

**CRAWLEY BOROUGH COUNCIL
LOCAL PLAN REVIEW**

**SUSTAINABILITY APPRAISAL /
STRATEGIC ENVIRONMENTAL ASSESSMENT**

**DRAFT REPORT
For the Submission Local Plan**

January 2021



TABLE OF CONTENTS		Page
NON-TECHNICAL SUMMARY		3
1.0 INTRODUCTION		10
Sustainability Appraisal and Strategic Environmental Assessment		10
Structure of the Scoping Report		10
Consultation Arrangements		10
2.0 CONTEXT AND METHODOLOGY		12
Introduction to Sustainable Development		12
Strategic Environmental Assessment and Sustainability Appraisal		12
Habitats Regulation Assessment (HRA)		13
Methodology		14
Plan Area		14
3.0 OVERVIEW OF THE LOCAL PLAN		16
The Local Plan and National Planning Policy Framework (NPPF)		16
Local Plan Review		17
Early Engagement Consultation		18
January 2020 Publication Consultation		18
January 2021 Publication Consultation		18
4.0 CRAWLEY AND THE SUSTAINABILITY APPRAISAL TOPIC AREAS		20
Introduction to Crawley		20
Sustainability Appraisal Topic Areas		20
Current Sustainability Issues		22
The Sustainability Objectives and Indicators		25
5.0 SUBMISSION POLICY AND ALLOCATIONS/DESIGNATIONS APPRAISAL		28
Submission Local Plan Policy Appraisal		28
Summary of Key Findings and Significant Effects		28
The Mitigation of Policies with Negative Effects		30
Submission Local Plan Site Allocation/Designation Appraisal Methodology		31
Assessment of Site Allocations/Designations		33
GLOSSARY		34
Appendix A: Engagement Partners		36
Appendix B: Summary of Scoping and Early Draft Report Consultation Responses		37
Appendix C: Summary of Initial Publication Consultation Responses		51
Appendix D: Topic Area Baseline Information, Trends, Plans, Policies and Programmes		80
Topic Area A – Climate Change, Sustainability, Sustainable Design and Construction		81
Topic Area B – Heritage, Character, Design and Architecture		91
Topic Area C – Housing		95
Topic Area D – Economy		100
Topic Area E – Natural Environment		112
Topic Area F – Transport and Infrastructure		118
Topic Area G – Population, Community Facilities and Open Space, Crime and Health of the Community		125
Appendix E: Submission Local Plan Spatial Strategy Options and Appraisal		133
Appendix F: Submission Local Plan Policies Options and Appraisal		141
Appendix G: Submission Local Plan Site Allocations and Designations Appraisal		242

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 a recently 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 2019¹ 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 2021 – 2037. 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 100,000 jobs and, although the COVID-19 pandemic has impacted on the borough's aviation-led economy, it is anticipated that Crawley will respond and recover, with significant need for new business land and floorspace identified over the Plan period to 2037. 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 the borough. Many residents are employed in lower-skilled 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

¹ National Planning Policy Framework (2019) MHCLG <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

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. An Area of Outstanding Natural Beauty: 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; 11 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	Reliance on fossil fuels and high carbon energy supply. Uptake of Renewables.
Waste	Crawley falls within the West Sussex strategy for managing waste. Crawley should seek to promote sustainable waste management. Crawley Borough Council are 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 and this is the one located at Redhill, as 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.
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. 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.

Crawley's Sustainability Issues:	
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	The concentration of new development in Crawley and the surrounding area could increase the risk of flooding.
Water Supply	The potential for development to be concentrated in the Crawley area may lead to water supply issues, particularly given current levels of water stress.
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, 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.
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.

Crawley's Sustainability Issues:	
	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 moving from one dominated by large scale airport related business to one where professional services are becoming increasingly strong. The recent economic implications arising from COVID-19 have shown Crawley's economy to be very reliant on the aviation sector, and there is need to support economic recovery in the short-term and to diversify the economy over the medium to longer-term.
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 more recently 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 which had a positive impact on the local economy, supporting jobs on the airport and also indirectly in the local area, and encouraging businesses to locate and invest in the local area. However, many on-airport jobs are relatively low-skilled and in-commuting was increasing as residents don't have the skills to match the higher skilled opportunities. There is now also a need to support economic recovery of aviation related sectors, and also to diversify Crawley's economy so that it is more responsive to change.
Town Centre Neighbourhood	Challenges facing the town centre retail sector mean it is vital that the town centre is able to adapt to retain its vitality and viability. 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. Potential conflicts may occur between amenity-sensitive residential use and the need to support a vibrant night-time and evening economy. Types of dwellings and housing mix within the town centre pose challenges to ensure balanced community. However, this also increases needs for families living within the town centre.
6. To conserve and enhance the biodiversity habitats, key landscape features, fauna and flora 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.
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.

Crawley's Sustainability Issues:	
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 aging 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.

Identification and Assessment of Policies and Options

8. 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.
9. 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 all reasonable and realistic alternatives.

10. Each policy was assessed against the separate Sustainability Objectives, against a simplified criterion as detailed below:

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

Summary of Key Findings and Significant Effects

11. 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.

12. 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.

13. 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 still retains its neighbourhood principle approach.

Mitigation of Policies with Negative Impacts

14. 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 any 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 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 that potential negative effects of development are resolved.

Monitoring

15. 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. An EU Directive 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 2019, technical evidence and consultation feedback, and, following its examination and adoption, will result in a revised Local Plan for Crawley for the period 2021 – 2037.
- 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 draft report (consulted upon between July and September 2019 and between January and March 2020) have been taken into consideration whilst finalising the Crawley Local Plan for Full Council approval for Publication and Submission.

Structure of the Scoping Report

- 1.5 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.
 - Section 4 describes social (including health), environmental and economic issues of significance in Crawley; baseline data and relevant plans, policies and programmes. The data is presented by topic, with a summary of key issues identified and list of Sustainability Objectives at the start of the section.
 - Section 5 provides detail on the next steps of the SA/SEA process including identifying a monitoring framework, undertaking Appraisal of Local Plan options and the proposed structure of the Sustainability Report.

Consultation Arrangements

- 1.6 Consultation on the Draft Report will run alongside the additional Regulation 19 Publication consultation on the Local Plan Review. Feedback from the consultations will be used to inform the examination of the Local Plan, Sustainability Appraisal, and any further work on Habitats Regulations Assessment (HRA).

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

- 1.7 The document will be available for a six week public consultation period commencing 6 January 2021. We welcome any comments on this Draft Report. Should you wish to comment on the document, please do so on or before **5pm on 17 February 2021**.
- 1.8 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.
- 1.9 For further information about the Sustainability Appraisal and Strategic Environmental Assessment, please contact Elizabeth Bridgen on (01293) 438624 or e-mail strategic.planning@ Crawley.gov.uk
- 1.10 The Sustainability Appraisal/Strategic Environmental Assessment can be viewed 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 and Section 3
Annex 1 B Current state of the environment & likely evolution thereof without implementation of the plan.	Section 4 and Appendix D
Annex 1 C Environmental characteristics of areas likely to be significantly affected.	Sections 3 and 4, Appendix D, F and G
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.	Section 4 and Appendix D

SEA Directive Requirements	Location within Report
<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 and Appendix D
<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 and 5, Appendix D, E, F and G
<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 and 5, Appendix D, E, F and G
<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, Appendix E, F and G
<p>Annex 1 I A description of the measures envisaged concerning monitoring.</p>	Section 4, Appendix D, E, F and G
<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 A separate European Directive that relates to the Conservation of Natural Habitats and of Wild Fauna and Flora – the ‘European Habitats Directive’ (92/43/EEC) – requires an Appropriate Assessment (known as Habitats Regulations Assessment (HRA) in the UK) to be undertaken. 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 a draft HRA Screening Report. The findings of the Screening Report suggest 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 to suggest the conclusions of the Report were incorrect or fundamentally flawed. However, transport modelling has been carried out to

assess fully the impact of development proposed in the Local Plan together with the 'in combination' effects of the Plan alongside other Plans in the area. In addition, since the previous consultation, evidence through the Water Cycle Study has highlighted potential impacts from water abstraction. Further investigation of the likely impacts of Options has been undertaken in consultation with statutory bodies including Natural England. The findings of this work is published in a Draft HRA report.

Methodology

- 2.8 As this Local Plan Review is a focused update and refresh of a recently 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. This SA/SEA reviews the previous SA/SEA conclusions and updates where changes are proposed. Where relevant, new options will be considered against the approach taken in the adopted Plan.
- 2.9 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.
- 2.10 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.
- 2.11 The evidence base prepared for the Local Plan has been used as the basis for the SA baseline data where appropriate.
- 2.12 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 sustainable development could be found.
- 2.13 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. 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. These have been considered and incorporated into this current further draft SA/SEA document where considered appropriate.

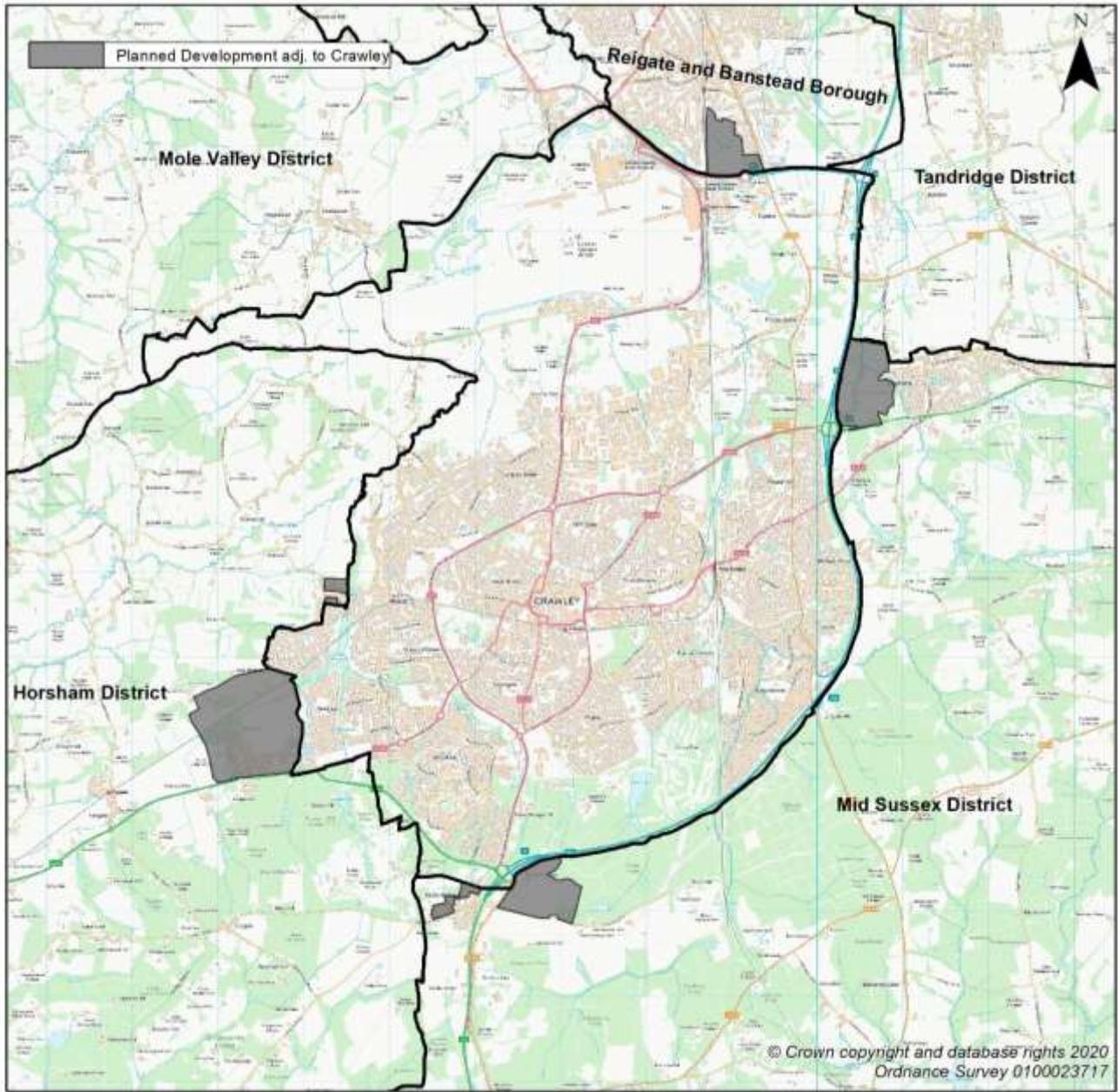
Plan Area

- 2.14 Broadly speaking, the focus of the Local Plan will be upon Crawley borough, see Figure 2.1. 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 below. Therefore, whilst the SA/SEA undertaken for such developments would be the responsibility of the relevant Planning Authority in which the site

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

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.

Figure 2.1: SA/SEA Boundary – The Borough of Crawley



3.0 OVERVIEW OF THE LOCAL PLAN

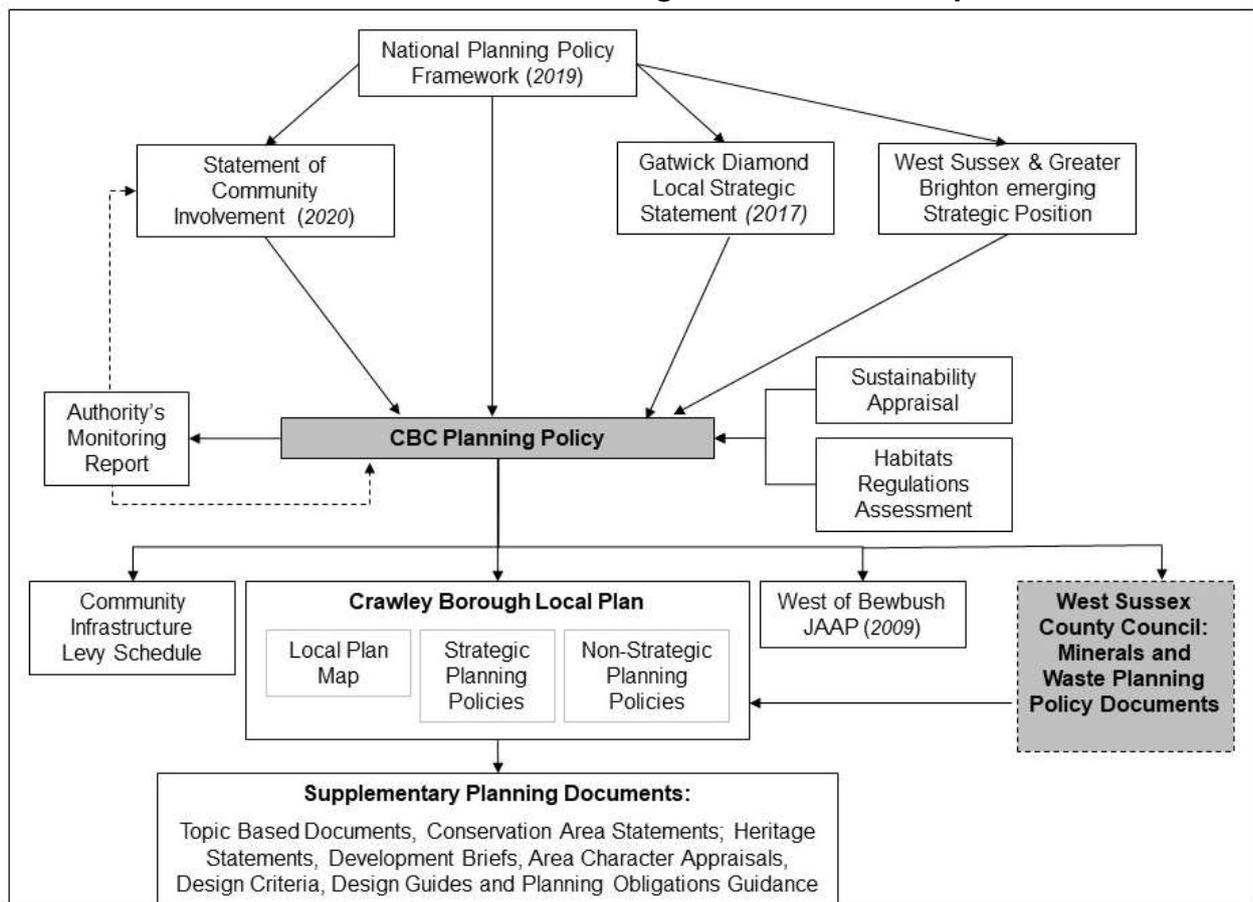
Introduction

- 3.1 In light of the requirement for Local Planning Authorities to maintain up-to-date Plans and review these every five years, 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 2019⁴ and has updated local evidence. A key aim of the Local Plan is to ensure that the borough continues to develop sustainably.
- 3.3 The new Local Plan remains to be a single document, setting out the policies to guide both strategic development and development management over the period 2021 – 2037. These policies will replace the adopted Crawley Borough Local Plan 2015 – 2030 policies.

The Local Plan and National Planning Policy Framework (NPPF)

- 3.4 Crawley currently has an adopted up-to-date Local Plan (2015); 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. In addition, West Sussex County Council have adopted the Joint Minerals Local Plan (2018) and the Waste Local Plan (2014) which cover the Crawley borough area. A simplified diagram of the key documentation accompanying the adopted Local Plan is shown at Figure 3.1.

Figure 3.1: Relationship between documents



⁴ National Planning Policy Framework (2019) MHCLG <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

- 3.5 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.
- 3.6 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.
- 3.7 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.

Local Plan Review

- 3.8 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 (11.3 years supply for 2019-2024);
 2. Exceeds the Housing Delivery Test (2019 Housing Delivery Test result for Crawley = 235%);
 3. Secures 40% affordable housing on residential developments with planning permission;
 4. Success in appeals (108 appeals in total between April 2015 and March 2020; of which 77 (71%) were dismissed and 29 were allowed, and two allowed in part);
 5. Progress on town centre development sites (one complete, two under construction; one with planning permission);
 6. Adoption of five Supplementary Planning Documents, two Development Briefs and five Conservation Area Statements.
- 3.9 Despite there being no urgent need to review the Local Plan, the council began to undertake its review in August 2018, following the 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.
- 3.10 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.
- 3.11 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.
- 3.12 It was believed this 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). The review of the adopted Local Plan also affords the council the opportunity to build upon the lessons learnt during the preparation of the existing Local Plan.
- 3.13 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 Submission Consultation	6 January – 17 February 2021
Submission	March 2021
Examination (estimated)	May – September 2021
Adoption	March 2022

3.14 Within the Topic areas listed in the following chapter, the plans and programmes most relevant are highlighted in detail. 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

3.15 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 18⁵. 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.

3.16 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 Publication Consultation

3.17 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 19⁶, 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 Publication Consultation

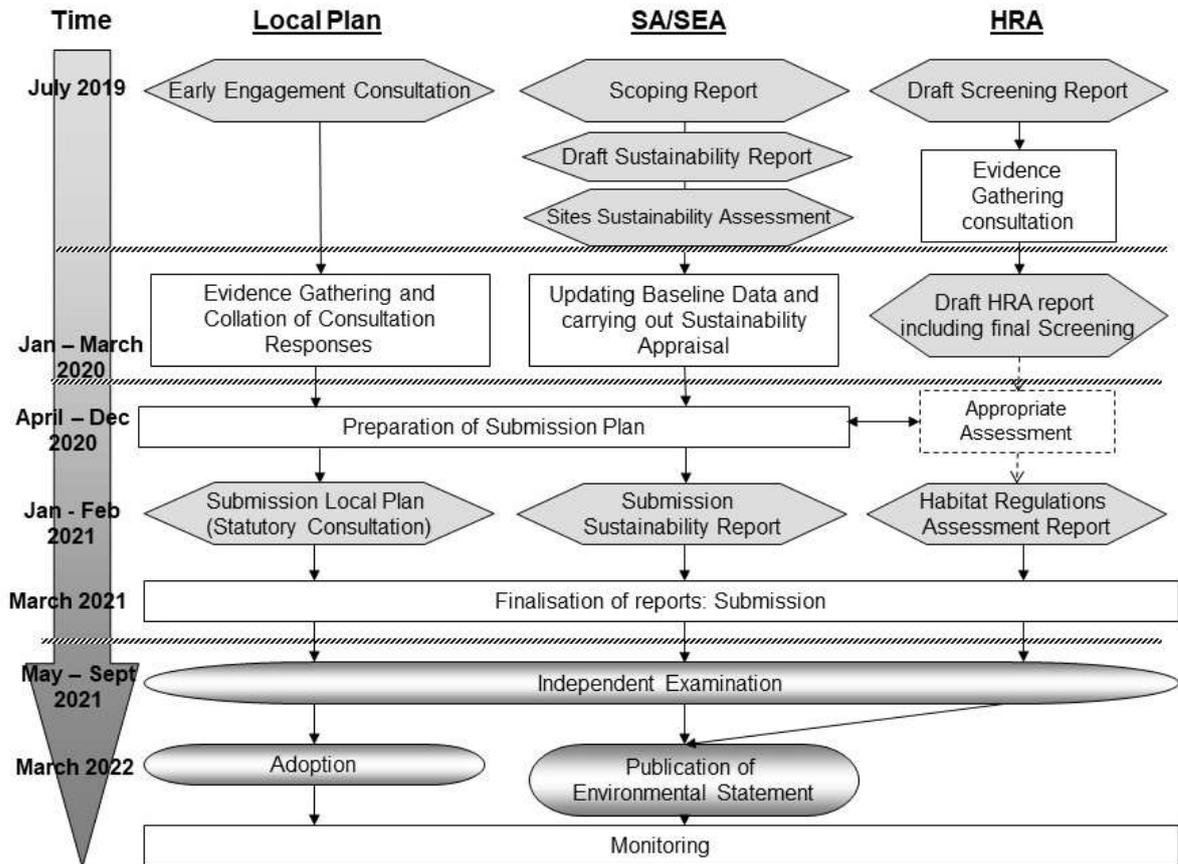
3.18 This updated draft SA/SEA Report is now available for consultation in tandem with the additional Regulation 19 consultation on the Local Plan Review. The Local Plan addresses development proposals including the long-term housing and employment land supply position for the period up to 2037. It includes 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.

⁵ Regulation 18, Town and Country Planning (Local Planning) (England) Regulations 2012: <https://www.legislation.gov.uk/uksi/2012/767/contents/made>

⁶ Regulation 19, Town and Country Planning (Local Planning) (England) Regulations 2012: <https://www.legislation.gov.uk/uksi/2012/767/contents/made>

3.19 The major objectives for the Local Plan were determined using the evidence base and consultation feedback. The early engagement consultation and preparation of draft policies and options for the Local Plan have identified 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. 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 8 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 neighbourhood⁷.
- 4.5 As established in paragraph 2.15 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 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 of Crawley.

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.
- 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

⁷ There were 219 residential units in 2014; and there are now close to 900 residential units currently in 2020; a further 2,200 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.

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 adoption⁸. Since its adoption, the Local Plan has been regularly monitored against the policy and SA indicators. The outcomes of this monitoring has been published in the Authority's Monitoring Reports⁹.
- 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, Sustainability, Sustainable Design and Construction	energy efficiency, flooding, air quality, noise, water, waste, climate change and water supply	<i>Material Assets, Water, Air, Climatic Factors</i>
B	Heritage, Character, Design and Architecture	urban design, urban environment, cultural heritage	<i>Cultural Heritage</i>
C	Housing	housing need, aspirations, strategic development locations	
D	Economy	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	
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>

⁸ [LP141 Monitoring and Implementation Framework for the Crawley Local Plan 2015-30 \(2015\)](#)

⁹ [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](#)

Current Sustainability Issues

4.10 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	Reliance on fossil fuels and high carbon energy supply. Uptake of Renewables.
Waste	Crawley falls within the West Sussex strategy for managing waste. Crawley should seek to promote sustainable waste management. Crawley Borough Council are 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 and this is the one located at Redhill, as 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.
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. 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	The concentration of new development in Crawley and the surrounding area could increase the risk of flooding.
Water Supply	The potential for development to be concentrated in the Crawley area may lead to water supply issues, particularly given current levels of water stress.
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 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, land supply in the borough is severely limited, meaning the borough's

Crawley's Sustainability Issues:	
	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.
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 moving from one dominated by large scale airport related business to one where professional services are becoming increasingly strong. The recent economic implications arising from COVID-19 have shown Crawley's economy to be very reliant on the aviation sector, and there is need to support economic recovery in the short-term and to diversify the economy over the medium to longer-term.
Retail Competitiveness	The retail sector of the town's economy has been declining in recent years, and there is nationally an increase in e-retailing. 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 which has had a positive impact on the local economy, supporting jobs on the airport and also indirectly in the local area, and encouraging businesses to locate and invest in the local area.

Crawley's Sustainability Issues:	
	<p>However, many on-airport jobs are relatively low-skilled and in-commuting is increasing as residents don't have the skills to match the higher skilled opportunities.</p> <p>There is now also a need to support economic recovery of aviation related sectors, and also to diversify Crawley's economy so that it is more responsive to change.</p>
Town Centre Neighbourhood	<p>Challenges facing the town centre retail sector mean it is vital that the town centre is able to adapt to retain its vitality and viability.</p> <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. Potential conflicts may occur between amenity-sensitive residential use and the need to support a vibrant night-time and evening economy.</p> <p>Types of dwellings and housing mix within the town centre pose challenges to ensure balanced community. However, this also increases needs for families living within the town centre.</p>
6. To conserve and enhance the biodiversity habitats, key landscape features, fauna and flora 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.
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.</p> <p>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	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.

Crawley's Sustainability Issues:	
Ageing Population	Due to its New Town history, Crawley has an increasingly aging 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.

The Sustainability Objectives and Indicators

4.11 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. 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 CO₂ 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 capita; • Proportion of household waste recycled or composted.
2. To adapt to the effects of climate change by reducing the negative consequences of changes in the climate on people and the environment, or by achieving a positive outcome from the effects of climate change.	<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.
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.	<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 5 years); • Proportion of the borough covered by up-to-date Area-Wide Character and Design Assessments.

Objectives	Examples of Indicators
<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 (5-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 B-class 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.</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.
<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 developments which achieves the appropriate minimum densities set out in Policy CL4; • Children travelling to school – mode of transport usually used;

Objectives	Examples of Indicators
	<ul style="list-style-type: none"> • Number of people killed or seriously injured in road traffic accidents per 100,000; • 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).
<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 SUBMISSION POLICY AND ALLOCATIONS/DESIGNATIONS APPRAISAL

Submission Local Plan Policy Appraisal Summary

- 5.1 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 5.1.
- 5.2 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 (--)

- 5.3 Detailed commentary is provided in Appendix F to explain the reasons behind the assessment in each case.
- 5.4 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 all reasonable and realistic alternatives.

Summary of Key Findings and Significant Effects

- 5.5 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 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.

5.6 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.

5.7 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 still retains its neighbourhood principle approach.

Table 5.1: Local Plan Policies Sustainability Appraisal Overview

Local Plan Policy	SA Objective								
	1	2	3	4	5	6	7	8	9
SD1	++	++	++	+	+	++	++	++	++
SD2	+	0	0	0	0	+	+	+	+
CL1	+	+	++	++	+	+	++	++	++
CL2	++	++	++	++	+	++	++	+	++
CL3	++	++	++	++	+	+	++	++	++
CL4	++	++	+	++	+	+	++	++	++
CL5	+	+	+	++	+	+	++	+	++
CL6	+	++	++	+	+	++	+	+	++
CL7	/	+	++	/	/	++	+	+	+
CL8	+	/	+	/	/	+	+	/	+
CL9	/	/	+	/	/	++	/	+	+
DD1	++	++	++	+	+	+	++	+	+
DD2	0	0	+	++	+	0	+	/	++
DD3	+	+	+	+	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	+
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

Local Plan Policy	SA Objective								
	1	2	3	4	5	6	7	8	9
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	0	+	+	-?	+	+	/	0	+
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	+
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

5.8 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 that potential negative effects of development are resolved.

Submission Local Plan Site Allocation/Designation Appraisal Methodology

- 5.9 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.
- 5.10 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 further 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	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? Is the site contaminated or are there pedestrian pathways linking the site with contaminated land? Can the site be remediated? Is the development impacted by noise (through adjacent road, airport, rail or industrial usage), or will the site itself result in noise increases? Will the development site impact negatively or positively on air quality? Will the development maintain or enhance water quality in rivers or groundwater?
2. To adapt to the effects of climate change, by reducing the negative consequences of changes in the climate on people and the environment, or by achieving a positive outcome from the effects of climate change.	Flood Risk and Drainage; Sustainable Development Design; Effective Water Management	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?
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?
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?

Sustainability Objective	Key Topics for Site Allocations	Assessment Criteria
5. To maintain, support and promote a diverse employment base that can serve the local and sub-regional and regional economy.	Economic Development	<p>Would the development proposal assist in maintaining, supporting or enhancing the local economy of the area?</p> <p>Would the development support the delivery of B-class business floorspace?</p> <p>Would the development support delivery of other forms of employment?</p> <p>Would the development support the vitality and viability of Crawley Town Centre?</p>
6. To conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough.	Protection of Environmental Designations; Conservation and Enhancement of Biodiversity Habitats	<p>Would the development proposal impact upon an existing or future environmental designation (such as a Local Wildlife Site or the AONB)?</p> <p>Will there be any loss to biodiversity, or damage to the landscape as a result of the delivery of the site?</p> <p>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.	Sustainable Transport: Highways/Rail Cycling/Pedestrian	<p>Would the development increase highway and/or rail usage and would this have a detrimental impact upon highway and/or rail congestion?</p> <p>Is the site proposal located in close proximity to sustainable transport links in order for the occupants to reach essential services and facilities?</p> <p>Is the need for a 'private' car reduced?</p> <p>Is the site close to both the pedestrian and/or cycling network?</p>
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>
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 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>

Sustainability Objective	Key Topics for Site Allocations	Assessment Criteria
		<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

- 5.11 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 5.2 above.
- 5.12 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.

