

# **CRAWLEY BOROUGH COUNCIL LOCAL PLAN REVIEW**

## **SUSTAINABILITY APPRAISAL / STRATEGIC ENVIRONMENTAL ASSESSMENT**

### **SCOPING REPORT**

**&**

### **DRAFT REPORT**

**JULY 2019**

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## **1.0 INTRODUCTION**

### **Sustainability Appraisal and Strategic Environmental Assessment**

- 1.1 Under the regulations of The Planning and Compulsory Purchase Act 2004 Crawley must carry out Sustainability Appraisal (SA) of the Local Plan to satisfy independent examination and allow the Plan to be formally adopted. An EU Directive also requires that Strategic Environmental Assessment (SEA) is carried out to ensure that the environmental effects of the Plan are taken into account. The SA/SEA is an ongoing process, which attempts to identify the social, environmental and economic impacts of planning policies and allocations.
- 1.2 The SA/SEA process will consider the impacts of proposed development options on people's health, and covers the criteria of Health Impact Assessment. The Local Plan seeks to promote opportunities for all people in Crawley. The SA/SEA will also consider the potential effects of the Plan on people in respect of disability, gender and racial equality impacts, in light of the Equalities Act 2010.
- 1.3 This scoping report outlines the sustainability issues and objectives for Crawley, for consideration during the review of the adopted Crawley Borough Local Plan<sup>1</sup>. The Review will take into account the revised National Planning Policy Framework 2019, technical evidence and consultation feedback, and will result in a revised Local Plan for Crawley for the period 2020 – 2035.
- 1.4 The SA/SEA follows an iterative process, providing a view of the likely implications for sustainable development of different options for policy identified during the review of the Local Plan. The findings of the scoping work will be taken into consideration when finalising the Crawley Local Plan 2020 – 2035.

### **Structure of the Scoping Report**

- 1.5 This SA/SEA scoping report is structured as follows:
  - Section 2 gives a summary of the report, the methodology proposed for Sustainability Appraisal of the Local Plan, and the plan area.
  - Section 3 provides an introduction to the SA process and explains how the SEA requirements have been incorporated. The Local Plan/SA production timetable is outlined.
  - Section 4 describes social (including health), environmental and economic issues of significance in Crawley; baseline data and relevant plans policies and programmes. The data is presented by topic, with a summary of key issues identified and list of Sustainability Objectives at the start of the section.
  - Section 5 provides detail on the next steps of the SA/SEA process including identifying a monitoring framework, undertaking Appraisal of Local Plan options and the proposed structure of the Sustainability Report.

### **Consultation Arrangements**

- 1.6 Consultation on the Scoping Report is running alongside early engagement consultation on the Local Plan Review, and a Draft Habitats Regulations Assessment Screening Report. Feedback from the consultations will be used to inform the preparation of the submission publication Local Plan, Sustainability Appraisal, and any further work on Habitats Regulations Assessment (HRA).
- 1.7 The document will be available for an eight week public consultation period commencing 15 July 2019. We welcome any comments on this Scoping Report. Specific questions are provided throughout the document to guide consultation

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<sup>1</sup> [Crawley 2030: Crawley Borough Local Plan 2015 – 2030](#)

responses, and are also quoted at Appendix A. Should you wish to comment on the document, please do so on or before **5pm on 16 September 2019**.

- 1.8 There are three ways in which representations can be submitted:
  - Electronically using the dedicated webpage: [www.crawley.gov.uk](http://www.crawley.gov.uk)
  - Electronically by email to [forward.plans@crawley.gov.uk](mailto:forward.plans@crawley.gov.uk)
  - By post to Strategic Planning, Crawley Borough Council, Town Hall, The Boulevard, Crawley, West Sussex, RH10 1UZ.
- 1.9 For further information about the Sustainability Appraisal and Strategic Environmental Assessment, please contact Elizabeth Brigden on (01293) 438624 or e-mail [forward.plans@crawley.gov.uk](mailto:forward.plans@crawley.gov.uk)
- 1.10 The Sustainability Appraisal/Strategic Environmental Assessment can be viewed on the council's website at [www.crawley.gov.uk](http://www.crawley.gov.uk)
- 1.11 Hard copies of the documents are also available to view at:

**Town Hall:** The Boulevard, Crawley, West Sussex, RH10 1UZ. Phone 01293 438000  
Opening hours: Monday to Friday 8.30 am - 5.00 pm

**Crawley Library:** Southgate Avenue, Southgate, Crawley, RH10 6HG.  
Phone 01293 651744. Opening hours: Monday to Friday 9.00 am -7.00 pm Saturday 9.00 am -5.00 pm

## 2.0 CONTEXT AND METHODOLOGY

### Introduction to Sustainable Development

- 2.1 The most widely used definition for sustainability is taken from the Brundtland Report, which was produced by the United Nations World Commission on Environment and Development in 1987. It defines sustainable development as:  
*"development that meets the needs of the present without compromising the ability of future generations to meet their own needs."*
- 2.2 The aim of sustainable development is to enable everyone to satisfy their basic needs and enjoy a better quality of life, without compromising the quality of life of future generations. It is about considering long-term social, economic and environmental issues and impacts in an integrated and balanced way.

### Strategic Environmental Assessment and Sustainability Appraisal

- 2.3 Section 39 of the Planning and Compulsory Purchase Act 2004, requires Local Development Documents (LDD) to be prepared with a view to contributing to the achievement of sustainable development. The requirement for a SEA is originally set out in the European Directive 2001/42/EC, which was adopted into UK law as the "Environmental Assessment of Plans and Programmes Regulations 2004". A SEA ensures that the environmental effects of certain plans and programmes, including land-use plans are taken into account.
- 2.4 The aim of the SA is to ensure that the Local Plan is as sustainable as possible. The process involves examining the likely effects of the plan and considering how they contribute to environmental, social and economic wellbeing. Where problems are identified mitigation measures can be proposed and put in place. These processes can therefore improve the overall sustainability of the plan being prepared.
- 2.5 As the SA and SEA processes are so similar, they have been undertaken together and for ease of reference, this document will refer to both processes as a SA. However, government guidance suggests that the SA should identify where the requirements of SEA have been met. This scoping report will only need to meet those requirements which relate to the early stages of the SEA process. Table 2.1 sets out where the requirements of the SEA Directive have been met in this report. The remaining requirements will be covered in later stages of the process and will be included within the final SA submitted alongside the Local Plan.

**Table 2.1 SA/SEA Report and conformity with SEA Directives**

<b>SEA Directive Requirements</b>	<b>Location within Report</b>
<b>Annex 1 a</b> Outline of report contents Main objectives of the plan & relationship with other plans and programmes.	Section 1 Section 3, paragraphs 3.11 onwards & Chapter 4, sections titled 'Relevant Plans, Policies and Programmes'
<b>Annex 1 b</b> Current state of the environment & likely evolution there of without implementation of the plan.	Section 4, described for each issue identified and titled: 'Likely evolution without the continued implementation of the Local Plan'
<b>Annex 1 c</b> Environmental characteristics of areas likely to be significantly affected.	Sections 3 and 4

<b>SEA Directive Requirements</b>	<b>Location within Report</b>
<b>Annex 1 d</b> Existing environmental problems which are relevant to the plan, including, in particular, those relating to any areas of a particular environmental importance.	Section 4, on a topic and issue basis
<b>Annex 1 e</b> Environmental protection objectives, established at international, community or national level and the way those objectives and any environmental considerations have been taken into account during its preparation.	Section 4, on a topic basis, titled 'Relevant Plans, Policies and Programmes'

### **Habitats Regulations Assessments (HRA)**

- 2.6 A separate European Directive that relates to the Conservation of Natural Habitats and of Wild Fauna and Flora – the ‘European Habitats Directive’ (92/43/EEC) – requires an Appropriate Assessment (known as Habitats Regulations Assessment (HRA) in the UK) to be undertaken. HRA assesses the impact of land-use plans against the conservation objectives of European Sites within certain distances of the borough (15km has been used in the case of Crawley). The HRA ascertains whether the plan’s proposals would adversely affect the integrity of a site on its own, or in combination with the plans of neighbouring authorities.
- 2.7 In tandem with this SA Scoping Report, the Council has prepared a Draft HRA Screening Report. The findings of the Screening Report suggest that there is no significant likelihood of adverse impacts on protected sites from the implementation of the plan. However, since the exact scope and intensity of development of the Local Plan is still undetermined, and there is a need to consider fully the ‘in combination’ effects of the Plan alongside other Plans in the area, further investigation of the likely impacts of Options will be undertaken in consultation with statutory bodies including Natural England. The findings of this work will be published in a Draft HRA report for consultation with the SA Sustainability Report.

#### **Consultation Question:**

Having read the HRA screening report, do you feel that Appropriate Assessment of the impact of the implementation of the Local Plan is required?

### **Methodology**

- 2.8 As this Local Plan Review is a focused update and refresh of a recently adopted Local Plan, the strategic approach and many of the policies are intended to be retained from the currently adopted Local Plan. A Sustainability Appraisal/ Strategic Environmental Assessment was carried out previously, which evolved for every stage in the existing Plan’s preparation and adoption. The final SA/SEA (2015) was published on adoption of the Local Plan<sup>2</sup>. This SA/SEA will look to review the previous SA/SEA conclusions and update where changes are proposed. Where relevant new options will be considered against the approach taken in the adopted Plan.

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<sup>2</sup> [Sustainability Appraisal/Strategic Environmental Assessment Post Adoption Statement Sustainability Appraisal/Strategic Environmental Assessment](#) (December 2015)

- 2.9 As the first stage of the SA/SEA scoping of the Local Plan, the council has collected contemporary information on social, environmental and economic issues in the borough. This is known as the 'baseline' data. This information was collected from monitoring carried out in the past, and other sources, and enabled the key issues facing the borough today to be identified.
- 2.10 The next stage of the process has been to identify and analyse all plans, programmes and policies that could impact upon the Local Plan. These plans, programmes and policies include documents from international to local levels. The documents also provided further information about the borough, which were included in the baseline data.
- 2.11 From this information, Sustainability Objectives have been identified to assess the emerging policy options in the Local Plan against. The Sustainability Objectives will be confirmed following this consultation. They will be compared with each other and against the overall objectives of the Local Plan. This process will enable any conflicts between the objectives to be identified. By identifying these conflicts, possible ways of reducing or resolving conflicts between Local Plan policies and sustainable development will be found.
- 2.12 The SA is being prepared by Crawley's Strategic Planning Department who are also responsible for the development of the Local Plan. Internal and external stakeholders will be involved in the Sustainability Appraisal of the Local Plan. A list of statutory and proposed consultees is included at Appendix B.
- 2.13 The evidence base being prepared for the Local Plan will be used as the basis for the SA baseline data where appropriate. Evidence studies are still being developed and their findings will be incorporated within the SA baseline once complete.

### **Consultation Question:**

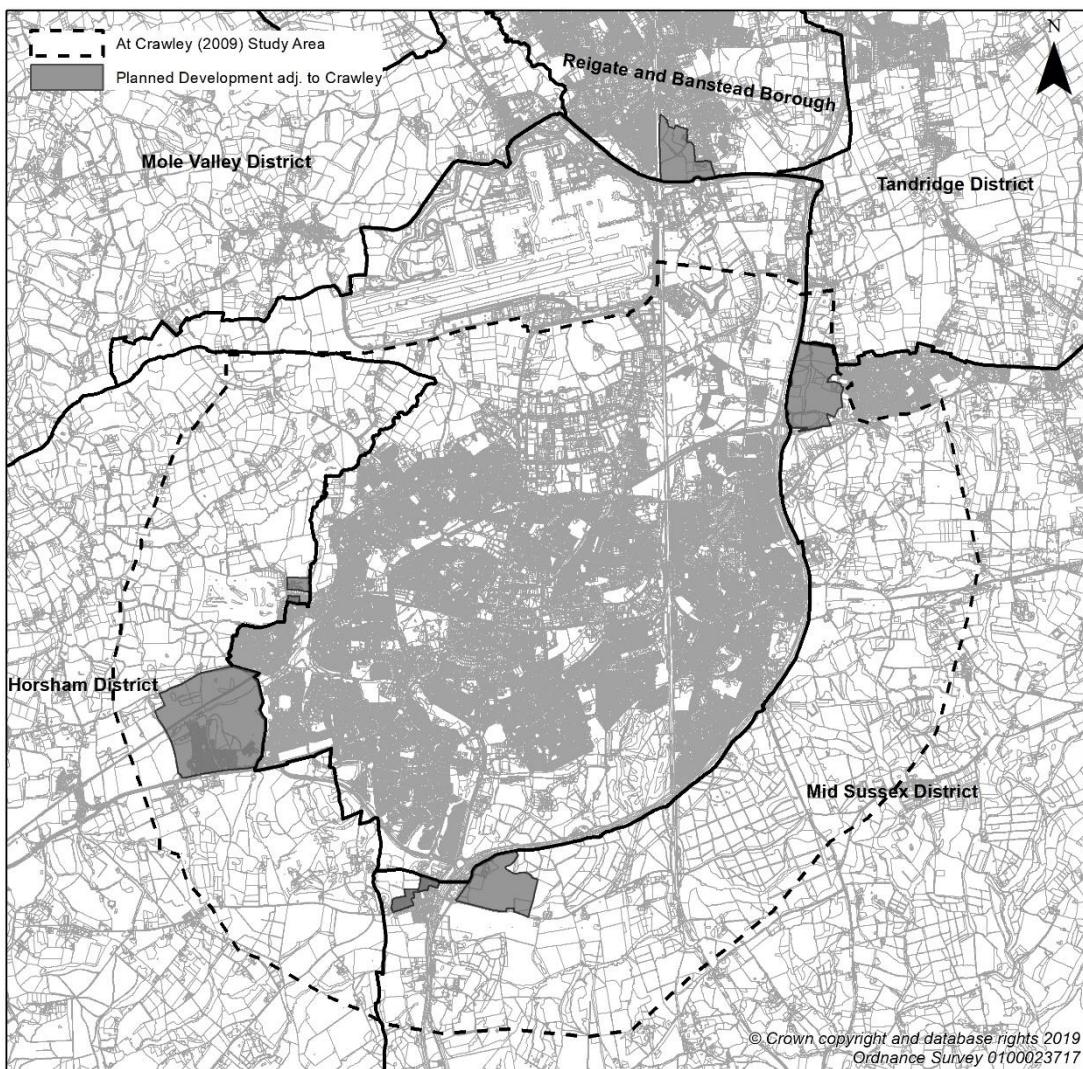
Will our proposed methodology appraise the social, environmental and economic impacts of development proposals in line with requirements for SA?

Are there any other groups with an interest in development in Crawley who we should involve in the process? (See Appendix B for a list of proposed list of consultation partners).

### **Plan Area**

- 2.14 Broadly speaking, the focus of the Local Plan will be upon Crawley Borough. However, further growth into neighbouring authorities cannot be ruled out at this stage if this is required and determined by neighbouring authorities. Therefore, whilst the SA/SEA undertaken for such developments would be the responsibility of the relevant Planning Authority in which the site is located, the baseline information and assessments undertaken for this SA scoping report could be applied to areas beyond the boundary of Crawley during the life of the Plan.
- 2.15 The area considered by the 2009 At Crawley study is shown below, along with the existing developments already taking place immediately adjacent to the borough's administrative boundaries. The 2009 study examined the potential for strategic development both within and beyond Crawley's boundary. This is shown to indicate the area that may be considered during the preparation of the Local Plan – both for development, and to indicate areas likely to be impacted by development. The extent of the Plan area will be kept under review and updated as appropriate in future consultations.

**Figure 2.1: SA Boundary - The Borough of Crawley**



## 3.0 OVERVIEW OF THE LOCAL PLAN

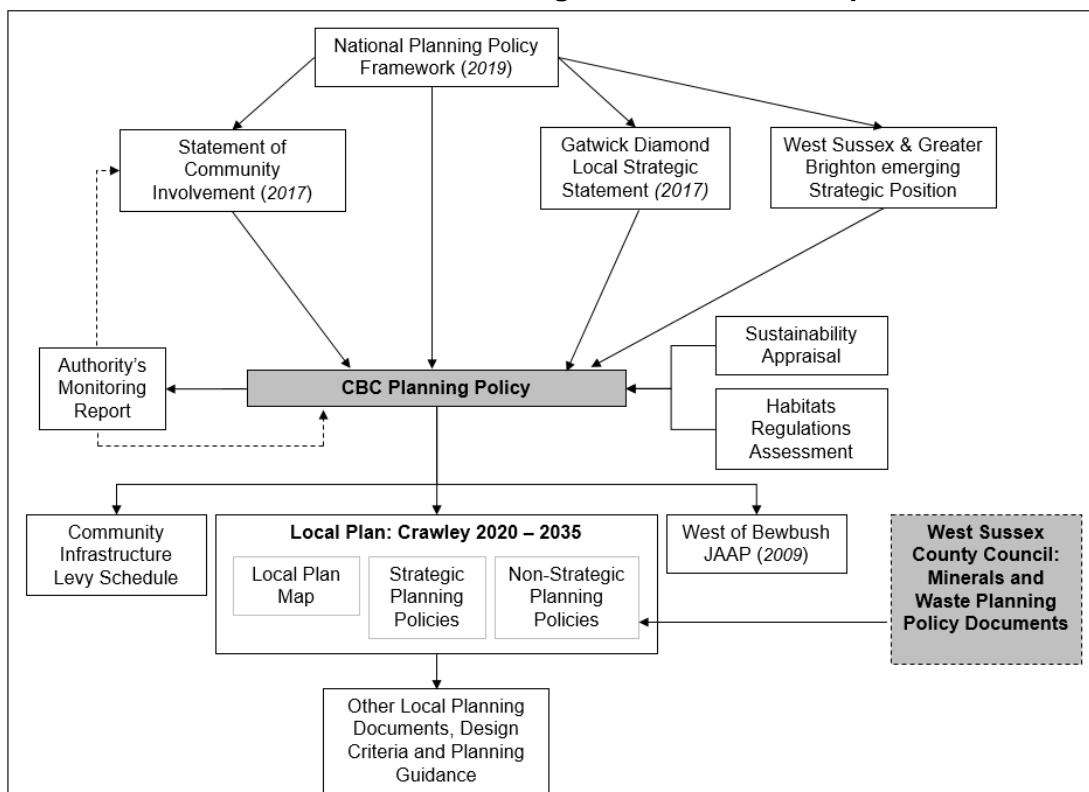
### Introduction

- 3.1 In light of the requirement for Local Planning Authorities to maintain up-to-date Plans and review these every five years, Crawley Borough Council is undertaking a refresh and update of its adopted Local Plan.
- 3.2 The Local Plan Review will consider changes to the National Planning Policy Framework in its recent revision<sup>3</sup> and updated local evidence.
- 3.3 The new Local Plan will continue to form a single document, which will set out the policies to guide both strategic development and development management over the period 2020 – 2035. These policies will replace the adopted Crawley Borough Local Plan 2015 – 2030 policies. A key aim of the Local Plan will be to ensure that the borough continues to develop sustainably.

### The Local Plan and National Planning Policy Framework (NPPF)

- 3.4 Crawley currently has an adopted up-to-date Local Plan (2015); the West of Bewbush JAAP (2009), and a number of Supplementary Planning Documents (SPD) that cover subjects including affordable housing, climate change, green infrastructure, town centre, urban design and Gatwick Airport. In addition, West Sussex County Council have adopted the Joint Minerals Local Plan (2018) and the Waste Local Plan (2014) which cover the Crawley borough area. A simplified diagram of the key documentation accompanying the adopted Local Plan is shown at Figure 3.1.

**Figure 3.1: Relationship between documents**



- 3.5 The Local Plan is informed by a wide range of requirements, recommendations and guidance from documents produced at an international level all the way down to a

<sup>3</sup> National Planning Policy Framework (2019) MHCLG

<https://www.gov.uk/government/publications/national-planning-policy-framework--2>

local level. Such documents include national planning policies which are provided in the form of the National Planning Policy Framework. Alongside this, the government publish an online system of planning practice guidance to support the implementation of the national policies.

- 3.6 The Local Plan will respond to changed economic circumstances affecting growth and employment. It will plan for changes to housing supply and demand influenced by the demographic needs and economic future of Crawley.

### **Crawley's Local Plan**

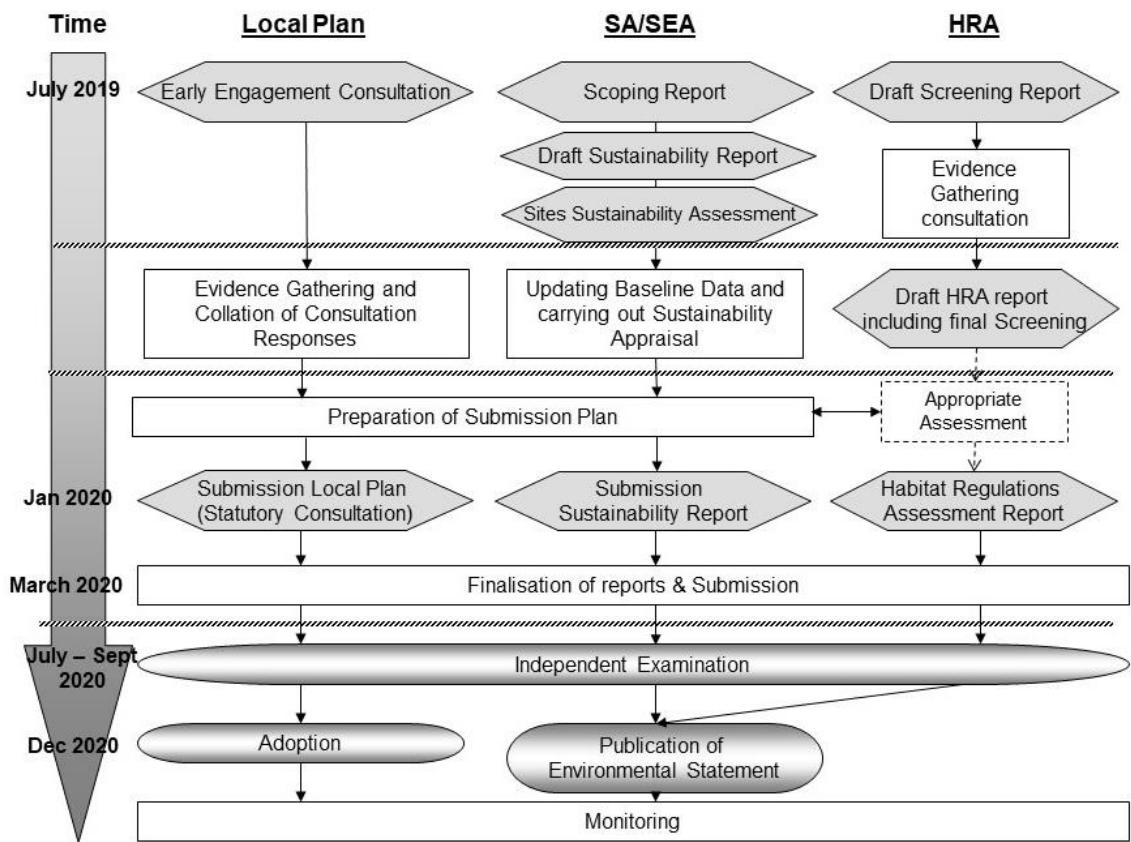
- 3.7 This SA Scoping Report is available for consultation in tandem with early consultation for the Local Plan Review. The Local Plan will address development proposals including the long-term housing and employment land supply position for the period up to 2035. It will include policies to guide the location and type of new development, and to protect valued elements of natural and built environment; and will set out plans for the implementation of infrastructure supporting it. Although the SA is being prepared in tandem with the Local Plan, its focus is not solely upon the Plan, but will be used to appraise all subsequent documents including SPDs.
- 3.8 The early review of the adopted Local Plan affords the council the opportunity to build upon the lessons learnt during the preparation of the existing Local Plan.
- 3.9 Within the Topic areas listed in the following chapter, the plans, and programmes most relevant are highlighted in detail. This area will continue to be developed as the Local Plan Review progresses, subject to the nature of the document being developed, to ensure the relationship between the plans, policies and programmes can be discussed in relation to the emerging Local Plan policies. The timetable for the adoption of the Local Plan is shown in Table 3.1.

**Table 3.1: Local Plan Development Timetable**

<b>Key Milestone</b>	<b>Anticipated Programme Date</b>
Early Engagement Consultation	July – September 2019
Submission Consultation	January – February 2020
Submission	March 2020
Examination (estimated)	July – September 2020
Adoption	December 2020

- 3.10 The major objectives for the Local Plan will be determined using the evidence base and consultation feedback. The early engagement consultation and preparation of draft policies and options for the Local Plan will identify objectives for the planning and delivery of development in Crawley. These objectives will be considered during the Sustainability Appraisal. Figure 3.2 shows how the SA and HRA timetables will align with the Local Plan production.

**Figure 3.2: SA and HRA production with the Local Plan**



## **4.0 Crawley and the Sustainability Appraisal Topic Areas**

### **Introduction to Crawley**

- 4.1 Crawley borough covers 4,497 hectares of land in the north east of West Sussex county and is predominately urban in character, although the town is surrounded by countryside lying mostly in neighbouring authorities. Horsham district abuts the town to the west, Mid Sussex district to the south and east, whilst the county of Surrey is adjacent to the north of the town.
- 4.2 Crawley has its origins in the Middle Ages, or even earlier, although the majority of the town's urban form is derived from growth occurring post 1947 when it was designated as one of the 8 post War 'New Towns'. New Towns aimed to stem the increasing congestion and outward sprawl of London whilst providing a better quality of life for Londoners living in the inner and overcrowded areas of the city, by giving new residents access to employment, good quality housing and a green environment.
- 4.3 As a result of the planned approach to development, the town has extensive tree cover and semi-natural open spaces within the urban area. These features provide Crawley with a high quality natural environment and a sense of local distinctiveness, as well as a rich ecological infrastructure network throughout the town.
- 4.4 Fundamental to the urban form of the town is the principle of a town centre offering leisure and shopping opportunities, surrounded by a series of residential neighbourhoods, each with its own facilities and laid out preserving the best natural features of the countryside upon which the neighbourhoods were built. There are 13 neighbourhoods in the town, and development is currently underway on two more: Forge Wood, within Crawley's administrative boundaries, to the north of Pound Hill neighbourhood, and Kilnwood Vale, in Horsham District, immediately adjacent to the west of Bewbush neighbourhood. Significantly, the level of residential development within Crawley town centre has recently been increasing at a fast pace. This is anticipated to result in a population living within the town centre equivalent to a further neighbourhood<sup>4</sup>.
- 4.5 As established in paragraph 2.15 and shown in Figure 2.1, there are a number of other existing developments coming forward immediately adjacent to the borough's administrative boundary: including 750 new dwellings in and around Pease Pottage; 500 new dwellings to the west of Copthorne; and almost 200 new dwellings along Rusper Road close to Ifield. A strategic employment site has also been allocated as part of the proposed Reigate and Banstead Development Management Plan at Horley immediately adjacent to the borough boundary to the north of Gatwick Airport.

### **Sustainability Appraisal Topic Areas**

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

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<sup>4</sup> There were 219 residential units in 2014; and there are now 800 residential units currently in 2019; a further 2,200 units are currently anticipated in the Housing Trajectory (through permissions, prior approvals and allocations) – increasing the total residential units in the town centre over the Plan period to potentially 3,000 dwellings.

- 4.7 The baseline data draws upon the evidence base being gathered for the development of the Local Plan; and existing information and statistics available from monitoring data. At this relatively early stage in the preparation of the Local Plan, elements of the baseline data are still being collected, specifically in relation to data at the ward and neighbourhood level. New information will be added as it is identified to allow the spatial objectives of the Local Plan to be regularly assessed and prioritised.
- 4.8 Statistics and trends are quoted from information available at the time of writing. Crawley reviewed its monitoring arrangements for both the Local Plan and the Sustainability Appraisal as part of the existing Local Plan's preparation and adoption<sup>5</sup>. Since its adoption, the Local Plan has been regularly monitored against the policy and SA indicators. The outcomes of this monitoring has been published in the Authority's Monitoring Reports<sup>6</sup>.
- 4.9 The SEA Regulations and government guidance require that the policies, plans, programmes and objectives that influence the production of the Local Plan should be identified in the SA. The lists presented under each of the topic areas A to G is unlikely to be completely comprehensive because a number of the higher-level plans, policies and programmes are interpreted into lower level local documents. Where conflicts between plans, policies and programmes exist, the council will aim to identify them during Sustainability Appraisal and discuss the approach to resolving the conflict.
- 4.10 The SA topic areas are listed in Table 4.1, with the SEA Directives clearly highlighted where relevant:

**Table 4.1: Consideration of issues in the SEA Directive by Topic Area**

<b>Topic Area</b>		<b>Scope of Topic</b>	<b>Links to SEA Directive</b>
<b>A</b>	<b>Climate Change, Sustainability, Sustainable Design and Construction</b>	energy efficiency, flooding, air quality, noise, water, waste, climate change and water supply	<i>Material Assets, Water; Air; Climatic Factors</i>
<b>B</b>	<b>Heritage, Character, Design and Architecture</b>	urban design, urban environment, cultural heritage.	<i>Cultural Heritage</i>
<b>C</b>	<b>Housing</b>	housing need, aspirations, strategic development locations	
<b>D</b>	<b>Economy</b>	maximising benefits of Gatwick Diamond, vibrant town centres, strong economic growth	
<b>E</b>	<b>Natural Environment</b>	countryside, landscape, trees, biodiversity, greenways and green open space	<i>Biodiversity, Landscape, Air Quality, Fauna, Flora and Soil</i>
<b>F</b>	<b>Transport and Infrastructure</b>	roads, rail, public transport, walking, cycling, Gatwick, infrastructure	

<sup>5</sup> [LP141 Monitoring and Implementation Framework for the Crawley Local Plan 2015-30 \(2015\)](#)

<sup>6</sup> [Crawley Borough Local Plan Authority's Monitoring Report 2017/18](#)

[Crawley Borough Local Plan Authority's Monitoring Report 2016/17](#)

[Crawley Borough Local Plan Authority's Monitoring Report 2015/16](#)

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

### Current Sustainability Issues

4.10 From the examination of the baseline data and the plans, programmes and policies that will influence the Local Plan, it was possible to identify the current sustainability issues faced by the borough. These issues are set out in Table 4.2.

**Table 4.2: Sustainability Issues**

<b>Crawley's Sustainability Issues:</b>	
1. To mitigate climate change, by taking actions to reduce the concentration of greenhouse gases in the atmosphere.	
Climate Change	Crawley as a dense urban area has a high level of carbon emissions and anticipated development, which will contribute towards the causes of climate change.  In addition, it is also identified as an area of radiant energy and subject to serious water stress. Therefore, its adaptation towards climate change will provide opportunities to harness and threats to be addressed.
Energy Supply	Reliance on fossil fuels and high carbon energy supply. Uptake of Renewables.
Waste	Crawley falls within the West Sussex strategy for managing waste. Crawley should seek to promote sustainable waste management. Crawley Borough Council are responsible for household waste and recycling collection. Commercial waste is collected by the private sector and disposal facilities come under WSCC.  The majority of Crawley's household waste goes to the Mechanical Biological Treatment (MBT) facility at Brookhurst Wood. Only a very small amount, mainly dog faeces continues to go to landfill and this is the one located at Redhill, as the former Brookhurst Wood landfill is now closed.  Reducing overall waste production and increasing the amount recycled, reused or composted will remain a key issue and this will be even more prevalent with the increase in the borough's population in the future. This is likely to put pressure on existing waste management services.
2. To adapt to the effects of climate change by reducing the negative consequences of changes in the climate on people and the environment, or by achieving a positive outcome from the effects of climate change.	
Flooding	The concentration of new development in Crawley and the surrounding area could increase the risk of flooding.
Water Supply	The potential for development to be concentrated in the Crawley area may lead to water supply issues.
3. To protect and enhance the valued built environment and character within the borough through high quality new design and the protection of culturally valuable areas and buildings.	
Quality of Life	There is a need to ensure Crawley remains a place where people want to live in order to enhance quality of life.
Land Supply	The borough is characterised as a town within a countryside setting. The borough's administrative boundaries run close to the Built-Up Area Boundary in most cases, with Gatwick Airport located within the borough's boundaries to the north. Due to these factors, land supply in the borough is severely

Crawley's Sustainability Issues:	
	limited, meaning the borough's abilities to meet its own needs (economic and housing development and other open space and recreation land requirements) is limited.
Heritage	Churches, High Street, old village cores.
4. To ensure that everyone has the opportunity to live in a decent and affordable home.	
Housing Delivery	Local housing delivery is sensitive to the national economic climate.
Housing Stock	<p>The housing stock does not match the need and aspirations of the borough in terms of house type and sizes.</p> <p>The age of much of the existing housing stock means it is unable to meet needs of the borough to manage climate change emissions. The fabric of buildings requires retrofitting in order to secure energy efficiency benefits.</p>
Affordable Housing	Affordable housing provision does not match the level of need.
5. To maintain, support and promote a diverse employment base that can serve the local and sub-regional and regional economy.	
Investment Attractiveness	There is a need to ensure Crawley remains a place where businesses and people want to invest, in order to encourage economic growth.
Economic Building Stock	There is a mismatch between the quality of the existing building stock and the current needs of the changing economy, both within the dedicated business areas and within the town centre. The constrained land supply means there is insufficient land available to meet the development needs of the business and industrial uses. A lack of a business hub in Manor Royal leaves a gap in the needs of the businesses located in this area.
Social Mobility and Skills Gap	<p>Local skills do not match the requirements of the higher skilled, higher paid positions within the employment opportunities in the borough, with low GVA and skills. Only 11% of working age residents in Crawley work in managerial or professional occupations.</p> <p>Crawley experiences significant levels of in-commuting to the borough from surrounding areas – on average people who travel into Crawley for work earn more than local people. Around 25% of the working residents have no qualifications. Those leaving education are not able to participate fully in the local economy.</p>
Changing Economy	The economic structure of the town is moving from one dominated by large scale airport relating business to one where professional services are becoming increasingly strong.
Retail Competitiveness	<p>The retail sector of the town's economy has been declining in recent years, and there is nationally an increase in e-retailing.</p> <p>Improvements to the quality and diversity of the town centre has already been taking place in response to this.</p>
Growth of Gatwick Airport	Passenger numbers at Gatwick Airport are increasing which has a positive impact on the local economy, supporting jobs on the airport and also indirectly in the local area, and encouraging businesses to locate and invest in the local area. However, many on-airport jobs are relatively low-skilled and in-commuting is increasing as residents don't have the skills to match the higher skilled opportunities.
Town Centre Neighbourhood	Challenges for town centre retail, and the shift to a town centre neighbourhood with an increasing residential population. Potential conflicts with creating a vibrant night-time and evening economy. Types of dwellings and housing mix within the town centre pose challenges to ensure balanced community. However, this also increases needs for families living within the town centre.

<b>Crawley's Sustainability Issues:</b>	
6. To conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough.	
Green Infrastructure	The lack of development land is increasing the threat to nature areas, open spaces and green infrastructure within the urban environment. Connectivity of green corridors can be limited due to the urban nature and built form of the borough.
Biodiversity	Development in the borough will impact on biodiversity, fauna, flora and soil. In order to address the historic overall loss of biodiversity within the borough, opportunities should be taken for ensuring 'Net Gain' and delivery of the Pollination agenda.
7. To reduce car journeys and promote sustainable and alternative methods of transport, whilst ensuring sufficient transport infrastructure is delivered to meet the requirements of the borough.	
Transport Demand	The growth of the town will increase pressures on transport infrastructure that is already approaching capacity. Parking Provision. Active Travel/Modal-Shift/Public Transport?
8. To ensure the provision of sufficient infrastructure to meet the requirements of the borough.	
Infrastructure provision	The rate of development, particularly residential and also airport growth, requires careful management to ensure that it does not outstrip the borough's infrastructure.
Sewerage	The potential for development to be concentrated in Crawley may lead to sewerage capacity problems.
Community Facilities	The changing population demographics are creating a mismatch between the need for housing and community facilities and current provision. Over-demand on leisure facilities means these are nearing capacity.
9. To promote healthy, active, cohesive and socially sustainable communities. To ensure all benefit from a good quality of life. To ensure everyone has the opportunity to participate in sport and to encourage active lifestyles.	
Ethnic Diversity	The population of Crawley is notably diverse in comparison to the national average resulting in specific development demands.
Young Population	Crawley has a high proportion of young children compared with other West Sussex local authorities. Early years' provision? Social mobility report...
Aging Population	Due to the New Town history – Crawley has an increasingly aging population which is increasing pressures on services and the built environment at the same time.
Street Community and Homeless	There is a small but significant population who are spending nights on the streets, primarily within Crawley town centre.
Arts & Culture	Low participation rates. Low levels of cultural economic opportunities or businesses.
Crime	There is a need to reduce crime and the perception of crime.
Health	Physical activity in the borough is below average: LFFP data?
Health Care	Provision of health facilities and services is at or over capacity in most parts of the borough, e.g. GP provision.
Pollution	Crawley's role as an economic hub and transport interchange means the town's contribution to air, land, water and noise pollution is likely to increase.

<b>Crawley's Sustainability Issues:</b>	
Air Quality	In the context of an expanding town and 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 could be influenced by the future level of growth of Gatwick Airport.
Open Space, Sport and Recreation	Increasing demand on parks, sports facilities and open spaces means these are nearing capacity. The lack of development land is increasing the threat to open spaces and sport and recreation facilities within the urban environment.

### **Consultation Question:**

Are there any other issues you feel we should consider when developing the long term plan for development in the borough?

### **The Sustainability Objectives and Indicators**

4.11 Taking the sustainability issues as a starting point, it was possible to identify the proposed Sustainability Objectives for Crawley. The Objectives will be used to assess how the various policy options being explored for the Local Plan could contribute to the sustainable development of the borough – by comparing each policy or proposal's effects on each objective. The proposed Objectives and the current indicators, which are included in the existing Monitoring Framework for the Local Plan to monitor the effects of the Plan against the Objectives, are shown Table 4.3.

**Table 4.3: Sustainability Objectives and Monitoring Indicators**

<b>Objectives</b>	<b>Examples of Indicators</b>
1. To mitigate climate change, by taking actions to reduce the concentration of greenhouse gases in the atmosphere.	<ul style="list-style-type: none"> <li>• Total energy consumption by council vehicles and buildings, measured in kilowatt hours;</li> <li>• Per capita CO<sub>2</sub> and total emissions in the local authority area, including the breakdown for buildings, industry and transport;</li> <li>• Proportion of new dwelling energy performance certificates at band C and above;</li> <li>• Proportion of all dwelling energy performance certificates at band C and above;</li> <li>• Proportion of Residual household waste collected per capita;</li> <li>• Proportion of household waste recycled or composted.</li> <li>• Electricity generation from renewable sources in the borough as a proportion of electricity consumption within the borough.</li> </ul>
2. To adapt to the effects of climate change by reducing the negative consequences of changes in the climate on people and the environment, or by achieving a positive outcome from the effects of climate change.	<ul style="list-style-type: none"> <li>• Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds.</li> <li>• Proportion of new dwellings with single aspect windows facing within 45 degrees of east, west and south.</li> </ul>
3. To protect and enhance the valued built environment and character within the borough through high quality new design and the protection	<ul style="list-style-type: none"> <li>• Number of Listed Buildings on the Buildings at Risk Register;</li> </ul>

Objectives	Examples of Indicators
of culturally valuable areas and buildings.	<ul style="list-style-type: none"> <li>The percentage of Conservation Areas with up-to-date Appraisals (i.e. last 5 years).</li> </ul>
4. To ensure that everyone has the opportunity to live in a decent and affordable home.	<ul style="list-style-type: none"> <li>Net additional dwellings – in previous years;</li> <li>Net additional pitches (Gypsy and Traveller);</li> <li>Supply of ready to develop housing sites (5-year housing land supply);</li> <li>Rate of statutory homelessness.</li> <li>Median workplace-based affordability ratio.</li> <li>Five-yearly change in the 'Barriers to Housing and Services' domain of deprivation.</li> <li>Number of individuals on the council's Housing List.</li> </ul>
5. To maintain, support and promote a diverse employment base that can serve the local and sub-regional and regional economy.	<ul style="list-style-type: none"> <li>Percentage of people aged 16 – 74 with no qualifications.</li> <li>Working age population qualified to at least Level 4 or Higher.</li> <li>The percentage of those going to university who return to Crawley after graduation.</li> </ul>
6. To conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough.	<ul style="list-style-type: none"> <li>Amount and type of development within areas designated for their nature importance;</li> <li>Amount of trees with Tree Preservation Orders lost per annum.</li> <li>Town Tree Survey?</li> </ul>
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.	<ul style="list-style-type: none"> <li>Number of passengers and staff using Gatwick Airport per annum and percentage arriving by public transport;</li> <li>Per capita and CO<sub>2</sub> emissions from transport (also see Objective 1);</li> <li>Change in number of publicly available Electric Vehicle Charging Points within the borough;</li> <li>Percentage of adult population walking and cycling at least once a week;</li> <li>Ten-year change in percentage of households with access to a car.</li> </ul>
8. To ensure the provision of sufficient infrastructure to meet the requirements of the borough.	<ul style="list-style-type: none"> <li>Rate of residential and commercial development to be in accordance with Local Plan annualised requirements and local commercial requirements;</li> <li>Provision of identified priority infrastructure schemes (monitored through the Community Infrastructure Levy and Infrastructure Plan).</li> </ul>
9. To promote healthy, active, cohesive and socially sustainable communities. To ensure all benefit from a good quality of life. To ensure everyone has the opportunity to participate in sport and to encourage active lifestyles.	<ul style="list-style-type: none"> <li>Self-reported measure of people's overall health and wellbeing;</li> <li>GP/CCG/WSCC Public Health data;</li> <li>Rate of violence offences;</li> <li>Rate of excess winter deaths.</li> <li>Proportion of physically active adults age 19 and above.</li> </ul>

### Consultation Questions:

Do the proposed Sustainability Objectives cover all the issues that are important to consider when developing land or buildings in Crawley?

Please make any suggestions for information you consider to be useful for the council to monitor for assessing whether development is taking place in a sustainable manner.

## **5.0 NEXT STEPS**

- 5.1 This document will be used to inform the preparation of a Sustainability Report including Appraisal of the development options and policies proposed for the new Local Plan. The Draft Report will be published for consultation alongside the Proposed Submission Plan.
- 5.2 The baseline data of the Sustainability Report will need to be revised to incorporate any additional information that becomes available during the preparation of the Local Plan. Collection of data at the ward or neighbourhood level will assist in the appropriate application of the SA objectives when dealing with site-specific policies, and further evidence based studies (for example for transport impacts of development proposals) will be prepared.
- 5.3 A review of the data that will be collected and monitored by the council and other bodies to measure the success of the LDF against the SA objectives will be part of this work. The Proposed Submission Local Plan and Draft Sustainability Report will include proposed a proposed monitoring framework for the future.

### **Proposed SA Report Structure**

- 5.4 Once the Objectives have been finalised and monitoring framework prepared, they will be used as the framework for all future SAs and as the basis for monitoring. The proposed structure of the SA Report is set out below, although the final documents may take a slightly different format dependent upon the outcome of consultation.
  - Non-technical summary
  - Chapter 1 Introduction – Setting out the plan objectives, the relationship with higher level guidance, and the methodology applied to the appraisal;
  - Chapter 2 Sustainability Appraisal Topic Areas;
  - Chapter 3 Plan Policies – Establishing the preferred options;
  - Chapter 4 Sustainability Appraisal of Options and Preferred Option;
  - Chapter 5 Implementation – Setting out the proposed methodology for implementing the findings of the SA, any mitigation required and the proposed monitoring framework to be used to assess the sustainability of the policies and plans as they are implemented.

### **Consultation Arrangements**

- 5.5 This SA/SEA scoping report has been produced in tandem with the development of Issues and Ideas consultation as part of the preparation of a new Local Plan for Crawley. Details of how to make comments are outlined in Section 1.

## **GLOSSARY**

### **Affordable Housing**

Housing delivered through a mixture of public and private subsidies to allow a lower market price or rent price than is normal on the open market.

### **Authority's Monitoring Report (AMR)**

A document produced annually by the council to review the progress made against milestones set out within the Local Development Scheme and the performance of planning policies against national and local indicators. The monitoring period runs from the 1<sup>st</sup> April to the 31<sup>st</sup> March each year.

### **Area of Outstanding Natural Beauty (AONB)**

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

### **Built-up Area Boundaries**

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

### **Community Infrastructure Levy**

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

### **Greenfield Land**

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

### **Local Development Framework (LDF)**

The portfolio of documents designed to deliver the spatial planning strategy for an area. An LDF will typically comprise of the Local Plan, Supplementary Planning Documents, the Statement of Community Involvement, a Local Development Scheme and the latest Authority's Monitoring Report.

### **Local Development Scheme (LDS)**

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

### **Local Plan**

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

### **National Planning Policy Framework**

National planning policy is provided in a single National Planning Policy Framework (NPPF). This was originally published in 2012, and was revised in 2018, with the most recent version published in February 2019.

### **Planning and Compulsory Purchase Act 2004 (updated in 2008)**

Parliamentary Act setting out the broad requirements on Local Authorities for the development of planning policy.

**Planning Practice Guidance**

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

**Previously Developed Land (PDL)**

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

**Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA)**

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

**Statement of Community Involvement (SCI)**

This is a document that explains how the Council intends to involve the local community and key stakeholders in the preparation of Local Development Documents (and in the planning application process) and the steps that authorities will take to facilitate this involvement.

**Sustainable Design**

Design which reduces the impact of the building upon the environment through a number of measures ranging from being located near to public transport, to being able to develop on site power and water sources.

## **APPENDIX A: CONSULTATION QUESTIONS**

We welcome any comments on the Sustainability Appraisal Scoping Report. Specific questions for consultation are listed below for convenience.

**Having read the HRA screening report, do you feel that Appropriate Assessment of the impact of the implementation of the Local Plan is required?**

**Will our proposed methodology appraise the social, environmental and economic impacts of development proposals in line with the requirements for SA?**

**Are there any other groups with an interest in development in Crawley who we should involve in the process? (See Appendix B for a list of proposed list of consultation partners)**

**Are there any other issues you feel we should consider when developing the long term plan for development in the borough?**

**Do the proposed Sustainability Objectives cover all the issues that are important to consider when developing land or buildings in Crawley?**

**Please make any suggestions for information you consider to be useful for the council to monitor for assessing whether development is taking place in a sustainable manner.**

## **APPENDIX B: ENGAGEMENT PARTNERS**

We will consult with all relevant stakeholders during the preparation of the Local Plan and Sustainability Appraisal. We intend to carry out SA through engagement with specific statutory and locally significant partners, with view on aspects of the environmental, social or economic development of Crawley, and its impact on the surrounding areas. The list below indicates those partners we intend to approach directly to assist with the Sustainability Appraisal of the Local Plan.

