

WEST OF BEWBUSH
JOINT AREA ACTION PLAN
EXAMINATION IN PUBLIC

FINAL
3,000 Words

EXAMINATION STATEMENT
CREST NICHOLSON DEVELOPMENTS LTD
DECEMBER 2008

**Issue 4 - Chapter 4: Policies WB 13 – 22: Biodiversity; Archaeology;
Green Linkages; Flood Risk/Management; Policy WB 18 - Household
Waste Recycling Facilities; Recreation and Open Space; Education;
Employment; Sustainability/Sustainable Construction**
Tuesday 27th January 2009

CND EXAMINATION STATEMENT 4
CND REF: 73910

Issue 4 - Chapter 4: Policies WB 13 – 22: Biodiversity; Archaeology; Green Linkages; Flood Risk/Management; Policy WB 18 - Household Waste Recycling Facilities; Recreation and Open Space; Education; Employment; Sustainability/Sustainable Construction

Tuesday 27th January 2009

Introduction

This Examination Statement has been submitted by Crest Nicholson Developments (CND) as part of the Examination in Public on the West of Bewbush Joint Area Action Plan (JAAP). The Statement highlights and where necessary expands upon representations submitted by CND in July and October 2008 on the JAAP process. It does not repeat representations.

The following CND representations and technical evidence are relevant to this statement:

Ref		Ref	
WBSUB224	Landscape (Objection) Withdrawn	WBSUB229	Archaeology (Objection) Withdrawn
WBSUB225	Landscape (Objection) Withdrawn	WBSUB230 Policy WB14	Archaeology (Objection) Withdrawn
WBSUB226 Policy WB12	Landscape (Objection) Withdrawn	WBSUB232	Noise (Support)
WBSUB227	Biodiversity (Objection) Withdrawn	WBSUB233	Flood Risk (Support)
WBSUB228 Policy WB13	Biodiversity (Support)	WBSUB235	Household Waste Recycling Facilities (Support)
WBSUB234	Waste Recycling Facility (Object) Withdrawn	WBSUB236 Policy WB19	Open Space (Objection)
WBSUB261	Conceptual Masterplan (Objection) Withdrawn	WBSUB238 Policy WB20	Education (Objection)
WBSUB237	Education/Population Assumption (Support)	WBSUB239 Policy WB21	Employment (Support)
WBSUB213 Policy WB5	Community Centre (Objection)	WBSUB214 Policy WB6	Healthcare (Objection)

Statement 4 Appendices:

Appendix: Covering Letter explanation of amendments to the Critique of URS Neighbourhood Study

Appendix: Amended CND Technical Appendix 6, Critique of URS Neighbourhood Study

Appendix: Amended representations WBSUB213, WBSUB214, WBSUB236, WBSUB238

Appendix: Briefing Note on Population Assumptions (EFM Ltd)

Appendix: WB22 Sustainability Policy Response table

Abbreviations

- CBC / HDC – Crawley Borough Council / Horsham District Council
- CND – Crest Nicholson Developments Ltd
- SV – Savills (Planning Consultant)
- BW – Barton Willmore (Masterplanner)
- SLR (Environment and Landscape Consultant)
- PBA – Peter Brett Associates (Transport / Utilities Consultant)
- FL – Fulcrum (Sustainability / Engineering Consultant)
- CP – Capitol (Railway Consultant)
- WoB – West of Bewbush (the site)

Issues 3 to 5: Policies for Development – *Whether the JAAP provides sufficiently clear and comprehensive guidance to developers on the various necessary requirements to provide a functioning neighbourhood.*

General questions:

1. See CND Examination Statement 3 (Issue 3)

Policy questions:

WB 12: should there be a requirement for a landscaped western edge to prevent further expansion as per Horsham Core Strategy CP 6? Should the main structural areas of open space be listed?

2. The purpose of CP 6 is not to provide a visual barrier to reduce landscape impact, but to create a significant buffer to future development. The policy will apply to the planning application(s) for WoB, the maintenance of the strategic gap being a wider LDF issue, it being beyond the Area of Search.
3. CND has provided initial views on the landscape issue within the response to Issue 1 (see CND Examination Statement 1). In summary:
 - The Core Strategy policy CP 6 would also apply to the planning application(s) on the WoB site;
 - SLR's landscape and visual assessments completed for CND have indicated that the proposed development will have minimal landscape impact (see the Technical Background submitted by CND in the July 2008 representations);
 - CND would advise that any changes to the conceptual masterplan should be made with regard to this technical evidence;
 - Any future planning applications for development further from the Area of Search should be considered on their own merits.
4. Existing structural vegetation, south of the railway, on the western edge of WoB, includes mature woodland at Pondtail Shaw as well as a dense belt of trees along Hopper's Brook. To the north of the railway, the western edge of the development area is defined by Kilnwood Copse (which lies immediately to the west of the development area) along with the mature hedgerow that forms the western boundary of the area between the copse and the railway. These peripheral features provide a clear and defensible boundary to the proposed development area.
5. SLR's landscape and visual assessments, which include computer modelling to assess the effects of vegetation features as well as ground topography, have clearly

indicated that the above vegetation would be sufficient to screen views of the proposed development from viewpoints in the AONB and from within the Horsham-Crawley Strategic Gap (see the Technical Background submitted by CND in the July 2008 representations).

6. It is considered, therefore, that there is no need to list the main areas of structural space as these are identified within the Conceptual Masterplan. These include: a broad area along the southern edge of the railway line which includes the re-routed Bewbush Brook; a narrower belt along the northern edge of the railway line; a green lane along the northern boundary of the site (north of the A264); and large areas of open space west of Hopper's Brook and south of Bewbush Brook, in the north-eastern corner of the site.
7. CND proposes to withdraw representations (ref. WBSUB224, 225 and 226) on landscape following further discussions with CBC/ HDC as CND's believes that pre Hearing changes are proposed on landscape.

WB 13: should there be mention of measures to protect the integrity of nearby off-site nature conservation areas?

8. CND support policy WB13 (ref. WBSUB228) but originally objected to an element of the supporting text (ref. WBSUB227).
9. The nature conservation areas that are near to or within the proposed development area, and which are shown in whole or in part on the JAAP Conceptual Masterplan, comprise;
 - House Copse – ancient woodland designated as a SSSI;
 - Buchan Hills Country Park, part of which is an SNCI with a small SSSI (Buchan Hill Ponds) designation around some pond features;
 - Kilnwood Copse- ancient woodland with two areas designated as sites of nature conservation importance (SNCI);
 - Hyde Hill SNCI which lies adjacent to Ifield; and
 - Ifield Pond and "water park" designated as an SNCI.
10. House Copse, which lies to the north of the development area and is separated by Kilnwood Lane, by properties at Kilnwood and at Farm Cottage and their adjoining fields/paddocks, is protected under statutory legislation due to its designation as a SSSI. The designation arises from the copse being identified as a block of ancient woodland which is identified in the Biodiversity Position Statement (CD ref HDCB25) as being "isolated". There are no plans to make the copse more accessible, hence it

is considered that the JAAP does not need to identify any specific measures to protect its integrity. CND believes that CBC/ HDC will forward a pre Hearing change on the Conceptual Masterplan to avoid any confusion in respect to the plan currently showing a pedestrian/ cycle/ equestrian link across Kilnwood Lane which lies to the north of the site. There is no intention (nor any ability in terms of land control) to facilitate a link across Kilnwood Lane at this point, merely a link onto the lane.

11. The Buchan Hill Ponds SSSI has similar protection to House Copse and was designated due to it being an excellent example of hammer ponds on the underlying Tunbridge Wells Sand. The development site is underlain by Weald Clay such that there is no linkage to these ponds and no necessity to specify measures to protect their integrity.
12. The other non-statutory designated nature conservation sites have been designated for the following reasons;
 - Kilnwood Copse – ancient woodland;
 - Hyde Hill – urban SNCI with combination of semi-natural woodland, thick hedgerows, streams and rough grassland; and
 - Ifield Pond – diverse submergent and emergent pond vegetation and small area of woodland to south-east of pond.
13. The integrity of these nature conservation sites would not be affected by the development proposals in that there are no credible off-site effects, other than drainage and public access that could affect these sites.
14. The sustainable drainage systems (SuDS) scheme (required by Policy WB 17) would control off-site run-off to greenfield rates such that there would be no intensification of run-off to Ifield Pond. The Kilnwood Copse and Hyde Hill sites are upstream of the site drainage catchment and would be unaffected by site drainage.
15. Public access to the Ifield Pond SNCI may increase given the linkage between the development site and the network of footpaths within the SNCI that already exists. This SNCI lies wholly within the boundaries of Crawley's "built-up" area and there is no evidence to date that such development is incompatible with the integrity of this site being retained.
16. Similarly, public access to the southern part of the Hyde Hill SNCI may increase in that there are footpath links between the southern part of this site and the development area. However, this area is designated as an urban SNCI and lies

directly adjacent to lfield such that it is not considered that its integrity (which depends on its diversity of habitats) is sensitive to increased footpath use.

17. Accordingly, it is concluded that it is unnecessary to make mention of measures to protect the integrity of nearby off-site nature conservation areas in Policy WB13 or supporting text. It is likely that the objection (ref. WBSUB227) will be withdrawn as it is expected that CBC/ HDC will make a pre hearing change to satisfy the concerns.

WB 14: has this assessment already been carried out? If so, is the policy necessary?

18. It is understood that this policy is the subject of a Pre Hearing change to reflect CND's original objection. As such the original objections to policy WB14 will be withdrawn (ref WBSUB229 and 230).

WB 15: what links are there to the west on the Conceptual Masterplan?

19. There are no off-site links to the west shown on the Conceptual Master Plan other than Kilnwood Lane and the A264. There are four 'green corridors' which reach through the development area towards the west, and these are illustrated on the JAAP Conceptual Masterplan. These are as follows:

- Kilnwood Lane, along the northern boundary of the site;
- along the northern edge of the railway;
- along the southern edge of the railway, (and past/through Pondtail Shaw);
and
- along the southern boundary of the site, north of the A264.

These will act as wildlife corridors and landscapes and offer the potential for pedestrian links to the west.

20. The Third Draft Transport Assessment (ref. CDOth1) Figure 2 illustrates the relevant existing Public Rights of Way. This has been considered and incorporated on the JAAP Conceptual Masterplan. Further new internal linkages, for example using the green corridors may be proposed as part of masterplanning the site which is a matter for the planning application stage. WoB benefits from the potential to enhance linkages south to the AONB and west to the countryside beyond.

21. The land to the west is proposed to remain as a strategic gap as it is outside of the original area of search.

22. CND believes that a number of pre Hearing changes are proposed by CBC/ HDC made in light of the SoCG.

WB 16: ¶ 4.36 says “60 dBA or above”. Which is it?

23. CND support policy WB16 (ref. WBSUB232). CND suggests that 4.36 might be better worded “above 60 dB(A)”.

WB 17: would SuDS work given the underlying Weald Clay? Would development add to the risk of flooding in existing residential areas in Crawley?

24. CND support policy WB17 (ref. WBSUB233). The site has a low level of flood risk as demonstrated by the Strategic Flood Risk Assessment (CD ref. HDCB29).
25. The Weald Clay which underlies much of the development site is effectively impermeable. Where the clay is obscured by landfilled deposits, these have been determined by thorough site investigation to comprise clay rich sub-soils and will also be of low permeability.
26. There is no definition of sustainable drainage systems (SuDS) in the submission JAAP but they have been variously described by other councils as “*techniques used with developments to help return excess surface run-off to natural watercourses*”¹ or “*an approach to managing rainfall in developments that replicates natural drainage*”²
27. In some instances, and where appropriate ground conditions allow, the natural response to rainfall would be for it to infiltrate into the ground before it flows (as groundwater) into a watercourse. Where natural ground conditions are low permeability (and there is no effective groundwater system, as at West of Bewbush) the natural response of rainfall is to run-off via surface drains to watercourses.
28. At WoB, therefore, the SuDS system proposed as part of a planning application should emulate this natural response to rainfall by channelling run-off through drains to the main watercourse, i.e. the Bewbush Brook. The natural delaying effect of overland flow to a drain across vegetated land can be lost when large areas of a development site are hard surfaced. Therefore, SuDS systems in development sites that are underlain by low permeability soils could include green roofs (on large buildings), porous paving (in large paved areas) and attenuation ponds (to intercept and store sudden surges in run-off from the site).
29. Work carried out by SLR, on behalf of CND, has confirmed that flood attenuation storage (including an allowance for a 30% increase to cater for the possible effects of

¹ Highland Regional Council Scotland, Glossary for various Local Plans

² Burnley Local Plan, 2nd Draft, May 2003. Defined in the Glossary section

climate change) can be incorporated within the WoB site area. These storage areas would have sufficient capacity to restrict run-off from the developed site, during a storm with a 100 year return period, to that equivalent to the run-off from a storm with a 2 year return period affecting the existing “greenfield” site. Such SuDS features would therefore, reduce, rather than add to, the existing level of risk of downstream flooding.

30. CND considers that the development will also add flood attenuation in the area downstream of the site. This is particularly relevant given recent experience in Ifield Green, where flooding on 13 December 2008 caused a nursing home to have to be evacuated. The presence of a SUDS system, with storm water storage, at West of Bewbush would tend to act to reduce (effectively to smooth out) flows downstream of the site and should reduce the probability or intensity of any future flooding in this area.

WB 18: should the site provide a household waste recycling facility (¶ 4.43)?