Area of Outstanding Natural Beauty (AONB)

A national landscape designation which aims to conserve and enhance the natural beauty of the landscape.

Built-up Area 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 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, with the most recent version published in February 2019.

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.

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
Highways England
NHS Sussex/CCG
Neighbouring Authorities (Horsham, Mid Sussex, Mole Valley, Reigate & Banstead, and Tandridge Councils)
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

APPENDIX B: SUMMARY OF SCOPING AND EARLY DRAFT REPORT CONSULTATION RESPONSES

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>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</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>

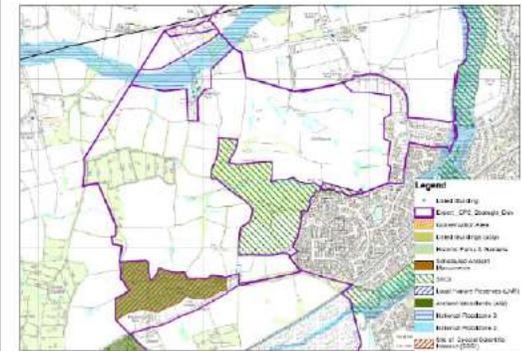
SUSTAINABILITY APPRAISAL/STRATEGIC ENVIRONMENTAL ASSESSMENT				
Representor/ Representation Reference	Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			<p>Crawley's numerous green spaces so as to make this a major contribution to delivering a net gain in biodiversity. It is hard to see how 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> <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</p>	<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).</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</p>

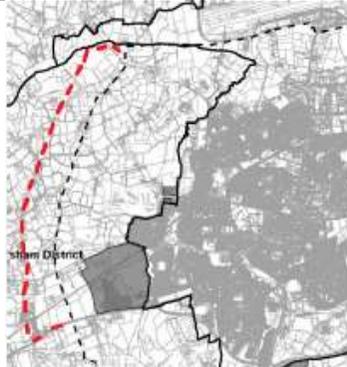
SUSTAINABILITY APPRAISAL/STRATEGIC ENVIRONMENTAL ASSESSMENT				
Representor/ Representation Reference	Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			<p><i>'A supply-led housing figure is recommended in view of the constrained nature of the borough in terms of land supply. It is considered 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.</i></p> <p><i>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 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.</p>	the borough's identified affordable housing need (assuming an affordable housing requirement of 40%).
REP184/733	Sussex Wildlife Trust		<p>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</p>	Concerns regarding the effectiveness of measuring the value of the natural environment within the Sustainability Appraisal are noted. New indicators

SUSTAINABILITY APPRAISAL/STRATEGIC ENVIRONMENTAL ASSESSMENT				
Representor/ Representation Reference	Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			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.	have been added to help monitoring of various habitat designations.
REP185/748	Carter Jonas on behalf of Homes England		<p>CRAWLEY BOROUGH COUNCIL LOCAL PLAN REVIEW 2020-2035 - SUSTAINABILITY APPRAISAL SCOPING REPORT (JULY 2019)</p> <p>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.</p> <p>Homes England works in collaboration with partners who share our ambition. These include local authorities, private developers, housing 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</p>	

SUSTAINABILITY APPRAISAL/STRATEGIC ENVIRONMENTAL ASSESSMENT				
Representor/ Representation Reference	Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			<p>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 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 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> <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</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>

SUSTAINABILITY APPRAISAL/STRATEGIC ENVIRONMENTAL ASSESSMENT				
Representor/ Representation Reference	Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			<p>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 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."</i> (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</p>	

SUSTAINABILITY APPRAISAL/STRATEGIC ENVIRONMENTAL ASSESSMENT				
Representor/ Representation Reference	Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			<p><i>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>  <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>	

SUSTAINABILITY APPRAISAL/STRATEGIC ENVIRONMENTAL ASSESSMENT				
Representor/ Representation Reference	Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			 <p>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.</p>	
REP185/749	Carter Jonas on behalf of Homes England		<p>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.</p>	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		<p>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.</p>	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		<p>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</i></p>	Policy GAT2, safeguarding, has now been deleted from the Local Plan as the council does not consider there is

SUSTAINABILITY APPRAISAL/STRATEGIC ENVIRONMENTAL ASSESSMENT				
Representor/ Representation Reference	Organisation	Policy/ Para/ Page No.	Comments	CBC Response
	Homes England		<p><i>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 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>	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 alongside other development and infrastructure needs, as well as environmental protection requirements. The AAP will be the subject of its own SA/SEA.
REP185/752	Carter Jonas on behalf of Homes England		<p>Strategic Policy H1: Housing Provision 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 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 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</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/STRATEGIC ENVIRONMENTAL ASSESSMENT				
Representor/ Representation Reference	Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			upon adoption, Homes England suggest the first paragraph should include this requirement.	sustainability appraisal and policy GI2.
REP185/755	Carter Jonas on behalf of Homes England		Strategic Policy GI4: Local Green Space 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.	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, 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		Policy ST3: Improving Rail Stations 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> . 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>	Policy and supporting text amended.
REP185/757	Carter Jonas on behalf of Homes England		Policy ST4: Safeguarding of a Search Corridor for a Crawley Western Relief Road 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	The eastern section of the Search Corridor has been deleted. The corridor is included and referenced in the Area Action Plan policy.

SUSTAINABILITY APPRAISAL/STRATEGIC ENVIRONMENTAL ASSESSMENT				
Representor/ Representation Reference	Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			extension of Manor Royal and add to the employment land pipeline – a key priority of the Council.	
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 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>	Support noted. Updated SFRA and Water Cycle Study is underway.
REP196/814	Environment Agency		<p>Sustainability Appraisal/Strategic Environmental Assessment Scoping Report and Draft Report</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>	Documents updated and added in paragraph A3. Updated SFRA and Water Cycle Study will assess latest evidence in Resource Management Plans.

SUSTAINABILITY APPRAISAL/STRATEGIC ENVIRONMENTAL ASSESSMENT				
Representor/ Representation Reference	Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			<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 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>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</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>

SUSTAINABILITY APPRAISAL/STRATEGIC ENVIRONMENTAL ASSESSMENT				
Representor/ Representation Reference	Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			<p><i>(which is directly related to sewerage provision) has not been adequately addressed in the Local Plan.</i></p> <p><i>Page 21, A16 – “There is a risk that potential new strategic development and increased population, combined with the level of economic 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>	<p>Support for water stress policy noted.</p>

APPENDIX C: SUMMARY OF INITIAL PUBLICATION CONSULTATION RESPONSES

Sustainability Appraisal/Strategic Environmental Assessment			
Ref. No.	Respondent	Policy/ Para	Comments
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 birds of conservation concern, as well as wider adverse biodiversity impacts if any of this overflow is built on the High Weald AONB</p>

Sustainability Appraisal/Strategic Environmental Assessment			
Ref. No.	Respondent	Policy/ Para	Comments
			<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 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>

Sustainability Appraisal/Strategic Environmental Assessment			
Ref. No.	Respondent	Policy/ Para	Comments
			<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. 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>” 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 - 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.</p>

Sustainability Appraisal/Strategic Environmental Assessment			
Ref. No.	Respondent	Policy/ Para	Comments
			<p>- 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> <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> <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	Sustainability Appraisal/ Strategic	<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</p>

Sustainability Appraisal/Strategic Environmental Assessment			
Ref. No.	Respondent	Policy/ Para	Comments
	of HX Properties Ltd	Environment Assessment GAT2 Options 1 and 2	<p>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> <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>

Sustainability Appraisal/Strategic Environmental Assessment			
Ref. No.	Respondent	Policy/ Para	Comments
			<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 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</p>

Sustainability Appraisal/Strategic Environmental Assessment			
Ref. No.	Respondent	Policy/ Para	Comments
			<p>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 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>

Sustainability Appraisal/Strategic Environmental Assessment			
Ref. No.	Respondent	Policy/ Para	Comments
			<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> <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</p>

Sustainability Appraisal/Strategic Environmental Assessment			
Ref. No.	Respondent	Policy/ Para	Comments
			<p>2015 (As Amended). However, as your officers will appreciate, the phrase “operational building” is defined in Schedule 2 Part 8 Class O as meaning “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”. 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 “Manor Royal”, 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> <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: “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.”</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>

Sustainability Appraisal/Strategic Environmental Assessment			
Ref. No.	Respondent	Policy/ Para	Comments
			<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 generally from a wider sustainability perspective, and in particular the consequences for those using hotels, as well as on issues of resourcing.</p>
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</p>

Sustainability Appraisal/Strategic Environmental Assessment			
Ref. No.	Respondent	Policy/ Para	Comments
			<p>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: <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> <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>

Sustainability Appraisal/Strategic Environmental Assessment			
Ref. No.	Respondent	Policy/ Para	Comments
			<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) 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/061	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>

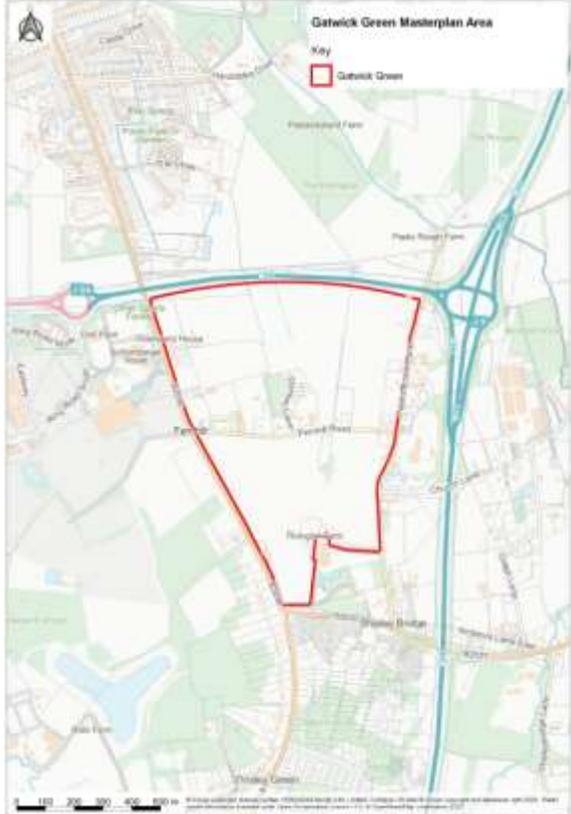
Sustainability Appraisal/Strategic Environmental Assessment			
Ref. No.	Respondent	Policy/ Para	Comments
REP/062	Environment Agency	SA/SEA Sustainability Appraisal/ Strategic Environment Assessment	<p>SUSTAINABILITY APPRAISAL Water resources and efficiency In the table below para 5.11, "Reduction of Water Consumption" is one of the key topics, but there is no relevant assessment criterion.</p> <p>References on p51 & p86: Thames Water has published a "Revised draft Water Resources Management Plan 2019" and updates to it. 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'</i>¹³⁸. <i>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: Flood Risk 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>

Sustainability Appraisal/Strategic Environmental Assessment			
Ref. No.	Respondent	Policy/ Para	Comments
			We hope you find our comments useful. If you have any queries please do not hesitate to contact me.
REP/068	Sussex Wildlife Trust	SA/SEA Sustainability Appraisal/Strategic Environment Assessment	<p>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. 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)¹⁰ 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>

¹⁰ Sustainability Appraisal / Strategic Environmental Assessment, Draft Report for the Submission Local Plan, Crawley Borough Council, January 2020

Sustainability Appraisal/Strategic Environmental Assessment			
Ref. No.	Respondent	Policy/ Para	Comments
			<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 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 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>

Sustainability Appraisal/Strategic Environmental Assessment			
Ref. No.	Respondent	Policy/ Para	Comments
			<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 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.</p> <p>SEA for Gatwick Green</p>

Sustainability Appraisal/Strategic Environmental Assessment			
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			<p>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.</p> <p>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.</p> <p>Appendices were sent by email dated 2/3/20. Appendix 1 Site Plan without TWG land</p>  <p>The map, titled 'Gatwick Green Masterplan Area', shows a large area outlined in red. A key in the top right corner indicates that the red outline represents 'Gatwick Green'. The map includes various geographical features such as roads, green spaces, and water bodies. A scale bar at the bottom left indicates distances up to 800 meters. A north arrow is located in the top left corner.</p>

Sustainability Appraisal/Strategic Environmental Assessment			
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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)¹¹, 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 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</p>

¹¹ SUSTAINABILITY APPRAISAL / STRATEGIC ENVIRONMENTAL ASSESSMENT DRAFT REPORT For the Submission Local Plan, Crawley BC, January 2020

Sustainability Appraisal/Strategic Environmental Assessment			
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			<p>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 data¹² 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.

¹² 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"> <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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Sustainability Appraisal/Strategic Environmental Assessment

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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> <p>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.</p> <p>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.</p> <p>The impacts would therefore be Possible Positive Impact +?.</p> </td> </tr> <tr> <td>2. 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Ref. No.	Respondent	Policy/ Para	Comments
			<p>Conclusion</p> <p>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 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.

Sustainability Appraisal/Strategic Environmental Assessment			
Ref. No.	Respondent	Policy/ Para	Comments
REP/069	Natural England	Sustainability Appraisal	<p>Planning consultation: Submission draft Crawley Local Plan (Regulation 19) 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: 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, 2019)
- 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 2018-2022 (CBC, 2018)
- Climate Emergency Declaration (CBC, 2019)
- Carbon & Waste Reduction Strategy (CBC, 2010)
- West Sussex Plan 2017-2022 (2017)

Climate Change

- Energy Performance of Building Directive (2018/844/EU)
- Climate Change Act (2008)
- Planning and Compulsory Purchase Act (2004)
- Planning and Energy Act (2008)
- National Planning Policy Framework (MHCLG, 2019)
- 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

- 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, 2020)
- 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
- Draft Water Resources Management Plan 2019 (South East Water, 2018)
- Draft Water Resources Management Plan 2019 (Thames Water, 2018)
- Draft Water Resources Management Plan 2019 (Sutton and East Surrey Water, 2018)
- Water Resources Management Plan 2019, Addendum to Statement of Response (Southern Water, 2018)

Noise

- The Environmental Noise Directive (2002/49/EC)
- Environmental Noise (England) Regulations (as amended)
- National Planning Policy Framework (MHCLG, 2019)
- 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, 2015)
- Gatwick Airport Noise Management Action Plan 2015-2018 (Gatwick Airport Limited, 2015)

Air Quality

- The Industrial Emissions Directive (2010/75/EU)
- National Emissions Ceiling (NEC) Directive (2016/2284/EU)
- National Planning Policy Framework (MHCLG, 2019)
- Planning Practice Guidance: Air Quality (MHCLG, 2014)
- 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, 2019)
- Crawley Borough Council Annual Status Report on Air Quality (2018)

Waste and Minerals

- National Planning Policy Framework (MHCLG, 2019)
- 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 carbon emissions for the borough of Crawley during 2011 were 751 Kilo-tonnes CO₂¹³. Within the gross total of 759 Kilo-tonnes the domestic contribution was 178 Kilo-tonnes CO₂ and industry 331 Kilo-tonnes (BEIS, UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2018). By 2018, the total net carbon emissions had fallen to 588.4 Kilo-tonnes CO₂, with the 178 Kilo-tonnes CO₂ for domestic use falling to 135 Kilo-tonnes CO₂ and industry use falling to 213 Kilo-tonnes CO₂.
- A6 Carbon emissions from transport (not including aviation) in Crawley fluctuated within the 220-250 kilo-tonne range over the period 2011-18, as emissions from other sources declined. This meant that transport emissions increased as a proportion of Crawley’s total from 32 to 42 per cent of gross CO₂ 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 CO₂ emissions for West Sussex by sector for 2018

Local Authority	Industry and commercial (kilo-tonnes)	Domestic (kilo-tonnes)	Road Transport (kilo-tonnes)	Total (kilo-tonnes)*	Population ‘000s (mid- year estimate 2018)	Per capita emissions (tonnes)
Adur	44	83	97	221	63.9	3.5
Arun	129	233	210	545	159.8	3.4
Chichester	257	206	307	643	120.8	5.3
Crawley	213	135	249	588	112.4	5.2
Horsham	191	228	302	649	142.2	4.6
Mid Sussex	162	228	315	635	149.7	4.2
Worthing	94	147	91	329	110	3.0
West Sussex	1089	1261	1570	3610	858.9	4.2
Total						
South East Total	11731	13252	19677	42746	9133.6	4.7

Source: UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2018, BEIS, 2020

*Includes net effect of Land Use, Land Use Change, and Forestry. Figures therefore differ from combined commercial/ transport/ domestic total.

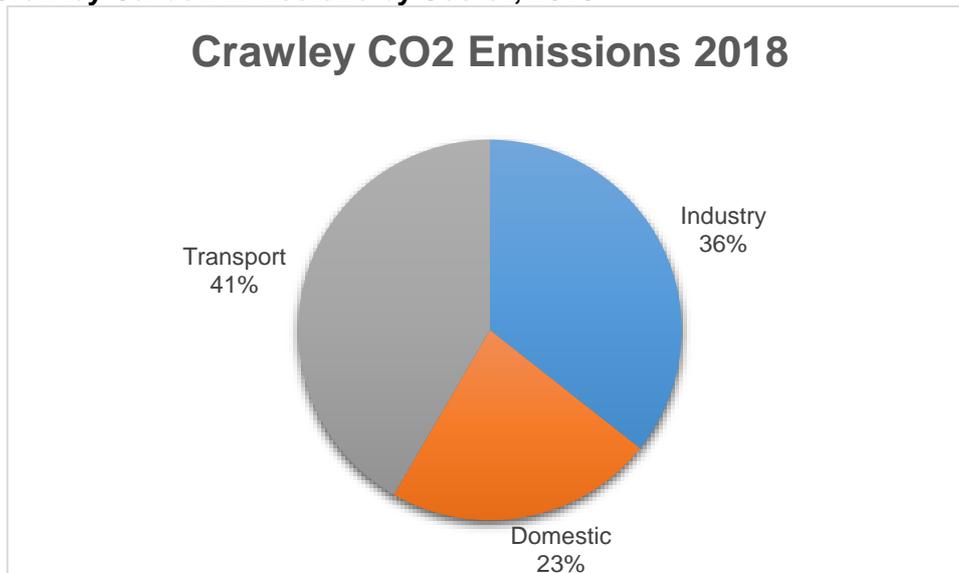
Table A2: CO₂ emissions trends 2010-2017 Crawley and the South East

	Total CO ₂ emissions (tonnes per person)							
	2011	2012	2013	2014	2015	2016	2017	2018
Crawley	67.0	7.2	6.8	6.0	5.8	5.5	5.3	5.2
West Sussex	5.6	5.8	5.5	4.9	4.7	4.5	4.3	4.2
South East	6.2	6.4	6.1	5.5	5.3	5.0	4.8	4.7

Source: UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2018, BEIS, 2020

¹³ These figures do not include emissions from aviation, which is not counted in local statistics.

Figure A1: Crawley Carbon Emissions by Sector, 2018



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, 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 Authority activity	CO ₂ emissions generated by council buildings and vehicles have fallen from 5.2 to 4.6 million kilograms per annum over the period 2014-2019. With procurement, employee commuting, and water supply/waste water use included the 2019 total was 35.0 million kg.		Since 2014/15, the council has achieved a small fall in CO ₂ emissions.	CBC Sustainability Team; CBC Authority Monitoring Report
A2	Per capita CO ₂ emissions in the local	2018: Domestic: 1.20 tonnes Industry:	2018 South East: Domestic 1.45 tonnes Industry:	While the domestic figures compare favourably with the South East, total	UK local authority and regional carbon dioxide emissions national

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
	authority area	1.89 tonnes Transport: 2.21 tonnes LULUCF: -0.08 tonnes Total Net Emissions: 5.2 tonnes per capita	1.28 tonnes Transport: 2.15 tonnes LULUCF -0.21 tonnes Total Emissions SE – 4.7 tonnes per capita	emissions are higher than the regional average due to a high contribution from industrial and commercial activity in the borough. However, Crawley's total CO2 emissions have decreased by 20% from 2011	statistics: 2005 to 2018, BEIS, 2020
A3	Quantity of Residual household waste collected per capita;	205 kg per capita in 2018/19		Mostly stable trend	Crawley Borough Council Authority Monitoring Report
A4	Proportion of household waste recycled or composted;	39.3 per cent in 2018/19		Recent increase in proportion of waste recycled/composted	Crawley Borough Council Authority Monitoring Report

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. 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.
- 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.
- 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 a SuDS policy, 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). 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.

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, and ensure 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, 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 in 2017/18 or 2018/19.			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 the issue of water stress can be addressed.

A18 The South East continues to be identified as being subject to 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. This Gatwick Sub-Region Water Cycle Study (2020) flags water stress as a significant issue for Crawley, with advice from Natural England setting out that groundwater abstraction at Hardham in Horsham District, which during certain conditions is a significant source of Crawley's supply, may have an adverse effect on the integrity of the Arun Valley SAC, SPA and Ramsar features. 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.

Likely evolution without the continued implementation of the Local Plan

A19 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 2036. 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.

What the Local Plan can and cannot do

A20 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 and evidence from Water Infrastructure providers to encapsulate its recommendations. This will ensure that where planning permission is required, development is planned in a sustainable manner that pushes towards the achieving of 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.

Indicator No.	Indicator	Crawley Data	Trend	Data Sources
A6	Per capita water consumption	2017/18 Southern Water – 129 l/p/d South East Water – 150 l/p/d SES Water – 160 l/p/d	In the areas covered by Southern Water, South East Water and SES Water, there had been a small reduction in daily water consumption in the five years to 2017, but per capita consumption in 2018-19 was higher due to the hot weather. The Regional Economic Strategy target was 135 litres per day by 2016 and Government aspiration as set out in Future Water (Defra 2008) is for a reduction to 130 litres per person per day by 2030. Southern Water have introduced a 100 litre per person per day target.	Defra Water Conservation Report (2018 and 2019) Southern Water Target 100.

Issue: The potential for development to be concentrated in Crawley may lead to sewerage capacity problems

A21 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 undertakes modelling of anticipated growth over the Plan period.

A22 Based on the level of growth identified in the WCS it is anticipated Crawley Waste Water Treatment Works will exceed its flow permit during the Plan period (between 2025 and 2030) if no action was taken. Thames Water has identified that based on the WCS numbers significant infrastructure upgrades will be required. However, this represents a ‘worst case’ growth impact on Crawley WwTW, and further work is being undertaken to assess the impact of updated employment and housing growth figures. Subject to the outcomes of this work, phasing of development may be required as part of ongoing liaison with Thames Water.

Likely evolution without the continued implementation of the Local Plan

A23 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. Without the Local Plan it would therefore be more difficult for Thames Water to plan for and deliver an adequate service.

What the Local Plan can and can't do

A24 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

- A25 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.
- A26 Air Quality in Crawley is mainly good, with national targets being met for all pollutants, with the exception of nitrogen dioxide (NO₂) at a small number of locations alongside busy roads and within the designated Hazelwick AQMA, where the Council is targeting actions to improve air quality.
- A27 A small reduction in nitrogen dioxide levels was seen at all of Crawley’s monitoring site during 2018. This pattern was also seen regionally and is often attributed to climatic influences, rather than local conditions. It is therefore more informative to look at the long term trends. 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.
- A28 In 2018, there were no exceedances of the hourly objective for nitrogen dioxide, but two sites within the Hazelwick Road AQMA exceeded the annual objective for nitrogen dioxide, and a further two sites close to Three Bridges Station, also showed exceedances of the objective levels. This area adjoins the south eastern border of the existing Hazelwick Road AQMA, and it is therefore proposed to extend the boundary of the existing AQMA to incorporate this newly identified area of exceedance.
- A29 1,900 dwellings being developed at the new Forge Wood neighbourhood represent a potential source of vehicle pollution which may cause existing and new areas in Crawley to exceed the objective levels.
- A30 The council intends to build upon the improving air quality picture across the borough by developing 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

A31 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

A32 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 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. 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	Exceedances of the NO ₂ 40 µg/m ³ annual mean objective were found at seven roadside sites in 2018	The air quality objective is 40µg/m ³ . In 2018 there was a slight decrease in NO ₂ levels across Crawley for the second year in succession. Long term (15yr) trends in Crawley show that levels of NO ₂ at roadside, background and airport sites continues to be downwards. The only exception to this is within the AQMA where the long term trend continues to be upwards.	CBC 2019 Air Quality Annual Status Report
A9	Trends in annual mean PM ₁₀ concentrations	The air quality objective is 40µg/m ³ .	Results show annual mean PM ₁₀ concentrations decreased slightly in 2018 (17.5µg/m ³ vcm corrected), with no exceedances of the annual mean or daily mean objectives measured at the automatic monitoring site on the eastern boundary of the airport.	CBC 2019 Air Quality Annual Status Report
A10	Proportion of new dwellings with single aspect windows facing within 45 degrees of east, west and south.	In 2018/19 the relevant figure was 132 dwellings out of 515 completed, representing 26% of the total.		CBC Planning Register; Crawley Borough Council Authority 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.

A33 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.

A34 Gatwick Airport is a significant source of noise pollution in Crawley. Currently, a wide area, particularly to the south of the existing operational runway are 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.

A35 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

A36 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 will likely be considered as nationally Significant Infrastructure, and will be taken by the Secretary of State, outside of Crawley’s Local Plan.

What the Local Plan can and cannot do

A37 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 use built in areas currently and potentially affected by unacceptable noise.	The 2015 Local Plan permitted noise sensitive development up to the 66 dB (A)Leq noise contour The new Local Plan permits noise sensitive development up to the 60dB (A)Leq noise contour. The reasoning for having a lower level than for surface transport sources (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.	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; CBC Authority Monitoring Report

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’ of the neighbourhoods and the quality of the town’s environment, but 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, and the importance of how 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.

Topic Area B – Heritage, Character, Design and Architecture

Including urban design, urban environment, cultural heritage

SEA Directive – Cultural Heritage

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, 2019)
- Planning Practice Guidance (MHCLG, 2018)

Heritage

- Heritage Statement: One Year On (DCMS, 2018)
- Culture White Paper (DCMS, 2016)
- Crawley Borough Council Corporate Heritage Strategy (2008)
- 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)
- Living with beauty: report of the Building Better, Building Beautiful Commission (MHCLG 2020)
- Crawley Baseline Character Assessment (2009)
- Building for Life – Evaluating Housing Proposal Step by Step (2008)
- 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
- Housing Space Standards (GLA, 2006)
- 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 11 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) and Hazelwick Road (Three Bridges).
- 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.
- 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, Research suggests net densities of 60 dwellings per hectare are necessary to sustain a dependable, frequent and high capacity public transport service, 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, showing how and why people experience, appreciate and enjoy a place.
- 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. Crucially, compact development form needs to be carefully stitched and moulded into its surroundings, guided by the existing character of an area.
- 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

B13 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 culturally important areas of the town can continue to be protected.

B14 Local Plan policy and guidance is essential in order to establish new development form for larger schemes based on sustainable compact layout and scale making the best use of land, taking advantage of sustainable transport options and encouraging modal shift. In particular, it can promote medium and higher density ranges in specific, more sustainable 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 eleven Conservation Areas (45%) have up to date statements as of July 2020.	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-Wide Character and Design Assessments.	0 currently: Not currently monitored. However, future data will serve as a baseline	N/A		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, 2019)
- The Town and Country Planning (Permission in Principle) Order 2017
- Housing and Planning Act 2016
- National Design Guide (MHCLG, October 2019)
- Living with beauty: report of the Building Better, Building Beautiful Commission (MHCLG, 2020)
- Self-build and Custom Housebuilding Act 2015
- Planning Practice Guidance (MHCLG, 2015, 2016, 2017, 2018, 2019)
- White Paper: Fixing our broken housing market (MHCLG, 2017)
- 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 2018 – 2022 (2018)
- 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)
- Objective Assessment of Crawley's Housing and Employment Needs (Chilmark Consulting, 2015)
- Homelessness Strategy 2014-2019 (CBC, 2014)
- The Strategic Housing Land Availability Assessment (CBC, 2019)
- Lessons from Higher Density Development (GLA, 2016)
- At Crawley Study (GL Hearn, 2009)
- Gypsy and Traveller Accommodation Needs Assessment (GTAA) (CBC, 2014)
- Housing Trajectory (CBC, 2020)
- 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 2019 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, notably the COVID-19 pandemic, and economic uncertainty associated with the departure of the UK from the European Union, are weighing on development activity. 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 will be considered as part of an 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 505 dwellings per annum over 2015-19, & delivery of 404 units net in 2019/20, compared with Local Plan target of 340d.p.a	Fluctuating widely between appx 340 and 600dpa.	CBC Authority Monitoring Reports 2015-2019. Housing Trajectory Base Date 30 June 2020; West Sussex County Council Monitoring Information 2019/20.
C2	Trajectory comprising: a) Net additional dwellings – in previous years b) Net additional dwellings – for 2019/20 c) Net additional dwellings – in future years Managed delivery target	a) 2,422 net delivered over 2015-20 b) predicted 740 (net) in 2020/21 c) 5,316 projected over 2021-37	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 2019-base Housing Trajectory; CBC submission 2021 Local Plan Housing Trajectory; CBC Authority Monitoring Reports 2015-2019 CBC/WSCC Monitoring information 2019/20.
C3	Net additional pitches (Gypsy and Traveller)	Nil	The Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (CBC, 2014) identified a potential future need for up to ten pitches within Crawley.	CBC Authority Monitoring Reports 2015-2019
C4	Gross affordable housing completions	Gross delivery of 746 over period 2015-2020, amounting to 30% of total supply and 46% of supply on sites with planning permission	Delivery of affordable housing has accelerated over the period 2015-20, achieving within that period the implied average requirement of 136dpa (i.e. 40% of 340dpa).	CBC Authority Monitoring Reports 2015-2019 CBC/WSCC Monitoring information 2019/20

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

- C6 The 2011 Census indicates that the population of Crawley has risen significantly over recent decades, increasing by 30% from 82,000 in 1981 to 106,597 in 2011, and reaching an estimated 113,500 in 2020. 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 43% from 30,000 in 1981 to 43,000 in 2011. This increase is greater than the growth in population over a similar period. Average household sizes have declined from 2.74 in 1981 to 2.48 in 2011. This is consistent with national trends, which have seen shifts in household composition towards smaller household sizes. The change in the number of households between 1981 and 2009 equated to an average of 482 per annum. The latest household estimates (June 2020) project a figure of 279 per annum for the period 2021 to 2037 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 2015-19, out of 570 gross affordable housing units completed the breakdown was: - 1-bed 180 (32%); - 2-bed 295 (52%); - 3-bed 93 (16%); - 4-bed 2 (3%)	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 2015-19

Indicator No.	Indicator	Crawley Data	Trend	Data Sources
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 2015-19 out of 1464 gross housing units completed the breakdown was: - 1-bed 572 (39%) - 2-bed 542 (37%) - 3-bed 236 (16%) - 4+-bed 114 (8%)	Tendency towards under-delivery of larger unit sizes	CBC Authority Monitoring Reports 2015-19

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 consultation draft 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 will be undertaken as part of an updated Strategic Housing Market Assessment which has been commissioned by the council.

