



**Horsham
District
Council**



**HORSHAM DISTRICT AND CRAWLEY BOROUGH
LOCAL DEVELOPMENT FRAMEWORKS**

NON-TECHNICAL SUMMARY OF THE Sustainability Appraisal and Strategic Environmental Assessment

Report on the adopted
West of Bewbush
Joint Area Action Plan
(2009)

July 2009

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NON-TECHNICAL SUMMARY

It is a requirement that Local Authorities produce documents which set out the strategy for land use planning within their area. As part of this process, both Horsham District and Crawley Borough Council have identified land to the West of Bewbush as a location for development. The two Councils have jointly produced a Joint Area Action Plan (JAAP) that sets out more detail on the requirements for this development.

During the preparation of the Joint Area Action Plan, a process known as Sustainability Appraisal/ Strategic Environmental Assessment (SA/SEA) was undertaken. This process measured how well the document contributes to sustainable development, (enabling change in order to meet the needs of today, without compromising those of future generations) and made suggestions as to how the sustainability of the document could be improved. This report summarises the results of this process.

Background Research and Sustainability Objectives

The sustainability appraisal process began with the identification of other documents and plans that would have an impact on development in the West of Bewbush area. This includes guidance set out in Government Planning Policy Statements, and more local publications such as the Ifield Village Conservation Area Statement.

The next stage in the process was to collect information about the area around the West of Bewbush as it is today. Data was collected on a range of subjects, including population numbers, the landscape and biodiversity and the local economy.

The background documents and data enabled sustainability issues for the West of Bewbush area to be identified. From these “sustainability objectives” were developed, against which the Joint Area Action Plan was measured to test its contribution to sustainable development. The sustainability objectives are as follows:

1. To ensure that everyone has access to a good quality affordable home that meets their needs.
2. To ensure that everyone has access to the health, education, leisure and recreation facilities that they require.
3. To reduce crime, the fear of crime and antisocial behaviour.
4. To maintain and enhance landscape character, including the setting of Crawley, and protection of links from the town to the surrounding countryside.
5. To conserve and enhance the biodiversity within Crawley and the surrounding countryside.
6. To conserve and enhance the historic and cultural environment, including important green spaces.
7. To reduce the risk of flooding
8. To maintain and where possible enhance, levels of water quality.
9. To maintain and where possible enhance, levels of air quality.
10. To minimise the impact of noise on residents and the wider environment.
11. To minimise the use of resources, particularly water, energy and materials.
12. To seek to reduce the emission of greenhouse gases, in particularly by encouraging the provision and use of renewable energy.
13. To make the most efficient use of land.
14. To reduce car journeys and promote alternative methods of transport.
15. To ensure that development maintains, support and promote a diverse employment base to serve the local and sub-regional economy.
16. To ensure development contributes to maintaining and enhancing the vitality and viability of the neighbourhood and Crawley town centre.

Assessment of Options for the Joint Area Action Plan

Whilst preparing the West of Bewbush Joint Area Action Plan, a number of different options were considered. For example, there were several possible locations where development could be sited, and different ways of accessing the development in terms of road layout and provision. Also considered were a number of other different land-uses other than residential development that could be located in the West / North West of Crawley area.

The different options for the Joint Area Action Plan were tested against the sustainability objectives using a series of matrices to compare the effects of different options. From this it was possible to identify the most sustainable options, which was used to help inform the options selected for inclusion in the Joint Area Action Plan. A summary of the results of the sustainability appraisal of the options is set out in table 1 below.