31. CND support policy WB18 (ref. WBSUB235)
32. WSCC provides 14 large Household Waste Recycling Sites (HWRSs) for the public to use to dispose of their own household waste. It is reported that these sites have a current throughput of 254,000 tonnes per annum, i.e. c 18,000 tpa each on average. (source: - Background Paper 2: Waste Arisings and Waste Management Capacity, July 2008, WSCC Minerals and Waste Development Framework).
33. In the vicinity of the WoB site, WSCC has provided HWRSs at Crawley and Horsham and most other major towns in West Sussex have a HWRS. It is considered unlikely, therefore, that the modest increase in the population of Crawley and Horsham through the WoB development proposals would, in themselves, warrant the development of a new HWRS.
34. WSCC has recently considered the need for strategic waste sites and has indicated that there will be sufficient capacity to achieve its target of 50% recycling of municipal solid waste (which includes household waste) by 2026 as soon as a recycling facility currently being constructed at Ford is completed (Background Paper 6: Strategic Waste sites, October 2008, WSCC Minerals and Waste Development Framework). The key material planning fact is that this background paper has been issued in advance of any adopted (or emerging) Minerals & Waste LDF position.

35. This up to date information suggests that there will be no need for an additional Household Recycling Site at WoB. However, it is thought that there could be merit in providing a local recycling point (or points) within the WoB development in order to maximise the potential for the recycling of waste streams that are not commonly segregated in doorstep recycling (e.g. white goods, rubble, timber and green wastes).
36. Such a recycling point(s) would be compact and could be accommodated within an 'Environmental Infrastructure Area', which could also incorporate, for instance, a CHP facility and/or water recycling facility, if it is agreed with WSCC that such provision would be beneficial. CND believes that CBC/HDC in response to CND's representations (notably Wbsub234) are proposing a pre Hearing change on the matter of the Environmental Infrastructure.

WB 19: should the provisions of ¶ 4.50 be in the policy?

37. CND has previously objected to policy WB19 (along with the Conceptual Masterplan) with regard to open space (ref. Wbsub236/Wbsub261). The Conceptual Masterplan elements will be withdrawn in response to proposed pre Hearing changes.
38. CND would encourage that the other changes proposed in representation Wbsub236 be considered for the reasons outlined. This will assist with the masterplanning of WoB by providing necessary flexibility. CND's present interpretation of the JAAP Conceptual Masterplan is given in Examination Statement 6 (Issue 6) which illustrates the likely areas of open space proposed at the planning application stage.
39. Furthermore, and in addition to CND's original representations, CND believes that CBC/HDC propose to delete paragraph 4.50 and reference to 'Built Sports Facilities'. Should this be the case CND would support the deletion.
40. The dual use of school facilities including built sports is accepted practice and recognised in relevant Government Guidance, including 'Schools for the Future – Designs for Learning Communities Building Bulletin 95'. As such it is also considered unnecessary for Policy WB19 to include reference to this point.

WB 20: should this be amended to "2-3 form entry" to reflect ¶ 4.55? Should the policy refer to the phasing/timing of provision? Are there two schools (¶ 4.103)?

41. CND objected to policy WB20 and the supporting text in the July representations (ref Wbsub238). CND partly justified this on evidence presented in CND's Technical Appendix 6, Savills, submitted in July 2008. Part of this evidence has since been

withdrawn following further ongoing population and education evidence gathered by EFM Ltd as part of the preparation of a planning application (see explanation letter and revised Appendix 6 appended to this Examination Statement). Also appended to this note is the Submission Version Briefing Note on Population Assumptions prepared by EFM for CND which briefly explains the reasoning.

42. Notwithstanding this, CND's core point that the likely population should be determined at the planning application stage remains.
43. CND believes that CBC/HDC are forwarding a pre Hearing change with regard to providing the flexibility for either a 2 or 3 form entry school, this additional flexibility is supported, although to simply state 'a primary school' would be preferred. CND's further population work has shown that it is unlikely that 2,500 dwellings would warrant the construction of two primary schools.
44. CND's principal concern is that although in planning for a primary school (in terms of the broad site area and need) the relevant URS Neighbourhood technical background (ref CDHDCB32) helps to provide a steer, it should not be taken literally by outlining expected numbers of children based on a hypothetical population assumption. The situation is resolved by adopting the suggested changes in representation WSub238. At the planning application stage the broad housing mix will be fixed, therefore providing a likely population assumption. This would provide a situation that is actually stated in paragraphs 4.51/4.52 of the JAAP (as supported by CND, ref WSub237).
45. CND has made a similar point with regard to healthcare and community centre provision (refs WSub213/ WSub214) as outlined in CND Examination Statement 3.

WB 21: is ¶ 4.64 a hostage to fortune?

46. CND support the employment policy WB21 (ref. WSub239). CND notes the Inspector's concerns with regard to 4.64 which may permit inappropriate uses within the neighbourhood centre and mixed use area of the neighbourhood.

WB 22: Are the targets viable and feasible in line with paragraph 33 of PPS1 supplement “Planning and Climate Change”? Has the potential impact on the delivery of housing supply been fully explored? Will the policy have an impact on affordable housing delivery? Could the viability exception result in the provision of no sustainable construction beyond that stipulated nationally?

47. CND has liaised with CBC/HDC with regard to sustainability. A number of pre Hearing changes have been proposed, many of which CND will support. Matters related to CND’s position on sustainability have also been outlined in CND’s response to Issue 1 (Examination Statement 1).

48. There remain some issues that are outstanding, for which a note is appended to this Statement and should be referred to for further detail (see the appended ‘Policy WB22 Background Note’). The outstanding issues (refs. WSub241, 264 and 260) being:

- CND object to the renewable target of 50% for the reason that no evidence has been provided that is able to test the robustness of the target or the impact on delivery;
- CND object to the requirement of specific Code for Sustainable Homes level/s, which takes minimum performance beyond the targets soon to be required by Building Regulation for water and energy use, for the reason that no evidence has been provided that tests the impact on delivery;
- CND object to the requirement to provide 105litre per person per day, which is above the requirements of the proposed changes to Building Regulations, for the reason that no evidence has been provided that tests the impact on delivery.

49. CND believes that the most secure route to ensure that the Plan is found to be sound would be to use the Government’s policies and guidance as the justification for setting and achieving targets for sustainable construction and renewable energy.

50. The targets set with regards to the requirement for the Code for Sustainable Homes (CfSH) levels and the % onsite energy from low and zero-carbon (LZC) technologies have not been proved to be viable and feasible in line with Para. 33 of the PPS1 Supplement, for the reason that no evidence basis has been presented, nor has it been demonstrated how such proposals would effect the housing delivery.

51. The Energy and Planning Act (2008) makes a specific point that when setting energy efficiency standards, which the application of the CfSH would do, CBC/HDC must use

those that are set out or referred to in regulations made by the Appropriate Authority (i.e. the Secretary of State). In the Secretary of State's proposed amendments to the South East Regional Spatial Strategy (South East Plan) the application of higher energy and water efficiency standards than those set out in the building regulations was not acceptable. Therefore, the Council must have regard for the direction given by the Secretary of State in the South East Plan amendment.

52. To date the Councils have not demonstrated what impact the advanced CfSH and Low and Zero Carbon requirements would have on the delivery of housing supply.

53. Under the 'Design and Quality Strategy' report (2007) produced by the Housing Corporation (now Homes and Communities Agency, HCA), the funding schemes will require that the whole of the Code 3 be applied to HCA funded housing from 2008-2011, Code 4 from 2012-2015, and Code 6 from 2015 onward. The application of the CfSH requirements to the affordable homes element of WoB will not prejudice the affordable homes delivery as the HCA's requirements are in advance of these.

Conclusion

54. This Statement covers a number of JAAP issues, which are in the main sound. CND believes that there are areas whereby the Inspector should recommend changes. Many of these relate to pre Hearing changes which CND anticipate to be forwarded by CBC/HDC. Prior to viewing these CND must reserve position, although as indicated it is CND's intention to withdraw a number of representations following the proposed changes. Those areas of change being:

- Landscaped references
- Biodiversity/ Nature Conservation references
- Removal of the archaeological parkscape designation
- Conceptual Masterplan linkages
- Open Space
- Education (Primary School references)

What parts of the JAAP are unsound.

55. As also outlined in Statement 3 CND has a greater issue as regards the population assumption, this also relates to the specific education requirements. CND believes that the approach needs to be amended to reflect the position advocated in paragraph 4.52 as regards the population and consequent exact social infrastructure provision being determined at the planning application stage. The JAAP is presently too prescriptive and as such may be 'ineffective' in this respect.

56. In terms of sustainability, CND has through dialogue with CBC/HDC resolved most of the July 2008 representations. CND would wish to see the changes outlined as regards a 10% on site renewable energy requirement and also for there to be JAAP consistency with the building regulations and water requirements to assist with the delivery of WoB. No evidence has been provided by CBC/HDC to the contrary.

Which soundness test(s) it fails and why

57. The JAAP needs to be consistent with national planning policy on sustainability and also 'effective' in terms of its prescription. At present the approaches to population and sustainability fail these tests, in part.

How the JAAP can be made sound. Including the precise changes & wording that is sought

58. The suggested changes to policy WB20 are outlined in representations ref. Wbsub238.

59. The sustainability suggested changes are appended to this Statement (to meet CND representations WSub241, 264 and 260).

END OF STATEMENT

5th January 2009



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Dear Pauline

Appended to CND Examination Statement 4

Withdrawal of representations on the Joint Area Action Plan (JAAP): West of Crawley prior to the Examination following further technical work and liaison with Crawley and Horsham

CND Technical Appendix 6: Critique of the 'Neighbourhood Assessment' and 'Transport' URS Studies

I write with regard to the Joint Area Action Plan (JAAP): West of Crawley and the representations submitted by our client Crest Nicholson Developments Ltd (CND) as the principal consultants of the proposed allocated site West of Bewbush (WoB). In light of further technical work and analysis we are withdrawing a number of representations prior to the commencement of the formal hearings of the Examination. Those representations which are being withdrawn will be supplied via separate correspondence shortly.

The representations and technical evidence related to the Population Assumption is detailed below. The Critique of the 'Neighbourhood Assessment' and 'Transport' URS Studies, Savills & Peter Brett Associates. VOL 2 submitted in July 2008 has been amended. The reasoning is outlined in this letter.

Representations to be withdrawn

CND is requesting the withdrawal of a number of sections of the submitted Appendix 6: Joint Area Action Plan: West of Crawley Critique of URS Neighbourhood Assessment/ Transport Studies (amendments attached). In addition to this we are also requesting the withdrawal or amendment to part of a number of representations submitted on the formal representation form. Those representations which we request are omitted are shown as being struck through for ease of reference. Those representations which have not been struck through are to remain as formal representations and to be respectively considered as part of the Examination.

Population (and impact on Education, Community Centre, Healthcare policies)

Since the representations were submitted in July 2008, CND has commissioned ongoing detailed analysis of population projections to support initial masterplanning exercises (undertaken by EFM Ltd). This analysis has shown to concur with those in the JAAP Evidence Base (separate Appendix refers appended to Examination Statement 4). The updated analysis has provided more data which will be used at the planning application stage. We are therefore requesting the withdrawal of our representations submitted on population assumptions (Relevant sections of Appendix 6). The conclusion is that the URS population assumption is robust.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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Retail

With regard to retail provision on the site, CND has undertaken more detailed market analysis and it is clear that it is unlikely that retailers would be willing to take up such a large level amount of floorspace. Due to this CND concur with the proposed provision of retail on the West of Bewbush site outlined in the JAAP and withdraw their representations in relation to this (Relevant sections of Appendix 6 and ref. WBSUB218). This neighbourhood level of provision has been successful with the Crawley neighbourhood model.

Education

More detailed analysis of population generation and educational requirements has been undertaken since the submission of the representations which concur with the County Council's forecasted peak numbers of children to be generated by the development. Based on this a number of sections relating to the number of children to be generated by the development and required educational provision have been deleted (Ref WBSUB238 and relevant sections of Appendix 6). However CND, in line with their representation (ref. WBSUB238) continue to request that the JAAP be amended to state that there will be a requirement for the provision of educational facilities based on the population and need generated, without any specific numerical requirement prior to detailed population projections at the time of implementation.

Open Space

CND request the removal of the representations making specific reference to open space provision and population projections, as recently more detailed population analysis has been undertaken which broadly concurs with that of the JAAP (Ref. WBSUB236 and WBSUB213). CND continue to maintain the representations which agree that open space provision should be about both quantity and quality and should take account of existing provision (Relevant sections of Appendix 6 and ref. WBSUB236). CND Examination Statement 4 refers.

CND support the proposed pre Hearing change relating to open space on the Conceptual Masterplan.

In summary we therefore wish to withdraw the following:

- The withdrawal of representation WBSUB218
- The deletion of specific sections which relate to the population assumption of the JAAP with representations WBSUB213, WBSUB214, WBSUB236, WBSUB238 and Appendix 6 (see attached representations).

Can you please confirm that the above mentioned representations as withdrawn and/or amended in accordance with the representations attached and submitted to the Inspector for consideration.

Those amendments to CND's July 2008 representations do not include new material, merely deletions.

Please do not hesitate to contact me should you have any queries.

