option 2: Include Policy for Conservation	<ol style="list-style-type: none"> 1. Minimise climate change 2. Adapt to climate change 	<p>0 ?</p>	

Area designation.	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	0	
	9. Promote sustainable communities and Encourage active lifestyles	+	
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.			

Policy HA3: Areas of Special Local Character			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	Option 3: Include policy for ASLC 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 and Encourage active lifestyles	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 Policy HA1. This option was ruled out due to the Local Plan approach for Policy HA1. This option would not give significant weight to any locally distinctive designations 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 and Encourage active lifestyles	0 ? + 0 0 + 0 0 +	
Commentary			
A policy relating to ASLCs, Locally Listed Buildings and Historic Parks and Gardens was considered as a way of reducing the number of policies in the Local 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 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	0 ? ++ 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 and Encourage active lifestyles	+	
Commentary			
By including a policy for the ASLCs specific requirements can be set in accordance with their significance and the objectives of the designation.			

Policy HA4: Listed Buildings and Structures

Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
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 and 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 Policy HA1. This option was ruled out due to the Local Plan approach for Policy HA1. 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 and Encourage active lifestyles	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 Local 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.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and	0 ? + 0 / 0	

	landscape		
	7. Promote sustainable journeys	0	
	8. Provide sufficient infrastructure	0	
	9. Promote sustainable communities and Encourage active lifestyles	+	
Commentary			
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.			

Policy HA5: Locally Listed Buildings

Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option:	Option 3: Include policy for Locally Listed Buildings. 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.		
Option 1: Do not include a policy relating to Locally Listed Buildings. 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 and Encourage active lifestyles	0 ? - 0 / 0 0 0 -	
Commentary			
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 Policy HA1. This option was ruled out due to the Local Plan approach for Policy HA1. This option would not give significant weight to any locally distinctive designations 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 and Encourage active lifestyles	0 ? + 0 / 0 0 0 +	
Commentary			
A policy relating to ASLC's, Locally Listed Buildings and Historic Parks and Gardens was considered as a way of reducing the number of policies in the Local 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 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 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure	0 ? ++ 0 / 0 0 0	

	9. Promote sustainable communities and Encourage active lifestyles	+	
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 HA6: Historic Parks and Gardens

Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option:	Option 3: Include policy for Historic Parks & Gardens. Option 3 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 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 and Encourage active lifestyles	0 ? - 0 0 - 0 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 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 and Encourage active lifestyles	0 ? + 0 / + 0 0 +	
Commentary A policy relating to ASLC's, Locally Listed Buildings and Historic Parks and Gardens was considered as a way of reducing the number of policies in the Local 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 these designations it would not have been effective enough.			
Option 3: Include policy for Historic Parks & Gardens.	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 and Encourage active lifestyles	0 0 ++ 0 / + 0 0 +	
Commentary 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. SA Objectives 7 and 8 are not relevant with regards to infrastructure provision and reducing car journeys. 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.

Policy HA7: Heritage Assets of Archaeological Interest			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option:	<p>Option 2: Include a policy covering both designated and non-designated archaeological heritage assets.</p> <p>As detailed below Options 2 and 3 are considered to involve broadly the same range of impacts on sustainability objectives. The merits of Option 2 over Option 3 relate more to the fact that the boundary between designated and non-designated archaeological heritage assets is less starkly drawn than in relation to standing structures and area-based designations. The NPPF thus gives some non-scheduled archaeological heritage assets equivalent protection to designated heritage assets. Moreover, there is the imperfect knowledge of archaeological assets, which can mean that assessments of significance can change during the course of the planning and development processes. Archaeology is thus considered to lend itself more to coherent treatment in the context of a single policy.</p>		
Option 1: Do not include a policy relating to archaeological heritage assets, relying instead on the overarching requirements of Policy HA1.	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 and Encourage active lifestyles	0 0 - 0 0 - 0 0 -	
	<p>Commentary</p> <p>In the absence of a policy specifically tailored to archaeological heritage assets there would be a risk of assets of this sensitive group being less fully considered as part of the planning process, with their protection against the impacts of development being less effective as a result. This would affect the landscape and health/wellbeing benefits associated with these assets as well as their beneficial role as part of the historic built environment. Other impacts of this option are considered neutral or uncertain.</p>		
Option 2: Include a policy covering both designated and non-designated archaeological heritage assets.	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 and Encourage active lifestyles	0 +? + 0 / + 0 0 +	
	<p>Commentary</p> <p>This type of asset is considered sufficiently distinctive to ensure that a policy dealing with archaeological heritage assets (both designated and non-designated) would have positive benefits in terms of the contribution which these assets can make as part of the built environment, as well as of their landscape/biodiversity benefits and health/wellbeing benefits. There may be additional climate change adaptation benefits in so far as many of Crawley's archaeological sites comprise soft landscape and drainage features such as moats.</p>		
Option 3: Include separate policies for designated and non-designated heritage assets.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes	0 +? + 0 /	

	5. Maintain/support employment		
	6. Conserve/enhance biodiversity and landscape	+	
	7. Promote sustainable journeys	0	
	8. Provide sufficient infrastructure	0	
	9. Promote sustainable communities and Encourage active lifestyles	+	
Commentary			
Treatment of designated and non-designated archaeological heritage assets in separate policies is considered to have similar impacts as the 'one policy' approach represented by Option 2, including a range of positive environmental and social benefits.			

Open Space, Sport & Recreation

Policy OS1: Open Space, Sport and Recreation			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	Option 1: Use the 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 and SA/SEA Objectives		
Option 1: Use the 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 and Encourage active lifestyles	+ + + + ++ + + + ++	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 allocated as part of the Local Plan.			
The council's Open Space Study (2020) 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.			
The Open Space review includes an analysis of indoor sport facility uses as well as a playing pitch strategy.			
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 and Encourage active lifestyles	+ + / - - / + + +	
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. SA Objectives 1 and 6 are met where types of open space that are themselves based around natural capital help sustain the local environment.			

Policy OS2: Provision of Open Space and Recreational Facilities			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	<p>Option 2: Requires that impacts of an increased population on open space are mitigated/compensated for through developer contributions or onsite provision and that s106 agreements can also be sought to secure the replacement of open space.</p> <p>Option 2 is most suitable as it aims to provide infrastructure to support the growth of the town through multiple means of securing financial contributions when needed.</p>		
Option 1: Requires that impacts of an increased population on open space are mitigated/compensated for through developer contributions 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 and Encourage active lifestyles	+ + + 0 / + / + +	
<p>Commentary</p> <p>This option aims to provide new open space where possible and enhance existing open space to mitigate the impact of an increasing population through developer contributions.</p> <p>Open Space can provide functions towards adaptation to climate change, through areas for surface water flooding, trees soaking up storm water and providing shading and cooling.</p>			
Option 2: Requires that impacts of an increased population on open space are mitigated/compensated for through developer contributions or onsite provision and that s106 agreements can also be sought to secure the replacement of open space.	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 and encourage active lifestyles	+ ++ + 0 / + + ++ ++	
<p>Commentary</p> <p>This option also includes s106 agreements as a method of securing the replacement of open space and improving the Public Rights of Way Network. Providing a positive impact to SA Objectives 1, 2, 3, 4, 6, 7, 8 and 9.</p> <p>SA Objective 5 has a neutral impact although the type of provision may increase opportunities for employment.</p>			
Option 3: Not to charge Developer contributions 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 and Encourage active lifestyles	0 0 0 + / 0 0 - -	
<p>Commentary</p> <p>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.</p>			

Policy OS3: Rights of Way and Access to the Countryside			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	Option 1: Maintain and enhance Public Rights of Way. The most suitable option is to maintain and enhance Public Rights of Way and improve access to the countryside as it has most positive impact on sustainability.		
Option 1: Maintain and enhance Public Rights of Way and improve access to 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 and Encourage active lifestyles	+ 0 + 0 0 + ++ + ++	
	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. It promotes the ability of green infrastructure to be incorporated into public bridleways supporting SA Objectives 3, 7 and 9 and can have a positive impact on minimising climate change by providing sustainable recreation routes close to and through the urban area and access to the countryside reducing the need for car journeys.		
Option 2: 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 and Encourage active lifestyles	0 0 + 0 0 / / / /	
	Commentary Relying on the NPPF creates uncertainty as there is little detail on how Public Rights of Way should be protected or identification of specific opportunities to enhance Public Rights of Way.		

Infrastructure Provision

Policy IN1: Infrastructure Provision			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	Option 1: A policy on Infrastructure Provision setting out in broad terms how development proposals will be assessed in respect of their infrastructure needs and their impact on existing infrastructure. Option 1 has been chosen as it is considered to give more support to 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 then there would be specific environmental issues as well as a poor quality of life. The retention and enhancement of social infrastructure facilities within the town also promote sustainable patterns of travel.		
Option 1: A policy on Infrastructure Provision setting out in broad terms how development proposals will be assessed in respect of their infrastructure needs and their impact	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 + + + ++	

on existing infrastructure.	9. Promote sustainable communities and Encourage active lifestyles	+	
	Commentary The main objective of this policy is to ensure that development meets its infrastructure needs through the use of existing infrastructure or new infrastructure where its need is generated by the new development. It is important that this is highlighted locally to maximise links to the Infrastructure Plan which sets out the provision of infrastructure in the town in more detail and to link to how the infrastructure is to be funded, including through developer contributions. Although there is a neutral effect on some sustainability objectives, policies elsewhere in the plan deal more effectively with these issues.		
Option 2: Do not introduce a local policy and rely on NPPF	1. Minimise climate change	-	
	2. Adapt to climate change	-	
	3. Protect/enhance built environment	0	
	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 and Encourage active lifestyles	--	
		-	
Commentary Relying solely on the NPPF means that the positive effects of this policy option compared to option one are diminished. Infrastructure provision is specific to each local area and it is important that these local links are maximised.			

Policy IN2: The Location and Provision of New Infrastructure

Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	Option 1: Locating new infrastructure in the most appropriate and/or accessible locations. There are significant benefits in locating development in the most accessible location as this will affect the length of journeys and how people travel to facilities like schools and health services (SA Objectives 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 plant 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 Objective 9 as it can help maximise the use of these facilities by less mobile sections of the population.		
Option 1: Include a policy requiring location of new infrastructure in the most appropriate and/or accessible locations.	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	+	
	7. Promote sustainable journeys	+	
	8. Provide sufficient infrastructure	+	
	9. Promote sustainable communities and Encourage active lifestyles	+	
Commentary Locating facilities in the most accessible locations will affect how people choose to travel to the facilities. The neighbourhood structure of the town also helps encourage the provision of facilities with a neighbourhood catchment within the neighbourhoods themselves. Maximising the number of people walking, cycling and using public transport can help reduce car journeys, pollution and the impact on climate change. The provision of facilities in accessible locations can maximise the use of health, sports and social facilities for people who do not have access to a private car. Therefore, this can contribute to SA Objective 9.			
Option 2: Do not include a policy regarding location of	1. Minimise climate change	-	
	2. Adapt to climate change	-	
	3. Protect/enhance built environment	/	

infrastructure and instead rely on the NPPF policies.	4. Decent, affordable homes	0	
	5. Maintain/support employment	-	
	6. Conserve/enhance biodiversity and landscape	-	
	7. Promote sustainable journeys	-	
	8. Provide sufficient infrastructure	-	
	9. Promote sustainable communities and Encourage active lifestyles	-	
Commentary			
Relying on the principles of the NPPF would make it harder for the Local Planning authority to ensure that infrastructure facilities are provided in the most appropriate or accessible locations, with an associated risk that less sustainable patterns of travel would arise, or that infrastructure facilities might be located in the vicinity of incompatible land uses.			

Policy IN3: Supporting High Quality Communications

Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	Option 1: A specific policy relating to the delivery of telecommunications. Option 1 is chosen as the more sustainable option, as a dedicated communications policy could have greater benefits than relying on a policy relating to the more general provision of infrastructure. It is important that developments have the ability to connect to gigabit capable full fibre broadband services and any other communications infrastructure that may be delivered in the future to maximise the benefits to both business and residents. Including a specific policy to support high quality communications will enable this to be planned into new development, avoiding the need to retrofit in future years.		
Option 1: A specific policy relating to the strategic delivery of telecommunications.	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 and Encourage active lifestyles	+ + + + + +? + ++ +	
Commentary			
Telecommunications are a basic everyday need and are essential to the realisation of a wide range of economic, social and environmental benefits. The provision of a dedicated communications policy will help to ensure that connectivity to this infrastructure is designed into development from the outset, helping to minimise disruption, costs and the use of resources to retrofit it into development.			
Option 2: Relying on the policies dealing with the general provision of infrastructure.	1. 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 and Encourage active lifestyles	+? +? +? +? +? ? +? +? +?	

Commentary

Telecommunications infrastructure would to some extent be covered by the main infrastructure policy which applies to a wide range of infrastructure, but without a dedicated policy there is risk that this type of infrastructure is not properly considered in the design of developments. Therefore, this option is unlikely to be as effective as a policy highlighting the requirements for designing for telecommunications infrastructure.

Economic Growth

Policy EC1: Sustainable Economic Growth

Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	<p>Option 3: Option 3: Adopt a spatial approach which recognises Crawley as a key sub-regional employment destination and plans positively to meet its economic growth needs within the borough. Apply an approach that supports the economic function of the designated main employment areas, maximising the use of land in these locations for economic development. Support delivery of new employment land through small extensions to Manor Royal where this would deliver business floorspace and the allocation of land at Gatwick Green as a Strategic Employment Location to accommodate Crawley's significant industrial and warehouse land requirements.</p>		
Option 1: Rely on the National Planning Policy Framework to ensure that identified economic growth is directed to the most appropriate and sustainable 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 communities and Encourage active lifestyles 	<p>?</p> <p>?</p> <p>?</p> <p>?</p> <p>?</p> <p>0</p> <p>0</p> <p>?</p>	
<p>Commentary:</p> <p>Based upon the Experian Baseline Job Growth projection, there is need for a minimum 26.2 hectares new employment land to accommodate business needs in Crawley Borough over the period to 2040. The identified need is significantly within the industrial sector (22.9ha), with office needs accounting for 3.3ha of the total. Crawley's Employment Land Trajectory (Base Date 31 March 2023) identifies an available employment land supply pipeline of 14.49 10.29ha, which comprises 5.3ha office land and 9.17 4.97ha industrial and storage & distribution land. The existing available office land supply meets identified quantitative office needs, and though there remains a broader qualitative office need, Crawley's employment land needs are substantially of an industrial nature (particularly B8 storage and distribution). With an existing available industrial and storage & distribution land supply pipeline of 9.17 4.97ha, there remains an outstanding need for a minimum 13.73 17.93ha new industrial and storage & distribution land. This remains broadly comparable with an industrial land requirement of at least 22.8ha (13.63 17.83ha shortfall) based on labour-supply forecasts, and 28.9ha (19.73 23.93ha shortfall) based on a continuation of past trends, the latter being a useful barometer of market demand.</p> <p>The Option 1 approach would rely on the NPPF to direct employment uses to the most appropriate and sustainable locations. However, the approach would not specifically seek to address Crawley's unmet industrial land needs, and reliance solely on the NPPF would not take account of the need for a holistic vision for economic growth in Crawley, particularly given its importance to the economic success of the wider sub-region. Without a locally-specific strategy in place, the economic growth requirements of the borough and the wider sub-region cannot be pro-actively planned for or accommodated. Crawley's constrained land supply position necessitates a clear economic vision and policy approach through the Local Plan to plan positively to meet Crawley's business land needs. Absence of a clear policy approach that identifies the level of employment growth required and directs this to the most appropriate locations creates uncertainty as to how employment 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</p>			

	function will be eroded by an insufficient supply of employment land and an inability to help address wider Coast to Capital and Gatwick Diamond objectives, potentially impacting negatively upon the growth within Crawley and the wider Gatwick Diamond.		
Option 2: Plan only for the level of need that can be accommodated within the existing main employment areas to maximise the limited available business land supply for employment uses. Work with neighbouring authorities to accommodate any unmet growth.	<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 and Encourage active lifestyles 	<p style="text-align: center;">+ + +? 0 - -? +? -? 0</p>	
	<p>Commentary: Based upon the Experian Baseline Job Growth projection, there is need for a minimum 26.2 hectares new employment land to accommodate business needs in Crawley Borough over the period to 2040. The identified need is significantly within the industrial sector (22.9ha), with office needs accounting for 3.3ha of the total. Crawley's Employment Land Trajectory (Base Date 31 March 2023) identifies an available employment land supply pipeline of 14.49 10.29ha, which comprises 5.3ha office land and 9.17 4.97ha industrial and storage & distribution land. The existing available office land supply meets identified quantitative office needs, and though there remains a broader qualitative office need, Crawley's employment land needs are substantially of an industrial nature (particularly B8 storage and distribution). With an existing available industrial and storage & distribution land supply pipeline of 9.17 4.97ha, there remains an outstanding need for a minimum 13.73 17.93ha new industrial and storage & distribution land. This remains broadly comparable with an industrial land requirement of at least 22.8ha (13.63 17.83ha shortfall) based on labour-supply forecasts, and 28.9ha (19.73 23.93ha shortfall) based on a continuation of past trends, the latter being a useful barometer of market demand.</p> <p>Under this option, Crawley's employment needs would be directed to the existing main employment areas, applying a supply-led approach to accommodate as much of the business land need as can be reasonably planned for within Crawley's existing main employment areas having regard to land supply constraints. The Local Plan would continue to protect the designated main employment areas as the focus for employment uses, supporting the intensification of existing employment sites and also appropriate small extensions to Manor Royal. However, there would remain an outstanding business land need of at least 13.63 17.83ha, and under this approach the council would need to work with neighbouring authorities to accommodate its unmet need in sustainable locations. The approach would therefore result in unmet business needs in Crawley over the Plan period.</p> <p>A significant concern with this approach is that although strategic employment allocations are planned elsewhere in the FEMA in Crawley's neighbouring districts/boroughs, these are each of particular typologies that would not meet the specific demand for new B8 storage & distribution focussed employment land. This includes the office-led Horley Strategic Business Park, Burgess Hill Science & Technology Park (research & innovation) and allocations in Horsham District (North Horsham and Novartis Site) which would accommodate smaller business spaces and start ups. Whilst these sites will all add to the overall economic strength of the Gatwick Diamond, they would not be meeting the storage & distribution needs of Crawley. This demand for storage & distribution floorspace is particularly focussed on the area given its proximity to Gatwick Airport and the strategic road network.</p> <p>Overall, there is risk that a failure to identify new land for a strategic employment location in Crawley would mean that locationally specific B8 storage & distribution needs would remain unmet. There is significant risk that application of a supply-led approach to economic growth that relies of Crawley's neighbours is not sufficiently pro-active, and does little to support the specific economic requirements of Crawley. Set against a wider need to support the continued economic recovery and diversification, and the direction of market signals, an approach of not identifying new land in Crawley would mean that business and investment is lost from Crawley and potentially from the functional economic market area. As such, there is significant risk that application of this approach fails to respond to NPPF requirements to plan positively for economic growth, may result in the undermining of Crawley's economic role, and that of the wider area.</p>		
Option 3: Adopt a spatial approach which recognises Crawley as	<ol style="list-style-type: none"> 1. To minimise climate change 2. To adapt to climate change 	<p style="text-align: center;">? ?</p>	It will be important to ensure that any new employment land coming forward as an extension

a key sub-regional employment destination and plans positively to meet its economic growth needs within the borough. Apply an approach that supports the economic function of the designated main employment areas, maximising the use of land in these locations for economic development. Support delivery of new employment land through small extensions to Manor Royal where this would deliver business floorspace and the allocation of land at Gatwick Green as a Strategic Employment Location to accommodate Crawley's significant industrial and warehouse land requirements.	3. Protect/enhance built environment	+	to Manor Royal appropriately mitigates impacts on biodiversity and landscape character. This would need to be demonstrated through the planning application process.
	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 and Encourage active lifestyles	++	
	<p>Commentary:</p> <p>Based upon the Experian Baseline Job Growth projection, there is need for a minimum 26.2 hectares new employment land to accommodate business needs in Crawley Borough over the period to 2040. The identified need is significantly within the industrial sector (22.9ha), with office needs accounting for 3.3ha of the total. Crawley's Employment Land Trajectory (Base Date 31 March 2023) identifies an available employment land supply pipeline of 14.49 10.29ha, which comprises 5.3ha office land and 9.17 4.97ha industrial and storage & distribution land. The existing available office land supply meets identified quantitative office needs, and though there remains a broader qualitative office need, Crawley's employment land needs are substantially of an industrial nature (particularly B8 storage and distribution). With an existing available industrial and storage & distribution land supply pipeline of 9.17 4.97ha, there remains an outstanding need for a minimum 13.73 17.93ha new industrial and storage & distribution land. This remains broadly comparable with an industrial land requirement of at least 22.8ha (13.63 17.83ha shortfall) based on labour-supply forecasts, and 28.9ha (19.73 23.93ha shortfall) based on a continuation of past trends, the latter being a useful barometer of market demand.</p> <p>Under Option 3, the Local Plan would plan positively for this level of economic growth within the borough through the identification opportunities for a minimum 13.63 17.83ha employment land. This will be achieved through an approach that protects and maximises use of the designated main employment areas for economic growth, including supporting the mixed-use business function of Manor Royal, allowing small scale extensions to Manor Royal where these can be accommodated outside of the safeguarded land, and commit to the identification and allocation of new employment land in the form of a Strategic Employment Location to meet Crawley's employment needs in full. In order to accommodate Crawley's economic needs in full, land to the East of Balcombe Road and South of the M23 Spur, known as Gatwick Green, is allocated for the comprehensive development of an industrial-led Strategic Employment Location of predominantly B8 storage and distribution use that will provide a minimum of 13.63 17.83ha new B8 industrial land (minimum 41,315 62,737sqm floorspace). This level of growth can most sustainably be located in Crawley, and Gatwick Green is the only site within the borough that is capable of providing the required quantum of growth on a comprehensive basis without prejudicing the possible delivery of a southern runway at Gatwick Airport should this be required by the government.</p> <p>Through applying the Option 3 approach, the Local Plan sets out a strategy that responds to economic growth requirements based upon the economic forecasting, market intelligence and sectoral analysis that is provided by the Experian Baseline. The Option 3 approach seeks to maximise the economic use of Crawley's existing main employment areas, support the growth of Manor Royal through small scale extensions for business land, and identification of a Strategic Employment Location at Gatwick Green to ensure Crawley's employment needs can be accommodated in full. In doing so, the approach will enable Crawley to respond to market signals, planning for the specific sectors where growth is identified, and support continued economic recovery from the Covid-19 pandemic. In identifying new business land, the approach will help to retain and attract business and investment, both to Crawley and the wider functional economic market area. In doing so, the approach responds to NPPF requirements to plan positively for economic growth, and reinforcing and strengthening Crawley's economic role, and that of the wider area.</p>		

Policy EC2: Economic Growth in Main Employment Areas			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	Option 2: Retain the adopted Local Plan 2015 approach, identifying and protecting the main employment areas for flexible economic growth, and setting out criteria that must be satisfied where a loss of employment land or floorspace is proposed.		
Option 1: Do not designate Main	1. To minimise climate change	-?	
	2. To adapt to climate change	-?	

<p>Employment Areas. Rely only on the National Planning Policy Framework to ensure that economic growth is directed to the most sustainable and appropriate locations.</p>	<ol style="list-style-type: none"> 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 and Encourage active lifestyles 	<p style="text-align: center;">0 -? -- -? ? -? 0</p>	
<p>Commentary: The Option 1 approach would rely solely on NPPF guidance relating to the economy. Planning policies are required to set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth. It highlights the need for policies to identify strategic sites and be flexible to address barriers to investment and meet needs not anticipated in the Plan. In this regard, there is concern that a reliance solely on the NPPF would not enable the Local Plan to have regard to the varied economic characteristics of the borough and its relationship with the Functional Economic Market Area. Option 1 would not set out a clear strategy based on locally-specific evidence, and without the formal designation of Main Employment Areas, sustainable economic growth in borough (and the wider sub-region) would not 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 would not represent a sound planning approach to delivering sustainable economic development. Without a clear local vision and designated employment sites, it is uncertain how economic growth could be directed to the most sustainable locations, or how the economic function of the borough and sub-region could be protected and enhanced without the designation of dedicated Main Employment Areas as a focus for economic growth. This could in turn result in employment land or buildings being lost to other uses, eroding the available land supply, undermining existing and new businesses by creating a climate of uncertainty for investors and land owners, and ignoring the planned nature of Crawley as a New Town. As such, the impacts of the approach in terms of climate change, car journey reduction, and promotion of sustainable communities is uncertain, though likely negative. Having regard to the above, Option 1 is not considered to represent the most sustainable approach to promoting economic growth, and is therefore dismissed.</p>			
<p>Option 2: Retain the adopted Local Plan 2015 approach, designating protecting the main employment areas for flexible economic growth, and setting out criteria that must be satisfied where a loss of employment land or floorspace is proposed.</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 and Encourage active lifestyles 	<p style="text-align: center;">+ + + + ++ + + + ++</p>	
<p>Commentary: Under Option 2, the Local Plan would retain its approach in designating main employment areas that are protected for employment use. The approach is flexible to support a range of economic growth across the main employment areas, whilst specifically prioritising Manor Royal for business and business related development. Any loss of employment land or floorspace would need to be justified against set criteria. Option 2 would enable the Local Plan to plan to proactively plan for the needs of business whilst setting out a clear economic vision and strategy for the area. The approach reflects NPPF requirements to identify strategic sites for investment, whilst remaining flexible to support a range of business-led economic growth. In this regard, the implementation of a locally and spatially specific policy approach that applies the guidance of the NPPF and steers economic growth at Crawley, is considered to represent a vital component of the Local Plan. In identifying a clear network of employment sites across the borough for economic growth, the approach should contribute towards the reduction of car journeys, and promotion of sustainable communities and minimisation/ adaptation to climate change, whilst promoting a strong employment provision 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</p>			

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 designated employment locations where economic growth is able to cluster and grow in a way that is not constrained by non-employment uses, true to the planned nature of Crawley as a New Town.

Policy EC3: Manor Royal			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	Option 1: Identify Manor Royal as the principal location for B use class business, with flexibility for non B use classes only where these complement and support its function as a business district. Draw upon the Manor Royal Design Guide SPD to achieve high quality landscaping design for key frontages and gateway sites.		
Option 1: Identify Manor Royal as the principal location for B use class business, with flexibility for non B use classes only where these complement and support its function as a business district. The policy will draw upon the Manor Royal Design Guide SPD to achieve high quality design and landscaping for key frontages and gateway 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.	0	
	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 and Encourage active lifestyles	+	
	<p>Commentary</p> <p>This Option would take the same approach as applied to Manor Royal in the 2015 Local Plan, protecting Manor Royal for B-class business and business-supporting uses. This reflects the evidence base recommendations of the Economic Growth Assessment that Manor Royal should serve as the principal destination for business uses. Option 1 draws upon the locally specific evidence base of the Economic Growth Assessment which identifies 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, Manor Royal represents the principal location for B Class employment uses, and other employment typologies where it can be demonstrated that these would support, and not undermine, the core 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 support the future growth of Manor Royal, building on its strengths and seeking to address identified weaknesses, to enable it to grow sustainably and respond to the challenge of its competitors. The approach will mean that Manor Royal's key business function is retained, whilst other employment uses that would support the business function, particularly those staff amenities that are currently lacking, are supported by the policy framework. The approach provides a mechanism for these uses to come forward in the form of a dedicated business hub.</p> <p>The approach also provides a policy hook for the Manor Royal Design Guide SPD, which is recognised as a key means of improving the overall Manor Royal environment, and for referring to the Manor Royal developer contribution requirement. 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, coupled with positive impacts against other indicators, mean that Option 1 is considered to represent the most sustainable approach.</p> <p>Enhancement of Manor Royal as a business location will not necessarily create a net impact on climate change, but sustainability benefits can be delivered through the identification of Manor Royal as an opportunity area for District Energy Network (Policy SDC2). The policy, through its design requirements and Manor Royal contribution, supports the introduction of new green landscaping helping to enhance adaptability of the estate to climate change (SA Objective 2), 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) through improving the overall sense of place at Manor Royal. 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 and active lifestyles (SA Objective 9).</p>		

<p>Option 2: Identify Manor Royal as a Main Employment Area but with no specific promotion of business focus, instead support a range of employment uses. No specific 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. 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 and Encourage active lifestyles 	<p>+? +? -- -? +? -? - 0 +?</p>	
<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, evidence identifies a clear demand for a significant amount of B Class employment land floorspace in Crawley over the plan period. With only a limited supply of employment land available, there is a need to build upon and reinforce Manor Royal’s function as a location for B Class employment uses in order to retain a supply of business land in what is the largest business district in the Gatwick Diamond. Were other employment uses that do not support the business function to be supported at Manor Royal in an unplanned way, there is risk this would erode the available business land supply and increase the overall level of need, whilst also undermining the business function of Manor Royal through the introduction of other uses. In doing so, there is risk that the approach would allow non-business facilities that are not of the scale and function required at Manor Royal, potentially undermining the status and function of Manor Royal as a business district, whilst also potentially detracting from the function of other Main Employment Areas, for example the Town Centre. Further, an approach that is not consistent 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. This approach would therefore fail to address the aesthetic and physical environment, identified as a key priority for Manor Royal, in a positive manner.</p> <p>A more managed approach to development at Manor Royal is therefore required, and 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 Manor Royal from an enhanced retail and leisure offering within it, but this would undoubtedly create new jobs, albeit not in a way that satisfies Crawley’s significant business land requirements, nor objectives to support the role of Manor Royal as a business district and the continued vitality and viability of the 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 Manor Royal (SA Objective 7). There will be an uncertain effect on infrastructure and this might be dependent on the form of development (SA Objective 8). There could be a positive impact on public health if leisure facilities are brought forward, though without appropriate policy in place, there would be no mechanism to ensure that these uses are appropriate to Manor Royal in their scale and function (SA Objective 9).</p>			
<p>Option 3: Identify Manor Royal as a location for employment, 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 quality design and landscaping for key frontages and gateway</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 and Encourage active lifestyles 	<p>+? +? + 0 -? +? -? ? 0 +?</p>	
<p>Commentary</p> <p>This approach would provide flexibility for a greater range of employment generating uses at Manor</p>			

sites.

Royal, as identified in the NPPF. However, evidence identifies a clear demand for a significant amount of B Class employment land floorspace in Crawley over the plan period. With only a limited supply of employment land available, there is a need to build upon and reinforce Manor Royal's function as a location for B Class employment uses in order to retain a supply of business land in what is the largest business district in the Gatwick Diamond. Were other employment uses that do not support the business function to be supported at Manor Royal in an unplanned way, there is risk this would erode the available business land supply and increase the overall level of need, whilst also undermining the business function of Manor Royal through the introduction of other uses. In doing so, there is risk that the approach would allow non-business facilities that are not of the scale and function required at Manor Royal, potentially undermining the status and function of Manor Royal as a business district, whilst also potentially detracting from the function of other Main Employment Areas, for example the Town Centre.

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 fundamentally undermined.

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, albeit not in a way that satisfies Crawley's significant business land requirements, nor objectives to support the role of Manor Royal as a business district and the continued vitality and viability of the 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, though without appropriate policy in place, there would be no mechanism to ensure that these uses are appropriate to Manor Royal in their scale and function (SA Objective 9). Therefore, it is considered that Manor Royal is faced with unique circumstances that justify a more managed approach to development, and Option 3 is not considered to represent the most sustainable way forward.

<p>Option 4: Identify Manor Royal as the principal location for B use class business, with flexibility for non B use classes only where these complement and support its function as a business district. No specific design standards</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 and Encourage active lifestyles 	<p>+? +? -- 0 ++ 0 + + +</p>	
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Commentary

This Option would take the same approach as applied to Manor Royal in the 2015 Local Plan, protecting Manor Royal for B-class business and business-supporting uses. This reflects the evidence base recommendations of the Economic Growth Assessment that Manor Royal should serve as the principal destination for business uses. Option 1 draws upon the locally specific evidence base of the Economic Growth Assessment which identifies 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, Manor Royal represents the principal location for B Class employment uses, and other employment typologies where it can be demonstrated that these would support, and not undermine, the core 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 support the future growth of Manor Royal, building on its strengths and seeking to address identified weaknesses, to enable it to grow sustainably and respond to the challenge of its competitors. The approach will mean that Manor Royal's key business function is retained, whilst other employment uses that would support the business function, particularly those staff amenities that are currently lacking, are supported by the policy framework. The approach provides a mechanism for these uses to come forward in the form of a dedicated business hub.

However, an approach that is not consistent 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. This approach would therefore fail to address the aesthetic and physical environment, identified as a key priority for Manor Royal, in a positive manner. Enhancement of Manor Royal as a business location will not necessarily create a net impact on climate change, but there sustainability benefits can be delivered through the identification of Manor Royal as an opportunity area for District Energy Network (Policy SDC2). The policy, through its design requirements and Manor Royal contribution, supports the introduction of new green landscaping helping to enhance adaptability of the estate to climate change (SA Objective 2), 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) through improving the overall sense of place at Manor Royal. 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 and active lifestyles (SA Objective 9).

Policy EC4: Strategic Employment Location

Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	<p>Option 2: Allocate an industrial-led Strategic Employment Location through a dedicated Local Plan policy that sets out site specific requirements for the site.</p> <p>This approach will enable detailed considerations relating to the allocation of a Strategic Employment Location to be considered in appropriate detail, ensuring that development has due regard to all material considerations and that it is sustainable.</p>		
Option 1: Allocate an industrial-led Strategic Employment Location only through Strategic Policy EC1	<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 and Encourage active lifestyles 	<p>-?</p> <p>-?</p> <p>-?</p> <p>0</p> <p>++</p> <p>-?</p> <p>-?</p> <p>-?</p> <p>-?</p> <p>-?</p>	
	<p>Commentary</p> <p>Local Plan Strategic Policy EC1 establishes the amount and type of employment land and floorspace that is required in Crawley over the Plan period, and sets out the strategy through which its delivery will be achieved; this being through protecting and maximising the efficient use of the existing designated main employment areas, and supporting the identification of new employment land, including a Strategic Employment Allocation. Whilst it is appropriate for Strategic Policy EC1 to identify a Strategic Employment Allocation as part of the Plan strategy through which Crawley’s employment needs will be met, site specific requirements must be set out to support the allocation and ensure that development is sustainably planned to deliver economic, environmental and social benefits. These requirements, whilst vital to ensuring the delivery of an exemplar and sustainable SEL, relate specifically to the allocation site and its surrounds, and such site-specific matters could not form part of a strategic policy. Therefore, whilst Strategic Policy EC1 is able to identify the allocation of an SEL as part of a wider strategy to support delivery of sustainable economic growth, it is not able to set out the detailed site specific policy requirements that can only be provided through a non-strategic policy.</p>		
Option 2: Allocate an industrial-led Strategic Employment Location through a dedicated Local Plan policy that sets out site specific requirements for the site.	<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 	<p>?</p> <p>++</p> <p>++</p> <p>++</p> <p>++</p> <p>++</p> <p>-</p>	<p>Objective 6: The proposed Gatwick Green SEL would be situated in a countryside location that is subject to environmental designations. It is possible that development could have a negative impact upon the landscape, and conservation of biodiversity habitats. However, through a dedicated allocation policy, the requirements for</p>

	<p>8. Ensure the provision of sufficient infrastructure</p> <p>9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles</p>	<p>+?</p> <p>+</p> <p>+?</p>	<p>development, including the need to conserve and enhance biodiversity habitats, can be set out to ensure that appropriate mitigation is provided.</p>
<p>Commentary</p> <p>Through this approach, Strategic Policy EC1 will continue to set out the amount and type of employment land and floorspace required in Crawley over the Plan period, making clear the strategy through which delivery of the required floorspace would be achieved; this being through protecting and maximising the efficient use of existing employment land, and supporting the identification of new employment land, including a Strategic Employment Allocation. A separate dedicated policy would then formally allocate the site, providing details of the site specific requirements and considerations that would need to be taken into account in a planning application. This is considered to represent a sustainable approach, as it requires detailed matters relating to the amount and type of business floorspace, transport access to the site, environmental considerations, character, setting and amenity, in addition to other material considerations, to be considered in the required level of detail through the allocation process and a subsequent planning application, ensuring that the development is sustainable. This represents a sustainable approach and is the chosen option.</p>			
<p>Option 3: Explore the scope to allocate an industrial-led Strategic Employment Location through an Area Action Plan.</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 and Encourage active lifestyles</p>	<p>?</p> <p>+?</p> <p>+?</p> <p>+?</p> <p>++?</p> <p>+?</p> <p>+?</p> <p>+?</p> <p>+?</p>	
<p>This option was consulted upon in draft form at the initial stage of Regulation 19 Local Plan consultation in January 2020. The approach would have committed to the preparation of a North Crawley Area Action Plan to explore how the currently safeguarded land could be utilised were safeguarding to no longer be required by national policy. It would have considered the requirement or otherwise to safeguard land to accommodate possible future growth at Gatwick Airport, the scope to accommodate a Strategic Employment Location(s), housing, infrastructure within the AAP area, as well as the scope for any environmental protections or designations. Since the initial Regulation 19 Local Plan consultation was undertaken in January 2020, guidance from the Planning Inspectorate with regard to the need for certainty regarding safeguarding in government policy means that it is considered that land at Gatwick is still required to be safeguarded for a potential future runway. Most of the sites promoted to the council for employment are located south of the airport, on safeguarded land that would potentially be required to accommodate the physical land-take needed for a southern runway. Employment development at these sites would prejudice the future delivery of a southern runway, were this to be required by the government. Therefore, this cannot be explored further through an Area Action Plan for allocation, as to do so would be contrary to national policy. For this reason, Option 3 cannot be explored further at this time. Land to the east of the airport is the only land previously safeguarded which the council considers, based on the information in the Gatwick Airport Masterplan which shows it as surface car parking, could be developed as a strategic employment site.</p>			

Policy EC5: Employment and Skills Development			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	Option 2: Pro-actively support the Crawley Employment and Skills Programme through a specific Local Plan policy.		

<p>Option 1: Do not provide a specific skills policy, relying on the Employment and Skills Programme to help address the skills gap.</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 and Encourage active lifestyles 	<p>+? +? 0 +? + 0 0 +? 0 +?</p>	
<p>Commentary</p> <p>Crawley's resident workforce has a lower than average level of Qualifications at NVQ4 and above (33.2%) when compared to the South East region (41.4%) Horsham (42.3%) and Mid Sussex (46.3%). This has resulted in fewer Crawley residents accessing the higher paid jobs, which are significantly taken up by people commuting in from outside the borough. Unemployment in Crawley has historically been low and the Local Universal Credit claimant count was at 2.8% in March 2020. This rose sharply during the Covid-19 pandemic, peaking at 8.9% in March 2021, reflecting the significant impacts felt by aviation-related employment sectors, but is now trending towards recovery with a claimant count of 4.41% in October 2022 3.74% in February 2023. There is a need to provide the support and training to enable residents to access new opportunities arising from economic diversification.</p> <p>Significant work to address the skills gap is being made through Crawley Employment and Skills Programme, though this relies significantly on developers voluntarily signing up to the Developer Charter. Without a dedicated Local Plan policy, this support would continue to operate on a purely voluntary basis, and would mean that the Local Plan is not pro-actively seeking to address barriers to investment as identified by the NPPF, nor would it be addressing the skills gap issues identified as a priority by Coastal to Capital LEP.</p>			
<p>Option 2: Pro-actively support the Crawley Employment and Skills Programme through a specific Local Plan 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 and Encourage active lifestyles 	<p>+ + + + ++ 0 + + 0 +</p>	
<p>Commentary</p> <p>Crawley's resident workforce has a lower than average level of Qualifications at NVQ4 and above (33.2%) when compared to the South East region (41.4%) Horsham (42.3%) and Mid Sussex (46.3%). This has resulted in fewer Crawley residents accessing the higher paid jobs, which are significantly taken up by people commuting in from outside the borough. Unemployment in Crawley has historically been low and the Local Universal Credit claimant count was at 2.8% in March 2020. This rose sharply during the Covid-19 pandemic, peaking at 8.9% in March 2021, reflecting the significant impacts felt by aviation-related employment sectors, but is now trending towards recovery with a claimant count of 3.74% in February 2023. Significant work to address the skills gap is being made through Crawley Employment and Skills Programme, though this relies significantly on developers voluntarily signing up to the Developer Charter. A dedicated policy would provide a planning mechanism to secure delivery of an employment and skills plan for qualifying developments, and a developer contribution towards the Employment and Skills Programme. This can play a positive role in supporting local people in accessing higher paid jobs, addressing the local skills gap and helping employers to recruit from a local employment base. The approach would mean that the Local Plan is positive and pro-active in seeking to address barriers to investment as identified by the NPPF, and would be pro-actively responding to the skills gap issue identified as a priority by Coastal to Capital LEP.</p>			

Policy EC6: High Quality Office Provision			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	Option 2: Include a new policy to support high quality office provision.		
Option 1: Do not include a policy to support office growth.	<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 and Encourage active lifestyles 	<p>0</p> <p>0</p> <p>0</p> <p>0</p> <p>+</p> <p>0</p> <p>0</p> <p>0</p> <p>0</p> <p>0</p>	
<p>Commentary</p> <p>The EGA recognises that Crawley’s office market is characterised by an over-supply of lower-grade accommodation that does not meet the demands of business, which is serving to frustrate the market. This lack of Grade A office stock has resulted in a qualitative supply issue that represents a challenge for the Northern West Sussex Functional Economic Market Area. Crawley’s existing available office land supply pipeline meets identified quantitative office needs, and the Horley Strategic Business Park site allocation in Reigate and Banstead borough will further add to the sub-regional offer, though there remains a broader qualitative office need in Crawley. Without a dedicated office policy, it is still possible that the market may seek to deliver new Grade A office space, and other Local Plan policies provide a mechanism to achieve this. However, the Local Plan would not be taking a pro-active in seeking to address specific barriers to investment, addressing weaknesses, or responding to future challenges as required by the NPPF.</p>			
Option 2: Include a new policy seeking to address the qualitative gap in office provision.	<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 and Encourage active lifestyles 	<p>+</p> <p>?</p> <p>+</p> <p>0</p> <p>++</p> <p>0</p> <p>0</p> <p>0</p> <p>+</p>	
<p>Commentary</p> <p>The EGA recognises that Crawley’s office market is characterised by an over-supply of lower-grade accommodation that does not meet the demands of business, which is serving to frustrate the market. This lack of Grade A office stock has resulted in a qualitative supply issue that represents a challenge for the Northern West Sussex Functional Economic Market Area. Crawley’s existing available office land supply pipeline meets identified quantitative office needs, and the Horley Strategic Business Park site allocation in Reigate and Banstead Borough will further add to the sub-regional offer, though there remains a broader qualitative office need in Crawley.</p> <p>The provision of a dedicated policy can support the delivery of Grade A office provision in Crawley, encouraging the refurbishment and improvement of existing stock and supporting new provision. A dedicated policy also presents an opportunity to remove the NPPF sequential test requirement, recognising the dedicated employment function of the main employment areas as an appropriate location for office use. The policy responds to the evidence of the EGA to take account of local circumstances and support economic growth in an area of the market that is currently frustrated. In doing so, the policy responds to NPPF objectives to tackle specific barriers to investment, address weaknesses, and respond to future challenges.</p>			

Policy EC7: Hotel and Visitor Accommodation			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	Option 2: Introduce a dedicated hotel and visitor accommodation policy that sets out locally specific planning guidance for such uses, including in the town centre, Manor Royal and Gatwick Airport. The policy also ensures consistency with Local Plan Policy GAT3, preventing the provision of airport-related parking in off-airport hotels and requiring on- airport hotels to comply with the requirements of Policy GAT3.		
Option 1: Not to include a specific policy relating to visitor accommodation	1. Minimise climate change	-	
	2. Adapt to climate change	-	
	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	--	
	9. Promote sustainable communities and Encourage active lifestyles	0	
	Commentary Hotel and visitor accommodation is an employment generating use, and is also identified in the NPPF as a main town centre uses, therefore being subject to the sequential test. In principle, the NPPF could guide applications for visitor accommodation to the most appropriate locations. However, this would not enable locally specific circumstances to be taken into account, in particular the recognition that Gatwick Airport also represents a sustainable location for hotel and visitor accommodation. Without a dedicated policy, the NPPF sequential test would need to be applied, even though there is an established hotel function within the airport boundary. A specific policy allows for the impact of a hotel proposal on the long-term operational needs of the airport to be assessed. Further, for consistency with Policy GAT3, it is important that airport-related parking is not allowed at off-airport hotels or locations, and is only allowed at on-airport hotels where justified by a demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport. This matter is addressed through Policy GAT3 but it is considered that a dedicated hotel and visitor accommodation policy adds further clarity.		
Option 2: Introduce a dedicated hotel and visitor accommodation policy to set out locally specific planning guidance for such uses, including in the town centre, Manor Royal and Gatwick Airport. The policy also ensures consistency with Policy GAT3, preventing the provision of airport-related parking in off-airport hotels and requiring on-airport hotels to comply with the requirements of Policy GAT3.	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 and Encourage active lifestyles	0	
	Commentary Hotel and visitor accommodation provides an important role in Crawley, both in creating jobs and in meeting the needs of business visitors, including those at Manor Royal, and people flying to/from Gatwick Airport. However, it is considered that a specific policy is needed to help guide the nature of hotel development in specific locations, including the appropriateness of the proposed location, the type of supporting facilities provided, and its approach to sustainable development, particularly where off-airport parking may be an issue. As hotel and visitor accommodation is identified in the NPPF as a main town centre uses, it is subject to the sequential test. However, in the case of hotels and visitor accommodation, Gatwick Airport represents a sustainable location for hotel and visitor accommodation, and there is an established hotel function within the airport boundary. Without a dedicated policy, these locally specific circumstances could not be taken into account, requiring applications for airport-focussed hotels to apply the sequential test. Further, for consistency with Policy GAT3, it is important that airport-related parking is not allowed at off-airport hotels or locations and is only allowed at on-airport hotels, where justified by a demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport. This matter is addressed through Policy GAT3, but it is considered that a dedicated hotel and visitor accommodation policy adds further clarity.		

	It is considered that a dedicated policy relating to hotels and visitor accommodation can better guide the planning application process, in particular through ensuring consistency with Policies EC3 and GAT3, and is considered to represent the most sustainable option. In sustainable locations such as the town centre, hotels can accommodate guests using the airport without the need for them to drive at all.		
Option 3: Include the Visitor Accommodation policy but without the restriction on off-airport parking at off-airport hotels.	<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 and Encourage active lifestyles 	<p>--</p> <p>--</p> <p>0</p> <p>0</p> <p>+</p> <p>0</p> <p>--</p> <p>0</p> <p>0</p>	
<p>Commentary:</p> <p>This approach would provide a dedicated visitor accommodation policy, though would not include text relating to matters of off-airport parking. Whilst this approach would provide a policy framework where visitor accommodation is proposed, it does not cross-reference as clearly with other Local Plan policies as is the case for Option 2. Specifically, in relation to airport parking, on-airport is the most sustainable location for airport-related parking. Sites within the airport boundary are close to the terminals, minimising the length of trips. The airport operator is responsible for meeting modal split targets for public transport, in the context of a sustainable surface access strategy to the airport, and parking forms an important part of this. To allow airport-related parking at off-airport hotels would undermine this approach, and would not be consistent with Policy GAT3. Off-airport hotels in sustainable locations such as the town centre can accommodate guests using the airport without the need for them to drive at all.</p>			

Policy EC8: Evening and Night-Time Economy			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	Option 2: Support the evening and night-time economy through a specific Local Plan policy.		
Option 1: Do not include a specific policy relating to the night time economy	<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 and Encourage active lifestyles 	<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>0</p> <p>0</p>	
<p>Commentary</p> <p>To support town centre vitality and viability, it is desirable to encourage a range of main town centre uses, including those that support activity during the daytime and evenings. The Town Centre policies of the Local Plan support a range of main town centre uses, including those that would fall within the bracket of evening and night-time economy. This approach would therefore not include a dedicated evening and night-time economy policy, instead relying on other Town Centre policies to support this type of use. A key issue with this approach it that it is not pro-active in encouraging these uses, when a positive approach could support the overall vibrancy of the Town Centre. Equally, it is possible that evening and night-time economy uses may be desirable in other parts of town, and this would not be explicitly picked up under other policies.</p>			
Option 2: Support the evening and night-time economy through a specific Local Plan 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 	<p>0</p> <p>0</p> <p>0</p> <p>0</p> <p>+</p> <p>0</p> <p>+?</p> <p>0</p>	

	9. Promote sustainable communities and Encourage active lifestyles	0	
<p>Commentary</p> <p>The addition of a specific evening and night-time economy policy can more pro-actively support the vitality and viability of Crawley Town Centre, including through helping to meet the needs of its growing residential population. It also can help to support appropriate development that provides an evening offer in other identified locations, for example Manor Royal or the neighbourhood centres. The approach also gives the Plan an opportunity to cross reference to relevant amenity policies, for example those relating to noise.</p>			

Policy EC9: Supporting the Creative Industries			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	Option 2: Support the Creative Industries in Crawley through a specific policy.		
Option 1: Do not identify a specific Creative Industries policy, instead relying on the wider Local Plan economy and Town Centre policies to support these uses.	<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 and Encourage active lifestyles 	<p>0</p> <p>0</p> <p>0</p> <p>0</p> <p>+</p> <p>0</p> <p>0</p> <p>0</p> <p>+</p>	
<p>Commentary</p> <p>Through its Gatwick 360 Strategic Economic Plan, the Coast to Capital LEP identifies the creative industries sector as a key competitive advantage for the area. The LEP recognises that growth in this sector is taking place not just in the traditional hubs of Brighton and Croydon, but also in the towns surrounding Gatwick Airport. The LEP objective is to create the economic conditions for innovation to flourish. From a Local Plan perspective, it is recognised that the uses falling within the Creative Industries sector are largely employment generating, and many fall within the B-use classes, so would be supported by the Local Plan economic policies. This option would therefore seek to rely on those other policies rather than adding a dedicated policy. This approach, whilst still supportive of the creative industries in a general sense, is not pro-active in planning for what is identified by the LEP as a priority issue. As such, this is not the most sustainable option.</p>			
Option 2: Support the Creative Industries in Crawley through a specific 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 and Encourage active lifestyles 	<p>0</p> <p>0</p> <p>0</p> <p>0</p> <p>++</p> <p>0</p> <p>0</p> <p>0</p> <p>+</p>	
<p>Commentary</p> <p>Gatwick 360 Strategic Economic Plan, the Coast to Capital LEP identifies the creative industries sector as a key competitive advantage for the area. The LEP recognises that growth in this sector is taking place not just in the traditional hubs of Brighton and Croydon, but also in the towns surrounding Gatwick Airport. The LEP objective is to create the economic conditions for innovation to flourish. From a Local Plan perspective, it is recognised that the typologies falling within the Creative Industries sector are largely employment generating, and many fall within the B-use classes, so would be supported by other Local Plan policies. However, a dedicated policy can more explicitly support the creative industries locally, helping to support the LEP objectives.</p>			

Policy EC10: Flexible Temporary Art and Creative Uses			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option:	Option 1: Include a policy to support the temporary use of buildings and spaces for creative uses.		
Option 1: Include a policy to support the temporary use of buildings and spaces for creative uses.	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 and Encourage active lifestyles	0 0 + 0 + 0 0 0 +	
Commentary It is recognised that Crawley Town Centre in particular contains a number of vacant buildings or space, which could be brought into beneficial temporary use to support the creative industries, for example through pop up stores or markets. Including a policy in the Local Plan can play an active role in encouraging this approach, helping to introduce vitality and vibrancy to under-used sites, supporting employment within the creative industries, and promoting an overall sense of vibrancy.			
Option 2: Do not include a policy on flexible temporary art and creative uses.	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 and Encourage active lifestyles	0 0 ? 0 ? 0 0 0 +?	
Commentary This approach would rely on the other economic and town centre policies, so would not specifically encourage or discourage the temporary use of vacant buildings or space. This is not to say that such uses would not come forward, but the Local Plan would not be pro-actively supporting these uses. It is considered therefore that Option 1 represents the more sustainable approach.			

