WEST SUSSEX STRUCTURE PLAN

Examination in Public

WSSP EIP Office
Environment and Development
West Sussex County Council
The Grange
Chichester
West Sussex PO19 1RH

Panel Secretary: Mr A R Chetwynd
Programme Officer: Miss Anna Smith

Mark Hammond Esq.
Director for Environment and Development
West Sussex County Council
The Grange
Tower Street
Chichester
West Sussex PO19 1RH

28 February 2003

Dear Mr Hammond

WEST SUSSEX STRUCTURE PLAN 2001-2016

We were appointed by the First Secretary of State to conduct an Examination in Public to inquire into selected aspects of the deposit draft of the West Sussex Structure Plan 2001-2016 dated November 2001. The Examination was held at The Venue, Chichester, between 26 November-13 December 2002.

We now have the pleasure to present our Report.

Yours sincerely

BARRY TURNER
MRICS, MRTPI, DiP TS
Chairman

JOHN SHEPPARD
BSc, MPhil, FRICS, FRTPI
Inspector

WEST SUSSEX STRUCTURE PLAN
2001-2016

EXAMINATION IN PUBLIC

REPORT OF PANEL

February 2003

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A Issues discussed and invited participants

B Programme of proceedings

C Statements submitted to the EiP

D Library of reference documents

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PREAMBLE

0.1. This Report follows the Examination in Public (EiP) into the Deposit Draft of the West Sussex Structure Plan 2001-2016 dated November 2001 (DDSP). The DDSP covers the period up to 2016, and it is intended, after formal processes, to replace the Approved Structure Plan (ASP) which had been adopted in 1993. An earlier proposed revision to the ASP had been considered at an EiP in 1997, but it was not formally adopted, following a Direction by the Secretary of State.

0.2. The DDSP was formally on deposit for comments and objections between 4 January and 15 February 2002. A total of 29,790 separate representations were received from 4,505 individuals and organisations. Arising from those representations a number of issues for discussion at the EiP were selected by the County Council in consultation with the Panel, and participants were invited to take part in the EiP on the basis of those representations or their expert knowledge. The issues which were examined, and those who were invited to take part, are listed in Appendix A.

0.3. As a result of their initial consideration of the representations made on the DDSP, the County Council suggested some changes (the "Proposed Changes") which could be made to the DDSP to meet specific objections, to update the plan, or to correct errors. These proposed changes were available for public comment from 2 August-13 September 2002. We have taken account of them to the extent that they relate to the issues under discussion.

0.4. We held a preliminary meeting into matters to do with the running of the EiP on 19 September 2002, at The Venue, Spur Road, Chichester. The EiP itself was held on 26-29 November, 3-6 December, and 10-13 December 2002, also at The Venue.

0.5. We undertook an unaccompanied tour of the county before the EiP took place.

0.6. The discussion at the EiP took place on the basis that the statements of case submitted by participants were taken as read. These statements were circulated to participants in advance, and they should be taken as representing participants' considered views on the issues under discussion, unless otherwise recorded in our Report. The proceedings were recorded on audio cassette, and these recordings should be taken as the definitive record.

0.7. We are grateful to all participants for the clarity and good humour with which they expressed their views, which has assisted us greatly in our deliberations, and particularly to the County Council officers who inevitably had to bear the brunt of our at times insistent questioning. We are also grateful to the officers of the EiP, our Secretary Roger Chetwynd and Programme Officer Anna Smith, for their efforts in securing the smooth running of the EiP and subsequent production of our Report.

CHAPTER 1

INTRODUCTION AND SUMMARY

Panel Overview

1.1. We commend the County Council for producing a comprehensive though concise structure plan. We found its format a little unusual but we understand the reasons for its adoption. If it has a downside, from our point of view it is the fact that policies on particular matters tend to be found in a number of places rather than concentrated and this results in a certain lack of cohesion. That said, we do not hold strong views on the matter and it is not one on which we would wish to make any general recommendation. However, where we consider it to present a particular problem we have proposed appropriate changes.

1.2. In terms of content we find the plan sound and robust in many respects. There are numerous areas where we are satisfied with the general thrust of policy, though we do recommend some adjustments. We feel that the balance between people, homes and jobs to be about right, we are content with the overall development strategy with its emphasis on concentration of development in and on the edge of the main towns, we see no need for any adjustment to the broad allocation of dwellings or employment floorspace between districts and we are satisfied in general terms with provisions relating to previously developed land and affordable housing. Overall we would also say that the content of policies for transport, employment and rural areas are on the right track. As regards the proposed strategic locations, we endorse with appropriate caveats those proposed as urban extensions to Crawley, Horsham and East Grinstead and that in the west of Arun district.

1.3. There are nevertheless some elements of the plan which we have identified for fairly significant change and others where change, though perhaps less fundamental, would in our view improve the plan considerably and clarify its intentions. We summarise these below and we commend them to the County Council. We thank the officers of the County Council for the willingness that they have already shown during the EiP discussions in being adaptable and helpful in taking things forward where there are differing views on the direction the plan should be taking.

Principal changes

1.4. These are the areas where we recommend major change:

(i) More emphasis needs to be given to the Crawley/Gatwick area in the context of RPG9. In particular an area based approach to housing and employment allocations needs to be adopted.

(ii) Policy LOC1 should be rewritten partly to recognise the importance of growth at Crawley/Gatwick but also to achieve a better understanding of its component parts and how they relate.

(iii) Burgess Hill should be deleted as a proposed strategic location. We are not convinced that it will provide benefits to either Crawley/Gatwick or the coast, and it would present formidable transport and environmental problems in our view.