Table 1

Development Options	Summary of Findings
<p><u>Location of the neighbourhood</u></p> <p>a) Should the development be a single new neighbourhood located to the West of Bewbush?</p> <p>b) Should the development be a single new neighbourhood located to the West of Ifield?</p> <p>c) Should the development of a new neighbourhood be split between the two areas and be located partially West of Bewbush and partially West of Ifield?</p> <p>d) Taking into account the likely need for more housing development in the longer term (as set out in the draft Regional Spatial Strategy), should two new neighbourhoods be developed - one the West of Bewbush and one West of Ifield?</p>	<p>Any development to the west of Crawley will have adverse effects on the surrounding landscape, biodiversity and flood risk. Option d would have the largest negative effect due to the scale of the development. Option c would also have a relatively large negative effect on the environment, as there would be development in both locations. Option c would also limit provision and access to services and facilities as these would be divided across two sites. Of the remaining two options, a) development at Bewbush was considered to be less environmentally damaging as it would involve development of a brownfield landfill site, and development West of Ifield would impact upon Ifield Village Conservation Area, and the high quality landscape in the area. Option a) has therefore been chosen as the most sustainable option.</p>
<p><u>New Road and Sustainable Transport Provision</u></p> <p><i>New Road provision</i></p> <p>a) Should no new roads be provided other than for direct access to the new development?</p> <p>b) Should a link road be provided to the development from the A23?</p> <p>c) Should a link road be provided to the development from the A264?</p> <p>d) Should a relief road be provided, linking the A264 to the A23?</p>	<p>The construction of any new road around the western edge of Crawley will have an adverse impact on the landscape and biodiversity creating a hard boundary between the town and the countryside and severing habitats. Other impacts include noise and worsening air quality. This effect would be greatest with option d) the relief road. Option a) was therefore selected as the most sustainable option</p>

Development Options	Summary of Findings
<p><i>Park and Ride</i></p> <ul style="list-style-type: none"> a) Do not provide a new park and ride facility b) Do not provide a park and ride facility, but within the new neighbourhood West of Bewbush, provide parking in conjunction with a new railway station c) Provide a park and ride facility away from the new neighbourhood <ul style="list-style-type: none"> i) West of Ifield ii) North West of Crawley 	<p>The provision of a park and ride site will have a mixture of positive and negative effects, the balance of which varies depending upon its exact location. In general however, a park and ride facility would reduce congestion on roads between the site and the centre of Crawley.</p> <p>By reducing congestion, a park and ride site would also assist in improving air quality in the area. A park and ride site would however potentially be damaging to the landscape and environment, particularly if sited to West of Ifield.</p> <p>On balance, option b) is considered to be the most sustainable, as it would be linked to the new development location, which is partly on brownfield land, and would maximise the positive effects of the provision of such a site.</p>
<p><u>Employment Provision</u></p> <ul style="list-style-type: none"> a) Should employment land be provided as part of a new neighbourhood centre only? b) Should employment land be provided in a neighbourhood centre, with some additional provision elsewhere within the development to meet wider employment needs of the new residents? c) In addition to employment land provided as part of a neighbourhood, should a strategic employment site be provided, and if so should it be located <ul style="list-style-type: none"> i) West of Bewbush ii) West of Ifield iii) North West of Crawley? 	<p>The assessment found that provision of employment at a neighbourhood level was more sustainable than provision of further strategic employment land, which would have further negative effects on the landscape and environment, (especially on land to the West of Ifield), in addition to the provision of a new neighbourhood. Furthermore, the allocation of strategic employment land is not considered necessary as the need is being met from redevelopment of existing employment land.</p> <p>Of options a and b, it was found to be more sustainable to provide a range of employment types in different locations, as this would better meet the needs of new residents of the neighbourhood. Option b was therefore selected as the most sustainable option</p>
<p><u>Alternative Land Uses</u></p> <p><i>1) Cemetery Provision</i></p> <ul style="list-style-type: none"> a) Make land available for a cemetery, either i) West of Bewbush ii) West of Ifield or iii) North West of Crawley b) Do not make provision for a cemetery 	<p>The provision of land for a cemetery has a potentially positive effect in meeting a specific community need. If incorporated into a neighbourhood development [option a),i)] it could provide an area of greenspace with positive impacts on biodiversity and air quality. Location of a site outside the neighbourhood would have a negative effect, altering the landscape and generating car journeys to an otherwise rural location.</p> <p>Option b – not providing a cemetery – would not generate negative landscape impacts, but could generate problems in not meeting an identified need and placing pressure on existing burial sites in Crawley.</p> <p>Option b) has been selected as the new development is not considered to generate sufficient pressure on existing provision to warrant the allocation of a new site.</p>

