



Report to Horsham District Council and Crawley Borough Council

by David Vickery DipT&CP MRTPI

**An Inspector appointed by the Secretary of
State for Communities and Local Government**

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Date: 9th April 2009

Planning and Compulsory Purchase Act 2004
Section 20

REPORT ON THE EXAMINATION INTO THE WEST OF BEWBUSH JOINT AREA ACTION PLAN DEVELOPMENT PLAN DOCUMENT

Document submitted for examination on 30 May 2008
Examination hearings held between 20 January and 4 February 2009

Planning Inspectorate's Reference: PINS/Z3825/429/7

1. Introduction and Overall Conclusion

- 1.1 Under the terms of section 20(5) of the Planning and Compulsory Purchase Act 2004 (the 2004 Act), the purpose of the independent examination of a Development Plan Document (DPD) falls into two parts. This is to determine, firstly, whether it satisfies the requirements of section 19 and section 24(1) of the 2004 Act, the regulations under section 17(7), and any regulations under section 36 concerning the preparation of the document; and, secondly, whether it is sound.
- 1.2 This Report contains my assessment of the West of Bewbush Joint Area Action Plan (the JAAP) DPD in terms of the above matters, along with my recommendations and the reasons for them, as required by section 20(7) of the 2004 Act.
- 1.3 On 27 June 2008 amendments to the 2004 Regulations came into force, but they provide that my Examination should continue under the original 2004 Regulations as the JAAP was submitted before the 27 June amendment. In making the assessment of soundness, I began by focussing on the nine tests of soundness set out in ¶ (paragraph) 4.24 of Planning Policy Statement (PPS12): *Local Development Frameworks*, 2004. However, PPS12 was revised in June 2008 (and re-titled *Local Spatial Planning*) and so I have assessed the submitted document against the legal requirements and soundness criteria as set out in ¶s 4.50-4.52 of the new PPS12.
- 1.4 I am satisfied that the JAAP meets the requirements of the Act and Regulations. In line with national policy, the starting point for the Examination is the assumption that the Councils have submitted what they consider to be a sound plan. The Changes I have specified in this binding report are made only where there is a clear need to amend the document in the light of the legal requirements and/or the tests of soundness in PPS12. None of these Changes should materially alter the substance of the overall plan and its policies, or undermine the Sustainability Appraisal (SA) and the participatory processes already undertaken.
- 1.5 My Report firstly considers the legal requirements, and then deals with the relevant matters and issues considered during the Examination in terms of testing justification, effectiveness and consistency with national policy.

My Overall Conclusion

- 1.6 I find the JAAP to be **sound**, subject to it being changed in accordance with the Annex A: Schedule of Changes to this Report.
- 1.7 In summary, the **key changes** required are:
- A plan period to 2018 inserted into WB 1.
 - Tasks and infrastructure for each Core Phase clarified throughout the JAAP.
 - To explain that any shortfall in housing numbers is to be addressed in the Core Strategy Reviews.
 - Design and Access Statements principles in WB 4.
 - More flexibility in the sizes of the facilities in WB 5 and 6, and to be assessed at the time of application.
 - Altering WB 11 to set a target for affordable housing with encouragements only (not requirements) for wheelchair homes and Lifetime Homes.
 - Deletion of unnecessary policy WB 14 (Archaeology).

- Sustainable drainage systems to be used only where feasible (WB 17).
- The amount of open space in WB 19 to be approximate only and assessed at the time of application.
- Changing WB 22 from “requiring” various aspects of sustainable construction to “encouraging” them, and introducing a new Environmental Infrastructure Area.
- Alterations to the timetabling and order of the remediation works in WB 23.
- Western Relief Road safeguarded for 5 years or until the later of the two Core Strategy Reviews is adopted (WB 24).
- Deletion of much of Chapter 6.
- Consequential alterations to the Monitoring Framework Table.
- A revised housing trajectory to comply with the JAAP’s provisions.

My Approach

- 1.8 I have had regard to the issues raised in all the representations duly made both on the JAAP following its submission to the Secretary of State (SoS) and on the alternative sites advertised by the Councils in August 2008. It is not a requirement of the 2004 Act that I consider or report on “objections”, and consequently my Report does not list individual representations or respond to all the points made. I have concentrated on the issues that go to the heart of whether the JAAP is sound or not. My task is not to make the JAAP “more sound”.
- 1.9 The detailed wording of my recommended Changes is set out in Annex A: Schedule of Changes to this Report, which also includes a number of **Changes** put forward by the Councils. Some of the Councils’ suggested changes are of a minor typographical, grammatical or factual nature. Nevertheless, I recommend them because cumulatively they improve the clarity of the JAAP and so its soundness. They were either discussed at the hearing sessions, or were sent to the participants for comments, and/or were published on the Councils’ web site. My recommendations take account of the explanatory text, where necessary.

2. Legal Requirements

- 2.1 The JAAP is contained within the Councils’ Local Development Schemes, the updated versions being approved in March 2007 (Horsham) and December 2008 (Crawley), and it is in line with the described content and timescale.
- 2.2 The Councils’ Statements of Community Involvement have been found sound by the SoS and were formally adopted by the Councils before the Examination hearings took place. It is evident from the documents submitted by the Councils, including the Regulation 28 and 31 Statements and the Self Assessment Toolkit (November 2008), that the Councils have met the requirements as set out in the Regulations.
- 2.3 One respondent queried whether Crawley Borough Council had prejudged the site selection within the JAAP by its decision on 6 April 2005 that development on Ifield Golf Course would be unacceptable. However, I am satisfied that this was not the case. That decision was taken in a different context (a consultation response to the Horsham Core Strategy), and the Council subsequently decided (notably in February 2006 and in policy W1 of Crawley’s Core Strategy) to jointly work with Horsham Council in assessing the JAAP study area, which included the Golf Course.

- 2.4 Alongside the preparation of the JAAP it is evident that the Councils have carried out a parallel process of Sustainability Appraisal (SA). During the Examination the Councils published on the JAAP web site a map clarifying the locations of the neighbourhood options considered as part of the SA. The Councils also explained in more detail the site selection constraints under which the SA operated, and noted some typographical errors in Appendix B. I leave it to the Councils to decide whether the SA can or should be amended. But I am satisfied that the JAAP has been properly subject to a SA.
- 2.5 In accordance with the Habitats Directive, I am satisfied that as a result of the scoping exercise carried out that there is no need for an Appropriate Assessment. Natural England confirmed on the 4 July 2008 that an Appropriate Assessment was not required for the JAAP as there would be no likely effect on the water quality and abstraction at the Arun Valley, or on air quality and bat foraging grounds, nor would the provisions of the JAAP have a significant recreational impact on Ashdown Forest.
- 2.6 I am satisfied that the JAAP has regard to national policy, subject to my Changes.
- 2.7 A letter of confirmation was received from the South East Regional Assembly on 11 July 2008 in accordance with Section 24 of the Planning and Compulsory Purchase Act 2004 which stated that the Assembly was of the opinion that the JAAP was in general conformity with the adopted Regional Spatial Strategy (RPG9 and Alterations) and the emerging Regional Spatial Strategy (the draft South East Plan as submitted to the SoS on 31 March 2006). I am satisfied that the JAAP is in general conformity with the SoS’s Proposed Changes to that Plan, published on 17 July 2008.
- 2.8 The JAAP’s intention is to deliver 2,500 dwellings (policy WB 1), but it is unclear that it intends to do this by 2018 as set out in the Horsham Core Strategy. Indeed, ¶s 6.3 6.4 are somewhat ambiguous on this point. I agree with the Opinion (submitted by the Councils) of Rhodri Price Lewis QC that the JAAP policies have to say “*either clearly or in effect*” that development will be programmed for completion by 2018 – and, as he said, both the Core Strategy and the JAAP have to say this. So I disagree with the Councils that this is a matter which can be left solely to the Core Strategy. All of which leads to a concern that the JAAP as submitted might not conform to the Core Strategies, or even match its own housing trajectory.
- 2.9 I therefore recommend **Changes** to policy WB 1 and ¶s 6.3 and 6.4 (its deletion) to make clear that development is to be programmed for completion by 2018. With these, and the other minor Changes in my Report, I am satisfied that the JAAP would be in conformity with the Core Strategies.
- 2.10 I am satisfied that the JAAP has had regard to the Sustainable Community Strategies for the area.
- 2.11 I am satisfied that the JAAP complies with the specific requirements of the 2004 Regulations including the requirements in relation to the publication of the prescribed documents; the availability of them for Inspection and local advertisement; and the notification of DPD bodies. There is no need for the provision of a list of superseded saved policies as there are none.
- 2.12 Accordingly, I am satisfied that the legal requirements have all been satisfied.

3. Key Issues

- 3.1 In framing and examining the key issues for the JAAP, I have in mind the soundness tests set out in PPS12 at ¶s 4.51 and 4.52; namely, in order to be sound the JAAP should be justified, effective, and consistent with national policy. To be “justified” means that the JAAP must be founded on a robust and credible evidence base, and be the most appropriate strategy when considered against the reasonable alternatives.

To be “effective” the JAAP must be deliverable, flexible, and able to be monitored. If the JAAP is not clear it is unlikely to be deliverable and so not effective.

4. Whether any alternative site would meet the principles and objectives set out in the Core Strategies better than the proposed site

- 4.1 Both Core Strategies clearly defined the geographical Area of Study and the key parameters that any site, or combination of sites, would have to meet in the JAAP – the most important being the ability to accommodate around 2,500 dwellings laid out on a neighbourhood basis. As a result the SA identified two main areas – the land to the West of Bewbush (the proposed site) and land West of Ifield, which includes Ifield Golf course and the land north of this (but not westward) as far as the floodplain. The SA assessed four possible scenarios involving these two general land areas.
- 4.2 Overall, I agree with the SA that the most appropriate site out of those assessed in it would be the West of Bewbush site – see ¶s 4.6 and 4.7 below.
- 4.3 A number of other possible alternative sites and development possibilities were also put forward by respondents, which were advertised and consulted upon by the Councils. I find none of them to be a viable or appropriate alternative or use, and I set out my reasons below for those sites that were not later withdrawn.
- 4.4 ADS1 involves land outside the defined Area of Search, and so it would not conform with the Core Strategies; no SA has been carried out for that land; and the area of land within the Area of Search would not be able to accommodate the required number of houses. ADS3 also involves land outside the Area of Search for which no SA was carried out, and a land use (a major acute hospital) which is not one identified to be found in the JAAP by the Core Strategies. ADS4 similarly involves land outside the area of search and for a major use not identified in the Core Strategies. Although a SA was carried out for ADS4, it was deficient in a number of key aspects and was not subject to full public consultation.
- 4.5 ADS5 and ADS6 primarily involve Ifield Golf Course, and on their own neither of these sites would be capable of accommodating 2,500 dwellings. ADS7 includes some land subject to flooding and other environmental constraints, together with additional land which has not been subject to SA. It would not be able to accommodate the number of dwellings required, and I am doubtful that other requirements of the Core Strategies, particularly minimising traffic levels in Crawley, could be met due to the lack of evidence. ADS9 is a very small piece of land which could not accommodate the dwellings required and on which no SA has been carried out. It also has flooding and aircraft noise constraints.
- 4.6 I am impressed by the advantages of the selected development site over its rivals, particularly its direct access to the strategic road network, its reasonable landscape and environmental impact, its ability to function as a single neighbourhood, its use of a landfilled area, and the possibilities for road and rail public transport. It is also genuinely available for development as it is under the option of a single developer. I realise that the site is split by a railway line, but there is no impediment to the proposed rail crossings which would link the two parts of the site. In short, the site would comply with the Core Strategies requirements.
- 4.7 In contrast, the common failing of all of the alternative sites or uses is that none would conform to the requirements made on the JAAP by both Core Strategies. I therefore discount them all as reasonable alternatives, and conclude that no alternative site, or any suggested combination of them, would meet the principles and

objectives set out in the Core Strategies better than the proposed West of Bewbush site.

5. Whether the JAAP will deliver the required numbers within the plan period, and whether the infrastructure is clear, costed, realistically timed and capable of being funded

- 5.1 This issue concerns the deliverability of the development, and hence the effectiveness of the JAAP. The importance of deliverability and infrastructure costing is emphasised in the advice in PPS12, particularly the section from ¶ 4.8 onwards and at ¶ 4.45. The JAAP rightly concentrates on this issue and Chapter 5 is devoted entirely to it. The Councils have worked with the developer and infrastructure providers to build up a reasonably clear picture of how this growth area will be delivered.
- 5.2 The JAAP was conceived during a period of market buoyancy. As the current economic downturn was unpredicted by nearly all commentators, players and Governments, it is unsurprising that the JAAP does not make allowances for the conditions which the development industry now faces. Nevertheless, I commend the Councils and the developer for undertaking economic appraisals during the Examination which aimed to take into account, so far as possible, present market uncertainties – and then to show how the development could proceed given some flexibility in the JAAP policies.
- 5.3 The Councils have provided clear and convincing evidence for the rationale behind the number of the phases, the selection of the phase areas, and the various elements of the development to be provided in each phase. In so doing the Councils suggested some minor changes to the JAAP in order to clarify some of the tasks and infrastructure that are to be carried out within each phase. Most of these are to Chapter 3 and Chapter 5 (particularly Tables 2, 3 and 4). As they are necessary for certainty about the deliverability and so the effectiveness of the JAAP, I recommend those **Changes**.
- 5.4 The Core Phases are logically selected to facilitate development in a comprehensive and viable manner. For instance, phase 1 is relatively easy to develop; phase 2 more difficult (landfill remediation) and provides most of the neighbourhood and other infrastructure; and phase 3 would be on greenfield land with the greatest value, thus providing an incentive to develop the neighbourhood to access this last financial reward. There is clear information as to the responsibilities for the delivery of each of the main infrastructure necessities in the JAAP. I believe that the three selected phases and the infrastructure and tasks set out for each (with the Changes I recommend) would ensure an effective JAAP.
- 5.5 Most of the infrastructure would be funded by the development itself, and so it is important to show that it can be delivered through this means. The Councils produced a series of 9 economic appraisals of the development – one for each of the proposed three Core Phases covering a low, medium and high economic cycle. The various infrastructure costs at present day values were itemised, and these were either derived from the statutory undertakers or from detailed and specialist studies, such as that on the required land remediation works. I am satisfied that these have been reasonably estimated and accounted.
- 5.6 There was significant disagreement amongst participants during the Examination as to whether the costs and income had been properly assessed, and whether the correct assumptions had been made regarding the various economic cycles or scenarios chosen. Dealing with the last point first, the high economic scenario showed that the development would be completed by 2018; the medium scenario showed completion by 2019 (about 85% complete by 2018); and the low economic scenario showed

completion by 2026. Initially the Councils and the developer considered that the high economic scenario was most likely, but later revised that view and said that that the most likely outcome would be the medium scenario.