### **Crawley Borough Council partners:**

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

### **Statutory consultees:**

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

### **West Sussex County Council:**

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

### **Minority Forums:**

Older People  
Ethnic Minorities  
Disabled People  
Young Mothers  
Youth Council

### **Neighbourhood Forums**

### **Schools**

### **Cycle Forum**

### **The Town Access Group**

### **Local Nature Partnership**

### **Homes England**

## **Appendix C: Topic Area Baseline Information, Trends, Plans, Policies and Programmes**

**Topic Area A – Climate Change, Sustainability, Sustainable Design and Construction**  
Including: energy efficiency; flooding; air quality; noise; water; waste; climate change; and water supply.

*SEA Directive – Climatic Change, Material Assets, Water*

### **Introduction**

- A1 Climate change is an issue that has recently come to the fore as awareness has grown of its potential effects. Whilst reducing the release of gases that are contributing to climate change is an important aspect of this issue, there are a number of other sustainability issues that the Local Plan will have to consider. For example, parts of the town are already at risk from flooding and, as further development within the borough may lead to increased run-off, there could potentially be an increased in flood risk if it is not managed appropriately.
- A2 Similarly, the issue of waste is also important, since the pressure on local landfill sites is increasing as capacity for household and commercial waste dwindles. Material assets are another issue as significant developments are proposed within the town, usually requiring materials sourced from beyond Crawley's boundary. Set out below are the key sustainability issues for the town.

### **Relevant Plans, Policies and Programmes**

- A3 For the purposes of this draft SA report, only the key plans relating to this SA Topic Area are introduced. The list provided is not meant to be exhaustive but to indicate the plans with the most relevance. The relevant plans for this Topic Area are:

#### **General**

- National Planning Policy Framework (MHCLG, 2019)
- National Planning Practice Guidance (MHCLG, Updated Regularly)
- A Green Future: Our 25 Year Plan to Improve the Environment (DEFRA, 2018)
- Gatwick Diamond Local Strategic Statement (Chilmark Consulting, 2017)
- Corporate Priorities 2018-2022 (CBC, 2018)
- Carbon & Waste Reduction Strategy (CBC, 2010)
- West Sussex Plan 2017-2022 (2017)

#### **Climate Change**

- Energy Performance of Building Directive (2018/844/EU)
- Climate Change Act (2008)
- Planning and Energy Act (2008)
- National Planning Policy Framework (MHCLG, 2019)
- Clean Growth Strategy (BEIS, 2017)
- BREEAM and the Code for Sustainable Homes (CfSH)
- Building Regulations Part L
- Crawley Carbon and Waste Reduction Strategy (CBC, 2012)
- Decentralised Energy Study for Crawley (Hurley Palmer Flatt, 2011)

#### **Water**

- Consultation on the Transposition of Article 6 of the Groundwater Directive (DEFRA, 2008)
- National Planning Practice Guidance (MHCLG, 2015)
- EU Water Framework Directive (2000/60/EC)
- Crawley Borough Council Strategic Flood Risk Assessment (SFRA) (CBC, 2014)
- West Sussex Lead Local Flood Authority (LLFA) Policy for the Management of Surface Water
- Thames River Basin District River Basin Management Plan (Defra, 2018)
- South East River Basin District River Basin Management Plan (Defra, 2018)
- Gatwick Sub-Region Water Cycle Study (Outline Study) (Entec Ltd, 2011)

- Water Cycle Study Update and Review of Policy Implications (AMEC, 2013)
- London Gatwick Airport Water Quality Management Action Plan 2009-2011
- Thames River Basin Management Plan
- Thames Water Draft Water Resources Management Plan 2019 (Thames Water, 2019)
- Southern Water, Water Resources Management Plan 2015-2040 (Southern Water, 2015)

### **Noise**

- The Environmental Noise Directive (2002/49/EC)
- Environmental Noise (England) Regulations (as amended)
- National Planning Policy Framework (MHCLG, 2019)
- Planning Practice Guidance: Noise (MHCLG, 2014)
- BS4142
- BS8233
- ProPG: Planning and Noise – New Residential Development (May 2017)
- Noise Action Plan: Agglomerations (DEFRA, 2014)
- Noise Policy Statement for England (DEFRA, 2010)
- Airports Commission Discussion Paper 5: Aviation and Noise (Airports Commission, 2013)
- Planning Noise Advice Document: Sussex (East and West Sussex Authorities, 2013)
- Gatwick Airport Noise Management Action Plan 2015-2018 (Gatwick Airport Limited, 2015)

### **Air Quality**

- The Industrial Emissions Directive (2010/75/EU)
- National Emissions Ceiling (NEC) Directive (2016/2284/EU)
- National Planning Policy Framework (MHCLG, 2019)
- Planning Practice Guidance: Air Quality (MHCLG, 2014)
- Clean Air Strategy 2019 (DEFRA, 2019)
- The Air Quality Strategy for England, Wales, Scotland and Northern Ireland (DEFRA, 2007)
- Breathing Better: a partnership approach to improving air quality in West Sussex (2018)
- Air Quality and Emissions Mitigation Guidance for Sussex (Sussex Air Quality Partnership, 2019)
- Crawley Borough Council Annual Status Report on Air Quality (2018)

### **Waste and Minerals**

- National Planning Policy Framework (MHCLG, 2019)
- Minerals: Guidance on the planning for mineral extraction in plan making and the application process (MHCLG, Updated Regularly)
- Waste: Provides further information in support of the implementation of waste planning policy (MHCLG, Updated Regularly)
- Waste Local Plan (West Sussex County Council, 2014)
- West Sussex Joint Minerals Local Plan (West Sussex County Council & South Downs National Park Authority, 2018)
- Government Review of Waste Policy in England (Defra 2011)

**Issue: Crawley's role as an economic hub and transport interchange means the town's contribution to air pollution and climate change is likely to rise**

A4 The estimated total carbon emissions for the borough of Crawley during 2011 were 738 Kilo-tonnes CO<sub>2</sub><sup>7</sup>. Domestic contribution was 178 Kilo-tonnes CO<sub>2</sub> and industry 331 Kilo-tonnes (BEIS, UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2016). By 2016, the total carbon emissions had fallen to 599 Kilo-

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<sup>7</sup> These figures do not include emissions from aviation, which is not counted in local statistics.

tonnes CO<sub>2</sub>, with the 178 Kilo-tonnes CO<sub>2</sub> for domestic use falling to 144 Kilo-tonnes CO<sub>2</sub> and industry use falling to 227 Kilo-tonnes CO<sub>2</sub>.

- A5 Carbon emissions from transport (not including aviation) in Crawley remained broadly steady within the 220-240 kilo-tonne range over the period 2011-16, as emissions from other sources declined. This meant that transport emissions increased as a proportion of Crawley's total from 32 to 39 per cent over the same period. Transport is a topic investigated further in Topic Area F.
- A6 Crawley has a higher-than-average proportion of Carbon emissions from commercial and industrial activities. This is due to the presence of activities and industries supporting the international airport. Despite this, the town's compact structure, low per capita emissions within the domestic sector, and the high proportion of people who both live and work in the borough, mean the overall per capita carbon emissions are still comparable with more rural districts within the county and wider region.

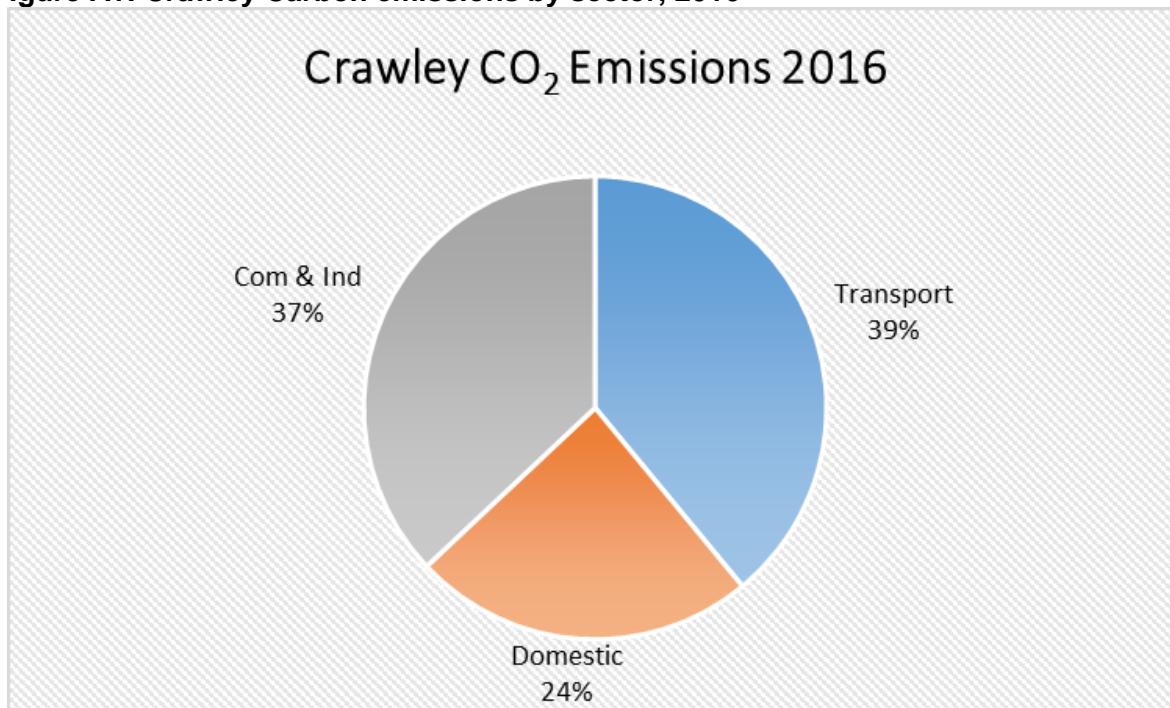
**Table A1: Per capita CO<sub>2</sub> emissions for West Sussex by sector for 2016**

Local Authority	Industry and commercial (kilo-tonnes)	Domestic (kilo-tonnes)	Road Transport (kilo-tonnes)	Total (kilo-tonnes)*	Population '000s (mid-year estimate 2016)	Per capita emissions (tonnes)
Adur	48	91	104	238	63.6	3.7
Arun	139	251	228	588	157.3	3.7
Chichester	267	221	330	680	119.1	5.7
Crawley	227	144	237	599	111.5	5.4
Horsham	207	239	316	685	138.5	4.9
Mid Sussex	175	242	324	665	147.5	4.5
Worthing	102	158	107	364	109.2	3.3
West Sussex	1165	1346	1645	3819	846.9	4.5
<b>Total</b>						
<b>South East Total</b>	<b>12931</b>	<b>14146</b>	<b>20140</b>	<b>45106</b>	<b>9,030.3</b>	<b>5.0</b>

Source: UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2016, BEIS, 2018

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

**Figure A1: Crawley Carbon emissions by sector, 2016**



**Table A2: CO2 emissions trends 2010-2016. Crawley and the South East**

	Total CO2 emissions (tonnes per person)						
	2010	2011	2012	2013	2014	2015	2016
Crawley	7.7	6.9	7.0	6.7	5.3	5.7	5.4
West Sussex	6.2	5.6	5.7	5.5	4.8	4.8	4.5
South East	6.8	6.2	6.3	6.1	5.4	5.3	5.0

Source: UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2016, BEIS, 2018

#### Likely evolution without the continued implementation of the Local Plan

- A7 National legislation and standards for carbon emissions are likely to have an impact on reducing per-capita levels. These are expected to become more ambitious over the next few years in order to pursue the targets required by the 2015 Paris Agreement and the government's target of reaching UK emissions to net zero by 2050. Failure by local authorities to take action using the policy levers available to them is nonetheless likely to increase the risk that these targets will not be met.

#### What the Local Plan can and cannot do

- A8 The Gatwick Diamond Local Strategic Statement seeks to support Crawley as a high profile regional hub and deliver significant numbers of new residential dwellings; objectives not necessarily compatible with reducing the borough's impact on the environment. A strong economy could be a key driver in facilitating the private sector and local residents to make the necessary changes and invest in sustainable design and buildings, particularly if the council encourages energy-efficient measures, decentralised energy and renewable energy.
- A9 While the scale of development anticipated in the Crawley area is likely to make a net contribution to CO<sub>2</sub> emissions, the Local Plan can aspire to reduce this to a minimum, preparing the ground for future advances which can eliminate the net increases associated with new development, and move it into reverse. The Local Plan can aspire to uncouple new development from increases in air pollution at this stage, and potentially reduce it.

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
A1	Total energy consumption by council vehicles and buildings	Energy consumption by council buildings and vehicles has remained broadly steady between 5.0 and 5.3 million kilowatt hours per annum over the period 2012-2017		Since 2012/13, the council has been unsuccessful in achieving a sustained fall in energy consumption, which has remained fairly steady	CBC Environment Team
A2	Per capita CO <sub>2</sub> emissions in the local authority area	2016: Domestic: 1.29 tonnes Total Emissions: 5.4 tonnes per capita	2016 South East: Domestic 1.57 tonnes Total Emissions SE – 5.0 tonnes per capita	While the domestic figures compare favourably with the South East. Total emissions are higher than the regional average due to a high contribution from industrial	UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2016, BEIS, 2018

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
				and commercial activity in the borough. However, Crawley's CO2 emissions have decreased by 19% from 2011	
A3	Proportion of new dwellings with single aspect windows facing within 45 degrees of east, west and south.	In 2017/18 the relevant figure was 81 dwellings out of 372 completed, representing 22% of the total.			CBC Planning Register; Crawley Borough Council Authority Monitoring Report 2017/18

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

- A10 Crawley's water environment has long been an important planning consideration, particularly from a perspective of managing flood risk, and will continue to remain so in planning for Crawley's future. The borough falls entirely within the upper reaches of the River Mole catchment, and the town's close proximity to the catchment has meant that several areas are identified by the Environment Agency as being at risk of flooding. The northward flow of the Upper Mole towards the Thames also has flood implications for Gatwick Airport and neighbouring authorities, in particular Reigate and Banstead. River flooding is not the only source of flooding; Crawley is at the highest risk of surface water flooding in West Sussex. Sewer and groundwater flooding are also important planning considerations.
- A11 Crawley is prone to flooding from the upper reaches of the River Mole and its tributaries, including the Gatwick Stream, Tilgate Stream, Cawtree's Brook and Ifield Brook. Projects are underway to reduce flood risk within the region, most notably the Environment Agency's Upper Mole Flood Alleviation Scheme. Works on the Upper Mole Scheme have been progressed to the stage where four elements, Worth Farm, Tilgate Lake, Grattons Park and Clay's Lake are functioning as designed.
- A12 Planning guidance is provided through the Strategic Flood Risk Assessment (2014). This document provides advice for the areas of the borough that are more susceptible to flood risk, and outlines Development Management recommendations that should be considered in determining planning applications.
- A13 Further detail is provided in the Gatwick Sub-Region Outline Water Cycle Study (2013). This recommends that to reduce surface water flooding, particularly downstream in Reigate and Banstead, Development Plan Documents should include policies that promote sustainable drainage techniques in all developments. As part of any SuDS policy, it is suggested that any redeveloped brownfield sites disconnect their surface water drainage from the foul network.

**Likely evolution without the continued implementation of the Local Plan**

- A14 The council has an existing Local Plan policy relating to flooding is in the process of commissioning an updated Water Cycle Study and Strategic Flood Risk Assessment. Were this policy to be lost, planning applications would still need to conform with national planning guidance and advice from the Environment Agency. However, the Local Plan policy and the SFRA can provide locally specific advice in considering flood risk at the local level and implement locally relevant and cost effective measures.

### **What the Local Plan can and cannot do**

- A15 By providing a framework through which the recommendations of the SFRA and Water Cycle Study can be implemented, the Local Plan can play an active role in reducing flood risk. In consultation with the Environment Agency, the Local Plan can direct development away from areas that are at the greatest risk of flooding and ensure that new development is planned to minimise the risks of runoff and flooding, both to future occupiers and to properties downstream. The NPPF and Planning Practice Guidance advocate a sequential approach that will guide the decision making process (i.e. the allocation of sites). In simple terms, this requires planners to seek to allocate sites for future development within areas of lowest flood risk in the initial instance. Only if it can be demonstrated that there are no suitable sites within these lower risk areas should alternative sites (i.e. within areas that may potentially be at risk of flooding) be contemplated. The council will work in partnership with the local authorities adjoining the authority on this issue.

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
A7	Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds	No planning applications were granted contrary to Environment Agency advice on flooding and water quality grounds in 2017/18 or 2018/19.			Environment Agency Statistics

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

- A16 As mentioned in reference to the geographical scope of the SA, there is the potential for future development to be built in other Local Authority areas adjoining Crawley. There is a risk that potential new strategic development and increased population, combined with the level of economic development, could exacerbate water supply issues and associated water quality and infrastructure capacity issues. Therefore, an updated Water Cycle Study will be commissioned to investigate how best the issue of water stress can be addressed.
- A17 The South East is identified as being subject to significant water stress, the 2013 Water Cycle Study advised that through a twin-track approach of demand management (customer metering, leakage reduction etc.) and resource development (bulk water supply transfer from other areas), there is sufficient water supply could be made available to accommodate the new dwellings within Crawley over the Plan period to 2030. However, there is still a need to push for greater water efficiency, particularly given the scope of identified growth.

### **Likely evolution without the continued implementation of the Local Plan**

- A18 The updated Water Cycle Strategy will assess whether through the water companies 'twin-tack' approach, sufficient water supply can be made available to support planned development of the Local Plan Review at Crawley up to 2035. Water Infrastructure providers are also required to produce Water Supply Management Plans identifying infrastructure capacity and water sources for the future. However, without the implementation of the Local Plan policies, to assist in reducing water stress, it will be challenging for water companies to reliably supply water.

### **What the Local Plan can and cannot do**

- A19 The Local Plan can play a key role in ensuring an efficient and sustainable supply of water over the Plan period by delivering on the advice of an updated Water Cycle Study and new evidence from Water Infrastructure providers to encapsulate its recommendations in the planning policy framework. This approach can lower per capita water consumption in all new homes and commercial premises by encouraging water

efficient new buildings and the retrofit of low-water use facilities in existing building stock.

Indicator No.	Indicator	Crawley Data	Trend	Data Sources
A8	Per capita water consumption	2017/18 Southern Water – 129 l/p/d South East Water – 150 l/p/d SES Water – 160 l/p/d	In the areas covered by Southern Water, South East Water and SES Water, there has been a small reduction in daily water consumption in the last five years.  The Regional Economic Strategy target is 135 litres per day by 2016 and Government aspiration as set out in Future Water (Defra 2008) is for a reduction to 130 litres per person per day by 2030.	Defra Water Conservation Report (2018)

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

- A20 As well as potentially adding to water supply stress, new development at Crawley will invariably take up sewerage network capacity. To establish whether there is sufficient sewage treatment and network capacity to accommodate identified levels of residential and economic growth, an updated Water Cycle Study will be undertaken.
- A21 Following discussion with Thames Water, the 2013 Water Cycle study identifies there will be sufficient capacity at Crawley Wastewater Treatment Works to accommodate planned development up to 2021. The ability of the existing Crawley Sewage Treatment Works site to accommodate further expansion over the period 2020-2035 needs to be confirmed due to the availability of land.
- A22 On this basis, taking account of existing planning permissions and Local Plan housing allocations, the allocated new neighbourhood West of Bewbush (Kilnwood Vale), Crawley Wastewater Treatment Works was considered to be able to accommodate the development of one further new neighbourhood at Crawley up to 2021, now being built as Forge Wood. This position is to be reviewed in an updated study, taking into account growth projected up to 2035.
- A23 The 2013 study concluded that wastewater treatment/sewage capacity did not represent a constraint to development currently planned for the Local Plan during the period 2015- 2030, although it is highly likely that Thames Water will need to upgrade the existing capacity again to meet the demand going forward. In addition, it is recommended that for new developments of 10 or more dwellings, developers should as part of any Water Sustainability and Drainage Assessment demonstrate that the sewerage provider has been contacted to determine if capacity exists offsite for foul and surface water provision. Where capacity off-site is not available, developers should ensure that plans are in place for provision ahead of the development's occupation.
- A24 The 2013 study concluded that there were no environmental constraints (i.e. the capacity of receiving water to receive treated effluent) to development. This will need to be reassessed in the new study and it is acknowledged that the Environment Agency may in the future wish to tighten existing discharge consents if Water Framework Directive (water quality) requirements are to be met.

#### **Likely evolution without the continued implementation of the Local Plan**

- A25 On the completion of upgrades to Crawley Waste Water Treatment Works, sewage capacity was not expected to present a constraint to development at Crawley. However, this was on the basis that the level of housing coming forward at Crawley over the adopted Local Plan period does not exceed Thames Water's identified capacity of 6,150 new homes. If unplanned developments, or additional developments proposed in the Local Plan were to exceed this housing level, it is likely that sewerage capacity would be reached, and further work to ensure sewerage capacity would be

required. Without the Local Plan the likelihood of this threshold being exceeded will be hard to predict, and it would be more difficult for Thames Water to plan for and deliver an adequate service.

### **What the Local Plan can and can't do**

- A26 Through continued dialogue with infrastructure providers, the Local Plan can manage the delivery of housing planned for, and if necessary phase development, to ensure that sufficient sewerage infrastructure is in place.

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

- A27 As part of the Local Air Quality Management process (LAQM) required by the Environment Act 1995, the council carries out an annual review and assessment of air quality in the borough, which helps identify local air quality hot spots, and relate these to pollution sources. Road traffic is the main source of nitrogen dioxide (NO<sub>2</sub>) pollution in Crawley, and our network of monitoring sites records levels along busy roads as well as at background locations and areas of specific interest, in order to give a broad picture of pollution levels across the borough. If the council finds areas where air quality objectives are not being met, it will set out an Air Quality Management Area (AQMA) and produce an action plan (AQAP) showing what steps it will take to improve air quality in that area.
- A28 Air Quality in Crawley is mainly good, with national targets being met for all pollutants, with the exception of nitrogen dioxide (NO<sub>2</sub>) at a small number of locations alongside busy roads and within the AQMA, where the Council is targeting actions to improve air quality.
- A29 A small reduction in nitrogen dioxide levels was seen at all of Crawley's monitoring site during 2017. This pattern was also seen regionally and is often attributed to climatic influences, rather than local conditions. It is therefore more informative to look at the long term trends. The long term monitoring data for Crawley shows that concentrations of nitrogen dioxide have fallen throughout the borough since around 2008, despite significant housing and commercial development over the same period. However levels have remained broadly consistent over the last five or six years.
- A30 In 2017, there were no exceedances of the hourly objective for nitrogen dioxide, but one location close to the busy A2011 dual carriageway in the AQMA exceeded the annual objective for nitrogen dioxide, and a further busy roadside site close to Three Bridges Station, also showed exceedances of the objective levels. (This was a new monitoring site, which will continue to be monitored and reported on next year when there will be sufficient data to draw more reliable conclusions).
- A31 2,000 dwellings being developed at the new Forgewood neighbourhood represent a potential source of vehicle pollution which may cause existing and new areas in Crawley to exceed the objective levels. The Council therefore has no current plans to revoke the existing AQMA, and may even need to expand the current AQMA boundaries or create a new AQMA if objective levels are exceeded in other areas.
- A32 The council intends to build upon the improving air quality picture across the borough by developing its air quality action plan and continuing to work in partnership with colleagues in Planning, Highways and Sussex air quality partnership as well as engaging its staff, the public and local businesses to further improve air quality in the area.

### **Likely evolution without the continued implementation of the Local Plan**

- A33 Although national standards for air quality may improve matters in the short term, it is likely that they will start to decline again in the future as development of both Crawley town and Gatwick Airport come forward, and traffic increases.

### **What the Local Plan can and cannot do**

A34 The Local Plan influences the sustainability of new buildings; has some influence over car ownership in new developments; and the promotion of sustainable travel options, although individuals and businesses are responsible for the environmentally based decisions they make on a day to day basis. Policy ENV12 of the Local Plan will also require that development proposals to positively address air quality issues. It is these lifestyle decisions that will ultimately determine the air quality in the town and surrounding area. The growth of the nationally significant airport is another factor largely outside the Local Plan and the council's control.

**Issue: Noise has the potential to affect people living, working in and visiting Crawley, particularly aircraft noise in the north of the borough. The degree to which this will affect people is affected by uncertainty surrounding the future expansion of Gatwick Airport.**

A35 Through Noise Action Plans, Defra have mapped noise across the country in response to the Environmental Noise Directive. Road and rail noise mapping around Crawley identifies several noisy areas around the M23, A23 and A264. Crawley is identified as one of 65 urban areas in England that are affected by noise and the Plan includes measures to mitigate excessively noisy areas. Crawley borough might be expected to take responsibility for implementing some of these measures.

A36 Gatwick Airport is a significant source of noise pollution in Crawley. Currently, certain areas to the south of the runway are noise affected, which means that residential uses are inappropriate in this location. The possibility of growth at the airport would result in more of the town being affected by aircraft noise, particularly in the north of the borough.

A37 In this context, it is important that new development is appropriately located and designed so that future expansion does not lead to problems for residential properties in the future. The Local Plan 2030 introduced a noise annex which set out locally specific noise standards for Crawley. It is intended that these standards will be updated to take account of new evidence relating to the impacts of noise exposure.

### **Likely evolution without the continued implementation of the Local Plan**

A37 The decisions linked to the development of growth at Gatwick Airport will likely be deemed as nationally Significant Infrastructure, and will be taken by the Secretary of State, outside of Crawley's Local Plan. Without the Local Plan, the council would be less able to locate noise sensitive development (such as residential uses) away from noise sources.

### **What the Local Plan can and cannot do**

A38 The plan can strongly influence the types and location of development within the areas of the town that may be subject to aircraft noise in the future. The production of the Local Plan will ensure that the relationship between noise sensitive use and noise generating use is managed to ensure development does not result in an unacceptable noise impact, in line with other proposals for development and the protection and use of open space in the borough.

Indicator No.	Indicator	Crawley Data SE/England Data	Trend	Data Sources
A10	Number and type of new noise sensitive use built in areas currently and potentially affected by unacceptable noise.	The Secretary of State's decision at the North East Sector permits noise sensitive development up to the 66 dB (A)Leq noise contour.	If a second runway is located at Gatwick, a number of existing properties will fall inside the projected 60 dB (A)Leq noise contour.	CBC Indicator

## **Topic Area B – Heritage, Character, Design and Architecture**

Including urban design, urban environment, cultural heritage

*SEA Directive – Cultural Heritage*

### **Introduction**

- B1 Despite Crawley experiencing significant change and expansion since the New Town designation in 1947, many features of the cultural heritage and design present within the original settlements (Ifield, Crawley, Three Bridges) and the best features of the natural landscape have been preserved and incorporated into the urban fabric of the new town. In addition, parts of the new town (such as the Southgate Neighbourhood Parade) have been recognised as a Conservation Area. These features are often fundamental to the ‘feel’ of the neighbourhoods and the quality of the town’s environment, but are increasingly under development pressure as Crawley continues to expand. The key issues in relation to heritage, design and architecture are discussed below.

## **Topic Area B – Heritage, Character, Design and Architecture**

Including urban design, urban environment, cultural heritage

*SEA Directive – Cultural Heritage*

### **Relevant Plans, Policies and Programmes**

- B2 For the purposes of this SA report, only the key plans relating to this Topic Area are introduced. The list provided is not meant to be exhaustive but to indicate the plans with the most relevance. The relevant plans for this Topic Area are:

- National Planning Policy Framework (MHCLG, 2019)
- Planning Practice Guidance (MHCLG, 2018)
- Heritage Statement: One Year On (DCMS, 2018)
- Culture White Paper (DCMS, 2016)
- Crawley Borough Council Corporate Heritage Strategy (2008)
- Crawley Baseline Character Assessment (2009)
- Budapest Declaration on World Heritage (UNESCO, 2002)
- Planning (Conservation Area and Listed Buildings) Act 1990
- Crawley ASEQ’s and Locally Listed Buildings Heritage Assessment (ABA, April 2010)
- Sussex Historic Landscape Characterisation (HLC) study (2010)
- Historic Parks and Gardens Review (Sussex Gardens Trust, 2013)
- Building for Life – Evaluating Housing Proposal Step by Step (2008)
- Secure by Design
- English Heritage, West and East Sussex EUS
- World Heritage Convention (UNESCO, 1972)
- Housing Space Standards (GLA, 2006)
- Technical Housing Standards – Nationally Described Space Standard (MHCLG, 2016)

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

- B3 Well-designed buildings and spaces, of which the historic environment is often a part, help create attractive, locally distinctive and valued places in which to live and work. Good design should create buildings and spaces that are easy to use, maintain and adapt and which encourage sustainable travel, healthy living, biodiversity and a sense of well-being.
- B4 The visual appearance and heritage interest of the town are of importance because they affect the quality of life of residents and its perception and attractiveness to outside businesses and potential residents and investors. This effect is most obvious in the town centre, where the appearance and function of certain areas needs updating. This issue is possibly made starker due to the rapid nature of the town’s growth during

the 1950s, 60s and 70s, which has meant that many buildings are of an age and style whose attractiveness and historic interest is not always widely appreciated. Consequently, the perception of Crawley to some outsiders (and outside investment) can be negative.

- B5 Despite having grown considerably over a short period of time, Crawley's neighbourhoods have retained distinctive characters. There are 105 Listed Buildings throughout the borough, none of which are believed to be at risk. Ifield has the highest number of listed buildings with 22, including two Grade I properties. The High Street has 13 listed buildings including 4 II\* properties. There are 4 Scheduled Ancient Monuments, 13 Archaeologically Sensitive Sites and 38 other areas of suspected archaeological interest. There are 6 historic parks included within West Sussex County Council's list of sites of archaeological interest.
- B6 There are currently eleven conservation areas in the borough, defined as areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance. These are: The High Street, Ifield Village, Worth, Forestfield & Shrublands (in Furnace Green) Dyers Almshouses (Northgate), Sunnymead Flats and St Peter's (both in West Green), Brighton Road, Malthouse Road and the Southgate Neighbourhood Centre (in Southgate) and Hazelwick Road (Three Bridges).
- B7 There are six designated Areas of Special Local Character (ASLC) in Crawley, which are locally important areas of special environmental quality. Four of these are located in Pound Hill.
- B8 The council has prepared a number of plans, including the adoption of a Corporate Heritage Strategy in June 2008 and more recently the 2009 Crawley Baseline Character Assessment and 2010 ASEQ (now known as an ASLC) review, which provide an assessment of the town and the need and opportunity for revisions and new Conservation Areas and Areas of Special Local Character. The Crawley Extensive Urban Survey (EUS, 2008) forms part of the Sussex (EUS), a survey of Historic Towns in Sussex, as part of a national survey programme to assess smaller historic towns of England county by county. The Sussex EUS delivered a unique and flexible tool to aid the understanding, exploration and management of the historic qualities of 41 of the most significant towns in Sussex and was prepared by a consultant on behalf of West Sussex County Council (with funding from English Heritage).

#### **Likely evolution without the continued implementation of the Local Plan**

- B9 Without the continued implementation of the Local Plan, it will be harder for the council to continue to rejuvenate areas of the town that are struggling. Whilst aspects of the town's heritage are already protected, there are other areas and non-designated assets, particularly within the New Town, that could continue to be negatively affected or even completely lost without the continued implementation of the Local Plan.

#### **What the Local Plan can and cannot do**

- B10 Through Local Plan policies and design guidance, the quality and local distinctiveness of new development and character of the local area can be enhanced. Furthermore, subject to the other policy considerations, the culturally important areas of the town can continue to be protected.

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
B1	Number of listed buildings on the Buildings at Risk Register	No buildings currently on the at risk register.			English Heritage at Risk

<b>Indicator No.</b>	<b>Indicator</b>	<b>Crawley Data</b>	<b>SE/England Data</b>	<b>Trend</b>	<b>Data Sources</b>
<b>B2</b>	Percentage of conservation areas with up-to- date Appraisals (i.e. last 5 years).	Five out of Crawley's eleven Conservation Areas (45%) have up to date statements as of July 2019	N/A	These Appraisals are being reviewed with the Conservation Area Advisory Committees.	Local Performance Indicator

## **Topic Area C – Housing**

Including: housing need, aspirations, and strategic development locations.

### **Introduction**

C1 Set out below are the issues and problems associated with housing provision and quality in Crawley. Housing is a separate topic area because of the importance of housing to peoples' quality of life, the economy and its contribution to sustainable living.

### **Relevant Plans, Policies and Programmes**

C2 For the purposes of this SA Report, only the key plans relating to this Topic Area are introduced. The list provided is not meant to be exhaustive but to indicate the plans with the most relevance. The relevant plans for this Topic Area are:

- National Planning Policy Framework (MHCLG, 2019)
- The Town and Country Planning (Permission in Principle) Order 2017
- Housing and Planning Act 2016
- Self-build and Custom Housebuilding Act 2015
- Planning Practice Guidance (MHCLG, 2015, 2016, 2017, 2018, 2019)
- White Paper: Fixing our broken housing market (MHCLG, 2017)
- Clean Growth Strategy (BEIS, 2017)
- Gatwick Diamond Local Strategic Statement (Chilmark Consulting, 2017)
- Housing Act (2004)
- Planning Policy for Traveller Sites (MHCLG, 2015)
- CBC Corporate Priorities 2018 – 2022 (2018)
- Northern West Sussex Strategic Housing Market Assessment and update (GVA, 2009 and 2012)
- Northern West Sussex Housing Market Area 'Affordable Housing Needs Model Update' (Chilmark Consulting, 2014)
- Objective Assessment of Crawley's Housing and Employment Needs (Chilmark Consulting, 2015)
- Homelessness Strategy 2014-2019 (CBC, 2014)
- The Strategic Housing Land Availability Assessment (CBC, 2019)
- At Crawley Study (GL Hearn, 2009)
- Gypsy and Traveller Accommodation Needs Assessment (GTAA) (CBC, 2014)
- Housing Trajectory (CBC, 2019)
- West Sussex SHOP@ Summary Report (WSCC, 2014)
- Independent living in your retirement: Housing Opportunities (CBC, 2010)

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

C3 Housing delivery in the period 2015 to 2018 exceeded the annual average requirement detailed in the 2015 Local Plan. However, this followed a period of weak delivery from 2011 to 2015 owing to the slow recovery of the development industry following post 2008 economic downturn. At present economic uncertainty associated with the departure of the UK from the European Union is also weighing on development activity. These fluctuations have been reflected in delays in the build out of allocated and permissioned sites, and consequently depressed housing delivery.

### **Likely evolution without the implementation of the Local Plan**

C4 Without the development of the Local Plan and identification of housing sites, the future pattern of development would be more uncertain and the planning risks associated with residential and other types of development would be greater. This unpredictability would increase the economic costs of development, while also increasing the risk that housing sites may come forward in unsustainable locations or in strategic sites prejudicial to the long term aspirations of the council, or for lower density schemes thereby not maximising the capacity of limited land resource.

## What the Local Plan can and cannot do

C5 Whilst planning policy can be made more flexible to ensure that the viability of schemes is maintained, the macroeconomic factors affecting development activity are largely beyond the control of the Local Plan. However, the planning policy viability implications for new housing development within the town will be considered as part of an updated Local Plan Viability Study.

Indicator No.	Indicator	Crawley Data	Trend	Data Sources
C1	Plan period and housing delivery targets	Average annual net delivery of 502 dwellings per annum over 2015-18, & predicted delivery of 342 units net in 2018/19, compared with Local Plan target of 340d.p.a	Fluctuating widely between appx 340 and 600 d.p.a	CBC Authority Monitoring Reports 2015 – 2018
C2	Trajectory comprising: a) Net additional dwellings – in previous years b) Net additional dwellings – for 2018/19 c) Net additional dwellings – in future years Managed delivery target	a) 1506 net delivered over 2015-18 b) predicted 342 (net) in 2018/19 c) 4,688 projected over 2019-30	So far during the Local Plan period current delivery has exceeded the annual average housing target and projected delivery for the entire Local Plan period is exceeding the supply identified at the point of adoption in 2015.	CBC April 2019-base Housing Trajectory  CBC Authority Monitoring Reports 2015-2018
C3	Net additional pitches (Gypsy and Traveller)	Nil	The Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (CBC, 2014) identified a potential future need for up to ten pitches within Crawley.	CBC Authority Monitoring Reports 2015-2018
C4	Gross affordable housing completions	Gross delivery of 404 over period 2015-18, amounting to 27% of total supply and 45% of supply on sites with planning permission	Delivery of affordable housing has accelerated over the period 2015-18, achieving within that period the implied average requirement of 136 d.p.a. (i.e. 40% of 340 d.p.a).	CBC Authority Monitoring Reports 2015-2018

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

- C6 The 2011 Census indicates that the population of Crawley has risen significantly over recent decades, increasing by 30% from 82,000 in 1981 to 106,597 in 2011, and reaching an estimated 112,448 in 2018. In terms of population structure, Crawley's population has a greater proportion of younger people between the ages of 25 and 34 and a lower percentage of elderly people, compared with the rest of the South East. Inward migration to Crawley has also been outstripping out-migration, which is contributing towards continued population growth.
- C7 Looking to the future, population projections indicate continued growth in the order of about 19% between 2018 and 2035, reflecting the relatively young age profile of today's population. Over the next 20 years, births are expected to exceed deaths by a factor of around 2:1. This natural change, combined with trends in people living longer and increasing proportion of people living alone or in smaller households, means that there will be a significant requirement for additional housing in the future.
- C8 Despite an increasing proportion of smaller households, the local housing market will continue to be dominated by families. However, there is increasing demand for housing to meet the needs of the over 65s, such as bungalows and homes that support assisted living for the elderly. At the same time, the bulk of housing in Crawley is predominately smaller homes or flats, between one and three beds and usually terraced. Qualitative evidence suggests that current housing stock does not meet the aspirations of the community, the economy, or families seeking larger properties. Therefore, a priority for the Local Plan will not only be to facilitate the delivery of housing but to ensure the correct types and quality of housing are available in the correct locations to support the needs and aspirations of a changing population.
- C9 The number of households in Crawley increased by 43% from 30,000 in 1981 to 43,000 in 2011. This increase is greater than the growth in population over a similar period. Average household sizes have declined from 2.74 in 1981 to 2.48 in 2011. This is consistent with national trends, which have seen shifts in household composition towards smaller household sizes. The change in the number of households between 1981 and 2009 equated to an average of 482 per annum. The latest household estimates (April 2018) project a figure of 323 per annum for the period 2019 to 2035 based on 2016 population projections.

**Likely evolution without the continued implementation of the Local Plan**

- C10 It is considered that without the development of appropriate planning policies with regard to house size, type, location, affordability and tenure, the disparity between residents housing needs / aspirations and new housing stock will not be addressed.

**What the Local Plan can and cannot do**

- C11 If required, planning policy could specify the required housing mix (i.e. tenure, type, size) for development based upon current need and subject to scheme viability. Policy H4 of the consultation draft review Local Plan (Future Housing Mix) endeavours to provide the appropriate future housing mix for the future generations of residents within Crawley.

Indicator No.	Indicator	Crawley Data	Trend	Data Sources
C5	Mix of affordable housing delivered compared to the indicative affordable housing provision by bedroom size identified in the most recent SHMA (1-bed - 25%,	During 2015-18, out of 404 gross affordable housing units completed the breakdown was: - 1-bed 135 (33%);	The greatest demand trend is for smaller homes, but those waiting for larger family homes currently wait the longest for suitable properties.	CBC Authority Monitoring Reports 2015-18

	2-bed – 50%, 3-bed – 20%, 4-bed – 5%)	- 2-bed 206 (51%); - 3-bed 61 (15%); - 4-bed 2 (0.5%)		
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#### **Issue: Affordable housing provision does not match the level of need**

- C12 Affordable housing delivery, as previously reported, has been strong in recent years. However, the numbers of people believed to be in housing need, which includes affordable and intermediate forms of housing, is continuing to increase. Family groups, requiring large housing are currently waiting the longest due to the types of dwellings currently being built in the town (mostly one and two bed properties). One particular group who require attention are those who can afford to pay more than social rented, but cannot afford open market housing. There is therefore a need to provide intermediate forms of housing provision.

#### **Likely evolution without the continued implementation of the Local Plan**

- C13 The council has existing policies that relate to the provision of affordable housing and therefore, the supply would not necessarily be affected. However, the consultation draft Local Plan Review provides an opportunity to reassess the composition of need, particularly with regard to the role of intermediate tenures, which might be lost. This will be undertaken as part of an updated Strategic Housing Market Assessment which has been commissioned by the council.

#### **What the Local Plan can and cannot do**

- C14 Whilst the council cannot make developers develop sites, it can introduce policies that require the correct tenure, types and mix of housing, in the correct locations, subject to viability.

Indicator No.	Indicator	Crawley Data	Trend	Data Sources
C7	Estimated number of households in housing need (per annum)	197 – 527 affordable dwellings per annum		CBC Strategic Housing Market Assessment Affordable Housing Needs Model Update 2014

#### **Issue: Land supply in the borough is limited**

- C15 As Crawley's administrative boundary is tightly drawn around the Built-Up Area Boundary (BUAB), there is a limited supply of undeveloped and unconstrained land in the borough. Understandably, this has strong implications for meeting housing need and aspirations. Recent developments have tended to be flatbed one and two bed schemes, because of the types of housing sites that are available in the town. The building of family and aspirational homes, whilst meeting the numerical requirements of the borough, will be dependent upon ensuring the efficient use of land. With the ongoing build out of Forge Wood neighbourhood, a significant amount of housing will be able to be provided, but work on housing needs indicates that much more housing will be required to serve the development of the borough.

#### **Likely evolution without the continued implementation of the Local Plan**

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

## What the Local Plan can and cannot do

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

Indicator No.	Indicator	Crawley Data	Trend	Data Sources
<b>C9</b>	Supply of ready to develop housing sites (5-year housing land supply)	5-year housing land supply (1 April 2019 to 31 March 2024) = 3,162	The 5-year housing land supply has tended to be strong in the past few years.	CBC Housing Trajectory – April 2019 Base
<b>C10</b>	New and converted dwellings – on previously developed land (PDL)	2015-2018: 74% of completions	This indicator has fluctuated around a high level, and will increase further as remaining greenfield sites are built out.	CBC Authority Monitoring Reports 2015-18
<b>C11</b>	Average density of new residential development	2017/18 All sites – 43.9 dwellings/ha 10+ units sites – 44.29 dwellings/ha Up to 9 unit sites – 29.59 dwellings/ha		West Sussex Monitoring Data.

## **Topic Area D – Economy**

Including: maximising benefits of Crawley's location at the heart of the Gatwick Diamond, vibrant town and neighbourhood centres, sustainable economic growth, improving access and opportunities to employment.

### **Introduction**

D1 The success of the local economy is an important topic area for the social, economic and environmental wellbeing of the town. A strong economy can help to generate investment, supporting the economic strength of the Gatwick Diamond, creating employment opportunities and helping to raise aspirations locally. In turn, this can help support social, economic and environmental improvements. However, economic benefits do not always spread throughout the local population and addressing the local skills gap and improving social mobility is a key issue for Crawley. Therefore, promoting a strong economy is likely to be one of the key drivers for improving the town.

### **Relevant Plans, Policies and Programmes**

D2 For the purposes of this SA Report, only the key plans relating to this Topic Area are introduced. The list provided is not meant to be exhaustive but to indicate the plans with the most relevance. The relevant plans for this Topic Area are:

#### **Employment and Town Centres**

- National Planning Policy Framework (MHCLG, 2019)
- Planning Practice Guidance (MHCLG, 2014, 2018)
- Gatwick Diamond Futures Plan 2008 – 16
- GHK Diamond Report (October 2008)
- Gatwick Diamond Local Strategic Statement (Chilmark Consulting, 2017)
- Coast to Capital Local Enterprise Partnership Strategic Economic Plan (2014)
- Gatwick 360 (Coast to Capital LEP, 2018)
- Local Development Framework Diamond Report (GVA Grimely)
- Crawley Economic Growth Assessment Update (NLP, 2015)
- Northern West Sussex Economic Growth Assessment (NLP, 2014)
- Employment Land Trajectory 2015 – 2030 (AMR 2018 refers)
- Emerging Economic Growth Assessment 2019 (Lichfields, 2019)
- Retail, Commercial, Leisure and Town Centre Needs Assessment (emerging study, 2019)
- Town Centre SPD (CBC, 2016)
- Manor Royal Design Guide SPD (CBC, 2013)
- Manor Royal Public Realm Strategy (CBC, 2013)
- Manor Royal Economic Impact Study (2018)
- Crawley Growth Programme
- Crawley Town Centre Regeneration Programme (updated March 2018)
- Crawley Employment and Skills Programme 2019-2024
- State of the Nation 2018-19: Social Mobility in Great Britain (Social Mobility Commission)
- Active Lives Survey 2015-17, Arts Council England
- West Sussex Minerals Local Plan (2018)
- HOR9 Strategic Employment Site: Economic Assessment Task 1 Supply and Demand Evidence (Chilmark for Reigate and Banstead Borough Council 2017)
- HOR9 Strategic Employment Site: Economic Assessment Task 2 Economic and Market Impact Analysis (Chilmark for Reigate and Banstead Borough Council 2017)

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

D3 With land supply in Crawley significantly constrained by a tight administrative boundary and the requirement to safeguard land at Gatwick Airport, the 2015 Crawley Borough Local Plan identified an unmet business land requirement of 35 hectares.

The emerging 2019 Economic Growth Assessment is suggesting that over the review Plan period to 2035 there will be need for between 44.6 and 57.6 hectares additional land for business-led economic growth. With a current employment land supply pipeline of 11.75ha, it is possible that there will be an unmet business land need of 32.9 and 45.8 hectares business land over the Plan period.

#### **Likely evolution without the continued implementation of the Local Plan**

D4 Crawley is situated at the heart of the Gatwick Diamond, and through its excellent transport links, clustering of businesses and ambitious growth plans, it continues to be the leading employment destination in the sub-region. There remains a strong demand from businesses seeking to locate in Crawley, as well as demand from existing businesses within the borough that are seeking to grow. An available business land supply would help to accommodate new floorspace, helping to meet the identified need within the Borough. As identified in the Local Plan and its supporting evidence, there is risk that without sufficient land supply on which to locate and grow, some business needs could be displaced to Horsham and Mid Sussex or, indeed, outside the sub-region entirely.

