

Five Year Policy Assessment – Review of Policies in the Crawley Borough Local Plan 2015 – 2030

Policy and Summary of Purpose	Discussion of Local Circumstances, Evidence and Conformity with National Policy	Conclusions
<p>Policy SD1: Presumption in Favour of Sustainable Development: Overarching Strategic Policy – introduces the NPPF Presumption in Favour of Sustainable Development in the local context of Crawley.</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF, in particular reflecting the priorities set out in Section 2: Achieving Sustainable Development, Paragraphs 7 – 10 (highlighting the three dimensions/objectives of achieving sustainable development through the planning system – set out in paragraph 8 of the NPPF). The policies and assets applicable to a Crawley context are in conformity with the approach of Paragraph 11 and footnote 6.</p> <p><u>Local Circumstances and Evidence:</u></p>	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>
<p>Policy CH1: Neighbourhood Principle: Strategic Policy – sets the framework of local planning policy for Crawley within the Neighbourhood Principle of the New Town masterplan.</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF, in particular paragraphs 122d) and 127c).</p> <p><u>Local Circumstances and Evidence:</u></p> <ul style="list-style-type: none"> • Crawley Extensive Urban Survey (2008) • Crawley Baseline Character Assessment (2009) 	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>
<p>Policy CH2: Principles of Good Urban Design: Strategic Policy – sets the key principles for achieving successful places through urban design.</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF, in particular reflecting the priorities set out in Section 12: Achieving well-designed places, including footnote 47 which references Building for Life 12. The Policy is in conformity with recent government advice, published in the National Design Guide.</p> <p><u>Local Circumstances and Evidence:</u></p> <ul style="list-style-type: none"> • Successful in reasons for refusal in appeals. • Building for Life 12 (2012) 	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>

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	<ul style="list-style-type: none"> • Crawley Extensive Urban Survey (2008) • Crawley Baseline Character Assessment (2009) 	
<p>Policy CH3: Normal Requirements of All new Development: Strategic Development Management Policy – establishes the key requirements expected from all development.</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF, in particular reflecting the priorities set out in Section 12: Achieving well-designed places.</p> <p><u>Local Circumstances and Evidence:</u></p> <ul style="list-style-type: none"> • Successful in reasons for refusal in appeals. • Identified as Policy not fully implemented in AMR. • Design Guides/Codes etc. 	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>
<p>Policy CH4: Comprehensive Development and Efficient Use of Land: Policy requires efficient use of land.</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF. In particular, the increased emphasis through Section 11: Making Effective Use of Land.</p> <p><u>Local Circumstances and Evidence:</u></p> <ul style="list-style-type: none"> • Densities. 	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>
<p>Policy CH5: Standards for All New Dwellings (including conversions): Policy establishes the National Internal Space Standards into local policy.</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF. In particular reflecting the priorities set out in Section 12: Achieving well-designed places, particularly paragraph 127a) and f). The Policy reflects the government’s Technical Housing Standards Nationally Described Space Standards. The Policy reflects the national Building Regulations Part M(2) for accessible and adaptable dwellings.</p> <p><u>Local Circumstances and Evidence:</u></p> <ul style="list-style-type: none"> • Successful in reasons for refusal in appeals. • Identified as Policy not fully implemented in AMR. • SHMA 	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>

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<p>Policy CH6: Tree Planting and Replacement Standards: Policy requires a new tree for each new dwellings and sets the replacement tree requirements for loss of trees.</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF. In particular reflecting the priorities set out in Section 12: Achieving well-designed places, particularly paragraph 127a) to f). The Policy is in line with the emerging national guidance recently consulted upon through England’s Tree Strategy.</p> <p><u>Local Circumstances and Evidence:</u></p> <ul style="list-style-type: none"> • Successful in reasons for refusal in appeals. <p>Identified as Policy not fully implemented in AMR: Green Infrastructure SPD – now is.</p>	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>
<p>Policy CH7: Structural Landscaping: Policy protects and enhances key areas of soft landscaping critical to the New Town layout.</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF. In particular reflecting the priorities set out in Section 12: Achieving well-designed places, particularly paragraph 127a) to f).</p> <p><u>Local Circumstances and Evidence:</u></p> <ul style="list-style-type: none"> • Crawley Extensive Urban Survey (2008) • Crawley Baseline Character Assessment (2009) 	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>
<p>Policy CH8: Important Views: Policy protects and enhances important and valued views across and within the town.</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF. In particular reflecting the priorities set out in Section 12: Achieving well-designed places, particularly paragraph 127a) to f).</p> <p><u>Local Circumstances and Evidence:</u></p> <ul style="list-style-type: none"> • Crawley Extensive Urban Survey (2008) • Crawley Baseline Character Assessment (2009) 	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>
<p>Policy CH9: Development Outside the Built Up Area: Strategic Development Management Policy for proposals</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF. In particular reflecting the priorities set out in Section 12: Achieving well-</p>	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>

