

CRAWLEY BOROUGH COUNCIL

SUSTAINABILITY APPRAISAL / STRATEGIC ENVIRONMENTAL ASSESSMENT OF THE CRAWLEY BOROUGH LOCAL PLAN: CRAWLEY 2030

Post Adoption Statement

December 2015



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1. Introduction

- 1.1 Crawley Borough Council adopted the Crawley Borough Local Plan 2015 – 2030 (Crawley 2030) on 16 December 2015.
- 1.2 This 'Post-Adoption Statement' meets Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations, 2004. It sets out how the Crawley Borough Local Plan has been prepared in accordance with the requirements of these Regulations.
- 1.3 Section 19 of the Planning and Compulsory Purchase Act, 2004, requires local planning authorities to carry out Sustainability Appraisal (SA) for all Development Plan Documents to ensure that the plan is designed in a suitable manner. This process involves examining the likely effects of the 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 practice.
- 1.4 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. The process involves examining the environmental impacts, including the mitigation of negative environmental impacts of specific plans and programmes.
- 1.5 During the Local Plan's preparation the SA and SEA processes have been undertaken in parallel. Any further reference to SA in this statement should be assumed to incorporate SEA simultaneously.
- 1.6 In accordance with these regulations¹, this statement sets out:
 - (a) how environmental considerations have been integrated into the Local Plan;
 - (b) how the environmental report has been taken into account;
 - (c) how opinions expressed in response to public consultation² have been taken into account;
 - (d) the reasons for choosing the plan as adopted, in light of the other reasonable alternatives dealt with; and
 - (e) the measures that are to be taken to monitor the significant environmental effects of the implementation of the Local Plan.

¹ Statutory Instrument 2004 No. 1633, Environmental Protection, The Environmental Assessment of Plans and Programmes Regulations 2004, Part 4: Post-Adoption Procedures

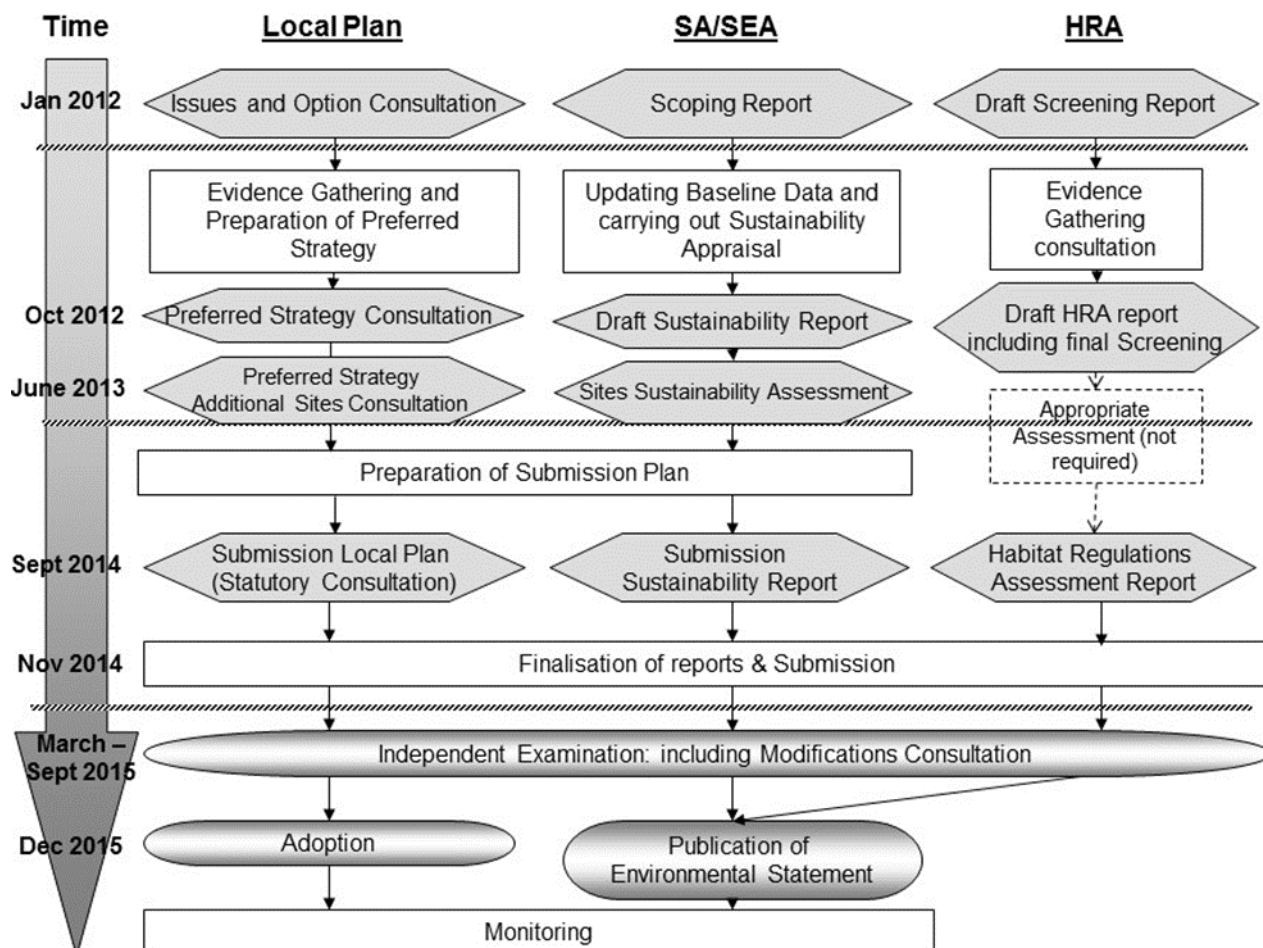
² Regulation 13(2)(d) and 13(4)

