



Horsham
District
Council



Crawley
Borough Council

A summary of the main issues to emerge from the JAAP Preferred Options consultation

**Prepared by Horsham District Council and Crawley
Borough Council**

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

General comments on the contents of the Preferred Options document

Support was expressed for the preferred option west of Bewbush, with respondents considering the site to offer the most appropriate transport access and lowest aesthetic landscape value of all sites considered. Notwithstanding this support, a number of representations expressed concern regarding the general principles of development set out within the document. Some respondents considered the area west of Bewbush to be inappropriate for the development of 2,500 dwellings, whilst concern was expressed that the proposed siting of development both north and south of the railway line would fragment the neighbourhood.

Some comments considered the JAAP to be over-reliant on the neighbourhood principle, arguing that to develop on this basis does not provide sufficient flexibility in terms of meeting housing targets. It was suggested that the concentration of development in a single location would result in greater environmental impacts, both visually and through concentrating traffic within a specific area. As such, it was put forward that rather than provide a new neighbourhood and infrastructure, focus should instead be placed upon the conversion of disused buildings into housing, and improvement of existing facilities within the town. Some respondents also considered that the development of a number of smaller-scale building areas would be appropriate.

Representations outlined that natural features should be retained, and considered that development concentrated to the south of the railway to may be a means of achieving this. Particular focus was placed upon the need to avoid the coalescence of Crawley and Horsham, and some respondents expressed concern that development west of Bewbush could compromise the integrity of the strategic gap.

Site access, and in particular the generation of increased traffic levels, remained a key focus for many respondents. Concern was expressed that development would create significantly increase levels of traffic, particularly in rural areas between Crawley and Horsham, such as Rusper. 'Rat-running' through Rusper Parish was identified as a problem, and it was outlined that traffic generated by the new development could exacerbate this problem. Concern was also noted that problems of 'rat-running' would be generated should development west of Bewbush be linked into west of Ifield West.

Though support was expressed for the possible provision of a relief road, and the JAAP stance to not preclude its delivery, strong concern was expressed that such provision would encourage car travel, and further promote 'rat-running'. It was suggested that the developers should be required to undertake a comprehensive transport assessment, and considered that steps should be taken to alleviate traffic generation through the promotion of more sustainable transport measures including rail, park & ride, and improvements to bus services. Support was also expressed for the provision of traffic calming and safe crossing measures.

It was recommended that full consideration should be given to the needs of equestrians when planning the development, with particular support expressed for measures which would improve the fragmented nature of the existing bridleway and footpath network, and retain the existing Greenlink/Bridleway.

Doubts were expressed regarding the feasibility of the landfill site coming forward for development, with particular concern relating to a need for on-going monitoring, and the suitability of the site for residential use. Further concerns related to possible flood risk, whilst a single respondent noted that development should not take place in any location which would expose residents to current or future aircraft noise. It was put forward that natural screening from trees provides both noise screening and wildlife benefits.

Some comments related to architectural design of development, considering that there may be opportunities to enforce design quality standards to ensure that any community created remains attractive and desirable. Support was also expressed for the full exploration of opportunities to ensure the neighbourhood is sustainably designed, in terms of construction, energy use, and minimisation of car use.

Some responses related to issues of housing, with clarification requested as to whether the housing provided within the new neighbourhood would be regarded as fulfilling part of Horsham District Council's allocation. The economic growth projections for the area were questioned by an individual respondent, who noted that current over-estimation of these figures does not take into consideration a likely stagnation of the UK economy, and consequently a need to scale back housing targets. Concern was also expressed that the preferred options JAAP has effectively put on hold the long-standing need for a site for Gypsies and Travellers. It was noted that there is no need to wait until the Regional Spatial Strategy Review is complete before making provision, as need has already been identified in both Crawley and Horsham.

Respondents welcomed the commitment of both Councils to undertake an early review of their Core Strategies so as to consider the requirements of the South East Plan. Some concern was expressed that although a joint plan at present, Crawley Borough Council would become the lead planning authority.

Chapter 1 - Setting the Scene

The Joint Working principles of Horsham District Council and Crawley Borough Council were supported, as was the principle of considering the longer term role of the Area of Study in terms of meeting future need (post-2018). It was also accepted that a 'master plan' was appropriate. Surrey County Council raised concerns over the cross-boundary impact of the strategic release of land under the JAAP, particularly in relation to any requirement for further service provision and possible implications on transport infrastructure arising from the impact of development. It was considered that employment provision should reflect the findings of the Employment Land Review and those set out in the respective Crawley and Horsham Core Strategies, and should not lead to increased pressures for commuting and service provision in adjoining areas.

Support was expressed for the overall approach to landscape and biodiversity set out within the PO JAAP, though it was noted that consideration should also be given to the protection and enhancement of historical and archaeological sites, particularly Ifield

Court Scheduled Ancient Monument. It was also suggested that further consideration should be applied to cultural and heritage assessments, and recommended that a site specific historic landscape study, survey and assessment be carried out for the Kilnwood Historic Parkscap.

West Sussex County Council expressed disappointment that previous comments from Issues and Option regarding the WSCC Minerals and Waste Development Framework had not been carried forward into the preferred options document. In particular, WSCC placed focus upon the need for a waste management site in the Crawley area, identifying the expansion of the site at Holmbush Farm as a possible solution. WSCC underlined their desire to work with both Councils to identify the most suitable size and location for built waste management facilities. WSCC also noted that additional Household Waste Recycling (HWR) provision may also be necessary, possibly through index-linked developer contributions.

Support was expressed for the use of sustainable transport, including the possible extension of Fastway, though some concern related to possible funding implications relating to the possible provision of a relief road.

Chapter 2 - Development Vision Principles & Objectives

The Development Vision and Principles set out within the PO JAAP were generally supported, particularly the commitment to promoting strong links into the surrounding countryside. In this context it was highlighted that there is a need to avoid repeating, and rectify, past mistakes. The reference to protecting the setting of the Ifield Village Conservation Area was welcomed, though some concern was expressed that the guiding principles do not outline the need to minimise the impact of development on adjacent protected areas. It was also considered that further reference should be made to the need to protect and enhance biodiversity and promote the ecological network, possibly through the introduction of green bridges and buffer zones around important wildlife habitats. The need to prevent the coalescence of settlements was emphasised, with representations considering the retention of the Strategic Gap between the eastern boundary of the proposed development and Faygate to be especially important.

Some concern was expressed that the Neighbourhood Principle has been disregarded in the Preferred Option, particularly with regards the possible dividing of the neighbourhood either side of the railway. Conversely, representations also suggested that to apply the neighbourhood principle could result in a lack of flexibility in terms of housing provision through facilitating an over reliance on a specific area. Support was expressed for a centrally located neighbourhood centre accessible from both sides of the railway, with higher development densities located within the centre and close to Bewbush. Lower densities were recommended towards the western edge of development.