- 5.7 Economic forecasts are notoriously inaccurate, as the present credit crunch has so graphically shown. The submitted scenarios were based on economic forecasts made in September 2008. However, during the Examination later forecasts up to January 2009 were considered, and it was those that led the Councils and the developer to indicate that the medium economic scenario would be most likely. I agree with that analysis, primarily because most commentators foresee a steady recovery from 2010/11, which is the anticipated start date for the development. The average house price predictions from 2010/11 in the medium scenario are reasonable, and reflect average price inflation from the Halifax price index since records began. And I consider that the house price fall from 2007 and beyond has been reasonably costed.
- 5.8 The scenario appraisals have been based on a cash-flow based residual site development value appraisal model or “toolkit”, originally produced by consultants on behalf of the former Housing Corporation. This has been widely used to validate financial assessments by developers, enabling all parties to assess viability in a standardised manner, albeit primarily in relation to affordable housing. There are limitations to the toolkit, which the Councils and developer have sought to overcome, most notably by providing a narrative and including interest payments on land purchase. Of course, I am acutely aware that it is a feature of residual valuations such as this that comparatively minor adjustments to the constituent figures can have a major effect on the result. Nevertheless, this methodology and this particular toolkit are commonly used for the valuation of development sites, which shows that it is potentially a reasonably precise valuation instrument.
- 5.9 A number of detailed criticisms were made of the appraisals, which I deal with next. I was assured that pre-development costs were already substantially included, that initial (option) land payments would be small, and that interest on these items would not be significant. I am satisfied that affordable housing values have been calculated in a reasonable, albeit different, way from those originally calculated by the Councils in their URS Development Costs report of July 2007. Affordable housing grants were included in the appraisals, and I think it sensible to assume that particular income stream given the Government’s commitment to providing such housing.
- 5.10 I am also satisfied that the potential home values have been reasonably calculated and reflect not only a reduction for the current and projected housing market downturn, but also a reduction for the Bewbush area. I agree with the Councils that a home value reduction for building on landfill would not be necessary given the evidence that there has been little, if any, reduction on other similar sites. Also, assuming proper land remediation, there would be no difficulty in potential owners obtaining a mortgage or a NHBC Buildmark warranty for their property.
- 5.11 I am satisfied that realistic estimates of base costs have been included on matters such as professional fees, contingency allowance, accumulated interest, production costs, and selling/legal fees. The timescale limitations of the toolkit mean that the three phases have had to be calculated separately.
- 5.12 Whilst it is not practicable to confirm all the detailed variable inputs to the appraisals, overall I consider that they show a reasonably accurate snapshot of the economic viability of the development at the present time as projected over the expected development period, particularly for the important first years of Core Phase 1. Of course, there are great uncertainties. The general economic situation could get worse; house prices could fall even further than predicted; or build and general inflation could rise quicker than predicted. But these worsening factors would affect all development in the country and all would be equally blighted by them.

5.13 I have taken a pragmatic approach to the appraisals, particularly as an accepted appraisal toolkit or model has been used to standardise inputs and outputs. I consider that the Councils and the developer have taken account of most factors in the calculations in a realistic manner. I appreciate that the figures are not certain and could be changed – but I believe that they show that the development is viable in the medium economic scenario and so the JAAP would be effective. Moreover, there is also the safeguard of some flexibility in the calculations and requirements, which I now move on to consider.

6. Whether the development provisions are flexible, and capable of dealing with slippages in their delivery

6.1 The economic appraisals contain sufficient flexibility to mitigate some of the adverse concerns raised about them for a number of reasons. Firstly, they are based on sales rather than build completions, and so in reality the end date of the medium scenario is pessimistic. Secondly, apart from the affordable housing grants, the appraisals do not include any other element of public funding that might be available, such as from the Regional Infrastructure Fund. Thirdly, there are some savings which could be made, such as the ransom element for the railway crossings, and others which could be made with the Councils’ agreement such as reductions in affordable housing. Elsewhere in my Report I have accepted the Councils’ suggestions to reduce to one of “encouragement” firstly the sustainable construction requirements (policy WB 22) and, secondly, lifetime and wheelchair adapted homes (policy WB 11) – both of which could reduce costs.

6.2 This brings me to the need for flexibility in the JAAP that is necessary in order to deal with the “what if” contingencies – the most likely one being that the development takes longer to build out than intended. Again, this concerns the JAAP’s effectiveness.

6.3 Inherent in any DPD is the flexibility mentioned in Planning Policy Statement 3 (PPS3) at ¶ 64 that no specific management action may be required where actual performance is within 10 to 20 percent of the housing trajectory. But this is subject to the JAAP still being expected to achieve the trajectory rates, so this proviso would not be sufficient to accommodate the overshoot suggested in the medium economic scenario. Therefore, the JAAP has set out other contingency provisions. As I have said, there is flexibility in the affordable housing policy (WB 11) such that the full requirement may not need to be met if there are relevant viability concerns.

6.4 Moreover, ¶s 5.31 onwards deal specifically with contingency arrangements. These paragraphs propose flexibility in the timing and density and order of the various parts of the Core Phases in order to increase delivery, which I agree is eminently sensible and practical. Of particular relevance is ¶ 5.35 which indicates that the field west of the link road and south of Pondtail Shaw could be used as an additional contingency development area. However, the exact circumstances of this contingency are not clearly laid down, and so I welcome the Councils’ suggested Changes to make it clear (and so make the JAAP effective) that the land is not required to meet the policy WB 19 open space requirements; that development is subject to part of it possibly being required for a Western Relief Road; that a final decision on its use will be taken in Core Phase Two (so that if it remains as open space then this can be implemented in Core Phase 3); and that if development is needed there then a firm western boundary would be required. I therefore recommend those **Changes**, and consequential **Changes**.

6.5 An additional flexibility set out in ¶ 5.37 is the Core Strategy reviews currently being undertaken by both Councils, which are due for adoption in 2011 and 2012. The Council suggested a Change which effectively said that the South East Plan allows this development’s completion date to be extended to 2026. I disagree fundamentally

with that interpretation of GAT3 in the Proposed Changes. GAT3 has existed since the draft of March 2006 (when it was GAT2), prior to the adoption of both Core Strategies. Although it has altered in detail, in essence it sets an overall housing target for the 2006 to 2026 period for the whole sub-region and does not refer specifically to this site. The end date target set by the Horsham Core Strategy forms part of the South East Plan development within the first part of the latter’s overall period.

- 6.6 Therefore, I have recommended a **Change** in Annex A to ¶ 5.37 which indicates that the Core Strategies will deal with any shortfall in numbers if the development proceeds at a lower rate than anticipated. I have also recommended consequent **Changes** to ¶s 6.4 and 6.5. With these Changes I believe that the JAAP will be sufficiently flexible to deal with any presently foreseeable circumstances, particularly a reduced delivery rate, thus making it effective and sound.

7. Chapters 1, 2 and 3

- 7.1 Most of the recommended Changes to Chapters 1 and 2 are updating ones, suggested by the Councils to prepare the JAAP for adoption, which I endorse. And most of the Changes I recommend to Chapter 3 are consequential ones flowing from matters dealt with elsewhere in my Report – primarily the clarity of deliverability, highway matters, an Environmental Infrastructure Area, and flexibility.
- 7.2 However, there are a few minor Changes to these Chapters which I recommend as a result of the evidence given to me. As a result of a recent survey of the potential historic parkland at Kilnwood, the Councils have satisfied me that the provisions in the JAAP (WB 14) requiring the carrying out of such a survey are no longer needed and that there are no parkland relics that need to be retained. So I recommend **Changes** accordingly to ¶s 1.19, 3.9, 4.31 and 4.32 (deleted), and also the deletion of the no longer necessary policy WB 14, all necessary for effectiveness.

8. Whether the JAAP provides sufficiently clear and comprehensive guidance to developers in order to promote a high quality, well designed and serviced neighbourhood

- 8.1 This issue mainly concerns policies WB 3 and 4, which set out the principles to be considered for the neighbourhood design. But the policies and their explanatory text do not explain how these design principles are to be positively implemented and so the JAAP would fail the effectiveness test.
- 8.2 The Councils said during the hearing sessions that the principles would be incorporated and expanded in the Design and Access Statements under the provisions of Circular 01/2006 (including current best practice by the SoS, e.g. the Filton Airfield appeal decision) that would accompany the various planning applications for the site’s development. The Councils therefore suggested **Changes** to add text and to add to policy WB 4, which I recommend, to explain what the Statements should contain and how they will be drawn up. With these Changes I am confident that the JAAP will provide clear, comprehensive and effective guidance on design.

9. Whether the JAAP provides sufficiently clear and comprehensive guidance to developers on the various necessary requirements to provide a functioning neighbourhood

- 9.1 I have some concerns that there are too many policies in the JAAP, and that some could be usefully brought together – such as policies WB 5 to 8. But, as I have said, it is not my task to alter something that is sound and that the Councils are content to operate in their present form.

Policies WB 5 and 6

- 9.2 There was an expressed concern that policies WB 5 and 6 are too prescriptive in setting size requirements for the community centre and primary care centre. The Councils said that this was based on evidence in their July 2007 Neighbourhood Assessment report, and on the size of existing similar facilities in Bewbush. But I think that the size limits are too prescriptive because space standards and population numbers could alter over the plan period. So I recommend **Changes** which retain the sizes as recommendations, whilst allowing flexibility to alter them in the light of future requirements in order to make the JAAP effective in the future.

Policies WB 7 to 10

- 9.3 I am satisfied that policies WB 7 to 10 are sound.

Policy WB 11

- 9.4 Affordable housing is dealt with in policy WB 11, which requires a **Change** to ensure it (and its explanatory text) reflects the Core Strategy requirement of a target (“up to”) of 40% affordable homes. The policy also suggests a range for each phase of development of between 30% to 50% affordable housing. This seems to me to be reasonable and flexible, and would enable the Councils to control in fine detail the geographical spread and timing of affordable housing to meet the population’s needs whilst still achieving an overall site target of 40% affordable homes. As I have mentioned, the policy contains a clause where flexibility on percentages can be introduced on viability grounds, which reflects the policies in both Core Strategies. I agree with the Councils’ suggested **Change** to make it clear in the policy that this flexibility is dependant on a viability appraisal as this is a key operational criterion.
- 9.5 The policy also requires that fixed percentages of affordable homes should be provided that meet fully adapted wheelchair standards and Lifetime Homes standards. There is no national requirement for a fixed percentage of dwellings to be Lifetime Homes, although the Councils told me that this might occur by 2011 or 2013. This is the time that development on the site is due to start, which brings into question the need for this part of the policy. And there is only encouragement nationally for wheelchair standards in homes.
- 9.6 The Councils had not carried out an assessment of these two requirements on the economic viability of land for housing, as required in ¶ 29 of PPS3. I was told that national estimates were that Lifetime Home standards would add £550 to the cost of each dwelling, but I regard that evidence as partial and incomplete and so it does not fulfil the PPS3 requirement. The Councils were unable to produce any comparison figures which indicated that the Crawley/Horsham area had a need for these types of dwellings that was any greater than that regionally or in selected other districts nationally. So I see no justification for introducing these requirements locally in advance of national timings.
- 9.7 Therefore, I agree with the Councils’ suggested **Changes** made after the hearings to downgrade the Lifetime Homes and wheelchair standards provision from a requirement to an “encouragement” only in the policy and explanatory text, and to reduce the wheel chair homes percentage from 5% to 2% of affordable homes (the Councils’ figures show that wheel chair users form under 2% of the population).
- 9.8 The policy requires a specific tenure split. However, the Councils conceded during the Examination that circumstances may require a variation which would be informed by up-to-date housing market and needs evidence. Given the period of time that the JAAP would operate, I consider that this flexibility should be clearly stated in the policy and its explanatory text, and so I recommend **Changes** to this effect. In other respects I find the policy to be sound.

Policies WB 12 to 15

- 9.9 I judge policy WB 12 to be sound as submitted. The Councils suggested a **Change** to ¶ 4.27 to indicate that the effect of increased public access on biodiversity should be taken into account under policy WB 13, and I agree that this is necessary for the policy to be effective. It is otherwise sound.
- 9.10 I have previously mentioned policy WB 14 and its associated explanatory text because the survey of the Kilnwood historic parkland has already been carried out and it has been established as a result that there are no historic relics that should be retained. I therefore recommend its deletion with consequent **Changes** to the explanatory text, and the removal of the “Archaeological & Parksapes” notation from the Conceptual Masterplan.

