

## **Alternative Sites and Sustainability Appraisals Response to Inspector's request 10 September**

The Joint Area Action Plan, in identifying land to the West of Crawley must be in conformity with Policy CP6 of the Horsham District Core Strategy and Policy W1 of the Crawley Borough Council Core Strategy. Following the collection of evidence for West of Crawley area, the wording of the two policies precludes some areas of land for consideration for development purposes. These areas were therefore not considered as part of the SA/SEA carried out by the two Councils. Appendix 11 of the Sustainability Appraisal of Regional Spatial Strategies and Local development Documents (p 126) supports this view stating "some options may not be practical or within a LPAs powers, while others may not be appropriate to a particular stage or level of plan"....."decisions made at the 'higher' level will close off some options" In this instance policies CP6 and W1 are the higher level, and both policies have in any case been subject to a separate sustainability appraisal process.

In terms of the process of the selection of potential areas where development could be located West of Crawley (and thus the identification of reasonable alternatives for development in the SA/SEA) Core Strategy Policies CP6 and W1 are of key importance and state the following:

- Land to be allocated for housing should be located within the area of search identified on the Councils' key diagrams / proposals maps.
- The allocation is for 2,500 homes to be built according to the neighbourhood principle which will include a mix of uses such as shops, employment areas, a primary school, GPs surgery and so on. The area of development therefore needs to be of such a size that it is capable of supporting a neighbourhood level of development.
- Development should be located and designed to maintain the separation between Horsham Crawley, particularly the strategic gap.
- Development should protect and enhance the setting of Ifield conservation area, avoid areas of flood risk and aircraft noise contours of 60dBA or above (either as existing or as indicated in relation to the alignment of a potential second runway at Gatwick and 'safeguarded' area).

The requirements above, together with environmental information such as the location of sensitive landscapes and habitats resulted in the identification of just two areas that are in the Councils' opinion capable of accommodating the level of development required. These are the land to the west of Bewbush (as per the area identified in the Conceptual Masterplan) and West of Ifield which includes Ifield Golf course, and the land north of this (but not westward) as far as the floodplain. The area of land extends eastward with the floodplain as the northern boundary and the area of search the easternmost extent. (A map of this area can be provided if the Inspector would feel that this would be beneficial).

Finally, when considering whether additional land submitted to the two Councils should be subject to a sustainability appraisal paragraph 5.3.7 of the Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents has been taken into account. It states "given the frontloading inherent in the system, new sites should not be raised for consideration at submission or examination. However, in exceptional circumstances where a site is identified at a late stage in the DPD preparation process the promoter of the new site will need collate the relevant SA information in sufficient time to allow consultation with the public on the proposal and appraisal well in advance of the submission or examination"

Taking into account the above, the Councils' view as to whether the ADS sites have been subjected to a sustainability appraisal / whether further work is required is set out in the table below:

Site	Current Level of Assessment	Appraisal of whether further work is required
ADS1: West of Bewbush Alternative Boundary 1	Easternmost section of site assessed as part of SA/SEA of the JAAP.	Westernmost extent of site extends beyond area of search and into Strategic Gap, thus conflicting with CP6/W1. No further assessment needed by HDC/CBC but developer may feel they wish to undertake further work if they consider that this evidence would assist them at the examination hearings.
ADS2: West of Bewbush Alternative Boundary 2	All of site assessed as part of SA/SEA of the JAAP	Proposal is for a deletion of part of the area allocated by the Councils. The sensitivity of the land deleted is addressed in the SA/SEA with mitigation measures proposed. Site not previously put to the Councils prior to submission and further SA/SEA work is the responsibility of the objector.
ADS4: Renewable CHP scheme	Not assessed by HDC/CBC	CP6/W1 state that development is for housing and neighbourhood level ancillary uses. This does not include a proposal of this scale (irrespective of the energy source). Furthermore, land is outside the area of search. In addition, no map proposing the land for the scheme was provided to the Councils prior to submission. It is therefore not considered that the Councils need to carry out any further SA work on this site, and any further SA/SEA work would be the responsibility of the objector.
ADS5: Ifield Golf Course	Assessed as part of the wider 'west of Ifield' potential development area	Site was not assessed as a 'discrete' land area, as the land is not of a sufficient size to accommodate a neighbourhood of 2,500 homes as required by CP6/W1. No further assessment needed by HDC/CBC, but developer may feel they wish to undertake further work if they consider that this evidence would assist them at the examination hearings.
ADS6: Ifield Golf Course	Assessed as part of the wider 'west of Ifield' potential development area	Site was not assessed as a 'discrete' land area, as the land is not of a sufficient size to accommodate a neighbourhood of 2,500 homes as required by CP6/W1. No further assessment needed by HDC/CBC but developer may feel they wish to undertake further work if they consider that this evidence would assist them at the examination hearings.

Site	Current Level of Assessment	Appraisal of whether further work is required
ADS7: Ifield Golf Course and Surrounding Land	Golf course and land immediately to the north as far as flood plain considered as part of Councils' assessment of the land west of Ifield.	Land west of the golf course and south (west of Ifield west) excluded from Councils' consideration of sites due to sensitivity of landscape / flood plain constraints. It is not considered that further assessment work is required by the two Councils, but the developer may feel they wish to undertake further work if they consider that this evidence would assist them at the examination hearings.
ADS8A: Land West of Ifield	Land partially assessed by HDC/CBC. Land appraised includes land north of Rusper Road as far as the flood plain and eastward to the edge of the area of search.	Land to the north of the floodplain was not assessed as a consequence of aircraft noise constraints. Land east of the area of search not included as it would conflict with CP6/W1. Much of the land is also within a Ifield Brook flood plain in any case. It is not considered that further assessment work is required by the two Councils, but the developer may feel they wish to undertake further work if they consider that this evidence would assist them at the examination hearings.
ADS8B: Ifield Golf Course	Assessed as part of the wider 'west of Ifield' potential development area	Site was not assessed as a 'discrete' land area, as the land is not of a sufficient size to accommodate a neighbourhood of 2,500 homes as required by CP6/W1. No further assessment needed by HDC/ CBC but developer may feel they wish to undertake further work if they consider that this evidence would assist them at the examination hearings.
ADS9: Land Adjoining Bonnetts Lane, Ifield	Not assessed by HDC/CBC	Site is of insufficient size to accommodate 2,500 homes and is subject to aircraft noise constraints. No further assessment required by HDC/CBC but developer may feel they wish to undertake further work if they consider that this evidence would assist them at the examination hearings.