

SUMMARY OF REPRESENTATIONS RECEIVED ON THE ISSUES AND OPTIONS JOINT AREA ACTION PLAN AND RESPONSES.

The responses have been analysed in the order in which they appeared in the document.

General comments on the contents of the Issues and Options document

A number of general representations commented upon the entire document. The general location of the Area of Study was considered, with respondents expressing concern that development may compromise the integrity of individual settlements, particularly the setting of Ifield Village. Concern was also expressed relating to impact on Strategic Gaps and the countryside. Some respondents expressed concern that local opposition to development may be 'brushed aside'. It was outlined that development should be of sufficiently high quality to minimise negative impacts upon the environment.

Other respondents were supportive of the strategic location, drawing attention to specific locations within the Area of Study, and elements of support were received for broad development locations west of Bewbush and west of Ifield. The Environment Agency drew attention to the lack of a Strategic Flood Risk Assessment. A need to take on board biodiversity and geological conservation principles was noted.

While both Councils acknowledge the concerns relating to the impact of development within the Area of Study, the principle of developing a new neighbourhood in this location was established through the West Sussex Structure Plan (2001). It is the role of the Joint Area Action Plan (JAAP) process to identify the most appropriate and sustainable location for the new neighbourhood within the Area of Study. Public participation will play a key role in this process, as set out in both Councils Statements of Community Involvement. Regular opportunities will be provided for public participation at each stage of the Joint Area Action Plan process, and representations received at the Issues and Options stage will play an important role in informing and identifying the preferred location for the development.

Issues relating to the absence of a Strategic Flood Risk Assessment are discussed in detail under Chapter 4 – Baseline Information and SA/SEA.

Chapter 1 – Setting the Scene

While some support for development within the Area of Study was noted, a number of responses questioned the general siting of this strategic location. It was considered that further work should be undertaken to assess the potential to locate the Area of Study elsewhere, with alternative locations closer to Horsham, south east of Crawley, and to the north of the region between Crawley and Horley, suggested.

The decision to designate West and North West of Crawley to accommodate a new neighbourhood stems from an original allocation made within the West Sussex Structure Plan 2001.

Attention was drawn to a need to consider future expansion requirements at Gatwick, and any subsequent impact this may have on development within the Area of Study. A number of representations expressed concern relating to the potential of development within the Area of Study to impact upon particular settlements, and emphasis was placed on stakeholders to acknowledge and address the constraints within the Area of Study. Particular attention was drawn to the role of careful master planning in ensuring deliverability and sustainable development during and beyond the plan period.

Consultation on the JAAP process was welcomed, though some respondents outlined that consultation events should be better publicised and more accessible.

At the Preferred Options stage, the Councils will seek to implement a more inclusive and better publicised consultation in order to ensure that a wide spectrum of the public, stakeholders and community groups are able to provide feedback.

Chapter 2 – Policy Context

It was considered essential that the Joint Area Action Plan (JAAP) provides a framework sufficiently flexible to facilitate growth west and north west of Crawley during and beyond the plan period, so as to accommodate any change in policy from the emerging South East Plan. A need for flexibility was considered especially important in light of uncertainty relating to the future expansion at Gatwick Airport, and some respondents outlined that it may be appropriate for the JAAP to maintain an either/or approach.

It was noted that the Draft South East Plan does not specifically outline that the strategic development should be located West and North West of Crawley, as the original allocation stems from the outgoing West Sussex Structure Plan. In light of this, some representations considered that the current strategic location should be re-evaluated, and sites to the east and south east of Crawley investigated.

While it is acknowledged that the current West Sussex Structure Plan will be largely superseded by the emerging South East Plan, the West Sussex Structure Plan is at present the adopted document guiding development in West Sussex. Whilst not specifically identified within the Draft South East Plan, housing figures from the outgoing West Sussex Structure Plan, including the provision of a new neighbourhood West and North West of Crawley, are encapsulated within the South East Plan figures. As such, both Councils consider the designation to be sound. Notwithstanding this, development pressures within the Gatwick sub-region remain strong, and will increase as a result of the Draft South East Plan. Therefore, it is acknowledged, that it may be necessary to investigate longer-term development to the east and south east of Crawley as part of Core Strategy review and cross-authority working.

The majority of representations were supportive of the Development Principles and Objectives outlined within Chapter 2, although a number of minor amendments were suggested. It was felt that the Strategic Gap between Horsham and Crawley should be maintained, and concerns were raised over any reduction in the Strategic Gap and consequent risk of coalescence between settlements. As such, respondents were supportive of the key objective to prevent the coalescence of Horsham and Crawley, though it was considered that a strengthening of relevant text may be appropriate.

Some concern related to the text of paragraph 2.11 regarding infrastructure provision, with respondents highlighting the importance of realistic funding being in place to guarantee that infrastructure objectives are met. A single representation considered that to set a target of 2500 dwellings may undermine the provision of sufficient infrastructure within the development, increasing pressure for housing at the expense of public amenity.

As part of the JAAP process, both Councils will be undertaking internal work streams and commissioning consultants in order to provide a robust evidence base to inform and identify the preferred location for development. As part of the consultants brief, both Councils will require a detailed assessment investigating the financial viability of providing a new neighbourhood accompanied by necessary infrastructure, services and facilities.

Chapter 3 – Joint Working and Area Action Plan

Responses drew attention to the role of the JAAP in identifying and explaining the range of issues which must be addressed. Comments of both support and concern were raised over the possible location of development at specific sites within the Area of Study. The principle and format of the consultation process was generally welcomed, though it was suggested that drop-in sessions should have been held at venues around the Borough, rather than solely in Crawley Civic Hall. Some concern was raised that people without access to the Internet would not be able to become fully involved with the consultation process.

Both Councils remain committed to the full involvement of the local community within the consultation process, as set out in the two Councils respective Statements of Community Involvement. Both Councils will endeavour to arrange exhibitions at a variety of accessible venues in order to ensure that as many residents as possible are able to become involved with the Preferred Options JAAP. While on-line consultation via the Internet represents a convenient means of commenting on the JAAP, it is recognised that not all residents will have access to a computer, and paper copies of all JAAP documents will continue to be available for comment.

Chapter 4 – Baseline Information and SA/SEA

Relatively few representations were received in relation to this chapter, with much of the focus centring upon minor wording omissions and suggested amendments to text. Some respondents expressed concern regarding the content of the Issues & Options document, outlining that it does not contain sufficient alternative options upon which the community's views will be sought.

Several responses related specifically to the JAAP Sustainability Appraisal and Strategic Environmental Assessment Scoping Report (SE/SEA). A key concern focussed on the need to consider the sustainability implications of any increase in transport related to future development, and it was suggested that the need to minimise increased traffic and

consider impact on air quality be included as an objective within the SA/SEA. The absence of a Strategic Flood Risk Assessment was noted.

The impact of development on the environment is central to the JAAP process, and will remain a key consideration when working towards a preferred location for development. The SE/SEA for the JAAP Issues and Options document sets out a range of key Sustainability Objectives and Sustainability Indicators to ensure that the new neighbourhood contributes to sustainable development principles. A number of these objectives make specific reference to impact on the environment, particularly the need to conserve and enhance biodiversity (Objective 5), maintain a high air quality environment (Objective 9), reduce the impact of noise on residents and the wider environment (Objective 10), and to reduce car journeys and promote sustainable transport methods (Objective 14).

A number of representations throughout the document have referred to the absence of a Strategic Flood Risk Assessment within the JAAP Issues and Options evidence base. Both Councils have recently appointed consultants to undertake a Strategic Flood Risk Assessment to assess flood risk within the Area of Study in order to fulfil the requirements of the newly adopted PPS25.

Chapter 5 – The Environment

Responses highlighted the opportunity presented within the Area of Study to plan for growth in green infrastructure and development. Some representations outlined that the JAAP should give greater recognition to the environmental issues at stake, and it was recognised that development should consider and mitigate for environmental designations. Several respondents endorsed the JAAP sentiment that environmental constraints should not necessarily prevent development, and could potentially enhance the surrounding environment if managed and accessed appropriately. Few comments related to individual Landscape Character Areas, though the descriptions of each Landscape Character Area as set out within the Joint Area Action Plan was broadly supported.

Both Councils are supportive of the need to protect, and where possible enhance the environment and landscape, and strongly believe that development requirements should be balanced against possible environmental impacts. It is considered that the Issues and Options document gives appropriate consideration to the environmental issues at stake at this particular stage of the JAAP process, and it should be noted that the JAAP will be guided by both national and regional guidance, which clearly sets out the need to protect environmental designations. Further consideration will be given to potential environmental impacts of development as part of the SA/SEA process, adding further weight to the evidence base which will guide the identification of a preferred option.

Impact of development upon the Strategic Gap again drew discussion. There was both support and opposition to any potential development of the landfill site, with some representations believing this may lead to a significant narrowing of the Gap. A single representation considered that developing the site south of the railway would potentially be contrary to the purposes of the revised Strategic Gap.

Government guidance requires local authorities to undertake reviews of local and strategic gaps, with the Horsham/Crawley strategic gap reviewed under the Horsham District Council Core Strategy. It is considered that to allocate an area for strategic gap within the Area of Study would not be appropriate at the present time, as to do so would pre-empt the work of the JAAP. As such the revised strategic gap does not fall within the Area of Study, and it will be the role of the JAAP to consider the need and appropriateness of defining strategic gap within the Area of Study once a preferred development location has been identified.

