

# Crawley Borough Local Plan Review PAS Toolkit 4 Local Plan Soundness Quality Assessment July 2023

	<b>KEY QUESTIONS</b>	<p style="text-align: center;"><b>Assessment</b></p> <p style="text-align: center;"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
<b>Growth Strategy</b>		
<b>A</b>	<p><b>In no more than 100 words (excluding any referencing) summarise your strategy for delivering growth and development in your area</b></p>	<p>Crawley is physically constrained reducing opportunities for growth. It faces the challenge of incorporating additional and higher residential density development within our existing neighbourhoods and within the town centre. The Local Plan also seeks to consider if other land within the borough can come forward appropriately to help meet all identified needs. The Local Plan aims to manage this change to ensure much of the housing and employment needs of our growing population can be met within the borough’s boundaries whilst retaining the important character and features of the town which our residents, businesses and visitors value. The Plan’s policies seek to secure high quality of design, with new development providing decent and affordable new homes and attractive workspaces whilst protecting the amenity and wellbeing of existing residents. It also aims to ensure new development is sustainable in location and construction, adapts to a changing climate by moving towards carbon neutrality and reducing water use, and promotes public transport, cycling and walking.</p>
<b>B</b>	<p><b>In no more than 100 words (excluding any referencing) identify the key factors which informed the distribution of development in the local plan policies update</b></p>	<p>The key factors informing the distribution of development within the borough include the following constraints:</p> <ul style="list-style-type: none"> <li>• Borough Boundaries and Built Up Area Boundary</li> <li>• Safeguarding</li> <li>• Compact Development – distance from sustainable transport</li> <li>• Open Space and nature environmental constraints</li> <li>• Flooding</li> <li>• Noise</li> <li>• Main Employment Areas</li> <li>• Town Centre</li> <li>• Viability</li> <li>• Character and Heritage</li> </ul>

		<b>Assessment</b>				
<b>KEY QUESTIONS</b>		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		<ul style="list-style-type: none"> <li>Aerodrome Safeguarding</li> </ul> <p>Opportunities for maximising development in particular areas, include the town’s New Town sustainable neighbourhood approach and the opportunities within the Town Centre where active frontages can be maintained.</p>				
<b>C</b>	<b>List each of the main growth areas and strategic sites and the key infrastructure needed to support delivery</b>	<p>The main growth areas within Crawley’s administrative boundaries, as reflected in the Local Plan are:</p> <ul style="list-style-type: none"> <li>Town Centre</li> <li>Forge Wood</li> <li>Gatwick Green</li> <li>Key Housing Sites</li> <li>Main Employment Areas</li> </ul> <p>Key Infrastructure requirements are set out in the Infrastructure Plan. These include:</p> <ul style="list-style-type: none"> <li>Strategic and Local Highway Improvements</li> <li>Expansion of Secondary Education</li> <li>Local Cycling and Walking improvements</li> </ul>				
<b>1.</b>	<b>Overall does the local plan policies update clearly articulate the strategy for <u>where</u> and <u>how</u> sustainable development will be delivered and that this is ‘an appropriate strategy’ within the context of paragraph 35 of the NPPF?</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p><b>Reason for score: +2</b></p> <p>The Crawley Borough Local Plan clearly articulates the strategy for where and how sustainable development will be delivered over the Plan period within the administrative boundaries.</p> <p>It is an appropriate strategy – as supported by SA/SEA and proportionate evidence base and four periods of formal public consultation and on-going positive engagement with neighbouring authorities and key stakeholder and consultee bodies.</p> <p>Crawley Borough Local Plan does seek to meet its objectively assessed employment needs.</p> <p>The Local Plan demonstrates how it will maximise housing delivery within the borough. It meets 42% of its objectively assessed housing needs due to the physical constraints and size of the borough. The council has secured a number of agreements with neighbouring authorities, including those within the Housing Market Area. However, at this point, due to different timings for Plan progression, no authority has confirmed it will meet Crawley’s unmet needs in full.</p>				

	<b>KEY QUESTIONS</b>	<p align="center"><b>Assessment</b></p> <p align="center"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<p>Crawley is accessible to all of the main towns in the neighbouring authorities within the NWS Housing Market Area. This is supported by the historic migration and travel to work data.</p>				
		<p><b>Implications of taking no further action:</b> Crawley’s unmet housing needs will not be met.</p>				
		<p><b>Mitigation / Action required (if necessary) to move scale to right:</b> Continuing positive and on-going engagement across the Northern West Sussex Housing Market Area and with other authorities to explore opportunities and resolving environmental infrastructure constraints, including urban extensions to Crawley. Positive implementation of the policies within the Plan to maximise housing delivery.</p>				
		<p><b>Reviewer Comments:</b> Seeks to meet the Area’s objectively assessed needs and is informed by agreements with neighbouring authorities.</p>				
2.	<p><b>Is it clear how the amount of development identified for any growth areas or major site allocations has been determined – and that the level proposed is deliverable and justified?</b></p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p><b>Reason for score: +2</b> The Local Plan contains clear policies to allocate sites supported by detailed consistent evidence, set out in the Topic Papers. Topic Papers 4: Housing Supply and 5: Employment Needs and Land Supply detail the evidence to justify and support this position, including:</p> <ul style="list-style-type: none"> <li>• Through various stages of Call for Sites throughout the Plan preparation.</li> <li>• Urban Capacity Study</li> <li>• Strategic Housing Land Availability Assessment/Housing Trajectory</li> <li>• Crawley Borough Council as deliverer</li> <li>• Employment Land Availability Assessment/Employment Land Trajectory</li> <li>• Economic Growth Assessment</li> <li>• Viability Assessment</li> <li>• Town Centre as key growth area – overall sites aware assessed for capacity.</li> </ul>				
		<p><b>Implications of taking no further action:</b></p>				
		<p><b>Mitigation / Action required (if necessary) to move scale to right:</b></p>				
		<p><b>Reviewer Comments:</b></p>				

<b>KEY QUESTIONS</b>		<b>Assessment</b>				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
<b>3.</b>	<p>Is it clear that the local plan policies update provides for the most appropriate level of housing growth using the standard methodology as a starting point? Can you clearly articulate why planned growth levels should not be higher or lower?</p> <p>If you are proposing any material change away from the level of housing indicated by the standard method, can you clearly justify this through evidence?</p> <p>Does the level of housing provide for an appropriate and justified buffer?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p><b>Reason for score: +2</b> The Standard Method is used as the starting point for housing need arising within the borough.</p> <p>The Housing Requirement does not meet the full housing need level. As set out in Q1. Crawley’s constraints mean it is unable to meet all of its housing need within the administrative boundaries. On-going discussions across the housing market area seek to meet the unmet need within the NWS HMA. The Local Plan minimum figure and positively considers all reasonable opportunities – Housing Typologies policies for flexible windfall considerations.</p>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>				
<b>4.</b>	<p>Is the distribution of development justified in respect of the need for, and approach to, Green Belt release and can you demonstrate that alternatives to Green Belt release have been fully considered? Can you demonstrate that exceptional circumstances exist to justify green belt release?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score:</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b> N/A				

