

SUSTAINABILITY APPRAISAL / STRATEGIC ENVIRONMENTAL ASSESSMENT

Post-Adoption Statement For the Crawley Borough Local Plan 2023 to 2040

November 2024

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1.0 Introduction

- 1.1 Crawley Borough Council (CBC) adopted the Crawley Borough Local Plan 2023 to 2040 on 16 October 2024. This followed a six-year period of review. The new Local Plan has fully replaced the previously adopted Crawley Borough Local Plan 2015-2030, adopted in December 2015, as the council's development plan for the borough.
- 1.2 This report comprises the Strategic Environmental Assessment 'Post-Adoption Statement' for the Crawley Borough Local Plan 2023 to 2040. It has been prepared to meet Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations (SI 1633), 2004¹. It sets out how the Crawley Borough Local Plan has been prepared in accordance with the requirements of these Regulations.
- 1.3 The Purpose of this Post-Adoption Statement is to outline how the SEA process has informed and influenced the Local Plan plan-making process, and to demonstrate how consultation on the SEA has been taken into account.
- 1.4 In order to meet the legislative requirements, a Post-Adoption Statement is required to be published "*as soon as reasonably practicable after the adoption of the Plan or programme*".
- 1.5 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. Retained EU law also requires that Strategic Environmental Assessment (SEA) is carried out to ensure that the environmental effects of the Plan are taken into account.
- 1.6 The SA/SEA was an ongoing process throughout the preparation of the Local Plan, which identified the social, environmental and economic impacts of the proposed planning policies and allocations.
- 1.7 In accordance with the Regulations, this statement sets out:
 - a) How environmental considerations have been integrated into the Local Plan;
 - b) How the environmental report has been taken into account;
 - c) How the opinions expressed in response to public consultations² have been taken into account;
 - d) The reasons for choosing the plan as adopted, in light of the other reasonable alternatives dealt with; and
 - e) The measures that are to be taken to monitor the significant environmental effects of the implementation of the Local Plan.

¹ Statutory Instrument 2004 No. 1633, Environmental Protection, The Environmental Assessment of Plans and Programmes Regulations 2004, Part 4: Post-Adoption Procedures: [Microsoft Word - 040630SEA final draft.doc \(legislation.gov.uk\)](#)

² Regulation 13(2)(d) and 13(4)

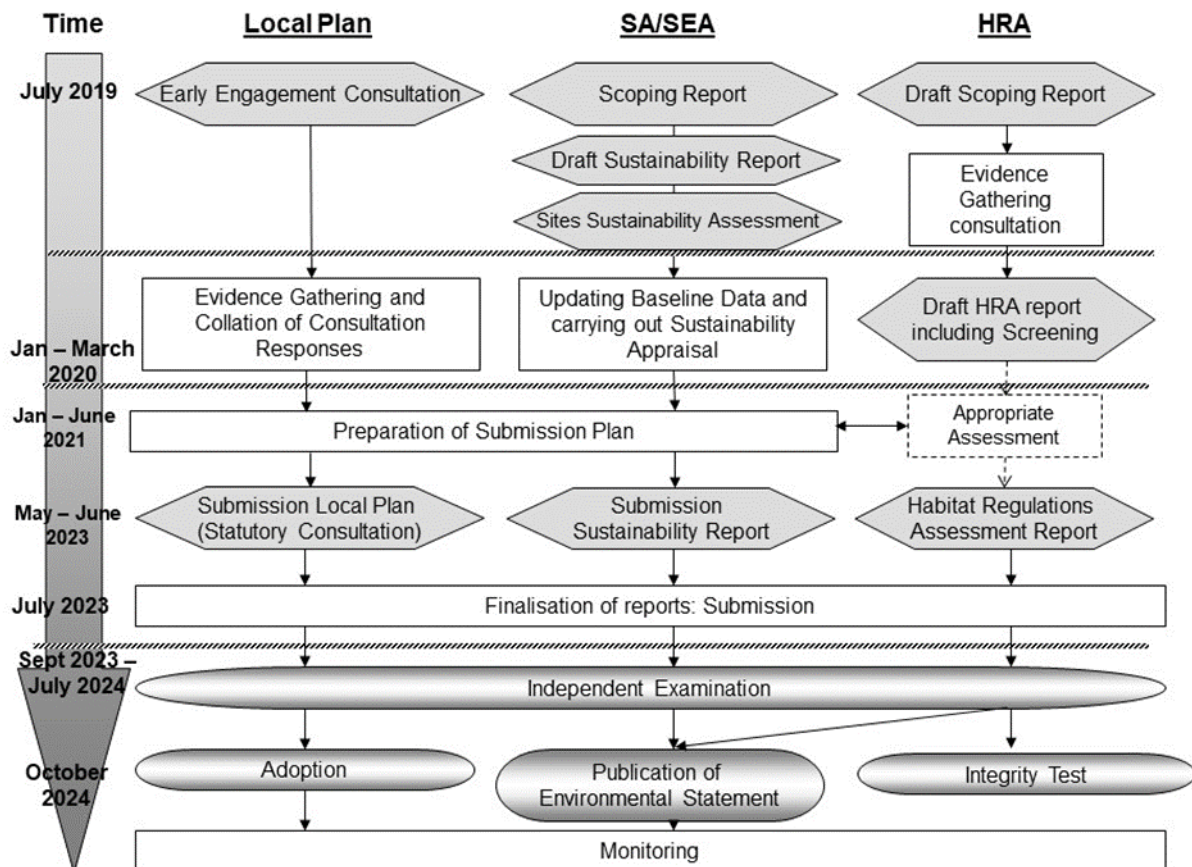
2.0 Environmental Statement

a) how environmental considerations have been integrated into the Local Plan

Sustainability Appraisal/Strategic Environmental Assessment

2.1 Figure 1 illustrates how the process of the SA/SEA has been undertaken alongside the Local Plan to ensure maximum and genuine integration of the issues into the Plan's preparation.

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



2.2 The final SA/SEA Report, October 2024³, outlines the sustainability issues and objectives for Crawley, which were considered in reviewing the previously adopted Crawley Borough Local Plan 2015-2030. The Review took into account the revised National Planning Policy Framework 2021⁴, technical evidence and consultation feedback, and was subject to independent Examination.

2.3 As this Local Plan Review was an update of an adopted Local Plan, the strategic approach and many of the policies were intended to be retained from the previously adopted Local Plan. A Sustainability Appraisal/Strategic Environmental Assessment was carried out previously, which

³ [Sustainability report October 2024.pdf \(crawley.gov.uk\)](#)

⁴ [\[ARCHIVED CONTENT\] \(nationalarchives.gov.uk\)](#)

evolved for every stage in the 2015 Local Plan’s preparation and adoption. The final SA/SEA (2015) was published on adoption of the Local Plan⁵.

- 2.4 As part of the Local Plan Review, the initial SA/SEA Scoping and Draft Report (July 2019) reviewed the previous SA/SEA conclusions and updated these where changes were being proposed. New options were considered against the approach taken in the 2015 Plan.
- 2.5 The SA topic areas are listed in Table 1, with the SEA Directives clearly highlighted where relevant.

Table 1: Consideration of Issues in the SEA Directive by Topic Area

Topic Area		Scope of Topic	Links to SEA Directive
A	Climate Change, Water Neutrality, Sustainability, Sustainable Design and Construction	energy efficiency, flooding, air quality, noise, waste water, waste, climate change and water supply	<i>Material Assets, Water, Air, Climatic Factors</i>
B	Heritage, Character, Design and Architecture	urban design, urban environment, cultural heritage	<i>Cultural Heritage</i>
C	Housing	housing need, aspirations, strategic development locations	
D	Economy	economic growth and social mobility, maximising benefits of Gatwick Airport, revitalised and vibrant town centre	
E	Natural Environment	countryside, landscape, trees, biodiversity, greenways and green open space	<i>Biodiversity, Landscape, Air Quality, Fauna, Flora and Soil</i>
F	Transport and Infrastructure	roads, rail, public transport, walking, cycling, Gatwick Airport, infrastructure	
G	Population, Community Facilities and Open Spaces, Crime and Health of the Community	Demographics, educational establishments, community halls, open space, sport and recreation provision	<i>Population, Human Health</i>

- 2.6 For the first stage of the SA/SEA scoping of the Local Plan, the council collected contemporary information on social, environmental and economic issues in the borough. This is known as the 'baseline' data.
- 2.7 Baseline data for each of the topic areas was collected to establish the existing situation within the borough and set out the most important trends and issues. The baseline data drew upon the evidence base gathered for the development of the Local Plan along with existing information and statistics available from monitoring data, and enabled the key issues facing the borough today to be identified.
- 2.8 The next stage of the process identified and analysed all plans, programmes and policies that could impact upon the Local Plan. These plans, programmes and policies include documents from international to local levels. The documents also provided further information about the

⁵ [Sustainability Appraisal/Strategic Environmental Assessment Post Adoption Statement Sustainability Appraisal/Strategic Environmental Assessment](#) (December 2015)

borough, which were included in the baseline data. The evidence base prepared for the Local Plan has been used as the basis for the SA baseline data where appropriate.

- 2.9 From this information, the social, economic and environmental impacts that may arise from the implementation of the borough's Local Plan were appraised through the assessment of the baseline data. This allowed the current sustainability issues faced by the borough to be identified. These were condensed and refined into nine overarching Sustainability Objectives that were considered whilst proposing any development options or policies for the Local Plan. The Sustainability Objectives were compared with each other and against the overall objectives of the Local Plan. This process enabled any conflicts between the objectives to be identified. By identifying these conflicts, possible ways of reducing or resolving conflicts between Local Plan policies and the achieving of sustainable development could be found. These Sustainability Objectives and Issues are set out in Table 2.