Representations were generally supportive of objectives to deliver an integrated and sustainable development with a positive interface and connections between the town and surrounding landscape. It was acknowledged that some areas of Crawley's urban boundary are at present abrupt and unsympathetic to adjoining countryside, and support was expressed for development that would provide a softer, more sympathetic transition between the urban fringe and surrounding rural area. Respondents supported the JAAP aspiration to protect and enhance opportunities for green infrastructure, though the potential for development to restrict access to countryside was a concern.

Concerns that the development of a new neighbourhood will restrict access to the countryside are noted, and once a preferred location has been identified, the JAAP will require development to ensure strong links are provided and maintained between the urban area and countryside through appropriate management and master planning.

Question Set 1

What do you think are the most important environmental or historic features in the Area of Study?

Representations were receptive to the need to consider those environmental and historic features located within the Area of Study. Attention was drawn to the hierarchy of environmental features, with a number of representations outlining that protection should first and foremost be given to National designations including Sites of Special Scientific Interest, Listed Buildings and Ancient Monuments. It was felt that National Designations were of greater importance than those of local status such as Sites of Nature Conservation Importance and Tree Preservation Orders. Attention was drawn to other features including ancient woodland, unimproved grassland, the hedgerow network, and areas where legally protected, scarce or rare species have been identified. Representations outlined that habitats and species would need robust buffering against the negative impacts of development. It was noted by some respondents that large parts of the study area are relatively free of major environmental or historic features, and those that are present would not necessarily constrain delivery of the development.

Strong support was expressed for the conservation of countryside west of Ifield, and the setting of Ifield Village Conservation Area. Specific attention was drawn to the conservation value of the area and adjoining archaeological site.. A network of ancient footpaths, and recently established permissive footpath along the River Mole were also considered important features for protection. The setting of the Scheduled Ancient Monument, Ifield Moat, was a key consideration in representations. Support was also received for the retention of Ifield Golf Course.

Attention was drawn to a number of additional environmental and historic features including the River Mole Floodplain and tributaries, areas of Strategic Gap, archaeological parkscape to the western edge of the study area, and Bewbush Moat Scheduled Ancient Monument. Representations outlined the need to avoid areas at risk of flooding.

It is clear that a number of historic and environmental features are located within the Area of Study. Both Councils are undertaking further internal work streams to assess biodiversity within the Area of Study, and appropriate weight will be attached to designations when identifying a preferred location for development. The strong support expressed for the conservation of countryside west of Ifield and the setting of the Ifield Village Conservation Area, is noted. The preservation of all areas of particular environmental quality will be a material consideration when identifying a preferred location for development.

What design features do you think could be used to 'blend' a new urban area into the existing urban area and surrounding countryside?

Representations supported the objective to effectively integrate new development with the existing urban area and surrounding countryside. Design and layout emerged as key factors, with respondents outlining a need for the urban extension to reflect traditional patterns of development, with lower residential densities appropriate where development meets the rural area. It was considered that the design and character of development should be of high quality, remaining sympathetic to the adjoining urban area. The need to promote strong physical links between the new development and adjoining rural and urban areas was outlined by several representations as an effective means of integrating development. In particular the creation of new, and the enhancement of existing access points to surrounding countryside, such as footpaths and bridleways, was strongly encouraged. Representations identified a need to incorporate green wedges and areas of open space into development.

The retention and enhancement of natural landscape features was considered a key factor in encouraging transition between urban and rural areas. Respondents outlined a need to avoid the loss of, or damage to, important habitats and sites, with representations suggesting that the introduction of buffer zones around ecologically valuable areas of land would enable their effective safeguarding. It was considered that a green infrastructure buffer may in some cases be an appropriate means of ensuring a gradual transition between the new urban fringe and rural area. As well as protecting existing biodiversity, it was considered that opportunities to enhance biodiversity should be integrated into design.

It is agreed that the design and layout of the new neighbourhood will be important considerations, particularly in the context of appropriately integrating development with the adjoining urban and rural area. The JAAP Issues & Options acknowledges that areas of Crawley's western boundary are currently abrupt, and the new neighbourhood will provide opportunities for a smoother transition at the urban/rural fringe, and it will be for the detailed master planning process to identify the most effective means of appropriately integrating new development.

How would public access and links to the countryside from the new development be improved from those that currently exist?

Many respondents supported steps to retain and improve existing links, highlighting the benefits of the green network. There was support for further enhancements interlinking existing routes with new corridors to provide a wider and more cohesive rights of way network. It was considered that a new rights of way network should be multi-modal in order to provide countryside access for user groups such as pedestrians and cyclists, with public access to the countryside available and accessible to all sectors of the community, including those with particular mobility requirements. Representations discussed the appearance of new routes into the countryside, with the retention of tree belts, hedging, maintenance of existing bridges, and provision of a natural feel to footpath surfaces considered important. A need to maintain and enhance the existing landscape setting of Ifield Village and Conservation Area was again emphasised.

It was noted that it may be appropriate to divert some footpaths in order to allow continued access, and a need for careful design and flexible master planning was emphasised. Some concern was expressed relating to the possible development of a relief road, which it was felt had the potential to restrict access to the countryside.

It is agreed that public access and links to the countryside will play an important role in the effective integration of the new neighbourhood with both the existing urban fringe and adjoining countryside. The new neighbourhood will provide significant opportunities to enhance existing green infrastructure and create new and sustainable access to the adjoining countryside. Once a preferred location for development has been identified, it will be the role of the detailed master planning process and design stage to identify how best public access to the adjoining countryside will be achieved.

Do you have any suggestions as to how the most important landscape features/character areas can be protected whilst accommodating development and what are the opportunities for protecting and enhancing the area?

Responses emphasised the need to protect the most important landscape features, and a number of suggestions were made as to how this might best be achieved. The appropriate siting of development emerged as a key consideration, with representations outlining the need to locate in areas with the greatest landscape capacity to accommodate development. A number of responses considered that the introduction of buffer zones may provide an effective means of protecting important features. A need to clearly define an area of Strategic Gap was again noted.

It was felt that an assessment should be made of each landscape feature in order to identify the likely impact of development, though a single response noted that important landscape character features to be protected had already been identified within the Urban Rural Fringe Study. It was considered that important landscape features could be identified, protected and enhanced through the master planning process, with the need for clear objectives and flexibility within this process outlined.

Some respondents drew particular attention to the area west of Ifield, and it was felt that to designate this area as a nature reserve would serve to protect the existing landscape and features. A single representation considered that should the area west of Ifield to be identified as suitable for housing, a high quality development could potentially enhance the area and protect it from further development. Other respondents echoed this

sentiment, believing that development could potentially improve and reinforce existing character areas through recreating habitats and landscape character.

There is a clear need to balance development requirements and the protection of important landscape features and character areas. The key landscape character areas as set out within the JAAP Issues and Options were identified within the Horsham District Landscape Character Assessment, and expanded upon within the Urban/Rural Fringe Study (2006). This document clearly sets out the key environmental constraints to be considered when identifying a preferred development location, and forms part of the evidence base being compiled to inform the JAAP.

Are there any particular characteristics about the current urban/rural edge that you feel should be retained or enhanced?

Responses focused upon the general appearance of the existing fringe, believing this to be too 'hard' in places, having become fragmented and unsympathetic to its rural context. The need to ensure a 'soft' landscape was emphasised, and it was suggested that rural character could be enhanced through new woodland and hedgerow planting, alongside the provision of green corridors to link the urban fringe and countryside. Impact on the setting of lfield remained a key concern.

The opportunities presented to provide for a smoother transition between the urban and rural fringe are acknowledged, and have previously been discussed in further detail earlier in this chapter.

What type of green/open spaces do you consider important for a community and how can these be integrated with the new development, the existing built-up areas of Crawley and the surrounding countryside?

Respondents considered that a variety of open space will be required in order to support the new neighbourhood, both within the development itself, and beyond the urban area. Suggested typologies included playing fields, children's play areas, informal areas for walking and landscaped amenity space. Responses outlined a need for open space to include land for the rural economy, such as farmland, and land suitable for wildlife such as Nature Reserves or Country Parks.

The appropriate integration of open space with the adjoining urban area was a key consideration, with respondents outlining that footpath, cycle and vehicular linkages will be required. Attention was drawn to the requirement to review existing open space provision (as per PPG17) in the vicinity of the Area of Study in order to correctly identify likely demand. The need for appropriate master planning was again emphasised.

Crawley Borough Council are in the process of appointing consultants to provide an assessment of open space within the borough as per Government requirements set out in PPG17. It is fully anticipated that this assessment will feed into on-going studies to identify the open space requirements for the new neighbourhood, ultimately feeding into the preferred options, and informing the detailed master planning process.

Chapter 6 – Housing Provision

Representations broadly supported both Councils desire to seek a provision of 40% affordable housing from the Strategic Development Location, and a large proportion of respondents considered it appropriate for the JAAP to provide a clear indication of the proportion of affordable housing required. Some representations considered that a 40% threshold could have a detrimental effect on development viability if applied inflexibly, and it was outlined that the incorporation of affordable housing will need to give regard to potentially high costs of delivering development. A single representation questioned the evidence base and methodology employed in the Housing Needs Survey and Affordable Housing Viability Studies, maintaining that a baseline of 40% affordable housing provision cannot be drawn from the studies.