KEY QUESTIONS		<b>Assessment</b>				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
<b>5.</b>	<b>Is it clear how sites have been selected and have site allocations been made on a consistent basis having regard to the evidence base, including housing and employment land availability assessments, the Sustainability Appraisal and viability assessment? If not, can you justify why?</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score: +2</b>				
		The Local Plan contains clear policies to allocate sites supported by detailed consistent evidence, set out in the Topic Papers. Topic Papers 4: Housing Supply and 5: Employment Needs and Land Supply detail the evidence to justify and support this position, including:				
		<ul style="list-style-type: none"> <li>• Through various stages of Call for Sites throughout the Plan preparation.</li> <li>• Urban Capacity Study</li> <li>• Strategic Housing Land Availability Assessment/Housing Trajectory</li> <li>• Crawley Borough Council as deliverer</li> <li>• Employment Land Availability Assessment/Employment Land Trajectory</li> <li>• Economic Growth Assessment</li> <li>• Viability Assessment</li> <li>• Sustainability Assessment</li> </ul>				
		<b>Implications of taking no further action:</b>				
<b>Mitigation / Action required (if necessary) to move scale to right:</b>						
<b>Reviewer Comments:</b>						
<b>6.</b>	<b>Does the local plan policies update identify a housing requirement for designated neighbourhood areas?</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score: N/A</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>				

<b>KEY QUESTIONS</b>		<b>Assessment</b>				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
<b>7.</b>	<b>Do site allocations include sufficient detail on the mix and quantum of development, including, where appropriate any necessary supporting infrastructure?</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score: +2</b>				
		The Local Plan contains clear policies to allocate sites supported by detailed policies setting expectations from development:				
		EC4: Strategic Employment Location				
		H2: Key Housing Sites (indicative capacity figure; open space and housing for older people and those with disabilities)				
		H4: Future Housing Mix				
H5: Affordable Housing						
TC2: Town Centre Neighbourhood Facilities						
IN1: Infrastructure Provision						
ST1: Development and Requirements for Sustainable Transport						
ST2: Car and Cycle Parking Standards – Planning Obligations Annex						
<b>Implications of taking no further action:</b>						
<b>Mitigation / Action required (if necessary) to move scale to right:</b>						
<b>Reviewer Comments:</b>						
Incremental impacts from smaller infill developments and medium sized sites.						
<b>D</b>	<b>What targets have you set for non-residential floorspace or employment land and, if relevant, the number of jobs to be created over the plan period?</b>  <b>List these targets and the evidence source for this 'need' target?</b>	Policy EC1 sets the total requirement for 26.2ha new business land (113,390sq.m equivalent) over the whole Plan period. Jobs equivalent = 1,820 business sector jobs.				
		Evidence: <ul style="list-style-type: none"> <li>• Economic Growth Assessment &amp; Crawley Updates.</li> <li>• Employment Topic Paper (Market Update).</li> </ul>				

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		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
<b>8.</b>	<b>Where and how are the targets referred to above to be delivered? Do the sites and indicative capacities that you have identified demonstrate that these targets are achievable? If you are not allocating sites to meet needs identified, can you justify and explain how those needs will be met?</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score: +2</b> Policy EC1 confirms the targets will be met through the Intensification of Main Employment Areas (Policies EC1 – EC4) and the allocation of a strategic employment site in Policy EC4: Strategic Employment Location  Evidence to support this is set out in: <ul style="list-style-type: none"> <li>• Employment Land Availability Assessment/Employment Land Trajectory</li> <li>• Employment Topic Paper</li> </ul>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>				
<b>9.</b>	<b>Does the local plan policies update: (i) identify infrastructure that is necessary to support planned growth; and (ii) enable provision of this infrastructure?</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score: +2</b> The following policies identify and enable the necessary infrastructure to support planned growth: <ul style="list-style-type: none"> <li>• Policy EC4</li> <li>• Policy ST1</li> <li>• Policy IN1</li> <li>• Planning Obligations Annex</li> <li>• Infrastructure Plan</li> <li>• Local Cycle and Walking Infrastructure Plan</li> <li>• Strategic Road Network and local road junction improvements.</li> </ul>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>				

		<b>Assessment</b>				
<b>KEY QUESTIONS</b>		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
<b>10.</b>	<p><b>Can you demonstrate that the transport and other infrastructure needed to support <u>each</u> growth area or strategic site identified in the local plan policies update: (i) can be funded and delivered; and (ii) is supported by the relevant providers/ delivery agents in terms of funding and timescales indicated?</b></p> <p><b>Have you identified the extent of any funding gap? If so, are you able to explain why you are confident that any gap can be addressed?</b></p>	-2	-1	0	<b>+1</b>	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	<b>Yes, we are likely to meet this requirement</b>	Yes, we are confident our plan will meet this requirement
		<p><b>Reason for score: +1</b>                      Work is ongoing with WSCC and National Highways to demonstrate the improvements needed can be secured through the Plan period. This will be set out in the Infrastructure Plan delivery table.                      CBC has successfully secured funding bids for infrastructure improvements and is a CIL collecting authority.</p>				
		<p><b>Implications of taking no further action: there would be a funding gap remaining.</b></p>				
		<p><b>Mitigation / Action required (if necessary) to move scale to right:</b>  <b>Continued work with Highway Authority and National Highways and securing funding.</b></p>				
<p><b>Reviewer Comments:</b></p>						
<p><b>Process and Outcomes (see also Toolkit Parts 2 and 3)</b></p>						
<b>E</b>	<p><b>What are the cross boundary strategic matters affecting your local plan policies update? List these.</b></p>	<p>Local Plan paragraph 1.30 confirms the following as identified strategic issues relating to the development of Crawley over the Local Plan period:</p> <ul style="list-style-type: none"> <li>• Housing Needs</li> <li>• Economic Growth</li> <li>• Gatwick Airport</li> <li>• Gypsy and Travellers</li> <li>• Key Transport</li> <li>• Communications</li> <li>• Low Carbon</li> <li>• Water Resources</li> <li>• Flooding and Flood Risk</li> </ul> <p>In addition the Infrastructure Plan confirms Supporting Infrastructure is a cross boundary matter.                      The Duty to Cooperate highlights the full range of matters considered across Crawley’s administrative boundaries.</p>				