Policy EC11: Employment Development and Amenity Sensitive Uses			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	Option 1: Retain and update a dedicated Local Plan policy to manage the relationship between employment and residential uses.		
Option 1: Retain and update a dedicated Local Plan policy to manage the relationship between employment and residential uses.	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 and Encourage active lifestyles	0 0 ++ ++ ++ 0 ? ? +	
Commentary This approach retains the principle of the Buffer Areas where designated Main Employment Areas are situated in proximity to existing residential properties, whilst seeking to ensure that the economic function of the Main Employment Areas is not constrained by inappropriate residential development. 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 manage the relationship between employment and housing, so as to protect the amenity of adjacent residential areas whilst ensuring that the economic function of the Main Employment Area is not undermined by inappropriate residential development. This maintains consistency with the NPPF, PPG (particularly its agent of change principle), Economic Growth Assessment, and other Local Plan policies and 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 enables buffer zones adjacent to Main Employment Areas to be retained. A dedicated policy enables the relationship in amenity terms, between residential and employment uses, to be appropriately managed through the Local Plan, thereby promoting sustainable development.		
Option 2: No policy in the Local Plan and rely on NPPF and Local Plan noise and general amenity policies.	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 and encourage active lifestyles	-?	
	Commentary An approach relying on the NPPF and other Local Plan policies would likely be manageable, but this fails to acknowledge the close proximity of some Main Employment Areas to existing residential locations, where the buffer zones provide an important opportunity to manage the transition between the two different use types. 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.		

Policy EC12: Neighbourhood Centres			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	Option 2: Moderate Flexibility is the chosen policy approach.		
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.	0	
	7. Reduce car journeys	-	
	8. Ensure the provision of sufficient infrastructure	-	
	9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	0	
	Commentary This option would involve implementation of a percentage based approach that 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, though other uses that would support a local shopping trip will also be considered. 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, often 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.		

	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 SA Objectives 1, 2, 5, 7, 8, and 9. Local Plan Policies may help mitigate against some negative impacts. However, an approach that potentially harms the parades would be difficult to mitigate against in full.		
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 and Encourage active lifestyles	+ + ++ ? + 0 ++ ++ ++	
Commentary This option would retain an approach similar to that employed in the adopted 2015 Local Plan. 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. 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. Therefore, Option 2 is considered to represent the most sustainable approach.			
Option 3: High Flexibility: Implement a highly flexible approach with minimal policy restriction.	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 and Encourage active lifestyles	- - ? ? -? 0 - - - 0	
Commentary 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 this option affords too great a level of flexibility, and in failing 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. 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.			

Policy EC13: Rural Economy			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	Option 1: Support the rural economy where it is in keeping with the landscape character of its location and does not undermine the intrinsic character and beauty of the countryside.		
Option 1: Support the rural economy where it is in keeping with the landscape character of its location and does not undermine the intrinsic character and beauty of the countryside.	1. To minimise climate change	+	Negative impact against Objective 6 may potentially be mitigated through locating rural economic development as close to built up areas as is practicable.
	2. To adapt to climate change	0	
	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	0	
	9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	+	
	0		
Commentary This approach seeks to support the NPPF recognition that rural businesses should be allowed to grow where this can be achieved in a manner that is sustainable and appropriate to the countryside setting.			
Option 2: Encourage the rural economy, regardless of landscape character and use.	1. To minimise climate change	-	
	2. To adapt to climate change	-	
	3. Protect/ enhance built environment	0	
	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 and Encourage active lifestyles	0	
	-		
Commentary This policy approach would support rural businesses, though is likely to have a significant negative impact upon the intrinsic character and beauty of the countryside, potentially undermining it through an urbanising impact. Such growth would be contrary to the NPPF and is not the most sustainable policy approach.			

Gatwick Airport

Policy GAT1: Development of the Airport with a Single Runway			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	Option 1: Development of the Airport with a Single Runway. The growth of the airport to cater for additional passengers within its current two terminal, one runway configuration can have a significant impact on a range of sustainability objectives including those relating to pollution, climate change, surface access, but also the social and economic objectives through benefits to the local economy. The policy identifies the need for environmental and infrastructure mitigation to be in place alongside growth at the airport within a defined boundary to appropriately support its operation. This is achieved through the policy, conditions on planning applications and the S106 Agreement between CBC/WSCC/GAL 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, biodiversity and other environmental matters. Without the control of this policy and the associated S106 agreement the environmental impacts could be much greater, and less benefits could be secured. Overall, the policy seeks to support the growth of the airport in its current configuration, and sets out that mitigation will be required where planning permission is needed. The policy also highlights the issues the council would expect to be addressed if GAL creates additional runway capacity at the Airport such as through the use of the northern runway.		
Option 1: Support the	1. Minimise climate change	-?	Section 106 Agreement with the airport

growth of the airport as a single runway, two terminal airport provided that environmental impacts are minimised and mitigated, infrastructure is provided and benefits to the local area are maximised.	2. Adapt to climate change	?	operator which sets out obligations relating to mitigating the environmental impact of the airport.
	3. Protect/enhance built environment	0	
4. Decent, affordable homes			
5. Maintain/support employment	0		
6. Conserve/enhance biodiversity and landscape	++ +?		
7. Promote sustainable journeys			
8. Provide sufficient infrastructure	+?		
9. Promote sustainable communities and Encourage active lifestyles	+? 0		
Commentary The operation of an international airport will invariably have a negative impact on the environment as air travel and surface access cause pollution. However, the airport does make a significant contribution to the employment base in the borough. The policy and S106 Agreement will help ensure that environmental impacts are minimised, and mitigated if necessary, and that significant harm to biodiversity is avoided 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. The Policy also defines an airport policy boundary, within which the council supports the development of facilities which contribute to the sustainable growth of Gatwick Airport subject to minimising and mitigating environmental impacts, providing infrastructure and maximising benefits to the local area. This is drawn tightly around the airport to encourage the best use of airport land and to protect the countryside beyond the airport.			
Option 2: Assess applications against general planning policies.	1. Minimise climate change	--	S106 would remain in place without a dedicated policy, but referring to the legal agreement in policy is helpful.
	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	/		
7. Promote sustainable journeys	-		
8. Provide sufficient infrastructure	+		
9. Promote sustainable communities and Encourage active lifestyles	0		
Commentary The alternative to assessing applications against a specific Gatwick policy is to rely on general planning policies elsewhere in the Plan. This could mean that the growth of the airport has a greater environmental impact by not allowing the specific environmental issues surrounding the growth of the airport to be fully considered. Through having a specific Gatwick Airport related policy in place, the impacts of airport growth, where planning permission is required, can be better mitigated.			
Option 3: Use Gatwick Airport Master Plan 2019 boundary as the policy boundary	1. Minimise climate change	-?	Section 106 Agreement would remain in place with the airport operator which sets out obligations relating to mitigating the environmental impact of the airport.
	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	--		
7. Promote sustainable journeys	-?		
8. Provide sufficient infrastructure	+?		
9. Promote sustainable communities and Encourage active lifestyles	0		
Commentary Para 2.3.6 of the Gatwick Airport Master Plan 2019 recommends that authorities wanting to illustrate the perimeter of the airport use the boundary represented in the Master Plan. However, this includes land which GAL owns/manages which is currently outside the adopted Local Plan Airport policy Boundary, some of which is countryside land with biodiversity designations. Including this land within the airport boundary would provide it with a more lenient policy position for uses which support the growth of the airport, including airport related parking, which would otherwise not be supported in			

these locations. This would have a negative impact on the natural environment and potentially other indicators such as sustainable journeys and therefore climate change.

Policy GAT2: Safeguarded Land			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	<p>Option 3: Safeguard land for future runway growth with an amended boundary to allow for strategic employment provision.</p> <p>This approach, which retains safeguarding with an amended boundary to allow strategic employment provision, is considered to represent the most sustainable option. It responds to national policy through retaining safeguarding, doing so with an amended boundary that will enable Crawley's significant employment land needs to be met through allocation of a Strategic Employment Location east of the airport at Gatwick Green, whilst ensuring that land to the south of Gatwick Airport, which would be required to accommodate the physical land take of a possible future runway and its operations, remains safeguarded.</p>		
Option 1: Safeguard land as shown in the Gatwick Airport Master Plan for future runway growth.	<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 and Encourage active lifestyles 	<p>? ? ? 0 ? -- ? ? - 0</p>	
	<p>Commentary</p> <p>The Aviation Policy Framework 2013 states that land outside existing airports that may be required for airport development in the future needs to be safeguarded until the government has established its policy in response to the findings of the Airport Commission. The government published the Airports National Policy Statement (ANPS) in June 2018 which set out the government's decision to support a third runway at Heathrow. The 'Making the Best Use of Existing Runways' government policy statement also published in June 2018 also referred to the Heathrow decision and provided policy relating to all other airports, supporting the expansion of capacity on their existing runways. However, the draft national Aviation Strategy, Aviation 2050, which was published in December 2018 after the ANPS was published, states it would be prudent to continue with a safeguarding policy at other airports to maintain a supply of land for future national requirements. This document has not yet been progressed further. The National Infrastructure Commission in 2021 concluded that its Second Assessment due in 2023 would not consider airport capacity because future demand and the approach to expanding runway capacity in the south east is currently unclear. The most recent Government policy document, Flightpath to the Future 2022 refers to the ANPS and Beyond the Horizon as the most up to date policy on planning for airport development. These documents in turn refer back to the Aviation Policy Framework 2013. There is not, therefore, any certainty in government policy that land at Gatwick is no longer required to be safeguarded. This means that it is considered land at Gatwick is still required to be safeguarded for a potential future runway, as the Local Plan must be consistent with national policy.</p> <p>This option would continue to safeguard land that is significantly to the east and south of the airport, based on the updated boundary shown within the Gatwick Airport Master Plan. 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. The key impact is that much needed employment land would continue to be unavailable should safeguarding be retained and amended to reflect GAL's Master Plan. A continuation of safeguarding on this basis could also impact on the delivery of other infrastructure, for example a multi-modal transport corridor serving potential future development to the west of Crawley. As the policy is not allocating land for a further runway, but rather safeguarding land for a potential runway, the assessment is not based on that of the impact associated with further runway growth in the safeguarded land. It is considered that whilst national policy requires that safeguarding is retained, to do so on the basis of the land take shown in GAL's Master Plan does not represent a sustainable approach given Crawley's significant employment land and infrastructure needs.</p>		
Option 2: Delete Policy	<ol style="list-style-type: none"> 1. Minimise climate change 2. Adapt to climate change 	-	

(do not safeguard land)	3. Protect/enhance built environment	-0	
	4. Decent, affordable homes	+	
5. Maintain/support employment	0		
6. Conserve/enhance biodiversity and landscape	++		
7. Promote sustainable journeys	--		
8. Provide sufficient Infrastructure	-		
9. Promote sustainable communities and Encourage active lifestyles	++		
	+0		
Commentary			
<p>This option was consulted upon in draft form at the initial stage of Regulation 19 Local Plan consultation. The approach would have committed to the preparation of a North Crawley Area Action Plan (AAP) to explore how the currently safeguarded land could be utilised were safeguarding to no longer be required by national policy. It would have considered the requirement or otherwise to safeguard land to accommodate possible future growth at Gatwick Airport, the scope to accommodate a Strategic Employment Location(s), housing, infrastructure within the AAP area, as well as the scope for any environmental protections or designations. Since the initial Regulation 19 Local Plan consultation was undertaken in January 2020, guidance from the Planning Inspectorate with regard to the need for certainty regarding safeguarding in government policy means that it is considered that land at Gatwick is still required to be safeguarded for a potential future runway, as the Local Plan must be consistent with national policy. For these reasons, Option 2 cannot be pursued.</p>			
Option 3: Safeguard land for future runway growth with an amended boundary to allow for strategic employment provision.	1. Minimise climate change	+?	<p>This approach would enable Crawley's employment needs to be met without prejudicing the delivery of a new runway at Gatwick Airport should a government decision find that this is required. The principle of retaining safeguarding with an amended boundary does potentially result in some potentially negative impacts, in that a Strategic Employment Location would likely impact upon the landscape, and mitigation would be required through careful master planning to offset this.</p> <p>Aviation Policy Framework 2013 states that land outside existing airports that may be required for airport development in the future needs to be safeguarded until the government has established its policy in response to the findings of the Airport Commission. The government published the Airports National Policy Statement (ANPS) in June 2018 which set out the government's decision to support a third runway at Heathrow. The 'Making the Best Use of Existing Runways' government policy statement also published in June 2018 also referred to the Heathrow decision and provided policy relating to all other airports, supporting the expansion of capacity on their existing runways. However, the draft national Aviation Strategy, Aviation 2050, which was published in December 2018 after the ANPS was published, states it would be prudent to continue with a safeguarding policy at other airports to maintain a supply of land for future national requirements. This document has not yet been progressed further. The National Infrastructure Commission in 2021 concluded that its Second Assessment due in 2023 would not consider airport capacity because future demand and the approach to expanding runway capacity in the south east is currently unclear. The most recent Government policy document, Flightpath to the Future 2022 refers to the ANPS and Beyond the Horizon as the most up to date policy on planning for airport development. These documents in turn refer back to the Aviation Policy Framework 2013. There is not, therefore, any certainty in government policy that land at Gatwick is no longer required to be safeguarded. This means that it is considered land at Gatwick is still required to be safeguarded for a potential future runway, as the Local Plan must be consistent with national policy.</p> <p>Most of the sites promoted to the council to be considered for employment use are located south of the airport, on safeguarded land that would potentially be required to accommodate the physical land-take needed for a southern runway. Employment development at these sites would prejudice the future delivery of a southern runway, were this to be required by the Government, and cannot therefore be explored further, as to do so would be contrary to national policy. Land to the east of Balcombe Road and south of the M23 spur, referred to as Gatwick Green, has also been promoted to the council for employment use through the 'call for sites'. The 44ha site is located east of Gatwick Airport, on land identified by the Gatwick Airport Master Plan for safeguarding. However, unlike the</p>
	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 and Encourage active lifestyles	+	
		+?	

other employment sites that have been promoted within the safeguarded area, land at Gatwick Green does not form part of the land take that would be required to accommodate a southern runway, and is shown in the Gatwick Airport Master Plan as being utilised predominantly for a large area of surface car parking. The council does not consider parking to represent an efficient use of the site, particularly given the significant employment needs of Crawley borough, and is of the view that the airport could accommodate parking more efficiently through decked and robotic parking and other efficiency measures, should it be demonstrated that additional on-airport parking is required having regard to the airport's surface access obligations stated in the S106 legal agreement. This approach, which retains safeguarding with an amended boundary to allow strategic employment provision, is considered to represent the most sustainable option.

Policy GAT3: Gatwick Airport Related Parking			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	<p>Option 1: Provision of additional or replacement airport-related parking only where it is (i) located within the airport boundary and (ii) it is justified by a demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport.</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. It is recognised that there are negative environmental impacts associated with car journeys being made, and this policy seeks to ensure (as required by the S106 legal agreement) that the volume of car parking is commensurate with the achievement of the public transport target for passenger journeys. The Gatwick Airport Surface Access Strategy sets out how the airport seeks to maintain and subsequently increase the proportion of passengers using public transport. The provision of additional car parking on airport minimises the distance travelled by the vehicle and the passenger in travelling between the car park and the airport terminals. This is therefore considered to have a lesser impact than additional sites for car parking which are located further away from the airport. This position has been endorsed through a series of planning inquiries.</p>		
Option 1: Provision of additional or replacement airport-related car parking will only be permitted where it is (i) located within the airport boundary and (ii) it is justified by a demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport within the airport boundary.	<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 and Encourage active lifestyles 	<p>-</p> <p>-</p> <p>0</p> <p>0</p> <p>/</p> <p>-?</p> <p>-</p> <p>/</p> <p>0</p>	<p>Section 106 agreement with the airport operator which sets out obligations relating to mitigating the environmental impact of the airport, including the provision of sufficient but no more on-airport car parking spaces than necessary to achieve a combined on and off airport supply that is proportionate to 48% of non-transfer passengers choosing to use public transport for their journeys to and from the airport.</p>
	<p>Commentary</p> <p>The provision of airport car parking generates car journeys and trips which have a negative impact on sustainability objectives relating to the promotion of sustainable journeys and on the minimisation of and adaptation to climate change. It is recognised, however, that a proportion of non-transfer passengers will choose to access the airport by private car. However, this must be balanced with obligations set out in the 2022 S106 legal agreement, including the requirement to provide 'sufficient but no more on-airport car parking spaces than necessary to achieve a combined on and off airport supply that is proportionate to 48% of non-transfer passengers choosing to use public transport for their journeys to and from the airport by end of 2024'.</p> <p>The policy approach therefore seeks to ensure that any growth of airport-related car parking provision is located on-airport (within the airport boundary) and is clear that it will be permitted only where it is justified based on demonstrable need in the context of the overall strategy for increasing the proportion of non-transfer passengers using public transport. Ensuring that airport parking is provided on-airport minimises the number of trips and distance travelled by the vehicle and the passenger in travelling between the car park and the airport terminals, and allows it to be taken account of in the airport operator's Surface Access Strategy promoting more sustainable access to the airport.</p> <p>Provision of new airport-related parking on-airport, depending upon its location, can detract from biodiversity and landscaping, frequently requiring significant hardstanding and lighting It therefore needs to be carefully and efficiently planned.</p> <p>The Option 1 approach has been endorsed by the Planning Inspector in finding sound the Local Plan 2015, where the Inspector observed that Policy GAT3 'requires all new parking to be provided within the airport boundary, on the basis that this is the most sustainable location' finding there to be</p>		

	<p><i>'obvious logic to the argument that car parks close to the terminals will minimise the length of car journeys for most people, and that on-airport provision is therefore a more sustainable option'</i>. The Local Plan approach has subsequently been successfully defended at the High Court, and at three separate planning inquiries relating to proposals for off-airport car parking. It is considered that Option 1 therefore represents the more sustainable approach.</p>		
Option 2: Provision of additional or replacement airport-related car parking within the airport boundary and at locations outside of the airport boundary provided it is justified by a demonstrable need	<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 and Encourage active lifestyles 	<p>--</p> <p>--</p> <p>0</p> <p>0</p> <p>/</p> <p>/?</p> <p>--</p> <p>/</p> <p>0</p>	
<p>Commentary</p> <p>The alternative option considered was to allow on and off-airport parking provision for airport-related parking where it is justified by a demonstrable need. The previous published iteration of the SA/SEA (Draft Report for the Submission Local Plan January 2020) did not include on-airport provision in this alternative option but this has been added to clarify on-airport provision would also be considered appropriate. In this alternative, proposals in on or off airport locations would have to be justified by demonstrable need. It is considered that an approach that allows airport-related parking in off-airport locations is likely to encourage users to access Gatwick Airport by car and would increase the number of trips and distance travelled by the vehicle, and passenger travelling between the car park and the terminals. The approach would also undermine the ability of the airport operator to meet obligations set out in the S106 legal agreement, including the requirement to provide 'sufficient but no more on-airport car parking spaces than necessary to achieve a combined on and off airport supply that is proportionate to 48% of non-transfer passengers choosing to use public transport for their journeys to and from the airport by 2024'. Further, the provision of airport-related parking in off-airport locations can detract from biodiversity and landscaping, frequently requiring significant hardstanding and lighting, and places pressure on land which could be more beneficially used for other uses.</p> <p>Option 2 is therefore considered to be less sustainable than the Option 1 approach. It would result in increased trip generation and longer journeys between car park and the terminals, would undermine the ability to achieve the 48% public transport target, and potentially result in wider negative sustainability impacts.</p> <p>It should be noted that, whilst airport-related parking on and off airport operates in various different ways, including Meet and Greet, and Park and Ride, only two fundamental options have been assessed in this SA/SEA. These relate to an assessment of the sustainability of airport-related parking being permitted in on-airport or in on and off-airport locations. This has position has been accepted at the High Court, where Mr Justice Collins ruled against the quashing of Local Plan 2015 Policy GAT3, finding that on-airport and off-airport represent the two alternatives that should be considered. In doing so, Mr Justice Collins accepted the arguments put forward by the council's QC, that there is not a requirement to go into "sub-plans", that is to say to identify distinctions to be drawn within the ambit of the alternative.</p>			

Policy GAT4: Employment Uses at Gatwick			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	<p>Option 1:</p> <p>The direct impact of the use of office floorspace at the airport is similar whether it is used for an airport related use or not. However, there could be an additional environmental impact if additional office provision had to be made in the future to meet the needs of uses that required an on airport location for operational reasons.</p> <p>Therefore, in the long term it is considered appropriate to assess the need for floorspace on a case by case basis as the most sustainable option. This enables a view to be taken as to whether the available floorspace is needed to support the growth of the airport.</p>		
Option 1: Assessing the impact of the loss of floorspace.	<ol style="list-style-type: none"> 1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 	<p>0</p> <p>0</p> <p>0</p> <p>0</p>	

	5. Maintain/support employment	+	
	6. Conserve/enhance biodiversity and landscape	0	
	7. Promote sustainable journeys	+	
	8. Provide sufficient infrastructure	0	
	9. Promote sustainable communities and 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 that additional new or replacement office floorspace is required 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 and impact.	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	+	
		?	
	7. Promote sustainable journeys	+	
	8. Provide sufficient infrastructure	0	
	9. Promote sustainable communities and 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.			

Crawley Town Centre

Policy TC1: Primary Shopping Area			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	Option 2: Managed Primary Frontage flexibility, fully flexible Secondary Frontage		
Option 1: Fully Flexible Frontages	1. To minimise climate change	0	
	2. To adapt to climate change	0	
	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	0	
	8. Ensure the provision of sufficient infrastructure	?+	
	9. Healthy, active, cohesive and socially sustainable communities and encourage active lifestyles	+?	
Commentary			
This option would retain the flexible approach of the secondary frontage, but could seek to potentially increase flexibility within the primary frontage. There is risk that such flexibility would potentially erode the function of the Primary Shopping Area, which despite the challenges facing the retail sector, retains a strong retail presence. Equally, the adopted Local Plan 2015 approach retains an element of control over the type of uses locating in the Primary Frontage, helping to ensure that town centre vitality and viability is encouraged. A loosening of this approach could result in an incursion of other uses, for example takeaways, which are frequently closed during the day, resulting in closed/inactive frontages. Such an approach would not fit with the overarching objectives of the NPPF, and Option 1 is not therefore considered to represent the most sustainable			

	policy approach.		
Option 2: Managed Primary Frontage Flexibility, Fully Flexible Secondary Frontage.	<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 and Encourage active lifestyles 	<p style="text-align: center;">0 0 +? + ++ 0 ++ + ++</p>	
	<p>Commentary</p> <p>This approach would involve the continuation of the adopted 2015 Local Plan two-tiered retail frontage policy, with designated primary and secondary frontages. It sets out clear guidelines as to which uses are acceptable in primary frontages, though would not place limits restricting the proportion of non-retail uses allowed on a given frontage. For secondary frontages, greater policy flexibility is afforded to encourage a wider range of main town centre uses. 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. This approach has helped to facilitate a reduction in the amount of vacant town centre units since its adoption, and it is considered to represent the most economically sustainable and pro-active way forward, being consistent with the updated use class order and responding to the need for flexibility given the current economic challenges. It is therefore considered to represent the most appropriate and sustainable option.</p>		

Policy TC2: Town Centre Neighbourhood Facilities			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	Option 1: A Local Plan policy dedicated to supporting town centre facilities and services to meet the needs of a growing town centre residential population.		
Option 1: A Local Plan policy dedicated to supporting town centre facilities and services to meet the needs of a growing town centre residential population.	<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 and Encourage active lifestyles 	<p style="text-align: center;">+ +? + + + 0 + ++ ++</p>	
	<p>Commentary</p> <p>The number of residents living in the Town Centre has significantly increased, and from a starting point of 214 residential units in 2014, there are now over 1,000 dwellings in the Town Centre, and a residential population of around 1,500 people. It is anticipated that, over the Plan period to 2040, a further 1,900 dwellings will come forward in the Town Centre, bringing the total to just over 3,000 residential units. Given the increasing residential population living in the Town Centre, it will be important to ensure that the facilities and services required to support the day-to-day needs of a growing Town Centre residential population are in place. Whilst it is possible that without a Local Plan policy, some of the facilities and services needed to support the Town Centre residential population may come forward through the market, some of these uses are not identified in the NPPF as main town centre uses, for example community facilities, and therefore national policy would not necessarily help address some requirements. A dedicated policy to encourage these uses in the Town Centre can help to enable their delivery and support the function of the Town Centre as a neighbourhood, also adding to its overall sense of vibrancy and vitality. Therefore, Option 1 represents the more sustainable approach.</p>		
Option 2: Rely on more general Local	<ol style="list-style-type: none"> 1. To minimise climate change 2. To adapt to climate change 	<p style="text-align: center;">0 0</p>	

Plan policies to support the delivery of supporting town centre facilities and services to meet the needs of a growing Town Centre residential population.	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 and Encourage active lifestyles	-	
<p>Commentary Without a dedicated Local Plan Policy, the Local Plan would not be pro-active in supporting the delivery of community facilities and services in the Town Centre to support its residential population. It is possible that without a Local Plan policy, some of the facilities and services needed to support the Town Centre residential population may come forward through the market. However, some of these uses are not identified in the NPPF as main town centre uses, for example community facilities, and therefore national policy would not necessarily help address some requirements. Therefore, it is considered that Option 2 does not represent the most sustainable approach.</p>			

Policy TC3: Town Centre Key Opportunity Sites			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	<p>Option 2: Roll forward Local Plan allocations, and identify additional allocations. Provide flexible policy guidance to facilitate delivery.</p> <p>The chosen policy approach 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, whilst providing flexibility to support a range of residential, main town centre, and supporting neighbourhood uses.</p>		
Option 1: Roll forward Local Plan allocations, and identify new allocations. Provide prescriptive policy guidance to detail appropriate uses for each allocation.	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 and Encourage active lifestyles	+ + +? + +? 0 +? + +	
<p>Commentary This approach would involve the roll forward of existing allocations in addition to identifying new allocations from the Town Centre SPD and scoping of any possible sites through the Strategic Housing Land Availability Assessment (SHLAA). Through retaining existing and identifying new allocations, this approach provides an opportunity to deliver homes, jobs, and leisure provision (meeting SA 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 (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). Through the allocation of an increased number of sites, this option is capable of meeting demand for town centre uses including retail, employment, leisure and residential, as required under NPPF paragraph 23. However, it is recognised that ensuring the viability and deliverability of sites remains a key NPPF objective, and there is risk that too prescriptive a requirement for each allocation could deter delivery. 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 1 is not considered to represent the most sustainable way forward.</p>			
Option 2: Roll forward Local Plan allocations, and identify additional	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	+ + ++ ++ ++	

allocations. Provide flexible policy guidance to facilitate delivery.	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 and Encourage active lifestyles	++	
<p>Commentary</p> <p>This approach would involve the roll forward of existing Local Plan allocations, in addition to identifying new allocations from the Town Centre SPD and through the SHLAA. Through identifying unimplemented and new allocations, this option provides greater opportunity to deliver homes, jobs, and leisure provision (meeting SA 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 developer contributions, this option can also ensure the provision of sufficient infrastructure (SA Objective 8).</p> <p>Through the allocation of unimplemented and new sites, this option is best placed to meet demand for a range of main town centre uses, residential and supporting neighbourhood facilities.</p> <p>By incorporating scope for the flexibility of different uses, this policy meets the NPPF objectives, and therefore, represents a more sustainable policy approach than Option 1.</p>			

Policy TC4: Active and Engaging Frontages			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	Option 2: Prepare policy to provide specific guidance to achieve active and engaging frontages in the Town Centre, building upon general design guidance, policies and NPPF.		
Option 1: Rely on general design policies of the Local Plan and the NPPF.	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 and Encourage active lifestyles	+? +? + 0 0 0 0 0 0 +	
<p>Commentary</p> <p>With the Local Plan encouraging a range of main town centre uses, and being supportive of neighbourhood facilities, residential and mixed-use development, there is a need to ensure development in the Town Centre is carefully planned and designed to engage and interact positively with the public realm. To achieve this, Option 1 would rely solely on the general design policies of the Local Plan. Whilst this approach would still support well-designed schemes, it is considered that the Town Centre is a location where specific guidance is needed in order to support its overall vitality and vibrancy.</p>			
Option 2: Prepare policy to provide specific guidance to achieve active and engaging frontages in the Town Centre, building upon general design guidance, policies and NPPF.	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 and Encourage active lifestyles	+? +? ++ 0 0 0 0 0 0 ++	
<p>Commentary</p> <p>With the Local Plan encouraging a range of main town centre uses, and being supportive of neighbourhood facilities, residential and mixed-use development, there is a need to ensure development is carefully planned and designed to engage and interact positively with the public realm in the Town Centre. To achieve this, Option 2 would introduce a specific policy to ensure that</p>			

	ground floor development in the Town Centre adds to its overall vitality and viability through the provision of active and engaging frontages, building upon the general design policies of the Local Plan.
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Policy TC5: Town Centre First

Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	<p>Option 2: Local Plan policy that supports the town centre first approach, with interpretation of NPPF town centre 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, this approach enables the Local Plan to respond to recommendations in its evidence base to introduce a locally defined retail impact threshold of 500sqm as the trigger for retail impact assessment, helping to ensure that edge-of-centre and out-of-centre retail development does not individually or cumulatively undermine the vitality and viability of the Town Centre. The approach also enables acknowledgement to be made within the policy of the function of the existing out-of-centre retail locations as a focus for retail, subject to sequential and impact testing, whilst recognising that these are not defined as centres. This enables the town centre first approach to be best applied through policy at the local level. Therefore, Option 2 is considered to represent the most sustainable approach.</p>		
Option 1: Rely on the NPPF to apply the town centre first approach.	1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home. 5. Maintain/ support employment base 6. Conserve/enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	+ + + 0 + 0 + + +	
	<p>Commentary</p> <p>Option 1 would rely on the NPPF to apply the town centre first approach. Whilst this would enable the local planning authority to draw upon national policy to direct retail and leisure 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.	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 and Encourage active lifestyles	++ + ++ 0 ++ 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 whilst having regard to local circumstance.</p> <p>This enables the policy to set a locally defined retail impact threshold of 500sqm, as the trigger for retail impact assessment, helping to ensure that edge-of-centre and out-of-centre retail development does not individually or cumulatively undermine the vitality and viability of the Town Centre. In doing so, the approach responds to recommendations of the Crawley Retail, Commercial Leisure and Town Centre Neighbourhood Needs Assessment (2020), that considers the impact of edge-of-centre and out-of-centre retail on the overall vitality and viability of the Town Centre. Further the approach enables the policy to identify existing out-of-centre locations as the focus for out-of-centre retail proposals, though does not define these locations as formal retail centres, and applications in these areas would therefore need to satisfy the sequential and impact tests. As such, it supports the promotion of a vital and viable town centre, whilst enabling the development of</p>		

identified edge-of-centre locations, and 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. Further, it enables office uses to be excluded from the requirement to apply the sequential test, recognising the established function of the dedicated main employment areas. 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. 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.

Housing Delivery

Policy H1: Housing Provision			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	<p>Option 6: Identify housing need on basis of ‘uncapped’ standard method figure (i.e. 755dpa and 12,835 12,080 over period 2024 2023-2040). Set ‘supply-led’ housing requirement (stepped according to phasing of housing supply) – i.e. minimum of 314 dwellings p.a. over period 2024 2023-2040, stepped as a 386dpa requirement over years 1-10 and 210dpa in years 11-17 400dpa requirement over years 1-5, 360dpa in years 6-10, and 205dpa in years 11-16). Explicitly identify unmet need.</p> <p>Option 6 is the preferred option on the basis of its net impacts and the evidential basis available to support it. Jointly with Options 2, 3, 7, 8, and 9, it has the most favourable net impact (being mainly neutral with potential negative impacts on SA Objectives 4 and 5). This reflects the finding, based on the Local Plan evidence base, that housing provision in excess of the ‘supply-led’ level would have multiple negative impacts in relation to the built and natural environment, infrastructure, and sustainable communities. In common with Options 3 and 9 it has the benefit that mitigation of negative impacts on SA Objectives 4 and 5 is provided by establishing the amount of unmet need arising from the borough within the policy and identifying the scope of work required by the council to ensure this need is met within sustainable and accessible locations suitable for residents of Crawley. This is expected to be achieved through effective Duty to Cooperate working across the Housing Market Area and with ongoing wider partnership working to ensure the delivery of sufficient housing in the mid to longer term where this is in accordance with other sustainable planning policies. Option 6 is also preferred to Options 3 and 9 in light of the absence of evidence or reasons to justify departing from the uncapped Standard Method housing need figure.</p>		
Option 1: Identify housing need in excess of uncapped Standard Method figure (e.g. at a level 2.5 times the identified level of affordable housing need of 739dpa – i.e. 1848dpa – thereby taking account of affordable housing need while retaining rough historical level of proportionality between affordable and market dwellings (i.e. 40/60 per cent)) Set annualised housing requirement which seeks to meet full extent of identified need (e.g. 1848dpa = 29,568 31,416 over Local Plan period).	<ol style="list-style-type: none"> 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 and landscape 7. Reduce car journeys, sufficient transport infrastructure 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles 	<p>/</p> <p>-</p> <p>--</p> <p>++</p> <p>+</p> <p>-</p> <p>-</p> <p>--</p>	
	<p>Commentary</p> <p>Option 1 would identify housing need in excess of the level calculated using the uncapped Standard Method and then set a housing requirement which would seek to meet the identified need in full. One plausible basis for identifying a higher level of need would be the identified affordable housing need of 739dpa, which can be used to establish a total need figure using the assumption that a ratio of 40/60 affordable/market dwellings would be achieved, in line with existing and proposed CBC policy. This results in a figure of 1848dpa, or 29,568 31,416 in total over the Local Plan period. This option is considered to involve a significant positive impact on SA Objective 4 as well as a positive impact on SA Objective 5, reflecting the support which the additional residential population would provide for the employment base of the borough. However, on the basis of the Local Plan evidence base the achievement of housing delivery at this level would involve breaching constraints in terms of</p>		

	<p>the built and natural environment (SA Objectives 3 and 6), infrastructure (SA Objectives 7 and 8) and sustainable communities (SA Objective 9), resulting in negative or significant negative impacts in these areas. There would also be an anticipated negative impact on SA Objective 2, owing to the anticipated increased vulnerability of development to flooding and overheating. The impact on SA Objective 1 is considered broadly neutral overall, reflecting the fact that although some local negative impacts would be anticipated (e.g. on biodiversity, transport infrastructure) much of the borough represents a relatively sustainable location for development.</p> <p>As a separate comment it is observed that the level of total housing need identified in this option significantly exceeds past trends, whereas there is no established basis in terms of reasons or evidence to project such an increase.</p>		
<p>Option 2: Identify housing need in excess of uncapped Standard Method figure (e.g. at a level 2.5 times the identified level of affordable housing need of 739dpa – i.e. 1848dpa – thereby taking account of affordable housing need while retaining rough historical level of proportionality between affordable and market dwellings (i.e. 40/60 per cent)) Set ‘supply-led’ housing requirement (stepped according to phasing of housing supply) – i.e. minimum of 314 dwellings p.a. over period 2024 2023-2040, stepped as a 386dpa requirement over years 1-10 and 210dpa in years 11-17 400dpa requirement over years 1-5, 360dpa in years 6-10, and 205dpa in years 11-16.)</p>	<ol style="list-style-type: none"> 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 and landscape 7. Reduce car journeys, sufficient transport infrastructure 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and 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>Option 2 would identify housing need in excess of the level calculated using the uncapped Standard Method but would then set a stepped ‘supply-led’ housing requirement, reflecting identified local constraints.</p> <p>One plausible basis for identifying a higher level of need would be the identified affordable housing need of 739dpa, which can be used to establish a total need figure using the assumption that a ratio of 40/60 affordable/market dwellings would be achieved, in line with existing and proposed CBC policy. This results in a figure of 1848dpa, or 29,568 31,416 in total over the Local Plan period.</p> <p>The ‘supply led’ housing requirement reflects the housing land supply identified in the Local Plan evidence base, including the SHLAA, Windfall Statement, and Housing Supply Topic Paper.</p> <p>This option is considered to have potential negative impacts on objective 4, with an associated potential negative impact on SA Objective 5, reflecting a potentially more constrained labour supply within the borough. Impacts on indicators associated with the built and natural environment (SA Objectives 3 and 6), infrastructure (SA Objectives 7 and 8), and sustainable communities (SA Objective 9) are considered to be neutral, since the level of housing provision in this option can be met while respecting local constraints. The impact on SA Objective 1 is considered to be neutral, reflecting the manner in which, on the downside, the option envisages some constraint on housing growth within a relatively sustainable and accessible borough, while on the upside, the assets which make Crawley a sustainable location (including transport infrastructure and biodiversity assets) would be appropriately protected. The impact on SA Objective 2 is also considered to be neutral, since there would be no net change in the anticipated climate resilience of development.</p> <p>As a separate comment it is observed that the level of total housing need identified in this option significantly exceeds past trends, whereas there is no established basis in terms of reasons or evidence to project such an increase.</p>		
<p>Option 3: Identify housing need in excess of uncapped Standard Method figure (e.g. at a level 2.5 times the identified level of affordable housing need of 739dpa – i.e. 1848dpa – thereby taking account of affordable housing need while retaining</p>	<ol style="list-style-type: none"> 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. Ensure the provision of sufficient infrastructure 	<p>/</p> <p>/</p> <p>/</p> <p>-?</p> <p>-?</p> <p>/</p> <p>/</p> <p>/</p>	

<p>rough historical level of proportionality between affordable and market dwellings (i.e. 40/60 per cent) Set 'supply-led' housing requirement (stepped according to phasing of housing supply) – i.e. minimum of 314 dwellings p.a. over period 2024 2023-2040, stepped as a 386dpa requirement over years 1-10 and 210dpa in years 11-17 400dpa requirement over years 1-5, 360dpa in years 6-10, and 205dpa in years 11-16). Explicitly identify unmet need.</p>	<p>9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles</p> <p>Commentary</p> <p>Option 3 would identify housing need in excess of the level calculated using the uncapped Standard Method but would then set a stepped 'supply-led' housing requirement, reflecting identified local constraints.</p> <p>One plausible basis for identifying a higher level of need would be the identified affordable housing need of 739dpa, which can be used to establish a total need figure using the assumption that a ratio of 40/60 affordable/market dwellings would be achieved, in line with existing and proposed CBC policy. This results in a figure of 1848dpa, or 29,568 31,416 in total over the Local Plan period.</p> <p>The 'supply led' housing requirement reflects the housing land supply identified in the Local Plan evidence base, including the SHLAA, Windfall Statement, and Housing Supply Topic Paper.</p> <p>This option is considered to have potential negative impacts on SA Objective 4, with an associated potential negative impact on SA Objective 5, reflecting a potentially more constrained labour supply within the borough.</p> <p>In this option, these impacts are mitigated by acknowledging the level of unmet need within the Policy and clarifying how this will continue to be addressed. Whilst the ability to deliver the housing levels required outside of the borough's administrative boundaries remains beyond the control of the council, by setting this out in the Policy neighbouring authorities, in the preparation of their development plans, will have a clear indication of the scale and expectations relating to Crawley's housing needs.</p> <p>Impacts on indicators associated with the built and natural environment (SA Objectives 3 and 6), infrastructure (SA Objectives 7 and 8), and sustainable communities (SA Objective 9) are considered to be neutral, since the level of housing provision in this option can be met while respecting local constraints. The impact on SA Objective 1 is considered to be neutral, reflecting the manner in which, on the downside, the option envisages some constraint on housing growth within a relatively sustainable and accessible borough, while on the upside, the assets which make Crawley a sustainable location (including transport infrastructure and biodiversity assets) would be appropriately protected. The impact on SA Objective 2 is also considered to be neutral, since there would be no net change in the anticipated climate resilience of development.</p> <p>As a separate comment it is observed that the level of total housing need identified in this option significantly exceeds past trends, whereas there is no established basis in terms of reasons or evidence to project such an increase.</p>	<p>/</p>	
<p>Option 4: Identify housing need on basis of 'uncapped' standard method figure (i.e. 755dpa and 12,080 over period 2024 2023-2040) Set annualised housing requirement which seeks to meet full extent of identified need (i.e. 755dpa = 12,835 12,080 over Local Plan period).</p>	<ol style="list-style-type: none"> 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 and landscape 7. Reduce car journeys, sufficient transport infrastructure 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles <p>Commentary</p> <p>Option 4 would identify housing need at the level calculated using the uncapped Standard Method and then set a housing requirement which would seek to meet the identified need in full.</p> <p>This option is considered to involve a significant positive impact on SA Objective 4 as well as a positive impact on SA Objective 5, reflecting the support which the additional residential population would provide for the employment base of the borough. However, on the basis of the Local Plan evidence base the achievement of housing delivery at this level would involve breaching constraints in terms of the built and natural environment (SA Objectives 3 and 6), infrastructure (SA Objectives 7 and 8) and sustainable communities (SA Objective 9), resulting in negative impacts in these areas. There would also be an anticipated negative impact on SA Objective 2, owing to the anticipated increased vulnerability of development to flooding and overheating. The impact on SA Objective 1 is considered broadly neutral overall, reflecting the fact that although some local negative impacts would be</p>	<p>/</p> <p>-</p> <p>-</p> <p>++</p> <p>+</p> <p>-</p> <p>-</p> <p>-</p> <p>-</p> <p>-</p>	

	anticipated (e.g. on biodiversity, transport infrastructure) much of the borough represents a relatively sustainable location for development.		
Option 5: Identify housing need on basis of ‘uncapped’ standard method figure (i.e. 755dpa and 12,080 12,835 over period 2024 2023 -2040) Set ‘supply-led’ housing requirement (stepped according to phasing of housing supply) – i.e. minimum of 314 dwellings p.a. over period 2024 2023 -2040, stepped as a 386dpa requirement over years 1-10 and 210dpa in years 11-17 400dpa requirement over years 1-5, 360dpa in years 6-10, and 205dpa in years 11-16).	<ol style="list-style-type: none"> 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 and landscape 7. Reduce car journeys, sufficient transport infrastructure 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and 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>Option 5 would identify housing need at the level calculated using the uncapped Standard Method but would then set a stepped ‘supply-led’ housing requirement, reflecting identified local constraints. The ‘supply led’ housing requirement reflects the housing land supply identified in the Local Plan evidence base, including the SHLAA, Windfall Statement, and Housing Supply Topic Paper. This option is considered to have potential negative impacts on SA Objective 4, with an associated potential negative impact on SA Objective 5, reflecting a potentially more constrained labour supply within the borough. Impacts on indicators associated with the built and natural environment (SA Objectives 3 and 6), infrastructure (SA Objectives 7 and 8), and sustainable communities (SA Objective 9) are considered to be neutral, since the level of housing provision in this option can be met while respecting local constraints. The impact on SA Objective 1 is considered to be neutral, reflecting the manner in which, on the downside, the option envisages some constraint on housing growth within a relatively sustainable and accessible borough, while on the upside, the assets which make Crawley a sustainable location (including transport infrastructure and biodiversity assets) would be appropriately protected. The impact on SA Objective 2 is also considered to be neutral, since there would be no net change in the anticipated climate resilience of development. As a separate comment it is observed that the level of total housing need identified in this option significantly exceeds past trends, whereas there is no established basis in terms of reasons or evidence to project such an increase.</p>		
Option 6: Identify housing need on basis of ‘uncapped’ standard method figure (i.e. 755dpa and 12,080 12,835 over period 2024 2023 -2040). Set ‘supply-led’ housing requirement (stepped according to phasing of housing supply) – i.e. minimum of 314 dwellings p.a. over period 2024 2023 -2040, stepped as a 386dpa requirement over years 1-10 and 210dpa in years 11-17 400dpa requirement over years 1-5, 360dpa in years 6-10, and 205dpa in years 11-16).	<ol style="list-style-type: none"> 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 and landscape 7. Reduce car journeys, sufficient transport infrastructure 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles 	<p>/</p> <p>/</p> <p>/</p> <p>-?</p> <p>-?</p> <p>/</p> <p>/</p> <p>/</p> <p>/</p> <p>/</p>	Mitigation of the potential negative impact on SA Objective 4 (Opportunity to live in a decent and affordable home) and SA Objective 5 (Maintain/ support employment base) is provided by establishing the amount of unmet need arising from the borough within the policy and identifying the scope of work required by the council to ensure this need is met within sustainable and accessible locations suitable for residents of Crawley. This is expected to be achieved through effective Duty to Cooperate working across the Housing Market Area and with ongoing wider partnership working to ensure the delivery of sufficient housing in the mid to longer term where this is in accordance with other sustainable planning policies.
Explicitly identify unmet need.	<p>Commentary</p> <p>Option 6 would identify housing need at the level calculated using the uncapped Standard Method but would then set a stepped ‘supply-led’ housing requirement, reflecting identified local constraints. The ‘supply led’ housing requirement reflects the housing land supply identified in the Local Plan evidence base, including the SHLAA, Windfall Statement, and Housing Supply Topic Paper. This option is considered to have potential negative impacts on SA Objective 4, with an associated</p>		

	<p>potential negative impact on SA Objective 5, reflecting a potentially more constrained labour supply within the borough.</p> <p>In this option, these impacts are mitigated by acknowledging the level of unmet need within the Policy and clarifying how this will continue to be addressed. Whilst the ability to deliver the housing levels required outside of the borough’s administrative boundaries remains beyond the control of the council, by setting this out in the Policy neighbouring authorities, in the preparation of their development plans, will have a clear indication of the scale and expectations relating to Crawley’s housing needs.</p> <p>Impacts on indicators associated with the built and natural environment (SA Objectives 3 and 6), infrastructure (SA Objectives 7 and 8), and sustainable communities (SA Objective 9) are considered to be neutral, since the level of housing provision in this option can be met while respecting local constraints. The impact on SA Objective 1 is considered to be neutral, reflecting the manner in which, on the downside, the option envisages some constraint on housing growth within a relatively sustainable and accessible borough, while on the upside, the assets which make Crawley a sustainable location (including transport infrastructure and biodiversity assets) would be appropriately protected. The impact on SA Objective 2 is also considered to be neutral, since there would be no net change in the anticipated climate resilience of development.</p>		
<p>Option 7: Identify housing need on basis of ‘capped’ standard method figure (i.e. 476dpa and 7,616 8,092 over period 2024 2023-2040) Set annualised housing requirement which seeks to meet full extent of identified need (i.e. 476dpa = 7,616 8,092 over local plan period).</p>	<ol style="list-style-type: none"> 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 and landscape 7. Reduce car journeys, sufficient transport infrastructure 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and 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>Commentary</p> <p>Option 7 would identify housing need at the level calculated using the capped Standard Method and then set a housing requirement which would seek to meet the identified need in full.</p> <p>The use of the cap as part of the Standard Method calculation is not considered to provide a reasonable basis for calculating housing need in Crawley, since the cap is being applied to a housing requirement which is already supply-constrained, and the resulting level of need is below levels which have previously been identified, without there being clear reasons or evidence to justify this.</p> <p>As such this option is considered to involve a neutral overall impact on SA Objective 4 and SA Objective 5, since the benefit of an increase in housing supply compared with historical levels needs to be balanced against the impact of setting the overall need figure at an artificially low level.</p> <p>On the basis of the Local Plan evidence base the achievement of housing delivery at this level would likely involve breaching constraints in terms of the built and natural environment (SA Objectives 3 and 6), infrastructure (SA Objectives 7 and 8) and sustainable communities (SA Objective 9), resulting in potential negative impacts in these areas. There would also be an anticipated potential negative impacts on SA Objective 2, owing to the likely increased vulnerability of development to flooding and overheating. The impact on SA Objective 1 is considered broadly neutral overall, reflecting the fact that although some local negative impacts would be anticipated (e.g. on biodiversity, transport infrastructure) much of the borough represents a relatively sustainable location for development.</p>		
<p>Option 8: Identify housing need on basis of ‘capped’ standard method figure (i.e. 476dpa and 7,616 8,092 over period 2024 2023-2040) Set ‘supply-led’ housing requirement (stepped according to phasing of housing</p>	<ol style="list-style-type: none"> 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 and landscape 7. Reduce car journeys, sufficient transport infrastructure 8. Ensure the provision of sufficient 	<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>supply) – i.e. minimum of 314 dwellings p.a. over period 2024 2023- 2040, stepped as a 386dpa requirement over years 1-10 and 210dpa in years 11-17 400dpa requirement over years 1-5, 360dpa in years 6-10, and 205dpa in years 11-16).</p>	<p>infrastructure</p> <p>9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles</p>	<p>/</p>	
<p>Commentary</p> <p>Option 8 would identify housing need at the level calculated using the capped Standard Method but would then set a stepped ‘supply-led’ housing requirement, reflecting identified local constraints. The ‘supply led’ housing requirement reflects the housing land supply identified in the Local Plan evidence base, including the SHLAA, Windfall Statement, and Housing Supply Topic Paper. This option is considered to have potential negative impacts on SA Objective 4, with an associated potential negative impact on objective 5, reflecting a potentially more constrained labour supply within the borough. Impacts on indicators associated with the built and natural environment (SA Objectives 3 and 6), infrastructure (SA Objectives 7 and 8), and sustainable communities (SA Objective 9) are considered to be neutral, since the level of housing provision in this option can be met while respecting local constraints. The impact on SA Objective 1 is considered to be neutral, reflecting the manner in which, on the downside, the option envisages some constraint on housing growth within a relatively sustainable and accessible borough, while on the upside, the assets which make Crawley a sustainable location (including transport infrastructure and biodiversity assets) would be appropriately protected. The impact on SA Objective 2 is also considered to be neutral, since there would be no net change in the anticipated climate resilience of development.</p> <p>As a separate comment it is observed that the use of the cap as part of the Standard Method calculation is not considered to provide a reasonable basis for calculating housing need in Crawley, since the cap is being applied to a housing requirement which is already supply-constrained, and the resulting level of need is below levels which have previously been identified, without there being clear reasons or evidence to justify this.</p>			
<p>Option 9: Identify housing need on basis of ‘capped’ standard method figure (i.e. 476dpa and 7,616 8,092 over period 2024 2023-2040) Set ‘supply-led’ housing requirement (stepped according to phasing of housing supply) – i.e. minimum of 314 dwellings p.a. over period 2024 2023- 2040, stepped as a 386dpa requirement over years 1-10 and 210dpa in years 11-17 400dpa requirement over years 1-5, 360dpa in years 6-10, and 205dpa in years 11-16).</p> <p>Explicitly identify unmet need.</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 and landscape 7. Reduce car journeys, sufficient transport infrastructure 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles</p>	<p>/ / / -? -? / / / /</p>	
<p>Commentary</p> <p>Option 9 would identify housing need at the level calculated using the capped Standard Method but would then set a stepped ‘supply-led’ housing requirement, reflecting identified local constraints. The ‘supply led’ housing requirement reflects the housing land supply identified in the Local Plan evidence base, including the SHLAA, Windfall Statement, and Housing Supply Topic Paper. This option is considered to have potential negative impacts on SA Objective 4, with an associated potential negative impact on SA Objective 5, reflecting a potentially more constrained labour supply within the borough. Impacts on indicators associated with the built and natural environment (SA Objectives 3 and 6), infrastructure (SA Objectives 7 and 8), and sustainable communities (SA Objective 9) are considered to be neutral, since the level of housing provision in this option can be met while respecting local constraints.</p> <p>In this option, these impacts are mitigated by acknowledging the level of unmet need within the Policy and clarifying how this will continue to be addressed. Whilst the ability to deliver the housing levels required outside of the borough’s administrative boundaries remains beyond the control of the council, by setting this out in the Policy neighbouring authorities, in the preparation of their development plans, will have a clear indication of the scale and expectations relating to Crawley’s housing needs.</p> <p>The impact on SA Objective 1 is considered to be neutral, reflecting the manner in which, on the downside, the option envisages some constraint on housing growth within a relatively sustainable and accessible borough, while on the upside, the assets which make Crawley a sustainable location (including transport infrastructure and biodiversity assets) would be appropriately protected. The</p>			

impact on SA Objective 2 is also considered to be neutral, since there would be no net change in the anticipated climate resilience of development.

