

**West of Bewbush Joint Area Action Plan
Alternative Development Sites and Boundary Changes Document**

Regulation 33 Statement

The West of Bewbush Joint Area Action Plan Alternative Development Sites and Boundary Changes document identifies the proposed alternative sites and boundary changes that were submitted to the Councils at the Submission stage of the Joint Area Action Plan process.

Consultation was held on the Alternative Development Sites and Boundary Changes document for 6 weeks from 22nd August until 3rd October 2008.

For a representation to have been considered 'duly made' it firstly had to relate to a specific site or boundary change and could not be made against the document as a whole; secondly it needed to be either a support or an objection. When representations were submitted during the 6 week consultation period, but did not adhere to above criteria, they have been considered as comments rather than formal 'duly made' representations. Copies of these comments have been made available from the dedicated West of Crawley website.

The final number of 'duly made' representations was 105. The table overleaf identifies how many representations were made against each proposed alternative development site or boundary change and whether they were in support or objection.

The representations have been made available to the Inspector through the Programme Officer and will be considered at the Examination into the West of Bewbush Joint Area Action Plan Submission document.

WoB ADS	Sup.	Obj.	Total	Summary of Issues
1	0	8	8	<p>The site included land that was outside of the Area of Study, which, in turn, would threaten the integrity of the Strategic Gap. Because of the need to protect existing vegetation, such a boundary change would also result in a smaller developable area.</p> <p>Concern was expressed over the deliverability of ADS1, primarily due to the high costs associated with the remediation of the landfill area and that therefore, alternative non-residential uses would be more appropriate.</p> <p>Another key concern in relation to this site centred on the lack of access when compared to the superior multi-user access provisions of the West of Bewbush proposed allocation. However, should the same multi-user access routes and links be made available then ADS1 could, in principle, be supported.</p> <p>General issues raised included opposition to housing in general; concern over any increase in demand on infrastructure; and greater pollution resulting from a new neighbourhood.</p>
WoB ADS	Sup.	Obj.	Total	Summary of Issues
2	0	9	9	<p>There is no landscape justification to support such a boundary change that would deliver far less developable land and would threaten the delivery of the new neighbourhood.</p> <p>Conversely, concern was expressed over the deliverability of ADS2, primarily due to the high costs associated with the remediation of the landfill area and that therefore, alternative non-residential uses would be more appropriate.</p> <p>Furthermore, development could have a significant impact upon adjacent SSSI, the Strategic Gap and the High Weald.</p> <p>Another key concern in relation to this site centred on the lack of access when compared to the superior multi-user access provisions of the West of Bewbush proposed allocation. However, should the same multi-user access routes and links be made available then ADS2 could, in principle, be supported.</p> <p>General issues raised included opposition to housing in general; concern over any increase in demand on infrastructure; and greater pollution resulting from a new neighbourhood.</p>
WoB ADS	Sup.	Obj.	Total	Summary of Issues
3	3	7	10	<p>Support was expressed for ADS3 as the location would support such a proposal due to its previous use and particularly in transport terms, especially if there were to be a western relief road but noting a train station would not be an essential</p>

				<p>requirement.</p> <p>The County Council would not hinder such a proposal provided that the strategic housing could still be delivered in the area, that this was shown to be the best site and that the local health care provider supported the need.</p> <p>Objection arose to the site due to lack of support from West Sussex Primary Care Trust and following earlier consultation on the document. There does not appear to be any transport evidence base to support the proposal and such a proposal would be detrimental to any new access routes and links.</p> <p>It was suggested that if the need arose, future Core Strategy Reviews would be the appropriate arena to assess a strategic location for a new hospital.</p>
WoB ADS	Sup.	Obj.	Total	Summary of Issues
4	1	11	12	<p>The County Council expressed support for the provision of a built waste management facility and the principle of an allocation with its associated certainty. However, further work would be necessary to determine whether this was the best location for a CHP scheme and MT plant or whether a waste facility could be incorporated on the area shown for a CHP plant on the Conceptual Masterplan.</p> <p>Whilst the principle of CHP was generally supported, objection was raised to the nature of ADS4 and the lack of evidence to support the western relief road element of the proposal. It was noted though that such a proposal could trigger the need for a relief road and any subsequent environmental impacts. Further concern was raised over issues of blight for both existing and proposed residential development.</p> <p>Doubt was also raised over the policy conformity for such a proposal as it included land outside of the Area of Study and it was suggested that such a proposal was outside the remit of the JAAP.</p> <p>It was suggested that such a proposal would severely compromise the Strategic Gap and the AONB to the south of the A264 and that it would be detrimental to the multi-user access proposed for the site.</p> <p>In the longer term, it was considered that the Core Strategy Reviews and the County Minerals and Waste Strategies would be the appropriate platforms on which to assess such proposals.</p>