#### **What the Local Plan can and cannot do**

D5 The Local Plan Key Diagram identifies a 523ha Area of Search as the preferred destination for a Strategic Employment Location to accommodate Crawley's unmet business land needs. The council is awaiting a definitive Government decision, through the forthcoming Aviation White Paper, as to whether or not it will be required to retain safeguarding. Should safeguarding be lifted, this will present an opportunity to re-appraise land supply in Crawley Borough. Should safeguarding remain in place, it will be challenging to meet Crawley's identified business land needs inside the borough boundary. The Local Plan therefore seeks to maximise the use of employment land in Crawley, protecting the designated main employment areas employment use, and specifically protecting Manor Royal for business, and business supporting, uses. The Local Plan also seeks to maximise the efficient use of existing employment land, supporting identification of sites, and the identification of small extensions to Manor Royal where appropriate. The allocated Horley Business Park in Reigate & Banstead Borough will also help to meet some of Crawley's unmet business land needs.

Indicator No.	Indicator	Crawley Data	Trend	Data Sources
D1	Comparison of actual and projected gross delivery rates for B-class employment floorspace 2015-2018	<p>Gross B-class delivery (excluding 'churn') as a percentage of projected delivery rate (from EGA)</p> <p><u>2015/16</u></p> <p>Gross delivery exc; churn (sqm) Office: 12,062 Industrial: 8,872 Total: 20,934</p> <p>Projected delivery rate (sqm) Office: 9,281 Industrial: 9,865 Total: 19,146</p> <p>Gross B-class delivery (excluding 'churn') as a percentage of projected delivery rate</p> <p>Office: 130% Industrial: 90%</p>	<p>Recent years have seen Crawley exceed its projected gross B-class floorspace delivery. For the three most recent monitoring years this has included significant office floorspace delivery (49,014sqm) again industrial (26,389%).</p>	<p>Crawley Authority Monitoring Report.</p> <p>WSCC HEDNA data.</p>

Indicator No.	Indicator	Crawley Data	Trend	Data Sources
		<p>Total: 109%</p> <p><u>2016/17</u></p> <p><u>Gross delivery exc; churn (sqm)</u></p> <p><u>Office: 16,646</u></p> <p><u>Industrial: 15,172</u></p> <p><u>Total: 31,818</u></p> <p><u>Projected delivery rate (sqm)</u></p> <p><u>Office: 9,281</u></p> <p><u>Industrial: 9,865</u></p> <p><u>Total: 19,146</u></p> <p><u>Gross B-class delivery (excluding 'churn') as a percentage of projected delivery rate</u></p> <p><u>Office: 179%</u></p> <p><u>Industrial: 154%</u></p> <p><u>Total: 166%</u></p> <p><u>2017/18</u></p> <p>Gross Delivery exc; churn sqm</p> <p>Office: 20,306</p> <p>Industrial: 2,345</p> <p>Total: 22,651</p> <p><u>Projected delivery rate (sqm)</u></p> <p><u>Office: 9,281</u></p> <p><u>Industrial: 9,865</u></p> <p><u>Total: 19,146</u></p> <p>Gross B-class delivery (excluding 'churn') as a percentage of projected delivery rate</p> <p>Office: 219%</p> <p>Industrial: 24%</p> <p>Total: 118%</p>		
D2	Comparison of actual and projected losses of B-class employment floorspace to non-employment uses 2015-2018	<p>Completed losses as a % of projected loss rate</p> <p><u>2015/16</u></p> <p>Completed losses to non B-uses (sqm) Office: 11,706</p> <p>Industrial: 175</p> <p>Total: 11,881</p> <p>Projected loss rate (sqm)</p> <p>Office: 4,803</p> <p>Industrial: 4,092</p> <p>Total: 8,895</p> <p>Completed losses as a % of projected loss rate</p> <p>Office: 244%</p> <p>Industrial: 4%</p> <p>Total: 134%</p>	<p>Significant PDR losses to residential have informed a higher than anticipated % of losses versus projected losses. 2017/18 has seen a reversal of this trend, possibly a result of Article 4 Directions.</p>	<p>Crawley Authority Monitoring Report.</p> <p>WSCC HEDNA data.</p> <p>CBC PDR monitoring.</p>

<b>Indicator No.</b>	<b>Indicator</b>	<b>Crawley Data</b>	<b>Trend</b>	<b>Data Sources</b>
		<p><u>2016/17</u>  Completed losses to non B-uses (sqm) Office: 17,955  Industrial: 3,003  Total: 20,958</p> <p>Projected loss rate (sqm)  Office: 4,803  Industrial: 4,092  Total: 8,895</p> <p>Completed losses as a % of projected loss rate:  Office: 374%  Industrial: 73%  Total: 236%</p> <p><u>2017/18</u>  Completed losses to non B-uses (sqm) Office: 2,353  Industrial: 3,180  Total: 5,715</p> <p>Projected loss rate (sqm)  Office: 4,803  Industrial: 4,092  Total: 8,895</p> <p>Completed losses as a % of projected loss rate:  Office: 53%  Industrial: 78%  Total: 64%</p>		
<b>D3</b>	Comparison of net employment floorspace delivery with 'baseline' scenario projected requirement	<p><u>2015/16</u>  Net delivery (sqm) Office: -4,813  Industrial: 6,879  Total: 2,066</p> <p>Baseline Requirement (sqm)  Office: 4,478  Industrial: 5,773  Total: 10,251</p> <p>Delivery as a % of requirement:  Office: -108%  Industrial: 119%  Total: 20%</p> <p><u>2016/17</u>  Net delivery (sqm) Office: -1,309  Industrial: 10,669  Total: 9,360</p> <p>Baseline Requirement (sqm)</p>	<p>Taking losses into account, net delivery of employment space over the period 2015-18 has reached 79% of the identified baseline requirement, with the office and industrial categories achieving 87% and 72% of their respective requirements.</p>	<p>Crawley Authority Monitoring Report.</p> <p>WSCC HEDNA data.</p> <p>CBC PDR monitoring.</p>

Indicator No.	Indicator	Crawley Data	Trend	Data Sources
		<p>Office: 4,478 Industrial: 5,773 Total: 10,251</p> <p>Delivery as a % of requirement: Office: -23% Industrial: 185% Total: 91%</p> <p><u>2017/18</u> Net delivery (sqm) Office: 17,771 Industrial: -4,998 Total: 12,773</p> <p>Baseline Requirement (sqm) Office: 4,478 Industrial: 5,773 Total: 10,251</p> <p>Delivery as a % of requirement: Office: 398% Industrial: -87% Total: 125%</p>		

**Issue: Existing office stock does not match the current or long-term needs of the changing economy, both within the designated main employment areas**

D6 Qualitative evidence from business organisations and land agents, in addition to information discussed in the emerging EGA 2019, suggests that the original business estates created as part of the New Town and which predominately provided industrial type floorspace do not match the needs of the growing tertiary or 'knowledge' economy in the town. The emerging 2019 EGA identifies office-based employment as a key growth sector over the Plan period to 2035, but finds that the market demand is particularly for Grade A specification office stock, frequently bespoke rather than speculative, and across a range of sizes. The demand is in contrast to the available supply, which is largely composed of less modern Grade B stock. This has resulted in the Crawley office market being somewhat suppressed, with the limited available Grade A stock quickly taken up, and lower grade stock tending to remain vacant or becoming vulnerable to other economic uses. Loss of office floorspace through permitted development has also been an issue, with 61,500 square metres of commercial space lost to residential development through prior approval.

**Likely evolution without the continued implementation of the Local Plan**

D7 An updated Local Plan can help to specifically encourage the delivery of new Grade A office stock in the designated main employment areas, potentially simplifying its delivery through locally removing the national requirement for applicants to provide a sequential assessment. Office make for a more efficient use of floorspace (employees per square metre) and can therefore also contribute positively to the intensification and efficient use of Crawley's limited business land supply. Without a dedicated office policy in the Local Plan, office uses can still be delivered as part of broader range of B-use class typologies that are supported, and as existing, the sequential approach would not apply where offices are proposed in Manor Royal. However, a specific office-focussed policy can more clearly support the delivery of the A Grade specification offices that are needed.

## What the Local Plan can and cannot do

- D8 The EGA discusses how the Local Plan could potentially help maintain and enhance Crawley's established economic function through setting out a clear strategy to promote economic growth. This can be achieved by protecting the established role of Manor Royal as the leading destination for business-led employment, promoting other Main Employment Areas for flexible economic uses, and positively promoting Crawley as a competitive town centre. The EGA is though indicating that the demand for office floorspace is roughly commensurate with that for industrial land, and both typologies are important to meeting Crawley's identified business land and floorspace needs. For this reason, it would not be appropriate to designate specific location for office use only, as this would likely be unduly prescriptive, and would not help meet identified industrial needs. However, the Local Plan can be supportive to encourage office uses, whilst ensuring that this is not at the expense of delivering industrial land and floorspace. The Local Plan is unable to influence development that is allowed under Prior Approval, for example the potential loss of office space to residential use, although the council has introduced an Article 4 Direction at Manor Royal and is proposing more across the Main Employment Areas and possibly the Town Centre. The plan can highlight through design codes and policy the types of developments that are appropriate in particular locations (see the Manor Royal Supplementary Planning Document (CBC, 2013)), helping to encourage appropriate redevelopment and intensification and help the private sector to meet the needs of individual business and the local economy as a whole. Environmental impacts can be limited and mitigated to some extent through relevant policies.

Indicator No.	Indicator	Crawley Data	Trend	Data Sources
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Indicator No.	Indicator	Crawley Data	Trend	Data Sources
		<p>rate (sqm)            Office: 9,281            Industrial: 9,865            Total: 19,146</p> <p>Gross B-class delivery (excluding 'churn') as a percentage of projected delivery rate            Office: 179%            Industrial: 154%            Total: 166%</p> <p>2017/18            Gross Delivery exc; churn sqm            Office: 20,306            Industrial: 2,345            Total: 22,651</p> <p>Projected delivery rate (sqm)            Office: 9,281            Industrial: 9,865            Total: 19,146</p> <p>Gross B-class delivery (excluding 'churn') as a percentage of projected delivery rate            Office: 219%            Industrial: 24%            Total: 118%</p>		
D2	Comparison of actual and projected losses of B-class employment floorspace to non-employment uses 2015-2018	<p><u>2015/16</u>            Completed losses to non B-uses (sqm)            Office: 11,706            Industrial: 175            Total: 11,881</p> <p>Projected loss rate (sqm)            Office: 4,803            Industrial: 4,092            Total: 8,895</p> <p>Completed losses as a % of projected loss rate            Office: 244%            Industrial: 4%            Total: 134%</p>	Significant PDR losses to residential have informed a higher than anticipated % of losses versus projected losses. 2017/18 has seen a reversal of this trend, possibly a result of Article 4 Directions.	Crawley Authority Monitoring Report.  WSCC HEDNA data.  CBC PDR monitoring.

Indicator No.	Indicator	Crawley Data	Trend	Data Sources
		<u>2016/17</u> Completed losses to non B-uses (sqm) Office: 17,955 Industrial: 3,003 Total: 20,958  Projected loss rate (sqm) Office: 4,803 Industrial: 4,092 Total: 8,895  Completed losses as a % of projected loss rate: Office: 374% Industrial: 73% Total: 236%		
D3	Comparison of net employment floorspace delivery with 'baseline' scenario projected requirement	<u>2017/18</u> Completed losses to non B-uses (sqm) Office: 2,353 Industrial: 3,180 Total: 5,715  Projected loss rate (sqm) Office: 4,803 Industrial: 4,092 Total: 8,895  Completed losses as a % of projected loss rate: Office: 53% Industrial: 78% Total: 64%	Taking losses into account, net delivery of employment space over the period 2015-18 has reached 79% of the identified baseline requirement, with the office and industrial categories achieving 87% and 72% of their respective requirements.	Crawley Authority Monitoring Report.  WSCC HEDNA data.  CBC PDR monitoring.

Indicator No.	Indicator	Crawley Data	Trend	Data Sources
		<p><u>2016/17</u></p> <p>Net delivery (sqm)</p> <p>Office: -1,309</p> <p>Industrial: 10,669</p> <p>Total: 9,360</p> <p>Baseline Requirement (sqm)</p> <p>Office: 4,478</p> <p>Industrial: 5,773</p> <p>Total: 10,251</p> <p>Delivery as a % of requirement:</p> <p>Office: -23%</p> <p>Industrial: 185%</p> <p>Total: 91%</p> <p><u>2017/18</u></p> <p>Net delivery (sqm)</p> <p>Office: 17,771</p> <p>Industrial: -4,998</p> <p>Total: 12,773</p> <p>Baseline Requirement (sqm)</p> <p>Office: 4,478</p> <p>Industrial: 5,773</p> <p>Total: 10,251</p> <p>Delivery as a % of requirement:</p> <p>Office: 398%</p> <p>Industrial: -87%</p> <p>Total: 125%</p>		
D4	Movement of floorspace between B1a/B1b (i.e. 'office') and B1c/B2/B8 (i.e. 'industrial') uses 2015-18	<p>2015/16</p> <p>Office to Industrial (sqm): 5,169</p> <p>Industrial to Office (sqm): 1,818</p> <p>Net increase in Office (sqm): -3,351</p> <p>2016/17</p> <p>Office to Industrial (sqm): 0</p> <p>Industrial to Office (sqm): 1,500</p> <p>Net increase in Office (sqm): 1,500</p> <p>2017/18</p> <p>Office to Industrial (sqm): 0</p> <p>Industrial to Office</p>	<p>There was some movement of floorspace between office and industrial uses during the three-year period. The implications do not seem particularly dramatic for the balance between office and industrial floorspace, with only a slight cumulative trend away from the latter towards the former being apparent.</p>	<p>Crawley Authority Monitoring Report.</p> <p>WSCC HEDNA data.</p>

Indicator No.	Indicator	Crawley Data	Trend	Data Sources
		(sqm): 4,163 Net increase in Office (sqm): 4,163		
D5	Consented B1a/B1b losses to residential use via planning permission and prior approval	2015/16 Office change to resi via prior approval (sqm): 16,723 Office change to resi via planning permission (sqm): 322 Total office to resi consented (sqm): 17,045  2016/17 Office change to resi via prior approval (sqm): 16,911 Office change to resi via planning permission (sqm): 5,083 Total office to resi consented (sqm): 21,994  2017/18 Office change to resi via prior approval (sqm): 8,111 Office change to resi via planning permission (sqm): 88 Total office to resi consented (sqm): 8,199	Permitted development schemes continued to account for the majority of the office floorspace affected by office-to-residential changes of use granted consent in 2017/18. This year saw a fall in the total amount of floorspace subject to such consents when compared with the two preceding years.	Crawley Authority Monitoring Report.  WSCC HEDNA data.  CBC PDR monitoring.

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

- D9 Crawley is well established as a key employment destination in the Gatwick Diamond, and is home to over 3,400 active businesses which generate 95,000 jobs. However, there is a recognised disparity in the generally lower skill levels and income achieved by people that live in Crawley and those of the in-commuting workforce, which are on average higher. This is reflected in Crawley's position close to the bottom of social mobility rankings published in the State of Nation report, where Crawley ranks 304<sup>th</sup> out of 324 local authorities.
- D10 Crawley's resident workforce has a lower than average level of Qualifications at NVQ4 and above (33.2%) when compared to the South East region (42.2%) and Great Britain (39.3%) as a whole. The emerging update to the Economic Growth Assessment (2019) finds that whilst positive steps are being made, the borough is still behind both Horsham (42.3%) and Mid Sussex (46.3%).
- D11 Reflecting the skills' profile, a lower than average proportion of Crawley residents are employed in higher skilled, higher earning occupations, when compared to the South East and Great Britain ratios. The 2014 EGA found average weekly earnings (resident

based) were highest in Horsham and Mid Sussex (£583 and £578 respectively) and above the South East average (£555), but lower in Crawley (£510). Crawley is also below its neighbours in terms of Gross Value Added (GVA), a measure of workforce productivity. Average GVA per Crawley worker is £51,309, compared to £57,141 in Horsham District and £52,840 in Mid Sussex. Crawley's GVA per worker is also lower than the average for South East England (£55,707) and that of the UK as a whole (£51,667).

- D12 Addressing the skills gap is vital to enabling local people to access higher skilled employment, creating the right conditions for career opportunities within the borough. It is also important that Crawley offers the right skills' profile to cater for the needs of current and future employers. Through the council's own research, it is estimated that £49 million GVA per annum is lost through skills' shortages, and working to address the skills' gap will help ensure that Crawley continues to attract inward investment as a preferred location for business.

#### **Likely evolution without the continued implementation of the Local Plan**

- D13 The Crawley Employment and Skills' Plan, launched in 2016, the council has been able to make a significant contribution to addressing the skills gap. Its flagship projects, which include the borough having achieved Construction Industry Training Board (CITB) Skills Academy status, introducing the Developer and Partner Charter and the creation of the council's flagship project, Employ Crawley, have helped address skills gaps in the local workforce to benefit local people and businesses. Through creating different routes to education and higher value jobs, it has helped to empower some of the most disadvantaged residents and has promoted and enhanced the council's commitment to making Crawley a Living Wage zone. Through the updated Crawley Employment and Skills Programme 2019-2024 and joint working with stakeholders, the council is continuing its work to enable Crawley residents to access better quality job opportunities within the town. There is however a significant opportunity for the Local Plan to help facilitate this work to further narrow the skills gap.

#### **What the Local Plan can and cannot do**

- D14 The Local Plan cannot directly ensure that a greater proportion of Crawley residents achieve higher qualifications and access better jobs, though by introducing a skills policy, it can directly ensure that development in the Borough contributes to addressing what is a demonstrable skills gap to help facilitate opportunities for Crawley residents and enhance the work of the Crawley Employment and Skills Programme.

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
D6	Working age population qualified to at least Level 4 or higher	21.5% (2011 Census) 26.9% (EGA 2014) 33.2% (EGA 2019)	SE = 29.9% England = 27.4% (2011 Census) SE = 36.8% England = 34.4% (EGA 2014) SE = 42.2% England = 39.9% (2019)	Crawley still has the lowest percentage of the population with at least a Level 4 qualification within West Sussex, which is below both the South East and national figure	Census 2011 EGA 2014 EGA 2019

#### **Issue: The changing nature of the town centre.**

- D15 The adopted Local Plan 2015 promoted a flexible approach to facilitate regeneration in Crawley town centre, rather than aiming to fulfil retail capacity by promoting a comprehensive retail-led redevelopment scheme. Various sites, were identified as Key Opportunity Sites with significant potential for redevelopment and/or alternative use

including residential in the town centre. The Local Plan was supported by the Town Centre Regeneration Strategy which promoted improvements to the public realm in order to encourage investment by new retailers.

- D16 This approach has been successful, with new residential development north of the Boulevard already occupied and other sites under construction or approved. Public realm improvements in Queens Square and now Queensway /Pavement have encouraged investment and new occupiers such as Decathlon, Metrobank and Starbucks which have enlivened the Square, and enhancing the viability of the town centre. However, there is an increasing trend nationally towards e-retailing which is putting many retailers under pressure, and has caused the closure of several national chains.
- D17 The emerging Retail, Commercial Leisure and Town Centre Neighbourhood Needs Study will provide more information on the need for different types of uses within the Town Centre. However, given the changes in the retail economy, the Local Plan will take an even more flexible approach to the mix of uses which the Town Centre could accommodate, shifting the emphasis away from solely retail uses. Town Centre uses which promote the vitality and viability of the Town Centre are support, with demand at the current time for leisure-focused town centre uses, such as cafes and restaurants particularly prevalent.

#### **Likely evolution without the continued implementation of the Local Plan**

- D18 The flexible approach to accommodating town centre uses is considered critical in providing the additional flexibility that is needed to reflect the NPPF, and respond positively to market signals at a challenging time for retailers, to ensure that Crawley town centre is able to remain competitive. Up-dated policies are therefore important to help encourage investment that promotes the vitality and viability of the town centre, whilst resisting inappropriate development in the town centre, and out-of-centre development.

#### **What the Local Plan can and cannot do**

- D19 The Local Plan can help to deliver a vibrant and competitive town centre that provides a wide range of main town centre uses including retail, leisure, recreation, and community services, as well as residential use. This can be delivered through allocating sites for mixed use developments and promoting flexible policies that will promote a retail heart, encourage a range of other town centre uses, attract footfall and promote an attractive and pleasant town centre environment. It can also go some way to ensuring that it is fully accessible by sustainable modes of transport. There are other aspects to improving the town centre that are largely beyond the Local Plan's control however, such as tackling antisocial behaviour (although measures such as Secured by Design can play a role), the nationwide growth in online retailing, and the availability of finance for developers.

#### **Issue: An Increasing Town Centre Residential Population**

- D20 At the heart of Crawley is the Town Centre, planned as a retail, commercial and civic centre as part of the New Town, extending from the historic High Street and around Queens Square. It is now an important sub-regional destination for retail and leisure, and a designated Main Employment Area in the Local Plan. Historically, there had been very limited residential accommodation in the centre. However, the Local Plan recognises the Town Centre as a sustainable place for people to live and its residential population has increased in recent years.
- D21 The number of residents living in the Town Centre has significantly increased, and from a starting point of 214 residential units in 2014, and through both planned development and prior approval schemes there are now 831 dwellings in the Town Centre. It is anticipated that, over the Plan period to 2035, a further 2,200 dwellings will come forward in the Town Centre, bringing the total to just over 3,000 residential units.

D22 Moving forward significant new residential developments are planned and it is recognised that the Town Centre, as well as being a retail, leisure and employment destination, is becoming a neighbourhood in its own right. Having a residential population benefits town centre viability and vitality, and enables people to live in a highly sustainable location with excellent public transport links. However, the Town Centre does not offer the community services and facilities that are provided within Crawley's residential neighbourhoods, for example schools, open space, health. Given the increasing residential population living in the town centre, it will be important to ensure that the facilities and services required to support the day-to-day needs of a growing Town Centre residential population are in place. Where Town Centre residential has come forward through prior approval, it has not been possible to secure developer contributions towards infrastructure provision.

#### **Likely evolution without the continued implementation of the Local Plan**

- D23 Without a Local Plan in place, it will be challenging to ensure that residential development in the Town Centre comes forward in a well-planned and designed manner that contributes positively to Town Centre vitality and viability and people's quality of life. It would not be possible to secure, where planning permission is required, developer contributions towards the infrastructure and services required to support the Town Centre residential population.
- D24 Whilst it is possible that without a Local Plan, some of the facilities and services needed to support the Town Centre residential population may come forward through the market. However, some of these uses are not identified in the NPPF as main town centre uses, for example community facilities, and therefore national policy would not necessarily help address some requirements.

#### **What the Local Plan can and cannot do**

- D25 The Local Plan can help ensure that residential development in the Town Centre comes forward on a planned basis, helping to ensure it provides a good quality of life for its occupiers, for example through securing appropriate space standards, noise mitigation, amenity and waste servicing. Equally, where planning permission is required, it is possible to ensure that residential use does not undermine existing town centre operations, for example the evening and night time economy, through the 'agent of change' principle. The Local Plan can help secure, where planning permission is required, developer contributions that are essential to supporting infrastructure, facilities and services that are needed to support its residential population.
- D26 The Local Plan cannot control residential development introduced through permitted development rights, nor associated issues such as lack of bin storage and supporting facilities, unless an Article 4 Direction is put in place. It cannot stop a particular type of retailer from change to an alternative retailer within the same Use Class, nor can it prevent movement between Use Classes where this is subject to a national permitted development right.

## **Topic Area E – Natural Environment**

Including: countryside, landscape, biodiversity, fauna, flora and soil

*SEA Directive – Biodiversity, Landscape, Air Quality, Fauna, Flora and Soil*

### **Introduction**

- E1 Although the borough is predominately urban, there are small areas of countryside fringing the urban area which is of significant importance to the setting of the town and the biodiversity within and surrounding it. In addition, green infrastructure routes are common within the town and these, in conjunction with the urban fringe areas, facilitate the movement of wildlife through the town. These areas also play a role in the maintenance of air quality in the town, mitigating against the urban heat island effect, and some of the pollutants associated with an urban area and an international airport. However, in light of development pressure and limited funding for their improvement, the natural environment of Crawley is particularly under pressure.
- E2 The 25 Year Environment Plan, the National Pollinator Strategy 2014 and West Sussex's Pollination Action Plan 2019-2022 are current national and county plans that are encouraging a movement towards a net gain in biodiversity and natural capital. Within Crawley's tight administrative boundaries smaller proposed interventions and urban innovative solutions are necessary combat natural capital decline through new development putting pressure on available open space.

### **Relevant Plans, Policies and Programmes**

- E3 For the purposes of this draft SA Report, only the key plans relating to this SA Topic Area are introduced. The list provided is not meant to be exhaustive but to indicate the plans with the most relevance. The relevant plans for this Topic Area are:

#### **General**

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

#### **Landscape/Countryside**

- National Planning Policy Framework (MHCLG, 2019)
- Crawley Landscape Character Assessment (CBC, 2012)
- High Weald AONB Management Plan (2019-2024)
- Built-Up Area Boundary Review (CBC, 2015)
- Crawley Open Space Study (2013) JPC Strategic Planning and Leisure Limited
- Crawley Playing Pitch Assessment (2013) JPC Strategic Planning and Leisure Limited
- West Sussex Sustainability Strategy (2015-2019)
- West Sussex Sustainability Action Plan 2015-2019
- West Sussex Landscape Character Assessment, (Land Management Guidelines for Northern Vales, High Weald Forests and adjacent High Weald) (WSCC, 2003)
- High Weald AONB Management Plan 2019-2024 (High Weald Joint Advisory Committee, 2019)

#### **Biodiversity**

- National Planning Policy Framework (MHCLG, 2019)
- Net Gain: Consultation Proposals (DEFRA, 2018)
- Planning for Biodiversity and Geological Conservation: A Guide to Good Practice (DCLG, DEFRA and English Nature, March 2006)

- A Biodiversity Action Plan for Sussex (Sussex Biodiversity Partnership, 1998)
- Biodiversity 2020: A Strategy for England's wildlife and ecosystem services
- Biodiversity Action Plans – Woodland, Urban (Sussex Wildlife Trust)
- Sites of Nature Conservation Importance (SNCI) & Wildlife Sites Review (Dolphin Ecological Surveys, September 2010)
- Pollinator Action Plan 2019-2022 (WSCC, 2019)
- National Pollinator Strategy: for bees and other pollinators in England 2014-2024 (Defra, 2014)
- A Green Future: Our 25 Year Plan to Improve the Environment (Defra, 2018)

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

- E4 There are no Special Protection Areas (SPAs), Special Areas of Conservation (SACs) or Ramsar sites within the borough. However, the Ashdown Forest SPA and SAC and the Mole Gap to Reigate Escarpment SAC are both within 15 km of the borough's boundary. Therefore, the council has published a Screening Report alongside the SA Scoping Report to establish whether the Local Plan will need to be subject to an Appropriate Assessment. Ashdown Forest SPA and SAC are designated for healthland, great crested newts, nightjars and Dartford warblers. Mole Gap to Reigate Escarpment SAC is designated for its box scrub, grasslands, woodlands, heaths, great crested newts and Bechstein's bats. Additional development in Crawley can reasonably be expected to result in an increase in numbers of people visiting these sites, and travelling through them. It is not expected that this impact will be significant. However, the HRA Screening Report recommends further work to be undertaken in relation to assessing the 'in combination' effects arising from the Plan when added to the other Plan in the area.
- E5 The borough has designated 12 Sites of Nature Conservation Importance (SNCIs) covering 330.1 hectares in total. SNCIs are designated for their local flora and fauna interest and value. These sites incorporate semi-natural woodland, conifer and mixed plantations, copses, hedges, neutral grassland, species rich grassland, heathland, and streams and ponds. Amongst the species found within the borough are several identified in the Sussex Biodiversity Action Plan (BAP), which are also subject to protection under British and European legislation. These include Kingfishers, Nightingales, Adders, Palmate Newts, Water Shrews, Orange-tip and Holly Blue Butterflies, Small-Leaved Limes, Betony and Common Spotted Orchids. The borough also contains several areas of importance to BAP Habitats.
- E6 A GIS-based desktop study of the ecological networks and the services they offer the borough has been undertaken. These include: accessible nature; air purification; carbon storage; education; green travel; local climate; noise regulation; pollination; and water purification.
- E7 There are 6 Local Nature Reserves covering 279.8ha land in Crawley, which have wildlife and/or geological features that are of local importance: Target Hill, Grattons Park, Tilgate Forest, Broadfield Park, Waterlea Meadows and Willoughby Fields. There are 193.5 hectares of Ancient Woodland within the borough and a significant number of large environmentally valuable trees scattered throughout the town that are under increasing pressure from development and the availability of funds for maintenance. The loss of these features would alter the character and appearance of the town.
- E8 When designated as a New Town, Crawley was planned with significant amounts of green spaces within the built up area to provide an attractive layout and to help distinguish between the different neighbourhoods. The 2008 Planning Policy Guidance 17 (PPG17): Open Space, Sport and Recreational Assessment identified significant amounts of valuable green spaces within the town. At that time, there were 32 areas of open space such as parks and nature conservation areas including 26 Playing fields;

more than 70 children's play areas and 19 Allotment sites. There is currently 1.76 ha of park and garden space per 1000 population in Crawley, which is comparatively high for an English town. Crawley's Open Space, Sport and Recreation Study 2013 updated the council's evidence base in relation to open space and playing pitches. These spaces have a multi-functional role: being fundamentally important to the structure of the town; providing recreation space; playing an ecological role for the movement of wildlife; mitigating the impact of climate change; and helping to alleviate the risk of flooding. These spaces are increasingly coming under pressure from infill development. An updated Open Space, Sport and Recreation study is currently being undertaken to assess the borough's open space needs and provision.

- E9 Through previous consultations, the residents of Crawley were satisfied with the current levels of open space and recreation facilities available. It has been noted that parks and gardens are of particular importance to local residents for both recreational and aesthetic importance. Therefore, it is vital to maintain and improve the quality of parks and gardens to preserve the quality of life for residents and visitors.
- E10 In summary, Crawley has very good quantity and quality of green and open space within the town, which is valued extremely highly by local residents. It is important that the current provision is improved in some instances (such as to provide a better connected green infrastructure network, and adding facilities for older children), although the loss of green space would have to be considered against the other SA Objectives of the Plan. These spaces and facilities are likely to come under increasing pressure from development and the growing and changing needs of the population as highlighted in Topic Area C – Housing and Topic Area B – Heritage, Character, Design and Architecture.

#### **Likely evolution without the continued implementation of the Local Plan**

- E11 It is difficult to predict what the impact might be without the continued implementation of the Local Plan. The existing policies provide protection to these areas. In addition, in trying to meet housing requirements, the Local Plan allocated one of these sites as a Housing, Biodiversity and Heritage site. A further site was designated as a Local Green Space site, for its recreational, biodiversity, heritage and accessible countryside values. However, national guidance requires local policies to be set in an up-to-date Local Plan. Therefore, without the continuation of the Local Plan, through the Local Plan Review, it is likely that the council will have less control over which sites are protected as the existing policies become more outdated, leading to loss of areas of open space/biodiversity that are more valued than other more suitable sites for development.
- E12 Furthermore, national policy, planning and environmental, has evolved since the Local Plan was adopted. Government policies on Biodiversity net-gain and greater awareness surrounding biodiversity through Pollination Plans e.g. National Pollinator Strategy for bees and other pollinators (2014) require their implementation into policies within the Local Plan to provide better protection for green and open spaces. In particular, greater weight is placed now on securing a 'net gain' in biodiversity, and ensuring this is secured through new development is becoming mandatory, as well as addressing the need to meet the needs of pollinator species. The current Local Plan policies have this as an aspirational aim but it is not explicit, and a clearer local policy framework will better meet the national expectations.

#### **What the Local Plan can and cannot do**

- E13 Through appropriate identification and designation, the areas of the town with high ecological and biodiversity value can be protected to a high degree. Trees, on their own, or in groups, can be protected by Tree Preservation Orders if considered to make a particularly important contribution, especially if they are perceived to be under threat. The designation of Local Wildlife Sites (previously known locally as Sites of Nature Conservation Importance) is done independently from the planning system, through a

panel of sub-regional experts (and overseen by the Local Nature Partnership and Biodiversity Record Centre). Unfortunately, securing funding for the management and improvement of these areas has been largely outside the remit of the Local Plan, particularly where these sites fall outside of public ownership.

- E14 However, through the introduction of a mandatory requirement to secure net gain, the government are consulting on opportunities for securing financial contributions, where on-site mitigation and compensation is insufficient to deliver the full net gain for biodiversity required for the site. This may begin to provide greater funding opportunities to be directed towards agreed improvements across the Green Infrastructure network.
- E15 Open space and structural landscaping policies have the potential to maintain a sufficient amount of space to meet the needs of residents and to enhance them in some circumstances. Currently policy exists to achieve this, but their effectiveness is an issue. The potential for a new designation proposed in the NPPF: a Local Green Space has been explored with residents and has resulted in the proposed Local Green Space at Ifield Brook Meadows and Rusper Road Playing Fields.
- E16 The council has limited influence on the growth of the population and the pressures it places on the provisions of open space and recreational facilities. Policy can aim to preserve existing routes to the countryside and ensure that existing levels of recreational provision are maintained in a qualitative sense only, because new provision within the borough's boundaries is unlikely other than when it is provided as part of large developments. Small changes to structural landscapes and soft landscape areas may need to be considered to enhance biodiversity protection in the town.
- E17 Policy can aim to encourage interventions on smaller sites that lead to a net gain in biodiversity with considerable thought given at early stages of the design and layout of the development. Consideration for green roofs and green walls can be encouraged through the local plan. Furthermore, the Local Plan can highlight the value and benefit of Local nature Partnerships with companies and NGOs that promote sustainable interventions and a prosperous natural capital resource.

<b>Indicator No.</b>	<b>Indicator</b>	<b>Crawley Data</b>	<b>Data Sources</b>
<b>E1</b>	Amount and type of development within areas designated for their nature importance	2017/18: 5 applications for development close to sites designated for their nature importance.  2016/17: 5 applications for development close to sites designated for their nature importance.  2015/16: 4 applications for development close to sites designated for their nature importance.	CBC  Sussex Biodiversity Record Centre
<b>E2</b>	Amount of trees with Tree Preservation Orders lost per annum	2017/18: approval was given for the removal of 39 TPO trees; conditions required 27 to be replaced; overall deficit of 12.  2016/17: approval was given for the removal of 59 TPO trees; conditions required 24 to be replaced; overall deficit of 35.  2015/16: approval was given for the removal of 73 TPO trees; conditions required 60 to be replaced; overall deficit of 13.	CBC

Indicator No.	Indicator	Crawley Data	Data Sources
E3	Amount and type of open space, sport and recreational spaces lost/gained per annum	Not currently monitored however, future data will serve as baseline	CBC

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

- E18 In the future, it is possible that climatic factors could affect the ecological and landscape resources of the borough. There is already clear evidence to show that climate change has resulted in effects to flora and fauna including changes in populations, ranges, migration patterns and seasonal and reproductive behaviour of certain species. Such effects are likely to become more apparent and extensive as the climate continues to change.
- E19 There are sections of the borough that are used for agricultural purposes. The Agricultural Land Classification (ALC) maps for West Sussex indicate that the agricultural land within Crawley is a mixture of Grades 3 and 4 (on a scale of 1-5 where 1 is the best and most versatile land, and Grade 5 land is 'very poor').
- E20 There are five main types of soil found across the borough. The majority of the borough lies on two main types of soil: 'slightly acid loams and clays with impeded drainage' and 'slow, permeable and seasonally wet, basic loams and clays'. The remaining soil types are 'naturally wet, loamy soils', which are found in the North East Sector and stretching across Furnace Green, Maidenbower and Worth; a small patch of 'Naturally wet, loamy and clayey floodplain soils' along the River Mole and the very southern extremity of the borough lies on 'Freely draining, slightly acid loamy soils'. This precedence of relatively poor-draining soil has implications for flood risk discussed in Topic Area A.
- E21 Increased development pressures in and on the fringes of the borough could reduce the quantity of these natural resources and their quality in adjoining areas. Insensitive design and execution of development could result in unacceptable losses of valuable resources and increased pollution from water run-off from built up areas. The existing structure of the town has retained the potential for biodiversity and green networks, and mitigates the urban heat island effect to some extent, but this could be lost with increased development on existing open spaces, to the detriment of human quality of life, and impacting the quality of biodiversity in the town.

### **Likely evolution without the continued implementation of the Local Plan**

- E22 Whilst national efforts at tackling issues such as climate change might lead to an improvement over the short to medium term; it is likely that the effects could be significant in the long term. Unplanned urban development could accelerate adverse impacts on biodiversity and the loss of soil.

### **What the Local Plan can and cannot do**

- E23 In the absence of the Local Plan, which can set policies on climate change mitigation and adaptation, it is likely that the effects outlined above would become more pronounced. Policies specific to issues such as construction practices, green infrastructure and trees are likely to help in the preservation of these environmental resources. The impact that new developments will have on climate change can also be reduced through appropriate national and locally specific policies aimed at reducing CO2 emissions.

Indicator No.	Indicator	Crawley Data	Data Sources
E4	Change in areas of biodiversity importance	Total area of open space and natural habitats = 500 hectares (12.9%). No direct loss of sites designated for their biodiversity importance.	CBC

<b>Indicator No.</b>	<b>Indicator</b>	<b>Crawley Data</b>	<b>Data Sources</b>
		One site has been allocated as a Key Housing: Housing, Biodiversity and Heritage site through the adopted Local Plan. A Development Brief is being prepared to ensure that whilst there will be a significant loss of the nature conservation value on half of the site, mitigation, enhancements to the remainder of the site, and compensation will seek to maintain an overall net gain in biodiversity.	
<b>E5</b>	Improved Local Biodiversity – proportion of Local Sites where positive conservation management has been or is being implemented - District (CBC)	CBC has 12 SNCI sites and of these 9 are actively managed. The 3 other sites are privately owned and as such CBC have no control over the management of these sites.	CBC Sussex Biodiversity Record Centre

## **Topic Area F – Transport and Infrastructure**

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

### **Introduction**

F1 Crawley's position at the geographical heart of the Gatwick Diamond economic area combined with excellent transport links including the London-to-Brighton and London-to-Southampton rail links, and Three Bridges to Cambridge and Peterborough, rail links, Gatwick Airport and the M23 motorway, has meant that Crawley is an attractive business location. As a result, there are more jobs than the working age population of the borough, and businesses within the town draw their workforce from the wider area. Over 46 million passengers per annum also fly via Gatwick Airport. Hence, both the inter- and intra-transportation network is of particular importance to the borough. Crawley's role within the Gatwick Diamond means that significant new growth is anticipated in and around the borough with 5,000 new homes anticipated within Crawley during the Plan period and the possibility of significant urban extensions immediately outside Crawley's boundary also being pursued through adjoining authorities' plans. New employment floorspace is also anticipated. A thorough consideration of the strategic infrastructure network is to be undertaken to ensure that development does not outstrip essential infrastructure, such as sewerage and water (See Topic A). The transportation considerations for the borough's development are outlined in further detail below.

### **Relevant Plans, Policies and Programmes**

F2 For the purposes of this SA Report, only the key plans relating to this Topic Area are introduced. The list provided is not meant to be exhaustive, but to indicate the plans with the most relevance. The relevant plans for this Topic Area are:

#### **General**

- National Planning Policy Framework (MHCLG, 2019)

#### **Infrastructure**

- National Planning Policy Framework (MHCLG, 2019)
- National Infrastructure Assessment (National Infrastructure Commission, 2018)
- White paper: Industrial Strategy (BEIS, 2017)
- Clean Growth Strategy (BEIS, 2017)
- Community Infrastructure Levy Regulations 2010 (as amended)
- Planning Act 2008
- Crawley Growth Deal (WSCC, 2016)
- Crawley Infrastructure Plan (CBC, 2014)
- Crawley Draft Infrastructure Plan (CBC, 2019)
- Thames river basin district river basin management plan (DEFRA, 2018)
- South East river basin district river basin management plan (DEFRA, 2018)
- Draft Water Resources Management Plan 2019 (Thames Water, 2018)
- Draft Water Resources Management Plan 2019 (South East Water, 2018)
- Draft Water Resources Management Plan 2019 (Sutton and East Surrey Water, 2018)
- Water Resources Management Plan for 2015-40 (Southern Water, 2014)
- Gatwick Sub-Region Water Cycle Study (Entec UK Ltd, 2011) and 2013 update

#### **Transport**

- National Planning Policy Framework (MHCLG, 2019)
- Economic Connectivity Review (Transport for the South East, 2018)
- Inclusive Transport Strategy (DfT, 2018)
- Cycling and Walking Investment Strategy (DfT, 2017)
- A Strategic Vision for Rail (DfT, 2017)
- Transport Infrastructure Efficiency Strategy (DfT, 2017)

- West Sussex Walking and Cycling Strategy 2016-2026 (West Sussex County Council, 2017)
- Transport Modelling Part 1 (Amey Consulting, 2012)
- Transport modelling Part 2 (Amey Consulting, 2014)
- Local Transport White Paper: Creating Growth, Cutting Carbon (DfT, 2011)
- Crawley Growth Programme
- Rail Utilisation Strategies – London and the South East (Network Rail, 2011)
- West Sussex Local Transport Plan (LTP3) 2011 – 2026 (WSCC, 2011)
- National Travel Survey 2017
- Emerging Transport Strategy for the South East (TfSE, ongoing)
- Mapping the Region's Transport Challenges (SEERA, 2009)
- The Department for Transport's Draft Guidance to Regions on Delivering a Sustainable Transport System (DaSTS, 2008)

### **Gatwick**

- Aviation Policy Framework (DfT, March 2013)
- Aviation 2050; The Future of UK Aviation Consultation (DfT, December 2018)
- Airports National Policy Statement (HM Government, 2018)
- Beyond the Horizon; The Future of Aviation; Making Best Use of Existing Runways (HM Government, June 2018)
- 2019 Legal Agreement between CBC, WSCC and the airport operator
- Draft Gatwick Airport Master Plan (Gatwick Airport Limited, October 2018)
- Gatwick Airport Surface Access Strategy (Gatwick Airport Limited, May 2018)
- Gatwick Airport Interim Parking Strategy (Gatwick Airport Limited, February 2017) Your Journey to Work: Staff Travel Plan 2013-2030 (Gatwick Airport Limited)
- Control of Development in Airport Public Safety Zones (Circular 01/2010)
- Revised Public Safety Zones at Gatwick Airport (CAA, 2011)
- Safely Landed? Is the current aerodrome safeguarding process fit for purpose? (Lichfields, 2018)

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

F3 The strategic roads serving Crawley include the Trunk Road network comprising of the M23/A23 London to Brighton corridor, as well as four key A roads: the A264 Crawley Road, the A2220 Horsham Road, the A2011 and the A23 Crawley Avenue / London Road.

F4 Recent assessments of the current performance of the road network in Crawley suggest that weekday peak period congestion is regularly experienced on key links and at key junctions. Key congestion points are as follows:

- Junction 11 of the M23 (A264/A23) Pease Pottage interchange;
- Junction 10 of the M23 (A264) Copthorne interchange;
- The junction of the A264 and the A2220;
- Junctions between the A23 and the A2220, Gossops Drive, Haslett Avenue East, and Ifield Avenue;
- Most of the links on the A23.

F5 There are already a number of committed developments that will create additional travel demand in the future and the pressure will only be increased by any additional development proposed in the updated Local Plan. The Highways Authority has previously undertaken a study that has shown that in order to accommodate future growth including traffic from all planned development as set out in the former South East Plan within the Gatwick Sub-region, all junctions on the M23 at Crawley with the exception of junction 10a, will need to be improved. The Highways Authority also identified that improvements will be required at:

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

- F6 In addition, the Crawley Local Plan Transport Modelling (Stage 1 and 2) confirmed that the development proposals within the 2015 Local Plan would not severely affect the transport network within Crawley. An updated Transport Assessment will be required in order to assess this in relation to the updated Local Plan. However, with further planned through the Local Plan 2035, significant growth at Gatwick Airport, and major development being promoted to the west of Crawley, it is possible that a new Western Relief Road may be required.
- F7 In addition to the convergence of the strategic road network at Crawley, two railway lines serve Crawley: the London-Brighton railway, and the Arun Valley railway which branches off the London-Brighton line at Three Bridges and serves Horsham, Arundel and the south coast between Bognor Regis, Portsmouth and Southampton. There are currently four railway stations in Crawley:
- Gatwick Airport – located on the London-Brighton line;
  - Three Bridges – located on the London-Brighton line;
  - Crawley – located on the Arun Valley Line; and
  - Ifield – located on the Arun Valley Line.
- All four stations have seen an increase in passenger usage over the past three years and Gatwick Airport Station is now the 22<sup>nd</sup> busiest station in the UK in terms of passenger usage. The new Thameslink services from Peterborough and Cambridge to Three Bridges and Brighton are increasing pressure on the Brighton Mainline through Crawley.
- F8 In addition, the developers of Kilnwood Vale to the west of Crawley have been in discussions with Network Rail, WSCC, GTR and DfT, regarding the possibility of a new station within that development. Policy WB 24 in the West of Bewbush Joint Area Action Plan (July 2009) safeguards land for a railway station, pending a definitive decision by Network Rail. The outcome of these discussions is not yet conclusive. It is the position of Network Rail that any further development that would increase demand at Ifield station should consider the need to provide improvements to the station platforms, and disabled access.
- F9 There is a well-established and growing bus passenger market in Crawley. Crawley is well served by conventional bus services and the Fastway high quality bus network. Fastway is a network of premium bus services combining high quality vehicles, passenger facilities, real time information, high frequency and 24/7 services, bus priority and kerb-guidance busway. The system was commissioned in 2003 and various new routes have been added.
- F10 The patronage of Fastway, which operates three routes, has grown steadily since it opened. The percentage of commuters using buses to travel to work is significantly higher in Crawley in comparison to the rest of the South East Region, although it still represents a relatively small proportion of the total figure.
- F11 There are some 26km of cycle paths in Crawley including The Downs and Weald cycle route of the National Cycle Network. Further extensions are planned.
- F12 Through Crawley Growth Programme, further sustainable transport infrastructure and highway upgrades are planned to boost overall transport capacity and enable a significant shift from car usage to bus, rail, cycling and walking alternatives. Connectivity enhancements at the major railway stations of Crawley, Three Bridges and Gatwick Airport will greatly facilitate commuter access to Manor Royal and the Town Centre via sustainable transport connections.