2. Environmental Statement

(a) How the environmental considerations have been integrated into the Crawley Borough Local Plan:

2.1 Figure 1³ illustrates how the processes of the SA/SEA have been undertaken alongside the Local Plan to ensure maximum and genuine integration of the issues into the Plan's preparation.

Figure 1: SA/SEA and HRA production with the Local Plan



2.2 In order to carry out the SA and SEA of the Local Plan, key topic areas and sustainability objectives were established early in the process, initially as part of the Core Strategy Review Issues and Options Topic Papers in 2009, and then again as part of the Crawley Local Plan Issues and Options in 2012. These were accompanied by a set of questions, highlighting the main issues for consultation.

2.3 The main topic areas identified for consideration by the SA/SEA for the borough during the preparation of the Local Plan, covered:

- A. Climate Change, Sustainability, Sustainable Design and Construction;
- B. Heritage, Character, Design and Architecture;
- C. Housing;

³ Sustainability Appraisal/Strategic Environmental Assessment: Sustainability Report for the Local Plan; Figure 3.2, p18 (December 2015) CBC

- D. Economy;
- E. Natural Environment;
- F. Transport and Infrastructure;
- G. Population, Community Facilities and Open Spaces, Crime and Health of the Community.

2.4 Information was collected and analysed to establish the 'baseline data' for the borough. This was initially published in the Scoping Report (2012) alongside the Issues and Options consultation with the Local Plan. This information was collected from monitoring carried out in the past along with other sources, and enabled the key sustainability issues facing the borough to be identified. These issues are set out in Table 1⁴ below:

Table 1: Crawley's Sustainability Issues	
Pollution	Crawley's role as an economic hub and transport interchange means the town's contribution to air pollution and climate change is likely to increase.
Climate Change	Crawley as a dense urban area has a high level of anticipated development, whilst also being identified as an area of radiant energy and subject to serious water stress.
Waste	Crawley has no strategy for managing commercial and industrial waste.
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.
Sewerage	The potential for development to be concentrated in Crawley may lead to sewerage capacity problems.
Air Quality	In the context of an expanding town and the international airport, maintenance of air quality may become increasingly problematic.
Noise	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 complicated by the uncertainty surrounding the future expansion of Gatwick Airport.
Attractiveness	There is a need to ensure Crawley remains a place where people want to live and invest, in order to enhance the quality of life and encourage economic growth.
Housing Delivery	The economic downturn has seriously affected the delivery of new housing in recent years, although that trend may be changing as the economy improves.
Housing Stock	The housing stock does not match the need and aspirations of the borough over the next 20 years.
Affordable Housing	Affordable housing provision does not match the level of need.