(iv) The strategic location at Chichester should become less specific given particular problems associated with development to the south west of the town.

(v) Tangmere should not be proposed as a strategic location but its needs should be considered in the context of the wider Chichester area.

(vii) The strategic locations should not be subject to phasing as proposed, which we believe to be unworkable in practice and potentially detrimental to the delivery of the housing requirement.

(viii) The concept of strategic gaps should be abandoned and replaced with a policy which is concerned with avoiding coalescence and safeguarding the character and identity of all settlements.

Other significant changes

1.5. We further propose these changes to address some of the more significant concerns raised by participants:

(i) Policy LOC2 should deal only with locational matters. A new rural needs policy should include those matters displaced as well as farm diversification, and together these policies will provide a clearer guide to the appropriate overall balance needed in rural areas.

(ii) Policy NE3 needs to be redrafted to provide clarity on monitoring and the release of housing land.

(iii) Policy NE4 needs to be redrafted to bring together and clarify provisions for the monitoring and release of employment land.

(iv) Greater emphasis needs to be given to the role of Shoreham Airport and Harbour in coastal regeneration.

(v) There is need for an overarching policy on transport so that the plan's approach to transport is clarified and seen to be balanced.

(vi) Policies in the Character chapter should be rationalised to avoid duplication and reference to non-strategic matters.

(vii) Policy DEV3 should be redrafted to provide clearer guidance on infrastructure requirements.

Key considerations

1.6. Obviously there are many matters to which we have had regard in reaching our conclusions and making recommendations. However, four stand out for special mention and they are themes which run through our report. Firstly we place great emphasis on the need to deliver the required quantum of housing. It is a key plank of government policy and we must avoid the problems of the past when, for whatever reasons, rates of building have not kept pace with apparent need. Secondly, and

related to this we see the operation of a robust plan, monitor and manage system as fundamental in ensuring that things do happen and at the right time in the right place. Thirdly, development must go hand in hand with the delivery of sustainable transport in all its aspects. Too much traffic is already causing economic, environmental and health problems and it is vital that travel habits change. The structure plan offers a great opportunity to influence that change. Lastly, we are keen to see flexibility in policy so that it is able to react to changes and to particular local circumstances whilst not being so vague as to be without teeth.

Further action

1.7. We have taken the opportunity in the report to refer to further action that is required to take the plan's various provisions forward and we would reiterate the principal requirements here since we consider them to have some importance. Firstly there are two specific joint studies emanating from RPG9 and these need to be progressed as a matter of priority. One relates to developing a strategy for the Sussex Coast and Towns Priority Area for Economic Regeneration (PAER) and the other to the process by which the coastal areas may benefit from economic growth in the Crawley/Gatwick area. Secondly there is a need to start thinking about where capacity exists for future growth. We appreciate that this is essentially a matter for a subsequent plan in whatever form that might take, but major development in this plan period needs to have regard to what might be possible subsequently and in any event, there could be circumstances where some of that capacity might be needed sooner. Thirdly, we should like to stress the value and importance of involving local people in the planning of major development. This accords with the concept of partnership referred to in the introduction to the plan and will assist in the identification of issues and their resolution in the most acceptable way.

Organisation of the report

1.8. The chapters of the report follow the sequence of issues identified for discussion. Each chapter includes an explanation of the background and itemises the main issues to be addressed. The arguments that are put forward by the various participants are discussed in general terms and we comment on them. We draw some overall conclusions before setting out our detailed recommendations at the end of each section of the report. Since those recommendations are set out by issue, the changes we propose to particular policies are not always contained in one place. To address this we have included an appendix which lists the recommendations by policy. We also include an appendix which lists the detailed matters identified for debate at the EiP since these sometimes differed from those originally identified. The reason for this is that statements drew attention to particular areas of contention under the originally identified headings and it aided discussion to focus on these rather than on a more general question. Readers will note that the report relates in most instances to the original headings.

CHAPTER 2

ISSUE 1 THE REGIONAL CONTEXT

Does the Development Strategy adequately reflect Regional Planning Guidance (RPG9)?

ISSUE 2 PEOPLE, HOMES AND JOBS

Should the plan seek to maintain or change the existing balance and distribution of people, homes and jobs in the county?

Background

2.1. Issues 1 and 2 cover some general matters which are at the root of the DDSP's development strategy and provide an introduction to the overall EiP debate by allowing a look in very broad terms at some of the key issues arising out of the plan. It was WSCC's specific wish that these matters be considered. Having studied the statements under these two issues and noted some common themes we decided to consider them together at the EiP so that we did not have to go over the same ground twice. Though originally intending to write them up separately we have decided to bring them together in this first section of our report. Recommendations that stem from our conclusions here are generally contained in other sections of the report, though we do make recommendations in respect of Policies NE1 and NE7 since we consider this the most appropriate place to do so.

2.2. With regard to Issue 1 we deal with the relevant objectives of RPG9 under headings that reflect the issues identified. WSCC believes that the plan, through its general thrust, will achieve these objectives. Many participants are less certain. On the matter of balance between people, homes and jobs we are concerned here with the broad balance across the county and between districts having regard to the plan's objectives and to RPG9. Specific aspects of balance are considered in greater detail in other sections of the report. One reason for bringing Issues 1 and 2 together is that concerns about balance can more readily be considered by reference to the plan's relationship with RPG9.

The main issues

2.3. The main issues under these two headings are these.

(a) Does the Development Strategy adequately reflect the intentions of RPG9 with regard to (i) the Western Policy Area, (ii) coastal regeneration and (iii) the rest of the county?

