

STATEMENT OF EVIDENCE – ISSUE 7

CB Richard Ellis

On behalf of the Homes and
Communities Agency (formerly
English Partnerships)

Horsham District Council

Crawley Borough Council

**Examination into the West of
Bewbush Joint Area Action Plan
(JAAP)**

January 2009

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INTRODUCTION

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- 1.1** CB Richard Ellis is instructed as planning consultant for the Homes and Communities Agency (HCA), formerly English Partnerships. The HCA has significant landholdings in Crawley and the surrounding area and has been working with both Crawley Borough Council and Horsham District Council for many years to bring forward its landholdings for development.

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Issue 7: The Longer Term Approach and Monitoring – Whether further land should be allocated for housing or other uses, beyond those set in the time horizon of the present Core Strategies; and whether the mechanism in the JAAP for implementation and monitoring are sufficiently clear, detailed, and meet Government requirements.

Chapters 6 and 7

Are the issues set out in Chapter 6 appropriate for the Joint Area Action Plan? Should not these matters, apart from the Policy Context, be left to the Core Strategy reviews?

In Paragraph 6.16, surely any further development to the West of Crawley could not be achieved through a JAAP review, but rather through the Core Strategies as per WB 28?

- 2.1 In the HCA's view, the matters set out in Chapter 6 are appropriate for inclusion in the JAAP.
- 2.2 The section on "The Longer Term" assists in clarifying that, in accordance with the Horsham Core Strategy, development West of Bewbush is to comprise 2,500 dwellings and be completed by 2018. It is for the Inspector to decide on the appropriateness of paragraphs 6.4 and 6.5.
- 2.3 Paragraphs 6.6 to 6.20 provide, in the HCA's view, a useful summary of the constraints and uncertainties affecting the development of land around Crawley, and justification for Policy WB 28 (see comments below). These factors are very relevant background to the way in which the Area of Study in both Councils' adopted Core Strategies evolved, from which the area covered by the JAAP has been identified. The HCA is aware that the At Crawley study (Atkins, 2004) which informed the Core Strategies of both Councils, is to be reviewed as part of the evidence base for the Core Strategy Reviews, but considers that the conclusions of the 2004 study (which took account of the factors referred to in paragraphs 6.6 to 6.20) are likely to remain valid.
- 2.4 It is accepted by the HCA that the content of paragraph 6.16 should be corrected to make clear that it is the Core Strategies of both Councils that should first be reviewed, and it is of course for those Councils to then decide whether there should be a "strategic sites" approach in accordance with PPS12, June 2008, or whether a further (or amended) Area Action Plan should be prepared.

Is there a need for WB 28? Both statements in it are factual.

2.5 The HCA is very firmly of the view that Policy WB28 should be included within the West of Bewbush JAAP. It is not considered that the statement within the first paragraph is purely “factual”; rather, it is a development control policy which is rightly protecting longer term development potential in an area which has already been acknowledged as a suitable location (in broad terms) to be considered for longer term growth. In the HCA’s view, it would be extremely unfortunate if development within the area of the JAAP were to be designed now without longer term opportunities in mind, given the imminence of the Core Strategy Reviews. In effect, this element of the policy could be seen as a form of “contingency planning”, as advocated in both PPS3 and PPS12.

2.6 By way of background for the Inspector, there were extensive discussions with officers at Horsham and Crawley Councils following the representations of the former English Partnerships at the Preferred Options stage of the JAAP. In the light of those discussions, and the anticipated establishment of what is now the HCA, it was agreed in principle that the future of the HCA’s landholdings would be determined through the Core Strategy Reviews. It is against that background that the HCA supports the second paragraph of Policy WB28.

Has the advice set out in the LDF Monitoring: Good Practice Guide been applied in Chapter 7? (The key test is whether sufficient information is provided to assess policy implementation and its significant effects, having regard to available resources – paragraph 4.28 of the Good Practice Guide).

2.7 The HCA acknowledges that the primary purpose of Chapter 7 should be to monitor the policies within the JAAP throughout the lifetime of the plan. The monitoring and evaluation of objectives and targets within the JAAP is an important part of the feedback mechanisms to ensure the effective operation of the policies and to highlight any revisions that maybe required. The HCA considers that Chapter 7 is essential to establish current and future trends and allow comparison of these trends against policies and targets within the JAAP.

2.8 The HCA considers that Chapter 7 does not contain sufficient information, as currently drafted, to assess policy implementation and its significant effects, having regard to available resources. In addition, the HCA is of the opinion that the Councils’ have not fully applied the guidance set out in the *Local Development Framework Monitoring: Good Practice Guide*.

2.9 The HCA is of the opinion that Chapter 7 should contain a number of indicators, to provide sufficient information to assess policy implementation and significant effects, having regard to available resources. In addition, any update to the LDF indicators contained within the Councils’ Core Strategy which are amended as part of the Core Strategy Review process should be incorporated into the JAAP.

Are SMART targets/outcomes identified in Chapter 7?

2.10 The HCA acknowledges that the primary purpose of Chapter 7 should be to monitor the policies within the JAAP throughout the lifetime of the plan. The HCA considers that Chapter 7 does not contain sufficient SMART targets/outcomes.

2.11 The HCA is of the opinion that Chapter 7 should contain a number of SMART indicators, to provide sufficient information to assess policy implementation and significant effects, having regard to available resources. In addition, any update to the LDF indicators contained within the Councils' Core Strategy which are amended as part of the Core Strategy Review process should be incorporated into the JAAP.