Yours sincerely,

Charles Collins
Savills Planning & Regeneration

WEST OF BEWBUSH

JOINT AREA ACTION PLAN

EXAMINATION IN PUBLIC

Appendix to Examination Statement 4

Amendments to Technical Appendix 6 (July 2008) Critique of URS Neighbourhood Assessment

Withdrawn Elements of Evidence

December 2008

Preamble

In July 2008 to support representations submitted on the Joint Area Action Plan (JAAP) Crest Nicholson Developments (CNDs) submitted Technical Appendix 6 which acted as a critique of the URS Neighbourhood Assessment and Transport Studies. Since then and a part of the preparation of a planning application more research has been undertaken by CND including a review of the likely population impacts/ community infrastructure needs arising from the development (undertaken by Savills and EFM Ltd). This has resulted in a change of position with regard to the population assumption as well as with regard to the retail provision. Some representations have therefore been withdrawn. As part of this elements of Technical Appendix 6 have also been withdrawn as indicated by this Addendum.

No new evidence is being presented. This Appendix merely outlines evidence being withdrawn.

Matters relating to this Appendix are discussed in CND's Examination Statements 3 and 4.

Those parts withdrawn are shown by a ~~cross through~~.

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- ~~▪ Section 6: Retail~~
- Sections 7, 8, 9 & 10
- Conclusions

3.0 URS APPRAISAL OF TRANSPORT STUDIES

Appendix A Network Rail: JAAP Preferred Option Representation, November 2007

1.0 INTRODUCTION & SUMMARY

- 1.1 Savills has been appointed by Crest Nicholson Developments Ltd (CND) as the principal consultants on the proposed allocated site west of Bewbush (WoB). This technical appendix acts as a critique of two of the URS studies (July 2007) on transport and neighbourhood assessment prepared as background evidence to support the JAAP.
- 1.2 We welcome the comprehensive background evidence published to support the JAAP and support the overall allocation believing the JAAP to be sound. This is in accordance with the approach outlined in PPS12 (paragraphs 2.1 - 2.2). ~~The issues raised here relate to technical issues with regard to some of the JAAP policies as regards the population assumption and influence on the community infrastructure policy approaches and also those towards retail provision.~~ The comments with regard to transport merely highlight that subsequent evidence such as the 3rd Draft Transport Assessment (May 2008) prepared by Peter Brett Associates needs to be given much more weight and have superseded much of the URS findings. Comments are also forwarded with regard to open space and are made to support representations which seek to highlight the latest urban design best practice.
- 1.3 In general we believe the topics covered to be sound throughout the URS studies, however, we would comment on some of the assumptions made, the figures quoted and the methodology adopted. Overall the studies form a useful input to the JAAP as background evidence and have steered the neighbourhood principle. ~~The issues raised seek to justify representations made with regard to some individual policies and do not seek to undermine the overall soundness of the JAAP.~~

Summary of Comments on the Neighbourhood Assessment

- 1.4 ~~The population assumption is made at 2.57 people per dwelling by URS. This has been calculated rather arbitrarily as an average of local wards and taken from the Western Neighbourhoods Position Statement (Crawley Borough Council, 2006). There is a more robust and best practice method to outline the anticipated population which factors Census 2001 data trends alongside the planned mix by housing tenure and type. The population figure is vital as it impacts upon the education, healthcare and open space calculations/projections and as such must be robust and reflect the future characteristics of the development. The exact provision of these based on actual need is considered a matter for agreement at the planning application stage. As such to utilise the URS background to directly require a certain level of community infrastructure is premature. It is only the principle of such provision which should form part of the JAAP.~~

-
- 1.5 Policy WB 10 dwelling mix is strongly supported and provides sufficient flexibility to assist with delivery of each Core Phase of the development. ~~Given this flexibility, the dwelling type/tenure mix is not fixed at this stage, however as an example a mix of 25% one bedroom flatted, 20% two bedroom flatted, 25% two bedroom houses, 25% three bedroom houses and 5% four bedroom houses would result in an average of 2.15 persons per dwelling based on this example mix. An increase in the proportion of 3 to 4 bedroomed houses increases the likely population.~~
- 1.6 The recommendations towards urban villages are welcome given the sustainability credentials and principles to achieve the Neighbourhood principle. The role of modern approaches to architectural vernacular and the character created will be important given the need to attain at least Code for Sustainable Homes Levels 3 and above. This should be reflected in policy WB 4 on design to which a representation of support has been made given the flexibility.
- 1.7 The education provision should be for one new primary school within the Neighbourhood and financial contributions toward secondary education such as Ifield Community College to increase its capacity. The primary healthcare provision analysis is limited in the URS study and more work is needed. Savills has undertaken its own research and found that approximately 2.5 Full Time Equivalent (FTE) GPs will be needed based on an example mix. However, again this would be a matter for the planning application stage, and as such we object to the prescriptive nature of policy WB 6 (Healthcare).
- 1.8 Recreation should be based on the local spatial context and should reflect the over provision of playing pitches in adjoining Bewbush. As such provision of passive open space and linkages to the countryside beyond will be more appropriate for the Neighbourhood to avoid large areas of unnecessary formal green space. The Neighbourhood creates opportunities to integrate with Bewbush via utilising its healthy provision of recreation space. Objections to policy WB 19 (Recreation and Open Space) and supporting text are submitted in this regard.
- 1.9 ~~Retail and other A1-A5 provision should form a neighbourhood centre that includes a medium-sized food store to meet part of the substantial need for convenience floorspace identified by the Council's retail study (CBRE 2005) including demand from new residents with the community west of Bewbush. The exact provision and need should be determined by the planning application as supported by a retail appraisal.~~

Summary of Comments on the Appraisal of Transport Studies

- 1.10 The URS report should be considered in the context of the date it was prepared. The assessment work and the positions of the Highways Agency or Network Rail have since progressed.
- 1.11 The updated assessment work included in the Transport Assessment (TA) and in the update Addendum Technical Appendix 1 submitted as part of CND's representation reconfirms that the development can be delivered without a relief road and with a package of sustainable transport measures, demand management and junction improvements.
- 1.12 The degree of weight that should be attributed to the URS transport study at this submission stage is therefore considered minimal. It provided a role in the formation of the JAAP at Preferred Options stage. We therefore advise that the URS study be carefully considered alongside the up to date evidence presented by PBA on behalf of Crest, which forms the update Addendum Technical Appendix 1 and submitted evidence 3rd Draft TA (May 2008).

2.0 URS NEIGHBOURHOOD ASSESSMENT

Section 1.1: Population Assumptions

- 2.1 — ~~An average figure of 2.57 persons per dwelling is quoted as being the figure used to calculate the Neighbourhood population (page 3). This has been calculated as an average of local wards and taken from the Western Neighbourhoods Position Statement (Crawley Borough Council, 2006). It is not clear from the URS Study whether these position statements are based on Census information.~~
- 2.2 — ~~In the URS study the ‘society effects’ that result from the change of population (the impact of the additional population on factors such as education and healthcare) are measured through assessing the magnitude of the proposed development. We agree with this approach in principle but with the strong caveat that the number of people generated from the west of Bewbush Neighbourhood is accurately and robustly determined. We believe this to be a matter for the planning application stage, once the detailed mix of dwellings is known. The URS figures show that for 2,500 dwellings, 6,425 people will be generated from the development. This will have an impact on existing Neighbourhoods and Crawley as a whole.~~
- 2.3 — ~~In order to establish a robust measure of the potential population we believe that the 2001 Census provides the most accurate data. The URS studies utilise data from the four Neighbourhoods of Langley Green, Ifield, Gossops Green and Bewbush. We suggest that a more robust method would be to utilise the Lower Super Output Areas (LSOAs) as set out on the Office of National Statistics (ONS) website¹. This data is provided at the Borough level as at Ward level the dataset is too small to be accurate. It assesses the likely impacts by dwelling type and tenure. This table illustrates the population multipliers for Crawley Borough.~~
- 2.4 — ~~The Census data shows that children of all ages can be found in 1-bed flats. However, by most definitions this would lead to overcrowding and would not be appropriate. Therefore, these children have been re-distributed proportionately across the two and three bedroom units.~~

¹ www.statistics.gov.uk

Multipliers which could be used to Calculate the Population of the Proposed Development

Age	Unit Size				
	One	Two	Three	Four	Larger
Market Flats					
Aged 0-3	0.000	0.102	0.164	0.167	0.000
Aged 4-10	0.000	0.063	0.075	0.167	0.000
Aged 11-15	0.000	0.034	0.089	0.000	0.000
Aged 16-17	0.000	0.022	0.036	0.000	0.097
Total Aged 18+	1.378	1.520	1.774	2.222	1.839
Market Houses					
Aged 0-3	0.000	0.169	0.188	0.142	0.156
Aged 4-10	0.000	0.216	0.330	0.293	0.343
Aged 11-15	0.000	0.104	0.203	0.211	0.280
Aged 16-17	0.000	0.050	0.031	0.099	0.114
Total Aged 18+	1.742	1.714	2.003	2.168	2.257
Social Flats					
Aged 0-3	0.000	0.171	0.186	0.600	0.200
Aged 4-10	0.000	0.078	0.239	0.000	0.000
Aged 11-15	0.000	0.032	0.091	0.000	0.000
Aged 16-17	0.000	0.021	0.076	0.600	0.100
Total Aged 18+	1.185	1.401	1.539	2.400	1.700
Social Houses					
Aged 0-3	0.000	0.272	0.247	0.186	0.190
Aged 4-10	0.000	0.416	0.579	0.363	0.657
Aged 11-15	0.000	0.188	0.359	0.394	0.569
Aged 16-17	0.000	0.051	0.110	0.131	0.153
Total Aged 18+	1.429	1.643	1.824	2.000	1.854

Source: Savills (2007), interpretation of ONS Crawley Borough Statistics

2.5 We believe that the more robust average of 2.15 per dwelling utilising the Crawley/ Horsham guidance on the mix of type and tenure is more appropriate. This average will of course fluctuate given the type/ tenure/ mix of the properties², which will vary with masterplanning and market considerations and hence are matters for the planning application stage. The figure of 2.15 per dwelling is derived given the development assumption overleaf.

² The present figure is derived from the JAAP Joint Background Paper and Statement on Housing with regard to the affordable housing mix of 25% 1 bedroom flatted, 20% 2 bedroom flatted, 25% 2 bedroom houses, 25% 3 bedroom houses and 5% four bedroom houses. At this stage it is assumed for calculation purposes that the same mix will be applied for market housing.

Total Dwellings: 2,500
 Total Population: 5,376
 40% Affordable Provision
 Mix of Properties
 — 25% 1 bedroom flatted: 375 market (total with affordable 625)
 — 20% 2 bedroom flatted: 300 market (total with affordable 500)
 — 25% 2 bedroom houses: 375 market (total with affordable 625)
 — 25% 3 bedroom houses: 375 market (total with affordable 625)
 — 5% 4 bedroom houses: 75 market (total with affordable 125)

2.6 — As an example, this figure would be adjusted to 2.33 per dwelling if a higher proportion of larger market properties were provided as follows (affordable provision remains as above) to deliver a more balanced community:

Total Population: 5,830
 — 15% 1 bedroom flatted: 225 market (total with affordable 475)
 — 15% 2 bedroom flatted: 225 market (total with affordable 425)
 — 10% 2 bedroom houses: 150 market (total with affordable 400)
 — 35% 3 bedroom houses: 525 market (total with affordable 775)
 — 25% 4 bedroom houses: 375 market (total with affordable 425)

2.7 — This would still be well below the 2.57 figure given by the URS study.

2.8 — It is clear that the proportion of people will vary by house type and tenure. Population data alongside a calculation of the proposed housing type, tenure and mix provides a robust estimate of population.

2.9 — The following figures have therefore been outlined:

• Crawley Borough Average	2.44 people per dwelling ³
• URS Study	2.57 people per dwelling
• Average Per Dwelling Utilising Type & Tenure	2.15 – 2.33 people per dwelling

Summary

2.10 — The population projection in the URS study is questionable; a lower projection will be needed that reflects the elements of the masterplan/ Neighbourhood principle more accurately. This is the robust approach which should be subject to further study/ examination at the planning application stage. A sound JAAP need only outline the neighbourhood principle and requirement for particular uses ‘in principle’ and where appropriate index linked planning contributions requirements.

Section 2: Neighbourhood Concept

- 2.11 The recommendations towards urban villages are welcome given the sustainability credentials and concepts to achieve the Neighbourhood principle. The role of modern approaches to architectural vernacular and the character created will be important given the need to attain at least Code for Sustainable Homes Levels 3 and above.
- 2.12 New forms of architecture may be necessitated which could involve the re-orientation of buildings, taller designs and contemporary styling, these being necessitated by the need for high levels of insulation to achieve the higher thresholds of the Code. A representation with regard to design (policy WB 4) has been forwarded.

Section 3: Education

- 2.13 ~~The figures quoted on page 20 will depend on the population assumption set out previously. The table below illustrates the likely population expansion using the population figures illustrated earlier⁴. These figures also include the likely children generated from WoB.~~

Year	Dwellings Built	Market	Affordable	4-10 years (Cumulative Population)	11-15 years (Cumulative Population)	Total Population
2011/12	150	90	60	34	48	260
2012/13	350	150	100	405	61	1,013
2013/14	400	150	100	489	110	1,873
2014/15	400	150	100	274	159	2,733
2015/16	400	150	100	358	208	3,593
2016/17	400	150	100	443	257	4,453
2017/18	400	150	100	527	306	5,376
TOTAL	2,500	1,500	1,000	528	306	5,376

- 2.14 ~~This example in the table shows that the new development will be likely to produce 528 children aged 4-10, and 306 children aged 11-15. These figures differ from those quoted in section 4.52 to 4.57 (note: no figures have been derived for 0-4 years)~~

³ Taking the Crawley 2001 Census Population of 99,744 along with the total dwellings of 40,855.