Development Options	Summary of Findings
<p>2) <i>Gypsies, Travellers and Travelling Show People</i></p> <p>a) Make land available for gypsies, travellers and travelling show people i) West of Bewbush ii) West of Ifield or iii) North West of Crawley</p> <p>b) Make land available for a gypsy, traveller and travelling show people site if needed as part of a further DPD on this matter</p> <p>c) Do not make land available for a gypsy, traveller and travelling show people</p>	<p>There is a need to provide sites for gypsies and travellers, to help provide for this section of the community. However, the allocation of such a site will have negative effects on the environment, for example changing the landscape, and damaging biodiversity (particularly if the site were located to the West of Ifield). Non provision of a gypsy site (option c) would however also have negative effects, as it could lead to unauthorised encampments that may be more damaging to the environment over one that has been allocated.</p> <p>At this stage, there are still uncertainties¹ as to the overall need for gypsies and travellers in the area, and allocation at this stage would prejudice the plan led approach through the Regional Spatial Strategy. Option b) has therefore been selected.</p>
<p>3) <i>Substantial Medical Health Facility</i></p> <p>a) Make land available in the JAAP for a substantial medical facility i) West of Bewbush ii) West of Ifield or iii) North West of Crawley</p> <p>b) Do not make land available for a substantial medical facility in the JAAP area</p>	<p>The allocation of land for a substantial medical facility would have a significant positive effect in helping access to health care for residents in the area. Construction of such a facility would however have negative effects on a range of issues, from the landscape, biodiversity and the road network. The sensitive countryside west of Ifield would be particularly at risk from such a development. Of the two remaining locations, development west of Bewbush is likely to have a more positive effect as it is more accessible to residents in the wider sub-region (e.g. Horsham). Option a)i) was therefore assessed as being the most sustainable option</p>
<p>4) <i>Sewage Treatment Facilities</i></p> <p>a) Make land available in the JAAP for a new sewage treatment works i) West of Bewbush ii) West of Ifield or iii) North West of Crawley</p> <p>b) Do not prejudice the upgrading or extension of the existing sewage treatment facilities (but do not allocate land for this purpose in the JAAP)</p>	<p>Beyond 2012, the existing sewage treatment works need to be upgraded or relocated to accommodate new development. An extension of the existing site would be the least environmentally damaging option, requiring less land-take, and fewer resources during the construction phase. The land is also lower in landscape quality and in a location where odour issues are minimised. It is therefore considered that the JAAP should not prejudice any extension to the existing sewage works, and option b was therefore selected as the most sustainable option.</p>
<p>5) <i>Strategic Open Space</i></p> <p>a) In addition to formal and informal open space within the new neighbourhood make land available for Strategic Open Space i) West of Bewbush ii) West of Ifield or iii) North West of Crawley</p> <p>b) Provide only formal and informal open space within the new neighbourhood</p>	<p>Provision of strategic open space will assist in the provision of recreational facilities, and provide a link between the town and wider rural area. Open space located west of Ifield would help conserve and enhance the setting of the conservation area. A site north west of Crawley would have less benefit, as it is further from most residents and heavily affected by aircraft noise. Strategic open space could however harm biodiversity by increasing pressure on nearby protected sites. Although options a i) and ii) are most sustainable, option b has been selected as it is felt to be more achievable to focus on open space within the new development.</p>

Assessment of the chosen option West of Bewbush

Once the preliminary options for the Joint Area plan had been assessed and selected, a more detailed appraisal of the chosen site for development (West of Bewbush) was carried out. This assessment looked at shorter and longer term impacts on sustainability, and identified measures to help improve the sustainability of the plan. The results of this process are summarised in table two. The key for the table is as follows:

Strong positive effect:	☺☺
Positive effect:	☺
No Effect / Not applicable:	☹
Negative effect:	☹
Strong negative effect :	☹☹
Effect uncertain	?

Table 2

SA/SEA Objective	Summary of Effects	Overall Impact
1. To ensure everyone has access to a good quality affordable home that meets their needs	Development will provide approximately 2,500 homes, of which up to 40% will be affordable. The houses will also be a mixture of sizes to help meet a range of needs. The positive effect of the development on this objective will increase over time as more dwellings are completed. There is potential for the long term needs of the population to be met through careful design of the development; for example the provision of lifetime homes.	☺☺
2. To ensure everyone has access to the health, education, leisure and recreation facilities they require	The Horsham and Crawley Core Policies for West of Crawley set out the need to provide sufficient facilities to meet needs of the new residents. This provision could assist other western neighbourhoods (Ifield West) which currently lack access to facilities. Provision of facilities is likely to increase over time as more of the development is completed.	☺☺
3. To reduce crime, the fear of crime and antisocial behaviour	The land west of Bewbush is currently undeveloped, and as a consequence, the creation of a new neighbourhood is likely to result in some increase in crime over the existing level, although it is difficult to predict what future crime levels may be like. Notwithstanding this, the potential for crime can be minimised by following specific design codes set out by the police. Providing these codes are used, the overall effect of the development on crime and antisocial behaviour is likely to be minimal.	☹
4. To maintain and enhance landscape character including the setting of Crawley and protection of links from the town to the surrounding countryside	In terms of landscape quality, Land West of Bewbush is the least sensitive site in the west of Crawley area. Although development of the site effectively narrows the Strategic Gap between Horsham and Crawley, the land is well screened from the surrounding countryside, and the visual impact of the development is likely to be limited. Furthermore 30% of the site is previously developed land rather than undeveloped countryside. Development of the site also presents opportunities to enhance links to the countryside and the nearby AONB. On balance it is considered that, providing mitigation measures such as advance planting is undertaken, the effect of the development is neutral to positive.	☺