Policy WB 15

- 9.11 Policy WB 15 concerns Green Linkages, and the Councils made a number of suggested **Changes** (which I accept) to amend the Conceptual Masterplan to reflect the reality of where the linkages would actually be placed and the directions of flow in the northwest corner and by the A264. The Councils also wished to clarify what would happen to linkages to the area south of the A264 in ¶ 4.34, and in ¶ 4.35 that further linkages would be explored. I agree that these are necessary **Changes** in order to clarify the intent of the policy. I also agree that the JAAP should make it clear in a **Change** that the bridge across the railway by the proposed station and the connections eastwards would also cater for equestrians (¶s 3.11, 3.17 and 3.19).
- 9.12 This brings me to the question of the crossing of the railway by the bridleway, presently achieved by a level crossing with the JAAP proposing an additional bridge by the railway station. Respondents were concerned that the bridge route would be too far out of the way from the bridleway’s present eastern edge route, and that equestrian safety would be at risk on a multi-use bridge. Whether these are likely problems depends upon the exact detail of the design and location of the bridge, which is not before me. I accept that this is an important issue because of the recreational potential of the bridleway’s linkages to other attractions and networks.
- 9.13 I am not convinced that the existing and potential future bridleway usage evidence justifies the expense of an additional, fourth, separate bridleway bridge, even if it was used by other modes of transport – and there may well also be an adverse visual impact. But to make the policy effective and sound I recommend a **Change** to indicate that the position and design of the bridge should mitigate and reduce these two concerns insofar as this is reasonably possible in construction and visual terms.

Policies WB 16 to 21

- 9.14 I am satisfied that policy WB 16 is sound, subject to a necessary **Change** to reflect the noise wording used in the Crawley Core Strategy in ¶ 4.36 and the policy (i.e. “60dBA or more”).
- 9.15 There are underlying geological conditions (Weald Clay) which could pose problems for the provision of sustainable drainage systems. Therefore, the evidence indicates that such systems could not be “required” as the JAAP intends, so I endorse the Councils’ suggested **Change** to WB 17 and its associated explanatory text that they should be provided “where appropriate”. Otherwise, this policy is sound.
- 9.16 Household waste recycling is dealt with in policy WB 18. The introduction of an Environmental Improvement Area under policy WB 22 creates the opportunity for a household waste recycling facility to be located there, if it is needed. Therefore, I recommend a **Change** to WB 18’s explanatory text to deal effectively with this potential neighbourhood scale provision. The County Council desired a larger scale

Built Waste Facility to meet wider District, sub-County or County needs. However, this is not a requirement of the Core Strategies and so its inclusion would not legally conform with them. Nor is it even a possibility in the County’s Minerals and Waste development plan or strategy. It should not, therefore, be included in the JAAP and should not be mentioned. In all other respects the policy is sound.

- 9.17 The JAAP requires financial contributions at ¶ 4.50 to improve nearby school sports facilities which have public access. However, the Councils’ explained at the Examination that there is no justification for this requirement. I therefore recommend a **Change** to delete the paragraph.
- 9.18 The first bullet point of policy WB 19 is inflexible as it sets a specific amount of open space when the exact population (upon which the open space area is based) is not finally known, and so the evidence base does not justify it. Therefore, I recommend a **Change** to introduce this required flexibility (already stated in ¶ 4.51) in order to make the policy effective in the long run.
- 9.19 I am also concerned that the policy and its explanatory text are too prescriptive in setting out the exact areas of open space required, and specifying an even split between formal and informal space. Again, I do not believe it is right for the JAAP to be so exact in its figures when the areas and the split between informal and formal open space are dependant on population numbers and needs assessments which are presently unknown, so the evidence base is not conclusive. I therefore recommend **Changes** (for similar reasons as above in 9.18) to make these amounts “approximate” (also in ¶ 3.15 – other ¶s in Chapter 3 already use the flexible words “some” or “around”), and to make it clear that the type split will be reviewed in the light of up-to-date assessments at the time that planning applications are determined.
- 9.20 I am satisfied that policy WB 20 on education is sound with the clarifying **Changes** suggested by the Councils as to its entry form size and funding source. Similarly, I consider that policy WB 21 (Employment) is sound, subject to a **Change** to its explanatory text at ¶ 4.64 to clarify that the type of employment uses envisaged are service uses that would benefit the neighbourhood and not non-conforming uses.

Policy WB 22

- 9.21 Policy WB 22 and its associated explanatory text grapples with sustainability. The policy requires percentage savings in CO₂ emissions through the provision of renewable and low-carbon energy. This flows from the South East Plan which says in policy NRM 11 that new developments of more than 10 dwellings or 1000m² of non-residential floorspace should secure at least 10% of their energy from decentralised and renewable or low-carbon sources. The South East Plan allows for a more ambitious target in DPDs, but says that it should be tested so that the local circumstances that warrant and allow this are clearly demonstrated.
- 9.22 This reflects the advice in ¶ 33 of the PPS1 Supplement *Planning and Climate Change*, which says that any policy for decentralised energy supplies to new development (and for sustainable buildings) must ensure that what is proposed is viable in terms of bringing sites to the market, avoids any adverse impact on a community’s development needs, will not harm housing supply, and does not inhibit the provision of affordable housing. Unfortunately, the Councils do not have an evidence base to justify the required viability for either a 10% or 50% overall annual requirement in policy WB 22. The fact that the site has some specific opportunities is not sufficient – the same could be said of many other sites – and that is not the evidence required in the PPS1 Supplement. Therefore I recommend the Councils’ **Changes** to the policy and the text (with strengthening additions) to “encourage” rather than to require these matters, with a recommended minimum of 10% of the energy coming from decentralised and renewable or low-carbon sources.

- 9.23 The definition of what constitutes a “zero carbon” home has altered, and so I agree with the Councils’ suggested Glossary **Change** to refer to this evolving situation and to where the latest version of it can be found, rather than trying to define it exactly.
- 9.24 The PPS1 Supplement advises in ¶s 31 and 33 that it could be appropriate to anticipate levels of building sustainability in advance of the national timetable (as is proposed in the JAAP), but that, again, the local circumstances that warrant and allow this must be clearly demonstrated. The Councils do not have an evidence base which justifies the policy’s requirements for the Code for Sustainable Homes stipulated levels and the BREEAM “Very Good” standards. So, again, I recommend the Councils’ **Changes** to the policy and the text (with strengthening additions) to “encourage” rather than to require building sustainability to nationally agreed levels.
- 9.25 Water efficiency is a recognised national and South East Plan policy objective. The same PPS1 Supplement viability problems occur with the policy’s proposed water consumption target in advance of any requirements set out in existing or future Building Regulations. There is no viability evidence and no evidence that this site is in an area of particular water stress where the development would be unacceptable without the JAAP’s proposed restriction. Therefore, again, I recommend the Councils’ **Changes** to “encourage” water efficiency and to delete the specific target in the policy.
- 9.26 Given that the policy would be an “encouragement” only, I recommend a **Change** to delete the viability exception paragraph at the end as it is no longer needed.
- 9.27 During the Examination the Councils proposed a change to the explanatory text, Glossary definition and the Conceptual Masterplan to alter the proposed Combined Heat and Power Plant area to an Environmental Infrastructure Area. This, I believe, would be a required Change as it would be more effective and flexible in operation, because such an area could include not only a power plant, but also space for waste management, recycling facilities and other similar activities. However, I consider this to be an important Change which should be included within policy WB 22. I thus recommend a **Change** to the policy at its end to do this, and also consequent **Changes** to ¶s 3.14, 4.41, 4.43, 4.70, 5.5, 5.11, Table 3, a new Glossary definition (as suggested by the Councils) and to the Masterplan.
- 9.28 With the above Changes I consider policy WB 22 to be sound. It would be in accordance with national and South East Plan policy.

Policy WB 23

- 9.29 The necessary remediation to allow the landfill part of the site to be developed is dealt with in policy 23. Respondents said that other parts of the site than those identified in the JAAP and its evidence base had been filled in the past – mainly the field to the west and around the land filled area which forms part of the Core Phase 1 development. However, I am satisfied that this section has only been tipped for agricultural improvement purposes. I was told that this would not cause implementation problems for the phase 1 development.
- 9.30 The Councils have undertaken wide-ranging investigations, along with the developer, into the nature of the landfill, and how it could be made safe and re-contoured for housing purposes. This has included examination of key contamination issues, such as gas monitoring, which has revealed two localised areas of relatively high methane emissions to the south of Bewbush Brook. I am satisfied that suitable gas protection measures can be undertaken. I am also satisfied that foundations for buildings on the filled land could be accomplished without great technical complexity and at a viable cost.

- 9.31 There was no detailed or expert alternative evidence to contradict that put forward by the Councils and the developer that a safe housing use could be achieved in an economically viable manner. The landfill surrender application has been accepted by the Environment Agency, and so I recommend the various suggested **Changes** made by the Councils to update the JAAP in this respect. This licence acceptance is one indication that the site can be successfully restored.
- 9.32 I agree with the Councils that the exact details of the remediation strategy should be developed with the planning applications that will be submitted for the development as this will enable the best solutions to be adopted in the light of up-to-date detailed evidence. Thus, a flexible, and not a prescriptive, policy WB 23 would be the most efficient, and so effective, method of implementation.
- 9.33 However, sufficient work has been undertaken at this stage to be able to set out the rough timetabling and phasing of the remediation works, and to define in the JAAP exactly what is meant by “remediation” and “ground improvement and foundation” works. Thus I recommend the Councils’ suggested **Changes** on these matters, which affect the narrative of the order of works in the Core Phases in Chapter 5 (particularly ¶ 5.6), in order to make the policy clear and effective, and thus sound.

Policy WB 24

- 9.34 The principle of the Western Relief Road (WRR) in policy WB 24 was of great interest to respondents, especially for those with land interests to the north of the site. The Core Strategies say that the need for the WRR should be determined in the JAAP, and so that is a key requirement for the JAAP.
- 9.35 The Councils, the developer and the County Council have carried out detailed traffic assessment and computer modelling exercises covering the Crawley area and the nearby M23 and other junctions. As a result there was a consensus amongst these parties that the WRR was not needed to serve this particular development, subject to various measures which included public transport (bus) and junction improvements (A23/A2220, A264/A2220 and J11 M23). I note that the necessary public transport improvements for a development without a WRR do not include a railway station.
- 9.36 There was no contrary evidence of any substance from other respondents to indicate that these transport and junction studies were incorrect. I consider therefore that the evidence base is comprehensive and conclusively shows that a WRR is not required for the JAAP development. I therefore agree with the Councils’ suggested **Changes** to bring up-to-date the various requirements for the necessary transport infrastructure to serve the development and thus allow it to proceed without the WRR, and to indicate that the exact road improvements will require further work during the planning application(s) process.
- 9.37 I agree with those who urged that the JAAP should leave open the option and the possibility of a WRR in case it is required at a future date. This means that part of the main access to the west and part of the informal open space land beyond (more clearly defined in a **Change** to the Masterplan) should be safeguarded for a possible WRR route across it.
- 9.38 I also agree that, for certainty and to enable the informal open space to be laid out to serve the development, the JAAP should set a time limit for that safeguarding. The Councils and the County Council were content to set a five year safeguarding time limit from May 2009 - the reasoning being that the Core Strategy reviews are currently under way (the last is projected to be adopted in 2012), and it is in that (and the sub-regional) context that any decision would be taken on further development which might require a WRR. So this work is projected to be well within the suggested five year safeguarding period. But timetables for development plan work can lengthen unexpectedly, and so I think that a precautionary approach should

be taken so that the opportunity for a WRR is not lost because of a late running Review. I think, therefore, that the land should be safeguarded for 5 years or up to the date of the adoption of the last of the two Core Strategy Reviews. Therefore, I recommend the necessary **Changes** to the JAAP to this effect, primarily to ¶s 4.117 and 5.35. This may not, of course, be the last word as the Core Strategy Reviews could also have something to say on the subject.

- 9.39 I am satisfied that the evidence base shows that the access proposals for the development would be safe, that the free flow of traffic in the area would not be significantly affected, and that sustainability objectives would be met. So with the Changes outlined above I find the policy and its explanatory text to be sound.

Policy WB 25

- 9.40 As I have mentioned, the railway station is not required as part of the public transport improvements for the development to function without a WRR. However, I agree that it is highly desirable that the necessary land for it, its car parking and a transport interchange are safeguarded in policy WB 25 and its explanatory text. If the station does not proceed, then I am satisfied that ¶ 4.132 contains the flexibility for alternative uses to be found for the safeguarded land, with my recommended **Change** that the most likely use is for informal open space (as the Councils suggested). Implementation of any alternative uses in Core Phase Three needs to be assured, and so I recommend **Changes** to state this in ¶ 5.15 and Table 4.

Policy WB 26

- 9.41 A number of transport improvements are required in order to achieve the servicing of the development without the need for a WRR, as I have said. The public transport provision is also needed in order to meet agreed sustainability objectives and to create a vibrant neighbourhood. The further work that has been carried out on the transport matters has resulted in a clearer and more detailed understanding of the necessary measures. I therefore recommend the **Changes** suggested by the Councils – primarily those in the Issue 5 Statement of Common Ground – to the policy and the explanatory text (¶s 4.101 to 4.113, ¶ 5.11 and Table 3) to make these requirements clearer, more precise, and thus effective. These make the policy sound.