⁴ The table above is derived from the JAAP Joint Background Paper and Statement on Housing with regard to the affordable housing mix of 25% 1 bedroom flatted, 20% 2 bedroom flatted, 25% 2 bedroom houses, 25% 3 bedroom houses and 5% 4 bedroom houses. At this stage it is assumed for calculative purposes that the same mix will be applied for market housing.

2.15 ~~Post 16 education is not presently an obligation as such and we do not believe that it is appropriate to include this for the purposes of these studies. However, for illustrative purposes and as a consideration for transport planning the above example would yield 118 persons aged 16-17 which is above the figure quoted in paragraph 4.56 of the JAAP.~~

2.16 ~~We believe that the more robust population estimate should be used which will have an impact on the number of children within WoB. The West Sussex Pupil Product Ratio (PPR) quoted in the URS study should only be used if the Councils are confident that this takes a robust Crawley specific view. The desired school surplus should stand at between 2-3% not 5% as stated on page 15 (this being an Audit Commission Recommendation which may not take into account local circumstances).~~

2.17 ~~Government Circular 05/05 contends that planning gain is required to make proposals acceptable in planning terms. In other words to ensure that the development contributes to the need it creates. Requiring a large surplus in school places is arguably a matter of public education funding, a choice made by the Local Education Authority. As such the below analysis has considered the provision against an average 2.5% surplus.~~

2.18 The travel to school implications are also relevant in terms of ensuring that the projected increase in children is served by schools which are close by. As such the primary schools which serve the development should be:

- Bewbush Community
- Waterfield
- Gossops Green

2.19 The logical secondary schools to serve WoB are Holy Trinity CoE and Ifield Community College. However, given that Ifield has a much larger spare capacity it seems that this School should accommodate the growth.

2.20 In terms of the present education provision it seems that the new development will be likely to necessitate the following:

Secondary

- A proportionate S.106 financial contribution toward enhancements to Ifield Community College (North West Sector) as given by West Sussex CC (2007). This College will likely accommodate part of the surplus pupils given the existing spare capacity which is estimated at 140.4 pupils (87% given the figures on page 18). A further proportion ~~estimated at approx 194 pupils using the population assumption of 2.15 people per~~

~~dwelling could be accommodated via extensions to the school financed via S.106 and implemented from 2014/15 when the population has reached the required level [(306-140.4)+ 2.5% surplus = 194]. The exact numbers will vary given the desired surplus and type/ tenure mix proposed.~~

- Secondary provision should be viewed in the overall context of an increasing surplus (see table page 18); as such no new standalone school would be necessary within the development. This is acknowledged in the JAAP.

Primary School

- In terms of primary school provision it seems that the three existing primary schools in the Bewbush area will service the development in the initial phases. There is a healthy surplus already, averaged at 24.17% (26.67% - 2.5%). Bewbush Community School (25% projected surplus in 2011), Waterfield (29% projected surplus in 2011) and Gossops Green (26% projected surplus in 2011).
- Given the surplus it is considered that up to approximately 382.2 pupils can be accommodated by taking up the spare places. ~~As illustrated by the table earlier that would leave only approximately 145.8 pupils, enough for one small new primary school within WoB. This could be a 7 class, 210 pupil establishment (as given by DFES, BB99).~~

The above analysis does not reflect other ongoing developments in the area which could have an impact on existing provision with Crawley.

Summary

2.21 The new development will require the provision of one new primary school and a financial contribution towards secondary provision and as such the principle of policy WB 20 of the JAAP is supported. ~~We take issue with some of the likely pupil generation figures and advise that as this will depend on the overall population assumption that these be removed from the JAAP as matters for the planning application stage.~~

Section 4: Health

~~2.22 As with education, health provision will depend on the population assumption.~~

~~2.23 A development of 2,500 dwellings is projected to generate approximately 5,376-5,830 population given the baseline analysis given earlier. The URS figures show that for 2,500 dwellings 6,425 people will be generated from the development. As such CND cannot support at this stage the projected need for 2.9-4.3 GPs and the URS study research. We have~~

~~conducted our own healthcare study below (in November 2007) which we consider to be more robust than the URS survey which is not complete.~~

~~2.24 Sustainable travel implications are also relevant in terms of ensuring that the projected increased population is served by GPs which are close by. The five surgeries in the western neighbourhoods are therefore those suitable for study.~~

2.25 Circular 05/05 states that planning gain is required to make proposals acceptable in planning terms. As such we would question the validity of requiring funding towards operational elements of healthcare. It is clear that the guidance seeks to ensure that the development contributes to the need it creates. This need is the primary care provided by General Practitioners (GPs). Policy WB 6 as worded makes reference to a Primary Care Centre including other elements such as dentistry, whilst in principle it is agreed that such should be planned, the actual financial provision of non primary care elements through planning gain is questioned. It is considered that these issues will be best considered at the planning application stage alongside those of actual need based on the housing mix and population assumption.

2.26 Information is missing on the numbers of patients on the roll from the analysis on table 4-1 (page 24) of the URS Study. Data is mostly shown for those surgeries in other parts of Crawley and not the five surgeries on the western side of the town. These western surgeries are highly relevant given the need for close access. Savills has undertaken its own research of the existing provision of the five surgeries to ascertain the level of additional provision needed from WoB.

Surgery	No. GPs Full Time Equivalent (FTE)	Accepting Patients	Patients on Roll Approx	Number of Patients per GP
Bewbush Medical Centre@ Tel: 0844 4771813 Tracy Roberts	2	yes	6,100	3,050
Coachman's Medical Practice Tel: 01293 531 951 Sarah Ruse	4	yes	9,000	2,250
Gossops Green Medical Centre*# Tel: 0844 8151238	3.5	yes	7,000	2,000
Ifield Drive Practice*	4	yes	10,000	2,500
Langley Corner Surgery# 0844 8151893 Beverly Wallace	5.75	yes	9,800	1,704
TOTAL	19.25	n/a	41,900	2,177

Source: Savills Telephone Survey: November 2007

* Presently looking for new premises
Plans to build/ improve capacity on existing site
@ Spare capacity for one more GP on site

2.27 It is significant that new GP facilities are proposed to be provided in the western neighbourhoods (page 25). This has been confirmed by telephone conversations with the various Practice Managers. These improvements are needed regardless of the new Neighbourhood proposals, however, there may be opportunities to add GP provision to the proposed Healthy Living Centre in Bewbush, part of which could be provided as part of the Neighbourhood provision. Further liaison and consultation with the PCT will be needed. Currently, the West Sussex Primary Care Trust is carrying out a review of the North East area, which includes Crawley. In due course information on Population and Health Status will be released.

2.28 The principle of each GP having 1,800 patients will need to be balanced against the present operational ability of the surgeries. The table in para 2.26 of this report shows that those surgeries surveyed in the West of Crawley are operating at an average number of patients of 2,177. The 2006/7 West Sussex Primary Care Trust Review (Health Care Commission Website)⁵ revealed that following outcomes:

- All or almost all practices in the PCT could offer a GP appointment within 48 hours
- All or almost all practices in the PCT could offer an appointment to see a primary care professional within 24 hours.

The above indicators suggest that the PCT is meeting standards at the current GP/ Patient ratios. ~~If the number of GPs required for the proposed development were based on the present average (2,177) then the Neighbourhood would warrant approximately 2.5 FTE GPs given the example population baseline given earlier. The table shows the range of FTE GPs required based on the range of potential population that could be generated and a GP/patient ratio of 2,000 and 2,177.~~

Potential Population generated	No of FTE GPs required (based on an average of 2,000 patients per GP).	No of FTE GPs required (based on an average of 2,177 patients per GP).
5,376	2.7	2.5
5,830	2.9	2.7

⁵http://2007ratings.healthcarecommission.org.uk/patientsandthepublic/searchforhealthcareproviders.cfm/FaArea1/customWidgets.trustquestions_show_1/cit_id/10896/question/3

- 2.29 Given the additional healthcare requirements it is suggested that the principle of an accessible Primary Care Centre located in the neighbourhood centre be supported but not the explicit requirement for four GPs. It seems from initial analysis that such a level is not warranted and in any case it should be a matter for the planning application stage when details of the number of dwelling types and sizes have been identified as this will directly influence the population generated and number of GPs required.

Summary

- 2.30 The analysis of the existing capacity of the five GP surgeries to the west of Crawley has shown that they are operating at an average of 2,177 patients per GP. ~~Given the local average the new development will need to cater for an additional 2.5 GPs based on the example housing mix given.~~ The exact provision and scale of the Primary Care Centre is a matter for the planning application stage.

Section 5: Recreation

- 2.31 As with health and education provision the projected population will be important when determining open space provision. Table 5-1 (page 29) outlines the spatial context for open space provision and is also useful for masterplanning.
- 2.32 The NPFA standards are used which in the absence of specific local standards is appropriate (as given by PPG17). The Crawley Borough Playing Pitch Strategy (2005) should be viewed in context. Applying the minimum requirement for 1.2 hectares for active playing pitches to WoB is too high given the large supply in Bewbush of 15.22 ha (1 ha per 596 people).
- ~~2.33 A development of 2,500 dwellings is projected to generate approximately 5,376 to 5,830 population from the example baseline analysis given earlier. The URS figures show that for 2,500 dwellings 6,425 people will be generated from the development, which has been argued to be too high.~~
- ~~2.34 As such in broad terms 12.90 to 13.99 hectares of open space will be needed and not 15.4 hectares as suggested by Table 5-4 (page 33). Given this an objection to policy WB 19 (Recreation and Open Space) is forwarded, not against the principle of providing open space as indicated by the Conceptual Masterplan but against the prescriptive requirements which it is considered are not based on latest best practice and which cannot be justified until the housing mix is known.~~
- 2.35 We concur with the view that open space provision should be about quantity and quality (page 30). As such masterplanning approaches should consider the local spatial context including the green infrastructure such as links to potential country parks, the AONB to the south,

ancient woodland and other passive areas of open spaces. The high provision of existing playing pitches in Bewbush is a material factor. WoB could enhance integration with Bewbush via linkages to this existing provision.

- 2.36 The considerations with regard to open space should be based on modern best practice with a focus on quality and the New Urbanist principles of achieving higher quality multi purpose spaces integrated with development and avoiding large unused spaces which exhibit no sense of ownership. As such the approach should not be an arbitrary 50:50 split in recreation and passive provision.
- 2.37 Crawley has one leisure Centre (K2 located in Tilgate). It is considered within the spirit of Circular 05/05 that the provision of commercially operated centres by WoB will not be appropriate. As such we believe a more prudent use of S.106 financial contributions and on site masterplanning options would be to focus on the need generated by the development. One such example may be to combine funding for the necessary extra education provision at Ifield Community College with additional sports/ recreational facilities there.

Summary

- 2.38 The open space approaches must consider spatial context, and in particular utilise high quality design approaches (the quality elements) and utilise potential passive open space linkages to the surrounding countryside. There is an over-supply of playing pitches in the immediate area and it is important that additional playing pitches are not provided to the detriment of the existing provision. Playing pitches could be implemented as adaptable provision incorporating winter and summer sports (such as Cricket). This will be determined via the masterplanning process.

Section 6: Retail

- ~~2.39 The retail Section 6 is too brief and requires a more robust analysis in retail planning terms as well as in general planning/ urban design terms. There is a clear need to ensure that the new development is self sufficient and has a higher self containment in terms of shopping patterns. As such we believe that more than 2,500 sq m of A1 A5 (perhaps also small scale D2) uses incorporating convenience retail will be needed (perhaps in the range of 3,000 sq m – up to 6,000 sq m) in order to support the development. As such objections to policy WB 9 (Retail) have been forwarded. Further detailed technical evidence will be provided for the Examination as CND prepares evidence to support the planning application.~~
- ~~2.40 The principle of an element of retail within a local centre has been established via the Horsham Core Strategy (policy CP 6) and the Crawley Core Strategy (paras 130-133).~~

- 2.41 ~~The Crawley Core Strategy supports town centre retail growth as outlined at 50,000 sq m net. This points to the overall role of the wider Gatwick sub region to attract more growth to 2026 (as supported by the South East Plan Inspectors Report), the scale of which will vary with location, and following the guidance in PPS6 should be based on a town centres first approach. The Conceptual Masterplan outlines the indicative location of the proposed Neighbourhood Centre.~~
- 2.42 ~~3,000-6,000 sq m of a mixture of A1-A5 uses is a modest amount that reflects the wider growth trends and also the need arising. This is shown by a brief and general quantitative analysis below. This will be expanded upon to form a retail assessment in due course. It will be important to positively plan for this growth within the overall Neighbourhood Principle and masterplanning approach; for example the local centre could also incorporate small scale D2 uses such as a gymnasium, the creation of a vibrant centre being the main qualitative argument for a sustainable urban extension.~~
- 2.43 ~~Local Retail Needs can be established by studying ONS statistics. This provides a rough indication of the likely need derived per dwelling given average household expenditure and the existing retail picture in Crawley (including the present expenditure leakages away from the Town). DEFRA also provides information on Food. The analysis below is not a full retail assessment, however, it does provide a broadbrush indication of what may be required to support the proposed neighbourhood of 2,500 dwellings. This is notwithstanding the findings of the Council's own retail study which demonstrate a need for new convenience retail development in Crawley and are outlined below.~~