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

- F13 Gatwick Airport currently sees an annual throughput of over 46 million passengers. It is estimated that within its current configuration it could cater for up to 61mppa by 2032. The draft Gatwick Airport Masterplan also includes proposals to use the existing standby runway which would increase capacity to over 70mppa. This would be a Nationally Significant Infrastructure Project and would be considered by the Planning Inspectorate through the Development Consent Order process. The growth of the airport generates pressures on infrastructure such as transport links as well as the demand for power and water and waste disposal; and has environmental impacts on air quality, noise and water quality and climate change implications. The latest Section 106 agreement signed in 2019 by Gatwick Airport Limited, CBC and WSCC contains a wide range of obligations which seek to mitigate the environmental effect of growth at the airport through a range of activities and requirements. Current government policy also requires the Local Plan to safeguard land for a further runway at Gatwick, although the council is requesting additional clarity on this requirement as the Aviation Strategy is currently being updated.
- F14 The Gatwick Airport S106 Agreement sets the obligation that 48% of non-transfer passengers should be using public transport to access the airport by 2022, up from the 2015 figure of 40% (stretch target to 45%). A target of 42% of staff journeys by sustainable modes has also been set. The latest Gatwick Airport Surface Access Strategy modal share information indicates that the Airport currently sustains a public transport mode share for passengers of 44% (39% by rail).
- F15 The airport operator is required, through the S106 legal agreement, to prepare an Airport Surface Access Strategy to address and appropriately manage the surface access need of aircraft passengers and staff. Despite the success in meeting its public transport mode share targets, achieving the 48% target still requires the provision of significant parking facilities for those who chose to drive to the airport by private car. Controlling the extent of airport related parking, Sites within the airport boundary provide the most sustainable location for the additional long stay parking which needs to be provided as passenger throughput grows whilst still supporting the public transport target. Sites within the airport boundary are close to the terminals and can help reduce the number and length of trips.
- F16 The expansion of the airport, possibly as a two runway operation, in combination with the delivery of new employment and housing is likely to place greater strains on the transport infrastructure within Crawley and the surrounding sub-region.

**Likely evolution without the continued implementation of the Local Plan**

- F17 Without the Local Plan, the council would not have a strategic vision for the borough's transport system and therefore, whilst small improvements could continue to be made, the transport infrastructure would struggle to cope over the long-term, especially in light of the level of proposed development, and the historic trend for in-commuting from areas beyond the borough boundary. The Local Plan Review also sets out the challenge of development beyond Crawley's boundaries and the expectation that it should address the impact it will have on Crawley's infrastructure.
- F18 The updated Local Plan will provide a local policy context for the development of Gatwick and helps ensure that development at the airport is airport-related and its environmental impact is managed, and economic benefits are maximised for the local area. The Local Plan policies are vital in ensuring that the airport is able to meet its sustainable transport obligations set out in the S106 legal agreement. Without the Local Plan there could be greater demand for development at the airport and the management of its environmental impact would be more limited.

## What the Local Plan can and cannot do

F19 A priority for the Local Plan Review is to create a safe and efficient transport network that can support the town's continued growth. Policies in the updated Local Plan will limit development that adversely impacts upon the network unless appropriate mitigation is provided and will seek the provision of appropriate infrastructure to support new development. The Local Plan cannot secure funding for the delivery of major, strategic infrastructure which is required to serve cumulative developments some of which may be beyond the borough's boundary.

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
F1	Access to services and facilities by public transport, walking and cycling	2010 Accession mapping indicates Crawley has good access to services via public transport. See Maps at Appendix C			Former NI 175
F2	Children travelling to school – mode of transport usually used	January 2011 Bus (type not known) – 3.3% Public Service Bus – 4.8% Car – 19.7% Car Share – 6.6% Cycle – 2.7% Dedicated school bus – 2.5% Train – 0.1% Taxi – 0.6% Walk – 59.4%	(2008/09) WSCC 5-10 Years: Car- 35.6% Car Share – 6.3% Public transport – 2.3% Walking – 53.8% Cycling – 1.7% Other – 0.3% 11-16 Years: Car- 16.8% Car Share – 3.5% Public transport – 27.7% Walking – 43.5% Cycling – 7.9% Other – 0.5%	Data for Crawley indicates a higher proportion of sustainable travel than in 2010. Fewer pupils are cycling to school, but proportions of walking, bus and car-share journeys are higher.	Former NI 198 West Sussex County Council – Jan 2011 School Census
F3	Number of passengers using Gatwick Airport per annum (and percentage arriving by public transport)	2013: 34.9m (42.6%)  2014: 37.9m (41.4%)  2015: 39.6m (44.4%)  2016: 42.1m (42.6%)  2017: 44.8m (43.9%)		Passenger numbers are predicted to increase to exceed 45 million passengers per annum from 2018. The percentage of international air passengers at Gatwick has grown faster than that for domestic passengers. SAAP target for 40% public transport access has been exceeded in recent years.	CBC

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
F4	Number of people killed or seriously injured in road traffic accidents per 100,000	2011-13: 34.5 2012-14: 38.2 2013-15: 38.8 2014-16: 42.1		There is no distinct trend in Crawley. There are an average of approximately 0.4 KSI per 1000 of the population over recent years	

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

F20 Discussions with key utility infrastructure providers have indicated that sufficient infrastructure should be in place to support the borough's continued growth within currently planned limits. New residential development needs to be carefully managed, with a consistent rate of delivery, to ensure that the appropriate infrastructure is delivered in tandem. This is particularly an issue for the water and sewerage providers because current funding regimes only operate over five year periods; therefore it is difficult to guarantee capacity being available over longer periods. Where major strategic development is situated in other Local Authority areas, but is located adjacent to Crawley's boundary, this places further pressures on the infrastructure that supports Crawley.

**Likely evolution without the continued implementation of the Local Plan**

F21 Without the continued implementation of the Local Plan, the borough's infrastructure would struggle to keep pace with the town's development because although the town has an adopted Infrastructure and S106 Agreements SPD, it would not be able to provide for specific items of infrastructure needed in certain locations.

**What the Local Plan can and cannot do**

F22 Through monitoring and specific policies, the Local Plan Review can help to control the rate of development in the town, subject to the availability of infrastructure as indicated by the relevant service providers. Further infrastructure provision can be secured through Planning Obligations, S106 Agreements and the Community Infrastructure Levy being implemented by the council.

F23 However, providing new infrastructure has a limited mitigating effect on congestion. There is a need to try and discourage unsustainable forms of transport and encourage more sustainable modes, such as walking, cycling and public transport. The Local Plan Review can influence this to a certain extent for example through car parking standards, bus priority measures, or creating public transport interchanges, although, there are other methods that are beyond the planning process (e.g. congestion charging, public transport incentives etc.). The identification of a transport strategy for the town has formed an important part of the proposals to mitigate the impact of new development on Crawley's residents and local environment.

## **Topic Area G - Population, Community Facilities, Crime and Health of the Community**

Including: demographics, educational establishments, open space, sport and recreation provision

*SEA Directive – Population, Human Health*

### **Introduction**

G1 Understanding any changes or growth in the population of the borough is fundamental in providing sufficient and appropriate community facilities. Crawley is a compact town with a population of around 106,000. The ethnicity of the borough is diverse and the demographic structure is one dominated by a young adult population with children. Those people who first moved to the area back in the 1950's are now growing older and although they do not represent the majority in terms of population structure their needs are perhaps greater. Even across the young adult population there are variations in the types of people living in the town with a mix of young families, singles who have moved into the area looking for executive style living, and those who have lived in the area for some time, who perhaps do not have the means to buy their own home and are dependent on the state for support. Inevitably the different people living in the town have different issues regarding their social, health and environmental wellbeing and it is therefore important not to focus too much on Crawley as one town, but rather a series of different areas, groups and types of people with very different needs, wants and aspirations. This is reflected in the indices of multiple deprivation, where there are notable differences between the east and the west of the borough.

### **Relevant Plans and Policies**

G2 For the purposes of this SA Report, only the key plans relating to this Topic Area are introduced. The list provided is not meant to be exhaustive but to indicate the plans with the most relevance. The relevant plans for this Topic Area are:

#### **General:**

- National Planning Policy Framework (MHCLG, 2019)
- Reuniting Health with Planning – Healthier Homes, Healthier Communities (TCPA, 2012)
- Gatwick Diamond Local Strategic Statement (Chilmark Consulting, 2017)
- Infrastructure Delivery Plan (CBC, 2014)

#### **Health:**

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

#### **Education**

- Planning School Places 2019 (WSCC, 2019)

#### **Crime and Fear of Crime**

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

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

G3 The Census 2011 estimated the population of Crawley as 106,597 and it is projected that there will be a 7.8% increase by 2016. This trend is expected to continue and as supported by the Strategic Housing Market Assessment, the need for increased housing delivery in terms of total provision and to meet type and tenure demand will increase. The challenge will be to try to meet the needs of the currently young

population (the largest age group being between 30 and 44) whilst providing more assisted living and bungalow housing options for the predicted increase in over 65s. Meeting these broad needs for housing is challenging for the authority, yet crucial to achieving a strong, cohesive and successful community. The housing issue is discussed further in Topic Area C.

- G4 The 2011 Census indicates that 20% of the resident population is under 15 years of age (compared to 17.7% for England), 61.6% is between 15 and 59 (compared to 59.5% in England and Wales) and 18.4% is aged 60 and over (compared to 22.8% in England and Wales). This shows that Crawley has a population profile broadly in line with the national average with a slightly above average working age population.
- G5 In light of this position, the provision of appropriate community infrastructure designed to meet the needs of changing demographics in the town will be important in maintaining the quality of life for residents. This is an area where further clarification is being sought as part of the Local Plan Review.

#### **Likely evolution without the continued implementation of the Local Plan**

- G6 The problem of insufficient facilities to meet community needs is likely to become more acute if the Local Plan is not updated to plan for changing demographic trends. Whilst essential infrastructure can be delivered without the Local Plan, understanding projections and likely population is more complex without the certainty provided by allocation and anticipated growth and capacity figures established in the Local Plan.

#### **What the Local Plan can and cannot do**

- G7 The council can have no direct influence over the way in which the population of Crawley grows and changes but through policy, can to some degree, seek to meet needs of the changing population through the location and type of housing, jobs and community facilities. The council can also seek funding for facilities through S106 and the Community Infrastructure Levy, and plan for their implementation during the Local Plan period.

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

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
	live at home for as long as they want to			mortgage.	
G3	Overall satisfaction with local area	74.9%	England 78.16%	Significant increase from the 06/07 result of 53% People living in Maidenbower, Southgate and Three Bridges tended to be more positive while those living in Bewbush and Broadfield were more inclined to be less satisfied. Younger people were more likely to be less satisfied.	Former NI 5 2008/09 Place Survey

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

G8 Crawley (Census, 2011) has a larger ethnic minority population than the national average and the average for the South East. The largest minority groups are Asian/Asian British: Indians who represent 5.2% of the population of the borough; and Pakistani who represent 4.3%. This is in comparison with 2.6% and 2.1% respectively of the national population. Electoral Roll Data recorded 61 different nationalities from the EU and Commonwealth countries alone also highlighting the enormous diversity in Crawley's population. With a wide ranging ethnic structure in Crawley, there needs to be a variety of community facilities (such as places of worship etc.) and services to meet specific needs and encourage community cohesion.

**Likely evolution without the continued implementation of the Local Plan**

G9 Existing policies and the objectives of the Sustainable Communities Strategy do plan for the provision of community facilities, such as places of worship. Therefore, it is not envisaged that it would be a significant issue if it was not possible to update the Local Plan.

**What the Local Plan can and cannot do**

G10 The Local Plan can work to deliver a range of facilities and services that are accessible to all and to the correct standards.

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
G4	Percentage of people who believe people from different backgrounds get on well together in their local area – Place Survey/ LAA2	73.1%	West Sussex County – 80% All England – 81.62%	Crawley's figure is slightly lower than the England and West Sussex figures but there is a slight improvement made from the 06/07 figure of 70%  There is variance across the town with people from Northgate and Southgate more likely to agree with the statement while those from Broadfield and Bewbush were less likely to agree.	Former NI 1 2008/09 Place Survey
G5	Percentage of people who feel that they belong to their neighbourhood - Place Survey	53.5%	West Sussex County – 61.7% All England – 63.7%	People living in Tilgate are more likely to feel a sense of belonging to their neighbourhood while those living in Bewbush and Broadfield are more likely to have less attachment.	Former NI 2 200809 Place Survey

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

- G11 Crawley is relatively poorly served with 'early years' provision for under 5s with the lowest proportion of childminding places in the county and the second lowest proportion of places in early education and childcare.
- G12 There are 26 primary schools catering for the needs of Crawley's children aged between 4 and 11 years. Crawley also has six secondary schools: Hazelwick, Holy Trinity CE Secondary, Oriel High, Ifield Community College, St Wilfrid's and Thomas Bennett Community College, providing education to children aged between 11 and 16 and to A- Level standard for 16-18 year olds. The Central Sussex College has a large campus in the town centre and offers a wide range of professional qualifications and courses.
- G13 Educational attainment within the borough tends to be lower at all age groups when compared to the South East averages. In 2008/09 63% of boys and 69% of girls living in Crawley achieved five A\*-C grades at GCSE or equivalent. This compares with 66% and 74% respectively in the South East region as a whole. Similarly the attainment rates for those between the ages of 16 and 18 years are up to 7% lower than South East and UK averages, although this gap reduces significantly for those over the age of 19. Compared with the surrounding districts, Crawley has a higher percentage of residents with poor literacy and numeric skills.

#### **Likely evolution without the continued implementation of the Local Plan**

- G14 The provision of early years and educational facilities is the responsibility of County Council, and will be identified in our Infrastructure Plan where relevant. Further education is provided in the town by Crawley College, this is part of Chichester College Group.

#### **What the Local Plan can and cannot do**

- G15 The council has adopted a Community Infrastructure Levy charging schedule so contributions continue to be secured for the town's educational facilities. There is a need to ensure equality in access to education and to ensure that overall levels of education and skills match local employer's needs. Where necessary, the Local Plan can help support the education infrastructure improvements required to deliver high quality facilities, but that does not necessarily translate into driving up local educational attainment. The Plan review is considering the opportunities for supporting the council's initiatives to improve skills of the Crawley residents.

Indicator No.	Indicator	Crawley Data	South East	England	Data Sources
<b>G6</b>	Participation of 17 year-olds in education or training	3.8% Not in Education, Employment or Training in Crawley (2011)			CBC
<b>G7</b>	Percentage of people aged 16 – 64 with no qualifications.	2017: 5.9%* 2016: 2.0* 2015: 4.9%* 2014: 4.7% 2013: 9.2% 2008: 17.1%  *too small to estimate reliably	2017: 5.2% 2016: 5.5% 2015: 6.3% 2014: 5.6% 2013: 6.5%	2017: 7.6% 2016: 7.8% 2015: 8.4% 2014: 8.6% 2013: 9.2%	CBC

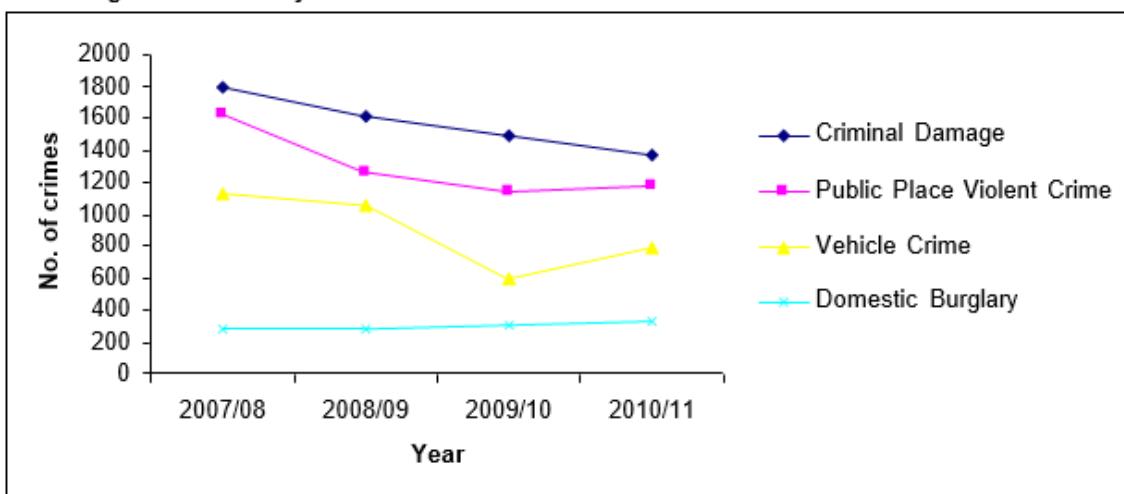
**Issue: There is a need to reduce crime and the perception of crime**

- G16 Recorded crime in the borough decreased by nearly 18% from 14,677 to 12,083 between 2005 and 2008, and an additional 22.7% between 2008 and 2013 to 9,342. Of the recorded crimes in 2012/13, 14.8% (1,385) occurred at Gatwick.

**Table G1: Crawley Crime incidence 2007-2013**

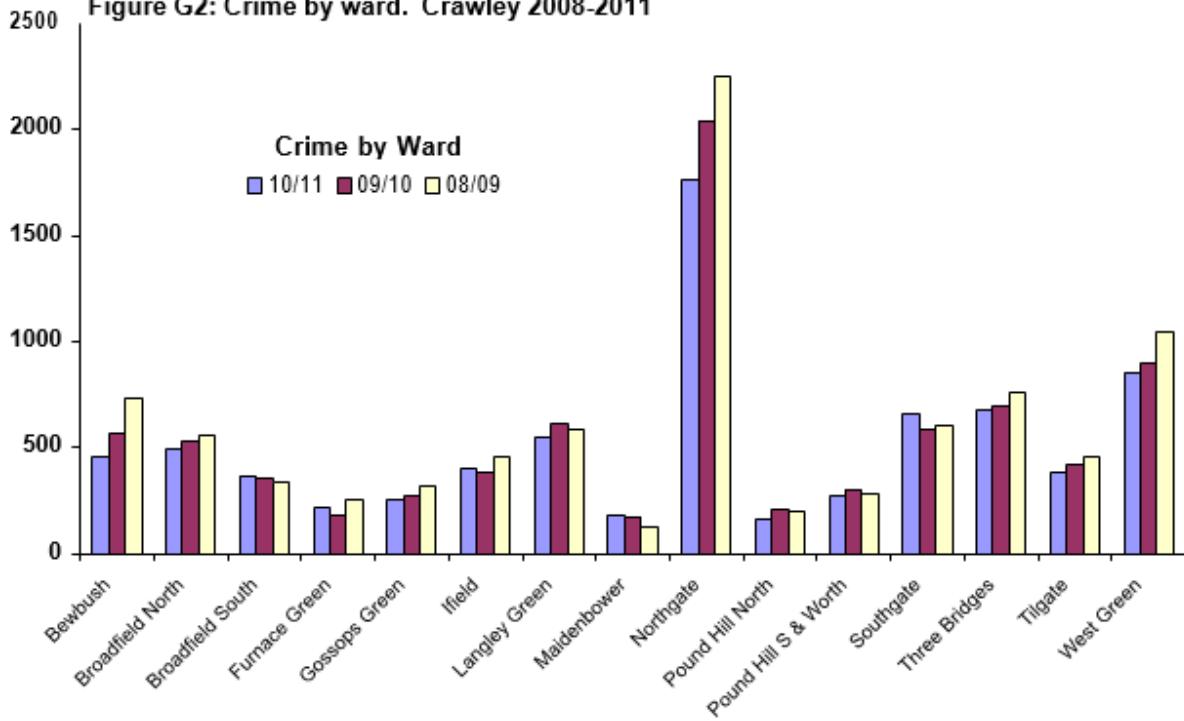
Crawley and Gatwick Airport	2007/ 2008	2008/ 2009	2009/ 2010	2010/ 2011	2011/ 2012	2012/ 2013	Actual difference over 3 years	Three year % change
Total Crime	12,083	11,155	10,035	9,410	9,659	9,342	- 68	- 0.7%
Domestic Burglary	276	283	307	326	263	307	- 19	- 6.2%
Vehicle Crime	1,128	1,059	591	787	754	1,024	+ 237	+ 23.1%
Criminal Damage	1,790	1,608	1,492	1,372	1,218	1,047	- 325	- 31%
Public Place Violent Crime	1,619	1,264	1,142	1,174	1,129	1,136	- 38	- 3.4%
Business Crime	4,310	4,234	3,895	2,172	2,239	1,989	-1,471	- 74%

**Figure G1: Crawley crime incidence 2008-2011**



- G17 Crime patterns and fear of crime vary across Crawley and have different impacts on quality of life and development. Much crime goes unreported, particularly that related to minor physical violence. Sexual assault and levels of domestic violence, although small in total, are much higher in the Crawley area compared to the rest of West Sussex. The economic and social cost of crime is high and vulnerability to crime varies for different people and in different places. A significant amount of crime, disorder and anti-social behaviour is drug and alcohol related. Anti-social behaviour is a source of much public anxiety and concern, although the fear of crime is generally disproportionate to actual incidence. Whilst, the crime rate within Crawley is falling the perception of crime as evidenced in the Place Survey results is generally high, especially the perception of safety after dark.
- G18 By ward, Northgate suffered more than twice the number of crimes than any other area with 1,760 offences or 23% of the total. Northgate ward comprises the town centre with its numerous pubs, clubs and bars, and includes the police station. Offences are often revealed at the police station, e.g. people in possession of drugs, and for recording purposes the station is shown as the place where the offence was committed. This can therefore give a false impression of the volume of crime in Northgate ward.

**Figure G2: Crime by ward. Crawley 2008-2011**



#### Likely evolution without the continued implementation of the Local Plan

G19 There are existing provisions in place relating to Secured by Design. However, national guidance requires local design policies to be set in an up-to-date Local Plan, therefore, without the continuation of the Local Plan it is likely that the council will have less control over design standards as the existing policies become more outdated, leading to a lack of consistency in relation to good design.

#### What the Local Plan can and cannot do

G20 The Local Plan can ensure that the principles of Secured by Design are followed in all new developments. This includes standards for fences, gates and alarms, as well as guidance on the layout and design of developments. However, direct action in actually policing and reducing crime is outside of the scope of the planning process.

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
<b>G8</b>	The percentage of Crawley's residents who would agree with the statement that Crawley is a safe place.	35%	N/A	The most recent survey results illustrate an increase in residents opinion up from 27% from the previous survey in 2005/06	CBC Resident's Survey 2008
<b>G9</b>	The percentage of people who feel (to a major extent) that the design of the built environment creates safe environments.	37%	N/A		CBC Resident's Survey 2008
<b>G10</b>	The percentage of people who feel (to a major extent) that well maintained environment creates	41%	N/A		CBC Resident's Survey 2008

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
	safe environments.				
<b>G11</b>	How safe or unsafe do you feel when outside in your local area: % people who feel very safe or fairly safe	After dark – 40.7% During Day - 86.2%	SE- After dark - 54% During Day 90.4%  England- After dark– 50.9% During Day 87.9%	People living in Bewbush and Broadfield will generally feel less safe.	Place Survey 2008
<b>G12</b>	Serious violet crime Rate (number per 1,000 population)	0.3 (2008/09)	West Sussex 0.3  All England Average 0.93	There has been a increase in the rate when comparing the first three quarters of 2008/09 to 2009/10 (0.19 increase to 0.55)	Former NI 15 Home Office – iQuanta No longer collected by Crawley Borough Council
<b>G13</b>	Serious acquisitive crime rate (number per 1,000 population)	14.56 (2008/09)	West Sussex 8  All England Average 18.83	There has been a decrease in the rate when comparing the first three quarters of 2008/09 to 2009/10 (11.45 decrease to 7.64)	Former NI 16 Home Office – iQuanta No longer collected by Crawley Borough Council
<b>G14</b>	Assault with injury crime rate (number per 1,000 population)	6.92 (2008/09)	West Sussex 4  All England Average 7.69	There has been a decrease in the rate when comparing the first three quarters of 2008/09 to 2009/10 (5.23 decrease to 5.02)	Former NI 20 Home Office – iQuanta No longer collected by Crawley Borough Council

### Issue: Ensuring better health and healthcare for Crawley

- G21 The health of town is generally good. For example, life expectancy at birth in Crawley is on average 80 years for men and 84 years for women, which is slightly higher than the national average (2008 data). There are however, wide variations between different wards - life expectancy at birth for males in Bewbush is 75.7 years compared to 82.7 years in Pound Hill North. The provision of healthcare facilities is addressed in the discussion under Topic F. There is a need for the council to continue to lead and work with others to protect and promote the health and wellbeing of the community through creating opportunities to participate in exercise and helping to provide sufficient healthcare provision to support the borough's continued growth.
- G22 Open space, sport and recreation provision in the town is shown through Crawley's Open Space, Sport and Recreation Study (2013) to be of generally good quality and quantity. However, the previous study had shown there was an undersupply of 4 badminton courts, 10 tennis courts and 112m<sup>2</sup> of swimming pools to meet the needs of

the existing population at the time of the previous study. This is not considered to be a significant issue due to the quality of the town's provision, notably K2 Crawley Leisure Centre which offers a broad range of facilities including an Olympic sized swimming pool and climbing wall. Crawley is currently undertaking a review of the Open Space, Sport and Recreation facilities. The new Open Space, Sport and Recreation Study includes community halls and indoor sports facilities which were not included in the 2013 study and it will provide an updated baseline position going forward.

- G23 Physical activity levels for the area are generally lower than the national picture although satisfaction with leisure facilities is very high. There are, however, local quality issues and in some areas the location of facilities does not match the local needs, so an element of refinement is now required to ensure the assets are fit for the life of the plan. This is an important issue for the borough for a second reason: A definitive list of protected sites as well as those that can be used for alternative uses will provide a strong policy to ensure Crawley has the right type and amount of open space, sports and recreation provision in the most accessible locations.

#### **Likely evolution without the continued implementation of the Local Plan**

- G24 The population of the borough is likely to continue to grow and age putting an increasing strain on healthcare provision. Existing disparities around the town are likely to be widened. Without intervention, the levels of sports and open space provision are likely to erode slightly and areas of the town experiencing the greatest levels of change may be underserved. By intervening now, the distribution and quality issues can be addressed to meet current and future need.

#### **What the Local Plan can and cannot do**

- G25 The quality of the environment has an important role to play in the health of the local population (and to a lesser extent those who work in the borough) in facilitating and encouraging exercise. The quality of community services, health and recreation facilities, contributes to the level of deprivation suffered in an area. By ensuring equality in access to these facilities, the council might be able to contribute to the improvement of the quality of life for residents and visitors. The Local Plan can influence strongly the location of provision, the demands on new development and future protection of provision. Ensuring that facilities are in accessible locations and of high quality goes some way to encouraging greater participation in sport.

Indicator No.	Indicator	Crawley Data	SE/England Data	Trend	Data Sources
<b>G15</b>	Self-reported measure of people's overall health and wellbeing	83.5% in good health or better	England Average – 81.4 South East - 83.6 WSSC – 82.5%	Crawley has a higher self-reported measure of people's overall health than England's average.	Census 2011
<b>G16</b>	All-age all- cause mortality rate	2008-09 Females 451 Males 540	England: 2008/09 Females 480 Males 669	Crawley saw a rise in female mortality from 382 in 2007/08 to 451 but a fall in the male mortality from 580 in 2007/08 to 540.	Former NI 120 (a-Females & b-Males)
<b>G17</b>	Healthy life expectancy at age 65 (years)	2011 Females 21.8 Males 18.8	South East 2011 Females 21.6 Males 19.0 England and	Crawley's data for health expectancy at 65 is similar to the national	2011 Census Office of National Statistics

<b>Indicator No.</b>	<b>Indicator</b>	<b>Crawley Data</b>	<b>SE/England Data</b>	<b>Trend</b>	<b>Data Sources</b>
			Wales 2011 Females 21.0 Males 18.4	average.	
<b>G18</b>	Adult Participation in Sport	2010-12 – 20.2% 2009-11 – 17.3% 2008-10 – 17.9% 2007-09 – 17.0% 2005/06 – 19.6%	Regional Average 2011-12 – 24.1% 2009-11 – 23.1% 2007-09 – 23.1% 2005/06 – 22.9% National Average – 2009-11 – 22.3% 2007-09 – 22.1% 2005/06 – 21.6%	This represents a slight increase in participation from the result of the first survey carried out in 2005/06 which was 19.6%. Crawley has the average participation rate for West Sussex, but lower than the Regional and National averages.	Former NI 8 Active People Survey by Sport England
<b>G19</b>	Percentage of residents satisfied with the authorities sports/leisure facilities	85%		Increase from 07/08 result of 68%	Place Survey 2008

## **Appendix D: Draft Consultation Local Plan Policies Options and Appraisal**

Each of the draft Regulation 18 consultation Local Plan policies and their options has been assessed against the Sustainability Objectives.

These have been set out in the following boxes structured in Local Plan Chapter order.

## Sustainable Development

Policy SD1: Presumption in Favour of Sustainable Development			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<b>Option 3: Adapt the Model Presumption in Favour of Sustainable Development Policy wording devised by PINs and include local issues identified through the Local Plan evidence base.</b> Option 3 has been chosen		
Option 1: Rely on the NPPF.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+? +? +? +? +? +? +? +? +?	
<b>Commentary</b> The positive influence from relying on the NPPF is questionable. Much of the justification for local designations is necessary through local evidence tested at examination. The greatest strength will come from being within an adopted and up-to-date Local Plan. Recent examples of Inspectors' decisions have indicated the Planning Inspectorate expect Local Planning Authorities to include a policy based on the NPPF presumption in favour of sustainable development, and have produced a 'model policy' to pursue this.			
Option 2: Use the Model Presumption in Favour of Sustainable Development Policy wording devised by PINs.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+? +? +? +? +? +? +? +? +?	
<b>Commentary</b> Recent examples of Inspectors' decisions have indicated the Planning Inspectorate expect Local Planning Authorities to include a policy based on the NPPF presumption in favour of sustainable development, and have produced a 'model policy' to pursue this. The model policy is based solely on the NPPF wording, and it is considered that the positive influence of this is limited, as it does not take into account the Crawley-specific issues which have been identified through evidence gathering.			

Policy SD2: Enabling Healthy Lifestyles and Wellbeing			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<b>Option 3: To Provide a Strategic Overarching Policy relating to Wellbeing and Healthy Lifestyles and require a Health Impact Assessment</b> Option 3 has been chosen		

Option 1: To Provide a Strategic Overarching Policy relating to Wellbeing and Healthy Lifestyles	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+? 0 0 0 0 +? +? +? +	
<b>Commentary</b>			
Option 2: To rely on the Plan policies and NPPF to deliver healthy lifestyles and well-being objectives	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	? 0 0 0 0 ? ? ? ?	
<b>Commentary</b>			
Option 3: To Provide a Strategic Overarching Policy relating to Wellbeing and Healthy Lifestyles and require developers to submit evidence to support this through the introduction of a Health Impact Assessment.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+? 0 0 0 0 + + + +	
<b>Commentary</b>			

## Character & Design

<b>Policy CD1: Neighbourhood Principle</b>			
<b>Policy Options</b>	<b>SA Objective with Significant Effect</b>	<b>Positive or Negative Impact</b>	<b>Mitigation of Negative Impacts</b>
Chosen Option	<b>Option 1: Develop a local plan policy to protect and enhance the character of Crawley's neighbourhood structure.</b> Option 1 has been chosen because it is considered that by applying a holistic approach to maintaining the character of the neighbourhoods, this option best enables the protection of the key individual features that contribute to the overall function, character and sustainability of the neighbourhood principle.		
Option 1: Develop a local plan policy to protect and enhance the character of Crawley's neighbourhood structure.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	++	Mitigation not required as no negative impacts identified.
<b>Commentary:</b> The Option 1 approach would be to develop a local plan policy to protect and enhance the character of Crawley's neighbourhood structure. Crawley's unique character has been shaped by the neighbourhood principle, and the strong support for the principle expressed by respondents to the local plan Issues and Options consultation illustrates the value in which it is held locally. The benefits of the neighbourhood principle do not however relate solely to character, and in providing accessible housing, employment, infrastructure, facilities and services to support the day-to-day needs of residents, the neighbourhood principle reflects the key indicators of sustainable development. In this regard, Option 1 scores strongly against each of the sustainability indicators, and is brought forward as the preferred approach.			
Option 2: Rely on existing national guidance and other local plan policies to ensure that development respects Crawley's neighbourhood character.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+ + - + -? -? ? - ?	
<b>Commentary:</b> The Option 2 approach would rely on existing national guidance and other local plan policies to ensure that development respects Crawley's neighbourhood character. It is feasible that reliance on existing national guidance and emerging local plan policy could deliver the key components that contribute to the character and function of Crawley's neighbourhoods. However, a key concern is that the approach fails to view the neighbourhood, and the inter-linked components which contribute to its character, environment, and overall sustainability, in a holistic manner. This potentially results in a failure to consider the impact of development on the overall function of the neighbourhood, and could detract			

Policy CD2: Making Successful Places: Principles of Good Urban Design			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p><b>Option 1: Create a new policy within the Local Plan that sets out eleven principles of good design that applicants should adhere to.</b></p> <p>Option 1 has been chosen to enable planning applications to be assessed against the seven principles of good urban design to protect and enhance the built environment (SA objective 3) and key landscape features (SA objective 6). The principles should also encourage modal shift to more sustainable modes of transport. And in particular cycling and walking, by creating a safer, more legible and interesting environment, using direct routes to places where people want to go (SA objective 7) and socially sustainable communities (SA objective 9). Option 1 could reduce development potential by highlighting the negative impacts of over-development, or development that would not protect or enhance the borough (SA objectives 4, 5 and 7). The opposite could, however, also apply as a better quality environment may attract investment into the town.</p>		
Option 1: Create a new policy within the Local Plan that sets out seven principles of good design that applicants should adhere to.	<ol style="list-style-type: none"> <li>1. Minimise climate change</li> <li>2. Adapt to climate change</li> <li>3. Protect/enhance built environment</li> <li>4. Decent, affordable homes</li> <li>5. Maintain/support employment</li> <li>6. Conserve/enhance biodiversity and landscape</li> <li>7. Promote sustainable journeys</li> <li>8. Provide sufficient infrastructure</li> <li>9. Promote sustainable communities and Encourage active lifestyles</li> </ol>	+ + ++ + + ++ ++ + ++ 	Mitigation not required as no negative impacts identified.
<p><b>Commentary</b></p> <p>Option 1 proposes a local policy within the Local Plan which should pursue the high quality design of all new developments. Importantly, this policy will assist in both protecting and enhancing the built environment (SA Objective 3), and conserving the existing landscape (SA Objective 6). Good Urban Design is sustainable design. Urban form and structure have a major influence on climate change. There is a crucial relationship between form and space, buildings, energy, movement patterns, land take and location.</p> <p>There might be a possibility that there will be less development within the borough in the short to medium term. Although local policy, actively encourages sustainable intensification of land and higher residential densities (SA Objective 1 &amp; 2), such objectives depend on a higher quality approach to both design and planning for all new development. And a more detailed, bespoke site specific design response. This is something that may be difficult for smaller and more traditional developers to first understand and adequately resource for. However this slowdown, if it occurs, should be temporary, because attractive and well-designed development should create opportunities for additional dwellings, complement and enhance the character of local neighbourhoods and encourage further investment into the town.</p>			
Option 2: Delete the existing policy and rely on the NPPF.	<ol style="list-style-type: none"> <li>1. Minimise climate change</li> <li>2. Adapt to climate change</li> <li>3. Protect/enhance built environment</li> <li>4. Decent, affordable homes</li> <li>5. Maintain/support employment</li> <li>6. Conserve/enhance biodiversity and landscape</li> <li>7. Promote sustainable journeys</li> <li>8. Provide sufficient infrastructure</li> <li>9. Promote sustainable communities and Encourage active lifestyles</li> </ol>	+ + + + + + + + +	

<b>Commentary</b>
High quality design is a specific requirement of the NPPF. The presumption in favour of sustainable development would allow development where the harm would not significantly and demonstrably outweigh the benefits. The quality of development may be reduced if the need to adhere to specific principles of good urban design were to be removed.

<b>Policy CD3: Local Character and Design of New Development</b>			
<b>Policy Options</b>	<b>SA Objective with Significant Effect</b>	<b>Positive or Negative Impact</b>	<b>Mitigation of Negative Impacts</b>
Chosen Option	<b>Option 1: Create a new policy within the Local Plan that sets out four key principles related to existing local character and design that applicants should adhere to.</b> Option 1 has been chosen to enable planning applications to be assessed against four key principles related to existing local character and design that aim to ensure that new development proposals are grounded in an understanding and evaluation of each neighbourhood's defining characteristics (SA Objective 3, 6). By their very nature, both foundational and fundamental to new development proposals, such evaluation will encourage a 'bottom-up', area specific, bespoke and design-led approach (SA Objective 9).		
Option 1: Create a new policy within the Local Plan that sets out four key principles related to existing local character and design that applicants should adhere to.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 + ++ + 0 + 0 0 ++	
<b>Commentary</b> Sustainable design and planning is not necessarily about changing the way places look but about making places work better, while still allowing for more sustainable and effective use of land. However Increased density, land use intensification and infill development projects, as well as possible urban extensions can easily introduce unsuitable or insensitive new landscape and urban character and built form near, alongside and within established neighbourhoods, Tailored design and character assessments, as well as development design frameworks, can guide and aid in the retention, and protection of distinctive places. As no one neighbourhood nor individual site has the exact same character the respective outputs of individual assessments will vary and be tailored to reflect prevailing design character, form, settling and context.			
Option 2: Delete the existing policy and rely on the NPPF.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 + + 0 0 - 0 - -	
<b>Commentary</b> The NPPF directs and places a particular emphasis that Planning and Design policies and decisions should be grounded in an understanding and evaluation of each area's defining characteristics. It also advises that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an			

area and the way it functions. However, the NPPF also emphasises how new development should also take into account any local design standards and style guides in plans or supplementary planning documents. Without specific principles in place guiding and informing applicants the NPPF presumption in favour of effective use of land and the need for new housing would allow for potentially harmful forms of new development. Or at the very least the quality of development may be reduced as it would not be possible to significantly demonstrably how existing character, form and design outweigh other presumptions.

Policy CD4a: Effective Use of Land: Movement, Sustainability and Urban Form			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p><b>Option 1: Develop a local plan policy to help ensure that while formulating plans for the effective use of land, attention and focus is concentrated on movement, sustainability and urban form in the first instance,</b></p> <p>With the NPPF focus on effective use of land, option 1 has been chosen to direct how new development form should be approached. That in the first instance it is to be assessed against the five primary elements of development form and their 8 interchangeable aspects (SA Objective 3, 6). Also to direct high density development to appropriate locations such as the town centre and other areas that are well served by high frequency, reliable public transport.</p> <p>Public opinion can be biased by negative perceptions in relation to intensification of land use and higher densities. Enabling the planning process to better guide and direct how Crawley makes more effective use of its land, will encourage existing communities, involve existing residents in the changing process and help dispel concerns. (SA Objective 9).</p>		
Option 1: Develop a local plan policy to help ensure that while formulating plans for the effective use of land, attention and focus is concentrated on movement, sustainability and Urban Form in the first instance,	<ol style="list-style-type: none"> <li>Minimise climate change</li> <li>Adapt to climate change</li> <li>Protect/enhance built environment</li> <li>Decent, affordable homes</li> <li>Maintain/support employment</li> <li>Conserve/enhance biodiversity and landscape</li> <li>Promote sustainable journeys</li> <li>Provide sufficient infrastructure</li> <li>Promote sustainable communities and Encourage active lifestyles</li> </ol>	++ ++ + 0 + + ++ ++ ++ ++ 	
<p><b>Commentary</b></p> <p>There are many cases nationally where higher density designs have produced a poor quality environment. Poor understanding and application of urban design, setting, services and infrastructural impact, To the detriment of existing character and neighbourhood. And creating conflicts in specific areas such as vehicular traffic capacity and car parking. Both for original residents and new arrivals.</p> <p>Whether strategic or small in size, all new development needs to consider its place and impact within the wider context.</p> <p>This is particularly important, with regard to movement patterns, in establishing walkable neighbourhoods and ensuring new development can optimise and promote modal shift to sustainable alternatives. Urban form influences users' activity and movement within, through and around a place. As a result it has a major influence on climate change. Almost 30 per cent of carbon emissions come from buildings and a further 25 per cent from transport (SA Objective 1). Government policy makes it clear that higher residential densities, public transport and sustainability are all interconnected and that they rely upon one another in order to achieve an increase in the supply of residential units.</p>			
Option 2: Delete the existing policy and rely on the NPPF and respond to new development proposals as they come forward on	<ol style="list-style-type: none"> <li>Minimise climate change</li> <li>Adapt to climate change</li> <li>Protect/enhance built environment</li> <li>Decent, affordable homes</li> <li>Maintain/support employment</li> <li>Conserve/enhance biodiversity and landscape</li> </ol>	+? 0? - 0 0 -	

an ad hoc basis.	7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	-- - ?	
<b>Commentary</b> As mentioned previously, without new development and places in the first instance being planned, arranged and designed properly, wider opportunities will very likely be missed. Although the NPPF emphasises that higher residential densities, public transport and sustainability are all interconnected and that they rely upon one another in order to achieve an increase in the supply of residential units, it stops short of specifics. Instead it places the onus on local authorities to translate, direct and define how such objectives can apply on the ground. Through bespoke local policy, and locally applicable character assessment and detailed SPG guidance. Relying on individual new development which come forward, to adequately define, consider and respond the wider context is unrealistic. And even harder to manage without suitable policy and local assessment in place first.			

<b>Policy CD4b: Effective Use of Land: Layout, Scale, Appearance and Public Realm</b>				
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts	
Chosen Option	<b>Option 1: A policy will be created in the Local Plan that will not grant planning permission which unduly affects the development potential of the adjoining land. Which is not appropriate to and respectful of its context or jeopardises the proper planning of the area.</b> Option 1 has been chosen since the incremental development of the land could preclude the potential phasing of a more comprehensive development that would reduce the opportunity to maximise the number of homes and employment space (SA Objective 4 & 5) within the borough. Such policy will help manage and guide new development so that it is appropriate to and respectful of its context (SA Objective 9), although this does not mean that appearance, scale, density, height, massing and form need to be the same as the surrounding area.			
Option 1: A policy will be created in the Local Plan that will not grant planning permission which unduly affects the development potential of the adjoining land or jeopardises the proper planning of the area.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+ + + ++ ++ + + + +	Mitigation not required as no negative impacts identified.	
<b>Commentary</b> Land suitable for development is limited within the borough and should not be prevented from coming forward or limited in its potential by proposals on the adjoining land. The policy should reduce the amount of countryside or land at risk of flooding required for development and make better use of infrastructure, reducing some of the impact on climate change (SA objectives 1 and 7). Land would be developed more efficiently increasing the amount of development for housing or employment, for example, which would have a significant positive impact (SA objectives 4, 5 and 8). In order to secure minimal densities and more sustainable, higher density across the town, new development must be assessed against the five primary urban form elements; Layout, Scale, Appearance, public Realm and movement (And their 8 interchangeable aspects). And density is just one aspect of layout. The others, Urban Structure, Urban Grain and mix and are just as important. Building height, block size and building typology all affect the character of an area and the perception of density. Yet these are vital design aspects frequently overlooked by applicants in their planning applications.				

Option 2: Delete policy and rely on the NPPF.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	- + + -? -? + - -? +	
<b>Commentary</b>			
Land suitable for development is limited within the borough and could be prevented from coming forward or limited in its potential by proposals on adjoining land. The less efficient use of land Crawley makes within existing urban locations could increase the amount of countryside or land at risk of flooding required for development. And make less use of existing infrastructure and increase the impact of climate change (SA objectives 1 and 7). Land would not be developed efficiently decreasing the amount of development for housing or employment, for example (SA objectives 4, 5 and 8).			

<b>Policy CD5: Local Design Standards</b>				
<b>Policy Options</b>	<b>SA Objective with Significant Effect</b>	<b>Positive or Negative Impact</b>	<b>Mitigation of Negative Impacts</b>	
Chosen Option			<b>Option 2: Create a new policy within the Local Plan that sets out how Area Wide Character and Design Assessments must be prepared for all substantial new development. Following and guided by this work, relevant urban design concepts and plans will be required to provide indicative, but flexible guidance and vision for future development form.</b>  Option 2 has been chosen because it is considered that new proposals have to build upon existing strengths and patterns, the analysis and understanding of which can inform planning and design responses. Along with further guidance set out in SPD's to support development proposals, this policy also outlines requirements for bespoke local character and local design grounded urban design framework and master plans and development briefs. (SA objectives 3, 4, 5, 6 & 9).	
Option 1: Create a new policy within the Local Plan that sets out how Area Wide Character and Design Assessments must be prepared for all substantial new development.			<b>1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles</b>	
			<b>Commentary</b>	
Option 2: Create a new policy within the Local Plan that sets out how Area Wide Character and Design Assessments must be prepared for all substantial new development. Following and guided by this work, relevant urban design concepts and plans will be			1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	

required to provide indicative, but flexible guidance and vision for future development form.	<p><b>Commentary</b></p> <p>The inclusion of proper context analysis and springing from any outcomes and directions, bespoke planning and flexible urban design guidance, is essential, in the drive to achieve effective use of land. While also enabling it to come forward in a high quality and sustainable form, and gain local neighbourhood support. Even within distinct neighbourhoods, a number of contrasting urban forms and character areas can occur. It may be convenient but it is not appropriate to simply apply common landscape and urban design criteria across the board. The inclusion of this policy should result in new development that reinforces local character and strengths and creates places with a real sense of identity. Where local authority resources are limited, consultants for a landowner or developer may work with the local authority to produce such work jointly (SA objectives 3, 4, 5, 9).</p> <p>For the intensification of land use to be successful far more consideration, evidence and up front planning and design ground work is required. To find the balance between what may be conflicting objectives which influence the development process; Policy, feasibility /viability, community, site context and development implementation approach</p>		
Option 3: Delete policy and rely on the NPPF.	<ol style="list-style-type: none"> <li>1. Minimise climate change</li> <li>2. Adapt to climate change</li> <li>3. Protect/enhance built environment</li> <li>4. Decent, affordable homes</li> <li>5. Maintain/support employment</li> <li>6. Conserve/enhance biodiversity and landscape</li> <li>7. Promote sustainable journeys</li> <li>8. Provide sufficient infrastructure</li> <li>9. Promote sustainable communities and Encourage active lifestyles</li> </ol>	0 + + 0 0 ) 0 0 +	
	<p><b>Commentary</b></p> <p>High quality design is a specific requirement of the NPPF. The presumption in favour of sustainable development would allow development where the harm would not significantly and demonstrably outweigh the benefits. The quality of development may be reduced if the need to adhere to specific principles of good urban design were to be removed.</p>		

<b>Policy CD6: Normal Requirements of All New Development</b>			
<b>Policy Options</b>	<b>SA Objective with Significant Effect</b>	<b>Positive or Negative Impact</b>	<b>Mitigation of Negative Impacts</b>
Chosen Option	<p><b>Option 1: Create a new policy within the Local Plan that sets out seven requirements that applicants should adhere to.</b></p> <p>Option 1 has been chosen to enable planning applications to be assessed against seven factors that contribute to the creation of high quality development, landscape and open space (SA objective 3 &amp; 6) . This policy requires new development to provide or retain a good standard of amenity for all existing and future users/ occupants of land and buildings and not cause unreasonable harm to the amenity of the surrounding area (SA objective 4 &amp; 9). And establishes a presumption in favour of retaining and reusing existing buildings, structures and landscape features. (SA objective 1 &amp;2).</p> <p>Option 1 could reduce development potential by highlighting the negative impacts of over-development or development that would not protect or enhance the borough and /or be of poor amenity (SA objectives 3, 4, 5, 6 and 9).</p>		
Option 1: Create a new policy within the Local Plan that sets out seven requirements that applicants should adhere to.	<ol style="list-style-type: none"> <li>1. Minimise climate change</li> <li>2. Adapt to climate change</li> <li>3. Protect/enhance built environment</li> <li>4. Decent, affordable homes</li> <li>5. Maintain/support employment</li> <li>6. Conserve/enhance biodiversity and landscape</li> <li>7. Promote sustainable journeys</li> <li>8. Provide sufficient infrastructure</li> </ol>	++ ++ ++ + +? + ++ +	Mitigation not required as no negative impacts identified.