Table 2: Crawley's Sustainability Issues and nine Sustainability Objectives

Crawley's Sustainability Issues:	
1. To mitigate climate change, by taking actions to reduce the concentration of greenhouse gases in the atmosphere.	
Climate Change	Crawley as a dense urban area has a high level of carbon emissions and anticipated development, which will contribute towards the causes of climate change. In addition, it is also identified as an area of radiant energy and subject to serious water stress. Therefore, its adaptation towards climate change will provide opportunities to harness and threats to be addressed.
Energy Supply	Crawley remains an energy- and carbon-intensive economy, with a high level of commercial and transport emissions, a legacy of post-war building stock, and a continuing reliance on gas as a domestic heat source, although emissions are declining and deployment of renewable and low/zero carbon energy infrastructure – notably solar PV and heat networks – is gaining momentum.
Waste	Crawley falls within the West Sussex strategy for managing waste. This promotes sustainable waste management. Crawley Borough Council is 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, located at Redhill. The former Brookhurst Wood landfill is now closed. Reducing overall waste production and increasing the amount recycled, reused or composted will remain a key issue and this will be even more prevalent with the increase in the borough's population in the future. This is likely to put pressure on existing waste management services.
Pollution	Crawley's role as an economic hub and transport interchange means the town's contribution to air, land, water and noise pollution is likely to increase.
Air Quality	In the context of an expanding town and international airport, maintenance of air quality may become increasingly problematic. It is important that opportunities are taken to improve local air quality conditions, and as a minimum, mitigate the impacts of the development through good design and sustainable building measures that promote good air quality.
Noise	Noise from a range of sources has the potential to affect people living, working in and visiting Crawley, particularly aircraft noise in the north of the borough. Due to the urban nature of Crawley noise sources and exposure vary. There are relatively tranquil

Crawley's Sustainability Issues:	
	areas, such as within Crawley's large parks, ranging to much noisier areas close to the M23, Main Employment Areas, and land close to Gatwick Airport. The degree to which this will affect people could be influenced by the proximity of development to noise sources or receptors, and also the future level of growth of Gatwick Airport.
2. To adapt to the effects of climate change by reducing the negative consequences of changes in the climate on people and the environment, or by achieving a positive outcome from the effects of climate change.	
Flooding	Crawley borough falls entirely within the upper reaches of the River Mole catchment, with areas at risk of flooding from fluvial sources. River flooding is not the only source of flood risk; Crawley is at the highest risk of surface water flooding in West Sussex, whilst flood risk from groundwater and sewer sources must also be considered. Development must be planned sustainably with flood risk from all sources in mind to ensure the well-being of its future users over the lifetime of development, whilst ensuring that it does not increase flood risk elsewhere.
Water Supply	The potential for development to be concentrated in the Crawley area may lead to water supply issues, particularly given current levels of serious water stress. The Southern Water Sussex North Water Resource Zone is supplied from a groundwater abstraction in the Arun Valley and it has not been demonstrated, with certainty, that this abstraction is not having an adverse effect on the integrity of Internationally Designated Habitat sites. One way of preventing any further negative impact is to ensure that all new development is water neutral. Water neutrality is defined as 'development which does not increase the rate of water abstraction for drinking water supplies above existing levels'.
3. To protect and enhance the valued built environment and character within the borough through high quality new design and the protection of culturally valuable areas and buildings.	
Quality of Life	There is a need to enhance quality of life to ensure Crawley remains a place where people want to live.
Land Supply	The borough is characterised as a town within a countryside setting. The borough's administrative boundaries run close to the Built-Up Area Boundary in most cases, with Gatwick Airport located within the borough's boundaries to the north. Due to these factors, and the requirement to safeguard land for a possible southern runway at Gatwick Airport, land supply in the borough is severely limited, meaning the borough's abilities to meet its own needs (economic and housing development, infrastructure, and other open space and recreation land requirements) is highly constrained.
Heritage	Crawley's heritage comprises the accumulated physical remains of earlier human settlement and activity in the locality. Crawley's heritage assets include more obvious landmarks such as churches, the High Street, and older village cores, as well as older archaeological remains and modern development from the borough's 'New Town' era. Conservation and enhancement of these assets can improve wellbeing by providing a tangible link to a longer historical story.
4. To ensure that everyone has the opportunity to live in a decent and affordable home.	
Housing Delivery	Local housing delivery is sensitive to the national economic climate.
Housing Stock	The housing stock does not match the need and aspirations of the borough in terms of house type and sizes. The age of much of the existing housing stock means it is unable to meet needs of the borough to manage climate change emissions. The fabric of buildings requires retrofitting in order to secure energy efficiency benefits.
Affordable Housing	Affordable housing provision does not match the significant level of need.

Crawley's Sustainability Issues:	
5. To maintain, support and promote a diverse employment base that can serve the local and sub-regional and regional economy.	
Investment Attractiveness	There is a need to ensure Crawley remains a place where businesses and people want to invest, in order to support sustainable economic growth.
Economic Land Supply and Building Stock	The constrained land supply means there is insufficient land available to meet the development needs of the business and industrial uses. There is a mismatch between the quality of the existing building stock and the current needs of the changing economy, both within the dedicated business areas and within the town centre. A lack of a business hub in Manor Royal leaves a gap in the needs of the businesses located in this area.
Social Mobility and Skills Gap	There is a recognised disparity between the, on average, lower level of qualifications and income achieved by people that live in Crawley and those of the in-commuting workforce, which are on average higher. Therefore, Crawley residents are less likely to access higher-skilled, higher paid jobs. This is reflected in Crawley's position close to the bottom of social mobility rankings published in the 2017 State of Nation report, where Crawley ranked 304th out of 324 local authorities. Significant forecast job growth in Crawley presents the opportunity to maximise skills development and employment opportunities for local people.
Changing Economy	The economic structure of the town is dominated by large scale airport related business, supported by a broader range of sectors including storage & distribution, research and design, and professional services. The recent economic implications arising from COVID-19 have shown Crawley's economy to be very reliant on the aviation sector, and as identified by the Economic Recovery Plan (2021) there is need to support continued economic recovery and diversification
Retail Competitiveness	The retail sector of the town's economy has faced challenges in recent years, particularly as a result of competition from online and out-of-centre retailers, and with shopping habits further evolving as a result of the COVID-19 pandemic. Improvements to the quality and diversity of the town centre has already been taking place in response to this.
Growth of Gatwick Airport	Prior to the COVID-19 pandemic, passenger numbers at Gatwick Airport had been continuously increasing (now returning close to their pre-pandemic peak), which has a positive impact on the local economy, supporting jobs on-airport and also indirectly in the local area, encouraging businesses to locate and invest in Crawley. There is a need to support the continued economic recovery of aviation related sectors, whilst also supporting the diversifying of Crawley's economy so that it is more responsive to change.
Town Centre Neighbourhood	An increasing residential population has seen the town centre becoming a neighbourhood in its own right, increasing the need for supporting facilities to serve the residential population. There is a need to balance the commercial function of the town centre with its role as a place to live. Potential conflicts may occur between amenity-sensitive residential use and the need to support a vibrant night-time and evening economy. A predominance of smaller dwellings and housing mix within the town centre pose challenges to ensure balanced community.

Crawley's Sustainability Issues:	
6. To conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough and minimise harm to those outside Crawley's administrative boundaries from activity 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. Parts of Crawley are supplied water from a groundwater abstraction which cannot, with certainty, conclude no adverse effect on the integrity of Internationally Designated Habitat sites.
7. To reduce car journeys and promote sustainable and alternative methods of transport, whilst ensuring sufficient transport infrastructure is delivered to meet the requirements of the borough.	
Transport Demand	The growth of the town will increase pressures on transport infrastructure that is already approaching capacity. Bus use in Crawley is high, but further improvements to public transport and active travel modes are needed to encourage modal shift towards sustainable transport options. Major new developments can also be planned and designed in a way that both encourages and enables increased transport modal share. Airport-related parking must be sustainably located within the Gatwick Airport boundary. Parking provision requirements can influence car ownership.
8. To ensure the provision of sufficient infrastructure to meet the requirements of the borough.	
Infrastructure provision	The rate of development, particularly residential and also airport growth, requires careful management to ensure that it does not outstrip the borough's infrastructure.
Sewerage	The potential for development to be concentrated in Crawley may lead to sewerage capacity problems.
Community Facilities	The changing population demographics are creating a mismatch between the need for housing and community facilities and current provision. Over-demand on leisure facilities means these are nearing capacity.
9. To promote healthy, active, cohesive and socially sustainable communities. To ensure all benefit from a good quality of life. To ensure everyone has the opportunity to participate in sport and to encourage active lifestyles.	
Ethnic Diversity	The population of Crawley is notably diverse in comparison to the national average resulting in specific development demands.
Young Population	Crawley has a high proportion of young children compared with other West Sussex local authorities. The educational attainment of children qualifying for free school meals in Crawley is notably below average.
Ageing Population	Due to its New Town history, Crawley has an increasingly ageing 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.

Crawley's Sustainability Issues:	
Arts & Culture	Crawley's population has a low participation rate in arts and cultural activities. Low levels of cultural economic opportunities or businesses.
Crime	There is a need to reduce crime and the perception of crime.
Health	Physical activity in the borough is below average.
Health Care	Provision of health facilities and services is at or over capacity in most parts of the borough, e.g. GP provision.
Open Space, Sport and Recreation	Increasing demand on parks, sports facilities and open spaces means these are nearing capacity. The lack of development land is increasing the threat to open spaces and sport and recreation facilities within the urban environment.

- 2.10 The emerging strategy, policies and allocations and designations options in the Local Plan were assessed against Sustainability Objectives (as summarised below in Section b of this Post-Adoption Statement).
- 2.11 The preparation of the SA/SEA followed 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 early scoping work and previous draft reports (consulted upon between July and September 2019⁶; between January and March 2020⁷; and between January and June 2021⁸) were taken into consideration whilst finalising the Crawley Local Plan for Full Council approval for Publication and Submission⁹. It was then reviewed further in light of the proposed Main and additional Modifications agreed through the Examination process and was published alongside the Modifications Consultation¹⁰ for comment. It was finalised following the receipt of the Inspectors' Final Report, September 2024¹¹, taking into account the required Main Modifications set out in Appendix 1 to that Report.