(b) In reality, how can coastal areas benefit from economic growth in the north east of the county and how far does the plan nurture this link?

(c) What should be the relationship between the level of residential and employment development?

(d) What should be the broad distribution of the overall dwellings requirement between the districts?

(e) What should be the broad distribution of employment floorspace between the districts?

The Western Policy Area

2.4. In chapter 4 on core strategy and chapter 12 on sub-regional areas RPG9 makes reference to the Western Policy Area (WPA), an economically very buoyant area west and south of London, extending to Gatwick Airport in the south. Paragraphs 12.55-58 deal specifically with the Crawley/Gatwick/M23 area as one of three sub regions where local authorities can build upon the collaborative approaches which they have already initiated in order to tackle cross boundary issues. This area, according to RPG9, is centred upon Crawley, Gatwick and Horley but its influence extends in West Sussex to Horsham, East Grinstead, Haywards Heath and the south coast. It sees Gatwick Airport as the single most important element of the area's economy and of significant economic importance to the region as a whole.

2.5. WSCC points to paragraph 12.46 which states that in order to achieve sustainable development, further growth in the WPA needs to occur in a form which minimises the additional pressures on land and labour resources. It maintains that its strategy for large scale mixed use development at locations within the influence of the WPA, together with the encouragement of high value added, high production employment is in line with this requirement. A number of participants, notably CADIA, Crawley BC and English Partnerships believe that insufficient emphasis is given to growth specifically in the Crawley/Gatwick area which they say should be a clear focus for growth and given a pre-eminent position in the plan. Some see the locations for strategic development identified on the periphery of the WPA's area of influence as a distraction in this respect and a dilution of the approach required by RPG9. Horsham DC and others think there is not enough emphasis on the A23 corridor.

Emphasis on Crawley/Gatwick

2.6. We accept Mid Sussex DC's point that Crawley/Gatwick is not one of the potential growth areas identified in RPG9 and we note its view that there needs to be moderation and caution in respect of development there. WSCC argues that its approach, as described in paragraph 5 above reflects that need for caution. At issue is whether the DDSP has correctly interpreted RPG9's strategy in respect of the Crawley/Gatwick/M23 sub regional area. Is perhaps WSCC being over-cautious? We place weight on the statement in RPG9 paragraph 12.55 that the area is centred upon Crawley, Gatwick and Horley, (Horley is in Surrey and outside our remit), and we agree with SEERA that development should be located as close as possible to this centre. Indeed RPG9 paragraph 12.58, relating to the joint working required, seeks housing in accessible locations <u>locally</u> (our underlining) and this supports SEERA's point.

2.7. That said, we share WSCC's concern about concentration causing overheating at Crawley/Gatwick and we acknowledge that there are physical and social constraints associated with growth there as well as this economic constraint. In that context we would see some difficulty in simultaneously progressing three full sized neighbourhoods which each physically adjoin Crawley in the plan period, and we have concerns about the impact on and the implications for the town, and about the

effects on the local housing market. Given these constraints we can see the value, with caveats regarding accessibility and proximity, in spreading growth to nearby towns so that it brings wider benefits as WSCC proposes. We say more about this in paragraphs 2.15 to 2.17 below. Nonetheless we do recognise that much of this growth is related to Crawley/Gatwick and we have some sympathy with the view of Crawley BC and others that the plan does not necessarily reflect this or make it clear, even though it is accepted by WSCC.

2.8. Drawing upon our conclusions on Issues 5, 6 and 9 we do not see a need to increase housing or employment land allocations in respect of the sub-region, but we do consider that policy should better reflect the reality of the situation regarding such allocations in the area and RPG9's apparent emphasis on Crawley/Gatwick in particular. As regards housing, we do not believe it feasible to precisely indicate what proportion of the Horsham and Mid Sussex housing allocations are attributable to growth at Crawley/Gatwick. Indeed we doubt that accurate figures could be drawn up; it is more a matter of perception. In the circumstances we consider that Policy NE1 should cover this point by way of a note which explains the philosophy, with greater detail in the EM and cross reference to a revamped Policy NE7 as discussed below.

2.9. Turning to employment we conclude under Issue 9(i) that there should be a strategic employment allocation relating to the Crawley/Gatwick area comprising components of the Horsham and Mid Sussex allocations as well as that for Crawley. This would aid and support recognition of the area's importance as a location for strategic employment growth, not least associated with Gatwick Airport. It would also enable a more flexible allocation in local plans to appropriate sites rather than linking much of the new floorspace directly with strategic locations.

2.10. We agree with Crawley BC that Policy NE7 could be stronger and more upbeat in terms of supporting RPG strategy which, as we conclude above, does place emphasis specifically on the general Crawley/Gatwick area. The policy and EM should be rewritten to clearly reflect and recognise this emphasis and the fact that Crawley/Gatwick is the economic driver in this part of the county, indeed region. We will leave the precise form of words to WSCC but the policy should certainly make reference to a strategic employment allocation (see paragraphs 9.3-9.9) and it should provide the context for the broader approach to housing allocations around Crawley that we refer to above. Opportunity should be taken in this redrafting to clarify the actual geographical extent of the WPA for it is not our understanding that the whole of the north east of the county forms part of it as implied in the first sentence of the policy as drafted. We are happy that the policy should remain in the needs section of the plan; we see no particular value in transferring it to the location section as suggested by Crawley BC. We consider that the changes that we recommend to Policy LOC1 under Issue 3 will give the necessary emphasis in that section to development which supports growth around Crawley/Gatwick, and they will go some way in meeting Crawley BC's concerns in this regard.