Policy WB 27

- 9.42 I am satisfied that in principle the development can be adequately serviced by the necessary utility infrastructure – and that this can be delivered on time, has been reasonably costed, and is economically viable. I recognise that large scale development over this lengthy time period has inherent infrastructure uncertainties and that the position of, and the funding by, infrastructure providers can alter. But the Councils and developer have done as much as sensibly can be done at this stage to be certain that the infrastructure will be provided. Therefore, I find this infrastructure provision policy to be sound in requiring the necessary infrastructure to be demonstrated for each phase, subject to updating **Changes** to the explanatory text to ensure clarity and hence effectiveness.

10. Whether the JAAP is clear about the arrangements for possible future land allocations and the status of the remaining land within the Area of Study

Chapter 6 and Policies WB 28 and 29

- 10.1 What happens beyond the JAAP Area of Study is briefly covered in Chapter 6, but much of it is now out of date and no longer serves any effective purpose. Consequently, I recommend the Councils’ suggested **Changes** to delete much of the

explanatory text, particularly ¶s 6.6 to 6.15 and 6.20, with factual **Changes** to ¶s 6.1, 6.16 and 6.18. I have previously recommended other Changes to the Chapter’s text.

- 10.2 Policies WB 28 and 29 are purely factual and make clear that the JAAP should not prejudice possible further development, which will be decided in the Core Strategy Reviews, and sets out the key development plan policies which will apply to the remaining former Area of Study. I consider them clear, justified and effective, and so sound, subject to a **Change** to policy WB 29 to make it clear that the other policies apply to the area outside that covered by policy WB 1.

11. Whether the mechanisms in the JAAP for monitoring are sufficiently clear, detailed, and meet Government requirements

Chapter 7

- 11.1 The Monitoring Framework requires some extensive alteration to take account of the Changes I have recommended to the policies and explanatory text. I also agree with the Councils that the Indicator Number should be **Changed** from “WB” to avoid confusion with the numbering of the policies. In addition, some of the targets failed to establish time limits/periods or their measurability was questionable. The Councils have suggested a number of **Changes** to remedy these deficiencies, which I recommend in order to make the monitoring understandable and so sound.
- 11.2 Overall, the monitoring provision would meet the key test of providing sufficient information to assess policy implementation and its significant effects, having regard to the Councils’ available resources (¶ 4.28 of the Good Practice Guide). Thus, with my recommended Changes, I find the JAAP to be clear, detailed and effective in its monitoring arrangements and so sound in this regard.

12. Housing Trajectory

- 12.1 Unfortunately, a simplified housing trajectory (Appendix 1) was mistakenly included in the JAAP, instead of one which reflected the information in Table 1 (Programme of Housing Delivery for the JAAP) in Chapter 5. The Councils undertook a public consultation exercise on the correct trajectory with respondents to the JAAP and the Alternative Development Sites and Boundary Changes document, and placed the Changes prominently on its web site.
- 12.2 The amended housing trajectory primarily shows in tabular and graph form the information already in the JAAP, especially that in Table 1. It should, for that reason, be no surprise. It has been extensively advertised and I have taken account of the 6 representations received. In order for the JAAP to be effective, I therefore recommend the necessary **Change** to substitute the proper housing trajectory into the JAAP.
- 12.3 There are also Changes recommended to the Glossary, but most have either been previously mentioned in my Report, or are minor editing. The one additional definition is that of “Core Phase”, which I recommend as a **Change** for clarity and effectiveness.

13. Overall Conclusions

- 13.1 I conclude that, with the Changes I recommend in Annex A: Schedule of Changes, the West of Bewbush Joint Area Action Plan DPD satisfies the requirements of s20(5) of the 2004 Act and the associated Regulations, is sound in terms of s20(5)(b) of the 2004 Act, and meets the tests of soundness in PPS12.

David Vickery INSPECTOR

Annex A: Schedule of Changes

The following Schedule sets out the Changes that are necessary to make sound and clarify the JAAP. It includes all my recommendations described earlier in this Report together with changes put forward by the Councils to aid clarity and update the document in preparation for adoption. The Changes are expressed either in the conventional form of strikethrough for ~~deletions~~ and underlining for additions of text, or by specifying the Change in words in *italics*.

The items in **bold** under the Policy/Para column heading are specifically mentioned in my Report as being necessary to make the Plan sound or legal. Otherwise the Changes have been requested by the Councils to update the JAAP and to correct grammatical and spelling mistakes to make the JAAP clear and thus effective and sound.

Page numbers and paragraph numbering refer to the submission JAAP, and do not take account of the deletion or addition of text. Therefore, the text in the adopted version will have to be altered to reflect the consequential renumbering.

Page	Policy/ Para	Recommended Change	Report Ref
3	1.12	<p>This Joint Area Action Plan has been prepared in accordance with the Councils’ respective Local Development Schemes and is compliant with the Councils’ Statements of Community Involvement. The Final SA/SEA Report has also been prepared and covers the appraisal of options that helped to refine the proposals in this document.</p> <p><u>The submission JAAP and accompanying Final SA/SEA Report were submitted to the Secretary of State for independent public examination. Around 280 representations were received from organisations and individuals within the specified 6 week period for representations.</u></p>	1.9
3	1.13	<p>This Submission Joint Area Action Plan will be the subject of a six week period for representation before being considered at an independent Examination. If the representations received seek to include alternative or additional sites, alternative uses of the site (if they are significant in nature) or propose changes to the boundaries of the West of Bewbush area (as indicated on the Proposals Map), they will be advertised as soon as possible after the close of the period for the receipt of submission representations. There will then be a further period of six weeks for representations to be made on these matters. Any representation must relate solely to the advertised changes and should not include further alternatives.</p> <p><u>Some of the representations received sought the inclusion of alternative sites for development, or for changes to the boundary identified in the document (and indicated on the Conceptual Masterplan). These proposed changes were published in the West of Bewbush Joint Area Action Plan Alternative Development Sites and Boundary Changes document. As required, there was a further six week period for the receipt of representations on these proposed site or boundary changes. A further 105 representations were</u></p>	1.9

Page	Policy/ Para	Recommended Change	Report Ref
		<u>received on the 10 alternative sites or boundary changes.</u>	
3	1.14	<p>Representations must be made within the specified representation periods and only those who have done so will have the right to have their objections considered at the Examination.</p> <p><u>The Submission Joint Area Action Plan was subject to independent public Examination in January/February 2009 in order to test its soundness and to consider issues arising from the representations made at the Submission stage. The Inspector appointed by the Secretary of State to conduct the Examination produced a report with recommendations that were binding on the Councils. The changes required by the Inspector have been incorporated and the West of Bewbush Joint Area Action Plan, along with the Proposals Map, have been adopted by both Councils as formal Development Plan Documents and form part of their Local Development Frameworks.</u></p>	1.9
3	1.15	<p>Next Steps in Joint Area Action Plan Production</p> <p>This Submission Joint Area Action Plan will be subject to independent Examination to test its soundness and to consider representations on the basis of whether its policy approach and proposals are sound. The Inspector appointed by the Secretary of State to conduct the Examination will produce a report with recommendations, which will be binding on the Councils. Any changes that required by the Inspector will be incorporated in the Joint Area Action Plan, to be adopted (if found sound), along with the Proposals Maps for both Councils, as Development Plan Documents, which will then form part of the LDFs for Horsham District Council and Crawley Borough Council.</p>	1.9
4	1.19	<p>There is an archaeological parkscape around the property Kilnwood. An “historic parkscape” is recorded on West Sussex County Council’s Historic Environment Record (HER) in land to the south-east of Kilnwood. Recent surveys by a landscape historian and archaeologist have confirmed to the satisfaction of the County Archaeologist that there is no evidence of a designed parkland landscape and that this entry on the HER does not present a constraint to development. The southern part of this parkscape is now agricultural land...</p>	7.2 9.10
5	1.21	<p>... The remediation works will be undertaken before any development takes place <u>the commencement of Core Phase Two</u>, through a full programme of agreed land remediation works. The first stage of these works is <u>was</u> the surrender of the Waste Licence. An <u>The</u> application for the surrender is <u>was</u> made after a programme of monitoring <u>has</u> been agreed by <u>with</u> the Environment Agency and has been completed. It is anticipated that an <u>The</u> application for the surrender will be <u>was</u> submitted, by the prospective developer <u>landfill operator</u>, to the Environment Agency in mid <u>October</u> 2008 and <u>was</u> agreed <u>accepted</u> by the Agency in early 2009. The second stage is the physical remediation of the site. It is not</p>	5.3 9.33

Page	Policy/ Para	Recommended Change	Report Ref
		anticipated that <u>some</u> landfill material will be removed from the site but <u>and</u> that the landform will be remodelled. This provides opportunities in terms of masterplanning the new neighbourhood. Details regarding the landfill site and available remediation options are set out in the background documents to this Joint Area Action Plan.	
11	WB 1	<i>Add at the end:</i> ... and associated uses, <u>programmed in order to enable their completion by 2018.</u>	2.9
12	Heading	Land East of Holmbush Farm Access and West of Landfill Site Access – South of the Railway: <u>Core Phases 1 and 2</u>	1.9
12	3.5	Land between the Holmbush Farm access and Hoppers Brook is identified as informal open space linked with Pondtail Shaw, which <u>together form part of the firm western boundary of the development.</u> <u>Pondtail Shaw</u> will be retained and managed for public access, including part of the circular route that contributes to the green linkages provided in and around the land West of Bewbush. <u>However, part of this informal open space maybe safeguarded for an alignment of a possible western relief road after May 2014 if an agreed alignment is determined.</u>	5.3 6.4
13	Heading	Land East of Holmbush Farm Access and West of Landfill Site Access – North of the Railway: <u>Core Phase 3</u>	1.9
13	Heading	Land East of Landfill Site Access and West of Bewbush – South of the Railway: <u>Core Phases 1 and 2</u>	1.9
13	3.9	Land immediately south and east of Kilnwood will be provided as a landscape buffer and to take into account the historic context of the area. A landscape buffer will also be provided...	7.2
13	3.10	A secondary access will be provided onto the A264 as a right and left in, left out signalised junction. This may <u>will</u> be used as the access for the first core phase of development and will be provided for emergency access or for limited access for necessary or sustainable modes of transport such as school buses in the long term.	5.3
14	3.11	... pedestrians, <u>equestrians,</u> and cyclists, but not for ...	9.11
14	3.13	The N neighbourhood C centre will be provided in the second core phase of development although elements of it may be provided earlier.	5.3
14	3.13	...A 2-3 form of entry primary school will be provided...	1.9
14	3.14	A Combined Heat and Power plant (CHP) <u>and possibly a waste management or recycling facility</u> could be provided as part of the neighbourhood development <u>to assist in off-setting reducing</u> the carbon emissions of the new development. If this is considered the most appropriate method to off-set <u>reduce</u> carbon emissions, the Conceptual Masterplan identifies 1 hectare of land adjacent to the neighbourhood centre for the	9.27

Page	Policy/ Para	Recommended Change	Report Ref
		<u>GHP as an Environmental Infrastructure Area which could include the above uses,</u> close to the access road and Pondtail Shaw.	
14	3.15	... space with <u>approximately</u> 3 hectares ...	9.19
15	Heading	Land East of Landfill Site Access and West of Bewbush – South of the Railway: Core Phase 2	1.9
15	3.17	... pedestrians, cyclists, <u>equestrians,</u> public transport and emergency vehicles.	9.11
15	3.19	A pedestrian, cyclist, <u>equestrian,</u> public transport and emergency vehicle route will be provided ...	9.11
15	3.20	<u>A landscaped</u> buffer will be provided along the railway...	1.9
17	4.2	...which contains a mixture of uses to serve local needs...	1.9
18	4.4	...To assist this process planning applications for phases of development should be accompanied by design appraisal.	1.9
19	Photo	Photograph on page 19: <i>Move to more obviously support policy WB 3.</i>	1.9
19	New ¶s	<p><i>Add the following ¶s after ¶ 4.5:</i></p> <p><u>To ensure that the design of the new neighbourhood is of high quality, there should be a good, well-reasoned, consistent and thorough Design and Access Statement (DAS) in place at the outline planning stage, to include a phasing strategy. Early sections of the DAS should deal with the context, constraints and character analysis supplemented, where necessary, by supporting statements. There should be an overall vision and overarching design principles drawn from the contextual analysis to provide a solid foundation for the creation of a high quality development. The DAS must demonstrate with the necessary clarity and consistency, and in accordance with best practice, how the vision and principles would inform the detailed design and ensure a high quality development. This approach would establish the design principles and the commitment to quality and delivery at the appropriate stage. The DAS should be developed with the involvement of local communities, stakeholders and CABE or the Regional Design Panel and in partnerships with the District and Borough Councils.</u></p> <p><u>The DAS should include a strategic, site-wide masterplan which shows the different land use elements and the broad urban form, including the block structure and street pattern, etc. This would form the basis for individual strategies and detailed sample layouts needed to demonstrate how the vision would work and how the desired level of quality would be achieved. The DAS should also include a high level Design Code which should be of high quality and provide clarity and the right balance between prescription and flexibility.</u></p>	8.2