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outside of the Built-Up Area Boundary and sets the landscape character areas.	<p>designed places, particularly paragraphs 77-78; 79a) to e); 83-84; 127a) to f); and 170a) and b).</p> <p><u>Local Circumstances and Evidence:</u></p> <ul style="list-style-type: none"> • Built Up Area Boundary Review (2015) • Crawley Landscape Character Assessment (2012) • Green Infrastructure SPD (2016) 	
<p>Policy CH10: High Weald Area of Outstanding Natural Beauty: Policy for proposals within the High Weald Area of Outstanding Natural Beauty to the south of the borough.</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF, in particular Paragraph 11 and footnote 6 and reflecting the priorities set out in Section 15: Conserving and Enhancing the Natural Environment, Paragraphs 170 – 172.</p> <p><u>Local Circumstances and Evidence:</u></p> <ul style="list-style-type: none"> • Pease Pottage Permission. • High Weald AONB Management Plan Update. 	Policy is Up-to-Date, in conformity with national policy and successfully implemented.
<p>Policy CH11: Rights of Way and Access to the Countryside: Policy requires the protection of Public Rights of Way.</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF, in particular Paragraph 98.</p> <p><u>Local Circumstances and Evidence:</u></p>	Policy is Up-to-Date, in conformity with national policy and successfully implemented.
<p>Policy CH12: Heritage Assets: Policy requires the protection of Heritage Assets.</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF, in particular reflecting the priorities set out in Section 16: Conserving and Enhancing the Historic Environment.</p> <p><u>Local Circumstances and Evidence:</u></p> <ul style="list-style-type: none"> • ASEQs and Locally Listed Buildings Heritage Assessment (2010) • Historic Parks and Gardens Review (2013) • Heritage Assets Review (2020) 	Policy is Up-to-Date, in conformity with national policy and successfully implemented.

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<p>Policy CH13: Conservation Areas: Policy requires the protection of Conservation Areas.</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF, in particular reflecting the priorities set out in Section 16: Conserving and Enhancing the Historic Environment.</p> <p><u>Local Circumstances and Evidence:</u></p> <ul style="list-style-type: none"> • ASEQs and Locally Listed Buildings Heritage Assessment (2010) • Conservation Area Statements (various) • Urban Design SPD (2016) • Heritage Assets Review (2020) 	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>
<p>Policy CH14: Areas of Special Local Character: Policy requires the protection of Areas of Special Local Character</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF, in particular reflecting the priorities set out in Section 16: Conserving and Enhancing the Historic Environment.</p> <p><u>Local Circumstances and Evidence:</u></p> <ul style="list-style-type: none"> • ASEQs and Locally Listed Buildings Heritage Assessment (2010) • Urban Design SPD (2016) • Heritage Assets Review (2020) 	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>
<p>Policy CH15: Listed Buildings and Structures: Policy requires the protection of Listed Buildings and Structures</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF, in particular reflecting the priorities set out in Section 16: Conserving and Enhancing the Historic Environment.</p> <p><u>Local Circumstances and Evidence:</u></p> <ul style="list-style-type: none"> • ASEQs and Locally Listed Buildings Heritage Assessment (2010) • Heritage Assets Review (2020) 	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>

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<p>Policy CH16: Locally Listed Buildings: Policy requires the protection of Locally Listed Buildings</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF, in particular reflecting the priorities set out in Section 16: Conserving and Enhancing the Historic Environment.</p> <p><u>Local Circumstances and Evidence:</u></p> <ul style="list-style-type: none"> • ASEQs and Locally Listed Buildings Heritage Assessment (2010) • Heritage Assets Review (2020) 	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>
<p>Policy CH17: Historic Parks and Gardens: Policy requires the protection of locally designated Historic Parks and Gardens</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF, in particular reflecting the priorities set out in Section 16: Conserving and Enhancing the Historic Environment.</p> <p><u>Local Circumstances and Evidence:</u></p> <ul style="list-style-type: none"> • Heritage Assets Review (2020) 	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>
<p>Policy EC1: Sustainable Economic Growth: Strategic Policy protects the Main Employment Areas for sustainable economic growth – identifying provision of 23ha of employment land to meet the needs of the borough over the first five years of the Plan period. It establishes the need to meet a further 35ha of land for business uses over the remainder of the Plan which it sets a sequential approach for: i. Land within Crawley, in the north of the borough;</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF, in particular reflecting the priorities set out in Section 6: Building a Strong, Competitive Economy, as well as paragraphs 8, 16, 20, 22, 23 and 24 – 27.</p> <p><u>Local Circumstances and Evidence:</u> The allocated Horley Strategic Business Park will help to accommodate some of Crawley’s office needs from the 2015 Local Plan. Based on the updated EGA (2020), Crawley’s identified need for the forthcoming Plan period is significantly within the B8 storage & distribution sector. The Employment Land Trajectory provides further detail on the available business land supply pipeline.</p>	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>