Habitats Regulations Assessment

- 2.12 The Conservation of Habitats and Species Regulations 2017¹² require an Appropriate Assessment (known as Habitats Regulations Assessment (HRA) in the UK) to be undertaken. HRA assesses the impact of land-use plans against the conservation objectives of European Sites within certain distances of the borough (15km has been used in the case of Crawley). The HRA ascertains whether the Local Plan's proposals would adversely affect the integrity of a site on its own, or in combination with the plans of neighbouring authorities.
- 2.13 In tandem with the initial SA/SEA Reports (July 2019 and January 2020), the council prepared an initial draft HRA Screening Report (published July 2019¹³ and January 2020¹⁴). The findings of the Screening Report suggested that there is no significant likelihood of adverse impacts on protected sites from the implementation of the plan. No comments were received on the HRA Screening Report, during the formal consultation periods held in July-September 2019 or

⁶ [PUB353178.pdf \(crawley.gov.uk\)](#)

⁷ [PUB354561.pdf \(crawley.gov.uk\)](#)

⁸ [Draft Sustainability Appraisal January 2021.pdf \(crawley.gov.uk\)](#)

⁹ [3. Sustainability Appraisal SA,SEA Report May 2023.pdf \(crawley.gov.uk\)](#)

¹⁰ [Sustainability appraisal - Strategic Environmental Assessment Modifications Consultation report February 2024.pdf \(crawley.gov.uk\)](#)

¹¹ [Crawley Borough Local Plan Inspectors' final report September 2024.pdf](#)

¹² [The Conservation of Habitats and Species Regulations 2017 \(wychavon.gov.uk\)](#)

¹³ [PUB353179.pdf \(crawley.gov.uk\)](#)

¹⁴ [Habitats Regulations Assessment of Crawley Local Plan January 2020.pdf](#)

January-March 2020, to suggest the conclusions of the Report were incorrect or fundamentally flawed.

- 2.14 A draft HRA Report (January 2021¹⁵) was prepared to support the consultation on the Local Plan between January and June 2021. This highlighted that additional work was needed in relation to air quality and water supply.
- 2.15 An updated HRA Report¹⁶ was published alongside the Submission SA/SEA (January 2023). A screening assessment was undertaken which identified a number of Likely Significant Effects (LSEs) associated with the Local Plan. Taking no account of mitigation measures these had the potential to affect the following Habitats sites:
- Ashdown Forest SAC and SPA – air quality LSEs in-combination;
 - Mole Gap to Reigate Escarpment SAC – air quality LSEs in combination;
 - Mole Gap to Reigate Escarpment SAC – hydrology LSEs alone;
 - Arun Valley SAC – hydrology LSEs alone;
 - Arun Valley SPA – hydrology LSEs alone;
 - Arun Valley Ramsar – hydrology LSEs alone; and
 - The Mens SAC – habitat loss and fragmentation (at functionally linked land due to knock on hydrological LSEs) LSEs alone.
- 2.16 The HRA progressed to an Appropriate Assessment which looked at the impacts of a change in air quality, water quality and quantity, and impacts upon functionally linked land upon the qualifying features and conservation objectives of each Habitats site.
- 2.17 The Appropriate Assessment took into consideration the outputs of detailed air quality modelling and water quality modelling to inform the conclusions of the Appropriate Assessment. Planning policy has also been informed by a large piece of work that was commissioned by the council and other affected LPAs within the Sussex North WRZ to ensure all Local Plans (both alone and in-combination) would achieve water neutrality. Required mitigation is secured through policies within the Local Plan itself and through the wider environmental protection framework.
- 2.18 On the basis of the Appropriate Assessment, the HRA concluded that the Local Plan would have no adverse impact on site integrity (AIOSI) at any Habitats site, either alone or in-combination.
- 2.19 The HRA was reviewed against the proposed Modifications subject to that stage of public consultation¹⁷, and confirmed its previous conclusions.
- 2.20 The Local Plan adoption was supported by a Habitats Regulations Integrity Test report¹⁸ which summarised the process and findings of the HRA. It concluded that, following the appropriate assessment and the consideration of all mitigation measures, CBC was able to ascertain that the Crawley Borough Local Plan 2023-2040 would not adversely affect the integrity of any European site. In making that decision, CBC took account of the potential for the project to contribute to cumulative effects of other plans or projects.

b) how the environmental report has been taken into account

- 2.21 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

¹⁵ [Draft Habitats Regulations Assessment of Crawley Local Plan January 2021.pdf](#)

¹⁶ [Introduction \(crawley.gov.uk\)](#)

¹⁷ [Crawley Borough Local Plan Main Modifications Habitats Regulations assessment report February 2024.pdf](#)

¹⁸ [Habitats regulations assessment integrity test October 2024.pdf \(crawley.gov.uk\)](#)

measures can be proposed and put in place. Therefore, these processes can improve the overall sustainability of the plan being prepared.

- 2.22 The Local Plan Review offered the council the opportunity to reassess existing policies in light of new national and local priorities, guidance and evidence and to consider potential new policies for their inclusion in the Local Plan. In scoping the extent of the Local Plan Review, the following high-level options for undertaking the update to the borough's Local Plan were reconsidered:
- Option 1: Preparing a Joint Plan with one or more neighbouring authorities;
 - Option 2: Partial Review of specific policies and 'Saving' some existing policies;
 - Option 3: Comprehensive Review of the adopted Local Plan, maintaining overall strategic approach, continuing Duty to Cooperate discussions, and taking a policy-by-policy approach to the degree of amendment or retention of individual policies. Considering new policies to be introduced through the plan-making process;
 - Option 4: as with Option 3, but including a restructure of the Plan sections and chapters;
 - Option 5: Starting from a blank page and creating a new strategic spatial strategy and a completely new full set of policies; and
 - Option 6: Do not update the Local Plan and publish the review confirming the Plan is in conformity with national policy.
- 2.23 The options analysis concluded that Option 4 would allow the greatest degree of accountability for the Local Plan and ensure it remained robust and up-to-date beyond the five-year adoption date of the Crawley Borough Local Plan 2015 to 2030. This option allowed for the baseline evidence to be updated where necessary, new policies to be considered, and existing policies to be reassessed and aligned in light of updated national and local positions.
- 2.24 On this basis, Option 4: a Comprehensive Review of the adopted Local Plan, taking a policy-by-policy approach to the degree of amendment or retention of individual policies, and considering new policies, including a restructure of the Plan sections and chapter, was taken.

Spatial Strategy Options

- 2.25 In considering the Chosen Option, to retain the Spatial Strategy from the existing adopted Local Plan, the previous Sustainability Appraisal was reconsidered, to ensure the outcomes continue to offer the best approach to pursue. The assessment included three scenarios:
- Scenario 1: A sub region with a South East regional focus;
 - Scenario 2: A sub regional focus;
 - Scenario 3: A Crawley Borough focus.
- 2.26 A combination of Scenario 2 (a Sub-Regional Focus) and Scenario 3 (a Crawley Borough Focus) was chosen, again, as creating the most realistic and deliverable Local Plan to maximise sustainable development opportunities whilst protecting the quality of the environment for local residents, businesses and visitors.
- 2.27 The Local Plan Review offered the opportunity to update the scenarios, to introduce additional policies to reduce further the uncertainties identified in the SA appraisal initially, and to commission evidence which specifically provides intelligence on the particular needs and markets associated with Crawley.
- 2.28 For Scenario 2 (sub regional focus), this included understanding the housing needs for specific groups within Crawley, including in terms of affordability, type and size mix of housing, as well as recommending an "At Crawley" approach for the purposes of Duty to Cooperate, and identifying the infrastructure needs both arising from within Crawley and also to provide a baseline against which the cumulative impacts of any further growth of Crawley can be

assessed. It also allowed for the introduction of new policies in relation to water neutrality and the safeguarding of an area of search for a potential western link multi-modal transport corridor, where this runs through Crawley.

- 2.29 For Scenario 3 (Crawley borough focus), this allowed for the introduction of policies seeking to increase densities and maximise effective use of land, whilst securing high quality design and form which complement the character of Crawley. In addition, the housing typology policies allow for a greater policy framework for positive planning on the windfall sites which will come forward over the Plan period. The extent of the safeguarding required for further expansion of Gatwick Airport was assessed to open up potential opportunities for balancing the needs of the Airport with other economic needs.

Local Plan Policy Appraisal

- 2.30 Each Local Plan Policy and associated options were assessed against the objectives of the Sustainability Appraisal as part of their preparation, on an individual basis. The results of this analysis are set out in detail in Appendix F of the final SA/SEA Report (October 2024). The overview of this broad Sustainability Appraisal assessment of the submission policies can be seen below in Table 3.

- 2.31 Each Policy was assessed against the separate Sustainability Objectives (set out in Table 2 above), against a simplified criteria of:

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

- 2.32 This analysis has shown that whilst in the majority of cases the chosen policy has a positive or no impact on the sustainability objectives, there remains a need to consider mitigation to minimise or neutralise any outstanding potential negative impacts. In addition, it was determined that in some cases the chosen option would not represent the most sustainable approach but was selected since more sustainable alternative options would not necessarily comply with national planning legislation (including the NPPF), or where selection of that option might result in development viability or delivery concerns. Therefore, the submission Local Plan policies chosen are believed to be the most sustainable having assessed reasonable and realistic alternatives.

- 2.33 Following the assessment of each policy, the results were tabulated, which meant that it was possible to identify complementary policies and where there were areas of conflict. The main findings from this Sustainability Appraisal are as follows:

- The assessment of the Local Plan policies generally found that the policies had positive effects for social and economic Sustainability Objectives, but had uncertain or less positive impacts for the environment. This was expected when considering the pressing need for both additional housing and employment space in the borough.
- The policies protecting the character, design, heritage and environment of the borough work harmoniously to protect both the built and natural environment of the borough and its setting. These policies also have a positive effect on ensuring healthy, active, cohesive and socially sustainable communities and encouraging active lifestyles. However, the

combined effect of these policies limits the overall amount of land which is available for development.

- Key housing and employment sites and main employment areas have been identified within the Local Plan to meet as much of the development needs of the borough as is considered to constitute sustainable development, following site-specific Sustainability Appraisals for each of the proposed or rejected development sites.
- In some circumstances it was not possible to make any firm conclusions regarding either the positive or negative effects of a policy on a number of sustainability objectives. For example, levels of crime or decisions of private companies to locate within the town are only partly based on planning policies within the Local Plan.
- The majority of the policies have combined to have an overall positive impact for the economy.