	9. Promote sustainable communities and Encourage active lifestyles	+	
<b>Commentary</b>			
This option is intended to be judged against all planning applications, to ensure that new developments protect and/or enhance the built environment (SA Objective 3) and conserve the landscape (SA Objective 6). The principles of this policy should also maintain and even improve tree retention, which will assist in minimising climate change (SA Objective 1). In addition, the policies are intended to encourage and to promote sustainable communities (SA Objective 9). However, as with the previous policy, the development potential of Crawley could reduce with more restrictive policies (SA Objective 5) but creative design could identify opportunities for additional development and encourage further investment via an improvement to the built environment.			
Option 2: Delete policy and rely on NPPF.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+? + +? +? + - + +? + +	

Policy CD7: Aerodrome Safeguarding			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<b>Option 1:</b> Option 1 has been chosen		
Option 1: Add a policy on aerodrome safeguarding	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 0 + + + 0 0 0 +	
	<b>Commentary</b> Aerodrome Safeguarding and the requirements to consult are set out under Planning Circular 01/2003. However, recently published evidence (Lichfield in liaison with General Aviation Awareness Council, July 2018) is suggesting that, in general terms, the guidance in Planning Circular 01/2003 is not being applied consistently by local planning authorities, and suggests that for clarity, local plans with an officially safeguarded aerodrome should include a policy. Inclusion of a		

	dedicated policy can help address this to raise awareness of the requirements of Aerodrome Safeguarding and to help ensure the safe operation of Gatwick Airport.		
Option 2: Don't include a policy on aerodrome safeguarding and continue to rely on Planning Circular 01/2003	<ol style="list-style-type: none"> <li>1. Minimise climate change</li> <li>2. Adapt to climate change</li> <li>3. Protect/enhance built environment</li> <li>4. Decent, affordable homes</li> <li>5. Maintain/support employment</li> <li>6. Conserve/enhance biodiversity and landscape</li> <li>7. Promote sustainable journeys</li> <li>8. Provide sufficient infrastructure</li> <li>9. Promote sustainable communities and Encourage active lifestyles</li> </ol>		
<b>Commentary</b> Option 2: Don't include a policy on aerodrome safeguarding and continue to rely on Planning Circular 01/2003. This would not address the issues necessitating a policy that are discussed under Option 1, and Option 2 is not supported.			

<b>Policy CD8: Advertisements</b>			
<b>Policy Options</b>	<b>SA Objective with Significant Effect</b>	<b>Positive or Negative Impact</b>	<b>Mitigation of Negative Impacts</b>
Chosen Option	<b>Option 1: Include a policy relating to the treatment of applications for express advertisement consent, informed by national guidance.</b> This option is preferred on the basis of its stronger benefits in terms of protection of the amenity of the built and natural environment, public safety, and the maintenance of a strong employment base.		
Option 1: Include a policy relating to the treatment of applications for express advertisement consent, informed by national guidance.	<ol style="list-style-type: none"> <li>1. Minimise climate change</li> <li>2. Adapt to climate change</li> <li>3. Protect/enhance built environment</li> <li>4. Decent, affordable homes</li> <li>5. Maintain/support employment</li> <li>6. Conserve/enhance biodiversity and landscape</li> <li>7. Promote sustainable journeys</li> <li>8. Provide sufficient infrastructure</li> <li>9. Promote sustainable communities and Encourage active lifestyles</li> </ol>	0 0 ++ 0 + ++ 0 0 +	Mitigation not required as no negative impacts identified.
<b>Commentary</b> Applications for advertisement consent should be determined in accordance with amenity and public safety, which relate to Sustainability Objectives 1, 6 and 9. Effective and clear regulation of advertisements also has the potential to support objective 5, through businesses being able to judge more easily what is and is not likely to be acceptable.			
Option 2: Do not include a specific advertisements policy, and leave applications to be determined in accordance with other policies together with national guidance.	<ol style="list-style-type: none"> <li>1. Minimise climate change</li> <li>2. Adapt to climate change</li> <li>3. Protect/enhance built environment</li> <li>4. Decent, affordable homes</li> <li>5. Maintain/support employment</li> <li>6. Conserve/enhance biodiversity and landscape</li> <li>7. Promote sustainable journeys</li> <li>8. Provide sufficient infrastructure</li> <li>9. Promote sustainable communities and Encourage active lifestyles</li> </ol>	0 0 + 0 +? + 0 0 +?	
<b>Commentary</b> This option is not considered to have any negative impacts, owing to the availability of national guidance on adverts and more general design guidance in the Local Plan and Supplementary Planning Documents. However, in this scenario the benefits in respect of amenity, public safety and support for businesses are considered to be smaller and/or less certain than in the case of option 1.			

Policy CD9: Crossovers			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<b>Option 1: A policy to allow crossovers.</b> Although planning permission is not required to use front gardens for parking, where access to that area is from a classified road over a pavement or verge then planning permission is required. It is acknowledged that facilitating the provision of car parking could help encourage car ownership and therefore have a negative impact on SA objective 7. However, having a policy helps to minimise the impact on verges and the street scene by only allowing crossovers where the local amenity are not adversely affected.		
Option 1: A policy to allow crossovers.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	? - ? 0 0 + - 0 0	Mitigation for both SA Objective 2 and 6 will be through other policies within the Local Plan (notably in the Character and Design; Landscape Character and Landscaping; and Green Infrastructure chapters). In addition, Policy CD9 states that crossovers will only be permitted where the amenity of the street scene is not adversely affected.
<b>Commentary</b> As a result of its development as a new town, parking provision within the curtilages of houses in the older new town areas is limited which leads to significant levels of on-street parking. This can cause highway safety issues and could be considered unsightly. There may also be issues relating to surface water run off by the removal of permeable areas. Although, taken as a whole, the policy could be considered to have a negative impact on sustainability objectives, it does ensure that the impact on the street scene is more fully considered rather than relying on general design policies.			
Option 2: Rely on general design policies	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	? - ? 0 0 - - 0 0	
<b>Commentary</b> A reliance on a general policy could mean that there is not such a specific focus on the impact on the amenity of the street scene which could lead to the loss of more verges or landscaped areas.			

Policy CD10: Inclusive Design			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<b>Option 1:</b> Option 1 has been chosen		
Option 1: To develop a separate policy requiring accessibility standards for all new buildings	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 0 +? ++ +? 0 +? / ++	Policy to include exceptions for where flexibility to be allowed.
<b>Commentary</b> <p>By providing a clear separate policy, the expectations of the council in relation to accessibility targets is clear from the outset. The requirement for it to apply to all new dwellings and all new buildings levels the starting position, and reflects the evidence of the council in relation to the need for accessible buildings to encourage healthy lifestyles and meet the needs of the borough's resident and working population.</p> <p>The requirement for accessibility measures may incur costs associated with design and additional space requirements. However, this should be considered as part of the Plan's viability assessment and once established as a policy would be reflected in land prices. Measures to address accessibility and adaptability are better considered at the earliest stage of preparing proposals, layout and design.</p> <p>The adaption of existing and historic buildings may have a potential harmful effect. However, with a clear policy requirement, this should be addressed early on in the design stages.</p> <p>There may be circumstances where it is not possible to meet the policy requirements. This can be managed by including exceptions in the policy to allow flexibility in such circumstances.</p> <p>It is not considered this policy will impact on climate change mitigation or adaptation. There is likely to be a neutral impact on infrastructure. However, there could be benefits to promoting sustainable journeys as people become more able to access buildings.</p>			
Option 2: To retain the national accessibility standards for all new dwellings in the space standards policy	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 0 +? + / 0 0 / +	
<b>Commentary</b> <p>Whilst the potential sustainability benefits of this approach remain positive, the requirement for all new dwellings to meet the accessibility and adaptability standards has been largely unnoticed when in the existing internal space standards policy. The benefit of including it there should be that it is considered at the same time as the design and layout of a scheme. However, in practice it is missed until matters such as unit sizes and layout have been set and it is much more costly and complex to meet these requirements in retrospect.</p>			
Option 3: To require a percentage of new	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built	0 0 /	

buildings to meet accessibility standards	environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+? +? 0 0 0 +?	
<b>Commentary</b>			
Option 4: To require a percentage of new dwellings to meet accessibility standards	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 0 / +? / 0 0 0 +?	
<b>Commentary</b>			
Option 5: To allow the market to decide what accessibility standards to meet above the minimum Building Regulations standard.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 0 / - - 0 0 0 --	
<b>Commentary</b>			
This would not change the position from the existing situation, and would not meet the needs established by the council's evidence. Therefore, it would not address the requirements and expectations of the NPPF adequately.			

Policy CD11: Standards for All New Dwellings (including conversions)			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<b>Option 4: To include standards for internal space within a Local Plan Policy and require adequate and usable outdoor space.</b> Option 4 was chosen to provide greater levels of certainty for the development industry and to ensure the homes built within Crawley offer the greatest quality of life standards available within conformity with national policy.		
Option 1: To include standards for external and internal space within a Local Plan Policy.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+ + ++ ++ 0 + 0 0 + +	
<b>Commentary</b> The inclusion of external and internal space standards in the Local Plan policy allows for greater level of consistency of application of policy. Adequate outdoor space allows for sufficient outdoor drying space, reducing pressures on electrical usage, and increases natural surface water infiltration, evaporation or harvesting, therefore reducing runoff. There is also the potential to conserve and enhance biodiversity and landscape when these are taken into account during the design and layout of a development scheme. Suitable homes with sufficient space and the potential for adaptation are likely to be more sustainable over the life of the dwelling. Minimising and adapting to climate change (Objectives 1, 2 and 3). The policy ensures the Local Plan has a significant positive impact on Objective 3, and on the provision of decent, affordable homes. Good layout and space standards promotes sustainable communities and encourages active lifestyles (Objectives 9 and 10) by ensuring amenity between neighbouring properties are protected; allows for children to have access to adequate outdoor space for safe, exercise and outdoor play; encourages hobbies such as gardening and home-grown food opportunities. The policy is not considered to have an impact on Objectives 5, 7 or 8.			
Option 2: To include a Policy linking to external and internal space standards within supplementary planning guidance.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+? +? +? +? 0 +? 0 0 ?	
<b>Commentary</b> With the reliance of guidance in SPD rather than the Local Plan it is considered the consistency of implementation of the standards may be reduced leading to greater uncertainty of delivery of the Sustainability Objectives.			
Option 3: To rely on the Policy requirements in NPPF and general design standard policies (i.e. CH2 and CH3) and consider applications on a case by case basis.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment	0 0 +? +? 0	

	6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 0 0 0	
<b>Commentary</b>			
Option 4: To include standards for internal space within a Local Plan Policy and require adequate and usable external space, linking with further guidance set out in SPD to support development proposals.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+? +? + + 0 +? 0 0 +	Mitigation not required as no negative impacts identified.
<b>Commentary</b>			
<p>The inclusion of internal space standards in the Local Plan policy allows for greater level of consistency of application of policy. Suitable homes with sufficient space and the potential for adaptation are likely to be more sustainable over the life of the dwelling (Objectives 4). The policy ensures the Local Plan has a positive impact on the provision of decent, affordable homes and, through the application of good design principles, can support the protection and enhancement of the built environment (Objective 3). Good layout and space standards promotes sustainable communities (Objectives 9). Requiring adequate and usable external space will potentially ensure benefits for climate change, as well as for biodiversity and landscape, and encourage active lifestyles (Objectives 1, 2, 6 and 10). Although this approach will offer less certainty of delivery than external standards set out in Policy it will allow for greater flexibility for schemes to be considered on a site-by-site basis.</p> <p>The policy is not considered to have an impact on Objectives 5, 7 or 8.</p>			

## Landscape and Landscape Character

Policy LC1: Structural Landscaping			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<b>Option 1: Create a new policy within the Local Plan that identifies areas of structural landscaping to ensure that these areas are both protected and/or enhanced.</b> <p>Option 1 was chosen because it is clear that Option 1 is the more sustainable option since the clear identification of important structural landscaping features should ensure both the protection and/or enhancement of the landscape/built environment, (SA Objective 3 &amp; 6) and moreover, minimise climate change (SA Objective 1 &amp; 2). Importantly, without this policy (Option 2), then there might be insufficient protection to stop the incremental development of land that could damage such important features.</p>		
Option 1: Create a new policy within the Local Plan that identifies areas of structural landscaping to ensure that these areas are both protected and/or enhanced.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity	+ + + + + ++	Mitigation not required as no negative impacts identified.

	and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+	
<b>Commentary</b>			
Option 4: Delete policy and rely on NPPF.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	-	
<b>Commentary</b>			

An alternative approach would be to not identify larger areas of greenery that are important to the character, appearance and legibility of the borough. This would potentially allow the ad-hoc and incremental erosion of these features. If specific areas where improvements to existing structural landscaping or new areas were not identified, the potential to enhance the quality of the built environment and key landscape features would be reduced.

Policy LC2: Important and Valued Views			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<b>Option 1: Create a new policy within the Local Plan which identifies a number of important views, and endeavours to protect and/or enhance those views through the restriction of development that would adversely affect such views.</b> Option 1 has been chosen, since it is believed that not managing the important views (Option 2) could lead to incremental development that could erode the important views fundamentally (SA Objective 3 and 6). In addition, soft landscaping can play a large part in minimising climate change (SA Objective 1), but its potential development could hinder this. Although Option 1 may lead to the restriction of development potential (SA Objective 4 and 5), the other environmental benefits of the preferred policy would appear to outweigh such a restriction.		
Option 1: Create a new policy within the Local Plan which identifies a number of important views, and endeavours to protect and/or enhance those views through the restriction of development that would adversely affect such views.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys	+ + ++ / / ++ +	Mitigation not required as no negative impacts identified.

	8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+	
<b>Commentary</b>			
There are views in the borough that are worthy of protection and enhancement. A number of views include significant tree cover or the potential for the view to be enhanced by additional trees, which could reduce the impact on the climate and help the area adapt to the effects of climate change (SA Objective 1 and 2). This proposed policy option would protect and enhance the built environment and key landscape features, and moreover, could have a significant positive impact on sustainability (SA objectives 3 and 6). This option could have a negative impact on development potential (SA objectives 4 and 5), but an attractive environment can attract further investment and create an attractive place in which to live.			
Option 2: Delete policy and rely on the NPPF.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	- - - + + - + + +	

<b>Policy LC3: Tree and Landscape Character Planting</b>			
<b>Policy Options</b>	<b>SA Objective with Significant Effect</b>	<b>Positive or Negative Impact</b>	<b>Mitigation of Negative Impacts</b>
Chosen Option	<b>Option 2: Split the existing policy into two policies one requiring additional planting of trees and soft landscapes to mitigate the visual impact of new development and a second to requiring additional planting and compensating for loss of trees.</b> <b>Commentary:</b> Option 2 has been chosen as the additional ability to promote soft landscaping as well as tree planting would have a positive impact on SA objectives 1,2,3 and 6, and some positive impact on 7 and 9 by enhancing the visual attractiveness of the environment and encouraging mobility through environments that provide more sustainable benefits. There is a neutral impact on SA objectives 4, 5 and 8 although it is mentionable the effect a positive natural environment has on wellbeing by living and or working in a well-designed environment that incorporates the benefits of nature.		
Option 1: A policy will be created in the Local Plan requiring additional planting to mitigate the visual impact of new development or the loss of existing trees.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	++ ++ ++ / / ++ + /	Mitigation not required as no negative impacts identified.
<b>Commentary</b>			
Option 1 was the original policy in the Local Plan 2014-2030. It had been chosen as additional or replacement tree planting would have a very positive impact on SA objectives 1, 2, 3 and 6, and some positive impact in relation to objectives 7 and 9.			

	There would be a neutral impact on the provision in respect of objectives 4, 5 and 8 although a more attractive environment could assist in attracting investment.		
Option 2: Split the existing policy into two policies one requiring additional planting of trees and soft landscapes to mitigate the visual impact and encourage on-site visual amenity to be considered from the outset.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	++ ++ ++ / / ++ / / +	Mitigation not required as no negative impacts identified. Compensation for loss of trees or soft landscape may have impact on viability.
<b>Commentary</b> Option 2 has been chosen as the additional ability to promote soft landscaping as well as tree planting would have a positive impact on SA objectives 1,2,3 and 6, and some positive impact on 7 and 9 by enhancing the visual attractiveness of the environment and encouraging mobility through environments that provide more sustainable benefits. There is a neutral impact on SA objectives 4, 5 and 8 although it is mentionable the effect a positive natural environment has on wellbeing by living and or working in a well-designed environment that incorporates the benefits of nature.			
Option 3: Amend the existing Local Plan policy requiring tree and soft landscape planning to mitigate the visual impact of new development or the loss of existing trees and soft landscapes.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+/+ +/+ +/+ / / + / /+ +	Mitigation not required as no negative impacts identified. Compensation for loss of trees or soft landscape may have impact on viability.
<b>Commentary</b> The amendment to the policy promotes benefits to the SA objectives 1, 2, 3 and 6 in terms of improving visual impact for the built environment. Objectives 4,5 and 7 have a neutral impact from the changes to this policy.			
Option 4: Delete policy and rely on the NPPF.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+/+ +/+ +/+ / / + / / +	Mitigation not required as no negative impacts identified.
<b>Commentary</b> The NPPF offers general guidance in terms of dealing with impacts and mitigation but does require development to be of a high design standard. This approach would not necessarily deliver as many additional or replacement trees, which are an important component of the town's character and appearance and offer other benefits (SA objectives 1, 2, 3, 6, 7 and 9). The approach may be slightly more positive in terms of the amount of development (SA objectives 4, 5 and 8).			

#### Policy LC4: Tree Replacement Standards

Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<b>Option 1:</b> A policy will be created in the Local Plan requiring additional planting to mitigate the visual impact of new development or the loss of existing trees. Option 1 has been chosen as additional or replacement tree planting would have a very positive impact on SA objectives 1, 2, 3 and 6, and some positive impact in		

	relation to objectives 7 and 9. There would be a neutral impact on the provision in respect of objectives 4, 5 and 8 although a more attractive environment could assist in attracting investment.		
Option 1: A policy will be created in the Local Plan requiring additional planting to mitigate the visual impact of new development or the loss of existing trees.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	++ ++ ++ / / ++ / + / +	Mitigation not required as no negative impacts identified. Compensation for loss of trees may have impact on viability.
<b>Commentary</b> Option 1 has been chosen as additional or replacement tree planting would have a very positive impact on SA objectives 1, 2, 3 and 6, and some positive impact in relation to objectives 7 and 9. There would be a neutral impact on the provision in respect of objectives 4, 5 and 8 although a more attractive environment could assist in attracting investment.			
Option 2: Split the existing policy into two policies one requiring additional planting of trees and soft landscapes to mitigate the visual impact and encourage on-site visual amenity to be considered from the outset.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+/+ +/+ +/+ / / + +/+ / /	Mitigation not required as no negative impacts identified. Compensation for loss of trees may have impact on viability.
<b>Commentary</b> The policy been split into two acknowledges the difference between visual amenity and requirement to replace existing trees for their visual impact. This policy focuses on tree replacement and the effect compensation through planting would have on SA objectives 1, 2, 3 and 6, as well as the positive impacting relations to 7 and 9 of living and or working in a more positive environment enhanced by natural capital.			
Option 3: Delete policy and rely on the NPPF.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+/+ +/+ +/+ / / + / / / /	Mitigation not required as no negative impacts identified. Compensation for loss of trees may have impact on viability.
<b>Commentary</b> The NPPF offers general guidance in terms of dealing with impacts and mitigation but does require development to be of a high design standard. This approach would not necessarily deliver as many additional or replacement trees, which are an important component of the town's character and appearance and offer other benefits (SA objectives 1, 2, 3, 6, 7 and 9). The approach may be slightly more positive in terms of the amount of development (SA objectives 4, 5 and 8).			

<b>Policy LC5: Development outside the Built-Up Area</b>			
<b>Policy Options</b>	<b>SA Objective with Significant Effect</b>	<b>Positive or Negative Impact</b>	<b>Mitigation of Negative Impacts</b>
Chosen Option	<b>Option 1: Develop local policy to maintain Crawley's compact nature and attractive setting whilst conserving and enhancing the countryside.</b> Option 1, to develop a local policy to conserve and enhance the countryside rather		

	<p>than relying on national guidance, is preferred. This enables landscape of local importance to be conserved and also provides the evidence base to support green infrastructure opportunities and proposals.</p> <p>Options for the countryside between Crawley, Gatwick and Horley were appraised. It was found that conserving and enhancing the open character of the area whilst encouraging appropriate recreational and environmental enhancements is the preferred option. It is considered that the use of a Landscape Character Assessment provides the local distinctiveness to enable the countryside to be conserved and enhanced in a manner that is appropriate in the Crawley context.</p>		
Option 1: Develop local policy to conserve and enhance the countryside.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+	Mitigation not required as no negative impacts identified.
<b>Commentary</b> This enables landscape of local importance to be conserved but also allow development where it respects the surrounding character. It also provides the evidence base to support green infrastructure opportunities and proposals.			
Option 2: Rely on national guidance solely.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+	
<b>Commentary</b> There would be no mechanism for addressing current or future issues which are distinctive to Crawley's landscape character beyond the urban area. With a lack of locally specific evidence it would be difficult for the council to assess the acceptability of proposals in the countryside. Without guidelines it would not be possible to identify the appropriate management and enhancement of areas. On this basis, the option for relying on national policy is not being chosen.			
Option 3: Roll forward existing policy: retain strategic gap.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+	
<b>Commentary</b> An option could be to retain the strategic gap designation but this is now not supported by national policy as it does little to encourage appropriate development. Criteria based policy informed by a Landscape Character Assessment aims to provide the necessary protection for former areas of strategic gap. It is considered			

this is the case, so the retention of strategic gaps is not being chosen.

<b>Policy LC6: High Weald Area of Outstanding Natural Beauty</b>			
<b>Policy Options</b>	<b>SA Objective with Significant Effect</b>	<b>Positive or Negative Impact</b>	<b>Mitigation of Negative Impacts</b>
Chosen Option	<b>Option 1: Having regard to the AONB Management Plan when considering proposals in the AONB.</b> Having regard to the AONB designation and the AONB Management plan is the most suitable option as AONB land is highly valued for its contribution to the landscape.		
Option 1: Having regard to the AONB Management Plan when considering proposals in the AONB.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	/ / + / / ++ / + +	Mitigation not required as no negative impacts identified.
<b>Commentary</b> Respecting the high value landscape of the wider AONB is of benefit to residents of Crawley and those who live and work in the AONB. Active lifestyles are further encouraged through an enhanced landscape that promotes benefits to wellbeing through an area of well managed natural capital. This option encourages investment in wellbeing through supporting the latest AONB Management Plan 2019-2024 benefiting SA objectives 3, 6 and 9.			
Option 2: Not recognising the AONB Management Plan and requiring a local assessment of the area.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	- - + - - + / / +	
<b>Commentary</b> The AONB Unit has been set up to advise on AONB matters and Local Authorities work with them to shape and agree the Management Plan. To not rely on this could negatively impact the role and aims of the AONB.			

## Heritage Assets

Policy HA1: Heritage Assets			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<b>Option 3: Include overarching policy for all heritage assets (including undesignated heritage assets), with policies relating to specific types of designated assets within Crawley.</b> Option 3 has been chosen as it represents the best way to adhere to the NPPF and ensure that the requirements on development relate to the significance of the heritage asset in question. By setting minimum requirements for all heritage assets (designated & undesignated) the basic requirements are set, this can then be built upon utilising further policies relating to specific designations relating to their significance.		
Option 1: Have no policy in heritage assets.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 ? -- 0 / 0 0 0 -  <b>Commentary</b> The NPPF instructs Local Planning Authorities to include a "positive strategy for the conservation and enjoyment of the historic environment". Therefore option 1, which is not to include anything is not an option. This option does not promote or enhance the locally distinctive nature of the town and its unique history and character, nor would it allow for any new areas to be protected, or those that develop over time. The lack of clarity given to a new policy approach could lead to inappropriate developments and the loss of key features throughout the town.	
Option 2: Include single policy relating to all heritage assets (including undesignated heritage assets) with no other policies.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 ? + 0 / 0 0 0 +	
	<b>Commentary</b> It was considered that a single policy may be appropriate for all heritage assets however upon reflection the need to consider the impact on heritage assets in relation to their significance would be hard to achieve. This may result in a policy that was over restrictive on lesser assets whilst not going far enough when looking at very significant assets. It would also struggle to make variations in the policy implications for local or nationally designated assets. Therefore this option was not progressed.		
Option 3: Include overarching policy for all heritage assets (including undesignated heritage assets), with policies relating to specific types of designated assets within Crawley.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes	0 ? ++ 0	Mitigation not required as no negative impacts identified.

relating to specific types of designated assets within Crawley.	5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	/ 0 0 0 +	
<b>Commentary</b>			
This policy provides the ability to adopt an approach for each Heritage Asset at a level that is appropriate to its significance. By having a series of policy, the council will be able to provide clarity to a developer as to what will be required when working on different projects.			

<b>Policy HA2: Conservation Areas</b>			
<b>Policy Options</b>	<b>SA Objective with Significant Effect</b>	<b>Positive or Negative Impact</b>	<b>Mitigation of Negative Impacts</b>
<b>Chosen Option</b>			<b>Option 2: Include Policy for Conservation Area designation.</b> Option 2 was selected as it scored better on the Sustainability Appraisal and will allow for the better management of development in Conservation Areas over the Plan period.
Option 1: Do not include a policy relating to Conservation Areas. Relying on a single overarching policy.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 ? - 0 / 0 0 ?	
<b>Commentary</b>			This approach would result in a negative effect upon the need to protect/enhance the built environment and could lead to the loss of Heritage Assets for the reasons outlined in the appraisal for HA1. This option was ruled out due to the preferred option from HA1.
Option 2: Include Policy for Conservation Area designation.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 ? + 0 / 0 0 +	Mitigation not required as no negative impacts identified.
<b>Commentary</b>			A policy relating to Conservation Areas will effectively protect/enhance the built environment in a manner relevant to its significance. It will also enable policy requirements specifically relating to Conservation Areas to be introduced, such as the loss of certain buildings may be acceptable.

Policy HA3: Areas of Special Local Character			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<b>Option 3: Include policy for ASLC's designation.</b> Option 3 has been chosen to ensure that the local ASLC designation is given the correct weight in planning decisions relevant to its significance.		
Option 1: Do not include a policy relating to ASLC's. Relying on a single overarching policy.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 ? - 0 0 - 0 0 -	
<b>Commentary</b> This approach would result in a negative effect upon the need to protect/enhance the built environment and could lead to the loss of Heritage Assets for the reasons outlined in the appraisal for HA1. This option was ruled out due to the preferred option from HA1. This option would not give significant weight to any locally distinctive designations of other areas and would provide less clarity for developers on where special design, materials or features may be required. This may result in the loss of important characteristics that are significant to the town.			
Option 2: Include policy for all Local Designations.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 ? + 0 0 + 0 0 +	
<b>Commentary</b> A policy relating to ASLC's, Locally Listed Buildings and Historic Parks and Gardens was considered as a way of reducing the number of policies in the plan however the sustainability appraisal showed that as the policy would not be specific enough the benefits of the policy would be restricted. Whilst it may have allowed greater flexibility across these designations it would not have been effective enough.			
Option 3: Include policy for ASLC's designation.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 ? ++ 0 0 + 0 0 +	Mitigation not required as no negative impacts identified.

<b>Commentary</b>			
By including a policy for the ASLC's specific requirements can be set in accordance with their significance and the objectives of the designation.			

<b>Policy HA4: Listed Buildings and Structures</b>			
<b>Policy Options</b>	<b>SA Objective with Significant Effect</b>	<b>Positive or Negative Impact</b>	<b>Mitigation of Negative Impacts</b>
Chosen Option	<b>Option 3: Include Policy for Listed Buildings &amp; Structures.</b> Option 3 has been chosen to ensure that the Listed Buildings are given the correct weight in planning decisions relevant to their significance. Whilst Listed Buildings are protected by law, including a specific policy that will apply to them will ensure that the planning system does not overlook the designation and afford their significance due weight.		
Option 1: Do not include a policy relating to Listed Buildings & Structures. Relying on a single overarching policy.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 ? - 0 / 0 0 0 -	
<b>Commentary</b> This approach would result in a negative effect upon the need to protect/enhance the built environment and could lead to the loss of Heritage Assets for the reasons outlined in the appraisal for HA1. This option was ruled out due to the preferred option from HA1. This option would not give significant weight to listed buildings & structures and would provide less clarity for developers on where special design, materials or features may be required. This may result in the loss of important characteristics that are significant to the town.			
Option 2: Include policy for all National Designations.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 ? +? 0 / 0 0 0 +?	
<b>Commentary</b> A policy relating to all national designations was considered as a way of reducing the number of policies in the plan however the sustainability appraisal showed that as the policy would not be specific enough the benefits of the policy would be restricted. Whilst it may have allowed greater flexibility across designations it would not have been effective enough.			
Option 3: Include policy for Listed Buildings & Structures.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity	0 ? + 0 / -	Mitigation not required as no negative impacts identified.

	and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 0 0 +	
<b>Commentary</b> By including a policy that reflects the significance of listed buildings and structures, the requirements can be set in accordance with their significance and the objectives of the designation. This option scored highest on the sustainability appraisal so was chosen.			

<b>Policy HA5: Locally Listed Buildings</b>			
<b>Policy Options</b>	<b>SA Objective with Significant Effect</b>	<b>Positive or Negative Impact</b>	<b>Mitigation of Negative Impacts</b>
Chosen Option:	<b>Option 3: Include policy for Locally Listed Buildings.</b> Option 3 has been chosen to ensure that the Locally Listed Building designation is given the correct weight in planning decisions relevant to its significance.		
Option 1: Do not include a policy relating to Locally Listed Buildings. Relying on a single overarching policy.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 ? - 0 / 0 0 0 -	
<b>Commentary</b> This approach would result in a negative effect upon the built environment and could lead to the loss of Heritage Assets for the reasons outlined in the appraisal for HA1. This option was ruled out due to the preferred option from HA1. This option would not give significant weight to any locally distinctive designations of other areas and would provide less clarity for developers on where special design, materials or features may be required. This may result in the loss of important characteristics that are significant to the town.			
Option 2: Include policy for all Local Designations.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 ? + 0 / 0 0 0 +	
<b>Commentary</b> A policy relating to ASLC's, Locally Listed Buildings and Historic Parks and Gardens was considered as a way of reducing the number of policies in the plan however the sustainability appraisal showed that as the policy would not be specific enough the benefits of the policy would be restricted. Whilst it may have allowed greater flexibility across these designations it would not have been effective enough.			
Option 3: Include policy for Locally Listed Buildings.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment	0 ? ++	

	4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 / 0 0 0 +	
<b>Commentary</b>			
This option has been chosen as provides the best outcome. Ensuring development matched the significance of the heritage asset is key and by ensuring policy reflects this is vital to ensure the built environment is protected and enhanced as we move forwards.			

<b>Policy HA6: Historic Parks and Gardens</b>			
<b>Policy Options</b>	<b>SA Objective with Significant Effect</b>	<b>Positive or Negative Impact</b>	<b>Mitigation of Negative Impacts</b>
Chosen Option:			<b>Option 3: Include policy for Historic Parks &amp; Gardens.</b> Option 3 was chosen as it provides the best protection of important features which make up the designated park/garden.
Option 1: Do not include a policy relating to Historic Parks & Gardens. Relying on a single overarching policy.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 ? - 0 0 - 0 0 -	
<b>Commentary</b>			Without the designation and supporting evidence there would be uncertainty as to the features to protect. This could lead to important features being lost or over protection of areas.
Option 2: Include policy for all Local Designations.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 ? + 0 / + 0 0 +	Potential negative impact on SO4 will be mitigated against through the identification of key housing sites within Policy H2, and moreover, meeting as much of the objectively assessed housing need within the administrative boundaries of Crawley, unless constraints dictate otherwise.
<b>Commentary</b>			A policy relating to ASLC's, Locally Listed Buildings and Historic Parks and Gardens was considered as a way of reducing the number of policies in the plan however the sustainability appraisal showed that as the policy would not be specific enough the benefits of the policy would be restricted. Whilst it may have allowed greater flexibility across these designations it would not have been effective enough.
Option 3: Include policy for Historic Parks & Gardens.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment	0 0 ++	Potential negative impact on SO4 will be mitigated against through the identification of key housing sites within Policy H2, and moreover,

	4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 / + 0 0 +	meeting as much of the objectively assessed housing need within the administrative boundaries of Crawley, unless constraints dictate otherwise.
<b>Commentary</b>			
By identifying the Historic Parks and Gardens that warrant protection, clarity is provided to developers, as well as defining the merits and role of any designation. Sustainability Objectives 7, 8, and 10 are not relevant with regards to infrastructure provision, reducing car journeys and participation in sport. The chosen option allows development to respect the setting and identity of an area and can be more locally distinctive. Relying on the NPPF does not allow such thorough application in special areas.			

## Open Space, Sport & Recreation

<b>Policy OS1: Open Space, Sport and Recreation</b>			
<b>Policy Options</b>	<b>SA Objective with Significant Effect</b>	<b>Positive or Negative Impact</b>	<b>Mitigation of Negative Impacts</b>
Chosen Option	<b>Option 1: Use the open space assessment to determine the needs and opportunities for sport as well as surplus areas for alternative uses. Outside Local Plan Allocations open space will be protected unless proven to be surplus.</b> Option 1 is chosen as it makes the best use of open space to meet Local Plan objectives		
Option 1: Use the open space assessment to determine the needs and opportunities for sport as well as surplus areas for alternative uses. Outside Local Plan Allocations open space will be protected unless proven to be surplus.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	/ + + + + + + + +	Mitigation not required as no negative impacts identified.
Option 2: Protect all open space unless proposals clearly show the site to be surplus.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities	+ + / - - / + +	

	and Encourage active lifestyles	+	
<b>Commentary</b>			
This option puts the onus on developers to justify any loss of any open space. This could lead to protection of open space that would be better suited to an alternative type of open space or type of development. SA objectives 1 and 6 are met where types of open space that are themselves based around natural capital help sustain the local environment.			

<b>Policy OS2: Provision of Open Space and Recreational Facilities</b>			
<b>Policy Options</b>	<b>SA Objective with Significant Effect</b>	<b>Positive or Negative Impact</b>	<b>Mitigation of Negative Impacts</b>
Chosen Option	<b>Option 2: Requires that impacts of an increased population on open space are mitigated/compensated for through CIL or onsite provision and that s106 agreements can also be sought to secure the replacement of open space.</b> Option 2 is most suitable as it aims to provide infrastructure to support the growth of the town through multiple means of securing financial contributions when needed.		
Option 1: Requires that impacts of an increased population on open space are mitigated/compensated for through CIL or onsite provision.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+ + + - + + / ++ ++ ++	May restrict the number of houses built.
	<b>Commentary</b> This option aims to provide new open space where possible and enhance existing open space to mitigate the impact of an increasing population.		
Option 2: Requires that impacts of an increased population on open space are mitigated/compensated for through CIL or onsite provision and that s106 agreements can also be sought to secure the replacement of open space.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and encourage active lifestyles	+ + + + / + + + +	May restrict the number of houses built.
	<b>Commentary</b> This option includes s106 agreements as a method of securing the replacement of open space. Providing a positive impact to SA objectives 1, 2, 3, 4, 7, 8 and 9. SA objective 5 has a neutral impact although the type of provision may increase opportunities for employment.		
Option 3: Not to charge CIL or seek open space as part of development where appropriate.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 0 0 + / 0 0 - -	
	<b>Commentary</b> Over time the impact of an increased population but no additional open space will		

	place greater pressure on existing spaces and facilities. The quality of these spaces will be negatively affected and the consequence could be a decline in the health and well-being of Crawley residents.
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### Policy OS3: Rights of Way and Access to the Countryside

Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<b>Option 1: Maintain and enhance Public Rights of Way.</b> The most suitable option is to maintain and enhance PRoW as it has most positive impact on sustainability.		
Option 1: Maintain and enhance Public Rights of Way.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 0 + 0 0 + ++ + ++	Mitigation not required as no negative impacts identified.
<b>Commentary</b> This option encourages use of rights of way for health and well-being as well as a route to get to work or other locations. It promotes the ability of green infrastructure to be incorporated into public bridleways supporting SA objectives 3, 7 and 9.			
Option 2: Rely on the NPPF.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 0 + 0 0 / / / /	
<b>Commentary</b> Relying on the NPPF creates uncertainty as there is little detail on how PRoW should be protected or identification of specific opportunities to enhance PRoW.			

### Infrastructure Provision

#### Policy IN1: Infrastructure Provision

Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<b>Option 1: A policy on Infrastructure Provision setting out in broad terms how development proposals will be assessed in respect of their infrastructure needs and their impact on existing infrastructure.</b> Option 1 has been chosen as it is considered to give more support to the provision of infrastructure than relying solely on the NPPF. As infrastructure includes a wide range of buildings and services it can contribute to sustainability objectives in a variety of ways by adding to the quality of life through the provision of social infrastructure and by ensuring that other services have sufficient capacity to meet the needs of the borough. If these needs were not met then there would be specific		

	environmental issues as well as a poor quality of life. The retention and enhancement of social infrastructure facilities within the town also promote sustainable patterns of travel.		
Option 1: A policy on Infrastructure Provision setting out in broad terms how development proposals will be assessed in respect of their infrastructure needs and their impact on existing infrastructure.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+	Mitigation not required as no negative impacts identified.
<b>Commentary</b> The main objective of this policy is to ensure that development meets its infrastructure needs through the use of existing infrastructure or new infrastructure where its need is generated by the new development. It is important that this is highlighted locally to maximise links to the Infrastructure Plan which sets out the provision of infrastructure in the town in more detail and to link to how the infrastructure is to be funded, including through developer contributions. Although there is a neutral effect on some sustainability objectives, policies elsewhere in the plan deal more effectively with these issues.			
Option 2: Do not introduce a local policy and rely on NPPF	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	- - 0 - - - - -- -	

<b>Policy IN2: The Location and Provision of New Infrastructure</b>			
<b>Policy Options</b>	<b>SA Objective with Significant Effect</b>	<b>Positive or Negative Impact</b>	<b>Mitigation of Negative Impacts</b>
Chosen Option	<b>Option 1: Locating new infrastructure in the most appropriate and/or accessible locations.</b> There are significant benefits in locating development in the most accessible location as this will affect the length of journeys and how people travel to infrastructure. (SA objective 1 and 7) If infrastructure is accessible by public transport or can be walked or cycled to, there are benefits in terms of reduced car trips and reduced pollution. Some forms of infrastructure do not generate a significant number of trips as they contain plants and machinery and may be located in alternative locations. In determining the most accessible location, the catchment of the infrastructure will be taken into account as infrastructure can either be provided on a town wide basis or within each neighbourhood. There are also benefits to SA objective 9 as it can help		

	maximise the use of these facilities by less mobile sections of the population.		
Option 1: Include a policy requiring location of new infrastructure in the most appropriate and/or accessible locations.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+	Mitigation not required as no negative impacts identified.
<b>Commentary</b>			
Locating facilities in the most accessible locations will affect how people choose to travel to the facilities. The neighbourhood structure of the town also helps encourage the provision of facilities with a neighbourhood catchment within the neighbourhoods themselves. Maximising the number of people walking, cycling and using public transport can help reduce car journeys, pollution and the impact on climate change. The provision of facilities in accessible locations can maximise the use of health, sports and social facilities for people who do not have access to a private car. This can therefore contribute to SA objectives 9 and 10.			
Option 2: Do not include a policy regarding location of infrastructure and instead rely on the NPPF policies.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	- / 0 - - - - - -	
<b>Commentary</b>			
Relying on the principles of the NPPF would make it harder for the Local Planning authority to ensure that infrastructure facilities are provided in the most appropriate or accessible locations, with an associated risk that less sustainable patterns of travel would arise, or that infrastructure facilities might be located in the vicinity of incompatible land uses.			

Policy IN3: Supporting High Quality Communications			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<b>Option 1: A specific policy relating to the strategic delivery of telecommunications.</b>  Option 1 has been chosen as it could have greater benefits than relying on the general provision of infrastructure. It is important that developments have the ability to connect to broadband services and any other communications infrastructure that may be delivered in the future to maximise the benefits to both business and		
Option 1: A specific policy relating to the strategic delivery of telecommunications.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance	+	Mitigation not required as no negative impacts identified.

	biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+? + ++ +	
<b>Commentary</b> Telecommunications are a basic everyday need and are essential to the realisation of a wide range of economic, social and environmental benefits. By designing for the provision of such infrastructure from the outset, this will help minimise disruption, costs and the use of resources to retrofit it, into development.			
Option 2: Relying on the policies dealing with the general provision of infrastructure.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+? +? +? +? +? ? +? ++? +?	
<b>Commentary</b> Telecommunications infrastructure would to some extent be covered by the main infrastructure policy which applies to a wide range of infrastructure, but this is unlikely to be as effective as a policy highlighting the requirements for designing for telecommunications infrastructure.			

## Economic Growth

Policy EC1: Sustainable Economic Growth			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<b>Option 3:</b> Adopt a spatial approach which recognises Crawley as a key employment destination and applies a supply-led approach for the early years of the Plan period, protecting the designated employment and planning positively to maximise new opportunities within the borough. Subject to the status of safeguarding, and a commitment to working with neighbouring authorities to Plan positively for economic growth.		
Option 1: Rely only on the National Planning Policy Framework to ensure that identified economic growth is supported and ensure that employment is directed to the most appropriate and sustainable locations.	1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/ support employment base 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	? ? ? ? ? 0 ? 0 0 0 0	

	<p><b>Commentary:</b></p> <p>This approach would rely on the NPPF as a means of directing employment to the most appropriate and sustainable locations. A reliance solely on the NPPF would ignore the need for a holistic vision for economic growth in Crawley and its impact on the wider economic function of the sub-region over the Plan period, particularly as the approach would fail to take account of locally specific circumstances. Without a locally-specific strategy in place, there is risk that the economic growth requirements of the borough and the wider sub-region will not be adequately planned for or accommodated. This is particularly the case given Crawley's limited land supply, which necessitates a clear strategic vision and policy approach through the Local Plan in order to balance the conflicting needs of housing and employment provision. Absence of a clear policy approach directing employment growth to the most sustainable locations potentially creates uncertainty as to how employment and housing needs will be accommodated. Without a clear local vision that places Crawley at the centre of the economic growth for the wider area, there is a risk that Crawley's key economic function will be eroded, potentially impacting negatively upon the growth within Crawley and the wider Gatwick Diamond.</p>		
Option 2: Adopt a spatial approach which recognises Crawley as a key employment destination and applies a supply-led approach to direct identified business-led employment need to existing available employment sites within the borough. Plan only for need that can be accommodated in Crawley, and do not consider options to accommodate unmet growth.	<ol style="list-style-type: none"> <li>1. To minimise climate change</li> <li>2. To adapt to climate change</li> <li>3. Protect/enhance built environment</li> <li>4. Decent, affordable homes</li> <li>5. Maintain/ support employment base</li> <li>6. Conserve/enhance biodiversity and landscape</li> <li>7. Promote sustainable journeys</li> <li>8. Provide sufficient infrastructure</li> <li>9. Promote healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles</li> </ol>	<p>-?</p> <p>-?</p> <p>?</p> <p>?</p> <p>+?</p> <p>?</p> <p>?</p> <p>?</p> <p>?</p> <p>0</p>	
	<p><b>Commentary:</b></p> <p>Emerging findings from the Economic Growth Assessment 2019 suggest that there is a need for between 44.6 and 57.63 hectares additional business land over the Plan period to 2035. Under Option 2, the Local Plan would take a supply-led approach to accommodate as much of the business land need as can be reasonably planned for. On this basis, the Local Plan, through protecting the designated main employment areas, would be able to identify approximately 11.75 hectares of business-led employment land supply within the borough boundary, leaving a significant unmet need of between 32.85 and 45.86 hectares business land. This would mean that the identified need for business land at Crawley would not be met over the Local Plan period. It is likely that to take this approach could result in jobs and business being lost from the Gatwick Diamond to other locations, jeopardising the economic function of both Crawley and the Gatwick Diamond. In failing to plan for longer-term business needs, the approach leaves Crawley vulnerable to inappropriate applications and increases the risk of planning by appeal. Further, through failing to proactively engage with adjoining authorities, the approach fails to meet the requirements of Duty to Cooperate.</p>		
Option 3: Adopt a spatial approach which recognises Crawley as a key employment destination and applies a supply-led approach for the early years of the Plan period, protecting the designated employment and planning positively to maximise new opportunities within the borough. Subject to the status of safeguarding, and a commitment to working with neighbouring authorities to Plan positively for economic growth.	<ol style="list-style-type: none"> <li>1. To minimise climate change</li> <li>2. To adapt to climate change</li> <li>3. Protect/enhance built environment</li> <li>4. Decent, affordable homes</li> <li>5. Maintain/ support employment base</li> <li>6. Conserve/enhance biodiversity and landscape</li> <li>7. Promote sustainable journeys</li> <li>8. Provide sufficient infrastructure</li> <li>9. Promote healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles</li> </ol>	<p>?</p> <p>?</p> <p>0</p> <p>+</p> <p>+</p> <p>++</p> <p>+</p> <p>+</p> <p>+</p> <p>+</p>	Mitigation not required as no negative impacts identified.
	<p><b>Commentary:</b></p> <p>Emerging findings from the Economic Growth Assessment 2019 suggest that there</p>		

is a need for between 44.6 and 57.63 hectares additional business land over the Plan period to 2035. On this basis, the Local Plan would be able to identify approximately 11.75 hectares of business-led employment land supply within the borough boundary, leaving a significant unmet need of between 32.85 and 45.86 hectares business land.