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ii. Land at Crawley/Gatwick, in the areas immediately adjoining the borough; iii. Land near Crawley/Gatwick		
Policy EC2: Economic Growth in Main Employment Areas: Policy protects existing employment land within the Main Employment Areas.	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF, in particular reflecting the priorities set out in Section 6: Building a Strong, Competitive Economy, as well as paragraphs 8, 16, 20, 22, and 23.</p> <p><u>Local Circumstances and Evidence:</u> The policy approach is flexible to support economic growth within the designated main employment areas, and resists the loss of employment floorspace unless specific criteria are met. Floorspace lost through prior approval has been a factor, and Article 4 Directions have been made to address this issue. A recent appeal decision has reinforced the Local Plan approach that the main employment areas should be protected for employment uses and are not appropriate locations for residential.</p>	Policy is Up-to-Date, in conformity with national policy and successfully implemented.
Policy EC3: Manor Royal: Policy protects Manor Royal for Business Uses.	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF, in particular reflecting the priorities set out in Section 6: Building a Strong, Competitive Economy, as well as paragraphs 8, 16, 20, 22, and 23.</p> <p><u>Local Circumstances and Evidence:</u> Article 4 Directions are in force to prevent the loss of business floorspace to residential use, these having been made to protect the existing business land supply, ensure the function of Manor Royal is not undermined by non-conforming uses, and to prevent inappropriate residential use in this location.</p>	Policy is Up-to-Date, in conformity with national policy and successfully implemented.

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<p>Policy EC4: Employment Development and Residential Amenity: Policy protects amenity of residential areas from employment development and vice versa.</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF, in particular reflecting the priorities set out in Section 6: Building a Strong, Competitive Economy, as well as paragraphs 182 – 183.</p> <p><u>Local Circumstances and Evidence:</u> A recent appeal decision has reinforced the Local Plan approach that the main employment areas should be protected for employment uses and are not appropriate locations for residential.</p>	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>
<p>Policy EC5: Primary Shopping Area: Policy establishes primary (Use Class A1, A2 and A3) and secondary (Use Class A1, A2, A3, A4 and A5) shopping frontages. It supports appropriate main town centre uses within the primary shopping area, and supports the reuse of upper floors for retail and residential.</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF, in particular reflecting the priorities set out in Section 7: Ensuring the Vitality of Town Centres, as well as paragraphs 8, 16 and 20.</p> <p>Use Class Changes: Policy is supportive of main town centre uses in the primary retail frontages, with A4 and A5 (now sui generis) uses permitted in the secondary shopping frontages. The policy remains NPPF compliant as the updated use classes correspond with the existing policy approach.</p> <p><u>Local Circumstances and Evidence:</u> Crawley Retail, Commercial Leisure and Town Centre Needs Assessment (2020).</p>	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>
<p>Policy EC6: Development Sites within the Town Centre Boundary: Policy allocates sites within the town centre boundary for mixed town centre uses schemes.</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF, in particular reflecting the priorities set out in Section 6: Building a Strong, Competitive Economy and Section 7: Ensuring the Vitality of Town Centres, as well as paragraphs 8, 16, 20, 22, and 73.</p> <p><u>Local Circumstances and Evidence:</u> Progress on the allocated sites:</p> <ul style="list-style-type: none"> • Parkside Car Park 	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>

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	<ul style="list-style-type: none"> • Traders Market, High Street – Complete (6 ground floor retail units and 5 residential units above) • Central Sussex College (East of Tower) – Under Construction (98 affordable residential units) • Brittingham House, Orchard Street • County Buildings – options being explored for redevelopment. • Telford Place – pre-application discussions ongoing. • Crawley Station and Car Parks – Outline Planning Permission secured and reserved matters/detailed application submitted. • Land North of The Boulevard – Part Complete, Part Under Construction, Part Outline Planning Permission (185 residential units converted through Permitted Development Rights; 91 affordable residential units under construction; new Town Hall office building under construction; Outline Planning Permission secured for 182 residential units; Commencement of Energy Centre). 	
<p>Policy EC7: Retail and Leisure Development outside the Primary Shopping Area: Policy establishes the town centre first sequential approach to retail and leisure proposals in Crawley.</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF, in particular reflecting the priorities set out in Section 7: Ensuring the Vitality of Town Centres, particularly paragraphs 86-90.</p> <p><u>Local Circumstances and Evidence:</u> Crawley Retail, Commercial Leisure and Town Centre Needs Assessment (2020).</p>	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>
<p>Policy EC8: Neighbourhood Centres: Policy supports uses complementary to the vitality and viability of the neighbourhood centres.</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF, in particular reflecting the priorities set out in Section 7: Ensuring the Vitality of Town Centres.</p> <p>The recent Use Classes changes correspond with the approach of the policy, which seeks to support the day-to-day needs of</p>	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>

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	<p>residents through retaining the function of the neighbourhood parades.</p> <p><u>Local Circumstances and Evidence:</u> Crawley Retail, Commercial Leisure and Town Centre Needs Assessment (2020).</p>	
<p>Policy EC9: Rural Economy: Policy supports appropriate uses outside the Built-Up Area Boundary.</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF, in particular reflecting the priorities set out in Section 6: Building a Strong, Competitive Economy, paragraphs 83-84.</p> <p><u>Local Circumstances and Evidence:</u></p>	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>
<p>Policy H1: Housing Provision: Strategic Policy establishes a supply-led housing requirement for the borough of a minimum of 5,100 new dwellings over the Plan period. Policy commits the council to working with neighbouring authorities in order to meet the remaining unmet need of 5,000 dwellings arising from the borough's full objectively assessed housing need (675 dwellings per annum = 10,125 new dwellings over the Plan period).</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF, in particular reflecting the priorities set out in Section 5: Delivering a Sufficient Supply of Homes, as well as paragraphs 8, 16, 20, 22, 23 and 24 – 27.</p> <p>Since the calculation of the Objectively Assessed Housing Need for Crawley, the government has introduced the Standard Method for calculating housing need. This is based on the same principle of household projections as Crawley's Objectively Assessed Housing Need was (although the 2014-base projections rather than the 2012-based projections used in the evidence for the adopted Local Plan). Whilst the Local Plan Objectively Assessed Housing Need considered uplifts relating to previous under-provision, supporting economic growth, affordability and market signals, the Standard Method involves uplift relating to affordability.</p> <p><u>Local Circumstances and Evidence:</u></p>	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>