2.34 Once the individual and joint impacts of policies within the Local Plan had been assessed, the most significant impacts were identified. In general, the most significant negative effects relate to the impact on the countryside setting and environmental designations, increased infrastructure need and the effects of traffic, including those arising as a consequence of Gatwick Airport.

2.35 Beneficial impacts include an increase in the number of affordable homes, new employment floorspace, and the maintenance and improvement of the character of Crawley, which retains its neighbourhood principle approach.

Table 3: Crawley Borough Local Plan Policy Sustainability Assessment

Local Plan Policy	SA Objective								
	1	2	3	4	5	6	7	8	9
SD1	++	++	++	+	+	++	++	++	++
SD2	+	0	0	0	0	+	+	+	+
CL1	+	+	++	++	+	+	++	++	++
CL2	++	++	++	++	+	++	++	+	++
CL3	++	++	+	++	+	+	++	++	++
CL4	++	++	/	++	+	?	++	+	+
CL5	++	++	++	++	+	++	++	+	+
CL6	+	++	++	+	+	++	+	+	++
CL7	+	0	++	+	0	++	0	0	+
CL8	+	/	++	/	/	+	+	/	+
CL9	/	/	+	/	/	++	/	+	+
DD1	++	++	+	+	/	+	+	+	+
DD2	0	0	+	++	+	0	+	/	++
DD3	++	+	0	++	0	0	+	0	+
DD4	++	++	++	/	/	++	+	/	+
DD5	0	0	++	+	+	0	0	0	++
DD6	0	0	++	0	+	++	0	0	+
DD7	?	-	?	0	0	+	-	0	0
HA1	0	?	++	0	/	0	0	0	+
HA2	0	?	+	0	/	0	0	0	+
HA3	0	?	++	0	0	+	0	0	+
HA4	0	?	+	0	/	0	0	0	+
HA5	0	?	++	0	/	0	0	0	+
HA6	0	0	++	0	/	+	0	0	+
HA7	0	+	+	0	/	+	0	0	+
OS1	+	+	+	+	+	++	+	+	++
OS2	+	++	+	0	/	+	+	++	++
OS3	+	0	+	0	0	+	++	+	++
IN1	+	+	0	+	+	+	+	++	+
IN2	+	+	/	0	+	+	+	+	+
IN3	+	+	+	+	+	+	+	++	+

Local Plan Policy	SA Objective								
	1	2	3	4	5	6	7	8	9
EC1	?	?	+	+	++	+	+	+	++
EC2	+	+	+	+	++	+	+	+	++
EC3	+	+	++	0	++	0	+	+	+
EC4	?	+	+	+	++	-	+	+	+
EC5	+	+	+	+	++	0	+	0	+
EC6	+	?	+	0	++	0	0	0	+
EC7	+	+	+	0	+	0	++	0	0
EC8	0	0	0	0	+	0	+	0	0
EC9	0	0	0	0	++	0	0	0	+
EC10	0	0	+	0	+	0	0	0	+
EC11	0	0	++	++	++	0	?	?	+
EC12	+	+	++	?	+	0	++	++	++
EC13	+	0	+	0	+	-	0	+	0
GAT1	-?	?	0	0	++	+	+	+	0
GAT2	+	+	+	+	++	-?	+	+	+
GAT3	-	-	0	0	/	-?	-	/	0
GAT4	0	0	0	0	+	0	+	0	0
TC1	0	0	+	+	++	0	++	+	++
TC2	+	+	+	+	+	0	+	++	++
TC3	+	+	++	++	++	0	++	+	++
TC4	+	+	++	0	0	0	0	0	++
TC5	++	+	++	0	++	0	++	+	+
H1	/	/	/	-?	-?	/	/	/	/
H2	0	+	+	+	0	+	+	+	++
H3	0	+	++	+	0	++	0	?	++
H3a	+	+	++	++	0	/	0	0	++
H3b	0	/	++	+	0	++	0	0	+
H3c	0	/	++	+	++	0	++	/	++
H3d	0	0	++	++	0	0	++	++	+
H3e	++	0	+	++	++	0	+	0	++
H3f	0	+	+	+	0	++	0	++	++
H4	0	0	0	+	0	0	0	0	+
H5	0	0	0	++	++	0	0	0	++
H6	0	0	0	++	++	0	0	0	++
H7	+	+	+	++	+	0	0	0	+
H8	0	0	?	+	0	-	0	0	+
H9	0	0	0	+	0	0	0	0	+
GI1	++	++	++	0	0	++	++	++	++
GI2	++	+	+	/	/	++	/	/	+
GI3	++	++	++	/	/	++	0	+	+
GI4	+	+	0	0	0	++	0	++	++
SDC1	++	++	+	++	++	+	0	0	++
SDC2	++	0	0	+	+	0	0	+	+
SDC3	+	++	0	+	0	++	0	0	+
SDC4	++	++	0	-	-	++	0	0	+
EP1	0	++	++	?	?	++	0	+	+
EP2	/	+	0	0	0	+	0	+	+
EP3	++	++	++	+	0	+	0	0	++
EP4	0	0	0	++	+	0	0	0	++
EP5	++	++	0	0	0	++	0	0	++
EP6	++	++	++	+	0	+	0	0	++
ST1	+	+	+	+	+	+	++	+	+
ST2	+	/	+	+	+	+	++	++	+
ST3	+	+	+	0	+	0	++	+	+
ST4	-	-	/	+	+	-	-	++	-

2.36 In order to minimise any negative effects of the chosen Local Plan policies, a number of mitigation measures have been identified and incorporated (set out in detail in Appendix F of the final SA/SEA Report). The main mitigation measures are as follows:

- Other policies within the Local Plan, when considered as a whole, have the potential to counteract the negative impacts of policies on a particular Sustainability Objective.
- Through the Sustainability Appraisal process, amendments to the wording of Local Plan policies have reduced the potential negative impact.
- The main negative effects arising from the proposed policies and allocations/designations will be given additional consideration and further mitigated against within other Local Plan policy documents, such as Supplementary Planning Documents.
- In addition, environmental impacts can be mitigated against at the planning application stage, either through in-depth ecological reports and/or an Environmental Impact Assessment (EIA). Planning conditions will also play a role in ensuring that potential negative effects of development are addressed.

Local Plan Site Allocations and Designations

2.37 The Sustainability Appraisal Objectives provided the basis for the site allocation/designation appraisal. From this, individual criteria questions and topics were identified. These topics and criteria were used to assess the various site options for the Local Plan and how they could contribute towards the sustainable development of the borough more generally. By the very nature of the Sustainability Objectives considered, several of the issues are cross-cutting and impact upon a number of other sustainability issues.

2.38 The Sustainability Objectives, key topics, assessment considerations and criteria used for the assessment of the sites for allocation and designation are set out in the table below. It should be noted that these considerations are not definitive, and more detailed assessment work may be necessary for the detailed design of allocations for planning permission (where applicable).

Table 4: Site Allocations and Designations Sustainability Appraisal Criteria

Sustainability Objective	Key Topics for Site Allocations	Sample Assessment Criteria
1. To mitigate climate change, by taking actions to reduce the concentration of greenhouse gasses in the atmosphere.	Reduction in Carbon Dioxide Emissions; Reduction in Water Consumption; Reduction in Other Greenhouse Gas Emissions; Environmental Health	Is the construction of the site going to meet high standards of energy efficiency? Is the need to travel reduced through the location of the site? Are developments of significant scale designed to high or moderate density, to create efficiencies in the use of resources, including energy supply, services and transportation. And specifically in regard to public transport, are such developments taking advantage of existing or providing for the expansion or connection to frequent and reliable options? Does the layout of pathways for new development encourage walking and cycling? Is the site contaminated or are there pedestrian pathways linking the site with contaminated land? Can the site be remediated? Is the development impacted by noise (through adjacent road, airport, rail or industrial usage), or will the site itself result in noise increases? Will the development site impact negatively or

Sustainability Objective	Key Topics for Site Allocations	Sample Assessment Criteria
		<p>positively on air quality? Will the development maintain or enhance water quality in rivers or groundwater?</p>
<p>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.</p>	<p>Flood Risk and Drainage; Sustainable Development Design; Effective Water Management</p>	<p>Are site proposals located away from areas that are high risk flooding zones, now or in the future? Are flood mitigation or resilience measures incorporated into new development proposals? Is the site subject to water neutrality, and if so, has water neutrality been demonstrated?</p>
<p>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.</p>	<p>Protection and Enhancement of the Built Environment</p>	<p>Would the development proposal impact upon the setting of a Listed Building, Conservation Area or Locally Listed Building? If so, could a negative impact on the heritage asset be mitigated appropriately? Have major development proposals demonstrated and documented how the positive and valued components of existing, wider area, rural/urban structure have guided and directed the form of new development. Are proposals designed so that they respect, protect, build upon and enhance the positive aspects of existing character, significance and distinctiveness of both the site and wider area?</p>
<p>4. To ensure that everyone has the opportunity to live in a decent and affordable home.</p>	<p>Meeting Housing Need; Meeting Affordable Housing Need; Meeting GTTS Accommodation Need</p>	<p>How does the proposal address housing needs in the borough? Would the proposal deliver an element of affordable housing? How does this provision meet the housing needs or the accommodation needs of the GTTS community? Has new development identified, tested and (where appropriate) embraced opportunities for increased density?</p>
<p>5. To maintain, support and promote a diverse employment base that can serve the local and sub-regional and regional economy.</p>	<p>Economic Development</p>	<p>Would the development proposal assist in maintaining, supporting or enhancing the local economy of the area? Would the development support the delivery of business land and/or floorspace? Would the development support delivery of other forms of employment? Would the development support the vitality and viability of Crawley Town Centre?</p>
<p>6. To conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough.</p>	<p>Protection of Environmental Designations; Conservation and Enhancement of Biodiversity Habitats</p>	<p>Would the development proposal impact upon an existing or future environmental designation (such as a SAC/SPA/Ramsar Site, SSSI, Local Wildlife Site or the National Landscape)? Will there be any loss to biodiversity, or damage to the landscape as a result of the delivery of the site? Will there be opportunities for increasing or enhancing environmental habitats through a</p>