Brief Quantitative Analysis: National Trends ONS & Likely Floorspace Generated

- 2.44 ~~The ONS Retail Sales Index (seasonally adjusted) October 2007 showed that in the UK average weekly sales for Food were £3.984billion, this being 37.6 index points higher than in 2000 (index 2000). This shows that the recent trends have been for sales growth. The work undertaken by DTZ for SEERA (June 2006) further confirms the growth trends in the South East.~~
- 2.45 ~~The 'Household Final Consumption Expenditure' (HHFCE) is used to represent traditional consumer spending. The 2004/05 figures showed that an average of £44.70 was spent each week on food and non alcoholic beverages by households⁶. As such 2,500 dwellings would be expected to spend a total of £111,750 per week or £5,811,000 per year. In 2004/05 food made up only a proportion of the average £434.40 weekly expenditure. The ONS defines total household expenditure quite broadly to include a range of items including transport and recreation and culture (the other significant larger areas of spending).~~

~~2.46 The next stage of the assessment is to translate the predicted expenditure on food into net retail capacity by applying sales densities. According to the Atkins Study for Development Options at Crawley (Nov 2005, Annex A: Paragraph 3.5) nationally, average sales densities between 1999 and 2004 amounted to £5,027 per sq m (see Verdict on the High Street, Verdict Research 2004⁷). These figures apply to town centre sites. A neighbourhood centre would be expected to have a lower £ per sq m sales density to reflect lower rents and demand. As such it could be estimated to be 50% lower, ie. £2,500 per sq m. Converting this to gross retail floor space there is potential demand within the development to support some 2,324 sq m of retail floor space for food (only) at the Neighbourhood centre level (£5,811,000/ 2,500 sq m). We would advise that given the growth in retail trends this be considered as a minimum level of convenience retail floorspace.~~

~~2.47 As indicated food only made up around 10.3% of average weekly expenditure. It can therefore be assumed that a higher proportion of other A1-A5 uses will be needed to support demand for amenities and facilities such as small scale comparison units, a post office, chemist, hairdressers, cafes, bars and restaurants etc.~~

~~2.48 Urban design best practice in the Urban Design Compendium 2 (pages 77-83) outlines the need for mixed uses within Neighbourhoods. This could be as high as 1 sq m of provision per 1 additional population. As such given this broad figure the development would need to provide approximately 5,000 sq m of a mixture of A1-A5 uses. We would advise at least 2,500 sq m of this be for a convenience supermarket.~~

Specific Growth for Crawley

~~2.49 CBRE, 2005 Retail Capacity Study for Crawley Borough Council identified the growth levels to be accommodated within the Town Boundary. A proportion of this growth could conceivably go to WoB. In any case the study points to the general growth trends as supported by other regional evidence from SEERA. The study shows that convenience retailing in Crawley is strong.~~

~~2.50 Comparison retailing is focused on the regional centre, which also incorporates some convenience retailing such as Asda on Peglar Way (4,645 sq m net) a Sainsbury's, M&S and Iceland. Convenience retail, although dominant within the town centre is also spread throughout the town, principally in three further locations (all between 4-6km from the Preferred Option West of Crawley site).~~

- ~~■ Sainsbury's at West Green (4,632 sq m net)~~

⁶ <http://www.statistics.gov.uk/StatBase/Product.asp?vlnk=361>

⁷ <http://www.verdict.co.uk/>

- ~~Tesco at Three Bridges (3,394 sq m net)~~
- ~~Somerfield/ Iceland at Broadfield Barton (1,555 sq m net) – this forms a centre.~~

~~2.51 – The study identifies that within the suburbs approx 9,500 sq m (net) convenience floorspace exists, roughly forming four separate and larger sub-centres. In this context there is scope for a larger centre in the Neighbourhood that forms part of this suburban network which takes some of the additional growth. The need and growth of such sub-centres also indicates that local centres such as Gossops Green and Bewbush were not of a sufficient size to meet need. This undermines the argument that the neighbourhood principles should be based on the previous model adopted for the original New Town.~~

~~2.52 – Growth is expected in those 'out of centre' uses in line with expected consumer growth giving a capacity of 12,800 sq m net by 2011 and 14,550 sq m net by 2016 (shown by paragraphs 5.5-5.9 and as shown, in part, by table 5b (i) – appendix 6 of the CBRE, 2005 study).~~

~~2.53 – In addition the need for convenience retail in Crawley Town Centre will grow by 5,969 sq m (net) – increasing from 8,524 to 14,493 sq m (as shown, in part, by table 5a (i) – appendix 6, of the CBRE, 2005 study).~~

~~2.54 – The Authority will therefore need to plan for this growth which the Crawley Core Strategy does for the Town Centre. A positive approach could be to plan for the additional growth to 2016 in the WoB Neighbourhood.~~

~~2.55 – The Holmbush/ Bewbush area falls within 'Study Area 8'. According to the Study more than half of the existing residents shop in out of centre convenience stores (53%). Through the WoB development a proportion of these journeys could be directed to the proposed neighbourhood centre. This would make the area as well as the development more self sufficient and sustainable, as outlined by PPS 6 paragraph 2.41 "In selecting suitable sites for development, local planning authorities should ensure that the scale of opportunities identified are directly related to the role and function of the centre and its catchment".~~

~~2.56 – The CBRE 2005 report concludes that this growth should either be as extensions to the existing stores or directed to the centres (as per PPS6 requirements) and as such the Neighbourhood Centre at WoB should be eligible for allocated growth. It therefore seems that the URS findings for retail provision need to be placed into the broader context of retail need in the area, especially, as without significant convenience retail stores residents will continue to drive to existing out of centre food stores.~~

~~2.57 – The Council should therefore seek to meet the quantitative need identified in the CBRE 2005 Report through a network of neighbourhood centres. This will reduce the need for residents to~~

~~travel to out of centre retail destinations. As set out in our critique, the CBRE report indicates that over half of existing residents (53%) in the Holmbush/Bowbush area are travelling to out of centre convenience stores to undertake their shopping. A new food store within the neighbourhood centre will impact on existing out of centre food stores and not existing neighbourhood centres. It is also pertinent to note that the retail provision proposed will not have a detrimental effect on Crawley Town Centre, given its relatively small scale against the significantly larger major regional centre (which caters mostly for regional comparison retailing).~~

Summary

~~2.58 The present URS study is weak on retail analysis. A larger proportion of retail would be beneficial to existing and new residents, employees of the 8,000 square metres of workspace and rail/ Fastway users. This could comprise approximately 2,500 sq m for a food store and approximately 3,500 sq m for other A1- A5, D2 uses making a local centre of up to 6,000 sq m. This is likely to meet the local shopping needs of the proposed community. The varied offer could incorporate a range of smaller uses each of between 250-500 sq m in size. The centre will incorporate a mix of local employment which will create further demand for new retail floorspace. Given the above objection and suggested rewording to Policy WB 9 has been forwarded. Further evidence and retail analysis will be provided as CND prepares the planning application.~~

Conclusions

- ~~▪ The Neighbourhood principle should be based on an accurate and robust population projection as a baseline. This affects all of the variables. The URS figure of 2.57 people per dwelling is considered too high and does not reflect the housing by tenure/ type influence. We suggest that between 2.15-2.33 people per dwelling would be more accurate as illustrated by the example mix of type and tenure. These issues will be established and determined by the planning application.~~
- New Urbanist principles are a robust method to achieve greater sustainability but must also have regard for the need for carbon neutral development by 2016.
- The education provision should be for one new primary school within WoB and contributions toward Ifield Community College to increase its capacity. The exact provision and need should be determined by the planning application.
- The primary healthcare provision should be determined by an analysis of present numbers of roll at the five western GP surgeries. The average number of patients per GP for west of Crawley is 2,177, thus resulting in a need for the Neighbourhood to provide approximately 2.5 FTE GPs

~~based on the example population assumption. The exact provision and need should be determined by the planning application.~~

- Recreation should be based on the local spatial context and should reflect the over provision of playing pitches in Bewbush. As such provision of passive open space and linkages to the countryside beyond may be more appropriate for the site to avoid large areas of unnecessary green space.
- ~~Retail and other A1-A5 provision should form a neighbourhood centre that includes a medium-sized food store to meet part of the substantial need for convenience floorspace identified by the Council's retail study (CBRE 2005) including demand from new residents within the community west of Bewbush. The exact provision and need should be determined by the planning application as supported by a retail appraisal.~~

3.0 URS APPRAISAL OF TRANSPORT STUDIES

Summary of Comments on the Appraisal of Transport Studies

- 3.1 It should be acknowledged that the URS report was prepared in July 2007 and therefore the assessment work and the positions of the Highways Agency and Network Rail have significantly progressed.
- 3.2 The 3rd Draft Transport Assessment (TA) for West of Bewbush forms part of the shared evidence base along with a supporting Addendum Report (AR) in CND's Technical Appendix 1 submitted as part of the representations. This demonstrates that development at West of Bewbush can be delivered without a relief road and would benefit from a package of sustainable transport measures and junction improvements (such as demand management measures).
- 3.3 The weight attributed to the URS study in the formation of the JAAP should be carefully considered alongside the up to date evidence presented by PBA on behalf of Crest. It is evident that whilst the URS study formed useful background in the formulation of the preferred options stage, matters have now been further examined and clarified since.
- 3.4 The Appraisal sets out the Highways Agency's (HA) position on page 18 which was prepared in advance of the broad assessment work being undertaken. The HA submitted a statement (dated 5 September 2006) regarding the findings of the broad transport assessment, during the examination of the Horsham Core Strategy. This is not referred to in this appraisal. The conclusions are summarised below:
- o *This exercise has demonstrated that a number of highway improvements in the M23 / A23 area will be required by 2026 to enable the delivery of all planned development in the Gatwick sub-region.*
 - o *The nature of these improvements is likely to be in the form of operational and safety measures similar to elsewhere in the South East. Accordingly we feel that such schemes will be capable of delivery.*
 - o *Accordingly, no 'showstoppers' have emerged that might preclude the prospects of development to the west of Crawley. Further work will be essential to identify the improvements in detail and the timing of these in relation to the phasing of development and appropriate funding mechanisms. The HA would require the improvements to be delivered and be in place to match the phasing of the development. Subject to the delivery of this implementation strategy the HA, at this stage, is prepared to withdraw its objection to the principle of development to the west of Crawley.*
 - o *The HA would wish to see every opportunity taken to reduce car-based travel by maximising investment in feasible and effective sustainable transport. To this effect we*

understand that the Fastway service could be extended into the search area with a 6 minute frequency. Other non-car based transport initiatives will be essential whilst the proposed new rail station would be a valuable contributor.

- 3.5 The broad assessment has been refined with new trip matrices from available RSI data (Gatwick BAA, Crawley, East Grinstead and LATS) and incorporating of the Crawley town centre model zoning and network in the Crawley area. The Highways Agency has undertaken tests without a relief road.
- 3.6 Since the adoption of the Core Strategy, the HA has carried out further assessment work. A meeting with the HA on 2 April 2008 confirmed their position and a number of actions:
- The HA is not stating that the relief road should be built but:
 - they had understood it was a committed scheme
 - their strategic model suggests its removal would have a negative impact on the M23.
 - The HA GATS4 model has 35,000m² of employment floorspace at WoB rather than 8,000m², which could significantly change the traffic forecasts to that site.
 - The HA is prepared to consider the local and wider effects of a package of sustainable transport measures proposed at WoB and a demand management strategy. Further GATS4 runs could be undertaken using latest information.
 - Contributions will depend on the effects of development (WoB, West of Horsham, etc.) on M23 J11 etc not on whether the relief road is built.
 - The HA agreed that policy is "new road build is a last resort".
 - The HA is supportive of the sustainable strategy being proposed for WoB, including the single demand managed access.
 - WSCC model and HA GATS4 model show different results for removal of relief road. PBA and HA to share model data (select link analysis) to better understand why the model results differ.
- 3.7 The TA has been undertaken based on the WSCC model, which has been updated following this meeting on 2 April 2008. The details of the changes are explained in the 3rd Draft TA included as shared evidence. There is continued liaison with both WSCC and HA.

Railway Station and Network Rail

- 3.8 Positive discussions with Network Rail (NR) on all issues are currently ongoing and formal correspondence has been exchanged between Crest and Network Rail who have provided detailed information on achieving a new railway station to serve the development and surrounding area. Recent meetings with NR in the first two quarters of 2008 have established the framework necessary to progress through to a formal Asset Protection and Development Agreement. In the early stages of a development to assist the rail industry a "Project Inception Report" is required by NR for circulation and discussion with the DfT and the relevant Train Operating Company (TOC). NR have confirmed their willingness to provide guidance and assistance in compiling this report based on the work done to date. This work is scheduled to commence during July 2008 for an anticipated completion within a month.
- 3.9 Furthermore via master-planning approaches that encourage rail ridership, sufficient passenger volumes are projected to make the station self sufficient without the need for ongoing financial contributions, a point confirmed in principle by the current TOC at the meeting on 3 July 2008. It is accepted however that more detailed ridership analysis needs to be undertaken as part of the overall process. The construction of a new station at West of Bewbush would require the closure of Faygate which given the passenger numbers involved is deemed logical and is supported by rail groups. NR is due to commence a new Sussex Route Utilisation Strategy, (RUS) in January 2009 which reports on the proposed enhancements and improvements to the routes in the designate area. There is a consensus between the parties that subject to a positive outcome of the current work streams the proposal for a new station west of Bewbush could be included within the new Sussex RUS.
- 3.10 We therefore would not concur with the view from Network Rail as given by page 19 of the URS Study and consider it outdated. Network Rail's own Preferred Options JAAP representations support this (see appendix A which includes a copy of their representation). Their position has clearly moved forward and as such their objection in principle no longer stands. Network Rail has undertaken to assist in canvassing both the Train Operating Companies (TOC), passenger user groups, assisting with the Project Inception Report and taking the lead in discussions with the DfT if appropriate. Regular ongoing meetings with NR and the TOC are being held to progress a working framework and the necessary agreement.