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	2018: Lower Quartile Ratio – 10.70 2018: Median Ratio – 9.11	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)

Issue: Land supply in the borough is limited

C15 As Crawley’s administrative boundary is tightly drawn around the Built-Up Area Boundary (BUAB), there is a limited supply of undeveloped and unconstrained land in the borough. Understandably, this has strong implications for meeting housing need and aspirations. Recent developments have tended to be flatted one and two bed schemes, because of the types of housing sites that are available in the town. The building of family and aspirational homes, whilst meeting the numerical requirements of the borough, will be dependent upon ensuring the efficient use of land. With the 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

C16 Without an updated Local Plan, the council would not be able to demonstrate a five-year housing supply in the longer term, even with the development of Forge Wood. Whilst limited windfall sites may continue to come forward, the strategic and proactive management of housing delivery may be weak.

What the Local Plan can and cannot do

C17 The identification and timely release of land is not entirely within the council's control because of land ownership issues. Furthermore, there is growing pressure/reliance on delivery of housing to address Crawley's unmet objectively assessed housing needs within the wider Housing Market Area, outside of authority boundary because of the constrained land supply in Crawley. The Local Plan can attempt to maximise the availability of land within Crawley, of the correct type, and in suitable locations to meet some of its identified housing need.

Indicator No.	Indicator	Crawley Data	Trend	Data Sources
C9	Supply of ready to develop housing sites (5-year housing land supply)	5-year housing land supply (1 April 2020 to 31 March 2025) = 2,145	The 5-year housing land supply has tended to be strong in the past few years.	CBC Housing Trajectory – 1 September 2020
C10	New and converted dwellings – on previously developed land (PDL)	2015-2019: 68% 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	2018/19 All sites – 55.3 dwellings/ha 10+ units sites – 61.0 dwellings/ha Up to 9 unit sites – 33.9 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 where possible. 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 However, the available business land supply pipeline is highly constrained, presenting challenges in providing the business-led employment floorspace that is needed to support job growth over the Plan period. Further, the economic impacts of the Covid-19 pandemic have been particularly felt in Crawley given the significant economic contribution of Gatwick Airport and aviation related sectors. It is also recognised that Crawley's economic benefits do not necessarily spread throughout the local 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, 2019)
- Planning Practice Guidance (MHCLG, 2014, 2018)
- Aviation Policy Framework (DfT 2013)
- 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)
- Crawley Economic Development Strategy (Lichfields, anticipated Winter 2020)
- Crawley Town Investment Plan (2020)
- Employment Land Availability Assessment (Base Date 1 September, January 2021)
- Employment Land Trajectory (Base Date 1 September 2020, January 2021)
- Employment Land Trajectories 2015 – 2030 (AMR 2018 refers)
- Retail, Commercial, Leisure and Town Centre Needs Assessment (2020)
- 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 (updated March 2018)

- Crawley Employment and Skills Programme 2019-2024
- 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)
- HOR9 Strategic Employment Site: Economic Assessment Task 1 Supply and Demand Evidence (Chilmark for Reigate and Banstead Borough Council 2017)
- HOR9 Strategic Employment Site: Economic Assessment Task 2 Economic and Market Impact Analysis (Chilmark for Reigate and Banstead Borough Council 2017)

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 in order to sensitivity test its initial findings and have regard to updated economic forecasts.
- D6 For Crawley, the Economic Growth Assessment 2020 (as updated) establishes a range of economic growth forecasts for Crawley. Of these forecasts, the Local Plan employment land requirement is identified based upon the Experian Baseline Job Growth projections, this representing the most appropriate basis for considering future employment land requirements from a labour demand perspective. On this basis, there is need for a minimum 38.7 hectares new employment land to accommodate business needs in Crawley Borough over the Plan period to 2036. The identified need is significantly within the industrial sectors (32.8ha), with office needs accounting for 5.9ha of the total. Crawley’s Employment Land Trajectory (September 2020) identifies an available employment land supply pipeline of 17.6ha, which comprises 8.8ha office land and 8.7ha industrial land. This means that there is a sufficient employment land supply pipeline to meet office needs, but there remains outstanding need for a minimum 24ha new industrial land that must be planned for.

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. The economic implications of the Covid-19 pandemic have been particularly felt in Crawley, though 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. Through the Local Plan, steps can be taken to plan positively for economic recovery and growth, planning to accommodate identified business-led economic needs 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, is undermined. Without policies that support economic growth, particularly as the borough’s economy seeks to respond to economic challenges, there is risk that main employment areas could be undermined, placing at further risk the provision of a sufficient land supply to support Crawley’s economic growth. Such a scenario will present challenges to investment and growth in Crawley, increasing risk that some businesses could be displaced elsewhere, and potentially outside the sub-region entirely.

What the Local Plan can and cannot do

- D9 The Regulation 18 and initial consultation on the Regulation 19 Local Plan identified a 523ha Area of Search as the preferred destination for a Strategic Employment Location capable of accommodating Crawley’s unmet business land needs, should safeguarding be lifted. However, the draft national Aviation Strategy, Aviation 2050, which was published in December 2018, after the Airports National Policy Statement supporting expansion at Heathrow, states that it is still prudent to continue with a safeguarding policy at other airports. This document has not yet been progressed further. There is not, therefore, any certainty in government policy that land at Gatwick is no longer required to be safeguarded.
- D10 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.
- D11 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.
- D12 The exception to this is the land at Gatwick Green, 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, particularly given the distance of this land further away from the terminals than other on-airport locations. 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 land area that would be required to accommodate a southern runway. Therefore, the Local Plan supports the allocation of a new industrial/warehouse-led Strategic Employment Site at Gatwick Green.
- D13 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 and allocations, Crawley is able to meet its identified office needs over the forthcoming Plan period to 2037.

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 2015-2019	<p>Gross B-class delivery (excluding ‘churn’) as a percentage of projected delivery rate (from EGA) <u>2015/16</u></p> <p>Gross delivery exc; churn (sqm) Office:12,062 Industrial: 8,872 Total: 20,934</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</p>	Recent years have seen Crawley exceed it projected gross B-class floorspace delivery. For the four most recent monitoring years this has included significant office floorspace delivery (56,758sqm) and industrial	<p>Crawley Authority Monitoring Reports 2015-19.</p> <p>WSSC HEDNA data.</p>

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>	(42,271sqm).	
D2	Comparison of actual and projected losses of Class E Office, B2/B8 Industrial and Storage &	<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>	Significant PDR losses to residential have initially informed a higher than anticipated % of losses versus	<p>Crawley Authority Monitoring Reports 2015-19.</p> <p>WSCC HEDNA data.</p>

Indicator No.	Indicator	Crawley Data	Trend	Data Sources
	Distribution employment floorspace to non-employment uses 2015-2019	<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><u>2017/18</u> Completed losses to non B-uses (sqm) Office: 2,353 Industrial: 3,180 Total: 5,715</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: 53% Industrial: 78% Total: 64%</p> <p><u>2018/19</u> Completed losses to non B-uses (sqm) Office: 573 Industrial: 0 Total: 573</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: 12% Industrial: 0% Total: 6%</p>	projected losses. 2017/18 saw a reversal of this trend, possibly a result of Article 4 Directions, which has continued in 2018/19.	CBC PDR monitoring.
D3	Comparison of net employment floorspace	<p><u>2015/16</u> Net delivery (sqm) Office: -4,813 Industrial: 6,879 Total: 2,066</p>	Taking losses into account, net delivery of employment space	Crawley Authority Monitoring Reports 2015-19.

Indicator No.	Indicator	Crawley Data	Trend	Data Sources
	delivery with 'baseline' scenario projected requirement	<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: Office: 160% Industrial: 275% Total: 225%</p>	<p>over the period 2015-19 has reached 115% of the identified baseline requirement, with the office and industrial categories achieving 105% and 123% of their respective requirements.</p>	<p>WSSC HEDNA data.</p> <p>CBC PDR monitoring.</p>

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

D14 Qualitative feedback from business organisations and land agents, in addition to evidence set out in the 2020 EGA, suggests that there is 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 less modern 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 recognises that the lack of quality office provision is a key challenge facing the functional economic market area, and finds that Crawley is well placed to help meet this qualitative need, provided the right quality of office space can be provided.

Likely evolution without the continued implementation of the Local Plan

- D15 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.
- D16 Further, 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.
- D17 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

- D18 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.
- D19 However, the EGA identifies a significant quantitative need for industrial floorspace, and a smaller quantitative need for office floorspace. 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.
- D20 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 2015-18	<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	There was some movement of floorspace between office and industrial uses during the four-year period. The implications do not seem particularly dramatic for the balance between office and industrial floorspace, with only a	Crawley Authority Monitoring Reports 2015-19. WSCC HEDNA data.

Indicator No.	Indicator	Crawley Data	Trend	Data Sources
		<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	slight cumulative trend away from the latter towards the former being apparent.	
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	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 has seen 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 three preceding years.	Crawley Authority Monitoring Reports 2015-19. 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.

- D21 Crawley is well established as a key employment destination in the Gatwick Diamond, and is home to over 3,400 active businesses which generate 95,000 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.
- D22 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%).
- D23 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.

D24 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 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

D25 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. There is however 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

D26 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)	SE = 10.5% United Kingdom = 14.8% (ONS 2018/19 EGA 2020)	2019/20 is the first year this Indicator will be monitored.	EGA 2020
D7	Working age population qualified to at least NVQ Level 4 or higher	21.5% (2011 Census) 26.9% (EGA 2014)	SE = 29.9% England = 27.4% (2011 Census) SE = 36.8%	Crawley still has the lowest percentage of the population with at least a NVQ Level 4 qualification within West Sussex, which is below	Census 2011 EGA 2014 EGA 2020

		33.2% (ONS 2018/19 EGA 2020)	Great Britain = 34.4% (EGA 2014) SE = 41.4% United Kingdom = 38.4% (EGA 2020)	both the South East and national figure	ONS
D8	Completed loss of employment (Class E2//C1/D2/Sui Generis) floorspace (sqm) in main employment areas to residential use via planning permission ¹⁴ .	2018/19 E =77.8 C1 = 0 D2 = 0 Sui Generis = 0	N/A	First year this Indicator has been monitored.	Crawley Authority Monitoring Report WSCC HEDNA Data

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

- D27** 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.
- D28** 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 of the COVID-19 pandemic become clearer, and with a growing trend towards e-retailing putting many town centre shops under pressure, it is vital that the Town Centre is able to adapt and respond to change.
- D29** The Crawley Retail, Commercial Leisure and Town Centre Neighbourhood Needs Study 2020 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.
- D30** 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

¹⁴ Following changes to the Use Class Order that came into effect 1 September 2020, future monitoring will be assessed against Class E floorspace lost to residential.

its residential population and the Local Plan recognises the Town Centre as a sustainable place for people to live.

- D31 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 1,150 people. It is anticipated that, over the Plan period to 2037, a further 2,200 dwellings will come forward in the Town Centre, bringing the total to just over 3,000 residential units.
- D32 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

- D33 Town centres are facing unprecedented challenges, and policy flexibility is need 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.
- D34 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.
- D35 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

- D36 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.

- D37 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.
- D38 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.
- D39 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.

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
D9	Number of residential dwellings built in the Town Centre	2018/19 = 45 units	N/A	First year this Indicator has been monitored.	Crawley Authority Monitoring Report WSSC HEDNA data
D10	Vacancy rate for ground floor units in Primary Shopping Area	Jan 2020 = 9.6%	South East Jan 2020 = 9.7% UK Jan 2020 = 9.8%	First year this Indicator has been monitored.	Crawley Authority Monitoring Report Springboard vacancy rate data
D11	Completed Town Centre Neighbourhood Facilities by sqm floorspace.			First year this Indicator will be monitored	Crawley Authority Monitoring Report WSSC 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 Bill 2019-21 are current national and county plans that are encouraging a movement towards a net gain in biodiversity and natural capital. 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 Biodiversity Metric 2.0 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.
- 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 10% net gain requirement is expected on site for new developments.

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, 2019)
- Planning Practice Guidance (MHCLG, 2016)
- EU Habitats Directive 99/43/EEC (1992)
- The Natural Choice: securing the value of nature (DEFRA, June 2011)
- Natural Environment and Rural Communities Act 2006
- Waste Framework Directive (2012)
- State of the Environment 2007, South East England (Environment Agency)
- Green Infrastructure SPD (CBC, 2016)

Landscape/Countryside

- National Planning Policy Framework (MHCLG, 2019)
- Crawley Landscape Character Assessment (CBC, 2012)
- National Design Guide (MHCLG October 2019)
- 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 Study (2013) JPC Strategic Planning and Leisure Limited
- Crawley Playing Pitch Assessment (2013) JPC Strategic Planning and Leisure Limited
- 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) (WSSCC, 2003)
- High Weald AONB Management Plan 2019-2024 (High Weald Joint Advisory Committee, 2019)
- Residential Developments and Trees (Woodland Trust, 2019)

Biodiversity

- National Planning Policy Framework (MHCLG, 2019)
- 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 (WSSCC, 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)

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

- E5 There are no Special Protection Areas (SPAs), Special Areas of Conservation (SACs) or Ramsar sites within the borough. However, the Ashdown Forest SPA and SAC and the Mole Gap to Reigate Escarpment SAC are both within 15 km of the borough's boundary. Therefore, the council has published a Screening Report alongside the SA Scoping Report to establish whether the Local Plan will need to be subject to an Appropriate Assessment. Ashdown Forest SPA and SAC are designated for healthland, great crested newts, nightjars and Dartford warblers. Mole Gap to Reigate Escarpment SAC is designated for its box scrub, grasslands, woodlands, heaths, great crested newts and Bechstein's bats. Additional development in Crawley can reasonably be expected to result in an increase in numbers of people visiting these sites, and travelling through them. It is not expected that this impact will be significant. However, the HRA Screening Report recommends further work to be undertaken in relation to assessing the 'in combination' effects arising from the Plan when added to the other Plan in the area.
- E6 The borough has designated 12 Local Wildlife Sites (LWS), formerly known as Sites of Nature Conservation Importance (SNCIs), covering 329.79 hectares in total. Eight sites are owned by the borough council, while four are in private ownership and management. 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 478.56 ha (10.64%), Ghyll woodland 25.49 ha (0.57%), lowland heathland 0.83 ha (0.02%), traditional orchard 0.32 ha (0.01%) and wood-pasture & parkland covers 41.74 ha (0.93%).
- E7 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 193.5 hectares

of Ancient Woodland within the borough and a significant number of large environmentally valuable trees scattered throughout the town that are under increasing pressure from development and the availability of funds for maintenance. The loss of these features would alter the character and appearance of the town.

- E8 When designated as a New Town, Crawley was planned with significant amounts of green spaces within the built up area to provide an attractive layout and to help distinguish between the different neighbourhoods. The 2008 Planning Policy Guidance 17 (PPG17): Open Space, Sport and Recreational Assessment identified significant amounts of valuable green spaces within the town. At that time, there were 32 areas of open space such as parks and nature conservation areas including 26 Playing fields; more than 70 children's play areas and 19 Allotment sites. 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 has been undertaken (2020) to reassess the borough's open space needs and provision.
- E9 There is currently 1.76 ha of park and garden space 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.
- E10 These spaces have a multi-functional role: being fundamentally important to the structure of the town; providing recreation space; playing an ecological role for the movement of wildlife; mitigating the impact of climate change; and helping to alleviate the risk of flooding. 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.
- E11 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.
- E12 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

- E13 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.
- E14 Furthermore, national policy, planning and environmental policy, has evolved since the Local Plan was adopted. Government policies on Biodiversity Net Gain 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

- E15 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.
- E16 However, through the introduction of a mandatory requirement to secure net gain, the government are consulting on opportunities for securing financial contributions, where on-site mitigation and compensation is insufficient to deliver the full net gain for biodiversity required for the site. This may begin to provide greater funding opportunities to be directed towards agreed improvements across the Green Infrastructure network.
- E17 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.
- E18 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.
- E19 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 Metric 2.0.
- E20 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	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

Indicator No.	Indicator	Crawley Data	Data Sources
E2	Amount of trees with Tree Preservation Orders lost per annum	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; CBC Authority 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.	CBC Authority 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.	CBC Authority 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	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	Sussex Biodiversity Record Centre
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.	CBC Authority Monitoring Report
E8	Number of Management plans renewed in a five year cycle	Not currently monitored. However, future data will serve as baseline.	CBC Authority Monitoring Report

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

- E21 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.
- E22 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').
- E23 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.

E24 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

E25 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

E26 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	Total area of open space and natural habitats = 500 hectares (12.9%). No direct loss of sites designated for their biodiversity importance. 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.	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 8 are actively managed by the borough council. The 4 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, 2019)

Infrastructure

- National Planning Policy Framework (MHCLG, 2019)
- 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, 2014)
- Crawley Draft Infrastructure Plan (CBC, 2019)
- Thames river basin district river basin management plan (DEFRA, 2018)
- South East river basin district river basin management plan (DEFRA, 2018)
- 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)
- Gatwick Sub-Region Water Cycle Study (Entec UK Ltd, 2011) and 2013 update

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)

- 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)
- Transport Modelling (Stantec, 2020)
- 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 Draft Local Cycling and Walking Infrastructure Plan (CBC, 2020)
- 'New Directions for Crawley': Crawley Draft Transport Strategy (CBC, 2020)
- Crawley Growth Programme
- Rail Utilisation Strategies – London and the South East (Network Rail, 2011)
- West Sussex Local Transport Plan (LTP3) 2011 – 2026 (WSSCC, 2011)
- National Travel Survey 2017
- Emerging Transport Strategy for the South East (TfSE, ongoing)
- 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)
- April 2019 Legal Agreement between CBC, WSSCC and the airport operator
- Gatwick Airport Master Plan (Gatwick Airport Limited, July 2019)
- Gatwick Airport Surface Access Strategy (Gatwick Airport Limited, May 2018)
- Gatwick Airport Interim Parking Strategy (Gatwick Airport Limited, February 2017) Your Journey to Work: Staff Travel Plan 2013-2030 (Gatwick Airport Limited)
- Control of Development in Airport Public Safety Zones (Circular 01/2010)
- Revised Public Safety Zones at Gatwick Airport (CAA, 2011)
- 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. However, with further development planned through the Local Plan to 2037, significant growth at Gatwick Airport, and major development being promoted to the west of Crawley, it is possible that a new Western Link Road 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% Dedicated school bus – 2.5% Train – 0.1% Taxi – 0.6% Walk – 59.4%	(2008/09) WSCC 5-10 Years: Car- 35.6% Car Share – 6.3% Public transport – 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%	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 More up to date information being sourced.

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
F3	Number of people killed or seriously injured in road traffic accidents per 100,000	2011-13: 34.5 2012-14: 38.2 2013-15: 38.8 2014-16: 42.1 2016-18: 44.8		There has been a slight upward trend in Crawley. There have been an average of approximately 0.4 KSI per 1000 of the population over recent years	Public Health England Local Authority Health Profiles
F4	Change in number of publicly available Electric Vehicle Charging Points within the borough.	Not currently monitored. However, future data will serve as baseline.			CBC Authority Monitoring Report
F5	Per capita and CO ₂ emissions from transport (also see Objective 1);	2018: 2.21 tonnes	2018 South East: 2.15 tonnes	Transport emissions have remained fairly stable over time as other areas have reduced.	UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2018, BEIS, 2020

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 70mppa. This would, it is anticipated, 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 2019 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 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 SA/SEA.
- 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 2022, 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 public transport mode share for passengers of 44% (39% by rail).
- 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, whilst still supporting the public transport target. 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, possibly also with the use of the standby northern 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.

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 there could be greater demand for development at the airport and the management of its environmental impact would be more limited.

What the Local Plan can and cannot do

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)	<u>2013:</u> 34.9m (42.6%) <u>2014:</u> 37.9m (41.4%) <u>2015:</u> 39.6m (44.4%) <u>2016:</u> 42.1m (42.6%) <u>2017:</u> 44.8m (43.9%) <u>2018:</u> 45.6m (44.3%)		Passenger numbers are predicted to increase to exceed 45 million passengers per annum from 2018. The percentage of international air passengers at Gatwick has grown faster than that for domestic passengers. SAAP target for 40% public transport access has been exceeded in recent years.	CBC

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 Infrastructure and S106 Agreements SPD, it would not be able to provide for specific items of infrastructure needed in certain locations.

What the Local Plan can and cannot do

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.). 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 150% of annualised projections for 2015-19 as of April 2019 - Rate of commercial growth stands at 115% of annualised projections for 2015-19 as of April 2019 	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.	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 113,500. 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 1950's are now growing older and, although they do not represent the majority in terms of population structure, their needs are perhaps greater. Even across the young adult population there are variations in the types of people living in the town with a mix of young families, singles who have moved into the area looking for executive style living, and those who have lived in the area for some time, who perhaps do not have the means to buy their own home and are dependent on the state for support.
- 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, 2019)
- Reuniting Health with Planning – Healthier Homes, Healthier Communities (TCPA, 2012)
- Gatwick Diamond Local Strategic Statement (Chilmark Consulting, 2017)
- Infrastructure Delivery Plan (CBC, 2014)

Health:

- Start Well, Live Well, Age Well: West Sussex Joint Health and Wellbeing Strategy 2019 – 2024 (WSCC, 2019)
- West Sussex Joint Strategic Needs Assessment (WSCC, 2018)
- West Sussex Joint Strategic Needs Assessment “People and Places” for Crawley (WSCC, 2019)
- Crawley Open Space Study (2013) JPC Strategic Planning and Leisure Limited
- Crawley Playing Pitch Assessment (2013) JPC Strategic Planning and Leisure Limited
- Noise Annex: Local Plan (CBC, 2015)

Education

- Planning School Places 2019 (WSCC, 2019)

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 2011 estimated the population of Crawley as 106,597 and has since increased to approximately 113,500 residents. This trend is expected to continue and as supported by the Strategic Housing Market Assessment, the need for increased housing delivery in terms of total provision and to meet type and tenure demand will increase. The challenge will be to try to meet the needs of the currently young population (the largest age group being between 30

and 44) whilst providing more assisted living and 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 2011 Census indicates that 20% of the resident population is under 15 years of age (compared to 17.7% for England), 61.6% is between 15 and 59 (compared to 59.5% in England and Wales) and 18.4% is aged 60 and over (compared to 22.8% in England and Wales). This shows that Crawley has a population profile broadly in line with the national average with a slightly above average working age population.
- 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.

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
G1	Satisfaction of people over 65 with their home	76.1% (2008-09)	SE - 85.5% England 83.9% (2008-09)	Whilst the percentage is lower than the regional and national result it does represent a significant increase from the 53% result of the 2006/07 People in Pound Hill South and Three Bridges were more inclined to express satisfaction with their home while those living in Northgate and Bewbush expressed greater levels of dissatisfaction. Younger people were also more inclined to be dissatisfied with their home.	Former 138 2008/09 Place Survey NI More up to date information being sourced.
G2	Percentage who think that older people in their local area get the help and support they need to continue to live at home for as long as they want to	29.7%	SE 28.4% England 30%	People in Three Bridges were more likely to agree with this question while those living in Broadfield South were more likely to disagree. People renting their home from the council were more positive about the support older people receive than those renting their home from a private landlord or those buying their property using a mortgage.	Former 139 2008/09 Place Survey NI More up to date information being sourced.
G3	Overall satisfaction with local area	74.9%	England 78.16%	Significant increase from the 06/07 result of 53% People living in Maidenbower, Southgate and Three Bridges tended to be more	Former NI 5 2008/09 Place Survey

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
				positive while those living in Bewbush and Broadfield were more inclined to be less satisfied. Younger people were more likely to be less satisfied.	More up to date information being sourced.

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, 2011) has a larger ethnic minority population than the national average and the average for the South East. The largest minority groups are Asian/Asian British: Indians who represent 5.2% of the population of the borough; and Pakistani who represent 4.3%. This is in comparison with 2.6% and 2.1% respectively of the national population. Electoral Roll Data recorded 61 different nationalities from the EU and Commonwealth countries alone also highlighting the enormous diversity in Crawley's population. With a wide ranging ethnic structure in Crawley, there needs to be a variety of community facilities (such as places of worship etc.) and services to meet specific needs and encourage community cohesion.

Likely evolution without the continued implementation of the Local Plan

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 people who believe people from different backgrounds get on well together in their local area – Place Survey/ LAA2	73.1%	West Sussex County – 80% All England – 81.62%	Crawley's figure is slightly lower than the England and West Sussex figures but there is a slight improvement made from the 06/07 figure of 70% There is variance across the town with people from Northgate and Southgate more likely to agree with the statement while those from Broadfield and Bewbush were less likely to agree.	Former NI 1 2008/09 Place Survey More up to date information being sourced.
G5	Percentage of people who feel that they belong to their neighbourhood - Place Survey	53.5%	West Sussex County – 61.7% All England – 63.7%	People living in Tilgate are more likely to feel a sense of belonging to their neighbourhood while those living in Bewbush and Broadfield are more likely to have less attachment.	Former NI 2 200809 Place Survey More up to date information being sourced.

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

G12 Crawley is relatively poorly served with 'early years' provision for under 5s with the lowest proportion of childminding places in the county and the second lowest proportion of places in early education and childcare.

G13 There are 26 primary schools catering for the needs of Crawley's children aged between 4 and 11 years. Crawley also has six secondary schools: Hazelwick, Holy Trinity CE Secondary, Oriel High, Ifield Community College, St Wilfrid's and Thomas Bennett Community College, providing education to children aged between 11 and 16 and to A- Level standard for 16-18 year olds. The Gatwick School also offers primary and secondary education but does not yet have permanent planning permission. 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 at all age groups when compared to the South East averages. In 2008/09 63% of boys and 69% of girls living in Crawley achieved five A*-C grades at GCSE or equivalent. This compares with 66% and 74% respectively in the South East region as a whole. Similarly the attainment rates for those between the ages of 16 and 18 years are up to 7% lower than South East and UK averages, although this gap reduces significantly for those over the age of 19. Compared with the surrounding districts, Crawley has a higher percentage of residents with poor literacy and numeric skills.

Likely evolution without the continued implementation of the Local Plan

G15 The provision of early years and educational facilities is the responsibility of County Council, and will be 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 so 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 Plan review is considering the opportunities for supporting the council's initiatives to improve skills of the Crawley residents.

Indicator No.	Indicator	Crawley Data	South East	England	Data Sources
G6	Participation of 17 year- olds in education or training	3.8% Not in Education, Employment or Training in Crawley (2011)			CBC More up to date information being sourced.
G7	Percentage of people aged 16 – 64 with no qualifications.	2018: 3.0%* 2018: 5.3%* 2017: 5.9%* 2016: 2.0* 2015: 4.9%* 2014: 4.7% 2013: 9.2% 2008: 17.1% *too small to estimate reliably	2018: 5.8% 2018: 5.6% 2017: 5.2% 2016: 5.5% 2015: 6.3% 2014: 5.6% 2013: 6.5%	2019: 7.5% 2018: 7.6% 2017: 7.6% 2016: 7.8% 2015: 8.4% 2014: 8.6% 2013: 9.2%	Annual Population Survey, ONS, via NOMIS More up to date information being sourced.