Responses broadly supported the general approach of creating a mixed community, acknowledging that an appropriate mix of dwellings will be required in line with local demographics and household trends. A number of representations raised concern over any provision which would prescribe the exact breakdown of affordable housing type and tenure mix. As such, it was outlined that the JAAP should be sufficiently flexible to allow phases of development to remain receptive to the most up-to-date information in order to allow for future changes in the housing market. Particular attention was drawn to the approach of Circular 6/98, stressing that the only commitment should be to ensure that an appropriate mix of social rented and intermediate market housing is provided as part of the 40% affordable housing provision.

Both Councils recognise the high demand for housing within the sub-region, and are committed to ensuring that an appropriate proportion of this is affordable housing. It is considered that the provision of 40% affordable housing within the new neighbourhood has been fully justified within the Housing Needs Surveys of both authorities, and in the Affordable Housing Viability Study. As such, both Crawley Borough Council and Horsham District Council consider that a suitably robust evidence base is in place.

A joint Affordable Housing Position Statement is being prepared by Housing Officers from both Councils, setting out the principles to be followed by all stakeholders as part of the development. It is considered imperative that a long-term view is taken towards affordable housing provision, and the statement will focus on delivering a future proof for the mix of unit size, type and tenure. It is anticipated that the Position Statement will provide guidance on the percentage of affordable housing type, size and tenure to be sought. It should be emphasised that the intention is not to be overly prescriptive, but rather to ensure that an appropriate housing mix is considered from the early stages of master planning.

The principle of applying sustainable construction methods was broadly supported, with representations outlining a need for development to be environmentally friendly, promote water efficiency and renewable energy. Some responses considered that it may be achievable to apply a more stringent requirement than outlined in the Issues and Options paper, and support was received for the use of 10% on-site energy from renewable sources as a minimum target, alongside a minimum EcoHomes standard of 'very good', consideration of BREEAM standards, and good quality sources of heat and power provision eligible for Renewables Obligation Certificates. Notwithstanding support for the

utilisation of sustainable construction methods, a number of respondents expressed concern regarding how this may, in practice, be achieved in light of current technological constraints. As such, it was considered that an element of flexibility should be applied, both in the short and longer-term, and considered that the JAAP should not include prescriptive or restrictive text beyond general principles. Some respondents noted that the physical location of development close to sustainable transport links represents a realistic method of promoting sustainable development.

All development within the new neighbourhood will be required to satisfy the sustainable development and construction standards that will be outlined in the Submission JAAP. It is considered that the stance regarding sustainable construction methods set out within preferred options will largely be informed by statutory guidance in place at the time of drafting. In particular, consideration will be applied to the Sustainable Housing Code and BREEAM standards. Further guidance regarding sustainability will be set out within Supplementary Planning Documents currently being produced by both Councils.

Question Set 2

To what extent should the dwelling type and size to be provided be dictated?

Again the principle of seeking 40% affordable housing was broadly supported, and it was noted that the provision of guidance in relation to housing density may be beneficial. Limited support was received for an approach which provides for Horsham and Crawley to determine the overall type, size and mix of housing required in the area, as informed by the outcomes of local housing needs surveys. Notwithstanding this, several responses considered social rented targets being put forward to be too prescriptive, imposing an unacceptable level of control on the house building industry. Representations identified a need to apply flexibility in order to allow development to consider commercial and market forces as housing needs evolve over the plan period. As such, there was broad support for the JAAP recognition that housing mix will need to be evaluated over the lifetime of development. One response noted that the requirement to provide a mix of dwelling types within housing schemes is recognised within existing national, regional and local policies, and as such there is no specific need for the JAAP to dictate the size and type of new homes.

It is essential that guidance is provided as to the size, type and tenure of affordable housing to be sought within new development. The guidance set out in the Affordable Housing Position Statement is intended to be applied flexibly, and is in place to ensure that development provides an appropriate mix of affordable housing.

What do you perceive to be the dwelling type and size needs?

Respondents considered that development should ensure that the housing requirements of the whole community are met in order to provide for a balanced and successful neighbourhood. Despite agreement that this could best be achieved through providing a mix of different dwelling type and size, there was some discussion as to how the new development should relate to existing dwelling size and type in the Borough. The majority of representations were supportive of JAAP aspirations to explore the provision of dwelling size and types not currently coming forward through brownfield development.

Respondents perceived there to be particular need for a significant proportion of family houses, though also acknowledged a demand for smaller 1 and 2 bedroom properties. A single response noted that to attempt to address any Borough-wide imbalance of a given dwelling type (through providing the new neighbourhood with a disproportionate number of that dwelling type) would not make for a balanced community. Again, representations outlined a need to base the final mix of dwelling size and type on up-to-date information, and it was considered that the outcomes of housing needs surveys would play a key role in achieving this.

Demand for a good mix of dwelling type and size is noted, and feedback from the Issues and Options consultation will be considered when the drafting the Affordable Housing Position Statement. It is anticipated that the Position Statement will provide the necessary guidance to inform the JAAP, ensuring that an appropriate range of dwelling type, size, and tenure are provided within the new neighbourhood.

What type of affordable housing should be provided?

Relatively few responses were received in relation to the specific type of affordable housing to be provided. It was generally acknowledged that a mix of affordable housing type should be provided, and that consideration should be given to new initiatives that may emerge over time to improve affordability. Representations outlined that the mix between intermediate market housing and social rented should remain flexible.

Again, the type of affordable housing to be provided will be fully considered within the emerging Affordable Housing Position Statement, and translated into the Preferred Options JAAP.

Chapter 7 – Employment Provision

Respondents broadly supported JAAP aspirations to support any new neighbourhood with necessary commercial development, whilst exploring opportunities for strategic commercial provision. Some concern was raised as to whether there is sufficient demand to justify the designation of land for the delivery of further employment generating uses. Concern was also raised that the JAAP is suggesting a redistribution of employment floorspace between Horsham and Crawley, and that this may have ramifications for both Councils Core Strategies. Some respondents considered that it would be premature at this stage to identify a specific location for employment within the Area of Study. Attention was drawn to a need to employ flexible criteria enabling the consideration of alternative land uses should existing commercial use become unfeasible. Continued stakeholder consultation was supported.

Both Councils note the support expressed for the provision of appropriate employment floorspace within the neighbourhood, and exploration of further opportunities for strategic employment provision within the Area of Study. Ongoing studies to inform the JAAP evidence will assess the amount of employment floorspace required to serve the new neighbourhood, and investigate whether sufficient demand exists to justify the provision for an area of strategic employment provision. The JAAP is not suggesting that a redistribution of employment floorspace is required between Horsham and Crawley; the issue is, should a requirement for strategic employment be identified. It is considered

such provision would be intended to meet the wider needs of the Gatwick sub-region as a whole.

Question Set 3

Do you think land for employment use should be included in the neighbourhood?

Representations expressed clear support for the delivery of appropriate employment generating opportunities as part of a mixed-use neighbourhood. It was outlined that the provision of employment land will be central to a successful neighbourhood, both in terms of meeting resident's social and economic needs, and the promotion of sustainable development through reducing the need to travel long distances to work.

Both Councils note support for providing appropriate employment generating uses within the new neighbourhood. On-going studies will establish the precise level and type of employment to be provided within the new neighbourhood, and this will be reflected within the Preferred Options JAAP.

Should the development West and North West of Crawley deliver strategic employment provision or should development only accommodate the commercial floorspace required for a new neighbourhood?

Respondents welcomed the principle of providing localised commercial/employment floorspace to support the requirements of the emerging neighbourhood. It was noted that the provision of local level employment alone may be insufficient to sustain the new neighbourhood, and a number of representations supported the exploration of further opportunities within the Area of Study to accommodate strategic employment capable of serving the wider area. Respondents outlined that the delivery of strategic employment provision within the Area of Study would promote and strengthen the thriving economy of the Crawley/Gatwick sub region, according with both West Sussex Structure Plan requirements and the aspirations of the Gatwick Diamond Initiative. Notwithstanding this, some concern was raised that to allocate strategic level employment within the new development would relate poorly to the neighbourhood principle, possibly resulting in a segregated and sterile business park rather than a contained neighbourhood. It was noted that the scale of employment provision should be appropriate to proposed transport and other infrastructure within the Area of Study.

It is essential that sufficient employment opportunities are in place to support the new neighbourhood, and ensure that sustainability objectives are met. Both Councils acknowledge support for the exploration of further strategic employment opportunities, and on-going studies will identify whether such provision is required. Should a demand for strategic employment provision be identified, it is not anticipated that it would be appropriate to locate such provision within the neighbourhood itself, and on-going studies would consider appropriate alternate locations within the Area of Study.

Should any new strategic employment provision be accommodated within the new neighbourhood or provided in direct connection with the existing employment areas at Gatwick and Manor Royal?

Respondents were broadly supportive of locating a strategic employment allocation within the Area of Study. Some respondents noted that Crawley's neighbourhood principle has not traditionally included substantial amounts of employment land, increasing the need to travel to established centres at Gatwick Airport and Manor Royal. As such, minor support was expressed for the provision of strategic employment as part of, or attached to, the urban extension, making for a more sustainable neighbourhood. Notwithstanding this, concern was expressed that to locate strategic employment provision within or on the edge of the new neighbourhood may be inappropriate for a predominantly residential area, being better suited to areas with established employment generating use.