WoB ADS	Sup.	Obj.	Total	Summary of Issues
5	2	9	11	<p>There was support for this site as a contingency, should West of Bewbush be undeliverable or delayed. The site could complete lfield West and address current deficiencies in facilities in the western neighbourhoods. Whilst a western relief road would ultimately be necessary, in the short term a link road to the A23 south of Gatwick was suggested.</p> <p>Objection was raised over lack of evidence to support the allocation of the site and this particularly focussed on the ownership of the land, which appeared to mean that the land could only be considered as a medium/long term development option. The issue of potentially relocating the golf course was also raised.</p> <p>There was concern over the absence of a formal transport assessment for the proposal and that it could not provide improvements of equal importance for multi-use countryside access as the West of Bewbush location.</p> <p>Furthermore, it was considered there could be a negative impact on the High Weald and flood plains to the north.</p> <p>General issues raised included opposition to housing in general; concern over any increase in demand on infrastructure, particularly in relation to lfield West; and greater pollution resulting from a new neighbourhood.</p>
WoB ADS	Sup.	Obj.	Total	Summary of Issues
6	3	8	11	<p>Support was expressed for this site as it had previously been identified by HDC as their Preferred Option within the Core Strategy and SA/SEA work had been carried out. Furthermore, this site would integrate with and complete lfield West and address current deficiencies in facilities in the western neighbourhoods. It was also put forward that there was no requirement to provide compensation or relocate the golf course.</p> <p>Objection was raised over lack of evidence to support the allocation of the site and that there was no indication that a developer was ready to complete development by 2018. Concern also particularly focussed on the ownership of the land, which appeared to mean that the land could only be considered as a medium/long term development option. The issue of potentially relocating the golf course was also raised.</p> <p>There was concern over the absence of a formal transport assessment for the proposal and that it could not provide improvements of equal importance for multi-use countryside access as the West of Bewbush location.</p>

				<p>Furthermore, it was considered there could be a negative impact on the High Weald and flood plains to the north.</p> <p>General issues raised included opposition to housing in general; concern over any increase in demand on infrastructure, particularly in relation to Ifield West; and greater pollution resulting from a new neighbourhood.</p>
WoB ADS	Sup.	Obj.	Total	Summary of Issues
7	2	9	13	<p>Support was expressed for this site as it had previously been identified by HDC as their Preferred Option within the Core Strategy and SA/SEA work had been carried out. Furthermore, this site would integrate with and complete Ifield West and address current deficiencies in facilities in the western neighbourhoods. It is also free of environmental and historical constraints and would be more viable than the West of Bewbush which would allow for the maximum level of affordable social rented housing to be provided.</p> <p>The site also benefits from proximity to existing and future employment and would offer sustainable public transport opportunities and access to the countryside. There was, however, disagreement over whether development in this location would precipitate the need for a relief road.</p> <p>It was put forward that development would safeguard Ifield Village and Ifield Brook Meadow and the sensitive Strategic Gap. Furthermore, the brownfield golf course site is outside of the River Mole floodplain and noise contour areas of Gatwick Airport.</p> <p>It was also suggested that there was no legal basis for not being able to develop the Golf Course land prior to 2022 and therefore the Councils had been influenced by inaccurate information.</p> <p>Objection was raised over lack of evidence to support the allocation of the site and that there was no indication that a developer was ready to complete development by 2018. Concern also particularly focussed on the ownership of the land, which appeared to mean that the land could only be considered as a medium/long term development option. The issue of potentially relocating the golf course was also raised.</p> <p>There was concern over the absence of a formal transport assessment for the proposal and that it could not provide improvements of equal importance for multi-use countryside access as the West of Bewbush location. General transport concerns were also raised relating to the negative impacts of a provision of a relief road and also the potential for rat-running in the western neighbourhoods.</p>