SA/SEA Objective	Summary of Effects	Overall Impact
5. To conserve and enhance biodiversity within Crawley and the surrounding countryside	At the current time, the land west of Bewbush is not considered to be of particular importance for biodiversity, although development of the landfill site will result in a loss of land for certain birds that have been recorded as breeding on the site. It should however be noted that the restoration of the site to agriculture would also have this effect by changing the habitat on the land. Development could also impact on biodiversity in the short term, for example if construction sediments reach watercourses and damage water quality. In the longer term, there is also the potential for higher numbers of residents in the area to increase pressure on biodiversity through increased recreational pressure on the surrounding landscape. The effect of this is however thought to be relatively minimal. Development west of Bewbush also presents an opportunity to enhance biodiversity in the longer term through the provision of urban greenspace, and wildlife features within the development.	☹️
6. To conserve and enhance the historic and cultural environment, including important green spaces	The initial Sustainability Appraisal raised uncertainty as to the effect of the development on cultural heritage, in particular because of the potential sensitivity of Kilnwood 'historical parkscape'. A study undertaken in 2008 however, demonstrated that there is no evidence of a designed landscape at the site, although there are several specimen trees that pre-date the landscape that should be retained where possible. There is also the possibility that increased recreation pressure arising from the development could also impact on the moat in Bewbush, which is a scheduled ancient monuments. Development does however have potential to improve greenspaces and links to the AONB.	😊
7. To reduce the risk of flooding	Without mitigation, development on the site could significantly increase the risk of flooding, for example as a result of clay lining Bewbush Brook and re-profiling of the landfill site, as well as from increased rates of run-off to streams as a result of hard surfaces such as concrete. A strategic flood risk assessment has been undertaken for the area, and providing that the mitigation measures set out in this document are followed, the development will not alter the risk of flooding from that of a greenfield site. These measures will need to be implemented from the construction phase of the development.	☹️
8. To maintain and where possible enhance water quality levels	At the current time, there is potential for water quality to be adversely affected by leachate from the landfill site, although levels are likely to be very limited. Remediation of the landfill site will however mitigate this. This would result in a positive impact on water quality in the longer term. In the short term however, construction may have a negative impact on water quality – with mud and sediment from earth works having the potential to enter nearby watercourses.	☹️?(short term) 😊?(long term)

SA/SEA Objective	Summary of Effects	Overall Impact
9. To maintain and where possible enhance levels of air quality	Development will inevitably result in some increase in traffic, both during the construction and operational phases of development. This will have an adverse impact on air quality in the area to some extent, although the overall effect is likely to be relatively limited, both in the short term where construction effects (which could also include dust and particulates) are temporary, and also in the longer term if mitigation measures in reducing traffic levels are successful.	☹
10. To minimise the impact of noise on residents and the wider environment	The greatest impact of noise on the site is from the A264 and the railway, rather than from aircraft at Gatwick airport. Development will generate some noise during the construction phase, although this is temporary effect, but could affect residents of Bewbush and properties on the site which are completed in an early phase of the development. Controlling hours of working will help mitigate this. The completed development may also create noise, but this would be at normal domestic levels and not therefore significant for other residents or the wider environment. The impact of noise from rail and roads on the new residents can be mitigated by screening / bunding and the impact is therefore likely to be neutral in the longer term.	☺
11. To minimise the use of resources, particularly water, energy and materials	Development will require the use of resources during both the construction and operational phases. The construction phase will require raw materials e.g. for roads and buildings, whilst the operational phase of the development will mainly require resources such as energy and water. Without mitigation, this would have a large negative effect, but there is an opportunity to minimise this, encouraging buildings to be built to high standards, such as those set out in the Code for Sustainable Homes.	☹
12. To reduce the emission of greenhouse gases, in particular by encouraging the provision and use of renewable energy	Development will result in greenhouse gas emissions during the construction and operational phases of development, for example as a result of vehicle movements and the energy involved in production of construction materials (e.g. concrete). In the longer term there is the potential for the development to produce more limited amounts of carbon dioxide e.g. through provision of a CHP plant and other renewable sources of energy. It is however likely that the development will produce some greenhouse gas emissions resulting in an overall negative effect.	☹
13. To make the most efficient use of land	30% of the west of Bewbush site comprises brownfield land, rather than being a development of a wholly greenfield site. Housing densities will be a minimum of 35 dwellings per hectare, but this may be greater in some parts of the development, for example the land at the eastern side of the development area, which adjoins Bewbush, which is already fairly densely developed.	☺