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 Airport	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%

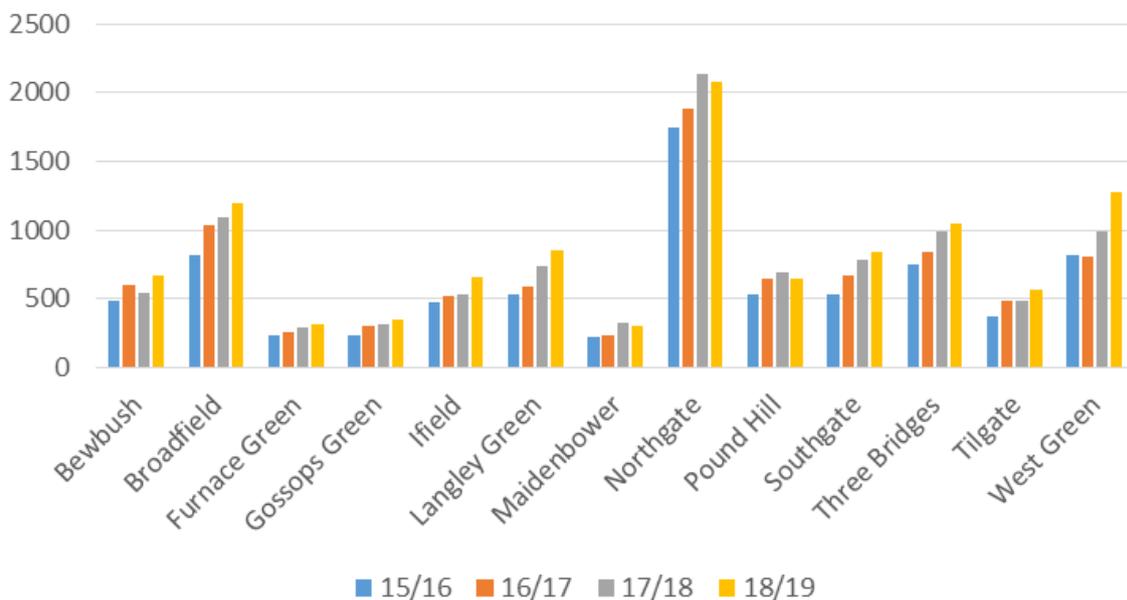
* Vehicle crime includes theft of motor vehicle and theft from a motor vehicle

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 80 years for men and 84 years for women, which is slightly higher than the national average (2008 data). However, there are wide variations between different wards – life expectancy at birth for males in Bewbush is 75.7 years compared to 82.7 years in Pound Hill North. 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	83.5% in good health or better	England Average – 81.4 South East - 83.6 WSSC – 82.5%	Crawley has a higher self- reported measure of people's overall health than England's average.	Census 2011
G11	All-age all- cause mortality rate	2008-09 Females 451 Males 540	England: 2008/09 Females 480 Males 669	Crawley saw a rise in female mortality from 382 in 2007/08 to 451 but a fall in the male mortality from 580 in 2007/08 to 540.	Former NI 120 (a-Females & b-Males)
G12	Healthy life expectancy at age 65 (years)	2011 Females 21.8 Males 18.8	South East 2011 Females 21.6 Males 19.0 England and Wales 2011 Females 21.0 Males 18.4	Crawley's data for health expectancy at 65 is similar to the national average.	2011 Census Office of National Statistics
G13	Adult Participation in Sport	2010-12 – 20.2% 2009-11 – 17.3% 2008-10 – 17.9% 2007-09 – 17.0% 2005/06 – 19.6%	Regional Average 2011-12 – 24.1% 2009-11 – 23.1% 2007-09 – 23.1% 2005/06 – 22.9% National Average – 2009-11 – 22.3% 2007-09 - 22.1% 2005/06 – 21.6%	This represents a slight increase in participation from the result of the first survey carried out in 2005/06 which was 19.6%. Crawley has the average participation rate for West Sussex, but lower than the Regional and National averages.	Former NI 8 Active People Survey by Sport England
G14	Number of Adults Physically Active	2016/17 – 62% active; 24% inactive			West Sussex Joint Strategic Needs Assessment
G15	Percentage of Year 6 children identified to be obese.	2016/17 – 18%			West Sussex Joint Strategic Needs Assessment

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
G16	Participation rate in arts and culture	Not currently monitored. However, future data will serve as baseline.			CBC Authority Monitoring Report

Appendix E: Submission Local Plan Spatial Strategy Options and Appraisal

The Local Plan Review was based on continual monitoring, as published in the Authority's Monitoring Reports. This confirmed that the adopted Local Plan (Crawley 2030) is up-to-date and successful:

1. Less than five years old (adopted December 2015);
2. Maintains a five year land supply for housing (11.3 years supply for 2019-2024);
3. Exceeds the Housing Delivery Test (2019 Housing Delivery Test results for Crawley = 235%);
4. Secures 40% affordable housing on residential developments with planning permission;
5. Success in appeals (108 appeals in total between April 2015 and March 2020; of which 77 (71%) were dismissed and 29 were allowed, and two allowed in part);
6. Progress on town centre development sites (one complete, two under construction; one with planning permission);
7. Adoption of five Supplementary Planning Documents, two Development Briefs and five Conservation Area Statements.

Whilst there is no urgent need to review the Local Plan, the council began the process in August 2018, following the 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. This allowed the council to have the opportunity to work towards updating the Local Plan whilst minimising the risk of adopted policies being considered out-of-date. It also 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 success of the existing Plan.

The Local Development Scheme was reviewed and adopted in November 2020 and updated the timetable for the review of the Local Plan to work towards securing a potential adoption date of March 2022.

The 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.

Option 4 was taken as it was believed this 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 has 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.

Local Plan Review			
Plan Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
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.	<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>Joint working is now a known priority. The Horsham District Planning Framework (HDPF) Inspector's Final Report¹⁵ 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)¹⁶ and as part of their commitment to commence work on a Site Allocations Development Plan Document.</p> <p>Two Strategic Statements are relevant to Crawley borough:</p> <ul style="list-style-type: none"> • The Gatwick Diamond Local Strategic Statement has recently undergone a refresh¹⁷. • 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. <p>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.</p> <p>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.</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 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</p>			

¹⁵ Report on the Examination into Horsham District Planning Framework (8 October 2015) Geoff Salter, The Planning Inspectorate

¹⁶ Mid Sussex District Plan 2014 – 2031, Policies DP4: Housing and DP5: Planning to Meet Future Housing Need (March 2018) MSDC

¹⁷ 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>

	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.		
Option 2: Retaining Existing Spatial Strategy and undertaking Partial Review of specific policies and 'Saving' some existing 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>/</p> <p>/</p> <p>-</p> <p>+</p> <p>+</p> <p>-</p> <p>+</p> <p>-</p> <p>-</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>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>		
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.	<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 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</p>		

	<p>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>		
Option 4: Comprehensive Review of the adopted Local Plan, maintaining overall strategic approach, including 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 of individual policies; and considering new policies to introduce.	<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>As with Option 3.</p> <p>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.</p> <p>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>		
Option 5: Starting from a blank page and creating a new strategic spatial strategy and a completely new full sets of 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>?</p> <p>?</p> <p>-</p> <p>--?</p> <p>--?</p> <p>--?</p> <p>?</p> <p>?</p> <p>?</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. 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.</p> <p>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>		
Option 6: Do not update the Local Plan and publish the review confirming the Plan is in conformity with national 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>?</p> <p>?</p> <p>-</p> <p>--?</p> <p>--?</p> <p>--?</p> <p>?</p> <p>?</p> <p>?</p>	

Commentary

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.

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.

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..

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.

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.

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 urban extensions and the safeguarding of an area of search for a potential western link road, where this runs through Crawley.

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.

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

Spatial Strategy and Vision			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
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.	<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 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 which would be lost/reduced substantially by significant development levels (Criteria 2).</p> <p>Maximising development opportunities within, and adjacent to, the borough to the level required to meet all employment and housing needs arising would require high densities which may not be sympathetic to the lower-rise character of Crawley's neighbourhoods and unrestricted additional developments on the edge of the built-up area would undermine the 'town in a countryside setting' as envisaged by the original new town masterplan (Criteria 3).</p> <p>Meeting Crawley's objectively assessed housing need would provide sufficient affordable housing within close proximity to the town to meet the council's reasonable preference waiting list (Criteria 4).</p> <p>Providing sufficient land for meeting the projected employment needs would allow for the continuing of the town's strong regional economic position and its growth, in terms of both quantity and quality, in line with the indications of the business community's preference (Criteria 5).</p> <p>Many of the remaining undeveloped sites within the borough provide important roles for biodiversity and landscape (Criteria 6).</p> <p>Further developments within the built environment will provide greater pressures on existing infrastructure, whilst new substantial, well-planned urban extensions adjacent to Crawley would provide new infrastructure to meet the needs of the development (Criteria 8).</p> <p>The impact on sustainable communities is uncertain. 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).</p>			

<p>Scenario 2: A sub regional 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>++? ++? +? ++? +? ++ ++? ++? +</p>	
<p>Commentary</p> <p>Careful planning and ensuring developments constitute sustainable development will allow for positive impacts for Criteria 1, 2, 3, 6, 7, 8 and 9. 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.</p> <p>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.</p> <p>Therefore, it is felt that to ensure Crawley is responsibly planning for the growth from the existing population and businesses it should be maximising the development potential within the borough's administrative boundaries as far as is possible and consistent with the principles of sustainable development, through considering a combination with the approach under Scenario 3.</p> <p>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 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>++ -? +? ++ ++? --? ++ ++ ?</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>			

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).

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. 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).

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.

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.

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 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 F: 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 with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 2: Create an overarching policy which clearly defines sustainable development in a Crawley context. Option 2 has been chosen		
Option 1: Rely on the NPPF.	<ol style="list-style-type: none"> 1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities 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: Create an overarching policy which clearly defines sustainable development in a Crawley context.	<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 	++ ++ ++ + + ++ ++ ++ ++	
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 with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
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 with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>Option 1: Develop a local plan policy to protect and enhance the character of Crawley's neighbourhood structure.</p> <p>Option 1 has been chosen because it is considered that by applying a holistic approach to maintaining the character of the neighbourhoods, this option best enables the protection of the key individual features that contribute to the overall function, 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>+</p> <p>+</p> <p>++</p> <p>++</p> <p>+</p> <p>+</p> <p>++</p> <p>++</p> <p>++</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 Reg. 18 consultation illustrates the value in which it is held locally. The benefits of the neighbourhood principle do not however relate solely to character, and in providing accessible housing, employment, infrastructure, facilities and services to support the day-to-day needs of residents, the neighbourhood principle reflects the key indicators of sustainable development. In this regard, Option 1 scores strongly against each of the sustainability indicators, and is brought forward as the preferred approach.</p>			
Option 2: Rely on existing national guidance and other local plan policies to ensure that development respects Crawley's neighbourhood character.	<ol style="list-style-type: none"> 1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities 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 Option 2 approach would rely on existing national guidance and other Local Plan policies to ensure that development respects Crawley's neighbourhood character. 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 with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
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 being 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 & 7).</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, thus promoting the overarching objective of sustainable compact development which complements and enhance the character of local neighbourhoods and encourage further investment into the town.</p>			

<p>Option 2: Delete the existing policy and rely on the NPPF.</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>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. Nor 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 frequently result in approvals for poor forms of higher density applications. Generating 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. 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. Crucially, compact development form needs to be carefully stitched and moulded into its existing surroundings.</p>			
<p>Option 3: Significantly simplify the existing policy and replace with one far less prescriptive.</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>	

Commentary

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. And all this is before we consider that intensification/densification needs to occur within, between and alongside existing urban settings and within existing neighbourhoods, which in turn requires careful planning in regard to new movement patterns and the complex work required concerning existing character, setting and heritage.

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. basic professional involvement cheap

Should the detailed policy text 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. Key documents carefully drafted to aid compact development, such as the National Design guide and the Urban Design Compendium. Furthermore, higher density proposals are more likely to come forward which do not take proper consideration of existing character and sustainable movement principles, nor with 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 are constructed (e.g. low density high rise) may be repeated. And find us once again producing: (a) places 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 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 with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
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). 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. Which follow desire lines and go to where people need and wish to go.</p>		
Option 1: Develop a Local Plan policy to help ensure that	1. Minimise climate change	++	
	2. Adapt to climate change	++	

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 dictate to the new proposals for compact development in the first instance.	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>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. 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 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.	1. Minimise climate change	+?	
	2. Adapt to climate change	0?	
	3. Protect/enhance built environment	-	
	4. Decent, affordable homes	0	
	5. Maintain/support employment	0	
	6. Conserve/enhance biodiversity and landscape	-	
	7. Promote sustainable journeys	--	
	8. Provide sufficient infrastructure	-	
	9. Promote sustainable communities and Encourage active lifestyles	?	
<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 the wider context, and sustainable transport, is unrealistic. 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 with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>Option 1: A policy will be created in the Local Plan that will pay particular 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.</p> <p>Option 1 has been chosen as the incremental development of the land could preclude the potential phasing of more comprehensive, compact development. Also, major new proposals need to be carefully guided and masterplanned to ensure that they appropriately, sensitively and confidently achieve higher, more sustainable density ranges (SA Objectives 1, 2 and 7). Greater clarity, practical advice and local knowledge is needed to identify locations for higher density. Major new development needs to be steered to locations in the borough where sustainable, high capacity, high frequency, segregated transport infrastructure already exists (or is likely to come forward in the future). Increased levels of development, intensified in such locations will help fund the cost of sustainable public transport (SA Objective 8), in order to support the commercial viability of such infrastructure.</p>		
Option 1: A policy will be created in the Local Plan that will pay particular 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.	<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>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 and residential amenity). This policy should help promote the intensification of existing urban environments. 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). 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 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 (SA Objectives 4, 5 and 8).</p>			
Option 2: Delete policy and rely on the NPPF.	<ol style="list-style-type: none"> 1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable 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>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. Without compact development, high capacity sustainable</p>			

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.

Policy CL5: Development Briefs and Masterplanning			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 1: Create a new policy within the Local Plan that requires applications of significance to be prepared against development briefs and masterplans. 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 3, 4, 6 and 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 For large applications to be sustainable (to make efficient use of land, achieve sustainable movement and more compact forms of development) the design development process, pre-submission stage needs to consider an array of factors and interrelated detail. In order to secure and win support for sustainable compact form across the town, careful project brief development and the design development process and design quality and presentations, in particular need to outline the challenges of the project brief and the site and the concept approach to the issues outlined in Strategic Policy CL2. Masterplanning is essential. The design review process can also help ensure the best possible outcomes are being considered. In addition to understanding and responding to the existing character of a host area, Issues such as building height, block size and building typology all affect the existing character and the perception of proposed increases in density for new development. Yet these are vital design aspects frequently overlooked by applicants in their planning application submissions. 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 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 style="text-align: center;">- - - + 0 - - - -</p>	
<p>Commentary 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 CBC Local Plan Policies CL1 – CL4) 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</p>			

out the rational and decision making process's 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.

Policy CL6: Structural Landscaping			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
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.	<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>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 landscaping or the creation of new areas would also have a significant positive impact. The policy should also encourage walking, socially sustainable communities and active lifestyles (SA Objectives 7, 9 and 10). Option 1 could also reduce development potential by highlighting the negative impacts of over-development or development that would not protect or enhance the borough (SA Objectives 4, 5 and 8).</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>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 Views			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<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. Option 1 has been chosen, since it is believed that not managing the important views (Option 2) could lead to incremental development that could erode the important views fundamentally (SA Objective 3 and 6). In addition, soft landscaping 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.	<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>There are views in the borough that are worthy of protection and enhancement. A number of views include significant tree cover or the potential for the view to be enhanced by additional trees, which could reduce the impact on the climate and help the area adapt to the effects of climate change (SA Objective 1 and 2). This proposed policy option would protect and enhance the built environment and key landscape features, and moreover, could have a significant positive impact on sustainability (SA objectives 3 and 6). This option could have a negative impact on development potential (SA objectives 4 and 5), but an attractive environment can attract further investment and create an attractive place in which to live.</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>+</p>	
<p>Commentary</p> <p>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.</p>			

Policy CL8: Development outside the Built-Up Area			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>Option 1: Retain a local policy to maintain Crawley's compact nature and attractive setting whilst conserving and enhancing the countryside.</p> <p>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.</p> <p>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</p>		

	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.	<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>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.</p>			
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>+ / + / / / + / -</p>	
<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.</p>			

Policy CL9: High Weald Area of Outstanding Natural Beauty			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>Option 1: Have regard to the AONB Management Plan when considering proposals in the AONB. Having regard to the AONB designation and the AONB Management plan is the most suitable option as AONB land is highly valued for its contribution to the landscape.</p>		
Option 1: Have regard to the AONB Management Plan when considering proposals in the AONB.	<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>Commentary Respecting the high value landscape of the wider AONB is of benefit to residents of Crawley and those who live and work in the AONB. 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 AONB Management Plan 2019-2024 benefiting SA objectives 3, 6 and 9.</p>			
Option 2: Not recognising the AONB Management Plan and	<ol style="list-style-type: none"> 1. Minimise climate change 2. Adapt to climate change 	<p>- -</p>	

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

Design & Development Requirements

Policy DD1: Normal Requirements of All New Development			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>Option 1: 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.	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 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.			
Option 2: Delete policy and rely on 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 NPPF does not contain detailed development management policies suitable to consider all levels of planning application against.			

Policy DD2: Inclusive Design			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 1: Option 1 has been chosen		
Option 1: To develop a separate policy requiring accessibility standards for all new 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 9. Promote sustainable communities and Encourage active lifestyles	0 0 +? ++ +? 0 +? / ++	
Commentary			
<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.</p> <p>The requirement for accessibility measures may incur costs associated with design and additional space requirements. However, this should be 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 adaption 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	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			
Whilst the potential sustainability benefits of this approach remain positive, the			

	<p>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>0 0 / +? +? 0 0 0 0 +?</p>	
	<p>Commentary 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 0 / +? / 0 0 0 0 +?</p>	
	<p>Commentary 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 0 / - - 0 0 0 0 --</p>	
	<p>Commentary 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 with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
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. As well as to encourage unit layout design 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 8. Provide sufficient infrastructure 9. Promote 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>+</p>	
<p>Commentary</p> <p>The inclusion of external and internal space standards in the Local Plan policy allows for greater level of consistency of application of policy. Adequate outdoor space allows for sufficient outdoor drying space, reducing pressures on electrical usage, and increases natural surface water infiltration, evaporation or harvesting, therefore reducing runoff. There is also the potential to conserve and enhance biodiversity and landscape when these are taken into account during the design and layout of a development scheme. Suitable homes with sufficient space and the potential for adaptation are likely to be more sustainable over the life of the dwelling. Minimising and adapting to climate change (Objectives 1, 2 and 3).</p> <p>The policy would ensure the Local Plan has a significant positive impact on Objective 3, and would provide decent, affordable homes. However, the numbers of homes may be reduced because of the outdoor space requirements.</p> <p>Good layout and space standards promotes sustainable communities and encourages active lifestyles (Objective 9) by ensuring amenity between neighbouring properties are protected; allows for children to have access to adequate outdoor space for safe, exercise and outdoor play; encourages hobbies such as gardening and home-grown food opportunities.</p> <p>The policy is not considered to have an impact on Objectives 5, 7 or 8.</p>			
Option 2: To include a Policy linking to external and internal space standards within supplementary planning 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>++</p> <p>++</p> <p>++</p> <p>+?</p> <p>0</p> <p>++</p> <p>0</p> <p>0</p> <p>?</p>	
<p>Commentary</p> <p>With the reliance of guidance in SPD rather than the Local Plan it is considered the consistency of implementation of the standards may be reduced leading to greater uncertainty of delivery of the Sustainability Objectives.</p>			

<p>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.</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;">0 0 +? +? 0 0 0 0 0</p>	
<p>Commentary Without any local policy it would be impossible to insist on locally distinctive standards or provide certainty.</p>			
<p>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.</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;">+? +? + + 0 +? 0 0 +</p>	
<p>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 (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 (Objective 3). Good layout and space standards promotes sustainable communities (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 (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 Objectives 5, 7 or 8.</p>			

Policy DD4: Tree Replacement Standards			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
<p>Chosen Option</p>	<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 (G12) and retaining the requirement for additional planting compensating for loss of trees as a standalone 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 Objectives 7 and 9. There would be a neutral impact on the provision in respect of Objectives 4, 5 and 8 although a more attractive environment could assist in attracting investment. 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>		
<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</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 	<p style="text-align: center;">++ ++ ++ / /</p>	

new development and a second requiring additional planting and compensating for loss of trees (DD4).	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 7 and 9 of living and or working in a more positive environment enhanced by natural capital.			
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	/	
Commentary			
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).			
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 (DD4).	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 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 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 with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
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	<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 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.</p>			
Option 2: Don't include a policy on aerodrome safeguarding and continue to rely on Planning Circular 01/2003	<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 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.</p>			

Policy DD6: Advertisements			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
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 style="text-align: center;">0 0 ++ 0 + ++ 0 0 +</p>	

	Commentary Applications for advertisement consent should be determined in accordance with amenity and public safety, which relate to Sustainability Objectives 1, 6 and 9. Effective and clear regulation of advertisements also has the potential to support objective 5, through businesses being able to judge more easily what is and is not likely to be acceptable.		
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 style="text-align: center;">0 0 + 0 +? + 0 0 +?</p>	
	Commentary 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.		

Policy DD7: Crossovers

Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 1: A policy to allow crossovers. Although planning permission is not required to use front gardens for parking, where access to that area is from a classified road over a pavement or verge then planning permission is required. It is acknowledged that facilitating the provision of car parking could help encourage car ownership and therefore have a negative impact on SA objective 7. However, having a policy helps to minimise the impact on verges and the streetscene by only allowing crossovers where the local amenity are not adversely affected.		
Option 1: A policy to allow crossovers.	<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>	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 CD9 states that crossovers will only be permitted where the amenity of the street scene is not adversely affected.
	Commentary As a result of its development as a new town, parking provision within the curtilages of houses in the older new town areas is limited which leads to significant levels of on-street parking. This can cause highway safety issues and could be considered unsightly. There may also be issues relating to surface water run off by the removal of permeable areas. Although, taken as a whole, the policy could be considered to have a negative impact on sustainability objectives, it does ensure that the impact on the street scene is more fully considered rather than relying on general design policies.		
Option 2: Rely on general design policies	<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 	<p style="text-align: center;">? - ? 0 0 -</p>	

biodiversity and landscape	-	
7. Promote sustainable journeys	0	
8. Provide sufficient infrastructure	0	
9. Promote sustainable communities and Encourage active lifestyles		
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 with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>Option 3: Include overarching policy for all heritage assets (including undesignated heritage assets), with policies relating to specific types of designated assets within Crawley.</p> <p>Option 3 has been chosen as it represents the best way to adhere to the NPPF and ensure that the requirements on development relate to the significance of the heritage asset in question. By setting minimum requirements for all heritage assets (designated & undesignated) the basic requirements are set, this can then be built upon utilising further policies relating to specific designations relating to their significance.</p>		
Option 1: Have no policy on heritage assets.	<ol style="list-style-type: none"> 1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles 	<p>0</p> <p>?</p> <p>--</p> <p>0</p> <p>/</p> <p>0</p> <p>0</p> <p>0</p> <p>0</p> <p>-</p>	
<p>Commentary</p> <p>The NPPF instructs Local Planning Authorities to include a “positive strategy for the conservation and enjoyment of the historic environment”. Option 1, which is not to include anything would, therefore, not be an appropriate option.</p> <p>This option does not promote or enhance the locally distinctive nature of the town and its unique history and character, nor would it allow for any new areas to be protected, or those that develop over time.</p> <p>The lack of clarity given to a new policy approach could lead to inappropriate developments and the loss of key features throughout the town.</p>			
Option 2: Include single policy relating to all heritage assets (including undesignated heritage assets) with no other policies.	<ol style="list-style-type: none"> 1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles 	<p>0</p> <p>?</p> <p>+</p> <p>0</p> <p>/</p> <p>0</p> <p>0</p> <p>0</p> <p>0</p> <p>+</p>	
<p>Commentary</p> <p>It was considered that a single policy may be appropriate for all heritage assets however</p>			

	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.		
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 style="text-align: center;">0 ? ++ 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 with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>Option 2: Include Policy for Conservation Area designation.</p> <p>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.</p>		
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 style="text-align: center;">0 ? - 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 HA1. This option was ruled out due to the preferred option from HA1.</p>			
Option 2: Include Policy for Conservation Area designation.	<ol style="list-style-type: none"> 1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles 	<p style="text-align: center;">0 ? + 0 / 0 0 0 0 +</p>	
<p>Commentary</p> <p>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.</p>			

Policy HA3: Areas of Special Local Character			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 3: Include policy for ASLC 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 HA1. This option was ruled out due to the preferred option from 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 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 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 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 with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 3: Include Policy for Listed Buildings & Structures. Option 3 has been chosen to ensure that the Listed Buildings are given the correct weight in planning decisions relevant to their significance. Whilst Listed Buildings are protected by law, including a specific policy that will apply to them will ensure that the planning system does not overlook the designation and afford their significance due weight.		
Option 1: Do not include a policy relating to Listed Buildings & Structures. Relying on a single overarching policy.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities 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 HA1. This option was ruled out due to the preferred option from 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 +?	
Commentary A policy relating to all national designations was considered as a way of reducing the number of policies in the plan however the sustainability appraisal showed that as the policy would not be specific enough the benefits of the policy would be restricted. Whilst it may have allowed greater flexibility across designations it would not have been effective enough.			
Option 3: Include policy for Listed Buildings & Structures.	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 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 with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
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 HA1. This option was ruled out due to the preferred option from 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 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 9. Promote sustainable communities and Encourage active lifestyles	0 ? ++ 0 / 0 0 0 +	
Commentary This option has been chosen as provides the best outcome. Ensuring development matched the significance of the heritage asset is key and by ensuring policy reflects this is vital to ensure the built environment is protected and enhanced as we move forwards.			

Policy HA6: Historic Parks and Gardens			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
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 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. Sustainability 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 with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
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 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 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

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 with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>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.</p> <p>Option 1 is chosen as it makes the best use of open space to meet Local Plan and SA/SEA Objectives</p>		
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.	<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>	Mitigation not required as no negative impacts identified.
<p>Commentary</p> <p>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.</p>			
Option 2: Protect all open space unless proposals clearly show the site to be surplus.	<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 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.</p>			

Policy OS2: Provision of Open Space and Recreational Facilities			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
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 / + / + +	
	Commentary 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. 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.		
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 / + + ++ ++	
	Commentary This option also includes s106 agreements as a method of securing the replacement of open space. Providing a positive impact to SA Objectives 1, 2, 3, 4, 6, 7, 8 and 9. SA Objective 5 has a neutral impact although the type of provision may increase opportunities for employment.		
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 - -	
	Commentary Over time the impact of an increased population but no additional open space will place greater pressure on existing spaces and facilities. The quality of these spaces will be negatively affected and the consequence could be a decline in the health and well-being of Crawley residents.		

Policy OS3: Rights of Way and Access to the Countryside

Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 1: Maintain and enhance Public Rights of Way. The most suitable option is to maintain and enhance PRoW as it has most positive impact on sustainability.		
Option 1: Maintain and enhance Public Rights of Way.	1. Minimise climate change 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 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	++ + ++	
	Commentary This option encourages use of rights of way for health and well-being as well as a route to get to work or other locations. 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 PRoW should be protected or identification of specific opportunities to enhance PRoW.		