Page	Policy/ Para	Recommended Change	Report Ref
		<u>A detailed masterplan and design code for each phase, graphically illustrating the layout and built form and designed to accord with the principles in the DAS, is a necessary precursor to the submission of reserved matters applications in order to clearly establish the relationship of each development parcel to the scheme as a whole. The detailed master plans and design codes would build on the DAS and provide an appropriate level of detail for the submission of individual reserved matters applications. This approach will allow the masterplan to respond to changing circumstances as the site develops, while still being guided by the overarching principles set out in the DAS. Planning permission would include a condition requiring that the detailed masterplans, design codes and reserved matters applications should be in accordance with the DAS unless otherwise agreed in writing by the LPA.</u>	
19	WB 4	<i>Add at the end:</i> <u>The Design and Access Statements accompanying planning applications must provide a robust link between general development principles and final detailed designs and clearly demonstrate, through the use of examples and illustrative diagrams, how these principles would ensure high quality design.</u>	8.2
20	WB 5	<i>Add at the end:</i> <u>... space, the exact size will be determined at the time to meet the needs of the development’s population.</u>	9.2
20	4.7	<u>... the equivalent of three or four GP surgeries a surgery for three or four GPS will be required to meet additional demand...</u>	1.9
20	WB 6	<u>... doctor surgery of approximately 700m², plus</u> <i>Insert sentence before penultimate sentence:</i> <u>The exact size will be determined at the time to meet the needs of the development’s population.</u>	9.2
21	4.10	<u>On the application of West Sussex County Council’s ...</u> <u>... 200m² will exist, although, West Sussex County Council ...</u>	1.9
21	4.11	<u>... to fund on an expansion in library floorspace provision.</u>	1.9
21	WB 7	<u>150m² of library floorspace should be provided, within ...</u>	1.9
22	4.13	<u>Several neighbourhood centres also contain a multi-purpose ...</u>	1.9
23	4.14	<u>... at the planning application stage, the nature of the ...</u>	1.9
23	4.15	<u>... for affordable housing delivering delivery.</u>	1.9
23	4.16	<i>Add at the end:</i> <u>... , although this will be kept under review using the latest housing market and needs evidence.</u>	9.8
23	4.17	<u>... phase should include 30% to 40 50% affordable housing.</u>	9.4
24	4.18	<u>A range of non-general needs housing will be required should</u>	9.7

Page	Policy/ Para	Recommended Change	Report Ref
		<u>be provided</u> , such as wheel chair accessible homes, independent move-on accommodation, clustered accommodation and extra care. It is anticipated <u>recommended</u> that a minimum <u>approximately</u> of 5 2 % of all affordable homes should meet fully adapted wheel chair standards and, <u>in the event that national requirements do not come into force</u> , the developers are encouraged to design <u>approximately 20% of the scheme designed</u> affordable homes to meet Lifetime-Homes standards.	
25	WB 11	<p>Affordable housing should comprise <u>a target</u> 40% of the total housing ...</p> <p><i>In the third ¶ add at the end:</i></p> <p>... , <u>although this will be reviewed using up-to-date housing market and needs evidence throughout the implementation of the development.</u></p> <p><i>In the fifth ¶:</i></p> <p><u>Developers are encouraged to design and build approximately</u> A minimum of 5 2% of all affordable homes should be to fully adapted wheel chair standards and <u>approximately</u> 20% of affordable homes should be designed to meet Lifetime-Homes standards.</p> <p><i>Add at the end of the final ¶:</i></p> <p><u>The local planning authority may request a viability appraisal be carried out to accompany a planning application.</u></p>	9.4 9.7 9.8
26	4.24	<p><i>In the first sentence:</i></p> <p>... required to mitigate <u>minimise</u> the visual impact ...</p> <p><i>In the second sentence:</i></p> <p>... strategy to mitigate <u>minimise</u> the impact ...</p>	1.9
27	4.26	... mature to mitigate <u>minimise</u> any adverse effects ...	1.9
27	4.27	<p><i>In the second sentence:</i></p> <p>... and, where possible <u>appropriate</u> taking into account the effect of increased access on biodiversity under policy WB 13, improved access ...</p>	9.9
27	4.28	... Capon Copse <u>Grove</u> and ...	1.9
27	4.29	... from the Sussex Biodiversity Records Office <u>Centre</u> ...	1.9
28	WB13	Capon Copse <u>Grove</u> and ...	1.9
28	4.31	<p>A historic parkscape exists around Kilnwood, a property in the north-west corner of the neighbourhood. West Sussex County Council’s Historic Environment Record (HER) records an “historic parkscape” in land to the south-east of Kilnwood. However, a survey in early 2008 has confirmed that there is no evidence of a designed landscape although several specimen trees which pre-date the development at Kilnwood remain in the current agricultural landscape and should be retained where possible. The first <u>addition</u> edition 6-inch</p>	7.2 9.10

Page	Policy/ Para	Recommended Change	Report Ref
		Ordnance Survey Map (1872-1874) shows the land as parkland, but the southern part of the Kilnwood parkscape is now agricultural land. This means that it is unlikely that parkland relics exist in the agricultural element; however, relics may survive in the northern element of the parkscape (just south and east of Kilnwood) <u>which lie outside the area identified for residential development.</u>	
28	4.32	<i>Delete the ¶.</i>	7.2
28	WB 14	<i>Delete the policy.</i>	7.2 9.10
29	4.34	<i>Add at the end:</i> <u>Whilst the area to the south of the A264 is outside of the West of Bewbush allocation, the Councils are seeking to enhance the link to the public Rights of Way network to the south of the A264 so it connects with the new ‘at grade’ crossing to provide a valuable and useable route into the High Weald AONB and Buchan Country Park.</u>	9.11
29	4.35	... open space, <u>and</u> provide and promote access to the surrounding areas. <u>The opportunity exists to explore further links into the existing Rights of Way network from the circular green linkage shown on the Conceptual Masterplan, particularly in the north-east corner of the site.</u>	9.11
29	WB 15	<i>Add bullet point at end:</i> <ul style="list-style-type: none"> <u>A bridleway link across the railway line near to the proposed station, taking account of the need for the minimum necessary distance from the bridleway’s present route and the safety of equestrians on the bridge and its approaches, but subject to reasonable construction and visual impact issues</u> 	9.13
29	4.36	... or potentially subject to, 60dBA or <u>above more.</u>	9.14
30	WB 16	... noise levels <u>greater than of 60dBA or more.</u>	9.14
30	4.39	Across the neighbourhood, Sustainable Drainage Systems (SuDS) and other measures, <u>such as Sustainable Drainage Systems (SuDS) where appropriate, should be implemented in accordance with PPS25 and the SFRA’s development recommendations.</u>	9.15
30	4.40	Flood attenuation measures and <u>the possible</u> implementation of SuDS should ensure that runoff <u>run-off</u> levels are not increased.	9.15
30	WB 17	Elsewhere within the neighbourhood flood attenuation measures and, <u>where appropriate,</u> SuDS should be incorporated to ensure there is no increase in pre-development runoff <u>run-off</u> rates.	9.15
31	4.41	<i>Delete all and replace with:</i> <u>The Environmental Infrastructure Area provides sufficient flexibility to incorporate, if required, a neighbourhood scale waste management facility, such as a household waste</u>	9.16 9.27

Page	Policy/ Para	Recommended Change	Report Ref
		<u>recycling facility.</u>	
31	4.42	Typically, such as a facility would ...	1.9
31	4.43	... a Household Waste Recycling Site 7 at Metcalf Way ... Such a facility is not identified on the Conceptual Masterplan; however, it might be possible to deliver such a facility at the planning application stage. <u>The Conceptual Masterplan incorporates an Environmental Infrastructure Area which provides the opportunity for the development of such a facility if there is evidence to support its inclusion.</u>	9.16 9.27
32	4.46	... include <u>approximately 15.4 hectares</u> ... <i>Add at the end:</i> <u>The exact amount of open space and the balance between informal and formal open space to meet local needs will be assessed using up-to-date data when each planning application is submitted.</u>	9.18
32	4.48	... the final form of provision 2 ; for example the provision ...	1.9
32	4.50	<i>Delete the ¶.</i>	9.17
33	WB 19	<i>In the first bullet point at the beginning and the end:</i> <u>Approximately 15.4 hectares ... The specific amount of open space to be determined by up-to-date population projections for each planning application submitted.</u> <i>In the second bullet point:</i> <u>An roughly even split ... open space, the exact balance to meet local needs to be determined by an up-to-date assessment for each planning application submitted.</u> <i>In the third bullet point:</i> ... accessible to the community and and to create ...	9.18 9.19
35	WB 20	<i>In the bullet points:</i> <ul style="list-style-type: none"> Nurseries, or equivalent facilities will be provided by the developer <u>development</u> to meet the ... A three <u>2-3</u> forms of entry primary school at ... <i>In the last ¶:</i> ... at secondary schools in Crawley, and the developer <u>development</u> will be expected to ...	9.20
35	4.59	... Submitted South East Plan (<u>which is now Policy GAT2 in the Secretary of State’s Proposed Changes to the South East Plan</u>), states that ...	1.9
36	4.64	In addition to the above, the neighbourhood may present the opportunity to accommodate existing non-conforming service <u>employment uses from within Horsham District and Crawley Borough, to the benefit of the neighbourhood.</u>	9.20
37	4.66	... are considered below 7 , including the overall standards of sustainable construction that will be required in residential and	9.22

Page	Policy/ Para	Recommended Change	Report Ref
		other development, as well as the need for strongly encourage decentralised energy generation and water conservation <u>for</u> <u>residential and other development</u> in order to ...	
37	4.67	... the objectives of the PPS1 <u>Supplement</u> on Climate Change, <u>the South East Plan</u> and of the Core Strategies of ...	1.9
38	4.69	... ‘zero carbon’ homes by 2016 <u>and non-residential buildings</u> <u>by 2019</u> . The Councils will expect all homes within the new neighbourhood to meet this timetable. However, <u>reflecting the</u> <u>opportunities presented by the scale, mix and location of this</u> <u>development</u> , there will also be an expectation that every effort is made, through the energy strategy, to ensure that homes encourage development to exceed the national timetable for emission reductions. This additional requirement <u>expectation</u> will depend on ...	9.22
38	4.70	... a significant ‘community energy system’ based on, but not limited to, <u>possibly including</u> a CHP system fuelled by locally sourced biomass or other sustainable and low-carbon source of fuel. Such systems depend on relatively dense development layouts and on the inclusion of a significant proportion of ... It is considered that this opportunity represents an appropriate strategy for the developers to meet the requirement expectation to exceed the Government’s national timetable for emissions reduction for the development to make a <u>contribution towards meeting the national, regional and sub-</u> <u>regional targets for renewable energy and carbon emissions</u> <u>reductions. The provision of communal environmental</u> <u>infrastructure will be located in the Environmental</u> <u>Infrastructure Area, which is identified on the Conceptual</u> <u>Masterplan.</u>	9.22 9.27
38	4.71	It is likely that energy efficiency measures and a community energy system will not, in themselves, be sufficient to allow the emissions reductions targets <u>set out in the national</u> <u>programme</u> to be met and exceeded. Therefore, the energy strategy devised will need to set out a clear ‘independent energy approach’ that will show how <u>integrated community</u> and ... Overall through the energy strategy, the developers will be expected <u>encouraged</u> to show how a minimum target of 510% of the new neighbourhood’s annual (non-transport) energy demands can be achieved through the generation of on-site <u>decentralised</u> renewable and ...	9.22
39	4.72	... to ensure that wherever possible <u>feasible</u> water is reused and rainwater intercepted and harvested.	9.25
39	Photo Caption	Wherever possible <u>feasible</u> rainwater harvesting ...	9.25
39	4.73	The developers involved in the neighbourhood will be expected to put in place such a strategy that will ensure that <u>encourage</u> water usage is minimised <u>demand to be substantially reduced</u> and that there are no significant detrimental effects of the development on ecosystems downstream of the development. At the development level, this should include, <u>where</u>	9.15 9.22

Page	Policy/ Para	Recommended Change	Report Ref
		appropriate, sSustainable dDrainage sSystems (SUDS) that ...	
39	4.74	<p>At the household level the Councils expect <u>high standards of sustainable construction, including measures to be put in place to achieve a maximum level of usage equivalent to 105 litres per person per day (pppd) which represents a saving of approximately one third of current water consumption in Horsham and Crawley reduce overall water demand to exceed Building Regulations wherever feasible.</u> In the same way as for energy, the water strategy will need to <u>use consider</u> both an ‘independent dwelling’ as well as a ‘community’ approach to demand reduction. <u>Wherever feasible, †individual homes should incorporate appropriate maximum consumption levels as well as water efficient fittings and appliances wherever feasible. Wherever possible, and simple rainwater harvesting through water butts must be incorporated to reduce external water consumption. Where further reductions are required, for example in achieving Levels 5 or 6 of the Code for Sustainable Homes possible, or where water butts are inappropriate, household rainwater harvesting or gray water recycling systems or community rainwater harvesting systems will be required should be considered. Where, due to density considerations, water butts are inappropriate or where further water consumption reductions are required, community rainwater harvesting systems will be required.</u></p>	9.25
40	4.78	... Level One being the lowest <u>and</u> Level Six the highest...	1.9
40	4.79	<p><i>Delete ¶ and replace with:</i></p> <p><u>The development at West of Bewbush will offer the opportunity to create a genuinely sustainable and possibly an exemplary neighbourhood in sustainability terms. In order to achieve the objective of a sustainable new neighbourhood, the developers will need to ensure that opportunities are explored to design and build the new homes to incorporate high standards of sustainable construction. This might involve the use of construction practices and technologies that go beyond those needed to achieve the energy and water requirements of Building Regulations and seek, in addition, to address the full range of aspects covered by the Code for Sustainable Homes. This approach would be encouraged to ensure, for example, that the sustainability of construction materials was carefully considered, that pollution was reduced, that the reduction and recycling of waste was planned for and that the ecological value of the site was protected and enhanced where feasible and viable.</u></p>	9.22
40	4.80	<p><i>Delete ¶ and replace with:</i></p> <p><u>Under current Homes and Communities Agency rules, all affordable homes receiving grant funding must achieve Level 3 of the Code, which is a base level for homes to be considered sustainable. This minimum rating may be increased in the future. Reflecting these requirements and the need for a balanced approach between housing tenures and mindful of the need to consider a full range of sustainable</u></p>	9.22