Sustainability Objective	Key Topics for Site Allocations	Sample Assessment Criteria
		<p>development site?</p> <p>Will the development achieve water neutrality?</p> <p>Have major proposals demonstrated and documented how the positive and valued components of existing, wider area, rural/urban structure have guided and directed the form of new development?</p> <p>Are proposals designed so that they respect, protect, build upon and enhance the positive aspects of existing character, significance and distinctiveness of both the site and wider area?</p>
<p>7. To reduce car journeys and promote sustainable and alternative methods of transport, whilst ensuring sufficient transport infrastructure is delivered to meet the requirements of the borough.</p>	<p>Sustainable Transport: Highways/Rail Cycling/Pedestrian</p>	<p>Would the development increase highway and/or rail usage and would this have a detrimental impact upon highway and/or rail congestion?</p> <p>Is the site proposal located in close proximity to sustainable transport links in order for the occupants to reach essential services and facilities?</p> <p>Is the need for a 'private' car reduced?</p> <p>Has new development identified, tested and (where appropriate) embraced opportunities for increased density so as to achieve a minimum of 60 dwellings per hectare (i.e. that considered necessary to sustain a dependable, frequent and high-capacity public transport service)?</p> <p>Are new significant scale proposals located beside existing or providing appropriate levels of accessibility to enhanced public transport services?</p> <p>Is the site close to both the pedestrian and/or cycling network?</p> <p>Does the layout of pathways for new development encourage walking and cycling?</p>
<p>8. To ensure the provision of sufficient infrastructure to meet the requirements of the borough.</p>	<p>Infrastructure Provision; Water/Sewerage Facilities; Telecommunications; Energy Provision</p>	<p>What is the capacity of the site to ensure that sewage can be adequately treated?</p> <p>Would the development site be designed to be connected to high quality telecommunication systems?</p> <p>Is the site likely to provide additional renewable energy provision as part of the new development?</p> <p>Is the site close to existing gas/electricity/ water mains? Is there sufficient capacity of current local physical connections?</p> <p>Is a contribution required to fund or part-fund the delivery/improvement or expansion of sustainable transport infrastructure?</p>
<p>9. To promote active, cohesive and socially sustainable communities and To ensure everyone has the opportunity to participate in sport and to encourage active, healthy and</p>	<p>Community Facilities; Neighbourhood Centres; Reuse of Previously Developed Land; Health Facilities;</p>	<p>Are sites located reasonably close to neighbourhood centres and/or community centres? Are the sites located within the Built-Up Area Boundary (BUAB)?</p> <p>Is the site allocation re-using previously developed land?</p>

Sustainability Objective	Key Topics for Site Allocations	Sample Assessment Criteria
independent lifestyles.	Education Facilities; Leisure Facilities	<p>Is the site likely to put people before traffic and encourage walking and cycling by establishing a layout of pathways and have ‘secured by design’ principles implemented within the development design?</p> <p>Is the site located in close proximity to existing leisure and recreation facilities?</p> <p>Is the site located in close proximity to existing health facilities?</p> <p>Is the site located in close proximity to existing local schools?</p> <p>Will amenity areas be provided in association with the site?</p> <p>Is the potential site capacity of the allocation likely to increase the numbers of users for local facilities (such as schools, GP surgeries) and would this have a detrimental impact upon such local facilities?</p> <p>Would the development of a site mean the loss of formal or informal playing fields or other open space? Would the development have an impact on existing open space and would this be mitigated?</p>

- 2.39 Each known potential Local Plan housing allocation, Town Centre Key Opportunity Site, strategic employment allocation, Main Employment Area designation and protective designation for the Local Plan was assessed against the objectives of the Sustainability Appraisal as part of their analysis on an individual basis. For each site, both the immediate and future impacts that are predicted for each of the key sustainability objectives were identified and ascribed either a positive, negative neutral or uncertain impact and colour coded in accordance with the criteria set out in paragraph 2.31 above.
- 2.40 A more detailed commentary is provided in Appendix G to the final SA/SEA Report (October 2024) to assist in explaining the reasons for ascribing the impacts in each case and giving an overall conclusion on each site’s suitability. A consistent approach, using the same criteria, was used in the SA/SEA assessment of all the sites. In addition, the detailed commentary clarifies if there are any ‘show-stoppers’, which would fundamentally stop the potential development from coming forward, in financial or planning terms.

Water Neutrality

- 2.41 All of Horsham District, most of Crawley Borough, and parts of Chichester District, Mid Sussex District and the South Downs National Park fall within the Southern Water Sussex North Water Resource Zone (WRZ) as shown in Figure 2. Joint working in relation to water supply in these areas has been taking place since 2020.
- 2.42 Natural England initially raised concerns in relation to water supply and the impact groundwater abstraction at Pulborough could be having on protected sites within the Sussex North Water Resource Zone in a letter to JBA Consulting (stakeholder feedback on the Gatwick sub-region Water Cycle Study) on 25th March 2020. On 14th September 2021, the authorities received a Position Statement from Natural England, formally advising them of Natural England’s concern that water abstraction for water supplies could be having a negative impact on the wildlife sites in the Arun Valley. Natural England advised that any new development taking place in the area must not add to this negative impact.

“The Sussex North Water Supply Zone includes supplies from a groundwater abstraction which cannot, with certainty, conclude no adverse effect on the integrity of;

- Arun Valley Special Area Conservation (SAC)
- Arun Valley Special Protection Area (SPA)
- Arun Valley Ramsar Site.



As it cannot be concluded that the existing abstraction within Sussex North Water Supply Zone is not having an impact on the Arun Valley site, we advise that developments within this zone must not add to this impact.”

Natural England’s Position Statement for Applications within the Sussex North Water Supply Zone September 2021 – Interim Approach

- 2.43 The full Position Statement can be accessed directly through the council’s Water Neutrality webpage: [Water neutrality position statement.pdf \(crawley.gov.uk\)](https://www.crawley.gov.uk/Document/Information/2021/09/21/Water%20Neutrality%20Position%20Statement.pdf). It affects all land that falls within the Southern Water Sussex North Water Resource Zone.

Figure 2: Southern Water Sussex North Water Resource Zone



-  Sussex North Water Resource Zone (Water Neutrality)
-  Bamber/Upper Beeding (Sussex North Water Resource Zone, No Offsetting)

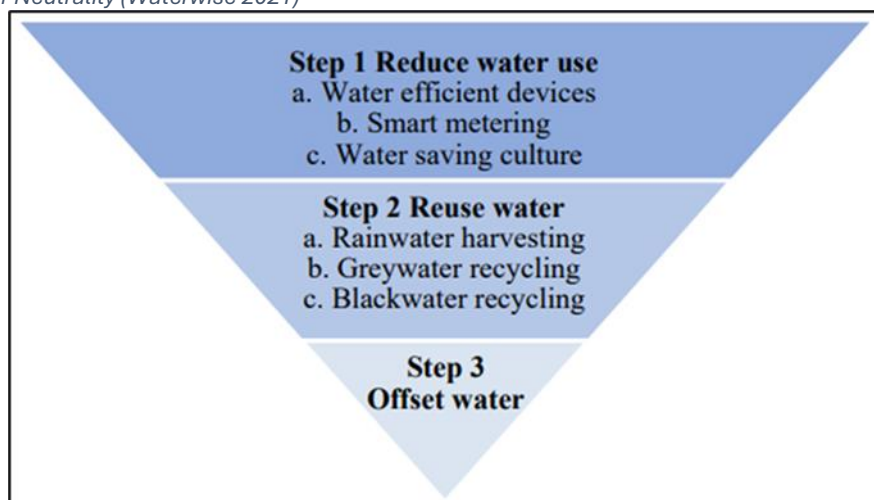
- 2.44 The water supply in question is sourced from abstraction points in the Arun Valley, which also includes locations such as Amberley Wild Brooks Site of Special Scientific Interest (SSSI), Pulborough Brooks SSSI and Arun Valley Special Protection Area/ Special Area of Conservation (SPA/SAC) and Ramsar site (the Arun Valley Sites). The Arun Valley Sites are of international importance because of their inland water bodies, bogs, marshes, humid grassland, other water-dependent habitats, and overwintering waterfowl.
- 2.45 The Habitats Regulations 2017 (as amended) requires Local Authorities to demonstrate that there is no adverse ‘in combination’ impact on the integrity of SPAs and SACs. This means that by law, the councils must prepare Local Plans that clearly show that they will not, either alone or in combination, have an adverse (or negative) effect on these important wildlife sites.

- 2.46 One way of preventing any further negative impact is to ensure that all new development is water neutral. Water neutrality is defined as ‘development which does not increase the rate of water abstraction for drinking water supplies above existing levels’. This means that for every new development, total water use in the region after the development must be equal to or less than the total water-use in the region before the new development.
- 2.47 Water neutrality has significant implications for Local Plans, Neighbourhood Plans and Development Management across the Sussex North Water Resource Zone. Since September 2021, only planning applications that can demonstrate that they will not have an additional demand impact on water supply have been able to be permitted. A limited number of applications have been approved on this basis. However, it is difficult to do this on an individual basis because the Habitats Regulations require an analysis of ‘in combination’ impacts. A Water Neutrality Strategy is now complete, supporting the Local Plan, and ensuring that in-combination impacts of planned development across the Water Resource Zone have been assessed. Work is currently progressing on the Implementation Scheme, which is referred to as the Sussex North Offsetting Water Scheme (SNOWS).
- 2.48 The affected local authorities worked together closely to ensure that their Local Plans take a consistent approach which will ensure ‘in combination’ water neutrality. Whilst the different timelines for progression of the plans means that it is not possible to have a joint set of plan policies or a formal joint SA, the authorities have closely aligned their work, and the evidence underpinning the Plans has been undertaken jointly.
- 2.49 Detail of the progress and work that took place is set out in the Local Authorities’ Joint Water Neutrality Topic Paper (May 2023). The full Sustainability Appraisal process is set out in Chapter 6 (and relevant supporting sections of the appendices) of the final SA/SEA Report (October 2024). A summary of the evidence secured to advise the authorities on this matter is set out in the paragraphs below.
- 2.50 The first stage of the work on water neutrality was carried out prior to Natural England issuing their Position Statement in September 2021. This arose from the joint Water Cycle Study commissioned by Crawley Borough, Horsham District, Mid Sussex District and Reigate and Banstead Borough Councils (August 2020). The advice from Natural England at that time was that water resources could only be addressed at a strategic level through Local Plans. Since the Water Supply Zone affected also included Chichester District, but not Reigate & Banstead Borough, the three Local Authorities, in discussion with Natural England and HRA consultants appointed by the councils, agreed to undertake further evidence work through a joint commission, this being the Water Neutrality Study undertaken by JBA Consulting. Part A of the Water Neutrality Study, looking at planned growth in each borough/district, was prepared on an individual Local Authority basis, with JBA preparing the evidence jointly for Chichester District and Crawley Borough (July 2021), and AECOM providing the evidence for Horsham District (July 2021).
- 2.51 The second stage of the work (Part B) considered the total (or cumulative) impact of proposed development in all the Local Planning Authority areas that use Sussex North Water Resource Zone. This included consideration of planned growth within the WRZ, as advised by South Downs National Park and West Sussex County Council. The purpose of this work was to understand how water demand may increase in the future and work out how much water will need to be ‘offset’ to mitigate the impacts of development through Water Neutrality. This work was completed and published in April 2022.
- 2.52 The third stage of the work (Part C) built upon and updated the previous work and set out a joint water neutrality strategy for all affected authorities. This included recommending a policy approach with regards to water efficiency standards in new development and setting out principles for an offsetting scheme, which together would allow the growth identified in Local