General Comments/ Observations

- 3.11 A number of local roads have been highlighted on page 22 of the URS report, as roads which are likely to be impacted upon by traffic generated by WoB. The package of measures identified to support the development seeks to mitigate these impacts. The TA and update

Addendum included in CND's Technical Appendix 1 demonstrate that the impacts can be mitigated.

- 3.12 M23 Junction 11 has been identified as currently experiencing congestion. Traffic Surveys carried out in May 2006 show that Junction 11 of the M23 has limited congestion during the AM peak hour. Queues occur on one of the two lanes on the Brighton Road (or services) approach during the AM and PM peak hours. The M23 off-slip experiences queues on two of the three lanes during the PM peak hour only. Traffic signals have been implemented on the M23/A23 off-slip since these surveys have been undertaken to improve the junction operation.
- 3.13 Table 3.2 on page 25 summarises the trip rates used in the Transport Assessments. It is understood that the trip rates used by Steer Davis Gleeve (for the English Partnerships Consortium) are **vehicle** trip rates, whilst PBA and WS Atkins rates are **person** trip rates. Vehicle trip rates will always be lower than person trip rates.
- 3.14 Preliminary transport modelling results are discussed in Pages 26 and 27. It should be noted that the modelling work has now been progressed culminating in the 3rd Draft TA. Further data is also included in the update Addendum Technical Appendix 1.
- 3.15 The preferred access strategy is discussed a number of times within the report (page 30, 32 and 33). Although this provided an indicative example of where the site could be accessed for the purposes of the preferred options stage in planning terms, it was essentially premature in highways terms to make these statements/ decisions before the neighbourhood was planned, as no technical justification for this preferred strategy existed at that stage. This work has now progressed and the preferred strategy is identified in the 3rd Draft TA.
- 3.16 It is acknowledged that the Councils may wish to undertake studies to investigate the full effects, benefits, costs and potential phasing of a possible Western Relief Road. Page 37 states that this will be led by WSCC. This work has not been carried out to date and the WSCC model is not currently capable of testing such a scheme, as a variable demand model is required, which would also need to be capable of forecasting induced demand. This illustrates that no firm proposals or financial commitments are in place as regards the provision of a full Western Relief Road.
- 3.17 A detailed assessment of the combined impacts of all development within the Gatwick Diamond will be required. It is assumed that this would be the responsibility of WSCC, as the assessments commissioned by the developers are generally focused on their individual development proposals.

Summary

- 3.18 The URS report should be considered in the context of the date it was prepared. The assessment work and the positions of the Highways Agency or Network Rail have since progressed.
- 3.19 The updated assessment work included in the TA and in the update Addendum Technical Appendix 1 submitted as part of CND's representations demonstrates that the development can be delivered without a relief road and with a package of sustainable transport measures, demand management and junction improvements.
- 3.20 The degree of weight attributed to the URS transport study at this Submission stage is therefore considered minimal. It provided a role in the formation of the JAAP at Preferred Options stage. We therefore advise that the URS study be carefully considered alongside the up to date evidence presented by PBA on behalf of Crest, which forms the update Addendum Technical Appendix 1 and submitted evidence 3rd Draft TA (May 2008).

Appendix A

Network Rail: JAAP Preferred Option Representation, November 2007

From: Pollerd Ashley [mailto:Ashley.Pollerd@networkrail.co.uk]

Sent: 05 November 2007 14:35

To: Strategic Planning

Subject: west Horsham and west Crawley Masterplan consultations

Thankyou for consulting Network Rail on the land of West Horsham Masterplan and west Crawley Masterplan.

The proposed growth in this area will have a major impact on Christs Hospital station which currently has very little parking. We would want an upgrade to that station, additional parking (At least 100 spaces) and platform extensions (to 12 coaches) to cater for the expected demand.

Similarly I would expect extra pressure on Horsham station, and additional parking may be required there.

Finally any footpath level crossings within 1000 metres of the development would need to be abolished and replaced by alternatives. The only one nearby is Bakers crossing and this would have to go.

In terms of the Crawley masterplan the comments are similar to Horsham.

We have been in discussion with a prospective developer regarding a new park and ride station at Holmbush as part of this development. Holmbush is located approx half way between the existing stations of Ifield and Faygate. IF this park and ride station is built, then the existing station at Faygate would need to close to maintain journey times on the route.

Were this new park and ride station at Holmbush NOT to happen as part of this development, then as a minimum we will require the lengthening of platforms at both Faygate and Ifield to take 12 coach trains and provision of additional parking spaces at both (at least 100 at each location) to accommodate the anticipated demand. We may also need to provide more car park spaces at Crawley and Three Bridges.

Finally the bridleway / farm level crossings at Kilnwood and Bewbush will need to be abolished and replaced by an alternative means of crossing the line - either a diversion or a bridge. This would easily tie in with the developments proposed new highway. There are a number of footpath crossings in the area that would also need to be closed due to likely increased use. Were traffic impact assessment to show that the development increased use of any of the highway level crossings at Crawley (High Street, Horsham Road) and Roffey Road (approx 1.5 km west of Faygate) then we would seek closure of these crossings also.

Thankyou for considering our comments

Ashley Pollerd

Ref:
Council use only

Have you raised the matter that is the subject of your representation earlier in the process of the preparation of the Document, i.e. before it was submitted?

No	<input type="checkbox"/>	Yes, at Issues & Options	<input type="checkbox"/>	Yes, at Preferred Options	<input checked="" type="checkbox"/>
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If no, can you briefly explain why you did not do so:

N/A

Support or objection

Is your representation a Support or Objection?	Support	<input type="checkbox"/>	Objection	<input checked="" type="checkbox"/>
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If you are Objecting please indicate which test(s) of soundness your representation relates to. (See page opposite for a list of the Tests of Soundness)	7 & 9
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Which part of the document does your comment relate to?

Paragraph No.	-
Policy No.	WB 5 COMMUNITY CENTRE (AMENDED 5/1/09)
Conceptual Masterplan	-

Please note: Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested change, as there will not normally be a subsequent opportunity to make new representations further to original representations.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

If you would like a change to the document, what would that change be?

Please indicate what change to the document could resolve your objection.
<p>Whilst CND support the overall emphasis and direction of the JAAP and the concept of the provision of social and community infrastructure we wish to outline the need to evaluate the required infrastructure on an accurate population assumption.</p> <p>CND has previously commented on the URS studies, stating that it would be more appropriate to base population on the dwelling type/ tenure mix. This can be achieved through each future core phase because of the flexibility offered by policy WB 10 (Housing Mix) - which is supported. CND therefore object to the need to be specific as regards the exact infrastructure provision beyond the principle of a requirement. The likely population is not known, but for example could be between 2.15 and 2.33 people per dwelling as illustrated by the analysis in Technical Appendix 6 (critique of URS Neighbourhood Assessment) when assessed against housing mix.</p> <p>CND therefore object to the prescriptive nature of Policy WB 5 which is contrary to soundness tests 7 and 9, in particular the requirement for a particular floorspace level which may influence ongoing masterplanning. Whilst it is acknowledged that the policy does state approximately, it would be more appropriate to reference within the policy the requirement for a multi use community centre <u>"of a scale appropriate to serve the needs of the development and its population"</u>.</p> <p>CND supports policy WB 8 (Integrated Community Centre). There may be merit in merging WB5 with this policy.</p> <p>This representation relates closely to others submitted on education as well as other community infrastructure matters such as healthcare and retail. These are needed to align the JAAP with the available evidence base and to ensure sufficient flexibility in advance of the planning application (test of soundness 7 & 9).</p>

Can your representation be considered in writing, or is it necessary to participate in the oral part of the Examination?	Written representations		Participate at the oral part of the Examination	X
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If wish to participate at the oral part of the Examination please outline why you consider this to be necessary.
The neighbourhood assessment and assumptions made require careful examination.

Ref:
Council use only

Have you raised the matter that is the subject of your representation earlier in the process of the preparation of the Document, i.e. before it was submitted?

No	<input type="checkbox"/>	Yes, at Issues & Options	<input type="checkbox"/>	Yes, at Preferred Options	<input checked="" type="checkbox"/>
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If no, can you briefly explain why you did not do so:

N/A

Support or objection

Is your representation a Support or Objection?	Support	<input type="checkbox"/>	Objection	<input checked="" type="checkbox"/>
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If you are Objecting please indicate which test(s) of soundness your representation relates to. (See page opposite for a list of the Tests of Soundness)	7
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Which part of the document does your comment relate to?

Paragraph No.	4.7
Policy No.	WB 6 HEALTHCARE (AMENDED 5/1/09)
Conceptual Masterplan	-

Please note: Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested change, as there will not normally be a subsequent opportunity to make new representations further to original representations.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

If you would like a change to the document, what would that change be?

Please indicate **what** change to the document could resolve your objection.

Whilst CND support the overall emphasis and direction of the JAAP and the concept of the provision of social and community infrastructure we wish to outline the need to evaluate the required infrastructure on an accurate population assumption.

CND has previously commented on the URS studies, stating that it would be more appropriate to base population on the dwelling type/ tenure mix. This can be achieved through each future core phase because of the flexibility offered by policy WB 10 (Housing Mix) - which is supported. CND therefore object to the need to be specific as regards the exact infrastructure provision beyond the principle of a requirement. ~~The likely population is not known, but for example could be between 2.15 and 2.33 people per dwelling as illustrated by the analysis in Technical Appendix 6 (critique of URS Neighbourhood Assessment) when assessed against housing mix.~~

Paragraph 4.7 states that the equivalent of three to four GP surgeries will be required to meet the additional demand from the development. This statement supports the need therefore for flexibility in the policy. CND has also submitted a supporting representation to paragraph 4.52 which adopts an approach where the educational services will be 'dependent on up-to-date population projections' for the neighbourhood and the specific size and type of dwellings to be built. This approach should be translated across all infrastructure provision evaluated and determined by population projections.

The related policy to paragraph 4.7 (Policy WB 6) refers to one surgery of four GPs which is derived from the population assumptions made by the URS evidence base. As yet the exact need is not defined. Furthermore to base the GP assumptions solely on the URS evidence base would not be robust as the GP analysis is incomplete (pages 23-27 of URS Study). Savills in drafting Technical Appendix 6 conducted a survey of local GP surgeries and against the example higher end population assumption of 2.33 persons per household found that at most the development would generate a need for 2.9 FTE GPs.

We suggest that the reference in 4.7 to the exact number of GPs be deleted and wording incorporated such as "The neighbourhood will generate demand for primary healthcare facilities which will need to be provided to meet the population and need generated".

We therefore also object to the prescriptive nature of Policy WB 6 in particular the requirement for a four doctor surgery. We suggest that the policy be reworded to comply with soundness test 7 as follows:

"The development should incorporate a Primary Care Centre located within or adjacent to the neighbourhood centre incorporating GP facilities, dental services, voluntary and social services and a pharmacy. The scale of the Primary Care Centre will be based on the population and need generated from the development proposal."

Can your representation be considered in writing, or is it necessary to participate in the oral part of the Examination?	Written representations		Participate at the oral part of the Examination	X
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If wish to participate at the oral part of the Examination please outline why you consider this to be necessary.

The neighbourhood assessment and assumptions made require careful examination.

Ref:
Council use only

Have you raised the matter that is the subject of your representation earlier in the process of the preparation of the Document, i.e. before it was submitted?

No
 Yes, at Issues & Options
 Yes, at Preferred Options

If no, can you briefly explain why you did not do so:

N/A.

Support or objection

Is your representation a Support or Objection?	Support	<input type="checkbox"/>	Objection	<input checked="" type="checkbox"/>
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If you are Objecting please indicate which test(s) of soundness your representation relates to. (See page opposite for a list of the Tests of Soundness)	7/9
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Which part of the document does your comment relate to?

Paragraph No.	3.6, 3.8, 3.11, 3.15, 3.18, 4.46
Policy No.	WB 19 RECREATION & OPEN SPACE (Also Para 4.51) (AMENDED 5/1/09)
Conceptual Masterplan	-

Please note: Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested change, as there will not normally be a subsequent opportunity to make new representations further to original representations.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

If you would like a change to the document, what would that change be?

Please indicate **what** change to the document could resolve your objection.

Savills, on behalf of CND, have submitted a critique of the URS study in terms of open space provision (Technical Appendix 6). CND supports the provision of open space to meet the 6-acres per 1,000 population NPFA Standard. However, the housing mix will be determined through the Masterplanning process and development appraisal and it is this that will determine the predicted population of the neighbourhood. These are matters for the planning application once the exact provision and mix is known for each Core Phase.