Peripheral strategic locations

2.11. Given that the strategic location at Haywards Heath is a commitment we are talking here about Horsham, East Grinstead and Burgess Hill. As regards Burgess Hill, although this does fall within the area of influence of the WPA, we consider it more appropriate to consider this location in the context of coastal regeneration since so many participants link development here with the concept of drawing down economic prosperity to the coast. We would say, however, that in terms of a contribution to growth at Crawley/Gatwick, Burgess Hill is much less attractive than either Horsham or East Grinstead because of its lack of proximity, notwithstanding the road and rail links (which may, as we discuss elsewhere, be problematical in themselves). We are concerned here only with how the locations relate to the provisions of RPG9. Other characteristics, both positive and negative, are discussed in other sections of the report.

2.12. We do not accept the contention of Crawley BC and others that by going for development in a wider area RPG9's requirements are being diluted. As we have said we feel that a package of proposals as put forward by WSCC is not out of keeping with RPG and its reference to accessible locations locally and improved access to Gatwick Airport (paragraph 12.58). Nonetheless, given the policy emphasis on Crawley/Gatwick outlined above, we accept that Crawley and its immediate environs should be the first choice for locating new growth in the area. We will not comment on the question of phasing here; we deal with it under Issues 3 and 8.

2.13. The town of Horsham is actually located within the WPA. It has a direct rail link to Crawley and the airport with some prospect that services might be improved. There is agreement amongst most participants that it is an appropriate location for strategic scale development in the context of RPG9. There is no such agreement, though, in the case of East Grinstead. Horsham DC and Crawley BC believe that the location is being driven by local needs, principally the need for traffic relief in the town centre, and they and others doubt that it can make a strategic contribution, especially since transport links with Crawley/Gatwick are not good. On the other hand WSCC and Mid Sussex DC point to the proximity of East Grinstead to Crawley and Gatwick and to the prospects of a new, high quality public transport link unencumbered by current capacity constraints. They also place some importance on the value of regenerating the town through development and an associated relief road so that it can play more of a role in the economic life of the county. We are persuaded by these arguments for East Grinstead as a strategic location in the context of RPG9. East Grinstead is equally as close to Crawley/Gatwick as is Horsham, and much closer than Burgess Hill, and there is additionally the prospect of improved access to Gatwick Airport by both public transport and road. On the face of it East Grinstead is a good location for strategic scale development in our view, subject to the detailed consideration that we give it under Issue 6(iii). There is an argument that it will do nothing for coastal regeneration since links with the coast are so poor, but we accept Mid Sussex DC's point that RPG does not require all development to benefit the coast. The important consideration here is that it can contribute to economic growth at Crawley/Gatwick as well as bringing some local benefits that also have a wider value.

Coastal regeneration

2.14. In respect of RPG9 there are two matters for consideration here. The first is the relationship between the coastal area and economic growth in the Crawley/Gatwick area. RPG9 in paragraphs 12.58 and 12.22 requires joint working to explore the process by which Brighton and other coastal towns may benefit from this growth through a study to inform development plans and other strategies. The second is how the plan takes forward the Priority Area for Economic Regeneration (PAER) designation that includes Shoreham Harbour. In fact the first can be split into two, one dealing with the role of development in the Crawley/Brighton corridor, the other with linkages not associated with development and how they might be nurtured, only some being matters for the structure plan.

Development in the corridor

2.15. Having concluded that development should be at or close by Crawley/Gatwick to satisfy the requirements of RPG in respect of growth there, the role of development further south in the important corridor between Crawley and the coast needs to be examined in the context of its contribution to coastal regeneration. Burgess Hill is proposed in the DDSP as a new strategic location, though for only 500 dwellings in this plan period, but there are a number of participants, notably Horsham DC, Crawley BC and Sussex Enterprise (who unfortunately did not take up their invitation to take part in this debate) who strongly believe that a much larger development is justified there because it will draw prosperity down to the coast. The counter argument put forward by Mid Sussex DC, Boyer Planning and Berkeley Strategic Land is that it will draw economic development away from the coast. They see the corridor as one for movement and the transference of economic benefits rather than one for development, with transport improvements as a focus for aiding coastal regeneration. East Sussex CC also sees a risk of economic development at Burgess Hill having a detrimental impact on the coastal towns and it points out that those in its area tend to be weaker economically than those in West Sussex.

2.16. SEERA and GOSE point out that there is nothing in RPG9 which promotes growth in the corridor. They see it as regionally important in transport terms but not necessarily a major development corridor as well. That is not to say, of course, that there should be no development in the corridor or that in a particular case it might not be shown to assist in coastal regeneration. Since, however, there appears to be no matter of principle stemming from RPG, the contribution of development here to coastal regeneration must be considered on its merits. An argument put forward by supporters of major growth in the corridor is that it will fund the necessary transport improvements. Mid Sussex DC doubts this because of the likely scale and cost of those improvements. We too have reservations on this score which we deal with under Issue 10. Horsham DC and Crawley BC speak of perceptions being changed by development which would act as a kind of gateway to the coast but Berkeley Strategic Land feels that major development would become a magnet in its own right with a detrimental impact on the coastal economy.