This option would enable a continuation of the adopted Local Plan 2015 approach, protecting the designated main employment areas for economic growth and supporting their intensification, whilst considering the scope for small scale extensions of Manor Royal to provide additional business-led employment land. Recognising the economic importance of strategic growth at Crawley, the approach, subject to confirmation through the emerging EGA 2019, would assess the contribution made by the planned Strategic Business Park at Horley (Reigate and Banstead Borough) in accommodating Crawley's unmet needs, and would provide a clearer view as to how this may affect any remaining unmet needs and how these can best be planned for. This could potentially be within Crawley's borough boundary subject to a government decision on safeguarding, or identified through ongoing work with neighbouring authorities.

<b>Policy EC2: Economic Growth in Main Employment Areas</b>			
<b>Policy Options</b>	<b>SA Objective with Significant Effect</b>	<b>Positive or Negative Impact</b>	<b>Mitigation of Negative Impacts</b>
Chosen Option	<b>Option 2:</b> Retain the Local Plan 2015 approach, identifying protecting the main employment areas for flexible economic growth, and setting out criteria that must be satisfied where a loss of employment land or floorspace is proposed.		
Option 1: Rely only on the National Planning Policy Framework to ensure that economic growth is directed to the most sustainable and appropriate locations.	1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/ support employment base 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	-? -? 0 0 -- 0 -? 0 -? 0	
<b>Commentary:</b> The NPPF sets out the requirement for planning policies to set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth. It highlights the need for policies to identify strategic sites and be flexible to address barriers to investment and meet needs not anticipated in the Plan. Option 1 would not set out a clear strategy based on locally-specific evidence, and there is risk that the economic growth of the borough (and the wider sub-region) could not therefore be delivered in a planned manner. Given Crawley's role as a sub-regional employment destination at the heart of the Gatwick Diamond, to rely solely on national planning policy without having regard to evidence base, would not represent a sound planning approach to delivering sustainable economic development. Without a clear local vision and employment hierarchy, it is uncertain how economic growth could be directed to the most sustainable locations, or clarity be provided to key investors and land owners. As such, the impacts of the approach in terms of climate change, car journey reduction, and promotion of sustainable communities is uncertain. Further, by failing to identify employment locations at the local level, it is likely that the approach could negatively impact upon the function of established employment locations. Having regard to the above, Option 1 is not considered to represent the most sustainable approach to promoting economic growth, and is therefore dismissed.			
Option 2: Retain the Local Plan 2015 approach, identifying protecting the main employment areas for	1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes	+ + 0 0	Mitigation not required as no negative impacts identified.

flexible economic growth, and setting out criteria that must be satisfied where a loss of employment land or floorspace is proposed.	5. Maintain/ support employment base 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	++ + + 0 0 0	
<p><b>Commentary:</b></p> <p>Under Option 2, the Local Plan would retain its approach in designating main employment areas that are protected for employment use. The approach is flexible to support a range of economic growth across the main employment areas, whilst specifically prioritising Manor Royal for business and business related development. Any loss of employment land or floorspace would need to be justified against set criteria.</p> <p>As such, Option 2 would enable the Local Plan to plan to proactively meet the needs of business whilst setting out a clear economic vision and strategy for the area. Further, the approach reflects NPPF requirements to identify strategic sites for investment, whilst remaining flexible. In this regard, the implementation of a locally and spatially specific policy approach that applies the guidance of the NPPF and steers economic growth at Crawley, is considered to represent a vital component of the Local Plan.</p> <p>In identifying a clear network and hierarchy of employment sites across the borough for economic growth, the approach should contribute towards the reduction of car journeys, and promotion of sustainable communities and minimisation/ adaptation to climate change, whilst promoting a strong employment space through a clearly defined hierarchical approach. Further, through identifying sites that will act as a clear economic focus (taking into account locally specific requirements and circumstances as identified in the Economic Growth Assessment), the approach enables the council to direct housing to sustainable identified allocations, including the Town Centre as a key focus for housing delivery. This also ensures that the focus of new employment development is located in proximity to the economic hubs of the town, and where housing would not be appropriate given the noise and other environmental constraints.</p>			

<b>Policy EC3: Office Provision</b>			
<b>Policy Options</b>	<b>SA Objective with Significant Effect</b>	<b>Positive or Negative Impact</b>	<b>Mitigation of Negative Impacts</b>
Chosen Option	<b>Option 2 :</b> Option 2 would help the Local Plan to actively support office development, helping to redress the stock lost through PDR, whilst making for an efficient use of Crawley's limited available land supply and adding to the wider stock of Grade A offices.		
Option 1: Do not include a policy to support office growth.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 0 0 0 0 0 0 0 0	
<p><b>Commentary</b></p> <p>This option would rely on the Local Plan economic policies to retain and build upon Crawley's economic function. The approach would not specifically encourage office use, but would support the delivery of office space as well as other forms of B-class business and other employment uses.</p>			

Option 2: Include a new policy relating to office uses.	1. Minimise climate change	+	
	2. Adapt to climate change	?	
	3. Protect/enhance built environment	+	
	4. Decent, affordable homes	0	
	5. Maintain/support employment	++	
	6. Conserve/enhance biodiversity and landscape	0	
	7. Promote sustainable journeys	0	
	8. Provide sufficient infrastructure	0	
	9. Promote sustainable communities and Encourage active lifestyles	+	
	<b>Commentary</b>		
<p>The emerging 2019 EGA anticipates growth of 2,800 new jobs over the Plan period to 2035, equating to use class B1a/b floorspace requirement of 169,020 sqm. Of the identified business land requirement of between 44.6 and 57.6 hectares, around 25 hectares would be needed to accommodate the forecast demand for office growth. It is recognised that a significant amount of Crawley's office supply has been lost through prior approval conversions, and whilst there is a strong office demand to locate in Crawley, the relative lack of A Grade premises is repressing the market. Further, it is recognised that office development typically makes for a more efficient use of land (floorspace and jobs per sqm), which tallies with the EC2 approach which supports the intensification of existing main employment areas.</p>			

<b>Policy EC4: Visitor Accommodation</b>			
<b>Policy Options</b>	<b>SA Objective with Significant Effect</b>	<b>Positive or Negative Impact</b>	<b>Mitigation of Negative Impacts</b>
Chosen Option	<b>Option :</b> Option 2 has been chosen		
Option 1: Not to include a specific policy relating to visitor accommodation	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	- 0 0 0 0 0 - 0 0	
	<b>Commentary</b> Hotel and leisure accommodation is an employment generating use, and is also identified in the NPPF as a main town centre uses, therefore being subject to the sequential test. In principle, the NPPF could guide applications for visitor accommodation, however this would not enable locally specific circumstances to be taken into account. One issue that needs to be dealt with, for consistency with GAT3, is where off-airport hotels are used as a location for off-airport parking. This issue could not be picked up without a Local Plan policy, and therefore is less sustainable.		
Option 2: Introduce a new hotel and visitor accommodation policy to set out locally specific planning guidance for such uses.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+ + + 0 + 0 ++ 0 0	
	<b>Commentary</b> There has recently been significant pre-application interest from a number of hotel operators seeking to locate in Crawley, and this is likely to grow should		

	Gatwick Airport expand. Hotel accommodation provides an important role, both in creating jobs and in meeting the needs of business visitors and people flying to/from Gatwick Airport. However, it is considered that a specific policy is needed to help guide the nature of hotel development in specific locations, including the whether the proposed location is appropriate, the type of facilities it provides, and its approach to sustainable development, particularly where off-airport parking may be an issue. A specific policy relating to hotels can better guide this process, and is considered to represent the most sustainable option.
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#### Policy EC5: Night-Time Economy

Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<b>Option :</b> Option 2 has been chosen		
Option 1: Do not include a specific policy relating to the night time economy	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 0 0 0 0 0 0 0 0	
	<b>Commentary</b> To support town centre vitality and viability, it is desirable to encourage a range of main town centre uses, including those that support activity during the daytime and evenings. The Town Centre policies of the Local Plan support a range of main town centre uses, including those that would fall within the bracket of evening and night-time economy. A key issue with this approach is that it is not pro-active in encouraging these uses, when a positive approach could support the overall vibrancy of the town centre. Equally, it is possible that evening and night-time economy uses may be desirable in other parts of town, and this would not be explicitly picked up under other policies.		
Option 2: Support the evening and night-time economy through a specific Local Plan policy.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 0 0 0 0 + 0 ?+ 0	
	<b>Commentary</b> The addition of a specific evening and night-time economy policy can more proactively support the vitality and viability of Crawley Town Centre, including through helping to meet the needs of its growing residential population. It also can help to support appropriate development that provide an evening offer in other identified locations, for example Manor Royal or the neighbourhood centres. The approach also gives the Plan an opportunity to cross reference to relevant amenity policies, for example those relating to noise.		

#### Policy EC6: Employment and Skills Development

Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<b>Option :</b>		

	Option 2 has been chosen.		
Option 1: Do not provide a specific skills policy, relying on the Employment and Skills Programme to help address the skills gap.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	?+ ?+ 0 ?+ + 0 ?+ 0 ?+	
<b>Commentary</b> Crawley's resident workforce has a lower than average level of Qualifications at NVQ4 and above (33.2%) when compared to the South East region (42.2%) and Great Britain (39.3%) as a whole. The emerging update to the Economic Growth Assessment (2019) finds that whilst positive steps are being made, the borough is still behind both Horsham (42.3%) and Mid Sussex (46.3%). This has resulted in fewer Crawley residents accessing the higher paid jobs, which are significantly taken up by people commuting in from outside the Borough. Significant work to address the skills gap is being made through Crawley Employment and Skills Programme, though this relies significantly on developers voluntarily signing up to the developer charter. Without a dedicated Local Plan policy, this process would continue to operate on a purely voluntary basis.			
Option 2: Pro-actively support the Crawley Employment and Skills Programme through a specific Local Plan policy.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+ + + + ++ 0 + 0 + +	
<b>Commentary</b> Crawley's resident workforce has a lower than average level of Qualifications at NVQ4 and above (33.2%) when compared to the South East region (42.2%) and Great Britain (39.3%) as a whole. The emerging update to the Economic Growth Assessment (2019) finds that whilst positive steps are being made, the borough is still behind both Horsham (42.3%) and Mid Sussex (46.3%). This has resulted in fewer Crawley residents accessing the higher paid jobs, which are significantly taken up by people commuting in from outside the Borough. Significant work to address the skills gap is being made through Crawley Employment and Skills Programme, though this relies significantly on developers voluntarily signing up to the developer charter. A dedicated policy could secure sign up to the Developer Charter or Town Centre Skills academy, meaning the new development in the town is positively contributing to its location. It may also be possible to secure a developer contribution towards the Employment and Skills Programme, subject to viability testing. This approach can play a positive role in supporting local people in accessing higher paid jobs, addressing the local skills gap and helping employers to recruit from a local employment base.			

Policy EC7: Creative Industries			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<b>Option :</b> Option 2 has been chosen		
Option 1: Do not identify a specific Creative	1. Minimise climate change	0 0	

Industries policy, instead relying on the wider Local Plan economy and Town Centre policies to support these uses.	2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 0 + 0 0 0 0 +	
<b>Commentary</b>			
Option 2: Support the Creative Industries in Crawley through a specific policy.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 0 0 0 + 0 0 0 +	
<b>Commentary</b>			

Policy EC8: Flexible Temporary Art and Creative Uses			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option:	<b>Option :</b> Option 1 has been chosen		
Option 1: Include a policy to support the temporary use of buildings and spaces for creative uses.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 0 + 0 + 0 ?+ ? +	

	<b>Commentary</b> It is recognised that Crawley Town Centre in particular contains a number of vacant buildings or space, which could be brought into beneficial temporary use to support the creative industries, for example through pop up stores or markets. Including a policy in the Local Plan could help to encourage this approach, helping to introduce vitality and vibrancy to under-used sites.																		
Option 2: Do not include a policy on flexible temporary art and creative uses.	<table border="1"> <tr><td>1. Minimise climate change</td><td>0</td></tr> <tr><td>2. Adapt to climate change</td><td>0</td></tr> <tr><td>3. Protect/enhance built environment</td><td>?+</td></tr> <tr><td>4. Decent, affordable homes</td><td>0</td></tr> <tr><td>5. Maintain/support employment</td><td>?+</td></tr> <tr><td>6. Conserve/enhance biodiversity and landscape</td><td>0</td></tr> <tr><td>7. Promote sustainable journeys</td><td>0</td></tr> <tr><td>8. Provide sufficient infrastructure</td><td>0</td></tr> <tr><td>9. Promote sustainable communities and Encourage active lifestyles</td><td>?+</td></tr> </table> <p><b>Commentary</b> This approach would rely on the other economic and town centre policies, so would not specifically encourage the temporary use of vacant buildings or space. This is not to say that such uses would not come forward, but the Local Plan would not be explicitly supporting these.</p>	1. Minimise climate change	0	2. Adapt to climate change	0	3. Protect/enhance built environment	?+	4. Decent, affordable homes	0	5. Maintain/support employment	?+	6. Conserve/enhance biodiversity and landscape	0	7. Promote sustainable journeys	0	8. Provide sufficient infrastructure	0	9. Promote sustainable communities and Encourage active lifestyles	?+
1. Minimise climate change	0																		
2. Adapt to climate change	0																		
3. Protect/enhance built environment	?+																		
4. Decent, affordable homes	0																		
5. Maintain/support employment	?+																		
6. Conserve/enhance biodiversity and landscape	0																		
7. Promote sustainable journeys	0																		
8. Provide sufficient infrastructure	0																		
9. Promote sustainable communities and Encourage active lifestyles	?+																		

<b>Policy EC9: Manor Royal</b>																					
<b>Policy Options</b>	<b>SA Objective with Significant Effect</b>	<b>Positive or Negative Impact</b>	<b>Mitigation of Negative Impacts</b>																		
Chosen Option	<b>Option :</b> Option 1 has been chosen																				
Option 1: Manor Royal as the first choice location for B use class business, with flexibility for other non B use classes only when they complement and support its function as a business district.  The policy will draw upon the Manor Royal Design Guide SPD to achieve high landscaping design for key frontages and gateway sites.	<table border="1"> <tr><td>1. To minimise climate change</td><td>+?</td></tr> <tr><td>2. To adapt to climate change</td><td>+?</td></tr> <tr><td>3. Protect/ enhance built environment</td><td>++</td></tr> <tr><td>4. Ensure everyone has the opportunity to live in a decent and affordable home.</td><td>0</td></tr> <tr><td>5. Maintain/ support employment base</td><td>0</td></tr> <tr><td>6. Conserve/ enhance biodiversity habitats</td><td>+</td></tr> <tr><td>7. Reduce car journeys</td><td>+</td></tr> <tr><td>8. Ensure the provision of sufficient infrastructure</td><td>+</td></tr> <tr><td>9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles</td><td>+</td></tr> </table>	1. To minimise climate change	+?	2. To adapt to climate change	+?	3. Protect/ enhance built environment	++	4. Ensure everyone has the opportunity to live in a decent and affordable home.	0	5. Maintain/ support employment base	0	6. Conserve/ enhance biodiversity habitats	+	7. Reduce car journeys	+	8. Ensure the provision of sufficient infrastructure	+	9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	+		Mitigation not required as no negative impacts identified.
1. To minimise climate change	+?																				
2. To adapt to climate change	+?																				
3. Protect/ enhance built environment	++																				
4. Ensure everyone has the opportunity to live in a decent and affordable home.	0																				
5. Maintain/ support employment base	0																				
6. Conserve/ enhance biodiversity habitats	+																				
7. Reduce car journeys	+																				
8. Ensure the provision of sufficient infrastructure	+																				
9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	+																				
	<b>Commentary</b> This Option would take the same approach as applied to Manor Royal in the 2015-2030 Local Plan, protecting Manor Royal for B-class business and business-supporting uses. This reflects the evidence base recommendations of the 2014 Economic Growth Assessment that Manor Royal should serve as the first choice for B-Class business use.  Option 1 draws upon the locally specific evidence base of the Economic Growth Assessment which has identified clear demand for a significant amount of B Class employment floorspace in Crawley over the plan period. With only a limited supply of employment land available, the evidence base identifies that Manor Royal should represent the first choice destination for B Class employment uses, and that other employment typologies should only be permitted where it can be demonstrated that proposals would not undermine the business function of the estate. This greater scrutiny of other economic development uses enables the local plan to set out a clear strategic approach to employment, recognising the function of Crawley's Main Employment Areas on a holistic basis. The approach also provides a policy hook for the Manor Royal Design Guide SPD, which is recognised as a key means of improving the overall Manor Royal environment, and for referring to the Manor Royal																				

	<p>developer contribution.</p> <p>In doing so, the option has been chosen to drive physical and aesthetic improvements to the built environment (SA Objective 3) and maximise the performance of Crawley's economy (SA Objective 5). These, couple with positive impacts against other indicators, mean that option 1 is considered to represent the most sustainable approach.</p> <p>Enhancement of Manor Royal as a business location will not necessarily create a net impact on climate change, but through providing a policy hook for the Design Guide SPD there is scope for positive impacts (uncertain) against SA objective 1, with introduction of new green landscaping helping to enhance adaptability of the estate to climate change (SA objective 2), as well as enhance the built environment (SA objective 3), and help create new habitat areas (SA objective 6). An enhanced built environment should strengthen the economy (SA objective 5). An uncertain effect on car journeys will be created because there is no reliable way to predict the net impact (SA objective 7). There will be an uncertain effect on infrastructure if vacancies fall, but it is expected that the predicted economic growth can be accommodated within the existing infrastructure (SA objective 8), although this may not be optimal.</p> <p>Flexibility for appropriate Non B Class Use development of a scale that complements and enhances the business function should help to promote economic function (SA objective 5), reduce car journeys (SA objective 7), promote cohesive communities and active lifestyles (SA objective 9).</p>		
Option 2: Manor Royal as the first choice location for business but no restrictions on non B Class uses, including retail and leisure, and no design requirements.	<ol style="list-style-type: none"> <li>1. To minimise climate change ?</li> <li>2. To adapt to climate change ?</li> <li>3. Protect/ enhance built environment - 0</li> <li>4. Ensure everyone has the opportunity to live in a decent and affordable home. -?</li> <li>5. Maintain/ support employment base +?</li> <li>6. Conserve/ enhance biodiversity habitats -? ? 0</li> <li>7. Reduce car journeys +?</li> <li>8. Ensure the provision of sufficient infrastructure</li> <li>9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles</li> </ol>		
<p><b>Commentary</b></p> <p>This approach would provide flexibility for a greater range of employment generating uses at Manor Royal, as identified in the NPPF. However, evidence identifies a clear demand for a significant amount of B Class employment land floorspace in Crawley over the plan period. With only a limited supply of employment land available, Manor Royal should be prioritised as a location for B Class employment uses, and that other employment typologies should only be permitted where it can be demonstrated that proposals would not undermine the business function of the estate.</p> <p>Further, an approach that is not consistent with the Manor Royal SPD does little to improve the overall environment at Manor Royal, and would not be seen as positively contributing to the overall setting of the business district, in regard to its public realm, aesthetic quality and overall investor confidence in the area as a 21<sup>st</sup> century business location. For these reasons, it is considered that Crawley is faced with unique circumstances that justify a more managed approach to development at Manor Royal. On this basis, Option 2 is not considered to represent the most sustainable way forward.</p> <p>Enhancement of Manor Royal as a business location will not necessarily create a net impact on climate change, but this is uncertain (SA objective 1). There is an uncertain effect on the Manor Royal from an enhanced retail and leisure offering within the Manor Royal, but this would undoubtedly create new jobs, just not in a way that meets with Manor Royal and Town Centre objectives (SA objective 5). An uncertain effect on car journeys will be created because there is no reliable way to predict the net impact</p>			

	of more leisure and less traditional business activity in the Manor Royal (SA objective 7). There will be an uncertain effect on infrastructure and this might be dependent on form of development (SA objective 8). There should be a positive impact on public health if leisure facilities are brought forward (SA Objective 9).		
Option 3: Manor Royal as the first choice for business, with no restrictions on non B uses classes including retail and leisure. The policy will draw upon the Manor Royal Design Guide SPD to achieve high landscaping design for key frontages and gateway sites.	1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home. 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	+? +? + 0 -? +? -? ? 0 +?	
<b>Commentary</b> <p>This approach would provide flexibility for a greater range of employment generating uses at Manor Royal, as identified in the NPPF. However, the Economic Growth Assessment has identified a clear demand for a significant amount of B Class employment floorspace in Crawley over the Plan period. With only a limited supply of employment land available, the evidence base identifies that Manor Royal should be prioritised as a location for B Class employment uses, and that other employment typologies should only be permitted where it can be demonstrated that proposals would not undermine the business function of the estate. For this reason, it is considered that to allow unrestricted non B Class employment uses across Manor Royal would undermine its business district function, contrary to the evidence set out within the Economic Growth Assessment.</p> <p>The approach would provide a policy hook for the Manor Royal Design Guide SPD, which is recognised as a key means of improving the overall Manor Royal environment, in terms of aesthetic appearance, usability, legibility, landscaping, and enhancement of biodiversity. However, without taking a managed approach to manage the economy through policy, there is risk that the overall business function of the estate may be lost.</p> <p>Therefore, it is considered that Crawley is faced with unique circumstances that justify a more managed approach to development at Manor Royal, and Option 3 is not considered to represent the most sustainable way forward.</p> <p>Environmental improvement through the Manor Royal SPD may have a positive (uncertain) impact on climate change minimisation and adaptation, because the economy might not perform well (SA objectives 1 &amp; 2) and also environmental improvements to the built environment (SA objective 3) and the creation new habitat areas (SA objective 6). There is an uncertain effect from enhanced retail and leisure in Manor Royal, but this undoubtedly creates new jobs, just not in a way that meets with Manor Royal and Town Centre objectives (SA objective 5). An uncertain effect on car journeys will be created because there is no reliable way to predict the impact of more leisure and less traditional business activity in Manor Royal (SA objective 7). There will be an uncertain effect on infrastructure and this might be dependent on the form of the development (SA objective 8). There should be a positive impact on public health if open space improvements and leisure facilities are brought forward (SA Objective 10).</p>			

<b>Policy EC10: Employment Development and Residential Amenity</b>			
<b>Policy Options</b>	<b>SA Objective with Significant Effect</b>	<b>Positive or Negative Impact</b>	<b>Mitigation of Negative Impacts</b>
Chosen Option	<b>Option:</b> Option 1 is chosen.		

Option 1: Update and roll forward the existing Local Plan policy.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 0 ++ ++ ++ 0 ? ? +	
<b>Commentary</b>			
<p>This approach retains the principle of the Manor Royal Buffer Areas, whilst seeking to ensure that the economic function of the Main Employment Areas is not constrained by inappropriate residential development. Include wording to ensure that protection is in place to manage the relationship in amenity terms between residential (existing and proposed) and employment uses.</p> <p>This policy option provides significant positive impacts to the protection and enhancement of the built environment (Objective 3) allowing for consideration to be given to individual proposals on a case-by-case basis and allowing for solutions to be found appropriate to the specific circumstances. Flexibility is provided within the policy wording to manage the relationship between employment and housing, so as to protect the amenity of adjacent residential areas whilst ensuring that the economic function of the Main Employment Area is not undermined by inappropriate residential development. This maintains consistency with the NPPF, Economic Growth Assessment, and other Local Plan policies and builds on the previous Local Plan buffer zones historically identified but allows wider operations dependent on a case-by-case basis rather than just purely B1 uses. Further, the policy affords enables existing buffer zones adjacent to Manor Royal to be retained and new considerations to be given based on the central government changes to permitted development for B1(a) to C3. Such an approach enables the relationship in amenity terms, between residential and main employment area, to be appropriately managed through the local plan, thereby promoting sustainable development. Policy flexibility ensures there is a positive impact against Objectives 4, 5 and 9. Impact against Objectives 7 and 8 are uncertain. It is considered there would be no impact on Objectives 1, 2, 6 with regards to this policy option.</p>			
Option 2: No policy in the Local Plan and rely on NPPF and Local Plan noise and general amenity policies.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and encourage active lifestyles	0 0 -? 0 ? 0 0 ? -?	Mitigation not required as no negative impacts identified.
<b>Commentary</b>			
<p>An approach relying on the NPPF other Local Plan policies would be manageable, but this fails to acknowledge the close proximity of Manor Royal to residential locations. There are a number of existing residential properties situated close to Manor Royal, and the buffer zones provide an important opportunity to manage the transition between the two areas. Further, this option would not provide certainty to prevent the inappropriate introduction of residential uses into employment areas. Therefore, it is considered that the option would not provide the certainty required to ensure that positive impacts on the Sustainability Objectives could be achieved.</p>			

Policy EC11: Neighbourhood Centres			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p><b>Option 2: Moderate Flexibility is the preferred policy approach.</b></p> <p>The neighbourhood centres are valued by residents and continue to perform an important function in meeting the day-to-day needs of local people. But it is recognised that the role of the parades is not limited solely to a convenience function, and the shops also accommodate specialist retailers in addition to other non-retail uses that support local needs. As such, the key objective of a neighbourhood parade policy will be to retain the balance between meeting local needs whilst providing flexibility for other appropriate uses.</p> <p>Option 2 is considered to represent the most appropriate balance, allowing flexibility for a range of retail and non-retail uses, whilst enabling the Local Planning Authority to assess the potential impact of any proposals on a parade by parade basis, having full regard to local circumstance. In doing so, the approach promotes a mix of uses in a sustainable neighbourhood parade location, and Option 2 is therefore the preferred approach.</p>		
Option 1: Low Flexibility: A percentage based approach to determine the proportion of non-retail uses permitted in neighbourhood parades.	<ol style="list-style-type: none"> <li>1. To minimise climate change</li> <li>2. To adapt to climate change</li> <li>3. Protect/enhance built environment</li> <li>4. Ensure everyone has the opportunity to live in a decent and affordable home.</li> <li>5. Maintain/ support employment base</li> <li>6. Conserve/enhance biodiversity, landscape, flora/fauna.</li> <li>7. Reduce car journeys</li> <li>8. Ensure the provision of sufficient infrastructure</li> <li>9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles</li> </ol>	- - ? ? -? 0 - - 0	
	<b>Commentary</b>	<p>This option would involve implementation of a percentage based approach that would seek to retain a balance between retail and non-retail uses in neighbourhood parades by allowing non-retail uses to take up no more than 50% frontage length of any one parade. The policy would broadly seek to limit non-retail uses to use classes A2, A3, or A5, though other uses that would support a local shopping trip will also be considered. Although Option 1 would help retain a retail focus at parades, there is risk that the approach is too prescriptive. This is particularly likely to be the case in smaller parades, where a single convenience retailer acts as a main anchor store, supported by non-retail uses. In such cases, the approach is likely to be too inflexible, potentially increasing vacancies and stifling the vitality and viability of the parade. By inflexibly restricting the number of non-retail uses, there is also risk that the approach may prevent non-retail uses which would otherwise be used by local residents from locating within a sustainable neighbourhood parade location, potentially increasing the need to travel by private car. For this reason, Option 1 is not considered to represent the most sustainable policy approach.</p> <p>By prescriptively setting out acceptable uses at neighbourhood parades there is risk that Option 1 reduces choice and therefore increases the need to travel, impacting negatively against Objectives 1, 2, 5, 7, 8, and 9. Local Plan policies SD1, ENV6, 7, 9, and 10 may help mitigate against some negative impacts. However, an approach that potentially harms the parades would be difficult to mitigate against in full.</p>	
Option 2: Moderate Flexibility: Change of use applications considered on individual merits having regard to the impact that a proposal would have on the parade's ability to meet	<ol style="list-style-type: none"> <li>1. To minimise climate change</li> <li>2. To adapt to climate change</li> <li>3. Protect/enhance built environment</li> <li>4. Ensure everyone has the opportunity to live in a decent and affordable home.</li> <li>5. Maintain/ support employment</li> </ol>	+ + + ? + 0	Mitigation not required as no negative impacts identified.

the everyday needs of residents.	<p>base</p> <p>6. Conserve/enhance biodiversity, landscape, flora/fauna.</p> <p>7. Reduce car journeys</p> <p>8. Ensure the provision of sufficient infrastructure</p> <p>9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles</p>	<p>+</p> <p>+</p> <p>+</p> <p>0</p>	
<b>Commentary</b>			
<p>This option would retain an approach similar to that employed in the 2015 Local Plan. Rather than identifying a maximum threshold of non-retail that would be permitted, flexibility is applied to enable the Local Planning Authority to consider the impacts of a proposal on its individual merits, allowing a view to be taken as to the overall impact on the ability of the parade to meet the everyday needs of residents. The approach would seek to support proposals for change of use, provided that these would not adversely affect the ability of the parade to cater for the day-to-day needs of residents, and would enhance the vitality and viability of the parade.</p> <p>It is considered that this approach has historically worked well in Crawley in providing flexibility for a range of uses whilst enabling officers to draw upon professional expertise to manage an overall balance of uses and ensure that the parade continues to meet the day-to-day needs of residents. By continuing to allow for a range of uses in an accessible locations, it is considered that the Option 2 approach represents a sustainable and pragmatic means of determining applications for neighbourhood parade change of use.</p>			
Option 3: High Flexibility: Implement a highly flexible approach with minimal policy restriction.	<p>1. To minimise climate change</p> <p>2. To adapt to climate change</p> <p>3. Protect/enhance built environment</p> <p>4. Ensure everyone has the opportunity to live in a decent and affordable home.</p> <p>5. Maintain/ support employment base</p> <p>6. Conserve/enhance biodiversity, landscape, flora/fauna.</p> <p>7. Reduce car journeys</p> <p>8. Ensure the provision of sufficient infrastructure</p> <p>9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles</p>	<p>-</p> <p>-</p> <p>?</p> <p>?</p> <p>-?</p> <p>0</p> <p>-</p> <p>-</p> <p>-</p> <p>0</p>	
<b>Commentary</b>			
<p>This option would take a highly flexible approach, not placing any restriction on the proportion of non-retail uses locating in neighbourhood centres. There is significant risk that option affords too great a level of flexibility, and in failing to refer to provide policy guidance to facilitate the vitality and viability of the parade, there is risk that the primary retail function of the parades may be eroded over time. Were this to be lost, residents would likely need to travel further to access the day-to-day services that are currently provided locally, potentially conflicting with the wider principles of sustainable development. There is risk that Option 3 is overly flexible, in that an unmanaged approach to the parades could erode the vitality and viability of their function over time.</p>			

Policy EC12: Rural Economy			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p><b>Option 1: Promote the rural economy where it is in keeping with the landscape character of its location and requiring goods to be primarily produced on the holding or neighbouring holdings.</b></p> <p>The chosen option and resulting policy is in line with the NPPF, as it sets out a policy approach to rural diversification that is supportive, whilst ensuring that such</p>		

	development respects its countryside location.		
Option 1: Promote the rural economy where it is in keeping with the landscape character of its location and requiring goods to be primarily produced on the holding or neighbouring holdings.	1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home. 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	+	Negative impact against Objective 5 may potentially be mitigated through locating rural economic development as close to residential areas as is practicable.
<b>Commentary</b>			
This option encourages farm shops in the countryside which is supported in National Policy but seeks to avoid farm shops which are not related to the farm or neighbouring farm on which it is proposed.			
Option 2: Encourage the rural economy, regardless of landscape character and use.	1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home. 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	- - 0 + 0 - 0 0 0	
<b>Commentary</b>			
This policy approach would be generally encouraging food shops in rural areas which may have harmful impacts on rural areas from transport movements and also risk these activities taking precedence over farming itself.			

## Gatwick Airport

Policy GAT1: Development of the Airport with a Single Runway			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<b>Option 1: Development of the Airport with a Single Runway.</b> The growth of the airport to cater for additional passengers within its current two terminal, one runway configuration can have a significant impact on a range of sustainability objectives including those relating to pollution, climate change, surface access, but also the social and economic through benefits to the local economy. The policy identifies the need for environmental and infrastructure mitigation to be in place alongside growth at the airport to appropriately support its operation. This is achieved through the S106 agreement between CBC/WSCC/GAL which sets out a range of obligations relating to mitigating the environmental impact of the airport on issues relating to noise, air quality, climate change and other environmental matters. Without the control of this policy and the associated S106 agreement the environmental impacts could be much greater. Overall, the policy seeks to support the growth of the airport in its current configuration,		

	and sets out that mitigation will be required where planning permission is needed. The policy also flags the possibility of GAL creating additional runway capacity at the Airport, likely through the bringing into commercial use of the standby runway (Scenario 2 of its draft master plan). This is not supported by the council, though any decision would come through a Development Consent Order as it would be represent Nationally Significant Infrastructure.		
Option 1: Enable the growth of the airport.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	- - 0  0 + -  -  0  +	Section 106 agreement with the airport operator which sets out on obligations relating to mitigating the environmental impact of the airport.
<b>Commentary</b> The operation of an international airport will invariably have a negative impact on the environment as air travel causes pollution, though it does also make a significant contribution to the employment base in the borough. The policy and S106 agreement will help ensuring that environmental impacts are mitigated as far as possible. Provisions for the revision of the S106 agreement also help ensure that the latest technological safeguards are considered to help mitigate the environmental impact of the airport. Part of the S106 agreement seeks to increase the proportion of passengers coming by public transport to help minimise the number of journeys made by car to the airport.			
Option 2: Assess applications against general planning policies.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	-- -- 0  0 +  /  -  +  0	S106 would remain in place without a dedicated policy, but referring to the legal agreement in policy is helpful.
<b>Commentary</b> The alternative to assessing applications against a specific Gatwick policy is to rely on general planning policies elsewhere in the plan. This could mean that the growth of the airport has a greater environmental impact by not allowing the specific environmental issues surrounding the growth of the airport to be fully considered. Through having a specific Gatwick Airport related policy in place, the impacts of airport growth, where planning permission is required, can be better mitigated.			

Policy GAT2: Safeguarded Land			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<b>Option 1: Safeguard land for future runway growth.</b> Since 2003, government policy has required the council to safeguard land to the south of the airport for a possible second runway. The Aviation green paper advises that it would be prudent to safeguard land, where there is robust evidence. Option 1 would therefore continue to safeguard land. The safeguarding of this land effectively rules out any major development within the safeguarded area, meaning that the land cannot be used to accommodate Crawley's significant unmet employment land needs. It would however mean that Gatwick Airport could more readily implement its draft		

	master plan Scenario 3, should the Government identify a need for further runway capacity.		
Option 1: Safeguard land for future runway growth.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient Infrastructure 9. Promote sustainable communities and Encourage active lifestyles	? ? ? 0 ? -- ? - 0	If a further runway were to be built at Gatwick, the necessary environmental safeguards should be in place to mitigate the environmental impact as far as possible. This could be achieved through a new S106 agreement.
<b>Commentary</b> The safeguarding policy restricts development in the safeguarded area which may be incompatible with the future development of a second runway. By minimising the amount of development in the area it is difficult to assess the impact of the policy. The key impact is that much needed employment land would continue to be unavailable should safeguarding be retained, and safeguarding could also impact on the delivery of other infrastructure, for example a relief road. As the policy is not as such allocating land for a further runway the assessment is not based on that of the impact of further runway growth in the safeguarded land. It should be noted that the final Aviation White Paper may be clearer in requiring the council to safeguard land, in which case Option 1 would have to be the one taken forward.			
Option 2: Delete Policy (do not safeguard land)	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient Infrastructure 9. Promote sustainable communities and Encourage active lifestyles	- -0 + 0 ++ -- - ++ +0	Were safeguarding to be lifted, any strategy development within the newly released land would need to be assessed. Development could include sustainability measures, but would invariably create travel movements and result in the loss of significant green space.
<b>Commentary</b> The government's draft Aviation Strategy does not give a clear steer as to whether or not land should continue to be safeguarded at Gatwick Airport. Crawley has a significant need for new employment land, and were safeguarding to be lifted, the council would be able to consider appropriate land uses across the whole area, potentially through an Area-wide Action Plan. Individual applications in this area in advance of the conclusion of that work will be considered to be premature. Strategic development of this nature would of course have its own sustainability implications, as new employment will also result in increased traffic movements and environmental considerations such as noise and air quality. It should be noted that the final Aviation White Paper may be clearer in requiring the council to safeguard land, in which case Option 1 would have to be the option taken forward.			

Policy GAT3: Gatwick Airport Related Parking			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<b>Option 1: To provide additional car parking within the airport boundary.</b> As passenger throughput at the airport grows, this will mean more passengers travelling by car even if the proportion of passengers using public transport increases.		

	<p>It is recognised that there are negative environmental impacts associated with car journeys being made, and this policy seeks to ensure (as required by the S106 legal agreement) that the volume of car parking is commensurate with the achievement of the public transport target for passenger journeys. The Gatwick Airport Surface Access Strategy sets out how the airport seeks to maintain and subsequently increase the proportion of passengers using public transport. The provision of additional car parking on airport minimises the distance travelled by the passenger in travelling between the car park and the airport terminals. This is therefore considered to have a lesser impact than additional sites for car parking which are located further away from the airport. This position has been endorsed through a series of planning inquiries.</p>		
Option 1: To provide additional car parking within the airport boundary.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	- - 0 / 0 -- / 0	
<p><b>Commentary</b></p> <p>The provision of airport car parking will generate car journeys which can have an impact on objectives relating to reducing the use of the car and climate change. However, the policy seeks to ensure that the growth of car parking provision is based on demonstrable need in the context of the overall strategy for increasing the proportion of passengers using public transport. This should help minimise the level of the impact.</p>			
Option 2: To allow car parking in other areas.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	-- -- 0 0 / - -- / 0	
<p><b>Commentary</b></p> <p>The alternative option considered was to relax current airport related car parking requirements and allow off-site parking provision. However, this is likely to encourage users to access Gatwick by car and is a less sustainable option than on-airport parking. Further it can detract from biodiversity and landscaping, frequently requiring significant hardstanding and lighting, and places pressure on land which could be more beneficially used for other users.</p>			

Policy GAT4: Employment Uses at Gatwick			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	The direct impact of the use of office floorspace at the airport is similar whether it is used for an airport related use or not. However, there could be an additional		

	environmental impact if addition office provision had to be made in the future to meet the needs of uses that required an on airport location for operational reasons. Therefore in the long term it is considered appropriate to assess the need for floorspace on a case by case basis as the most sustainable option.		
Option 1: Assessing the impact of the loss of floorspace.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 0 0 / + 0 0 0 0	
<p><b>Commentary</b></p> <p>The use of office floorspace at the airport whether it is for an airport related use or a non-airport related use will have the same direct impact in that it can make a contribution to the employment base and benefit from the good transport links. However, if this subsequently meant the provision of additional new office floorspace to meet the needs of airport related uses which have to be located on airport for operational reasons then there could be the additional loss of previously undeveloped land and its associated environmental impacts.</p>			
Option 2: Allowing office floorspace to be used by non-airport related uses without assessing need.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 0 0 0 / 0 + 0 0	
<p><b>Commentary</b></p> <p>As above the use of office floorspace by non-airport related uses has the same direct impact as airport related uses. However, it is the consequences of the possibility in the future of not being able to provide for airport related uses within existing floorspace which need to be considered.</p>			

## Crawley Town Centre

<b>Policy TC1: Primary Shopping Area</b>			
<b>Policy Options</b>	<b>SA Objective with Significant Effect</b>	<b>Positive or Negative Impact</b>	<b>Mitigation of Negative Impacts</b>
Chosen Option		<b>Option 2: Primary Frontage Flexibility, Fully Flexible Secondary Frontage.</b>	
Option 1: Fully Flexible Frontages	1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment	0 0 -?	

	<p>4. Ensure everyone has the opportunity to live in a decent and affordable home.</p> <p>5. Maintain/ support employment base</p> <p>6. Conserve/enhance biodiversity habitats</p> <p>7. Reduce car journeys</p> <p>8. Ensure the provision of sufficient infrastructure</p> <p>9. Healthy, active, cohesive and socially sustainable communities and encourage active lifestyles</p>	<p>-</p> <p>-?</p> <p>0</p> <p>0</p> <p>?+</p> <p>+?</p>	
<b>Commentary</b>			
Option 2: Managed Primary Frontage Flexibility, Fully Flexible Secondary Frontage.	<p>1. To minimise climate change</p> <p>2. To adapt to climate change</p> <p>3. Protect/enhance built environment</p> <p>4. Ensure everyone has the opportunity to live in a decent and affordable home.</p> <p>5. Maintain/ support employment base</p> <p>6. Conserve/enhance biodiversity habitats</p> <p>7. Reduce car journeys</p> <p>8. Ensure the provision of sufficient infrastructure</p> <p>9. Healthy, active, cohesive and socially sustainable communities and Encourage</p>	<p>0</p> <p>0</p> <p>+?</p> <p>+</p> <p>++</p> <p>0</p> <p>++</p> <p>+</p> <p>++</p> <p>+</p>	Mitigation not required as no negative impacts identified.
<b>Commentary</b>			
This approach would involve the continuation of the 2015 Local Plan two-tiered retail frontage policy, with designated primary and secondary frontages. It sets out clear guidelines as to which uses are acceptable in primary frontages (A1, A2, A3), though would not place limits restricting the proportion of non-retail uses allowed on a given frontage. For secondary frontages, greater policy flexibility is afforded to encourage all proposals within use classes A1-A5 (inclusive). For all frontages, proposals for other main town centre uses will be considered on their individual merits, having regard to their impact on the overall vitality and viability of the town centre. This approach has helped to facilitate a reduction in the amount of vacant town centre units since its adoption, and it is considered to represent the most economically sustainable and pro-active way forward, and is considered to represent the preferred option.			

<b>Policy TC2: Town Centre Neighbourhood Facilities</b>			
<b>Policy Options</b>	<b>SA Objective with Significant Effect</b>	<b>Positive or Negative Impact</b>	<b>Mitigation of Negative Impacts</b>
Chosen Option	<b>Option:</b> Option 1 is the chosen option...		

Option 1: A Local Plan policy dedicated to supporting town centre facilities and services to meet the needs of a growing town centre residential population.	1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home 5. Maintain/support employment base 6. Conserve/enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	+ +? + + + 0 + ++ ++	
<b>Commentary</b> The number of residents living in the Town Centre has significantly increased, and from a starting point of 214 residential units in 2014, and through both planned development and prior approval schemes there are now 831 dwellings in the Town Centre. It is anticipated that, over the Plan period to 2035, a further 2,200 dwellings will come forward in the Town Centre, bringing the total to just over 3,000 residential units. The Town Centre does not offer the community services and facilities that are provided within Crawley's residential neighbourhoods, for example schools, open space, health. Given the increasing residential population living in the town centre, it will be important to ensure that the facilities and services required to support the day-to-day needs of a growing Town Centre residential population are in place. Whilst it is possible that without a Local Plan policy, some of the facilities and services needed to support the Town Centre residential population may come forward through the market, some of these uses are not identified in the NPPF as main town centre uses, for example community facilities, and therefore national policy would not necessarily help address some requirements.			
Option 2: Rely on more general local plan policies to support the delivery of supporting town centre facilities and services to meet the needs of a growing town centre residential population.	1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home 5. Maintain/support employment base 6. Conserve/enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	0 0 ? ? ?+ 0 - - -	
<b>Commentary</b> Without a Local Plan Policy, it will be challenging to ensure that residential development in the Town Centre comes forward in a well-planned and designed manner that contributes positively to Town Centre vitality and viability and people's quality of life. It would not be possible to secure, where planning permission is required, developer contributions towards the infrastructure and services required to support the Town Centre residential population. Whilst it is possible that without a			

	Local Plan, some of the facilities and services needed to support the Town Centre residential population may come forward through the market. However, some of these uses are not identified in the NPPF as main town centre uses, for example community facilities, and therefore national policy would not necessarily help address some requirements.
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<b>Policy TC3: Development Sites within the Town Centre Boundary</b>			
<b>Policy Options</b>	<b>SA Objective with Significant Effect</b>	<b>Positive or Negative Impact</b>	<b>Mitigation of Negative Impacts</b>
Chosen Option	<b>Option 2: Roll forward Local Plan allocations, and identify additional allocations. Provide flexible policy guidance to facilitate delivery.</b> The chosen policy approach (Option 3) identifies and allocates a number of sustainable town centre and edge-of-centre sites for mixed-use development. This approach provides greater certainty and status to sites through the formal allocation process, whilst providing flexibility to support a range of residential, main town centre, and supporting neighbourhood uses.		
Option 1: Roll forward Local Plan allocations, and identify new allocations. Provide prescriptive policy guidance to detail appropriate uses for each allocation.	1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home. 5. Maintain/ support employment base 6. Conserve/enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	+ + +? + +? 0 +? + +	Mitigation not required as no negative impacts identified.
<b>Commentary</b> This approach would involve the roll forward of existing allocations in addition to identifying new allocations from the Town Centre SPD and scoping of any possible sites through the Strategic Housing Land Availability Assessment (SHLAA). Through retaining existing and identifying new allocations, this approach provides an opportunity to deliver homes, jobs, and leisure provision (meeting Sustainability Objectives 4, 5 and 10, depending upon development type). An increased allocation of sustainable town centre and edge-of- centre mixed-use development sites also supports the reduction of car journeys (objective 7) and promotes sustainable communities (objective 9). Through CIL, this option will also ensure the provision of sufficient infrastructure (objective 8). Through the allocation of an increased number of sites, this option is capable of meeting demand for town centre uses including retail, employment, leisure and residential, as required under NPPF paragraph 23. It is, however, recognised that ensuring the viability and deliverability of sites remains a key NPPF objective, and there is risk that too prescriptive a requirement for each allocation could deter delivery. For this reason, it is considered that an element of flexibility should be incorporated into policy to maximise the scope for delivery, and therefore, Option 1 is not considered to represent the most sustainable way forward.			
Option 2: Roll forward Local Plan allocations, and identify additional allocations. Provide flexible policy guidance to facilitate delivery.	1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home. 5. Maintain/ support employment base 6. Conserve/enhance	+ + ++ ++ ++ ++	Mitigation not required as no negative impacts identified

	biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	0 ++ + ++	
<b>Commentary</b>			
<p>This approach would involve the roll forward of existing Local Plan allocations, in addition to identifying new allocations from the Town Centre SPD and through the SHLAA. Through identifying unimplemented and new allocations, this option provides greater opportunity to deliver homes, jobs, and leisure provision (meeting Sustainability Objectives 4, 5 and 10, depending upon the development type). An increased allocation of sustainable town centre and edge-of-centre mixed-use development sites also supports the reduction of car journeys (SA Objective 7) and promotes sustainable communities (SA Objective 9). Through developer contributions, this option can also ensure the provision of sufficient infrastructure (SA Objective 8).</p> <p>Through the allocation unimplemented and new sites, this option is best placed to meet demand for town centre uses, residential and supporting neighbourhood facilities.</p> <p>It is, however, recognised that ensuring the viability and deliverability of sites remains a key objective, and it is considered that by incorporating scope for the flexibility of different uses, this policy meets the NPPF objectives, and therefore, represents a more sustainable policy approach than Option 1.</p>			
<b>Policy TC4: Active and Engaging Frontages</b>			
<b>Policy Options</b>	<b>SA Objective with Significant Effect</b>	<b>Positive or Negative Impact</b>	<b>Mitigation of Negative Impacts</b>
Chosen Option	<b>Option 2 is chosen</b>		
Option 1: rely on general design policies of the Local Plan and the NPPF.	1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home 5. Maintain/support employment base 6. Conserve/enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	?+ ?+ + 0 0 0 0 0 +	
<b>Commentary</b>			
<p>With the Local Plan encouraging a range of main town centre uses, and being supportive of neighbourhood facilities, residential and mixed-use development, there is a need to ensure development is carefully planned and designed to engage and interact positively with the public realm. To achieve this, Option 1 would rely solely on the general design policies of the Local Plan.</p>			
Option 2: Prepare policy to provide specific guidance to achieve active and engaging frontages in the town	1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment	?+ ?+ ++	

centre, building upon general design guidance, policies and NPPF.	environment 4. Ensure everyone has the opportunity to live in a decent and affordable home 5. Maintain/support employment base 6. Conserve/enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	0 0 0 0 0 ++	
<b>Commentary</b> With the Local Plan encouraging a range of main town centre uses, and being supportive of neighbourhood facilities, residential and mixed-use development, there is a need to ensure development is carefully planned and designed to engage and interact positively with the public realm. To achieve this, Option 2 would introduce a specific policy to ensure that ground floor development in the Town Centre adds to its overall vitality and viability through the provision of active and engaging frontages, building upon the general design policies of the Local Plan.			