Chapter 3 - The Preferred Option, West of Bewbush

A broad mix of general support, observation and objection were received in relation to the identification of West of Bewbush as the Preferred Option. The overall support was tempered by concern, or the need for further work, on a number of issues.

Specific concern related to extra traffic congestion caused by development, particularly at peak times, and it was questioned whether, aside from increased bus provision, plans are in place to cater for additional traffic demands. It was also outlined that development should give full consideration to meeting the housing needs of vulnerable people in partnership with West Sussex County Council.

It was noted that the area referred to as 'archaeological parkscape' should more appropriately be referred to as 'historic parkscape', and suggested that further study may be required in relation to the Kilnwood Historic Parkscape. It was also noted that paragraphs 3.6-3.20 make no reference to cultural heritage, and attention was drawn to a number of archaeological sites within and adjoining the Preferred Option. It was put forward that any excavation required as part of landfill site remediation should consider alluvial deposits that may be buried below the landfill.

In terms of objections to the Preferred Option, some respondents considered that to develop west of Bewbush would compromise the strategic gap, failing to maintain the separation of Crawley and Horsham. It was also considered the Preferred Option could be damaging to the Faygate and Rusper areas, and suggested that alternative brownfield sites would be more appropriate for development. Further concerns related to the landfill site, and it was considered that the high financial cost of remediation could prohibit the development of affordable housing, making the development undeliverable.

Introduction

Concern was expressed in relation to the identification of land west of Bewbush as the Preferred Option. It was suggested that only a small area of the overall site can be considered as brownfield land, with much of the site encompassing countryside falling within the strategic gap. As such, it was considered that emphasis should be placed upon the identification of previously developed brownfield sites which would exert less impact upon the strategic gap. It was also put forward that the identification of the landfill site as part of the Preferred Option has been based on incomplete and inaccurate information. Respondents considered that that without proper monitoring and assessment, the site cannot be identified as being able to accommodate a new neighbourhood. As such, it was suggested that the landfill area be removed from any preferred option, with the original Horsham District Council option reinstated.

Location

A number of representations expressed concern regarding the location of the Preferred Option. Strong focus was placed upon the environmental impacts of a new neighbourhood, with concern expressed that development would narrow the strategic gap between Crawley and Horsham, and also result in the destruction of fields, woodland and a variety of vibrant wildlife habitats. Particular reference was made to the potential impact on Rusper, Faygate and the surrounding rural area, and it was outlined that Kilnwood Lane in particular provides a strong natural boundary to Rusper. Concern was expressed that development abutting this area could result in the erosion of the area's strong rural character, and it was suggested that further reference should be made to the protection of this area. Further concerns were raised in relation to possible compulsory purchase of property, and the amenity impact of development upon existing properties. With regards the latter, a need to effectively screen existing properties from development was identified.

A number of representations put forward that the site south of the railway line is suitable to accommodate the whole development, negating the need to develop north of the railway, thereby reducing the impacts of development on Rusper and the Kilnwood Lane area. It was also considered that to accommodate the whole development south of the railway would negate the need for a relief road, thereby avoiding longer-term development pressure within the Area of Study. In the event that further development land were to be required, it was suggested that this could be accommodated to the west of the Preferred Option on the potential substantial medical facility site. Limited support was expressed for the provision of two neighbourhoods, one west of Bewbush, and one west of Ifield, to provide a total of 2,500 dwellings.

Statement 1

West of Bewbush is identified as the preferred option for accommodating the development of a new neighbourhood of 2,500 homes and other uses.

Support was expressed for the identification of land west of Bewbush as the preferred option, and it was generally considered that the site possesses a number of advantages. Specifically, respondents considered west of Bewbush to benefit from good transport links, especially road and rail, which would negate the need to provide a Western Relief Road. The avoidance of the existing and potential Gatwick Airport 60 Dba noise shadow was considered a key benefit, and it was emphasised that development should not impede any future application for airport expansion or a second runway at Gatwick Airport. It was noted that development west of Bewbush would exert the least impact on the surrounding countryside, and support was expressed for the retention of woodland within the preferred option. Attention was also drawn to the relatively low risk of flooding within the preferred option.

It was acknowledged that the alternative areas for development, particularly West of Ifield and Ifield Golf Course, presented a number of obstacles to development. Possible constraints included the potential noise shadow of a second runway at Gatwick Airport, and the difficulties of integrating alternative sites with the existing transport network. It was also considered that development divided between West of Bewbush and West of Ifield would not realise the synergies of investment.

Notwithstanding support for the preferred option, a number of representations raised objection to the siting of a new neighbourhood west of Bewbush. A key concern centred upon the narrowing of the strategic gap between Crawley and Horsham, and it was suggested that development should instead be directed towards other areas of previously developed brownfield land identified within the Horsham Core Strategy. It was noted that much of the land encompassed within the preferred option comprises greenfield land, and in light of this it was suggested that the land north of the railway should be excluded from the preferred option due to its greenfield nature.

Further objection related to the volumes of traffic arising from a single site, and concern was expressed that vehicular links from the new neighbourhood could lead to an increase in traffic volumes along Rusper Road. As such, both Councils were urged to separate local traffic from through-traffic. Concern was also expressed regarding the possible cost implications of developing the landfill site.

Representations stressed that the new neighbourhood should remain in-keeping with the neighbourhood principle, and should maintain a gap between the development and Ifield West. A single representation rejected the application of the neighbourhood approach to development, considering the approach to lack flexibility in terms of housing supply through placing too great an emphasis on a single site.

Some respondents put forward that the possible provision of a strategic health facility should be accommodated within the boundaries of the Area of Study, suggesting that if this cannot be achieved, additional or alternative sites should be brought into the preferred option. It was also put forward that the upward gradient of the land north of the railway could expose the lower-lying Buchan Country Park, Kilnwood Lane ridge, and conservation areas west of Ifield West to increased levels of noise, light and dust pollution.

Environment

Representations commented that appropriate provision of green infrastructure and green space should be central to any development, and support was expressed for the PO JAAP approach to protect and retain existing hedgerows, woodland and green links. It was however, considered that this approach could be improved through adopting Multifunctional Green Networks Policy to conserve and enhance natural areas. Whilst it was noted the no identified Public Rights of Way run through the site, attention was drawn to the need to protect the rural setting of Bridleway 1550, running along the eastern and northern boundary of the site. In this regard, clarification was requested as to which green links had been identified within the PO JAAP, and suggested that reference be made to specific bridleway numbers. Steps to preserve, and better integrate the two areas of ancient woodland were also supported, and it was suggested that opportunities should be taken to provide links between these areas and the wider countryside and footpath network.