⁴ Sustainability Appraisal/Strategic Environmental Assessment: Sustainability Report for the Local Plan; Table 4.2, p23 (December 2015) CBC

Land Supply	Land supply in the borough is limited.
Building Stock	There is a mismatch between the existing older building stock and the current needs of the changing economy, both within the dedicated business areas and the town centre.
Skills Gap	Local skills do not match the requirements of local businesses, resulting in significant in-commuting to the borough from surrounding areas.
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.
Competitiveness	The retail sector of the town's economy has been declining in recent years and there is capacity for a step change improvement in the quality the town centre.
Green Infrastructure	The lack of development land is increasing the threat to natural areas, open spaces and green infrastructure within the urban environment.
Biodiversity	Development in the borough will impact on biodiversity, fauna, flora and soil.
Traffic Demand	The growth of the town will increase pressures on transport infrastructure that is already approaching capacity.
Infrastructure provision	The rate of development, particularly residential, requires careful management to ensure that it does not outstrip the borough's infrastructure provision.
Community Facilities	The changing population demographics in the area is creating a mismatch between the need for housing and community facilities and current provision.
Ethnic Diversity	The ethnic structure of the population within 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, but early years' provision in the borough is poor. Those leaving education are not able to participate fully in the local economy.
Crime	There is a need to reduce crime and the perception of crime.
Health	Physical activity in the borough is below average.

- 2.5 The SA/SEA process involved identifying and analysing all the plans, programmes and policies that could impact upon the Local Plan. These include documents from international to local levels. The documents also provided further information about the borough which were included in the baseline data.
- 2.6 A set of Sustainability Objectives were identified, against which the policy and allocation options in the Local Plan were assessed:
1. To mitigate climate change, by taking actions to reduce the concentration of greenhouse gasses in the atmosphere.
 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.

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.
 4. To ensure that everyone has the opportunity to live in a decent and affordable home.
 5. To maintain, support and promote a diverse employment base that can serve the local and sub-regional and regional economy.
 6. To conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough.
 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.
 8. To ensure the provision of sufficient infrastructure to meet the requirements of the borough.
 9. To promote healthy, active, cohesive and socially sustainable communities.
 10. To ensure everyone has the opportunity to participate in sport and to encourage active lifestyles.
- 2.7 These were compared with each other and against the overall objectives and Vision of the Local Plan. This process allowed any conflicts between the objectives to be identified and enabled possible ways of reducing or resolving conflicts to be found.

(b) How the Environmental Report (Sustainability Appraisal Reports 2012 – 2015) has been taken into account:

- 2.8 The SA/SEA has been an iterative process, carried out concurrently with the preparation of the Crawley Borough Local Plan. The Sustainability Report for the Local Plan has been a key output of the Plan's preparation process.
- 2.9 Each policy and site allocation option was considered, alongside the reasonable alternatives, against the Sustainability Objectives. The SA/SEA has been used as a guide to inform the decision making process when developing the Local Plan and has been considered by decision makers and members of the public.
- 2.10 The SA/SEA has been reviewed, updated and published for comment alongside each of the key stages of the Local Plan's preparation, including continued assessment of the proposed Modifications during the examination of the Local Plan.
- 2.11 The SA/SEA process began in 2009 with the publication of Topic Paper 13: Sustainability Appraisal/Strategic Environmental Assessment and Habitat Regulations Assessment, this was based on an initial scoping report which identified the key issues and sustainability objectives to be considered. An updated Topic Paper accompanied the public consultation on the Scoping Report in January 2012, alongside the Local Plan's Issues and Options consultation.
- 2.12 The significant effects of the Plan's preferred and alternative policies were considered against the Sustainability Objectives using the following simplified criteria:

	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 (--)

- 2.13 Detailed assessment of each of the reasonable alternative options was provided for each proposed Local Plan policy. Following the assessments of each policy, the results were tabulated, which meant it was possible to identify complementary policies and areas of conflict. The mitigation measures necessary to address negative impacts were identified. In considering the policy options available to the council, planning officers endeavoured to ensure that the most sustainable option was preferred, unless other considerations dictated (for example, the most sustainable option could threaten the economic viability of new development within the Plan or the option could be non-compliant with planning legislation or national policy). The chosen option was highlighted for each policy. A draft Sustainability Report was published to accompany the Local Plan Preferred Strategy in October 2012.
- 2.14 A site specific Sustainability Appraisal accompanied the Additional Sites Consultation in June 2013. The assessment allowed for clear reasoning and balancing between the sustainability objectives to lead to the decisions for allocation, further work and rejecting site proposals and the designation of policy protections.
- 2.15 The Crawley Borough Local Plan has been informed by an extensive range of background evidence studies and technical assessments. Public engagement has also been an essential component of the process, including consultation, both directly and indirectly, on the Sustainability Appraisal. These were integrated into the Local Plan and helped in the evaluation of alternative options. New options were identified and assessed as changes in circumstances created them. The findings of the emerging Sustainability Appraisal was presented to the council members at each of the key reporting stages in the Local Plan's preparation alongside the Local Plan.
- 2.16 Chapter 5 of the Sustainability Report describes the appraisal process upon the submission Local Plan policies and site allocations/designations. This is supported by Appendix E which explains the assessment of options for the Vision and Spatial Strategy. Appendix F sets out the analysis of alternative options for the submission Local Plan Policies and for each option appraised the outcome on the Local Plan is documented. Appendix G assesses each of the sites against the sustainability criteria.
- 2.17 The submission Sustainability Report was published alongside the submission Local Plan and submitted to the Planning Inspectorate together with the Crawley Borough Local Plan in November 2014. The Planning Inspector took into account the findings of the Sustainability Appraisal Report as part of the Examination Process. A Sustainability Report for the Modifications Local Plan was published in June 2015 which assessed the policies subject to modification through the examination process. The Inspector's final report confirmed that *"Importantly, the Plan is underpinned by a thorough and robust evidence base which has informed its policies, and has been subject to a detailed sustainability appraisal which has examined*