				<p>Parts of Hyde Hill SNCI are within the proposal and as such a strategic ecological and landscape objection was lodged until further information was known.</p> <p>There was concern over the absence of a formal transport assessment for the proposal and that it could not provide improvements of equal importance for multi-use countryside access as the West of Bewbush location.</p> <p>Furthermore, it was considered there could be a negative impact on the High Weald and flood plains to the north.</p> <p>General issues raised included opposition to housing in general; concern over any increase in demand on infrastructure, particularly in relation to Ifield West; and greater pollution resulting from a new neighbourhood.</p> <p>An amendment was sought to the boundary of ADS7, due to the inclusion of English Partnerships' land. English Partnerships clarified that whilst it is not actively promoting its land it would not object to its allocation as part of a more comprehensive development.</p>
WoB ADS	Sup.	Obj.	Total	Summary of Issues
8a	2	11	13	<p>Support was expressed for the site as long as the area around Ifield Village Conservation Area and Ifield Brook Meadow were excluded. English Partnerships clarified that whilst it is not actively promoting its land it would not object to its allocation as part of a more comprehensive development.</p> <p>Objection was raised to the site as it was neither as sustainable or appropriate as the West of Ifield, which would meet the requirement of delivering a single neighbourhood. Questions were also raised over the short/medium term deliverability of the site, due to only partial control of the land.</p> <p>Furthermore, it was contended that the proposal is not supported by an up to date or adequate evidence base, particularly highlighting the lack of a clear delivery mechanism, housing trajectory, phasing plan, appropriate SA/SEA and masterplanning detail. Concern was also raised in relation to transport, questioning several aspects of the proposal's Transport Review and the practicality of the proposed public transport solutions. General transport concerns were also raised relating to the negative impacts of a provision of a relief road, the potential for rat-running in the western neighbourhoods, the absence of a formal transport assessment for the proposal and that it could not provide improvements of equal importance for multi-use countryside access as the West of Bewbush location.</p>

				<p>It was suggested the site has a greater flood risk than the West of Bewbush and that the Environment Agency propose flood attenuation measures in the area which would act as a constraint. The issue of aircraft noise was also raised as a constraint.</p> <p>Parts of Ifield Brook Wood SNCI are within the proposal and as such a strategic ecological and landscape objection was lodged until further information was known. Similarly, concern was raised over the impact on Ifield Village Conservation Area and the surrounding area.</p> <p>General issues raised included opposition to housing in general; concern over any increase in demand on infrastructure, particularly in relation to Ifield West; and greater pollution resulting from a new neighbourhood.</p>
WoB ADS	Sup.	Obj.	Total	Summary of Issues
8b	1	9	10	<p>Support was expressed for this proposal as it would utilise brownfield land and, in bringing forward a western relief road, would relieve congestion, drastically reduce rat-running and provide direct road links to employment areas.</p> <p>Furthermore, this site would integrate with and complete Ifield West and address current deficiencies in facilities in the western neighbourhoods. It is also free of environmental and historical constraints and would be more viable than the West of Bewbush which would allow for the maximum level of affordable social rented housing to be provided.</p> <p>The site also benefits from proximity to existing and future employment and would offer sustainable public transport opportunities and access to the countryside.</p> <p>It was also suggested that there was no legal basis for not being able to develop the Golf Course land prior to 2022 and therefore the Councils had been influenced by inaccurate information.</p> <p>Objection was raised over lack of evidence to support the allocation of the site and that there was no indication that a developer was ready to complete development by 2018. Concern also particularly focussed on the ownership of the land, which appeared to mean that the land could only be considered as a medium/long term development option. The issue of potentially relocating the golf course was also raised.</p> <p>Furthermore, it was contended that the proposal is not supported by an up to date or adequate evidence base, particularly highlighting the lack of a clear delivery mechanism, housing trajectory, phasing plan, appropriate SA/SEA, masterplanning detail and a full Transport Assessment.</p>

				<p>It was also put forward that the site could not provide improvements of equal importance for multi-use countryside access as the West of Bewbush location.</p> <p>General issues raised included opposition to housing in general; concern over any increase in demand on infrastructure, particularly in relation to lfield West; and greater pollution resulting from a new neighbourhood.</p>
WoB ADS	Sup.	Obj.	Total	Summary of Issues
9	0	8	8	<p>Objection was raised over lack of evidence to support the allocation of the site; it was put forward that this site would be insufficient to accommodate 2,500 dwellings and it is too far away from the West of Bewbush site to be considered appropriate for contingency. Concern was also expressed over the absence of a formal transport assessment for the proposal and that it could not provide improvements of equal importance for multi-use countryside access as the West of Bewbush location.</p> <p>Furthermore, it was considered there could be a negative impact on the High Weald and flood plain and that it would be impacted upon by existing noise levels from Gatwick. Indeed, this site is within the safeguarded for the potential expansion of the Airport.</p> <p>General issues raised included opposition to housing in general; concern over any increase in demand on infrastructure; and greater pollution resulting from a new neighbourhood.</p>