2.17. We side with those who see major development in the corridor as having more of a negative impact on the coast. No hard evidence was offered at the EiP to support the notion that major development in the corridor would aid coastal regeneration. At

present it is conjecture. Perhaps some evidence will come out of the joint study referred to in paragraph 2.14, about which we say more below, but we cannot wait for this. WSCC seems somewhat half hearted on the matter. It only proposes 500 dwellings at Burgess Hill, and at the end of the plan period, admitting that the town needs time to consolidate after recent large-scale development. We also get the impression that this allocation relates more to local than to strategic needs. It acknowledges that no clear answers came from the 2001 Cambridge Econometrics study (see paragraph 2.18 below). It says it does not go as far as Horsham DC in recognising the potential within the corridor and points to the fact that there are a number of corridors, not just that based on the A23. From what we have heard and read we must conclude that major development cannot be justified here at present in terms of its contribution to coastal regeneration, though that does not necessarily rule out development if it can be justified in other terms. This we assess under Issue 6(iv).

Other linkages

2.18. There is general agreement that the improvement of transport linkages between Crawley/Gatwick and the coast is crucial, as indeed are improvements along the coastal corridor. WSCC talks of visionary improvements on the A23 road/rail corridor but does not elaborate on what these might be. We say more on this under Issue 10 in the context of the draft Regional Transport Strategy which stems directly from RPG9. The need for improved accessibility was a key finding of a study undertaken for WSCC in 2001 by Cambridge Econometrics to explore the economic inter-relationships between the Crawley/Gatwick area and the Sussex coastal towns. This study identified other economic strategies which might nurture and strengthen the linkages but these are tools which are largely outside the scope of the structure plan.

2.19. The report referred to above was a first step towards the more comprehensive joint study required by RPG9. Some participants, including the Federation of Sussex Amenity Societies (FSAS), express concern about the lack of progress on this and feel that as a consequence the DDSP has been prepared in a vacuum as far as the question of linkages is concerned. GOSE suggests that it would be the later part of 2003 before anything materialises from the study. WSCC accepts that it is difficult to be clear at this stage about how better linkages might be forged but argues that it should not delay preparation of the structure plan pending the outcome of the study. We agree on both counts, though it would have been our preference for the plan to state how it can assist the process of spreading economic benefits. It is unfortunate that little has been done to take this work forward but, as WSCC reminded us at the EiP, planning is a continuing process and cannot take on all emerging studies. To address concerns, and in view of the requirement contained in RPG, we recommend that Policy NE7 should at least make some reference specifically to economic benefits for the coastal area to assist regeneration as suggested by Adur DC. This would add weight to what is said in the EM at paragraph 161, which we would like to see expanded in any case so that the status, purpose and possible outcomes of the study are clearer. If any further ideas have come forward by the modifications stage, these could be referred to in the EM, or in Policy NE5, if more appropriate. If specific transport proposals emanate from the study they should be fed into the Local Transport Plan process.

Development on the coast

2.20. Adur DC and the CPRE feel that the emphasis should be on local action to promote coastal regeneration. Certainly there is some sense in taking the view that the problem is on the coast so deal with it on the coast as far as is possible. There is nothing in RPG9 that suggests that coastal regeneration is reliant on benefits cascading down from Crawley/Gatwick, though it clearly wants to see those benefits maximised so as to aid such regeneration. We would add, though, that this does not detract in any way from the urgent need to improve transport links. We consider this matter in greater detail under Issue 9(ii) since most of the coastal strip is outside the PAER with which RPG9 is specifically concerned.

2.21. As we indicate above, Shoreham Harbour does fall within the PAER, an area requiring a tailored regeneration strategy backed up by appropriate resources to address its problems and maximise its contribution to the sustainable development of the region (RPG9 paragraph 12.9). As the title suggests there is an implication that the area should be given high priority. GOSE feels that the emphasis on Shoreham Harbour claimed by WSCC, and joint working associated with it, is not reflected in policy. We agree. We note that references to the PAER are subsumed in the broader policy on coastal regeneration which gives little indication of what the specific strategy for this priority area is, or that it is in fact a priority. Having made that point we feel that the issues are best discussed under Issue 9(ii) which was also attended by the Shoreham Port Authority and others with an economic interest in the area. We make specific recommendations there concerning Shoreham Harbour.

RPG provisions and the rest of the county

2.22. WSCC points to the focus of RPG9 being on the implementation of the core strategy and policies on quality of life in town and country and the environment strategy and the countryside. It considers that the plan adequately reflects these. Rural interests, however, are worried that the plan is not giving sufficient emphasis to the needs of the rural areas and is ignoring how things are rapidly changing there in terms of both jobs and housing. In this respect we see Policy Q7 of RPG9 as a key consideration. It requires the quality and character of the rural environment to be maintained and enhanced while securing necessary change to meet the economic and social needs of local people and visitors. This is a key matter of balance and the rural lobby thinks the balance in the plan is inappropriate.

2.23. Drawing upon our deliberations under Issue 11, we agree with the rural representatives that in principle the plan needs some adjustment to properly reflect this RPG policy and overcome perceptions that the balance in the DDSP is in favour of environmental protection at the expense of local needs. As with matters relating to coastal regeneration we conclude that the details are best discussed under the issue heading where a range of expertise is available, in this case Issue 11. We used Issues 1 and 2 to give the rural representatives present an opportunity to flag up their concerns regarding compliance with RPG so that these could be considered more fully under Issue 11.