A key concern related to the impact of development on the surrounding environment, particularly in terms of loss of wildlife, breeding grounds, and amenity, and it was recommended that the development area should be assessed to identify important natural habitat types. Several respondents also highlighted the need for the JAAP to consider steps to manage the impact of development, and enhance biodiversity and conservation. It was suggested that the JAAP should make reference to the proximity of the preferred option to nearby environmental designations including Area of Outstanding Natural Beauty, SSSI, and Ancient Woodland. Respondents emphasised that full consideration should be given to ensuring development is well designed and inclusive, remaining in-keeping with the character and local distinctiveness of the countryside. Support was expressed for the PO JAAP recognition of the value of House Copse SSSI and Kilnwood Copse Ancient Woodland, and particular reference was made to PPS9 which specifically calls on local authorities to identify and protect areas of ancient woodland. As such, it was suggested that a sizeable buffer zone would be necessary to limit the impact of development. It was also noted that an upcoming Natural England survey of the Weald and Downs Ancient Woodland should inform how the site can be managed to maximise biodiversity, maximise connectivity, and minimise harm. Within the site, it was also stressed that Pondtail Shaw and Capron Grove should also be preserved, and fully considered at the master planning stage.

Some concern was raised in relation to the impact of development on Kilnwood Lane and its adjoining countryside. It was suggested that on environmental grounds, the development area should not extend to the north of the railway. The possibility of buried remains of Roman, Medieval, or early Medieval Iron working in the area marked Archaeological Parkscape was raised, with concerns expressed that to develop in this area could potentially result in loss, or damage to, these remains.

Comments were also made in relation to other possible development locations. It was put forward that, in light of the findings of the Urban Rural Fringe Study, the JAAP should acknowledge that there are no overriding environmental constraints to the development of a neighbourhood West of Ifield in addition to West of Bewbush, and suggested that a two-neighbourhood strategy could be implemented without the need for a link road. It was also suggested that in light of possible concerns regarding the remediation and development of the landfill site, it may be necessary to utilise smaller sites away from the landfill to meet housing targets.

Respondents outlined that steps should be taken to reduce water pollution and improve the quality of controlled waters within the borough, particularly surface and groundwater. It was considered that this could be achieved through treating surface run-off from development through a Sustainable Urban Drainage System (SUDS). Attention was also drawn to the potential of development to increase pressure on water resources and existing sewerage infrastructure, and it was noted that an upgrade of Crawley Sewage Treatment Works, or provision of a new facility, would be required. An element of caution was raised that such provision would be subject to long lead-in times of up to five years, with implementation possibly taking between 8-10 years. It was emphasised that the rate of development should remain in line with the capacity of sewerage and sewage treatment, with such provision provided prior to the commencement of development where increased capacity is required. As such, the preferred option not to provide a sewage treatment works in the short to medium term was considered inappropriate.

Statement 2

The development of a new neighbourhood West of Bewbush is the least constrained by environmental designations and can be suitably accommodated within the existing landscape.

Whilst limited support was expressed for this statement, it was again suggested that land to the north of the railway should be protected from development due to its special landscape value. Some respondents outlined that West of Bewbush is constrained by factors including the railway, Bewbush Brook, the strategic gap, road infrastructure, and the remediation costs of the landfill site. It was suggested that the utilisation of a number of smaller sites would allow housing requirements to be met without affecting any environmental designations.

Statement 3

Land West of Bewbush is the least constrained location across the Area of Study in terms of flood risk.

Support was expressed in relation to Statement 3. It was generally accepted that flood risk is considered manageable within the preferred option area, and noted that the

recommendations of the Strategic Flood Risk Assessment should be implemented in order to ensure that flood risk is reduced downstream of development. Some concern was expressed that the PO JAAP does not acknowledge that the flood risk constraint to the development of a neighbourhood does not preclude development West of Ifield in parallel to development West of Bewbush.

Inert Landfill Site Remediation

Support was expressed for the identification of the brownfield landfill area within the preferred option, and it was generally considered the available studies have indicated that with suitable remediation works the site can be made available for residential and other development. It was also noted that there are a number of successful examples where former industrial brownfield sites have been made suitable for residential development.

Notwithstanding this support, several representations expressed strong concern regarding landfill remediation. It was noted that gas risk assessments have indicated that the site is designated as a 'red' zone, in which standard residential housing is not normally acceptable. It was also suggested that the method of Stone Piling on landfill sites, as considered by Crest Nicholson, has not been tested to the depth and scale required on the landfill site. Some representations put forward that the JAAP evidence base does not sufficiently demonstrate that the necessary remediation can be completed within the JAAP period, recommending that this possible source of delay should be acknowledged within the JAAP. Other respondents went further, suggesting that the preferred option is undeliverable, and in light of these concerns it was put forward that the JAAP should make an undertaking to ensure that planning permission is not granted until such time that all necessary remediation works have been fully completed.

Statement 4

It is considered that the proposed remediation works will remove the risks to future residents, and contamination to the groundwater and soils. Therefore, ensuring the site will be fit for development, particularly residential.

It was put forward that proper investigations are yet been undertaken with regard making the landfill site suitable for residential development, and suggested that there is no evidence of a landfill site of this size, depth and nature having being successfully developed for housing. Further concern was expressed that the possible need for 40ft stone column foundations to development is untested and undeliverable. Concern was also expressed that future residents could be exposed to contamination from the landfill including dust and vapours. In light of the above, it was suggested that the landfill site be removed from the preferred option.

The Environment Agency (EA) set out that where development is proposed on or near a site known or reasonably believed to be contaminated, a site assessment will be required to establish the nature and extent of contamination prior to determining development proposals. It was emphasised that development would not be permitted unless effective measures are taken to treat or control any contamination, so as to ensure that future occupiers of the land are not exposed to unacceptable risk, and would not contaminate watercourses or adjoining land. The EA noted that it would take several years before confirmation of required monitoring shows that the Bewbush/Holmbush

landfill site is safe and the waste management licence can be surrendered, and confirmed that the surrender of the waste licence remains subject to additional trial pitting, boreholes, gas monitoring probes and surface water sampling. In light of this, the EA called upon the JAAP to identify other viable developable sites for consideration should the current studies find the site unsuitable for housing development.

Housing

It was considered that it may be necessary to locate any possible strategic health facility within the preferred option boundary, and questioned whether the preferred option site would also be capable of accommodating a neighbourhood of 2,500 houses should this be the case.

Statement 5

The neighbourhood will deliver approximately 2,500 dwellings of which 60% should be for the general market and 40% should be affordable housing. Of the affordable housing provision, 70% should be social rented and 30% intermediate housing.