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	<p>Since the adoption of the Local Plan, Crawley Borough Council has worked closely with its neighbouring authorities, Horsham and Mid Sussex District Councils, in order to address the unmet needs arising from the borough. Through the adoption of the three Local Plans for the Northern West Sussex Housing Market Area, the full identified Objectively Assessed Housing Need is being met.</p> <p>The Standard Method calculation results in a housing need for Crawley of 750 dwellings per annum (dpa). This is slightly higher than the adopted Plan's estimation of 675dpa. Therefore, the Local Plan Inspector was considering a figure in a similar context as is currently the case, including taking local affordability and market signals into account.</p> <p>In addition, it must be noted that the NPPF continues to acknowledge that not all locations will be able to meet their full objectively assessed needs for housing and other uses (paragraph 11b). The Local Plan Inspector considered the constraints of the borough which remain unchanged (paragraphs 10, 16, 19, 31 – 34 of the Inspector's Report on the Examination into Crawley Borough Local Plan 2015-2030, November 2015).</p> <p>The current Housing Trajectory, published in the council's Authority's Monitoring Report 2018/19 (AMR), indicates the borough is on track to meet the anticipated levels of delivery and is currently exceeding the Crawley Borough Local Plan annualised average housing delivery figure of 340 dwellings per annum (Table 3.1 in the AMR). Two sets of national results of the Housing Delivery Test, for the years 2018 and 2019 respectively, have now been published⁴. In these years the level of housing delivery, as</p>	

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	<p>measured against housing need, in Crawley, amounted to 181% and 235% respectively.</p> <p>Due to the frontloaded nature of the borough's housing trajectory, Crawley currently has a land supply of deliverable housing sites over the period 2019 – 2024, equalling 11.3 years (AMR 2018/19).</p>	
<p>Policy H2: Key Housing Sites: Policy allocates sites for the development of housing. Policy specifies those sites where there are other constraints and/or specific policy considerations.</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF, in particular reflecting the priorities set out in Section 5: Delivering a Sufficient Supply of Homes, as well as paragraphs 8, 16, 20, 22, and 23.</p> <p><u>Local Circumstances and Evidence:</u> Progress on allocated sites:</p> <ul style="list-style-type: none"> • Forge Wood (1,900 dwellings) – final phase detailed planning application submitted; 817 dwellings completed. • Ifield Community College (125 dwellings) – completed (193 dwellings) • Southern Counties (218 dwellings) – completed • Land adjacent to Desmond Anderson (100 dwellings) • Fairfield House (93 dwellings) – completed (92 dwellings) • 15 – 29 Broadway Upper Floors (57 dwellings) – completed (78 dwellings) • Kilnmead Car Park (40 dwellings) – completed (37 dwellings) • Zurich House (59 dwellings) • Goffs Park Depot (30 dwellings) – completed (44 dwellings) • Former TSB site, Russell Way (40 dwellings) • Land Adjacent to Langley Green Primary School (30 dwellings) – completed • 5 – 7 Brighton Road (48 dwellings) – completed 	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>

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	<ul style="list-style-type: none"> • Longley Building (48 dwellings) – Planning Application submitted (121 affordable residential dwellings) • Telford Place – pre-application discussions ongoing. • Crawley Station and Car Parks – Outline Planning Permission secured and reserved matters/detailed application submitted. • County Buildings – options being explored for redevelopment. • Land North of The Boulevard – Part Complete, Part Under Construction, Part Outline Planning Permission (185 residential units converted through Permitted Development Rights; 91 affordable residential units under construction; new Town Hall office building under construction; Outline Planning Permission secured for 182 residential units; Commencement of Energy Centre). • Tinsley Lane (Housing and Open Space Site: 120 dwellings) – Development Brief Adopted. • Breezehurst Drive Playing Fields (Housing and Open Space Site: 65 dwellings) – Development Brief Adopted; Planning Application Submitted 85 affordable residential dwellings. • Henty Close (Housing and Open Space Site: 24 dwellings) • Land East Balcombe Road/Street Hill (Housing, Biodiversity and Heritage Site: 15 dwellings) – Draft Development Brief prepared and consulted. • Oakhurst Grange (Housing for Older People: 55 dwellings or up to 120 Residential Rooms as Class C2) • Town Centre Broad Locations (156 dwellings) • Residual Land at Forge Wood (150 dwellings) – Outline Permission Secured for Land at Steers Lane. • Land East of London Road (171 dwellings) 	