The question of balance

The relationship between the level of residential and employment development

2.24. In its statement WSCC says the plan aims for a broad balance between jobs and housing but it accepts that there is less control over the distribution of future employment than there is over the location of housing and that in reality it cannot achieve a precise balance. It concludes that the plan can aim only to maintain the broad balance between the two. We concede the point that only crude tools are available to influence economic development and that precise balance is an unrealistic goal, but we take the view that the plan should certainly seek to address current imbalances as far as possible. In this respect there are some basic requirements on which there is general agreement. These include the need to reduce long distance commuting, to achieve a mix of uses, to get better use of more sustainable modes of transport, to sustain rural communities and for business to have the opportunity to locate where it wants to be and to have a good supply of affordable labour on hand. Subject to our recommendations in other sections of the report we consider that these requirements can be met. However, we need to address the concern on the part of some, notably FSAS and Sussex Enterprise that the plan is housing allocation led and that therefore jobs are not necessarily going to where they need to be, and that this is especially so in respect of the Crawley/Gatwick area. A related view is that concentration in strategic locations is overlooking housing and employment needs elsewhere, particularly in rural areas where there is a need for sustainable and balanced communities.

2.25. We do not accept that the plan is housing allocation led. We take Arun DC's points that along the coast it is led by the need for economic regeneration and that in any event many opportunities will arise through current commitments. WSCC stresses that employment allocations in the strategic locations represent only a small part of the total employment provision and that there will be much scope for employment development across the county. We agree that provided allocations are sufficiently flexible, as WSCC maintains, and relate well to housing, this will be the case, and we say more on this under Issue 9. Nevertheless we do not underestimate the value of the allocations at strategic locations in generating local employment. With regard to Crawley, our recommendations above concerning how both employment and housing allocations are represented in respect of the wider area will give a clearer indication of how economic needs are to be met in relation to new housing provision. Together with the emphasis to be placed on high-tech industry, we are satisfied that this strategy will avoid overheating in the local economy in the future, a matter raised by Berkeley Strategic Land. On the rural issue the basic point is made in objections to various policies in the plan and we address it under Issue 11. Notwithstanding views expressed there we agree with the plan's basic philosophy, as supported by CPRE, that new development should follow the existing concentrated settlement pattern so as to maximise access to jobs, services and transport.

2.26. There is some concern about the north-south balance, notably on the part of Berkeley Strategic Land and FSAS. We note that the latest employment forecasts from Cambridge Econometrics dated 21st June 2002 (document WS0047/AD) show a much closer similarity between projected growth on the coast and in the north east of the county and that this closely conforms to the plan's proposals for residential growth. We accept that it would be unwise to build too much into these figures but they do seem to indicate that there is not a major imbalance and we agree with WSCC that major change is not required in respect of the balance of allocations between the two sub areas.

The broad distribution of the overall dwellings requirement between districts

2.27. From our conclusions above we see no need for any significant change in the distribution of the dwellings requirement between districts. Neither do our conclusions under Issues 5, 6 and 7 suggest anything other than local adjustments. We accept Horsham DC's point that the district boundaries are somewhat artificial in relation to the plan's vision and to sub regional objectives but the overall philosophy appears to be appropriately reflected in the broad allocations. The adjustments that we seek in relation to the Crawley/Gatwick area are well documented above. We have something to say about the extent and role of small scale greenfield development, particularly in respect of rural needs, in the next section of our report, but again this does not affect the overall allocations.

The broad distribution of employment floorspace between districts

2.28. Similarly we have little to add under this heading. We consider the DDSP has got the balance about right subject to local adjustments that we recommend, notably around Crawley. There may be a need for some other adjustments stemming from our recommendations on the strategic locations. We deal in some detail with employment allocations and the various concerns that have been raised about them under Issue 9.

The Panel's overall conclusions

2.29. As regards the regional context we consider that greater emphasis does need to be placed on the Crawley/Gatwick area. That does not mean increasing housing or employment allocations overall but recognising how they relate to the wider area and its needs. Adjustments need to be made both to Policies NE1 and NE7 to reflect this emphasis and, subject to their acceptability in other terms, priority should be given to locations for strategic development at or close by Crawley and immediately adjacent to the nearby towns of Horsham and East Grinstead.

2.30. We see no broad strategic case for major development in the A23 corridor over and above what is committed. We doubt that it would benefit either the Crawley/Gatwick area or the coast. Nonetheless we do place great importance on the improvement of transport links on this corridor, and indeed on other corridors to the coast as well as the coastal corridor, as a major means of forging better economic linkages between the buoyant Crawley/Gatwick area and the coastal towns. Policy needs to reflect the

value and potential of these linkages but cannot be developed to a significant extent in the absence of any outcome from the joint working required by RPG9. As regards the PAER we believe the plan does need to afford it greater emphasis and we make appropriate recommendations under Issue 9(ii).

2.31. We draw no firm conclusions at this stage about how the plan reflects RPG provisions for the rest of the county. These matters are subsumed in our consideration of rural areas generally under Issue 11.

2.32. On the question of the balance and distribution of people, homes and jobs, we consider that the balance in the plan is about right, based as it is on maintaining the present broad balance across the county. However, this view is subject to there being some minor adjustments, including those in the Crawley/Gatwick area referred to above, and to the delivery of strategies which will relate jobs more satisfactorily to the distribution of new housing, notably transport strategies and strategies which provide for mixed use developments.

Recommendations

2.33. We make only two recommendations here as set out below. Other conclusions that we draw are reflected in recommendations under other issues.

Recommendation 1.1
Policy NE7 should be redrafted so as to give specific emphasis to the Crawley/ Gatwick area as a focus for growth in the context of RPG9, making reference to a strategic employment allocation and providing a context for an area based approach to housing allocations. The policy, to properly reflect RPG9, should also make reference to development in the north east of the county where possible maximising economic benefits specifically to the coastal region in order to assist regeneration there. In the absence of any clear guidance on how the plan can assist this process, the EM to the policy should say more about the timing and aims of the joint study required by RPG9 paragraph 12.22(b).