KEY QUESTIONS		<b>Assessment</b> <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
11.	<b>Does your Duty to Cooperate Statement(s) of Common Ground: (i) identify these issues; (ii) identify the bodies you have engaged with or continue to engage with; and (iii) clearly set out not just the process, but the outcomes of this engagement highlighting areas of agreement and of difference?</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score: +2</b> The Duty to Cooperate Statement details the full range of matters and engagement processes throughout the Local Plan Review and clear agreements. Numerous detailed Statements of Common Ground have been agreed at variety of levels and geographic areas, identifying outcomes and agreements.				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
<b>Reviewer Comments:</b>						
F	<b>Are there any aspects of the local plan policies update not in conformity with national policy (or where you will be relying on transitional provisions)? Please set these out and provide justification with reference to evidence for these. Are you satisfied you can robustly defend this on the basis of local evidence?</b>  <i>For instance, are you seeking to require affordable housing on sites which are below the threshold of major development as defined by national planning policy?</i>	The Crawley Borough Local Plan includes three policies which seek requirements beyond those set out in national policy: <ul style="list-style-type: none"> <li>• Policy H5 requires affordable housing on sites which are below the threshold of major development as defined by national planning policy (All Residential Development, including those providing care regardless of whether it falls into Use Class C2 or C3, resulting in a net increase of at least one new housing unit). This is supported by evidence provided in the Strategic Housing Market Assessment; Windfalls Statement; Housing Needs Topic Paper.</li> <li>• Policy SDC4 seeks tighter water efficiency standard below Building Regulations Optional Standards (110lp) for all development which increases water use within the Sussex North Water Resource Zone (within Crawley). The evidence for this is set out in the Water Neutrality Study Parts A-C and Water Neutrality Topic Paper. The requirement for all development to be water neutral is a legal requirement to satisfy the Habitats Regulations.</li> <li>• Policy EC7 does not apply the sequential test for hotels located at Gatwick Airport. The justification for this is set out in the supporting Local Plan Reasoned Justification to the policy.</li> </ul>				

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<b>12.</b>	<b>Are there any specific policies in the local plan policies update where there are differences to any policy approach set out in a relevant strategic planning framework (e.g. the London Plan, or a plan produced by a Combined Authority or through voluntary agreement).</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score: N/A</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
<b>Reviewer Comments:</b>						
<b>13.</b>	<b>Is the local plan policies update:</b> <ul style="list-style-type: none"> <li>• in conformity with any ‘higher level’ plans prepared by the Council; and</li> <li>• properly reflecting provisions of any made neighbourhood plan?</li> </ul>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score: N/A</b>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
<b>Reviewer Comments:</b>						
<b>14.</b>	<b>Does your Consultation Statement demonstrate how you have complied with the specific requirements of the Town and Country Planning (Local Plan) (England) Regulations 2012 and the Council’s adopted Statement of Community Involvement to date [you should revisit and update this following the publication of your Regulation 19 local plan policies update]?</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score: +2</b>				
		Consultation at each stage has been in accordance with the SCI. This is set out in the Consultation Statement. The Consultation Statement has been updated following the close of the Further Publication Consultation (Regulation 19) carried out May – June 2023 (July 2023 version)				
		<b>Implications of taking no further action:</b>				
<b>Mitigation / Action required (if necessary) to move scale to right:</b>						
<b>Reviewer Comments:</b>						

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		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
<b>15.</b>	<b>Has the Sustainability Appraisal – incorporating the requirements of the Strategic Environmental Assessment legislation - evaluated all reasonable alternatives? Is it clear why alternatives have not been selected?</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score: +2</b> Appendix G & Appendix H of the SA/SEA Report set out the detailed assessments of policies and sites (allocations and designations) against the reasonable alternatives.				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
<b>Reviewer Comments:</b>						
<b>16.</b>	<b>Does the Sustainability Appraisal adequately assess the likely significant effects of policies and proposals?</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score: +2</b> Summary Table in SA (Table 7.1 pages 46-47) and the Local Plan (Appendix A) confirms the likely effects of the Local Plan policies. Appendix G & Appendix H of the SA/SEA Report set out the detailed assessments of policies and sites (allocations and designations) identifying the likely significant effects against the Sustainability Objectives.				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
<b>Reviewer Comments:</b>						
<b>17.</b>	<b>Is it clear how the Sustainability Appraisal has influenced the local plan policies update</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score: +2</b>				

<b>KEY QUESTIONS</b>		<b>Assessment</b>				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
<b>18.</b>	<b>including how any policies or site allocations have been amended as a result and does it show (and conclude) that the local plan policies update is an appropriate strategy?</b>	SA/SEA Non-Technical Summary and Chapters 1-6 explain the iterative nature of the Local Plan and SA/SEA. Figure 3.2 in the SA/SEA (page 25) (replicated in the Local Plan on page 13) illustrates the programme for development of the Local Plan, SA/SEA and HRA. Appendix F, Appendix G and Appendix H set out the detailed assessments of the Local Plan strategy, policies and sites (allocations and designations) identifying the likely significant effects against the Sustainability Objectives.				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>				
<b>18.</b>	<b>Is it clear how an Equalities Impact Assessment has influenced the local plan policies update?</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score: +2</b>				
		The Equalities Impact Assessment has been combined in the SA/SEA. This is confirmed in paragraph 4 of the SA/SEA Non-Technical Summary and paragraph 1.2 of the SA/SEA.				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
<b>19.</b>	<b>Does the Habitats Regulations Assessment consider the local plan policies update in combination with other plans and projects?</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score: +2</b>				
		The HRA/AA has been published to support the Local Plan, and considers the Local Plan policies in Chapter 2, Chapter 7 and Chapter 13, and Appendix F and Appendix G				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				

<b>KEY QUESTIONS</b>		<b>Assessment</b>				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		<b>Reviewer Comments:</b>				
<b>20.</b>	<b>If the Habitats Regulations Assessment has identified, through ‘Appropriate Assessment’ that mitigation measures are required, does the local plan policies update adequately identify the measures required and the mechanisms for delivering them?</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score: +2</b>				
		The HRA Appropriate Assessment confirms that the mitigation required through Local Plan policy for water efficiency measures and the LPA-led water neutrality off-setting scheme will ensure development in the Local Plan will achieve water neutrality. This will ensure no adverse effects on water levels at the Arun Valley from the Local Plan either alone or in-combination.				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>				
<b>21.</b>	<b>Is it clear how the outcomes and conclusions of the Habitats Regulations Assessment have influenced the local plan policies update?</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score: +2</b>				
		The Local Plan has been directly influenced by the Habitats Regulations Assessment, in requiring water neutrality to be achieved. This has also influenced development delivery rates and levels (particularly across the wider area within the Sussex North Water Resource Zone outside of Crawley)				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>				

<b>KEY QUESTIONS</b>		<b>Assessment</b>				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
<b>Housing Strategy</b>						
<b>22.</b>	<p><b>Can you demonstrate that the policies and proposed allocations in your local plan policies update meet your housing requirement in full and that this can be achieved as a minimum? If not [for instance, because another local authority has agreed to plan for your unmet need], can you explain and robustly justify why?</b></p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p><b>Reason for score: +2</b></p> <p>The Local Plan demonstrates how it will maximise housing delivery within the borough. It meets 42% of its objectively assessed housing needs due to the physical constraints and size of the borough. The council has secured a number of agreements with neighbouring authorities, including those within the Housing Market Area. However, at this point, due to different timings for Plan progression, no authority has confirmed it will meet Crawley’s unmet needs in full. Crawley is accessible to all of the main towns in the neighbouring authorities within the NWS Housing Market Area. This is supported by the historic migration and travel to work data.</p> <p>The Standard Method is used as the starting point for housing need arising within the borough.</p> <p>The Housing Requirement does not meet the full housing need level. As set out in Q1. Crawley’s constraints mean it is unable to meet all of its housing need within the administrative boundaries.</p> <p>On-going discussions across the housing market area seek to meet the unmet need within the NWS HMA.</p> <p>The Local Plan minimum figure and positively considers all reasonable opportunities – Housing Typologies policies for flexible windfall considerations.</p> <p>Topic Papers 4: Housing Supply and 5: Employment Needs and Land Supply detail the evidence to justify and support this position, including:</p> <ul style="list-style-type: none"> <li>• Through various stages of Call for Sites throughout the Plan preparation.</li> <li>• Urban Capacity Study</li> <li>• Strategic Housing Land Availability Assessment/Housing Trajectory</li> <li>• Crawley Borough Council as deliverer</li> </ul> <p>The Duty to Cooperate Statement sets out the ways in which the council has sought to engage with neighbouring authorities in relation to its unmet housing needs &amp; Statements of Common Ground with the Northern West Sussex authorities and bilateral SoCG have been agreed.</p>				
		<b>Implications of taking no further action for local plan soundness and/or effectiveness:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
<b>Reviewer Comments:</b>						