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<p>Policy H3: Future Housing Mix: Policy requires housing developments to provide a mix of dwelling types and sizes using the Strategic Housing Market Assessment, and its updates, as a starting point.</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF, in particular reflecting the priorities set out in Section 5: Delivering a Sufficient Supply of Homes, in particular paragraphs 8b), 20a), 60 and 61.</p> <p><u>Local Circumstances and Evidence:</u> SHMA</p>	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>
<p>Policy H4: Affordable and Low Cost Housing: Policy requires 40% affordable housing from all residential development, at a tenure split of 70% affordable rent and 30% intermediate tenure. An additional 10% low cost housing is required from developments of 15 dwellings or more. The requirement is subject to viability, in such cases the council operates a cascading priority approach to adjusting the policy requirements. Financial contribution in lieu of on-site provision for sites of 5 dwellings or less.</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF, in particular reflecting the priorities set out in Section 5: Delivering a Sufficient Supply of Homes, in particular paragraphs 8b), 20a), 60 – 62 and 64. Paragraph 63 introduces a threshold whereby affordable housing should not be sought for residential developments that are not major developments. Furthermore, vacant buildings being reused or redeveloped, and affordable housing should be reduced by a proportionate amount. Paragraph 64 introduces an expectation that at least 10% of the homes available for any major development involving housing should be provided in the form of affordable home ownership.</p> <p><u>Local Circumstances and Evidence:</u> Crawley has a high affordable housing need and securing its provision in a land constrained borough is a critical concern. Even with seeking 40% affordable housing on all new housing development within the borough, this only meets 18% of the overall affordable housing needs required within the borough over the coming Plan period, identified through the Strategic Housing Market Assessment (SHMA) (2019). The SHMA indicated there is an overall affordable housing need of 739dpa (against the overall Standard Method of 750dpa); this is split into a need for 563dpa</p>	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>

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	<p>affordable rental properties (75%) and 176dpa affordable home ownership (25%).</p> <p>Annual monitoring¹ shows that the borough is meeting its 40% affordable housing target from housing developments which require planning permission, but not when residential developments secured through permitted development are taken into account. Furthermore, the council-led 100% affordable housing schemes are off-setting under provision from private market schemes due to viability constraints (Crawley Borough Council own-build schemes contributed 40 units (39 net) to these totals, comprising 15 dwellings in 2016/17 and 25 in 2018/19).</p> <table border="1" data-bbox="703 715 1565 1062"> <thead> <tr> <th>Year</th> <th>Gross delivery</th> <th>Net delivery</th> <th>As % of total net completions</th> <th>As % of net completions with planning permission</th> </tr> </thead> <tbody> <tr> <td>2015/16</td> <td>113</td> <td>113</td> <td>21%</td> <td>42%</td> </tr> <tr> <td>2016/17</td> <td>145</td> <td>144</td> <td>24%</td> <td>47%</td> </tr> <tr> <td>2017/18</td> <td>146</td> <td>146</td> <td>40%</td> <td>44%</td> </tr> <tr> <td>2018/19</td> <td>166</td> <td>166</td> <td>32%</td> <td>33%</td> </tr> <tr> <td>2015-19 Total</td> <td>570</td> <td>569</td> <td>28%</td> <td>41%</td> </tr> </tbody> </table> <p>The 10% Low Cost element of the Policy, along with the Intermediate Tenure within the definition of Affordable Housing are considered to be reflective of the government's intentions to increase affordable homeownership.</p>	Year	Gross delivery	Net delivery	As % of total net completions	As % of net completions with planning permission	2015/16	113	113	21%	42%	2016/17	145	144	24%	47%	2017/18	146	146	40%	44%	2018/19	166	166	32%	33%	2015-19 Total	570	569	28%	41%	
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¹ Crawley Authority's Monitoring Report 2018/19: https://crawley.gov.uk/sites/default/files/2020-10/Crawley%20Borough%20Local%20Plan%20Authority%20Monitoring%20Report%202018_19.pdf

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	<p>Since the adoption of the Crawley Local Plan, the council has published the Affordable Housing Supplementary Planning Document (SPD) which explains the council's approach towards any disproportionate burdens on small and medium developers and opportunities to support these coming forward within the borough. Appendix J of the SPD sets out the evidence and local context relating to Crawley's approach towards smaller housing developments and affordable housing.</p> <p>Successive Inspectors' Appeal Reports have confirmed that notwithstanding the substantial weight of the NPPF policy, Crawley has a demonstrable affordable housing need and a reliance on smaller sites due to the constrained land supply.</p> <p>The adopted Policy allows for flexibility to take into account viability as an exception.</p>	
<p>Policy H5: Gypsy, Traveller and Travelling Showpeople Sites: Policy allocates a reserve permanent Gypsy and Traveller site for up to ten pitches. Policy sets criteria for assessing other proposals.</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the National Planning Policy for Traveller Sites (2015)</p> <p><u>Local Circumstances and Evidence:</u> The council's updated Gypsy, Traveller and Travelling Showpeople's Accommodation Needs Assessment concludes that there remains no immediate need for new Traveller site provision within the borough, but a potential need may arise from new households emerging from the existing population within bricks and mortar accommodation wishing to take up a travelling lifestyle over the Plan period.</p>	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>
<p>Policy H6: Houses in Multiple Occupation:</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF, in particular reflecting the priorities set out in Section 5: Delivering a Sufficient</p>	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>