Plans to come forward achieving water neutrality. The report for this stage of work was published in December 2022, having been agreed as a basis for ongoing joint work by the commissioning local authorities' Chief Executive Officers, and endorsed by Natural England. Reports for this and previous stages can be found at: [Water neutrality in Crawley | Crawley GOV](#).

- 2.53 The local authorities undertook a joint assessment of common policy options and issues as part of the sustainability appraisal process.
- 2.54 The issues of water efficiency and scale of development are interlinked because the more water efficient new developments are, the less offsetting that is required, meaning a higher scale of new development can be permitted. However, the potential for both water efficiency and offsetting are finite, thus constraining the amount of development possible in an area.
- 2.55 Parts A and B of the Water Neutrality Study had already concluded that water neutrality would be possible only through a combination of improved water efficiency measures in new development, offsets to reduce water use in existing locations elsewhere in the WRZ, and possible reduced housing numbers across the wider area. Water efficiency and offsets would work as shown in Figure 3.

Figure 3: Achieving Water Neutrality (Waterwise 2021)



- 2.56 The first requirement is to maximise the water efficiency of new development in order to reduce water consumption as far as possible. This is important as the greater the water efficiency (i.e. the less water used) in new development, the less offsetting that is needed overall to reach water neutrality. Tighter water efficiency in new development can be achieved through a combination of water efficient fittings (for example: low flow showers; tap aerators); flow regulators which reduce the flow of water into a property; and rainwater harvesting or greywater recycling.
- 2.57 The second requirement is to offset any remaining use, generally through retrofit measures elsewhere which reduce water consumption from existing development or agriculture within the Water Resource Zone.
- 2.58 Part C of the Water Neutrality Study took forward two of these targets to consider in more detail as part of the Strategy:
 - 110 l/p/d ('Building Regulations optional'): The current standard in the Local Plans of the affected local authorities. This has been found sound at examinations, reflecting the fact that the Sussex North WRZ is already in an area of serious water stress.
 - 85 l/p/d ('Realistically achievable'): The Part C report considered the justification of this more ambitious target, including its achievability, costs and impacts in relation to water

neutrality. Non-household development was considered alongside the residential element: it was recommended that it should achieve a score of three credits within the water (Wat 01 Water Consumption) issue category for the BREEAM New Construction Standard, achieving a 40% reduction compared to baseline standards.

- 2.59 The evidence set out in the Water Neutrality Study Part C indicates that a water efficiency policy target either of 85 l/p/d or 110 l/p/d would be reasonable to consider. It recommends that 85 l/p/d is adopted, because this is a figure supported as achievable by the Energy Savings Trust and Ofwat respectively (further details are found in Appendix C of the Part C Study). This more ambitious target would greatly reduce the need for offsetting measures to achieve water neutrality, and has been found to not unduly impact on viability (as shown in the Crawley Local Plan Viability Study Update, DixonSearle, January 2023). Its application to all developments (and not, for example, only to the large sites) is judged necessary due to the need for full water neutrality across all areas of the borough that fall within the Sussex North Water Resource Zone.
- 2.60 Appendix G: Policy SDC4 Table in the final SA/SEA Report (October 2024) shows the sustainability appraisal of the two reasonable alternatives for water neutrality, which relate to water efficiency. Each Local Authority within the Water Resource Zone committed to appraise these two options using their SA Framework and the methodology is consistent.
- 2.61 The preferred alternative, jointly agreed by all the authorities in the Sussex North WRZ, is a water efficiency level of 85 l/p/d for residential developments, or achieve a score of 3 credits within the water (WAT01 Water Consumption) issue category for the BREEAM Standard for non-residential developments.
- 2.62 Whilst both options would achieve water neutrality and help to protect the area's biodiversity and sites of international nature conservation importance, the preferred alternative is the more socially beneficial alternative, as it allows a greater number of homes to be built. It is economically viable for developers and future house buyers, and would require less expensive offsetting. It would have no significant negative impacts on the sustainability objectives.
- 2.63 The Statement of Common Ground confirms that these appraisal findings apply jointly to all the local authorities in the Sussex North WRZ, and all of the authorities agree that the preferred alternative is Option 2: 85 l/p/d for residential developments or achieve a score of 3 credits within the water (WAT01 Water Consumption) issue category for the BREEAM Standard for non-residential developments. This preferred option was taken forward in the Crawley Borough Local Plan, and has subsequently been adopted, as Policy SDC4: Water Neutrality.
- 2.64 The appraisal shows that there is a need for the process to be managed in order to ensure the certainty of achieving water neutrality is achieved. This will require the preparation of the Implementation Scheme alongside ongoing monitoring.

c) How the opinions expressed in response to public consultations¹⁹ have been taken into account

- 2.65 The SA/SEA was prepared by Crawley's Strategic Planning team who were also responsible for the development of the Local Plan. Internal and external stakeholders, including formal statutory consultees, were involved throughout the Sustainability Appraisal of the Local Plan.
- 2.66 Responses received from the formal stages of public consultations to the SA/SEA are set out in the appendices to the final SA/SEA Report (October 2024):
- Appendix B: responses received to the early engagement consultation on the scoping and draft SA/SEA report;

¹⁹ Regulation 13(2)(d) and 13(4)

- Appendix C: responses received as part of the initial Publication consultation stage on the draft SA/SEA;
- Appendix D: responses received to the second Publication consultation stage on the draft SA/SEA;
- Appendix E: responses received to the third Publication consultation stage on the draft SA/SEA; and
- Appendix F: responses received to the Main Modifications consultation stage on the draft SA/SEA.

2.67 These responses were each considered at the time of their submission as part of the iterative plan making process. The recommendations being made by the representations received were incorporated into the final SA/SEA document where these were considered appropriate.

July 2019 Early Engagement Consultation²⁰

2.68 From 15 July to 16 September 2019, the council published a draft consultation Local Plan for the purposes of early engagement that residents, businesses and other stakeholders were invited to comment upon, in accordance with Local Planning Regulations, Regulation 18²¹. This document set out the council's "preferred strategy" for the Local Plan Review, and contained initial draft reviewed, new and retained planning policies. This included issuing a draft Sustainability Report, which covered both the Sustainability Appraisal and the Strategic Environmental Assessment requirements and a Habitats Regulations Screening Report.

2.69 The responses to the consultation undertaken in 2019 were collated into the council's Consultation Statement document. This sets out a summary to the consultation and including an appendix with the comments received by consultees and stakeholders as part of this process. A summary of those comments received relating to the draft Sustainability Report can be found in Appendix B of the final SA/SEA report, October 2024.

2.70 The comments received at that point fed into the preparation of the Sustainability Appraisal report for the Submission Local Plan with changes made to objectives/appraisals as appropriate. CBC officer responses, confirming how the representations received were taken into account as part of the Local Plan and SA/SEA process, are set out in the Consultation Statement Appendix 2: Early Engagement Consultation Representations and Council Response, pages 586 to 599²².

January 2020 Initial Publication Consultation²³

2.71 Following a Full Council decision, in December 2019, to approve the draft Local Plan for Publication and Submission, an initial stage of formal public consultation took place, in accordance with Regulation 19²⁴, between January and March 2020. A draft SA/SEA was published for the same six-week consultation alongside the draft Local Plan.

2.72 Representations received in relation to the earlier draft SA/SEA during that period are set out in Appendix C of the final SA/SEA report, October 2024. These representations were submitted, in full, as part of the Local Plan submission to the Secretary of State. Officer responses to the representations received are set out in the council's Local Plan examination document: Crawley Borough Council's Officer Responses to the formal public consultation representation

²⁰ [Local Plan early engagement | Crawley GOV](#)

²¹ Regulation 18, Town and Country Planning (Local Planning) (England) Regulations 2012: <https://www.legislation.gov.uk/uksi/2012/767/contents/made>

²² [Appendix 2 Early engagement representations 0.pdf \(crawley.gov.uk\)](#)

²³ [Local Plan initial publication consultation 2020 | Crawley GOV](#)

²⁴ Regulation 19, Town and Country Planning (Local Planning) (England) Regulations 2012: <https://www.legislation.gov.uk/uksi/2012/767/contents/made>

summaries, September 2023²⁵, pages 32-33. Changes were made to the SA/SEA as appropriate, taking into account the responses made.

January 2021 Additional Publication Consultation²⁶

- 2.73 An updated draft SA/SEA Report was made available for consultation in tandem with the additional Regulation 19 consultation on the Local Plan Review which was carried out between January and June 2021. This followed a further Full Council decision which approved an updated draft Local Plan and supporting Key Documents for Publication and Submission in December 2019. The extended period of consultation allowed for full consultation to take place on the Local Plan as well as all the evidence completed to advise the Local Plan in its preparation.
- 2.74 Representations received in relation to the earlier draft SA/SEA during that period are set out in Appendix D of the final SA/SEA report, October 2024. These representations were submitted, in full, as part of the Local Plan submission to the Secretary of State. Officer responses to the representations received are set out in the Crawley Borough Council's Officer Responses to the formal public consultation representation summaries, September 2023, page 63. Changes were made to the SA/SEA as appropriate, taking into account the responses made.