Infrastructure Provision

Policy IN1: Infrastructure Provision			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
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 on existing 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	+ + 0 + + + + ++ +	
	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 with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
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 objective 1 and 7). If infrastructure is accessible by public transport or can be walked or cycled to, there are benefits in terms of reduced car trips and reduced pollution. Some forms of infrastructure do not generate a significant number of trips as they contain 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 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			
Locating facilities in the most accessible locations will affect how people choose to travel to the facilities. The neighbourhood structure of the town also helps encourage the provision of facilities with a neighbourhood catchment within the neighbourhoods themselves. Maximising the number of people walking, cycling and using public transport can help reduce car journeys, pollution and the impact on climate change. The provision of facilities in accessible locations can maximise the use of health, sports and social facilities for people who do not have access to a private car. This can therefore contribute to SA objective 9.			
Option 2: Do not include a policy regarding location of infrastructure and instead rely on the NPPF policies.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	- - / 0 - - - - -	

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 with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>Option 1: A specific policy relating to the delivery of telecommunications.</p> <p>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.</p> <p>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.</p>		
Option 1: A specific policy relating to the strategic delivery of telecommunications.	<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>Commentary</p> <p>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.</p>			
Option 2: Relying on the policies dealing with the general provision of infrastructure.	<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>Commentary</p> <p>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.</p>			

Economic Growth

Policy EC1: Sustainable Economic Growth			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>Option 3: Adopt a spatial approach which recognises Crawley as a key employment destination and plans positively for economic growth within the borough through the identification of a minimum 38.7ha employment land. 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. Identify new employment land through supporting small extensions to Manor Royal where this would deliver business floorspace. Allocate 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 supported and 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: Based upon the Experian Baseline Job Growth projection, there is need for a minimum 38.7 hectares new employment land to accommodate business needs in Crawley Borough over the period to 2036. The identified need is significantly within the industrial sector (32.8ha), with office needs accounting for 5.9ha of the total. Crawley's Employment Land Trajectory (September 2020) identifies an available employment land supply pipeline of 17.6ha, which comprises 8.8ha office land and 8.7ha industrial 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 (B2 manufacturing and B8 storage and distribution). With an existing available industrial land supply pipeline of 8.7ha, there remains an outstanding need for 24.1ha new industrial land. The Option 1 approach would rely on the NPPF to direct employment uses to the most appropriate and sustainable locations. However, 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 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.</p>			
Option 2: Apply a supply-led approach based on labour supply, with employment requirements derived from Crawley's supply-led housing figure of 347dpa. Plan only for the level of need that can be	<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 	<p>-?</p> <p>-?</p> <p>+</p> <p>+</p> <p>+?</p> <p>?</p>	

<p>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.</p>	<ol style="list-style-type: none"> 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles 	<p>+? ? +?</p>	
<p>Option 3: Adopt a spatial approach which recognises Crawley as a key employment destination and plans positively for economic growth within the borough through the identification of opportunities for a minimum 38.7ha employment land. 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 new employment land through small extensions to Manor Royal where this would deliver business floorspace.</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>? ? + + ++ +? + + ++</p>	<p>It will be important to ensure that any new employment land coming forward as an extension to Manor Royal appropriately mitigates impacts on biodiversity and landscape character. This would need to be demonstrated through the planning application process.</p>
	<p>Commentary: Based upon the Experian Baseline Job Growth projection, there is need for a minimum 38.7 hectares new employment land to accommodate business needs in Crawley Borough over the period to 2036. The identified need is significantly within the industrial sector</p>		

<p>Allocate land at Gatwick Green as a Strategic Employment Location to accommodate Crawley's significant industrial and warehouse land requirements.</p>	<p>(32.8ha), with office needs accounting for 5.9ha of the total. Crawley's Employment Land Trajectory (September 2020) identifies an available employment land supply pipeline of 17.6ha, which comprises 8.8ha office land and 8.7ha industrial 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 (B2 manufacturing and B8 storage and distribution). With an existing available industrial land supply pipeline of 8.7ha, there remains an outstanding need for 24.1ha new industrial land.</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 38.7ha employment land. This will be achieved through an approach that protects and maximises use of the designated main employment areas for economic growth, including the mixed-use business function of Manor Royal, whilst supporting small scale extensions to Manor Royal where these can be accommodated outside of the safeguarded land and would provide additional business-led employment land. This approach will meet Crawley's employment needs in the early part of the Plan period.</p> <p>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 24.1ha new B8 industrial land (minimum 77,800sqm floorspace). This level of growth can most sustainably be located in Crawley, and Gatwick Green is the only in Crawley that is capable of providing the required quantum of growth without prejudicing the possible delivery of a southern runway at Gatwick Airport should this be required by the Government. It is anticipated that delivery would take place Years 6-15 of the Plan, meeting Crawley's employment needs in the later part of the Plan period.</p> <p>The draft Local Plan had previously committed to the preparation of a North Crawley Area Action Plan (AAP) that would consider if Gatwick Airport safeguarding should be retained or amended, and to assess in further detail a number of sites within the safeguarding boundary that had been promoted to the council for employment use. Since 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 means that it is considered that land at Gatwick is still required to be safeguarded for a potential future runway. With most of the sites promoted to the council for employment 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 through an Area Action Plan for allocation, as to do so would be contrary to national policy. The Gatwick Green site 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 and therefore not required for the physical land take of a new runway, could be developed as a strategic employment site.</p> <p>Through applying the Option 3 approach, the Local Plan sets out a strategy that responds to economic growth based upon the detailed 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, and also support the growth of Manor Royal through small scale extensions for business land, an approach that will meet Crawley's employment land requirements in the early part of the Plan period. However, there is evidenced need for growth that goes beyond the existing land supply pipeline, necessitating a requirement to identify new employment land to accommodate Crawley's substantial industrial land needs that cannot be met within Crawley without identification of a strategic employment location at Gatwick Green. This will enable Crawley to meet its business land requirement in full, ensuring a sufficient supply of employment land in Crawley in the later part of the Plan period. In doing so, the approach will enable 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.</p>
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Policy EC2: Economic Growth in Main Employment Areas			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 2: Retain the 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 Employment Areas. Rely only on the National Planning Policy Framework to ensure that economic growth is directed to the most sustainable and appropriate locations.	<ol style="list-style-type: none"> 1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/ support employment base 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles 	<p>-? -? 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.</p> <p>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>			
Option 2: Retain the 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.	<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>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.</p> <p>Option 2 would enable the Local Plan to plan to proactively plan for the needs of business</p>			

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 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 with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
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.	<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 + + +</p>	
<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 sites.</p>	<ol style="list-style-type: none"> 1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home. 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities 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 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.</p> <p>The approach would provide a policy hook for the Manor Royal Design Guide SPD, which is recognised as a key means of improving the overall Manor Royal environment, in terms of aesthetic appearance, usability, legibility, landscaping, and enhancement of biodiversity. However, without taking a managed approach to manage the economy through policy, there is risk that the overall business function of the estate may be fundamentally undermined.</p> <p>Environmental improvement through the Manor Royal SPD may have a positive (uncertain) impact on climate change minimisation and adaptation, because the economy might not perform well (SA objectives 1 & 2) and also environmental improvements to the built environment (SA objective 3) and the creation new habitat areas (SA objective 6). There is an uncertain effect from enhanced retail and leisure in Manor Royal, but this undoubtedly creates new jobs, 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>			
<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.</p> <p>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>	
<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</p>			

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 with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 2: Allocate an industrial-led Strategic Employment Location through a dedicated Local Plan policy that sets out site specific requirements for the site. 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.		
Option 1: Allocate an industrial-led Strategic Employment Location only through Strategic Policy EC1	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 ++ -? -? -? -?	
Commentary Local Plan Strategic Policy EC1 establishes the amount and type of employment land and floorspace that is required in Crawley over the Plan period to 2036, 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.		
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 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>	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 development, including the need to conserve and enhance biodiversity habitats, can be set out to ensure that appropriate mitigation is provided.
<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 to 2036, 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>			
Option 3: Explore the scope to allocate an industrial-led Strategic Employment Location through an Area Action Plan.	<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;">?</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>This option was consulted upon in draft form at the previous stage of Regulation 19 Local Plan consultation. 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 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</p>

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, and cannot therefore 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.

Policy EC5: Employment and Skills Development			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 2: Pro-actively support the Crawley Employment and Skills Programme through a specific Local Plan policy.		
Option 1: Do not provide a specific skills policy, relying on the Employment and Skills Programme to help address the skills gap.	<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>+?</p> <p>+</p> <p>0</p> <p>+?</p> <p>0</p> <p>+?</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. Crawley's economy has been significantly impacted by the economic implications from Covid-19, with over half of all of Crawley's jobs at risk of being either furloughed or lost completely, and once the Job Retention Scheme is withdrawn (end of October 2020) further economic implications are likely to occur. This increases the need to provide the support and training to enable impacted residents to access new opportunities arising from economic diversification, helping to offset some of the Covid-19 impacts on employment.</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>			
Option 2: Pro-actively support the Crawley Employment and Skills Programme 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 9. Promote sustainable communities and Encourage active lifestyles 	<p>+</p> <p>+</p> <p>+</p> <p>+</p> <p>++</p> <p>0</p> <p>+</p> <p>0</p> <p>+</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. Crawley's economy has been significantly impacted by the economic</p>			

implications from Covid-19, with over half of all of Crawley's jobs at risk of being either furloughed or lost completely, and once the Job Retention Scheme is withdrawn (end of October 2020) further economic implications are likely to occur. This increases the need to provide the support and training to enable impacted residents to access new opportunities arising from economic diversification, helping to offset some of the Covid-19 impacts on employment.

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, subject to viability testing. 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.

Policy EC6: Office Provision

Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
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 0 0 0 + 0 0 0 0</p>	
<p>Commentary 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>+ ? + 0 ++ 0 0 0 +</p>	

Commentary

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.

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.

Policy EC7: Visitor Accommodation			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
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 GAT3, preventing the provision of airport-related parking in off-airport hotels and requiring on- airport hotels to comply with the GAT3 requirements.		
Option 1: Not to include a specific policy relating to visitor accommodation	<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>0</p> <p>0</p> <p>--</p> <p>0</p> <p>0</p>	
	<p>Commentary</p> <p>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 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 GAT3 but it is considered that a dedicated hotel and visitor accommodation policy adds further clarity.</p>		
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	<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>0</p> <p>+</p> <p>0</p> <p>++</p>	

Gatwick Airport. The policy also ensures consistency with GAT3, preventing the provision of airport-related parking in off-airport hotels and requiring on- airport hotels to comply with the requirements of GAT3,	8. Provide sufficient infrastructure	0	
	9. Promote sustainable communities and Encourage active lifestyles	0	
<p>Commentary</p> <p>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.</p> <p>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 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 GAT3 but it is considered that a dedicated hotel and visitor accommodation policy adds further clarity.</p> <p>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.</p>			
Option 3: Include the Visitor Accommodation policy but without the restriction on off-airport parking at off-airport hotels.	1. Minimise climate change	--	
	2. Adapt to climate change	--	
	3. Protect/enhance built environment	0	
	4. Decent, affordable homes	0	
	5. Maintain/support employment	+	
	6. Conserve/enhance biodiversity and landscape	0	
	7. Promote sustainable journeys	--	
	8. Provide sufficient infrastructure	0	
	9. Promote sustainable communities and Encourage active lifestyles	0	
<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 with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
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	1. Minimise climate change	0	
	2. Adapt to climate change	0	
	3. Protect/enhance built environment	0	
	4. Decent, affordable homes	0	

	5. Maintain/support employment	0	
	6. Conserve/enhance biodiversity and landscape	0	
	7. Promote sustainable journeys	0	
	8. Provide sufficient infrastructure	0	
	9. Promote sustainable communities and Encourage active lifestyles	0	
	Commentary 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.		
Option 2: Support the evening and night-time economy through a specific Local Plan policy.	1. Minimise climate change	0	
	2. Adapt to climate change	0	
	3. Protect/enhance built environment	0	
	4. Decent, affordable homes	0	
	5. Maintain/support employment	+	
	6. Conserve/enhance biodiversity and landscape	0	
	7. Promote sustainable journeys	+?	
	8. Provide sufficient infrastructure	0	
	9. Promote sustainable communities and Encourage active lifestyles	0	
	Commentary 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.		

Policy EC9: Creative Industries			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
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.	1. Minimise climate change	0	
	2. Adapt to climate change	0	
	3. Protect/enhance built environment	0	
	4. Decent, affordable homes	0	
	5. Maintain/support employment	+	
	6. Conserve/enhance biodiversity and landscape	0	
	7. Promote sustainable journeys	0	
	8. Provide sufficient infrastructure	0	
	9. Promote sustainable communities and Encourage active lifestyles	+	
	Commentary 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 proactive in planning for what is identified by the LEP as a priority issue. As such, this is not the most sustainable option.		
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 style="text-align: center;">0 0 0 0 ++ 0 0 0 +</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 with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
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.	<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 0 +</p>	
<p>Commentary</p> <p>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.</p>			
Option 2: Do not include a policy on flexible temporary art and creative 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 style="text-align: center;">0 0 ? 0 ? 0 0 0 +?</p>	
<p>Commentary</p>			

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 Residential Amenity			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
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 ++ ++ 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 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 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 with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
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.	<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, 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 	<p style="text-align: center;">-</p> <p style="text-align: center;">-</p> <p style="text-align: center;">?</p> <p style="text-align: center;">?</p> <p style="text-align: center;">-?</p> <p style="text-align: center;">0</p> <p style="text-align: center;">-</p> <p style="text-align: center;">-</p> <p style="text-align: center;">-</p> <p style="text-align: center;">0</p>	
	<p>Commentary</p> <p>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.</p> <p>Although Option 1 would help retain a retail focus at parades, there is risk that the approach is too prescriptive. This is particularly likely to be the case in smaller parades, where a single convenience retailer acts as a main anchor store, 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.</p> <p>By prescriptively setting out acceptable uses at neighbourhood parades there is risk that Option 1 reduces choice and therefore increases the need to travel, impacting negatively against Objectives 1, 2, 5, 7, 8, and 9. Local Plan policies SD1, ENV6, 7, 9, and 10 may help mitigate against some negative impacts. However, an approach that potentially harms the parades would be difficult to mitigate against in full.</p>		
Option 2: Moderate Flexibility: Change of use applications considered on individual merits having regard to the impact that a proposal would have on the parade's ability to meet the everyday needs of residents.	<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, 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 	<p style="text-align: center;">+</p> <p style="text-align: center;">+</p> <p style="text-align: center;">++</p> <p style="text-align: center;">?</p> <p style="text-align: center;">+</p> <p style="text-align: center;">0</p> <p style="text-align: center;">++</p> <p style="text-align: center;">++</p> <p style="text-align: center;">++</p> <p style="text-align: center;">++</p>	
	<p>Commentary</p> <p>This option would retain an approach similar to that employed in the 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</p>		

	<p>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 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. Option 2 is therefore considered to represent the most sustainable approach.</p>		
Option 3: High Flexibility: Implement a highly flexible approach with minimal policy restriction.	<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, 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 	<p>-</p> <p>-</p> <p>?</p> <p>?</p> <p>-?</p> <p>0</p> <p>-</p> <p>-</p> <p>0</p>	
<p>Commentary</p> <p>This option would take a highly flexible approach, not placing any restriction on the proportion of non-retail uses locating in neighbourhood centres. There is significant risk that 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.</p>			

Policy EC13: Rural Economy			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
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.	<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>0</p> <p>+</p> <p>0</p> <p>+</p> <p>-</p> <p>0</p> <p>+</p> <p>0</p>	<p>Negative impact against Objective 6 may potentially be mitigated through locating rural economic development as close to built up areas as is practicable.</p>
<p>Commentary</p> <p>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.</p>			
Option 2: Encourage the rural economy, regardless of landscape character and	<ol style="list-style-type: none"> 1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 	<p>-</p> <p>-</p> <p>0</p>	

use.	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	-	
	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 with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>Option 1: Development of the Airport with a Single Runway.</p> <p>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 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 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.</p>		
Option 1: Support the 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.	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	Section 106 Agreement with the airport operator which sets out obligations relating to mitigating the environmental impact of the airport.
Commentary			
<p>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.</p> <p>The policy and S106 Agreement will help ensuring that environmental impacts are minimised, and mitigated if necessary. 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.</p>			

	<p>Part of the S106 Agreement seeks to increase the proportion of passengers coming by public transport to help minimise the number of journeys made by car to the airport.</p> <p>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.</p>		
Option 2: Assess applications against general planning 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>--</p> <p>--</p> <p>0</p> <p>0</p> <p>+</p> <p>/</p> <p>-</p> <p>+</p> <p>0</p>	<p>S106 would remain in place without a dedicated policy, but referring to the legal agreement in policy is helpful.</p>
<p>Commentary</p> <p>The alternative to assessing applications against a specific Gatwick policy is to rely on general planning policies elsewhere in the Plan. This could mean that the growth of the airport 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.</p>			
Option 3: Use Gatwick Airport Master Plan 2019 boundary as the policy 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 would remain in place with the airport operator which sets out obligations relating to mitigating the environmental impact of the airport.</p>
<p>Commentary</p> <p>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.</p>			

Policy GAT2: Safeguarded Land			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
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 style="text-align: center;">?</p> <p style="text-align: center;">?</p> <p style="text-align: center;">?</p> <p style="text-align: center;">0</p> <p style="text-align: center;">?</p> <p style="text-align: center;">--</p> <p style="text-align: center;">?</p> <p style="text-align: center;">?</p> <p style="text-align: center;">-</p> <p style="text-align: center;">0</p>	
<p>Commentary</p> <p>The government published the Airports National Policy Statement (ANPS) in June 2018. This set out the government’s decision to support a third runway at Heathrow. The ANPS was challenged through the Courts but the Supreme Court in December 2020 concluded it was lawful. 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 in para 3.66 that “<i>It is prudent to continue with a safeguarding policy to maintain a supply of land for future national requirements and to ensure that inappropriate developments do not hinder sustainable aviation growth</i>”. This document has not yet been progressed further. 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 relief road. 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 (do not safeguard land)	<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;">-0</p> <p style="text-align: center;">+</p> <p style="text-align: center;">0</p> <p style="text-align: center;">++</p> <p style="text-align: center;">--</p> <p style="text-align: center;">-</p> <p style="text-align: center;">++</p> <p style="text-align: center;">+0</p>	
<p>Commentary</p> <p>This option was consulted upon in draft form at the previous stage of Regulation 19 Local Plan consultation. 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 Regulation 19 Local Plan consultation was undertaken in January 2020, guidance from the Planning Inspectorate with regard to the need for certainty regarding</p>			

	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.		
Option 3: Safeguard land for future runway growth with an amended boundary to allow for strategic employment 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>	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>The government published the Airports National Policy Statement (ANPS) in June 2018. This set out the government's decision to support a third runway at Heathrow. The ANPS was challenged through the Courts but the Supreme Court in December 2020 concluded it was lawful. 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 in para 3.66 that "<i>It is prudent to continue with a safeguarding policy to maintain a supply of land for future national requirements and to ensure that inappropriate developments do not hinder sustainable aviation growth</i>". This document has not yet been progressed further. 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 59ha site is located east of Gatwick Airport, on land identified by the Gatwick Airport Master Plan for safeguarding. However, unlike the 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.</p>			

Policy GAT3: Gatwick Airport Related Parking			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>Option 1: 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</p>		

	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.		
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.	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	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.
	Commentary 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 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 2022'. 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. . 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. 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 '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'. 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.		
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	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 alternative option considered was to allow off-airport parking provision for airport-related		

parking where it is justified by a demonstrable need. However, 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 2022'. 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.

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.

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 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.

Policy GAT4: Employment Uses at Gatwick			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
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 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>+</p> <p>0</p> <p>0</p> <p>0</p>	
	<p>Commentary</p> <p>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.</p> <p>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.</p>		
Option 2: Allowing office floorspace to be used by non-airport related uses without assessing need and impact.	<ol style="list-style-type: none"> 1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 	<p>0</p> <p>0</p> <p>0</p> <p>0</p> <p>+</p> <p>?</p>	

	7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+ 0 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 with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 2: Managed Primary Frontage flexibility, fully flexible Secondary Frontage		
Option 1: Fully Flexible Frontages	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 ? +?	
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 existing 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.	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 This approach would involve the continuation of the 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.

Policy TC2: Town Centre Neighbourhood Facilities			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
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, and through both planned development and prior approval schemes there are now 831 dwellings in the Town Centre. It is anticipated that, over the Plan period to 2035, a further 2,200 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. Option 1 therefore represent the more sustainable approach.</p>		
Option 2: Rely on more general Local Plan policies to support the delivery of 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 0 ? ? +? 0 - - -</p>	
	<p>Commentary</p> <p>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</p>		

	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.
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Policy TC3: Development Sites within the Town Centre Boundary

Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
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.	<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;">+</p> <p style="text-align: center;">+</p> <p style="text-align: center;">+?</p> <p style="text-align: center;">+</p> <p style="text-align: center;">+?</p> <p style="text-align: center;">0</p> <p style="text-align: center;">+?</p> <p style="text-align: center;">+</p> <p style="text-align: center;">+</p>	
<p>Commentary</p> <p>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 Sustainability Objectives 4, 5 and 10, depending upon development type). An increased allocation of sustainable town centre and edge-of-centre mixed-use development sites also supports the reduction of car journeys (objective 7) and promotes sustainable communities (objective 9). Through CIL, this option will also ensure the provision of sufficient infrastructure (objective 8). 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. It is, however, 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 allocations. Provide flexible policy guidance to facilitate delivery.	<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;">+</p> <p style="text-align: center;">+</p> <p style="text-align: center;">++</p> <p style="text-align: center;">++</p> <p style="text-align: center;">++</p> <p style="text-align: center;">0</p> <p style="text-align: center;">++</p> <p style="text-align: center;">+</p> <p style="text-align: center;">++</p>	
<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</p>			

deliver homes, jobs, and leisure provision (meeting Sustainability Objectives 4, 5 and 10, depending upon the development type). An increased allocation of sustainable town centre and edge-of-centre mixed-use development sites also supports the reduction of car journeys (SA Objective 7) and promotes sustainable communities (SA Objective 9). Through developer contributions, this option can also ensure the provision of sufficient infrastructure (SA Objective 8).

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.

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.

Policy TC4: Active and Engaging Frontages			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
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 +	
Commentary 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.			
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 ++	
Commentary 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 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.			

Policy TC5: Town Centre First			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
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, and Option 2 is therefore 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. 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</p>			

the promotion of a vital and viable town centre, whilst enabling the development of 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 with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>Option 5: 'Supply-led' locally determined housing requirement (minimum of 333 dwellings p.a. over period 2021-2037, stepped as a 350dpa requirement over years 1-5, a 450dpa requirement over years 6-10, and 220dpa in years 11-16) with 'unmet need' expressed.</p> <p>Option 5 has the most positive impact across the various sustainability indicators and is the preferred option. It is considered that housing provision significantly above these levels could not be sustained over the Plan period to 2037, as informed by the council's urban capacity, open space, economic growth and transport modelling work.</p> <p>Mitigation of negative impact on SA Objective 4 (Opportunity to live in a decent and affordable home) is 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.</p>		
Option 1: Housing requirement of 1848dpa based on identified affordable housing need of 739dpa (i.e. total housing required to meet need on basis of 40% affordable housing provision)	<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>0-</p> <p>-</p> <p>--</p> <p>++</p> <p>-</p> <p>--</p> <p>/</p> <p>-?</p> <p>--</p>	
<p>Commentary</p> <p>A housing figure based on the amount of housing that would need to be delivered in order to meet identified affordable housing need (assuming a 40% affordable housing requirement as a reasonably viable requirement) is considered to involve a significant positive impact on objective 4, ensuring everyone has the opportunity to live in a decent and affordable home. It should be noted, however, that 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. It should be noted that there is not an identified need for this level of housing, it simply relates to the level of market housing required to support the full amount of affordable housing being provided as a ratio of 40% of the development levels. It 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>			

	<p>The release of land required by this option is considered to have less positive impacts on other indicators. Neutral impacts are anticipated regarding objective 7, as reduced space available for transport infrastructure and corridors are likely to counteract the benefits of greater accessibility in the context of a denser pattern of development. Negative impacts are anticipated for other indicators. This includes objective 5 owing to anticipated losses of employment land which would be unlikely to be offset by reduced housing-related supply-side constraints on the labour market and the expansion of construction activity. A negative impact on objective 2 would also be anticipated on the basis of impact on flood resilience and the cooling services provided by green infrastructure, while shortage of land available for provision or expansion of infrastructure facilities could also have a possible negative impact on objective 8. Significant negative impacts are anticipated for SA objectives 3, 6 and 9, owing to anticipated losses of green infrastructure, open space facilities, and impact on space and accessibility standards, existing character and heritage assets. SA objective 1 was ruled out on the basis that it is not specifically related to overall levels of housing provision.</p>		
<p>Option 2: Housing requirement based on Government's standard method for calculating housing need, excluding the cap (750 dwellings p.a.).</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;">0 -? -- ++ - -- / -? --</p>	
<p>Commentary Sustainability impacts of this option are considered to be similar to those of option 1 in so far as actual levels of housing delivery achieved would be closer than the respective requirements suggest, owing to anticipated problems around the deliverability of the option 1 requirement. Hence significant positive impacts arise in respect of objective 4 due to the meeting of housing need, while neutral impacts arise in respect of objective 7, since the benefits of the focusing of development within an accessible urban area would be expected to be offset by losses of land that could otherwise be used for better transport infrastructure. Negative impacts are anticipated elsewhere. This includes objective 5, owing to impacts on employment land supply, and possible or slight negative impacts in relation to climate change adaptation (objective 2) and the provision of significant infrastructure (objective 8), owing to pressure on existing services and more limited potential for their expansion. As with option 1, significant negative impacts on objectives 3, 6 and 9 owing to the anticipated effects of significant densification on character, heritage assets, biodiversity, landscape and standards of internal, external and public open space. Objective 1 is scoped out as in option 1.</p>			
<p>Option 3: Housing requirement based on Government's standard method for calculating housing need, including the cap (476 dwellings p.a.).</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 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles 	<p style="text-align: center;">0 -? - + -? - / 0 --</p>	
<p>Commentary A housing figure derived from the government's Standard Method, including the 40% cap on the existing Local Plan requirement, would have a positive impact on sustainability objective 4, ensuring everyone has the opportunity to live in a decent and affordable home. However, it would have a negative impact on SA objectives 3 (protect/enhance built environment) and 6</p>			

	<p>(conserve/enhance biodiversity and landscape) in view of the amount and nature of land that would have to be developed to provide housing at this level over the Plan period. As in the case of options 1 and 2, development at this level is considered to involve a significant negative impact on objective 9 (healthy, active, cohesive and socially sustainable communities/active 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 on available land would also be considered to involve potential negative impacts regarding objective 2 (climate change mitigation) and objective 5 (maintain/support employment base). SA objectives 1 and 8 were ruled out on the basis that they are not considered to be affected by housing provision at this level. Neutral impacts are anticipated in relation to objective 7 on the same basis as set out in relation to options 1 and 2, with some positive impacts from additional residential development within the borough (i.e. in terms of a more compact pattern of development) being set against negative impacts associated with land constraints.</p>		
<p>Option 4: 'Supply-led' locally determined housing requirement (minimum of 333 dwellings p.a. over period 2021-2037, stepped as a 350dpa requirement over years 1-5, 450dpa in years 6-10, and 220dpa 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 style="text-align: center;">0 + + - + + / 0 +</p>	
	<p>Commentary A supply-led housing figure has merit in view of the constrained nature of the borough in terms of land supply. It is considered that annual provision above these levels could not be sustained over the plan period, as informed by the council's urban capacity and transport modelling work. However, it is acknowledged that such an approach, which involves providing housing at levels significantly below demographic requirements, will have a negative impact on Sustainability Objective 4, to ensure everyone has the opportunity to live in a decent and affordable home. The impacts on Sustainability Objectives 2 (adapt to climate change), 3 (protect/enhance built environment), 5 (maintain/support employment base) 6 (conserve/enhance biodiversity habitats/landscape), and 9 (healthy and active lifestyles/cohesive and sustainable communities) are deemed to be positive, in terms of the protection given to land serving specific functions, and to beneficial aspects of the wider natural and built environment, including water resource management and open space facilities. Impacts on objective 7 (transport infrastructure/reduced car use) are considered neutral, and no impacts are anticipated in respect of objectives 1 (climate change mitigation) and 8 (infrastructure).</p>		
<p>Option 5: 'Supply-led' locally determined housing requirement (minimum of 333 dwellings p.a. over period 2020-2035, stepped as a 350dpa requirement over years 1-5, 450dpa in years 6-10, and 220dpa in years 11-15) with 'unmet need' expressed.</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;">0 + + -? + + / 0 +</p>	<p>Mitigation of the potential negative impact on SA 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 working to ensure the delivery of sufficient housing in the mid to longer term where this is in accordance with other sustainable planning policies.</p>
	<p>Commentary A supply-led housing figure has merit in view of the constrained nature of the borough in terms</p>		

of land supply. It is considered that annual provision above these levels could not be sustained over the plan period, as informed by the council's urban capacity and transport modelling work. However, it is acknowledged that such an approach, which involves providing housing at levels significantly below demographic requirements, will have a negative impact on Sustainability Objective 4, to ensure everyone has the opportunity to live in a decent and affordable home. In this option, this is 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.

The impacts on Sustainability Objectives 2 (adapt to climate change), 3 (protect/enhance built environment), 5 (maintain/support employment base) 6 (conserve/enhance biodiversity habitats/landscape), and 9 (healthy and active lifestyles/cohesive and sustainable communities) are deemed to be positive, in terms of the protection given to land serving specific functions, and to beneficial aspects of the wider natural and built environment, including water resource management and open space facilities. Impacts on objective 7 (transport infrastructure/reduced car use) are considered neutral, and no impacts are anticipated in respect of objectives 1 (climate change mitigation) and 8 (infrastructure).

Policy H2: Key Housing Sites			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>Option 3: Identify specific 'deliverable' and 'developable' housing sites to meet Crawley's housing requirements over the Plan period (2021-2037) 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 2037. Para 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 (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>			

<p>Option 2: Identify specific 'deliverable' and 'developable' housing sites to meet Crawley's housing requirements over the Plan period (2021-2037).</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. 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 + + + 0 + + + +</p>	
<p>Commentary The application of this policy will have a positive impact on SA Objective 2 in terms of adaptation to the effects of climate change particularly in respect of flooding and effective management of water resources, Objective 3 (Protection and Enhancement of the Built Environment and Character), Objective 6 (Conservation and Enhancement of Biodiversity and Key Landscape Features) Objective 7 (Reduction in car journeys and promotion of sustainable methods of transport) and Objectives 8 and 9 to ensure the provision of sufficient infrastructure to meet the borough's requirements and promotion of healthy, active and mixed communities. SA objectives 1 and 5 were ruled out on the basis that they are not specifically related to the location of future housing development. Development sites identified for allocation include some existing open space sites, however, these have been allocated for housing and open space and include requirements for improvements to the remaining open space and outdoor recreation facilities this will ensure there is a neutral impact.</p>			
<p>Option 3: Identify specific 'deliverable' and 'developable' housing sites to meet Crawley's housing requirements over the Plan period (2021-2037) and provide more detailed criteria for specific housing sites.</p>	<ol style="list-style-type: none"> 1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment 4. 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 + + + 0 + + + ++</p>	<p>Mitigation not required as no negative impacts identified. The Open Space Assessment, and correlating Local Plan allocation requirements for mitigation, ensures that the housing allocations on open space sites will not result in a negative impact on healthy, active lifestyles through requirements for provision of access to good quality outdoor sport and play space. Impacts on heritage and biodiversity must be mitigated against through strong design and management criteria. Needs of older people can be helped to be met through the specific allocation of two housing sites for older people's accommodation.</p>
<p>Commentary By providing more detail within the policy in relation to some of the sites which have particular constraints or opportunities, the application of this policy will have a positive impact on SA Objective 2 in terms of adaptation to the effects of climate change particularly in respect of flooding and effective management of water resources, Objective 3 (Protection and Enhancement of the Built Environment and Character), Objective 6 (Conservation and Enhancement of Biodiversity and Key Landscape Features) Objective 7 (Reduction in car journeys and promotion of sustainable methods of transport) and Objectives 8 and 9 to ensure the provision of sufficient infrastructure to meet the borough's requirements and promotion of healthy, active and mixed communities. SA objectives 1 and 5 were ruled out on the basis that they are not specifically related to the location of future housing development. Development sites identified for allocation include some existing open space sites. However, as these have been allocated for housing and open space and include requirements for improvements to the remaining open space and outdoor recreation facilities this will ensure</p>			

there is a neutral impact. One of the allocation sites is likely to have some negative impact on the site specific nature conservation and heritage assets. Mitigation against this will be achieved by including detailed criteria and linking it to the preparation of a development brief. Evidence has indicated a need for provision of specialist housing to meet the needs of older people. 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.

