

**STATEMENT BY  
HORSHAM DISTRICT AND  
CRAWLEY BOROUGH COUNCILS**

**ISSUE 2**

**ADS 3: Major Acute Hospital**

**ADS 4: Renewable Combined Heat and Power (CHP) Scheme, non-household waste mechanical treatment (MT) plant and Western Relief Road**

**ADS 5: Ifield Golf Course**

**ADS 7: Ifield Golf Course and surrounding land**

**ADS 9: Land adjoining Bonnetts Lane, Ifield**

**ADS 8a: Land West of Ifield**

**ADS 8b: Ifield Golf Course**

**HORSHAM DISTRICT AND CRAWLEY BOROUGH LOCAL  
DEVELOPMENT FRAMEWORKS**

**WEST OF BEWBUSH JOINT AREA ACTION PLAN DEVELOPMENT  
PLAN DOCUMENT**

**JANUARY 2009**



**Horsham  
District  
Council**



## ISSUE 2: Alternative Development Options

### 1. Introduction

- 1.1 This Statement relates to Issue 2 and the alternative development sites and boundary changes that were put forward to the Councils and subsequently consulted on in the Alternative Development Sites and Boundary Changes (ADS) document.
- 1.2 A number of issues relating to the proposed alternative development sites and boundary changes and the ensuing consultation responses. Subsequently, the Inspector has identified main matters and questions for Examination.

### 2. Main Matters

- 2.1 There are several main matters and questions raised in the Inspector's Issues for Examination. Fundamentally, the Inspector asks '**Whether the proposed alternatives would meet the principles and objectives set out in the Core Strategies better than the proposed site**'. This section sets out the relevant questions and the Councils' responses.

#### Questions for most Alternative Development Sites [ADS]

How is the Sustainability Appraisal assessment incorrect for the ADS (where applicable)?

- 2.2 During the preparation of the JAAP, a number of sites were submitted as possible alternatives to the West of Bewbush site proposed by the Councils. These sites have either been partially assessed or not subject to an SA/SEA. The reasons as to why the Councils have not assessed these sites, and do not consider that this has resulted in any shortcoming of the Sustainability Appraisal are set out in statement HDBC/Issue 8. For example the sites are not considered to be reasonable alternatives as they do not meet the requirements of the Councils Core Strategies or are limited by environmental or landscape constraints.

For residential alternatives, how would the ADS better meet the principles and objectives set out in the Core Strategies?

- 2.3 The Councils are firmly of the view that the ADS would not meet the principles and objectives set out in the Core Strategies in a better way than the West of Bewbush.

#### ADS 1

The westernmost part lies outside the Area of Study in the Core Strategies (CP 6 & W1). Can this part therefore be considered? Would the remainder achieve the required housing numbers?

- 2.4 The part that lies outside the Area of Study identified in the Core Strategies (CP6 and W1) cannot be considered as part of the JAAP process which has been prepared in compliance with the overarching Core Strategies.
- 2.5 The Councils consider that the land that remains within the JAAP boundary and Area of Study, south of the railway line, would not have the capacity to accommodate a neighbourhood of 2,500 homes and other uses as required by the policies of the JAAP and illustrated on the Conceptual Masterplan. The JAAP has to be consistent with other DPD (in this case two adopted Core Strategies), as per test of soundness 6, and the JAAP would be unsound if the boundary were amended to that included in ADS 1.
- 2.6 The Councils do not consider that there is an impediment to the crossing of the railway for the reasons discussed in statements HDBC/Issue 1 and HDBC/Issue 6 and there is therefore no justification in limiting development to the south of the railway line.

## **ADS 2**

Would the deletion of this part of the site prevent the housing numbers being achieved?

- 2.7 This site has been withdrawn. Furthermore recent surveys by a landscape historian and archaeologist have confirmed to the satisfaction of the County Archaeologist that there is no evidence of a designed parkland landscape and that this entry on the HER does not present a constraint to development.
- 2.8 The Councils consider that this site is needed to bring forward a neighbourhood of 2,500 homes and other uses as required by the policies of the JAAP and illustrated on the Conceptual Masterplan. It is anticipated that the deletion of this part of the site would prevent the housing numbers being achieved.