Strong support was expressed for directing new strategic employment development towards existing employment areas at Gatwick Airport and Manor Royal, with respondents emphasising the need to promote connectivity and interaction between sites. It was largely considered that land to the south of Gatwick Airport presented a significant locational opportunity for strategic employment, with representations citing the close proximity to existing and proposed employment allocations, and good transport links to the major road network. The potential to enhance existing public transport links between employment and residential areas was outlined. It was also noted that development in this area is constrained by the noise contours of Gatwick Airport, and a strategic employment use would possibly make for an effective use of land otherwise unsuitable for residential development. Some respondents considered the landfill site at Bewbush may offer scope for strategic employment, especially in light of potential remediation issues which may prevent residential development.

Should a requirement for strategic employment provision be identified, it is anticipated that an appropriate location will be identified through the JAAP process. While the Area of Study covers the area north of Langley Green, and potential may exist to provide a strategic employment location in this area, the land is subject to Gatwick Safeguarding. Any strategic employment allocation within this area would be subject to the physical land take of Safeguarding, and a definitive decision regarding the provision of a second runway. As such, use of this area, is likely to remain part of a longer-term approach.

What type of employment do you think is needed?

Representations drew a clear distinction between the type of employment provision required at neighbourhood level, and a wider strategic employment requirement. There was a clear perception that neighbourhood employment provision should cater predominantly for local employment need, giving appropriate regard to the amenity of the surrounding residential area. As such, small scale retail and service uses were particularly encouraged, complemented by low-intensity business/service units including small office suites, live/work units and high quality start-up micro business units.

On-going studies will examine the appropriate type and scale of employment generating uses for the new neighbourhood. Although retail uses will be required to meet the needs of the neighbourhood, and it is acknowledged that this use will provide a source of employment for residents, it should be noted that retail traditionally falls outside the B (employment) use classes. As such, retail uses

would not be considered as contributing towards the employment floorspace requirement for the new neighbourhood.

Representations outlined that strategic employment should diversify and build upon Crawley's current economy, reinforcing its position as a sub-regional employment hub. It was considered that strategic employment provision should meet the specific employment requirements of the sub-region, and clear demand was expressed for accessible, high quality, high density commercial development able to attract knowledge-based industries into the area. It was noted that the provision of good public transport facilities will be crucial to the delivery of high value strategic employment sites. A single respondent outlined that it will be necessary to determine appropriate levels of commercial floorspace for development.

Should a requirement for strategic employment provision be identified, it will be imperative to ensure that provision continues to support the wider requirements of the sub-region. On-going studies will inform the Preferred Options JAAP regarding the precise size and type of provision, if regarded necessary.

Chapter 8 – The Neighbourhood

Respondents were generally supportive of the neighbourhood principle and promotion of sustainable development, considering this to be the most appropriate form for the urban extension to take. Attention was drawn to previous development at Ifield West, with representations drawing attention to a lack of sufficient community infrastructure and local services. It was suggested that a new neighbourhood development may provide the opportunity to make good these deficiencies. In contrast, a significant number of representations expressed concern that development located west of Ifield would be inappropriate.

Some concern was raised that despite a good network of footpaths between existing neighbourhoods and the countryside, there is currently an insufficient provision of bridleways and cycle access. It was outlined that development should encourage the promotion of new and existing links in order to create a safe network for all users.

Question Set 4

Do you agree that the neighbourhood principle is the appropriate format to be planning for an urban extension on the western side of Crawley?

There was wide-ranging support for the continuation of the existing neighbourhood principle, especially in light of the principle's accurate reflection of national sustainability objectives. Sustainability emerged as a key reason behind this support, and many representations outlined the importance of providing residents with an appropriate mix of accessible local facilities and services. While the continuation of the neighbourhood principle was broadly supported, some respondents considered that it may be necessary to adapt elements of the principle in order to remain appropriate and relevant. A requirement for greater flexibility to respond to changing needs was identified, as was a desire to increasingly promote self sustainability within neighbourhoods in order to reduce the need to travel by private car. It was considered that this may be achievable

through a provision of higher residential densities, and greater range of facilities and employment uses than found within Crawley's existing neighbourhoods.

Some respondents expressed concern that an individual neighbourhood of 2,500 homes may not be deliverable on a single site, and support was received for a provision of two smaller neighbourhoods. Representations considered that this approach would prove equally capable of providing the necessary range of facilities, whilst allowing for greater flexibility within the masterplanning process to consider development needs post-2018. Representations suggested potential locations for development, with west of Bewbush receiving strong support.

As set out within the Core Strategies of both Councils, it is considered that the neighbourhood principle remains the most appropriate format on which to plan the development. It is, however, acknowledged that it may be necessary to adapt elements of the principle to ensure it remains relevant and continues to provide future residents with an appropriate range of services and facilities in the current context. Both Councils note that elements of support have been received for the provision of two smaller neighbourhoods, though to apply this approach would not be in-keeping with the neighbourhood principle's requirement for sustainable and comprehensive development.

What are the key requirements/features that are most important to you as a community within a residential area?

Regardless of new neighbourhood format, it was considered essential that any urban extension should provide appropriate services and facilities to meet the daily needs of future residents and employees. Demand was identified for educational facilities, particularly primary school provision. Representations also identified demand for community facilities, places of worship to cater for a variety of religious faiths, and appropriate levels of local retail. A general requirement for a pleasing environment with appropriate landscaping was noted. Representations considered that all neighbourhood facilities should be easily accessible, with higher order services beyond the neighbourhood accessible via appropriate public transport provision.

It is imperative that sufficient services and facilities are in place to meet the daily needs of future residents. The Preferred Options JAAP will be informed by on-going studies being undertaken to identify the appropriate type and size of facilities and services required to serve the new neighbourhood. It is anticipated that these studies will explore opportunities for the new neighbourhood to provide additional services and facilities which could possibly meet identified deficiencies in the existing western neighbourhoods of Bewbush, Gossops Green, Ifield, and Langley Green .

What services and facilities do you think should be included in the new neighbourhood?

It was considered that facilities within the new neighbourhood should reflect the needs of residents and workers. Responses noted that much will depend upon the extent to which the new neighbourhood integrates with existing neighbourhoods; if highly integrated, it may be appropriate to complement the existing provision of adjoining neighbourhoods, with a more 'self-contained' neighbourhood requiring a more extensive range of facilities.

Representations outlined demand for a number of service and facility typologies including employment, primary healthcare, a community centre, a primary school, places of worship, and casual recreation space. It was considered that sufficient retail floorspace will be required to provide for everyday shopping needs, though concern was expressed that an over-supply of retail provision could potentially exert a negative impact on the shopping function of adjoining neighbourhood centres.

It is imperative that sufficient services and facilities are in place to meet the daily needs of future residents. The Preferred Options JAAP will be informed by on-going studies being undertaken to identify the appropriate type and size of facilities and services required to serve the new neighbourhood. It is anticipated that these studies will explore opportunities for the new neighbourhood to provide additional services and facilities which could possibly meet identified deficiencies in the existing western neighbourhoods of Bewbush, Gossops Green, Ifield, and Langley Green .

Chapter 9 – Transport and Highway Infrastructure

A number of responses were received in relation to transport and highway infrastructure issues, with many representations focusing upon the potential impact of development on the surrounding area. Concern was expressed that development would significantly increase traffic volumes and problems of congestion within and at the edges of Crawley's western neighbourhoods. Aside from potentially compounding existing areas of congestion, responses considered that development may create new problems through 'rat-running' as traffic looks to avoid main routes during peak times.

Representations outlined that improvements to the major road network will be necessary in order to accommodate increased traffic demands, and consideration within the JAAP relating to the possible construction of a relief road received a range of responses. The viability of development without a relief road was questioned, and limited support was expressed for potential relief road construction. Some representations outlined that such infrastructure provision would also serve to keep traffic away from rural areas.

Notwithstanding this, significant opposition was received regarding potential relief road construction, with concern expressed as to possible impacts upon the surrounding environment. Several representations outlined that such infrastructure would result in a loss of natural landscape and features, while others raised concern that any relief road could potentially contribute to future development pressure. An individual respondent questioned the necessity for a relief road, outlining that adequate permeability and capacity already exists through the adjoining neighbourhoods for a range of transport modes. In light of this, it was considered that a link to the A23, supported by an extension to the Fastway system may be a viable alternative to a relief road. It was considered that the design principles of any potential relief road should incorporate underpasses, bridges and crossings to allow access to the countryside for pedestrians, equestrians and cyclists, whilst also giving regard to retention of features of ecological or conservational interest.

Respondents drew attention to a spectrum of studies currently being undertaken to assess the transport implications of development within the Area of Study, and it was noted that these are likely to play a key role in informing the Preferred Options JAAP. It was outlined that the Highways Agency did not object to the principle of development within the Area of Study, subject to further transport assessment work.

Relief road viability was identified as an important consideration, with a single representation outlining that the proposed development of 2,000-2,500 houses and infrastructure would be unable to support the cost of road construction. Some respondents considered it appropriate that all significant developments within the Gatwick sub region contribute towards highways and transport requirements. Effective joint working between the Highways Authority, Local Authorities and West Sussex County Council was considered to be central to this process.

Large scale development of this nature will inevitably create additional traffic, and it is essential that appropriate highway and sustainable transport infrastructure is in place to meet the needs of the new development. As such, the JAAP process will take a pro-active approach to dealing with increased traffic levels, through giving appropriate consideration to assessing the impact of development on the existing road network, and maximising opportunities for sustainable transport measures.