As a separate comment it is observed that the use of the cap as part of the Standard Method calculation is not considered to provide a reasonable basis for calculating housing need in Crawley, since the cap is being applied to a housing requirement which is already supply-constrained, and the resulting level of need is below levels which have previously been identified, without there being clear reasons or evidence to justify this.

Policy H2: Key Housing Sites

Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	<p>Option 3: Identify specific ‘deliverable’ and ‘developable’ housing sites to meet Crawley’s housing requirements over the Plan period (2024 2023-2040) and provide more detailed criteria for specific housing sites.</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 2040. Paragraph 67 of the NPPF identifies that local plans should identify key sites which are critical to the delivery of their housing requirement, including 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 11-16.</p>		
Option 1: Not identifying a series of deliverable and developable housing sites to meet Crawley’s housing needs.	<ol style="list-style-type: none"> 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 and landscape 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 and Encourage active lifestyles 	<p>0</p> <p>-</p> <p>-</p> <p>?</p> <p>0</p> <p>-</p> <p>-</p> <p>-</p> <p>-</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 (SA 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 and 5 were ruled out on the basis that they are not specifically related to the location of future housing development.</p>		
Option 2: Identify specific ‘deliverable’ and ‘developable’ housing sites to meet Crawley’s housing requirements over the Plan period (2024 2023-2040).	<ol style="list-style-type: none"> 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 and landscape 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 and 	<p>0</p> <p>+</p> <p>+</p> <p>+</p> <p>0</p> <p>+</p> <p>+</p> <p>+</p> <p>+</p> <p>+</p>	

	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, SA Objective 3 (Protection and Enhancement of the Built Environment and Character), SA Objective 6 (Conservation and Enhancement of Biodiversity and Key Landscape Features), SA Objective 7 (Reduction in car journeys and promotion of sustainable methods of transport) and SA 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>		
Option 3: Identify specific 'deliverable' and 'developable' housing sites to meet Crawley's housing requirements over the Plan period (2024 2023-2040) and provide more detailed criteria for specific housing sites.	<ol style="list-style-type: none"> 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 and landscape 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 and Encourage active lifestyles 	<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>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.</p> <p>Needs of older people can be helped to be met through the specific allocation of two housing sites for older people's accommodation.</p>
	<p>Commentary</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, SA Objective 3 (Protection and Enhancement of the Built Environment and Character), SA Objective 6 (Conservation and Enhancement of Biodiversity and Key Landscape Features), SA Objective 7 (Reduction in car journeys and promotion of sustainable methods of transport) and SA 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, 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.</p> <p>Evidence has indicated a need for provision of specialist housing to meet the needs of older people. Two sites can be allocated for this purpose and help support the principle of ensuring some offer is provided within the borough over the Plan period.</p>		

Policy H3: Housing Typologies			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	<p>Option 1: Include an overarching residential 'typology' policy, setting general key design/amenity/ operational requirements for new residential developments.</p> <p>Option 1 is considered to be preferable owing to the additional benefits in terms of protection of the living environment experienced by existing and future residents.</p>		
Option 1: Include an overarching	<ol style="list-style-type: none"> 1. To minimise climate change 2. To adapt to climate change 	<p>0</p> <p>+</p>	

residential 'typology' policy, setting general key design/amenity/operational requirements for new residential developments.	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 and landscape	0 ++	
	7. Reduce car journeys		
	8. Ensure the provision of sufficient infrastructure	0 ?	
	9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	++	
Commentary			
This policy is not considered to have negative impacts on any of the Sustainability Objectives. The benefits relate specifically to those related to the quality and liveability of the environment which people inhabit, i.e. protection/enhancement of the built environment, quality of accommodation, landscape conservation/ enhancement and a healthy living environment. The benefits associated with this policy include its capacity to operate as an overarching policy in relation to policies relating to specific 'typologies', as proposed in policies H3a to H3f.			
Option 2: Do not include a general typology policy, and rely on wider design/ standards/ amenity policies to ensure appropriate development.	1. To minimise climate change	0	
	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 and landscape	0 +	
	7. Reduce car journeys		
	8. Ensure the provision of sufficient infrastructure	0 ?	
	9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	+	
Commentary			
To some extent the other policies in the Plan can be relied on to provide the kind of sustainability benefits in terms of quality of living environment which are being pursued by this policy, and there are not considered to be negative impacts associated with relying on them alone.			

Policy H3a: Housing Typologies: Estate Regeneration			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	Option 1: Include a specific 'typology' policy for Estate Regeneration. Option 1 is considered to be preferable owing to the additional benefits in terms of protection of the living environment and community cohesion experienced by existing and future residents.		
Option 1: Include a specific 'typology' policy for Estate Regeneration.	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 and landscape	0	
	7. Reduce car journeys	/	
	8. Ensure the provision of sufficient infrastructure	0	
	9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	0 ++	
Commentary			
This option is considered to have no negative impacts and to have positive impacts across those sustainability indicators relating to the quality and environmental performance of homes, the wider			

	living environment, and the promotion of cohesive and socially sustainable communities.		
Option 2: Do not include a specific policy for this 'typology', and rely on wider policies to regulate this form of development.	<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 and landscape 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles 	<p>+?</p> <p>+</p> <p>+</p> <p>+</p> <p>0</p> <p>/</p> <p>0</p> <p>0</p> <p>+</p>	
<p>Commentary</p> <p>To some extent the other policies in the Plan can be relied on to provide the kind of sustainability benefits in terms of quality of living environment and community cohesion which are being pursued by this policy, and there are not considered to be negative impacts associated with relying on them alone.</p>			

Policy H3b: Housing Typologies: Densification, Infill Opportunities and Small Sites

Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	<p>Option 1: Include a specific 'typology' policy for Infill Opportunities and Small Sites.</p> <p>Option 1 is considered to be preferable owing to the additional benefits in terms of protection of the living environment and biodiversity/landscape experienced by existing and future residents.</p>		
Option 1: Include a specific 'typology' policy for Infill Opportunities and Small Sites.	<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 and landscape 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles 	<p>0</p> <p>/</p> <p>++</p> <p>+</p> <p>0</p> <p>++</p> <p>0</p> <p>0</p> <p>+</p>	
<p>Commentary</p> <p>This option is considered to have no negative impacts and to have positive impacts across those sustainability indicators relating to housing provision, the quality of the living environment, and the promotion of sustainable communities.</p>			
Option 2: Do not include a specific policy for this 'typology', and rely on wider policies to regulate this form of development.	<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 and landscape 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles 	<p>0</p> <p>/</p> <p>+</p> <p>+</p> <p>0</p> <p>+</p> <p>0</p> <p>0</p> <p>+</p>	

	<p>Commentary To some extent the other policies in the Plan can be relied on to provide the kind of sustainability benefits in terms of housing provision, the quality of living environment and the promotion of sustainable communities which are being pursued by this policy, and there are not considered to be negative impacts associated with relying on them alone.</p>
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Policy H3c: Housing Typologies: Town Centre Residential Sites			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	<p>Option 1: Include a specific ‘typology’ policy for Town Centre Residential Sites Option 1 is considered to be preferable owing to the additional benefits in terms of the sustainable development of the town centre, such as the safeguarding of business uses, reduced car use and the promotion of sustainable patterns of living.</p>		
Option 1: Include a specific ‘typology’ policy for Town Centre Residential Sites	<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 and landscape 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles 	<p>0 / ++ + ++ 0 ++ / ++</p>	
	<p>Commentary This option is considered to have no negative impacts and to have positive impacts across those sustainability indicators relating to the sustainable development of the town centre. These include housing provision, the quality of the living environment, the safeguarding of business uses, reduced car use and the promotion of sustainable patterns of living.</p>		
Option 2: Do not include a specific policy for this ‘typology’, and rely on wider policies to regulate this form of development.	<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 and landscape 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles 	<p>0 / + + + 0 + / +</p>	
	<p>Commentary To some extent the other policies in the Plan can be relied on to provide the kind of sustainability benefits in terms associated with the sustainable development of the town centre which are being pursued by this policy, and there are not considered to be negative impacts associated with relying on them alone.</p>		

Policy H3d: Housing Typologies: Upward Extensions			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	<p>Option 1: Include a specific ‘typology’ policy for Upward Extensions Option 1 is considered to be preferable owing to the additional benefits in terms of the balancing of housing need against the capacity of the urban environment to accommodate increased densities and needs for infrastructure.</p>		

Option 1: Include a specific 'typology' policy for Upward Extensions	1. To minimise climate change	0	
	2. To adapt to climate change	0	
	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 and landscape	0	
	7. Reduce car journeys	0	
	8. Ensure the provision of sufficient infrastructure	++	
	9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	++	
		+	
Commentary			
This option is considered to have no negative impacts and to have positive impacts across those sustainability indicators which require the balancing of housing need against the capacity of the urban environment to accommodate increased densities and needs for infrastructure. These include housing provision, the quality of the living environment, the provision of sufficient infrastructure, reduced car use and the promotion of sustainable patterns of living.			
Option 2: Do not include a specific policy for this 'typology', and rely on wider policies to regulate this form of development.	1. To minimise climate change	0	
	2. To adapt to climate change	0	
	3. Protect/enhance built environment	+	
	4. Ensure everyone has the opportunity to live in a decent and affordable home	+	
	5. Maintain/support employment base	0	
	6. Conserve/ enhance biodiversity and landscape	0	
	7. Reduce car journeys	+	
	8. Ensure the provision of sufficient infrastructure	+	
	9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	+	
Commentary			
To some extent the other policies in the Plan can be relied on to support the balancing of housing need against the capacity of the urban environment to accommodate increased densities and needs for infrastructure, with associated sustainability benefits. There are not considered to be negative impacts associated with relying on these policies alone.			

Policy H3e: Housing Typologies: Conversions from Commercial/Non-Residential Uses			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	Option 1: Include a specific 'typology' policy for Conversions from Commercial/ Non-residential Uses Option 1 is considered to be preferable owing to the additional benefits in terms of the sustainable regulation of adaptation of non-residential buildings for residential uses.		
Option 1: Include a specific 'typology' policy for Conversions from Commercial/ Non-residential Uses	1. To minimise climate change	++	
	2. To adapt to climate change	0	
	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 and landscape	0	
	7. Reduce car journeys	+	
	8. Ensure the provision of sufficient infrastructure	0	
	9. Healthy, active, cohesive and socially	++	

	sustainable communities and Encourage active lifestyles		
	Commentary This option is considered to have no negative impacts and to have positive impacts across those sustainability indicators relating to the regulation of adaptation of non-residential buildings for residential uses. These include re-use of existing building stock, quality of housing provision and the living environment, the promotion of sustainable patterns of living, and the protection of business and community infrastructure uses.		
Option 2: Do not include a specific policy for this 'typology', and rely on wider policies to regulate this form of development.	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 and landscape 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	+ 0 / + + 0 + + + +	
	Commentary To some extent the other policies in the Plan can be relied on to regulate the adaptation of non-residential buildings for residential uses in a sustainable manner. There are not considered to be negative impacts associated with relying on these policies alone.		

Policy H3f: Housing Typologies: Open Spaces			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	Option 1: Include a specific 'typology' policy for Open Spaces. Option 1 is considered to be preferable owing to the additional benefits in terms of the effective balancing of housing need against maintenance of adequate open space provision.		
Option 1: Include a specific 'typology' policy for Open Spaces.	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 and landscape 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	0 + + + 0 ++ 0 ++ ++	
	Commentary This option is considered to have no negative impacts and to have positive impacts across those sustainability indicators relating to the effective balancing of housing need against maintenance of adequate open space provision. These include climate change adaptation, housing provision, the quality of the living environment and wider landscape, the provision of adequate infrastructure and the promotion of sustainable communities.		
Option 2: Do not include a specific policy for this 'typology', and rely on wider policies to regulate this form of development.	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	0 +? + + 0	

	6. Conserve/ enhance biodiversity and landscape	+	
	7. Reduce car journeys	0	
	8. Ensure the provision of sufficient infrastructure	+	
	9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	+	
<p>Commentary To some extent the other policies in the Plan can be relied on to provide the kind of sustainability benefits in terms associated with the effective balancing of housing need against maintenance of adequate open space provision which are being pursued by this policy, and there are not considered to be negative impacts associated with relying on them alone.</p>			

Meeting Housing Needs

Policy H4: Future Housing Mix			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
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	
	2. To adapt to climate change	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 and landscape	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 and Encourage active lifestyles	+	
<p>Commentary The application of such a policy, will have a positive impact on SA Objective 9 to promote mixed and balanced, more cohesive communities. The impact on SA Objective 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. SA Objectives 1, 2, 3, 5, 6, 7 and 8 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	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 and landscape	0	
	7. Reduce car journeys, sufficient transport infrastructure	0	
	8. Provision of sufficient infrastructure to meet the requirements of the	0	

	borough. 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	--	
Commentary Allowing the housing market to determine the appropriate future mix of housing in terms of dwelling type and size, would have a significant negative impact on future housing supply 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.			

Policy H5: Affordable Housing

Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	Option 8: Affordable Housing requirement with no threshold, a tenure mix broadly based on need and a level broadly based on development viability (i.e. a level below 50%). Both Option 8 and Option 7 had the most positive impacts overall, due to their significant positive impacts on SA Objectives 4, 5 and 9, through the increased provision of affordable housing and the associated benefits in terms of the support of a diverse employment base and the promotion of sustainable communities. Option 8 was preferred over Option 7 since the smaller quantity of affordable housing resulting from Option 8 is considered to be more than offset by the greater range of groups which would be able to access the housing provided.		
Option 1: No affordable housing requirement.	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 and Encourage active lifestyles	0 0 0 -- -- 0 0 --	
Commentary SA Objectives 4, 5 and 9 are considered the most relevant of the sustainability objectives with regards to this policy area. It is not considered to have impacts in relation to the other objectives listed. For Option 1, significant negative impacts considered likely for each of these objectives as the Strategic Housing Market Assessment has demonstrated a high level of need for affordable housing within Crawley, and the removal of any planning requirement for such provision would significantly reduce the amount being delivered. There would be negative impacts in terms of housing affordability, along with associated impacts in terms of the access of the economy to a varied workforce and the promotion of sustainable communities.			
Option 2: Affordable Housing requirement with threshold (i.e. set at 11 dwellings), a tenure mix broadly based on development viability (e.g. focused towards low-cost home ownership tenures) and a level broadly based on development viability (i.e. a level below 50%).	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 and Encourage active lifestyles	0 0 0 / / 0 0 /	
Commentary With Option 2 the negative impacts associated with a decrease in affordable housing provision would be mitigated, although the impact is not considered to be positive in net terms owing to the			

	narrower market served to by the more expensive intermediate forms of affordable housing, and the limited supply of this type of housing which would result, particularly in view of the operation of a threshold of 11 dwellings or above.		
Option 3: Affordable Housing requirement with threshold (i.e. set at 11 dwellings), a tenure mix broadly based on development viability (e.g. focused towards low-cost home ownership tenures) and a level broadly based on need (i.e. a level in excess of 50%).	<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 and Encourage active lifestyles 	<p>0 0 0 + + 0 0 0 +</p>	
Commentary			
Option 3 is considered to represent a net positive in respect of SA Objectives 4, 5 and 9 as a result of the provision of a greater amount of affordable housing when compared with Option 2.			
Option 4: Affordable Housing requirement with threshold (i.e. set at 11 dwellings), a tenure mix broadly based on need (e.g. mainly social/affordable rent) and a level broadly based on need (i.e. a level in excess of 50%).	<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 and Encourage active lifestyles 	<p>0 0 0 - - 0 0 0 -</p>	
Commentary			
Option 4 is considered to have net negative impacts on SA Objectives 4, 5 and 9, since an approach whereby both tenure mix and the level of provision required were set according to need is likely to undermine development viability and lead to lower housing growth overall, thus exacerbating issues of housing affordability.			
Option 5: Affordable Housing requirement with threshold (i.e. set at 11 dwellings), a tenure mix broadly based on need (e.g. mainly social/affordable rent) and a level broadly based on development viability (i.e. a level below 50%).	<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 and Encourage active lifestyles 	<p>0 0 0 + + 0 0 0 +</p>	
Commentary: Option 5 is considered to have net positive impacts on SA Objectives 4, 5 and 9 since while the amount of affordable housing provided would be lower than in Option 3 (also judged to have net positive impacts), this would be offset by fact that the housing provided would be more varied in tenure and thus serve a wider range of groups, including those within the reasonable preference as well as those who can afford to take a first step onto the housing market ladder.			
Option 6: Affordable Housing requirement with no threshold, a tenure mix broadly based on development viability (e.g. focused towards low-cost home ownership tenures)	<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 	<p>0 0 0 + + 0 0 0</p>	

and a level broadly based on development viability (i.e. a level below 50%).	9. Promote sustainable communities and Encourage active lifestyles	+	
	<p>Commentary Option 6 is similar to Option 2, although the absence of the threshold included in that option would result in the delivery of a higher quantity of affordable housing, thereby resulting in net positive impacts for SA Objectives 4, 5 and 9.</p>		
Option 7: Affordable Housing requirement with no threshold, a tenure mix broadly based on development viability (e.g. focused towards low-cost home ownership tenures) and a level broadly based on need (i.e. a level in excess of 50%).	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	++	
	6. Conserve/enhance biodiversity and landscape	0	
	7. Promote sustainable journeys	0	
	8. Provide sufficient infrastructure	0	
	9. Promote sustainable communities and Encourage active lifestyles	0	
		++	
<p>Commentary Option 7 is similar to Option 3, although the absence of the threshold included in that option would result in the delivery of a higher quantity of affordable housing, thereby resulting in more significant positive impacts for SA Objectives 4, 5, and 9.</p>			
Option 8: Affordable Housing requirement with no threshold, a tenure mix broadly based on need and a level broadly based on development viability (i.e. a level below 50%).	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	++	
	6. Conserve/enhance biodiversity and landscape	++	
	7. Promote sustainable journeys	0	
	8. Provide sufficient infrastructure	0	
	9. Promote sustainable communities and Encourage active lifestyles	0	
		++	
<p>Commentary Option 8 is similar to Option 5, although the absence of the threshold included in that option would result in the delivery of a higher quantity of affordable housing, thereby resulting in more significant positive impacts for SA Objectives 4, 5, and 9.</p>			
Option 9: Affordable Housing requirement with no threshold, a tenure mix broadly based on need (e.g. mainly social/affordable rent) and a level broadly based on need (i.e. a level in excess of 50%).	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	-	
	6. Conserve/enhance biodiversity and landscape	-	
	7. Promote sustainable journeys	0	
	8. Provide sufficient infrastructure	0	
	9. Promote sustainable communities and Encourage active lifestyles	0	
		-	
<p>Commentary: Option 9 is similar to Option 4, and is considered to be associated with the same impacts overall in terms of a lower overall level of housing provision, with an associated worsening of affordability issues.</p>			

Policy H6: Build to Rent			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	<p>Option 1: Include a specific policy tailored to 'Build to Rent' developments. This option is preferred owing to its better performance in terms of appropriate housing provision, the maintenance of the employment base, and the promotion of sustainable communities.</p>		

Option 1: Include a specific policy tailored to 'Build to Rent' developments, securing affordable housing in accordance with policy H5 and securing the market rental units for a covenant period.	1. To minimise climate change	0	
	2. To adapt to climate change	0	
	3. Protect/enhance built environment	0	
	4. Ensure everyone has the opportunity to live in a decent and affordable home	++	
	5. Maintain/support employment base	++	
	6. Conserve/ enhance biodiversity and landscape	0	
	7. Reduce car journeys	0	
	8. Ensure the provision of sufficient infrastructure	0	
	9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	++	
Commentary			
This issue relates only to the tenure of developments, and is therefore not considered to have implications for most sustainability indicators. In ensuring that mechanisms are in place to secure appropriate affordable housing provision as part of such developments, and in safeguarding this form of tenure where it is provided, this option is considered to provide significant benefits in terms of access to housing, the promotion of sustainable communities, and support for the presence in Crawley of a diverse workforce.			
Option 2: Do not include a specific policy for this type of development and rely on wider policies to regulate it.	1. To minimise climate change	0	
	2. To adapt to climate change	0	
	3. Protect/enhance built environment	0	
	4. Ensure everyone has the opportunity to live in a decent and affordable home	+	
	5. Maintain/support employment base	+	
	6. Conserve/ enhance biodiversity and landscape	0	
	7. Reduce car journeys	0	
	8. Ensure the provision of sufficient infrastructure	0	
	9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	+	
Commentary			
The existing policies provide a degree of regulation in respect of questions of tenure. Since they fail to take into account the specifics of the Build to Rent model, however, the potential benefits associated with such schemes may not be fully realised, and case-by-case renegotiation of these issues them will be more uncertain and risky for the parties involved.			

Policy H7: Self and Custom Build			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	Option 1: Include a specific policy to encourage and regulate self-build and custom housebuilding as part of appropriate housing developments within Crawley.		
Option 1: Include a specific policy to encourage and regulate self-build and custom housebuilding as part of appropriate housing developments within Crawley.	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 and landscape	0	
	7. Reduce car journeys	0	
	8. Ensure the provision of sufficient infrastructure	0	
	9. Healthy, active, cohesive and socially sustainable communities	+	

	and Encourage active lifestyles		
	<p>Commentary This option is considered to provide a range of sustainability benefits to the extent that self- or custom-build units are likely to be built to better design, construction and sustainability standards, and because requiring a supply of serviced plots will provide opportunities for those without access to land, with associated benefits in terms of sustainable communities and a more diverse workforce.</p>		
Option 2: Do not include a specific policy for this type of housing, and leave it to the market to deliver self-build development.	<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 and landscape 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles 	<p>+? +? +? + 0 0 0 0 0</p>	
	<p>Commentary This option is considered to have limited impacts in respect of most sustainability indicators. The positive benefits associated with self-build (better construction, design, and environmental standards) are meanwhile less certain since they are dependent on the market. In the context of Crawley's limited land supply, meanwhile, would-be self-builders will find it harder to secure plots, and consequently be excluded from the borough.</p>		

Policy H8: Gypsy, Traveller and Travelling Showpeople Sites			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	<p>Option 1: Criteria based policy specific to Gypsies, Travellers and Travelling Showpeople (GTTS) dealing with 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 policy specific to Gypsies, Travellers and Travelling Showpeople (GTTS) Dealing with 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	<ol style="list-style-type: none"> 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 and Encourage active lifestyles 	<p>0 0 ? + 0 - 0 0 +</p>	<p>Mitigation is required for SA Objective 6 as the allocation could have a negative effect on biodiversity/habitats. However, Policy H8 of the Local Plan includes wording to demonstrate that mitigation measures will be required to protect the allocation site from any potential environmental harm.</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 Objective 7 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.</p>		

<p>site would be designated for pitch provision to meet potential future accommodation needs of Gypsies and Travellers.</p>	<p>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 Management 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.</p> <p>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. The provision of pitches may result in the effective identification of a traveller community partially integrated into the settled community with uncertain initial effects on community cohesion. However, overall a positive outcome is anticipated.</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 and Encourage active lifestyles</p>	<p>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 Objective 7 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.</p> <p>The inclusion of caravan accommodation within the existing structure of the borough is likely to look different but not necessarily be damaging to the built environment. 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.</p> <p>The impact of pitch provision may also impact the biodiversity in the borough if provided on certain sites. The provision of pitches may result in the effective identification of a traveller community partially integrated into the settled community with uncertain initial effects on community cohesion. However, overall a positive outcome is anticipated.</p>
<p>Option 3: 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) and protecting local amenity (suitability of specific employment uses in residential areas). However, no</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 and encourage active lifestyles</p>	<p>0 0 - - 0 - 0 0 ?</p>	<p>Commentary SA Objectives 1, 5 and 8 have been assessed as having a neutral impact because of the small scale of the need/land take. Additionally, SA Objective 7 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 and the conservation of biodiversity habitats. The continuation of a bricks and mortar housed Gypsy and Traveller community will not affect the</p>

sites would be designated for Gypsy and Traveller provision within the borough.	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. The impact of individuals living in bricks and mortar accommodation is uncertain.
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Policy H9: Houses in Multiple Occupation

Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option:	<p>Option 2: To restrict HMOs by criteria based on appropriate location, concentration, 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 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 and Encourage active lifestyles	0 0 0 -- 0 0 0 0 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>			
Option 2: To restrict HMOs by criteria based on appropriate location, concentration, design and layout, impact on neighbouring amenity and privacy.	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 and Encourage active lifestyles	0 0 0 + 0 0 0 0 0 +	
<p>Commentary</p> <p>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).</p> <p>SA Objectives 1, 2, 3, 5, 6, 7, and 8 were ruled out on the basis that they are not specifically related to the provision of shared accommodation. 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, in order to enable the policy to be effective in these areas.</p>			

Green Infrastructure

Policy GI1: Green Infrastructure			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
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 and Encourage active lifestyles	++ ++ ++ 0 0 ++ ++ ++ ++	
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. It seeks to protect and enhance green infrastructure. It is anticipated to have significant positive impacts on all of the SA Objectives, apart from SA Objectives 5 and 6 which it is neutral.			
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 and Encourage active lifestyles	- - ? ? ? - 0 - -	
Commentary Not identifying Crawley's valued green infrastructure and requiring impacts upon it to be mitigated or compensated would gradually lead to a more fragmented network of green infrastructure which is unable to respond to climate change and support the growth of the town.			

Policy GI2: Biodiversity Sites			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	Option 1: Identify where biological sites are in Crawley and ensure these designated sites are well protected. This Option has been chosen as it has been adapted from the NPPF and provides the requirements to safeguard particular types of designation that promote the greatest enhancement to natural capital.		
Option 1: Identify where biological sites are in Crawley and ensure these designated sites are well protected. As well as following the Hierarchy of biodiversity sites outside of Crawley.	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 and Encourage active lifestyles	++ + + / / ++ / / +	
Commentary Incorporating the requirement for developments to have up-to-date habitat and species surveys for			

	the listed designated areas when submitting a planning application promotes SA Objectives 1, 2, 3, 6, 8 and 9. Some neutral if not smaller positive impacts are provided through an enhanced designation and provision of biodiversity sites in meeting SA Objective 7.		
Option 2: Do not identify biodiversity 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 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	- - / / / - / / -	
Commentary Not identifying biodiversity sites would provide a negative impact on biodiversity as a whole. Policy is required to mitigate against destruction to the natural capital environment.			
Option 3: Rely on the NPPF	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 and Encourage active lifestyles	+ + + / / + / + +	
Commentary The NPPF forms the basis for this policy as the 2021 version provides the national policy requirement of habitat and species surveys being required for planning applications affecting areas listed under the Hierarchy of Biodiversity sites. However, the NPPF confirms that local plans should identify, map and safeguard wildlife-rich habitats and wider ecological networks. The Local Plan would not be in conformity with the NPPF without this.			

Policy GI3: Biodiversity and Net Gain			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
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. At least a measurable 10% net gain per new development is required in accordance with the Environment Act 2021, is recognised as necessary to reverse this trend and achieve the national ambition of moving from net biodiversity loss to net gain. This can be achieved through the planting and maintenance of soft landscapes and trees, or through off-site gains.		
Option 1: To ensure a net gain in biodiversity.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	++ ++ ++ / / ++ 0 + +	
Commentary This is the most suitable option because biodiversity in England has been declining and becoming			

	<p>more fragmented. The introduction of the Environment Act 2021 includes mandatory biodiversity net gain, with at least a measurable 10% net gain per new development is recognised as necessary to reverse this trend and achieve the national ambition of moving from net biodiversity loss to net gain. Biodiversity Net Gain is to be in addition to existing habitats and species protections.</p> <p>The introduction of Urban Greening Factor and Pollination management plans further promotes increasing net gain and protection of wildlife particularly in an urban area which is characterised by small, brownfield development sites and already degraded wildlife habitats.</p>		
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 and Encourage active lifestyles	+? +? / / / +? 0 - -?	
<p>Commentary</p> <p>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.</p>			

Policy GI4: Local Green Space			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	<p>Option 1: Designate areas of particular importance to a local community.</p> <p>Option 1 is preferred as the site designated is of great importance to the wellbeing of the surrounding community and has particular qualities in terms of nature, heritage, recreation, landscape, tranquillity and access to the wider countryside.</p>		
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 and Encourage active lifestyles	+ +? 0 0 0 ++ 0 ++ ++	
<p>Commentary</p> <p>This option provides significant benefit to the health and wellbeing of the local community. Ifield Brook Meadows and Rusper Road Playing Fields, the designated Local Green Space in Policy GI4, is a very special area for Crawley and provides value to the local community, designated as such due to its particular qualities in terms of nature, heritage, recreation, landscape, tranquillity and access to the wider countryside.</p>			
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 and Encourage active lifestyles	? ? / / / ? 0 ? -?	
<p>Commentary</p> <p>Much of the specific site is already locally designated as a LWS but policy currently protects the overall biodiversity value with mitigation or compensation off-site a possibility. This would be a</p>			

negative consequence for local residents who value the proximity and multifunctional nature of the Local Green Space.

Sustainable Design & Construction

Policy SDC1: Sustainable Design and Construction			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	<p>Option 5: combination of options 2-4 (overarching climate change mitigation/adaptation requirement; advanced CO₂ standard for dwellings; BREEAM standard for non-residential buildings) with implementation of a recognised quality regime to address the 'performance gap'.</p> <p>Option 5 is considered to be the most effective combination of the various possible approaches in respect of Sustainable Design and Construction, offering the most extensive and certain sustainability benefits which are considered achievable in the context of current national policy and legislation.</p>		
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 and Encourage active lifestyles	-- -- 0 - - 0 0 0 -	
<p>Commentary</p> <p>The NPPF requires local planning authorities 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 effective design & construction processes the Plan would not be NPPF compliant. Further to this, failure to include planning policy requirements in this area would be predicted to result in less effective climate change mitigation and adaptation measures, poorer standards of building, increased energy costs for consumers, increased overheating risk, and greater long-run costs for building owners and users arising from the need for more extensive retrofitting of premises in future.</p>			
Option 2: Include a policy relating to development & climate change which requires development to adhere to the 'energy hierarchy', and to adapt to climate change through efficient use of water and mitigation of overheating risk. Relevant measures to be set out in a proportionate 'Sustainability Statement' for significant proposals.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+ + 0 + + +? 0 0 +	
<p>Commentary</p> <p>This kind of overarching requirement is considered valuable as a means of ensuring that all kinds of development, and particularly more significant proposals, are designed and implemented in a way which adheres to key principles of climate change mitigation and adaptation. This is considered to assist climate change mitigation and adaptation; to improve the quality of new buildings; to promote a healthy indoor environment all year round, and to have potential benefits for biodiversity and landscape through such adaptation measures as tree planting and green roofs. The limited scope to set clear quantitative standards within this type of catch-all policy is, however, considered to limit the extent of these benefits.</p>			
Option 3: Combine Option 2 with a CO ₂ emissions standard for new dwellings in advance of Building Regulations requirements, in the form of a 19%	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	

reduction in CO ₂ emissions in comparison with Building Regulations requirements, while allowing scope for this to be superseded by stricter National requirements.	9. Promote sustainable communities and Encourage active lifestyles	0 ++	
	Commentary The requirement suggested in this option is equivalent to the CO ₂ emissions standard included in Level 4 of the discontinued Code for Sustainable Homes, and is considered to be the most advanced standard which is compatible with the Ministerial Statement of March 2015 and the requirement in para. 150.b) of the 2019 NPPF to 'reflect the Government's policy for national technical standards.' The allowance for the introduction of stricter national standards is considered prudent and necessary in the light of anticipated national changes in this area. In addition to the benefits identified in option 2, this option is expected to reduce CO ₂ emissions as well as summer heat gain; and reduce energy costs for residents. Since this standard is now relatively familiar and the technical measures required are becoming cheaper, any additional cost burden on developers is considered to be more than offset by long-run cheaper energy costs, greater appeal to consumers, and the encouragement of greater investment in green technologies.		
Option 4: Combine Option 3 with a requirement for new buildings other than dwellings, in the form of the 'minimum standards' for BREEAM 'Excellent' within the Energy category.	1. Minimise climate change	++	
	2. Adapt to climate change	++	
	3. Protect/enhance built environment	0	
	4. Decent, affordable homes	++	
	5. Maintain/support employment	++	
	6. Conserve/enhance biodiversity and landscape		
	7. Promote sustainable journeys	+?	
	8. Provide sufficient infrastructure	0	
	9. Promote sustainable communities and Encourage active lifestyles	0 ++	
Commentary Non-residential development is likely to take place on a smaller scale than residential development during the Local Plan period, and to that extent an approach setting standards in advance of Building Regulations may have less scope to assist climate change mitigation and adaptation. In addition, consumer pressure and the self-interest of developers are considered to be more effective at driving sustainability improvements in this sector than in the residential sector. Even so, Crawley remains a significant focus of commercial and industrial employment owing to the presence of Gatwick Airport and the Manor Royal Business District, and emissions from commercial and industrial premises are significant. The inclusion of a standard in respect of such development is therefore likely to have net sustainability benefits in terms of climate change mitigation and adaptation. In improving the environmental performance of building stock, this should also have commercial benefits in terms of premises which are less expensive to manage and maintain, and more attractive to business tenants and workers. The 'minimum standards' for BREEAM 'Excellent' are considered to represent an appropriate benchmark for this purpose, representing an improvement on Building Regulations which is benchmarked against the wider building stock, and which is sufficiently flexible to accommodate the varying needs of non-residential developers and building users.			
Option 5: Combine Option 4 with a requirement addressing the 'performance gap' between 'as designed' and 'as built' performance, in the form of a requirement for major development proposals to implement a recognised quality regime.	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	
	9. Promote sustainable communities and Encourage active lifestyles	0 ++	
Commentary In light of the widely recognised 'performance gap', between the performance of new buildings as modelled, and the performance of buildings as actually implemented, it is considered that a requirement of this kind has the potential to reinforce the benefits associated with Option 4. In addition, better construction standards should have benefits in terms of protecting and enhancing the built environment.			
Option 6: Combine Option 5 with a carbon offset fund, enabling developments to mitigate their	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		

emissions by contributing to the cost of other projects which will reduce CO ₂ emissions.	7. Promote sustainable journeys	++?	
	8. Provide sufficient infrastructure	0	
	9. Promote sustainable communities and Encourage active lifestyles	0	
		++?	
Commentary			
Carbon offsetting is identified as a means of achieving very low net CO ₂ emissions. However, in order to be effective, it needs to be combined with very advanced standards, along the lines of the unimplemented 'Zero Carbon Homes' standard. The Code Level 4 standard for dwellings and the BREEAM standard for non-residential development included in Options 3 to 5 are considered appropriate to those types of development and compliant with national policy. They are capable of being implemented on site, and since on-site reductions are more certain than, and should take priority over, off-site mitigation, the option of offsetting is not considered appropriate in the context of Option 5.			
Option 7: Combine Option 5 with a 'Merton'-style policy, specifying a minimum proportion of energy needs which a development should derive from low and zero carbon energy sources.	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 and Encourage active lifestyles	++	
Commentary			
Councils retain the legal ability to require developments to draw a proportion of their energy supply from low or zero carbon energy sources under the Planning and Energy Act 2008. In the context of the overall energy efficiency/emissions standards identified in options 3 to 5, however, it is considered that this approach could be counterproductive to the extent that it might deter 'be lean' measures aimed at reducing overall energy demand, which according to the 'energy hierarchy' should take priority over the use of renewables or low/zero carbon energy sources. Climate change mitigation and adaptation benefits associated with greater fabric efficiencies would therefore be less certain if this kind of requirement were to be introduced.			

Policy SDC2: District Energy Networks

Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	Option 2: Include Local Plan policy with the council at the centre of network development Option 2 has been chosen to be in conformity with national policy. If no policy (Option 1) were taken not only would the Plan 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.		
Option 1: Have no policy in relation to sourcing energy efficiently.	1. Minimise climate change	-?	
	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 and Encourage active lifestyles	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 Local 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. More carbon intensive and expensive (for consumers) forms of energy would be more likely to be installed in the absence of district/ decentralised energy.			
Option 2: Include	1. Minimise climate change	++	

Local Plan policy with the council at the centre of network development.	2. Adapt to climate change	0	
	3. Protect/enhance built environment	0	
	4. Decent, affordable homes	+	
	5. Maintain/support employment	+	
	6. Conserve/enhance biodiversity and landscape	0	
	7. Promote sustainable journeys	0	
	8. Provide sufficient infrastructure	+	
	9. Promote sustainable communities and Encourage active lifestyles	+?	
	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 identified 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 ensuring private development 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	0	
	3. Protect/enhance built environment	0	
	4. Decent, affordable homes	+?	
	5. Maintain/support employment	+?	
	6. Conserve/enhance biodiversity and landscape	0	
	7. Promote sustainable journeys	0	
	8. Provide sufficient infrastructure	+?	
	9. Promote sustainable communities and Encourage active lifestyles	+?	
	Commentary		
The policy would hope to achieve the development of networks by placing the emphasis upon the private sector and the market to deliver them. This results in uncertainty and places a larger burden on the private sector. Due to this reduced certainty of delivery and no guarantee as to the timeframe that they may take to materialise this option has scored worse in this SA.			

Policy SDC3: Tackling Water Stress			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option:	Option 1: A Local Plan policy to mitigate the impact of development on the environment. This approach draws upon the Water Cycle Study (2020) and advice from Environment Agency, Natural England and water companies, seeking to address the locally specific issue of serious water stress. The approach will apply to all areas of the borough that are situated outside of the Southern Water Sussex North Water Resource Zone, which is subject to separate water neutrality requirements. For areas outside of the Sussex North WRZ, the Building Regulations optional technical standard of 110/p/d is applied given the serious water stress in Crawley. The approach pro-actively addresses the identified serious water stress issue, whilst delivering other benefits against identified sustainability indicators.		
Option 1: A Local Plan policy to minimise the impact of development on the environment.	1. Minimise climate change	+	
	2. Adapt to climate change	++	
	3. Protect/enhance built environment	0	
	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 and Encourage active lifestyles	+	
	Commentary		
Crawley is situated in an area of serious water stress, and the Water Cycle Study (2020) strongly			

	<p>recommends that the Local Plan include policy to help mitigate the impact of development on the 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 evidence to retain the more ambitious optional technical standard of 110l/p/d. This approach is supported through the Water Cycle Study by the Environment Agency, Natural England and the water infrastructure companies, including Southern Water and South East Water. The approach also reflects Written Statement HCWS140 dated 1 July 2022 in response to Government consultation on measures to reduce personal water consumption, where the Secretary of State for Environment, Food and Rural Affairs wrote that local authorities would be encouraged to adopt the optional minimum building standard of 110 litres per person per day in all new builds where there is a clear local need, such as in water stressed areas. Allowance has been made for any introduction of tighter nationally described standards that may be introduced subsequently. This approach would help mitigate a locally specific issue, and reflects the priorities identified by statutory stakeholder and infrastructure providers, thereby promoting a more sustainable Local Plan. Therefore, Option 1 is the Local Plan approach.</p>		
Option 2: Do not include a policy and rely on existing national requirements of the NPPF, and conformity with Building Regulations to mitigate the impact of development on the water environment.	<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 and Encourage active lifestyles 	<p>0 - 0 - 0 - 0 - -</p>	
<p>Commentary: This approach would rely on existing national guidance (NPPF) and minimum water efficiency standards as identified in the Building Regulations to mitigate the impact of development on the water environment. In the context of Crawley’s identification as an area of serious water stress, this approach does not pro-actively address water supply constraints, and does not therefore mitigate associated negative impacts on water infrastructure, health, consumers’ water bills, and the resilience of the local environment in the face of climate change.</p>			

Policy SDC4: Water Neutrality			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option:	Option 2: To Set Water Efficiency Target of 85l/p/d for residential developments or achieve a score of 3 credits within the water (WAT01 Water Consumption) issue category for the BREEM Standard for non-residential developments and Require Remainder of Water to be Offset.		
Option 1: To Set Water Efficiency Target of 110l/p/d in line with Building Regs. Optional Standard for residential developments or BREEAM ‘Excellent’ within water category for non-residential developments and Require Remainder of Water to be Offset.	<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 and Encourage active lifestyles 	<p>+ + ?/0 -- -- -+ 0 0 +?</p>	
<p>Commentary: The legal requirement to achieve water neutrality would still require water neutrality even without a plan in place. However, the other policies within the Local Plan will require a positive net gain for biodiversity. As such a minor positive impact has been recorded against SA Objective 6. Minimising water consumption and maximising water efficiency in new developments, as well as offsetting elsewhere, reduces associated energy consumption (in relation to supply and usage) (SA Objectives 1 and 2). The impact is positive but not as positive as it would be with a higher water efficiency target. Nutrient load is reduced as less water is taken from the system. The impact is positive but not as positive as it would be with a higher water efficiency target. It is not known whether this approach would favour greenfield schemes, particularly due to the challenging nature of re-using brownfield land and higher associated viability costs (including higher land values) (SA Objective 3).</p>			

	<p>This Option would rely on greater offsetting levels being achieved or limiting development levels (SA Objectives 4 and 5). Offsetting opportunities are restricted to those within the Sussex North Water Resource Zone, subject to water neutrality. In order to secure the certainty needed for the Local Plans to progress, the Strategy can only rely on those schemes which can be within the control of the local authorities. Whilst it is anticipated it would currently be cheaper to build to 110l/p/d than a more stringent standard in the short term, it is likely this would either take significantly longer to set up an appropriate Implementation Scheme or development levels within the Local Plans would need to be reduced to meet the current known offsetting opportunities, which could increase the cost of contributing to offsetting the remaining water usage. Therefore, this level of water efficiency would allow for 6,345 new dwellings to be delivered to 2029/30 which is somewhat below the areas objectively assessed housing need. As such a significant adverse effect has been recorded for this indicator.</p> <p>Limiting the amount of water use to 110l/p/d will result in less water being abstracted from the environment, thereby reducing associated negative impacts on the wildlife sites in the Arun Valley. Many of these sites are used for leisure and recreation, which improves health and wellbeing. As such a minor positive effect is recorded for SA Objective 9 – albeit it is less positive than the 85l/p/d target.</p>		
<p>Option 2: To Set Water Efficiency Target of 85l/p/d for residential developments or achieve a score of 3 credits within the water (WAT01 Water Consumption) issue category for the BREAM Standard for non-residential developments and Require Remainder of Water to be Offset.</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 and 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;">0</p> <p style="text-align: center;">0</p> <p style="text-align: center;">+</p>	<p>This level of water efficiency would allow for 8,335 new dwellings to be delivered to 2029/30 within the water resource zone alongside Southern Water measures. This figure is below the combined areas' objectively assessed housing need. However, it allows more development than the previous option (Option 1). In addition, the joint councils will work together to develop an Implementation Scheme which will ensure certainty of water neutrality and levels of development are secured in order to minimise the negative impacts on SA Objectives 4 and 5. The Crawley Off-Setting Pilot has allowed for progression of affordable home schemes within the borough and will be incorporated into the Implementation Scheme to maximise its benefits across the whole Water Resource Zone, through providing banked water supply as well as sharing experience and supporting a wider roll out. Monitoring will be necessary to ensure water neutrality is being achieved.</p>
<p>Commentary:</p> <p>The legal requirements to achieve water neutrality would still require water neutrality even without a plan in place, through Development Management processes. However, the other policies within the Local Plan will require a positive net gain for biodiversity, which wouldn't be achieved without a sound and legally compliant (certain) policy approach to water neutrality. As such a minor positive impact has been recorded against SA Objective 6.</p> <p>Minimising water consumption and maximising water efficiency in new developments, as well as offsetting elsewhere, reduces associated energy consumption (in relation to supply and usage) (SA Objectives 1 and 2). 85l/p/d is considered to be achievable and would go beyond the existing Local Plan's Water Stress position, reflecting the unique nature of the water supply constraints on the Sussex North Water Resource Zone. Nutrient load is reduced as less water is taken from the system.</p> <p>Whilst it is acknowledged that it is likely to be cheaper, in the short-term, to build to the Building Regulations Optional Standard of 110l/p/d (Option 1), the Water Neutrality Study has considered costs which suggest the most viable approach to achieve water neutrality is to minimise water consumption at the point of construction and confirms that 85l/p/d is achievable for previously developed land (SA</p>			

Objective 3).
 The Water Neutrality Strategy sets out the levels of development achievable with the Southern Water measures (SA Objectives 4 and 5). Part C confirms there is sufficient capacity within the local authority owned and Registered Social Landlord (RSL) housing stock to meet the additional offsetting levels associated with the Local Plan development levels. This ensures the cost of offsetting can be kept to a minimum whilst maximising certainty for the delivery of housing as far as possible. The local authorities' Implementation Scheme will set out the offsetting programme to meet these needed. This level of water efficiency Option would allow for 8,335 new dwellings to be delivered to 2029/30. This figure is below the combined areas' objectively assessed housing need. However, it allows more development than the previous option (Option 1). As such a minor adverse effect has been recorded for this indicator.
 Limiting the amount of water use to 85l/p/d will result in less water being abstracted from the environment, thereby reducing associated negative impacts on the wildlife sites in the Arun Valley. Many of these sites are used for leisure and recreation, which improves health and wellbeing. As such a minor positive effect is recorded for SA Objective 9.

Environmental Protection

Policy EP1: Development and Flood Risk			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	<p>Option 2: Include a locally specific flood risk policy. 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 SA Objectives 2, 3, 6, 8, and 9.</p>		
Option 1: Rely on national planning guidance.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 + + ? ? + 0 0 +	
	<p>Commentary Under Option 1, the council would rely on the National Planning Policy Framework as the principal policy mechanism to manage the relationship between development and flood risk. A Strategic Flood Risk Assessment would be utilised to interpret national guidance at the local level, delineating areas of flood risk and outlining recommendations to minimise flood risk to property. 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>		
Option 2: Include a locally specific flood risk 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 and Encourage active lifestyles	0 ++ ++ ? ? ++ 0 + +	
	<p>Commentary Under Option 2, the Local Plan 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</p>		

would ensure that development proposals are brought forward in a manner that reflects the 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 the updated Strategic Flood Risk Assessment, and the Gatwick Sub-Regional Water Cycle Study (particularly in terms of requiring Sustainable 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 SA Objectives 2, 3, and 6.

Policy EP2: Flood Risk Guidance for Householder Development and Minor Non-Residential Extensions			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	Option 1: Include a specific policy detailing bespoke requirements for Householder Applications: This option is preferred because the sustainability benefits associated with it, while similar in kind to those in Option 2, are more certain.		
Option 1: Include a specific policy detailing bespoke requirements for Householder Applications	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 and Encourage active lifestyles	/ + 0 0 0 + 0 + +	
	Commentary The provision of a dedicated policy regarding householder applications can be beneficial through enabling the flood impact householder development and small non-residential extensions to be considered on a proportionate basis. This will enable a more effective treatment of flood risk in smaller scale schemes. By providing tailored and proportionate requirements for the treatment of flood risk in the context of householder applications it is considered that this option would achieve better outcomes in terms of flood risk management, which would represent a benefit in terms of climate change adaptation, impact on biodiversity, and infrastructure (surface water drain) facilities.		
Option 2: Leave Householder applications to be determined in accordance with EP1, with tailored guidance for such applications to be provided in the Planning & Climate Change SPD.	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 and Encourage active lifestyles	/ +? +? 0 0 +? 0 +? +?	
	Commentary If a specific policy for householder applications is not included, householders would face disproportionate requirements in relation to the type and scale of development proposed to assess flood risk in accordance with the overarching Policy EP1.		

Policy EP3: Land and Water Quality			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	Option 2: Develop a specific Local Plan policy to manage issues of land quality and contamination. It is considered that the Option 2 approach more readily enables the local planning authority to ensure development, within a context of land quality and contamination, is appropriately and sustainably located.		
Option 1: Rely on existing legislation to manage issues of land quality and 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 and Encourage active lifestyles	0 + 0 0 +	
	Commentary 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.		
Option 2: Develop a specific Local Plan policy to manage issues of land quality and 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 and Encourage active lifestyles	++ ++ ++ + 0 + 0 0 ++	
	Commentary Option 2 would take the form of a specific Local Plan policy to manage issues of land quality and contamination. In developing a Local Plan policy, this approach provides a mechanism through which environmental health advice can be more directly 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.		

Policy EP4: Development and Noise			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	Option 2: Update the existing Local Plan Policy and Noise Annex to take account of new evidence. Option 2 is chosen, as the approach enables greater certainty in informing development management decisions, having regard to empirical evidence on the health impacts of noise exposure. In doing so, this enables 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 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 and Encourage active lifestyles	0 0 0 -- ? 0 0 0 --	
	Commentary Under this option, the Local Plan would not bring forward a policy to manage the relationship between development and noise. This would mean relying on the guidance of the NPPF and Planning Practice Guidance, which do not provide any noise standards to guide planning applications. As such, this option would not provide local noise standards, an approach that is not considered to be as sustainable as Option 2 given the range of noise sources in Crawley and the need to carefully manage		

	the relationship between development and noise.		
Option 2: Update the existing Local Plan policy and Noise Annex to take account of new evidence.	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	+	
	6. Conserve/enhance biodiversity and landscape	0	
	7. Promote sustainable journeys		
	8. Provide sufficient infrastructure	0	
	9. Promote sustainable communities and Encourage active lifestyles	0	
		++	
Commentary			
This approach would update the existing Local Plan Policy and the Local Plan Noise Annex to take account of new evidence. The approach would continue to use the locally specific noise standards identified in the Local Plan Noise Annex to identify the noise exposure levels at which noise impact becomes unacceptable. The policy seeks to manage the relationship between noise sensitive uses, such as residential, and noise generating uses, including employment uses. The policy also continues to draw upon Noise Advice Document: Sussex to guide applications. The Local Plan noise standards have been successfully defended at a number of planning appeals, and retaining and building upon these standards represents the most sustainable approach.			

Policy EP5: Air Quality			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
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.		
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 and Encourage active lifestyles	+ + 0 0 0 0 + 0 0 +	
Commentary			
Under this option, the Local Plan would not bring forward a policy to manage the air quality impact of development. Rather, it would rely on the guidance of the National Planning Policy Framework. However, it is recognised that there is a Sussex-wide approach, through <i>Air Quality & Emissions Mitigation for Sussex</i> , that is in place to support sustainable development and provide a consistency of approach across Sussex. As such, in failing to provide important local context, an approach that relies solely on national guidance would not represent the most sustainable option. As such, it is considered that local policy of some form will be necessary.			
Option 2: Include a locally specific air quality policy in the Local Plan.	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 and Encourage active lifestyles	++ ++ 0 0 0 ++ 0 0 ++	
Commentary			
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, a locally specific policy will more effectively enable the national air quality objectives of the NPPF to be delivered within a local context.