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<p>Policy sets criteria for considering proposals for development of and changes of use to Houses of Multiple Occupation.</p>	<p>Supply of Homes, in particular paragraph 61 as well as Section 11: Making Effective Use of Land and Section 12: Achieving Well-Designed Places.</p> <p><u>Local Circumstances and Evidence:</u></p>	
<p>Policy ENV1: Green Infrastructure: Strategic Policy conserves and enhances the borough's multifunctional green infrastructure network.</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF. In particular reflecting the priorities set out in Section 12: Achieving well-designed places, particularly paragraph 127a) to f); Section 8: Promoting Healthy and Safe Communities; Section 15: Conserving and Enhancing the Natural Environment. The Policy is in line with the emerging national guidance recently consulted upon through England's Tree Strategy and achieving Net Gain in Biodiversity through the 25 Year Environment Plan (2018).</p> <p><u>Local Circumstances and Evidence:</u> Since the adoption of the Local Plan, the council has published the Green Infrastructure Supplementary Planning Document (SPD) to support the implementation of this Policy. Further evidence has been secured through the Eco-Serv Report.</p>	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>
<p>Policy ENV2: Biodiversity: Policy seeks to secure biodiversity features in all new development proposals. Policy protects habitats and species to ensure a net gain in biodiversity.</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF. In particular reflecting the priorities set out in Section 12: Achieving well-designed places, particularly paragraph 127a) to f); Section 8: Promoting Healthy and Safe Communities; Section 15: Conserving and Enhancing the Natural Environment. The Policy is in line with the emerging national guidance recently consulted upon through England's Tree Strategy and achieving</p>	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>

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	<p>Net Gain in Biodiversity through the 25 Year Environment Plan (2018).</p> <p><u>Local Circumstances and Evidence:</u> Since the adoption of the Local Plan, the council has published the Green Infrastructure Supplementary Planning Document (SPD) to support the implementation of this Policy. Further evidence has been secured through the Eco-Serv Report.</p>	
<p>Policy ENV3: Local Green Space: Policy designates a site as a Local Green Space for its recreation, tranquillity, wildlife, heritage and accessible countryside values.</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF. In particular reflecting the priorities set out in Section 8: Promoting Healthy and Safe Communities, paragraphs 99 – 101; as well as Section 12: Achieving Well-Designed Places; Section 15: Conserving and Enhancing the Natural Environment and Section 16: Conserving and Enhancing the Historic Environment.</p> <p><u>Local Circumstances and Evidence:</u></p>	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>
<p>Policy ENV4: Open Space, Sport and Recreation: Policy protects existing open space, sport and recreation space from loss, unless criteria is met.</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF. In particular reflecting the priorities set out in Section 8: Promoting Healthy and Safe Communities, in particular paragraphs 96 – 97.</p> <p><u>Local Circumstances and Evidence:</u></p>	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>
<p>Policy ENV5: Provision of Open Space and Recreational Facilities: Policy ensures impact of increased population from new residential development is mitigated through</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF. In particular reflecting the priorities set out in Section 8: Promoting Healthy and Safe Communities, in particular paragraphs 96 – 97.</p> <p><u>Local Circumstances and Evidence:</u></p>	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>

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<p>contributions towards improvements to existing open space and/or provision of new open space as part of the development.</p>		
<p>Policy ENV6: Sustainable Design and Construction: Strategic Policy establishes the sustainability hierarchy and requires new residential dwellings to meet the strengthened on-site energy performance stances of Building Regulations and any subsequent increased requirements, and all new non-domestic buildings should achieve BREEAM Excellent for water and energy credits.</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF, in particular reflecting the priorities set out in Section 2: Achieving Sustainable Development, Paragraphs 7 – 10, in particular 8c; and Section 14: Meeting the Challenge of Climate Change, Flooding and Coastal Change, Paragraphs 148 – 154; as well as paragraph 20d) and paragraph 127a).</p> <p><u>Local Circumstances and Evidence:</u> Full Council Unanimous Climate Emergency Declaration Corporate Climate Change Strategy Planning and Climate Change Report Decentralised Energy Study</p>	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>
<p>Policy ENV7: District Energy Networks: Policy identifies the Priority Areas for District Energy Networks within the borough. Policy requires any major developments in the borough and all development proposals within the priority areas (over 100sqm floorspace) to demonstrate how they meet the policy expectations.</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF, in particular reflecting the priorities set out in Section 2: Achieving Sustainable Development, Paragraphs 7 – 10, in particular 8c; and Section 14: Meeting the Challenge of Climate Change, Flooding and Coastal Change, Paragraphs 148 – 154; as well as paragraph 20d) and paragraph 127a).</p> <p><u>Local Circumstances and Evidence:</u> Corporate Climate Change Strategy Planning and Climate Change Report Decentralised Energy Study</p>	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>