On-going studies will assess the likely impact of the new neighbourhood on the current road network, recommending appropriate solutions to service and access a development of a neighbourhood scale in a preferred option location. Crawley Borough Council and Horsham District Council have jointly commissioned consultants to provide an independent review of existing transport studies and assessments, while further work will be undertaken internally as part of the on-going SA/SEA process. It is anticipated that all studies will be completed in sufficient time to provide a suitably robust evidence base to inform the Preferred Options JAAP.

Many responses considered that the JAAP should reflect guidance encouraging a shift away from car use, with many representations supportive of measures encouraging a full range of more sustainable transport modes. Both footpath and cycle path provision were considered important to new development. Respondents considered that a good network of footpaths exists to the west of Ifield, though noted that this only serves walkers. As such, support was expressed for the enhancement of the bridal way network to cater for equestrian access needs. The provision of good quality cycle access to Gatwick Airport, Manor Royal, and the Town Centre to serve any new employment allocation was considered an important aspect of new development. An individual response noted that while footpaths and cycle routes make for a good planning policy approach, such provision is unlikely to reduce the dependence of cars. One representation considered that development west of Ifield would be likely to adversely impact upon existing public rights of way, and it was considered that development west of Bewbush may provide an opportunity to deliver an extensive new public access network.

Bus and Fastway services were generally considered to be effective, though it was noted that Bewbush is currently better served than Ifield. Representations outlined that opportunities to extend Fastway services to new development should be explored fully,

with a single respondent suggesting that development at Holmbush may provide a viable opportunity to achieve this.

Accessibility to the rail network was considered important in terms of promoting sustainable development. Respondents supported JAAP aspirations to explore the provision of a new or improved railway station, though an element of caution was noted regarding how this may, in practice, be achieved. It was noted that improvements to stations at Faygate or Ifield would be required, potentially including platform extensions and improvements to disabled access. A single response questioned whether Ifield Station could be suitably upgraded to meet increased demand, considering that it would be located too great a distance from new development to be sustainable. It was noted that any station improvements or new station provision would require considerable investigation, and representations stressed that where improvements are required, developer contributions should be sought. A single response considered that were the number of rail passengers using trains to rise, an increased train service capacity will be required.

The implementation of sustainable transport measures will play a key role in easing traffic congestion and reducing the environmental impacts of the new neighbourhood. Maximising opportunities for the implementation of sustainable transport is a key objective of the JAAP process, and on-going transport studies and assessments will consider the appropriateness of potential locations within the Area of Study to take advantage of a full range of sustainable transport measures. that the transport studies and assessments will fully explore opportunities to extend Fastway, and investigate the feasibility of improving the current rail network. The JAAP process will also investigate opportunities for the creation and enhancement of footpaths and cycle ways, and explore opportunities to implement Park & Ride.

Question Set 5

When and where do you think the worst traffic congestion occurs in the western neighbourhoods of Crawley?

Major roads into/out of Crawley were considered to be especially prone to congestion, with a number of responses drawing attention to rush hour queues and delays on the A23, A264, and A2220. Ifield was identified as experiencing peak time congestion, with particular attention drawn to several of the junctions adjoining the A23 from Ifield, in particular Ifield Avenue. Areas of congestion were also identified at the Bonnetts Lane/Airport Road junction, Cheals roundabout, and close to schools. Further afield, attention was drawn to significant Crawley/Gatwick bound rural traffic flows within the Mole Valley.

A single response commented that this particular question was not in-keeping with current policy aspirations to achieve a modal shift from car to more sustainable forms of transport. It was suggested that further multi-modal modelling work currently being undertaken will provide a better understanding of issues relating to the local area. Some discussion related to the possible construction of a relief road, and it was noted that evidence should be provided to demonstrate the impact of any new road on existing traffic flows.

On-going transport studies and assessments will assess the potential impact of development on the existing road network. Appropriate consideration will also be applied to the potential implications for the existing road network if a relief road is required. Again, the findings of these studies will duly feed into and inform Preferred Options.

How effective are existing public transport services in the area?

Responses generally considered existing public transport services in the area to be effective. Bus services are considered to be especially well-used and an efficient transport mode, with several respondents praising frequency of service and variety of routes. In particular, the Fastway route was identified as a success, though it was noted that Ifield is not served by this route at present. Respondents noted that significant new capacity will be required in order to serve the Strategic Development Location, and it was considered that Fastway could potentially be expanded to accommodate future demand. A single response related to rail, considering train services to be reasonably efficient. It was outlined that public transport routes should be accessible on all levels, and well integrated with cycle and walking routes.

It is encouraging that modes of public transport are well used and considered to be effective. It is important that the success of existing sustainable transport measures is encapsulated within the planning of the new neighbourhood, and on-going transport studies and assessments explore opportunities to enhance existing sustainable transport measures to appropriately service the development.

What are the opportunities to provide for sustainable transport provision?

The importance of good quality public transport links was emphasised, and it was stated that greenfield development of this nature offers a significant opportunity to design in a sustainable approach to transportation. Representations considered the western neighbourhoods to be well served by both regular bus services and Fastway, and it was outlined that opportunities exist to build upon the success of existing services, especially through the extension of Fastway routes.

It was considered that the potential for an additional railway station to serve the new development should be explored, though respondents acknowledged that the close proximity of Ifield and Faygate stations may act as constraints. It was suggested that the use of existing stations may be encouraged through improving public access via a high quality bus service, and improved cycle parking, while the possibility of working with partners to increase service frequency was raised. A need to maintain and enhance existing public rights of way was noted, including new provision for both pedestrians and cyclists. A single response considered that Park and Ride schemes do not decrease car use and are not a sustainable option.

Responses outlined that it may be appropriate to consider additional measures which could encourage more sustainable transport modes, such as restricted road access to cars, and traffic calming measures to reduce speeds. The requirement for a green travel plan with new development proposals was supported.

It was noted that any development pressure post 2018 may be a factor in whether a relief road is required. It was considered that the construction of a relief road would only be appropriate if justified fully via a robust evidence base, and once the use of sustainable transport modes has been considered fully. Again, land west of Bewbush was identified as potentially benefiting from good transport links.

It is encouraging that modes of public transport are well used and considered to be effective. It is important that the success of these sustainable transport measures is encapsulated within the planning of the new neighbourhood, and on-going transport studies and assessments explore opportunities to incorporate a range of sustainable transport modes into the development. In particular, studies will explore opportunities to extend the existing Fastway network, the potential facilitation of Park & Ride, possible provision of a new railway station.

What are the advantages and disadvantages of building a relief road in conjunction with the development?

A number of representations expressed support for the construction of a relief road, considering such infrastructure provision to be necessary in providing the additional network capacity required to cater for development. While some respondents considered that any relief road should principally cater for the new development, a number of representations identified an opportunity to improve the existing strategic road network around Crawley. It was considered that a relief road could relieve current congestion levels, reduce 'rat-running' through rural areas, and promote better access to Gatwick Airport, employment areas, and the Town Centre. Several responses considered that a new relief road would provide a significant opportunity to promote sustainability through the provision of high quality public transport, specifically an extension to the existing Fastway service. A single representation outlined that a relief road located at the edge of development could provide a defensible boundary against future development.

Notwithstanding this, several representations expressed concern regarding the potential impacts of a relief road. There was a clear perception that rather than reducing existing traffic problems, the construction of a relief road would serve to encourage car travel, generating further traffic and resulting in an increased use of the road network. Should the relief road provide access to Gatwick Airport, it was largely considered that further traffic generation would result from increased numbers of airport staff and passengers travelling to Gatwick by car. Potential environmental impacts of an increase in traffic generation emerged as a key concern, with many respondents highlighting that a significant increase in harmful emissions is likely. It was considered that a relief road to Gatwick Airport, which is itself increasingly seen as a major contributor to climate change, could potentially lead to public protests.

In addition to an increase in greenhouse gas emissions, impact of a relief road on surrounding area emerged as a key concern. In particular, representations related to likely negative impacts upon the landscape and character of adjoining countryside, and potential impact upon agriculture and environmentally sensitive areas. A single respondent drew attention to the conclusions of the Urban Rural Fringe Study, which outlined that any relief road could be highly damaging in landscape terms. Disruption to public rights of way and links between rural and urban areas was also raised as a concern, and it was considered that steps should be included within any relief road

proposal to ensure that barriers to the ecological network are avoided, and designated sites and important habitats are protected.

Some respondents considered that a development location west of Ifield would be more likely to require the construction of a relief road, potentially encroaching on ancient woodlands and countryside. It was noted that development west of Bewbush has links to the major road network and may not require major infrastructure provision. A single representation drew attention to a number of studies currently being undertaken considering the need for a relief road to serve new development, and whether any particular advantages would arise from the provision of such a road. Some additional concern related to likely cost implications of developing a relief road.

On-going transport studies and assessments will be material in assessing transport implications related to the development. Respondents have put forward a number of suggestions as to the most appropriate locations for development in light of likely transport infrastructure requirements. It will be the role of the JAAP to consider fully the emerging evidence base to ensure that development is suitably located so as to ensure that traffic implications are appropriately managed. In the event that a requirement for relief road is identified, it will be for the JAAP to ensure that any negative impacts are, to as great an extent as possible, mitigated for and appropriately managed.