Policy EP6: External Lighting			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	<p>Option 2: Develop a specific Local Plan policy to manage external lighting and issues of light pollution.</p> <p>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 Local Plan approach.</p>		
Option 1: Rely on existing legislation to manage external lighting and issues of light pollution.	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 and Encourage active lifestyles	+ + + + 0 + 0 0 +	
<p>Commentary</p> <p>This approach would rely on existing environmental health and other relevant legislation to ensure that development is brought forward in a manner that does not result in the creation of, or the exposure to, light pollution. Although the approach is sustainable in the sense that key issues will be addressed through existing 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. Therefore, Option 1 is not preferred.</p>			
Option 2: Develop a specific Local Plan policy to manage external lighting and issues of light pollution.	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 and Encourage active lifestyles	++ ++ ++ + 0 + 0 0 ++	
<p>Commentary</p> <p>The Option 2 approach would be to develop a specific Local Plan policy to manage issues of light pollution. In developing a dedicated 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, a dedicated policy provides a mechanism to refer to locally specific guidance set out in the Urban Design SPD. It is considered that Option 2 more readily enables the local planning authority to ensure development promotes the concepts of sustainable development, and is for this reason the more sustainable approach.</p>			

Sustainable Transport

Policy ST1: Development and Requirements for Sustainable Transport			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	<p>Option 1: Include a policy setting out the broad approach to assessing the transport needs of new developments within the framework set by the NPPF, including an emphasis on the prioritisation of accessibility by sustainable modes; support to sustainable transport infrastructure, and requirements for Transport Assessments/Statements and Travel Plans to accompany applications with significant transport implications.</p> <p>Option 1 has been chosen as this policy option will better support the objectives of reducing car journeys substantially (SA Objective 7), and mitigating climate change (SA Objective 1). Furthermore, relying on the broader policies contained within the NPPF (Option 2 may not have an 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 1 could help ensure that the existing transport infrastructure provision is utilised to its full potential. It is also considered that this option will better facilitate in general terms the incorporation of transport and access considerations into the design of new developments.</p>		
Option 1: Include a policy setting out the broad approach to assessing the transport needs of new developments within the framework set by the NPPF, including an emphasis on the prioritisation of accessibility by sustainable modes; support to sustainable transport infrastructure, and requirements for Transport Assessments/Statements and Travel Plans to accompany applications with significant transport implications.	<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 and Encourage active lifestyles 	<p style="text-align: center;">+ + + +? + +? ++ + +</p>	
	<p>Commentary</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. This policy could have a positive impact on the protection of the built environment (SA Objective 3) and the sustainable design of new developments (SA Objective 2) through a reduced need for design considerations to be dictated by the needs of access by private motor vehicle. It is also contended that the sustainable location of both community centres and leisure facilities should assist with participation in sport and in creating cohesive communities (SA Objective 9). It is considered that this policy option will have a possible positive impact upon both affordable housing provision (SA Objective 4) and a positive impact on the maintenance of a diverse employment base (SA Objective 5), through the concentration of such developments on more sustainable, resilient sites. 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.	<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 and Encourage active lifestyles 	<p style="text-align: center;">- - - -? / - - - -</p>	
	<p>Commentary</p> <p>Relying solely on the NPPF is considered to pose a risk of negative outcomes across a wide range of</p>		

sustainability objectives. The NPPF (paragraphs 102-4) places significant emphasis on the role of local plan policies in directing development to sustainable locations, exploiting opportunities to promote sustainable modes, and ensuring that transport considerations are integrated within the design process. Failure to take this proactive role is therefore considered likely to lead to adverse outcomes as a result of inadequate management of transport considerations as part of the planning process.

Policy ST2: Car and Cycle Parking Standards			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	Option 1: Create car and cycle parking standards for different uses including non-residential and residential uses, including requirements for electric vehicle charging points, and taking account of different locations which reflect the different levels of accessibility within the town. Option 1 has been chosen, since it is believed that parking standards, including requirements for electrical charging points, represent a more coherent and effective approach to addressing demand for parking in a sustainable fashion.		
Option 1: Create car and cycle parking standards for different uses including non-residential and residential uses, including requirements for electric vehicle charging points, and taking account of different locations which reflect the different levels of accessibility within the town.	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 and Encourage active lifestyles	++		
		+	
	Commentary The main purpose of this policy option is to ensure that levels and types of parking provision are appropriate and sustainable. Owing to the unique characteristics of Crawley, the adequacy of existing parking provision varies widely across the borough, so an assessment of parking standards which reflects the different levels of accessibility within the town will support reduced car travel and minimise climate change. This will also promote effective use of land, ensuring that land can be released to provide new homes and commercial premises where appropriate. Requirements in respect of electrical vehicle charging will meanwhile provide more robust support for transition to lower emission, less polluting vehicles.		
Option 2: Do not include car and cycle parking standards and instead seek to address this issue on a case-by-case basis with reference to other policies and 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 and Encourage active lifestyles	+?		
		+?	
	Commentary. The presence of other Local Plan policies relating to design, access and operational needs of development should ensure that there is still potential to promote appropriate and sustainable levels of parking via this option. At the same time there are greater risks of these benefits being limited by an inconsistent approach, and a lack of overarching points of reference or supporting evidence base. In addition, the other policies would provide a significantly weaker basis from which to promote more widespread provision of electric vehicle charging points.		

Policy ST3: Improving Rail Stations			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	<p>Option 1: To ensure development within the vicinity of the rail stations provides improvements to enhance the specific roles of each station, and to specifically refer to Policy CL4 which promotes the location of major development near railway stations.</p> <p>Option 1 has been chosen as this policy option has a more positive impact on both the natural and built environment, as improvements to railway stations, and locating development close to stations, should help reduce private motor vehicle travel and therefore ensure that the built environment is enhanced.</p>		
Option 1: To ensure development within the vicinity of the rail stations provides improvements to enhance the specific roles of each station, and to specifically refer to Policy CL4 which promotes the location of major development near railway stations.	<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 and Encourage active lifestyles 	<p style="text-align: center;">+ +? + 0 +? 0 ++ + +?</p>	
	<p>Commentary</p> <p>Requiring improvements to railway stations from development in the vicinity will improve their accessibility and capacity and should therefore promote the use of rail services, and subsequently, reduce car travel and minimise climate change. 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. Linking this policy to Policy CL4's requirement for major development to be located near to transport interchanges, including railway stations should also increase rail use and reduce car travel and minimise climate change. This concentration of development and improvements at rail stations will improve economic performance, particularly at Crawley Rail Station, which is likely to act as catalyst for retail and commercial development within the town.</p>		
Option 2: To ensure that the four rail stations within the borough are maintained up to the current standards and to seek improvements to the both the accessibility and capacity of rail stations only, without specific reference to Policy CL4 promoting major developments within the vicinity of the rail stations.	<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 and Encourage active lifestyles 	<p style="text-align: center;">+ ? +? 0 ? 0 + +? 0</p>	
	<p>Commentary</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 and minimise climate change. It is uncertain whether the improvement to the rail stations alone will improve economic performance substantially without further developments within the vicinity of the rail stations. Furthermore, it is not necessarily certain that the sustainable improvements to the rail stations could be achieved and it difficult to ascertain, without further development potential around the rail stations, whether the built environment could be improved substantially. 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. It is believed that this policy option will have no significant effect upon creating a healthy and cohesive community.</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.	<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 	<p style="text-align: center;">- +? +? 0 - 0 - ?</p>	

	9. Promote sustainable communities and Encourage active lifestyles	0	
<p>Commentary</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 and minimising climate change, 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 without improvements being made. It is uncertain whether the maintenance of the rail stations and services would even sustain economic performance, 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 and it is unlikely that the built environment could be improved substantially without further improvements to the rail stations. The current provision of rail infrastructure within the borough would not be improved if this option is realised, and furthermore, without further development, only a limited amount contributions for infrastructure could be sought. It is believed that this policy option will have no significant effect upon creating a healthy and cohesive community.</p>			

Policy ST4: Area of Search for a Crawley Western Multi-Modal Transport Link			
Policy Options	SA Objective	Possible Impact	Mitigation of Negative Impacts of Chosen Option
Chosen Option	<p>Option 5: Include a policy in respect of a western link road/multi-modal transport corridor which both identifies an area of search and sets out environmental and other criteria for such a scheme but doesn't identify a specific route or safeguard the land.</p> <p>All options are negative in their overall cumulative impact. The cumulative impact associated with Options 1, 4 and 5 are considered to involve the lowest overall negative impact. Option 5 is narrowly to be preferred on the basis that the benefits arising from it are more certain, and because the nature of the link road as a coherent scheme as distinct from a more passive option involves greater scope to mitigate the negative impacts but allows significant work to still be carried out.</p>		
Option 1: Do not include a policy in respect of a western link road, and seek to address the transport issues associated with economic growth and incremental development within and close to Crawley on the basis of the existing road network, seeking road improvements as necessary to support any such new developments, and such sustainable transport improvements as can be accommodated.	<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 and landscape 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles 	<p style="text-align: center;">+ +? - - - / +? - +</p>	
<p>Commentary</p> <p>This option would reduce the likelihood of existing and increased traffic demand being accommodated by a link road. The demand would instead have to be accommodated on the existing road network, by smaller new improvements and link routes if they can be negotiated and through measures to enable and encourage the use of public transport, walking and cycling. To the extent that this could lead to less use of the private vehicle it would provide benefits in terms of climate change mitigation and adaptation, and encourage more active lifestyles. At the same time, resulting congestion would be likely to make for a less attractive built environment, and the environmental benefits of not identifying a preferred route for a new link road could in some measure be offset by the likelihood that small link roads could be implemented affecting more sensitive areas, including Ifield Brook Meadows LWS, Rusper Road Playing Fields Local Greenspace, and Ifield Village Conservation Area. Further, increased congestion may constrain wider development capacity in the area.</p>			
Option 2: Include a policy in respect of a western link road/multi-modal transport corridor which sets out environmental and	<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 	<p style="text-align: center;">- - ? + +</p>	

other criteria for how such a project should be designed and undertaken, but does not safeguard or identify a specific route.	6. Conserve/enhance biodiversity and landscape	--	
	7. Reduce car journeys	-	
	8. Ensure the provision of sufficient infrastructure	+	
	9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	-	
<p>Commentary To the extent that this option would indicate that a western link road would be acceptable in principle, it would have negative impacts in respect of those objectives which are seeking lower levels of traffic and car use in particular. In facilitating travel by private car it would also work to some degree against the objective of promoting healthier lifestyles through active travel and reduced air pollution. A significant negative arises from the fact that no particular route is promoted, so that a wider range of landscape areas and environmental assets are potentially exposed, with only the criteria listed providing a degree of protection. The positives concerning this option on the other hand relate to its role in providing infrastructure support to housing and employment development.</p>			
Option 3: Include a policy in respect of a western link road which safeguards or identifies a specific route but does not set out environmental and other criteria for how such as project should be designed and undertaken.	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 and landscape	--	
	7. Reduce car journeys	-	
	8. Ensure the provision of sufficient infrastructure	++	
	9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	-	
<p>Commentary To some extent the impacts associated with this option are similar to those for option 2, in so far as the principle of a new link road is supported, with the resulting likely impacts in respect of increased travel by private car, with associated emissions, pollutants, and negatives in relation to public health objectives; as well as the positives in respect of adequate infrastructure for Crawley. The difference between the criteria-based option 2 and the area-based option 3 is considered to be that likely negative environmental impacts are narrowed in terms of their area but widened in terms of their degree, owing to a lack of direction over how a link road should be implemented within the identified area.</p>			
Option 4: Include a policy in respect of a western link road which both safeguards or identifies a route and sets out environmental and other criteria for such a scheme.	1. To minimise climate change	-	This option has various negative impacts requiring mitigation. Investment in public transport and sustainable transport schemes feeding into the road would be required to mitigate the health and environmental impacts associated with traffic using the road. Highways modelling would be required to confirm how this could be best achieved. Landscape impact would need to be mitigated as far as practicable, while biodiversity impacts would need to be accurately identified and provision for net gains ensured.
	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 and landscape	-	
	7. Reduce car journeys	-	
	8. Ensure the provision of sufficient infrastructure	++	
	9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	-	
<p>Commentary In seeking to focus and limit the environmental impact of a link road both in terms of its location and the detailed manner and process of its implementation, this option is considered to involve a lesser negative impact across the sustainability objectives than options 2 and 3, while retaining the benefits of these options in terms of providing adequate infrastructure to support current capacity pressures and growth. At the same time it retains a number of the negative impacts associated with</p>			

	support for a new link road in relation to climate change mitigation and adaptation, traffic growth, impact on biodiversity and landscape, and public health objectives.		
Option 5: Include a policy in respect of a western link road/multi-modal transport corridor which both identifies an area of search and sets out environmental and other criteria for such a scheme but doesn't identify a specific route or safeguard the land.	1. To minimise climate change	-	This option has various negative impacts requiring mitigation. Investment in public transport and sustainable transport schemes feeding into the road would be required to mitigate the health and environmental impacts associated with traffic using the road. Highways modelling would be required to confirm how this could be best achieved. Landscape impact would need to be mitigated as far as practicable, while biodiversity impacts would need to be accurately identified and provision for net gains ensured.
	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 and landscape	-		
7. Reduce car journeys	-		
8. Ensure the provision of sufficient infrastructure	++		
9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	-		
	<p>Commentary</p> <p>In seeking to focus and limit the environmental impact of a link road both in terms of its location and the detailed manner and process of its implementation, this option is considered to involve a lesser negative impact across the SA Objectives than Options 2 and 3, while retaining the benefits of these options in terms of providing adequate infrastructure to support current capacity pressures and growth. At the same time, it retains a number of the negative impacts associated with support for a new link road in relation to climate change mitigation and adaptation, traffic growth, impact on biodiversity and landscape, and public health objectives. This option allows significant work to still be carried out to minimise and mitigate the potential negative impacts.</p>		

APPENDIX I: SUBMISSION LOCAL PLAN SITE ALLOCATIONS AND DESIGNATIONS

Assessment of Deliverable Key Housing Sites (Policy H2)

Site Name: Forge Wood Phase 4B, Pound Hill

Site Potential Allocation: Remaining sub-phase of the wider Forge Wood Neighbourhood masterplan, anticipated to provide 434 dwellings, as part of wider neighbourhood of up to 1,900 homes and associated facilities, infrastructure and employment space.

Site Description: Existing allocation as part of a comprehensive mixed use neighbourhood located to the North of the A2011 within Pound Hill. The site of sub-phase 4B mainly comprises open countryside to the east of Balcombe Road.

Impacts of the Development:

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	Although located within a comparatively remote part of the borough, Phase 4B represents a sustainable location when considered in the context of the Forge Wood Masterplan, which is in the process of being implemented. Neutral Impact (/)
2. Adapt to Climate Change	Phase 4B is not located within a Flood Zone. The development would, however, reduce permeable surfacing and significantly increase hard standing, increasing surface water runoff. The wider masterplan includes suitable proposals for sustainable urban drainage in mitigation. Neutral Impact (/)
3. Protect and/or Enhance the Built Environment	The development comprises a greenfield extension to Crawley as part of a new neighbourhood and would be fundamentally different to the existing character of the site as open countryside and farmland. Development of the site would alter the countryside setting of the locality and setting of existing residential properties close to the site. However, the wider neighbourhood 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 a total of approximately 434 new homes, increasing the capacity of the town to meet some of the need emerging from the population. 40% affordable. Positive Impact (+)
5. Maintain/ Support Employment	The development of the site as housing would make a contribution to the local population and thus the available workforce. Positive Impact (+)
6. Conserve/ Enhance Biodiversity and Landscape	Site is currently open fields with some surrounding structural landscaping. While the structural landscaping will be partly maintained as part of the design and layout of the development, some loss of landscape value is anticipated. This will be mitigated by biodiversity enhancements provided as part of the wider neighbourhood masterplan. Negative Impact (-)
7. Promote Sustainable Journeys	The site is located adjacent to the existing New Town, but is, to some extent, 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	The necessary infrastructure is being provided as part of the wider neighbourhood masterplan. Neutral Impact (/)
9. Promote Sustainable Communities and Encourage Active Lifestyles	The site has a somewhat isolated situation in between the M23 and the Balcombe Road, but the location is made significantly more sustainable by the layout of the wider Forge Wood neighbourhood, with local facilities and pedestrian/cycle connections serving to encourage active lifestyles. Neutral Impact (/)
Conclusions	The site offers the opportunity to provide additional housing to meet the needs of the growing population of Crawley. It is part of a wider neighbourhood allocation which is currently substantially under construction, including new neighbourhood and recreation/sports facilities. These serve to render the development sustainable notwithstanding its relatively isolated situation

SA Objective	Commentary and/or Impact
	within the borough.

Assessment of Deliverable Key Housing Sites (Policy H2)

Site Name: Zurich House, Southgate

Site Potential Allocation: Housing (53 dwellings)

Site Description: The site comprises a vacant office building; a prior approval scheme is currently being implemented.

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	Providing 44 new homes. Increasing the capacity of the town to meet some of the need emerging from the population. No affordable housing due to Prior Approval. 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. Uncertain 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	Necessary infrastructure will be required to be provided as part of the scheme. Neutral Impact (/)
9. Promote Sustainable Communities and Encourage Active Lifestyles	The site is located close to the Town Centre, with good access to schools, public transport and local health facilities. 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 Deliverable Key Housing Sites (Policy H2)

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

Site Potential Allocation: Housing (59 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 a formerly developed parcel of land within the Built-Up Area which has become vacant and overgrown. 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 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. Uncertain 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 Sustainable Communities and Encourage Active Lifestyles	The site is located within walking distance to the Town Centre, with good access to schools, public transport and local health facilities. 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	This is a vacant site within Three Bridges neighbourhood offering good opportunities for high quality residential development in a sustainable location.

Assessment of Deliverable Key Housing Sites (Policy H2)

Site Name: Upper Floors, 7 – 13 The Broadway & 1 – 3 Queens Square, Northgate

Site Potential Allocation: Housing (25 dwellings)/Mixed-Use (ground floor retail/active frontage)

Site Description: Upper Floors within Town Centre site.

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 the Town Centre. 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 the Town Centre. 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 25 new homes in an underused location. 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 an existing brownfield site, the use of the upper floors for residential will have no impact on landscaping or biodiversity. Neutral Impact (/)
7. Promote Sustainable Journeys	The site is located within 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 Sustainable Communities and Encourage Active Lifestyles	The site is located within the Town Centre, with good access to public transport and local health facilities. Possible Positive or Slight Positive Impact (+?)
Conclusions	The site is a brownfield site, offering good opportunities for high quality residential development in a sustainable location.

Assessment of Deliverable Key Housing Sites (Policy H2)

Site Name: Shaw House, Peglar Way, West Green

Site Potential Allocation: Housing (33 dwellings)

Site Description: The site comprises an existing office building; work has been undertaken on site, following a prior approval.

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 the Town Centre. 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	Will offer 33 new homes. Increasing the capacity of the town to meet some of the need emerging from the population. Through the Prior Approval process no consideration has been able to be given to space standards or securing affordable housing. 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. Uncertain Impact (?)
6. Conserve/ Enhance Biodiversity and Landscape	The site is a conversion of an existing office building, being progressed under permitted development rights. Any additional planning permission could secure some enhancements for biodiversity as part of the net gain requirement. Neutral Impact (/)
7. Promote Sustainable Journeys	The site is located within the existing urban area, in a sustainable location to promote public transport use, cycling and walking. Significant Positive Impact (++)
8. Provide Sufficient Infrastructure	As this was progressed through the prior approval process, no contributions have been secured for infrastructure improvements. Uncertain Impact (?)
9. Promote Sustainable Communities and Encourage Active Lifestyles	The site is located within the Town Centre, with good access to public transport and local health facilities. Possible Positive or Slight Positive Impact (+?)
Conclusions	The site is a brownfield site, offering good opportunities for high quality residential development in a sustainable location.

Assessment of Deliverable Key Housing Sites (Policy H2)

Site Name: Longley House, Southgate

Site Potential Allocation: Housing (121 dwellings)

Site Description: The site comprises a partly 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. 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 the town centre boundary, within an area surrounded by the residential neighbourhood. New residential properties would be in-keeping with this 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. Significant 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. 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. Uncertain Impact (?)
6. Conserve/ Enhance Biodiversity and Landscape	The site is currently vacant. Biodiversity enhancements including new landscaping should be designed into any scheme and meet the requirements of 10% net gain. Positive Impact (+)
7. Promote Sustainable Journeys	The site is located within 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 Sustainable Communities and Encourage Active Lifestyles	The site is located within the Town Centre boundary and adjacent to the neighbouring residential area, with good access to public transport, schools and local health facilities. 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 Deliverable Key Housing Sites (Policy H2)

Name: Steers Lane, Forge Wood

Potential Site Allocation: Housing (185 homes)

Description: The site is within the existing allocation for Forge Wood neighbourhood. It is a residual area of land which does not benefit from the outline planning permission for the masterplanned neighbourhood area, but benefits from a separate outline permission (CR/2018/0894/OUT) and reserved matters approval (CR/2020/0548/ARM). Work has commenced on site.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The site is located within the new Forge Wood neighbourhood, although outside the current masterplanned area. However, the site sits within the 57 and 60dB(A) predicted aircraft noise contours for a single runway and between the 60 and 66dB(A) predicted noise contours for a potential southern runway. While already benefiting from planning permission on the basis of the noise requirements detailed in the 2015 Local Plan, the site would not be considered suitable were it to be assessed against the noise policy in the submission 2020 Plan. Significant Negative 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 comprises a largely greenfield extension to the permitted Forge Wood 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. This impact could, however, be mitigated by means of high quality design, layout, and landscaping Neutral Impact (/)
4. Decent/ Affordable Homes	Could offer 185 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. Positive Impact (+)
6. Conserve/ Enhance Biodiversity and Landscape	The 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 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. 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. 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 and Encourage Active Lifestyles	The site would form an extension to a mixed use neighbourhood which comprises a range of related land uses including primary school, doctor's surgery, employment land and located within the built-up area boundary, with access to the neighbourhood centre, schools, and local health facilities. The site would result in the loss of open countryside and informal recreational space. However, development of the site would require new open space and recreation facilities. Significant Positive Impact (++)
Conclusions	The site would offer the opportunity to provide additional housing to meet the needs of the growing population of Crawley and would form part of an existing housing allocation and the new neighbourhood. However, the site is currently within the noise contours for a southern runway at Gatwick Airport and any proposal falling outside of the scope of the extant outline consent would involve the principle of development being reconsidered in light of current local planning policy.

Assessment of Key Housing and Open Space Sites (Policy H2)

Site Name: Tinsley Lane, Three Bridges

Site Potential Allocation: Housing and Open Space (120 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 Infrastructure	The site is located adjacent to the existing residential properties which are served by existing infrastructure services. Uncertain Impact (?)
9. Promote Sustainable Communities and Encourage Active Lifestyles	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. 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). A development brief has been prepared and adopted to provide a greater level of advice on these matters.

Assessment of Key Housing and Open Space Sites (Policy H2)

Site Name: Breezehurst Drive Playing Fields

Site Potential Allocation: Housing and Open Space (85 homes)

Site Description: Existing Playing Fields site: located in Bewbush, close to Dorsten Square.

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. Potential air quality and noise pollution issues due to close proximity to dual carriageway road which will need mitigating through design. Uncertain Impact (?)
2. Adapt to Climate Change	Site is not within flood zone. Would reduce permeable surfacing and create 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. 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 road and 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 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 (++)
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 and Encourage Active Lifestyles	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. 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 Housing, Biodiversity and Heritage Sites (Policy H2)

Site Name: Land East of Street Hill/Balcombe Road, Worth

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. It is a Local Wildlife Site.

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, and within the Key Important Linear Contained View. It immediately abuts an Archaeologically Sensitive Area relating to the Moat and Bishops Lodge/Worth Rectory. Significant Negative Impact (--)
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. Positive Impact (+)
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. 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 Local Wildlife Site 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 Infrastructure	The site is located adjacent to the existing residential area which are served by existing infrastructure services. Uncertain Impact (?)
9. Promote Sustainable Communities and 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 Local Wildlife Site. 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 Local Wildlife Site and heritage assets

including the historic park and garden and the archaeologically sensitive moat.

Assessment of Key Housing for Older People Sites (Policy H2)

Site Name: Oakhurst Grange

Site Potential Allocation: Housing for Older People and those with disabilities

Site Description: the site is located within an established residential area, close to the town centre. Previously used as a care home consisting of 120 beds. The site is currently vacant.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	Close to town centre: sustainable location within the urban area. Brownfield site. Sustainable design and construction will apply to new build. There are no known issues with land contamination or noise, air or water pollution. Significant Positive Impact (++)
2. Adapt to Climate Change	The site is not within an area of identified flood risk. It is currently a brownfield site and would form the reuse of land. Sustainable design and construction and water management measures could improve the drainage and run-off associated with this site. Significant Positive Impact (++)
3. Protect and/or Enhance the Built Environment	The site is located within the built up area. The site is previously developed and its reuse will address a vacant site. Significant Positive Impact (++)
4. Decent/ Affordable Homes	Could offer a proportion of new homes. Increasing the capacity of the town to meet very specific needs for older people emerging from the population either as a care home or as housing designed to adapt to the needs of older people to allow for them to retain independence for longer. Significant Positive Impact (++)
5. Maintain/ Support Employment	The provision of new housing is closely linked to supporting economic growth. The site is located close to the hospital offering good opportunities for care/residential home staff. Positive Impact (+)
6. Conserve/ Enhance Biodiversity and Landscape	Biodiversity enhancements should be designed into any scheme. Positive Impact (+)
7. Promote Sustainable Journeys	The site is located within the urban area, and close to the town centre and the hospital. Positive Impact (+)
8. Provide Sufficient Infrastructure	The site is located adjacent to the existing residential area which are served by existing infrastructure services. Positive Impact (+)
9. Promote Sustainable Communities and Encourage Active Lifestyles	Specific development of the site to meet the needs of Crawley's older people addresses existing shortfalls in this type of provision. The site is located within the urban area, close to the town centre and the hospital. By providing specialised housing provision for older people it will be for the residents to be active and independent in later life. Significantly Positive Impact (++)
Conclusions	The site is located within the built up area, close to amenities within the town centre and health care services. It is a secluded site and offers advantages for its development either as a residential/care home or for the general housing needs of older people.

Assessment of Key Housing for Older People Sites (Policy H2)

Site Name: St. Catherine’s Hospice, Southgate

Site Potential Allocation: Housing for Older People and those with disabilities

Site Description: the site is located within an established residential area, close to the town centre. The site currently includes an existing Hospice which is to be relocated to a new site at Pease Pottage.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	Close to town centre: sustainable location within the urban area. Brownfield site. Sustainable design and construction will apply to new build. There are no known issues with land contamination or noise, air or water pollution. Significant Positive Impact (++)
2. Adapt to Climate Change	The site is not within an area of identified flood risk. It is currently a brownfield site and would form the reuse of land. Sustainable design and construction and water management measures could improve the drainage and run-off associated with this site. Significant Positive Impact (++)
3. Protect and/or Enhance the Built Environment	The site is located within the built up area. The site is previously developed and its reuse will address a vacant site, part of which lies within a Conservation Area so will need appropriate design. Significant Positive Impact (++)
4. Decent/ Affordable Homes	Could offer a proportion of new homes. Increasing the capacity of the town to meet very specific needs for older people emerging from the population either as a care home or as housing designed to adapt to the needs of older people to allow for them to retain independence for longer. Include 40% affordable housing and/or affordable care. Significant Positive Impact (++)
5. Maintain/ Support Employment	The provision of new housing is closely linked to supporting economic growth. Positive Impact (+)
6. Conserve/ Enhance Biodiversity and Landscape	Biodiversity enhancements should be designed into any scheme. Positive Impact (+)
7. Promote Sustainable Journeys	The site is located within the urban area, and close to the town centre. Positive Impact (+)
8. Provide Sufficient Infrastructure	The site is located adjacent to the existing residential area which are served by existing infrastructure services. Positive Impact (+)
9. Promote Sustainable Communities and Encourage Active Lifestyles	Specific development of the site to meet the needs of Crawley’s older people addresses existing shortfalls in this type of provision. The site is located within the urban area, close to the town centre. By providing specialised housing provision for older people it will be for the residents to be active and independent in later life. Significantly Positive Impact (++)
Conclusions	The site is located within the built up area, close to amenities within the town centre and neighbourhood health care services. It is a secluded site and offers advantages for its development either as a residential/care home or for the general housing needs of older people.

Assessment of Housing and Neighbourhood Facilities Sites (Policy H2)

Site Name: The Imperial, Broadfield Barton

Site Potential Allocation: Mixed Use Housing (19 dwellings)

Site Description: The site comprises land incorporating a former public house and one dwelling

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The site represents a sustainable neighbourhood 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 neighbourhood centre and mixed use development would be in keeping with the area. Good quality design could enhance the built environment. Positive Impact (+)
4. Decent/ Affordable Homes	Could offer approximately 19 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, where appropriately located, can support economic growth. A mixed use residential and commercial development would positively promote economic growth. The development of the site must include a drinking establishment and retail uses at ground floor. Significant 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 within 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 anticipated that the necessary infrastructure will be provided as part of the scheme through site specific S106 contributions. Uncertain Impact (?)
9. Promote Sustainable Communities and Encourage Active Lifestyles	The site is located close within the neighbourhood centre, with good access to schools, public transport and local health facilities. Significant Positive Impact (++)
Conclusions	The site is a brownfield site, offering good opportunities for high quality residential/commercial/retail mixed-use development in a sustainable location.

Assessment of Town Centre Key Opportunity Sites (Policies H2 and TC3)

Site Name: Telford Place, Three Bridges

Site Potential Allocation: Main Town Centre Uses or Mixed Use Development for Housing (300 dwellings) and Main Town Centre Uses and/or Town Centre Neighbourhood Facilities

Site Description: A vacant site previously used as a retail showroom and goods depot, currently used as a temporary surface 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. It is located within an Opportunity Area which promotes the development of a district energy network and asks new development to consider the options of linking to or creating a network. Local Plan sustainable design and construction policies will apply. 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. Local Plan environment and sustainability policies would apply. Neutral Impact (/)
3. Protect and/or Enhance the Built Environment	The site is located within the Town Centre and development of this site has significant potential to make positive use of this vacant site, achieve good quality design and active, engaging frontages that could enhance the built environment, and promote town centre vitality and viability. Positive Impact (+)
4. Decent/ Affordable Homes	Site could offer approximately 300 new homes, including 40% affordable, helping to address identified housing needs in a sustainable location. Significant Positive Impact (++)
5. Maintain/ Support Employment	Provision of new housing, where appropriately located, can support 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 brownfield land. 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 with excellent public transport access, as well as cycling and walking links. Development of this site would increase traffic generation, though 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 anticipated 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 and Encourage Active Lifestyles	The site is located within the built-up area boundary, and within the Town Centre, with good access to sustainable transport modes, schools and supporting facilities. The site is located within walking distance to Southgate playing fields and Memorial Gardens, 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 that is appropriate for residential and mixed use development.

Assessment of Town Centre Key Opportunity Sites (Policies H2 and TC3)

Site Name: Crawley Station and Car Parks, Northgate

Site Potential Allocation: Main Town Centre Uses or Mixed Use Development for Housing (308 dwellings) and Main Town Centre Uses and/or Town Centre Neighbourhood Facilities

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 sustainable town centre location. It is located within an Opportunity Area which promotes the development of a district energy network and asks new development to consider the options of linking to or creating a network. Local Plan sustainable design and construction policies will apply. Railway Station improvements will enhance sustainable transport links. 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 a flood zone. Local Plan environment and sustainability policies would apply. Neutral Impact (/)
3. Protect and/or Enhance the Built Environment	The site is located within the Town Centre and development of this site has significant potential to make for a more efficient use of this site, achieve good quality design and active, and engaging frontages that could enhance the built environment and promote town centre vitality and viability. Positive Impact (+)
4. Decent/ Affordable Homes	Site could offer approximately 300 new homes, including 40% affordable, helping to address identified housing needs in a sustainable location. Significant Positive Impact (++)
5. Maintain/ Support Employment	Provision of new housing, where appropriately located, can support 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	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 with excellent public transport access, as well as cycling and walking links. Planning permission for improvements to the railway station perform positively against this objective. Significant Positive Impact (++)
8. Provide Sufficient Infrastructure	As part of the planning application process, it is anticipated that the necessary infrastructure will be provided as part of the scheme through site specific S106 contributions. Extant planning permission will deliver positive improvements to public transport and public realm. Positive Impact (+)
9. Promote Sustainable Communities and Encourage Active Lifestyles	The site is located within the built-up area boundary, and within the Town Centre, with good access to sustainable transport modes, schools and supporting facilities. 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 development in a sustainable location that is appropriate for residential and mixed use development.

Assessment of Town Centre Key Opportunity Sites (Policies H2 and TC3)

Site Name: County Buildings, Northgate

Site Potential Allocation: Main Town Centre Uses or Mixed Use Development for Housing (135 dwellings) and Main Town Centre Uses and/or Town Centre Neighbourhood Facilities

Site Description: The site formerly comprised buildings in the ownership of the county council, in temporary use following the ceasing as the town's library. The existing buildings on the site have been demolished.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The site represents a sustainable town centre location. It is located within an Opportunity Area which promotes the development of a district energy network and asks new development to consider the options of linking to or creating a network. Local Plan sustainable design and construction policies will apply. Positive Impact (+)
2. Adapt to Climate Change	The site is not within a flood zone. Local Plan environment and sustainability policies would apply. 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. Part of the site is identified for its local importance in New Town architecture – the positive elements of this should be retained and incorporated into the design of a high quality scheme. Positive Impact (+)
4. Decent/ Affordable Homes	Could offer approximately 135 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, where appropriately located, can support economic growth. However, the total loss of an employment site within the town centre boundary, and an identified Key Opportunity Site, would have a negative impact. A commercial/main town centre uses and/or mixed use development would positively promote economic growth. The development of the site could provide residential as part of a mixed use scheme for commercial uses. Significant 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 within the Town Centre in a sustainable location with excellent public transport access, as well as cycling and walking links. Significant Positive Impact (++)
8. Provide Sufficient Infrastructure	As part of the planning application process, it is anticipated that the necessary infrastructure will be provided as part of the scheme through site specific S106 contributions. Uncertain Impact (?)
9. Promote Sustainable Communities and Encourage Active Lifestyles	The site is located inside the Town Centre Boundary, with good access to schools, public transport and other facilities. The site is located within walking distance to Southgate and West Green 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/mixed use development in a sustainable location.

Assessment of Town Centre Key Opportunity Sites (Policies H2 and TC3)

Site Name: Land North of the Boulevard, Northgate

Site Potential Allocation: Main Town Centre Uses or Mixed Use Development for Housing (273 dwellings – of which 91 have now been delivered) and Main Town Centre Uses and/or Town Centre Neighbourhood Facilities

Site Description: The site comprises land to the north of the Town Centre’s Primary Shopping Area, currently used for civic (town hall) use.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The site represents a sustainable town centre location. It is located within an Opportunity Area which promotes the development of a district energy network and asks new development to consider the options of linking to or creating a network. Local Plan sustainable design and construction polices will apply. Positive Impact (+)
2. Adapt to Climate Change	The site is not within a flood zone. Local Plan environment and sustainability policies would apply. 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 273 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, where appropriately located, can support economic growth, whilst mixed use development would positively promote economic growth. The development of the site could provide for commercial/retail uses, including at ground floor. Significant 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 within the Town Centre in a sustainable location with excellent public transport access, as well as cycling and walking links. Significant Positive Impact (++)
8. Provide Sufficient Infrastructure	As part of the planning application process, it is anticipated that the necessary infrastructure will be provided as part of the scheme through site specific S106 contributions. Uncertain Impact (?)
9. Promote Sustainable Communities and Encourage Active Lifestyles	The site is located inside the Town Centre Boundary, with good access to schools, public transport and other facilities. The site is located within walking distance to Southgate and West Green Playing Fields, allowing opportunities for informal recreation. Significant Positive Impact (++)
Conclusions	The site is a brownfield site, offering good opportunities for high quality residential development/mixed use development in a sustainable location.

Assessment of Town Centre Key Opportunity Sites (Policies H2 and TC3)

Site Name: Crawley College, Three Bridges

Site Potential Allocation: Education/Main Town Centre Uses/Mixed Use with Housing (363 dwellings)

Site Description: The site comprises two parcels of land within the ownership of Crawley College. One of these is the former car park which is currently under construction for 98 dwellings; the other is the remaining College site which could be available for consolidation, remodelling and masterplanning to provide education-led development and include substantial new housing provision.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The site represents a sustainable town centre location. It is located within an Opportunity Area which promotes the development of a district energy network and asks new development to consider the options of linking to or creating a network. Local Plan sustainable design and construction policies will apply. Positive Impact (+)
2. Adapt to Climate Change	The site is not within a flood zone. Local Plan environment and sustainability policies would apply. 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 500 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, where appropriately located, can support economic growth, whilst mixed use development would positively promote economic growth. Retention and improvement of educational facilities on site can contribute positively to qualifications, learning and skills. Significant 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 within the Town Centre in a sustainable location with excellent public transport access, as well as cycling and walking links. 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 Sustainable Communities and Encourage Active Lifestyles	The site is located inside the Town Centre, with good access to schools, public transport and local health facilities. The site is located within walking distance to Southgate and West Green Playing Fields, allowing opportunities for informal recreation. Significant Positive Impact (++)
Conclusions	The site is a brownfield site, offering good opportunities for high quality residential development/mixed use development including education, in a sustainable location.

Assessment of Town Centre Key Opportunity Sites (Policies H2 and TC3)

Site Name: Cross Keys

Site Potential Allocation: Main Town Centre Uses/Mixed Use with Housing (12 dwellings)

Site Description: The site comprises land between the High Street and the Broadway. It includes a surface carpark, and the site formally identified as The Old Vicarage, Church Walk.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The site represents a sustainable town centre location. It is located within an Opportunity Area which promotes the development of a district energy network and asks new development to consider the options of linking to or creating a network. Local Plan sustainable design and construction policies will apply. 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 a flood zone. Local Plan environment and sustainability policies would apply. 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, but development must be carefully planned given the setting of the listed church. Positive Impact (+)
4. Decent/ Affordable Homes	Could offer approximately 20 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, where appropriately located, can support 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. Significant 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 within the Town Centre in a sustainable location with excellent public transport access, as well as cycling and walking links. Significant Positive Impact (++)
8. Provide Sufficient Infrastructure	As part of the planning application process, it is anticipated that the necessary infrastructure will be provided as part of the scheme through site specific S106 contributions. Uncertain Impact (?)
9. Promote Sustainable Communities and Encourage Active Lifestyles	The site is located close to the Town Centre, with good access to schools, public transport and local facilities. The site is located within walking distance to Southgate and West Green Playing Fields, allowing opportunities for informal recreation. Significant Positive Impact (++)
Conclusions	The site is a brownfield site, offering good opportunities for high quality residential/mixed use development in a sustainable location. However, capacity is constrained to reflect the sensitive amenity of the site and the opportunities for the site's location close to the listed church and to enhance linkages between the High Street and the wider town centre shopping area.

Assessment of Town Centre Key Opportunity Sites (Policies H2 and TC3)

Site Name: MOKA

Site Potential Allocation: Main Town Centre Uses or Mixed Use Development for Housing (152 dwellings) and Main Town Centre Uses and/or Town Centre Neighbourhood Facilities

Site Description: The site comprises a site of nightclub close to Crawley Station within the Town Centre Boundary.

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 air or water pollution. The site is adjacent to the railway and Station Way and so is subject to transport noise issues which would need to be considered as part of the design of a scheme. 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 main town centre uses and/or mixed-use with residential 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 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, whilst mixed use development would positively promote economic growth. The development of the site could provide for commercial/retail uses at ground floor and must provide active frontages. Positive or Significant 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 Sustainable Communities and Encourage Active Lifestyles	The site is located inside the Town Centre boundary, with good access to schools, public transport and local facilities. The site is located within walking distance to Southgate and West Green Playing Fields, and Memorial Gardens allowing opportunities for informal recreation. Significant Positive Impact (++)
Conclusions	The site is a brownfield site, offering good opportunities for high quality residential/mixed use development in a sustainable location.

Assessment of Developable Key Housing Sites (Policy H2)

Site Name: Land Adjacent to Sutherland House, Russell Way, Three Bridges

Site Potential Allocation: Housing (30 dwellings)

Site Description: The site falls within the curtilage of an former office building which has recently been converted into residential dwellings under a prior approval scheme. The proposed site takes advantage of some additional capacity for new build within the larger site.

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 30 new homes. Increasing the capacity of the town to meet some of the need emerging from the population. 40% affordable on new build element. Significant Positive Impact (++)
5. Maintain/ Support Employment	Provision of new housing is closely linked to supporting economic growth. Since the wider site has already been converted to residential use the principle of residential use (and the associated loss of employment land) is considered to have been established. Positive Impact (+)
6. Conserve/ Enhance Biodiversity and Landscape	An additional planning permission could secure some enhancements for biodiversity as part of the net gain requirement. 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 Sustainable Communities and Encourage Active Lifestyles	The site is located within walking distance to the Town Centre, with good access to schools, public transport and local health facilities. 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 Developable Key Housing Site (Policy H2)

Name: Land to the southeast of Heathy Farm, Balcombe Road, Forge Wood

Potential Site Allocation: Housing (188 homes)

Description: Existing allocation as part of the Forge Wood Neighbourhood. The site comprised a residual area of land which is not part of the neighbourhood masterplan and outline planning permission.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	Following completion of the Forge Wood neighbourhood, this site would be located within a comprehensive mixed use neighbourhood, benefiting from a neighbourhood centre, local employment, primary school and doctor's surgery. Sustainable design and construction. The site may be affected by noise pollution from transport sources, particularly from Crawley Avenue (A2011), M23, and Junction 10. 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. 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 approximately 188 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. Positive Impact (+)
6. Conserve/ Enhance Biodiversity and Landscape	The site is 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. 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 in to any scheme. Ancient woodland is located to the south of this site – a buffer zone would need to be included in the design and layout of a suitable scheme and this must be advised by an appropriate ecological assessment. Possible Positive or Slight Positive Impact (+?)
7. Promote Sustainable Journeys	The site is located within the Built-Up Area Boundary. 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 and Encourage Active	This site would be developed as part of a mixed use neighbourhood which comprises a range of related land uses including a neighbourhood centre, primary school, employment land and located within the built-up area boundary, adjacent to the existing Pound Hill Neighbourhood. The site would result in the loss of open countryside and informal recreational space. However, the remainder of Forge Wood neighbourhood development provides for large areas of planned open space including locally equipped areas of play, playing fields and

SA Objective	Commentary and/or Impact
Lifestyles	cycle routes. It is considered the approved layout and design of the new neighbourhood will fully encourage active lifestyles. Development of this site should also support new infrastructure and open space/recreation provision, including onsite allotment provision. Significant Positive Impact (++)
Conclusions	The site offers the opportunity to provide additional housing to meet the needs of the growing population of Crawley. It forms part of an existing housing allocation and the new neighbourhood.

Assessment of Developable Key Housing Sites (Policy H2)

Site Name: Land adjacent to Desmond Anderson School, Tilgate

Site Potential Allocation: Housing (205 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 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. 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 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 and Encourage Active Lifestyles	The site is located within the built-up area boundary, close to the neighbourhood centre, schools, and local health facilities. 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 Broad Locations for Housing Development (Policy H2)

Name: Town Centre (land outside the allocated H2/TC3 Sites)

Potential Site Designation: Broad Location for Housing (130 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 area 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 area 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 112 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 sites could provide for commercial/retail uses at ground floor and would need to provide active frontages. 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. Uncertain/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 area is located within 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 number of schemes proposed either through site specific S106 contributions or CIL contributions. Uncertain Impact (?)
9. Promote Sustainable Communities and Encourage Active Lifestyles	The area is located within the Town Centre, with good access to public transport. The sites are located within walking distance to Southgate and West Green Playing Fields, allowing opportunities for informal recreation. The sites are 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, Northgate

Potential Site Designation: Broad Location for Housing (92 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 include residential properties with garden land and a petrol filling station.

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 area 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 area 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 92 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. 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 area 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 number of schemes proposed either through site specific S106 contributions or CIL contributions. Uncertain Impact (?)
9. Promote Sustainable Communities and Encourage Active Lifestyles	The area is located within walking distance of the Town Centre, with good access to schools, public transport and local health facilities. The sites are located within walking distance to Northgate Playing Fields, allowing substantial opportunities for informal recreation. The sites are 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 for Housing

Name: Land north of Langley Walk

Potential Site Designation: Area of Search for Housing

Description: The site is located outside the Built-Up Area Boundary and falls within the Upper Mole Farmlands Rural Fringe countryside character area, although outside of safeguarding. The land is located to the east of Fir Tree Close and the rejected housing site 'Land Adjacent to Langley Walk and Burlands (incorporating Willoughby House)'. It is directly to the north of Langley Walk and is owned wholly by the council. It includes the SHLAA site Langley Green Farm as well as the adjacent Greylands site. 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. However, the majority of the site is located within the 60dBA noise contour for a second runway at Gatwick Airport and therefore unacceptable for residential use based on the currently predicted contours. The unconstrained area from a noise perspective is therefore confined to the southernmost portion, although this constraint would be removed in the event of safeguarding for an additional southern runway being lifted. The site may also be affected by the potential route of a new link road between the A264 and A23. There is an existing access onto the land but this will need to be assessed and most likely improved, potentially as part of the alignment and design of a new link road. 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	The provision of new housing is linked to supporting economic growth. Any future development on the site may have small economic benefits since the occupants would contribute towards local community businesses. Positive 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 Local Wildlife Site. 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 (?)

SA Objective	Commentary and/or Impact
9. Promote Sustainable Communities and Encourage Active Lifestyles	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. 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. 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 currently mainly within the predicted noise contours for a potential southern runway at Gatwick Airport. Other issues which would need to be addressed include flooding and transport.

Assessment of Rejected Housing Sites

Name: International Business Centre, Spindle Way

Potential Site Designation: Housing

Description: The site is currently in office use and is located on the Spindle Way industrial estate which forms part of the wider Three Bridges Corridor Main Employment Area.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	Although the immediate vicinity of the site is mainly occupied by industrial and other employment uses, the wider location is sustainable, being between Three Bridges station to the east, Crawley Town Centre and railway station to the west, and nearby neighbourhood facilities in Three Bridges to the north. This would reduce the need to travel by car. 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. Haslett Avenue East immediately to the north also provides good pedestrian, cycling and bus connections. The site would need to be assessed for contamination in the event of ground works being proposed. Neutral Impact (/)
2. Adapt to Climate Change	The risk of flooding at the site is low. Given the existing character of the site it is unlikely that development would result in an increase in areas of hardstanding. Neutral Impact (/)
3. Protect and/or Enhance the Built Environment	The vicinity of the site is mainly occupied by commercial and industrial buildings with a functional appearance, so the sensitivity of the area to change is low. Neutral Impact (/)
4. Decent/ Affordable Homes	Residential development of this site would make some contribution towards meeting local housing need. However, residential is a sensitive use, and future residents would likely be negatively affected by disturbance from existing or future employment uses. Therefore, it is not considered appropriate nor sustainable for residential development to be located at this site. Significant Negative Impact (--)
5. Maintain/ Support Employment	The site is situated within a designated Main Employment Area, and in a particular location where industrial, storage and distribution uses play a significant role, generating large numbers of vehicular movements. These activities would not sit well alongside residential use and as such the introduction of housing in this location would have a negative impact on the function of the Main Employment Area. Significant Negative Impact (--)
6. Conserve/ Enhance Biodiversity and Landscape	The area is not sensitive in terms of biodiversity or landscape and development at this location could occur without harm to these values. Neutral Impact (/)
7. Promote Sustainable Journeys	Although the immediate vicinity is dominated by vehicular traffic associated with the business functions of the area, the wider location is sustainable, with access to walking and cycling networks, public transport and town centre facilities. Neutral Impact (/)
8. Provide Sufficient Infrastructure	Residential use at the site is unlikely to have a greater impact on highways infrastructure than the existing office use. Residential development would add to cumulative demands on infrastructure in the wider vicinity but these impacts could be mitigated. Neutral Impact (/)
9. Promote Sustainable Communities and Encourage Active	The wider location of the site offers good access to facilities (including leisure/sports facilities) and onward connections within walking or cycling distance, although this is offset by the immediate context of the surrounding business uses, which generate significant vehicular traffic, potentially discouraging active travel and social participation. Neutral Impact (/)

SA Objective	Commentary and/or Impact
Lifestyles	
Conclusions	The location of the site within a Main Employment Area where traffic-heavy industrial and distribution uses tend to predominate renders it unsuitable for residential development, in spite of the relative sustainability of the wider location.

Assessment of Rejected Housing Sites

Name: Land adjacent to Langley Green Walk and Burlands (incorporating Willoughby House)

Potential Site Designation: Housing

Description: The site is located outside the Built-Up Area Boundary and falls within the Upper Mole Farmlands Rural Fringe countryside character area, although outside of safeguarding. The land is located to the west of Fir Tree Close and the 'Land North of Langley Walk' potential area of search for housing. It lies directly to the north of Langley Walk and is owned wholly by the council. Vehicle access onto the land currently exists from Langley Walk.

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. However, the site is mostly located within the 60dBA noise contour for a new southern runway at Gatwick Airport and is therefore unacceptable for residential use based on the currently predicted contours. The site is unlikely to be contaminated, although this will also need to be assessed on site. Potential Negative Impact (-?)
2. Adapt to Climate Change	Whilst the site is not within a floodplain, 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 includes the Listed Langley Grange, the setting of which would likely be affected by residential development on the site. Development would also affect the setting of adjacent residential areas, although these are less visually sensitive. These impacts could be minimised by suitable layout, design, screening and landscaping of the site. Potential Negative Impact (-?)
4. Decent/ Affordable Homes	Residential development of this site would contribute towards meeting local housing need. However, residential is a sensitive use, and future residents across most of the site would be exposed to unacceptable levels of aviation noise in the event of an additional southern runway being created at Gatwick Airport. Therefore, it is not considered appropriate nor sustainable for residential development to be located at this site. Potential Negative Impact (-?)
5. Maintain/ Support Employment	The provision of new housing is linked to supporting economic growth. Any future development on the site may have small economic benefits since the occupants would contribute towards local community businesses. Positive Impact (+)
6. Conserve/ Enhance Biodiversity and Landscape	The site falls outside the BUAB within the Upper Mole Farmlands Rural Fringe countryside character and residential development would likely have some at least some negative landscape impact, albeit that this could be limited by suitable design and layout. Potential impacts on the nearby Willoughby Fields Local Nature Reserve and associated Local Wildlife Site would also need to be considered. Negative 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 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 and Encourage Active Lifestyles	The site is adjacent to an established residential neighbourhood and offers good access to neighbourhood facilities and walking and cycling networks. Positive Impact (+)
Conclusions	The exposure of the site to unacceptable noise levels in the event of a new southern runway being created at Gatwick Airport makes it

SA Objective	Commentary and/or Impact
	unacceptable for residential development. In the event of safeguarding for a new runway being lifted it may be suitable, subject to appropriate access and mitigation of highways, heritage, landscape, biodiversity and infrastructure impacts.