SA/SEA Objective	Summary of Effects	Overall Impact
14. To reduce car journeys and promote alternative methods of transport	Development west of Bewbush will inevitably result in some increase in traffic, as many residents of the area will own and use cars. However the lack of a new relief road will limit a major increase in traffic levels. There is also the potential for commuter traffic to be drawn into the area to reach any new station that is provided. This could create congestion in the new neighbourhood. The masterplan for the west of Bewbush area will promote alternative forms of transport, which will help to mitigate any negative effects. Any increase in traffic is likely to occur in the medium to longer term as greater numbers of houses are completed and occupied.	☹
15. To ensure development maintains, supports and promotes a diverse employment base to serve the local and sub-regional economy	The development west of Bewbush will provide some employment opportunities to serve the local neighbourhood economy. The development will also provide a residential base for those employed in the wider sub-region. These positive effects will increase over time as more dwellings are completed and occupied.	☺
16. To ensure development contributes to maintaining and enhancing the vitality and viability of the neighbourhood and Crawley town centre.	Development will provide a new neighbourhood parade / high street thus maintaining the viability and vitality of the neighbourhood. New residents in the area will also contribute to helping to maintain the economic vitality of Crawley town centre. The positive effect on the retail economy of both the neighbourhood and Crawley town centre will increase over time as more dwellings are completed and occupied.	☺

Cumulative Effects

In addition to the assessment of the effects of development on each individual objective, there may be other wider consequences arising from the development. These 'cumulative effects' can arise when a number of different effects combine to have a greater positive or negative impact than they may do on their own. The main cumulative effects of the development that have been identified are set out below.

- Providing high quality public transport may increase rates of public transport use in the wider area
- The positive effect that the development will have on retail and employment will combine to have a greater positive effect on the local and sub-regional economy than they do in isolation.
- There is the potential for the development west of Bewbush to increase the likelihood of further development in the area in the future, (although the need for and allocation of any land for future development in the area will be a matter for any future reviews of the Horsham and Crawley Core Strategies). Any further development in the area would have a greater impact on the surrounding landscape, environment and the road network than development of one neighbourhood.
- Activities that arise as a result of the development such as heating of buildings, together with any increases in traffic or congestion may combine to have a greater effect on climate change.
- Development has the potential to increase the risk of flooding upstream as well as on the site itself.

- Increased levels of sewage effluent and polluted run-off from roads could combine to decrease the water quality of any nearby watercourses.
- Negative effects on water quality, air quality and the impact on climate change could combine to have an adverse effect on biodiversity.
- Although development will provide a number of services and facilities which will provide for the immediate needs of new residents, pressure may be placed on larger more regional facilities such as hospitals, which may also have to cater for new residents from other new developments in the wider area.

Mitigation Measures

In order to offset the negative effects of development that have been identified, a number of mitigation measures have been suggested and incorporated into the Joint Area Action Plan. These are as follows:

Sustainability Matter	Suggested Mitigation Measure	Mitigation measures incorporated into the JAAP
Housing	In general the JAAP is positive in terms of meeting housing needs in the area. However, to ensure that the development meets the needs of the community in the longer term, the JAAP needs to highlight the importance of designing the development to ensure that the needs of residents are met over a number of years (e.g. lifetime home standards).	JAAP outlines the need for a range of house sizes and types to meet needs. Greater emphasis on meeting a wide range of residents needs as part of any affordable housing is set out, including a requirement in Policy WB11 for approximately 20% of these homes to be built to Lifetime-Homes standards.
Crime	The Masterplan should highlight the need for good design of the development in order to ensure that the potential for crime is minimised.	Paragraph 4.4 highlights the need for good design in order to minimise the potential for crime. In addition, the text sets out the requirement for a design and access statement that may assist when considering the issue of crime.
Landscape Character	Adverse effects on the landscape can be minimised by a requirement to undertake advance planting in order to ensure that by the time development takes place it is screened from the surrounding countryside. Further details as to the location and type of landscape features could be identified as part of an Environmental Impact Assessment (EIA) to accompany any planning application.	Supporting text highlights the need for advance planting, re-enforcing the requirements for landscaping in Policy WB12.

Sustainability Matter	Suggested Mitigation Measure	Mitigation measures incorporated into the JAAP
Biodiversity	<p>The JAAP should emphasise the opportunity that development of the site presents to enhance biodiversity, e.g. through the provision of green space which can act as a wildlife corridor, incorporation of wildlife features such as nest boxes into the development. New planting should also be with species that maximise biodiversity. The detail of these features could be identified an EIA, which would accompany any planning application for the development.</p>	<p>Policy WB13 sets out the need to carry out biodiversity surveys prior to development. The supporting text also highlights the need to protect existing nearby nature conservation and woodlands designations. The supporting text also outlines the potential for enhancements to biodiversity – e.g. provision of bat boxes.</p>
Cultural Heritage and Green Spaces	<p>It was suggested that if not completed prior to the submission of the JAAP, the document should set out the need to undertake an assessment of Kilnwood archaeological parkscape.</p> <p>The masterplan should also identify potential green linkages including those to the AONB. Impacts on cultural features such as Bewbush moat should also be considered.</p>	<p>The assessment of the Kilnwood ‘historic parkscape’ was undertaken in 2008, which revealed that further protection of the land (bar some significant trees) would not be necessary.</p> <p>Policy WB14 requires the development to provide links to green spaces beyond the development boundary</p> <p>References in the supporting text are also made to Bewbush moat.</p>
Flooding	<p>The masterplan will need to ensure that no land uses sensitive to flooding are placed in the flood plain identified in the SFRA. To prevent the risk of flooding downstream the JAAP will need to set out the requirement for Sustainable drainage systems as appropriate. A Site Flood Risk Assessment as part of any planning application will also be necessary, for example to assess the impact that re-profiling of the former landfill site will have on drainage. It is suggested that the results from this work, together with any further mitigation measures are set out in an Environmental Impact Assessment.</p>	<p>The suggested mitigation measures are addressed in Policy WB16 and supporting text</p>
Water Quality	<p>Development will require remediation of the landfill site, which may improve water quality. Other measures to ensure that water quality is not adversely affected will be required to prevent pollution from construction and new roads. These measures could be specified as part of conditions on granting of any planning application.</p>	<p>Document includes policy WB21 on the need to remediate the landfill site. Other water quality issues can be addressed at the planning application stage.</p>

Sustainability Matter	Suggested Mitigation Measure	Mitigation measures incorporated into the JAAP
Air Quality	Any adverse impact on climate change can be mitigated by the presence of good public transport links and cycle and pedestrian access. The need for this was recognised in both the Horsham and Crawley Core strategies and more detailed information will need to be set out in the masterplan.	Detailed information regarding sustainable transport is set out in the JAAP under the transport section, and in particular WB25.
Noise	Development will need to be designed to minimise the impact of road and rail noise on residents. This can be achieved by bunding and planting, but the exact types and locations are matters for more detailed work to inform a planning application. Planning conditions could also minimise the impact of noise on nearby residents by controlling the hours of working on the site.	Policy WB15 seeks to ensure development will not be subject to noise levels greater than 60dBA.
Resource Use and Climate Change	The JAAP will set out the importance of the development meeting the highest possible sustainability standards such as those set out in the Government's Code for Sustainable Homes. The JAAP should also highlight the potential for low carbon energy systems such as a combined heat and power plant and for non residential buildings to be built to BREEAM standard of "very good" or above where possible. Good public transport measures will also help to mitigate against climate change.	WB21 sets out the need to devise an energy strategy to assist carbon emissions reductions. A water strategy to minimise rates of water use is also required. Where feasible and viable homes should be built to the highest standards set out in the Code for Sustainable Homes.