		<b>Assessment</b>				
<b>KEY QUESTIONS</b>		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
<b>G</b>	<b>Is there any unmet need in neighbouring areas that you have been formally asked to accommodate? If yes, then list the amount by each local authority area.</b>	Yes, Crawley Borough Council has been approach by the following authorities to consider meeting unmet needs arising from their areas: <ul style="list-style-type: none"> <li>• Chichester (2021: 1,900 homes shortfall)</li> <li>• Hastings (2021: 5,175 new homes shortfall)</li> <li>• Mole Valley (2021: 1,700 housing units shortfall)</li> <li>• Worthing (2021: 10,488 dwellings shortfall)</li> </ul>				
<b>23.</b>	<b>Does your local plan policies update accommodate any of this unmet need where you can sustainably do so?</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score: +2</b>				
		Crawley is unable to sustainably meet any unmet needs, as it is unable to sustainably meet its own needs in full.				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
<b>Reviewer Comments:</b>						
<b>24.</b>	<b>Is there a housing trajectory which illustrates the expected rate of housing delivery and ensures the maintenance of a 5-year supply during the plan period?</b>  <b>Is your strategy for delivery and implementation clearly articulated and justified to support the trajectory?</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score: +2</b>				
		A Housing Trajectory is set out in the Local Plan pages 313-316				
		The Crawley Borough Local Plan and supporting documents demonstrate how the delivery of the housing will be supported to come forward at the expected rates.				
		The Local Plan is supported by a Viability Assessment.				
<b>Implications of taking no further action:</b>						
<b>Mitigation / Action required (if necessary) to move scale to right:</b>						
<b>Reviewer Comments:</b>						

<b>KEY QUESTIONS</b>		<b>Assessment</b>				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
<b>25.</b>	<b>Can you confirm: (i) that the local plan policies update will provide for a 5-year supply of specific deliverable sites on adoption; and (ii) that beyond this 5 year period sites are developable and (iii) if relevant, you have included a 5 or 20 percent buffer to deal with under-delivery.</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score: +2</b> The Local Plan Policy H2 and the Housing Trajectory confirms anticipated delivery. It is noted in paragraph 12.47 that where sites are identified as ‘developable’ it represents an assessment of likely timescales and does not represent a policy of phasing residential development, and that any such site could potentially come forward in years 1 to 5 of the Local Plan. Broad locations are identified in the Local Plan for where sites are anticipated to come forward in the latter part of the Plan period. An area of search for future residential development is acknowledged on the Key Diagram.				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>				
<b>26.</b>	<b>Does the level of supply provide any ‘head room’ (that is additional supply above that required) to enable you to react quickly to any unforeseen changes in circumstances and to ensure that the full requirement will be met during the plan period?</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score: +2</b> The Local Plan housing requirement is the delivery figure based on capacity assessment. It is a minimum figure – this is clearly set out in Policy H1. Policies in the Plan support the positive consideration of windfall figures to increase delivery above the anticipated Plan figure (Policy H1 and the housing typology policies H3 and H3a-f).				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>				
<b>27.</b>	<b>Is the Council reliant on the delivery of any ‘windfall’ sites (sites not specifically identified in the development plan) during</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement



<b>KEY QUESTIONS</b>		<b>Assessment</b>				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
	<b>the plan period and if so, how many and when? Is there compelling evidence to confirm that such sites will continue to come forward?</b>	<p><b>Reason for score: +2</b> 100dpa = 1,600 over the Plan period. Windfalls Statement sets out clear explanation and justification behind the anticipated windfall figure.</p> <p><b>Implications of taking no further action:</b></p> <p><b>Mitigation / Action required (if necessary) to move scale to right:</b></p> <p><b>Reviewer Comments:</b></p>				
<b>28.</b>	<b>Does the local plan policies update make it clear what size, type and tenure of housing is required?</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p><b>Reason for score: +2</b> Policies H4 and H5 in the Local Plan set out the housing size, type and tenure of housing required within the borough. This is based on the evidence provided in the Strategic Housing Market Assessment.</p> <p><b>Implications of taking no further action:</b></p> <p><b>Mitigation / Action required (if necessary) to move scale to right:</b></p> <p><b>Reviewer Comments:</b></p>				
<b>29.</b>	<b>Does the local plan policies update specifically address the needs of different groups in the community?</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p><b>Reason for score: +2</b> The policies within the Local Plan is based on the evidence set out in the Strategic Housing Market Assessment. Specific policies to meet the needs of different groups include:</p> <ul style="list-style-type: none"> <li>• Policy H4: Future Housing Mix</li> <li>• Policy H5: Affordable Housing – rental and purchase</li> <li>• Policy H6: Build to Rent</li> <li>• Policy H7: Self-Build and Custom Build</li> <li>• Policy H2: Key Housing Sites (Older People and those with Disabilities Allocations)</li> <li>• Policy H9: Houses in Multiple Occupation</li> </ul>				

<b>KEY QUESTIONS</b>		<b>Assessment</b>				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		<ul style="list-style-type: none"> <li>• Policy H8: Gypsies, Travellers and Travelling Showpeople</li> <li>• Policy DD2: Inclusive Design</li> </ul>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>				
<b>30.</b>	<p><b>Can your affordable housing requirements, including any geographical variations, be justified?</b></p> <p><b>Does the local plan policies update provide for the delivery of the full need for affordable housing? If not, can you explain and justify why?</b></p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p><b>Reason for score: +2</b></p> <p>Policy H5 differentiates between borough-wide residential development schemes and town centre residential development schemes. This is based on the findings of the Viability Assessment.</p> <p>The overall need is set out in the Strategic Housing Market Assessment. The Local Plan does not meet the full affordable housing needs (meeting less than 15% of the identified affordable housing needs arising within the borough) – this is explained in the Housing Needs Topic Paper and the Unmet Needs Topic Paper. On this basis, and due to the types of sites anticipated in the future in Crawley, affordable housing is required from all new residential development. Affordable housing forms part of the cross-boundary discussions with neighbouring authorities.</p>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>				
<b>31.</b>	<p><b>Have the needs for travellers and travelling showpeople been adequately assessed in accordance with national policy and have they been based on robust evidence?</b></p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score: +2</b>				