~~CND considers that the average household size (2.57 persons per household) upon which the Council's open space requirements are based is too high compared with the CND assessment (up to approximately 2.33 persons per household) which is based on an example housing mix (as outlined by Technical Appendix 6).~~ CND fully support the flexibility offered by WB10 (Housing Mix) which allows for the mix to be determined at the planning application stage, and given this CND therefore recommend that the first criterion for open space provision in Policy WB19 should be amended to read:

'the amount of open space to meet NPFA standards of 2.4 hectares per 1000 population;'

The above would also be in accordance with the JAAP present paragraph 4.51 which CND supports which states *"the specific level of open space required will to some degree be dependant on up to date population projections for the neighbourhood and the specific size and type of dwellings to be built. This position will be reviewed as each core phase planning application is submitted"*.

CND also believes that the quality and variety of open spaces, meeting local needs and addressing current issues of over and under-provision, is as important as quantity. Neighbouring Bewbush currently has an over-provision of playing pitches and poorly-maintained play areas. This is indicated by the URS Neighbourhood Assessment (July 2007).

The west of Bewbush site will have a clear hierarchy of green spaces creating significant recreational opportunities and retaining existing valuable woodland areas for a blend of nature conservation and public access. The hierarchy creates opportunities at all scales:

- Strategic linkages to and between open spaces including Mill Pond, Broadfield Brook, the AONB areas south of the site and west towards Faygate.
- A Local Park between the neighbourhood and Spruce Hill Brook for formal sport, recreation, green links and nature conservation including significant wet areas for surface water balancing. This space will have an important function in relating to, and integrating with, Bewbush. It is important that development fronts onto the Local Park to create a strong edge and natural surveillance.
- Linear green spaces following brooks and strong tree belts, acting as corridors for wildlife and people and also providing potential sustainable drainage functions.
- Greens north of the railway line and in the west of the development for play and formal recreation.
- Urban squares within the Neighbourhood Centre as meeting places, spill-out areas for the non-residential uses adjoining them, public art and hard landscape elements.
- 'Green streets' or homezones within the residential areas for play, seating and amenity.
- CND will also explore the potential for innovation in the provision of active space within residential areas which could include safe, semi-private communal space within blocks and wider community use of the primary school site.

Adjoining the station, in the southern parcel, will be a linear open space area which will act as a pedestrian/cycle linkage and also as an area for flood attenuation. The extent of this area is still being technically assessed and will be refined in time for the planning application, but at this stage it is important to define this in the pedestrian/ cycling network and its drainage function.

In summary, the 50/50% split between formal and informal open space required by Policy WB19 is considered too prescriptive and would not address current problems with existing local provision. It would also unduly restrict the design-led Masterplanning process in advance of a

planning application. The JAAP supporting text for Policy WB19 acknowledges the need for flexibility and potential improvement of existing open space in Bewbush as contributing towards the open space requirement. We would therefore recommend that the second criterion for open space provision in Policy WB19 should be amended to read:

'a balance of formal and informal open spaces to meet local needs:'.

Given the need for additional flexibility and standards which relate to the local circumstances CND also request that a number of paragraphs be amended to remove the specific references to the size of areas, which at this stage is not fully known.

CND would like references to 'play area of some 1,200 sq m (0.12ha)' removed from the following paragraphs:

3.6, 3.8, 3.11 and 3.18. CND suggest that the text reads simply 'a neighbourhood play area (or equivalent)'

Furthermore the following paragraphs make specific references to hectare size of open space:

3.6, 3.15 and 3.18. These figures can only be approximate as they relate from the Conceptual Masterplan exercise and URS population evidence. It would undermine further masterplanning and the detailed planning applications to be overly prescriptive at this stage. As such CND request that the word 'approximately' be added before all hectare size open space references in the paragraphs.

In accordance with the reasoning above CND also request that paragraph 4.46 is amended to delete references to quantity and the 50:50 split. The paragraph should be amended as follows:

"The neighbourhood should include provision of open space. The Conceptual Masterplan and Policy WB 19 – Recreation and Open Space outline a direction regarding the type, scale and location. It is acknowledged that a degree of flexibility is essential to ensure the neighbourhood's needs are catered for".

The amendments suggested by this representation are required not only to provide sufficient flexibility (test of soundness 9) but also to be in accordance with the available evidence base (test of soundness 7).

Can your representation be considered in writing, or is it necessary to participate in the oral part of the Examination?	Written representations	Participate at the oral part of the Examination	X
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If wish to participate at the oral part of the Examination please outline why you consider this to be necessary.

The Open Space requirements are fundamental to the implementation of the Conceptual Masterplan and subsequent planning applications.

Council use only

Have you raised the matter that is the subject of your representation earlier in the process of the preparation of the Document, i.e. before it was submitted?

No Yes, at Issues & Options Yes, at Preferred Options

If no, can you briefly explain why you did not do so:

N/A

Support or objection

Is your representation a Support or Objection?	Support <input type="checkbox"/>	Objection <input checked="" type="checkbox"/>
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If you are **Objecting** please indicate which test(s) of soundness your representation relates to. (See page opposite for a list of the Tests of Soundness)

7&9

Which part of the document does your comment relate to?

Paragraph No.	4.53, 4.55, 4.56
Policy No.	WB 20 EDUCATION (AMENDED 5/1/09)
Conceptual Masterplan	-

Please note: Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested change, as there will not normally be a subsequent opportunity to make new representations further to original representations.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

If you would like a change to the document, what would that change be?

Please indicate **what** change to the document could resolve your objection.

Overall CND support the emphasis and majority of the wording of the policy as this will allow for sufficient flexibility regarding the neighbourhood/ population assumption and provision of community infrastructure at the planning application stage. The reasoning, including an example housing mix is outlined in Technical Appendix 6.

In order to assist with the plan flexibility and in accordance with the JAAP text on the role of the Conceptual Masterplan (notably paragraph 3.2) that states its 'illustrative role and intended location of specific land uses' CND recommends that the policy wording of the second bullet be amended as follows;

"A three forms of entry primary school in the broad location identified on the Conceptual Masterplan".

Whilst CND support the overall emphasis and direction of the JAAP and the concept of the provision of social and community infrastructure we wish to outline the need to evaluate the required infrastructure on an accurate population assumption.

CND has previously commented on the URS studies, stating that it would be more appropriate to base population on the dwelling type/ tenure mix. This can be achieved through each future core phase because of the flexibility offered by policy WB 10 (Housing Mix) - which is supported. CND therefore object to the need to be specific as regards the exact infrastructure provision beyond the principle of a requirement. ~~The likely population is not known, but for example could be between 2.15 and 2.33 people per dwelling as illustrated by the analysis in Technical Appendix 6 (critique of URS Neighbourhood Assessment) when assessed against housing mix.~~

CND has submitted a supporting representation to paragraph 4.52 which adopts an approach where the educational services will be 'dependent on up-to-date population projections' for the neighbourhood and the specific size and type of dwellings to be built. This approach should be translated across all infrastructure provision evaluated and determined by population projections.

As such CND would like the specific references to the likely population of children arising from the development removed from paragraphs 4.53, 4.55 and 4.56. Although CND support the 'approximate' references.

Paragraph 4.53 states that around 300 children up to 4 years old will be living in the neighbourhood. CND suggest that this statement be deleted and wording incorporated such as "The neighbourhood will include children of up to 4 years old and as such there is a requirement for the provision of nurseries based on the population and need generated".

Paragraph 4.55 states that approximately 550 primary school pupils will be living in the neighbourhood. CND suggest that the reference in 4.55 be deleted and wording incorporated such as "The neighbourhood will include children of primary school age and as such there is a requirement for the provision of one three form primary school, the exact size of which will be based on the population and need generated".

Paragraph 4.56 states that approximately 400 secondary school pupils and 40-50 sixth from students will reside in the neighbourhood. These figures are derived from the population assumptions made by the URS evidence base and as yet the exact need is not demonstrated. We suggest that the reference in 4.56 be deleted and wording incorporated such as "The neighbourhood will include children of secondary school and sixth form age and as such there will be a requirement for index linked planning contributions toward the enhancement of existing establishments based on the population and need generated".

This representation relates closely to others submitted on community infrastructure matters such as healthcare and retail. These are needed to align the JAAP with the available evidence base and to ensure sufficiently flexibility in advance of the planning application (test of soundness 7 & 9).

Can your representation be considered in writing, or is it necessary to participate in the oral part of the Examination?	Written representations		Participate at the oral part of the Examination	X
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If wish to participate at the oral part of the Examination please outline why you consider this to be necessary.
The neighbourhood assessment and assumptions made require careful examination.

WEST OF BEWBUSH

JOINT AREA ACTION PLAN

EXAMINATION IN PUBLIC

Appendix to Examination Statement 4

**SUBMISSION VERSION BRIEFING NOTE ON POPULATION
ASSUMPTIONS**

DEVELOPMENT OF LAND AT KILNWOOD – WEST BEWBUSH

Proposed minor amendments and clarifications

(Input from EFM Ltd)

Introduction

EFM Ltd has been asked to review Sub-section 1.1 (Population) and Section 3 (Education) of the URS document **Studies and Work to Support Crawley Borough Council and Horsham District Council Preferred Option Joint Area Action Plan** (July 2007) – **Neighbourhood Assessment** from the perspective of the proposed development at Kilnwood – West of Bewbush.

Sub-section 1.1 Population

In respect of the proposed development: the URS' population forecast has been tested by EFM, for 2500 dwellings with 1700 delivered by the end of 2016 and the balance by 2018.¹

The test mix comprised:

552	2-bed house (CP1 132 + CP2 294+ CP3 126)
852	3-bed house (CP1 210 + CP2 352 + CP3 290)
500	4-bed house (CP1 120 + CP2 121+ CP3 259)
296	Studio & 1-bed flat (CP1 66 + CP2 141 + CP3 89)
300	2-bed flat (CP1 72 + CP2 142 + CP3 86)

CP= Core Phase

The test applied a range of tenure mixes from 20% affordable (80% market sale) through to 50% affordable (50% market sale) with RSL rent dwellings held at 50% of the affordable component.

The test structure was based on a Chelmer² forecast for Crawley for a total 2500 additional dwellings in the appropriate time bands, adjusted for mixes, other than the Crawley stock mix presumed by the Chelmer forecast, using the differentials for dwelling size mix and tenure mix derived from the Census Commissioned Output Table CO549 sorted in accordance with the results of the English Household Survey.³

This exercise confirmed that the forecast of an average household size of 2.57 persons is robust and furthermore is not particularly susceptible to change through change of tenure mix.⁴

About EFM Ltd

EFM Ltd is a specialist consultancy preparing age related population forecasts hypothecated to particular residential developments, with a focus on pre-school and school age impacts on the public (maintained) education sector. It also leads the discussions with planning and education authorities on mitigating the impact of new developments on education infrastructure most often, but not always, on behalf of planning applicants. It has completed over 150 assignments across the country since 2001.

¹ The forecasting programme actually places the 700 dwellings into the period ending 2021. It makes no difference to the forecast.

² CHELMER POPULATION AND HOUSING MODEL PC5 2006.1.003 The population model used to identify the quantum of new housing needed in the RSS.

³ CO549 provides the number of people by age by dwelling type, tenure and number of rooms in stock dwellings. The English Household Survey (2003) provides an evidence based conversion of number of rooms (the Census nomenclature) to number of bedrooms for dwellings in Crawley to an accuracy of $\pm 1\%$

⁴ The exercise identified that Crawley is characterised by the average household size, by dwelling type and number of bedrooms, being not significantly different by tenure.

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WEST OF BEWBUSH

JOINT AREA ACTION PLAN

EXAMINATION IN PUBLIC

Appendix to Examination Statement 4

Policy WB22 Background Note : Sustainability

Proposed minor amendments and clarifications



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03401753

FILE NOTE

Date	December 17, 2008
Project	West of Bewbush JAAP
Ref	Statement 4 Appendix WB22PolicyResponseNote
Author	Ian Hamilton

CND is satisfied with the changes presented by HDC/CBC with regards to paragraphs, 4.70, 4.80, 4.72, and the Glossary definition of 'Zero Carbon'.