Assessment of Rejected Housing Sites

Name: Land North of Tilgate Forest Business Centre

Potential Site Designation: Housing

Description: The site occupies vacant industrial land falling within the Tilgate Forest Business Centre Main Employment Area. It is within Tilgate Neighbourhood but isolated from the main neighbourhood area by Tilgate Park.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The site does not represent a sustainable location for residential development, being isolated from neighbourhood facilities in Tilgate by Tilgate Park, and from those in Broadfield by the A23. The adjacent dual carriageway meanwhile does not represent an attractive route for cycling or walking. Residential development in this location would be expected to be highly car dependent. The site is also exposed to noise, particularly from the A23. Significant Negative Impact (--)
2. Adapt to Climate Change	The site is located within Flood Zone 1 and flooding is not considered a significant concern, although the potential impact of any extension of hardstanding would need to be considered. Neutral Impact (/)
3. Protect and/or Enhance the Built Environment	The character and function of the surrounding vicinity as a business centre, mainly in office use, means that the adjacent built form is not highly visually sensitive and it ought to be possible to avoid negative impact through suitable design. Neutral Impact (/)
4. Decent/ Affordable Homes	Development on this site would contribute towards meeting housing needs, although it may be difficult to achieve an acceptable standard of living accommodation owing to noise issues and proximity to neighbouring business uses. Potential Positive Impact (+?)
5. Maintain/ Support Employment	Residential development in this location would be expected to have a negative impact on the economic function of the Main Employment Area. Significant Negative Impact (--)
6. Conserve/ Enhance Biodiversity and Landscape	The site is adjacent to Ancient Woodland, the Tilgate Park SNCI and Biodiversity Opportunity Area, and impacts on these would need to be considered and mitigated. Potential Negative Impact (-?)
7. Promote Sustainable Journeys	The site is isolated from Crawley's existing residential neighbourhoods and associated facilities. Its location alongside a dual carriageway provides poor connectivity to walking and cycling networks, making for a highly car-dependent situation. Significant Negative Impact (--)
8. Provide Sufficient Infrastructure	Highways impacts are likely to be comparable to those associated with alternative business uses of the land, although other infrastructure issues (education, health, open space) would need to be assessed and addressed. Uncertain Impact (+?)
9. Promote Sustainable Communities and Encourage Active Lifestyles	Owing to issues of isolation from facilities and active travel networks, and questions around the quality of living accommodation, residential development at this location would be contrary to the principle of sustainable communities. Significant Negative Impact (--)
Conclusions	The site is part of a business park accessed from a dual carriageway, isolated from other inhabited parts of the borough, and exposed to impacts on the quality of living environment from highway noise and neighbouring uses. For numerous reasons associated with this situation it is unsuitable for residential development.

Assessment of Rejected Housing Sites

Name: East of Brighton Road

Site Potential Allocation: 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 CL8. 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.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The area is heavily wooded and is a Local Wildlife Site 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 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 (++)
5. Maintain/ Support Employment	Whilst the provision of housing is closely linked to economic growth, the allocation of this site for housing is less likely to support employment provision (other than through the construction of the development) because the site is more distant from local community businesses. Uncertain/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 area of Structural Landscaping, and the area is designated as a Local Wildlife Site 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 (?)

SA Objective	Commentary and/or Impact
9. Promote Sustainable Communities and Encourage Active Lifestyles	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. 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 Housing Sites

Name: Tilgate Country Park

Site Potential Allocation: Housing

Description: Countryside location. Greenfield. South of the borough, adjacent to Tilgate, Furnace Green and Maidenbower neighbourhoods abutting the M23. Land in council ownership. Tilgate Park is 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 CL8, 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 a Local Wildlife Site 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 CL7, 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 (--)
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	Whilst the provision of housing is closely linked to economic growth, the allocation of this site for housing is less likely to support employment provision (other than through the construction of the development) because the site is more distant from local community businesses Uncertain/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 a Local Wildlife Site 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	The northern and eastern parts of Tilgate Country Park are adjacent to the Tilgate, Furnace Green and Maidenbower neighbourhoods so

SA Objective	Commentary and/or Impact
Sustainable Journeys	some areas of the site could be accessible to local facilities on foot, or cycle. A bus route also runs through the northern edge of the Park. However, 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 and Encourage Active Lifestyles	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 public open 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. Tilgate Country Park is the most important outdoor recreational asset 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 and recreational assets in the borough.

Assessment of Rejected Housing Sites

Site Name: Stephenson Way Industrial Area: Site 1

Site Potential Allocation: Housing

Site Description: Previously developed land within the urban area. Located within the Three Bridges Corridor Main Employment Area.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	Land contamination and remediation issues likely. The site is also likely to be affected by noise from business and transport sources. Uncertain Impact (?)
2. Adapt to Climate Change	The site falls within the functional floodplain (Flood Zones 2 and 3) but is already hard surfaced. 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	This site 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. However, residential is a sensitive use, and future residents would likely be negatively affected by disturbance from existing or future employment uses. Therefore, it is not considered appropriate nor sustainable for residential development to be located at this site. Significant Negative 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 indicates a need for the retention of the employment land within the main employment areas. The introduction of sensitive uses such as residential would constrain the operation of existing and future employment uses, undermining the economic function of the Main Employment Area. Significant Negative Impact (--)
6. Conserve/ Enhance Biodiversity and Landscape	The site is industrial in nature. Remediation of the site and improvements for residential may be able to enhance biodiversity in this location. Uncertain Impact (?)
7. Promote Sustainable Journeys	The site is located within the urban area, close to Three Bridges Station and Three Bridges Neighbourhood Centre in a sustainable location to promote public transport use, cycling and walking. Significant Positive Impact (++)
8. Provide Sufficient Infrastructure	The site is currently served by existing infrastructure services. 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 (?)
9. Promote Sustainable Communities and Encourage Active Lifestyles	The site is within a designated Main Employment Area, rather than an established residential area. It is relatively 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 (?)
Conclusions	The loss of the employment land within one of the town's designated Main Employment Areas would be contrary to the evidence provided by the EGA. It would undermine the economic function of the designated Main Employment Area and would fundamentally worsen Crawley's already constrained employment land supply position.

Assessment of Rejected Housing Sites

Site Name: Stephenson Way Industrial Area: Site 2

Site Potential Allocation: Housing

Site Description: Previously developed land within the urban area. Located within the Three Bridges Corridor Main Employment Area.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	Land contamination and remediation issues likely. The site is also likely to be affected by noise from business and transport sources. Uncertain Impact (?)
2. Adapt to Climate Change	The site falls within the functional floodplain (Flood Zones 2 and 3) but is already hard surfaced. 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	This site 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. However, residential is a sensitive use, and future residents would likely be negatively affected by disturbance from existing or future employment uses. Therefore, it is not considered appropriate nor sustainable for residential development to be located at this site. Significant Negative 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. The introduction of sensitive uses such as residential would constrain the operation of existing and future employment uses, undermining the economic function of the Main Employment Area. Significant Negative Impact (--)
6. Conserve/ Enhance Biodiversity and Landscape	The site is industrial in nature. Remediation of the site and improvements for residential may be able to enhance biodiversity in this location. Uncertain Impact (?)
7. Promote Sustainable Journeys	The site is located within the urban area, close to Three Bridges Station and Three Bridges Neighbourhood Centre in a sustainable location to promote public transport use, cycling and walking. Significant Positive Impact (++)
8. Provide Sufficient Infrastructure	The site is currently served by existing infrastructure services. 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 (?)
9. Promote Sustainable Communities and Encourage Active Lifestyles	The site is within a designated Main Employment Area, rather than an established residential area. It is relatively 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 (?)
Conclusions	The loss of the employment land within one of the town's designated Main Employment Areas would be contrary to the evidence provided by the EGA. It would undermine the economic function of the designated Main Employment Area and would fundamentally worsen Crawley's already constrained employment land supply position.

Assessment of Rejected Housing Sites

Site Name: Stephenson Way Industrial Area: Site 3

Site Potential Allocation: Housing

Site Description: Previously developed land within the urban area. Located within the Three Bridges Corridor Main Employment Area.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	Land contamination and remediation issues likely. The site is also likely to be affected by noise from business and transport sources. Uncertain Impact (?)
2. Adapt to Climate Change	The site falls within the functional floodplain (Flood Zones 2 and 3) but is already hard surfaced. 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	This site 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. However, residential is a sensitive use, and future residents would likely be negatively affected by disturbance from existing or future employment uses. Therefore, it is not considered appropriate nor sustainable for residential development to be located at this site. Significant Negative 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. The introduction of sensitive uses such as residential would constrain the operation of existing and future employment uses, undermining the economic function of the Main Employment Area. Significant Negative Impact (--)
6. Conserve/ Enhance Biodiversity and Landscape	The site is industrial in nature. Remediation of the site and improvements for residential may be able to enhance biodiversity in this location. Uncertain Impact (?)
7. Promote Sustainable Journeys	The site is located within the urban area, close to Three Bridges Station and Three Bridges Neighbourhood Centre in a sustainable location to promote public transport use, cycling and walking. Significant Positive Impact (++)
8. Provide Sufficient Infrastructure	The site is currently served by existing infrastructure services. 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 (?)
9. Promote Sustainable Communities and Encourage Active Lifestyles	The site is within a designated Main Employment Area, rather than an established residential area. It is relatively 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 (?)
Conclusions	The loss of the employment land within one of the town's designated Main Employment Areas would be contrary to the evidence provided by the EGA. It would undermine the economic function of the designated Main Employment Area, and would fundamentally worsen Crawley's already constrained employment land supply position.

Assessment of Rejected Housing 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 the Three Bridges Corridor Main Employment Area.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	Land contamination and remediation issues likely. The site is also likely to be affected by noise from business and transport sources. Uncertain Impact (?)
2. Adapt to Climate Change	The site falls within the functional floodplain (Flood Zones 2 and 3) but is already hard surfaced. 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	This site 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. However, residential is a sensitive use, and future residents would likely be negatively affected by disturbance from existing or future employment uses. Therefore, it is not considered appropriate nor sustainable for residential development to be located at this site. Significant Negative 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. The introduction of sensitive uses such as residential would constrain the operation of existing and future employment uses, undermining the economic function of the Main Employment Area. Significant Negative Impact (--)
6. Conserve/ Enhance Biodiversity and Landscape	The site is industrial in nature. Remediation of the site and improvements for residential may be able to enhance biodiversity in this location. Uncertain Impact (?)
7. Promote Sustainable Journeys	The site is located within the urban area, close to Three Bridges Station and Three Bridges Neighbourhood Centre in a sustainable location to promote public transport use, cycling and walking. Significant Positive Impact (++)
8. Provide Sufficient Infrastructure	The site is currently served by existing infrastructure services. 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 (?)
9. Promote Sustainable Communities and Encourage Active Lifestyles	The site is within a designated Main Employment Area, rather than an established residential area. It is relatively 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 (?)
Conclusions	The loss of the employment land within one of the town's designated Main Employment Areas would be contrary to the evidence provided by the EGA. It would undermine the economic function of the designated Main Employment Area and would fundamentally worsen Crawley's already constrained employment land supply position.

Assessment of Rejected Housing 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 site would be located within the noise contours associated with a single as well as a potential southern 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	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. Any future development on the site may have small economic benefits since the occupants would contribute towards local community businesses. 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. However, detailed access to the site and parking issues are currently unknown. Uncertain Impact (?)
8. Provide Sufficient Infrastructure	The site is located adjacent to the existing residential properties which are served by existing infrastructure services. Uncertain Impact (?)
9. Promote Sustainable Communities and Encourage Active Lifestyles	The site is adjacent to an established residential area. Vehicular access to the site is currently considered to be limited. 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 fair quality with a high value. Significant Negative Impact (--)
Conclusions	The site lies within the predicted noise contours for a potential southern runway. Therefore, it would not be appropriate to develop at this stage. The results of the 2020 open space study show existing and future deficit for some types of open space provision within Langley Green neighbourhood and identifies this site as having a high value and potential to improve its quality. This 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 Housing 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 single as well as a potential southern 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, 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 land safeguarded for a potential future southern runway for Gatwick Airport. Uncertain 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 Sustainable Communities and Encourage Active Lifestyles	The site is located away from the existing established residential area with limited access to facilities and services. Significant Negative Impact (--)
Conclusions	The site lies within the area safeguarded for a potential future southern runway at Gatwick Airport, and within the noise contours for a second runway. Therefore, it would not be appropriate to develop at this stage. In addition, the site is disconnected from the residential area.

Assessment of Rejected Housing 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 western boundary of 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. Significant 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 the provision 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. Any future development on the site may have small economic benefits since the occupants would contribute towards local community businesses. 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 Sustainable Communities and Encourage Active Lifestyles	Access to the site is constrained. 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. Positive Impact (+)
Conclusions	Part of the site is greenfield land within the functional floodplain (zone 3b). Therefore, these areas within the site would not be appropriate to develop. Land outside this would need to be carefully designed to ensure there is no increase in surface water run-off from the site. Access constraints would need to be addressed and low density sensitive design in keeping with the Area of Special Local Character to the front would be necessary.

Assessment of Rejected Housing Sites

Site Name: Ifield Brook Meadows/Ifield Playing Fields

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. Any future development on the site may have small economic benefits since the occupants would contribute towards local community businesses. 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 Local Wildlife Site and contains an area of ancient woodland. 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 Sustainable Communities and Encourage Active Lifestyles	The site is a designated Local Green Space. 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 is designated as a Local Green Space for its recreation, visual amenity, tranquillity, wildlife, heritage and countryside access value. The site lies within the functional floodplain (zone 3b) and a Local Wildlife Site, and partially within a Conservation Area. Therefore, it would not be appropriate to develop.

Assessment of Rejected Housing Sites

Site Name: Land East of Balcombe Road, North of Forge Wood

Site Potential Allocation: Housing

Site Description: the site is located beyond the Built-Up Area boundary immediately to the north of Forge Wood, 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 potential southern 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	The provision of new housing is linked to supporting economic growth. Any future development on the site may have small economic benefits since the occupants would contribute towards local community businesses. However, part of the site is located within land safeguarded for a potential future southern runway at Gatwick Airport as it may be needed for road diversions. Uncertain 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 Forge Wood neighbourhood reduces this distance. Uncertain Impact (?)
9. Promote Sustainable Communities and Encourage Active Lifestyles	The site is currently located away from the existing established residential area. However, the development of Forge Wood neighbourhood reduces this distance. Uncertain Impact (?)
Conclusions	The site lies within the existing noise contours for the airport, as well as the predicted noise contours for a potential future southern runway. Therefore, it would not be appropriate to develop for housing. In addition, the site is within the countryside, outside the built up area boundary, and part of it is within land safeguarded for a potential future southern runway at Gatwick Airport. It is also currently disconnected from the residential area.

Assessment of Rejected Housing Sites

Site Name: Gas Holder Site

Site Potential Allocation: Housing

Site Description: the site is located within the new Forge Wood neighbourhood.

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 entirely within Flood Zone 3a and partly within the functional floodplain, 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 Forge Wood 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. Any future development on the site may have small economic benefits since the occupants would contribute towards local community businesses. 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 associated new infrastructure services. Uncertain Impact (?)
9. Promote Sustainable Communities and 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 Rejected Housing Sites

Site Name: Land East of East Wing, Burstow Hall, Antlands Lane

Site Potential Allocation: Housing

Site Description: the site is located to the east of Gatwick Airport.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The site is located within the unacceptable noise contours from Gatwick Airport, both existing and potential southern runway, and would result in the exposure of future residents to unacceptable levels of noise from aircraft. Significant Negative Impact (--)
2. Adapt to Climate Change	Unknown Impact (?)
3. Protect and/or Enhance the Built Environment	The site is located outside the Built Up Area Boundary. Uncertain Impact (?)
4. Decent/ Affordable Homes	Could offer 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. However, the site lies immediately south of the Strategic Employment Allocation for industrial and warehouse uses and further residential use may constrain future employment uses in this area. It is also located within land safeguarded for a potential future southern runway at Gatwick Airport as it may be needed for road diversions, and is also separate from the main residential areas of the borough. Uncertain Impact (?)
6. Conserve/ Enhance Biodiversity and Landscape	The site is located outside the Built Up Area Boundary within the North East Crawley Rural Fringe character area. Significant Negative Impact (--)
7. Promote Sustainable Journeys	The site is located outside the Built Up Area Boundary away from existing sustainable transport connections and neighbourhood facilities and services. Significant Negative Impact (--)
8. Provide Sufficient Infrastructure	The provision of sufficient infrastructure would be necessary to meet the needs of the development. Uncertain Impact (?)
9. Promote Sustainable Communities and Encourage Active Lifestyles	The site is located outside the Built Up Area Boundary away from existing neighbourhood facilities and services. Significant Negative Impact (--)
Conclusions	The site is located outside the Built Up Area Boundary within an identified rural area. The exposure of future residents to unacceptable levels of noise from aircraft would be contrary to Environmental Health evidence and harmful to public health. It is also within land safeguarded for a potential future southern runway at Gatwick Airport.

Assessment of Rejected Housing Sites

Site Name: Saxon House, Stephenson Way, Three Bridges

Site Potential Allocation: Housing

Site Description: the site comprises an existing office building.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The site is subject to significant noise constraints. Significant Negative 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 urban area. 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. However, this site is within a Main Employment Area which has been identified for its importance in meeting the economic growth needs of the borough. Significant Negative Impact (--)
6. Conserve/ Enhance Biodiversity and Landscape	Unknown Impact (?)
7. Promote Sustainable Journeys	The site is located within the urban area in a sustainable location close to Three Bridges Station. Significant Positive Impact (++)
8. Provide Sufficient Infrastructure	The site is located within the existing neighbourhood which will be served by existing infrastructure services. Uncertain Impact (?)
9. Promote Sustainable Communities and Encourage Active Lifestyles	The site would be located within a Main Employment Area which is not laid out for residential uses and experiences noise associated with neighbouring commercial uses and traffic generation. Significant Negative Impact (--)
Conclusions	The site is likely to be significantly constrained by flood risk and the noise and traffic associated with the neighbouring commercial uses. The site is within a Main Employment Area and its change of use to residential would impact negatively on the functioning of the wider main employment area. The site is valuable for its commercial use to support the economic growth needs of the borough.

Assessment of Rejected Housing Sites

Site Name: Kingston House, Stephenson Way, Three Bridges

Site Potential Allocation: Housing

Site Description: the site comprises an existing office building.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The site is subject to significant noise constraints. Significant Negative 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 urban area. 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. However, this site is within a Main Employment Area which has been identified for its importance in meeting the economic growth needs of the borough. Significant Negative Impact (--)
6. Conserve/ Enhance Biodiversity and Landscape	Unknown Impact (?)
7. Promote Sustainable Journeys	The site is located within the urban area in a sustainable location close to Three Bridges Station. Significant Positive Impact (++)
8. Provide Sufficient Infrastructure	The site is located within the existing neighbourhood which will be served by existing infrastructure services. Uncertain Impact (?)
9. Promote Sustainable Communities and Encourage Active Lifestyles	The site would be located within a Main Employment Area which is not laid out for residential uses and experiences noise associated with neighbouring commercial uses and traffic generation. Significant Negative Impact (--)
Conclusions	The site is likely to be significantly constrained by flood risk and the noise and traffic associated with the neighbouring commercial uses. The site is within a Main Employment Area and its change of use to residential would impact negatively on the functioning of the wider main employment area. The site is valuable for its commercial use to support the economic growth needs of the borough.

Assessment of Rejected Housing Sites

Site Name: 2 – 4 Grattons Drive

Site Potential Allocation: Housing

Site Description: the site comprises two detached properties in large plots.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	Unknown Impact (?)
2. Adapt to Climate Change	Unknown Impact (?)
3. Protect and/or Enhance the Built Environment	The site is located within an Area of Special Local Character, characterised by larger detached homes and identified for its particular character in terms of density, landscaping and appearance. Significant Negative 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. Any future development on the site may have small economic benefits since the occupants would contribute towards local community businesses. Positive Impact (+)
6. Conserve/ Enhance Biodiversity and Landscape	The site has a number of trees within it protected by Tree Preservation Orders that limit development potential. Significant Negative Impact (--)
7. Promote Sustainable Journeys	The site is located within the urban area in a reasonably sustainable location. Positive Impact (+)
8. Provide Sufficient Infrastructure	The site is located within the existing neighbourhood which will be served by existing infrastructure services. Uncertain Impact (?)
9. Promote Sustainable Communities and Encourage Active Lifestyles	The site would be located within an existing neighbourhood area. Positive Impact (+)
Conclusions	The limited area of developable land within the site arising from the Tree Preservation Orders and its location within the Area of Special Local Character means this site is unsuitable for intensification.

Assessment of Rejected Housing Sites

Site Name: 35 – 37 Goffs Park Road

Site Potential Allocation: Housing

Site Description: the site comprises two detached dwelling houses and gardens.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	Unknown Impact (?)
2. Adapt to Climate Change	Unknown Impact (?)
3. Protect and/or Enhance the Built Environment	The site is located within an Area of Special Local Character, characterised by larger detached homes and identified for its particular character in terms of density, landscaping and appearance. Significant Negative 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. Any future development on the site may have small economic benefits since the occupants would contribute towards local community businesses. Positive Impact (+)
6. Conserve/ Enhance Biodiversity and Landscape	The site has a number of trees across the front boundary within the site protected by Tree Preservation Orders that limit development potential. Significant Negative Impact (--)
7. Promote Sustainable Journeys	The site is located within the urban area in a sustainable location. Positive Impact (+)
8. Provide Sufficient Infrastructure	The site is located within the existing neighbourhood which will be served by existing infrastructure services. Uncertain Impact (?)
9. Promote Sustainable Communities and Encourage Active Lifestyles	The site would be located within an existing neighbourhood area. Positive Impact (+)
Conclusions	The location within the Area of Special Local Character means this site is unsuitable for intensification.

Assessment of Rejected Housing Sites

Site Name: Station Hill, Pound Hill

Site Potential Allocation: Housing

Site Description: the site comprises undeveloped land forming part of railway embankment.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The site is immediately adjacent to the railway line and train station and so subject to unacceptable levels of noise. Significant Negative Impact (--)
2. Adapt to Climate Change	Unknown Impact (?)
3. Protect and/or Enhance the Built Environment	The site forms part of the railway embankment and is well vegetated. Development would remove much of this and the site would be affected by overshadowing of remaining vegetation. The site is very limited and would result in cramped. Significant Negative 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. Any future development on the site may have small economic benefits since the occupants would contribute towards local community businesses. However, it is not clear that the land is not required for the safe operation of the railway, and the extent of its availability for other uses is unclear. Uncertain Impact (?)
6. Conserve/ Enhance Biodiversity and Landscape	The site is heavily wooded (approximately 90%) and the entire site is protected by Tree Preservation Orders (TPO) that significantly limits development potential. Significant Negative Impact (--)
7. Promote Sustainable Journeys	The site is located within the urban area in an extremely sustainable location immediately adjacent to Three Bridges Station. Significant Positive Impact (++)
8. Provide Sufficient Infrastructure	The site is located within the existing neighbourhood which will be served by existing infrastructure services. Uncertain Impact (?)
9. Promote Sustainable Communities and Encourage Active Lifestyles	The site would be located within an existing neighbourhood area. Positive Impact (+)
Conclusions	The site size and configuration is too constrained to be suitable for residential development.

Assessment of Rejected Housing Sites

Name: Land East of Overdene Drive

Potential Site Designation: Housing

Description: vacant land between the neighbourhoods of Gossops Green and Ifield.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The site may have contamination issues from previous land uses and is likely to have some exposure to noise from the neighbouring Three Bridges to Horsham branch line and from Crawley Avenue. Uncertain Impact (?)
2. Adapt to Climate Change	The site is currently partly greenfield, and 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 at present does not contribute to the built environment, and residential development on this site could improve the visual contribution of the site. Positive 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. Any future development on the site may have small economic benefits since the occupants would contribute towards local community businesses. Positive Impact (+)
6. Conserve/ Enhance Biodiversity and Landscape	The site is partly overgrown and likely to have some biodiversity value in its current state. Development of the site could however include consolidation of areas suitable to support improved biodiversity. Positive Impact (+)
7. Promote Sustainable Journeys	The site is located within the urban area in a sustainable location. Positive Impact (+)
8. Provide Sufficient Infrastructure	Access to the site is constrained as the access constructed from Overdene Drive is only understood to be able to serve the westernmost portion of the site, containing a partially erected Sikh Community Centre, while the eastern section is hemmed in by Crawley Avenue to the east, the railway to the south, and school land to the north. This is considered to preclude the site from being served by the required infrastructure. Significant Negative Impact (--)
9. Promote Sustainable Communities and Encourage Active Lifestyles	The site would be located within an existing neighbourhood area. Positive Impact (+)
Conclusions	This site falls within the urban area close to local facilities. However, the constrained access remains a significant bar to the suitability of this site, along with possible environmental and noise issues.

Assessment of Rejected Housing Sites

Name: Car Park, Station Way

Potential Site Designation: Housing

Description: car park.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The site occupies a town centre location with excellent access to facilities and transport connections. However, the immediate environment is exposed to noise from the railway and from the road, such that it is unlikely to be feasible to provide residents with usable outdoor amenity space. The site may have contamination issues from previous land uses. Negative Impact (-)
2. Adapt to Climate Change	The site is within Flood Zone 1 and flood risk is unlikely to be a significant concern. The site is already hardstanding so it is unlikely that development would make a significant further contribution to flood risk or overheating within the locality. Neutral Impact (/)
3. Protect and/or Enhance the Built Environment	The plot is small and narrow and occupies a sensitive location close to heritage assets associated with the Brighton Road Conservation Area. A residential development of allocatable size at this location would be likely to have a cramped and unattractive appearance. Negative Impact (-)
4. Decent/ Affordable Homes	Residential development at this location would contribute towards meeting housing needs, although problems associated with the likely poor quality of living environment (given the exposure to noise) need to be set against this. Potential Negative Impact (-?)
5. Maintain/ Support Employment	Residential development at this location would help to support the local labour supply and therefore support the local economy/employment base. Positive Impact (+)
6. Conserve/ Enhance Biodiversity and Landscape	The site occupies a town centre location which is not particularly sensitive in terms of landscape or biodiversity, so any negative impacts here are likely to be able to be mitigated. Neutral Impact (/)
7. Promote Sustainable Journeys	The town centre location of the site offers excellent connections by rail and bus, as well as connection to walking and cycling networks. Positive Impact (+)
8. Provide Sufficient Infrastructure	It is unclear whether a residential development of any size in this location could operate without negatively impacting highway safety, given the narrowness of the public footway at this location and the intensity of traffic on the adjacent highway. Other infrastructure needs are likely to be capable of being mitigated. Potential Negative Impact (-)
9. Promote Sustainable Communities and Encourage Active Lifestyles	The site benefits from town centre facilities and connections which would tend to align with the objective of sustainable communities and active lifestyles. However, the noise levels in the immediate vicinity, and the difficulty of overcoming these within the constraints of the site, may tend to discourage residents from spending time outdoors. Potential Negative Impact (-)
Conclusions	Although the site benefits from a town centre location its small size and awkward shape and situation mean that residential development of an allocatable size is unlikely to be acceptable in terms of its impact on local character and highway safety, or the standard of accommodation provided.

Assessment of Rejected Housing Sites

Name: Land at Steers Lane (residual site)

Potential Site Designation: Housing

Description: Open countryside and trees, located immediately to the north of a housing development currently under construction.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The site is within the new residential neighbourhood of Forge Wood and benefits from the associated neighbourhood facilities, transport (including bus) connections, open space and other local infrastructure. On the other hand, the site would be exposed to unacceptable levels of aviation noise in the event of an addition southern runway being created at Gatwick Airport. Negative Impact (-)
2. Adapt to Climate Change	The site is currently greenfield and development of this site would increase the extent of hard surfacing. The site is predominantly in Flood Zone 1, but there is some risk of surface water flooding at the site. Development at this location is not considered to involve an increase in exposure to overheating risks. Neutral Impact (/)
3. Protect and/or Enhance the Built Environment	The site is currently clear of buildings and its wider vicinity in terms of the built environment is not especially sensitive in terms of character. There may be scope for new development to have a positive impact, and it should be possible at least for screening / structural landscaping to remove any adverse impact on the built character of the wider area. Potential Positive Impact (+?)
4. Decent/ Affordable Homes	Residential development at this location would contribute towards meeting housing needs, but the impacts of aviation noise on the health of residents in the event of a new southern runway being created at Gatwick Airport would need to be set against this. Negative Impact (-)
5. Maintain/ Support Employment	Residential development at this location would help to support the local labour supply and therefore support the local economy/employment base. Positive Impact (+)
6. Conserve/ Enhance Biodiversity and Landscape	Given that this is a greenfield site there is some landscape and biodiversity value, although this is likely to be sufficiently low that the impact should be able to be mitigated, including through design. Potential Negative Impact (-?)
7. Promote Sustainable Journeys	Residential development at this site would be expected to make use of, and thereby support, the bus connectivity and access to walking and cycling links which serve the wider neighbourhood. Positive Impact (+)
8. Provide Sufficient Infrastructure	The acceptability of highway access (whether through the estate to the south or to Balcombe Road to the east) would need to be established. Residential development at this location would also contribute to cumulative demand for other infrastructure services, although this is likely to be able to be mitigated. Uncertain Impact (?)
9. Promote Sustainable Communities and Encourage Active Lifestyles	The site would be located within a wider residential neighbourhood, with associated benefits in terms of sustainable communities and active lifestyles, although potential exposure to unacceptable levels of aviation noise, with associated implications for health and behavioural adaptations, should be weighed against this. Uncertain Impact (?)
Conclusions	The site is within the new Forge Wood Neighbourhood has some advantages as a potential residential site but is ultimately unsuitable owing to its exposure to unacceptable noise impacts in the event of a new southern runway being established at Gatwick. These impacts are not considered capable of being acceptably mitigated.

Assessment of Rejected Housing Sites

Name: Land West of Buttermere Close

Potential Site Designation: Housing

Description: Small fields/enclosures.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The site is within the new residential neighbourhood of Forge Wood and benefits from the associated neighbourhood facilities, transport (including bus) connections, open space and other local infrastructure. On the other hand, the site would be exposed to unacceptable levels of aviation noise in the event of an addition southern runway being created at Gatwick Airport. Noise from the railway is also likely to be a consideration on the western side of the site. Negative Impact (-)
2. Adapt to Climate Change	The site is currently greenfield and development of this site would increase the extent of hard surfacing. The site is mainly located in Flood Zone 1, but there is some risk of surface water flooding at the site. Development at this location is not considered to involve an increase in exposure to overheating risks. Neutral Impact (/)
3. Protect and/or Enhance the Built Environment	The site is currently largely clear of buildings. The neighbouring residential area to the south is not especially sensitive in terms of character. However, the area to the north is more sensitive owing to the presence of designated and undesignated heritage assets along Tinsley Green, as well as the low density character of this area. It is likely that any potential impacts here are capable of being avoided through screening. Neutral Impact (/)
4. Decent/ Affordable Homes	Residential development at this location would contribute towards meeting housing needs, but the impacts of aviation noise on the health of residents in the event of a new southern runway being created at Gatwick Airport would need to be set against this. Negative Impact (-)
5. Maintain/ Support Employment	Residential development at this location would help to support the local labour supply and therefore support the local economy/employment base. Positive Impact (+)
6. Conserve/ Enhance Biodiversity and Landscape	Given that this is a greenfield site there is some biodiversity value, although this is likely to be sufficiently low that the impact should be able to be mitigated. The site also has some landscape value as part of the setting of Forge Wood Neighbourhood and Tinsley Green, which would likely be affected. Potential Negative Impact (-?)
7. Promote Sustainable Journeys	Residential development at this site would be expected to make use of, and thereby support, the bus connectivity and access to walking and cycling links which serve the wider neighbourhood. Positive Impact (+)
8. Provide Sufficient Infrastructure	The acceptability of highway access (whether through the estate to the south or to Tinsley Green to the north) would need to be established. Residential development at this location would also contribute to cumulative demand for other infrastructure services, although this is likely to be able to be mitigated. Uncertain Impact (?)
9. Promote Sustainable Communities and Encourage Active Lifestyles	The site would be located within a wider residential neighbourhood, with associated benefits in terms of sustainable communities and active lifestyles, although potential exposure to unacceptable levels of aviation noise, with associated implications for health and behavioural adaptations, should be weighed against this. Uncertain Impact (?)
Conclusions	The site is within the new Forge Wood Neighbourhood has some advantages as a potential residential site but is ultimately unsuitable owing to its exposure to unacceptable noise impacts in the event of a new southern runway being established at Gatwick. These impacts are not considered capable of being acceptably mitigated.

Assessment of Rejected Housing Sites

Name: Land South of Tinslow Farm

Potential Site Designation: Housing

Description: Area of structural landscaping, adjacent to housing forming part of the new Forge Wood neighbourhood.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The site is within the new residential neighbourhood of Forge Wood and benefits from the associated neighbourhood facilities, transport (including bus) connections, open space and other local infrastructure. On the other hand, the site would be exposed to unacceptable levels of aviation noise in the event of an addition southern runway being created at Gatwick Airport. Negative Impact (-)
2. Adapt to Climate Change	The site is subject to risk of flood (Flood Zone 2 and partly Flood Zone 3a). The site is also currently greenfield and development of this site would increase the extent of hard surfacing. Development at this location is not considered to involve an increase in exposure to overheating risks. Potential Negative Impact (-?)
3. Protect and/or Enhance the Built Environment	The site is currently largely clear of buildings. The area to the north has some sensitivity owing to the presence of the Listed Tinslow Farmhouse, and it is likely that residential development of an allocatable scale on the site would have some impact on the setting of this building. Potential Negative Impact (-?)
4. Decent/ Affordable Homes	Residential development at this location would contribute towards meeting housing needs, but the impacts of aviation noise on the health of residents in the event of a new southern runway being created at Gatwick Airport would need to be set against this. Negative Impact (-)
5. Maintain/ Support Employment	Residential development at this location would help to support the local labour supply and therefore support the local economy/employment base. Positive Impact (+)
6. Conserve/ Enhance Biodiversity and Landscape	The site is nearly all structural landscaping, so development here would have some negative landscape impact. The site is likely to have some biodiversity value in its current state, although this is likely to be sufficiently low that the impact should be able to be mitigated. Negative Impact (-)
7. Promote Sustainable Journeys	Residential development at this site would be expected to make use of, and thereby support, the bus connectivity and access to walking and cycling links which serve the wider neighbourhood. Positive Impact (+)
8. Provide Sufficient Infrastructure	The acceptability of highway access would need to be established. Residential development at this location would also contribute to cumulative demand for other infrastructure services, although this is likely to be able to be mitigated. Uncertain Impact (?)
9. Promote Sustainable Communities and Encourage Active Lifestyles	The site would be located within a wider residential neighbourhood, with associated benefits in terms of sustainable communities and active lifestyles, although potential exposure to unacceptable levels of aviation noise, with associated implications for health and behavioural adaptations, should be weighed against this. Uncertain Impact (?)
Conclusions	The site is within the new Forge Wood Neighbourhood has some advantages as a potential residential site but is ultimately unsuitable owing to its exposure to unacceptable noise impacts in the event of a new southern runway being established at Gatwick. These impacts are not considered capable of being acceptably mitigated. The likely negative impact on structural landscaping is also considered to affect the

	suitability of the site.
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Assessment of Rejected Housing Sites

Name: Land South of Radford Road

Potential Site Designation: Housing

Description: Mostly overgrown parcel of land between existing premises.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The site is within the new residential neighbourhood of Forge Wood and benefits from the associated neighbourhood facilities, transport (including bus) connections, open space and other local infrastructure. On the other hand, the site would be exposed to unacceptable levels of aviation noise in the event of an addition southern runway being created at Gatwick Airport. Negative Impact (-)
2. Adapt to Climate Change	The site is currently greenfield and development of this site would increase the extent of hard surfacing. The site is predominantly in Flood Zone 1, but the area adjacent to Radford Road is in Zone 2 and there is some risk of surface water flooding at the site. It is likely, however, that flood risk arising from development at this location could be mitigated, while development at this location is not considered to involve an increase in exposure to overheating risks. Neutral Impact (/)
3. Protect and/or Enhance the Built Environment	The vicinity of the site has some sensitivity site in terms of the built environment owing to the prevailing low density character of development along Radford Road and Balcombe Road, and the presence of some non-designated heritage assets along Balcombe Road immediately to the east. Potential Negative Impact (-?)
4. Decent/ Affordable Homes	Residential development at this location would contribute towards meeting housing needs, but the impacts of aviation noise on the health of residents in the event of a new southern runway being created at Gatwick Airport would need to be set against this. Negative Impact (-)
5. Maintain/ Support Employment	Residential development at this location would help to support the local labour supply and therefore support the local economy/employment base. Positive Impact (+)
6. Conserve/ Enhance Biodiversity and Landscape	The northern portion of the site comprises structural landscaping, so development here would have some negative landscape impact. The site is likely to have some biodiversity value in its current state, although this is likely to be sufficiently low that the impact should be able to be mitigated. Negative Impact (-)
7. Promote Sustainable Journeys	Residential development at this site would be expected to make use of, and thereby support, the bus connectivity and access to walking and cycling links which serve the wider neighbourhood. Positive Impact (+)
8. Provide Sufficient Infrastructure	The acceptability of highway access to Radford Road would need to be established. Residential development at this location would also contribute to cumulative demand for other infrastructure services, although this is likely to be able to be mitigated. Uncertain Impact (?)
9. Promote Sustainable Communities and Encourage Active Lifestyles	The site would be located within a wider residential neighbourhood, with associated benefits in terms of sustainable communities and active lifestyles, although potential exposure to unacceptable levels of aviation noise, with associated implications for health and behavioural adaptations, should be weighed against this. Uncertain Impact (?)
Conclusions	The site is within the new Forge Wood Neighbourhood has some advantages as a potential residential site but is ultimately unsuitable owing to its exposure to unacceptable noise impacts in the event of a new southern runway being established at Gatwick. These impacts are not considered capable of being acceptably mitigated.

Assessment of Rejected Housing Sites

Name: Land at Black Corner

Potential Site Designation: Housing

Description: Fields and woodland.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The site is within the new residential neighbourhood of Forge Wood and benefits from the associated neighbourhood facilities, transport (including bus) connections, open space and other local infrastructure. On the other hand, the site would be exposed to unacceptable levels of aviation noise in the event of an addition southern runway being created at Gatwick Airport. Any harm to the Ancient Woodland on the site would also have negative implications from the perspective of climate change mitigation. Negative Impact (-)
2. Adapt to Climate Change	The site is currently greenfield and development of this site would increase the extent of hard surfacing, while harm to the Ancient Woodland on site could negatively impact its specific functions in terms of Flood Risk management and evaporative cooling. The site is mainly located in Flood Zone 1, but there is some risk of surface water flooding at the site. Uncertain Impact (?)
3. Protect and/or Enhance the Built Environment	The vicinity of the site has some sensitivity site in terms of the built environment owing to the prevailing low density character of development along Balcombe Road, which includes some non-designated heritage assets. It is likely to be possible to reduce the impact through screening, although this would depend in part on the configuration of highway access. Uncertain Impact (?)
4. Decent/ Affordable Homes	Residential development at this location would contribute towards meeting housing needs, but the impacts of aviation noise on the health of residents in the event of a new southern runway being created at Gatwick Airport would need to be set against this. Negative Impact (-)
5. Maintain/ Support Employment	Residential development at this location would help to support the local labour supply and therefore support the local economy/employment base. Positive Impact (+)
6. Conserve/ Enhance Biodiversity and Landscape	A significant proportion of the site comprises Ancient Woodland, with further Ancient Woodland and protected trees/structural landscape lying adjacent to the west. Any development at the site would need to avoid harm to these designations and their functions, which may mean that the developable area and means of access are limited. Potential Negative Impact (-)
7. Promote Sustainable Journeys	The wider neighbourhood benefits from bus connectivity and access to walking and cycling links, although the means of accessing these from the site remains unclear. Uncertain Impact (?)
8. Provide Sufficient Infrastructure	The site currently has no identified means of access to the public highway and any proposed access (e.g. via the future Forge Wood Phase 4B to the south) would need to be assessed. Residential development at this location would also contribute to cumulative demand for other infrastructure services, although this is likely to be able to be mitigated. Uncertain Impact (?)
9. Promote Sustainable Communities and Encourage Active Lifestyles	The site would be located within a wider residential neighbourhood, with associated benefits in terms of sustainable communities and active lifestyles. However, the means of accessing wider facilities and links remains uncertain and the potential exposure of the development to unacceptable levels of aviation noise, with associated implications for health and behavioural adaptations, should be weighed against such advantages as the site possesses. Uncertain Impact (?)
Conclusions	The site is within the new Forge Wood Neighbourhood, but any advantages it has as a potential residential site are offset by the fact that it is currently inaccessible and is ultimately unsuitable owing to its exposure to unacceptable noise impacts in the event of a new southern runway being established at Gatwick. These impacts are not considered capable of being acceptably mitigated. Significant parts of the site are also constrained by biodiversity and/or landscape assets.

Assessment of Rejected Housing Sites

Name: Additional Land Southeast of Heathy Farm

Potential Site Designation: Housing

Description: Woodland.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The site is within the new residential neighbourhood of Forge Wood and benefits from the associated neighbourhood facilities, transport (including bus) connections, open space and other local infrastructure. On the other hand the acceptability of the site for residential development from the perspective of noise remains unclear, owing to its proximity to the M23 at Junction 10 with Crawley Avenue. Significant loss of tree cover on the site, including harm to the Ancient Woodland, would also have negative implications from the perspective of climate change mitigation. Uncertain Impact (?)
2. Adapt to Climate Change	The site is currently greenfield and development of this site would increase the extent of hard surfacing, while harm to the Ancient Woodland on site could negatively impact its specific functions in terms of Flood Risk management and evaporative cooling. The site is within Flood Zone 1, with some parts at risk of surface water flooding. Uncertain Impact (?)
3. Protect and/or Enhance the Built Environment	The site is currently clear of buildings and the wider setting remains rural, albeit that the neighbouring site to the north is proposed for allocation for housing. It is likely that any potential impacts here are capable of being avoided through screening. Neutral Impact (/)
4. Decent/ Affordable Homes	Residential development at this location would contribute towards meeting housing needs, although problems associated with the potentially poor quality of living environment (given the exposure to noise) need to be set against this. Potential Negative Impact (-?)
5. Maintain/ Support Employment	Residential development at this location would help to support the local labour supply and therefore support the local economy/employment base. Positive Impact (+)
6. Conserve/ Enhance Biodiversity and Landscape	A large proportion of the site comprises Ancient Woodland and it is unclear what remains in terms of a developable site once the need to avoid harm to this has been taken into account. The part of the site next to Balcombe Road is also structural landscaping and the remainder of the site is also wooded. Negative Impact (-)
7. Promote Sustainable Journeys	The wider neighbourhood benefits from bus connectivity and access to walking and cycling links, although the means of accessing these from is unclear, given the constraints on the site. Uncertain Impact (?)
8. Provide Sufficient Infrastructure	Any proposed access (whether direct to Balcombe Road or via the proposed development to the north) would need to be assessed. Residential development at this location would also contribute to cumulative demand for other infrastructure services, although this is likely to be able to be mitigated. Uncertain Impact (?)
9. Promote Sustainable Communities and Encourage Active Lifestyles	The site would be located within a wider residential neighbourhood, with associated benefits in terms of sustainable communities and active lifestyles. However, the means of accessing wider facilities and links remains uncertain, given the site constraints. Potential Positive (+?)
Conclusions	The site is within the new Forge Wood Neighbourhood but any advantages it has as a potential residential site are offset by negatives, including its impact on Ancient Woodland and structural landscaping (which appear to constrain access to the highway), and uncertainty around the acceptability of the site for residential use from a noise perspective.

Assessment of Rejected Potential Areas of Search for Housing

Name: Land North of Forge Wood

Potential Site Designation: Area of Search for Housing

Description: the site is located beyond the Built-Up Area boundary to the north of Forge Wood neighbourhood, 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 potential southern runway at the airport. The site sits within the 57 and 60dB(A) aircraft noise contours for a single runway and between the 66 and 69dB(A) predicted noise contours for a southern runway. The site would therefore not be suitable for residential development at the current time. 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	The provision of new housing is closely linked to supporting economic growth. Any future development on the site may have small economic benefits since the occupants would contribute towards local community businesses. Positive 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 Forge Wood reduces this distance. Uncertain Impact (?)
9. Promote Sustainable Communities and Encourage Active Lifestyles	The site is currently located away from the existing established residential area. However, the development of Forge Wood reduces this distance. Uncertain Impact (?)
Conclusions	The site lies beyond the built up area boundary 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 Reserve Gypsy and Traveller Site (Policy H8)

Site Name: Broadfield Kennels, Broadfield

Site Potential Allocation: 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 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 a 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: The site is adjacent to a major road, although elevated above it, and careful design will be needed to mitigate these issues. The previous uses of the site may have led to contamination which will need to be assessed. 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 be 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 screen the site further if required. Negative Impact (-) or Neutral Impact (/) following mitigation
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 (+?)

SA Objective	Commentary and/or Impact
9. Promote Sustainable Communities and Encourage Active Lifestyles	The site is located in reasonably close proximity to the neighbourhood centre, the Broadfield Barton (approximately 1km) and 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. 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. Negative Impact (-)
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. Access is difficult, 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 Reserve Gypsy and Traveller Site

Site Name: Land north of Langley Walk

Site Potential Allocation: 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 site's 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 southern runway, which would mean that the site may not be a permanent option if a southern 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 (+?)
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

SA Objective	Commentary and/or Impact
	accommodating caravans. Significant Negative Impact (--)
9. Promote Sustainable Communities and Encourage Active Lifestyles	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. 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 was considered unsuitable to take forward as an allocation for a reserve Traveller site in the 2015 Local Plan. The continued requirement to safeguard land for a potential southern runway means this site could be significantly adversely affected by aircraft noise in future. This site is also unlikely to be suitable for a pitch site due to the flooding concerns.

Assessment of Designation Sites (Policy GI4)

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 Local Wildlife Site, 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. Significant 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 provide 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. Significant 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 the wider residential area. It offers Crawley's connection to the countryside, and forms the boundary of the town in a countryside setting. Significant 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 a Local Wildlife Site, 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. Significant Positive 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. Significant Positive Impact (++)
8. Provide Sufficient Infrastructure	No Impact (0)
9. Promote Sustainable Communities 10. Encourage Active Lifestyles	A Local Green Space must be of value to the local community to be designated as such. This has been demonstrated through previous consultations and through its designation as part of the 2015 Local Plan. The site provides Crawley's main access to the open countryside, along with the Rusper Road Playing Fields supporting both informal and formal recreation. Significant 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 Designation Sites (Policy HA6)

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 Gardens 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 (some less than a mile from Crawley's town centre), particularly Southgate, Northgate, Three Bridges 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 Sustainable Communities and Encourage Active Lifestyles	Heritage assets are of fundamental importance to the sense of place and value people place in their communities and towns. 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 and Memorial function now. Significant Positive 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 Designation Sites (Policy HA6)

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 Sustainable Communities and Encourage Active Lifestyles	Heritage assets are of fundamental importance to the sense of place and value people place in their communities and towns. 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. Significant Positive 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 Designation Sites (Policy HA6)

Site Name: Tilgate Park

Site Potential Designation: Historic Parks & Gardens

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 existing Historic Park & Garden designation and is in a location adjacent to the urban area. 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	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 borough. 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 Sustainable Communities and Encourage Active Lifestyles	Heritage assets are of fundamental importance to the sense of place and value people place in their communities and towns. Much of the park was historically formed as part of the pleasure grounds of Tilgate Manor. Its more recent establishment as a public park in the 1960s provides an important link between modern day leisure activity and the adaptation of landscape for recreational purposes in earlier centuries, retaining the principle of a 'park' as an identified area dedicated to exercise and pleasure. Significant Positive Impact (++)
Conclusions	The Historic Park and Garden recognises the role the Park plays in the historic interest to the area.

Assessment of Designation Sites (Policy HA6)

Site Name: Worth Park

Site Potential Designation: Historic Parks & Gardens

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 Worth Park will be protected. Following its use linked to a boarding school for girls, key elements of the 19 th century garden and parkland are still preserved in a compact area. Development close to or within the Park would have to take account of the interest particular to the site. The site is an existing Historic Park & Garden designation and is in a location within the urban area. 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 Sustainable Communities and Encourage Active Lifestyles	Heritage assets are of fundamental importance to the sense of place and value people place in their communities and towns. The park has recently been renovated due to Heritage Lottery Funding. Significant Positive Impact (++)
Conclusions	The Historic Park and Garden recognises the role the Park plays in the historic interest to the area.

Assessment of Designation Sites (Policy HA6)

Site Name: Land South of St. Nicholas' Church, Worth

Site Potential Designation: Historic Parks & Gardens

Site Description: Landscape mostly in private ownership.

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 Land South of St. Nicholas' Church will be protected and enhanced and recreated, linked to development. The site provides the setting of the Grade I Listed Church, which is identified as one of the "finest Saxon churches in England with the largest Saxon chancel arch in the county". The rural landscape provides a key feature of the Conservation Area. Development close to or within the Park would have to take account of the interest particular to the site. The site is an existing Historic Park & Garden designation and is in a location outside the Built Up Area Boundary. Significant Positive Impact (++)
4. Decent/ Affordable Homes	The site has been allocated to provide a limited amount of new housing up to 15 dwellings. 40% Affordable Housing. Positive 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 protected as a rural landscape in keeping with the Conservation Area. However, some housing development to the south of the site will significantly change this area. The recognition of the importance of the Historic Park and Garden as a whole and its role in creating the current landscape will influence the scheme layout and design, and can offer opportunities for recreation and enhancement of elements of the historic features. Some improvements to the Local Wildlife Site remaining and the site of archaeological interest will be required as part of the development. Positive Impact (+)
7. Promote Sustainable Journeys	The site is land in private ownership. No Impact (0)
8. Provide Sufficient Infrastructure	No Impact (0)
9. Promote Sustainable Communities and Encourage Active Lifestyles	The site is land in private ownership. No Impact (0)
Conclusions	The Historic Park and Garden recognises the role the Park plays in the historic interest to the area and its important role in providing the setting of the Conservation Area and the Grade I Listed Church.

Assessment of Designation Sites (Policy HA6)

Site Name: Broadfield Park

Site Potential Designation: Historic Parks & Gardens

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 Broadfield 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 existing Historic Park & Garden designation and is in a location within the urban area. 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 Sustainable Communities and Encourage Active Lifestyles	Heritage assets are of fundamental importance to the sense of place and value people place in their communities and towns. Significant Positive Impact (++)
Conclusions	The Historic Park and Garden recognises the role the Park plays in the historic interest to the area.

Assessment of Main Employment Areas (Policies EC1 - EC3)

Site Name: Manor Royal

Site Potential Designation: Main Employment Area. Manor Royal Business District is the leading destination for business uses in the Coast to Capital and Gatwick Diamond areas. It is designated as a Main Employment Area, with a particular focus on business development. Other employment uses will be permitted where these would support, and not undermine, the overall business role and function of 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 well established as Crawley’s main area for mixed business uses, comprising predominantly office, industrial and storage & distribution uses. Office uses are broadly clustered at City Place, Gatwick Road, Astral Towers and Crawley Business Quarter, with industrial and warehousing broadly focussed around Fleming Way, Faraday Road and along its eastern perimeter at Gatwick Road, with out-of-centre retail warehousing at County Oak. These business uses are interspersed with a supporting mix of non-business uses that complement Manor Royal’s principal business role.