The development should provide a mix of housing type, tenure and size. Market and affordable housing should be provided within each phase of development and the affordable housing should not be concentrated into clusters larger than 10-12 units.

Attention was drawn to current difficulties facing first time buyers, and wide-ranging support was expressed for the principles set out within Statement 5, particularly with regards a minimum provision of 40% affordable housing, and the commitment to deliver a range of housing types, tenures and sizes. It was suggested that at least 50% of any rented social housing should be available to people on the Crawley housing list or key workers.

Sustainable Development Construction

Representations placed particular emphasis upon the need to construct the new neighbourhood as an eco friendly development, rather than a standard development incorporating a few eco friendly features. Support was expressed for the inclusion of a spectrum of sustainable development measures including energy efficient design, solar panels, and rubbish processing/energy efficient waste management. Particular support was also expressed for water efficiency and recycling measures including grey water and rain water recycling. It was noted that development should place high regard on integrating new buildings with the existing urban and rural environment, and a strong focus was placed upon the undertaking of design-led initiatives to encourage nature habitat creation.

The Environment Agency expressed support for the recognition within the Strategic Flood Risk Assessment (SFRA) that the most sustainable way of reducing flood risk will be through flood plain management. It was noted that some land may be required for future flood management, possibly for water storage, and outlined that this area should be safeguarded from development.

Statement 6

The new homes in the neighbourhood should be developed to at least, or equivalent to, Level 4 of the Code for Sustainable Homes. New homes built in the period 2016 and beyond should be constructed to a standard meeting Level 6 of the Code for Sustainable Homes. Relevant non-residential development in the neighbourhood to meet a BREEAM standard of at least 'Very Good' or its equivalent under any replacement code.

General support was expressed for the aspirations set out under Statement 6, though it was questioned why the JAAP does not aspire for greater sustainability, including a requirement for development to meet the BREEAM 'Excellent' standard or equivalent.

Employment

It was generally considered that the preferred option west of Bewbush would not be suitable for strategic level employment provision due to its lack of connectivity with Gatwick Airport and the lack of certainty regarding the provision of a relief road. As such, support was expressed for the JAAP stance that employment provision in the new neighbourhood should be of a local, rather than strategic nature. It was considered that the provision of a limited amount of small and medium scale business space as part of the new neighbourhood, possibly similar to Crawley's Basepoint centre would be appropriate, and respondents noted that such provision would remain in-keeping with the neighbourhood principle through meeting local employment need. Respondents also put forward that local level employment would not require the provision of a railway to bring people into the area.

It was noted that the Adopted South East Plan identifies Crawley as a focus area for strategic employment growth, though attention was drawn to the shortage of suitable business sites in the area. As such, it was suggested that the provision of adequate nearby employment land to meet demand would be important in ensuring business remains in the area and continues to grow. It was stressed that were any land allocated for employment to be released for housing or mixed-use development, additional sites should be set out for employment to ensure sufficient sites remain available to support the local economy. In light of aspirations for steady and sustainable economic growth set out within the Adopted South East Plan, and also with regard the longer-term role of the Area of Study, support was expressed for the JAAP objective to revisit the issue of strategic employment provision.

It was suggested that the Submission JAAP should give consideration to the possible relocation of car showroom facilities from elsewhere in Crawley and Horsham. Additional employment, further education and leisure use was promoted in the wider Crawley context.

Statement 7

The preferred option is to provide small business incubator floorspace within the neighbourhood and not provide strategic employment elsewhere within the Area of Study.

It was observed that Crawley's neighbourhoods have not traditionally included large employment centres, and considered that this approach should be maintained. Particular support was expressed for the provision of sustainable mixed-use development to meet the needs of a healthy and balanced economy and community. It was however

considered that the JAAP does not clearly set out the plans for employment land provision, and concern was expressed that the document does not go far enough to ensure the neighbourhood can be self-sufficient. It was considered by some parties that further traffic analysis would be required to ascertain the impact of employment use and wider strategic allocations on the rural road network.

Neighbourhood

Though the selection of west of Bewbush as the preferred option was generally endorsed, it was suggested that the Submission JAAP should review the potential form and structure of a new neighbourhood west of Ifield. Conversely, another respondent suggested that the flooding and transport constraints facing this area would preclude its development.

Broad support was expressed for the retention of the neighbourhood principle, and for the preferred option of providing a full range of local services and facilities to meet the needs of local people. It was considered vital that such facilities are sustainable in the long-term, with a general consensus that the neighbourhood centre would most appropriately be located centrally within the development. Higher residential densities were considered appropriate adjacent to the potential railway station, with lower densities supported towards the edges of development. With regards railway access, it was noted that a direct link to Faygate station would be desirable. A single respondent considered that high density development would not be appropriate close to Bewbush. The proposed level of retail floorspace was also supported, and was considered to conform with PPS6 through remaining in scale with development and not harming the existing retail hierarchy. Respondents noted that the severing of the preferred option site by the railway line would be a key obstacle to overcome.

The JAAP objective to ensure a provision of green infrastructure and open space within and beyond the new neighbourhood was supported, though respondents emphasised the need to protect and enhance green space within the preferred option site, particularly areas of SSSI and ancient woodland. It was outlined that existing links through the site to adjoining countryside should be protected, and where appropriate, new links created. The importance of passive/informal recreation space was outlined, and it was suggested that a further paragraph be included within the JAAP focusing on the value of informal recreation space both within and beyond the new neighbourhood. It was considered that development should contribute towards strategic sport and leisure facility provision through the planning gain process, whilst respondents also put forward that the area of land west of Ifield West offers an opportunity for the provision of wider green infrastructure.

Representations noted that the landscape south of the railway is moderately sensitive to change, and suggested that the rural character of this area should be maintained. Some concern was noted regarding the close proximity of development to House Copse, ancient woodland and SSSI, and it was emphasised that serious consideration should be given to the protection of these areas at the masterplanning stage. It was also noted that the area of land to the north of the railway line, and particularly to the west of Gossops Green, will require careful planning to ensure the quality of landscape is maintained.

Statement 8

The preferred option is to provide sufficient services and facilities to meet the needs of the neighbourhood to adhere to the neighbourhood principle. Also, opportunities to enhance the position regarding service and facility provision within adjacent neighbourhoods will be explored.

It was put forward that a neighbourhood cannot be created which would be divided by the railway line. The possible provision of library facilities within the new neighbourhood were supported, and clarification was requested as to whether a flexible Place of Worship would be incorporated in the development.

Support was expressed for the provision of accessible natural green space within 300m of homes, and it was suggested that opportunities should be taken to link the development to existing footpaths and surrounding countryside. It was also suggested that ANGST standards should be applied.