Policy H3: Housing Typologies			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 1: Include an overarching residential ‘typology’ policy, setting general key design/amenity/ operational requirements for new residential developments. 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.		
Option 1: Include an overarching residential ‘typology’ policy, setting general key design/amenity/ operational requirements for new residential developments.	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	0	
	8. Ensure the provision of sufficient infrastructure	++	
	9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	0	
		?	
	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	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	0	
		?	
	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 with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
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.	<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 style="text-align: center;">+</p> <p style="text-align: center;">++</p> <p style="text-align: center;">++</p> <p style="text-align: center;">0</p> <p style="text-align: center;">/</p> <p style="text-align: center;">0</p> <p style="text-align: center;">0</p> <p style="text-align: center;">++</p>	
<p>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.</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 style="text-align: center;">+?</p> <p style="text-align: center;">+</p> <p style="text-align: center;">+</p> <p style="text-align: center;">+</p> <p style="text-align: center;">0</p> <p style="text-align: center;">/</p> <p style="text-align: center;">0</p> <p style="text-align: center;">0</p> <p style="text-align: center;">+</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 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 with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 1: Include a specific 'typology' policy for Infill Opportunities and Small Sites. 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.		
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 style="text-align: center;">0 / ++ + 0 ++ 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 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 style="text-align: center;">0 / + + 0 + 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 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>			

Policy H3c: Housing Typologies: Town Centre Residential Sites			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	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.		
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 	<p style="text-align: center;">0 / ++</p>	

	<p>opportunity to live in a decent and affordable home</p> <p>5. Maintain/support employment base</p> <p>6. Conserve/ enhance biodiversity and landscape</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>0</p> <p>++</p> <p>/</p> <p>++</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.	<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 and landscape</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>0</p> <p>/</p> <p>+</p> <p>+</p> <p>+</p> <p>0</p> <p>+</p> <p>/</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 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 with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
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	<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</p>	<p>0</p> <p>0</p> <p>++</p> <p>++</p> <p>0</p> <p>0</p>	

	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	++ ++ +	
	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 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 0 + + +	
	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 with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
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 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	++ 0 + ++ ++ 0 + 0 ++	

	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 with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
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.	<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;">0</p> <p style="text-align: center;">+?</p> <p style="text-align: center;">+</p> <p style="text-align: center;">+</p> <p style="text-align: center;">0</p> <p style="text-align: center;">+</p> <p style="text-align: center;">0</p> <p style="text-align: center;">+</p> <p style="text-align: center;">+</p>	
<p>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 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 with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>Option 1: To provide an appropriate mix of dwelling types and sizes to address local housing needs.</p> <p>A policy on future housing mix is considered necessary to ensure that new housing development addresses local need (as evidenced by the Strategic Housing Market Assessment) and the council plans for a mix of housing which is appropriate to the needs of the community, in terms of house type and size.</p>		
Option 1: To provide an appropriate mix of dwelling types and sizes to address local housing needs.	<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 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, 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 style="text-align: center;">0</p> <p style="text-align: center;">0</p> <p style="text-align: center;">0</p> <p style="text-align: center;">+</p> <p style="text-align: center;">0</p> <p style="text-align: center;">0</p> <p style="text-align: center;">0</p> <p style="text-align: center;">0</p> <p style="text-align: center;">+</p>	
<p>Commentary</p> <p>The application of such a policy, will have a positive impact on SA Objective 9 to promote</p>			

	mixed and balanced, more cohesive communities. The impact on SA 4 is also considered to be broadly positive in terms of increasing the opportunities for people to live in 'decent' homes which meet their lifestyle needs although it is recognised that this policy will not enable everyone to live in decent and affordable housing as identified in this objective. 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.		
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 borough.	0	
	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 with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
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 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	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	--	
	Commentary 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		

	<p>objectives listed.</p> <p>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.</p>		
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%).	<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>/</p> <p>/</p> <p>0</p> <p>0</p> <p>/</p>	
<p>Commentary</p> <p>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 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.</p>			
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</p> <p>0</p> <p>0</p> <p>+</p> <p>+</p> <p>0</p> <p>0</p> <p>0</p> <p>0</p> <p>+</p>	
<p>Commentary</p> <p>Option 3 is considered to represent a net positive in respect of objectives 4, 5 and 9 as a result of the provision of a greater amount of affordable housing when compared with Option 2.</p>			
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</p> <p>0</p> <p>0</p> <p>-</p> <p>-</p> <p>0</p> <p>0</p> <p>0</p> <p>0</p> <p>-</p>	
<p>Commentary</p> <p>Option 4 is considered to have net negative impacts on 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.</p>			
Option 5: Affordable Housing requirement with	<ol style="list-style-type: none"> 1. Minimise climate change 2. Adapt to climate change 	<p>0</p> <p>0</p>	

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%).	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	+	
Commentary: Option 5 is considered to have net positive impacts on 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 considered to 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) 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	0	
	7. Promote sustainable journeys	0	
	8. Provide sufficient infrastructure	0	
	9. Promote sustainable communities and Encourage active lifestyles	+	
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 objectives 4, 5 and 9.			
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	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	++	
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 objectives 4, 5, and 9.			
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	0	
	7. Promote sustainable journeys	0	
	8. Provide sufficient infrastructure	0	
	9. Promote sustainable communities and Encourage active lifestyles	++	

	active lifestyles		
	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 objectives 4, 5, and 9.		
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%).	<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>-</p> <p>-</p> <p>0</p> <p>0</p> <p>-</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.		

Policy H6: Build to Rent			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	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.		
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.	<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>0</p> <p>0</p> <p>++</p> <p>++</p> <p>0</p> <p>0</p> <p>0</p> <p>0</p> <p>++</p>	
	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.	<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 	<p>0</p> <p>0</p> <p>0</p> <p>+</p>	

	<p>decent and affordable home</p> <p>5. Maintain/support employment base +</p> <p>6. Conserve/ enhance biodiversity and landscape 0</p> <p>7. Reduce car journeys 0</p> <p>8. Ensure the provision of sufficient infrastructure 0</p> <p>9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles +</p>		
<p>Commentary</p> <p>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.</p>			

Policy H7: Self and Custom Build			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
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.	<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 and landscape 0</p> <p>7. Reduce car journeys 0</p> <p>8. Ensure the provision of sufficient infrastructure 0</p> <p>9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles +</p>		
<p>Commentary</p> <p>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.	<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 0</p> <p>6. Conserve/ enhance biodiversity and landscape 0</p>		

	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	0	
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.			

Policy H8: Gypsy, Traveller and Travelling Showpeople Sites

Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>Option 1: Criteria based 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 site would be designated for pitch provision to meet potential future accommodation needs of Gypsies and Travellers.	<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</p> <p>0</p> <p>?</p> <p>+</p> <p>0</p> <p>-</p> <p>0</p> <p>0</p> <p>+</p>	<p>Mitigation is required for SA Objective 6 as the allocation could have a negative effect on biodiversity/habitats.</p> <p>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>
Commentary			
<p>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.</p> <p>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 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>			
Option 2: Criteria based policies specific to	<ol style="list-style-type: none"> 1. Minimise climate change 2. Adapt to climate change 	<p>0</p> <p>0</p>	

<p>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>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 ?</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. The inclusion of caravan accommodation within the existing structure of the borough is likely to look different but not necessarily be damaging to the built environment. However, for this option, the reliance upon other more general policies within the Local Plan in relation to the character would mean that the Local Planning Authority would have less control over the design of potential site provision. The provision of pitches to meet the full accommodation needs of the GTTS community would provide a small number of affordable dwellings to meet a particular need. The impact of pitch provision may also impact the biodiversity in the borough if provided on certain sites. 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 sites would be designated for Gypsy and Traveller provision within the borough.</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 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.</p>			

Policy H9: Houses in Multiple Occupation			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option:	<p>Option 2: To restrict HMOs by criteria based on appropriate location, concentration, design and layout, impact on neighbouring amenity and privacy.</p> <p>There is continued pressure for Houses in Multiple Occupation 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 Occupation 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 +	
	<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 with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 1: Identify a green infrastructure network and opportunities for enhancement. Option 1 is the most suitable as it has the most positive effect of the sustainability objectives.		
Option 1: Identify a green infrastructure network and opportunities for enhancement.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities 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 is anticipated to have significant positive impacts on all of the SA/SEA Objectives, apart from 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 with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
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.	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 habitat and species surveys for the listed designated areas 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 2018 version provides the legislative requirement of habitat and species surveys being required for planning applications affecting areas listed under the Hierarchy of Biodiversity sites.		

Policy GI3: Biodiversity and Net Gain			
Policy Options	SA Objective with Significant Effect	Positive or Negative	Mitigation of Negative Impacts
Chosen Option	Option 1: To ensure a net gain in biodiversity. This is the most suitable option because biodiversity in England has been declining and becoming more fragmented. At least a 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. This can be achieved through the planting and maintenance of soft landscapes and trees.		
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 more fragmented. At least a 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. Movement towards the introduction of Pollination management plans further promotes increasing net gain and protection of wildlife.		
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 - -?	
	Commentary This policy approach protects what we already have but falls short of local and national ambitions to improve biodiversity as well as halt its loss.		

Policy GI4: Local Green Space

Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 1: Designate areas of particular importance to a local community. Option 1 is preferred as 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.		
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 ++ ++	
	Commentary This option provides significant benefit to the health and wellbeing of the local community. Ifield Brook Meadows and Ruser Road Playing Fields, the designated Local Green Space in Policy GI4, is a very special area for Crawley, designated as such due to its particular qualities in terms of nature, heritage, recreation, landscape, tranquillity and access to the wider countryside.		
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 ? -?	

Commentary

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 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 with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
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>			

<p>Option 3: Combine option 2 with a CO₂ emissions standard for new dwellings in advance of Building Regulations requirements, in the form of a 19% reduction in CO₂ emissions in comparison with Building Regulations requirements, while allowing scope for this to be superseded by stricter National requirements.</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;">++ ++ 0 ++ + +? 0 0 ++</p>	
<p>Commentary</p> <p>The requirement suggested in this option is equivalent to the CO₂ 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 CO₂ 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.</p>			
<p>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.</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;">++ ++ 0 ++ ++ +? 0 0 ++</p>	
<p>Commentary</p> <p>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.</p>			
<p>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.</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;">++ ++ +? ++ ++ +? 0 0 ++</p>	

	<p>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.</p>		
Option 6: Combine option 5 with a carbon offset fund, enabling developments to mitigate their emissions by contributing to the cost of other projects which will reduce CO ₂ emissions.	<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 Carbon offsetting is identified as a means of achieving very low net CO₂ emissions. In order to be effective, however, 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.</p>		
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.	<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 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.</p>		

Policy SDC2: District Energy Networks			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>Option 2: Include Local Plan policy with the council at the centre of network development 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.</p>		
Option 1: Have no policy in relation to sourcing energy efficiently.	<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>-? 0 0 -? 0</p>	

	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 NPPF asks for Local Authorities to “identify opportunities where development can draw its energy supply from decentralised, renewable or low carbon energy supply systems”. By not doing this the Plan wouldn’t be in conformity with national policy and would result in little/no policy support for such developments leaving it for the market alone to provide. More carbon intensive and expensive (for consumers) forms of energy would be more likely to be installed in the absence of district/ decentralised energy.</p>		
Option 2: Include Local Plan policy with the council at the centre of network development.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	++ 0 0 + + 0 0 + +? +?	
	<p>Commentary</p> <p>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.</p>		
Option 3: Include Local Plan policy encouraging the market to deliver network development.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+ 0 0 +? +? 0 0 +? +? +?	
	<p>Commentary</p> <p>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.</p>		

Policy SDC3: Tackling Water Stress			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option:	<p>Option 1: A Local Plan policy to mitigate the impact of development on the environment.</p> <p>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, and specific concerns about possible negative impacts on SAC, SPA and Ramsar designations that may be brought about as a result of groundwater abstraction</p>		

	at Hardham in Horsham District. The impacts of planned development can be mitigated through the Local Plan by including a policy requiring minimum water efficiency standards of 100l/p/d that is justified by local evidence. In doing so, this approach pro-actively addresses an 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 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 Crawley is situated in an area of serious water stress, and the Water Cycle Study (2020) strongly recommends that the Local Plan include policy to help mitigate the impact of development on the environment. This is particularly the case given concerns raised by the Environment Agency and Natural England about possible negative impacts on SAC, SPA and Ramsar designations that may be brought about as a result of groundwater abstraction at Hardham in Horsham District. 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 adopt a more ambitious local water standard of 100l/p/d, going beyond the tighter national requirements. 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, both of which are seeking a 'Target 100' standard on new development to help address the issues of water stress. Allowance has been made for any introduction of tighter nationally described standards. 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 plan. Therefore, Option 1 is the preferred approach.			
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.	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: 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 and ongoing supply uncertainty relating to the Hardham groundwater extraction, 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.			

Environmental Protection

Policy EP1: Development and Flood Risk			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	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 Objectives 2, 3, 6, 8, and 9.		
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 +	
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.			
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 + +	
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 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 objectives 2, 3, and 6.			

Policy EP2: Flood Risk Development Guidance			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
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	/ + 0 0 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 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 Quality			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 2: Develop a specific Local Plan policy to manage issues of 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	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment	++ ++ ++	

contamination.	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			
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 with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
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	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	--	
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	0	
	8. Provide sufficient infrastructure	0	
	9. Promote sustainable communities and Encourage active lifestyles	++	
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 with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>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.</p>		
<p>Option 1: Do not include a specific air quality policy in the Local Plan, instead relying on the guidance of the NPPF.</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;">+ + 0 0 0 + 0 0 +</p>	<p>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.</p>
<p>Option 2: Include a locally specific air quality policy in the Local Plan.</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;">++ ++ 0 0 0 ++ 0 0 ++</p>	<p>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.</p>

Policy EP6: External Lighting			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	Option 2: Develop a specific Local Plan policy to manage external lighting and issues of light pollution. It is considered that the Option 2 approach more readily enables the local planning authority to ensure development promotes the concepts of sustainable development, and is for this reason the preferred approach.		
Option 1: Rely on existing legislation to manage 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 +	
Commentary 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, and Option 1 is not therefore preferred.			
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 ++	
Commentary 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 therefore 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.			

Sustainable Transport

Policy ST1: Development and Requirements for Sustainable Transport			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	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		

	<p>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>		
<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>	<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 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>		
<p>Option 2: Do nothing locally and rely solely on the NPPF to promote sustainable transport.</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>Commentary</p> <p>Relying solely on the NPPF is considered to pose a risk of negative outcomes across a wide range of sustainability objectives. The NPPF (Paras 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</p>		

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 with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p>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.</p> <p>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.</p>		
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.	<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 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.</p>			
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.	<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. 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.</p>			

Policy ST3: Improving Rail Stations			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
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.	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	
<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: Safeguarding of a Search Corridor for a Crawley Western Link Road			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<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.</p> <p>All options are negative in their overall cumulative impact. The cumulative impact associated with options 1 and 4 are close to those of option 1, to the extent that these are considered to involve the lowest overall negative impact. In comparing options 1 and 4 meanwhile, option 4 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.</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.	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 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>		
<p>Option 2: Include a policy in respect of a western link road which sets out environmental and other criteria for how such a project should be designed and undertaken, but does not safeguard or identify a specific route.</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 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 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 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>		
<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 a project should be designed and undertaken.</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 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 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 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</p>		

	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.		
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	-		
	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 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.		

APPENDIX G: SUBMISSION LOCAL PLAN SITE ALLOCATIONS AND DESIGNATIONS

Assessment of Deliverable Key Housing Sites (Policy H2)

Site Name: Forge Wood Master Plan Area, Pound Hill

Site Potential Allocation: Neighbourhood including Housing, Neighbourhood Centre, Employment, Open Space and Infrastructure (1,900 total new homes; 1,038 homes outstanding)

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

Impacts of the Development:

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

SA Objective	Commentary and/or Impact
9. Promote Sustainable Communities and Encourage Active Lifestyles	The site is to be developed as a mixed use neighbourhood and comprises a range of related land uses including new neighbourhood centre, primary school and employment land. Whilst development of the site will result in the loss of open countryside and informal recreational space, the redevelopment of the site provides for large areas of planned open space including locally equipped areas of play, school playing fields, playing fields, cycle routes and allotments. Therefore, it is considered the approved layout and design of the new neighbourhood will fully encourage active lifestyles. Significant Positive Impact (++)
Conclusions	The site offers the opportunity to provide additional housing to meet the needs of the growing population of Crawley. It is an existing housing allocation which is currently substantially under construction, with the reserved matters for the final phases being considered in the planning process. The new neighbourhood will be well provided with new recreation/sports facilities. Additional areas of land outside the permitted 1,900 dwellings may come forward as 'windfall' opportunities. However, these would need to be assessed on a case-by-case basis and would be subject to meeting the outstanding infrastructure capacity constraints beyond that being addressed by the existing proposals and would need to be assessed against whether they remove areas of open space or visual amenity required by the permissions or place greater pressure on the neighbourhood's planned social and environmental assets, facilities and services. Development north of the 60dB noise contour associated with an additional runway to the south of the existing would be unacceptable.

Assessment of Deliverable Key Housing Sites (Policy H2)

Site Name: Zurich House, Southgate

Site Potential Allocation: Housing (44 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 (90 dwellings)

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

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The site represents previously developed land within the Built-Up Area. The site is sustainably located within walking distance to the Town Centre and Three Bridges Station. There are no known issues with regard to noise, air or water pollution at this stage. Positive Impact (+)
2. Adapt to Climate Change	The site is not within flood zone. Development would have to include suitable proposals for sustainable urban drainage in mitigation. Neutral Impact (/)
3. Protect and/or Enhance the Built Environment	The site is located within an established employment area. Development of this site would need to take into account the mixed character and appearance of the surrounding area, however, good quality design would enhance the quality of the built environment in this location. Positive Impact (+)
4. Decent/ Affordable Homes	Could offer approximately 90 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	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: 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: 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 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 started 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 (100 dwellings)

Site Description: The site comprises a vacant office building.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The site represents a sustainable location immediately to the south of the Town Centre. 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 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 (65 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 Key Housing and Open Space Sites (Policy H2)

Site Name: Henty Close, Bewbush

Site Potential Allocation: Housing and Open Space (24 homes, including re-provision of replacement play area)

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

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	Close to neighbourhood centre: sustainable location. Would allow pedestrian access to the new Kilnwood Vale neighbourhood. Sustainable design and construction. There are no known issues with land contamination or noise, air or water pollution. Positive Impact (+)
2. Adapt to Climate Change	Part of the site is within flood zone: development would have to design in open space to take account of this and reduce the risk of flooding elsewhere within the site and beyond the site. Would reduce permeable surfacing and increase significant increases in hard surface area, increasing surface water runoff. Development would have to include suitable proposals for sustainable urban drainage in mitigation. Possible Positive or Slight Positive Impact (+?)
3. Protect and/or Enhance the Built Environment	General residential area, new residential properties would be in-keeping with the location. Development of this site would alter the setting of the existing residential properties immediately adjacent to the site. However, good quality design could enhance the built environment and views to and from Kilnwood Vale. Possible Positive or Slight Positive Impact (+?)
4. Decent/ Affordable Homes	Could offer up to 24 new homes. Increasing the capacity of the town to meet some of the need emerging from the population. 40% affordable. Significant Positive Impact (++)
5. Maintain/ Support Employment	Provision of new housing is closely linked to supporting economic growth. Positive Impact (+)
6. Conserve/ Enhance Biodiversity and Landscape	Site is currently a play area with short mown grass and some shrubs. Biodiversity enhancements should be designed into any scheme. Possible Positive or Slight Positive Impact (+?)
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 24 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, within the existing Bewbush Neighbourhood, with access to the neighbourhood centre, schools, and local health facilities. The site would result in the loss of an existing small play area; the re-provision of the play area would form part of an acceptable scheme. The site is located close to the existing schools and local health facilities within Bewbush and Crawley town centre. Positive Impact (+)
Conclusions	Site offers the opportunity to provide additional housing to meet the needs of the growing population of Crawley. The site would also provide opportunities for enhancing the pedestrian and visual connectivity between Crawley and the new Kilnwood Vale neighbourhood.

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

Site Name: Rushetts Road Play Area, Langley Green

Site Potential Allocation: Housing and Open Space (14 homes, including re-provision of replacement play area)

Site Description: Existing play area: located in Langley Green. The site consists of a small children's play area and amenity space to the rear of existing residential properties.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	Close to neighbourhood centre: sustainable location. Sustainable design and construction. There are no known issues with land contamination or noise, air or water pollution. Positive Impact (+)
2. Adapt to Climate Change	Part of the site is within flood zone: development would have to design in open space to take account of this and reduce the risk of flooding elsewhere within the site and beyond the site. Would reduce permeable surfacing and increase significant increases in hard surface area, increasing surface water runoff. Development would have to include suitable proposals for sustainable urban drainage in mitigation. Possible Positive or Slight Positive Impact (+?)
3. Protect and/or Enhance the Built Environment	General residential area, new residential properties would be in-keeping with the location. Development of this site would alter the setting of the existing residential properties immediately adjacent to the site. However, good quality design could enhance the built environment. Possible Positive or Slight Positive Impact (+?)
4. Decent/ Affordable Homes	Could offer approximately 14 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 a play area with short mown grass and some shrubs. Biodiversity enhancements should be designed into 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 14 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, within Langley Green Neighbourhood, with access to the neighbourhood centre, schools, and local health facilities. The site would result in the loss of an existing small play area; the re-provision of the play area would form part of an acceptable scheme. The site is located close to the existing schools and local health facilities within Langley Green. Positive Impact (+)
Conclusions	Site offers the opportunity to provide additional housing to meet the needs of the growing population of Crawley. The site would also provide opportunities for enhancing the open space.

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

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

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

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 (Policy 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 (Policy 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 (Policy H2 and TC3)

Site Name: County Buildings, Northgate

Site Potential Allocation: Main Town Centre Uses or Mixed Use Development for Housing (100 dwellings) and Main Town Centre Uses and/or Town Centre Neighbourhood Facilities

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

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The site represents a 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 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, 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 (Policy 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) 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 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 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 (Policy H2 and TC3)

Site Name: Crawley College, Three Bridges

Site Potential Allocation: Education/Main Town Centre Uses/Mixed Use with Housing (500 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 (Policy H2 and TC3)

Site Name: Cross Keys

Site Potential Allocation: Main Town Centre Uses/Mixed Use with Housing (20 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 (Policy 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 Site (Policy H2)

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

Potential Site Allocation: Housing (150 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 150 new homes, significantly increasing the capacity of the town to meet some of the need emerging from the population. 40% affordable. Significant Positive Impact (++)
5. Maintain/ Support Employment	The rest of the neighbourhood contains local employment provision linked both to the neighbourhood centre and bespoke provision to support economic growth. 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 Lifestyles	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 cycle routes. It is considered the approved layout and design of the new neighbourhood will fully encourage active lifestyles.

SA Objective	Commentary and/or Impact
	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

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).

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 (I)
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 (I)
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

	<p>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.</p>
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Assessment of Developable Key Housing Sites (Policy H2)

Site Name: Land adjacent to Desmond Anderson School, Tilgate

Site Potential Allocation: Housing (150 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 (112 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 Rejected Housing Sites

Name: Land north of Langley Walk

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

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	The area's location, although just outside the BUAB, is in relatively close proximity to local schools, a GP surgery and other community facilities such as Langley Parade. This will reduce the need to travel by car substantially. Since the land is adjacent to the urban area, both pedestrian networks and public transport are readily accessible. However, the site is located within the 60 -dBA noise contour for a second runway at Gatwick Airport and is therefore unacceptable for residential use based on the currently predicted contours. 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. Significant Negative 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 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: 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 Sustainable Journeys	The northern and eastern parts of Tilgate Country Park are adjacent to the Tilgate, Furnace Green and Maidenbower neighbourhoods so some areas of the site could be accessible to local facilities on foot, or cycle. A bus route also runs through the northern edge of the

SA Objective	Commentary and/or Impact
	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 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 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: Hazelwood, Balcombe Road, Pound Hill

Site Potential Allocation: Housing

Site Description: the site comprises a single detached dwelling house in a large plot.

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 protected by a Tree Preservation Order; any removal of trees would have a significant negative impact on the visual appearance of this location. 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 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. Unknown 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 level of tree cover and the TPO makes this site unsuitable for residential 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 Potential Areas of Search for Housing

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 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

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 accommodating caravans. Significant Negative 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, 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

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 providing mitigation against flood and surface water run-off from elsewhere in the urban area. The protection of the site as local green space also provides continued protection for the habitats already valued in the area for nature conservation importance. 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 (I)
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

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

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

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

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

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

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 (Policy 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, Nexus (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 also defined as 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. Through continuing to identify Manor Royal as a Main Employment Area, the Local Plan retains the historic operation and location of the new town industrial estate, whilst setting in place policy mechanisms to promote sustainable development. Significant Positive Impact ++
2. Adapt to Climate Change	The business district has potential to be utilised as a decentralised energy network that will allow for a low carbon technology. 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 Crawley'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. 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 development of housing within the area. However, with regard to the quality of housing provision, housing would be an inappropriate use within the Main Employment Area, with operational business uses 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 business uses. There is pressing need to sustain the business-led economic function of Manor Royal, as both a key employment location for residents of Crawley and those of the wider sub-region, particularly given the constrained employment land supply position. By losing economic floorspace to housing, the economic function of the Main Employment Area, and consequently that of the town and potentially the wider sub-region, would be undermined. This may potentially negatively affect the ability for people to work and afford housing. Therefore retention of the economic function at the expense of housing has a wider sustainability benefit. In this regard, continued identification of Manor Royal as a Main Employment Area is considered to have a neutral impact against this objective. Neutral /

SA Objective	Commentary and/or Impact
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 uses 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 therefore 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 as an area to be opened up through the development of the adjacent site at Principal Park, designation of Crawter's Brook as a people's park, and the new pocket park at the junction of London Road and Manor Royal. The use of the Manor Royal Design Guide SPD support policies EC1-EC3 further, with regard to improving the soft landscaping of the area. Positive Impact +
7. Promote Sustainable Journeys	Manor Royal is located in close proximity to a sustainable range of transport links other than the 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 the retention of the area as a main employment area supports sustainable traffic movements. New and ongoing projects with the Crawley Growth Programme, continue to make sustainable journeys 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, 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, in close proximity to the town allow residents the ability to up-skill and access a myriad of opportunities in the workplace. The in-commuting that occurs from neighbouring authorities also demonstrates a wider and more integrated community base for the area. 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, ideally in the form of a dedicated business hub, will support 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 as a business destination. 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. Housing development is encouraged in the Town Centre where this would add to its overall vitality and viability, either as mixed use redevelopment or as conversions of the upper floors of existing retail premises.

Site Description: Crawley Town Centre is the main shopping and leisure area in the borough, and is a key visitor destination for the wider sub-region. It contains a good range of shops, restaurants, cafes, and bars, as well as entertainment uses at Crawley Leisure Park. The Town Centre contains a number of development sites, which are allocated in the Local Plan for mixed-use development comprising residential and Main Town Centre Uses. The residential population of the Town Centre has grown significantly in recent years; 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. The Town Centre is also defined as an Opportunity Area which promotes opportunity for the development of a district energy network, and asks new development to consider the options of link to or creating a network. For these reasons, the Town Centre is recognised as a highly sustainable location for economic development and housing. Significant Positive Impact ++
2. Adapt to Climate Change	The Town Centre has the potential to be utilised as a decentralised energy network that will allow for a low carbon technology. It is located within Flood Zone 1 (low probability), though some areas are subject to risk from surface water flooding. It benefits from a range of sustainable transport links, including Crawley Railway and Bus Stations, both of which are programmed for improvement in the early part of the Plan period. The re-intensification of using existing land will also minimise resource use and supports employment clusters and urban land forms which are resilient to climate change. Positive Impact +
3. Protect and/or Enhance the Built Environment	Identification of the Town Centre as a Main Employment Area, and the allocation of specific sites at Town Centre and Edge-of-Centre locations for mixed use development presents an opportunity to enhance the overall setting of the built environment through good design and the bringing into use of underutilised or vacant sites. Further, through designating the Town Centre as an employment site, the Local Plan continues to recognise the established commercial character of the Town Centre. Positive Impact +
4. Decent/ Affordable Homes	The Town Centre has been identified as a Main Employment Area, but the Local Plan also recognises it as a sustainable location for residential development. Although housing does not represent economic development, designation of the Town Centre as a Main Employment Area will not prejudice the delivery of residential development as these are expressly encouraged in the Town Centre through the Policy. It is also recognised that the allocation of specific Town Centre locations for mixed use development may encourage the delivery of both housing and economic uses. For these reasons, it is considered that allocation of the Town Centre as a Main Employment Area will have an uncertain, and potentially positive, impact on the delivery of decent affordable homes. Possible Positive or Slight Positive Impact +?
5. Maintain/ Support Employment	The designations and allocations ensure that the employment function of the Town Centre is retained, and that opportunities are maximised to promote and deliver sustainable economic growth through the promotion of sustainably located Main Town Centre uses. Significant Positive Impact ++
6. Conserve/ Enhance Biodiversity	Crawley Town Centre is predominantly urban in character. The Memorial Gardens represent a key open space asset, and are designated in the Local Plan as a Historic Park & Garden meaning that the area will be protected from inappropriate development.