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, and clustering of business uses ensures that new business development can be sustainably located adjacent to existing economic development. The area is identified as a Priority Area for District Energy Networks, with development asked to consider the options of linking to or creating a network. The main employment area benefits from good public and sustainable transport access. 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	Objectives are in place to make for an efficient use of existing sites through the refurbishment of older stock and intensification of existing sites to enable new business use. The majority of the main employment area falls within Flood Zone 1 (low probability) though areas around Crawter’s Brook and north of Crawley Avenue are subject to greater risk of fluvial flooding. Several small areas are subject to risk of surface water flooding. Part of Manor Royal has been rezoned to SES Water, though a significant part of the business district is subject to water neutrality requirements – whilst this means that part of Manor Royal is subject to water neutrality it also has offsetting potential through improving the water efficiency of existing buildings. Taken with broader sustainability policies set out within the Local Plan, the continued designation of Manor Royal as a Main Employment Area supports employment clusters and urban land forms which are resilient to climate change. Positive Impact (+)
3. Protect and/or Enhance the Built Environment	Continued designation of Manor Royal as a Main Employment Area retains the established business land use function of the area, protecting and reinforcing 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 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 this does restrict the scope for development of housing within the area. However, housing would be an inappropriate use within the Main Employment Area, with existing and future operational business uses potentially impacting upon the amenity of residents, and through restrictions that residential amenity would likely place on the economic function of the area for existing and future business uses. There is pressing need to sustain the business-led economic function of Manor Royal as a key employment location for residents of Crawley and the wider sub-region, particularly given the constrained employment land supply position. Loss of employment floorspace to housing would undermine the economic function of the Main Employment Area, and

SA Objective	Commentary and/or Impact
	consequently that of the town and potentially the wider sub-region. Therefore, retention of the economic function, and the avoiding of inappropriate residential development in Manor Royal, has a wider sustainability benefit. Continued identification of Manor Royal as a Main Employment Area, whilst not directly impacting the delivery of new homes, will help ensure that housing is avoided in areas that would result in a poor quality of life for occupiers. It is considered to have a neutral impact against this objective. Neutral (/)
5. Maintain/ Support Employment	Continued identification of Manor Royal as a Main Employment Area will ensure that the economic function of Crawley, at the heart of the Gatwick Diamond sub-region is retained and positively planned. The protection of Manor Royal for business-led economic development is vital given the constrained business land supply position of Crawley, and the resultant challenges in meeting Crawley's significant business land supply needs. The Local Plan policies build on evidence that Manor Royal should remain the focus for mixed business development. Retaining the role of Manor Royal as a business-led economic development destination performs strongly against this objective. Significant Positive Impact (++)
6. Conserve/ Enhance Biodiversity and Landscape	Manor Royal has defined boundaries and sits within the Built-Up Area Boundary. Within Manor Royal there are a number of natural and semi-natural areas that contribute greatly to the natural amenity value of the business district, conserving and enhancing its biodiversity and landscape value. This includes the retention of Magpie Wood, designation of Crawter's Brook as a people's park, and new pocket parks. The Manor Royal Design Guide SPD supports Policies EC1-EC3, with regard to improving the soft landscaping of the area. More broadly, retention of Manor Royal as a Main Employment Area helps support the overall employment land supply, reducing to some extent the requirement to identify new employment land in other locations. Positive Impact (+)
7. Promote Sustainable Journeys	Manor Royal is located in close proximity to a sustainable range of transport links other than the private 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, greater sustainable access opportunities are supported. New and ongoing projects with the Crawley Growth Programme continue to make sustainable journeys to and within Manor Royal more accessible, with examples including the recent introduction of smart bus stops, and ongoing improvements to the cycle network. 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, dedicated business hub, and other facilities to support the locality. Positive Impact (+)
9. Promote Sustainable Communities and Encourage Active Lifestyles	Through appropriately balancing and planning for employment and housing needs, the Local Plan can enable the town to be cohesive and its residents to travel locally to work, accessing a wide variety of opportunities. The opportunities associated with this Main Employment Area provides investment in the area, increasing employment opportunities for Crawley residents and those living within the wider area. Within the Main Employment Area, work has been undertaken to improve cycling, pedestrian links, and jog trails. Policy flexibility to supporting complementary business support and staff amenities in Manor Royal support performance against this objective further. Continued protection of the area for business-led economic growth ensures that these links are retained. Possible Positive or Slight Positive Impact (+?)
Conclusions	Manor Royal Business District is a well-established and sustainable location for business-led economic development that has important local and sub-regional significance. It is a 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 (Policies EC1-EC2 and TC1-TC5)

Site Name: Crawley Town Centre

Site Potential Designation: Main Employment Area. As a centrally located and highly sustainable location, the Town Centre is the sequentially 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. Given these dual roles, there is need to ensure that an appropriate balance is achieved between the employment and residential roles of the Town Centre, thus supporting its overall vitality and viability.

Site Description: Crawley Town Centre is the main shopping and leisure area in the borough and is a key visitor destination for the wider area. It contains a good range of shops, restaurants, cafes, and bars, as well as entertainment uses at Crawley Leisure Park. The Town Centre contains a number of development sites, which are allocated in the Local Plan for mixed-use development comprising residential and/or Main Town Centre Uses. The residential population of the Town Centre has grown significantly in recent years, and as well as being a Main Employment Area, the Town Centre is becoming a neighbourhood in its own right.

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 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. It's dual role as a main employment area and a place to live means that residents are located in close proximity to supporting facilities, though this also means that careful planning is required to avoid conflict between uses. It benefits from a range of sustainable transport links, including the recently upgraded Crawley Railway Station and Crawley Bus Station, which is subject to planned investment. Continued identification of the Town Centre as a Main Employment Area will help to retain its overall economic function, whilst ensuring this is appropriately balanced with residential to promote its overall vitality and viability, thereby supporting existing employment clusters and the efficient re-use of urban land forms in a sustainable location. Overall, the Town Centre is recognised as a highly sustainable location for economic development, and a location where there is opportunity for supporting residential use. The Town Centre is the site of a district heat network and has potential for the expansion of district energy supply using low carbon energy sources. Significant Positive Impact (++)
2. Adapt to Climate Change	It is located within Flood Zone 1 (low probability), though some areas are subject to risk from surface water flooding. It is situated within Sussex North Water Resource Zone and is subject to water neutrality but also has offsetting potential through water efficiency improvements to existing buildings. 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 for mixed use development presents opportunities to enhance the overall setting of the built environment through good design and the bringing into use of underutilised or vacant sites. Continued designation of the Town Centre as an employment site recognises its established commercial character, whilst allowing flexibility for other uses that would enhance its vitality and viability. Parts of the Town Centre have also been identified as a conservation area helping to protect and enhance its established character. Positive Impact (+)
4. Decent/ Affordable Homes	The Town Centre is identified as a Main Employment Area, but the Local Plan also recognises it as a sustainable location for residential development. Designation of the Town Centre as a Main Employment Area will not prejudice the delivery of residential development as this is expressly support in the Town Centre through Policy. Allocation of specific Town Centre locations for mixed use development may encourage the delivery of both housing and economic uses. It is therefore considered that designation of the Town Centre as a Main Employment Area, given the recognition that residential development in the Town Centre is appropriate where balanced with other main town centre uses, will have an uncertain, and potentially positive, impact on the delivery of decent affordable homes. Positive Impact (+)

SA Objective	Commentary and/or 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 growth through the promotion of sustainably located Main Town Centre uses, including as part of mixed use development. Policy flexibility helps support economic growth in this location. Significant Positive Impact (++)
6. Conserve/ Enhance Biodiversity and Landscape	Crawley Town Centre is predominantly urban in character. Memorial Gardens represents a key open space asset, designated in the Local Plan as a Historic Park & Garden meaning that the area will be protected from inappropriate development. Development within the Town Centre will be encouraged to promote biodiversity through good design and landscaping, though it is not considered that continued designation as a Main Employment Area will directly 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 public transport links. Through balancing housing and employment growth, and supporting mixed-use development in the Town Centre, the Local Plan will enable the town to be cohesive and support its residents to travel locally and sustainably to work, accessing a wide variety of opportunities. Significant Positive Impact (++)
8. Provide Sufficient Infrastructure	The Town Centre benefits from excellent supporting infrastructure, with improvements to Crawley Railway and Bus Stations supporting this further. The Local Plan identifies a specific policy to support provision of new infrastructure that facilitates the role of the Town Centre as a neighbourhood. 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 commercial and residential development. Positive Impact (+)
9. Promote Sustainable Communities and Encourage Active Lifestyles	Through promoting sustainable economic development and encouraging the mixed-use redevelopment of 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. The Town Centre contains commercial leisure uses and also the Memorial Gardens, promoting 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 sustainably located residential development, the Local Plan will strike an appropriate balance and relationship between uses, promoting active lifestyles and a good quality of life for residents, through the planning process. Significant Positive Impact (++)
Conclusions	Crawley Town Centre represents a highly sustainable location for economic growth and should continue to be supported as a main employment area and the sequentially preferred destination for Main Town Centre Uses throughout the Local Plan period.

Assessment of Employment Sites (Policy EC1-EC3; GAT1 and GAT4)

Site Name: Gatwick Airport

Site Potential Designation: Main Employment Area. 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, although the Local Plan provides flexibility for the non-airport related use of 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. It must be recognised that there are significant negative environmental impacts associated with the aviation industry more widely. These are not assessed here.

Site Description: During 2018/19, Gatwick Airport served 46.4 million passengers, a figure that the Gatwick Airport Master Plan forecasts to grow to 61 million passengers per annum (mppa) by 2032 within the current two terminal, single runway operation, and potentially to over 75 mppa by 2038 should the Government allow the operational use of its existing standby runway. It is a key economic driver through direct and indirect employment, and is central to the function of the wider economic area.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Mitigate Climate Change & Local Pollution	The airport is a sustainable location for employment uses that support the operation of the airport. Local Plan policies support aviation-related employment at the airport and provide the flexibility for non-airport related employment uses to locate at the airport provided this does not impact on the ability of the airport to meet its current and future operational needs. This makes best use of the available floorspace at the airport whilst also ensuring that 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 many sustainable surface access options to the airport. Therefore, it is appropriate that Gatwick Airport is designated as a Main Employment Area, as this is the most sustainable location for employment that is required to support the operational needs of the airport. Positive Impact (+)
2. Adapt to Climate Change	It is appropriate that Gatwick Airport is designated as a Main Employment Area given its key employment role and the need to locate airport-related employment at the airport. Significant parts of the airport are situated within Flood Zones 2 (medium probability) and 3a (high probability), as well as areas that are at risk of surface water flooding. Gatwick Airport is situated outside of the Southern Water Sussex North Water Resource Zone and is not therefore subject to water neutrality and cannot provide offsetting for other areas. Through the Local Plan, there is opportunity to utilise a decentralised energy network, and the airport operator has also developed its own climate change strategy which highlights a range of initiatives that it is undertaking to reduce CO2 emissions. Therefore, it is appropriate that Gatwick Airport is designated as a Main Employment Area, as the most sustainable location for employment that is required to support the operational needs of the airport. 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	Residential 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, with flexibility provided to allow the non-airport related employment only where this would not compromise the ability of the airport to meet its operational needs. This main employment area designation will enable the safe and efficient operation of

SA Objective	Commentary and/or Impact
	the airport as well as enable other employment uses to use vacant floorspace. An area of Manor Royal is subject to Gatwick Airport safeguarding, which does constrain the areas affected. Significant Positive Impact (++)
6. Conserve/ Enhance Biodiversity and Landscape	Although the airport is predominately built up, the airport operator does undertake activities as part of its corporate responsibility to maintain and enhance areas of biodiversity within its ownership. However, these do not necessarily relate to its Main Employment Area designation. No Impact (0)
7. Promote Sustainable Journeys	Notwithstanding the overarching sustainability challenges presented by air travel, the airport is a highly accessible location by sustainable surface transport, particularly train and bus. The s106 Legal Agreement and the Airport Surface Access Strategy contain targets for sustainable transport mode share, especially focussing on rail. The airport benefits from cycle and walking access as it is on the National Cycle Network which provides access via paths to the terminals. Provision is made for some staff car parking but the airport's staff travel plan contains a wide range of initiatives to encourage staff to travel by sustainable modes. These factors contribute positively to the overall suitability of the airport as a main employment area. Positive Impact (+)
8. Provide Sufficient Infrastructure	Employment uses at the airport make efficient use of existing infrastructure. The policies would not require the provision of additional infrastructure. Neutral Impact (/)
9. Promote Sustainable Communities and Encourage Active Lifestyles	The airport is a surface 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. The primary focus of the airport is to provide facilities for passengers and staff using the airport. It would therefore not be an appropriate location for leisure uses beyond those within airport hotels. Possible Positive or Slight Positive Impact (+?)
Conclusions	Gatwick Airport is a key employment destination benefitting from a choice of sustainable surface transport links. 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 (Policies EC1-EC3)

Site Name: Three Bridges Corridor

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

Site Description: Main Employment Area. Three Bridges Corridor is a large and well-connected employment site situated south of Haslett Avenue East and close to Three Bridges Railway Station. It includes Denvale Trade Park, Spindle Way, Stephenson Way and Hazelwick Avenue. It broadly 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. Residential uses adjoin the area and split the Main Employment Area adjacent to the Square-about.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Mitigate Climate Change & Local Pollution	Three Bridges Corridor is a sustainably located and well-established employment location 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, though vehicular access by private car is a factor. The area is also defined as a Priority Area for District Energy Networks, with potential opportunities to link into the Town Centre network. In maintaining the corridor as a Main Employment Area, the Local Plan recognises the existing location of employment uses and provides sustainability benefit through clustering of similar employment uses within an accessible location. Positive Impact (+)
2. Adapt to Climate Change	Much of the eastern part of Three Bridges Corridor, particularly at Hazelwick Avenue and Stephenson Way, fall within Flood Zones 2 (medium probability), 3a (high probability) and 3b (functional floodplain), with parts of the site also subject to risk of flooding from surface water. The site falls entirely within the Sussex North Water Resource Zone and is subject to water neutrality, though may also offer potential for offsetting of water use through retro-fit of existing buildings Continued identification of Three Bridges Corridor as a Main Employment Area will not itself specifically bring about adaptation of the area to climate change. Positive Impact (+)
3. Protect and/or Enhance the Built Environment	Three Bridges Corridor performs an important local function in providing accommodation for smaller-scale employment, 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, particularly for some smaller but more amenity intensive businesses, and therefore reduces the need for such 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, or residential amenity. In this regard, continued designation of the Corridor for employment use is viewed as having a possible positive or slight 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. Its designation as Main Employment Area means that the site is protected for employment uses and this does restrict the development of housing within the area. Residential use would not be appropriate within the Main Employment Area, as the nature of operational business in this location would be very likely to impact upon the amenity of residents. Residential uses would also place burden on the economic function of the surrounding area for existing and future employment uses. There is a need to sustain the local employment function of the area as an employment location for residents of Crawley and to support smaller-scale employment uses, particularly given the constrained employment land supply position. Retention of the economic function at the expense of housing has a wider sustainability benefit and continued identification of Three Bridges Corridor as a Main Employment Area is

SA Objective	Commentary and/or Impact
	considered to have a neutral impact against this objective. Neutral (/)
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. Significant Positive Impact (++)
8. Provide Sufficient Infrastructure	Three Bridges Corridor is 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, although it is close to the Town Centre, and 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 and Encourage Active Lifestyles	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. 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 encourage active lifestyles. Possible Positive or Slight Positive Impact (+?)
Conclusions	The designation of Three Bridges Corridor as a Main Employment Area and focus for economic generating development should be retained within the Local Plan given its contribution to sustainable economic growth, and accessible location within the town.

Assessment of Employment Sites (Policy EC1-EC3)

Site Name: Maidenbower Business Park

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

Site Description: Maidenbower Business Park is situated at the south-east of the borough, adjacent to the M23. It is a well-established employment destination that contains a mix of light industrial, storage, and office uses, as well as other uses including a hotel, car dealership and public house/restaurant.

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 proximity to the M23 makes private vehicles a key means of access. Identification of the Business Park as a Main Employment Area continues to make use of an established employment location though does not of itself offer particular climate change or local pollution benefits. Neutral Impact (/)
2. Adapt to Climate Change	The site falls within Flood Zone 1 (low probability), though small areas of the site are at risk of surface water flooding. It is situated outside of the Sussex North Water Resource Zone so is not subject to water neutrality and the site cannot provide offsetting for other areas. Continued identification of Maidenbower Business Park as a Main Employment Area will not itself specifically bring about adaptation of the area to climate change. No Impact (0)
3. Protect and/or Enhance the Built Environment	The designation of Maidenbower Business Park as a Main Employment Area provides the market with a choice of accommodation, and certainty as to the employment function of the area - this reduces the need for employment uses to consider locating in less appropriate locations where there could be scope for a negative impact on the character of the built environment. Possible Positive or Slight Positive Impact (+?)
4. Decent/ Affordable Homes	The designation of Maidenbower Business Park as a Main Employment Area means that the site is protected for employment uses and this does restrict the development of housing within the area. Residential use would not be appropriate within the Main Employment Area, as business operations in this location would be likely to impact upon the amenity of residents. Residential uses would also place burden on the economic function of the surrounding area for existing and future employment uses. Losing economic floorspace to housing would undermine the economic function of the Main Employment Area Therefore retention of the economic function at the expense of housing has a wider sustainability benefit. Neutral (/)
5. Maintain/ Support Employment	Maidenbower 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	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 is located in the south east of Crawley. It is accessible on foot and bike 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 readily accessible by private car. Given that the site is established as an operating economic location, its continued identification as a Main Employment Area does not impact against this category. No Impact (0)

SA Objective	Commentary and/or Impact
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 new 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 and Encourage Active Lifestyles	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. A public house/restaurant forms part of the site, whilst Maidenbower Neighbourhood Centre remains within walking distance. Given the smaller scale of the site and the presence of an established economic function, it is not considered that continued designation of Maidenbower Business Park as a Main Employment Area impacts on this indicator. 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 designation 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 as 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 Potential Designation: Main Employment Area. The site is identified for a flexible range of employment generating uses that will contribute to the overall economic function of the town.

Site Description: Tilgate Forest Business Park is a small, self-contained site situated adjacent to an area of countryside and mature woodland in 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 represents an established employment location comprising a cluster of good quality office accommodation.

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 designation as a Main Employment Area will continue to make use of the existing site for employment use. The site is not readily accessible from Crawley's neighbourhoods by foot and, although there is a bus route to the K2 Leisure Centre, the site's location just off the A23 means that private car represents the most likely means of access. The site represents an established employment location, and its continued designation for employment does not of itself impact on the mitigation of climate change & local pollution. It is situated adjacent to the K2 Priority Area for District Energy Network, though is not itself identified as part of this designation. Neutral Impact (/)
2. Adapt to Climate Change	The site falls within Flood Zone 1 (low probability), though small areas of the site are at risk of surface water flooding. It is situated within the Sussex North Water Resource Zone so is subject to water neutrality, with the opportunity for improving the water efficiency of existing buildings. 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. Neutral Impact (/)
3. Protect and/or Enhance the Built Environment	Continued designation of Tilgate Forest Business Park as a Main Employment Area provides the market with a choice of accommodation and provides certainty for existing occupiers. This 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. Possible Positive or Slight Positive Impact (+?)
4. Decent/ Affordable Homes	The designation of Tilgate Forest Business Park as a Main Employment Area means that the site is protected for employment uses and this does restrict the development of housing within the area. Residential use would not be appropriate within the Main Employment Area, as business in this location would be likely to impact upon the amenity of residents. Residential uses would also place burden on the economic function of the surrounding area for existing and future employment uses. Further, given the lack of accessibility of this site to nearby neighbourhoods, the site is particularly unsuitable for residential use. Therefore, retention of the economic function at the expense of housing has a wider sustainability benefit. In this regard, continued identification of Tilgate Forest Business Park as a Main Employment Area is considered to have a neutral impact against this objective. Neutral (/)
5. Maintain/ Support Employment	Tilgate Forest Business Park is one of several sites designated as a Main Employment Area in the Local Plan, and employment generating development at this location 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 (++)

SA Objective	Commentary and/or Impact
6. Conserve/ Enhance Biodiversity and Landscape	Tilgate Forest Business Park is situated within the Built-up-Area Boundary, 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. The proximity of ancient woodland potentially impacts upon development of the remaining vacant plot in the Business Park. Although the Business Park is situated close to an area of biodiversity and landscaping, given that this is already 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 readily accessible from Crawley's neighbourhoods on foot, and whilst there is a bus route to nearby K2 leisure centre, private car represents the key means of access. The site does not itself provide facilities or services to support employees, potentially increasing the need to travel. Given that the site already operates as an economic location, it is not considered that designation of Tilgate Forest Business Park as a Main Employment Area would impact on this indicator. No Impact (0)
8. Provide Sufficient Infrastructure	Given the existing function of Tilgate Forest Business Park, its formal identification as a Main Employment Area will not itself deliver, significant infrastructure, though the limited scope for employment intensification means that significant further infrastructure is unlikely to be required to serve the site. Neutral Impact (/)
9. Promote Sustainable Communities and Encourage Active Lifestyles	Designation of Tilgate Forest Business Park as a Main Employment Area will maintain the existing economic function of the site. The site is not readily accessible from Crawley's neighbourhoods on foot, and private car represents the key means of access. The site does not itself provide facilities or services to support employees, potentially increasing the need to travel. Although Tilgate Forest Business Park is situated close to K2 Leisure Centre, Broadfield Stadium pitches and also wider countryside, it does not provide sustainable access to neighbourhood centres. Its identification as a Main Employment Area will not itself specifically encourage active lifestyles. No Impact (0)
Conclusions	Tilgate Forest Business Centre remains an establish location for economic generating development and should be retained within the Local Plan given its existing role in the economic function of the town. The designation as a Main Employment Area as 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 Potential Designation: Main Employment Area. The site is identified for a flexible range of employment generating uses that will contribute to the overall economic function of the town.

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 represents an established employment location, though its employment function has been undermined by the introduction of residential use through permitted development.

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 support the remaining employment function of this location. The site is located at the eastern edge of Broadfield, at the edge of the urban area, potentially increasing the need to travel by private car. Whilst its designation as a Main Employment Area will help protect its remaining 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. No Impact (0)
2. Adapt to Climate Change	The existing main employment area falls partly within Flood Zone 3b (functional floodplain) and is subject to risk of surface water flooding. It is situated within the Sussex North Water Resource Zone, meaning it is subject to water neutrality but also presents scope for the water efficiency offsetting of existing buildings. 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. Neutral Impact (/)
3. Protect and/or Enhance the Built Environment	Identification of Broadfield Business Park as a Main Employment Area provides the market with a 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. Two of the office blocks within this park have been lost to residential use through permitted development, undermining the employment function of the Main Employment Area. Therefore, retained designation of Broadfield Business Park for employment use is viewed as having a possible positive or slight positive impact. Possible Positive or Slight Positive Impact (+?)
4. Decent/ Affordable Homes	A significant amount of office space at Broadfield Business Park has been lost to residential use through Permitted Development. The housing that has been provided is beneath national space standards, in a location that is not appropriate for residential development, and this has resulted in negative impacts for the remaining business occupiers. The site is not considered to represent a sustainable location for residential. Retaining the Main Employment Area designation will help to support remaining business(es) operating from the park and in combination with Article 4 Directions, deter further inappropriate residential development. Neutral Impact (/)
5. Maintain/ Support Employment	A significant amount of office space at Broadfield Business Park has been lost to residential use through Permitted Development. The housing that has been provided has resulted in negative impacts for the remaining business occupiers. Retaining the Main Employment Area designation will help to support the remaining business operating from the park, but it is recognised that the incursion of residential has significantly undermined the employment function of this location. Positive Impact (+)
6. Conserve/ Enhance Biodiversity and Landscape	Broadfield Business Park is situated within the Built-up-Area Boundary, adjacent to Broadfield Park Historic Gardens. Identification of the site as a Main Employment Area will help to retain the remaining employment function of the area within its current curtilage. Although the park is situated close to an area of biodiversity and landscaping, given that employment is an established use, its continued designation as a Main Employment Area will not impact upon the objective to enhance biodiversity and landscape. No Impact (0)

SA Objective	Commentary and/or Impact
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 located at the edge of Broadfield, at the edge of the urban area, 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 location, it is not considered that continued designation 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 continued designation 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. The introduction of residential use through Permitted Development will have added to infrastructure needs, but this does not relate to the Main Employment Area designation. Neutral Impact (/)
9. Promote Sustainable Communities and Encourage Active Lifestyles	Identification of Broadfield Business Park as a Main Employment Area will help maintain the remaining economic function of the site. The site is accessible by bus, but being located 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 location, it is not considered that its continued designation as a Main Employment Area would impact against this indicator. No Impact (0)
Conclusions	The employment function of this Main Employment Area has been undermined by the incursion of residential use through Permitted Development. However, given the pressing need to retain the supply of available business sites in Crawley, to help support the remaining business use on site, and to deter further inappropriate residential accommodation, it is considered appropriate to retain the Main Employment Area designation.

Assessment of Employment Sites (Policy EC1-EC3)

Site Name: Lowfield Heath

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

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-business uses. The existing stock is broadly of good condition, although its secondary location and poor internal highway layout do present disadvantages. The area contains the Grade II* Listed St. Michael and All Saints Church and is subject to flood risk at the east of the site. It is situated within the Gatwick Airport safeguarded land, which constrains the scope for development.

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 continued designation as a Main Employment Area will ensure the site retains its economic function, providing sustainability benefits through clustering employment uses within an identified area. The site is not readily accessible from Crawley's neighbourhoods on foot, though is located on the Fastway bus route, and is situated within proximity of Main Employment Areas at Gatwick Airport and to a lesser extent Manor Royal. Considering that Lowfield Heath has an already established economic function, its continued designation as a Main Employment Area will help protect it as an employment location, though 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	Much of the existing main employment area falls within Flood Zone 2 (medium probability) with areas of Flood Zones 3a (high probability) and 3b (functional floodplain) present within the site. It is located outside of Sussex North Water Resource Zone, so water neutrality does not apply and the site cannot provide offsetting for other areas. 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	Identification of Lowfield Heath as a Main Employment Area provides the market with a choice of accommodation and provides greater certainty for occupiers, therefore reducing the need for employment to consider locating in less appropriate areas where there could be scope for a negative impact on the character of the built environment. Possible Positive or Slight Positive Impact (+?)
4. Decent/ Affordable Homes	The designation of Lowfield Heath as a Main Employment Area will not directly deliver decent/affordable homes. Residential use would not be appropriate within the Main Employment Area, as business in this location would be likely to impact upon the amenity of residents. Residential uses would also place burden on the economic function of the surrounding area for existing and future employment uses. Retaining the site in employment use will mean that its core employment function is not undermined, whilst ensuring the residential development is directed to other appropriate locations that would achieve a good quality of life for its occupiers. Further, a lack of accessibility of this site to/from nearby neighbourhoods, and the presence of noise associated with Gatwick Airport, renders the site particularly unsuitable for residential use. Neutral 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 this location is 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. The location of the site within Gatwick Airport Safeguarded land does however constrain the scope for employment development. Positive Impact (+)

SA Objective	Commentary and/or Impact
6. Conserve/ Enhance Biodiversity and Landscape	The employment function of Lowfield Heath is well-established and the location represents a brownfield site. It is not considered that formal identification of the existing economic use through its continued designation 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 readily accessible from Crawley's neighbourhoods on foot, with bus and private car representing key means of access. Coupled with a relative absence of facilities or services to support employees, this potentially increases the need to travel. However, given that the site is already established as an economic location, it is not considered that continued designation 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, continued designation of Lowfield Heath as a Main Employment Area will not itself necessitate or deliver significant infrastructure. Neutral Impact (/)
9. Promote Sustainable Communities and Encourage Active Lifestyles	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 relatively isolated location, coupled with an absence of facilities of services to support employees potentially increases the need to travel by private car. However, given that the site is already established as an economic destination, it is not considered that its continued designation as a Main Employment Area would impact against this indicator. No Impact (0)
Conclusions	Located in close proximity to Gatwick Airport, this site is an established Main Employment Area that contributes to Crawley's available employment. It is appropriate that the site is retained as a Main Employment Area in the Local Plan.

Assessment of Employment Sites (Policy EC1-EC3)

Site Name: Broadfield Stadium and K2 Crawley

Site Potential Designation: Main Employment Area. These sites provide leisure and recreation focussed employment that contributes to the local economy.

Site Description: Broadfield Stadium and K2 are situated in the south of Crawley. The sites sit opposite one another either side of Brighton Road (A23), adjacent to Broadfield Business Park and close to Tilgate Forest Business Park, respectively. Both sites have an established leisure function, with Broadfield Stadium home to Crawley Town Football Club, and K2 Crawley providing a sub-regional sport and recreation offer. Leisure and recreation is identified within the NPPF definition of economic development and the economic contribution of the sites is recognised in the Local Plan.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Mitigate Climate Change & Local Pollution	Broadfield Stadium and K2 Crawley form an established leisure quarter which provides an employment offer. The continued designation of the sites as Main Employment Areas will support their established leisure & recreation led economic role. K2 Crawley has an existing Combined Heat and Power plant and is located within a Priority Area for District Energy Networks along with the nearby Desmond Anderson site. The area is subject to water neutrality, with the opportunity for improving the water efficiency of existing buildings. The site is accessible by bus and private vehicle, with pedestrian links from K2 Crawley into Tilgate and from Broadfield Stadium to the adjoining neighbourhood. Possible Positive or Slight Positive Impact (+?)
2. Adapt to Climate Change	K2 Crawley is situated within Flood Zone 1 (low probability) with pockets of the site at risk of surface water flooding. Broadfield Stadium falls within Flood Zones 2 (medium probability), 3a (high probability) and 3b (functional floodplain), with much of the site at risk of surface water flooding. Both sites are situated within Sussex North Water Resource Zone and are therefore subject to water neutrality, though also offer opportunities for retro-fitting of water efficiency measure to existing buildings. Identification as a Main Employment Area will not itself specifically bring about the adaptation of the area to climate change although its designation as a Priority Area for District Energy Networks should improve the provision of sustainable energy. Possible Positive or Slight Positive Impact (+?)
3. Protect and/or Enhance the Built Environment	Continued use of the area for leisure and recreation led employment use will not impact upon the built environment. There is very limited scope for further intensification of these sites. No Impact (0)
4. Decent/ Affordable Homes	The designation of Broadfield Stadium and K2 Crawley as a Main Employment Area means that the site is protected for employment uses and this does restrict the development of housing within the area. With regard to the quality of housing provision, there would be concern that housing would be an inappropriate use within the Main Employment Area, with large scale leisure uses attracting many visitors potentially impacting upon the amenity of residents, and through restrictions that residential amenity would place on the economic function of the surrounding area, both for existing and future leisure uses. Therefore, retention of the leisure function with its supporting employment at the expense of housing has a sustainability benefit. Continued identification of Broadfield Stadium and K2 Crawley as Main Employment Areas is considered to have a neutral impact against this objective. Neutral (/)
5. Maintain/ Support Employment	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 attracting visitor investment from a wider area Significant Positive Impact (++)

SA Objective	Commentary and/or 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. 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 reasonably accessible from Broadfield, Tilgate and Southgate neighbourhoods on foot and bike, but bus and private car represent the key means of access. A small café is provided within K2 Crawley for staff and customers. Weighing up the above considerations, in particular that the site already operates as an economic location, it is not considered that identification of Broadfield Stadium/K2 quarter 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 Broadfield Stadium/K2 quarter as a Main Employment Area will not itself necessitate or deliver significant infrastructure. Neutral Impact (/)
9. Promote Sustainable Communities and Encourage Active Lifestyles	Identification of Broadfield Stadium/K2 quarter as a Main Employment Area will maintain the existing leisure function of the site. As locations for leisure led employment, both sites are critical to encouraging active lifestyles for those that live and work in Crawley and also visitors from further afield. 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 Theatre

Site Potential Designation: Main Employment Area. An arts, culture and entertainment complex, it is a focus for creative and cultural uses in Crawley. In addition to its theatre function, it contains a dance studio, learning and meeting space, bar, restaurant and conferencing facilities.

Site Description: Situated around 0.5 miles from Crawley Town Centre, adjacent to an expanse of ancient woodland in Southgate Park.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Mitigate Climate Change & Local Pollution	The Hawth is an established leisure and cultural 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 will not of itself mitigate against the impacts of climate change and local pollution, it will not exacerbate these impacts further. Neutral Impact (/)
2. Adapt to Climate Change	The site is situated in Flood Zone 1 (low probability), with only small pockets of the site at risk of surface water flooding. It is located within the Sussex North Water Resource Zone, meaning it is subject to water neutrality, but also presenting opportunities for water efficiency measures to offset water use through improving the water efficiency of the Hawth building. Identification as a Main Employment Area will not itself specifically bring about the adaptation of the area to climate change. Neutral Impact (/)
3. Protect and/or Enhance the Built Environment	The Hawth is set in the open space of Southgate Playing Fields, adjacent to an expanse of protected ancient woodland. 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, there are natural constraints that would likely limit the scope for wider development at the site. No Impact (0)
4. Decent/ Affordable Homes	The designation of The Hawth as a Main Employment Area means that the site is protected for employment uses and this does restrict the development of housing within the area. Housing would not be an appropriate use within the Main Employment Area, with the operational theatre use attracting large numbers of visitors, particularly in the evening, impacting on residential amenity. Therefore, retention of the economic function at the expense of housing has a wider sustainability benefit. In this regard, continued identification of The Hawth as a Main Employment Area is considered to have a neutral impact against this objective. Neutral (/)
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. Significant Positive Impact (++)
6. Conserve/ Enhance Biodiversity and Landscape	Ancient woodland and open space 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 can be accessed from some Crawley neighbourhoods on foot, though bus and private car represent key means of access. The site does provide some limited facilities or services to support employees on site. Given that the site represents 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, continued identification of The Hawth as an arts and cultural focussed Main Employment Area will not itself necessitate or deliver significant infrastructure. Neutral Impact (/)

SA Objective	Commentary and/or Impact
9. Promote Sustainable Communities and Encourage Active Lifestyles	The Hawth is not located in the Town Centre or in the immediate vicinity of railway stations, but access by foot, cycle or bus are all achievable. It is however also dependent on vehicular access by private car. The Hawth does though promote 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. Significant Positive Impact (++)
Conclusions	Identification of The Hawth as a Main Employment Area will help to protect the valuable arts and culture-led employment function of this site. In doing so, the site contributes to the overall economic vitality of Crawley and provides significant sustainability benefits.

Strategic Employment Location (Policies EC1 and EC4)

Site Name: Land East of Balcombe Road and South of the M23 Spur (Gatwick Green)

Site Potential Designation: Local Plan Policies EC1 and EC4 allocate land at East of Balcombe Road and south of the M23 spur, referred to as Gatwick Green, for development of an industrial-led Strategic Employment Location of predominantly storage & distribution warehouse (Class B8) use.

Site Description: The Gatwick Green Strategic Employment Location is shown on the Local Plan Map. It measures 44ha in size and is located in the north east of Crawley borough, to the east of Balcombe Road and south of M23 spur road to Gatwick Airport. The site is located in the countryside adjacent to Gatwick Airport and beyond the Built Up Area Boundary, within the North East Crawley Rural Fringe landscape character area and the Gatwick Wood Biodiversity Opportunity Area. It comprises majority greenfield land and is adjacent to clusters of rural residential and small business properties, including listed buildings. Due to the requirement to retain the safeguarding of land at Gatwick Airport for a possible southern runway, the Gatwick Green site, located to the east of the airport, is considered to be the most appropriate site of a sufficient scale and location to deliver the quantum of required industrial and warehouse floorspace in a comprehensive way without prejudicing the potential delivery of a southern runway, should the Government decide that additional runway capacity is required at Gatwick Airport. The council is of the view the identification of this land within the Gatwick Airport Master Plan for surface car parking does not make for an efficient nor sustainable use of the site. This is particularly the case given that GAL has sought to use its own land much more efficiently to increase capacity where there is a demonstrable need for on-airport car parking, including through use of multi-storey car parks and robotic car parking. Given the need for new employment land in Crawley, the use of this land for a large expanse of surface car parking is not the most sustainable option. The Local Plan safeguarded boundary therefore excludes the Gatwick Green site, whilst retaining the safeguarded status of land to the south and east of the airport which may be required for the physical land take of a southern runway, airport operations and road diversions.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Mitigate Climate Change & Local Pollution	The Gatwick Green allocation is situated beyond the Built up Area Boundary in a countryside location, and largely represents greenfield land - It is situated in the north east of Crawley, adjacent to Gatwick Airport Main Employment Area and the allocated Horley Strategic Business Park (RBBC). This may present opportunities to link in with and improve existing sustainable transport connections. The site is however somewhat separated from Crawley's other Main Employment Areas and established residential areas, potentially increasing the need to travel by private vehicle, whilst the storage & distribution-led nature of operations will lead to an increase in HGV traffic movements. In this regard, other employment sites promoted through the Local Plan process would be more sustainable options, including those adjacent to Manor Royal, but these cannot be progressed due to the requirement to retain safeguarding and the fact that these other sites are situated on land that is potentially required to accommodate the physical land take of a southern runway, road diversions and other operational uses. The greenfield nature of Gatwick Green site means that its development will result in a loss of countryside and agricultural land. However, the strategic nature of the site and detailed policy requirements do present opportunities for climate change and pollution mitigation, including through the use of highly sustainable design and construction, prioritisation of sustainable transport modes, identification of the site as a Priority Area for District Energy Networks, careful master planning to ensure appropriate separation from nearby amenity sensitive uses, significant landscaping, and wider opportunities for flood mitigation and biodiversity net gain. Possible Negative or Slight Negative Impact (-?)
2. Adapt to Climate Change	The site is situated entirely within Flood Zone 1 (low probability) although some areas at the edge of the site are subject to risk of surface water flooding. A Strategic Employment Location at Gatwick Green would result in a loss of greenfield land, though strategic level new build could be designed to a highly sustainable standard to facilitate adaptation to climate change, including through its identification as a Priority Area for District Energy Networks. The site is situated outside of the Sussex North Water Resource Zone and is therefore not subject to water

SA Objective	Commentary and/or Impact
	neutrality. On this basis it is considered that development could offer scope to respond positively to climate change through the planning process. Possible Positive or Slight Positive Impact (+?)
3. Protect and/or Enhance the Built Environment	There is demand for additional business land and floorspace to meet identified business needs. The Local Plan is clear that the use and intensification of existing Main Employment Areas and appropriate extensions to Manor Royal will be supported, though there remains need for a quantum of floorspace that is best accommodated within a Strategic Employment Location. The site is adjacent to listed buildings at Donkey Lane, Peaks Brook Lane and locally listed buildings at Fernhill Road, Peaks Brook Lane, and Rivington Farm. The policy requirement for sustainable buildings, good design, appropriate landscaping and screening should ensure the setting of these listed buildings are protected and enhanced, and the new development is of high quality. A cluster of residential properties and small businesses are located close to the allocation also, and development must have regard to its surroundings, including its relationship with existing properties and the countryside. Possible Negative or Slight Negative Impact (-?)
4. Decent/ Affordable Homes	A Strategic Employment Location at Gatwick Green will help the Local Plan to balance the demands of employment and housing whilst working within the confines of Crawley's limited land supply. The location of the site, under the flight path for Gatwick Airport, means it is unsuitable for residential development due to the impact of aircraft noise. Given that the site cannot be used for residential development, its identification for employment land will not impact on the delivery of new homes. Existing residential properties are situated close to the allocated site, and the policy requirements for appropriate master planning should ensure the amenity of these buildings will be protected, with appropriate landscape buffers required to retain a sense of separation between the site and adjoining countryside and settlements. However, the development will bring about change for the residents. Possible Negative or Slight Negative Impact (-?)
5. Maintain/ Support Employment	The allocation of an industrial-led Strategic Employment Location at Gatwick Green will address a long-standing need for new employment land, specifically within the B8 storage & distribution sector in Crawley. This would support and complement Crawley's existing business offer, particularly that of Manor Royal, and also the allocated office-led Horley Strategic Business Park. The provision of new strategic employment land would support sustainable economic growth in Crawley and that of the wider Gatwick Diamond, attracting new business and facilitating the expansion of existing businesses which have been frustrated by a lack of available space, particularly within the B8 use class. This offers scope for complementarity with Manor Royal, helping retain its existing mixed-use business function which is coming under significant pressure from the demand for B8 floorspace. Allocation of a Strategic Employment Location therefore presents a significant opportunity to accommodate the business needs of Crawley, in a manner that does not prejudice the physical land take required to accommodate a possible southern runway at Gatwick Airport, supporting Crawley's role as the leading employment destination in the Gatwick Diamond. Significant Positive Impact (++)
6. Conserve/ Enhance Biodiversity and Landscape	The Gatwick Green site is not subject to any statutory landscape or nature conservation designations, but it is within the North East Crawley Rural Fringe local landscape area, and the Gatwick Wood Biodiversity Opportunity Area, both recognised in policies in the Local Plan. The site may have slightly higher landscape values than some other sites promoted to the council through the Local Plan process, though some of those alternative areas are themselves subject to statutory nature conservation designations. The development of land at Gatwick Green for employment use could have a negative impact on biodiversity, landscape features, flora and fauna. However, the strategic size of the site presents an opportunity to mitigate impacts on biodiversity or provide compensation. Development of the site will need to comply with requirements to deliver Biodiversity Net Gain, presenting the opportunity to enhance habitats and landscape features. A well located and designed development could be brought forward in a manner that minimises the negative landscape impact against this objective. Possible Negative or Slight Negative Impact (-?)
7. Promote Sustainable Journeys	The site is situated in the north east of Crawley, adjacent to Gatwick Airport Main Employment Area and the allocated Horley Strategic Business Park (RBBC). It is however relatively isolated from Crawley's other Main Employment Areas and established residential

SA Objective	Commentary and/or Impact
	neighbourhoods, potentially increasing the need to travel by private vehicle. The storage & distribution-led nature of operations will inevitably lead to an increase in HGV traffic movements. Other sites that have been promoted for employment, particularly those adjoining Manor Royal, are more sustainably located but these cannot be progressed due to the requirement to retain safeguarding. However, the proximity to Gatwick Airport main employment area and its railway station and the Horley Strategic Business Park allocation (RBBC) represent opportunities to link into the existing sustainable transport network, whilst the scale of the strategic development presents opportunities to provide improvements to public transport and active travel access for employees. Given the industrial and warehouse-led nature of development, it is possible that the location of the site close to Gatwick Airport and the M23 may reduce the need to access already busy routes through Crawley and Manor Royal. Uncertain (?)
8. Provide Sufficient Infrastructure	The Gatwick Green Strategic Employment Location represents a countryside location that is characterised in part by small-scale pepper potted commercial and residential development. Any critical mass of larger scale employment development would therefore create opportunity for a wider provision of infrastructure, serving the site and possibly wider needs. The scale of development and the strategic allocation at Gatwick Green offers the opportunity for innovative and high quality infrastructure to address the needs of the development and could help meet wider requirements of the borough. Unlike the situation for the other employment sites that have been promoted, land at Gatwick Green does not form part of the land take that would be required to accommodate the physical land take required for a southern runway and the diversion of the A23. It is shown in the Gatwick Airport Master Plan as being utilised for a large area of surface car parking. Surface parking does not represent an efficient use of land, particularly given the longstanding employment needs of Crawley, and given the scope for the airport to accommodate parking more efficiently through decked parking and other efficiency measures, should it be demonstrated that additional on-airport parking is required having regard to the airport's surface access obligations stated in the S106 legal agreement. Therefore, the Local Plan retains safeguarding but amends its boundary to exclude land to the east of Balcombe Road and south of the M23 spur. This represents the most appropriate site within Crawley that can be allocated for strategic employment growth without prejudicing the possible delivery of a southern runway at Gatwick Airport. Positive Impact (+)
9. Promote Sustainable Communities and encourage active lifestyles.	Strategic Employment Development at Gatwick Green would be well placed to link with the existing Main Employment Area at Gatwick Airport and the allocated Horley Strategic Business Park. There are opportunities to reinforce links from the immediate area to the neighbourhoods of Three Bridges and Forge Wood, enhance sustainable linkages with the bus, pedestrian and cycle network, whilst offering scope to contribute to the encouragement of healthy lifestyles through the design process. A Public Right of Way passes through the site, which may potentially need to be re-routed but can be enhanced. These factors must be considered against the loss of open space, and the need for careful and appropriate master planning to mitigate any negative impacts for nearby residents. Possible Positive or Slight Positive Impact (+?)
Conclusions	As a standalone site for a Strategic Employment Location, Gatwick Green will meet the industrial-led storage & distribution needs of Crawley. Other locations that have been promoted for strategic employment provision, particularly those adjoining Manor Royal, represent more sustainable locations, but these sites cannot be delivered due to the ongoing requirement to safeguard land for a possible southern runway. It is considered to be the most appropriate site that is of a sufficient scale and location to deliver the quantum of required industrial and warehouse floorspace in a comprehensive way without prejudicing the potential delivery of a southern runway, should the government decide that additional runway capacity is required at Gatwick Airport. This assessment has identified possible negative impacts relating mitigation of climate change and local pollution, the built environment and amenity for existing properties, and biodiversity and landscape. There is a clear need to ensure that these impacts are robustly mitigated through careful design, layout and master planning and the wider planning process.

Assessment of Rejected Employment Sites

Site Name: Land at Rowley Farm

Site Potential Designation: Industrial (Class B2) and Warehouse (Class B8) led Strategic Employment Location

Site Description: 52 hectare site located in countryside adjacent to the northern boundary of Manor Royal and western boundary of City Place, south of Gatwick Airport. The site is situated within the Upper Mole Farmlands Rural Fringe landscape character area and is subject to a number of environmental designations. There are two areas of Ancient Woodland on the site. One is located in the northeast corner of the site and the other in the southwest corner (Rowley Wood) which is also a Local Wildlife Site. The Site contains two listed buildings, namely Rowley Farmhouse (Grade II*) and Crown Post Barn (Grade II). All land with exception of the immediate areas adjacent to Crawter’s Brook is within Flood Zone 1. Crawter’s Brook forms the site’s western boundary and this area of the site is partly in Flood Zones 2 and 3. The site promoter advises that the net developable area is estimated to be 35 hectares to allow for structural landscaping around the site’s boundary, the two areas of Ancient Woodland, and provision of an appropriate setting to the listed buildings. The site is promoted by Homes England. The site is located within the area of land that is safeguarded from development for a potential future southern runway at Gatwick Airport, on land shown in the Gatwick Airport Master Plan as being required to accommodate the physical land take needed for a southern runway, road diversions and other operational requirements.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Mitigate Climate Change & Local Pollution	The site is situated beyond the Built up Area Boundary in a countryside location and represents greenfield land. New strategic employment development at this site would involve a loss of countryside land and would, given the industrial/distribution-led focus inevitably increase traffic movements. However, the site is situated immediately to the north of Manor Royal and to the west of City Place and would form a natural extension to the existing main employment area. In turn, this would present opportunities to maximise and enhance existing sustainable transport infrastructure that supports Manor Royal. The development of greenfield land would potentially have a negative impact in terms of climate change and local pollution, but its location offers a natural extension to Manor Royal, whilst providing opportunities to maximise sustainable design and access. Possible Positive or Slight Positive Impact (+?)
2. Adapt to Climate Change	Identification of a Strategic Employment Location that is well connected to existing Main Employment Areas represents a sustainable option. This promoted site is situated on greenfield land adjoining Manor Royal main employment area, and though its development would represent a loss of countryside land, there are opportunities to utilise and enhance established sustainable transport links to Manor Royal, and a strategic level new build could be designed to a highly sustainable standard in order to facilitate adaptation to climate change, including through linking in to the Manor Royal Priority Area for District Energy Networks. The site is located outside of the Sussex North Water Resource Zone so is not subject to water neutrality. All land with the exception of the immediate areas adjacent to Crawter’s Brook is within Flood Zone 1. Crawter’s Brook forms the site’s western boundary, and this area of the site is partly in Flood Zones 2 and 3. Small areas of the site, particularly at its boundary, are subject to risk of surface water flooding. On this basis it is considered that development could offer scope to respond positively to climate change through the planning process. Possible Positive or Slight Positive Impact (+?)
3. Protect and/or Enhance the Built Environment	The Local Plan is clear that the use and intensification of existing Main Employment Areas and appropriate extensions to Manor Royal will be supported, though there remains need for a dedicated quantum of industrial/storage & distribution floorspace that can best be accommodated within a Strategic Employment Location. 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, including its relationship with the countryside, and enhance the overall aesthetics of the built environment. The Site contains two listed buildings, namely Rowley Farmhouse (Grade II*) and Crown Post Barn (Grade II), and impact on listed buildings and their setting would need to be carefully considered. Impact on existing residential properties would be more limited than is the case for other promoted sites. This site is located on rising ground and forms a key visual break

SA Objective	Commentary and/or Impact
	between Manor Royal and Gatwick Airport, enhancing the setting of the built up area. Development at this site would have to be very carefully designed to avoid a negative impact on the setting of the built up area. Possible Negative or Slight Negative Impact (-?)
4. Decent/ Affordable Homes	The site would not be appropriate for residential development due to the impact of aircraft noise should a future southern runway progress at Gatwick Airport, and identification of the site for employment land will not therefore impact on the delivery of new homes. There are relatively few residential properties located within the identified site, so the number of dwellings impacted would be relatively limited. Neutral Impact (/)
5. Maintain/ Support Employment	The allocation of an industrial and warehouse-led Strategic Employment Location would help address the long-standing need for new business land in Crawley. The site would be well placed to support and complement Manor Royal, and provision of new strategic employment land would support sustainable economic growth in Crawley and that of the wider Gatwick Diamond, attracting new business and facilitating the expansion of existing businesses which have been frustrated by a lack of available space, particularly within the B8 use class. However, the allocation of a Strategic Employment Location at this particular site, given its location within the safeguarded area and on land that forms part of the physical land take for a potential southern runway, would prejudice delivery of a southern runway should this be required, preventing future expansion of the airport and the employment growth this would generate. Positive Impact (+)
6. Conserve/ Enhance Biodiversity and Landscape	The site is subject to a number of environmental designations. There are two areas of Ancient Woodland on the site. One is located in the northeast corner of the site and the other in the southwest corner (Rowley Wood) which is also a Site of Nature Conservation Importance. The site promoter advises that the developable area would be reduced to 35ha to allow for structural landscaping around the site's boundary, the two areas of Ancient Woodland, and provision of an appropriate setting to the listed buildings. There is some risk that development at this location could impact negatively on the visual gap between Manor Royal and Gatwick Airport, an impact on the landscape that may be exacerbated by the rising gradient of the land. Development of the site for employment use could have a negative impact on biodiversity, landscape features, flora and fauna. However, the strategic size of the site presents an opportunity to mitigate impacts on biodiversity or provide compensation, and development of the site will in any event need to comply with future requirements to deliver Biodiversity Net Gain, presenting the opportunity to enhance habitats and landscape features. Negative Impact (-)
7. Promote Sustainable Journeys	Industrial and warehouse-led strategic employment development would inevitably increase traffic movements through both site operation and the creation of jobs, therefore increasing the need to travel. The proximity of the site to Manor Royal represents an increased opportunity to link into existing sustainable transport networks and enhance these to promote sustainable journeys. It is anticipated by the promoter that the site would be accessed via either London Road to the north or James Watt Way to the south, or potentially via Gatwick Road. The promoter also outlines that the site could help support the delivery of a Western Link Road. Given the industrial and warehouse-led nature of development, it is possible that the location of the site close to Manor Royal will significantly impact upon what are already busy routes through Crawley and Manor Royal. Delivery of a Western Link Road may be important in this regard. Possible Positive or Slight Positive Impact (+?)
8. Provide Sufficient Infrastructure	A critical mass of larger scale employment development would create opportunity for a wider provision of infrastructure, serving the site and possibly wider needs. The site promoter notes that a Western Link Road would be delivered. However, the site cannot be allocated due to the requirement to retain safeguarding, as the site is located on land that is needed for the physical land take of a southern runway, road diversions and operational uses should this be required. Therefore, there is risk that the delivery of nationally significant infrastructure, in the form of a southern runway, would be prejudiced were this site to come forward. Significant Negative Impact (--)
9. Promote Sustainable Communities and	A Strategic Employment Location at this site would be well placed to link with the existing Main Employment Areas at Manor Royal and Gatwick Airport. There are opportunities to reinforce links sustainable transport linkages with the bus, pedestrian and cycle network, whilst offering scope to contribute to the encouragement of healthy lifestyles through the design process. A Strategic Employment Location would

SA Objective	Commentary and/or Impact
encourage active lifestyles.	therefore be well placed to perform positively against this indicator. Possible Positive or Slight Positive Impact (+?)
Conclusions	The promoted site would appear to be of a sufficient size and scale to accommodate an industrial and warehouse-led Strategic Employment Location and given its location would be well placed to form a natural extension to Manor Royal. It is anticipated by the promoter that delivery of a Strategic Employment Location would also be supported by a Western Link Road, potentially easing the transport impacts for Manor Royal and the surrounding road network. The site is subject to ecological designations and listed buildings that would need to be taken into consideration and is on rising land so development could affect the landscape setting. However, critically, the site is located on land that is required to be safeguarded for a possible southern runway at Gatwick Airport, being situated on land that is directly required for the physical land take of the runway, road diversions and operational uses. As such, its allocation as a Strategic Employment Location would prejudice delivery of a southern runway at Gatwick Airport, contrary to national policy.