*realistic alternative strategies*⁵ and concluded that the “SA has been carried out and is adequate”⁶.

- 2.18 Following receipt of the Inspector’s Report into the Local Plan a final version of the Sustainability Report (December 2015) was published alongside the final Local Plan incorporating the Inspector’s Main Modifications and the council’s additional modifications.

(c) How opinions expressed as a result of public consultation on the Sustainability Appraisal been taken into account:

- 2.19 In 2009, as part of the Core Strategy Review, a Topic Paper specifically relating to the Sustainability Appraisal/Strategic Environmental Assessment and Habitat Regulation Assessment was consulted on. This set out an indication of the proposed direction at that stage and a number of key questions setting out the main issues for consultation. 16 representations were received in relation to this Topic Paper. The comments received were responded to and taken forward into the preparation of the Scoping Report. The comments and officer responses are set out in Appendix 1 of the Statement of Consultation to the Local Plan (November 2014).
- 2.20 The Topic Paper was updated and re-issued during the Local Plan Issues and Options consultation in early 2012, alongside the Scoping Report. The council received six responses to the Sustainability Appraisal. The comments received and officer responses are set out in Appendix 2 of the Statement of Consultation to the Local Plan (November 2014) and Appendix B of the Sustainability Report (December 2015). The consultation responses proposed:
- Minor modifications to indicators;
 - Additional plans and policies that should be considered; and
 - Proposals for policy options that should be included in the Appraisal.
- 2.21 From this information, the Sustainability Objectives were identified, against which the proposed Local Plan policy options were assessed. The draft Sustainability Appraisal was published for public consultation between 22 October and 3 December 2012, alongside the Local Plan Preferred Strategy. The consultation responses proposed additional plans and policies that could be incorporated within the SA and suggested reasons why certain policies should be addressed differently against the SA objectives. The council received two responses to the Sustainability Appraisal. The comments received and officer responses are summarised in Appendix 3 of the Statement of Consultation to the Local Plan (November 2014) and Appendix C of the Sustainability Report (December 2015). These comments fed into the preparation of the Sustainability Appraisal report for the Submission Local Plan, and consequently the preparation of the Submission Local Plan.
- 2.22 The council received feedback on an additional sites consultation, carried out between 3 June and 1 July 2013, which also had an accompanying site specific Sustainability Appraisal based upon the draft SA report with the Local Plan Preferred Strategy. Although a large number of representations were received at this stage, there were no specific comments regarding the accompanying SA.

⁵ Report on the Examination into Crawley Borough Local Plan 2015-2030; para 19, p7 (2 November 2015) Inspector Martin Pike BA MA MRTPI

⁶ Report on the Examination into Crawley Borough Local Plan 2015-2030; para 114, p31 (2 November 2015) Inspector Martin Pike BA MA MRTPI