Recommendation 1.2
Policy NE1 should include a note explaining that much of the allocation of dwellings to Horsham and Mid Sussex districts that is attributable to strategic locations relates to the needs of the Crawley/Gatwick area. This should be cross referenced to Policy NE7.

CHAPTER 3

ISSUE 3 THE LOCATIONAL STRATEGY

Is the locational strategy the most appropriate for delivering the required quantum of development?

Background

3.1. Under this issue we are looking in general terms at how the plan's development strategy is expressed spatially, primarily through Policy LOC1. We need to consider what changes might be needed to this policy and related text in the light of objections made to the DDSP and matters raised at the EiP. We are not considering here the more specific pros and cons of the various locations for strategic scale development; that comes under Issues 6 and 7.

The main issues

3.2. The main issues for consideration are these:

(a) Is the rationale for the selection of the strategic locations sufficiently clear? Should the strategic commitments be included on the list?

(b) Should the identification of strategic locations be more or less precise?

(c) Is there a case for more emphasis and greater priority being placed on small scale greenfield settlement extensions, particularly extensions to urban areas? Would small urban extensions be any less sustainable than the proposed strategic locations?

(d) Should contingency be built into the strategy to allow for the North East Sector (Crawley) not coming forward and for a possible shortfall on previously developed land (PDL)? How should the plan address a possible need to increase house building rates post-2006 following an RPG review? Should reserve locations be identified?

The strategic locations

The strategic commitments

3.3. What we describe as the strategic commitments are the five locations identified for strategic development which are already in adopted or deposit draft local plans. They are east of Angmering, the North East Sector of Crawley, west and south west of Haywards Heath, Worthing (Durrington) and north of Bognor Regis (Bersted/Felpham). Opinion is divided on whether these locations should be included in Policy LOC1. WSCC's view is that they are an integral part of the strategy for the plan period and their inclusion is necessary to give the complete picture. The counter view is since they are not new proposals their inclusion is confusing. However, not everyone expressed a view and David Pantling, for example, does not think the matter particularly important. In the circumstances, and given the time constraints and much more contentious matters under this issue, we decided that little would be achieved through a debate. On balance we share WSCC's

view and are happy that these locations are kept in provided that it is made clear that they are indeed commitments and not new proposals.

The rationale for the selection of the strategic locations

3.4. The background and rationale for the strategy is set out in WSCC's background paper on delivering the development strategy as revised in September 2002 (document ref: WSCC/6/1234/B). We see no point in attempting to summarise this but would reiterate that the basis of the strategy, after making the best use of opportunities to reuse PDL in urban areas, is to provide for the remaining local needs of villages and small towns by small scale gradual growth, and to provide for strategic needs through major extensions to the main towns where possible. In the coastal areas WSCC maintains that it is not possible to accommodate all the growth required in this way and therefore it had to look at the potential for extending other settlements in transport corridors. The strategy also includes provision for small-scale extensions to the main towns in the transport corridors if these are needed to meet identified local needs. Most participants are of the opinion that the rationale is clear, though some do not agree with it. David Pantling considers that there is little rationale for the selection of the strategic locations, whilst Crawley BC says it is not entirely evident how the locational strategy flows from the plan's vision. Both want to see major changes to Policy LOC1 and we deal with these in our overall conclusions where we put forward our view on the preferred shape of the policy.

3.5. It is not the rationale but the interpretation of criteria in the selection of certain locations that many find flawed and they point to inconsistencies, particularly with regard to locational guidance set out in PPG3, the treatment of strategic gaps and the emphasis apparently given to addressing local rather than strategic needs. We do not propose to say anything further here about local needs determining strategic locations. The point has been made by Horsham DC and Crawley BC and we comment on it under Issue 1. We heard no new evidence under Issue 3 to change our conclusion.

3.6. Taking the matter of consistency with PPG3, which was raised by Boyer Planning and Berkeley Strategic Land, the concern is particularly about proposals at Tangmere (contained in the 'Proposed Changes') and in the west of Arun district. We too find it strange that the village of Tangmere is being promoted as a location for strategic development, especially given WSCC's strongly expressed views about the expansion of villages (see paragraph 30.15 below). It is not an urban extension, neither a nodal point on a good public transport corridor. We agree that it is inconsistent with both PPG3's sequential approach and with the general philosophy of the plan. Indeed WSCC has objected to like proposals to expand similar small settlements. There would have to be very good reasons for citing Tangmere as a preferred location and we consider the matter under Issue 7. We are sceptical about WSCC's claim that due to severe constraints there are simply no alternative opportunities for urban extensions in Chichester district. We are less concerned about the location in the west of Arun district which could accord with PPG3's approach by virtue of its potential location on the south coast rail line, and we take Arun DC's point that further mixed use extensions to its main towns would result in urban sprawl and not necessarily be as sustainable.

3.7. The question of strategic gaps is related to these considerations, some taking the view that they are mistakenly being overlooked as locations for sustainable urban extensions. WSCC accepts the primacy of strategic gaps but points out that boundaries are not precise and that some strategic locations are within gaps. Its main point is that the coastal gaps are very small and erosion would remove their features. We agree on this point and we say more at paras 11.12-11.19 but we are not convinced that the argument applies to all gaps around and to the west of Chichester. Our suggested changes to Policy CH6 should make it easier to achieve consistency in respect of what are currently described as strategic gaps by placing the emphasis on maintaining the identity and character of settlements.