SA Objective	Commentary and/or Impact
and Landscape	Although development within the Town Centre will be encouraged to promote biodiversity through good design and landscaping, it is not considered that allocation of the Town Centre as a Main Employment Area will result in an impact on biodiversity. No Impact 0
7. Promote Sustainable Journeys	The Town Centre represents a highly sustainable location for employment and residential development, providing immediate access to facilities, services, and public transport links. Through balancing and assessing housing and employment growth, and promoting mixed-use development in the Town Centre, the Local Plan will help enable the town to be cohesive and its residents to travel locally to work, accessing a wide variety of opportunities. Significant Positive Impact ++
8. Provide Sufficient Infrastructure	The Town Centre currently benefits from excellent existing infrastructure, and planned improvements to Crawley Railway and Bus Stations will support this further. The Local Plan also identifies a specific policy that supports the provision of new infrastructure to support 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 a number of commercial leisure uses and also the Memorial Gardens, both of which promote access to active lifestyles. A sustainable central location and immediate proximity to transport links creates a wider opportunity for Town Centre developments to link with leisure facilities and areas. Through identifying the Town Centre as a Main Employment Area, whilst also promoting sustainably located residential development, the Local Plan will continue to encourage the promotion of active lifestyles through the planning process. Positive Impact +
Conclusions	Crawley Town Centre represents a highly sustainable location for economic growth and should continue to be supported as the 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 70 mppa by 2032 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 in vacant offices at the airport provided this does not impact on the ability of the airport to meet its operational needs. This will help ensure that best use is made of the available floorspace at the airport whilst also ensuring additional land is not required for operational uses. The use of existing employment floorspace at the airport will have a minimal effect on pollution as staff can benefit from 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. Through the Local Plan, there is opportunity to utilise a decentralised energy network, and benefits from good access to sustainable public transport for staff working on-airport. The airport 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 this is 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	Housing is not an appropriate use at the airport because of the noise impact. No Impact 0
5. Maintain/ Support Employment	There is an emphasis on airport related uses at the airport which specifically require an airport location for operational, safety or functional reasons, with flexibility provided to allow the non-airport related employment where this would not compromise the ability of the airport to meet its operational needs. This will enable the safe and efficient operation of the airport as well as enable other employment uses to use vacant floorspace. Significant Positive Impact ++
6. Conserve/ Enhance Biodiversity and	Although the airport is predominately built up, the airport 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

SA Objective	Commentary and/or Impact
Landscape	designation. No Impact 0
7. Promote Sustainable Journeys	The airport is a highly accessible location by sustainable surface transport, particularly train and bus. It 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. Positive Impact +
8. Provide Sufficient Infrastructure	Employment uses at the airport make efficient use of existing infrastructure. The policy would not require the provision of additional infrastructure. Neutral Impact /
9. Promote Sustainable Communities 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. 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 will 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 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. In maintaining the corridor as a Main Employment Area, the Local Plan makes use of 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. Continued identification of Three Bridges Corridor as a Main Employment Area will not itself specifically bring about the adaptation of the area to climate change. No Impact 0
3. Protect and/or Enhance the Built Environment	Three Bridges Corridor performs an important local function in providing accommodation for smaller-scale employment, enabling the clustering of similar uses of light industrial, office, trade, and automotive. Continued identification of Three Bridges Corridor as a main employment area provides the market with a greater choice of accommodation, and therefore reduces the need for 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 an uncertain, but potentially positive, impact. Possible Positive or Slight Positive Impact +?
4. Decent/Affordable Homes	Three Bridges Corridor performs an important local function in providing accommodation for smaller-scale employment uses, enabling the clustering of similar uses of light industrial, office, trade, and automotive. 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. 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 operational business uses 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 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. Therefore retention of the economic function at the expense of housing has a wider sustainability benefit. In this regard, continued identification of Three Bridges Corridor as a Main Employment Area is 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 ++

SA Objective	Commentary and/or 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. Whilst access by private vehicle will be a consideration moving forward, the site is sustainably located and accessible by sustainable transport modes. Positive Impact +
8. Provide Sufficient Infrastructure	Three Bridges Corridor is already served by a range of transport modes including train, bus, bicycle, and by private vehicle. It does not contain an extensive range of facilities to support employees and businesses, 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. The location as a Main Employment Area that should be protected against non-employment generating development is necessary and appropriate.

Assessment of Employment Sites (Policy EC1-EC3)

Site Name: Maidenbower Business Park

Site 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 also 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 and will help to ensure that this function is retained. Weighing up the above considerations, its allocation as a Main Employment Area is considered to be neutral against this objective. Neutral Impact /
2. Adapt to Climate Change	The site falls within Flood Zone 1 (low probability), though small areas of the site are at risk of surface water flooding. Continued identification of Maidenbower Business Park as a Main Employment Area will not itself specifically bring about the adaptation of the area to climate change. No Impact 0
3. Protect and/or Enhance the Built Environment	The designation of Maidenbower 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. In this regard, continued identification of Maidenbower Business Park for employment use is viewed as having an uncertain, but potentially positive, impact. Possible Positive or Slight Positive Impact +?
4. Decent/ Affordable Homes	The 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. 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 operational business uses 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 employment uses. There is need to sustain the economic function of the Business Park as a key employment location for residents of Crawley particularly given the constrained employment land supply position. By losing economic floorspace to housing, the economic function of the Main Employment Area, and consequently that of the town and potentially the wider sub-region, would be undermined. This may potentially negatively affect the ability for people to work and afford housing. Therefore retention of the economic function at the expense of housing has a wider sustainability benefit. In this regard, continued identification of Maidenbower Business Park as a Main Employment Area is considered to have a neutral impact against this objective. 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

SA Objective	Commentary and/or Impact
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 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
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 designation of Maidenbower Business Park as a Main Employment Area would impact 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. Weighing up the above considerations, the designation of Tilgate Forest Business Park as a Main Employment Area is considered to be neutral against this objective. Neutral Impact /
2. Adapt to Climate Change	The site falls within Flood Zone 1 (low probability), though small areas of the site are at risk of surface water flooding. Continued identification of Tilgate Forest Business Park as a Main Employment Area will not itself specifically bring about the adaptation of the area to climate change. No Impact 0
3. Protect and/or Enhance the Built Environment	The designation of Tilgate Forest 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. In this regard, identification of Tilgate Forest Business Park for employment use is viewed as having an uncertain, but potentially positive, impact. Possible Positive or Slight Positive Impact +?
4. Decent/ Affordable Homes	The 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. 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 operational business uses 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 employment uses. There is pressing need to sustain the business-led economic function of the site as both a key employment location for residents of Crawley, particularly given the constrained employment land supply position. By losing economic floorspace to housing, the economic function of the Main Employment Area, and consequently that of the town and potentially the wider sub-region, would be undermined. This may potentially negatively affect the ability for people to work and afford housing. 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. 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 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. Weighing up the above considerations, in particular 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 the 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 somewhat 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 make use of the existing location. The site is located at the 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. Continued identification of Broadfield Business Park as a Main Employment Area will not itself specifically bring about the adaptation of the area to climate change. No Impact 0
3. Protect and/or Enhance the Built Environment	Identification of Broadfield Business Park as a Main Employment Area provides the market with a 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, the retained designation of Broadfield Business Park for employment use is viewed as having an uncertain, but potentially positive, impact. Possible Positive or Slight Positive Impact +?
4. Decent/ Affordable Homes	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 the remaining business operating from the park and deter further inappropriate residential development. However, it is recognised that the incursion of residential has significantly undermined the employment function of this location. Possible Positive or Slight Positive 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 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. 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. Therefore, although the park is situated close to an area of biodiversity and landscaping, given that this is an established use, its identification as a Main Employment Area will not impact upon the objective to enhance biodiversity and landscape. No Impact 0

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 formal identification as a Main Employment Area will not itself deliver significant infrastructure though the limited scope for intensification means that significant further infrastructure is unlikely to be required to serve the site. 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 identification 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 B class uses, and 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 land identified through the North Crawley Area Action Plan.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Mitigate Climate Change & Local Pollution	Lowfield Heath provides an established employment offer, and its identification as a Main Employment Area will continue to make use of the site for economic use, providing sustainability benefits through clustering employment uses within an identified area. The site is not 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 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. 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 therefore reduces the need for employment uses to consider locating in less appropriate areas where there could be scope for a negative impact on the character of the built environment. In this regard, identification of Lowfield Heath for employment use is viewed as having an uncertain, but potentially positive, impact. Possible Positive or Slight Positive Impact +?
4. Decent/ Affordable Homes	The designation of Lowfield Heath as a Main Employment Area will not directly deliver decent/affordable homes. However, housing would be an inappropriate use within the Main Employment Area, as operational business uses have significant scope to impact upon the amenity of residents, and the presence of residential use would constrain and undermine the economic function of the Main Employment Area, including for existing and future business uses. There is pressing need to sustain the supply of employment land in Crawley, and the loss of employment land or floorspace to other uses would undermine the economic function of the Main Employment Area, Crawley, and the wider sub-region. Therefore, 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, given the lack of accessibility of this site to nearby neighbourhoods, and the presence of noise associated with Gatwick Airport, the site is particularly unsuitable for residential use. In contributing to the overall choice of established business destinations in Crawley, the employment designation of this site will help balance the demands of employment and housing. For this reason, continued designation of Lowfield Heath for employment use is viewed as having an uncertain, but potentially positive, impact. 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. Significant

SA Objective	Commentary and/or Impact
	Positive Impact ++
6. Conserve/ Enhance Biodiversity and Landscape	Lowfield Heath is situated beyond Crawley's Built up Area Boundary adjacent to the southern boundary of Gatwick Airport. Although the site would therefore be considered to represent a countryside location, the employment use is well-established and the location represents a brownfield site. It is not considered that formal identification of the existing economic use as a Main Employment Area would impact upon the objective to enhance biodiversity and landscape. No Impact 0
7. Promote Sustainable Journeys	Identification of Lowfield Heath as a Main Employment Area will maintain the existing economic function of the site. The site is not accessible from Crawley's neighbourhoods on foot, with bus and private car representing key means of access. Both this, and a relative absence of facilities or services to support employees, potentially increases the need to travel. However, given that the site is already established as an economic location, it is not considered that the formal identification of Lowfield Heath as a Main Employment Area would impact on this indicator. No Impact 0
8. Provide Sufficient Infrastructure	Given the existing function of the site and limited scope for intensification, the formal identification of Lowfield Heath as a Main Employment Area will not itself necessitate or deliver significant infrastructure. Neutral Impact /
9. Promote Sustainable Communities 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 location beyond the Built up Area Boundary potentially increases the need to travel by private car. The site does not itself provide significant facilities or services to support employees, potentially increasing the need to travel. However, given that the site is already established as an economic destination, it is not considered that its formal 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 provides leisure focussed employment that contributes to the local economy.

Site Description: Broadfield Stadium and K2 are situated in the south of Crawley, largely separate from Crawley's urban area. The sites sit opposite one another either side of Brighton Road (A23), adjacent to Broadfield Business Park and 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. Through designating it as a Main Employment Area the site will continue to retain a key economic role. Mitigation is provided through the benefits of clustering employment uses within an identified area. K2 has an existing Combined Heat and Power plant and is located within an District Energy Network Priority Area with the nearby Desmond Anderson site. The site is accessible by bus and private vehicle. Its formal identification as a Main Employment Area will help protect it as a leisure focussed employment location, and is considered to be marginally positive against this criteria. 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. 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 Network Priority Area should improve the provision of sustainable energy. Possible Positive Impact +
3. Protect and/or Enhance the Built Environment	Continued use of the area for leisure led employment use will not impact upon the built environment. 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. In this regard, continued identification of Broadfield Stadium and K2 Crawley 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, employment generating development at these locations will be supported. Identification as a Main Employment Area with a particular focus on leisure will help Crawley accommodate its leisure needs, and enables a greater focus on employment uses, protecting these locations for economic development to help ensure that employment needs can be accommodated over the Plan period. Significant Positive Impact ++
6. Conserve/ Enhance Biodiversity and Landscape	Although there is limited scope for intensification within the site boundary, formal identification of the site as a Main Employment Area will help to retain the existing employment function of the site within its current curtilage. 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

SA Objective	Commentary and/or Impact
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 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. Neutral Impact /
8. Provide Sufficient Infrastructure	Given the existing function of the site and limited scope for intensification, the formal identification of Broadfield Stadium/K2 quarter as a Main Employment Area will not itself necessitate or deliver significant infrastructure. Neutral Impact /
9. Promote Sustainable Communities 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 therefore the retention and protection of the area should be significantly positive. Significant Positive Impact ++
Conclusions	Identification of the Broadfield Stadium/K2 quarter as a Main Employment Area will help to protect the valuable leisure function of this site. In doing so, the site contributes to the overall economic vitality of Crawley, and provides significant sustainability benefits.

Assessment of Employment Sites (Policy EC1-EC3)

Site Name: The Hawth Theatre

Site Potential Designation: Main Employment Area. An arts, culture and entertainment complex. It is a focus for creative and cultural uses in Crawley, and 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 may not fully mitigate against the impacts of climate change and local pollution, it will not exacerbate these impacts further, and therefore its impact is considered to be marginally positive against this objective. Possible Positive or Slight Positive Impact +?
2. Adapt to Climate Change	The site is situated in Flood Zone 1 (low probability), with only small pockets of the site at risk of surface water flooding. Identification as a Main Employment Area will not itself specifically bring about the adaptation of the area to climate change. No Impact 0
3. Protect and/or Enhance the Built Environment	The 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. In this regard, continued use of the area for employment use is viewed as having an uncertain, but potentially positive, impact. Possible Positive or Slight Positive Impact +?
4. Decent/ Affordable Homes	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. 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 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. Positive Impact +
6. Conserve/ Enhance Biodiversity and Landscape	Although there is only limited scope for intensification within the site boundary, formal identification of the site as a Main Employment Area will help retain the existing leisure function of the site within its current curtilage. 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 can be accessed from some Crawley neighbourhoods on foot, though bus and private car represent key means of access. The site does not itself provide facilities or services to support employees, other than those that exist on site, potentially increasing the need to travel. Weighing up the above considerations, in particular that the site already operates as an established leisure location, it is not considered that identification of The Hawth as a Main Employment Area would impact against this objective. No Impact 0
8. Provide Sufficient Infrastructure	Given the existing function of the site and limited scope for intensification, formal identification of The Hawth as a 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	<p>Whilst situated within the urban area, 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 and this will continue to have a negative impact in climate change mitigation terms. 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. Weighing up the above, it is considered that the overall impact of the site against this objective is considered to be positive.</p> <p>Positive Impact +</p>
Conclusions	<p>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.</p>

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 47 ha 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 the only available site that is of a sufficient scale and location to deliver the quantum of required industrial and warehouse floorspace 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 more efficiently to increase capacity where there is a demonstrable need for on-airport car parking, including through the use of multi-storey car parks and robotic car parking. Given the significant 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 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. New strategic employment development would involve a loss of countryside land, and would potentially increase the need to travel to access new jobs. Other sites promoted through the Local Plan process may have been more sustainable, for example sites adjacent to the existing Manor Royal main employment area, 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 a southern runway, road diversions and other operational uses. The site is, however, located close to Gatwick Airport main employment area and the Horley Strategic Business Park allocation (RBBC). As such there is scope to maximise access via sustainable transport links. The greenfield nature of Gatwick Green site provides scope to further mitigate climate change impacts, presenting the opportunity for highly sustainable new built development. On this basis, although it is recognised that the development of greenfield land can potentially have a negative impact in terms of climate change and local pollution, and that other promoted sites may be more sustainably located, the Gatwick Green site is the only one that is of a sufficient scale that is able to come forward without prejudicing safeguarding, and the development itself could provide opportunities to offset this impact, making it the most sustainable of the available options. It is uncertain what the impact would be on this indicator. Uncertain Impact ?
2. Adapt to Climate Change	Identification of a Strategic Employment Location that is well connected to existing Main Employment Areas, represents the most sustainable option. Other sites promoted through the Local Plan process may be in potentially more sustainable locations, for example sites adjacent to the existing Manor Royal main employment area, 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 a southern runway, road diversions and other operational uses. The Gatwick Green site is however located close to Gatwick Airport main employment area and the office-led Horley Strategic Business Park allocation (RBBC). 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

SA Objective	Commentary and/or Impact
	would bring an area of greenfield land into development, though strategic level new build could itself be designed to a highly sustainable standard in order to facilitate adaptation to climate change. On this basis it is considered that development could offer scope to respond positively to climate change through the planning process. Possible Positive Impact +?
3. Protect and/or Enhance the Built Environment	There is significant 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 can only be accommodated within a Strategic Employment Location. The site is adjacent to listed buildings at Donkey Lane and Fernhill Road and to a locally listed building at Rivington Farm. Local Plan policy will require that the principles of good design, appropriate landscaping and screening are adhered to and the settings of these buildings protected and enhanced. Any 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. Therefore, it is considered that the allocated site could contribute positively against this objective. Possible Positive Impact +?
4. Decent/ Affordable Homes	The identification of main employment areas as employment destinations will not directly deliver decent/affordable homes. However, a Strategic Employment Location at Gatwick Green will help the 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 wholly unsuitable for residential use due to the impact of aircraft noise. For this reason, the allocated site is viewed as having an uncertain, but potentially positive impact against this indicator. Possible Positive Impact +?
5. Maintain/ Support Employment	The allocation of an industrial and warehouse-led Strategic Employment Location at Gatwick Green will help address what is a significant and long-standing need for new employment land in Crawley. This would be expected to 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. 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 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 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. Development of the site will need to comply with future 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. Negative Impact -
7. Promote Sustainable Journeys	Industrial and warehouse-led strategic employment development at Gatwick Green would create jobs and therefore increases the need to travel. It is possible that other sites promoted for employment, particularly those adjoining Manor Royal, may have represented an increased opportunity to promote sustainable journeys. The Gatwick Green site is however located close to Gatwick Airport main employment area and the Horley Strategic Business Park allocation (RBBC). The scale of the development creates the opportunity to improve sustainable transport options to access the site. 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 travel and also the need to access already busy routes through Crawley and Manor Royal, potentially adding to the sustainability of the site. Possible Positive Impact +?

SA Objective	Commentary and/or Impact
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 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. 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 possible opportunities to reinforce links 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. Strategic Employment Development would therefore be well placed to perform positively against this indicator. Possible Positive Impact +?
Conclusions	As a standalone site for a Strategic Employment Location, Gatwick Green will help to meet the industrial and warehouse-led business land needs of Crawley as a sub-regional employment destination, representing a sustainable location for strategic employment growth in Crawley. It is the only one of the promoted sites that would deliver the required quantum of industrial and employment land that is capable of being delivered without prejudicing the requirement to safeguard land for a potential southern runway at Gatwick Airport. Whilst there may be a negative impact on landscape, it is considered that the scale of the allocation is such that biodiversity net gain should be achievable on site. The allocation would enable sustainable, high quality new development to complement and deliver linkages with the existing residential and business communities.

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 Sites. The Site contains two listed buildings, namely Rowley Farmhouse (Grade II*) and Crown Post Barn (Grade II). 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. 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 potentially increase the need to travel to access new jobs. However, the site is situated immediately to the north and west of Manor Royal, 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 greenfield nature of the site provides scope to further mitigate climate change impacts, presenting the opportunity for highly sustainable new built development. On this basis, although it is recognised that the development of greenfield land can potentially have a negative impact in terms of climate change and local pollution, the site would provide strategic employment land in a location that forms a natural extension to Manor Royal, whilst providing opportunities to maximise sustainable design and access. Uncertain 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 existing sustainable transport links, and a strategic level new build could be designed to a highly sustainable standard in order to facilitate adaptation to climate change. On this basis it is considered that development could offer scope to respond positively to climate change through the planning process. 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. Possible Positive Impact +?
3. Protect and/or Enhance the Built Environment	There is significant 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 can only 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. Impact on listed buildings and their setting would need to be carefully considered. This site is located on rising ground and forms a key visual break 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

SA Objective	Commentary and/or Impact
	avoid a negative impact on the setting of the built up area. Uncertain Impact
4. Decent/ Affordable Homes	The identification of main employment areas as employment destinations will not directly deliver decent/affordable homes. However, the allocation of a Strategic Employment Location will help the Plan to balance the demands of employment and housing whilst working within the confines of Crawley's limited land supply. For this reason, the allocation of a Strategic Employment Location is viewed as having an uncertain, but potentially positive impact against this indicator. Possible Positive Impact +?
5. Maintain/ Support Employment	The allocation of an industrial and warehouse-led Strategic Employment Location would help address what is a significant and 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. 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. There is risk that development at this location could impact negatively on the visual gap between Manor Royal and Gatwick Airport, an impact 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 create jobs and therefore increase 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. 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 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, and given that 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. Uncertain Impact?
9. Promote Sustainable Communities and encourage active lifestyles.	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 also possible 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 therefore be well placed to perform positively against this indicator. Possible 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

SA Objective	Commentary and/or Impact
	<p>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. 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.</p>

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, with much of the site located north of Hydehurst Lane, and 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. New strategic employment development at this site would involve a loss of countryside land, and would potentially increase the need to travel to access new jobs. However, the site is situated immediately to the north of Manor Royal, and could form an extension to the existing main employment area. In turn, this could present opportunities to maximise and enhance existing sustainable transport infrastructure that supports Manor Royal. The greenfield nature of the site provides scope to mitigate climate change impacts through sustainable new built development. However, given the scale of Crawley's employment floorspace needs, it is unlikely that the site is of a sufficient scale to accommodate the quantum of floorspace required for a Strategic Employment Location, meaning that a further site or sites may need to be identified. This may reduce the scope to mitigate climate change and pollution on a comprehensive basis, and potentially increases the need to travel between sites. Uncertain 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. 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, there are opportunities to utilise and enhance existing sustainable transport links, and development could offer scope to respond positively to climate change through the planning process. 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). Small areas of the site are subject to risk of surface water flooding. The site is not of a sufficient area to accommodate all the employment needs identified, potentially reducing the sustainability benefits that could be achieved through a strategic level employment development, and would likely necessitate the identification of additional sites to meet Crawley's employment needs. Possible Positive Impact +?
3. Protect and/or Enhance the Built Environment	There is significant 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 can only be accommodated within a Strategic Employment Location, a level of growth that cannot be accommodated on this site alone. 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. Impact on listed buildings and their setting would need to be carefully considered. It is therefore

SA Objective	Commentary and/or Impact
	considered that whilst development at this site could contribute positively against this objective, it is recognised that further sites would need to be identified to meet Crawley's employment land needs in full. Possible Positive Impact +?
4. Decent/ Affordable Homes	The identification of main employment areas as employment destinations will not directly deliver decent/affordable homes. Allocation of a Strategic Employment Location will help the Plan to balance the demands of employment and housing whilst working within the confines of Crawley's limited land supply, though it is recognised that this site would not be of a sufficient area to accommodate the quantum of employment floorspace that is needed, leaving need to identify further employment sites elsewhere. For this reason, the allocation of the site for employment use is viewed as having an uncertain, but potentially positive impact against this indicator. Possible Positive Impact +?
5. Maintain/ Support Employment	Identification of this site for employment use would add to the available supply pipeline of employment land, though it would not support the delivery of a Strategic Employment Location that is capable of meeting all the identified floorspace requirements on a comprehensive basis. This would mean that a further site or sites would need to be identified to meet Crawley's employment needs in full. Further, given its location within the safeguarded area and on land that forms part of the physical land take for a potential southern runway, allocation of this site would prejudice delivery of a southern runway should this be required. Positive Impact +
6. Conserve/ Enhance Biodiversity and Landscape	The site is subject to environmental designations, with Rowley Wood, an area of ancient semi-natural woodland and Local Wildlife Site adjoining 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. As a smaller site that is not of a strategic level, it is possible that the impacts arising from this site could, if carefully managed, be less than in other areas. However, not being of a strategic scale, there may be fewer opportunities to mitigate impacts on biodiversity or provide compensation, as could be achieved at a Strategic Employment Location. 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. Further, the level of growth provided would meet only a proportion of Crawley's unmet employment land needs, potentially necessitating the identification of an additional site or sites, which may result in greater negative impacts than would be the case for a single site. Negative Impact -
7. Promote Sustainable Journeys	Industrial and warehouse-led employment development would create jobs and therefore increase 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 Impact +?
8. Provide Sufficient Infrastructure	Given that the site would not be of the scale required for the Strategic Employment Location, it is uncertain whether development would be of a sufficient critical mass to maximise the opportunity for a wider provision of infrastructure. The site cannot be allocated due to the requirement to retain safeguarding, and 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. Uncertain 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 link ages with the bus, pedestrian and cycle network, whilst offering scope to contribute to the encouragement of healthy lifestyles through the design process. Possible Positive Impact +
Conclusions	The promoted site would not be of a sufficient size and scale to accommodate all the identified industrial and warehouse-led needs in a single Strategic Employment Location, and would not therefore be capable of meeting Crawley's employment land requirements on a

SA Objective	Commentary and/or Impact
	<p>comprehensive basis, potentially necessitating the need to identify additional sites. Its location adjoining Manor Royal would form an 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 required to be 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.</p>

Site Name: Land at Jersey Farm (Sites B and C)

Site Potential Designation: Industrial (Class B2) and Warehouse (Class B8) led Strategic Employment Location

Site Description: Land at Jersey Farm Site B (2.18ha) and Site C (8.77ha) are promoted by Vail Williams on behalf of Ardmore. The sites are promoted for industrial and/or storage & distribution use on an individual site basis, and also on a collective basis (total 23.6ha) through Vail Williams representation, alongside Land at Little Dell Farm (Sites A, B and C), Land at Poles Lane (Sites A and B), and Land at Spikemead Farm.

The Jersey Farm sites are 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. Site B is situated outside of the safeguarded land, to the west of the permitted scheme at Jersey Farm Site A, and extends west into the countryside. Site C is located immediately to the north of Sites A and B, and is subject to a small area of Flood Zone 2 along its western boundary.

Site C 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 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 although they are located adjacent to County Oak and Manor Royal, in extending westwards from the existing main employment area, potentially increase the need to travel to access new jobs. The greenfield nature of the sites provides some scope to mitigate climate change impacts through sustainable new build development. Uncertain Impact (?)
2. Adapt to Climate Change	Identification of employment land that is well connected to existing Main Employment Areas represents a sustainable option. The sites are located within proximity to County Oak and Manor Royal, though in extending development further westwards do not represent as logical an extension to Manor Royal as some other sites, potentially increasing the need to travel to access new jobs. There may be opportunities to utilise and enhance existing sustainable transport links, and development could offer scope to respond positively to climate change through the planning process. Site C is subject to a small area of Flood Zone 2 along its western boundary, with a larger area at risk of surface water flooding. However, the sites are not of themselves sufficient in area to accommodate a Strategic Employment Location, potentially reducing the sustainability benefits that could be achieved, and would likely necessitate the identification of additional sites to meet Crawley's employment needs. Part of Site C is subject to flood risk, which is likely to increase as a result of climate change. Uncertain Impact (?)
3. Protect and/or Enhance the Built Environment	There is significant 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 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. Employment development, particularly at Site B, 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. Development at this site could possibly contribute positively against this objective, however it is recognised that further sites would also need to be identified to meet Crawley's employment land needs in full. Uncertain Impact (?)
4. Decent/ Affordable Homes	The identification of main employment areas as employment destinations will not directly deliver decent/affordable homes. Allocation of a Strategic Employment Location will however help the Plan to balance the demands of employment and housing whilst working within

SA Objective	Commentary and/or Impact
	the confines of Crawley's limited land supply. For this reason, the allocation of the sites for employment use is viewed as having an uncertain, but potentially positive impact against this indicator. Possible Positive Impact +?
5. Maintain/ Support Employment	Identification of the Sites B and C for employment use would add to the available supply pipeline of employment land, though would not, particularly as a result of constraints posed by the safeguarded location of Site C and its companion sites, support delivery of a Strategic Employment Location that is capable of meeting the identified floorspace requirements on a comprehensive basis. This would mean that a further site or sites would need to be identified to meet Crawley's employment needs in full. Land at Jersey Farm Site B (2.18ha) would be capable of adding to the employment land supply pipeline, though is not of a sufficient quantum to accommodate identified needs alone, and does not on a standalone basis represent a logical extension to Manor Royal. Therefore, although allocation of these sites would help to meet some of Crawley's significant business land needs, Site C (and companion sites) are on land that is required to be safeguarded, whilst development of Land at Jersey Farm Site B does not represent a logical extension to Manor Royal nor does it provide a sufficient quantum of land take that would outweigh wider impacts considered in the SA. Positive Impact +
6. Conserve/ Enhance Biodiversity and Landscape	The sites are not subject to specific environmental designations, though are situated within the countryside and fall within the Upper Mole Farmlands Rural Fringe landscape character area. Development of the sites for employment use could have a negative impact on biodiversity, landscape features, flora and fauna. As a series of smaller sites that collectively are not of a strategic level, it is possible that the impacts arising from development could, if carefully managed, be lesser than in other areas, particularly given the absence of environmental designations. However, not being of a strategic scale, there may be fewer opportunities to mitigate impacts on biodiversity or provide compensation, as could be achieved at a Strategic Employment Location. Development of the sites would need to comply with future requirements to deliver Biodiversity Net Gain, presenting the opportunity to enhance habitats and landscape features. Furthermore, development on these sites would result in significant incursion into the countryside, both westwards and along the frontage onto London Road, resulting in a significant urbanising effect. The level of growth provided would meet only a proportion of Crawley's unmet employment land needs, potentially necessitating identification of an additional site or sites, which may result in greater negative impacts than would be the case for a single site. 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. Negative Impact -
7. Promote Sustainable Journeys	Industrial and warehouse-led employment development would create jobs and therefore increase the need to travel. The proximity of the sites to the periphery of Manor Royal may represent an opportunity to link into existing sustainable transport networks to promote sustainable journeys, but this may be challenging as the sites extend westwards away from London Road. 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. Possible Negative Impact -?
8. Provide Sufficient Infrastructure	The sites would not be of the scale required to accommodate a Strategic Employment Location, and it is uncertain therefore if a sufficient critical mass could be achieved to maximise opportunities for a wider provision of infrastructure. It is possible that development would exacerbate existing traffic congestion at County Oak and would significantly increase commercial traffic on the rural road network. Site C cannot be allocated due to the requirement to retain safeguarding, and is located on land that is needed for a southern runway and 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. Possible 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. Site C is subject to flood risk that is anticipated to increase as a result of climate change. The presence of employment development, particularly at Site B, 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. Possible Negative Impact -?