## **ADS 3**

A major acute hospital is not identified in the Core Strategies for the JAAP to allocate. Can this therefore be considered?

- 2.9 It is the Councils firm view that ADS 3 can not be considered as part of the JAAP. The Councils' adopted Core Strategies identified an area of study for accommodating the West of Crawley allocation, which is identified in the West Sussex Structure Plan Policy LOC1 (CDSx1). Critically, the West Sussex Structure Plan paragraph 82 primarily tasks the Councils with accommodating 2500 homes West of Crawley. No reference is made to the provision of a major acute hospital and accordingly the Councils' adopted Core Strategies set the policy context for accommodating 2,500 homes and other uses through a JAAP, which would establish the most appropriate location for accommodating the development in the Area of Study, in accordance with the neighbourhood principle. Again, the adopted Core Strategies make no reference to the requirement to accommodate a major acute hospital in the

Area of Study. Therefore, with the JAAP having to be consistent with other DPD (in this case two adopted Core Strategies), as per test of soundness 6, it would have been unsound for the Councils to have pursued such a proposal. The Councils in setting the criteria and policy context to the JAAP in their Core Strategies is what was intended by PPS12 paragraph 2.18 (CDNat6a), which states a Core Strategy may set the criteria for identifying locations and priorities for the preparation of an area action plan.

- 2.10 Furthermore, the Councils received a representation from the Surrey and Sussex Healthcare NHS Trust during the preparation of the Submission JAAP confirming the Trusts position that in it considers there to be “no case for additional acute hospital services in this area.” The Trusts letter of representation is appended to this statement for clarification.

#### **ADS 4**

This site lies outside the Area of Study in the Core Strategies (CP 6 & W1), and a CHP scheme is not identified in the Core Strategies to allocate. Can this therefore be considered?
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- 2.11 It is the Councils firm view that ADS4 can not be considered as part of the JAAP Examination. The Councils’ adopted Core Strategies identified an area of study for accommodating the West of Crawley allocation, which is identified in the West Sussex Structure Plan Policy LOC1 (CDSx1). Critically, the West Sussex Structure Plan paragraph 82 (CDSx1) primarily tasks the Councils with accommodating 2500 homes West of Crawley. It is important to note that no reference is made to CHP, or built waste management facilities, particularly of the scale proposed through ADS4. Accordingly, the Councils’ adopted Core Strategies set the policy context for accommodating this scale and form of development through a JAAP, which would establish the most appropriate location for accommodating the development in the Area of Study, in accordance with the neighbourhood principle. Again, the adopted Core Strategies make no reference to the requirement to accommodate CHP, or built waste management facilities in the Area of Study. Therefore, with the JAAP having to be consistent with other DPD (in this case two adopted Core Strategies), as per test of soundness 6, it would have been unsound for the Councils to have pursued such a proposal. The Councils setting the criteria and policy context to the JAAP in their Core Strategies is what was intended by PPS12 paragraph 2.18 (CDNat6a), which states a Core Strategy may set the criteria for identifying locations and priorities for the preparation of an area action plan.

- 2.12 Furthermore, in terms of test of soundness 6, the Core Strategies defined the Area of Study for the JAAP. Therefore, the JAAP through its formulation only considered the Area of Study. Consequently, to have considered proposals outside of the JAAP allocation, or the Area of Study would not have been consistent with the adopted Core Strategies and be unsound. On this basis alone, the Councils do not believe ADS4 can be considered as part of the JAAP Examination.

- 2.13 Finally, the Councils are also firmly of the view (at the time of statement submission) that the SA/SEA material presented to support the consideration of ADS4 is inadequate and does not accord with the requirements and legislation set out in the Council's statement 8 paragraph 2.2. It is a clear requirement of PPS12 paragraph 4.17 (CDNat6a) that this SA/SEA process is adhered to. Therefore, if it is considered that the SA/SEA requirements and process as not be met, once again, the ADS can not be considered as part of the JAAP Examination.

### **ADS 5, 6 & 8B**

Are these sites too small to achieve the required housing numbers?