Existing JAAP Policy/ Text	<p>Paragraph 4.70</p> <p>[4.70] "The form of development set out in this Joint Area Action Plan provides good opportunities to attain the critical mass that would be required for a significant 'community energy system' based on, but not limited to, a CHP system fuelled by locally sourced biomass or other sustainable and low-carbon source of fuel. Such systems depend on relatively dense development layouts and on the inclusion of a significant proportion of non-residential energy users that could provide the daytime demand for heat and hot water. The Councils also recognise that there may be further opportunities for an appropriately sized community energy system to serve new or existing development adjacent to the new neighbourhood covered by this Joint Area Action Plan. The developers will be expected to explore such opportunities in order to off-set carbon emissions of the new neighbourhood and strive to achieve a 'zero carbon development'. It is considered that this opportunity represents an appropriate strategy for the developers to meet the requirement to exceed the Government's national timetable for emissions reduction."</p>
Position	Support change
Background and Basis	n/a
Proposed Recommendation	<p>CND Supports the following HDC/CBC changes:</p> <p>The form of development set out in this Joint Area Action Plan provides good opportunities to attain the critical mass that would be required for a significant 'community energy system' based on, but not limited to, <u>possibly including</u> a CHP system fuelled by locally sourced biomass or other sustainable and low-carbon source of fuel. Such systems depend on relatively dense development layouts and on the inclusion of a significant proportion of non-residential energy users that could provide the daytime demand for heat and hot water. The Councils also recognise that there may be further opportunities for an appropriately sized community energy system to serve new or existing development adjacent to the new neighbourhood covered by this Joint Area Action Plan. The developers will be expected to explore such opportunities in order to off-set carbon emissions of the new neighbourhood and strive to achieve a 'zero carbon development'. It is considered that this opportunity represents an appropriate strategy for the developers to meet the requirement to exceed the Government's national timetable for emissions reduction.</p>

Existing JAAP Policy/ Text	Paragraph 4.72 [4.72] “The need to conserve water supplies is a critical element of the overall strategy for achieving sustainable development in the new neighbourhood. All new development in this area must ensure that it incorporates a robust strategy to both conserve supplies as well as to ensure that wherever possible water is reused and rainwater intercepted and harvested.
Position	Support change
Background and Basis	n/a
Proposed Recommendation	CND Supports the following HDC/CBC changes: The need to conserve water supplies is a critical element of the overall strategy for achieving sustainable development in the new neighbourhood. All new development in this area must ensure that it incorporates a robust strategy to both conserve supplies as well as to ensure that wherever possible <u>feasible</u> water is reused and rainwater intercepted and harvested

Existing JAAP Policy/ Text	Paragraph 4.80 [4.80] “The result of the requirements will be that the majority of the homes provided will meet Level 4 or above of the Code, with early phases meeting Level 3. This is considered a reasonable approach that fully reflects the requirements above relating to energy and water use. At each stage of the development, the emissions reduction targets, which are well known to constitute the largest portion of additional costs required in meeting the Code Levels, will reflect and be led by the Government’s national timetable. This is considered the most reasonable approach in order to avoid prejudicing the requirements set out above for the energy strategy in terms of the delivery of a ‘community energy system’. Further, the early work by the developers on the feasibility of a sizable ‘community energy system’ has suggested that high levels of emissions reduction, and possibly even a net zero carbon development, may be possible by the end of the plan period, assuming the appropriate critical mass can be achieved. Equally, the water consumption target levels for both Code Level 3 and 4 are equal at 105 litres pppd, reducing to 80 litres pppd for Levels 5 and 6. This represents a modest improvement over the maximum consumption levels that will soon be required by Building Regulations and is considered reasonable considering the potential impact of the development on water resources in this area of West Sussex.”
Position	Support change
Background and Basis	n/a
Proposed Recommendation	CND Supports the following HDC/CBC changes: The result of the requirements will be that the majority of the homes provided will meet Level 4 or above of the Code, with early phases meeting Level 3. This is considered a reasonable approach that fully reflects the requirements above relating to energy and water use. At each stage of the development, the emissions reduction targets, which are well known to constitute the largest portion of additional costs required in meeting the Code Levels, will reflect and

	<p>be led by the Government’s national timetable. This is considered the most reasonable approach in order to avoid prejudicing the requirements set out above for the energy strategy in terms of the delivery of a ‘community energy system’ <u>an appropriately scaled energy system</u>. Further, the early work by the developers on the feasibility of a sizable ‘community energy system’ has suggested that high levels of emissions reduction, and possibly even a net zero carbon development, may be possible by the end of the plan period, assuming the appropriate critical mass can be achieved. Equally, the water consumption target levels for both Code Level 3 and 4 are equal at 105 litres pppd, reducing to 80 litres pppd for Levels 5 and 6. This represents a modest improvement over the maximum consumption levels that will may soon be required by Building Regulations and is considered reasonable considering the potential impact of the development on water resources in this area of West Sussex.</p>
Existing JAAP Policy/ Text	<p>Glossary Definition of Zero Carbon</p> <p>[Zero Carbon] “Buildings that produce net zero carbon dioxide emissions over the course of a year, taking into account all the energy used in the building - for lighting, heating, cooling, cooking, running the appliances, and so on. Net zero carbon is achieved by generating energy from renewable sources (at the building or elsewhere on the development site) to offset the energy used by the building and its occupiers.</p>
Position	<p>Support change</p>
Background and Basis	<p>n/a</p>
Proposed Recommendation	<p>Crest Supports the following HDC/CBC changes:</p> <p><u>The definition of ‘zero carbon’ homes has changed a number of times in recent years as the national policy in this area has evolved. The latest officially recognised definition may be found in the most recent version of the ‘Code for Sustainable Homes – Technical Guide’ published by the DCLG (currently October 2008) and available on their website.</u></p>

CND maintains issue with portions of WSub241, WSub264, and WSub260. Specifically paragraphs 4.71, 4.74, 4.79 and their related portions of policy WB22.

The following outlines CND position with the issue within the JAAP under Sustainable Construction and Renewable Energy. Specifically, elements of paragraph 4.71 and 4.79 and the resulting specific text in policy WB22.

Where,

Existing JAAP Policy/ Text	<p>Paragraph 4.71 and WB22</p> <p>[4.71] "Overall through the energy strategy, the developers will be expected to show how a minimum target of 50% of the new neighbourhood's annual (non-transport) energy demand can be achieved through the generation of on-site renewable and low-carbon sources by the completion of the development."</p> <p>And,</p> <p>[WB22] "Overall the energy strategy should show how at least 50% of the development's annual (non-transport) energy needs can be met through on-site renewable and low-carbon generation."</p>
Position	<p>Objection</p>
Background and Basis	<p>The newly passed 'Planning and Energy Act 2008' states that a council may, in its Development Plan Documents, include policies for:</p> <ul style="list-style-type: none"> ▪ a proportion of energy used in development in their area to be energy from renewable sources in the locality of the development; ▪ a proportion of energy used in development in their area to be low carbon energy from sources in the locality of the development; <p>The Act goes on to state that the policies included in DPDs must be consistent with relevant national policies for England.</p> <p>PPS1 Supplement: Planning and Climate Change provides a significant platform for setting targets for renewable energy, where in Para. 30-33 the Council is able to identify clear opportunities for the use of decentralised and renewable or low-carbon energy, and that in setting these targets they can demonstrate that the local circumstances warrant these conditions and that it is properly tested through an evidence basis that considers aspects of market deliverability.</p> <p>In the proposed draft of the South East Plan, the Secretary of State states: <i>"In advance of local targets being set in Development Plan Documents, new developments of more than 10 dwellings or 1000m₂ of non-residential floorspace should secure at least 10% of their energy from decentralised and renewable or low-carbon sources unless, having regard to the type of development involved and its design, this is not feasible or viable.</i></p> <p>The proposed change by the Secretary of State is inline with government policy and guidance on setting renewable energy targets, and this same % has been proposed in the South West Regional Spatial Strategy and has been adopted in the East of England Plan.</p>

	At this point in time the Council has not provided an evidence basis for setting targets for renewables and low carbon and decentralised energy above those identified as reasonable in the draft South East Plan.
Proposed Recommendation	Therefore, we would propose the following changes: [4.71] "...overall through the energy strategy, the developers will be expected to show how a minimum target of 50% 10% of the new neighbourhood's annual (non-transport) energy demand can be achieved through the generation of on-site renewable and low-carbon sources by the completion of the development." And, [WB22] "...Overall the energy strategy should show how at least 50% 10% of the development's annual (non-transport) energy needs can be met through on-site renewable and low-carbon generation."

Where,

Existing JAAP Policy/ Text	Paragraph 4.74, 4.79 and WB22 [4.74] "At the household level the Councils expect measures to be put in place to achieve a maximum level of usage equivalent to 105 litres per person per day (pppd) which represents a saving of approximately one third of current water consumption in Horsham and Crawley. 4.79] "The need to create a sustainable and exemplary neighbourhood incorporating a range of land uses, justifies the requirement for all homes to meet high levels of sustainability performance. Consequently all homes, from the commencement of the development, must meet Level 3 of the Code. Subsequently, from 2013, when the Government emission reduction target of 44% above Part L of the Building Regulations begins to apply, all homes must meet Level 4. Further, the developers must plan to provide a significant proportion of homes at Levels 5 and 6 of the Code in the later stages of the development in line with Government requirements for Zero Carbon Homes." And, [WB22] "A water strategy will be required to show how all homes can be built to achieve a design maximum water consumption target of 105litres or less pppd. New homes should meet a minimum of Level 3 of the Code for Sustainable Homes, rising to a minimum of Level 4 for dwellings constructed in or after 2013. Later phases (post-2016) should include a significant proportion of homes that meet Levels 5 and 6 of the Code <u>in line with Government requirements for Zero Carbon homes.</u> " All non-residential development in the neighbourhood should meet a BREEAM standard of 'Very Good' or its equivalent under any replacement code, with a proportion of buildings meeting the 'Excellent' standard."
Position	Objection

<p>Background and Basis</p>	<p>The 'Planning and Energy Act 2008' states that a council may, in its Development Plan Documents, include policies for:</p> <ul style="list-style-type: none"> ▪ development in their area to comply with energy efficiency standards that exceed the energy requirements of building regulations. <p>However, the Act goes on to state that energy standards should be set out in or referred to in regulations made by the 'appropriate national authority' or set out or endorsed in national policies. 'Appropriate national authority', in this Act, means the Secretary of State. Therefore, the policies proposed by the Secretary of State must be considered as the definitive standard.</p> <p>The Secretary of State, in the 'Proposed Changes to the draft South East Regional Spatial Strategy policy CC4, which refers to sustainable design and construction, states:</p> <p style="padding-left: 40px;"><i>"...seeking the adoption of higher energy and water efficiency standards than those set out in building regulations and for the seeking of the highest possibility rating in the Code for Sustainable Homes is NOT accepted."</i></p> <p style="padding-left: 40px;">And</p> <p style="padding-left: 40px;"><i>"The PPS makes clear that local planning authorities must be able to demonstrate the local circumstances that warrant and allow this and that any local requirement must be set out in a development plan document to ensure it is properly tested."</i></p> <p>This draft RSS is of material consideration for Local development plan documents.</p> <p>Again, as outlined in PPS1 Supplement: Planning and Climate Change (para. 30-33) the Council would be able to set targets ahead of Building Regulations only if they can demonstrate that the local circumstances warrant these conditions and that it is properly tested through an evidence basis that considers aspects of market deliverability. This condition is iterated by the Secretary of State in the proposed changes to the South East Plan.</p> <p>We are at a critical point in the economic well-being of the UK housing market and are having to examine carefully the levels of provision of affordable housing in order to maintain the project viability. In light of these circumstances, unfortunate compromises have had to be made in order to maintain this viability.</p> <p>To date, no evidence basis for this proposed increase in Building Regulations, through the application of the CSH, has been set forth by the Council to support this policy. Therefore, the Secretary of State's recommendations in the draft South East Plan should be considered as a reasonable position.</p> <p>In addition, the setting of a design maximum water consumption target of 105 litres or less pppd is also beyond what will be required to the updates to Part G: Hygiene of the Building Regulations, where 125litres per person per day will be the design target.</p>
<p>Proposed Recommendation</p>	<p>We would propose the following changes:</p> <p>[4.74] "At the household level the Councils expect measures to be put in place to achieve a maximum level of usage equivalent to 105 litres per person per day</p>

	<p>(pppd) <u>unless, having regard to the type of development involved and its design, this is not feasible or viable.</u> This would represents a saving of approximately one third of current water consumption in Horsham and Crawley.</p> <p>[4.79] "The need to create a sustainable and exemplary neighbourhood incorporating a range of land uses, justifies the requirement for all homes to meet high levels of sustainability performance. Consequently all homes, from the commencement of the development, must meet Level 3 of the Code. Subsequently, from 2013, when the Government emission reduction target of 44% above Part L of the Building Regulations <u>2006</u> begins to apply, all homes must meet Level 4. Further, the developers must plan to provide a <u>significant</u> proportion of homes at Levels 5 and 6 of the Code in the later stages of the development. These requirements apply equally to all homes including affordable homes, subject to any additional requirements of the Housing Corporation or successor bodies. <u>Minimum Code level requirements will not exceed the levels required to meet improving standards under Building Regulations Part L or G, such that should Government timelines change for the enforcement of increasing Building Regulations requirements, the Code level requirements may be adjusted accordingly. Flexibility may also be applied, according to feasibility, in relation to achievement of Code levels.</u>"</p> <p>And,</p> <p>[WB22] "A water strategy will be required to show how all homes can be built to achieve a design maximum water consumption target of 105 litres or less pppd.</p> <p>New homes should meet a minimum of Level 3 of the Code for Sustainable Homes, rising to a minimum of Level 4 for dwellings constructed in or after 2013. Later phases (post-2016) should include a significant proportion of homes that meet Levels 5 and 6 of the Code <u>in line with Government requirements for Zero Carbon homes, unless, having regard to the type of development involved and its design, this is not feasible or viable "</u></p> <p>All non-residential development in the neighbourhood should meet a BREEAM standard of 'Very Good' or its equivalent under any replacement code, with a proportion of buildings meeting the 'Excellent' standard, <u>unless, having regard to the type of development involved and its design, this is not feasible or viable."</u></p>
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As per the above discussions, the National and Regional policies do not set specify Code levels, only a rating is required, but rather the guidance refers to changes in Building Regulations and their updates for which the buildings will need to comply. The JAAP policy seeks to set a Code level without consideration for evidence that would justify this requirement. However, Crest has in the past has provided homes that are built to a higher level of sustainability, and would continue to aspire to in the future. However, given the current economic climate it is imperative that the policies in the JAAP are flexible and do not inhibit the delivery of housing for the District.

In light of the recent policy enacted by the National Government (i.e. the Energy and Planning Act) and the proposed changes to the South East Plan made by the Secretary of State, along with the emphasis on having regard for local market conditions, it is felt that the Council would be fully justified in amending the JAAP in order to maintain the Soundness of the Plan.