Page	Policy/ Para	Recommended Change	Report Ref
		<u>construction aspects, the developers are strongly encouraged to ensure that all of the homes on the development meet at least Level 3 of the Code. Where feasible and viable, homes achieving higher levels of the Code would be expected, particularly during the second and third phases of the development.</u>	
41	4.81	<i>Delete the ¶.</i>	9.22
41	4.82	The Councils will expect that, <u>wherever feasible and viable,</u> the non-residential ... ‘Very Good’ standard and, <u>where opportunities allow,</u> should include, wherever possible, individual buildings that meet the ‘Excellent’ standard.	9.24
41	4.83	This requirement <u>expectation</u> reflects the crucial role played by non-residential buildings in helping to achieve the critical mass required for the <u>potential</u> community energy ... and increase the viability of <u>any</u> community energy and water approaches <u>employed</u> .	9.24
42	WB 22	<p><u>The design and construction of the development should incorporate high standards of sustainable construction and seek to exploit opportunities for the creation of a genuinely sustainable new neighbourhood.</u></p> <p>An energy strategy will be required indicating how both independent and/or community approaches to renewable and low-carbon energy generation will be implemented to meet and preferably exceed (where possible <u>feasible and viable</u>) the national timetable for carbon emissions reductions in new homes. Overall <u>The energy strategy will be encouraged to should</u> show how at least <u>510%</u> of the development’s annual (non-transport) energy needs can <u>could</u> be met through on-site <u>decentralised</u> renewable and low-carbon generation.</p> <p>A water strategy will be required to show how <u>the development’s overall water demand can be reduced in order to meet and preferably exceed (where feasible and viable) the Building Regulations.</u> all homes can be designed to achieve a maximum water consumption target of 105 litres or less pppd.</p> <p>The new neighbourhood should be designed and constructed to incorporate the principle of adaptation to climate change.</p> <p>New homes should <u>Developers are strongly encouraged to incorporate the sustainable construction practices and technologies required to address the full range of aspects covered by the Code for Sustainable Homes and should strive to ensure that all homes meet a minimum of Level 3 of the Code, for Sustainable Homes, rising to a minimum of Level 4 for dwellings constructed in or after 2013. Later phases (post 2016) should include a significant proportion of homes that meet Levels 5 and 6 of the Code. Where feasible and viable, homes achieving higher levels of the Code will be expected, particularly within the second and third Core Phases.</u></p> <p><u>Developers are strongly encouraged to ensure that A</u>all non-residential development in the neighbourhood should <u>meets</u> a BREEAM standard of at least ‘Very Good’ or its equivalent</p>	9.22 9.24 9.25 9.26 9.27

Page	Policy/ Para	Recommended Change	Report Ref
		<p>under any replacement code, with a proportion of buildings meeting the ‘Excellent’ standard.</p> <p>In the event that, for viability reasons, the developer considers the full requirements for sustainability can not be met in part or all of the development, the local planning authority will need to be satisfied fully that this is the case. In these circumstances it will discuss with the developer how and to what extent the requirements might be amended.</p> <p><u>An Environmental Infrastructure Area should be provided adjacent to the neighbourhood centre to include facilities that will be necessary for the development to meet the required environmental and sustainability performance standards.</u></p>	
42	4.84	The depth of the tipped area <u>fill</u> ranges between ...	1.9
44	4.86	Since the Preferred Options stage further <u>evaluation of the options for</u> land remediation work has been undertaken...	1,9
44	4.87	To date, assessments have identified some issues of contamination throughout the site, primarily related to soil contaminations, <u>groundwater</u> leachate and methane concentrations.	1.9
44	4.89	The first stage is the surrender of the Waste Licence by the Environment Agency (EA), which if surrendered. <u>This surrender occurred in January 2009 and</u> means the site ...	9.31
44	4.90	The Closure Plan has effectively been <u>was agreed is in the final stages of agreement</u> with the Environment Agency <u>in 2008</u> . It is anticipated that The application for the Waste Licence surrender should be <u>was</u> submitted to the Environment Agency <u>in autumn October 2008</u> , following two years of post closure monitoring, <u>and was approved in January 2009</u> . The Environment Agency have four months to determine the surrender application. It has been concluded, in consultation with the Environment Agency, that the surrender of the Waste Licence should be forthcoming provided the developers promoting the site carry out the programme of works they have agreed with the Environment Agency.	9.31
45	4.91	<i>Delete the ¶.</i>	9.33
45	4.92	As the entire site is to be developed and the existing landform modified to accommodate the development, all options have the potential to form part of the remediation strategy. <u>the remedial strategy...</u>	
45	WB23	Development of the former inert landfill site is subject to: <ul style="list-style-type: none"> • The surrender of the waste management licence has been achieved; • The approval ... 	9.31
46	4.99	<ul style="list-style-type: none"> • Review existing transport- assessments produced ... 	1.9
47	4.100	... Peter_Brett Associates (May 2007) ... Steer Davies_Gleave (May 2007)	1.9

Page	Policy/ Para	Recommended Change	Report Ref
47	4.101	... highway infrastructure context, West of Bewbush ...	1.9
47	4.102	<p>.. Hence, to address this issue, a <u>number of studies have been undertaken, including:</u></p> <ul style="list-style-type: none"> • full <u>Draft transport assessment</u>, <u>May 2008</u> • <u>Addendum Report, July 2008</u> • <u>Local Model Validation Report, August 2008</u> • <u>Detailed Junction Assessment Report, August 2008</u> • <u>Supplementary Report on the Relief Road, October 2008</u> <p>The last three reports have been summarised in a report titled <u>'Summary of Further Technical Evidence Submitted to WSCC/HA Since July 2008', November 2008. These reports forms part of this Joint Area Action Plan's evidence base.</u></p>	9.36 9.41
48	4.107	<p>Three access points for <u>public transport buses and fastway</u> should be delivered at:</p> <ul style="list-style-type: none"> • Sullivan Drive, Bewbush (bus gate <u>for bus and Fastway</u>) • Woodcroft Road, Ifield West (bus gate <u>for bus only</u>) ... 	9.36 9.41
49	4.109	... an access <u>during phase 1</u> for the early phases of development, but on completion of the neighbourhood will operate as an emergency access only <u>or limited access for necessary or sustainable modes of transport.</u>	9.36 9.41
49	4.110	... form of additional lanes <u>a conversion to a signalised layout.</u>	9.36 9.41
50	4.111	In the context of w <u>West of Bewbush</u> ...	1.9
50	4.113	<p>In light of all the development occurring in the sub region, the transport assessment indicates that improvements are needed <u>along the A264/A2220 corridor towards the town centre and particularly at the A23/A2220 and at the A264/A2220 junctions to the Faygate Junction to increase capacity. West Sussex County Council are fully aware of the future pressures likely to be placed on this corridor and are examining the opportunities for junction improvements. The developers of West of Bewbush will make proportional contributions for junction improvements, in conjunction with</u> The details of the <u>required improvements are to be determined through the preparation of a Transport Assessment for the neighbourhood, which will need to be agreed as part of the planning application process. The County Council as Highway Authority will assess the traffic impacts of other strategic developments on this corridor and will use their best endeavours to secure financial contributions to improve the highway infrastructure in proportion to the traffic impacts of those developments in the sub region that will create pressure on the junction.</u></p>	9.36 9.41
50	4.115	... an eastern bridge for pedestrians, cyclists, <u>equestrians,</u> public transport and emergency vehicles ...	9.11
51	4.117	... WWR will need to <u>be</u> safeguarded. The southern section of	6.4

Page	Policy/ Para	Recommended Change	Report Ref
		<p>the WRR safeguarding is shown on the Conceptual Masterplan, safeguarding through the remainder of the development site will be determined at the planning application stage. The WRR safeguarding at the neighbourhood’s primary junction is shown indicatively on the Conceptual Masterplan. An agreed alignment for the WRR does not currently exist. However, although not shown on the Conceptual Masterplan, land to the west of the neighbourhood’s primary junction and link road is safeguarded for the period of 5 years from May 2009 or up to the date of the adoption of the last of the two Core Strategy Reviews to enable WSCC to fix the alignment of the WRR, if required. If a definitive decision confirming the requirement and alignment for a WRR were made then the confirmed alignment will be safeguarded for the remainder of the JAAP period (completion of the neighbourhood) to enable the delivery of the WRR.</p>	9.38
52	4.130	... with the developer, but t The developer ...	1.9
53	Photo	... will connect the various parts of <u>the</u> neighbourhood	1.9
53	4.132	<p>If in the fullness of time a station cannot be delivered it does not undermine the integrity of the Conceptual Masterplan and the neighbourhood principle that is trying to be achieved West of Bewbush. The role of the safeguarded land if a station was not to be provided will be the subject of detailed discussions with the Councils <u>although it is most likely to form an extension of the informal open space adjacent to Bewbush Brook. The Councils will to ensure that</u> any proposals conform with the neighbourhood principle and do not undermine the integrity of the Conceptual Masterplan.</p>	9.40
54	WB 26	<p>... and the appropriate core phase as set out in the Phasing and Delivery chapter:</p> <ul style="list-style-type: none"> • Pedestrian, and cycle <u>and equestrian</u> access into: <ul style="list-style-type: none"> • Ifield West • Bewbush • rural areas to the north and south across the A264 to the AONB • Three crossings of the railway, with two capable of accommodating vehicular traffic • <u>Bus and Fastway</u> access at: <ul style="list-style-type: none"> • Sullivan Drive, Bewbush (bus gate) • <u>Bus access at:</u> <ul style="list-style-type: none"> • Woodcroft Road, Ifield West (bus gate) • The primary A264 junction • A proportional contribution to the improvement of the route through Ifield West to the Town Centre to enable it to meet Fastway standards • Measures to secure and maintain suitable bus and Fastway 	9.11 9.36 9.41

Page	Policy/ Para	Recommended Change	Report Ref
		<p>services to the neighbourhood during construction and for the first 3 years after completion of the neighbourhood</p> <ul style="list-style-type: none"> • Provision of a primary highway access onto the A264 to be provided in the form of a roundabout, potentially improving the access arrangements into Holmbush Potteries Industrial Estate • Provision of a secondary left in, left out and right in access onto the A264 for emergency vehicle access only <u>or limited access for necessary or sustainable modes of transport</u> • <u>Delivery of Jjunction improvements at the A23/A2220 to mitigate the impacts of West of Bewbush or additionally utilising proportional contributions towards improvements which take account of the traffic impacts of other developments allowed for within the Transport Assessment of the neighbourhood to be prepared and agreed as part of the planning application process</u> • A proportional contribution to junction improvements at Junction 11 of the M23 • <u>Delivery of A proportional contribution to junction improvements at the A264/A2220, the Faygate Junction to mitigate the impacts of West of Bewbush or additionally utilising proportional contributions towards improvements which take account of the traffic impacts of other developments allowed for within the Transport Assessment of the neighbourhood to be prepared and agreed as part of the planning application process</u> • A Travel Plan Strategy • <u>All transport improvements are subject to the preparation of a Transport Assessment for the neighbourhood, which will need to be agreed as part of the planning application process. This may determine other improvements are necessary or demonstrate identified improvements are not required</u> 	
55	4.137	<p>Post 2010, through AMP5 (April 2010 to March 2015) Thames Water will be applying for funding to secure infrastructure upgrades to meet anticipated development levels, as set out in the <u>provide capacity up to 2021 based on and in accordance with the housing requirements of the Secretary of State's South East Plan Proposed Changes, which includes the provisions of this JAAP and the development allocated in Crawley Borough Council's Core Strategy (November 2007) and this JAAP.</u> AMP5 is to be submitted to OFWAT October 2009 and if the application for funding is successful new infrastructure upgrades could be in place by 2012.</p>	9.42
57	5.3	<p>On completion of <u>Core Phase Two</u> the phase will be accessed via the primary A264 access and link road.</p>	5.3 9.41
57	5.4	<p>... access across Spring Spruce Hill Brook</p> <p>... Also, residents will be able to use the Fastway service 10,</p>	5.3 9.41