Transport

A large number of representations were received in relation to the Transport section of the document. A key focus of concern related to the possible provision of a Western Relief Road, particularly in light of the JAAP focus on ensuring development does not prejudice any future requirement for a relief road. It was suggested that to partially implement the first phase of such infrastructure within the preferred option implies that further phases of construction will be undertaken, and respondents considered that construction of a western relief road could create a boundary within which further development might be justified in the longer-term. As such, it was put forward that reference to any Western Relief Road should be removed from the JAAP. Representations outlined that detailed long-term transport planning would be necessary to ensure that the demands of future development at Crawley, Horsham, Horley, and possible expansion of Gatwick Airport can be accommodated without facilitating an ever-sprawling development.

Further concern was expressed in relation to the environmental impacts associated with the construction of a Western Relief Road. It was considered that such provision would have a severe ecological impact on ancient woodland and local wildlife, whilst concern was expressed that any relief road provision would further encourage car use, thereby increasing exhaust emissions. Further concern related to the financial cost of constructing a relief road, and clarity was requested as to the intention of the JAAP when stating that '...studies and assessments indicate that development beyond the neighbourhood being planned for would trigger the requirement for a WRR if in a phased approach'.

Notwithstanding this concern, some representations expressed support for the provision of a Western Relief Road, with attention drawn towards the West Sussex Structure Plan requirement for a relief road in accompaniment to any new neighbourhood. It was noted that the A264 linking Horsham and Crawley is currently operating close to full capacity, and respondents considered that with the new neighbourhood likely to produce an additional 3,000-4,000 private motor vehicles, it remains imperative that allowance is made for the additional traffic generated. Furthermore, it was suggested that a WRR would also alleviate traffic congestion within Crawley, particularly at the crowded Cheals roundabout, and along the surrounding country roads of Rusper. The provision of a

WRR was also considered to be essential to economic development, and it was observed that the PO JAAP does not give regard to the economic benefits of a new road connection linking the A23 at Gatwick Airport to the A264 east of Faygate. It was noted that should the WRR not come forward, measures would be necessary to increase capacity along Horsham Road, particularly at Cheals Roundabout, and exiting Gossops Drive. Respondents suggested that the construction of any WRR should be equitably sourced through Section 106 planning obligations from the principal developers.

Again, reference was made to the potential to accommodate two neighbourhoods to the west of Bewbush and West of Ifield, and it was considered that the Submission JAAP should acknowledge the potential to put in place elements of a future Western Relief Road. It was also emphasised that although a development of 2,500 dwellings would not in itself require a relief road, decisions should not be taken which would preclude its longer-term construction, particularly with regards the capacity and location of an A264 junction.

Though the contribution of the public footpath network and Fastway services was acknowledged, it was noted that new development both west of Crawley and west of Horsham would exert a significant impact on the local road network. Strong concern was raised in relation to issues of 'rat-running', with particular focus placed upon potential impacts on Faygate and Rusper, and it was suggested the JAAP does not currently give sufficient recognition to the congestion issues facing local roads. It was outlined that well thought out transport planning would be essential, and suggested that further traffic studies will need to be undertaken, with strong consideration accorded to implementing measures to reduce the burden of development on the local road network. Suggested solutions included the highlighting of existing problems through village action plans, the imposing of restrictions on HGVs, the reduction of speed limits through villages, and installation of traffic calming measures.

Strong support was expressed for measures to maximise the provision of sustainable transport measures within the development, though it was noted that further evidence will be required to demonstrate that the proposed public transport services are deliverable, able to provide access to a full range of facilities, and suitably attractive to effectively reduce the impact of vehicular traffic generated by the development. An extension to the existing Fastway service was considered to be imperative, and it was acknowledged that the preferred option is well placed to benefit from a frequent and direct link to Crawley Town Centre, Manor Royal Industrial Area, and Gatwick Airport, possibly extending to Three Bridges. It was also noted that potential exists to provide additional non-Fastway bus services, possibly including routes into Horsham. Respondents considered that in order to encourage greater bus use, development should include bus lanes, bus-only links, and wide road layouts. It was also noted that any Park and Ride site situated on the A264 could be served by Fastway links.

Support was also expressed for the provision of a new train station, and Network Rail discussed the possible provision of a Park and Ride station at Holmbush. It was outlined that the closure of Faygate station would be necessary to maintain journey times were this option to be pursued, and confirmed that should a new railway station not come forward, it would be necessary to lengthen the platforms at both Faygate and Ifield stations and provide additional parking spaces to accommodate increased demand. It was noted that further parking provision may also be necessary at Crawley and Three Bridges stations, and outlined that it may be necessary to close a number of footpath

and vehicular level crossings. A single representation drew attention to South East Plan aspirations to encourage the modal shift of freight from vehicle and air to rail transport, and it was suggested that underused sidings at Three Bridges station may present an opportunity for inter-modal interchange.

Support was also expressed for improving links for other sustainable transport methods, including equestrians, cyclists and pedestrians, though concern was expressed that any increase in traffic associated with development would create an unsafe environment for these users. As such, emphasis was placed on the need to implement greater connectivity, and it was suggested that the provision of alternative routes for these users should be a central consideration for the JAAP. Support was expressed for the provision of a cycle link between Crawley and Horsham, linking into Faygate Station, whilst the need to provide safe crossing points was emphasised, particularly in the design of any second bridge across the railway, and through the provision of a safe grade-separated crossing across the A264. It was also considered that opportunities should be taken to link the existing bridleway 1550 and a new multi-user footpath to the partially developed relief road.

Some representations put forward that all significant developments within the Gatwick Sub Region should contribute towards wider infrastructure requirements, particularly with regards highways and transport. Attention was drawn to the limited available capacity on both the M23 and its junctions, and the A23, and it was considered imperative that any future transport assessment, and ultimately, the Submission document, address these issues and promote joint working with the Highways Agency and neighbouring authorities. Support was expressed for undertaking further assessment of the cumulative impacts of the development on the road network, and it was advised that appropriate regard should be given to the operational improvements required at all relevant junctions, including M23 junctions 10, and 11. It was also emphasised that while any necessary improvements to junctions could potentially be part-funded by SEERA, developer contributions would play an important role in funding any improvement to the trunk road network.

The Highways Agency confirmed that further work has been undertaken to assess the traffic impact of the preferred option of highway access from the A264 with no Western Relief Road, though stressed that work remains on-going, and a final conclusion cannot be provided at present. Initial results have shown that AM peak flows on the A264 west of M23 junction 11 would increase considerably without the WRR, with lower increases during the PM peak as routes through Crawley become increasingly used. It was noted that should development west of Bewbush proceed without a WRR, improvement would be necessary to M23 junction 11 in particular. It was considered that strong car reduction measures and public transport improvements will be necessary to ensure junction improvements are kept below 'major' levels, and both Councils were urged to include policies to this effect within the Submission document.