SA Objective	Commentary and/or Impact
Conclusions	<p>The promoted sites are 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 County Oak, the location would be somewhat peripheral to the heart of Manor Royal, and the sites do not represent as logical an extension to the main employment area as is the case for other promoted sites. Although the sites would appear to be 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. Critically, Site C is located on land that is safeguarded for a possible southern runway at Gatwick Airport, being situated on land that is directly required for the 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. Therefore the sites are unable to meet Crawley's employment needs on an individual or collective basis. Land at Jersey Farm Site B, whilst outside of safeguarding, does not represent a logical extension to Manor Royal, and is likely to result in a negative impact on the countryside were it to come forward on a standalone basis, with the scale of employment that could be accommodated unlikely to outweigh the negative impact.</p>

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 are promoted individually, and also on a collective basis alongside the Jersey Farm sites, Land at Poles Lane (Sites A and B), and Land at Spikemead Farm, for flexible business use.

The sites are located to the north of County Oak and Astral Towers and close to London Road, in a countryside location beyond the Built-up Area Boundary that falls within the Upper Mole Farmlands Rural Fringe landscape character area. The sites are located within Flood Zone 1 (low probability), though the northern part of Site A is subject to risk of surface water flooding. The sites are 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 sites are situated beyond the Built up Area Boundary in a countryside location, though are more isolated from County Oak and Manor Royal than other promoted sites, potentially increasing the need to travel to access new jobs. The greenfield nature of the sites provides scope to mitigate climate change impacts through sustainable new built development. However, given the scale of Crawley's employment floorspace needs, the sites, even when taken collectively, are not of sufficient scale to accommodate the quantum of floorspace required for a Strategic Employment Location, meaning that a further site or sites may need to be identified. This reduces the scope to mitigate climate change and pollution on a comprehensive basis, and potentially increases the need to travel between sites. Uncertain 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. The sites are located within proximity to County Oak and Manor Royal, though do not represent as logical an extension to Manor Royal as some other sites. There may be opportunities to utilise and enhance existing sustainable transport links, and development could offer scope to respond positively to climate change through the planning process. The sites are located within Flood Zone 1 (low probability), though the northern part of Site A is subject to risk of surface water flooding. However, the sites are not of a sufficient area to accommodate a Strategic Employment Location, potentially reducing the sustainability benefits that could be achieved, and would likely necessitate the identification of additional sites to meet Crawley's employment needs. Uncertain Impact (?)
3. Protect and/or Enhance the Built Environment	There is significant 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 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. Impact on listed building at County Oak Lane and its setting would need to be carefully considered. Development at this site could possibly contribute positively against this objective, however, it is recognised that further sites would also need to be identified to meet Crawley's employment land needs in full. Possible Positive Impact +?
4. Decent/ Affordable Homes	The identification of main employment areas as employment destinations will not directly deliver decent/affordable homes. Allocation of a Strategic Employment Location will help the Plan to balance the demands of employment and housing whilst working within the confines of Crawley's limited land supply, though it is recognised that the sites would not be of a sufficient area to accommodate the quantum of employment floorspace that is needed, leaving need to identify further employment sites elsewhere. For this reason, the allocation of the sites for employment use is viewed as having an uncertain, but potentially positive impact against this indicator.

SA Objective	Commentary and/or Impact
	Possible Positive Impact +?
5. Maintain/ Support Employment	Identification of the sites for employment use would add to the available supply pipeline of employment land, though it would not support the delivery of a Strategic Employment Location that is capable of meeting the identified floorspace requirements on a comprehensive basis. This would mean that a further site or sites would need to be identified to meet Crawley's employment needs in full. Further, given the location of the majority of Site A, and Sites B and C in their entirety within the safeguarded area on land that forms part of the physical land take for a potential southern runway and operational uses, allocation of these sites would prejudice delivery of a southern runway should this be required. This would mean that only a small area of Site A could be allocated, and although this would be capable of adding to the employment land supply pipeline, it is not of a sufficient quantum to accommodate identified needs. Therefore, although allocation of these sites would help to meet some of Crawley's significant business land needs, the majority of the sites fall on land that is required to be safeguarded, and do not therefore provide a sufficient quantum of land take that would outweigh wider impacts considered in the SA. Positive Impact +
6. Conserve/ Enhance Biodiversity and Landscape	The sites are not subject to specific environmental designations, though are situated within the countryside and fall within the Upper Mole Farmlands Rural Fringe landscape character area. Development of the sites for employment use could have a negative impact on biodiversity, landscape features, flora and fauna. As a series of smaller sites that collectively are not of a strategic level, it is possible that the impacts arising from development could, if carefully managed, be less than in other areas, particularly given the absence of environmental designations. However, not being of a strategic scale, there may also be fewer opportunities to mitigate impacts on biodiversity or provide compensation, as could be achieved at a Strategic Employment Location. Development of the sites would in any event need to comply with future requirements to deliver Biodiversity Net Gain, presenting the opportunity to enhance habitats and landscape features. Furthermore, development on these sites would result in an incursion into the countryside, both westwards and along the frontage onto London Road, resulting in an urbanising effect. Given that the level of growth provided would meet only a proportion of Crawley's unmet employment land needs, this potentially necessitates identification of an additional site or sites, which may result in greater negative impacts than would be the case for a single site. Negative Impact -
7. Promote Sustainable Journeys	Industrial and warehouse-led employment development would create jobs and therefore increase the need to travel. The proximity of the sites to the periphery of Manor Royal may represent an opportunity to link into existing sustainable transport networks to promote sustainable journeys, but this may be challenging as the sites extend westwards away from London Road. Given the industrial and warehouse-led nature of employment need, it is possible that the location of the site close to County Oak will impact upon what are already busy routes through Crawley and Manor Royal. Possible Negative Impact -?
8. Provide Sufficient Infrastructure	The sites would not be of the scale required to accommodate a Strategic Employment Location, and it is uncertain therefore if a sufficient critical mass could be achieved to maximise opportunities for a wider provision of infrastructure. It is possible that development would exacerbate existing traffic congestion at County Oak and would significantly increase commercial traffic on the rural road network. The sites cannot be allocated due to the requirement to retain safeguarding, and is located on land that is needed for the physical land take of a southern runway 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. Possible 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 presence of employment development in these locations 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 Negative Impact -?
Conclusions	The promoted sites are 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,

SA Objective	Commentary and/or Impact
	<p>potentially necessitating the need to identify additional sites. Although the sites are located adjacent to Manor Royal and County Oak, the location is somewhat peripheral in nature and the sites do not represent as logical an extension to the main employment area as is the case for other promoted sites. Although the sites would appear to be subject to fewer environmental designations that 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 sites are in the main 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 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. Whilst a small part of Site A is situated outside of safeguarding, this area will not meet Crawley's strategic employment needs on a standalone basis, necessitating the identification of an additional site or sites.</p>

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 as follows: Site A (1.43ha) on behalf of Maxwell; 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 are located to the north of Land at Jersey Farm Site C and west of Land at Little Dell Farm Site B, in countryside beyond the Built-up Area Boundary that falls within the Upper Mole Farmlands Rural Fringe landscape character area. Two Listed Buildings border Site A and are located close to Site B. The sites are 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 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 somewhat isolated from Manor Royal and County Oak, increasing the need to travel to access new jobs. The greenfield nature of the sites provides scope to mitigate climate change impacts through sustainable new built development. However, given the scale of Crawley’s employment floorspace needs, the sites, even when taken collectively, are not of sufficient scale to accommodate the quantum of floorspace required for a Strategic Employment Location, meaning that a further site or sites may need to be identified. This reduces the scope to mitigate climate change and pollution on a comprehensive basis, and potentially increases the need to travel between sites. 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 the other sites promoted by Vail Williams, would be somewhat isolated from Manor Royal and County Oak, increasing the need to travel to access new jobs. There may be opportunities to utilise and enhance existing sustainable transport links, and development could offer scope to respond positively to climate change through the planning process. The sites are located within Flood Zone 1 (low probability), though areas of both sites are subject to risk of surface water flooding. The sites are not of a sufficient area to accommodate a Strategic Employment Location, potentially reducing the sustainability benefits that could be achieved, and would therefore necessitate the identification of additional sites to meet Crawley’s employment needs. It is recognised that some of the sites are subject to flood risk, which is likely to increase as a result of climate change. Negative Impact -
3. Protect and/or Enhance the Built Environment	There is significant demand for additional business land and floorspace to meet identified business needs. The Local Plan sets out 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 can only be accommodated within a Strategic Employment Location, a level of growth that cannot be accommodated on these sites, therefore necessitating the identification of additional site(s). 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. Impact on nearby listed buildings and their setting would need to be carefully considered. Although development at this site could contribute positively against this objective, it is recognised that further sites would need to be identified to meet Crawley’s employment land needs in full. Possible Positive Impact +?
4. Decent/ Affordable Homes	The identification of main employment areas as employment destinations will not directly deliver decent/affordable homes. Allocation of a Strategic Employment Location will help the Plan to balance the demands of employment and housing whilst working within the confines of Crawley’s limited land supply, though it is recognised that the sites would not be of a sufficient area to accommodate the

SA Objective	Commentary and/or Impact
	<p>quantum of employment floorspace that is needed, leaving need to identify further employment sites elsewhere. For this reason, allocation of the sites for employment use is viewed as having an uncertain, but potentially positive impact against this indicator.</p> <p>Possible Positive Impact +?</p>
5. Maintain/ Support Employment	<p>Identification of the sites for employment use would add to the available supply pipeline of employment land, though it would not support the delivery of a Strategic Employment Location that is capable of meeting the identified floorspace requirements on a comprehensive basis. This would mean that a further site or sites would need to be identified to meet Crawley's employment needs in full. Further, given the location of these sites within the safeguarded area on land that forms part of the physical land take for a potential southern runway and operational uses, allocation of these sites would prejudice delivery of a southern runway should this be required. Although allocation of these sites would help to meet some of Crawley's significant business land needs, the sites are on land that is required to be safeguarded, and do not therefore provide a sufficient quantum of land take that would outweigh wider impacts considered in the SA.</p> <p>Positive Impact +</p>
6. Conserve/ Enhance Biodiversity and Landscape	<p>The sites are not subject to specific environmental designations, though are situated within the countryside and fall within the Upper Mole Farmlands Rural Fringe landscape character area. Development of the sites for employment use could have a negative impact on biodiversity, landscape features, flora and fauna. It is possible that the impacts arising from development could, if carefully managed, be less than for other promoted sites, particularly given the absence of environmental designations, though not being of a strategic scale, there may be fewer opportunities to mitigate impacts on biodiversity or provide compensation, as could be achieved at a Strategic Employment Location. Development of the sites would in any event need to comply with future requirements to deliver Biodiversity Net Gain, presenting the opportunity to enhance habitats and landscape features. Development on these sites, given their separation from Manor Royal, would result in an incursion into the countryside, resulting in an urbanising effect. Given that the level of growth provided would meet only a small proportion of Crawley's unmet employment land needs, this would necessitates identification of additional site(s), which may result in greater negative impacts than would be the case for a single site. Negative Impact -</p>
7. Promote Sustainable Journeys	<p>Industrial and warehouse-led employment development would create jobs and therefore increase the need to travel. The proximity of the sites to the periphery of Manor Royal may represent an opportunity to link into existing sustainable transport networks to promote sustainable journeys, but this may be challenging as the sites extend westwards away from London Road. Given the industrial and warehouse-led nature of employment need, it is possible that the location of the site close to County Oak or accessing directly onto London Road will impact upon what are already busy routes through Crawley and Manor Royal. The proximity of rural road networks to potentially access sites could result in a significant intensification of commercial traffic. Negative Impact -</p>
8. Provide Sufficient Infrastructure	<p>The sites would not be of the scale required to accommodate a Strategic Employment Location, and it is uncertain therefore if a sufficient critical mass could be achieved to maximise opportunities for a wider provision of infrastructure. It is possible that development would exacerbate existing traffic congestion at County Oak and would significantly increase commercial traffic on the rural road network. The sites cannot be allocated due to the requirement to retain safeguarding, and is located on land that is needed for the physical land take of a southern runway 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. Uncertain Impact (/)</p>
9. Promote Sustainable Communities and encourage active lifestyles.	<p>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. Significant Negative Impact --</p>
Conclusions	<p>The promoted sites are 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,</p>

SA Objective	Commentary and/or Impact
	<p>potentially necessitating the need to identify additional sites. Although the sites are located within proximity of Manor Royal, they are separate from the main employment area to its north, and also do not front onto London Road to the east. Although the sites would appear to be subject to fewer environmental designations that is the case for other sites, there would be an impact on landscape character due to the urbanising effect development this 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>

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 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. 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, new employment development would increase the need to travel to access new jobs. The greenfield nature of the site provides scope to mitigate climate change impacts through sustainable new built development. However, given the scale of Crawley's employment floorspace needs, is not of sufficient scale to accommodate the quantum of floorspace required for a Strategic Employment Location, meaning that further sites may need to be identified. This reduces the scope to mitigate climate change and pollution on a comprehensive basis, and potentially increases the need to travel between sites. 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, new employment development would increase the need to travel to access new jobs. 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 greenfield nature of the sites provides scope to mitigate climate change impacts through sustainable new built development. However, given the scale of Crawley's employment floorspace needs, is not of sufficient scale to accommodate the quantum of floorspace required for a Strategic Employment Location, meaning that further sites may need to be identified. This reduces the scope to mitigate climate change and pollution on a comprehensive basis, and potentially increases the need to travel between sites. The site is significantly affected by Flood Zones 2 and 3, with flood risk likely to be exacerbated due to the impacts of climate change. Negative Impact -
3. Protect and/or Enhance the Built Environment	There is significant 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 can only be accommodated within a Strategic Employment Location, a level of growth that cannot be accommodated on this site. 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 Listed Spikemead Farmhouse Buildings borders the site, and impact on listed building and its setting would need to be carefully considered. It is considered that whilst development at this site could contribute positively against this objective, it is recognised that further sites would need to be identified to meet Crawley's employment land needs in full. Possible Positive Impact +?
4. Decent/ Affordable Homes	The identification of main employment areas as employment destinations will not directly deliver decent/affordable homes. Allocation of a Strategic Employment Location will help the Plan to balance the demands of employment and housing whilst working within the confines of Crawley's limited land supply, though it is recognised that the sites would not be of a sufficient area to accommodate the

SA Objective	Commentary and/or Impact
	<p>quantum of employment floorspace that is needed, leaving need to identify further employment sites elsewhere. For this reason, the allocation of the sites for employment use is viewed as having an uncertain, but potentially positive impact against this indicator.</p> <p>Possible Positive Impact +?</p>
5. Maintain/ Support Employment	<p>Identification of the site for employment use would add to the available supply pipeline of employment land, though it would not support the delivery of a Strategic Employment Location that is capable of meeting the identified floorspace requirements on a comprehensive basis. This would mean that a further site or sites would need to be identified to meet Crawley's employment needs in full. The site is also isolated from other main employment areas, having only a limited relationship 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. Therefore, although allocation of this site would help to meet some of Crawley's significant business land needs, it cannot be allocated as a result of the requirement for safeguarding, and given its isolated location it would have only a limited relationship with Crawley's designated main employment areas. Possible Positive Impact +?</p>
6. Conserve/ Enhance Biodiversity and Landscape	<p>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. Development for employment use could have a negative impact on biodiversity, landscape features, flora and fauna, and also the role of the site as a functional floodplain. It is possible that the impacts arising from development could, if carefully managed, be lesser than in other areas, given the absence of environmental designations. However, not being of a strategic scale, there may be fewer opportunities to mitigate impacts on biodiversity or provide compensation, as could be achieved at a Strategic Employment Location. Development would in any event need to comply with future requirements to deliver Biodiversity Net Gain, presenting the opportunity to enhance habitats and landscape features. Development of the sites, particularly given its isolated countryside location, would result in an incursion into the countryside, resulting in an urbanising effect. Given that the level of growth provided would meet only a proportion of Crawley's unmet employment land needs, this potentially necessitates identification of an additional sites, which may result in greater negative impacts than would be the case for a single site. Development of this particular site on a standalone basis would be likely to have an impact on the countryside setting, given that it would protrude significantly into the countryside beyond Manor Royal. Negative Impact -</p>
7. Promote Sustainable Journeys	<p>Industrial and warehouse-led employment development would create jobs and therefore increase the need to travel. Land at Spikemead Farm in particular is isolated in a countryside location, and is likely to place pressure on the rural road 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 --</p>
8. Provide Sufficient Infrastructure	<p>The site would not be of the scale required to accommodate a Strategic Employment Location, and it is uncertain therefore if a sufficient critical mass could be achieved to maximise opportunities for a wider provision of infrastructure. It is possible that development would exacerbate existing traffic congestion and would significantly increase commercial traffic on the rural road network. The site cannot be allocated due to the requirement to retain safeguarding, and 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. Negative Impact -</p>
9. Promote Sustainable Communities and encourage active lifestyles.	<p>Employment development at this isolated site is likely to increase the need to travel by private vehicle. The site would result in significant incursion into the countryside and would place development in an area of flood risk. Significant Negative Impact --</p>

SA Objective	Commentary and/or Impact
Conclusions	<p>The promoted 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, its urbanising effect on the countryside, the impacts of employment development are likely to be significant. 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.</p>

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 Land at Little Dell Farm Site A, close to London Road, in a countryside location beyond the Built-up Area Boundary. It falls within the Upper Mole Farmlands Rural Fringe landscape character area. The site is located within Flood Zone 1 (low probability) though a significant part of the site is subject to risk of surface water flooding. 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 situated some way to the north of Manor Royal main employment area, to the south of the as yet undeveloped (though technically commenced) Southways office development and does not represent a logical extension to the existing designated main employment area. The site is accessible by public transport, and has direct access onto the A23, although this may encourage access by private vehicle. The greenfield nature of the site provides scope to mitigate climate change impacts through sustainable new built development. Given the scale of Crawley's employment floorspace needs, the site is not of sufficient scale to accommodate the quantum of floorspace required for a Strategic Employment Location, meaning that a further site or sites may need to be identified. This reduces the scope to mitigate climate change and pollution on a comprehensive basis, and potentially increases the need to travel between sites. Uncertain Impact (?)
2. Adapt to Climate Change	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 situated some way to the north of Manor Royal main employment area, to the south of the as yet undeveloped (though technically commenced) Southways office development and does not represent a logical extension to the existing designated main employment area. The site is accessible by public transport, and has direct access onto the A23, although this may encourage access by private vehicle. The site is located within Flood Zone 1 (low probability) though a significant part of the site is subject to risk of surface water flooding. The greenfield nature of the site provides scope to mitigate climate change impacts through sustainable new built development. Given the scale of Crawley's employment floorspace needs, the site is not of sufficient scale to accommodate the quantum of floorspace required for a Strategic Employment Location, meaning that a further site or sites may need to be identified. This reduces the scope to mitigate climate change and pollution on a comprehensive basis, and potentially increases the need to travel between sites. Uncertain Impact (?)
3. Protect and/or Enhance the Built Environment	There is significant 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 can only be accommodated within a Strategic Employment Location, a level of growth that cannot be accommodated on this site. 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. It is considered that whilst development at this site could contribute positively against this objective, it is recognised that further sites would need to be identified to meet Crawley's employment land needs in full. Possible Positive Impact +?
4. Decent/ Affordable Homes	The identification of main employment areas as employment destinations will not directly deliver decent/affordable homes. Allocation of a Strategic Employment Location will help the Plan to balance the demands of employment and housing whilst working within the

SA Objective	Commentary and/or Impact
	confines of Crawley's limited land supply, though it is recognised that the sites would not be of a sufficient area to accommodate the quantum of employment floorspace that is needed, leaving need to identify further employment sites elsewhere. For this reason, the allocation of the sites for employment use is viewed as having an uncertain, but potentially positive impact against this indicator. Possible Positive Impact +?
5. Maintain/ Support Employment	Identification of the site for employment use would add to the available supply pipeline of employment land, though it would not support the delivery of a Strategic Employment Location that is capable of meeting the identified floorspace requirements on a comprehensive basis. This would mean that a further site or sites would need to be identified to meet Crawley's employment needs in full. Given the location of the sites on safeguarded 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. Therefore, although allocation of the site would help to meet some of Crawley's significant business land needs, it is located on land that is required to be safeguarded. Positive Impact +
6. Conserve/ Enhance Biodiversity and Landscape	The site is not subject to specific environmental designations, though it is situated within the countryside and falls within the Upper Mole Farmlands Rural Fringe landscape character area. Development of the site for employment use could have a negative impact on biodiversity, landscape features, flora and fauna. As a smaller site that is not of a strategic level, it is possible that the impacts arising from development could, if carefully managed, be lesser than in other areas, particularly given the absence of environmental designations. However, not being of a strategic scale, there may also be fewer opportunities to mitigate impacts on biodiversity or provide compensation, as could be achieved at a Strategic Employment Location. Development of the site would in any event need to comply with future requirements to deliver Biodiversity Net Gain, presenting the opportunity to enhance habitats and landscape features. Furthermore, development on this site would result in significant incursion into the countryside, both westwards and along the frontage onto London Road, resulting in a significant urbanising effect. Given that the level of growth provided would meet only a proportion of Crawley's unmet employment land needs, this potentially necessitates the identification of an additional site or sites, which may result in greater negative impacts than would be the case for a single site. Negative Impact -
7. Promote Sustainable Journeys	Industrial and warehouse-led employment development would create jobs and therefore increase 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. Possible Negative Impact -?
8. Provide Sufficient Infrastructure	The site would not be of the scale required to accommodate a Strategic Employment Location, and it is uncertain therefore if a sufficient critical mass could be achieved to maximise opportunities for a wider provision of infrastructure. It is possible that development would exacerbate existing traffic congestion around County Oak. The site cannot be allocated due to the requirement to retain safeguarding, and is located on land that is needed for the physical land take of a southern runway 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. Possible 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 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 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 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

SA Objective	Commentary and/or Impact
	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.

Name: East of Brighton Road

Site Potential Allocation: Employment

Description: Countryside location. 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. 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 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 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) though small areas are subject to risk of surface water flooding. Significant Negative Impact (--)
3. Protect and/or Enhance the Built Environment	Allocation of the site as a Main Employment Area would provide the market with a greater choice of commercial locations. However, the area forms an important element of the town's structural landscaping and provides an attractive setting for the southern neighbourhoods. Long distance views towards the area from various viewpoints within the built up area, as protected by Local Plan Policy CL7, would be adversely affected by development. Therefore, the high value of the contribution this area makes to the surrounding built environment would outweigh the benefits of any employment generating development. In this regard, identification of East of Brighton Road is viewed as having a negative impact. Negative Impact (-)
4. Decent/ Affordable Homes	The identification of main employment areas as employment destinations will not directly deliver decent/affordable homes. However, the allocation of a Strategic Employment Location will help the Plan to balance the demands of employment and housing whilst working within the confines of Crawley's limited land supply. For this reason, the allocation of a Strategic Employment Location is viewed as having an uncertain, but potentially positive impact against this indicator. Possible Positive Impact +?
5. Maintain/ Support Employment	East of Brighton Road is adjacent to Tilgate Forest Business Park which is one of several sites identified as a Main Employment Area in the Local Plan. Extensions of this Business Park for employment generating development would help address unmet need currently identified in the Plan. Significant Positive Impact (++)
6. Conserve/ Enhance Biodiversity and Landscape	East of Brighton Road is situated outside the Built-Up Area Boundary, within an area of countryside and mature woodland, including particularly 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 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, therefore, it is likely that car access would be dominant, and its location adjacent to the strategic road network means in-commuting by car is likely to be encouraged. If the site did not itself provide facilities or services to support employees, this would

SA Objective	Commentary and/or Impact
	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. Uncertain Impact (?)
9. Promote Sustainable Communities and Encourage Active Lifestyles	Identification of East of Brighton Road as a Main Employment Area would enhance the existing economic function of the town, but at the expense of a significant greenspace with important environmental features. The majority of the area is not easily accessible from Crawley's neighbourhoods on foot, and private car represents the most likely means of access. The site is unlikely to provide facilities or services to support employees, potentially increasing the need to travel, and given that access may be off the main external road network this may support a wider catchment than the town and increase in-commuting. 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 constraints of the site, and its separation from Crawley's main economic focus of Manor Royal, the Town Centre and Gatwick Airport, 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 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, at the scale of employment required, to be a sustainable form of development.

Assessment of Rejected 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 in submission Local Plan Policy CH9, it is largely separate from Crawley's urban area. The land abuts the Tilgate Forest Business Park to the west, the M23 to the east at its junction with the A264.

Impacts of the Development

SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	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 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. Development is likely to adversely affect the important role the lake and its floodplain forms in the Upper Mole Flood Alleviation Scheme. Significant Negative Impact (--)
3. Protect and/or Enhance the Built Environment	The allocation of Tilgate Country Park as a Main Employment Area could provide the market with a greater choice of locations. However, the area forms an important element of the town's structural landscaping and provides an attractive setting for the southern neighbourhoods. Long distance views towards the area from various viewpoints within the built up area, as protected by submission Local Plan Policy CH8, would be adversely affected by development. There are also a few historic buildings within the area that are important in the historic parkland and are protected as part of the Local Plan. Therefore, the high value of the contribution this area makes to the surrounding built environment would outweigh the benefits of any employment generating development. Significant Negative Impact (--)
4. Decent/ Affordable Homes	The identification of main employment areas as employment destinations will not directly deliver decent/affordable homes. However, the allocation of a Strategic Employment Location will help the Plan to balance the demands of employment and housing whilst working within the confines of Crawley's limited land supply. For this reason, the allocation of a Strategic Employment Location is viewed as having an uncertain, but potentially positive impact against this indicator. Possible Positive Impact +?
5. Maintain/ Support Employment	Tilgate Country Park is adjacent to Tilgate Forest Business Park. This is one of several sites identified as a Main Employment Area in the Local Plan. Extensions of this Business Park for employment generating development would help address unmet need currently identified in the Plan. Significant Positive Impact (++)
6. Conserve/ Enhance Biodiversity and Landscape	Tilgate Country Park is situated outside the Built-Up Area Boundary, within an area of countryside and mature woodland, including areas of ancient woodland. It is identified as an area of Structural Landscaping, and is designated as 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

SA Objective	Commentary and/or 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 not accessible from Crawley's neighbourhoods on foot, and bus. Main access to any development would be from the A23 or M23 and, therefore, it is likely that car access would be dominant, and its location adjacent to the strategic road network means in-commuting by car is likely to be encouraged. If the site did not itself provide facilities or services to support employees, this would also potentially increase the need to travel. Significant Negative Impact (--)
8. Provide Sufficient Infrastructure	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 although the scale of the site is such that it could come forward. Uncertain Impact (?)
9. Promote Sustainable Communities and Encourage Active Lifestyles	Identification of Tilgate Country Park as a Main Employment Area will enhance the existing economic function of the town, but at the expense of significant greenspace that is the most important outdoor recreational space in the borough, as well as including important environmental features and historic buildings. The majority of the area is not accessible from Crawley's neighbourhoods on foot, and private car represents the most likely means of access, increasing the need to travel. The site's location adjacent to the strategic road network may support a wider catchment and increase in-commuting to the borough. Tilgate Country Park is one of the most important recreational assets in the borough, with facilities including a golf course, driving range, Go Ape, watersports, extensive walking and running routes, cycle and mountain bike routes, bridleways, nature centre and an outdoor gym. It is also in close proximity to the K2 Crawley leisure centre, Broadfield Stadium pitches and the wider countryside in the AONB to the south. Its development would undermine the encouragement of active lifestyles. Significant Negative Impact (--)
Conclusions	Given the constraints of the site, and its separation from Crawley's main economic focus of Manor Royal, the Town Centre and Gatwick Airport, 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 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, at the scale of employment required, to be a sustainable form of development.