Page	Policy/ Para	Recommended Change	Report Ref
		<p>that should <u>will</u> have been extended into the site via the bus access at Sullivan Drive, Bewbush. It is possible development of the neighbourhood centre could commence in conjunction with development of this phase.</p>	
58	5.5	<ul style="list-style-type: none"> • Primary A264 Junction • Development of the link road to south of Pondtail Shaw <u>Commencement of the primary A264 junction for initial use for construction traffic ...</u> • Pedestrian access across Spring Spruce Hill Brook • <u>Commencement of the eastern railway crossing (to facilitate development of Core Phase Two) ...</u> <p><i>Add at the end:</i></p> <ul style="list-style-type: none"> • <u>Delivery of the potential CHP facility as part of the Environmental Infrastructure Area adjoining the neighbourhood centre.</u> 	5.3 9.27 9.33 9.41
58	5.6	<p>The process for <u>surrendering the Landfill Waste Management Licence and then remediating the landfill commenced in 2006 following the closure of the landfill. It will conclude in late 2012 to facilitate the development of Core Phase Two. Licence surrender and remediation of the former inert landfill site will commence in 2008 and conclude in early 2012 to facilitate the development of Core Phase Two.</u> Remediation will be broadly undertaken in accordance with the following key milestones:</p> <ul style="list-style-type: none"> • Waste Management Licence surrender application submitted to EA – June <u>October 2008</u> • Waste Management Licence surrendered – January <u>early 2009</u> • Agreement of remediation strategy with Horsham District Council – April/June <u>2010</u> • Bewbush Brook realignment – June/September <u>2010</u> • Earthworks and remediation Core Phases One and Two – July/December <u>2010 – Autumn 2010 to Autumn 2012</u> • Core Phase One Infrastructure – July 2010 / March <u>2011</u> • Ground improvements / foundations Core Phase Two – January/June <u>2011</u> • Earthworks and remediation for Core Phase Three – March/November <u>2011</u> <p><i>Add at the beginning:</i></p> <p><u>For the purposes of development management and clarity, the following definitions have been adopted in order to define the spatial distribution and timing of the activities set out below;</u></p> <p><u>Remediation:</u></p> <p><u>The excavation, sorting, treatment and ultimate off-site disposal of contaminating materials or materials that could</u></p>	5.3 9.33

Page	Policy/ Para	Recommended Change	Report Ref
		<p><u>give rise to contamination.</u></p> <p><u>Ground Improvement and Foundations:</u></p> <p><u>The re-grading and improvement of the ground to provide a stable and well graded development platform followed by the installation of appropriate foundations (including any necessary gas protection measures incorporated in individual dwellings) and topsoil.</u></p> <p>The process for <i>..[as existing]..</i> the following key milestones:</p> <ul style="list-style-type: none"> • Waste Management Licence surrender application submitted to EA – June <u>October</u> 2008 • Waste Management Licence surrendered – early <u>January</u> 2009 • Agreement of remediation strategy with Horsham District Council – April/June 2010 • Bewbush Brook realignment – June/September 2010 • Earthworks and remediation <u>Core Phase One and remediation Core Phase Two</u> – July/December 2010 <u>Autumn 2010 to Autumn 2012</u> • Core Phase One Infrastructure – July 2010 / March 2011 • Ground improvements and <u>foundations</u> Core Phase Two – January/June 2011 <u>2013/4 to 2016/7</u> • Earthworks and remediation for Core Phase Three – March/November 2011 	
59	5.8	<p><i>In the last line:</i></p> <p>...the <u>potential</u> rail station...</p>	
59	5.10	<p>Furthermore, a small convenience <u>centre</u> <u>mixed use development</u> may be developed north of the railway to meet the needs of Ifield West.</p>	5.3
59	5.11	<ul style="list-style-type: none"> • <u>Completion of primary A264 Junction</u> • <u>Completion of development of the link road to south of Pondtail Shaw</u> • The road infrastructure to the neighbourhood centre • Development of the central railway crossing will commence • <u>Completion of eastern railway crossing</u> • Bus/Fastway <u>access at Woodcroft Road, Ifield West</u> • Bus/Fastway <u>links to the neighbourhood centre from the A264 and Bewbush</u> • <u>Completion of an A-CHP plant Environmental Infrastructure Area</u> adjoining the neighbourhood centre • A railway station and railway station parking (dependent on agreement from Network Rail) • Formal play area and club house 	5.3 9.27 9.41

Page	Policy/ Para	Recommended Change	Report Ref
		<ul style="list-style-type: none"> <u>Informal open space adjacent to Bewbush Brook</u> The Primary School – <u>land made available for onward completion in Core Phase Three</u> 	
60	5.15	<p><i>Add the following:</i></p> <ul style="list-style-type: none"> <u>Informal open space adjacent to Hoppers Brook</u> <u>Primary School</u> <u>Informal open space and other agreed uses on the land allocated for the Core Phase Two railway station and railway station parking, if it is not required for those latter purposes.</u> 	5.3 9.33
63	Table 2	<i>See Changes to Table 2 below:</i>	5.3 9.33

Task / Infrastructure	Delivery Agency	Funding source	Key Consultation / Responsible Bodies
Former Inert Landfill Remediation			
Waste Management Licence surrender application submitted	Developer	Developer	Environment Agency, Horsham District Council and Crawley Borough Council
Waste Management Licence surrendered	Environment Agency agree surrender	Developer	Horsham District Council and Crawley Borough Council
Agreement of remediation strategy	Horsham District Council agree strategy	Developer	Environment Agency
Earthworks and remediation Core Phases One and Two	Developer	Developer	Environment Agency, Horsham District Council and Crawley Borough Council
Earthworks and remediation for Core Phase Three	Developer	Developer	Environment Agency, Horsham District Council and Crawley Borough Council
Highway and Transport Infrastructure			
<u>Commencement of Primary A264 Junction</u>	Developer	Developer	Highways Agency, West Sussex County Council (as highway authority), Horsham District Council and Crawley Borough

			Council
Commencement of Development of link road to south of Pondtail_Shaw	Developer	Developer	Highways Agency, West Sussex County Council (as highway authority), Horsham District Council and Crawley Borough Council
Secondary A264 left in, left out and right in access	Developer	Developer	Highways Agency, West Sussex County Council (as highway authority), Horsham District Council and Crawley Borough Council
Pedestrian/cycle/equestrian access across Spring <u>Spruce Hill Brook</u>	Developer	Developer	Horsham District Council and Crawley Borough Council
Sullivan Drive, Bewbush bus/Fastway access	Developer	Developer	West Sussex County Council (as highway authority), the bus operator, Horsham District Council and Crawley Borough Council
Commencement of Eastern railway crossing	Developer	Developer	Network Rail, rail operator, Horsham District Council and Crawley Borough Council
Services and Facilities			
Formal open space	Developer	Developer	Horsham District Council and Crawley Borough Council
General Infrastructure			
Additional Sewage Capacity (to be delivered in light of the level of funding secured from OFWAT in 2009 towards Assets Management Plan 5)	Thames Water / Developer	OFWAT / Developer	OFWAT, Thames Water, Developer, Environment Agency and landowners

Page	Policy/ Para	Recommended Change	Report Ref
67	Table 3	<i>See Changes to Table 3 below:</i>	5.3 9.27 9.41

Task / Infrastructure	Delivery Agency	Funding source	Key Consultation / Responsible Bodies
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Highway and Transport Infrastructure			
<u>Completion of Primary A264 Junction</u>	<u>Developer</u>	<u>Developer</u>	<u>Highways Agency, West Sussex County Council (as highway authority), Horsham District Council and Crawley Borough Council</u>
<u>Completion of link road to south of Pondtail Shaw</u>	<u>Developer</u>	<u>Developer</u>	<u>Highways Agency, West Sussex County Council (as highway authority), Horsham District Council and Crawley Borough Council</u>
Road infrastructure to neighbourhood centre	Developer	Developer	West Sussex County Council (as highway authority), Horsham District Council and Crawley Borough Council
Woodcroft Road, Ifield West bus/Fastway access	Developer	Developer	West Sussex County Council (as highway authority), bus operator, Horsham District Council and Crawley Borough Council
Bus/Fastway links onto the A264	Developer	Developer	West Sussex County Council (as highway authority), bus operator, Horsham District Council and Crawley Borough Council
<u>Completion of Eastern railway crossing</u>	<u>Developer</u>	<u>Developer</u>	<u>Network Rail, rail operator, Horsham District Council and Crawley Borough Council</u>
Central railway crossing commences construction	Developer	Developer	Network Rail, rail operator, Horsham District Council and Crawley Borough Council
Rail Station and railway station parking	Developer	Developer	Network Rail, rail operator, Horsham District Council and Crawley Borough Council
Services and Facilities			
Combined heat and power plant <u>Environmental Infrastructure Area</u>	Developer / operator	Operator	West Sussex County Council (as waste authority), bus operator, Horsham District Council and Crawley Borough Council
Formal open space, including club house	Developer	Developer	Horsham District Council and Crawley Borough Council
Primary School – <u>land made available for onward completion in Core Phase Three</u>	Developer	Developer	West Sussex County Council (as education authority), bus operator, Horsham District Council and Crawley Borough Council

Neighbourhood centre (including 1250 – 2500 m2 of retail floorspace, approximately 8000 m2 of employment floorspace, approximately 700 m2 of community floorspace and Primary Care Centre)	Developer, or perhaps anchor convenience store retailer, or pre-let commercial developer	Developer, or perhaps anchor convenience store retailer, or pre-let commercial developer	West Sussex County Council, bus operator, Horsham District Council and Crawley Borough Council
General Infrastructure			
Additional Sewage Capacity (to be delivered in light of the level of funding secured from OFWAT in 2014 towards Assets Management Plan 6)	Thames Water / Developer	OFWAT / Developer	OFWAT, Thames Water, Developer, Environment Agency and landowners

Page	Policy/ Para	Recommended Change	Report Ref
70	Table 4	Table 4 Delivery of the elements of Phase Three <i>See Changes to Table 4 below:</i>	5.4 9.40

Task / Infrastructure	Delivery Agency	Funding source	Key Consultation / Responsible Bodies
Highway and Transport Infrastructure			
<u>Completion of central railway crossing</u>	<u>Developer</u>	<u>Developer</u>	<u>Network Rail, rail operator, Horsham District Council and Crawley Borough Council</u>
Western railway crossing (pedestrian, cycle and equestrian)	Developer	Developer	Network Rail, rail operator, Horsham District Council and Crawley Borough Council
Services and Facilities			
Formal open space	Developer	Developer	Horsham District Council and Crawley Borough Council
<u>Informal open space adjacent to Hoppers Brook</u>	<u>Developer</u>	<u>Developer</u>	<u>Horsham District Council and Crawley Borough Council</u>

North of the railway small area of mixed use development	Developer	Developer	Horsham District Council and Crawley Borough Council
<u>A Primary School</u>	<u>Developer</u>	<u>Developer</u>	<u>West Sussex County Council (as education authority), bus operator, Horsham District Council and Crawley Borough Council</u>
<u>If not required for a railway station and parking, then informal open space and other uses</u>	<u>Developer</u>	<u>Developer</u>	<u>Horsham District Council and Crawley Borough Council</u>

Page	Policy/ Para	Recommended Change	Report Ref
71	5.23	...select two, or three, RSL delivery partners... ...includes their status with <u>the</u> Housing Corporation...	1.9
72	5.26	...(AMP) 5 (April 2010 to March 2015)...	1.9
72	5.28	Horsham District Council has appointed a Major Development Planning Manager to provide a smooth transition between preparation and adoption of the Joint Area Action Plan and consideration and management of the applications related to the neighbourhood. <u>In late 2008 the Councils’ Cabinets approved the principle of establishing joint development management processes to jointly consider and determine planning applications relating to the JAAP. The specific nature of the joint consideration and determination mechanisms will be the subject of further Council reports. Furthermore, the principle of the Councils entering into a Planning Performance Agreement (PPA) was approved. The PPA was approved in early 2009. The precise nature of the joint working arrangements for this process are presently under consideration by both Councils. The Joint Members Steering Group has given early consideration and direction to the possible options and in this respect, the approach to determining the planning applications is likely to incorporate the following elements: Joint working by officers of both Councils in the form of a development team; Joint working arrangements with the principal external partners, i.e. WSCC as Highway Authority; A ‘Development Management’ approach to managing the planning applications (incorporating the principles of Planning Performance Agreements);</u>	1.9
73	5.29	<i>Delete the ¶.</i>	1.9
73	5.30	...delivery of development; the Councils will undertake...	1.9
73	5.31	PPS 12: <u>Local Development Frameworks Local Spatial Strategies (Paragraph 4.24 4.52)</u> outlines <u>nine the</u> tests of soundness, which a Development Plan Document should meet to be found sound. <u>The ninth test states Part of the ‘effective’</u>	1.9

Page	Policy/ Para	Recommended Change	Report Ref
		<p>test is that the plan should be reasonably flexible to enable it to deal with changing circumstances. This section sets out the flexibility and contingency that exists in bringing forward the neighbourhood.</p>	
74	5.35	<p>The Conceptual Masterplan does not include the development of the field west of the link road and south of Pondtail Shaw, which forms part of the firm western boundary of the development. The western boundary of the field runs adjacent to the Holmbush Farm entrance and the mature hedgerow that bounds the access. If the delivery in other Core Phases were to become constrained the opportunity exists to include this area as part of the development of Core Phase One, or retrospectively if delay were to occur late in the development of the neighbourhood This field although identified for informal open space is not required in its entirety to meet the requirements of WB 19. As a result, it is safeguarded for a period of 5 years from May 2009 or up to the date of the adoption of the last of the two Core Strategy Reviews to enable West Sussex County Council to agree an alignment for a Western Relief Road (WRR), if required, and provides a ‘contingency’ development site in the unlikely event of the delivery of dwellings in the Core Phases being delayed for technical reasons, for example remediation. If a definitive decision confirming the requirement and alignment for a WRR were made then the capacity of the land parcel as informal open space or a contingency development site would be reduced accordingly. The requirement for this land to be used as a WRR and/or a contingency development site will be established during Core Phase Two (subject to the adoption of the last of the two Core Strategy Reviews), which would allow the informal open space to be provided in Core Phase Three or earlier. If development is required in this locality however, it Therefore, in the absence of a definitive requirement, it is not possible at this stage to quantify the capacity of this contingency option. However, development in this locality would need to respect the landscape character of this parcel of land and its proximity to the Strategic Gap and provide a firm western boundary to development, possibly by the provision of landscaping. Theoretically, with this area being approximately 9.5 hectares and applying a minimum density of 30 dwellings per hectare this area could accommodate 285 of the 2500 dwellings.</p>	6.3 9.38
74	5.37	<p>Finally, should unforeseen circumstances occur and delivery was severely constrained the Councils’ Core Strategy reviews present the opportunity to explore alternative strategic development locations and manage delivery in this context. Table 1 illustrates how it is anticipated that the development will be complete by 2018. If circumstances such as the economic climate indicate that the development proceeds at a slower rate than anticipated then any shortfall in housing numbers will be addressed in the Councils’ Core Strategy reviews as set out in In accordance with the Longer Term Chapter, the Core Strategy reviews will demonstrate a strategy for delivering the development requirements of the</p>	6.6