Some concern was expressed that the preferred option does not give appropriate regard to West Sussex Structure Plan Policy NE17, which requires that a Western Relief Road is provided in association with the strategic development west and north west of Crawley. In particular it was considered that in light of the limited technical information made available to date, it cannot be concluded that development can be accommodated west of Bewbush without the provision of a complete relief road. Further concern was expressed that transport assessment work to date has not been supported by agreed

modelling outputs. West Sussex County Council did however acknowledge that the detailed transport modelling now emerging would be studied in full, and confirmed that they will consider reviewing their position regarding relief road provision once firm conclusions have been reached. It was outlined that unless such conclusions are reached, West Sussex County Council will object to a Submission JAAP which does not include provision for a full WRR.

It was questioned whether the highway infrastructure referred to under paragraph 3.99 as 'a 1.5km road (northbound) to the west of the study area to be accessed via a large new roundabout on the A264' would constitute the first stage of a relief road, and suggested that this section should outline the requirement to improve the local highway network, especially at key junctions. It was set out that the proposed transport package to support the development should ensure that existing A264, A2220, A23, and M23 junctions are improved to cater for increased traffic generation, whilst improving accessibility to and from the development by non-car modes. The need to reduce rat-running on local roads including Gossops Drive, Ifield Drive and Ifield Avenue was outlined, as was the need to prevent this within the development itself. As such, it was considered that options to implement traffic measures along existing roads such as Ifield Avenue or Gossops Drive should be explored. Representations also noted that no detailed assessments of the form and location of the primary site access roundabout or secondary left in/left out junction onto the A264 have been undertaken with respect to the preferred option. The need for development to be supported by a full Transport Assessment and associated Travel Plan was also emphasised.

Respondents considered that emergency access provision should be provided for the north of the preferred option if the development is to be served by a single point of access, other than where West Sussex Fire and Rescue Service confirms that this is not required. It was noted that the new neighbourhood would initially make use of existing Bewbush primary schools and Ifield Community College or Thomas Bennett, and it was considered vital to ensure safe routes to school are planned. It was also requested that any new development west of Bewbush should include safe access to Beaubush Cottage, with access direct to and from the A264 prohibited.

Statement 9

The preferred option is to provide the neighbourhood without a Western Relief Road, but with sufficient highway infrastructure to operate as a self contained development accessed from A264. Opportunities to incorporate sustainable transport measures will be maximised. The Submission JAAP will be subject to further detailed transport studies and assessments.

Elements of both support and opposition were expressed in relation to the possible provision of a Western Relief Road. Support was expressed for the PO JAAP objective to provide development without, though not precluding, a relief road, though some concern was expressed that to plan for a 'first stage' of such provision could encourage its construction. Some respondents expressed concern that any Western Relief Road provision would lead to the destruction of the countryside, potentially facilitating development in the longer-term through encouraging further in-fill towards Crawley. It was noted that a WRR could increase congestion in the area, and concern was expressed that were a relief road to run through the heart of the neighbourhood, considerable disturbance would be caused to residents. One respondent emphasised

that a Western Relief Road would not be required for the preferred option, suggesting that such provision was only considered necessary in the West Sussex Structure Plan because the most prevalent site at the time was the area of land to the west of Ifield. The possible financial costs of providing a relief road were a cause of concern, and it was questioned whether pooled contributions from further phases of development would on their own provide sufficient funding for its delivery.

A number of representations drew attention to the requirement for a Western Relief Road set out by West Sussex County Council, considering such provision to be central to development. It was put forward that a relief road would be essential in reducing traffic congestion associated with development, particularly through avoiding the increased use of local roads and villages as rat runs. In this context particular reference was made to use of the road linking Charlwood and Ifield as a short cut, though it was noted that further evidence regarding the impact of development on local roads would be required.

Respondents also outlined that businesses in the area depend heavily on the road network, emphasising that development should not take place faster than the provision of infrastructure, road alterations and public transport services. Whilst JAAP aspirations to explore all opportunities to maximise sustainable modes were supported, it was considered that any transport proposals should meet the needs of local businesses. With regards the JAAP stance that any highway infrastructure provided should not prejudice or constrain the longer-term role of the Area of Study, it was considered that the undertaking of further transport modelling work would be imperative.

It was suggested that the concentration of development within a single area would have a greater cumulative impact upon the existing road network, and suggested that a series of smaller developments would allow housing targets to be met whilst reducing the impact of traffic within a particular location.

Utilities Infrastructure

A number of responses were received with regards to sewage infrastructure. Thames Water expressed some concern that the PO JAAP is overly optimistic in relation to sewerage infrastructure, noting that whilst engineering solutions are available to serve the development, a suitable phasing arrangement will be necessary to ensure infrastructure is in place ahead of development. As such, it was considered that the wording of paragraph 3.115 should be amended to acknowledge the possible constraints facing the expansion of the current sewage treatment works or provision of a replacement facility. In light of possible delays to estimated time frames for expanding or providing new sewage treatment works, respondents questioned whether there should be a requirement preventing new development from being occupied until such time that the required infrastructure is provided. It was outlined that whilst this approach could impact upon the delivery and phasing of development, failure to include such a requirement could lead to deterioration in water quality. It was also observed that possibly unpleasant smells from the sewage works could impact upon residential amenity.

Representations noted that the provision of new homes will inevitably increase the demand for water. In light of the severe water shortage of summer 2006, it was questioned whether plans are in place to meet any additional demands created by development.

West Sussex County Council requested that a 2.0 hectare site be reserved on the southern edge of the allocation for a possible strategic highway depot use. It was suggested that this site allocation may also be appropriate as a location for the Sussex Air Ambulance.

Statement 10

In light of the current evidence base it is considered the preferred option can be adequately serviced by utility provider infrastructure.

Concern was expressed that Statement 10 provides an overly positive picture, making no mention of the difficulties and time constraints involved in providing the necessary sewerage and sewage treatment infrastructure. As such, it was outlined that the Utilities Undertakers Position Statements set out within the JAAP should be amended to provide details of these constraints. Furthermore, it was considered that Crawley Core Strategy Policy ICS2, does not sufficiently address issues of water and wastewater infrastructure, and suggested that a specific policy should be included within the JAAP to ensure that sufficient sewerage infrastructure capacity is provided before development is occupied. It was also considered that the JAAP should include further policies relating to development phasing, and the possible development or expansion or development of water supply or waste water facilities.