Policy TC5: Town Centre First			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<b>Option 2: Local Plan policy that supports the town centre first approach, with interpretation of NPPF town centre policy at the local level.</b> Although it is recognised that in promoting the town centre first approach, Option 1 represents a sustainable option, it is considered that Option 2 enables greater scope to take into account locally specific issues. In particular, a locally specific policy enables acknowledgement to be made within the policy to the function of existing the existing out-of-centre retail locations as a focus for retail, subject to sequential and impact testing, whilst recognising that these are not defined as centres. This enables the town centre first approach to be best applied through policy at the local level, and Option 2 is therefore considered to represent the most sustainable approach.		
Option 1: Rely on the NPPF to apply the town centre first approach.	1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home. 5. Maintain/ support employment base 6. Conserve/enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	+ + + 0 + 0 + + +	Mitigation not required as no negative impacts identified
	<b>Commentary</b> Option 1 would rely on the NPPF to apply the town centre first approach. Whilst this would enable the local planning authority to draw upon national policy to direct retail and leisure development to the most sustainable locations, it would not enable NPPF policy to be expanded upon at the local level. As such, although Option 1 represents a sustainable approach, the greater scope for local policy interpretation		

	provided by Option 2 is considered to represent a more sustainable approach.		
Option 2: Develop a local plan policy to support the town centre first approach and interpretation of NPPF retail policy at the local level.	1. To minimise climate change 2. To adapt to climate change 3. Protect/ enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home. 5. Maintain/ support employment base 6. Conserve/enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	++ + ++ 0 ++ 0 ++ + +	Mitigation not required as no negative impacts identified
<b>Commentary</b>			
<p>Option 2 would take the form of a locally specific policy that builds upon the town centre first approach of the NPPF whilst having regard to local circumstance.</p> <p>This enables the policy to identify existing out-of-centre locations as the focus for out-of-centre retail proposals, though would not define these locations as formal retail centre, and applications would need to satisfy the sequential and impact tests. As such, it supports the promotion of a vital and viable town centre, whilst enabling the development of identified edge-of-centre locations, and out-of-centre locations, only where it can be demonstrated that proposals would not impact on the vitality and viability of the town centre as existing or planned. Through this approach, there is consistency with the other employment policies set out within the Local Plan, including the Policy EC9 focus on promoting business-led growth at Manor Royal. In directing retail development to a sustainable town centre location, before considering locations beyond the town centre, Option 2 actively promotes the principles of sustainable development, particularly in terms of reducing car journeys, promoting healthy active communities, and minimising climate change. For these reasons, Option 2 is considered to represent the most sustainable policy approach.</p>			

## Housing

Policy H1: Housing Provision			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p><b>Option 4: 'Supply-led' locally determined housing requirement (minimum of 320 dwellings p.a. over period 2020-2035, stepped as a 451 requirement over years 1-5 and 255 in years 6-15) with 'unmet need' expressed.</b></p> <p>A supply-led housing figure is recommended in view of the constrained nature of the borough in terms of land supply. It is considered that annual provision significantly above these levels could not be sustained over the Plan period to 2035, as informed by the council's urban capacity, open space, economic growth and transport modelling work.</p> <p>Mitigation of negative impact on SA Objective 4 (Opportunity to live in a decent and affordable home) is provided by establishing the amount of unmet need arising from the borough within the policy and identifying the scope of work required by the council to ensure this need is met within sustainable and accessible locations suitable for residents of Crawley. This is expected to be achieved through effective Duty to Cooperate working across the Housing Market Area and with ongoing wider partnership workings to ensure the delivery of sufficient housing in the mid to longer term where this is in accordance with other sustainable planning policies.</p>		
Option 1: Housing requirement based on the	1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built	0 - --	

<p>Government's standard method for calculating housing need, including the cap (476 dwellings p.a.).</p>	<p>environment</p> <p>4. Everyone has opportunity to live in a decent and affordable home</p> <p>5. Maintain/support employment base</p> <p>6. Conserve/ enhance biodiversity and landscape</p> <p>7. Reduce car journeys, sufficient transport infrastructure</p> <p>8. Ensure the provision of sufficient infrastructure</p> <p>9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles</p>	<p>+</p> <p>-</p> <p>--</p> <p>-</p> <p>0</p> <p>--</p>	
<p><b>Commentary</b></p> <p>A housing figure derived from the government's Standard Method, including the 40% cap on the existing Local Plan requirement, would have the most positive impact on sustainability objective 4, ensuring everyone has the opportunity to live in a decent and affordable home. However, it would have a significant negative impact on SA objectives 3 and 6 in view of the amount and nature of land that would have to be developed to provide housing at this level over the Plan period.</p> <p>SA objectives 1 and 8 were ruled out on the basis that they are not specifically related to overall levels of housing provision.</p> <p>Development at this level is considered would have a significant negative impact on Criteria 9, as it would require substantial loss of open space sites identified through Local Plan evidence as being critical in their function for the town and encouraging healthy lifestyles, in terms of their quantity, quality and accessibility to the borough's residents, employees and visitors. Pressures would also be placed on the existing formal health infrastructure providers, which in some neighbourhoods are already</p>			
<p>Option 2: Affordable housing needs locally determined housing requirement (minimum of 527 dwellings per annum). These figures to be revised with data from updated SHMA.</p>	<p>1. To minimise climate change</p> <p>2. To adapt to climate change</p> <p>3. Protect/enhance built environment</p> <p>4. Everyone has opportunity to live in a decent and affordable home</p> <p>5. Maintain/ support employment base</p> <p>6. Conserve/ enhance biodiversity and landscape</p> <p>7. Reduce car journeys, sufficient transport infrastructure</p> <p>8. Ensure the provision of sufficient infrastructure</p> <p>9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles</p>	<p>0</p> <p>--</p> <p>--</p> <p>++</p> <p>-</p> <p>--</p> <p>--</p> <p>0</p> <p>--</p>	
<p><b>Commentary</b></p> <p>An affordable housing based figure would have the most positive impact on sustainability objective 4, ensuring everyone has the opportunity to live in a decent and affordable home in terms of meeting the housing needs of the borough as identified through the SHMA. However, it would have a significant negative impact on SA Objective 2, adaptation to climate change, Objective 3, protection and enhancement of the built environment, Objective 6, conservation and enhancement of biodiversity and Objective 7, reducing car journeys and promoting sustainable transport, in terms of the amount of housing required over the Plan period to fully meet affordable housing needs.</p> <p>SA objectives 1 and 8 were ruled out on the basis that they are not specifically related to overall levels of housing provision.</p> <p>Development at this level is considered would have a significant negative impact on Criteria 9, as it would require substantial loss of open space sites identified through Local Plan evidence as being critical in their function for the town and encouraging healthy lifestyles, in terms of their quantity, quality and accessibility to the borough's</p>			

	residents, employees and visitors. Pressures would also be placed on the existing formal health infrastructure providers, which in some neighbourhoods are already performing at, over, or close to, capacity.		
Option 3: 'Supply-led' locally determined housing requirement (minimum of 320 dwellings p.a. over period 2020-2035, stepped as a 451 requirement over years 1-5 and 255 in years 6-15).	1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment 4. Everyone has opportunity to live in a decent and affordable home 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity habitats 7. Reduce car journeys, sufficient transport infrastructure 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	0 + + - + + + 0 0	
<b>Commentary</b> A supply-led housing figure is recommended in view of the constrained nature of the borough in terms of land supply. It is considered that annual provision above these levels could not be sustained over the plan period, as informed by the council's urban capacity and transport modelling work. However, it is acknowledged that such an approach, which involves providing housing at levels significantly below demographic requirements, will have a negative impact on Sustainability Objective 4, to ensure everyone has the opportunity to live in a decent and affordable home. The impact on Sustainability Objectives 2, 3, 6, and 7 are deemed to be positive, in terms of impact on the natural and built environment including water resource management and transport infrastructure.			
Option 4: 'Supply-led' locally determined housing requirement (minimum of 320 dwellings p.a. over period 2020-2035, stepped as a 451 requirement over years 1-5 and 255 in years 6-15) with 'unmet need' expressed.	1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment 4. Everyone has opportunity to live in a decent and affordable home 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity and landscape 7. Reduce car journeys, sufficient transport infrastructure 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	0 + + +? + + + 0 0	Mitigation of the potential negative impact on SA 4 (Opportunity to live in a decent and affordable home) is provided by establishing the amount of unmet need arising from the borough within the policy and identifying the scope of work required by the council to ensure this need is met within sustainable and accessible locations suitable for residents of Crawley. This is expected to be achieved through effective Duty to Cooperate working across the Housing Market Area and with ongoing wider partnership workings to ensure the delivery of sufficient housing in the mid to longer term where this is in accordance with other sustainable planning policies.
<b>Commentary</b> A supply-led housing figure is recommended in view of the constrained nature of the borough in terms of land supply. It is considered that annual provision above these levels could not be sustained over the Plan period, as informed by the council's urban capacity and transport modelling work. However, it is acknowledged that such an approach, which involves providing housing at levels significantly below demographic requirements, will have a negative impact on Sustainability Objective 4: to ensure everyone has the opportunity to live in a decent and affordable home. In this option, this is mitigated by acknowledging the level of unmet need within the Policy and clarifying how this will continue to be addressed. Whilst the ability to deliver the housing levels required outside of the borough's administrative boundaries remains beyond the control of the council, by setting this out in the Policy neighbouring authorities, in the preparation of their development plans, will have a clear indication of the scale and expectations relating to Crawley's housing needs.			

The impacts on Sustainability Objectives 2, 3, 6, and 7 are deemed to be positive, in terms of impact on the natural and built environment including water resource management and transport infrastructure.

Policy H2: Key Housing Sites			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p><b>Option 3: Identify specific 'deliverable' and 'developable' housing sites to meet Crawley's housing requirements over the Plan period (2020-2035) and provide more detailed criteria for specific housing sites.</b></p> <p>A policy which identifies a series of deliverable and developable housing sites and broad locations to meet the supply-led housing requirement identified in Policy H1 is required to demonstrate how this figure can be delivered over the plan period to 2035. Para 67 of the NPPF identifies that local plans should identify key sites which are critical to the delivery of their housing requirement, including a supply of specific 'deliverable' sites to provide 5 years' worth of housing and specific 'developable' housing sites or broad locations for growth, for years 6-10, should also be identified and where possible, for years 11-15.</p>		
Option 1: Not identifying a series of deliverable and developable housing sites to meet Crawley's housing needs.	<ol style="list-style-type: none"> <li>1. To minimise climate change</li> <li>2. To adapt to climate change</li> <li>3. Protect/enhance built environment</li> <li>4. Everyone has opportunity to live in a decent and affordable home</li> <li>5. Maintain/ support employment base</li> <li>6. Conserve/ enhance biodiversity and landscape</li> <li>7. Reduce car journeys, sufficient transport infrastructure</li> <li>8. Provision of sufficient infrastructure to meet the requirements of the borough.</li> <li>9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles</li> </ol>	0 - - ? 0 - - - - -	Commentary  Allowing the market to determine the location of future housing development without any guidance from the local plan in terms of the most (and least) appropriate locations would have a negative impact on each of the relevant sustainability objectives (2,3,6,7,8 and 9). This is largely because it would limit the control of the local planning authority to steer housing development towards the most appropriate locations and away from inappropriate locations such as flood zones, open space, Ancient Woodland and areas which are unrelated to the existing neighbourhood form and structure, such as outside the Built Up Area.  SA objectives 1 and 5 were ruled out on the basis that they are not specifically related to the location of future housing development.
Option 2: Identify specific 'deliverable' and 'developable' housing sites to meet Crawley's housing requirements over the Plan period (2020-2035).	<ol style="list-style-type: none"> <li>1. To minimise climate change</li> <li>2. To adapt to climate change</li> <li>3. Protect/enhance built environment</li> <li>4. Everyone has opportunity to live in a decent and affordable home</li> <li>5. Maintain/ support employment base</li> <li>6. Conserve/ enhance biodiversity and landscape</li> <li>7. Reduce car journeys, sufficient transport</li> </ol>	0 + + + 0 + +	

	<p>infrastructure</p> <p>8. Provision of sufficient infrastructure to meet the requirements of the borough.</p> <p>9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles</p>	<p>+</p> <p>+</p>	
<b>Commentary</b>			
<p>The application of this policy will have a positive impact on SA Objective 2 in terms of adaptation to the effects of climate change particularly in respect of flooding and effective management of water resources, Objective 3 (Protection and Enhancement of the Built Environment and Character), Objective 6 (Conservation and Enhancement of Biodiversity and Key Landscape Features) Objective 7 (Reduction in car journeys and promotion of sustainable methods of transport) and Objectives 8 and 9 to ensure the provision of sufficient infrastructure to meet the borough's requirements and promotion of healthy, active and mixed communities.</p> <p>SA objectives 1 and 5 were ruled out on the basis that they are not specifically related to the location of future housing development.</p> <p>Development sites identified for allocation include some existing open space sites, however, these have been allocated for housing and open space and include requirements for improvements to the remaining open space and outdoor recreation facilities this will ensure there is a neutral impact.</p>			
Option 3: Identify specific 'deliverable' and 'developable' housing sites to meet Crawley's housing requirements over the Plan period (2020-2035) and provide more detailed criteria for specific housing sites.	<p>1. To minimise climate change</p> <p>2. To adapt to climate change</p> <p>3. Protect/enhance built environment</p> <p>4. Everyone has opportunity to live in a decent and affordable home</p> <p>5. Maintain/ support employment base</p> <p>6. Conserve/ enhance biodiversity and landscape</p> <p>7. Reduce car journeys, sufficient transport infrastructure</p> <p>8. Provision of sufficient infrastructure to meet the requirements of the borough.</p> <p>9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles</p>	<p>0</p> <p>+</p> <p>+</p> <p>+</p> <p>0</p> <p>+</p> <p>+</p> <p>+</p> <p>++</p>	<p>Mitigation not required as no negative impacts identified.</p> <p>The Open Space Assessment, and correlating Local Plan allocation requirements for mitigation, ensures that the housing allocations on open space sites will not result in a negative impact on healthy, active lifestyles through requirements for provision of access to good quality outdoor sport and play space.</p> <p>Impacts on heritage and biodiversity must be mitigated against through strong design and management criteria.</p> <p>Needs of older people can be helped to be met through the specific allocation of a housing site for older people's accommodation.</p>
<b>Commentary</b>			
<p>By providing more detail within the Policy in relation to some of the sites which have particular constraints or opportunities, the application of this policy will have a positive impact on SA Objective 2 in terms of adaptation to the effects of climate change particularly in respect of flooding and effective management of water resources, Objective 3 (Protection and Enhancement of the Built Environment and Character), Objective 6 (Conservation and Enhancement of Biodiversity and Key Landscape Features) Objective 7 (Reduction in car journeys and promotion of sustainable methods of transport) and Objectives 8 and 9 to ensure the provision of sufficient infrastructure to meet the borough's requirements and promotion of healthy, active and mixed communities.</p> <p>SA objectives 1 and 5 were ruled out on the basis that they are not specifically related to the location of future housing development.</p> <p>Development sites identified for allocation include some existing open space sites. However, as these have been allocated for housing and open space and include requirements for improvements to the remaining open space and outdoor recreation facilities this will ensure there is a neutral impact. One of the allocation sites is likely to have some negative impact on the site specific nature conservation and heritage assets. Mitigation against this will be achieved by including detailed criteria and linking it to the preparation of a development brief.</p> <p>Evidence has indicated a need for provision of specialist housing to meet the needs of older people. One site can be allocated for this purpose and helps support the</p>			

principle of ensuring some offer is provided within the borough over the Plan period.

Policy H3: Housing Typologies			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<b>Option 1: Include an overarching residential 'typology' policy, setting general key design/amenity/ operational requirements for new residential developments.</b> Option 1 is considered to be preferable owing to the additional benefits in terms of protection of the living environment experienced by existing and future residents.		
Option 1: Include an overarching residential 'typology' policy, setting general key design/amenity/ operational requirements for new residential developments.	10. To minimise climate change 11. To adapt to climate change 12. Protect/enhance built environment 13. Ensure everyone has the opportunity to live in a decent and affordable home 14. Maintain/support employment base 15. Conserve/ enhance biodiversity and landscape 16. Reduce car journeys 17. Ensure the provision of sufficient infrastructure 18. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	0 +? ++ + 0 ++ 0 ? ++	Mitigation not required as no negative impacts identified.
	<b>Commentary</b> This policy is not considered to have negative impacts on any of the Sustainability Objectives. The benefits relate specifically to those related to the quality and liveability of the environment which people inhabit, i.e. protection/enhancement of the built environment, quality of accommodation, landscape conservation/ enhancement and a healthy living environment. The benefits associated with this policy include its capacity to operate as an overarching policy in relation to policies relating to specific 'typologies', as proposed in policies H3a to H3g.		
Option 2: Do not include a general typology policy, and rely on wider design/ standards/ amenity policies to ensure appropriate development.	10. To minimise climate change 11. To adapt to climate change 12. Protect/enhance built environment 13. Ensure everyone has the opportunity to live in a decent and affordable home 14. Maintain/support employment base 15. Conserve/ enhance biodiversity and landscape 16. Reduce car journeys 17. Ensure the provision of sufficient infrastructure 18. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	0 +? + + 0 + 0 ? +	
	<b>Commentary</b> To some extent the other policies in the Plan can be relied on to provide the kind		

	of sustainability benefits in terms of quality of living environment which are being pursued by this policy, and there are not considered to be negative impacts associated with relying on them alone.
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<b>Policy H3a: Housing Typologies: Estate Regeneration</b>			
<b>Policy Options</b>	<b>SA Objective with Significant Effect</b>	<b>Positive or Negative Impact</b>	<b>Mitigation of Negative Impacts</b>
Chosen Option	<b>Option 1: Include a specific 'typology' policy for Estate Regeneration.</b> Option 1 is considered to be preferable owing to the additional benefits in terms of protection of the living environment and community cohesion experienced by existing and future residents.		
Option 1: Include a specific 'typology' policy for Estate Regeneration.	1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home 5. Maintain/support employment base 6. Conserve/ enhance biodiversity and landscape 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	+ + ++ ++ 0 / 0 ++ ++	Mitigation not required as no negative impacts identified.
<b>Commentary</b> This option is considered to have no negative impacts and to have positive impacts across those sustainability indicators relating to the quality and environmental performance of homes, the wider living environment, and the promotion of cohesive and socially sustainable communities.			
Option 2: Do not include a specific policy for this 'typology', and rely on wider policies to regulate this form of development.	1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home 5. Maintain/support employment base 6. Conserve/ enhance biodiversity and landscape 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	+? + + + 0 / 0 + ++	
<b>Commentary</b> To some extent the other policies in the Plan can be relied on to provide the kind of sustainability benefits in terms of quality of living environment and community cohesion which are being pursued by this policy, and there are not considered to			

	be negative impacts associated with relying on them alone.		
<b>Policy H3b: Housing Typologies: Densification, Infill Opportunities and Small Sites</b>			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<b>Option 1: Include a specific 'typology' policy for Infill Opportunities and Small Sites.</b> Option 1 is considered to be preferable owing to the additional benefits in terms of protection of the living environment and biodiversity/landscape experienced by existing and future residents.		
Option 1: Include a specific 'typology' policy for Infill Opportunities and Small Sites.	1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home 5. Maintain/support employment base 6. Conserve/ enhance biodiversity and landscape 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	0 / ++ + 0 ++ 0 0 +	Mitigation not required as no negative impacts identified.
<b>Commentary</b> This option is considered to have no negative impacts and to have positive impacts across those sustainability indicators relating to housing provision, the quality of the living environment, and the promotion of sustainable communities.			
Option 2: Do not include a specific policy for this 'typology', and rely on wider policies to regulate this form of development.	1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home 5. Maintain/support employment base 6. Conserve/ enhance biodiversity and landscape 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	0 / + + 0 + 0 0 +	
<b>Commentary</b> To some extent the other policies in the Plan can be relied on to provide the kind of sustainability benefits in terms of housing provision, the quality of living environment and the promotion of sustainable communities which are being pursued by this policy, and there are not considered to be negative impacts associated with relying on them alone.			

Policy H3c: Housing Typologies: Open Spaces			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<b>Option 1: Include a specific 'typology' policy for Open Spaces.</b> Option 1 is considered to be preferable owing to the additional benefits in terms of the effective balancing of housing need against maintenance of adequate open space provision.		
Option 1: Include a specific 'typology' policy for Open Spaces.	1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home 5. Maintain/support employment base 6. Conserve/ enhance biodiversity and landscape 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	0 + + + 0 ++ 0 ++ ++	Mitigation not required as no negative impacts identified.
	<b>Commentary</b> This option is considered to have no negative impacts and to have positive impacts across those sustainability indicators relating to the effective balancing of housing need against maintenance of adequate open space provision. These include climate change adaptation, housing provision, the quality of the living environment and wider landscape, the provision of adequate infrastructure and the promotion of sustainable communities.		
Option 2: Do not include a specific policy for this 'typology', and rely on wider policies to regulate this form of development.	1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home 5. Maintain/support employment base 6. Conserve/ enhance biodiversity and landscape 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	0 +? + + 0 + 0 + +	
	<b>Commentary</b> To some extent the other policies in the Plan can be relied on to provide the kind of sustainability benefits in terms associated with the effective balancing of housing need against maintenance of adequate open space provision which are being pursued by this policy, and there are not considered to be negative impacts		

	associated with relying on them alone.
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Policy H3d: Housing Typologies: Town Centre Residential Sites			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<b>Option 1: Include a specific 'typology' policy for Town Centre Residential Sites</b> Option 1 is considered to be preferable owing to the additional benefits in terms of the sustainable development of the town centre, such as the safeguarding of business uses, reduced car use and the promotion of sustainable patterns of living.		
Option 1: Include a specific 'typology' policy for Town Centre Residential Sites	1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home 5. Maintain/support employment base 6. Conserve/ enhance biodiversity and landscape 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	0 / ++ + ++ 0 ++ / ++	Mitigation not required as no negative impacts identified.
Commentary	This option is considered to have no negative impacts and to have positive impacts across those sustainability indicators relating to the sustainable development of the town centre. These include housing provision, the quality of the living environment, the safeguarding of business uses, reduced car use and the promotion of sustainable patterns of living.		
Option 2: Do not include a specific policy for this 'typology', and rely on wider policies to regulate this form of development.	1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home 5. Maintain/support employment base 6. Conserve/ enhance biodiversity and landscape 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	0 / + + + 0 + / +	
Commentary	To some extent the other policies in the Plan can be relied on to provide the kind of sustainability benefits in terms associated with the sustainable development of		

	the town centre which are being pursued by this policy, and there are not considered to be negative impacts associated with relying on them alone.
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Policy H3e: Housing Typologies: Upward Extensions			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<b>Option 1: Include a specific 'typology' policy for Upward Extensions</b> Option 1 is considered to be preferable owing to the additional benefits in terms of the balancing of housing need against the capacity of the urban environment to accommodate increased densities and needs for infrastructure.		
Option 1: Include a specific 'typology' policy for Upward Extensions	1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home 5. Maintain/support employment base 6. Conserve/ enhance biodiversity and landscape 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	0 0 ++ ++ 0 0 ++ ++ +	Mitigation not required as no negative impacts identified.
<b>Commentary</b> This option is considered to have no negative impacts and to have positive impacts across those sustainability indicators which require the balancing of housing need against the capacity of the urban environment to accommodate increased densities and needs for infrastructure. These include housing provision, the quality of the living environment, the provision of sufficient infrastructure, reduced car use and the promotion of sustainable patterns of living.			
Option 2: Do not include a specific policy for this 'typology', and rely on wider policies to regulate this form of development.	1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home 5. Maintain/support employment base 6. Conserve/ enhance biodiversity and landscape 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	0 0 + + 0 0 + + +	
<b>Commentary</b> To some extent the other policies in the Plan can be relied on to support the balancing of housing need against the capacity of the urban environment to			

	accommodate increased densities and needs for infrastructure, with associated sustainability benefits. There are not considered to be negative impacts associated with relying on these policies alone.
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<b>Policy H3f: Housing Typologies: Conversions from Commercial/Non-Residential Uses</b>			
<b>Policy Options</b>	<b>SA Objective with Significant Effect</b>	<b>Positive or Negative Impact</b>	<b>Mitigation of Negative Impacts</b>
Chosen Option	<b>Option 1: Include a specific 'typology' policy for Conversions from Commercial/ Non-residential Uses</b> Option 1 is considered to be preferable owing to the additional benefits in terms of the sustainable regulation of adaptation of non-residential buildings for residential uses.		
Option 1: Include a specific 'typology' policy for Conversions from Commercial/ Non-residential Uses	1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home 5. Maintain/support employment base 6. Conserve/ enhance biodiversity and landscape 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	++	Mitigation not required as no negative impacts identified.
<b>Commentary</b> This option is considered to have no negative impacts and to have positive impacts across those sustainability indicators relating to the regulation of adaptation of non-residential buildings for residential uses. These include re-use of existing building stock, quality of housing provision and the living environment, the promotion of sustainable patterns of living, and the protection of business and community infrastructure uses.			
Option 2: Do not include a specific policy for this 'typology', and rely on wider policies to regulate this form of development.	1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home 5. Maintain/support employment base 6. Conserve/ enhance biodiversity and landscape 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	+ 0 / + + 0 + + +	

	<b>Commentary</b> To some extent the other policies in the Plan can be relied on to regulate the adaptation of non-residential buildings for residential uses in a sustainable manner. There are not considered to be negative impacts associated with relying on these policies alone.
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<b>Policy H3g: Housing Typologies: Urban Extensions</b>			
<b>Policy Options</b>	<b>SA Objective with Significant Effect</b>	<b>Positive or Negative Impact</b>	<b>Mitigation of Negative Impacts</b>
Chosen Option	<b>Option 1: Include a specific 'typology' policy for Urban Extensions</b> This option is preferred on the basis of the significantly greater opportunities it affords to promote the full range of sustainability factors through a strategic approach to planning urban extensions to Crawley, as against a more incremental, unplanned approach.		
Option 1: Include a specific 'typology' policy for Urban Extensions, seeking to ensure that where these occur they are progressed in a strategic way which takes account of the existing character and infrastructure capacity of Crawley, and of the opportunities for sustainable transport linkages.	1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home 5. Maintain/support employment base 6. Conserve/ enhance biodiversity and landscape 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	++	Mitigation not required as no negative impacts identified.
<b>Commentary</b> This option is considered to provide benefits across all Sustainability Indicators, since a strategic approach to urban extensions to Crawley should ensure that growth is planned in a way which takes account of all of these factors. This approach is considered to have particular benefits in terms of climate change mitigation and adaptation, protection of the built environment, biodiversity and landscape, the ensuring of adequate infrastructure provision, and the promotion of sustainable patterns of living.			
Option 2: Do not include a specific policy for this 'typology', and seek to ensure that urban extensions are achieved in a sustainable manner though duty to cooperate working.	1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home 5. Maintain/support employment base 6. Conserve/ enhance biodiversity and landscape 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and	+? +? - + +? - ? - -	

	Encourage active lifestyles		
<b>Commentary</b>			
This approach runs the risk that urban extensions will occur in an incremental or unplanned way. This poses particular risks in terms of protection of the built environment, biodiversity and landscape, a failure to take opportunities to promote sustainable, healthy lifestyles, and a failure to provide adequate infrastructure. Unplanned urban extensions would still have some benefits in terms of housing provision, and potentially in terms of climate change mitigation and adaptation through the use of advanced building standards. The maintenance a vibrant employment base is a further potential benefit in this scenario.			

#### Policy H4: Future Housing Mix

Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<b>Option 1: To provide an appropriate mix of dwelling types and sizes to address local housing needs.</b> <p>A policy on future housing mix is considered necessary to ensure that new housing development addresses local need (as evidenced by the Strategic Housing Market Assessment) and the council plans for a mix of housing which is appropriate to the needs of the community, in terms of house type and size.</p>		
Option 1: To provide an appropriate mix of dwelling types and sizes to address local housing needs.	1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment 4. Everyone has the opportunity to live in a decent and affordable home 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity and landscape 7. Reduce car journeys, sufficient transport infrastructure 8. Provision of sufficient infrastructure to meet the requirements of the borough. 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	0 0 0 + 0 0 0 0 +	Mitigation not required as no negative impacts identified.
<b>Commentary</b> <p>The application of such a policy, will have a significant positive impact on SA Objective 9 to promote mixed and balanced, more cohesive communities. The impact on SA 4 is also considered to be broadly positive in terms of increasing the opportunities for people to live in 'decent' homes which meet their lifestyle needs although it is recognised that this policy will not enable everyone to live in decent and affordable housing as identified in this objective.</p> <p>SA objectives 1,2,3,5,6,7 and 8 were ruled out on the basis that they are not specifically related to future housing mix.</p>			
Option 2: Allow market determination of appropriate future housing mix.	1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment 4. Everyone has opportunity to live in a decent and affordable home 5. Maintain/ support employment base 6. Conserve/ enhance biodiversity and landscape	0 0 0 -- 0 0	

	7. Reduce car journeys, sufficient transport infrastructure 8. Provision of sufficient infrastructure to meet the requirements of the borough. 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	0 --	
<b>Commentary</b>			
Allowing the housing market to determine the appropriate future mix of housing in terms of dwelling type and size, would have a significant negative impact on future housing supply and is likely to lead to a mismatch between identified housing need (through the SHMA) and the housebuilding industry's interpretation of need in terms of house type and size. This would have a significant negative impact on SA Objectives 4 and 9 and would not assist in extending the opportunity for people to live in decent homes which meet their lifestyle needs. It would also undermine SA Objective 9 by failing to provide a broader mix of housing which may facilitate mixed and balanced, more cohesive communities.			

#### Policy H5: Affordable Housing

Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<b>Option 4: 40% affordable housing requirement with no threshold.</b> This option is considered to offer the greatest level of affordable housing in light of the high pressures for such provision in the town and in light of the supply-led approach to housing delivery and in line with national requirements. It is justified by evidence in the SHMA. It is the most sustainable option as it delivers housing opportunities to the members of the town's population most in need of support and who would find it more difficult to access housing within the wider Housing Market Area and still access the job opportunities (particularly in the lower-skilled sectors) available in Crawley.		
Option 1: 40% affordable housing requirement with an 11-dwelling threshold	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 0 0 + 0 0 0 0 +	
<b>Commentary</b> Objectives 4 and 9 are considered the most relevant of the sustainability objectives with regards to this policy area. For this option, a positive impact is considered likely for both of these objectives as the Strategic Housing Market Assessment has shown a need for the provision of affordable housing would be supported by a level of provision at 40% or more through the Local Plan. This would also ensure mixed communities and good standards of development through integration of the affordable housing requirement as a clear element of the design scheme from the start. However, this is tempered with both the restrictions to just meeting the needs of those considered to be within the reasonable preference for need and would not support the provision of other types of need such as low cost market housing – potentially increasing the gap between those who can afford to take a first step onto the housing market ladder and those restricted to the rental market.			

	In addition, the restriction of application of the policy to developments of 11 dwellings or more could limit the actual amount of affordable housing provided within the borough, particularly in the latter part of the Plan when the larger sites have been completed and the housing provision is limited to small windfall sites.		
Option 2: 30% affordable housing requirement with an 11-dwelling threshold.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 0 0 + 0 0 0 0 +	
<b>Commentary</b> As with Option 1, however, through the reduction of the affordable housing requirement to 30% it may be that some of the viability issues are reduced.			
Option 3: 30% affordable housing requirement with no threshold.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 0 0 ++ 0 0 0 0 ++	
<b>Commentary</b> As with Option 2, however, the sliding scale option would increase the affordable housing provision to apply to all new residential developments.			
Option 4: 40% affordable housing requirement with no threshold.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 0 0 ++ 0 0 0 0 ++	Mitigation not required as no negative impacts identified.
<b>Commentary</b> As with Option 1, however, based on viability evidence the percentage applies to all			

new residential developments equally. This increases the likely provision of affordable housing in perpetuity to a greater extent than Option 3.

Policy H6: Build to Rent			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<b>Option 1: Include a specific policy tailored to ‘Build to Rent’ developments.</b> This option is preferred owing to its better performance in terms of appropriate housing provision, the maintenance of the employment base, and the promotion of sustainable communities.		
Option 1: Include a specific policy tailored to ‘Build to Rent’ developments, securing affordable housing in accordance with policy H5 and securing the market rental units for a covenant period.	1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home 5. Maintain/support employment base 6. Conserve/ enhance biodiversity and landscape 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	0 0 0 ++ ++ 0 0 0 ++	Mitigation not required as no negative impacts identified.
<b>Commentary</b> This issue relates only to the tenure of developments, and is therefore not considered to have implications for most sustainability indicators. In ensuring that mechanisms are in place to secure appropriate affordable housing provision as part of such developments, and in safeguarding this form of tenure where it is provided, this option is considered to provide significant benefits in terms of access to housing, the promotion of sustainable communities, and support for the presence in Crawley of a diverse workforce.			
Option 2: Do not include a specific policy for this type of development and rely on wider policies to regulate it.	1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home 5. Maintain/support employment base 6. Conserve/ enhance biodiversity and landscape 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	0 0 0 + + 0 0 0 +	
<b>Commentary</b> The existing policies provide a degree of regulation in respect of questions of			

	tenure. Since they fail to take into account the specifics of the Build to Rent model, however, the potential benefits associated with such schemes may not be fully realised, and case-by-case renegotiation of these issues them will be more uncertain and risky for the parties involved.
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<b>Policy H7: Self and Custom Build</b>			
<b>Policy Options</b>	<b>SA Objective with Significant Effect</b>	<b>Positive or Negative Impact</b>	<b>Mitigation of Negative Impacts</b>
Chosen Option	<b>Option 1: Include a specific policy to encourage and regulate self-build and custom housebuilding as part of appropriate housing developments within Crawley.</b>		
Option 1: Include a specific policy to encourage and regulate self-build and custom housebuilding as part of appropriate housing developments within Crawley.	<ol style="list-style-type: none"> <li>1. To minimise climate change</li> <li>2. To adapt to climate change</li> <li>3. Protect/enhance built environment</li> <li>4. Ensure everyone has the opportunity to live in a decent and affordable home</li> <li>5. Maintain/support employment base</li> <li>6. Conserve/ enhance biodiversity and landscape</li> <li>7. Reduce car journeys</li> <li>8. Ensure the provision of sufficient infrastructure</li> <li>9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles</li> </ol>	+ + + ++ + 0 0 0 +	Mitigation not required as no negative impacts identified.
<b>Commentary</b> This option is considered to provide a range of sustainability benefits to the extent that self- or custom-build units are likely to be built to better design, construction and sustainability standards, and because requiring a supply of serviced plots will facilitate access by those without access to land, with associated benefits in terms of sustainable communities and a more diverse workforce.			
Option 2: Do not include a specific policy for this type of housing, and leave it to the market to deliver self-build development.	<ol style="list-style-type: none"> <li>1. To minimise climate change</li> <li>2. To adapt to climate change</li> <li>3. Protect/enhance built environment</li> <li>4. Ensure everyone has the opportunity to live in a decent and affordable home</li> <li>5. Maintain/support employment base</li> <li>6. Conserve/ enhance biodiversity and landscape</li> <li>7. Reduce car journeys</li> <li>8. Ensure the provision of sufficient infrastructure</li> <li>9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles</li> </ol>	+? +? +? + 0 0 0 0 0	
<b>Commentary</b> This option is considered to have limited impacts in respect of most sustainability indicators. The positive benefits associated with self-build (better construction,			

	design, and environmental standards) are meanwhile less certain since they are dependent on the market. In the context of Crawley's limited land supply, meanwhile, would-be self-builders will find it harder to secure plots, and consequently be excluded from the borough.
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<b>Policy H8: Gypsy, Traveller and Travelling Showpeople Sites</b>			
<b>Policy Options</b>	<b>SA Objective with Significant Effect</b>	<b>Positive or Negative Impact</b>	<b>Mitigation of Negative Impacts</b>
Chosen Option	<p><b>Option 1: Criteria based policies specific to Gypsies, Travellers and Travelling Showpeople (GTTS) dealing with noise limiting exposure to noise (57 decibels for permanent sites, 60 decibels for long term temporary sites of up to one month and 66 decibels for temporary sites) and protecting the local environment/ amenity of residents (i.e. the suitability of specific employment uses in residential areas). In addition, a site would be designated for pitch provision to meet potential future accommodation needs of Gypsies and Travellers.</b></p> <p>Option 1 was chosen because it will meet potential future accommodation needs of the Gypsy and Traveller population, and would have a limited negative environmental impact on Crawley as a whole when compared to the other options.</p>		
Option 1: Criteria based policies specific to Gypsies, Travellers and Travelling Showpeople (GTTS) dealing with noise limiting exposure to noise (57 decibels for permanent sites, 60 decibels for long term temporary sites of up to one month and 66 decibels for temporary sites) and protecting the local environment/ amenity of residents (i.e. the suitability of specific employment uses in residential areas). In addition, a site would be designated for pitch provision to meet the full accommodation needs of Gypsies and Travellers.	1. Minimise climate change 2. Adapt to climate change 3. Built environment 4. Affordable homes 5. Maintain/support employment 6. Conserve and enhance biodiversity habitats 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote healthy active cohesive sustainable communities and Encourage active lifestyles	0 0 ? + 0 - 0 0 ?	Mitigation is required for SA Objective 6 as the allocation could have a negative effect on biodiversity/habitats. However, Policy H5 of the Local Plan does have wording to demonstrate that mitigation measures will be used to protect the allocation site from any potential environmental harm.
<b>Commentary</b> <p>SA objectives 1, 2, and 5 have been assessed as having a neutral impact owing to the small scale of the need/land take. However, individual site options have been assessed against these Sustainability Appraisal objectives on a smaller scale. Additionally, SA objective 7 will have no net impact because the population is already located in Crawley and has access to the town and its facilities. However, individual site options have also been assessed against these Sustainability Appraisal objectives on a smaller scale.</p> <p>The inclusion of caravan accommodation within the existing structure of the borough is likely to look different but not necessarily damaging to the built environment if mitigated appropriately through the Development Control process. The provision of pitches to meet the full accommodation needs of the GTTS community would provide a small number of affordable dwellings to meet a particular need.</p> <p>The impact of the site proposed also is likely to impact upon the biodiversity of the borough, namely the High Weald Area of Outstanding Natural Beauty (AONB), although this would be mitigated via the policy wording. Infrastructure requirements in terms of education and health would be limited, since the on-site GTTS community would be relatively small. However, the provision of pitches may result in the effective identification of a traveller community partially integrated into the settled community with uncertain effects on community cohesion.</p>			
Option 2: Criteria based policies specific to Gypsies, Travellers and Travelling Showpeople (GTTS) through limiting exposure to noise (57 decibels for permanent	1. Minimise climate change 2. Adapt to climate change 3. Built environment 4. Affordable homes 5. Maintain/support employment 6. Conserve and enhance biodiversity habitats 7. Promote sustainable journeys	0 0 -  + 0 -	

<p>sites, 60 decibels for long term temporary sites of up to one month and 66 decibels for temporary sites) but relying solely on other general design and amenity policies within the Local Plan</p> <p>In addition, a site would be designated for pitch provision to meet the full accommodation needs of Gypsies and Travellers.</p>	<p>8. Provide sufficient infrastructure 9. Promote healthy active cohesive sustainable communities and Encourage active lifestyles</p>	<p>0 0 ?</p>	
<p><b>Commentary</b></p> <p>SA objectives 1 2, and 5 have been assessed as having a neutral impact owing to the small scale of the need/land take. However, individual site options have been assessed against these Sustainability Appraisal objectives on a smaller scale. Additionally, SA objective 7 will have no net impact because the population is already located in Crawley and has access to the town and its facilities. However, individual site options have also been assessed against these Sustainability Appraisal objectives on a smaller scale.</p> <p>The inclusion of caravan accommodation within the existing structure of the borough is likely to look different but not necessarily be damaging to the built environment. However, for this option, the reliance upon other more general policies within the Local Plan in relation to the character would mean that the Local Planning Authority would have less control over the design of potential site provision. The provision of pitches to meet the full accommodation needs of the GTTS community would provide a small number of affordable dwellings to meet a particular need.</p> <p>The impact of pitch provision may also impact the biodiversity in the borough if provided on certain sites. However, provision of pitches may result in the effective identification of a traveller community so far partially integrated into the settled community with uncertain effects on community cohesion.</p>			
<p>Option 3: Criteria based policies specific to Gypsies, Travellers and Travelling Showpeople (GTTS) through limiting exposure to noise (57 decibels for permanent sites, 60 decibels for long term temporary sites of up to one month and 66 decibels for temporary sites) and protecting local amenity (suitability of specific employment uses in residential areas). However, no sites would be designated for Gypsy and Traveller provision within the borough.</p>	<p>1. minimise climate change 2. adapt to climate change 3. Built environment 4. Affordable homes 5. Maintain/support employment 6. Conserve and enhance biodiversity habitats 7. promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote healthy active cohesive sustainable communities and encourage active lifestyles</p>	<p>0 0 - - 0 - 0 0 ?</p>	
<p><b>Commentary</b></p> <p>SA objectives 1, 5 and 8 have been assessed as having a neutral impact because of the small scale of the need/land take.</p> <p>Additionally, SA objective 7 will have no net impact because the population is already located in Crawley and has access to the town and its facilities, there will be no change to the built environment, the provision of affordable housing, the conservation of biodiversity habitats.</p> <p>The continuation of a bricks and mortar housed Gypsy and Traveller community will not affect the built environment, but not providing a site would reduce the provision of affordable homes to meet a particular need. The impact on community cohesion is likely to remain constant.</p> <p>The impact of individuals living in bricks and mortar accommodation is uncertain.</p>			

Policy H9: Houses in Multiple Occupation			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option:	<b>Option 2: To restrict HMOs by criteria based on appropriate location, design and layout, impact on neighbouring amenity and privacy.</b> There is continued pressure for Houses in Multiple Occupancy in Crawley which provide an important source of housing supply. However, a large number of HMO's in one area can change the physical character of that area and can lead to conflict with the existing community. Tenants equally can suffer from poor conditions and mismanagement of properties. Appropriate measures, largely through the application of planning policy, are considered necessary to ensure that Houses in Multiple Occupancy are appropriately planned in terms of their location, design and layout and that their occupation does not create significant adverse impact on the character of the area and amenity and privacy of neighbouring properties.		
Option 1: No restriction on HMO's in terms of layout and design, impact on neighbouring amenity.	1. Minimise climate change 2. Adapt to climate change 3. Built environment 4. Everyone has opportunity to live in a decent and affordable home 5. Maintain/support employment 6. Conserve and enhance biodiversity habitats 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promotion of Healthy, Active, Cohesive and Mixed Communities and Encourage active lifestyles	0 0 0 -- 0 0 0 0 -- 	
<b>Commentary</b> Not applying any restrictions on appropriate design, layout and location of HMO's would lead to unsatisfactory standards of accommodation for many occupiers and lead to a detrimental effect on the amenity of adjoining residents in terms of noise and disturbance. Planning policy control is widely considered necessary in Crawley to ensure that these properties, whilst an important contribution towards supply overall, do not significantly affect the character of an area and amenity of tenants and neighbours alike.			
Option 2: To restrict HMOs by criteria based on appropriate location, design and layout, impact on neighbouring amenity and privacy.	1. Minimise climate change 2. Adapt to climate change 3. Built environment 4. Everyone has opportunity to live in a decent and affordable home 5. Maintain/support employment 6. Conserve and enhance biodiversity habitats 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promotion of Healthy, Active, Cohesive and Mixed Communities and Encourage active lifestyles	0 0 0 + 0 0 0 0 +	Mitigation not required as no negative impacts identified.
<b>Commentary</b> The application of this policy will have a marginal positive impact on SA Objective 4 (Ensure everyone has the opportunity to live in a decent and affordable home) and 9 (Promotion of Healthy, Active, Cohesive and Mixed Communities). SA objectives 1, 2, 3, 5, 6, 7, and 8 were ruled out on the basis that they are not specifically related to the provision of shared accommodation.			
Option 3: Restricting HMOs by location/	1. Minimise climate change 2. Adapt to climate change	0 0	

concentration?	3. Built environment 4. Everyone has opportunity to live in a decent and affordable home 5. Maintain/support employment 6. Conserve and enhance biodiversity habitats 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promotion of Healthy, Active, Cohesive and Mixed Communities and Encourage active lifestyles	0 ? 0 0 0 0 ? ?	
<b>Commentary</b> New HMO's are monitored by location and concentration. Consideration may need to be given to the need to introduce Article 4 Directions in certain locations removing Permitted Development Rights for the conversion of dwellings to small HMO's in areas where there is a high risk of concentrations of HMO's.			