Page	Policy/ Para	Recommended Change	Report Ref
		adopted South East Plan and the considerable shortfall from this Strategic Development Location, if it was to occur.	
75	6.1	... Core Strategies. These early Core Strategy reviews are already programmed and form part of the Councils’ current Local Development Schemes. As a consequence, ... will be adopted by the end of 20101 and mid 20142 respectively.	10.1
75	6.3	This Joint Area Action Plan does not refer to a specific plan period; however, tThe Strategic ... Joint Area Action Plan plans for, forms ...	2.9
75	6.4	<i>Delete.</i>	6.6
75	6.5	Therefore, iIn the context of this Joint Area Action Plan, reference to ... of the neighbourhood West and of Bewbush and the ...	6.6
76	6.6 to 6.15 incl	<i>Delete all the ¶s.</i>	10.1
78	6.16	... If this were to be the case the development would be planned for, and facilitated allocated through Horsham District Council’s Core Strategy review, or both Councils’ Core Strategy reviews and a further JAAP produced as the best mechanism of addressing cross boundary issues, particularly timely delivery and ensuring democratic involvement a Joint Area Action Plan review. This A Core Strategy allocation and a further Joint Area Action Plan review will be assisted ...	10.1
79	6.18	As a consequence of the pending recent High Court Challenges Judgements relating to the NES ... to continue for some considerable time. Crawley Borough Council’s Core Strategy review will bring forward a revised policy approach for the NES, if required, in light of any Government airport decisions, or the outcome of the re-opened NES Inquiry outcomes regarding the above. Furthermore, it is appropriate ...	10.1
80	6.20	<i>Delete the ¶.</i>	10.1
81	6.24	... will be designated as countryside on the Proposals Map.	1.9
81	6.25	... annotated on Crawley BOrough Council’s ...	1.9
81	WB 29	Area of Study outside the allocated land of policy WB 1	10.2
83	7.4	... and indeed the requirements of PPS12 in relation to Area Action Development Plans Documents ...	1.9
85	Monitoring Framework Table	<i>See Changes to the Table below:</i>	11.1





Indicator number	Indicator	JAAP/LDF Policy	Targets by 2018 unless otherwise specified
WB1	Condition of Landscape Character Areas L1, K2, I2 and K1 of the	WB 13	<ul style="list-style-type: none"> • Maintain or improve from current conditions • Retain Capon Copse and Pondtail Shaw

	Landscape Character Assessment		
WBC 2 1	Changes in <u>Condition of</u> areas designated for their intrinsic environmental value	WB 13 DCLG Core output indicator	<ul style="list-style-type: none"> Conserve and enhance areas and conditions of House Copse SSSI, Kilnwood Copse Ancient Woodland/SNCI and High Weald AONB
WB3	Changes in priority species and habitats by type	WB 13 DCLG Core output indicator	<ul style="list-style-type: none"> Conserve and enhance from baseline populations and conditions
WBC 4 2	Provision of green linkages	WB 15	<ul style="list-style-type: none"> Implementation of green linkages outlined in the Conceptual Masterplan
WBC 5 3	Development within identified flood hazard zones	WB 17	<ul style="list-style-type: none"> No built development within Bewbush Brook flood zone 2
WBC 6 4	Provision of flood attenuation and SuDS	WB 17	<ul style="list-style-type: none"> No net increase on pre development surface run-off levels
WBC 7 5	Housing Density	WB 4	<ul style="list-style-type: none"> Development to occur at no less than 30 dwellings per hectare <u>within each phase</u>
WBC 8 6	Delivery of educational facilities	WB 20	<ul style="list-style-type: none"> Provision of a one primary school <u>places amounting to between 2 and 3 forms of entry</u>
WBC 9 7	Delivery of health facilities	WB 6	<ul style="list-style-type: none"> Provision of a Primary Health Centre <u>with for</u> a minimum of three GP’s <u>surgeries</u>
WBC 10 8	Delivery of open space, sport and recreational facilities	WB 19	<ul style="list-style-type: none"> Provision of open space totalling 15.4 hectares <u>equally divided between informal open space and formal open space</u> <u>Provision equally divided between informal open space and formal open space</u>
WBC 11 9	Delivery of Community facilities	WB 5	<ul style="list-style-type: none"> A minimum of 700m² of indoor community facilities to be located at the Neighbourhood centre
WB12	Provision of financial contributions for community facilities	WB 5-9, 19 and 20	<ul style="list-style-type: none"> Securing contributions for community facilities including: health; education; libraries; open space, sport and recreation and community centre
WBC 13 10	Retail land supply	WB 9	<ul style="list-style-type: none"> Completion of between 1,250 and 2,500m² of retail floorspace within the neighbourhood centre

WBC-14 <u>11</u>	Supply of affordable housing	WB 11	<ul style="list-style-type: none"> • Delivery of <u>up to a minimum of 40%</u> affordable housing in each phase • Affordable housing delivered within each phase comprising 70% social rented and 30% intermediate tenure housing, subject to <u>up-to-date assessments as indicated in the policy</u> Housing Corporation grant availability
WBC-15 <u>12</u>	Mix of affordable homes	WB 11	<ul style="list-style-type: none"> • Affordable housing provision to comprise sizes and types as set out in the Joint Housing Position Statement <u>up-to-date housing market and needs evidence - for example, in the most recent Strategic Housing Market Assessment</u>
WBC-16 <u>13</u>	Supply of supported (non-general) needs housing	WB 11	<ul style="list-style-type: none"> • A minimum of 5% <u>proportion</u> of all affordable dwellings to be fully adapted for wheelchair users (<u>approximately 2%</u>) • A minimum of 20% <u>proportion</u> of affordable dwellings <u>encouraged</u> to meet Lifetime Homes Standards (<u>approximately 20%</u>)
WBC-17 <u>14</u>	Employment land supply by type	WB 21	<ul style="list-style-type: none"> • Completion of at least 8,000m² (<u>gross internal</u>) employment floorspace (B use classes)
WB-18	Delivery of energy infrastructure	WB-22	<ul style="list-style-type: none"> • Completion of a ‘community energy and/or heat system’ including a CHP plant and ESCo establishment by 2015/16
WBC-19 <u>15</u>	Renewable/Low-carbon energy generation capacity installed by type	WB 22	<ul style="list-style-type: none"> • A minimum of 5<u>10%</u> of the new neighbourhood’s overall (non-transport) annual energy requirements <u>encouraged</u> to <u>be</u> generated from on-site <u>decentralised</u> renewable and low-carbon sources by 2018
WB20	Renewable/Low-carbon Energy (including hot water) generated on site that is consumed off site	WB-22	<ul style="list-style-type: none"> • Maximise sale of site-generated renewable/low-carbon energy to achieve a near net ‘zero carbon development’ by 2018 • Potential to achieve full net ‘zero carbon development’ beyond the plan period
WBC-21 <u>16</u>	Environmental and sustainability performance of buildings <u>The proportion of all homes meeting Level 3 or above of the CSH</u>	WB 22	<ul style="list-style-type: none"> • All homes completed from 2011 to 2013 to achieve Level 3 or above of the CSH • All homes completed from 2013 to 2016 to achieve Level 4 or above of the CSH • Homes completed after 2016 to achieve a broad mix of Levels 4, 5 and 6 of the CSH • All relevant non-residential development to achieve a mix of ‘Very Good’ and

			‘Excellent’ levels of BREEAM or equivalent <ul style="list-style-type: none"> 100% is being encouraged by Policy WB22
WC17	The proportion of all relevant non-residential buildings meeting BREEAM ‘Very Good’ or above	WB22	<ul style="list-style-type: none"> 100% is being encouraged by Policy WB22
WBC-22 18	Delivery of transport infrastructure	WB 26	<ul style="list-style-type: none"> Delivery of road, cycling, pedestrian, equestrian and public transport infrastructure for each core phase as set out in the Phasing and Delivery chapter
WBC-23 19	Distance to public transport	WB 26	<ul style="list-style-type: none"> All residential, employment and community development to be within 400m (5 minute walk) of a bus stop
WBC-24 20	Landfill remediation	WB 23	<ul style="list-style-type: none"> Commencement of remediation by mid 2010 Completion of remediation by end 2011/12
WB25	Number of dwellings completed in new neighbourhood, west of Crawley	WB 1	<ul style="list-style-type: none"> 2,500 dwellings by 2018
WBC-26 21	Annual and phased completion of dwellings	Chapter 5 of JAAP	<ul style="list-style-type: none"> Average of 357 per year, 2011 to 2018 600 completed in core phase one by 2013/14, 1050 in core phase two by 2015/16 and 850 in core phase three by 2017/18

Page	Policy/ Para	Recommended Change	Report Ref
91	Heading	Chapter 8: Conclusions and Next Steps	1.9
91	8.1	This document will forms part of ...	1.9
91	8.2 to 8.5 inclusive	Delete all the ¶s.	1.9
93	Housing Trajectory	Change to as shown in Annex B.	12.2
94	Housing Trajectory	Change to as shown in Annex C.	12.2
96	Glossary	Core Phase A Core Phase relates to the stage at which development takes place. The document identifies three core phases of development for the land West of Bewbush.	12.3

Page	Policy/ Para	Recommended Change	Report Ref
97	Glossary	<p>Environmental Infrastructure Area</p> <p>The Environmental Infrastructure Area is an area within which facilities of communal environmental infrastructure are located such as waste management facilities, renewable/low carbon energy generation/transmission and water recycling facilities that are required in order for the development to meet the environmental and sustainability performance standards required by this JAAP.</p>	9.27
99	Glossary	<p>Strategic Locations</p> <p>...The precise locations and boundaries, mix of uses, and phasing of development to be identified in the relevant local plan i.e. in this District the Horsham District Local Development Framework Horsham District the Horsham District Local Development Framework and in Crawley Borough the Crawley Borough Local Development Framework.</p>	1.9
100	Glossary	Move “Stakeholder” definition to previous page into alphabetical order	1.9
100	Glossary	<p>Strategic Location</p> <p>Delete definition.</p>	1.9
101	Glossary	<p>Zero Carbon</p> <p>Delete definition and insert instead:</p> <p>The definition of ‘zero carbon’ homes has changed a number of times in recent years as the national policy in this area has evolved. The latest officially recognised definition may be found in the most recent version of the ‘Code for Sustainable Homes – Technical Guide’ published by the DCLG (currently October 2008) and available on their website.</p>	9.23
	Conceptual Masterplan	Replace the  in the north-west corner with 	9.11
	Conceptual Masterplan	Replace the  that crosses the A264 with 	9.11
	Conceptual Masterplan	Remove the oblong section of the Highway Infrastructure Safeguard to the west of the link road and east of the landscape and buffering annotation.	9.37
	Conceptual Masterplan	Combined Heat & Power Plant <u>Environmental Infrastructure Area</u>	9.27
	Conceptual Masterplan	Bus/pedestrian/cyclist/equestrian/emergency vehicle link to double-headed yellow arrow notation.	9.11
	Conceptual Masterplan	<p>Archaeological Sites & Parkscales</p> <p>Remove the notation from the Masterplan.</p>	9.10
	Conceptual Masterplan	“Spruce Hill Brook” and “Kilnwood Lane” to be clearly labelled on the Conceptual Masterplan	1.9
	Conceptual Masterplan	“Holmbush Farm Access” and “Landfill Site Access” to be clearly labelled on the Conceptual Masterplan	1.9

Page	Policy/ Para	Recommended Change	Report Ref
	Conceptual Masterplan	“Hoppers Copse” to be clearly labelled on the Conceptual Masterplan	1.9
	Conceptual Masterplan	“Poplar Copse” to be clearly identified on the Conceptual Masterplan	1.9

Annex B

Period 2011-2018	Projected Completions / Development Phasing							Check
	2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	
Market Housing	90	210	240	240	240	240	240	1500
Affordable Housing	60	140	160	160	160	160	160	1000
It is anticipated that the development completions set out above will be delivered according to the phasing below								
Core Phase One of SDL	150	350	100					600
Core Phase Two of SDL			300	400	400 250	100		1,100 1,050
Core Phase Three of SDL					150	400 300	400	800 850
Projected annual completions	150	350	400	400	400	400	400	2,500
Cumulative projected completions	150	500	900	1,300	1,700	2,100	2,500	
Plan: Core Strategy requirement annualised over 8 years	357	357	357	357	357	357	358	2,500
Monitor: Position above/below zero indicates how many dwellings above or below the cumulative allocation at any point in time	-207	-214	-171	-128	-85	-42	0	0
Manage: Annual requirement taking account of projected completions	357	392	400	400	400	400	400	0

Annex C

West of Bewbush Housing Trajectory – Completions and Phasing