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<p>Policy ENV8: Development and Flood Risk: Policy protects new development from areas exposed to unacceptable risk from flooding, and prevents new development from increasing the risk of flooding elsewhere. Policy requires the use of SuDS to reduce peak surface water run-off rates and annual volumes of run-off.</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF, in particular reflecting the priorities set out in Section 2: Achieving Sustainable Development, Paragraphs 7 – 10, in particular 8c; and Section 14: Meeting the Challenge of Climate Change, Flooding and Coastal Change, Paragraphs 155 – 165; as well as paragraph 20d) and paragraph 127a).</p> <p><u>Local Circumstances and Evidence:</u> Updated Strategic Flood Risk Assessment</p>	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>
<p>Policy ENV9: Tackling Water Stress: Policy requires new residential dwellings to meet the Building Regulations optional requirement for tighter water efficiency. Non-residential development should meet BREEAM Excellent including addressing maximum water efficiencies under the mandatory water credits.</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF, in particular reflecting the priorities set out in Section 2: Achieving Sustainable Development, Paragraphs 7 – 10, in particular 8c; and Section 14: Meeting the Challenge of Climate Change, Flooding and Coastal Change, Paragraphs 148 – 149; as well as paragraph 20d) and paragraph 127a).</p> <p>The Policy reflects the government’s Optional Water Efficiency Standards set out in Building Regulations.</p> <p><u>Local Circumstances and Evidence:</u> Updated Water Cycle Study confirms that Crawley remains subject to serious water stress and that a dedicated policy to help offset the impact of development remains justified and appropriate.</p>	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>
<p>Policy ENV10: Pollution Management and Land Contamination:</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF, in particular reflecting the priorities set out in Section 15: Conserving and</p>	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>

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Policy prevents unacceptable risks from environmental pollution and land contamination.	<p>Enhancing the Natural Environment, particularly paragraphs 178 – 179 and 183.</p> <p><u>Local Circumstances and Evidence:</u></p>	
<p>Policy ENV11: Development and Noise: Policy protects people from unacceptable noise impacts, read in conjunction with the Local Plan Noise Annex. Policy sets the levels for unacceptable adverse effects on noise sensitive development: for transport sources the Unacceptable Adverse Effect is considered to occur where noise exposure is above 66dB LAeq, 16hr (57dB LAeq, 8hr at night)</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF, in particular reflecting the priorities set out in Section 15: Conserving and Enhancing the Natural Environment, particularly paragraphs 180, 182 and 183.</p> <p><u>Local Circumstances and Evidence:</u> Local Plan Review – draft Updated evidence in Noise Annex</p>	Policy is Up-to-Date, in conformity with national policy and successfully implemented.
<p>Policy ENV12: Air Quality: Policy protects against material negative impacts on air quality.</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF, in particular reflecting the priorities set out in Section 15: Conserving and Enhancing the Natural Environment, particularly paragraphs 181 – 183.</p> <p><u>Local Circumstances and Evidence:</u> Crawley has one designated AQMA, and this may be extended in area.</p>	Policy is Up-to-Date, in conformity with national policy and successfully implemented.
<p>Policy IN1: Infrastructure Provision:</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF, in particular reflecting the priorities set out in Section 2: Achieving Sustainable</p>	Policy is Up-to-Date, in conformity with national policy and successfully implemented.

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<p>Strategic Policy requires new development to be supported by necessary infrastructure. Policy protects existing infrastructure unless equivalent replacement is provided or there is sufficient alternative provision in the area.</p> <p>Policy confirms the council will seek to implement Community Infrastructure Levy.</p> <p>Section 106 agreements to address site specific issues.</p>	<p>Development, Paragraphs 7 – 10, in particular 8a and 8b; Section 8: Promoting Healthy and Safe Communities; and Section 9: Promoting Sustainable Transport; as well as paragraph 20b) and c); and paragraph 22.</p> <p><u>Local Circumstances and Evidence:</u> CIL adoption – August 2016 (use up-to-date CIL data)</p>	
<p>Policy IN2: Strategic Delivery of Telecommunications Infrastructure:</p> <p>Policy requires all residential, employment and commercial development to be designed to be connected to high quality communications infrastructure, to ensure fibre optic or other cabling does not need to be retrofitted.</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF, in particular reflecting the priorities set out in Section 10: Supporting High Quality Communications.</p> <p><u>Local Circumstances and Evidence:</u> Policy approach is supported by WSCC and reflects wider Coast to Capital LEP and Gatwick Diamond objectives to support high quality communications infrastructure.</p>	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>
<p>Policy IN3: Development and Requirements for Sustainable Transport:</p> <p>Policy concentrates development in locations where sustainable travel patterns can be achieved.</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF, in particular reflecting the priorities set out in Section 2: Achieving Sustainable Development, Paragraphs 7 – 10, in particular 8a and 8b; and Section 9: Promoting Sustainable Transport; as well as paragraph 20b) and c); and paragraph 22.</p> <p><u>Local Circumstances and Evidence:</u></p>	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>