What do you perceive to be the key issues and constraints to the delivery of any such relief road?

Clear concern emerged relating to the environmental impacts of any potential relief road, during both construction and operational phases. Several responses drew attention to a number of recent nationwide road improvement and relief road schemes, outlining that these have merely served to increase road usage rather than alleviate problems of congestion. As such, concern was raised that a relief road would be likely to attract traffic from a far wider area (especially if linked to Gatwick Airport), resulting in an increase in road usage, traffic levels, and harmful emissions. A single response expressed concern that the construction of a relief road west of Ifield would be likely to significantly impact upon Ifield Conservation Area.

Responses expressed concern over the financial viability of relief road construction, underlining that a substantial construction cost may have implications on development viability. It was considered a definitive commitment to the construction of a road should be made at the earliest opportunity, and responses underlined that in order to maintain financial viability, development will need to be of a sufficient quantum to facilitate the delivery of the road. An individual respondent considered that a financially unviable relief road could possibly be at the expense of affordable housing provision, and it was noted that the financial viability of such infrastructure construction would need to be thoroughly tested. Respondents outlined that a project of this scale would not be viable to fund solely through developer contributions, and would require a significant investment of public funds. It was noted that were development to proceed on a phased basis, each phase of development should bear its proportionate share of the cost of providing the road so that no one phase or future phase is burdened unfairly.

In the event that a relief road is required, several representations considered that the JAAP should include a commitment that both Councils will use Compulsory Purchase Powers to acquire the necessary land for delivery, giving appropriate consideration to any potential timescale implications. An individual representation considered that the possibility of an Article 14 veto preventing development within the Gatwick Safeguarded Area may act as a constraint on development. Given possible constraints on construction of a relief road, it was outlined as essential to consider at an early stage how the various development options could be undertaken without all, or part of it. Concerns were raised over the potential construction of development and/or a relief road west of Ifield, with attention once more drawn to potential infrastructure opportunities west of Bewbush. A need for appropriate master planning was outlined.

Should a requirement for a relief road be identified, it is acknowledged that its construction and usage is likely to have a significant impact upon the surrounding environment. Both Councils are aware that areas of particular environmental quality exist within the Area of Study, and it will be the role of the JAAP process to identify an appropriate location for development so as to ensure that any impacts are, to as great an extent as possible mitigated.

Both Councils note concern regarding the financial viability of development in the event that a relief road is required. Development viability is an integral part of the JAAP process, and on-going studies are being undertaken to ensure that development of the new neighbourhood is viable, taking account of all the services, facilities and infrastructure required to service the development. It should be noted that at this stage, the Councils' policy is for the JAAP process to establish the appropriate level and provision of services, facilities and infrastructure.

Chapter 10 – Utilities and Infrastructure Position

Respondents set out a range of utilities and infrastructure provision considered essential to development; highways and transport, schools, extra police, fire service, water services, sewage treatment, and public transport requirements to be in place before development commences. An individual response considered that a financial viability report will be important, expressing concern that with much of the cost of providing infrastructure unknown, the provision of 40% affordable housing within the development may be unviable. Concern was expressed that while general reference is made to water provision and sewage disposal requirements, no indication is provided as to how these issues will be addressed.

On-going studies are being undertaken to ensure that development is viable, and will inform the preferred options. The provision of 40% affordable housing within the new neighbourhood has been fully justified by the Councils existing studies and on-going studies regarding development viability. Further detail on issues of water and sewage treatment is provided later in the chapter.

Clarification was sought regarding the position relating to the possible closure of Crawley Hospital. A representation from the West Sussex Primary Care Trust (PCT) outlined that in terms of health care provision the PCT would be looking to provide a Primary Care Centre with 4 GPs and associated supporting services and staff. West Sussex PCT

anticipate that a Section 106 agreement should be sought, whereby any developer would be obliged to provide land and buildings free of charge to health services with the PCT paying the operational lease and running costs. It was noted that West Sussex PCT would require timescales for development to be provided in advance in order to allow sufficient time to tender for the provision of General Medical Services, and emphasised a desire to become involved with discussions relating to healthcare development.

The Environment Agency (EA) outlined that new development will create pressures on both surface and ground water quality and sewerage infrastructure, currently operating at maximum capacity. The EA confirmed that Thames Water will need to upgrade existing Sewage Treatment Works in order to meet future demand, though noted that the implementation process could take up to 10 years. It was considered that developers should work with water companies to ensure that housing numbers can be accommodated without negatively impacting upon water quality and the wider environment. The EA also considered that it may be necessary for sewerage undertakers to invest in new technologies to meet chemical standards for groundwater protection.

Sufficient capacity exists at the current sewage treatment works to accommodate development in the short to medium term. Thames Water have indicated that it would be possible to upgrade the existing treatment works and provide new capacity, in the longer term through their Asset Management Plan 5. The Councils will continue to work with Thames Water throughout the formulation of AMP5.

West Sussex County Council submitted representations outlining a variety of infrastructure requirements which may be appropriate as part of the strategic development. These included extra care and affordable housing for learning disability clients, education, youth services, and new neighbourhood library provision. West Sussex County Council noted that major changes are proposed for the Fire and Rescue Service in the north of the county, with new stations planned in Crawley and Horsham. Development within the Area of Study will be served by the replacement fire station at Cheals Roundabout, Crawley, and it was confirmed that development within the provision area serviced by the new stations would be required to proportionately contribute towards the cost of meeting these demands. It was indicated that additional household waste recycling may be necessary to meet the needs of development, with index-linked developer contributions sought.

Stakeholders raised a number of specific issues potentially impacting upon the location and deliverability of development. Concern was expressed that the landfill site west of Bewbush will require several years of monitoring before the Environment Agency consider surrendering the waste management licence. Given the possibility of land remediation works, serious concern was raised regarding scheme deliverability.

Several representations have expressed concern over the potential of the landfill site to come forward for development. On-going studies will assess the suitability of this location for development, setting out an appropriate remediation management timetable. It is fully anticipated that studies will be completed within a sufficient timescale to inform the Preferred Option.

Flood risk was considered an important factor, with a respondent noting that large scale building west of Crawley would exponentially exacerbate such risk. Attention was drawn to the many copses and wooded areas within the Area of Study, and it was outlined that these areas are vital to preventing flooding on a large scale. A single representation outlined that reference should be made to protecting the setting of Rusper Village.

Both Councils strongly believe that the requirements of PPG25, the adopted guidance at the time of writing, have been considered in informing the JAAP Issues and Options document, and when assessing flood risk through the SA/SEA process (Objective 7). Work is currently being undertaken on an Area of Study SFRA to assess flood risk within the Area of Study, and this will duly inform the Preferred Options JAAP.

Position Statement Summaries

Representations were received relating to a number of the Position Statement Summaries set out in the Issues and Options document. No responses were received in relation to Position Statement Summaries for The Countryside Agency, Sussex Police, or West Sussex County Council.

The Position Statement summaries set out below convey the stance of selected stakeholders. The Councils will be contacting appropriate stakeholders prior to commencing preferred options drafting, and revised positions will be reflected in the Preferred Options JAAP. It is anticipated that statements will be regularly updated throughout the JAAP process in order to fully reflect the most up-to-date position of stakeholders.

BAA Gatwick

Representations expressed concern over a perceived lack of clarity relating to future expansion at Gatwick Airport, and BAA Gatwick's position relating to safeguarding. Concern was expressed that any potential relief road route could conflict with the Gatwick Safeguarded Area, possibly requiring expensive diversion should a second runway be approved, and noted that any relief road construction could be subject to an Article 14 Direction preventing development. It was considered essential that the JAAP provides certainty over BAA Gatwick's stance to development within the Safeguarding Area.

East Sussex County Council

A single response expressed uncertainty over the desire of East Sussex County Council to see strategic gap boundaries determined at the same time, or after, development. It was noted that further explanation would be helpful.

EDF Energy

A single representation sought clarification regarding the cost implications of providing the additional infrastructure required to serve development. The representation also enquired as to what development criteria have been provided to EDF to allow an assessment to be made of the capacity required.

English Nature (Natural England)

English Nature would consider development west of Ifield a more sustainable option than west of Bewbush, should a high level of road infrastructure be required at Bewbush. While this stance was supported by an individual representation, another respondent highlighted that development located to the south of the railway line could be provided with direct access to the A264, with development west of Ifield likely to require a link to the north through Langley Green from the A23.

The Environment Agency

Concern was expressed as to the deliverability of development given Environment Agency doubts over the short-term viability of the landfill site, and this was potentially seen as a major constraint to development west of Bewbush. Environment Agency aspirations to reduce flood risk in new development were supported, and it was recommended that a Strategic Flood Risk Assessment be carried out.

Government Office for the South East (GoSE)

Support was expressed for GoSE's requirement that development needs are fully met, and it was considered essential that the JAAP provides flexibility to accommodate future growth, especially in light of a potential increase in housing requirement at the regional level. One respondent drew attention to GoSE's requirement to see a housing trajectory and timetable for delivery prior to the Horsham District Council Core Strategy Examination, questioning whether GoSE recognise that West of Crawley housing numbers are not exclusively for Horsham to replace in the Sub Region should lack of deliverability become an issue. Some concern was expressed that the wording of the final sentence was sufficiently strong; not going far enough to ensure the strategic gap is maintained.