Southern Water expressed broad support for the thrust of Statement 10, emphasising that they would continue to plan for the provision of water resources to serve the development through their Water Resources Strategy. It was outlined that a pre-construction agreement would be sought in relation to water supply infrastructure at large and/or mixed ownership sites in order to promote sustainable water supply networks. It was also noted that existing below ground infrastructure has been identified on the alternative site West of Ifield, which should be fully considered were the site to be allocated in the future. It was also confirmed that no water supply infrastructure crosses the preferred option site.

Chapter 4 - Alternative Options

It was observed that a number of the selected preferred options have adopted a 'do nothing' approach, and suggested that this would negate the very purpose of the JAAP. In particular, it was considered that the examination of the preferred options does not explain clearly why the selection of a particular option has been considered more sustainable than another; e.g. the decision to not provide a cemetery rather than provide one, or the decision not to provide strategic employment. It was suggested that a greater emphasis could be placed on sustainability rather than the land intake of physical infrastructure through detailed land use planning. It was also considered that development, particularly the provision of a new university, would provide an opportunity for the enhancement of low value conservation sites and creation of ecological networks.

Thames Water emphasised that the comments relating to infrastructure set out under paragraphs 4.12, 4.19 and 4.25 were overly optimistic with regards sewerage infrastructure, and emphasised that a suitable phasing arrangement would be necessary to ensure infrastructure is in place ahead of development.

Statement 11

No comments were received in relation to this statement.

Land West of Ifield

Attention was drawn to the presence of Ifield Court Scheduled Ancient Monument within this area of land, and it was suggested that the text of paragraph 4.6 be amended to reflect its legal protection. Some support was expressed for the development of two neighbourhoods, and it was suggested this approach would provide for a better range of housing choice for future residents. As such, an objection was raised regarding the decision not to identify West of Ifield as the preferred option. It was considered that the constraints facing this area should not be seen as a factor limiting the inception of a new neighbourhood in this location at the current time, and was put forward that the site could provide a high-quality living environment for future residents, without the uncertainty of the former landfill site, and benefiting from an absence of rail and road noise.

Statement 12

Strong support was expressed for the decision not to identify West of Ifield as the preferred option. Respondents observed that this area of land is of greater ecological and landscape sensitivity than the preferred option west of Bewbush, and particular attention was drawn to the area of ancient semi-natural woodland. It was outlined that development of this area would result in a considerable negative impact upon the habitat through edge effects, fragmentation, and potential woodland loss. Support was also expressed for the JAAPs acknowledgement of the high landscape quality of countryside adjoining Ifield Village Conservation Area, its contribution towards enhancing the setting of Ifield Village, and its provision of access between the urban and rural environments. It was noted that opportunities should be taken to enhance this area further in terms a green infrastructure approach in the master plan. Further support was expressed for dismissing West of Ifield as the preferred option, particularly on grounds of access difficulties, the noise shadow of a potential second runway at Gatwick Airport, drainage problems and flood risk.

Land at Ifield Golf Course

Whilst some support was expressed for the decision not to identify the Land at Ifield Golf Course for development, a number of representations outlined that the area should be considered as the preferred option. It was suggested that the statement set out in paragraph 4.14 is misleading, and put forward that the golf course could easily accommodate the required 2,500 homes provided that other parcels of land surrounding the golf course are also utilised. It was also suggested that a new neighbourhood could be accommodated to the north east of Ifield West, integrating with Ifield West to provide much needed facilities whilst also offering protection from further development around Ifield Village and the surrounding areas. It was confirmed that the Golf Course land is owned outright by Ifield Golf Club Ltd and its shareholders, and emphasised that there is no legal requirement to provide any relocation of the golf course. As such it was suggested that the statements set out on pages 59 and 92 are misleading, and should therefore be removed.

Statement 13

The stance set out in Statement 13 was widely supported. Respondents considered that the Golf Course would not provide sufficient land for the development of a neighbourhood, with some concern expressed that the high landscape value greenfield land to the north and west of the site would consequently be required to replace the existing golf course. It was considered that the necessary work to complete any development on the Golf Course would be extremely disruptive and time-consuming, putting enormous pressure on Ifield residents. Further concern related to the potential impact of development in this location upon current road infrastructure, which was considered incapable of accommodating a significant increase in traffic. Concern was also expressed that development in this location could limit public access to existing countryside.

Land West of Ifield West

Support was expressed for the decision not to identify Land West of Ifield West as the preferred option. Particular attention was drawn to the high landscape quality of the area, and it was noted that the Historic Landscape Character Assessment of Sussex has recorded the area as containing cohesive assart fields. It was noted that the boundaries of these assart fields have value in their own right as elements of surviving medieval landscape, and suggested that paragraph 4.22 be amended to reflect this.

Statement 14

Again, support was expressed for the decision to identify west of Bewbush, rather than west of Ifield West, as the preferred option for development. It was noted that the west of Ifield West site includes areas of Ancient Woodland and a Site of Nature and Conservation Interest (SNCI), supporting a variety of flora and fauna. Respondents considered that further loss of ancient woodland and other ecologically sensitive habitats should be resisted, and it was emphasised that the area must be protected from development that would result in a loss or deterioration of these habitats.

Development between West of Bewbush and West of Ifield

Representations called upon the JAAP to recognise the likelihood of development at Crawley beyond the JAAP period. It was suggested that acknowledgement should be made to the significant risk that development west of Bewbush may fail to deliver the required 2,500 homes, and considered this risk remains significant to merit the development of a second neighbourhood west of Ifield in parallel to west of Bewbush. It was put forward that development options west of Ifield are not restricted to the three broad areas identified within the PO JAAP, and noted that some of the criticisms made regarding these areas can be resolved through adopting different area boundaries. As such, it was suggested that the area of land identified in Map 6 (golf course) should be extended north and west to allow for additional capacity to accommodate the target number of dwellings. It was also considered that development west of Ifield should not be resisted on the rationale that the requirement for a Western Relief Road may be triggered, particularly given the likelihood that such provision will feature in the town's future development in any case.

Statement 15

A single comment expressed support for the stance set out under Statement 15.

Strategic Employment Alternative Option

No comments were received in relation to the Strategic Employment Alternative Option chapter.

Statement 16

A single comment expressed support for the stance set out under Statement 16.

Alternative Land Uses

Some concern was raised in relation to the JAAP aspiration to provisionally reserve land west of the Holmbush Farm access for a potential substantial medical facility. It was considered that to allocate this area of land contradicts both the JAAP objective to avoid coalescence between settlements, and both Councils respective Core Strategies. As such, it was considered that any health facility should be sited entirely within the previously defined Area of Study.