<b>KEY QUESTIONS</b>		<b>Assessment</b>				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
	<b>Does the local plan policies update make adequate provision for the identified needs?</b>	The Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment does not identify an immediate need. It has been undertaken in a consistent manner in accordance with national policy and guidance and is based on proportionate and robust evidence. Policy H8 sets the criteria to consider planning applications should they come forward during the Plan period and allocates a site as reserve Traveller site for up to 10 pitches should the need arise.				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>				
<b>32.</b>	<b>Will the local plan policies update provide for a 5-year supply of deliverable travellers and travelling showpeople pitches to meet identified needs?</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score: +2</b> The Accommodation Needs Assessment has not indicated there is an immediate need. However, a reserve site has been allocated. The site is within Council ownership.				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>				
<b>H</b>	<b>List any travellers and travelling showpeople sites identified to meet need and the timescales for their delivery</b>	<ul style="list-style-type: none"> <li>Broadfield Kennels Reserve Site (Policy H8) – Plan years 6-16, should a need arise.</li> </ul>				

KEY QUESTIONS		<p style="text-align: center;"><b>Assessment</b></p> <p style="text-align: center;"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
<b>Justified approaches to plan policy and content</b>						
<b>33.</b>	<p><b>Where thresholds are set in policies which trigger specific policy requirements, are these thresholds justified by evidence and is this clear in the supporting text?</b></p> <p><b>[You may wish to check each policy setting a threshold]</b></p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p><b>Reason for score: +2</b></p> <p>The following Policies contain threshold triggers. These are either clearly explained in the supporting text or in the Glossary. Wherever possible consistent and nationally recognised thresholds have been used, unless there is a clear purpose for an alternative.</p> <ul style="list-style-type: none"> <li>• Policy SD2: Enabling Healthy Lifestyles and Wellbeing – Major development (Health Impact Assessment)</li> <li>• Policy CL2: Making Successful Places – Principles of Good Urban Design – Major Applications &amp; Schemes of Moderate Density and Above (defined in Policy CL4)</li> <li>• Policy CL4: Compact Development – Layout, Scale and Appearance – distances from stations and Fastway stops &amp; significant scale and density thresholds</li> <li>• Policy CL5: Significant Development, Masterplanning and Design Success – significant developments</li> <li>• Policy DD1: Normal Requirements of All New Development – 45dph (provision)</li> <li>• Policy EC3: Manor Royal – in excess of 100sq.m</li> <li>• Policy TC5: Town Centre First – 500sq.m to demonstrate impact</li> <li>• Policy H4: Future Housing Mix – Major residential development</li> <li>• Policy H7: Self and Custom Build – 50+ units</li> <li>• Policy GI1: Green Infrastructure – large development proposals</li> <li>• Policy SDC1: Sustainable Design and Construction – single dwelling/100sqm/extension of building over 1,000sq.m/cumulative 100sq.m; Major developments</li> <li>• Policy SDC2: Tackling Water Stress – Major developments; new dwelling or creation of 1,000sq.m internal floorspace</li> <li>• Policy EP1: Development and Flood Risk – Major developments</li> <li>• Policy EP2: Flood Risk Guidance for Householder Development and Minor Non-Residential Extension – householder development, non-residential developments less than 250sq.m</li> <li>• Policy EP4: Development and Noise – noise thresholds (supported by the Noise Annex)</li> </ul>				

<b>KEY QUESTIONS</b>		<b>Assessment</b>					
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>					
		<ul style="list-style-type: none"> <li>• Policy EP5: Air Quality – thresholds set out in Air Quality Guidance</li> <li>• Policy ST1: Development and Requirements for Sustainable Transport – those which creates significant demand for travel; specific thresholds set out in Local List; Major development – in Reasoned Justification</li> <li>• Policy ST2: Car and Cycle Parking Standards – thresholds set out in Planning Obligations Annex Glossary – set out thresholds re: Major Development and Significant Development</li> </ul>					
		<b>Implications of taking no further action:</b>					
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>					
		<b>Reviewer Comments:</b>					
34.	Does the local plan policies update avoid deferring details on strategic matters to other documents? If it does, is it clear <i>why</i> matters will be covered in other Development Plan Documents or Supplementary Planning Documents and why this is appropriate?	-2	-1	0	+1	+2	
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement	
		<b>Reason for score: +2</b>					
		The Local Plan does not defer strategic matters to other documents: Development Plan Documents or Supplementary Planning Document. The Local Plan contains the full set of strategic and non-strategic policies anticipated necessary for implementing decisions within the borough over the Plan period. Supplementary Planning Documents are referred to in appropriate places where these either exist, will be updated or created in order to support the implementation of Local Plan policies.					
		<b>Implications of taking no further action:</b>					
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>					
		<b>Reviewer Comments:</b>					
35.	Where the local plan policies update defines a hierarchy do policies throughout the Plan consistently: (i) reflect this hierarchical approach; (ii) make clear the level of protection afforded to designations depending on their status within the hierarchy; and (iii) is the approach consistent with National Policy?	-2	-1	0	+1	+2	
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement	
		<b>Reason for score: +2</b>					
		The following polices include a hierarchical approach. These seek to ensure a clear level of protection is provided for each level consistent with national policy:					

	KEY QUESTIONS	<p style="text-align: center;"><b>Assessment</b></p> <p style="text-align: center;"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
	<p>[For example, hierarchies could relate to nature conservation, heritage assets, town centres/retail, settlements.]</p>	<ul style="list-style-type: none"> <li>• Heritage Policies (Policies HA1-HA7): Heritage Assets; Conservation Areas; Areas of Special Local Character; Listed Buildings and Structures; Locally Listed Buildings; Historic Parks and Gardens; Heritage Assets of Archaeological Interest</li> <li>• Nature Conservation (Policy GI2): Biodiversity Sites</li> <li>• Town Centre/Neighbourhood Centres (Policies TC1 &amp; TC5)</li> <li>• Energy Hierarchy &amp; Cooling Hierarchy (Policy SDC1)</li> <li>• District Energy Options (Policy SDC2)</li> <li>• Transport travel demand (Policy ST1)</li> </ul> <p><b>Implications of taking no further action:</b></p> <p><b>Mitigation / Action required (if necessary) to move scale to right:</b></p> <p><b>Reviewer Comments:</b></p>				
36.	<p>Where policies seek to limit certain uses, is this justified by evidence and is the rationale clear in the supporting text to the policy and in the evidence.</p> <p>[For example, policies relating to town centres, employment or retail may seek to limit certain uses.]</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p><b>Reason for score: +2</b></p> <p>The following policies limit certain uses. The Reasoned Justifications supporting each policy sets out the clear rationale and each policy is supported by clear evidence.</p> <ul style="list-style-type: none"> <li>• Policies EC2 and EC3: Protection policies limiting non-employment development in Main Employment Areas</li> <li>• Policy TC5: Sequential Impact Town Centre Uses</li> <li>• Policy GAT2: restriction of development in Gatwick Airport Safeguarded Land</li> <li>• Policy GAT3: restriction of off-Airport Parking</li> <li>• Policy GAT4: restriction of non-airport related use on-airport</li> <li>• Policies EC11 and EP4: Noise Sensitive Uses (Gatwick noise contours and Employment Buffer Zones)</li> </ul>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>				