## Green Infrastructure

Policy GI1: Green Infrastructure			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<b>Option 1: Identify a green infrastructure network and opportunities for enhancement.</b> Option 1 is the most suitable as it has the most positive effect of the sustainability objectives.		
Option 1: Identify a green infrastructure network and opportunities for enhancement.	. 1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+ + + 0 + 0 + + ++	Mitigation not required as no negative impacts identified.
<b>Commentary</b> This option provides a way of ensuring the required green infrastructure is delivered to support planned development. It also ensures that existing green infrastructure is not compromised by requiring mitigation or compensation for negative impacts on green infrastructure.			
Option 2: Do not identify a green infrastructure network and do not identify green infrastructure to support development.	. 1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	- - ? ? ? - 0 - -	Mitigation would be required as maintenance and awareness of the importance of green infrastructure would not be forthcoming.

<b>Commentary</b>
Without identifying Crawley's valued green infrastructure and requiring impacts upon it to be mitigated or compensated for would gradually lead to a more fragmented network of green infrastructure which is unable to respond to climate change and growth of the town.

<b>Policy GI2: Biodiversity and Net Gain</b>			
<b>Policy Options</b>	<b>SA Objective with Significant Effect</b>	<b>Positive or Negative</b>	<b>Mitigation of Negative Impacts</b>
Chosen Option	<b>Option 1: To ensure a net gain in biodiversity.</b> This is the most suitable option because biodiversity in England has been declining and becoming more fragmented. A net gain is required to reverse this trend and achieve the national ambition of moving from net biodiversity loss to net gain.		
Option 1: To ensure a net gain in biodiversity.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+ + + / / ++ 0 + +	Mitigation not required as no negative impacts identified.
<b>Commentary</b> This is the most suitable option because biodiversity in England has been declining and becoming more fragmented. A net gain is required to reverse this trend and achieve the national ambition of moving from net biodiversity loss to net gain. Movement towards the introduction of Pollination management plans further promotes increasing net gain and protection of wildlife.			
Option 2: To ensure no net loss of biodiversity.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+? +? / / / +? 0 - -?	
<b>Commentary</b> This policy approach protects what we already have but falls short of local and national ambitions to improve biodiversity as well as halt its loss.			

<b>Policy GI3: Biodiversity Sites</b>			
<b>Policy Options</b>	<b>SA Objective with Significant Effect</b>	<b>Positive or Negative Impact</b>	<b>Mitigation of Negative Impacts</b>
Chosen Option	<b>Option 1:</b> Option 1 has been chosen as it has been adapted from the NPPF and provides the requirements to safeguard particular types of designation that promote the greatest enhancement to natural capital.		
Option 1: Identify where biological sites are in Crawley and ensure these designated sites are well protected.	19. To minimise climate change 20. To adapt to climate change 21. Protect/enhance built environment 22. Ensure everyone has the opportunity to live in a decent and affordable home 23. Maintain/support employment base 24. Conserve/enhance biodiversity habitats	++ + + / / ++	Mitigation not required as no negative impacts identified.

	25. Reduce car journeys 26. Ensure the provision of sufficient infrastructure 27. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	/ + +	
<b>Commentary</b> Incorporating the requirement for developments to have habitat and species surveys for the listed designated areas promotes SA objectives 1, 2, 3, 6, 8 and 9. Some neutral if not smaller positive impacts are provided through an enhanced designation and provision of biodiversity sites in meeting SA objective 7.			
Option 2: Do not identify biodiversity sites	19. To minimise climate change 20. To adapt to climate change 21. Protect/enhance built environment 22. Ensure everyone has the opportunity to live in a decent and affordable home 23. Maintain/support employment base 24. Conserve/enhance biodiversity habitats 25. Reduce car journeys 26. Ensure the provision of sufficient infrastructure 27. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	- - - - - - - - - -	There would be adverse effects on each section of the Hierarchy of Biodiversity sites and development would be able to build on these areas within the natural environment.
<b>Commentary</b> Not identifying biodiversity sites would provide a negative benefit to biodiversity as a whole. Policy is required to mitigate against destruction to the natural capital environment.			
Option 3: Rely on the NPPF	1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home 5. Maintain/support employment base 6. Conserve/enhance biodiversity habitats 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	+ + + / / + / + +	Mitigation not required as negative impacts identified, national policy itself aims to mitigate against potential biodiversity loss.
<b>Commentary</b> The NPPF forms the basis for this policy as the 2018 version provides the legislative requirement of habitat and species surveys being required for planning applications effecting areas listed under the Hierarchy of Biodiversity sites.			

#### Policy GI4: Local Green Space

Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<b>Option 1: Designate areas of particular importance to a local community.</b> Option 1 is preferred as those sites designated are of great importance to the wellbeing of the surrounding community		
Option 1: Designate areas of particular	1. Minimise climate change 2. Adapt to climate change	++?	Mitigation not required as no negative impacts identified.

Importance to a local community	3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 0 0 ++ 0 ++ ++ ++ ++	
<b>Commentary</b>			
Option 2: Do not designate areas of particular importance to the local community.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	? ? / / / ? 0 ? -?	
<b>Commentary</b>			

## Sustainable Design & Construction

Policy SDC1: Sustainable Design and Construction			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<b>Option 5: combination of options 2-4 (overarching climate change mitigation/adaptation requirement; advanced CO<sub>2</sub> standard for dwellings; BREEAM standard for non-residential buildings) with implementation of a recognised quality regime to address the 'performance gap'.</b> Option 5 is considered to be the most effective combination of the various possible approaches in respect of Sustainable Design and Construction, offering the most extensive and certain sustainability benefits which are considered achievable in the context of current national policy and legislation.		
Option 1: Do not include a policy relating to development & climate change.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	-- -- 0 - - 0 0 0 -	
<b>Commentary</b>			

The NPPF requires us to actively plan for a sustainable future. By not including a policy aimed to bring about a reduction in energy consumption and addressing climate change issues through effective design & construction processes the plan would not be NPPF compliant. Further to this, failure to include planning policy requirements in this area would be predicted to result in less effective climate change mitigation and adaptation measures, poorer standards of building, increased energy costs for

	consumers, increased overheating risk, and greater long-run costs for building owners and users arising from the need for more extensive retrofitting of premises in future.		
Option 2: Include a policy relating to development & climate change which requires development to adhere to the 'energy hierarchy', and to adapt to climate change through efficient use of water and mitigation of overheating risk. Relevant measures to be set out in a proportionate 'Sustainability Statement' for significant proposals.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+	
<p><b>Commentary</b></p> <p>This kind of overarching requirement is considered valuable as a means of ensuring that all kinds of development, and particularly more significant proposals, is designed and implemented in a way which adheres to key principles of climate change mitigation and adaptation. This is considered to assist climate change mitigation and adaptation; to improve the quality of new buildings; to promote a healthy indoor environment all year round, and to have potential benefits biodiversity and landscape through such adaptation measures as tree planting and green roofs. The limited scope to set clear quantitative standards within this type of catch-all policy is, however, considered to limit the extent of these benefits.</p>			
Option 3: Combine option 2 with a CO <sub>2</sub> emissions standard for new dwellings in advance of Building Regulations requirements, in the form of a 19% reduction in CO <sub>2</sub> emissions in comparison with Building Regulations requirements, while allowing scope for this to be superseded by stricter National requirements.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	++ ++ 0 ++ + +? 0 0 ++	
<p><b>Commentary</b></p> <p>The requirement suggested in this option is equivalent to the CO<sub>2</sub> emissions standard included in Level 4 of the discontinued Code for Sustainable Homes, and is considered to be the most advanced standard which is compatible with the Ministerial Statement of March 2015 and the requirement in para. 150.b) of the 2019 NPPF to 'reflect the Government's policy for national technical standards.' The allowance for the introduction of stricter national standards is considered prudent and necessary in the light of anticipated national changes in this area. In addition to the benefits identified in option 2, this option is expected to reduce CO<sub>2</sub> emissions as well as summer heat gain; and reduce energy costs for residents. Since this standard is now relatively familiar and the technical measures required are becoming cheaper, any additional cost burden on developers is considered to be more than offset by long-run cheaper energy costs, greater appeal to consumers, and the encouragement of greater investment in green technologies.</p>			
Option 4: Combine option 3 with a requirement for new non-residential buildings, in the form of the 'minimum standards' for BREEAM 'Excellent' within the Energy category.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	++ ++ 0 ++ ++ +? 0 0 ++	

	active lifestyles		
<b>Commentary</b>			
Non-residential development is likely to take place on a smaller scale than residential development during the Local Plan period, and to that extent an approach setting standards in advance of Building Regulations may have less scope to assist climate change mitigation and adaptation. In addition consumer pressure and the self-interest of developers are considered to be more effective at driving sustainability improvements in this sector than in the residential sector. Even so, Crawley remains a significant focus of commercial and industrial employment owing to the presence of Gatwick Airport and the Manor Royal Business District, and emissions from commercial and industrial premises are significant. The inclusion of a standard in respect of such development is therefore likely to have net sustainability benefits in terms of climate change mitigation and adaptation. In improving the environmental performance of building stock, this should also have commercial benefits in terms of premises which are less expensive to manage and maintain, and more attractive to business tenants and workers. The 'minimum standards' for BREEAM 'Excellent' are considered to represent an appropriate benchmark for this purpose, representing an improvement on Building Regulations which is benchmarked against the wider building stock, and which is sufficiently flexible to accommodate the varying needs of non-residential developers and building users.			
Option 5: Combine option 4 with a requirement addressing the 'performance gap' between 'as designed' and 'as built' performance, in the form of a requirement for major development proposals to implement a recognised quality regime.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	++ ++ +? ++ ++ +? 0 0 ++	Mitigation not required as no negative impacts identified.
<b>Commentary</b>			
In light of the widely recognised 'performance gap', between the performance of new buildings as modelled, and the performance of buildings as actually implemented, it is considered that a requirement of this kind has the potential to reinforce the benefits associated with option 4. In addition, better construction standards should have benefits in terms of protecting and enhancing the built environment			
Option 6: Combine option 5 with a carbon offset fund, enabling developments to mitigate their emissions by contributing to the cost of other projects which will reduce CO <sub>2</sub> emissions.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+? +? +? ++? ++? +? 0 0 ++?	
<b>Commentary</b>			
Carbon offsetting is identified as a means of achieving very low net CO <sub>2</sub> emissions. In order to be effective, however, it needs to be combined with very advanced standards, along the lines of the unimplemented 'Zero Carbon Homes' standard. The Code Level 4 standard for dwellings and the BREEAM standard for non-residential development included in options 3 to 5 are considered appropriate to those types of development and compliant with national policy. They are capable of being implemented on site, and since on-site reductions are more certain than, and should take priority over, off-site mitigation, the option of offsetting is not considered appropriate in the context of option 5.			
Option 7: Combine option 5 with a 'Merton'-style	1. Minimise climate change 2. Adapt to climate change	++? ++?	

policy, specifying a minimum proportion of energy needs which a development should derive from low and zero carbon energy sources.	3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+? ++ ++ +? 0 0 ++	
<b>Commentary</b> Councils retain the legal ability to require developments to draw a proportion of their energy supply from low or zero carbon energy sources under the Planning and Energy Act 2008. In the context of the overall energy efficiency/emissions standards identified in options 3 to 5, however, it is considered that this approach could be counterproductive to the extent that it might deter 'be lean' measures aimed at reducing overall energy demand, which according to the 'energy hierarchy' should take priority over the use of renewables or low/zero carbon energy sources. Climate change mitigation and adaptation benefits associated with greater fabric efficiencies would therefore be less certain if this kind of requirement were to be introduced.			

<b>Policy SDC2: District Energy Networks</b>			
<b>Policy Options</b>	<b>SA Objective with Significant Effect</b>	<b>Positive or Negative Impact</b>	<b>Mitigation of Negative Impacts</b>
	<b>Option 2: Include Local Plan policy with the council at the centre of network development</b> Option 2 has been chosen to be in conformity with national policy. If no policy (Option 1) were taken not only would we not be in conformity with national policy but it could also hamper the efforts to create energy efficient networks within the borough. Option 3 was seen as an unrealistic option due to the uncertainty that it may bring.		
Option 1: Have no policy in relation to sourcing energy efficiently.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	-? 0 0 -? 0 0 0 0 0	
	<b>Commentary</b> The NPPF asks for Local Authorities to "identify opportunities where development can draw its energy supply from decentralised, renewable or low carbon energy supply systems". By not doing this the plan wouldn't be in conformity with national policy and would result in little/no policy support for such developments leaving it for the market alone to provide. More carbon intensive and expensive (for consumers) forms of energy would be more likely to be installed in the absence of district/ decentralised energy.		
Option 2: Include Local Plan policy with the council at the centre of network development.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	++ 0 0 + + 0 0 + +?	Mitigation not required as no negative impacts identified.

	<b>Commentary</b> By providing a local policy encouraging the development of District Energy Networks and associated infrastructure, and by stating that the council will take a central role in achieving this, a degree of certainty in achieving the objective is provided. This will also go a long way to establishing networks in the priority zones as identifies in the Local Plan. This will in turn lead to an efficient supply of energy via district energy networks across the borough. With the council taking a lead on delivering these networks certainty can be provided in their delivery resulting in it receiving a higher positive impact on the sustainability objective. The policy aims at securing private development is connects or is capable of connecting to the network placing minimal burdens on developers whilst ensuring the network can be developed.																		
Option 3: Include Local Plan policy encouraging the market to deliver network development.	<table border="1"> <tr><td>1. Minimise climate change</td><td>+</td></tr> <tr><td>2. Adapt to climate change</td><td>0</td></tr> <tr><td>3. Protect/enhance built environment</td><td>0</td></tr> <tr><td>4. Decent, affordable homes</td><td>+?</td></tr> <tr><td>5. Maintain/support employment</td><td>+?</td></tr> <tr><td>6. Conserve/enhance biodiversity and landscape</td><td>0</td></tr> <tr><td>7. Promote sustainable journeys</td><td>0</td></tr> <tr><td>8. Provide sufficient infrastructure</td><td>+?</td></tr> <tr><td>9. Promote sustainable communities and Encourage active lifestyles</td><td>+?</td></tr> </table>	1. Minimise climate change	+	2. Adapt to climate change	0	3. Protect/enhance built environment	0	4. Decent, affordable homes	+?	5. Maintain/support employment	+?	6. Conserve/enhance biodiversity and landscape	0	7. Promote sustainable journeys	0	8. Provide sufficient infrastructure	+?	9. Promote sustainable communities and Encourage active lifestyles	+?
1. Minimise climate change	+																		
2. Adapt to climate change	0																		
3. Protect/enhance built environment	0																		
4. Decent, affordable homes	+?																		
5. Maintain/support employment	+?																		
6. Conserve/enhance biodiversity and landscape	0																		
7. Promote sustainable journeys	0																		
8. Provide sufficient infrastructure	+?																		
9. Promote sustainable communities and Encourage active lifestyles	+?																		
	<b>Commentary</b> The policy would hope to achieve the development of networks by placing the emphasis upon the private sector and the market to deliver them. This results in uncertainty and places a larger burden on the private sector. Due to this reduced certainty of delivery and no guarantee as to the timeframe that they may take to materialise this option has scored worse in this SA.																		

<b>Policy SDC3: Tackling Water Stress</b>																					
<b>Policy Options</b>	<b>SA Objective with Significant Effect</b>	<b>Positive or Negative Impact</b>	<b>Mitigation of Negative Impacts</b>																		
Chosen Option:	<b>Option 1: Development of a local plan policy to mitigate the impact of development on the water environment.</b> This approach draws upon the established evidence base to identify a locally specific water stress issue that can be mitigated through the local plan by scoping a policy requiring major developments to go beyond the minimum water efficiency standards identified nationally. In doing so, this approach pro-actively addresses an identified water stress issue, whilst delivering other benefits against identified sustainability indicators.																				
Option 1: Develop a local plan policy to minimise the impact of development on the water environment.	<table border="1"> <tr><td>1. Minimise climate change</td><td>+?</td></tr> <tr><td>2. Adapt to climate change</td><td>++</td></tr> <tr><td>3. Protect/enhance built environment</td><td>0</td></tr> <tr><td>4. Decent, affordable homes</td><td>+?</td></tr> <tr><td>5. Maintain/support employment</td><td>0</td></tr> <tr><td>6. Conserve/enhance biodiversity and landscape</td><td>+</td></tr> <tr><td>7. Promote sustainable journeys</td><td>0</td></tr> <tr><td>8. Provide sufficient infrastructure</td><td>0</td></tr> <tr><td>9. Promote sustainable communities and Encourage active lifestyles</td><td>0</td></tr> </table>	1. Minimise climate change	+?	2. Adapt to climate change	++	3. Protect/enhance built environment	0	4. Decent, affordable homes	+?	5. Maintain/support employment	0	6. Conserve/enhance biodiversity and landscape	+	7. Promote sustainable journeys	0	8. Provide sufficient infrastructure	0	9. Promote sustainable communities and Encourage active lifestyles	0	Mitigation not required as no negative impacts identified.	
1. Minimise climate change	+?																				
2. Adapt to climate change	++																				
3. Protect/enhance built environment	0																				
4. Decent, affordable homes	+?																				
5. Maintain/support employment	0																				
6. Conserve/enhance biodiversity and landscape	+																				
7. Promote sustainable journeys	0																				
8. Provide sufficient infrastructure	0																				
9. Promote sustainable communities and Encourage active lifestyles	0																				
	<b>Commentary</b> Crawley is situated in an area of serious water stress, and recommends the local plan should include policy to help mitigate the impact of development on the water environment. By developing a locally specific policy, the local plan will be able to build upon the water efficiency requirements of the NPPF, drawing upon the evidence base of the Water Cycle Study to scope the feasibility of adopting a local standard that goes beyond the minimum national requirements. To do this BREAAAM water efficiency requirements and the optional tighter Building Regulations requirements have been made compulsory. A 'stretch' target of 80 litres/person/day for residential development has also been identified as something to be pursued where feasible. Allowance has also been made for any future changes in national policy, such as the																				

	introduction of nationally described standards. Such an approach would help mitigate a locally specific issue, thereby promoting a more sustainable plan. Therefore, Option 1 is the preferred approach.		
Option 2: Do not include a policy and rely on existing national requirements of the NPPF, and conformity with Building Regulations to mitigate the impact of development on the water environment.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 - 0 - - 0 - 0 -	
<b>Commentary:</b> This approach would rely on existing national guidance (NPPF) and minimum water efficiency standards as identified in the Building Regulations to mitigate the impact of development on the water environment. In the context of a water stressed area this is likely to make water shortages more likely, with associated negative impacts on water infrastructure, health, consumers' water bills, and the resilience of the local environment in the face of climate change.			

## Environmental Protection

Policy EP1: Development and Flood Risk			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<b>Option 2: Include a locally specific flood risk policy.</b> Option 2 has been chosen, as this better enables flood risk to be dealt with in a locally specific manner. It provides a policy hook through which the most up-to-date Environment Agency Flood Maps and recommendations of the SFRA can be taken into account in planning decisions, and in doing so the option delivers positive sustainability impacts against objectives 2, 3, 6, 8, and 9.		
Option 1: Rely on national planning guidance.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 + + ? ? + 0 0 +	
<b>Commentary</b> Under Option 1, the council would rely on the National Planning Policy Framework as the principal policy mechanism to manage the relationship between development and flood risk. A Strategic Flood Risk Assessment would be utilised to interpret national guidance at the local level, delineating areas of flood risk and outlining recommendations to minimise flood risk to property. Adopting this approach would avoid repetition of national guidance, though would not enable evidence base work, in particular recommendations of an updated Strategic Flood Risk Assessment and the Gatwick Sub-Regional Water Cycle Study, to be factored into a locally specific policy. By failing to translate evidence base recommendations into policy, there is significant risk that opportunities to deliver the most sustainable forms of development, particularly in flood risk terms, will be missed. Objective scoped out: Option 1. To minimise climate change: The absence of a flood risk policy in the local plan will not impact upon objectives to minimise climate change, though may affect the scope for sustainable planning to minimise the risk of its impacts. Option 7. Reduce car journeys: The objective to achieve a reduction in car journeys is			

	not specifically related to the presence or absence of a local flood risk policy. Option 10. Participate in sport/ health: The objective to achieve participation in sport/improved health is not specifically related to the presence or absence of a local flood risk policy.		
Option 2: Include a locally specific flood risk policy.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 ++ ++ ? ? ++ 0 + + 0	Mitigation not required as no negative impacts identified.
<p><b>Commentary</b></p> <p>Under Option 2, the Local Plan would implement a locally specific policy to ensure that development is not placed at an unacceptable risk of flooding and does not increase flood risk elsewhere. The approach would ensure that development proposals are brought forward in a manner that reflects locally specific evidence base as well as national policy requirements. Specifically, a local plan approach would act as a policy 'hook' through which the recommendations of an updated Strategic Flood Risk Assessment, and the Gatwick Sub-Regional Water Cycle Study (particularly in terms of requiring Sustainable Drainage Systems to offset any increase in flood risk from development) could be implemented. This would arguably result in the delivery of a more sustainable approach to managing flood risk, particularly in terms of meeting objectives 2, 3, and 6.</p> <p>Objective scoped out:</p> <p>Option 1. To minimise climate change: An Option 2 approach will not impact upon objectives to minimise climate change, though will influence sustainable planning that adapts to its impacts.</p> <p>Option 7. Reduce car journeys: The objective to achieve a reduction in car journeys is not specifically related to the presence or absence of a local flood risk policy.</p> <p>Option 10. Participate in sport/ health: The objective to achieve participation in sport/improved health is not specifically related to the presence or absence of a local flood risk policy.</p>			

<b>Policy EP2: Flood Risk Development Guidance</b>			
<b>Policy Options</b>	<b>SA Objective with Significant Effect</b>	<b>Positive or Negative Impact</b>	<b>Mitigation of Negative Impacts</b>
Chosen Option	<p><b>Option 1: Include a specific policy detailing bespoke requirements for Householder Applications:</b></p> <p>This option is preferred because the sustainability benefits associated with it, while similar in kind to those in option 2, are more certain.</p>		
Option 1: Include a specific policy detailing bespoke requirements for Householder Applications	28. To minimise climate change 29. To adapt to climate change 30. Protect/enhance built environment 31. Ensure everyone has the opportunity to live in a decent and affordable home 32. Maintain/support employment base 33. Conserve/enhance biodiversity habitats 34. Reduce car journeys 35. Ensure the provision of sufficient infrastructure 36. Healthy, active, cohesive and socially sustainable communities and	/ + 0 0 0 + 0 + +	Mitigation not required as no negative impacts identified.

	Encourage active lifestyles		
<b>Commentary</b>			
By providing tailored and proportionate requirements for the treatment of flood risk in the context of householder applications it is considered that this option would achieve better outcomes in terms of flood risk management, which would represent a benefit in terms of climate change adaptation, impact on biodiversity, and infrastructure (surface water drain) facilities.			
Option 2: Leave Householder applications to be determined in accordance with EP1, with tailored guidance for such applications to be provided in the Planning & Climate Change SPD.	28. To minimise climate change 29. To adapt to climate change 30. Protect/enhance built environment 31. Ensure everyone has the opportunity to live in a decent and affordable home 32. Maintain/support employment base 33. Conserve/enhance biodiversity habitats 34. Reduce car journeys 35. Ensure the provision of sufficient infrastructure 36. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	/ +? 0 0 0 +? 0 +? +? +?	
<b>Commentary</b>			
Supplementary Planning Guidance regarding householder applications within the context of Policy EP1 has potential additional benefits arising from more effective treatment of flood risk in smaller scale schemes. These relate to climate change adaptation, biodiversity, infrastructure provision and public safety.			

Policy EP3: Pollution Management and Land Contamination			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<b>Option 2: Develop a specific local plan policy to manage issues of pollution and land contamination.</b> It is considered that the Option 2 approach more readily enables the local planning authority to ensure development promotes the concepts of sustainable development, and is for this reason the preferred approach.		
Option 1: Rely on existing legislation to manage issues of pollution and land contamination.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+ + + + 0 + 0 0 + 0	

	to support the legislation, and Option 1 is not therefore preferred. Objectives scoped out: 5, 7, 8 and 10 - it is not considered that the above option would impact on these objectives.		
Option 2: Develop a specific local plan policy to manage issues of pollution and land contamination.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	++ ++ ++ + 0 + 0 0 ++ 0	Mitigation not required as no negative impacts identified.
<p><b>Commentary</b></p> <p>The Option 2 approach would be to develop a specific local plan policy to manage issues of pollution and land contamination. In developing a local plan policy, this approach provides a mechanism through which environmental health advice can be factored into the planning system, offering greater policy certainty and clarity, and a consistency of approach for developers and decision makers. In doing so, it is considered that the Option 2 approach more readily enables the local planning authority to ensure development promotes the concepts of sustainable development, and is for this reason the preferred approach.</p> <p>Objectives scoped out: 5, 7, 8 and 10 - it is not considered that the above option would impact on these objectives.</p>			

<b>Policy EP4: Development and Noise</b>			
<b>Policy Options</b>	<b>SA Objective with Significant Effect</b>	<b>Positive or Negative Impact</b>	<b>Mitigation of Negative Impacts</b>
Chosen Option	<b>Option 5: Include a locally specific noise policy in the local plan, drawing upon national planning policy, up-to-date evidence and local guidance through 'Planning Noise Advice Document: Sussex', to identify a detailed Local Plan noise appendix through which to interpret the policy. Identify 66dB as the upper noise limit for noise sensitive development.</b> Option 3 is chosen, as the approach enables greater certainty when having regard to noise in development management decisions, whilst having regard to empirical evidence on the health impacts of noise exposure, and taking account of the planning principles established by the North East Sector Planning Inspector's Report. This enables local circumstance to be taken into account of within both a site allocation and development management context.		
Option 1: Do not include a noise specific policy in the local plan, instead relying on the guidance of the NPPF.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 0 0 -- 0 0 0 0 --	
<p><b>Commentary</b></p> <p>Under this option, the local plan would not bring forward a policy to manage the relationship between development and noise. This would mean relying on the guidance of the NPPF and Planning Practice Guidance, which do not provide any noise standards to guide planning applications.</p>			
Option 2: Retain and update the existing Local	1. Minimise climate change 2. Adapt to climate change	0 0	Mitigation not required as no negative impacts identified.

Plan Policy and Noise Annex to take account of new evidence.	3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	0 ++ 0 0 0 0 ++	
<b>Commentary</b> This approach would retain, and update to take account of new evidence, the locally specific noise standards identified in the Local Plan Noise Annex as a means of locally identifying the noise exposure levels at which noise impact becomes unacceptable. The policy also draws upon Noise Advice Document: Sussex to help guide applications. The Local Plan noise standards have been successfully defended at a number of planning appeals, and retaining and building upon these standards represents the most sustainable approach.			

Policy EP5: Air Quality			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<b>Option 2: Include a locally specific air quality policy in the Local Plan.</b> It is considered that in enabling national air quality guidance to be interpreted and addressed at the local level, Option 2 represents the most sustainable approach to managing the relationship between development and air quality, both within and beyond the borough.		
Option 1: Do not include a specific air quality policy in the Local Plan, instead relying on the guidance of the NPPF.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+ + 0 0 0 0 0 + 0	
Option 2: Include a locally specific air quality policy in the Local Plan.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	++ ++ 0 0 0 ++ 0 0 ++ 0	Mitigation not required as no negative impacts identified.
	<b>Commentary</b> Under this option, the local plan would not bring forward a policy to manage the air quality impact of development. Rather, it would rely on the guidance of the National Planning Policy Framework. However, there remains a need to identify locally specific approaches to address identified air quality issues. As such, it is considered that local policy of some form will be necessary.		
	<b>Commentary</b> Option 2 would involve the inclusion of a locally specific air quality policy within		

the local plan that refers to 'Air Quality & Emission Mitigation Guidance for Sussex' produced by Sussex Air in partnership with Sussex Local Planning Authorities. The document sets out Sussex-wide guidance to identify local thresholds outlining the level, type, and location of development at which the requirement to undertake an Air Quality Assessment, and if necessary provide mitigation to offset air quality impact, will be required. A locally specific policy would draw upon this guidance, and would also enable any objectives identified within Air Quality Management Plans to be taken into account through the planning process. Further, a Local Plan policy approach provides an opportunity to consider any cross boundary impacts of development within Crawley. On this basis, it is felt that a locally specific policy will more effectively enable the national air quality objectives of the NPPF to be delivered within a local context.

## Sustainable Transport

### Policy ST1: Development and Requirements for Sustainable Transport

Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<p><b>Option 1: Include a policy setting out the broad approach to assessing the transport needs of new developments within the framework set by the NPPF, including an emphasis on the prioritisation of accessibility by sustainable modes; support to sustainable transport infrastructure, and requirements for Transport Assessments/Statements and Travel Plans to accompany applications with significant transport implications.</b></p> <p>Option 1 has been chosen since broadly, this policy option will better support the objectives of reducing car journeys substantially (SA Objective 7), and mitigating climate change (SA Objective 1). Furthermore, relying on the broader policies contained within the NPPF (Option Two) may not have an impact on whether new developments that generate significant transport movements are located within the appropriate locations, since the NPPF states that the Local Planning Authority should create local policies with regards to this matter. In addition, with regards to the retention and usage of existing transport infrastructure (SA Objective 8), it is believed that Option One could ensure that the existing transport infrastructure provision is utilised to its full potential. It is also considered that this option will better facilitate in general terms the incorporation of transport and access considerations into the design of new developments.</p>		
Option 1: Include a policy setting out the broad approach to assessing the transport needs of new developments within the framework set by the NPPF, including an emphasis on the prioritisation of accessibility by sustainable modes; support to sustainable transport infrastructure, and requirements for Transport Assessments/Statements and Travel Plans to accompany applications with significant transport implications.	<ol style="list-style-type: none"> <li>1. Minimise climate change</li> <li>2. Adapt to climate change</li> <li>3. Protect/enhance built environment</li> <li>4. Decent, affordable homes</li> <li>5. Maintain/support employment</li> <li>6. Conserve/enhance biodiversity and landscape</li> <li>7. Promote sustainable journeys</li> <li>8. Provide sufficient infrastructure</li> <li>9. Promote sustainable communities and Encourage active lifestyles</li> </ol>	+ + + +? + +? ++ + +	Mitigation not required as no negative impacts identified.

#### Commentary

The main thrust of this policy option is to ensure that each development sufficiently meets its access needs, whilst utilising the existing transport infrastructure. A reduction in car journeys (SA Objective 7) and subsequent reduction in carbon emissions (SA Objective 1) are the likely effects of this policy option. This policy could have a positive on the protection of the built environment (SA Objective 3) and the sustainable design of new developments (SA Objective 2) through a reduced need for design considerations to be dictated by the needs of access by private motor vehicle. It is also contended that the sustainable location of both the community centres and leisure facilities should assist with participation in sport and in creating cohesive

	<p>communities (SA Objective 9). It is considered that this policy option will have a possible positive impact upon both affordable housing provision (SA Objective 4) and a positive impact on the maintenance of a diverse employment base (SA Objective 5), through the concentration of such developments on more sustainable, resilient sites. Lastly, it is believed that a potential increase in the usage of existing transport infrastructure for new developments will minimise the need for new transport infrastructure (SA Objective 8) within the borough.</p>		
Option 2: Do nothing locally and rely solely on the NPPF to promote sustainable transport.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	- - - -? / - - - -	
<b>Commentary</b> <p>Relying solely on the NPPF is considered to pose a risk of negative outcomes across a wide range of sustainability objectives. The NPPF (Paras 102-4) places significant emphasis on the role of local plan policies in directing development to sustainable locations, exploiting opportunities to promote sustainable modes, and ensuring that transport considerations are integrated within the design process. Failure to take this proactive role is therefore considered likely to lead to adverse outcomes as a result of inadequate management of transport considerations as part of the planning process.</p>			

<b>Policy ST2: Car and Cycle Parking Standards</b>			
<b>Policy Options</b>	<b>SA Objective with Significant Effect</b>	<b>Positive or Negative Impact</b>	<b>Mitigation of Negative Impacts</b>
Chosen Option	<b>Option 1: Create car and cycling parking standards for different uses including non-residential and residential uses, including requirements for electric vehicle charging points, and taking account of different locations which reflect the different levels of accessibility within the town.</b> Option 1 has been chosen, since it is believed that parking standards, including requirements for electrical charging points, represent a more coherent and effective approach to addressing demand for parking in a sustainable fashion.		
Option 1: Create car and cycling parking standards for different uses including non-residential and residential uses, including requirements for electric vehicle charging points, and taking account of different locations which reflect the different levels of accessibility within the town.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+ / + + + +? ++ ++ +	Mitigation not required as no negative impacts identified.
<b>Commentary</b> <p>The main purpose of this policy option is to ensure that levels and types of parking provision are appropriate and sustainable. Owing to the unique characteristics of Crawley, the adequacy of existing parking provision varies widely across the borough, so an assessment of parking standards which reflects the different levels of</p>			

	accessibility within the town will support reduced car travel and minimise climate change. This will also promote effective use of land, ensuring that land can be released to provide new homes and commercial premises where appropriate. Requirements in respect of electrical charging will meanwhile provide more robust support for transition to lower emission, less polluting vehicles.		
Option 2: Do not include car and cycle parking standards and instead seek to address this issue on a case-by-case basis with reference to other policies and the NPPF.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+? ? +? +? - / +? +? +?	
<p><b>Commentary:</b>            The presence of other Local Plan policies relating to design, access and operational needs of development should ensure that there is still potential to promote appropriate and sustainable levels of parking via this option. At the same time there are greater risks of these benefits being limited by an inconsistent approach, and a lack of overarching points of reference or supporting evidence base. In addition, the other policies would provide a significantly weaker basis from which to promote more widespread provision of electric vehicle charging points.</p>			

<b>Policy ST2: Car and Cycle Parking Standards</b>			
<b>Policy Options</b>	<b>SA Objective with Significant Effect</b>	<b>Positive or Negative Impact</b>	<b>Mitigation of Negative Impacts</b>
Chosen Option	<b>Option 1: Create car and cycling parking standards for different uses including non-residential and residential uses, including requirements for electric vehicle charging points, and taking account of different locations which reflect the different levels of accessibility within the town.</b> Option 1 has been chosen, since it is believed that parking standards, including requirements for electrical charging points, represent a more coherent and effective approach to addressing demand for parking in a sustainable fashion.		
Option 1: Create car and cycling parking standards for different uses including non-residential and residential uses, including requirements for electric vehicle charging points, and taking account of different locations which reflect the different levels of accessibility within the town.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+ / + + + +? ++ ++ +	Mitigation not required as no negative impacts identified.
<p><b>Commentary:</b>            The main purpose of this policy option is to ensure that levels and types of parking provision are appropriate and sustainable. Owing to the unique characteristics of Crawley, the adequacy of existing parking provision varies widely across the borough, so an assessment of parking standards which reflects the different levels of accessibility within the town will support reduced car travel and minimise climate change. This will also promote effective use of land, ensuring that land can be released to provide new homes and commercial premises where appropriate.         </p>			

	Requirements in respect of electrical charging will meanwhile provide more robust support for transition to lower emission, less polluting vehicles.		
Option 2: Do not include car and cycle parking standards and instead seek to address this issue on a case-by-case basis with reference to other policies and the NPPF.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+? ? +? +? - / +? +? +?	
<p><b>Commentary.</b></p> <p>The presence of other Local Plan policies relating to design, access and operational needs of development should ensure that there is still potential to promote appropriate and sustainable levels of parking via this option. At the same time there are greater risks of these benefits being limited by an inconsistent approach, and a lack of overarching points of reference or supporting evidence base. In addition, the other policies would provide a significantly weaker basis from which to promote more widespread provision of electric vehicle charging points.</p>			

<b>PolicyST3: Improving Rail Stations</b>			
<b>Policy Options</b>	<b>SA Objective with Significant Effect</b>	<b>Positive or Negative Impact</b>	<b>Mitigation of Negative Impacts</b>
Chosen Option	<p><b>Option 1: To concentrate improvements and development within the vicinity of the rail stations to enhance the specific roles of each station.</b></p> <p>Option 1 has been chosen since broadly, this policy option has a more positive impact on both the natural and built environment, particularly in terms of reducing private motor vehicle travel and ensuring that the built environment is enhanced. In addition, it is believed that promoting development to be situated within the vicinity of rail stations will assist in maintaining the current employment base within the town. Conversely, Option Two does not promote economic growth directly, and as such, this objective is uncertain. In addition, it is also uncertain, without the promotion of developments within the vicinity of the rail stations, whether this option would substantially enhance the built environment. Lastly, Option Three would have a detrimental effect upon the environment, since maintaining the status quo could actually increase private motor vehicle usage as rail access and capacity becomes stretched, and more residents choose to use their private motor vehicle.</p>		
Option 1: To concentrate improvements and development within the vicinity of the rail stations to enhance the specific roles of each station.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+? +? + 0 +? 0 ++ + +?	Mitigation not required as no negative impacts identified.
	<p><b>Commentary</b></p> <p>The main thrust of this policy option is to concentrate development and improvements at rail stations in order to promote the use of rail services, and subsequently to reduce car travel and minimise climate change. It is also posited that this concentration of</p>		

	<p>development and improvements at rail stations will improve economic performance, particularly at Crawley Rail Station, which is likely to act as catalyst for retail development within the town.</p> <p>Although it is not necessarily certain that the sustainable design of developments will be implemented within the vicinity of the rail stations (SA Objective 2), it is envisaged that buildings of high architectural merit will be maintained or improved (SA Objective 3). The current provision of rail infrastructure within the borough could be improved if this policy is realised, since rail patronage would rise, and thus, require further investment (SA Objective 8). It is believed that this policy option will have no significant effect upon creating a healthy and cohesive community (SA Objective 9).</p>		
Option 2: To ensure that the four rail stations within the borough are maintained up to the current standards and to seek improvements to both the accessibility and capacity of rail stations only, without promoting major developments within the vicinity of the rail stations.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	+	
<p><b>Commentary</b></p> <p>The main thrust of this policy option is to improve the rail stations in terms of accessibility and capacity, in order to promote the use of rail services, and subsequently, to reduce car travel and minimise climate change. It is uncertain whether the improvement to the rail stations will improve economic performance substantially without further developments within the vicinity of the rail stations. Furthermore, it is not necessarily certain that the sustainable improvements to the rail stations could be achieved and it difficult to ascertain, without further development potential around the rail stations, whether the built environment could be improved substantially. The current provision of rail infrastructure within the borough could be improved if this policy is realised, since rail patronage could rise, and thus, require further investment. It is believed that this policy option will have no significant effect upon creating a healthy and cohesive community.</p>			
Option 3: This policy option will only look to maintain the status quo and ensure that rail stations and services are not significantly reduced or left to deteriorate.	1. Minimise climate change 2. Adapt to climate change 3. Protect/enhance built environment 4. Decent, affordable homes 5. Maintain/support employment 6. Conserve/enhance biodiversity and landscape 7. Promote sustainable journeys 8. Provide sufficient infrastructure 9. Promote sustainable communities and Encourage active lifestyles	- +? +?	
<p><b>Commentary</b></p> <p>The main direction of this policy option is to ensure that both rail services and the rail stations are maintained at current levels. In terms of achieving a reduction in car travel and minimising climate change, it is thought that only maintaining the current levels of rail infrastructure would have a detrimental impact upon these sustainability objectives, since commuters and other travellers may utilise the private motor vehicle if rail costs and patronage rise. It is uncertain whether the maintenance of the rail stations and services would even sustain economic performance, since the town, without such infrastructure, may become unattractive to investors. It is not necessarily certain that the sustainable improvements to the rail station buildings could be achieved and it is unlikely that the built environment could be improved substantially.</p>			

without further improvements to the rail stations. The current provision of rail infrastructure within the borough would not be improved if this policy is realised, and furthermore, without further development, only a limited amount contributions for infrastructure would be sought. It is believed that this policy option will have no significant effect upon creating a healthy and cohesive community.

Policy ST4: Safeguarding of a Search Corridor for a Crawley Western Relief Road			
Policy Options	SA Objective with Significant Effect	Positive or Negative Impact	Mitigation of Negative Impacts
Chosen Option	<b>Option 4: Include a policy in respect of a western relief road which both safeguards or identifies a route and sets out environmental and other criteria for such a scheme.</b> All options are negative in their overall cumulative impact. The cumulative impact associated with options 1 and 4 are close to those of option 1, to the extent that these are considered to involve the lowest overall negative impact. In comparing options 1 and 4 meanwhile, option 4 is narrowly to be preferred on the basis that the benefits arising from it are more certain, and because the nature of the relief road as a coherent scheme as distinct from a more passive option involves greater scope to mitigate the negative impacts.		
Option 1: Do not include a policy in respect of a western relief road, and seek to address the transport issues associated with economic growth and incremental development within and close to Crawley on the basis of the existing road network, with link roads to support any such new developments, and such sustainable transport improvements as can be accommodated.	1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home 5. Maintain/support employment base 6. Conserve/enhance biodiversity and landscape 7. Reduce car journeys 8. Ensure the provision of sufficient infrastructure 9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles	+ +? - - - / +? - +	
	<b>Commentary</b> This option would reduce the likelihood of existing and increased traffic demand being accommodated by a relief road. The demand would instead have to be accommodated by smaller link routes, and through measures to enable and encourage the use of public transport, walking and cycling. To the extent that this would lead to less use of the private vehicle it would provide benefits in terms of climate change mitigation and adaptation, and encourage more active lifestyles. At the same time, resulting congestion would be likely to make for a less attractive built environment, and the environmental benefits of not adding a new relief road could in some measure be offset by the likelihood that link roads will affect more sensitive areas, including Ifield Brook Meadows SNCI, Rusper Road Playing Fields Local Greenspace, and Ifield Village Conservation Area. Further, increased congestion may constrain wider development capacity in the area.		
Option 2: Include a policy in respect of a western relief road which sets out environmental and other criteria for how such a project should be designed and undertaken, but does not safeguard or identify a specific route.	1. To minimise climate change 2. To adapt to climate change 3. Protect/enhance built environment 4. Ensure everyone has the opportunity to live in a decent and affordable home 5. Maintain/support	- - ? + +	

	<p>employment base</p> <p>6. Conserve/enhance biodiversity and landscape</p> <p>7. Reduce car journeys</p> <p>8. Ensure the provision of sufficient infrastructure</p> <p>9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles</p>	-- - + -	
	<b>Commentary</b> To the extent that this option would indicate that a western relief road would be acceptable in principle, it would have negative impacts in respect of those objectives which are seeking lower levels of traffic and car use in particular. In facilitating travel by private car it would also work to some degree against the objective of promoting healthier lifestyles through active travel and reduced air pollution. A significant negative arises from the fact that no particular route is promoted, so that a wider range of landscape areas and environmental assets are potentially exposed, with only the criteria listed providing a degree of protection. The positives concerning this option on the other hand relate to its role in providing infrastructure support to housing and employment development.		
Option 3: Include a policy in respect of a western relief road which safeguards or identifies a specific route but does not set out environmental and other criteria for how such as project should be designed and undertaken.	<p>1. To minimise climate change</p> <p>2. To adapt to climate change</p> <p>3. Protect/enhance built environment</p> <p>4. Ensure everyone has the opportunity to live in a decent and affordable home</p> <p>5. Maintain/support employment base</p> <p>6. Conserve/enhance biodiversity and landscape</p> <p>7. Reduce car journeys</p> <p>8. Ensure the provision of sufficient infrastructure</p> <p>9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles</p>	- - / + + -- - ++ -	
	<b>Commentary</b> To some extent the impacts associated with this option are similar to those for option 2, in so far as the principle of a new relief road is supported, with the resulting likely impacts in respect of increased travel by private car, with associated emissions, pollutants, and negatives in relation to public health objectives; as well as the positives in respect of adequate infrastructure for Crawley. The difference between the criteria-based option 2 and the area-based option 3 is considered to be that likely negative environmental impacts are narrowed in terms of their area but widened in terms of their degree, owing to a lack of direction over how a relief road should be implemented within the identified area.		
Option 4: Include a policy in respect of a western relief road which both safeguards or identifies a route and sets out environmental and other criteria for such a scheme.	<p>1. To minimise climate change</p> <p>2. To adapt to climate change</p> <p>3. Protect/enhance built environment</p> <p>4. Ensure everyone has the opportunity to live in a decent and affordable home</p> <p>5. Maintain/support</p>	- - / + +	This option has various negative impacts requiring mitigation. Investment in public transport and sustainable transport schemes feeding into the road would be required to mitigate the health and environmental impacts associated with traffic using the road. Highways modelling would be required to confirm how this could be best

	<p>employment base</p> <p>6. Conserve/enhance biodiversity and landscape</p> <p>7. Reduce car journeys</p> <p>8. Ensure the provision of sufficient infrastructure</p> <p>9. Healthy, active, cohesive and socially sustainable communities and Encourage active lifestyles</p>	<p>-</p> <p>-</p> <p>++</p> <p>-</p>	<p>achieved. Landscape impact would need to be mitigated as far as practicable, while biodiversity impacts would need to be accurately identified and provision for net gains ensured.</p>
<b>Commentary</b>			

In seeking to focus and limit the environmental impact of a relief road both in terms of its location and the detailed manner and process of its implementation, this option is considered to involve a lesser negative impact across the sustainability objectives than options 2 and 3, while retaining the benefits of these options in terms of providing adequate infrastructure to support current capacity pressures and growth. At the same time it retains a number of the negative impacts associated with support for a new relief road in relation to climate change mitigation and adaptation, traffic growth, impact on biodiversity and landscape, and public health objectives.