May 2023 Further Publication Consultation²⁷

- 2.75 Progression of the Local Plan to Submission was subsequently delayed due to the work required in order to meet the Habitats Regulations specifically in relation to water supply constraints²⁸. Due to the unique and complex nature of the issue, the extent of this was previously unknown and could not have been predicted in advance. However, it was considered that there was then sufficient information available to address these concerns through the Local Plan Review.
- 2.76 The draft SA/SEA Report (May 2023) was available for consultation in tandem with the further Regulation 19 consultation on the Local Plan Review between May and June 2023. The changes to the draft Local Plan reflected the new requirements in relation to water neutrality, along with factual updates due to the Plan timetable delays, changes in national planning policy and additional evidence.
- 2.77 Representations received in relation to the draft submission SA/SEA during that period are set out in Appendix E of the final SA/SEA report, October 2024. Officer responses to the representations received are set out in the Crawley Borough Council's Officer Responses to the formal public consultation representation summaries, September 2023, pages 104-105. These representations were submitted, in full, alongside the May 2023 SA/SEA consultation document, as part of the Local Plan submission to the Secretary of State, to be considered by the Inspectors as part of their Examination into the Crawley Borough Local Plan.

February 2024 Main Modifications Consultation²⁹

- 2.78 Following the submission of the Local Plan in July 2023 to the Secretary of State, two Planning Inspectors were appointed to undertake its independent Examination. Two stages of Hearing Sessions were held, to allow the Inspectors the opportunity to investigate further into matters of the legal compliance and soundness of the Crawley Borough Submission Local Plan:

²⁵ [CBC.KD_CS_01k Crawley borough consultation statement – CBC's officer responses to the formal public consultation representation summaries, September 2023.pdf](#)

²⁶ [Local Plan publication additional consultation 2021 | Crawley GOV](#)

²⁷ [Local Plan publication further consultation 2023 | Crawley GOV](#)

²⁸ Water Neutrality in Crawley Webpage: [Water neutrality in Crawley | Crawley GOV](#)

²⁹ [Local Plan Main Modifications consultation 2024 | Crawley GOV](#)

- Part 1 Hearing Sessions: 21 – 23 November 2023
 - Part 2 Hearing Sessions: 9 – 11 January, and 16 January 2024
- 2.79 During the Examination process, a number of additional documents were provided to support the evidence and policies within the Local Plan.
- 2.80 On 30 January 2024, the Inspectors issued their post-hearing letter. This confirmed a series of Main Modifications they considered necessary to address soundness issues, particularly in relation to the Effectiveness of the Plan. These Main Modifications, along with additional modifications proposed by the council for factual and clarity purposes, were published for a formal six-week public consultation.
- 2.81 Where the modifications to the Local Plan resulted in amendments to the SA/SEA, these were carried out in the version of the SA/SEA published with the Main Modifications Consultation (February 2024).
- 2.82 Representations received to the SA/SEA at the Main Modifications consultation stage are set out in Appendix F of the final SA/SEA report, October 2024. These were submitted directly to the Inspectors carrying out the Examination into the Crawley Borough Local Plan, for their considerations. Their conclusions, on both the SA/SEA and HRA, were incorporated into their Final Report³⁰ (pages 12 to 15, paragraphs 32 to 43).

d) The reasons for choosing the plan as adopted, in light of the other reasonable alternatives dealt with

- 2.83 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.
- 2.84 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 eight 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.
- 2.85 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.
- 2.86 Fundamental to the urban form of the town is the principle of a town centre offering leisure and shopping opportunities, surrounded by a series of residential neighbourhoods, each with its own facilities and laid out preserving the best natural features of the countryside upon which the neighbourhoods were built. There are 13 neighbourhoods in the town, and development is ongoing on two more: Forge Wood, within Crawley’s administrative boundaries, to the north of Pound Hill neighbourhood, and Kilnwood Vale, in Horsham District, immediately adjacent to the west of Bewbush neighbourhood. Significantly, the level of residential development within Crawley town centre has recently been increasing at a fast pace. This is anticipated to result in a population living within the town centre equivalent to a further neighbourhood.
- 2.87 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;

³⁰ [Crawley Borough Local Plan Inspectors' final report September 2024.pdf](#)

500 new dwellings to the west of Copthorne; and almost 200 new dwellings along Rusper Road close to Ifield. A strategic office-led employment site has also been allocated as part of the adopted Reigate and Banstead Development Management Plan at Horley immediately adjacent to the borough boundary to the north of Gatwick Airport. Further major development is being promoted to the west and east of Crawley in Horsham and Mid Sussex districts.

- 2.88 The Crawley Borough Local Plan addresses development proposals including the long-term housing and employment need and land supply position for the period up to 2040. It includes policies to guide the location and type of new development, meeting as much of Crawley's development needs as possible whilst protecting valued elements of the natural and built environment; and sets out plans for the implementation of infrastructure supporting it.
- 2.89 The Local Plan has been prepared using the evidence base and having regard to consultation feedback. The early engagement consultation and preparation of draft policies and options for the Local Plan identified initial objectives for the planning and delivery of development in Crawley. These objectives were considered during the Sustainability Appraisal and fed into the draft Local Plan. They evolved alongside the Local Plan, with the preparation of the SA/SEA and the assessments forming an iterative process interlinked with the changes as part of the Local Plan Review. Figure 1 (page 5 of this document) shows how the SA and HRA timetables align with the Local Plan production.
- 2.90 The final version of the SA/SEA was considered alongside, and to support, the adoption of the Local Plan.

e) The measures that are to be taken to monitor the significant environmental effects of the implementation of the Local Plan

- 2.91 The final SA/SEA Report (October 2024) sets out the monitoring indicators identified to monitor the effects of the Plan against the Sustainability Objectives.
- 2.92 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. Since its adoption, the Crawley Borough Local Plan (2015) has been regularly monitored against the policy and SA indicators. The outcomes of this monitoring have been published in the Authority's Monitoring Reports³¹ (AMR).
- 2.93 As part of the review of the Local Plan, for each of the newly identified Sustainability Objectives for Crawley (see Section a, paragraph 2.9 and Table 2 above) associated indicators were identified to monitor the effects of the Plan against the Objectives. These are shown Table 5.
- 2.94 These monitoring indicators were based on a review of the previous Monitoring Indicators, the Baseline Data and a critical assessment of ensuring these formed SMART indicators (Specific, Measurable, Achievable, Relevant, Time-Bound).

³¹ [Crawley Borough Local Plan Authority Monitoring Report 2022 to 2023.pdf](#)
[Crawley Borough Local Plan Authority Monitoring Report 2021/22](#)
[Crawley Borough Local Plan Authority Monitoring Report 2020/21](#)
[Crawley Borough Local Plan Authority Monitoring Report 2019/20](#)
[Crawley Borough Local Plan Authority's Monitoring Report 2018/19](#)
[Crawley Borough Local Plan Authority's Monitoring Report 2017/18](#)
[Crawley Borough Local Plan Authority's Monitoring Report 2016/17](#)
[Crawley Borough Local Plan Authority's Monitoring Report 2015/16](#)

Table 5: Sustainability Objectives and Monitoring Indicators

Objectives	Examples of Indicators
<p>1. To mitigate climate change, by taking actions to reduce the concentration of greenhouse gases in the atmosphere.</p>	<ul style="list-style-type: none"> • CO₂ reduction from Local Authority activities; • Per capita greenhouse gas and total emissions in the local authority area, including the breakdown for domestic buildings; industry; transport; and land use, land-use change, and forestry; • Quantity of Residual household waste collected per household; • Proportion of household waste recycled or composted; • Amount of new development which achieves moderate and high density levels meeting the requirements of Compact development, providing the potential to create efficiencies in the use of other resources, including energy supply, services and transportation.
<p>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.</p>	<ul style="list-style-type: none"> • Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds; • Per capita water consumption; • Number of planning permissions where Thames Water request a drainage planning condition; • Trends in annual mean NO₂; • Trends in annual mean PM₁₀ concentrations; • Proportion of new dwellings with single aspect windows facing within 45 degrees of east, west and south • Number and Type of new noise sensitive uses in areas currently and potentially affected by unacceptable noise.
<p>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.</p>	<ul style="list-style-type: none"> • Number of Listed Buildings on the Buildings at Risk Register; • The percentage of Conservation Areas with up-to-date Appraisals (i.e. last five years); • Proportion of the borough covered by up-to-date Area-Wide Character and Design Assessments.
<p>4. To ensure that everyone has the opportunity to live in a decent and affordable home.</p>	<ul style="list-style-type: none"> • Plan period and housing delivery targets; • Net additional dwellings – in previous years; • Net additional pitches (Gypsy and Traveller); • Gross affordable housing completions; • Mix of affordable housing delivered compared to indicative housing provision by no. of bedrooms identified in the most recent SHMA; • Mix of market housing delivered compared to indicative housing provision by no. of bedrooms identified in the most recent SHMA; • Estimated number of households in housing need; • Median workplace-based affordability ratio; • Supply of ready to develop housing sites (five-year housing land supply); • New and converted dwellings on previously developed land; • Average density of new residential development.
<p>5. To maintain, support and promote a diverse employment base that can serve the local and sub-regional and regional economy.</p>	<ul style="list-style-type: none"> • Amount of new business land and floorspace delivered; • Percentage of people aged 16 – 74 with no (or other) qualifications;