		<b>Assessment</b>				
<b>KEY QUESTIONS</b>		<p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
<b>37.</b>	<p><b>Is it clear that any standards proposed for development are justified and deliverable, taking into account the scale of the development? Where relevant, are they consistent with the principles set out in the National Design Code and National Model Design Code?</b></p> <p><b>[For example, onsite provision of open space, optional technical standards, internal and external space standards.]</b></p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p><b>Reason for score: +2</b></p> <p>The following policies set standards for developments to meet. These are consistent with national policies, with the exception of Water Neutrality – which is required in order to meet legislative requirements set out in the Habitats Regulations.</p> <ul style="list-style-type: none"> <li>• Policies CL2: Making Successful Places – Principles of Good Urban Design; CL3: Movement Patters, Layout and Sustainable Urban Design; CL4: Compact Development – Layout, Scale and Appearance; and CL5: Significant Development, Masterplanning and Design Success (to meet the design parameters and principles set out in the National Design Guide and National Model Design Code)</li> <li>• Policy DD1: Normal Requirements of All New Development (Secure by Design; Urban Design SPD &amp; Crawley-based design codes, National Design Guide, National Model Design Code, Building for a Healthy Life, BRE Guidance document: Site Layout Planning for Daylight and Sunlight)</li> <li>• Policy DD2: Inclusive Design (Building Regulations Part M Category 2)</li> <li>• Policy DD3: Standards for All New Dwellings (including conversions) (Nationally Described Space Standards)</li> <li>• Policy DD4: Tree Replacement Standards (Adopted Crawley Borough Local Plan 2015 Policy, Green Infrastructure Supplementary Planning Document, Trees in the Townscape: A Guide for Decision Makers)</li> <li>• Policy OS1: Open Space, Sport and Recreation (Open Space Standards)</li> <li>• Policy SDC1: Sustainable Design and Construction (Energy Performance – Building Regulations Part L; BREEAM Excellent minimum standards for Energy and Water)</li> <li>• Policy SDC3: Water Stress (Building Regulations Part G Optional Technical Standards for Achieving Water Efficiency and BREEAM Excellent minimum standards for Water)</li> <li>• Policy SDC4: Water Neutrality (85lpd residential and 3 credits within WAT01 Water Consumption BREEAM standard)</li> <li>• Policy ST2: Car and Cycle Parking Standards (set out in Parking Annex to the Local Plan, including Electrical Vehicle Charging Points)</li> </ul>				
		<b>Implications of taking no further action:</b>				
<b>Mitigation / Action required (if necessary) to move scale to right:</b>						

<b>KEY QUESTIONS</b>		<b>Assessment</b>				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		<b>Reviewer Comments:</b>				
<b>Deliverability</b>						
<b>38.</b>	<b>Has the viability of the local plan policies update been suitably tested and does this testing cover all requirements including in respect of any required standards, affordable housing provision and transport and other infrastructure needs and if relevant the implications of CIL?</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score: +2</b>				
		The Local Plan has been tested by Viability Assessment undertaken by an independent expert. This includes the financial implications of the combined Local Plan policies, the standards required through the policies, affordable housing requirements, the anticipated S106 requirements for infrastructure necessary for the delivery of the developments set out in the Local Plan and the existing CIL charging levels.				
		It was subject to an update following the inclusion of water neutrality requirements and the passing of time due to the Local Plan delays.				
		<b>Implications of taking no further action:</b>				
<b>39.</b>	<b>Does the local plan policies update reflect the conclusions and recommendations of your viability evidence?</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score: +2</b>				
		The policies within the Local Plan have been developed iteratively alongside the emerging Viability Assessment as it was undertaken, and so reflect the outcomes of this evidence. In particular, s106 contributions were scrutinised to ensure they were in conformity with the legal requirements and would not be undermining the deliverability of the Local Plan.				
		Critically, Policy H5 includes a geographical distinction regarding the affordable housing requirement between Borough-wide residential development schemes and those within the town centre, due to the town centre’s more limited viability – particularly due to the higher land values and the cost of the types of higher density development anticipated within smaller brownfield sites.				
		<b>Implications of taking no further action:</b>				



		<b>Assessment</b>				
<b>KEY QUESTIONS</b>		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>				
<b>40.</b>	<b>Does the monitoring framework clearly set out what matters will be monitored, and the indicators used? Are these measurable and can the data be readily secured/captured?</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score: +2</b>				
		The Local Plan’s Monitoring and Implementation Framework was published alongside the Local Plan Regulation 19 consultation. This sets out clearly the approach to Monitoring the Local Plan following adoption and sets out the indicators to be used. The indicators are measurable using data which the Strategic Planning team believe can be readily secured and captured.				
		The Authority’s Monitoring Report is published annually and has monitored the delivery of the current adopted Local Plan (2015-2030). The new Monitoring and Implementation Framework has been prepared against the lessons learnt from collecting the data to consider the implementation success or otherwise of the Plan.				
		In addition, the monitoring indicators set out in the SA/SEA have been scrutinised and assessed against their measurability and availability.				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>				
<b>41.</b>	<b>Does the local plan policies update and monitoring framework identify a clear framework for <u>plan review</u>?</b>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<b>Reason for score: +2</b>				
		The Monitoring & Implementation Framework identifies the approach the council will take in monitoring the effectiveness of the Local Plan. In addition, the Local Plan paragraphs 1.34-1.37 set out the triggers which relate to the Local Plan review process.				
		The Local Plan will be monitored and the outcomes published in the Authority’s Monitoring Report, at least annually.				
		The process for review will be published in the council’s updated Local Development Schemes, which will reflect the conclusions of the Authority’s Monitoring Reports.				
<b>Where triggers for plan review and/or update are identified are they justified and proportionate?</b>						

<b>KEY QUESTIONS</b>		<b>Assessment</b>				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>				
<b>Plan effectiveness (and associated policy clarity)</b>						
<b>42.</b>	<p><b>Does the local plan policies update clearly set out the timeframe that it covers? Is it clear which policies are strategic? Will the strategic policies provide for a minimum of 15 years from adoption? Does the evidence relied on to support those policies correspond/cover this whole period? Where larger scale developments are proposed as part of the strategy, does the vision look further ahead (at least 30 years)?</b></p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p><b>Reason for score: +2</b>                      The Local Plan period covers 16 years from anticipated adoption (2024).                      The Strategic Policies are clearly identified as Strategic Policies.                      The evidence supporting the Local Plan has been reviewed to ensure it covers the Plan period and the Local Plan policies are based on this information. This has included recent Economic Growth and Viability Updates, and Transport sensitivity testing.                      No larger scale development is proposed through the Local Plan within Crawley beyond the Plan period (30 years). Following the completion of Forge Wood Neighbourhood, the borough does not contain any significant areas of undeveloped land suitable for expansion within the administrative boundaries. Land between the town and Gatwick Airport is constrained by Safeguarding for potential future runway expansion and noise levels which limit opportunities for residential development. An area of search has been identified on the Key Diagram for Potential Future Housing. However, this would depend on decisions regarding the future development of Gatwick Airport.</p>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
<b>Reviewer Comments:</b>						
<b>43.</b>	<p><b>Does the local plan policies update clearly set out which adopted Development Plan policies it supersedes?</b></p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p><b>Reason for score: +2</b>                      The Local Plan is clear that it supersedes whole currently adopted Local Plan (2015-2030), set out in paragraph 1.3.</p>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				