Assessment of Rejected Employment Sites

Site Name: Land North and South of Hydehurst Lane

Site Potential Designation: Industrial (Class B2) and Warehouse (Class B8) led Strategic Employment Location

Site Description: The site measures around 17.9 hectares in area and is promoted by Quod on behalf of Aberdeen Standard Investments and The Barker Trust. It is situated adjacent to the northern boundary of Manor Royal, mainly to the north of Hydehurst Lane, with a smaller area of the site to its south. It is located outside of the Built-up Area Boundary, in countryside within the Upper Mole Farmlands Rural Fringe landscape character area. A Public Right of Way passes through the site. It is largely located within Flood Zone 1 (Low Probability), however the eastern section of the Site is partially within Flood Zones 2 (Medium Probability) and 3 (High Probability) along Crawter's Brook. Three attenuation ponds are located within the site boundary to the south (two north of Hydehurst Lane and one south of Hydehurst Lane). There is an area of ancient semi-natural woodland located immediately adjoining the south-eastern corner of the site. The site is located within the area of land that is safeguarded from development for a potential future southern runway at Gatwick Airport on land shown in the Gatwick Airport Master Plan as being required to accommodate the physical land take needed for a southern runway, road diversions and other operational requirements

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Mitigate Climate Change & Local Pollution	The site is situated beyond the Built up Area Boundary in a countryside location and represents greenfield land. Strategic employment development at this site would involve a loss of countryside land, though given its location immediately to the north of Manor Royal, would form a logical extension to the existing main employment area. In turn, this could present opportunities to maximise and enhance existing sustainable transport infrastructure, and link into the Priority Area for District Energy Networks. The greenfield nature of the site provides scope to mitigate climate change impacts through sustainable new built development. Possible Positive or Slight Positive Impact (+?)
2. Adapt to Climate Change	The promoted site is situated on greenfield land adjoining the Manor Royal main employment area, and though its development would represent a loss of countryside land, it's location as a logical extension to Manor Royal presents opportunities to utilise and enhance existing sustainable transport links, and link into the identified Manor Royal Priority Area for District Heating Networks. Development could therefore offer scope to respond positively to climate change through the planning process. The site is largely located within Flood Zone 1 (Low Probability). However, the eastern section of the Site is partially within Flood Zones 2 (Medium Probability) and 3 (High Probability) along Crawter's Brook. Three attenuation ponds are located within the site boundary to the south (two north of Hydehurst Lane and one south of Hydehurst Lane). Small areas of the site are subject to risk of surface water flooding. The site is situated outside of the Sussex North Water Resource Zone and is therefore not subject to water neutrality. Possible Positive or Slight Positive Impact (+?)
3. Protect and/or Enhance the Built Environment	The Local Plan is clear that the use and intensification of existing Main Employment Areas and appropriate extensions to Manor Royal will be supported, though there remains need for a dedicated quantum of industrial/storage & distribution floorspace that can best be accommodated within a Strategic Employment Location. Local Plan policy requires that the principles of good design are adhered to. Any potential new development would need to have regard to its surroundings, including its relationship with the countryside, and enhance the overall aesthetics of the built environment. The site does not contain any existing residential dwellings or listed/locally listed buildings, although the Grade II listed Gatwick Manor Inn and Gatwick Manor Barn are located to the west. Impact on listed buildings and their setting would need to be carefully considered. Possible Positive or Slight Positive Impact (+?)
4. Decent/ Affordable Homes	The site would not be appropriate for residential development due to the impact of aircraft noise should a future southern runway progress at Gatwick Airport, and identification of the site for employment land will not therefore impact on the delivery of new homes. There are no residential properties located within the identified site. Neutral Impact (/)

SA Objective	Commentary and/or Impact
5. Maintain/ Support Employment	. The allocation of an industrial and warehouse-led Strategic Employment Location would help address the long-standing need for new business land in Crawley. The site would be well placed to support and complement Manor Royal, and provision of new strategic employment land would support sustainable economic growth in Crawley and that of the wider Gatwick Diamond, attracting new business and facilitating the expansion of existing businesses which have been frustrated by a lack of available space, particularly within the B8 use class. However, the allocation of a Strategic Employment Location at this particular site, given its location within the safeguarded area and on land that forms part of the physical land take for a potential southern runway, would prejudice delivery of a southern runway should this be required, preventing future expansion of the airport and the employment growth this would generate. Positive Impact (+)
6. Conserve/ Enhance Biodiversity and Landscape	The site is situated in a countryside location, though is not itself subject to environmental designations. Rowley Wood, an area of ancient semi-natural woodland and Local Wildlife Site adjoins the south-eastern corner of the site. Development of the site for employment use could therefore have a negative impact on biodiversity, landscape features, flora and fauna. Development of the site would need to comply with future requirements to deliver Biodiversity Net Gain, presenting the opportunity to enhance habitats and landscape features. Possible Negative or Slight Negative Impact (-?)
7. Promote Sustainable Journeys	Industrial and warehouse-led employment development would increase traffic movements through both site operation and the creation of jobs, therefore increasing the need to travel. The proximity of the site to Manor Royal may represent an increased opportunity to link into existing sustainable transport networks and enhance these to promote sustainable journeys. The site promoter advises that access would be via Hydehurst Lane, which is owned by the Landowners and currently serves existing units within Manor Royal. Given the industrial and warehouse-led nature of development, it is possible that the location of the site close to Manor Royal, and accessing onto London Road, will impact upon what are already busy routes through Crawley and Manor Royal. Possible Positive or Slight Positive Impact (+?)
8. Provide Sufficient Infrastructure	The smaller scale of this site potentially limits the opportunity for the provision of infrastructure to serve the site and possibly wider needs. The site cannot be allocated due to the requirement to retain safeguarding, as it is located on land that is needed for the physical land take of a southern runway, road diversions and other operational uses should this be required. Therefore, there is risk that the delivery of nationally significant infrastructure, in the form of a southern runway, would be prejudiced were this site to come forward. Significant Negative Impact (--)
9. Promote Sustainable Communities and encourage active lifestyles.	Employment development at this site would adjoin Manor Royal and offers opportunities to reinforce sustainable transport linkages with the bus, pedestrian and cycle network, whilst offering scope to contribute to the encouragement of healthy lifestyles through the design process. Possible Positive or Slight Positive Impact (+?)
Conclusions	The location of the site adjoining Manor Royal would form a logical extension to the existing main employment area and may offer scope to enhance the existing sustainable transport offer. The site adjoins ecological designations that would need to be taken into consideration. Critically, the site is located on land that is safeguarded for a possible southern runway at Gatwick Airport, being situated on land that is required for the runway, road diversions and other operational uses. Its allocation would therefore prejudice the potential delivery of a southern runway at Gatwick Airport, contrary to national policy.

Assessment of Rejected Employment Sites

Site Name: Jersey Farm Business Park (incorporating Land at Jersey Farm (Sites B and C), Land at Little Dell Farm (Sites A, B & C), Land at Poles Lane (Sites A & B))

Site Potential Designation: Industrial (Class B2) and Warehouse (Class B8) led Strategic Employment Location

Site Description: Jersey Farm Business Park (19ha) is promoted by Vail Williams on behalf of various landowners. The master planned site includes Land at Jersey Farm Site A (with extant planning permission for B8 warehousing, forming part of the existing employment land supply), Land at Jersey Farm Site B and Site C, Land at Little Dell Farm (Sites A, B, C), and Land at Poles Lane (Sites A & B). The sites are promoted for industrial and/or storage & distribution use on a collective master planned basis, and also individually. This assessment considers the collective of sites under the Jersey Farm Business Park banner, with individual sites assessed subsequently. A separate site, Land at Spikemead Farm, does not form part of the Jersey Farm Business Park master plan area and is assessed separately.

The Jersey Farm Business Park sites is located north of County Oak, beyond the Built-up Area Boundary in countryside that falls within the Upper Mole Farmlands Rural Fringe landscape character area. Jersey Farm Site B is situated outside of the Gatwick Airport safeguarded land, west of the permitted scheme at Jersey Farm Site A, and extends west into the countryside. The other promoted land parcels are located within land that is safeguarded for development of a potential future southern runway at Gatwick Airport. The site is situated within the Area of Search for a Western Multi-Modal Transport Link. Two listed buildings are situated either within, or adjacent to the site boundary. There are no specific environmental designations within the promoted site, though a Local Wildlife Site and Biodiversity Opportunity Area is located to its west.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Mitigate Climate Change & Local Pollution	The site is situated beyond the Built up Area Boundary in a countryside location and represents greenfield land. Development would involve a loss of countryside land, though the master planned area would represent a logical extension to Manor Royal, presenting opportunities to maximise and enhance existing sustainable transport infrastructure, and link into the Priority Area for District Energy Networks. The greenfield nature of the sites provides some scope to mitigate climate change impacts through sustainable new build development. Possible Positive or Slight Positive Impact (+?)
2. Adapt to Climate Change	The promoted site would represent a natural extension to Manor Royal, presenting opportunities to utilise and enhance existing sustainable transport links and link into the Priority Area for District Energy Networks. Development could therefore offer scope to respond positively to climate change through the planning process. The site is subject to a small area of Flood Zone 2/3 along its western boundary, with some parts of the site subject to surface water flood risk. The site falls largely within the Sussex North Water Resource Zone, particularly the south and western parts of the site, and these areas would be subject to water neutrality but also presenting opportunities for water efficiency measures to offset water use. Possible Positive or Slight Positive Impact (+?)
3. Protect and/or Enhance the Built Environment	The Local Plan is clear that appropriate extensions to Manor Royal will be supported, though there remains need for a dedicated quantum of industrial/storage & distribution floorspace. Principles of good design will be adhered to, and new development would need to have regard to its surroundings, including its relationship with the countryside, and enhance the overall aesthetics of the built environment. The site has an opportunity to link into the existing Manor Royal Main Employment Area, though would extend further west and north into the countryside. Residential dwellings are located adjacent to the northern boundary of the sites, and whilst acknowledging that there are two master plans for the site (one with development north and south of the main access road, and a second with development only to the south) these may be particularly affected. Two listed buildings, Grove Cottage and Knight's Acre, are located within and adjacent to the site. Versions of the master plan show alternative layouts, including one that would result in the loss of the listed Grove Cottage. Possible Negative or Slight Negative Impact (-?)

SA Objective	Commentary and/or Impact
4. Decent/ Affordable Homes	The site would not be appropriate for residential development due to the impact of aircraft noise should a future southern runway progress at Gatwick Airport, and identification of the site for employment land will not therefore impact on the delivery of new homes. There are some residential properties located adjacent to the identified site, and though the number of dwellings impacted would be relatively limited, those properties bordering the site would appear likely be particularly affected. Possible Negative or Slight Negative Impact (-?)
5. Maintain/ Support Employment	The allocation of an industrial and warehouse-led Strategic Employment Location would help address the long-standing need for new business land in Crawley. The site would be well placed to support and complement Manor Royal, and provision of new strategic employment land would support sustainable economic growth in Crawley and that of the wider Gatwick Diamond, attracting new business and facilitating the expansion of existing businesses which have been frustrated by a lack of available space, particularly within the B8 use class. However, only a small part of the promoted site (Jersey Farm Site B) is situated outside of safeguarding. The remainder of land is located within the safeguarded area and on land that forms part of the physical land take for a potential southern runway, meaning that development would prejudice delivery of a southern runway should this be required preventing future expansion of the airport and the employment growth this would generate. Positive Impact (+)
6. Conserve/ Enhance Biodiversity and Landscape	The site is situated within the countryside (Upper Mole Farmlands Rural Fringe landscape character area), adjacent to Local Wildlife Site and Biodiversity Opportunity Area designations, though is not itself subject to specific environmental designations. Development for employment use could have a negative impact on biodiversity, landscape features, flora and fauna, and would need to comply with future requirements to deliver Biodiversity Net Gain, presenting the opportunity to enhance habitats and landscape features. Development would also result in a westward incursion into the countryside, and some urbanising effect along the London Road frontage. The site promoter has submitted an indicative master plan setting out how scheme layout may be able to address these concerns. Possible Negative or Slight Negative Impact (-?)
7. Promote Sustainable Journeys	Industrial and warehouse-led employment development would increase traffic movements through both site operation and the creation of jobs, therefore increasing the need to travel. The proximity of the site to Manor Royal may represent an opportunity to link into existing sustainable transport networks to promote sustainable journeys. The sites fall within the Area of Search for a Western Multi-Modal Transport Link, and the site promoter has submitted an indicative master plan showing how a scheme across the promoted sites may be able to achieve complementarity with this approach. Given the industrial and warehouse-led nature of employment need, it is possible that site location close to County Oak may impact upon routes through Crawley and Manor Royal. Possible Positive or Slight Positive Impact (+?)
8. Provide Sufficient Infrastructure	It is possible that opportunities may exist to access the site longer-term via a western Crawley multi-modal link road, potentially avoiding development exacerbating existing traffic congestion at County Oak. However, the site cannot be allocated due to the requirement to retain safeguarding, as it is predominantly located on land that is needed for the physical land take of a southern runway, road diversions and other operational uses should this be required. Therefore, there is risk that the potential delivery of nationally significant infrastructure, in the form of a southern runway, would be prejudiced were this site to come forward. Significant Negative Impact (--)
9. Promote Sustainable Communities and encourage active lifestyles.	Employment development at the sites would partially adjoin Manor Royal and there may be opportunities to link into existing sustainable transport links The location presents opportunities to link more directly with Langley Green neighbourhood. The development would involve a loss of countryside, although the supporting master plan shows the relationship between development and retention of the existing Public Rights of Way. Possible Positive or Slight Positive Impact (+?)
Conclusions	The promoted site is located within proximity of Manor Royal and County Oak and would represent a logical extension to Manor Royal, potentially offering positive sustainability outcomes. However, critically, the site is located predominantly on land safeguarded for a possible southern runway at Gatwick Airport, on land that is directly required for runway and operational uses. Allocation of this site would

SA Objective	Commentary and/or Impact
	therefore prejudice the potential delivery of a southern runway at Gatwick Airport, contrary to national policy. As required by national policy, land to the south of Gatwick Airport therefore continues to be safeguarded and cannot be considered for allocation as a Strategic Employment Location at this time.

Assessment of Rejected Employment Sites

Site Name: Land at Jersey Farm (Site B)

Site Potential Designation: Industrial (Class B2) and Warehouse (Class B8) led Strategic Employment Location

Site Description: Land at Jersey Farm Site B (2.18ha) is promoted by Vail Williams on behalf of Ardmore for industrial and/or storage & distribution use. The site has been considered above, alongside other promoted sites, in the context of the master planned Jersey Farm Business Park. With the sites having been promoted on both a collective and individual basis, the assessment below considers Jersey Farm Site B on a standalone basis. It is considered separately to Jersey Farm Site C due to its location outside of the Gatwick Airport safeguarded land.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Mitigate Climate Change & Local Pollution	The site is situated beyond the Built up Area Boundary in a countryside location, immediately west of the extant permission for warehouse development at Jersey Farm Site A. There may be opportunities for the site to link into and enhance existing sustainable transport infrastructure, and also access the Manor Royal Priority Area for District Energy Networks. The greenfield nature of the site may also provide some scope to mitigate climate change impacts through sustainable new build development. Possible Positive or Slight Positive Impact (+?)
2. Adapt to Climate Change	The promoted site is located within proximity to County Oak and Manor Royal, though in extending development further westwards would not in isolation represent as logical an extension to Manor Royal as other sites. There may be opportunities to utilise and enhance existing sustainable transport links and link into the Priority Area for District Energy Networks, and development could therefore offer scope to respond positively to climate change through the planning process. The site significantly falls within Flood Zone 1 and is broadly subject to only a low risk of surface water flooding. The site falls largely within the Sussex North Water Resource Zone and would be subject to water neutrality but also presenting opportunities for water efficiency measures to offset water use. Possible Positive or Slight Positive Impact (+?)
3. Protect and/or Enhance the Built Environment	Local Plan policy requires that the principles of good design are adhered to, and any development would need to have regard to its surroundings, including its relationship with the countryside, and enhance the overall aesthetics of the built environment. Standalone employment development, unless very discrete and well landscaped would be visually prominent from the residential neighbourhood of Langley Green, representing a significant incursion into the countryside, potentially more so than for other sites that have a closer relationship with the existing main employment areas. The site does not contain any residential dwellings. Possible Negative or Slight Negative Impact (-?)
4. Decent/ Affordable Homes	The site would not be appropriate for residential development due to the impact of aircraft noise should a future southern runway progress at Gatwick Airport, and identification of the site for employment land will not therefore impact on the delivery of new homes. The site does not contain any residential dwellings. Neutral Impact (/)
5. Maintain/ Support Employment	Identification of Site B for employment would add a 2.18ha site to the available supply pipeline of employment land, though is not of a sufficient quantum to meet identified needs in full. The site is situated outside of the safeguarded land, so its development would not prejudice delivery of a southern runway should this be required at a future point. Site B in isolation is not of a sufficient quantum to accommodate identified needs, and on a standalone basis does not represent as logical an extension to Manor Royal as would be the case were it to come forward with those other sites that comprise the Jersey Farm Business Park promoted site. Therefore, although allocation of the sites would help to meet some of Crawley's business land need, on a standalone basis, Site B does not provide a sufficient quantum of employment land take that would outweigh wider impacts considered in the SA. Positive Impact (+)

SA Objective	Commentary and/or Impact
6. Conserve/ Enhance Biodiversity and Landscape	The site is situated within the countryside (Upper Mole Farmlands Rural Fringe landscape character area), adjacent to a Local Wildlife Site and Biodiversity Opportunity Area designations, though is not itself subject to specific environmental designations. Development of the site for employment could have a negative impact on biodiversity, landscape features, flora and fauna, particularly were it to come forward on a standalone basis, where the site would likely be used more intensively compared with its use in the master planned Jersey Farm Business Park Development would need to comply with requirements to deliver Biodiversity Net Gain, potentially presenting the opportunity to enhance habitats and landscape features. Development would result in a westward incursion into the countryside that could result in a significant urbanising effect. Development of the sites on a standalone basis would be likely to have a particular impact on the countryside setting of Langley Green neighbourhood, given that development would protrude significantly west into the countryside beyond Manor Royal. Possible Negative or Slight Negative Impact (-?)
7. Promote Sustainable Journeys	Industrial and warehouse-led employment development would increase traffic movements through both site operation and the creation of jobs, therefore increasing the need to travel. The proximity of the site to the periphery of Manor Royal may represent an opportunity to link into existing sustainable transport networks to promote sustainable journeys, though this is potentially more achievable were the site to come forward on a collective basis as part of the wider Jersey Farm Business Park. The site falls within the Area of Search for a Western Multi-Modal Transport Link - the site promoter has submitted an indicative master plan showing how a wider Jersey Farm Business Park may be able to achieve complementarity with this approach, though it is unclear how this might work were Site B to come forward in isolation. Given the industrial and warehouse-led nature of employment need, it is possible that the location of the sites close to County Oak will impact upon routes through Crawley and Manor Royal. Uncertain Impact (?)
8. Provide Sufficient Infrastructure	Were the site to come forward on a standalone basis, it would likely be accessed via County Oak Way, similar to development at Site A. The smaller scale of this site potentially limits the opportunity for the provision of infrastructure to serve the site and possibly wider needs. Given the industrial and warehouse-led nature of employment need, it is possible that the location of the sites close to County Oak will impact upon what are already busy routes through Crawley and Manor Royal. The site is located outside of the Gatwick Airport safeguarded land, so could come forward without prejudicing a possible future southern runway. Uncertain Impact (?)
9. Promote Sustainable Communities and encourage active lifestyles.	Employment development at the site would partially adjoin Manor Royal and there may be opportunities to link into existing sustainable transport links including active travel into Langley Green neighbourhood. A Public Right of Way runs through the west of the site and would need to be retained. Possible Positive or Slight Positive Impact (+?)
Conclusions	The site is not of a sufficient size and scale to accommodate an industrial and warehouse-led Strategic Employment Location and would not therefore be capable of meeting Crawley's employment land requirements on a comprehensive basis, potentially necessitating the need to identify additional sites. The promoted site would add to the overall land supply pipeline and is located within proximity of Manor Royal and County Oak. Taken alongside other sites being promoted to deliver the Jersey Farm Business Park, the site would represent a natural extension to Manor Royal. However, were Site B to come forward in isolation, the extension becomes less logical, resulting in a westward extension into the countryside. Although the site is subject to fewer environmental designations than is the case for other sites, there would be an impact on landscape character and the Langley Green neighbourhood due to the westward extension for development and the urbanising effect this would have. Land at Jersey Farm Site B, whilst outside of safeguarding, would not on a standalone basis represent a logical extension to Manor Royal, and is likely to result in a negative impact on the countryside were it to come forward in isolation. Overall, the relatively small scale of employment that could be accommodated is considered unlikely to outweigh the other negative impacts.

Assessment of Rejected Employment Sites

Site Name: Land at Jersey Farm (Site C)

Site Potential Designation: Industrial (Class B2) and Warehouse (Class B8) led Strategic Employment Location

Site Description: Land at Jersey Farm Site C (8.77ha) is promoted by Vail Williams on behalf of Ardmere for industrial and/or storage & distribution use. The site is considered on a collective basis with others as Jersey Farm Business Park above. This assessment specifically considers Jersey Farm Site C. It is considered separately to Jersey Farm Site B due to its location within the Gatwick Airport safeguarded area.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Mitigate Climate Change & Local Pollution	The site is situated beyond the Built up Area Boundary in a countryside location, north and west of the extant permission for warehouse development at Jersey Farm Site A. Although the site is located adjacent to County Oak and Manor Royal, if taken forward on a standalone basis, development would form a somewhat incongruous westward extension to the existing main employment area. There may be opportunities for the site to link into and enhance existing sustainable transport infrastructure and access the Manor Royal Priority Area for District Energy Networks. The greenfield nature of the site may also provide some scope to mitigate climate change impacts through sustainable new build development. Possible Positive or Slight Positive Impact (+?)
2. Adapt to Climate Change	The promoted site is located within proximity to County Oak and Manor Royal, though in extending development further north and westwards would not in isolation represent as logical an extension to Manor Royal as other sites. There may be opportunities to utilise and enhance existing sustainable transport links and link into the Priority Area for District Energy Networks, and development could therefore offer scope to respond positively to climate change through the planning process. The site significantly falls within Flood Zone 1 though there is a small area of Flood Zone 2/3 along its western boundary. It is broadly subject to a low risk of surface water flooding. The site falls largely within the Sussex North Water Resource Zone and would be subject to water neutrality but also presenting opportunities for water efficiency measures to offset water use. Possible Positive or Slight Positive Impact (+?)
3. Protect and/or Enhance the Built Environment	The Local Plan is clear that the use and intensification of existing Main Employment Areas and appropriate extensions to Manor Royal will be supported, though there remains need for a dedicated quantum of industrial/storage & distribution floorspace that can best be accommodated within a Strategic Employment Location. Local Plan policy requires that the principles of good design are adhered to, and development would need to have regard to its surroundings, including its relationship with the countryside, and enhance the overall aesthetics of the built environment. Standalone employment development, unless very discrete and well landscaped would be visually prominent from the residential neighbourhood of Langley Green, representing a significant incursion into the countryside, potentially more so than for other sites that have a closer relationship with the existing main employment areas. Residential dwellings are located adjacent to the northern boundary of Site C, and these may be particularly affected if companion promoted sites at Poles Lane were also to come forward. Residential dwellings are located adjacent to the northern boundary of the sites, and these may be particularly affected. Two listed buildings, Grove Cottage and Knight's Acre, are located within and adjacent to the site. Versions of the master plan show alternative layouts, including one that would result in the loss of the listed Grove Cottage. Possible Negative or Slight Negative Impact (-?)
4. Decent/ Affordable Homes	The site would not be appropriate for residential development due to the impact of aircraft noise should a future southern runway progress at Gatwick Airport, and identification of the site for employment land will not therefore impact on the delivery of new homes. There are some residential properties located adjacent to the identified site, and though the number of dwellings impacted would be relatively limited, those properties bordering the site would appear likely be particularly affected. Possible Negative or Slight Negative Impact (-?)
5. Maintain/ Support	Identification of Site C for employment use would add to the available supply pipeline of employment land, though is not of a sufficient

SA Objective	Commentary and/or Impact
Employment	quantum to meet identified needs in full. It is situated on land that is required to be safeguarded, specifically on land that would accommodate the physical land take for a potential southern runway and supporting infrastructure, meaning that development would prejudice delivery of a southern runway should this be required preventing future expansion of the airport and the employment growth this would generate. Positive Impact (+)
6. Conserve/ Enhance Biodiversity and Landscape	The site is situated within the countryside (Upper Mole Farmlands Rural Fringe landscape character area), adjacent to Local Wildlife Site and Biodiversity Opportunity Area designations, though is not itself subject to specific environmental designations. Development for employment use could have a negative impact on biodiversity, landscape features, flora and fauna, and would need to comply with future requirements to deliver Biodiversity Net Gain, presenting the opportunity to enhance habitats and landscape features. Development would result in a westward incursion into the countryside. For the collective Jersey Farm Business Park promoted site, the promoter has submitted an indicative master plan setting out how scheme layout may be able to address these concerns. However, this will likely be more challenging to mitigate on a smaller individual plot were Site C to come forward individually. Possible Negative or Slight Negative Impact (-?)
7. Promote Sustainable Journeys	Industrial and warehouse-led employment development would increase traffic movements through both site operation and the creation of jobs, therefore increasing the need to travel. The proximity of the site to the periphery of Manor Royal may represent an opportunity to link into existing sustainable transport networks to promote sustainable journeys, though this is potentially more achievable were the site to come forward on a collective basis as part of the wider Jersey Farm Business Park. The site falls within the Area of Search for a Western Multi-Modal Transport Link - the site promoter has submitted an indicative master plan showing how a wider Jersey Farm Business Park may be able to achieve complementarity with this approach, though it is unclear how this might work were Site C to come forward in isolation. Given the industrial and warehouse-led nature of employment need, it is possible that the location of the sites close to County Oak will impact upon routes through Crawley and Manor Royal. Uncertain Impact (?)
8. Provide Sufficient Infrastructure	It is possible that opportunities may exist to access the site longer-term via a western Crawley multi-modal link road, potentially avoiding development exacerbating existing traffic congestion at County Oak. The smaller scale of this site potentially limits the opportunity for the provision of infrastructure to serve the site and possibly wider needs. However, the site cannot be allocated due to the requirement to retain safeguarding, as it is predominantly located on land that is needed for the physical land take of a southern runway, road diversions and other operational uses should this be required. Therefore, there is risk that the potential delivery of nationally significant infrastructure, in the form of a southern runway, would be prejudiced were this site to come forward. Significant Negative Impact (--)
9. Promote Sustainable Communities and encourage active lifestyles.	Employment development at the site would partially adjoin Manor Royal and there may be opportunities to link into existing sustainable transport links including active travel into Langley Green neighbourhood. A Public Right of Way runs through the west of the site and would need to be retained. Possible Positive or Slight Positive Impact (+?)
Conclusions	The site is not of a sufficient size and scale to accommodate an industrial and warehouse-led Strategic Employment Location and would not therefore be capable of meeting Crawley's employment land requirements on a comprehensive basis, potentially necessitating the need to identify additional sites. The promoted site is located within proximity of Manor Royal and County Oak and presents an opportunity for an extension to Manor Royal, though coming forward on an individual basis would deliver reduced sustainability benefits compared with the collective sites promoted as Jersey Farm Business Park. Critically, the site is located on land safeguarded for a possible southern runway at Gatwick Airport, specifically on land that is directly required for runway and operational uses. Allocation of this site would therefore prejudice the potential delivery of a southern runway at Gatwick Airport, contrary to national policy. As required by national policy, land to

SA Objective	Commentary and/or Impact
	the south of Gatwick Airport therefore continues to be safeguarded and cannot be considered for allocation as a Strategic Employment Location at this time.

Assessment of Rejected Employment Sites

Site Name: Land at Little Dell Farm (Sites A, B and C)

Site Potential Designation: Industrial (Class B2) and Warehouse (Class B8) led Strategic Employment Location

Site Description: The sites are promoted by Vail Williams as follows: Site A (3.98ha) on behalf of Willmott; Site B (1.94ha) on behalf of Ohm and Hill; Site C (0.27ha) on behalf of Ardmore. The sites have been considered above on a collective basis with others under the Jersey Farm Business Park banner. This assessment specifically considers Land at Little Dell Farm Sites A, B, and C. These sites, although promoted individually, are located in close proximity, and linked in terms of their anticipated access arrangements. They are considered subject to similar sustainability opportunities and constraints and are therefore assessed jointly. The sites are located to the north of County Oak and Astral Towers, with Site A fronting onto London Road, Site C immediately adjoining it to the west, and Site B ‘cutting in’ to the north of Site A. The sites are situated in a countryside location beyond the Built-up Area Boundary that falls within the Upper Mole Farmlands Rural Fringe landscape character area and are all located within the land that is safeguarded from development for a potential future southern runway at Gatwick Airport, shown in the Gatwick Airport Master Plan as being required to accommodate the physical land take needed for a southern runway and other operational requirements.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Mitigate Climate Change & Local Pollution	The sites are situated beyond the Built up Area Boundary in a countryside location, running flush to the northern boundary of Manor Royal as it extends west. Site A fronts onto London Road, and this represents a likely access point were these sites to come forward separately to the collective Jersey Farm Business Park promoted site. The proximity of Manor Royal presents opportunities to maximise and enhance existing sustainable transport infrastructure, and link into the Priority Area for District Energy Networks. The greenfield nature of the sites provides some scope to mitigate climate change impacts through sustainable new build development. Possible Positive or Slight Positive Impact (+?)
2. Adapt to Climate Change	The promoted sites would represent a logical extension to Manor Royal, presenting opportunities to utilise and enhance existing sustainable transport links and link into the Priority Area for District Energy Networks. Development could therefore offer scope to respond positively to climate change through the planning process. The sites are located within Flood Zone 1 with small parts of the site subject to surface water flood risk. The sites fall largely outside the Sussex North Water Resource Zone (the south of Site B being subject to water neutrality) and development could be planned to come forward outside of the Sussex North WRZ area. Possible Positive or Slight Positive Impact (+?)
3. Protect and/or Enhance the Built Environment	The Local Plan is clear that appropriate extensions to Manor Royal will be supported, though there remains need for a dedicated quantum of industrial/storage & distribution floorspace. Local Plan policy requires that the principles of good design are adhered to, and new development would need to have regard to its surroundings, including its relationship with the countryside, and enhance the overall aesthetics of the built environment. The site has an opportunity to link into the existing Manor Royal Main Employment Area, though would extend further west and north into the countryside. The northward extension of Manor Royal along London Road is likely to have a particularly urbanising effect and would require careful landscaping. There are few residential dwellings that would be affected were the site to come forward, with those existing themselves forming part of the promoted site. Listed buildings are situated further west of the sites, though these are separated from Little Dell Farm by the separately promoted sites at Poles Lane. Neutral Impact (/)

SA Objective	Commentary and/or Impact
4. Decent/ Affordable Homes	The site would not be appropriate for residential development due to the impact of aircraft noise should a future southern runway progress at Gatwick Airport, and identification of the site for employment land will not therefore impact on the delivery of new homes. There are few residential dwellings that would be affected were the site to come forward, with those existing themselves forming part of the promoted site. Listed buildings are situated further west of the sites, though these are separated from Little Dell Farm by the separately promoted sites at Poles Lane. Neutral Impact (/)
5. Maintain/ Support Employment	The sites would add to the available employment land supply pipeline, though are not of a sufficient area to meet Crawley's employment needs in full. The sites would be well placed to complement Manor Royal, supporting sustainable economic growth in Crawley and that of the wider Gatwick Diamond. However, the sites are situated on land that is required to be safeguarded, specifically on land that would accommodate the physical land take for a potential southern runway and supporting infrastructure, meaning that development would prejudice delivery of a southern runway should this be required preventing future expansion of the airport and the employment growth this would generate. Positive Impact (+)
6. Conserve/ Enhance Biodiversity and Landscape	The site is situated within the countryside (Upper Mole Farmlands Rural Fringe landscape character area) though is not itself subject to specific environmental designations. Development for employment use could have a negative impact on biodiversity, landscape features, flora and fauna, and would need to comply with future requirements to deliver Biodiversity Net Gain, presenting the opportunity to enhance habitats and landscape features. Development would potentially result in an urbanising effect both west and northwards. For the collective Jersey Farm Business Park promoted site, the promoter has submitted an indicative master plan setting out how scheme layout may be able to address these concerns, though it is not clear how this would be addressed were the sites to come forward in isolation from the master planned scheme. Possible Negative or Slight Negative Impact (-?)
7. Promote Sustainable Journeys	Industrial and warehouse-led employment development would increase traffic movements through both site operation and the creation of jobs, therefore increasing the need to travel. The proximity of the site to Manor Royal may represent an opportunity to link into existing sustainable transport networks to promote sustainable journeys. The sites fall within the Area of Search for a Western Multi-Modal Transport Link, and the site promoter has submitted an indicative master plan showing how a scheme across the promoted sites may be able to achieve complementarity with this approach – it is assumed a similar access alignment would be possible were the Little Dell Farm sites to come forward separately to the master planned scheme. Given the industrial and warehouse-led nature of employment need, it is possible that site location close to County Oak may impact upon routes through Crawley and Manor Royal. Possible Positive or Slight Positive Impact (+?)
8. Provide Sufficient Infrastructure	It is possible that opportunities may exist to access the site longer-term via a western Crawley multi-modal link road, potentially avoiding development exacerbating existing traffic congestion at County Oak. The smaller scale of this site potentially limits the opportunity for the provision of infrastructure to serve the site and possibly wider needs. However, the site cannot be allocated due to the requirement to retain safeguarding, as it is predominantly located on land that is needed for the physical land take of a southern runway, road diversions and other operational uses should this be required. Therefore, there is risk that the potential delivery of nationally significant infrastructure, in the form of a southern runway, would be prejudiced were this site to come forward. Significant Negative Impact (--)
9. Promote Sustainable Communities and encourage active lifestyles.	Employment development at the sites would adjoin Manor Royal and there may be opportunities to link into existing sustainable transport links. The development would involve a loss of countryside, although the supporting master plan for the wider scheme shows the relationship between development and retention of the existing Public Rights of Way. Possible Positive or Slight Positive Impact (+?)

SA Objective	Commentary and/or Impact
Conclusions	<p>The site is not of a sufficient size and scale to accommodate an industrial and warehouse-led Strategic Employment Location and would not therefore be capable of meeting Crawley's employment land requirements on a comprehensive basis, potentially necessitating the need to identify additional sites. The promoted sites are located within proximity of Manor Royal and present the opportunity for an extension to the main employment area accessed via London Road. Critically, the site is located on land that is safeguarded for a possible southern runway at Gatwick Airport, specifically on land that is directly required for runway and operational uses. Allocation of this site would therefore prejudice the potential delivery of a southern runway at Gatwick Airport, contrary to national policy. As required by national policy, land to the south of Gatwick Airport therefore continues to be safeguarded and cannot be considered for allocation as a Strategic Employment Location at this time.</p>

Assessment of Rejected Employment Sites

Site Name: Land at Poles Lane (Sites A and B)

Site Potential Designation: Industrial (Class B2) and Warehouse (Class B8) led Strategic Employment Location

Site Description: The sites are promoted by Vail Williams, Site A (1.43ha) on behalf of Maxwell, and Site B (0.68ha) on behalf of Rixon and Crook. The sites are promoted for flexible business use individually, and also on a collective basis alongside the Jersey Farm sites, Land at Little Dell Farm, and Land at Spikemead Farm. The sites have been considered above on a collective basis with others under the Jersey Farm Business Park banner. This assessment specifically considers the two sites referred to as Land at Poles Lane (Sites A and B). These sites, although promoted individually, are located in close proximity, and are subject to similar sustainability opportunities and constraints. They are therefore assessed jointly. The sites are located north of Jersey Farm Site C and immediately west of the promoted Little Dell Farm sites. The sites are situated within the area of land that is safeguarded from development for a potential future southern runway at Gatwick Airport, on land shown in the Gatwick Airport Master Plan as being required to accommodate the physical land take needed for a southern runway and other operational requirements.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Mitigate Climate Change & Local Pollution	The sites are situated beyond the Built up Area Boundary in a countryside location and represent greenfield land. New employment development at these sites would involve a loss of countryside land and were these to come forward in isolation to the other sites promoted by Vail Williams, would be isolated from Manor Royal and County Oak. The greenfield nature of the sites provides some scope to mitigate climate change impacts through sustainable new built development. Negative Impact (-)
2. Adapt to Climate Change	The sites are situated beyond the Built up Area Boundary in a countryside location. New employment development at these sites would involve a loss of countryside land and were these to come forward separately to other sites promoted by Vail Williams, would be isolated from Manor Royal and County Oak. Development could offer scope to respond positively to climate change through the planning process, but employment development of these sites on a standalone basis reduces the scope to link into wider sustainability benefits at Manor Royal. The sites are located within Flood Zone 1 (low probability), with small areas of both sites subject to risk of surface water flooding. A significant area of land at the south of Site A is situated in the Southern water Sussex North Water Resource Zone and would be subject to the requirements of water neutrality but also presenting opportunities for water efficiency measures to offset water use. Negative Impact (-)
3. Protect and/or Enhance the Built Environment	The Local Plan is clear that appropriate extensions to Manor Royal will be supported, though were these sites to come forward in isolation, that objective would not be achieved care of their separation from the existing main employment area. This separation would result in an incongruous urbanisation. Residential dwellings are located immediately west of the sites, and whilst acknowledging that there are two master plans for the site (one with development north and south of the main access road, and a second with development only to the south) these buildings may be particularly affected. Two listed buildings, Grove Cottage and Knight's Acre, are located adjacent to the sites. Versions of the master plan show alternative layouts, including one that would result in the loss of the listed Grove Cottage on Jersey Farm Site C. Careful master planning would be required to avoid harm to the setting of these buildings, though this will likely be more challenging to achieve were the Land at Poles Lane sites to come forward separately to the promoted Jersey Farm Business Park master plan. Negative Impact (-)
4. Decent/ Affordable Homes	The site would not be appropriate for residential development due to the impact of aircraft noise should a future southern runway progress at Gatwick Airport, and identification of the site for employment land will not therefore impact on the delivery of new homes. There are some residential properties located adjacent to the identified site, including those within the promoted site itself. Although the number of dwellings impacted would be relatively limited, those properties bordering the site would appear likely to be particularly affected. Possible

SA Objective	Commentary and/or Impact
	Negative or Slight Negative Impact (-?)
5. Maintain/ Support Employment	These sites would add to the overall employment land supply pipeline but would not on a standalone basis be of a sufficient scale to meet Crawley's employment land needs. Employment development at these sites in isolation of the wider master planned scheme, whilst capable of contributing to the overall employment land supply, would be isolated from other main employment areas, and without companion sites, do not represent a logical location for new employment land. Critically, the sites are situated on land that is required to be safeguarded, specifically on land that would accommodate the physical land take for a potential southern runway and supporting infrastructure, meaning that development would prejudice delivery of a southern runway should this be required preventing future expansion of the airport and the employment growth this would generate. Possible Positive or Slight Positive Impact (+?)
6. Conserve/ Enhance Biodiversity and Landscape	The site is situated within the countryside (Upper Mole Farmlands Rural Fringe landscape character area) though is not itself subject to specific environmental designations. Development for employment use could have a negative impact on biodiversity, landscape features, flora and fauna, and would need to comply with future requirements to deliver Biodiversity Net Gain, presenting the opportunity to enhance habitats and landscape features. Development on a standalone basis would result in an urbanising effect that is not clearly linked to the urban area, resulting in an incongruous development that undermines the countryside location. For the collective Jersey Farm Business Park promoted site, the promoter has submitted an indicative master plan setting out how scheme layout may be able to address these concerns, though it is not clear how this would be addressed were the sites to come forward in isolation from the master planned scheme. Possible Negative or Slight Negative Impact (-?)
7. Promote Sustainable Journeys	Industrial and warehouse-led employment development would increase traffic movements through both site operation and the creation of jobs, therefore increasing the need to travel. In the absence of companion sites at Little Dell Farm and/or Jersey Farm, there is no clear link to the sites from Manor Royal, and no very limited opportunity to effectively link into existing sustainable transport networks. The sites fall within the Area of Search for a Western Multi-Modal Transport Link, and the site promoter has submitted an indicative master plan showing how a scheme across the promoted sites may be able to achieve complementarity with this approach. However, development of the sites on a standalone basis would present clear sustainable access challenges. Further, such development would place significant pressure on the rural road network to potentially access sites. Negative Impact (-)
8. Provide Sufficient Infrastructure	It is possible that opportunities may exist to access the site longer-term via a western Crawley multi-modal link road, potentially avoiding development exacerbating existing traffic congestion at County Oak. However, its isolation and the smaller scale of this site potentially limits the opportunity for the provision of appropriate infrastructure to serve the development and possibly wider needs. Critically, the site cannot be allocated due to the requirement to retain safeguarding, as it is predominantly located on land that is needed for the physical land take of a southern runway, road diversions and other operational uses should this be required. Therefore, there is risk that the potential delivery of nationally significant infrastructure, in the form of a southern runway, would be prejudiced were this site to come forward. Significant Negative Impact (--)
9. Promote Sustainable Communities and encourage active lifestyles.	The sites are separated from Manor Royal, increasing the need to travel by private vehicle. The presence of employment development in these locations is likely to represent a significant incursion into the countryside, potentially more so than for other sites that have a closer relationship with the existing main employment areas. Negative Impact (-)
Conclusions	The site is not of a sufficient size and scale to accommodate an industrial and warehouse-led Strategic Employment Location and would not therefore be capable of meeting Crawley's employment land requirements on a comprehensive basis, potentially necessitating the need to identify additional sites. Although the sites are located within proximity of Manor Royal, and could add to the available employment land

SA Objective	Commentary and/or Impact
	<p>supply, they are separate from the main employment area and in isolation would not benefit from a logical access to Manor Royal. Although the sites would appear to be subject to relatively few environmental designations, there would be an impact on landscape character due to the urbanising effect development would have. Critically, the sites are located on land that is required to be safeguarded for a possible southern runway at Gatwick Airport, being situated directly on land that is required for the physical land take of a runway and operational uses. Allocation of these sites would therefore prejudice the potential delivery of a southern runway at Gatwick Airport, contrary to national policy. Therefore, the sites are unable to meet Crawley's employment needs on an individual or collective basis.</p>

Assessment of Rejected Employment Sites

Site Name: Land at Spikemead Farm

Site Potential Designation: Industrial (Class B2) and Warehouse (Class B8) led Strategic Employment Location

Site Description: The site (3.67ha) is promoted by Vail Williams on behalf of Ardmore and is one of eight sites put forward on an individual or collective basis for flexible business use. It falls within the Upper Mole Farmlands Rural Fringe landscape character area, though is significantly isolated from other sites promoted for employment, being located further north into the countryside. The site does not form part of the collective master planned Jersey Farm Business Park comprises of other sites promoted by Vail Williams and is therefore assessed only on an individual basis. The west of the site is significantly affected by Flood Zones 2 and 3, and much of the western half of the site is subject to risk of surface water flooding. The Listed Spikemead Farmhouse borders the site. The site is also located within the area of land that is safeguarded from development for a potential future southern runway at Gatwick Airport, on land shown in the Gatwick Airport Master Plan as being required to accommodate the physical land take needed for a southern runway and other operational requirements.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Mitigate Climate Change & Local Pollution	The site is situated beyond the Built up Area Boundary in a countryside location, significantly to the north of Manor Royal and separate from the designated main employment areas and other sites promoted for employment. Given the isolated nature of the site away from public transport links and the existing main employment areas, and its likely access via the rural road network, its designation for employment would increase the need to travel. The greenfield nature of the site provides scope to mitigate climate change impacts through sustainable new built development, but its isolated nature significantly reduces the opportunity for sustainability measures such as linking into the existing sustainable transport network or opportunity areas for district energy networks. Significant Negative Impact (--)
2. Adapt to Climate Change	The site is situated beyond the Built up Area Boundary in a countryside location, significantly to the north of Manor Royal and separate from the designated main employment areas. Given the isolated nature of the site away from public transport links and the existing main employment areas, and its likely access via the rural road network, it does not represent a sustainable location for new employment development to meet Crawley's needs. The west of the site is significantly affected by Flood Zones 2 and 3, and much of the western half of the site is subject to risk of surface water flooding. The site is located outside of the Southern Water Sussex North Water Resource Zone and is not therefore subject to water neutrality constraints. Whilst the greenfield nature of the sites provides some scope to mitigate climate change impacts through sustainable new built development, this does not offset the significantly isolated located and the high risk of flooding. Significant Negative Impact (--)
3. Protect and/or Enhance the Built Environment	Employment development at this site, given its significant isolation from other main employment areas and the wider urban area, would result in an incongruous urbanisation and intensification of use in a countryside location. Residential dwellings are located immediately north and south of the site, and these buildings may be particularly affected. The Listed Spikemead Farmhouse borders the site, and impact on listed building and its setting would need to be carefully considered. Negative Impact (-)
4. Decent/ Affordable Homes	The site would not be appropriate for residential development due to the impact of aircraft noise should a future southern runway progress at Gatwick Airport, and identification of the site for employment land will not therefore impact on the delivery of new homes. There are some residential properties located adjacent to the identified site, including within the promoted site itself. Although the number of dwellings impacted would be relatively limited, those properties bordering the site would appear likely to be particularly affected. Possible Negative or Slight Negative Impact (-?)
5. Maintain/ Support Employment	Identification of the site for employment use would add to the available supply pipeline of employment land, though would not on a standalone basis be of a sufficient scale to meet Crawley's employment land needs. Its isolated location away from other main

SA Objective	Commentary and/or Impact
	employment areas would mean that it has little by way of connectivity with Crawley's wider economy. Further, given the location of the site on land that forms part of the physical land take for a potential southern runway and operational uses, allocation of the site would prejudice delivery of a southern runway should this be required preventing future expansion of the airport and the employment growth this would generate. The economic benefits of allocating the site are not therefore considered to outweigh the wider site constraints. Possible Positive or Slight Positive Impact (+?)
6. Conserve/ Enhance Biodiversity and Landscape	The site is not subject to specific environmental designations, though is situated within the countryside and falls within the Upper Mole Farmlands Rural Fringe landscape character area. A biodiversity opportunity area is located to the west of the site. Development for employment use could have a negative impact on biodiversity, landscape features, flora and fauna, and would need to comply with future requirements to deliver Biodiversity Net Gain, presenting the opportunity to enhance habitats and landscape features. Development on a standalone basis would however result in an urbanising effect that is not clearly linked to other main employment areas and would result in an incongruous development that undermines the countryside location. Possible Negative or Slight Negative Impact (-?)
7. Promote Sustainable Journeys	Industrial and warehouse-led employment development would increase traffic movements through both site operation and the creation of jobs, therefore increasing the need to travel. There is no suitable link to the site from the main road network, nor is there an effective opportunity to link into existing sustainable transport networks. Given the location of the site away from public transport, it is likely that those accessing the site will need to travel by private vehicle. As such, there is risk that employment use at this site could result in a significant intensification of commercial traffic on the rural network. Significant Negative Impact (--)
8. Provide Sufficient Infrastructure	The site is significantly separated from other main employment areas, and given its isolated rural location, its allocation for employment is likely to significantly increase commercial traffic on the rural road network. The smaller scale of this site potentially limits the opportunity for the provision of infrastructure to serve the site and possibly wider needs. Furthermore, the site cannot be allocated due to the requirement to retain safeguarding, as it is located on land that is needed for the physical land take of a southern runway, should this be required. Therefore, there is risk that the delivery of nationally significant infrastructure, in the form of a southern runway, would be prejudiced were this site to come forward. Significant Negative Impact (--)
9. Promote Sustainable Communities and encourage active lifestyles.	Employment development at this isolated site would result in significant incursion into the countryside and would place development in an area of flood risk. It is significantly isolated from Crawley's neighbourhoods, limiting the opportunity to promote active travel links and increasing the need to travel by private vehicle. Negative Impact (-)
Conclusions	The site is not of a sufficient size and scale to accommodate an industrial and warehouse-led Strategic Employment Location and would not therefore be capable of meeting Crawley's employment land requirements on a comprehensive basis, potentially necessitating the need to identify additional sites. Given the isolated countryside location of the site away from the designated main employment areas, its reliance on the rural road network, and its urbanising effect on the countryside, the impacts of employment development are likely to have a negative impact in sustainability terms. The presence of Flood Zones 2 and 3 on the site raise further sustainability concerns, particularly having regard to the future management of climate change impact. Critically, the site is situated on safeguarded land that is directly required for the physical land take of the runway and operational uses. Allocation of the site would therefore prejudice the potential delivery of a southern runway at Gatwick Airport, contrary to national policy.