- 2.14 ADS 8B has been withdrawn. Nevertheless, this Alternative Development Site together with ADS 5 and 6 are not considered to be reasonable alternatives to the West of Bewbush as they are not large enough to deliver 2,500 homes and other uses on a neighbourhood principle as required by the Horsham District and Crawley Core Strategies. The Councils' reasoning is set out further in statement HDBC/Issue 8.

### **ADS 6, 7 and 8A**

Do landscape, ecological, flood, noise and conservation constraints preclude these sites? An eastern part of ADS 8A lies outside the Area of Study in the Core Strategies (CP 6 & W1) – can this area therefore be considered?

- 2.15 The SA/SEA excluded some of the land in ADS 7 and 8A because it was unsuitable for development in environmental and landscape terms. The areas that remain available for assessment are not considered to be reasonable alternatives to the West of Bewbush as they are not large enough to deliver 2,500 homes and other uses on a neighbourhood principle as required by the Horsham District and Crawley Core Strategies. The Councils' reasoning is set out further in statement HDBC/Issue 8.
- 2.16 ADS 8A has been withdrawn. The part that lies outside the Area of Study identified in the Core Strategies (CP6 and W1) cannot be considered as part of the JAAP process which has been prepared in compliance with the overarching Core Strategies.

## **3. Responses to the matters raised by original representations**

- 3.1 The Councils do not wish to respond to specific representations relating to Issue 2.

## **4 Proposed changes to the JAAP**

- 4.1 The Councils do not wish to propose wording changes to the JAAP for consideration by the Inspector.

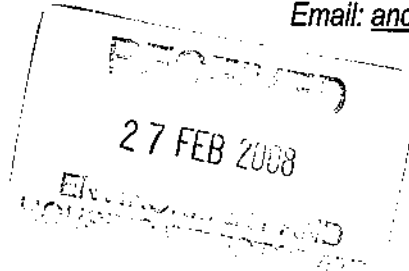
## **5 Conclusion**

5.1 It is considered that the responses to the Inspector's questions, demonstrate that the proposed alternatives would not meet the principles and objectives set out in the Core Strategies better than the proposed site and that the JAAP meets the relevant Tests of Soundness, particularly Tests 4,6,7 and 9.

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25 February 2008



Dear Steve

### **West and north west of Crawley strategic development**

Further to our conversation last week, I am writing to confirm the position of Surrey & Sussex Healthcare NHS Trust in relation to the proposed new residential neighbourhood to the west and north west of Crawley.

It would be outside the remit of the Trust to comment on the most suitable location for additional housing. However, we are pleased to have the opportunity of commenting in relation to the provision of health services in this area.

The 'Fit for the Future' reviews undertaken recently by both Surrey and West Sussex Primary Care Trusts have recognised East Surrey Hospital as a fixed point in the provision of acute hospital services. We have been designated by Surrey PCT as one of two cardiology centres in Surrey. All of the 'Fit for the Future' options currently under consideration by West Sussex PCT involve the flow of additional patients to the Trust from Princess Royal Hospital. We will also need to respond to additional demand resulting from any future changes at Epsom & St Helier University Hospitals NHS Trust. The Trust's vision is to become a Foundation Trust by April 2010 with an established reputation for clinical excellence.

The Trust continues to provide a range of services on the Crawley Hospital site, which is managed by West Sussex PCT. We are fully committed to maintaining services in Crawley. The Trust would therefore support any future plans by the PCT to reprovide these services in a more suitable facility, either on the existing site or elsewhere.

As you may be aware, West Sussex PCT has commissioned a review of health services in north-east West Sussex. This will be led by Sir Graeme Catto, who has been chairing the Fit for the Future Options Assessment Panel. The review will commence in April and is expected to report in December 2008. The Trust will cooperate fully with this review to improve the health of the population we serve.

I understand that plans for the residential development include a possible medical facility. Clearly a development of this size would require additional primary care

provision. In the Trust's view there would be no case for additional acute hospital services in this area.

I hope that these comments are helpful, and I would be pleased to answer any further queries you may have.

Yours sincerely



Andrew Hines  
Director of Business Development

cc: Sara Weech, West Sussex PCT