<b>KEY QUESTIONS</b>		<b>Assessment</b>				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>				
		-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
<b>44.</b>	<b>Are the objectives the policies are trying to achieve clear, and can the policies be easily used and understood for decision making?</b>	<p><b>Reason for score: +2</b>                      The Local Plan Vision sets aspirational aims and objectives for the borough to achieve through the delivery of the policies within the Local Plan. The Local Plan is based on proportionate evidence to ensure it is realistic and deliverable.                      Cross-referencing is provided within and across the policies in the Plan in order to avoid duplication.                      The Policies have been subject to internal and public scrutiny from the start of the Local Plan Review process to ensure they are necessary, fit for purpose, and are clear and unambiguous.                      The starting point for the Local Plan Review was the adopted Local Plan (2015-2030). The Authority’s Monitoring Report has monitored the success of policy implementation since its adoption. Some of the issues identified with policy implementation was acknowledged to be solved by clearer policy wording. These issues have been addressed through the Local Plan Review.</p> <p><b>Implications of taking no further action:</b></p> <p><b>Mitigation / Action required (if necessary) to move scale to right:</b></p> <p><b>Reviewer Comments:</b></p>				
		-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
<b>45.</b>	<p><b>For each policy area you have designated or defined in the Plan: (i) are these clearly referenced and explained in the Plan; and (ii) clearly defined on the Policies Map?</b></p> <p><b>Where you have included maps or graphics within the local plan policies update are these legible and is it clear if and how they are to be used in decision making?</b></p>	<p><b>Reason for score: +2</b>                      Designations are clearly referenced in the Local Plan. These include:</p> <ul style="list-style-type: none"> <li>• Structural Landscaping (Policy CL6)</li> <li>• Important and Valued Landscape and Views (Policy CL7)</li> <li>• Development Outside the Built-Up Area (Countryside Character Areas and Edges) (Policy CL8)</li> <li>• High Weald Area of Outstanding Natural Beauty (Policy CL9)</li> </ul>				

	KEY QUESTIONS	<p style="text-align: center;"><b>Assessment</b></p> <p style="text-align: center;"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
		<ul style="list-style-type: none"> <li>• Conservation Areas (Policy HA2)</li> <li>• Areas of Special Local Character (Policy HA3)</li> <li>• Listed Buildings and Structures (Policy HA4)</li> <li>• Locally Listed Buildings (Policy HA5)</li> <li>• Historic Parks and Gardens (Policy HA6)</li> <li>• Heritage Assets of Archaeological Interest (Policy HA7)</li> <li>• Open Space, Sports and Recreation sites (Policy OS1)</li> <li>• Public Rights of Way and Access to the Countryside (Policy OS3)</li> <li>• Main Employment Areas (Policy EC2)</li> <li>• Manor Royal (Policy EC3)</li> <li>• Neighbourhood Centres (Policy EC12)</li> <li>• Gatwick Airport (Policy GAT1)</li> <li>• Gatwick Safeguarded Land (Policy GAT2)</li> <li>• Crawley Town Centre (Policy TC1)</li> <li>• Primary Shopping Area (Policy TC1)</li> <li>• Green Infrastructure (Policy GI1)</li> <li>• Biodiversity Sites (Policy GI2)</li> <li>• District Energy Network Priority Areas (Policy SDC2)</li> <li>• Sussex North Water Resource Zone (Policy SDC4)</li> <li>• Flood Risk Zones (Policies EP1 and EP2)</li> <li>• Noise Sensitive Locations (Policy EP4)</li> <li>• Air Quality Management Zones (Policy EP5)</li> <li>• Parking Zones (Policy ST2 and Parking Standards Annex)</li> <li>• Area of Search for a Crawley Western Multi-Modal Transport Link (Policy ST4)</li> </ul> <p>The Local Plan is accompanied by a fully comprehensive Local Plan Map, which provides the site boundaries for land use designations and allocations, covered by the Local Plan. Where required, it also shows designations from the West Sussex Minerals and Waste Plans. It will also be provided in an interactive format similar to that of the adopted Local Plan.</p> <p>Within the Local Plan, each relevant policy is supported by an extract of the Local Plan Map, showing the allocations or designations relating to that policy. This is to aid clarity when considering the Policy.</p>

<b>KEY QUESTIONS</b>		<b>Assessment</b>				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		<p>In some cases, technical evidence or nationally produced documents are referred to (such as flood risk zones and noise contours for Gatwick Airport). These will ensure the Plan remains up-to-date and accurate across the whole Plan period.</p> <p><b>Implications of taking no further action:</b></p> <p><b>Mitigation / Action required (if necessary) to move scale to right:</b></p> <p><b>Reviewer Comments:</b></p>				
46.	<p><b>Does each local plan policies update policy: (i) make clear the type of development it will promote; (ii) use positive rather than negative wording?</b></p>	-2	-1	0	+1	+2
No, we do not meet this requirement		No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement	
<p><b>Reason for score: +2</b>                      The Crawley Borough Local Plan is clear regarding promotion of development. It is positively worded and reflects the requirements set out in national policy.</p>						
<b>Implications of taking no further action:</b>						
<b>Mitigation / Action required (if necessary) to move scale to right:</b>						
<b>Reviewer Comments:</b>						
47.	<p><b>Do policies make clear where they are intended to be applied differently for the purposes of decision-making dependent on (i) scale; (ii) use; or (iii) location of development proposed.</b></p> <p><b>[Note: If you have said ‘all development’ this implies equal application irrespective of the development scale/use/location and this may not be either justified or deliverable]</b></p>	-2	-1	0	+1	+2
No, we do not meet this requirement		No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement	
<p><b>Reason for score: +2</b>                      Where policies apply to specific thresholds or geographic areas this is clearly set out in the Policy. Where the policy applies to all development, this has been carefully considered, supported by evidence and is believed to be practicable and deliverable through the development management process and in site design, particularly where this is clear from the start set out in the Local Plan policy.</p>						
<b>Implications of taking no further action:</b>						
<b>Mitigation / Action required (if necessary) to move scale to right:</b>						
<b>Reviewer Comments:</b>						