Support was expressed for the provision of a University campus, which is set out as an economic objective under West Sussex Structure Plan Policy GAT4. It was put forward that the statement regarding the golf course set out within paragraph 4.43 is misleading, and outlined that there is no requirement to relocate the golf course were its current site to be chosen for development. Limited opposition was raised in relation to the provision of a traveller's site, with the respondent unconvinced that such provision is either wanted by gypsies and travellers, and concerned that such provision would do little to prevent unauthorised encampments.

A single response outlined that land to the north and south of Kilnwood Lane as suitable for residential development, and suggested that any relief road provision crossing the high ground surrounding Kilnwood Lane should be situated within a cutting.

Attention was drawn to the objectives set out under South East Plan Policy GAT4 to promote economic development, and it was suggested that the provision of a Combined Heat and Power (CHP) station would be integral to achieving this. It was also considered that such provision would contribute to reducing the carbon footprint within the sub-region through generating green electricity and heat to supply new and existing residential and commercial development west and north west of Crawley, including Gatwick Airport.

Statement 17

Support was expressed for the provision of a new medical facility to the west of Crawley, though it was outlined that quick and easy access from the north of Crawley and Gatwick would be required to ensure the facility is viable, and beneficial to all people in the area. In order to achieve this, it was considered that the provision of a full Western Relief Road between the A23 and A264 would be necessary. Respondents emphasised that

any new medical facility would need to be a full NHS hospital, whilst an individual responded considered that any new facility may necessitate the downgrading of the existing Princess Royal and Redhill Hospitals.

A number of representations identified Pease Pottage as the preferred location for a new medical facility, considering that good access from the M23 would allow the facility to cater for all regional accident and emergency cases, and act as the designated hospital for Gatwick Airport. It was noted that were Pease Pottage to be identified as the preferred location for a medical facility, or in the event that need for such provision no longer required, it was considered that the land currently allocated for medical provision could be used to accommodate the neighbourhood, thereby reducing the need to expand north of the railway line.

Some respondents considered the provision of a health facility to be unnecessary. Particular concern was expressed that a major new development beyond the new neighbourhood would effectively join Faygate and Crawley, significantly reducing the strategic gap between Horsham and Crawley. Further concern was expressed that any hospital provision would be private, and built to a low-cost specification with the intention to sell services to the NHS.

Chapter 5 - The Longer Term Approach

Whilst the decision to identify land west of Bewbush as the preferred option was welcomed, strong concern was expressed that that document creates further uncertainty to communities in the wider search area by suggesting that development may occur in the non-preferred locations over the longer term. It was considered that such an approach puts the future of the Area of Study in doubt, paving the way for planning blight, land speculation, and the potential degradation of buildings and the wider area. It was suggested that development should be contained within natural boundaries such as the A264 and railway line, whilst some responses outlined that any reference to further development, beyond the 2,500 dwellings west of Bewbush, should be removed from the JAAP.

It was considered that through stating Horsham District Council's opposition to a relief road, yet incorporating the first section of a WRR as part of the preferred option, the JAAP contains conflicting messages. Concern was again expressed that the construction of a WRR would facilitate further development within the Area of Study over the next twenty years, compounding the current climate of uncertainty. As such, it was considered that more should be done to allay local concerns, and representations emphasised that the Submission JAAP should remove any uncertainty.

It was suggested that in its present form, the JAAP does not consider the ultimate size of Crawley, effectively advocating its further expansion. Concern was expressed that development pressures in and around Crawley would continue, creating further demand for homes and placing increased pressure on Crawley's road network and green spaces. Concerns were expressed that should Crawley's expansion continue, the original new town principle would be disregarded, and the town's sense of community lost.

In general terms it was considered that a review of the JAAP by both Councils would be appropriate if, in the context of future planning in the wider area beyond 2018, further need is identified for development within the Area of Study. Whilst a review of the JAAP

was considered to be an appropriate policy approach, it was suggested that the Submission JAAP should adopt a different approach to the longer term. It was outlined that the document has established locations within the Area of Study with development capacity, and suggested that the Submission document should develop upon this to provide broad options for growth post 2018, which could be revisited when the JAAP is reviewed.

Mid Sussex District Council agreed that any allocation adjacent to Crawley, within Mid Sussex, should be considered in conjunction with adjoining authorities in the context of sub-regional requirements. It was however noted that the identification of Crabbet Park as a contingency location for strategic development post 2020 within the Mid Sussex Core Strategy would not preclude such consideration.

Some concern was expressed that the issues facing Ruser Parish, particularly regarding the protection of the strategic gap and avoidance of coalescence, may be neglected. As such, a commitment was sought from both Horsham District Council and Crawley Borough Council to recognise the strategic importance of the parish, and preserve it as a strategic gap, possibly through allocating it a special status such as Rural Conservation Area.

Statement 18

It was noted that were development pressures to continue, support a strategic survey of all possible sites around Crawley would be supported. It was emphasised that this should consider land to the east and south of the town, rather than just assuming that land to the west of Ifield is already 'lined up' for development.

Conclusions and Next Steps

No comments were received in relation to this chapter.

Appendix A

No comments were received in relation to Appendix A

Appendix B

The majority Principles of Development and Sustainability Objectives were broadly supported, though it was noted that the preferred options document does not take account of the cultural heritage assessments set out within the SA/SEA. The County Ecologist outlined that the list of SNCI's set out under SA/SEA table 15 is incomplete, and set out the full list of sites. Further suggested amendments to the SA/SEA document focussed upon the requirement for additional archaeological and historical landscape survey work, the need to refer to the surviving medieval landscape west of Ifield West, and the need to take account of, and mitigate for the impact of development on the historic and cultural landscape of the area. Comments also outlined the need to consider the sensitive nature of the site given its close proximity to the High Weald AONB, and it was suggested that reference should be made to the Landscape Character Assessment when considering the design and character of development. The need to conserve and enhance biodiversity was outlined, and it was considered that robust surveys would be necessary to ensure this occurs.

The view that land west of Bewbush should have the least damaging impact on the environment was supported by Natural England, provided that robust measures are put in place to ensure the protection and enhancement of the surrounding areas. It was however strongly advised that regard be given to the Natural Environment and Rural Communities Act (2006), which places a duty of care to conserve biodiversity.

Concern was expressed that the traffic impact of development upon Bewbush has not been taken into account.

Appendix C

Support was expressed for the JAAP objective to promote and enhance strong physical links between the new neighbourhood and adjoining countryside, and the Countryside Access Forum for West Sussex indicated they would be willing to work with both Councils, and West Sussex County Council, to review the condition and extent of existing Public Rights of Way, and identify any necessary improvements. Some disappointment was expressed that no reference is made to the access needs of equestrians.