High Weald AONB Unit

Some support was expressed for the High Weald AONB Position Statement, and it was considered essential that the height and form of buildings blends in with surroundings. Another representation expressed concern relating to the High Weald AONB position regarding the protection of the AONB setting, stating that existing boundary designations already include a transitional zone for their own protection.

The Highways Agency

A respondent considered there to be inconsistencies between the Highways Agency Position Statement and their stance at the Horsham District Council Core Strategy Examination, where it was outlined that there were no 'showstoppers' to development. Concern was expressed that the Highway Authority requirement for development to undertake a Transport Impact Assessment (including Travel Plan for all development likely to impact upon the trunk road), and a holding objection to development in the absence of a Traffic Assessment, represented inconsistency.

Network Rail

Network Rail echoed their Position Statement stance that development within the Area of Study could potentially have implications on the railway and associated infrastructure. It was noted that no conclusion has yet been reached on this matter, and outlined that this could potentially impact upon development viability.

Southern Water

Southern Water outlined that a twin track approach would need to be adopted to meet additional demand for water through demand management in parallel with the development of additional water resources. It was noted that new development provides an opportunity to incorporate measures to achieve high levels of water efficiency into their design, and considered that a policy to achieve specific standards should be included within the detailed stages of the JAAP. Some concern was expressed relating to the Position Statement's assertion that Southern Water may require investment if water capacity is insufficient to meet new demand, questioning where this investment would be sourced from. One respondent outlined that, in light of water restrictions presently in place, there must be a condition that no development takes place until sufficient capacity is in place to meet increased water demand.

Sport England

Sport England welcomed the acknowledgement of their Position Statement, and outlined that this continues to reflect their position. Attention was drawn to Sport England's recent work on incorporating recreation and activity provision into the masterplanning process.

Thames Water

Thames Water considered the Position Statement Summary to be largely reflective of their current stance, though outlined that land ownership is not the only constraint to the expansion of Crawley Sewage Treatment Works (STW). It was outlined that the existing STW discharges treated effluent into the relatively small Gatwick Stream, where available river water dilution is limited and where existing consents are especially stringent. It was noted that a major extension to the STW would significantly increase the volume of effluent discharged, requiring a more stringent consent from the Environment Agency to prevent a deterioration of river quality. Thames Water consider it important that their Position Statement makes reference to the funding of sewerage infrastructure that does not tie up with LDF timeframes, and noted that more details on the scale and location of development will be required if they are to apply to OFWAT to fund the necessary infrastructure before their business plan submission in 2007/2008. Another representation noted that the lead-in time for infrastructure will be up to five years, with processes to implement new treatment works taking up to 10 years. It was considered that these lead-in times may prejudice deliverability. It was also outlined that Thames Water will need to undertake a feasibility study.

West Sussex County Council Transport

The West Sussex County Council Position Statement relays their consideration of the merits of development within the Area of Study, provided that infrastructure requirements

are met. A single representation noted that while no definite assurances are given regarding the principle of the development from a transport perspective, the County Council is advancing in their considerations of the relief road even in the absence of a Traffic Assessment.

Question Set 6

In your view, have we identified all the right constraints and requirements at this stage?

It was generally considered that the Issues and Options paper has identified the likely constraints at this stage, though acknowledged that further work will be necessary to assess the relative significance of these constraints, and how these are to be balanced against development requirements. A single representation considered the evidence base in the Issues and Options document to be deficient, in terms of the need to await the outcome of on-going studies.

Representations outlined that the JAAP should give full consideration to all constraints related to a possible second runway at Gatwick Airport, and considered it crucial that robust principles are set out to protect the safeguarded area from inappropriate development. It was noted that while the 60dbA Leq and Gatwick safeguarding is currently considered a constraint to development, it is likely to become clear during the plan period whether a second runway is to be constructed. A need for the JAAP process to give consideration to this and allow for sufficient flexibility to deal with such a change in circumstance was identified.

The Environment Agency outlined that Surface Water Quality Maintenance of river water quality could be a constraint to growth, though considered that this can be removed by engineering solutions where appropriate. Responses also outlined that further consideration should be given to the disposal of surface water, and the provision of sustainable transport infrastructure. It was noted that the environment should be seen as an asset to development rather than a constraint.

While further studies and work are currently being undertaken, and the compilation of a robust evidence base remains on-going, it should be noted that a comprehensive evidence base is not a formal requirement at the Issues and Options stage. The Issues and Options document is intended to act as a forum for discussion, highlighting the key considerations and implications facing development within the Area of Study, and it is for the Preferred Options JAAP to present the preferred location for development founded upon an enhanced evidence base.

The constraints related to a possible second runway at Gatwick Airport have been considered fully within the Crawley Borough Council Submission Core Strategy. Policy G2 sets out clearly the desire to ensure that safeguarded land remains protected from development which would conflict with the construction of an additional runway and associated facilities. The policy acknowledges that the safeguarded area may be subject to review, and it is considered that sufficient flexibility is in place to consider any change in circumstances.

In light of the responses received to date, are there specific areas or issues that we should give priority to in order to bring the JAAP through to the next stage?

The Environment Agency conclusion that it may be several years before the waste management licence at the landfill site can be removed raised concern among stakeholders. Several representations considered that uncertainty over the short-medium term availability of this site could impact upon the phasing of development within the plan period, leading to doubts over scheme deliverability. Some representations outlined that it may be more appropriate to consider the landfill site for strategic employment, with other sites north of the landfill more suitable for residential development, while another respondent outlined that the landfill should be removed from the Area of Study. It was noted that further investigation of the landfill site would be merited. Limited concern was raised that no replacement waste facilities are proposed within the JAAP.

Both Councils note that concern has been expressed regarding the potential of the landfill site to come forward for development. On-going studies will assess the suitability of this location for development, setting out an appropriate remediation programme. It is anticipated that studies will be completed within a sufficient timescale to inform the Preferred Options JAAP.

It was outlined that an extension to the existing, or construction of a new Sewage Treatment Works may be necessary in order to meet increased demands from new development. Expansion of the Sewage Treatment Works could require the purchase of land from BAA Gatwick, and concern was raised that this process may be subject to delay. As such, it was considered that it may be appropriate for Crawley Borough Council and Horsham District Council to liaise with both parties in order to ensure this process is achieved within required timescales. The option of a new site was also considered as potentially being subject to significant timing implications.

The present sewage treatment works has a capacity to accommodate development in the short to medium-term. BAA Gatwick have indicated that they would be willing to release a modest area of land to Thames Water if it were needed to enhance their existing sewage treatment works¹. Thames Water have stated that it would be possible to upgrade the existing treatment works and provide a new connection to the West of Crawley site within a period of 3-5 years, and will explore opportunities for this provision through Asset Management Plan 5 and continued working with the Councils.

Transport was identified as a key priority in bringing forward the JAAP, with the outcomes of transport studies considered likely to have a major influence on proposals. In particular, it was considered that early priority should be given to resolving the issue of whether a relief road will be required, especially as this will impact on the overall deliverability of housing and employment land. Further representations considered that issues of flooding could potentially impact upon deliverability. It was also considered that development should only proceed once strategic infrastructure is in place, and noted that

¹ As set out under paragraph 12.136 of the Inspector's Binding Report into Development of the North East Sector, dated 22nd January 2007.

the environmental quality of the area will need to be assessed in order to inform decisions.

Issues relating to flooding, infrastructure, and the potential requirement for a relief road have been covered in detail elsewhere in this document.

If you are one of the stakeholders who have confirmed or amended a Position Statement, are there any particular areas you would like to comment on and have we understood your position correctly? (This may be in addition to any specific you may have on the Issues and Options document).

It was noted that where appropriate, all Position Statements should be updated. A representation by Crest referred to studies carried out on their behalf outlining that English Nature (now Natural England) may have misinterpreted the Preferred Options Local Development Document, and should as such update their Position Statement. Crest also considered that the position of the Highways Agency should be revised to reflect the withdrawal of their objection to development (This objection is withdrawn on condition that transport improvements are delivered and are in place to match the phasing of development, and that investment in sustainable transport is maximised).

Attention was drawn to monitoring undertaken at the landfill site west of Bewbush, which has been on-going following an agreement of risk-based monitoring with the Environment Agency in 2003. The representation outlines that monitoring has not indicated that the site is harming the environment or human health, which are the fundamental requirements and pre-requisites for the surrender of the waste management licence. The respondent outlined that a Closure Report is to be submitted to the Environment Agency with a view to submission of a Surrender of Waste Management License in mid 2008. It was recommended that the Environment Agency Position Statement is updated to reflect this.

The Preferred Options document will be updated to reflect all revisions made to position statements by stakeholders, and these revised statements will be considered during the drafting of the Preferred Options JAAP. Further opportunities to amend position statements will be provided as the JAAP progresses in order to ensure that the Submission JAAP is informed by an up to date evidence base.

Chapter 11 – Alternative Land Uses

Representations generally supported the consideration of alternative land uses within the Area of Study as part of an overall master planning exercise, though outlined that assurance should be provided that housing numbers will be met before alternative land uses are considered. As such it was suggested that the JAAP should emphasise that such uses are to be provided in addition to, rather than instead of, housing. It was noted that demand may exist for other alternative uses not mentioned within the chapter, including health and community facilities, care homes, and retirement homes.