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<p>Policy requires developments to meet the access needs they generate and not cause unacceptable impact in term of traffic congestion or highway safety (including cumulative impact). Policy requires the submission of Transport Statements or Transport Assessments for particular developments.</p>	<p>Crawley Transport Strategy: New Directions (2020)</p>	
<p>Policy IN4: Car and Cycle Parking Standards: Policy requires developments to meet the borough's car and cycle parking standards.</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF, in particular reflecting the priorities set out in Section 9: Promoting Sustainable Transport, particularly paragraphs 105 – 106.</p> <p><u>Local Circumstances and Evidence:</u> WSCC Parking Standards</p>	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>
<p>Policy IN5: The Location and Provision of New Infrastructure: Policy support the provision of new or improved infrastructure. Major facilities should be located in the most sustainable locations and local community facilities should be located close to neighbourhood centres.</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF, in particular reflecting the priorities set out in Section 2: Achieving Sustainable Development, Paragraphs 7 – 10, in particular 8a and 8b; Section 8: Promoting Healthy and Safe Communities; as well as paragraph 20b) and c); and paragraph 22.</p> <p><u>Local Circumstances and Evidence:</u></p>	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>
<p>Policy IN6: Improving Rail Stations: Policy requires consideration of enhancements for the specific roles of individual stations where</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF, in particular reflecting the priorities set out in Section 2: Achieving Sustainable Development, Paragraphs 7 – 10, in particular 8a and 8b; and</p>	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>

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developments are located at or within the vicinity of one of these.	<p>Section 9: Promoting Sustainable Transport; as well as paragraph 20b) and c); and paragraph 22.</p> <p><u>Local Circumstances and Evidence:</u></p>	
<p>Policy IN7: Crossovers: Policy sets the criteria for proposals for crossovers to access hardstandings in front gardens.</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF, in particular reflecting the priorities set out in Section 12: Achieving Well-Designed Places.</p> <p><u>Local Circumstances and Evidence:</u></p>	Policy is Up-to-Date, in conformity with national policy and successfully implemented.
<p>Policy GAT1: Development of the Airport with a Single Runway: Policy supports the growth of Gatwick Airport as a single runway, two terminal airport up to 45 million passengers per annum.</p>	<p><u>Conformity with National Policy:</u> The government established its policy and proposals in response to the findings of the Airports Commission when it published the Airports National Policy Statement in June 2018. This 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, a Court of Appeal decision in February 2020 has declared the ANPS to be unlawful. There has not, therefore, been a national policy decision with regard to future runway capacity in the south east, nor is there a new Aviation Strategy and therefore the requirements of the Aviation Policy Framework 2013 still apply. Therefore, national aviation policy remains the same as that against which the adopted Local Plan was considered.</p> <p><u>Local Circumstances and Evidence:</u> Prior to the Covid-19 pandemic, Gatwick Airport throughput had reached 46.4mppa (2018/19), primarily through operational</p>	Policy is Up-to-Date, in conformity with national policy and successfully implemented.

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	efficiency improvements and larger planes expanding capacity, therefore outside the planning process.	
<p>Policy GAT2: Safeguarded Land: Policy safeguards land to south and east of Gatwick Airport from development which would be incompatible with the expansion of the airport to accommodate the construction of an additional wide spaced runway (if required by national policy).</p>	<p><u>Conformity with National Policy:</u> The government established its policy and proposals in response to the findings of the Airports Commission when it published the Airports National Policy Statement in June 2018. This 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, a Court of Appeal decision in February 2020 has declared the ANPS to be unlawful. There has not, therefore, been a national policy decision with regard to future runway capacity in the south east, nor is there a new Aviation Strategy and therefore the requirements of the Aviation Policy Framework 2013 still apply. Therefore, national aviation policy remains the same as that against which the adopted Local Plan was considered, with the Aviation Policy Framework 2013 stating that land outside existing airports which may be required for airport development in the future needs to be protected against development which would be incompatible with the potential development of future runways.</p> <p><u>Local Circumstances and Evidence:</u> Gatwick Airport Master Plan 2019 argues that, whilst the airport is not actively pursuing an additional runway, it is in the national interest to continue with the strategy of land safeguarding.</p>	Policy is Up-to-Date, in conformity with national policy and successfully implemented.
<p>Policy GAT3: Gatwick Airport Related Parking:</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF, in particular reflecting the priorities set out in Section 2: Achieving Sustainable Development, Paragraphs 7 – 10; and Section 9: Promoting</p>	Policy is Up-to-Date, in conformity with national policy and successfully implemented.

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<p>Policy restricts airport related parking to within the airport boundary.</p> <p>Policy restricts new parking within the airport boundary to where it is justified by a demonstrable need in the context of achieving a sustainable approach to surface access to the airport.</p>	<p>Sustainable Transport; as well as paragraph 20b) and c); and paragraph 22.</p> <p><u>Local Circumstances and Evidence:</u> 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.</p>	
<p>Policy GAT4: Employment Uses at Gatwick:</p> <p>Policy protects the loss of airport-related office floorspace within the airport where it would not have a detrimental effect on the long-term ability of the airport to meet the operational needs as it expands.</p> <p>Policy prevents new office floorspace within the airport where it would have an unacceptable impact on Crawley Town Centre or Manor Royal.</p>	<p><u>Conformity with National Policy:</u> The Policy remains in conformity with the NPPF, in particular reflecting the priorities set out in Section 2: Achieving Sustainable Development, Paragraphs 7 – 10; and Section 6: Building a Strong, Competitive Economy.</p> <p><u>Local Circumstances and Evidence:</u> The policy approach has been applied in the determination of several planning applications, and has more recently been supported by GAL in its submission on the Regulation 19 Local Plan.</p>	<p>Policy is Up-to-Date, in conformity with national policy and successfully implemented.</p>