Assessment of Rejected Employment Sites

Site Name: Land South of Southways

Site Potential Designation: Industrial (Class B2) and Warehouse (Class B8) led Strategic Employment Location

Site Description: The site (3.13ha) is promoted by Arora Group, potentially for office development as an extension to the extant Southways permission to the north. It is located to the north of the promoted Jersey Farm Business Park (though does not form part of that site), fronting onto London Road, in a countryside location beyond the Built-up Area Boundary. The site is also located within the area of land that is safeguarded from development for a potential future southern runway at Gatwick Airport, on land shown in the Gatwick Airport Master Plan as being required to accommodate the physical land take needed for a southern runway and other operational requirements.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Mitigate Climate Change & Local Pollution	The site is situated beyond the Built up Area Boundary in a countryside location within the Upper Mole Farmlands Rural Fringe landscape character area. The site is located to the north of Manor Royal main employment area, though given that it does not adjoin Manor Royal, it would not on a standalone basis represent an extension to the existing main employment area. It is also located south of the technically commenced Southways office development. Given its London Road fronting location and relative proximity to Manor Royal, the site is broadly accessible by public transport, with direct access onto the A23. The greenfield nature of the site provides some scope to mitigate climate change impacts through sustainable new built development. Possible Positive or Slight Positive Impact (+?)
2. Adapt to Climate Change	The site is situated to the north of Manor Royal main employment area, though given that it does not adjoin Manor Royal, it would not on a standalone basis represent an extension to the existing main employment area. It is also located south of the technically commenced Southways office development. Given its London Road location and relative proximity to Manor Royal, the site is broadly accessible by public transport, with direct access onto the A23. The site is located within Flood Zone 1 (low probability) though some parts of the site are subject to risk of surface water flooding. The site is located outside of the Southern Water Sussex North Water Resource Zone and is not therefore subject to water neutrality constraints. The greenfield nature of the site provides some scope to mitigate climate change impacts through sustainable new built development, though an element of separation from Manor Royal may reduce opportunities to link into its District Energy Network priority area. Possible Positive or Slight Positive Impact (+?)
3. Protect and/or Enhance the Built Environment	Local Plan policy requires that the principles of good design are adhered to, and new development would need to have regard to its surroundings, including its relationship with the countryside, and enhance the overall aesthetics of the built environment. Although the site is located close to Manor Royal, it is separated from the existing main employment area by the Land at Little Dell Farm land parcel. As such, it is only likely to represent a logical extension to Manor Royal were land to the south also to come forward. The northward extension of Manor Royal along London Road is likely to have an urbanising effect and would require careful landscaping, particularly were the site to come forward in isolation. There are few residential dwellings that would be affected were the site to come forward, other than those forming part of the promoted Little Dell Farm sites to the south. The Listed Gatwick Manor and Hyders Hall are located east of the site across London Road. Possible Negative or Slight Negative Impact (-?)
4. Decent/ Affordable Homes	The site would not be appropriate for residential development due to the impact of aircraft noise should a future southern runway progress at Gatwick Airport, and identification of the site for employment land will not therefore impact on the delivery of new homes. There are few residential dwellings that would be affected were the site to come forward, with those existing forming part of the promoted Little Dell Farm Sites to the south. Neutral Impact (/)
5. Maintain/ Support	The site would add to the overall employment land supply pipeline but would not on a standalone basis be of a sufficient scale to meet

SA Objective	Commentary and/or Impact
Employment	Crawley's employment land needs. The site's location close to Manor Royal means it would be relatively well placed to support and complement Manor Royal, though the site would on a standalone basis be disconnected from the existing main employment area. There is a quantitative surplus of office land in Crawley, though if promoted for office use the site may be able to add to the qualitative need for Grade A office floorspace. A key issue remains that the site is situated on land that is required to be safeguarded, specifically on land that would accommodate the physical land take for a potential southern runway and supporting infrastructure, meaning that development would prejudice delivery of a southern runway should this be required preventing future expansion of the airport and the employment growth this would generate. Positive Impact (+)
6. Conserve/ Enhance Biodiversity and Landscape	The site is situated within the countryside (Upper Mole Farmlands Rural Fringe landscape character area) though is not itself subject to specific environmental designations. Development for employment use could have a negative impact on biodiversity, landscape features, flora and fauna, and would need to comply with future requirements to deliver Biodiversity Net Gain, presenting the opportunity to enhance habitats and landscape features. Development would potentially result in an urbanising effect northward and would likely appear somewhat incongruous were it to proceed on a standalone basis. Possible Negative or Slight Negative Impact (-?)
7. Promote Sustainable Journeys	Industrial and warehouse-led employment development would increase traffic movements through both site operation and the creation of jobs, therefore increasing the need to travel. The proximity of the site to Manor Royal may represent an opportunity to link into existing sustainable transport networks to promote sustainable journeys, and its fronting onto London Road presents an advantage. Possible Positive or Slight Positive Impact (+?)
8. Provide Sufficient Infrastructure	The site is located close to Manor Royal, fronting onto London Road, which presents opportunities to link into Manor Royal's infrastructure. The smaller scale of this site potentially limits the opportunity for the provision of infrastructure to serve the site and possibly wider needs. However, the site cannot be allocated due to the requirement to retain safeguarding, as it is predominantly located on land that is needed for the physical land take of a southern runway, road diversions and other operational uses should this be required. Therefore, there is risk that the potential delivery of nationally significant infrastructure, in the form of a southern runway, would be prejudiced were this site to come forward. Significant Negative Impact (--)
9. Promote Sustainable Communities and encourage active lifestyles.	Employment development at the site would partially adjoin Manor Royal, and there may be opportunities to link into existing sustainable transport links. The presence of employment development, if coming forward on a standalone basis, is likely to have a significant urbanising effect through incursion into the countryside, impacting negatively upon the visual gap between Manor Royal and Gatwick Airport, potentially more so than for other sites that have a closer relationship with the existing main employment areas. Possible Positive or Slight Positive Impact (+?)
Conclusions	The site is not of a sufficient size and scale to accommodate an industrial and warehouse-led Strategic Employment Location and would not therefore be capable of meeting Crawley's employment land requirements on a comprehensive basis, potentially necessitating the need to identify additional sites. Although the site is subject to fewer environmental designations than is the case for other sites, there would be an impact on landscape character due to the westward extension for development and the urbanising effect this would have. Critically, the site is located on safeguarded land that is directly required for the physical land take of a possible southern runway and operational uses. Allocation of the site would therefore prejudice the potential delivery of a southern runway at Gatwick Airport, contrary to national policy.

Assessment of Rejected Employment Sites

Site Name: Land West of Buttermere Close

Site Potential Designation: Employment Land

Site Description: The site (3.14ha) is promoted by Pegasus Group of behalf of Persimmon. It is advised to be available for development, though the promoter has not specified if the site is being promoted for residential or employment use. The site is situated within the Forge Wood neighbourhood allocation, though is not identified for housing. It represents an area of open space, with structural landscaping bordering the site to the east and west. This assessment considers the scope for employment use at the site.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Mitigate Climate Change & Local Pollution	The site is located inside Crawley's built up area, within the new residential neighbourhood of Forge Wood. It is located close to the Forge Wood employment land, with Manor Royal located to its west, separated from the latter by the London to Brighton main railway line. The site benefits from Forge Wood's associated neighbourhood facilities, transport (including bus) connections, open space and other local infrastructure. Forge Wood is identified as a Priority Area for District Energy Networks. Possible Positive or Slight Positive Impact (+?)
2. Adapt to Climate Change	The site is currently greenfield and development of this site would increase the extent of hard surfacing. The site is mainly located in Flood Zone 1, but there is some risk of surface water flooding at the site. The site is situated outside of Sussex North Water Resource Zone and is not subject to water neutrality. Neutral Impact (/)
3. Protect and/or Enhance the Built Environment	The site is currently largely clear of buildings. The neighbouring residential area to the south is not especially sensitive in terms of character. However, the area to the north is more sensitive owing to the presence of designated and undesignated heritage assets along Tinsley Green, as well as the low density character of this area. The close proximity of residential properties would need to be carefully considered in terms of amenity were employment use to be proposed. It is possible that potential impacts could in part be mitigated through screening. Possible Negative or Slight Negative Impact (-?)
4. Decent/ Affordable Homes	The site is unsuitable for residential development owing to its exposure to unacceptable noise impacts in the event of a new southern runway being established at Gatwick Airport. Identification of the site for employment land would not therefore impact on the delivery of new homes. Neutral Impact (/)
5. Maintain/ Support Employment	Identification of the site for employment use would add to the overall employment land supply pipeline. The site is not of a sufficient size and scale to accommodate an industrial and warehouse-led Strategic Employment Location, and would not therefore be capable of meeting Crawley's employment land requirements on a comprehensive basis, potentially necessitating the need to identify additional sites. Positive Impact (+)
6. Conserve/ Enhance Biodiversity and Landscape	Given that this is a greenfield site there is some biodiversity value, although this is likely to be sufficiently low that the impact should be able to be mitigated. The site also has some landscape value as part of the setting of Forge Wood Neighbourhood and Tinsley Green, which would likely be affected. Structural landscaping surrounds the site, though it is not itself identified with this designation. Possible Negative or Slight Negative Impact (-?)
7. Promote Sustainable Journeys	The site is part of the Forge Wood neighbourhood development, and benefits from proximity to the existing neighbourhood-scale employment provision, with bus connectivity and access to walking and cycling links which serve the wider neighbourhood. Positive Impact (+)
8. Provide Sufficient	The acceptability of highway access (whether through the estate to the south or to Tinsley Green to the north) for employment use would

SA Objective	Commentary and/or Impact
Infrastructure	need to be established. The site benefits from access to the supporting infrastructure that is in place to support the Forge Wood neighbourhood. It is situated outside of the Gatwick Airport Safeguarding Land, so would not impact upon the future delivery of a possible southern runway. Uncertain Impact (?)
9. Promote Sustainable Communities and encourage active lifestyles.	The site is located within a wider residential neighbourhood, with associated benefits in terms of sustainable communities and active lifestyles. Employment development of the site would however result in a loss of open space. Possible Positive or Slight Positive Impact (+?)
Conclusions	Employment development of site could potentially add to the overall employment land supply pipeline in Crawley, though the site is not of a sufficient scale to meet Crawley's strategic employment land requirements. It is uncertain whether the land is being promoted for employment development, so the site cannot be added to the employment land supply pipeline without further information.

Assessment of Rejected Employment Sites


Site Name: Land South of Tinslow Farm

Site Potential Designation: Employment

Site Description: The site (0.25ha) is promoted by Pegasus Group on behalf of Persimmon. It is advised to be available for development, though the promoter has not specified if the site is being promoted for residential or employment development. It is situated within the Forge Wood neighbourhood allocation, though is not identified for housing. A number of residential properties are situated south of the site, with the Listed Tinslow Farmhouse located to the north on Steers Lane. The site is subject to various environmental designations and constraints.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Mitigate Climate Change & Local Pollution	The site is located inside Crawley's built up area, within the new residential neighbourhood of Forge Wood. The site would benefit from access to Forge Wood's neighbourhood facilities, transport (including bus) connections, open space and other local infrastructure. Forge Wood neighbourhood is designated as a Priority Area for District Energy Networks. Possible Positive or Slight Positive Impact (+?)
2. Adapt to Climate Change	The site is subject to risk of flood (Flood Zone 2 and partly Flood Zone 3a), presenting a key development constraint. The site is also currently greenfield and development of this site would increase the extent of hard surfacing. The site is situated outside of Sussex North Water Resource Zone and is not subject to water neutrality. Negative Impact (-)
3. Protect and/or Enhance the Built Environment	The site is currently largely clear of buildings. The area to the north has some sensitivity owing to the presence of the Listed Tinslow Farmhouse, and it is likely that employment development of an allocatable scale on the site would have some impact on the setting of this building. Possible Negative or Slight Negative Impact (-?)
4. Decent/ Affordable Homes	The site is unsuitable for residential development owing to its exposure to unacceptable noise impacts in the event of a new southern runway being established at Gatwick Airport. Identification of the site for employment would not therefore impact on the delivery of new homes. Neutral Impact (/)
5. Maintain/ Support Employment	Identification of the site for employment use would add to the overall employment land supply pipeline, though given the small site area any contribution is likely to be limited. The site is not of a sufficient size and scale to accommodate an industrial and warehouse-led Strategic Employment Location, and would not therefore be capable of meeting Crawley's employment land requirements on a comprehensive basis, potentially necessitating the need to identify additional sites. Possible Positive or Slight Positive Impact (+?)
6. Conserve/ Enhance Biodiversity and Landscape	The site is nearly all structural landscaping, so development here would have some negative landscape impact. The site is likely to have some biodiversity value in its current state, although this is likely to be sufficiently low that the impact should be able to be mitigated. Negative Impact (-)
7. Promote Sustainable Journeys	The site is part of the Forge Wood neighbourhood development, and benefits from proximity to the existing neighbourhood-scale employment provision, with bus connectivity and access to walking and cycling links which serve the wider neighbourhood. Positive Impact (+)
8. Provide Sufficient Infrastructure	The acceptability of highway access for employment use would need to be established. The site benefits from access to the supporting infrastructure that is in place to support the Forge Wood neighbourhood. It is situated outside of the Gatwick Airport Safeguarding Land, so would not impact upon the future delivery of a possible southern runway. Uncertain Impact (?)
9. Promote Sustainable	The site is located within a wider residential neighbourhood, with associated benefits in terms of sustainable communities and active lifestyles. Employment development of the site would however result in a loss of open space. Possible Positive or Slight Positive Impact

SA Objective	Commentary and/or Impact
Communities and encourage active lifestyles.	(+) 
Conclusions	The site is subject to environmental designations and constraints that limit its suitability for development. The site is not of a sufficient scale to meet Crawley's strategic employment land requirements, and development would be unlikely to add significantly to the available employment land supply pipeline.

Assessment of Rejected Employment Sites

Site Name: Land South of Radford Road

Site Potential Designation: Employment

Site Description: The site (0.82ha) is promoted by Pegasus Group on behalf of Persimmon. It is advised to be available for development, though the promoter has not specified if the site is being promoted for residential or employment development. It is situated within the Forge Wood neighbourhood allocation, though is not identified for housing. The site is subject to a number of environmental designations and constraints.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Mitigate Climate Change & Local Pollution	The site is located inside Crawley's built up area, within the new residential neighbourhood of Forge Wood. The site would benefit from access to Forge Wood's neighbourhood facilities, transport (including bus) connections, open space and other local infrastructure, though is located further from these assets than some of the other promoted Forge Wood land parcels. Forge Wood neighbourhood is designated as a Priority Area for District Energy Networks. Possible Positive or Slight Positive Impact (+?)
2. Adapt to Climate Change	The site is currently greenfield and development of this site would increase the extent of hard surfacing. The site is predominantly in Flood Zone 1, but the area adjacent to Radford Road is in Zone 2 and there is also some risk of surface water flooding at the site. The site is situated outside of Sussex North Water Resource Zone and is not subject to water neutrality. Neutral Impact (/)
3. Protect and/or Enhance the Built Environment	The vicinity of the site has some sensitivity site in terms of the built environment owing to the prevailing low density character of development along Radford Road and Balcombe Road, and the presence of some non-designated heritage assets along Balcombe Road immediately to the east. A cluster of locally listed buildings are located to the east of the site. Possible Negative or Slight Negative Impact (-?)
4. Decent/ Affordable Homes	The site is unsuitable for residential development owing to its exposure to unacceptable noise impacts in the event of a new southern runway being established at Gatwick Airport. Identification of the site for employment would not therefore impact on the delivery of new homes. Neutral Impact (/)
5. Maintain/ Support Employment	Identification of the site for employment use would add to the overall employment land supply pipeline. The site is not of a sufficient size and scale to accommodate an industrial and warehouse-led Strategic Employment Location, and would not therefore be capable of meeting Crawley's employment land requirements on a comprehensive basis, potentially necessitating the need to identify additional sites. Positive Impact (+)
6. Conserve/ Enhance Biodiversity and Landscape	The site is heavily wooded, with the northern portion of the site comprising structural landscaping, so development would have some negative landscape impact. The site is likely to have some biodiversity value in its current state. Negative Impact (-)
7. Promote Sustainable Journeys	The site is part of the Forge Wood neighbourhood development, and benefits from proximity to the existing neighbourhood-scale employment provision, with bus connectivity and access to walking and cycling links which serve the wider neighbourhood. The site is though located further from these assets than some of the other promoted Forge Wood land parcels. Positive Impact (+)
8. Provide Sufficient Infrastructure	The acceptability of highway access for employment use would need to be established. The site benefits from access to the supporting infrastructure that is in place to support the Forge Wood neighbourhood. It is situated outside of the Gatwick Airport Safeguarding Land, so would not impact upon the future delivery of a possible southern runway. Uncertain Impact (?)
9. Promote	The site is located within a wider residential neighbourhood, with associated benefits in terms of sustainable communities and active

SA Objective	Commentary and/or Impact
Sustainable Communities and encourage active lifestyles.	lifestyles. Employment development of the site would however result in a loss of open space. Possible Positive or Slight Positive Impact (+?)
Conclusions	The site is subject to environmental designations and constraints that limit its suitability for development. The site is not of a sufficient scale to meet Crawley's strategic employment land requirements, and development would be unlikely to add significantly to the available employment land supply pipeline.

Assessment of Rejected Employment Sites

Site Name: Land at Black Corner

Site Potential Designation: Employment

Site Description: The site (5.45ha) is promoted by Pegasus Group on behalf of Persimmon. It is advised to be available for development, though the promoter has not specified if the site is being promoted for residential or employment development. It is situated within the Forge Wood neighbourhood allocation, though is not identified for housing. The site is situated close to existing properties along Balcombe Road and is subject to environmental designations and constraints.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Mitigate Climate Change & Local Pollution	The site is located inside Crawley's built up area, within the new residential neighbourhood of Forge Wood, which provides neighbourhood facilities, transport (including bus) connections, open space and other local infrastructure. However, the site is located some distance from these facilities, without any clear access, likely increasing the need to travel by private vehicle. Forge Wood neighbourhood is designated as a Priority Area for District Energy Networks. Any harm to the Ancient Woodland on the site would also have negative implications from the perspective of climate change mitigation. Negative Impact (-)
2. Adapt to Climate Change	The site is currently greenfield and development of this site would increase the extent of hard surfacing, while harm to the Ancient Woodland on site could negatively impact its specific functions in terms of Flood Risk management and evaporative cooling. The site is mainly located in Flood Zone 1, but there is some risk of surface water flooding at the site. The site is situated outside of Sussex North Water Resource Zone and is not subject to water neutrality. Uncertain Impact (?)
3. Protect and/or Enhance the Built Environment	The vicinity of the site has some sensitivity site in terms of the built environment owing to the prevailing low density character of development along Balcombe Road, which includes some non-designated heritage assets. It may be possible to reduce the impact through screening, although this would depend in part on the configuration of highway access. Possible Negative or Slight Negative Impact (-?)
4. Decent/ Affordable Homes	The site is unsuitable for residential development owing to its exposure to unacceptable noise impacts in the event of a new southern runway being established at Gatwick Airport. Identification of the site for employment would not therefore impact on the delivery of new homes. Neutral Impact (/)
5. Maintain/ Support Employment	Identification of the site for employment use would add to the overall employment land supply pipeline. The site is not of a sufficient size and scale to accommodate an industrial and warehouse-led Strategic Employment Location, and would not therefore be capable of meeting Crawley's employment land requirements on a comprehensive basis, potentially necessitating the need to identify additional sites. Positive Impact (+)
6. Conserve/ Enhance Biodiversity and Landscape	The site abuts the North East Crawley rural fringe along its northern boundary, with an area of structural landscaping bordering the site to its west. It is largely greenfield. A significant proportion of the site comprises Ancient Woodland, with further Ancient Woodland and protected trees/structural landscape lying adjacent to the west. Any development at the site would need to avoid harm to these designations and their functions, which may mean that the developable area and means of access are limited. Negative Impact (-)
7. Promote Sustainable Journeys	The wider neighbourhood benefits from bus connectivity and access to walking and cycling links, although these are some distance from the site, and the means of accessing these remains unclear. Uncertain Impact (?)
8. Provide Sufficient Infrastructure	The site currently has no identified means of access to the public highway and any proposed access (e.g. via the future Forge Wood Phase 4B to the south) would need to be assessed. Whilst forming part of the Forge Wood neighbourhood, it has no clear means of access to

SA Objective	Commentary and/or Impact
	supporting neighbourhood facilities. It is situated outside of the Gatwick Airport Safeguarding Land, so would not impact upon the future delivery of a possible southern runway. Uncertain Impact (?)
9. Promote Sustainable Communities and encourage active lifestyles.	The site would be located within a wider residential neighbourhood, with associated benefits in terms of sustainable communities and active lifestyles. However, the means of accessing wider facilities and links remains uncertain. Uncertain Impact (?)
Conclusions	The site is within the new Forge Wood Neighbourhood, but is currently separated from the supporting facilities of the neighbourhood with no clear means of accessing these. The presence of ancient woodland would mean that development is unlikely to be acceptable for a large part of the site, with the site also constrained by biodiversity and/or landscape assets.

Assessment of Rejected Employment Sites

Site Name: Additional Land South East of Heathy Farm

Site Potential Designation: Employment

Site Description: The site (3.31ha) is promoted by Pegasus Group on behalf of Persimmon. It is advised to be available for development, though the promoter has not specified if the site is being promoted for residential or employment development. It is situated within the Forge Wood neighbourhood allocation at its south-east corner, though is not identified for housing. The site is subject to a number of environmental designations and constraints.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Mitigate Climate Change & Local Pollution	The site is within the new residential neighbourhood of Forge Wood, which benefits from the associated neighbourhood facilities, transport (including bus) connections, open space and other local infrastructure. The site is though located some distance further from these facilities than other Forge Wood promoted land parcels, potentially increasing the need to travel by private vehicle. Forge Wood neighbourhood is designated as a Priority Area for District Energy Networks. Development would result in a significant loss of tree cover on the site, including harm to Ancient Woodland and structural landscaping, which would also have negative implications from the perspective of climate change mitigation. Negative Impact (-)
2. Adapt to Climate Change	The site is currently greenfield and development of this site would increase the extent of hard surfacing, while harm to the Ancient Woodland on site could negatively impact its specific functions in terms of Flood Risk management and evaporative cooling. The site is mainly located in Flood Zone 1, but there is some risk of surface water flooding at the site. The site is situated outside of Sussex North Water Resource Zone and is not subject to water neutrality. Uncertain Impact (?)
3. Protect and/or Enhance the Built Environment	The site is currently clear of buildings and the wider setting remains rural, albeit that the neighbouring site to the north is proposed for allocation for housing. The area is heavily wooded and is identified as structural landscaping, including a large area of ancient woodland that provides important setting to the housing development to the north. It is possible that development could be screened to help protect the amenity of residential. Possible Negative or Slight Negative Impact (-?)
4. Decent/ Affordable Homes	The site would not be subject to unacceptable noise impacts from aviation noise in the event of a new southern runway being established at Gatwick Airport. However, given the proximity of the site to the M23, noise from surface transport sources is likely to represent a key constraint to development. Identification of the site for employment would therefore be unlikely to impact on the delivery of new homes. Neutral Impact (/)
5. Maintain/ Support Employment	Identification of the site for employment use would add to the overall employment land supply pipeline. The site is not of a sufficient size and scale to accommodate an industrial and warehouse-led Strategic Employment Location, and would not therefore be capable of meeting Crawley's employment land requirements on a comprehensive basis, potentially necessitating the need to identify additional sites. Positive Impact (+)
6. Conserve/ Enhance Biodiversity and Landscape	The site is entirely covered with mature trees, with a significant part of the site designated as ancient woodland. The site is identified as structural landscaping, and abuts the North East Crawley rural fringe along its eastern boundary. This represents a significant constraint to the scope for development. Negative impact (-)
7. Promote Sustainable Journeys	The wider neighbourhood benefits from bus connectivity and access to walking and cycling links, although the means of accessing these from the site is unclear, given the constraints on the site. Uncertain Impact (?)
8. Provide Sufficient	Any proposed access (whether direct to Balcombe Road or via the proposed development to the north) would need to be assessed. Whilst

SA Objective	Commentary and/or Impact
Infrastructure	forming part of the Forge Wood neighbourhood, it has no clear means of access to supporting neighbourhood facilities. It is situated outside of the Gatwick Airport Safeguarding Land, so would not impact upon the future delivery of a possible southern runway. Uncertain Impact (?)
9. Promote Sustainable Communities and encourage active lifestyles.	The site would be located within a wider residential neighbourhood, with associated benefits in terms of sustainable communities and active lifestyles. However, the means of accessing wider facilities and links remains uncertain, given the wider site constraints. There presence of ancient woodland would appear to constrain access to the highway. Uncertain Impact (?)
Conclusions	Given the significant site constraints, particularly those posed by the structural land designation and the presence of ancient woodland, it is unlikely that the site could be brought forward for development.

Assessment of Rejected Employment Sites

Site Name: Land at Fernlands

Site Potential Designation: B2/B8 Employment Land. The site (8.8ha) is promoted by LRM Planning Ltd on behalf of WT Lamb Properties, Staminier Group & Elliott Metals/the Simmonds family. The site was initially promoted at the first Reg. 19 consultation for airport parking, though that is superseded by the current representation promoting the site for B2/B8 industrial use. The site is not promoted as an alternative to Gatwick Green. Rather, the submission explains that the land is promoted as an extension to, or alternatively a more logical site configuration for, the Gatwick Green site proposed allocation.

Site Description: The site is located in the north-east of Crawley in a countryside location, to the east of Gatwick Airport and Balcombe Road, and north of Fernhill Road, with the proposed Gatwick Green allocation bounding the site to its north, south and east. It comprises land formerly used as a commercial nursery (including associated structures), fields in agricultural use, and a further field to the rear of the existing metal recycling business. A residential bungalow (proposed to be demolished) is situated on the site, and a small number of residential and employment buildings border the site along Balcombe Road, Fernhill Road, and Donkey Lane.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Mitigate Climate Change & Local Pollution	<p>The site is located in the north-east of Crawley in a countryside location, to the east of Gatwick Airport and Balcombe Road, and north of Fernhill Road, with the proposed Gatwick Green allocation bounding the site to its north, south and east. Further north, across the M23 spur in Reigate & Banstead Borough, is the site of the Horley Strategic Business Park allocation. These may present opportunities to link in with and improve existing sustainable transport connections and were Land at Fernlands to come forward on a comprehensive basis with Gatwick Green, opportunities would exist to link into wider sustainable transport improvements that are proposed as part of the wider Gatwick Green site. Were Land at Fernlands to come forward on a standalone basis it is uncertain whether these sustainable transport benefits could be realised. As is the case for Gatwick Green, the promoted site is somewhat separated from Crawley's other Main Employment Areas and established residential areas, potentially increasing the need to travel by private vehicle, whilst the storage & distribution-led nature of operations will lead to an increase in traffic movements. Other employment sites promoted through the Local Plan process represent more sustainable options, including those adjacent to Manor Royal, but these cannot be progressed due to the requirement to retain safeguarding and care of their location on land would be required to accommodate the physical land take of a southern runway, road diversions and other operational uses. The countryside location of the Land at Fernlands site means that its development will result in a loss of what is largely open green space. Were Land at Fernlands to come forward alongside Gatwick Green, the scale of development would present opportunities for climate change and pollution mitigation, including through the use of highly sustainable design and construction, prioritisation of sustainable transport modes, identification of the site as a Priority Area for District Energy Networks, careful master planning to ensure appropriate separation from nearby amenity sensitive uses, and wider opportunities for flood mitigation and biodiversity net gain.</p> <p>Possible Negative or Slight Negative Impact (-?)</p>
2. Adapt to Climate Change	<p>The site is situated entirely within Flood Zone 1 (low probability) although some areas at the western edge and north west of the site are subject to risk of surface water flooding. Delivery of the site for employment would result in a loss of open greenfield land. New build could be designed to a highly sustainable standard to facilitate adaptation to climate change, and if coming forward as part of a strategic employment location, could link into the identified Gatwick Green Priority Area for District Energy Networks. The site is situated outside of the Sussex North Water Resource Zone and is therefore not subject to water neutrality. The site promoter has provided information regarding an on-site well associated with the former horticultural use. Whilst this would not be able to contribute to water neutrality as it is outside of Sussex North Water Resource Zone, it may be able to support overall water efficiency within the site or potentially provide an alternative</p>

SA Objective	Commentary and/or Impact
	water supply for sites further south. Overall, it is considered that development could offer scope to respond positively to climate change through the planning process. Possible Positive or Slight Positive Impact (+?)
3. Protect and/or Enhance the Built Environment	The promoted Land at Fernlands site is located adjacent to two listed buildings at Donkey Lane and Fernhill Road. Principles of good design, appropriate landscaping and screening must be adhered to in order to ensure the setting of these buildings protected and enhanced. Clusters of residential properties and small businesses are located close to the site along Balcombe Road, Fernhill Road and Donkey Lane, and any development would need to have regard to its surroundings, including its relationship with existing properties and the countryside. Possible Negative or Slight Negative Impact (-?)
4. Decent/ Affordable Homes	The location of the site, under the flight path for Gatwick Airport, means it is unsuitable for residential development due to the impact of aircraft noise. Existing residential properties are situated close to the site, and identification of further land as an extension to Gatwick Green would increase the number of residential properties affected. The amenity of buildings would need to be protected, with an appropriate landscape buffer required to retain a sense of separation between the site and adjoining countryside and settlements. Given that the site cannot be used for residential development, its identification for employment land would not impact on the delivery of new homes. However, as is the case for Gatwick Green, the presence of residential properties located close to the site would present a clear requirement to ensure appropriate master planning to avoid negative impacts on nearby properties. Possible Negative or Slight Negative Impact (-?)
5. Maintain/ Support Employment	The Gatwick Green promoted site is of a sufficient scale to meet Crawley's identified employment needs in full, in a comprehensive manner accompanied by significant landscaping and strategic infrastructure. Although an extension to the proposed Strategic Employment Location through the promoted Land at Fernlands would add to the available employment land supply pipeline in Crawley, there is not sufficient employment need at this time to justify identification of further strategic employment land beyond the proposed Gatwick Green allocation. The Land at Fernlands has also been promoted as supporting an alternative, potentially more logical, configuration to the Gatwick Green site. Planning Practice Guidance requires that the future supply of employment land must be suitable, available and achievable. The respective Gatwick Green and Land at Fernlands site promoters are not at present working together, and without an agreed approach between the site promoters, it cannot be concluded with certainty that inclusion of Land at Fernlands into the Gatwick Green allocation, either as an extension or alternative site layout, meets the PPG requirements in full. The site has not been promoted for employment on a standalone basis but were that to be the case it would not be of a sufficient scale to meet Crawley's employment needs, nor would it offer the sustainability benefits of a comprehensive allocation. Overall, whilst the site would (if brought forward in conjunction with Gatwick Green) potentially be able to deliver a larger strategic employment location, there is not at present sufficient need for a site of that scale. Given that the site promoters are not working together, it is questionable whether promotion of Land at Fernlands as part of an alternative Gatwick Green site layout would satisfy the PPG employment land supply criteria. Positive Impact (+)
6. Conserve/ Enhance Biodiversity and Landscape	The site is not subject to any statutory landscape or nature conservation designations, but it is within the North East Crawley Rural Fringe local landscape area, and falls partly within the Gatwick Wood Biodiversity Opportunity Area, both recognised in policies in the Local Plan. Parts of the site may have slightly higher landscape values than some other sites promoted to the council through the Local Plan process, though it is recognised that aspects of the site have previously been used for commercial horticulture purposes and that remnants of this operation remain on site and may detract from its overall landscape and biodiversity value. Development of land could have a negative impact on biodiversity, landscape features, flora and fauna. If coming forward as part of Gatwick Green, the strategic size of the assembled site presents an opportunity to mitigate impacts on biodiversity or provide compensation. Any development would need to comply with requirements to deliver Biodiversity Net Gain, presenting the opportunity to enhance habitats and landscape features. Possible Negative or Slight Negative Impact (-?)

SA Objective	Commentary and/or Impact
7. Promote Sustainable Journeys	<p>The site is located in the north-east of Crawley in a countryside location, to the east of Gatwick Airport and Balcombe Road, and north of Fernhill Road, with the proposed Gatwick Green allocation bounding the site to its north, south and east. Further north, across the M23 spur in Reigate & Banstead Borough, is the site of the Horley Strategic Business Park allocation. These may present opportunities to link in with and improve existing sustainable transport connections and were Land at Fernlands to come forward on a comprehensive basis with Gatwick Green, opportunities would exist to link into wider sustainable transport improvements that are proposed as part of the wider Gatwick Green site. Were Land at Fernlands to come forward on a standalone basis it is uncertain whether these sustainable transport benefits could be realised. As is the case for Gatwick Green, the promoted site is somewhat separated from Crawley's other Main Employment Areas and established residential areas, potentially increasing the need to travel by private vehicle, whilst the storage & distribution-led nature of operations will lead to an increase in traffic movements. Other employment sites promoted through the Local Plan process represent more sustainable options, including those adjacent to Manor Royal, but these cannot be progressed due to the requirement to retain safeguarding and care of their location on land would be required to accommodate the physical land take of a southern runway, road diversions and other operational uses. The proximity to Gatwick Airport main employment area and its railway station, and the Horley Strategic Business Park allocation (RBBC) represent opportunities to link into the existing sustainable transport network, whilst the scale of the strategic development presents opportunities to provide improvements to public transport and active travel access for employees. Given the industrial and warehouse-led nature of development, it is possible that the location of the site close to Gatwick Airport and the M23 may reduce the need to access already busy routes through Crawley and Manor Royal. Uncertain (?)</p>
8. Provide Sufficient Infrastructure	<p>The site represents a countryside location that is characterised in part by small-scale pepper potted commercial and residential development. Any critical mass of larger scale employment development would create opportunity for a wider provision of infrastructure, serving the site and possibly wider needs. The scale of development and the strategic allocation at Gatwick Green offers the opportunity for innovative and high quality infrastructure to address the needs of the development and could help meet wider requirements of the borough – were the promoted site to form part of the Gatwick Green allocation it would be likely to jointly deliver the necessary improvements. However, on a standalone basis the smaller scale of this site potentially limits the opportunity for the provision of infrastructure to serve the site and possibly wider needs. As is the case for the Gatwick Green site, Land at Fernlands does not form part of the physical land take that would be required to accommodate the physical land take required for a southern runway and the diversion of the A23. It is shown in the Gatwick Airport Master Plan as being utilised for a large area of surface car parking. It is therefore possible that Land at Fernlands could in principle come forward for development as part of a wider or amended Gatwick Green site without prejudicing the delivery of a possible southern runway, though further evidence may be required. Uncertain (?)</p>
9. Promote Sustainable Communities and encourage active lifestyles.	<p>Were the site to come forward as part of a Strategic Employment Development at Gatwick Green, it would be well placed to link with the existing Main Employment Area at Gatwick Airport and the allocated Horley Strategic Business Park, as well as wider sustainable transport benefits that would be deliverable due to the strategic scale of development. There are opportunities to reinforce links from the immediate area to the neighbourhoods of Three Bridges and Forge Wood, enhance sustainable linkages with the bus, pedestrian and cycle network, whilst offering scope to contribute to the encouragement of healthy lifestyles through the design process. These factors must be considered against the loss of open space, and the need for careful and appropriate master planning to mitigate any negative impacts for nearby residents. However, on a standalone basis the smaller scale of the site limits the opportunity to realise these benefits. Uncertain Impact (?)</p>
Conclusions	<p>The site has been promoted as either an extension to, or an alternative layout for, the proposed Gatwick Green allocation for strategic employment. Were the site to come forward as part of Gatwick Green as a comprehensively planned strategic employment site, it would broadly be comparable to that site in sustainability terms. However, Gatwick Green is capable of accommodating Crawley's outstanding</p>

SA Objective	Commentary and/or Impact
	employment needs in full, and there is not an employment land supply based justification for identifying further land beyond this. It is possible that inclusion of the Land at Fernhill as part of an alternative Gatwick Green land area could achieve sustainability benefits, but in the absence of the two site promoters working together it cannot be demonstrated with certainty that such a scheme would be suitable, available and achievable, bringing into question the overall deliverability of a Strategic Employment Location. On a standalone basis, Land at Fernlands would be an isolated site and it would not be able to meet Crawley's employment land requirements in full, nor would it be able to offer the wider sustainability benefits that a larger more comprehensive scheme could deliver.

Assessment of Rejected Employment Sites

Name: East of Brighton Road

Site Potential Allocation: Employment

Description: Countryside location falling within the Tilgate/Worth Forest Rural Fringe landscape character area. Greenfield land in the 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. 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. It is subject to several environmental designations, including ancient woodland and is identified as a Site of Nature Conservation Importance.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The area is heavily wooded, including large areas of ancient woodland, and is a Local Wildlife Site and a Biodiversity Opportunity Area. Main access to any development would need to be considered off the M23 or A23, which is likely to be given the storage & distribution-led nature of Crawley's employment needs. However, given the distance of the site from Crawley's neighbourhoods and local facilities by foot or cycle, and limited public transport, private car represents the most likely means of staff 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 existing Main Employment Sites of Manor Royal, the Town Centre and Gatwick Airport, and also the majority of public transport and other larger urban areas, is considered unsustainable for what would need to be a Strategic Employment site. 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. The site is situated in Flood Zone 1 (low probability) and only small areas are subject to risk of surface water flooding. The site falls largely outside of the Southern Water Sussex North Water Resource Zone, though there appears that some parts of the site would be subject to this constraint. Significant Negative Impact (--)
3. Protect and/or Enhance the Built Environment	The area forms an important element of the town's structural landscaping and provides an attractive setting for the southern neighbourhoods and visitors approaching the town from the south. Long distance views towards the area from various viewpoints within the built up area would be adversely affected by development. A scattering of residential properties are located close to the site adjacent to Tilgate Forest Business Park. The high value contribution this area of structural landscaping makes to the setting of Crawley's built environment is considered to outweigh the benefits that an employment generating development in this location would offer. In this regard, identification of East of Brighton Road for employment use is viewed as having a negative impact. Negative Impact (-)
4. Decent/ Affordable Homes	Land East of Brighton Road is not subject to unacceptable aviation noise impacts that would prevent it being considered for residential use, although its location close to main roads is likely to give rise to noise from surface transport sources. The site provides important

SA Objective	Commentary and/or Impact
	structural landscaping that frames the arrival into Crawley from the south, and the given significant environmental designations on site and its wider value as open space, it is not considered that the site would be appropriate for housing or employment use. No Impact (0)
5. Maintain/ Support Employment	The site is situated close to the existing Tilgate Forest Business Park. The presence of environmental designations including areas of ancient woodland, and its designation as a Site of Nature Conservation Importance, and structural landscaping means that strategic employment development in this location would be unacceptable. The significant presence of ancient woodland limits somewhat the scope to link into or extend Tilgate Forest Business Park. Given the significant site constraints, the benefits of any employment development would likely be reduced compared with the negative impacts of this area of open space being lost to development. Possible Positive or Slight 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 area of Structural Landscaping, and designated as a Local Wildlife Site and a Biodiversity Opportunity Area. Identification of the site as a Main Employment Area would 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 likely 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 whilst this may offer benefits for storage & distribution operations, given the limited public transport options it is likely that car access would be dominant for staff. with the proximity of the strategic road network likely encouraging in-commuting by car. 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 would be required to serve the site and at this time there is no evidence that this can/would be provided or sufficient, although the scale of the site is such that it could come forward. The site is not subject to Gatwick Airport safeguarding, though would not be appropriate for development given the significant amenity and environmental value of the site. Uncertain Impact (?)
9. Promote Sustainable Communities and Encourage Active Lifestyles	Identification of East of Brighton Road as a Main Employment Area would potentially enhance the 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 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	Given the substantial open space, structural landscaping, and environmental value of the site, the presence of significant environmental constraints, and its separation from Crawley's main employment areas, this site would not be appropriate for allocation as a new Main Employment Area. The economic benefits of new employment land and floorspace must be considered against the significant negative impacts its development would have on an important environmental asset.

Assessment of Rejected Employment Sites

Name: Tilgate Country Park

Site Potential Allocation: Employment

Description: Countryside location. Greenfield. South of the borough, adjacent to Tilgate, Furnace Green and Maidenbower neighbourhoods abutting the M23. Land in council ownership. Tilgate Park is 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, 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. It is subject to a number of environmental and historic designations.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	Tilgate Country Park is heavily wooded, with areas of ancient woodland. Development would lead to a significant loss of trees. Main access to any development would need to be considered off the M23 or A23 - these links would likely be beneficial given the storage & distribution-led nature of Crawley's employment need, but present wider sustainability concerns in terms of staff access. 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 the ability to minimise pollution and climate change. The loss of greenspace and woodland would also negatively impact achieving this objective. 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. A significant area around Tilgate Lake is located within Flood Zone 3b (functional floodplain) and small parts of the site are at risk of surface water flooding. The site falls significantly within the Southern Water Sussex North Water Resource Zone, meaning that the area is subject to water neutrality, and also offsetting opportunities. Significant Negative Impact (--)
3. Protect and/or Enhance the Built Environment	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 would be adversely affected by development. There are historic buildings within the area that are important in the designated historic parkland context and are protected. Overall, the high value contribution this area makes to the surrounding built environment outweighs the benefits of any employment generating development. Significant Negative Impact (--)
4. Decent/ Affordable Homes	Tilgate Park is not subject to unacceptable noise impacts that would prevent it being considered for residential use. However, the park provides a high quality open space, leisure and biodiversity role that is used and valued by the community, not just Crawley residents but also people from the wider area. It is not considered that the site would be appropriate for housing or employment use, and its loss would result in a significant under-supply of open space. No Impact (0)
5. Maintain/ Support Employment	The site is situated close to the existing Tilgate Forest Business Park. The presence of significant environmental designations including large areas of ancient woodland, Sites of Nature Conservation Importance and Historic Parks and Gardens mean that strategic employment development in this location would be unacceptable. The significant presence of ancient woodland limits any scope to link into or extend Tilgate Forest Business Park. Given the significant site constraints, the benefits of any employment development would likely be minimal, and significantly outweighed by the negative impacts of the site being lost to development. Possible Positive or Slight Positive Impact (+?)
6. Conserve/ Enhance Biodiversity and	Tilgate Country Park is situated outside the Built-Up Area Boundary, within an area of countryside and mature woodland, including large areas of ancient woodland. It is identified as an area of Structural Landscaping, and is designated as a Local Wildlife Site, Historic Park &

SA Objective	Commentary and/or Impact
Landscape	Garden, and a Biodiversity Opportunity Area. Identification of the site as a Main Employment Area would 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 would likely lead to car borne journeys, as the majority of the site is less 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, with 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	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, particularly given the fundamental site constraints. The site is not subject to Gatwick Airport safeguarding, though would not be appropriate for development given the significant amenity and environmental value of the site. Uncertain Impact (?)
9. Promote Sustainable Communities and Encourage Active Lifestyles	Identification of Tilgate Country Park as a Main Employment Area would potentially enhance the 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 impacting upon 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. 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 at Tilgate Lake, 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 significantly undermine access to open space and amenities, resulting in a significant negative impact against the objective to support sustainable communities and encourage active lifestyles. Significant Negative Impact (--)
Conclusions	Given the substantial open space and environmental value of the site, the presence of significant environmental and historic constraints, and its separation from Crawley's main employment areas, this site would not be appropriate for allocation as a new Main Employment Area. The economic benefits of any new employment land and floorspace must be considered against the significant negative impact that development would have on one of the most important environmental and recreational assets in the borough.

Option: Do Not Allocate New Employment Land

Site Potential Designation: This option would involve not allocating a new site(s) to accommodate Crawley’s outstanding industrial/storage & distribution-led employment needs. Rather than allocating a new Strategic Employment Location, the strategy would continue to rely on employment growth being located, so far as it can be accommodated, within Crawley’s existing main employment areas, whilst allowing scope for appropriate extensions to Manor Royal where this would land to the overall business land supply and is consistent with safeguarding and countryside policies.

Site Description: N/A

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Mitigate Climate Change & Local Pollution	This approach would essentially maintain the status quo, with planning applications for B8 storage & distribution and other employment uses directed to the existing main employment areas. Based on recent planning applications, Manor Royal represents the most likely destination, offering larger plots that to be redeveloped, and scope for some appropriately planned business land extensions into the countryside. In directing employment development to the established main employment areas, development would be well placed to benefit from the existing clustering of businesses, with opportunities to link into established sustainability measures such as established bus and active travel routes, and opportunities to link into District Energy Network Priority Areas. Such an approach may be less likely to involve a substantial loss of countryside land, although by not identifying a dedicated new Strategic Employment Location development pressure may increase at the interface between Manor Royal and the countryside. Positive Impact (+)
2. Adapt to Climate Change	In the absence of dedicated new employment land, development would continue to be directed to the established main employment areas, particularly Manor Royal. Given the sustainable location of most of Crawley’s main employment areas, there is scope for employees to maximise use of existing sustainable and active transport links, reducing the need to travel by private vehicle. New employment growth, specifically within the B8 storage & distribution sectors, will invariably result in greater vehicular movements, though by focussing on existing employment clusters, sufficient infrastructure is (or in principle can be put) in place. Most of Crawley’s main employment areas are situated within Flood Zone 1, with the exception of Three Bridges Corridor which is subject to areas of Flood Zones 2 and 3. More broadly, Manor Royal and Three Bridges Corridor are identified as District Energy Network Priority Areas. The bulk of Crawley’s main employment areas are situated within the Sussex North Water Resource Zone, meaning that development is subject to water neutrality, though also presenting offsetting opportunities. Positive Impact (+)
3. Protect and/or Enhance the Built Environment	Directing business development to the established main employment areas presents an opportunity to enhance the built environment in these locations through the redevelopment of older stock. Crawley’s need is significantly of a B8 storage & distribution nature, which can present some design challenges, though the Manor Royal Design Guide SPD provides the necessary guidance to ensure development in this location is of a high quality design standard. More broadly, directing employment development to the main employment areas helps ensure it is concentrated in dedicated locations, helping guide the relationship between business and residential uses. Positive or Slight Positive Impact (+?)
4. Decent/ Affordable Homes	The sites being considered for new employment land are not appropriate for residential development due to the impact of aircraft noise should a future southern runway progress at Gatwick Airport. In the absence of a Strategic Employment Location being allocated, employment needs would be directed, so far as they can be accommodated, to the existing main employment areas. Therefore, not allocating a new Strategic Employment Location would of itself have an impact on the objective for decent/affordable homes. No Impact (0)
5. Maintain/ Support Employment	As a result of Crawley’s constrained land supply position, the 2015 Local Plan was not able to accommodate employment needs in full, and that Plan set out the preference that Crawley’s unmet needs would be accommodated firstly within the north of the borough, before areas

SA Objective	Commentary and/or Impact
	<p>outside of the borough close to Gatwick are considered. Through that approach, the allocated Horley Strategic Business Park planned to meet a significant amount of Crawley's unmet office-led business needs at that time. Looking to the wider sub-region, the Coast to Capital LEP Strategic Economic Plan recognises that demand for new business land outstrips the available supply, supporting the delivery of new business space for the area. A number of new employment sites are planned within the Gatwick Diamond to meet a variety of needs, including the office-led Horley Strategic Business Park, Burgess Hill Science & Technology Park (research & innovation) and in Horsham District through North Horsham and at Novartis Site (smaller business spaces and start ups). These sites will all add to the overall economic strength of the Gatwick Diamond, but none would be meeting the storage & distribution needs of Crawley, with demand particularly focussed on the area given its proximity to Gatwick Airport and the strategic road network.</p> <p>In the absence of a Strategic Employment Location being allocated in Crawley, it is anticipated that unmet B8 needs would continue to be directed to Crawley's existing main employment areas, and Manor Royal in particular. This reflects the situation at the time of writing, with the strong market demand for B8 warehouses reflected in several planning applications/permissions at Manor Royal. These applications have typically focussed on the redevelopment of office sites and other uses including Sui Generis. Whilst redevelopment and churn of older sites is welcomed and an important aspect of Manor Royal's continued evolution, there is a risk that its overall mixed-use function may be undermined through a transition to a predominantly B8 focus. Given that warehouse use makes for a less intensive use of land in terms of employment density, there is also risk that loss of existing sites to B8 is very quickly using up the available Manor Royal land supply, with fewer sites available to meet the demand for warehousing. Identification of new strategic employment land in Crawley is viewed as an important aspect of Crawley's continued economic recovery and future resilience, as identified in the Economic Recovery Plan 2021. More broadly, the NPPF is clear that planning policies pro-actively encourage sustainable economic growth and should recognise and address the specific locational requirements of different sectors including storage and distribution.</p> <p>Overall, there is risk that a failure to identify new land for a strategic employment location will mean that Crawley's locationally specific B8 storage & distribution needs will either remain unmet, or that they will continue to be directed to Manor Royal, potentially undermining its function as a mixed-use business location. The approach of not identifying new employment land, and the implications of this for both Crawley and the wider Gatwick Diamond, is viewed as having a significant negative impact. Significant Negative Impact (--)</p>
6. Conserve/ Enhance Biodiversity and Landscape	<p>Given Crawley's severely constrained land supply position, identification of land for a Strategic Employment Location must by necessity focus on greenfield sites. If new employment land is not identified, employment development need will be directed, so far as it can be accommodated, to the main employment areas. The approach will also to some extent increase pressures for extensions of Manor Royal into the countryside to provide new business land where consistent with safeguarding and countryside policies. Possible Negative or Slight Negative Impact (-?)</p>
7. Promote Sustainable Journeys	<p>In the absence of a strategic employment location being allocated, economic development needs would be directed, so far as they are able to be accommodated, to the existing main employment area, and Manor Royal in particular. The main employment areas are well served by sustainable transport links and are generally accessible from residential neighbourhoods via active travel. The specific storage & distribution nature of Crawley's employment needs means that development would invariably result in an increased number of vehicular movements, with impacts needing to be mitigated through contributions as appropriate. Substantial improvements to sustainable transport will be more difficult to deliver than for a single strategic site. Possible Positive or Slight Positive Impact (+?)</p>
8. Provide Sufficient Infrastructure	<p>Not allocating a strategic employment location would mean that infrastructure requirements associated with the B8 storage & distribution needs could not be planned for on a strategic basis. Development would instead be directed to the existing main employment areas, making use of and where necessary enhancing (through developer contributions as appropriate) infrastructure provision. In directing employment to the main employment areas, development would broadly be steered away from the Gatwick Airport safeguarded land. The approach would</p>

SA Objective	Commentary and/or Impact
	however mean that the need for strategic level storage & distribution land would go unmet, disadvantaging economic growth in the wider sub-region. Possible Negative or Slight Negative Impact (-?)
9. Promote Sustainable Communities and encourage active lifestyles.	A strategic employment allocation would provide an opportunity to deliver appropriate supporting facilities as part of a planned development. In its absence, development would be directed to the existing main employment areas. These are broadly accessible from Crawley's neighbourhoods via sustainable transport, and to varying degrees incorporate supporting facilities and services to cater for the needs of employees. Manor Royal, the most likely destination for new employment floorspace, is relatively well served with access to open space, eating, leisure and recreation uses (though there are acknowledged shortfalls). No Impact (0)
Conclusions	The key implication of not allocating a strategic employment location is that Crawley's outstanding storage & distribution needs would not be met. Whilst strategic employment is planned elsewhere is the Gatwick Diamond, this is not focused on the storage & distribution sectors, potentially leaving a supply gap that would not otherwise be catered for. This is particularly the case given the strong market demand for B8 premises in Crawley. In the absence of a strategic employment location, it is likely that B8 demand will continue to be directed to Manor Royal, and though warehousing represents an important aspect of the Manor Royal function, it is possible that the overall mixed-use nature of the business district will be eroded if office, industrial and other employment land continues to be redeveloped for warehousing. Identification of new employment land for storage & distribution would provide market choice and economic resilience for Crawley and the wider Gatwick Diamond, supporting economic growth in line with national policy. As such, it is considered that there would be negative economic impacts were the Local Plan not to identify new employment land.