Representations drew attention to specific areas of land considered appropriate for the development of alternative land uses. One respondent outlined that the golf course should be developed for housing, with employment and non-residential uses including

Park & Ride provided in the Langley Green area, and land west of Bewbush allocated for a hospital or university campus. It was noted that consideration should be given to the emerging West Sussex Minerals and Waste Development Framework, and outlined that the JAAP should give regard to the provision of a site for new or expanded waste management development. In light of this, the Holmbush Farm site at Faygate was put forward for public consultation in early 2007.

A single respondent outlined that requirements for additional land uses would be dealt with as 'Planning Obligations' controlled by Section 106 agreement. Concern was raised that it may not always be feasible for the proposed development to meet all requirements set out in local, regional and national guidance whilst remaining economically viable. It was considered appropriate for local authorities and other public sector agencies to decide upon the balance of contributions made by developers, while representations emphasised that the strategic location should not become a focus for the satisfaction of existing local deficiencies beyond the demand created by development. Several representations commented upon the specific alternative land uses set out in the chapter.

Cemetery

A single representation considered that the provision of a cemetery within the area of study would be going beyond the needs of the strategic development.

Golf Course

Representations considered that were the relocation of the golf course found to be necessary, the landfill site west of Bewbush may provide an attractive and sensible replacement site, complementing the strategic gap. Relocation of the golf course to the north of Ifield was also suggested. Another representation considered the landfill site to be a more appropriate location for the new neighbourhood, and preferable to the golf course, negating the need to relocate. It was considered that the inclusion of pay and play at the existing golf course should not be an important consideration within the Area of Study.

Gypsies and Travellers

A single respondent outlined an urgent need for a Gypsy and Travellers site with the Crawley Borough area, though considered the JAAP as unlikely to bring forward a suitable site within the necessary timeframe. It was suggested that it may be appropriate to identify a temporary site within Crawley Borough to provide a stop-gap solution while the two authorities consider the cross border benefits of including a site within the JAAP.

Hospital

Representations expressed strong support for the provision of a hospital serving the Crawley area, and it was considered that an agreement should be reached before any development proceeds in order to ensure hospital provision is made. Some respondents considered the site at Pease Pottage to represent the most appropriate location for such provision, considering demand for a hospital as a sufficiently exceptional circumstance to justify the release of this site. A single representation drew attention to recent studies,

and suggested that demand for a new hospital could potentially be exaggerated, outlining that the needs of the Health Authority should be assessed and a current review of medical practices undertaken before demand for new facilities is given specific consideration within the JAAP.

Park & Ride

Support was expressed for the delivery of a Park & Ride facility within the Area of Study, with representations emphasising that such provision would promote the goals of sustainable transport, particularly if linked to the Fastway network. It was noted that investigations into feasibility should be undertaken, and considered that a sound business case would need to be demonstrated. One respondent outlined that development funding could be provided from the new commercial uses associated with the new neighbourhood, alongside contributions from residential and commercial development in the town centre in lieu of on-site parking provision. Both the landfill site and golf course were suggested as potential locations for a Park & Ride facility.

Road Maintenance Depot

A single representation requested clarification that West Sussex County Council would fund any new depot. It was considered that accessibility would be a major issue for any depot, with immediate access to the primary road network required. It was also noted that should the new neighbourhood be served on sustainable transport principles, this may not be suitable for large highway vehicles.

Sewage Works

It was considered acceptable for the new development to fund any improvements catering for its own demands, though outlined that this should not apply to rectifying existing shortfalls in other development areas.

Strategic Open Space

A single representation noted that the Urban/Rural Fringe Study identified three individual landscape areas with the capacity to accommodate all or part of the development. The respondent expressed concern that inconsistencies exist in the study that restrict these development areas. Concern was expressed that some landscape areas have been exaggerated in terms of their perceived landscape importance.

University

A single representation discussed University of Sussex aspirations to locate a satellite campus within the north of the County, and Crawley Borough Council's preferred location to the east of Brighton Road. It was considered that the JAAP should explore the possibility of locating within the Area of Study, though noted that a University campus does not immediately seem to be compatible with a neighbourhood development.

Both Councils note the comments received relating to the Alternative Land Uses chapter, and these, alongside on-going studies, will duly feed into and inform the

Preferred Options JAAP. Of the on-going studies to inform the Preferred Options JAAP, those relating to Transport and Neighbourhood requirements are anticipated to provide a steer on the capacity to accommodate alternative uses within the Area of Study.

Question Set 7

Do you agree that the alternative land uses discussed in this document should be explored further through the JAAP?

Respondents were broadly supportive of steps to further explore the alternative land uses set out in the chapter, though it was considered that a commitment should be included within the JAAP to ensure that any such uses will be provided with necessary ancillary requirements such as housing for staff, students etc. It was felt that consideration should be given to the timescales of delivering alternate land uses, with those required in the short-term planned for as part of development. Concern was expressed that land uses considered as 'possibilities for the future' could cause delays in the JAAP as feasibility is investigated. It was noted that while the alternate land use set out within the chapter may be desirable in their own right, their inclusion should not prejudice the provision of the necessary homes. Some representations objected to the principle of further exploration of alternative land uses within the JAAP, expressing concern that these would occupy too great an area of land which could potentially be used for residential development.

Are there any alternative land uses not listed in this document that should be considered as part of the JAAP?

Support was expressed for the provision of a railway station within the Area of Study, and it was considered that the JAAP should take the opportunity for further exploration. It was outlined that land west of Bewbush would be a technically feasible location for such provision. Support was expressed for the creation of a nature reserve to provide a refuge for wildlife and improve links between the urban area and countryside. It was considered that Ifield Golf Course could be retained as a transitional zone, leaving the landfill site west of Bewbush as a preferred site for brownfield development. A single representation noted that the JAAP should give consideration to the intensification and expansion of touring pitches and caravan storage, while another considered that a site specific allocation should be made to allow for increased storage within the existing site at Amberley Fields. A single representation considered that there should be a prioritisation of alternative site uses, based on whether these are firm requirements now, or possibilities for the future.

Are there any parts of the Area of Study that a particular alternative land use should avoid?

Attention was drawn to the land situated between the south west of Ifield Golf Course and the north of the railway line. It was outlined that given the significant land designations, the area must be excluded from alternative land use development. Another representation outlined that given the 'hilly' nature of the golf course, and impact this may have on transport accessibility, this particular site may not be appropriate for a hospital. Should a new sewage treatment works be required, it was outlined that its

location should not prejudice growth to the west and north of Crawley, and that regard should be given to potential amenity issues such as odour.

Attention was drawn to possible timescale and deliverability issues regarding housing development at the landfill site, with one respondent outlining that building may not be feasible for 10-20 years. As such, it was considered that the site may not be appropriate for development, and that a solution would be to use the golf course for building, relocating the existing golf course to the landfill site. One representation outlined that the appropriate location for alternative land uses can only be explored through the detailed master planning process. A single representation expressed concern that there will be little land available to choose from if all alternative land uses are built.

It was considered that the Gatwick Safeguarding area should be safeguarded for airport uses and not considered for development until the outcome of Government studies regarding the future of Gatwick Airport are announced. Respondents outlined that greater clarity regarding any future expansion of Gatwick Airport should be provided within the JAAP, taking into consideration the land possibly required for this, and implementation principles that should be enforced.

Are there specific land areas within the Area of Study that lend themselves particularly well to any of the above uses?

Respondents considered that land uses such as Park & Ride, road maintenance depot, hospital, and university should be located on land with good access to the major road network, and alternative means of transport, including Fastway. It was considered that any green infrastructure could be provided either as a buffer between the new urban area and countryside, or in areas where built development may be considered inappropriate due to noise or ground condition problems.

One representation considered that land west of Bewbush would be the only site which could readily deliver a new railway station/interchange or Park & Ride facility. A single response outlined that strong planning reasons would be required to justify any relocation of the existing golf course, while another considered it essential that the golf course is relocated as it represents the most sustainable location for development. A representation considered that it may be appropriate to merge the golf club with another in the local area, rather than relocate elsewhere, outlining that this may reduce timescales involved with bringing this site forward to allow for residential development, possibly as part of a two-sited strategic development. It was noted that the JAAP should be sufficiently flexible to accommodate a portfolio of the various land uses referred to within the chapter.

Are there any alternative land uses, discussed in this document that should not be considered further in this JAAP?

No responses were received in relation to this question.

Chapter 12 – Next Steps

The role of the Issues and Options stage of the JAAP in gathering information and views from the general public and stakeholders with a view to informing the Preferred Options

stage of the JAAP was recognised. Representations were broadly supportive of the JAAP approach to the consultation process, and outlined that consultation should be on-going. It was noted that regular meetings to inform stakeholders as the JAAP moves towards Preferred Options would be beneficial.

Some concern related to the format of the Issues and Options document, in particular that the document does not accord with the requirements of PPS12 in terms of providing a sufficiently robust evidence base through which to inform the preparation of the final DPD. Particular reference was made to a number of studies which are on-going, while concern was also raised regarding a failure to identify 'alternative options' upon which the community's views are being sought. As such, it was suggested that a further Issues and Options document may be necessary once sufficiently robust evidence has been assembled.

Support for the JAAP approach to the consultation is noted. The role of the Issues and Options JAAP is to identify the general constraints and opportunities within the Area of Study, and promote debate as to the best way forward. While it is acknowledged that a number of studies remain on-going, a full level of detail is not required at the Issues and Options stage, and it is the role of the on-going studies to provide the robust evidence base to inform Preferred Options JAAP.