- 2.23 Three representations were received to the submission draft Sustainability Appraisal, which was subject to public consultation between 1 September and 13 October 2014. These are set out in Appendix 6 of the Statement of Consultation to the Local Plan (November 2014). These were submitted directly to the Planning Inspector as part of the Local Plan submission documents, on 26 November 2014, for his consideration into the examination of the Crawley Borough Local Plan.
- 2.24 A Sustainability Report for the Modifications Local Plan was produced in June 2015, and consulted upon between 1 July and 12 August 2015. This assessed those policies subject to Main Modifications through the examination process. Where the modifications affected the options appraised through the SA/SEA, the policy and/or allocation was re-assessed and the conclusions were set out as tracked changes in the Modifications version of the Sustainability Report. No representations were received directly in relation to the Sustainability Report as part of this consultation.
- 2.25 At each of the above formal stages of public consultation, statutory consultees were notified of the process. The following specific statutory and locally significant partners were approached directly to assist with the Sustainability Appraisal of Options, the Preferred Option for the Local Plan and the final submission Local Plan:
- Natural England
 - Environment Agency
 - English Heritage (Historic England)
 - Highways Agency (Highways England)
 - NHS Sussex (Crawley CCG)
 - West Sussex County Council Transport and Infrastructure
 - West Sussex County Council Education
 - West Sussex County Council Minerals and Waste
 - Crawley Borough Council Development Management
 - Crawley Borough Council Corporate Policy
 - Crawley Borough Council Environmental Health
 - Crawley Borough Council Housing
 - Minority Forums for Older People; Ethnic Minorities; Disabled People and Young Mothers.
- 2.26 Full details on the public consultations are set out in the Statement of Consultation to the Local Plan (November 2014) and paragraphs 2.14-2.24 and 4.5-4.14 of the final Sustainability Report (December 2015).

(d) Reasons for choosing the Local Plan as adopted, in light of other alternatives:

- 2.27 The development of options was considered during the earliest stages of the plan preparation, starting with the Core Strategy Review Issues and Options topic papers and the reviewed and updated Issues and Options for the Local Plan in 2012, each setting out strategic options for the key topic areas being considered. The questionnaires issued as part of the early 2012 consultation asked high level questions to influence the direction of the priorities for the Local Plan. The responses from these early consultations directly influenced

the development of the Crawley 2030 Vision⁷, from which the Local Plan objectives⁸ and strategy were formed.

- 2.28 The strategic spatial strategy was assessed against the sustainability objectives following results from consultation and technical evidence base information. The outcome of the final option chosen for the Spatial Strategy was a combination of Scenario 2 (Sub-Regional Focus) and 3 (Crawley borough Focus). The negative effects associated with each option were mitigated and minimised as far as possible. It was, therefore, considered to be the most appropriate strategy when considered against the reasonable alternatives: *“A combination of Scenarios 2 and 3 were 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”*⁹.
- 2.29 The assessment of the Local Plan policies found that policies generally 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 within the borough. The main findings from the Sustainability Appraisal were as follows:
- The policies protecting the environment and the character of the borough work harmoniously to protect both the built and natural environment of the borough. However, the combined effect of these policies limits the overall amount of land which is available for development.
 - Key housing sites and employment areas have been identified within the Local Plan to meet as much of the objectively assessed needs for 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. The effects of policies on levels of crime, or the decisions of private enterprises to locate within the town, are only partly based on planning policies contained within the Local Plan.
 - The majority of policies have combined to have an overall positive impact for the economy. It is clear from the evidence base that the policies directly protecting employment sites will assist the local and sub-regional economy, and policies protecting the environment and character of Crawley will sustain the borough’s attractiveness, thereby encouraging people to live and work in Crawley.
- 2.30 Once the individual and joint impacts of policies within the Local Plan had been assessed, the most significant impacts were identified. The most significant effects arising from the Local Plan are as a result of new development to meet needs (predominantly housing and employment needs). Significant effects arising from the Local Plan include the potential harm to the environmental designations (such as the High Weald Area of Outstanding Natural Beauty) and an increase in infrastructure needs (such as transport,

⁷ Crawley Borough Local Plan, Crawley 2030: A Vision, p13 (December 2015) CBC

⁸ Crawley Borough Local Plan, Appendix B: Local Plan Objectives & Planning Policy Context, p129-130 (December 2015) CBC

⁹ Sustainability Appraisal/Strategic Environmental Assessment; Sustainability Report for the Local Plan, para 5.7, p29 & Appendix E: Vision and Spatial Strategy Issues and Options, Policy Options: Spatial Strategy and Vision, Chosen Option, p110 (December 2015) CBC

education or health facilities) owing to new development. More beneficial impacts include an increase in the number of affordable homes, and the maintenance and improvement of the character of Crawley, through the policies protecting the neighbourhood principle approach.

