

Statement to the Inspector on behalf of Richard and Stephen Coppen

29th December 2008

This statement has been prepared as a summary of the most crucial points with regard to current Joint Area Action Plan submitted by Crawley Borough Council and Horsham District Council.

- 1) Remediation of recently laid down landfill of such an area and depth is wholly untried and tested. The added complications of contamination through stated cancer-causing chemicals and other noxious substances place a huge question mark over deliverability of the site within timescales required by the respective core strategies.
- 2) The fact that phase 1 of the proposed development does not include infrastructure (shops, schools, doctors etc.) means that any deliverability problems encountered with phase 2 would lead to the 600 homes built under phase 1 being left in isolation without proper amenities.
- 3) Uncertainty surrounds the land remediation strategy, which has not yet been decided or formulated.

Under these points the JAAP does not pass the tests of soundness numbered (iii), (vii), (viii) and (ix). It is therefore required that contradictory statements made within the JAAP regarding remediation and phasing are removed, and replaced with the single statement:

No development will take place within the area West of Bewbush until a full programme of remediation work has been completed.

- 4) Current proposals for development West of Bewbush are inconsistent with both Crawley and Horsham's Core Strategies which state: "Any development West of Crawley must protect and enhance the Ifield Conservation Area". The current preferred option of West of Bewbush offers no protection or enhancement whatsoever to the Ifield Conservation Area and will in fact, have a detrimental impact on the Conservation area.
- 5) Any development on land at the landfill site West of Bewbush will vastly increase water run-off into the local river systems of Bewbush Brook, Ifield Brook and the River Mole. This in turn will increase risk of flooding to the Ifield Conservation area and exacerbate flooding problems in the Ifield area in general and areas further downstream along the river Mole. Crawley Council policies GD23, GD24 and GD25 state that no development will be allowed that might increase additional water run-off or the risk of ground water flooding.
- 6) Development of the Ifield Golf Course presents no increase in flood risk as the area has already been developed to include suitable drainage and therefore, no additional ground water run-off would be expected from development of that location.
- 7) The current economic recession casts serious doubts over the deliverability of affordable housing quotas with such large remediation and infrastructure costs associated with the West of Bewbush proposals.

Under these points the JAAP does not pass the tests of soundness numbered (i), (iv), (v), (vi), (vii) and (ix), and are not in keeping with both HDC's and CBC's core strategies and planning policies. In order to make the JAAP sound the relevant wording should be changed to:

The Ifield Golf Course and Surrounding Land is the preferred option as development of this location is the most cost effective and sustainable option and would provide the best protection and enhancement of the Ifield Conservation Area.

- 8) Lack or provision of a Western Relief Road (WRR) is against recommendations and assessment qualifications by West Sussex County Council who state that a full WRR would be required in the event of any development West of Crawley. Furthermore, the only access currently proposed for the West of Bewbush is from the A264, which will exacerbate existing congestion and rat-running in the area.

Under this point the JAAP does not pass the tests of soundness numbered (i), (vi), (vii) and (ix). The appropriate sections of the JAAP should therefore be changed to read:

Development will occur to the West of Crawley with provision of a full Western Relief Road.

- 9) Both HDC and CBC core strategies require that any new development should not impact on the narrowest part of the Horsham/Crawley Strategic Gap, yet the current preferred option proposal of West of Bewbush is situated within the narrowest part of the strategic gap.

Under these points the JAAP does not pass the tests of soundness numbered (i), (iv), (v), (vi) and (vii). The wording of the JAAP concerning the strategic gap should be changed to read:

No housing development will take place within the narrowest part of the Horsham/Crawley strategic gap.

- 10) The JAAP preferred option shows that a railway line will divide the proposed neighbourhood. The Horsham and Crawley core strategies require that any new development should be built on 'the neighbourhood' principal in keeping with the other neighbourhoods in Crawley, yet there are no other neighbourhoods in Crawley that are divided by such an obstacle.

Under these points the JAAP does not pass the tests of soundness numbered (i), (iv), (v) and (vii). Therefore, the relevant sections of the JAAP should be altered to read:

Under no circumstances will such obstacles as railway lines and major roads divide any new neighbourhood.

- 11) Public consultations and Sustainability Appraisals concerning the JAAP are fatally flawed as Crawley Council's stated position of 'No development on Ifield Golf Course' just prior to the publication and consultation of the JAAP has made the entire process a sham.
- 12) The council's assumption that replacement golfing facilities must be provided is now known to be incorrect.
- 13) Evidence suggests that development on Ifield Golf Course without relocation is the most economically viable and sustainable option as only a single bridge over the railway would be required with a full WRR, which in turn would alleviate future congestion and rat-running in the area.
- 14) New infrastructure associated with development of the Golf Course (and surrounding land) would also serve Ifield West. Development would also put an end to the current 'blighting' of homes due to the current uncertainties.

Considering these points the JAAP in its current form does not pass the tests of soundness numbered (ii), (iii), (vii) and (ix). To ensure the JAAP adheres to both Crawley and Horsham core strategies, local development policies and passes the tests of soundness, the relevant wording of the JAAP should be changed to:

Development of a new neighbourhood of 2,500 homes will take place on Ifield Golf Course and adjacent surrounding land, as development of this location is the most cost effective, sustainable and appropriate option in all cases.