Objectives	Examples of Indicators
	<ul style="list-style-type: none"> • Working age population qualified to at least NVQ Level 4 or Higher; • Completed loss of employment floorspace to residential use via planning permissions in main employment areas; • Number of residential dwellings built in the Town Centre; • Vacancy rate for ground floor commercial units in Primary Shopping Area; • Completed Town Centre Neighbourhood Facilities by sqm. floorspace.
<p>6. To conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough and minimise harm to those outside Crawley’s administrative boundaries from activity within the borough.</p>	<ul style="list-style-type: none"> • Amount and type of development within areas designated for their nature importance; • Amount of trees with Tree Preservation Orders lost per annum; • Amount and type of open space, sport and recreational spaces lost/gained per annum; • Number of trees and soft landscaping secured on site or through S106 contributions; • Hectares/percentage of land in Crawley identified as Local Wildlife Sites; • Hectares/percentage of land in Crawley identified as Ancient Woodland; • Number of goals within a Management Plan met in a specified time period (five years); • Number of Management Plans renewed in a five year cycle; • Change in areas of biodiversity importance; • Improved Local Biodiversity – proportion of Local Sites where positive conservation has been or is being implemented; • Percentage of Biodiversity Net Gain secured from new developments; • Net change in water demand within the part of Crawley which falls within the Sussex North Water Resource Zone.
<p>7. To reduce car journeys and promote sustainable and alternative methods of transport, whilst ensuring sufficient transport infrastructure is delivered to meet the requirements of the borough.</p>	<ul style="list-style-type: none"> • Access to services and facilities by public transport, walking and cycling: The proportion of housing delivered on major and significant scale developments which achieves the appropriate minimum densities; • Proportion of significant scale developments which are high or moderate density and provide appropriate public transport accessibility; • Children travelling to school – mode of transport usually used; • Proportion of adults who do any walking or cycling, for any purpose; • Proportion of new development with appropriate layout of pathways to encourage walking and cycling; • Change in number of publicly available Electric Vehicle Charging Points within the borough; • Number of passengers and staff using Gatwick Airport per annum and percentage arriving by public transport; • Per capita and CO₂ emissions from transport (also see Objective 1).
<p>8. To ensure the provision of sufficient infrastructure to meet the requirements of the borough.</p>	<ul style="list-style-type: none"> • Rate of residential and commercial development to be in accordance with Local Plan annualised requirements and local commercial requirements;

Objectives	Examples of Indicators
	<ul style="list-style-type: none"> • Progress in delivery of critical infrastructure projects identified in Infrastructure Plan: Appendix 2 (Infrastructure Delivery Schedule), December 2023 – or future updates – alongside housing and employment development, in accordance with the Phasing Chart in the Schedule; • Quantity or extent of development where a contribution is required to fund or part-fund the delivery/improvement or expansion of sustainable transport infrastructure, and particularly in relation to significant developments.
<p>9. To promote healthy, active, cohesive and socially sustainable communities. To ensure all benefit from a good quality of life. To ensure everyone has the opportunity to participate in sport and to encourage active lifestyles.</p>	<ul style="list-style-type: none"> • Self-reported measure of people’s overall health and wellbeing; • Participation of 17 year olds in education or training; • Percentage of people aged 16 – 64 with no qualifications; • GP/CCG/WSCC Public Health data; • Total Recorded Crime; • Rate of public place violence offences; • All-age all-cause mortality rate; • Healthy life expectancy at age 65 years; • Proportion of physically active adults age 19 and above; • Percentage of Year 6 children identified to be obese. • Completed Town Centre Neighbourhood Facilities by sqm. floorspace. • Proportion of physically active adults age 19 and above; • Participation rate in arts and culture.

- 2.95 The Local Plan is accompanied by the Crawley Borough Local Plan Monitoring and Implementation Framework³², which sets out in detail how the objectives and policies of the Local Plan will be monitored and the actions that will be taken if monitoring indicates that they are not being implemented. This document commits the council to continue to publish its AMRs on an at least annual basis, although updates will not be restricted where further information is available sooner. The results will feed into subsequent reviews of the Local Plan and other immediate actions taken, including liaison with partners such as landowners, developers, infrastructure providers, funding bodies and local employment, environmental and social groups.
- 2.96 The AMR will also cover monitoring of the Sustainability Appraisal objectives in order to measure any significant social, economic and environmental effects after Local Plan adoption. This will allow the identification of any unforeseen adverse effects and enable appropriate remedial action to be taken.
- 2.97 In addition, the Environment Act 2021 introduced a biodiversity duty on public authorities. This requires CBC to first report how it is meeting the duty no later than 1 January 2026 and to reconsider the actions it can take within five years of when it completes its previous consideration. The council can decide to do this more often. CBC proposes to monitor the progress it makes against meeting its Biodiversity Duty annually through the AMR, with a full detailed review at five years. As part of this reporting, the council must include information on biodiversity net gain as part of its Biodiversity Duty Report.

³² [Monitoring and implementation \(crawley.gov.uk\)](https://www.crawley.gov.uk/monitoring-and-implementation)

3.0 Further Documents

3.1 The following documents referred to in this statement can be accessed on the council's planning policy website: [Planning policy | Crawley GOV](#) and [Local Plan | Crawley GOV](#):

- Crawley Borough Local Plan 2023 to 2040 (October 2024): [Crawley Borough Local Plan 2023 to 2040.pdf](#)
- Inspectors' Final Report into the Examination of the Crawley Borough Local Plan (September 2024): [Crawley Borough Local Plan Inspectors' final report September 2024.pdf](#)
- Sustainability Appraisal/Strategic Environmental Assessment: Sustainability Report for the Local Plan (September 2024): [Sustainability report October 2024.pdf \(crawley.gov.uk\)](#)
- Sustainability Appraisal/Strategic Environmental Assessment: Sustainability Report for the Local Plan Main Modifications Consultation (February 2024): [Sustainability appraisal - Strategic Environmental Assessment Modifications Consultation report February 2024.pdf \(crawley.gov.uk\)](#)
- Sustainability Appraisal/Strategic Environmental Assessment: Sustainability Report for the Local Plan Further Publication Consultation (May 2023): [3. Sustainability Appraisal SA,SEA Report May 2023.pdf \(crawley.gov.uk\)](#)
- Sustainability Appraisal/Strategic Environmental Assessment: Sustainability Report for the Local Plan Additional Publication Consultation (January 2021): [Draft Sustainability Appraisal January 2021.pdf \(crawley.gov.uk\)](#)
- Sustainability Appraisal/Strategic Environmental Assessment: Sustainability Report for the Local Plan Initial Publication Consultation (January 2020): [PUB354561.pdf \(crawley.gov.uk\)](#)
- Sustainability Appraisal/Strategic Environmental Assessment: Sustainability Report for the Local Plan Scoping and Draft Report (July 2019): [PUB353178.pdf \(crawley.gov.uk\)](#)
- Crawley Local Plan Statement of Consultation and Appendices 1 to 10:
[Consultation statement July 2023.pdf \(crawley.gov.uk\)](#)
[Crawley borough consultation statement – CBC's officer responses to the formal public consultation representation summaries, September 2023.pdf](#)
[Appendix 1 Early engagement consultation materials.pdf \(crawley.gov.uk\)](#)
[Appendix 2 Early engagement representations_0.pdf \(crawley.gov.uk\)](#)
[Appendix 3 Initial publication materials.pdf \(crawley.gov.uk\)](#)
[Appendix 4 Initial publication representations.pdf \(crawley.gov.uk\)](#)
[Appendix 4b Wilky Group appendices combined.pdf \(crawley.gov.uk\)](#)
[Consultation statement appendix 5 - Additional consultation materials.pdf \(crawley.gov.uk\)](#)
[Consultation statement appendix 6 - additional consultation representations.pdf \(crawley.gov.uk\)](#)
[Consultation statement appendix 7 - further publication consultation materials.pdf \(crawley.gov.uk\)](#)
[Consultation statement appendix 8 - further publication consultation representations.pdf \(crawley.gov.uk\)](#)
[Consultation Statement Appendix 9 Main Modifications Consultation Materials February 2024.pdf \(crawley.gov.uk\)](#)

[Crawley Local Plan Consultation Statement Appendix 10 Main Modifications Representations.pdf](#)

- Habitats Regulations Assessment Integrity Test (October 2024): [Habitats regulations assessment integrity test October 2024.pdf \(crawley.gov.uk\)](#)
- Habitats Regulations Assessment for the Crawley Borough Local Plan Main Modifications (February 2024): [Crawley Borough Local Plan Main Modifications Habitats Regulations assessment report February 2024.pdf](#)
- Habitats Regulations Assessment for the Crawley Borough Local Plan (January 2023): [Introduction \(crawley.gov.uk\)](#)
- Draft Habitats Regulations Assessment for the Crawley Borough Local Plan (January 2021): [Draft Habitats Regulations Assessment of Crawley Local Plan January 2021.pdf](#)
- Habitats Regulations Assessment Screening Report (July 2019 and January 2020): [PUB353179.pdf \(crawley.gov.uk\)](#) and [Habitats Regulations Assessment of Crawley Local Plan January 2020.pdf](#)
- Monitoring and Implementation Framework (October 2024): [Monitoring and implementation \(crawley.gov.uk\)](#)
- Monitoring and Implementation Framework Main Modifications (February 2024): [Monitoring and implementation \(crawley.gov.uk\)](#)
- Monitoring and Implementation Framework (May 2023): [Monitoring and implementation \(crawley.gov.uk\)](#)
- Sustainability Appraisal/Strategic Environmental Assessment: Sustainability Report for the Local Plan (December 2015): [SA/SEA Scoping Report December 2015 \(crawley.gov.uk\)](#)

GLOSSARY

Affordable Housing

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

Authority's Monitoring Report (AMR)

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

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.

Local Development Scheme (LDS)

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

Local Plan

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

National Landscape

A national landscape designation which aims to conserve and enhance the natural beauty of the landscape. Previously known as Area of Outstanding Natural Beauty (AONB).

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 and 2019, with the version published before the Local Plan Submission in 2021. This is the version the Local Plan Review is considered to be in conformity with. Subsequent revisions have been published since the submission of the Local Plan for its examination, in September and December 2023.

Planning and Compulsory Purchase Act 2004 (updated in 2008)

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

Planning Practice Guidance

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

Previously Developed Land (PDL)

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

Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA)

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

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.

Water Neutrality

Development within a given area is 'water neutral' where it results in no net increase in water use within the region in question. For the purposes of the Local Plan water neutrality is applied at the level of the Sussex North Water Resource Zone (WRZ), meaning that for every new development, total water use in the WRZ after the development must be equal to or less than the total water-use in the region before the new development.