- 2.31 Chosen policy options with negative impacts identified were considered further for mitigation measures. These included:
- Other policies within the Local Plan have the potential to counteract the negative impacts 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 (SPD) and Development Briefs;
 - Environmental impacts can be mitigated against at the planning application stage, through an in-depth biodiversity report and/or an Environmental Impact Assessment (EIA). Planning conditions will also play a role in ensuring potential negative effects of development are resolved.
- 2.32 As a post-war new town, within a tightly constrained urban borough with high levels of objectively assessed development needs, and an international airport within its administrative boundaries, appraisal of the realistic alternative options highlighted tensions between the Sustainability Objectives. The Sustainability Appraisal process was undertaken continuously throughout the plan-making process, particularly as new evidence was gathered to support the Local Plan policies, ensuring the chosen options were tested and amended accordingly to ensure the Local Plan provides a robust and justified, sustainable approach to development within the borough over the Plan period.

(e) Measures for Monitoring

- 2.33 The Sustainability Report sets out the monitoring indicators identified to monitor the effects of the Plan against the Sustainability Objectives¹⁰.
- 2.34 The Local Plan is accompanied by the Crawley Borough Local Plan Monitoring and Implementation Framework, which sets out in detail how the objectives and policies of the Local Plan will be monitored and the actions that will be taken if monitoring indicates that they are not being implemented. This document commits the council to publishing its Authority's Monitoring Report (AMR), on an at least annual basis, although updates will not be restricted where further information is available sooner. The results will feed into subsequent reviews of the Local Plan and other immediate actions taken, including liaison with partners such as landowners, developers, infrastructure providers, funding bodies and local employment, environmental and social groups.
- 2.35 The AMR will also cover monitoring of the Sustainability Appraisal objectives in order to measure any significant social, economic and environmental effects after the Local Plan adoption. This will allow the identification of any unforeseen adverse effects and enable appropriate remedial action to be taken.

¹⁰ Sustainability Appraisal/Strategic Environmental Assessment: Sustainability Report for the Local Plan; Table 4.3, p24 (December 2015) CBC

3. Further Information

- 3.1 The following documents referred to in this statement can be accessed on our website: www.crawley.gov.uk/crawley2030
- Crawley 2030: Crawley Borough Local Plan 2015 – 2030 (December 2015) [Crawley Borough Local Plan](#)
 - Crawley 2030: Local Plan Map (December 2015) [Local Plan Map](#)
 - Crawley Local Plan Inspector’s Final Report (2 November 2015) [Crawley Local Plan Report final](#) [CBLP Main Modifications Appendix](#)
 - Sustainability Appraisal/Strategic Environmental Assessment: Sustainability Report for the Local Plan (December 2015) www.crawley.gov.uk/pw/web/PUB271703
 - Crawley Local Plan Statement of Consultation & Appendices 1 – 8 (November 2014 and August 2015 update) [LP004 Crawley Local Plan Statement of Consultation](#) (November 2014)
[Appendix 1](#) – early consultation (Core Strategy)
[Appendix 2](#) – early consultation (Issues & Options)
[Appendix 3](#) – early consultation (Preferred Options)
[Appendix 4](#) – early consultation (Additional Sites)
[Appendix 5](#) – submission consultation
[Appendix 6](#) – submission consultation
[LP004a Consultation Statement](#) (August 2015)
[Appendix 7 Modifications Consultation: Communications and Advertising Material](#)
[Appendix 8 Modifications Consultation: Representations Received](#)
 - Sustainability Appraisal of the Local Plan Preferred Strategy Additional Sites Consultation Document (2013) [LP029 Sustainability Appraisal of the Local Plan Preferred Strategy Additional Sites Consultation Document](#)
 - The Crawley Borough Local Plan 2014 – 2029 Preferred Strategy Consultation Draft (2012) [LP028 The Crawley Borough Council Local Plan 2014 – 2029 Preferred Strategy Consultation Draft](#)
 - Sustainability Appraisal/Strategic Environmental Assessment: Draft Sustainability Report for Consultation with Local Preferred Strategy (2012) [LP030 Crawley Borough Council Sustainability Appraisal/Strategic Environmental Assessment: Draft Sustainability Report for Consultation with Local Preferred Strategy](#)
 - Sustainability Assessment Scoping Report (2011) [LP031 Sustainability Assessment Scoping Report](#)
 - Crawley 2029 Issues and Options Topic Paper 12: Sustainability Appraisal/Strategic Environmental Assessment and Habitat Regulations Assessment (2012) [Topic Paper 12](#)
 - Shaping the Future of Crawley – Core Strategy Review Topic Paper 13: Sustainability Appraisal/Strategic Environmental Assessment and Habitat Regulations Assessment (2009) [Topic Paper 13](#)