	<p><b>KEY QUESTIONS</b></p>	<p style="text-align: center;"><b>Assessment</b></p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
<p><b>I</b></p>	<p><b>State how many policies are in your local plan update?</b></p> <p><b>Can you list any policies within the local plan update that: (i) repeat parts of other policies within the plan; (ii) replicate or repeat paragraphs in the NPPF (iii) cross reference other policies.</b></p>	<p>There are 86 policies in total in the Local Plan (this includes 20 Strategic Policies).</p> <p>(i) no policies repeat parts of other policies within the Local Plan.</p> <p>(ii) The following policies replicate paragraphs in the NPPF:            Policy SD1: Presumption in Favour of Sustainable Development; Policy DD3: Standards for All New Dwellings (including conversions); Policy HA1: Heritage Assets; Policy HA4: Locally Listed Buildings and Structures; Policy OS1: Open Space, Sport and Recreation; Policy OS2: Reprovision of Open Space and Recreational Facilities; Policy OS3: Rights of Way and Access to the Countryside; and Policy GI2: Biodiversity Sites.            In all of these cases, locally specific considerations are included and the evidence and Reasoned Justifications ensures they are relevant and applied to the Crawley context.</p> <p>(iii) The following policies within the Local Plan cross-reference other policies:            Policy SD2: Enabling Healthy Lifestyles and Wellbeing; Policy CL1: Neighbourhood Principles; Policy CL2: Making Successful Places – Principles of Good Urban Design; Policy CL3: Movement Patterns, Layout and Sustainable Urban Design; Policy CL5: Significant Development, Masterplanning and Design Success; Policy CL7: Important and Valued Landscape and Views; Policy CL8: Development Outside the Built-Up Area; Policy DD1: Normal Requirements of All New Development; Policy HA1: Heritage Assets; Policy HA4: Listed Buildings and Structures; Policy HA6: Historic Parks and Gardens; Policy OS2: Provision of Open Space and Recreational Facilities; Policy EC2: Economic Growth in Main Employment Areas; Policy EC4: Strategic Employment Location; Policy EC6: High Quality Office Provision; Policy EC7: Hotel and Visitor Accommodation; Policy EC12: Neighbourhood Centres; Policy EC13: Rural Economy; Policy TC1: Primary Shopping Area; Policy TC2: Town Centre Neighbourhood Facilities; Policy TC3: Town Centre Key Opportunity Sites; Policy TC5: Town Centre First; Policy H2: Key Housing Sites; Policy H3: Housing Typologies; Policy H3b: Densification, Infill Opportunities and Small Sites; Policy H3c: Town Centre Residential Sites; Policy H3d: Upward Extensions; Policy H3e: Conversions from Commercial/Non-Residential Uses; Policy H3f: Open Spaces; Policy H4: Future Housing Mix; Policy H5: Affordable Housing; Policy H6: Build to Rent; Policy H7: Self and Custom Build; Policy GI1: Green Infrastructure; Policy GI3: Biodiversity and Net Gain; Policy SDC1: Sustainable Design and Construction; Policy SDC2: District Energy Networks; Policy SDC3: Tackling Water Stress; Policy ST1: Development and Requirements for Sustainable Transport; Policy ST3: Improving Rail Stations.            In all of these cases, the cross-referencing is to minimise repetition and to support the successful implementation of the Local Plan, when applied as a whole.</p>

<p><b>KEY QUESTIONS</b></p>		<p><b>Assessment</b></p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		-2	-1	0	+1	+2
<p><b>48.</b></p>	<p>Based on the above, have you tried to avoid unnecessary repetition (of the NPPF or other policies within the local plan policies update) and cross referencing in policies?</p> <p>If you find duplication or repetition you may want to take minute to consider whether this is appropriate.</p>	<p>No, we do not meet this requirement</p>	<p>No, we may not fully meet this requirement</p>	<p>Unclear whether our plan meets this requirement or not</p>	<p>Yes, we are likely to meet this requirement</p>	<p>Yes, we are confident our plan will meet this requirement</p>
	<p><b>Reason for score: +2</b>                      No policies repeat other policies within the Plan.                      NPPF guidance has been expressed where this is appropriate on a local level. This ensures that the standards the Local Plan is based on are clear and consistent.                      Cross referencing of policies within the Local Plan has been used where necessary for clarity to avoid repetition, but only used where it is essential for the successful implementation of the Plan.</p>					
	<p><b>Implications of taking no further action:</b></p>					
	<p><b>Mitigation / Action required (if necessary) to move scale to right:</b></p>					
	<p><b>Reviewer Comments:</b></p>					
	<p><b>49.</b></p>	<p>Do policies avoid duplicating other regulatory requirements (for example, building regulations)?</p>	<p>No, we do not meet this requirement</p>	<p>No, we may not fully meet this requirement</p>	<p>Unclear whether our plan meets this requirement or not</p>	<p>Yes, we are likely to meet this requirement</p>
<p><b>Reason for score: +2</b>                      Regulatory requirements are referred to or set out in the Local Plan where this is considered locally appropriate for the Crawley context and is supported by evidence.</p> <ul style="list-style-type: none"> <li>• Policy DD3: Standards for All New Dwellings (including conversions) includes internal space standards;</li> <li>• Policy DD2: Inclusive Design includes reference to accessibility standards;</li> <li>• Policy SDC1: Sustainable Design and Construction has been prepared to reflect national standards;</li> <li>• Policy SDC3: Tackling Water Stress includes reference to Optional Standards for water.</li> <li>• Standards for electrical vehicle charging are set out in the Parking Standards Annex.</li> </ul> <p>This is for the purposes of clarity and certainty.</p>						
<p><b>Implications of taking no further action:</b></p>						
<p><b>Mitigation / Action required (if necessary) to move scale to right:</b></p>						
<p><b>Reviewer Comments:</b></p>						

<b>KEY QUESTIONS</b>		<b>Assessment</b>				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
<b>50.</b>	<p><b>Does the wording of plan policies avoid ambiguity? Are requirements clear to the decision-maker?</b></p> <p><b>[For instance, policies should avoid using overly subjective terms such as “to the Council’s satisfaction”, “considered necessary by the Council” or “appropriate” without associated clarification.]</b></p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p><b>Reason for score: +2</b></p> <p>The policies in the Local Plan have been considered by the Development Management Team and assessed against clarity and implementation. Further context is provided in the supporting text and the Local Plan should be read as a whole. The starting point for the Local Plan Review was the adopted Local Plan (2015-2030). The Authority’s Monitoring Report has monitored the success of policy implementation since its adoption. Some of the issues identified with policy implementation was acknowledged to be solved by clearer policy wording. These issues have been addressed through the Local Plan Review.</p> <p>The Crawley Borough Local Plan is clear and positively worded. It reflects the requirements set out in national policy.</p>				
		<b>Implications of taking no further action:</b>				
		<b>Mitigation / Action required (if necessary) to move scale to right:</b>				
		<b>Reviewer Comments:</b>				

<b>Date of assessment:</b>	25/7/23
<b>Assessed by:</b>	Strategic Planning Team, Crawley Borough Council
<b>Checked by:</b>	Natalie Bramha-Pearl, Chief Executive, Crawley Borough Council
<b>Overall Score:</b>	91
<b>Comments:</b>	The council believes the Crawley Borough Local Plan is the sound and legally compliant Plan for the borough over the Plan period.