3.8. The perceptions referred to above, and specific criticisms of the rationale, point to the need for greater transparency in the way that the strategic locations have been identified and how they relate to locational criteria. WSCC points out that the background paper performs this function but it appears to be open to ideas on how transparency could be improved in the plan itself. We propose that a table be included in the appendix to the plan showing, for the strategic locations that we recommend, relative assessments against criteria. To be of real value this should be text-based and not a simple matrix of ticks and crosses.

Precision in the identification of strategic locations

3.9. PPG12 in paragraph 3.8 requires structure plans to indicate the general locations of individual major and strategic developments likely to have a significant effect on the plan area. There are differing view among participants as to whether the DDSP accords with this. Those who argue for less precision than in the DDSP, including GOSE, David Pantling, Horsham DC and Crawley BC say that it is better to leave the details to the local plan stage so that a range of opportunities can be evaluated and alternatives are not overlooked. The counter argument, largely in support of WSCC's position and put forward by CPRE, Chichester DC and Mid Sussex DC, is that certainty is needed to avoid delay and give clear guidance to developers and service providers. Some see broad areas of search as a compromise.

3.10. Our view is that each location needs to be considered on its merits; there is no advantage in consistency on this particular matter because circumstances in each location are different. The plan should be as specific as is necessary for strategic purposes without intruding on the realms of matters more appropriate to a local plan. Locational issues will in any event be examined at the local plan stage and we agree with those who say it is better to have a proper assessment at that stage to ensure development goes to the most sustainable location within a broad area. We would not wish to see the district councils tied down to the extent that this is not possible. The descriptions of our recommended locations generally reflect this view but are influenced by our strong views about certain locations and by the need for service providers to be able to start their planning process. We accept that there are cross boundary issues that complicate matters at Crawley and we address these under Issue 6(i). Overall we consider our approach to be consistent with PPG12.

The Strategic Development Principles

3.11. Certain requirements relating to the various strategic locations set out in the EM to Policy LOC1 are proposed by WSCC's Proposed Change PC/60 to be moved into an appendix under the heading 'Strategic Locations - Strategic Development Principles'. Some participants, including Horsham DC and David Pantling, are concerned about the prescriptive nature of these statements which, it is argued, tend to predetermine the direction of growth, though WSCC refutes this. We see the need to establish principles to guide development at the strategic locations but this must take the form of a list of requirements legitimately based on needs which stem from the development in the general location identified, together with factors which should be taken into account. Where the designation of a location is made less precise as a result of our recommendations, then the principles will need to be more general. In all cases they should be used to identify the best and most sustainable sites in a broad location. We do not intend to specify precisely what should be in the lists but we test their legitimacy and propose certain changes under Issues 6 and 7. However, we do recommend that there should be cross reference to the appropriate policies of the plan which provide the context and explain the justification for particular requirements. In this way it would be clear that the requirements originate in other policies of the plan rather than are policies in themselves.

3.12. We would add that we have misgivings about the wording of the second and fourth bullet points of the general principles. We wonder who is going to determine whether the impact of development on character and environmental assets is acceptable and against what criteria. Local residents may never agree that it is acceptable and so there is some difficulty here. We propose that the emphasis should be on minimising the impact in the context of the structure plan's policies on character and the environment and we also stress the need for close working with local groups and organisations on these matters to maximise the possibilities of local agreement.

Small-scale greenfield development

3.13. We start here by acknowledging that since WSCC's threshold for strategic scale development is 500 dwellings, a figure that it says is appropriate having regard to the size of the county's settlements, in theory we could be talking about developments up to 500 dwellings in this category. This is by no means small, though WSCC points out that there are few if any opportunities on this scale because of local constraints. There are two issues to consider. The first is whether small-scale greenfield developments should be a more prominent part of the strategy as many maintain. The second is whether they should be considered as a contingency, again a popular contention. We will deal with the second in the next section under the contingency heading and concentrate here on the first.

3.14 WSCC points out that the small-scale greenfield element of the strategy comprises 16% of the total greenfield provision, or 1750 dwellings. It says the precise quantity would be for local decision based upon an assessment of need and it acknowledges that there is no particular basis for the figure. The figure relates to development under part (c) of Policy LOC1 concerned with the small-scale, gradual growth of villages

and small towns, but also, though this is not clear from the plan, to part (b)(4) which refers to extensions to the main towns in the passenger transport corridors.

3.15. WSCC feels strongly that small-scale settlement extensions should be only a minor element of the strategy and is supported in this view by the district councils and Berkeley Strategic Land. Its reasoning is that large scale, concentrated development is more sustainable mainly because of the spin-offs possible, notably in terms of affordable housing and major infrastructure provision, and it also refers to the anti dispersal stance of RPG 9 (paragraph 3.5). It maintains that any greater emphasis on smaller developments would dilute its strategy of concentration and reduce these benefits. By contrast many participants believe that small-scale development can be just as sustainable as large scale and point to the fact that PPG3 does not differentiate by size when referring to urban extensions. David Pantling gives a long list of advantages of small scale development over both strategic development and PDL, including ease of delivery, and South East Water says in its submission under Issue 10(ii) that such sites are more sustainable in terms of meeting increased demands on water resources. On this basis there is a call for a more balanced portfolio of development locations featuring more small-scale development, not least from the rural lobby which is concerned about the impact on villages of a strategy based on concentration. HBF argues that such an approach will also offer greater choice and variety in the housing market in accordance with PPG3.

3.16. We accept that small-scale development can be sustainable and can offer other advantages, but we consider that the balance of advantage lies with the DDSP's preferred approach. We place much weight on the need to deliver significant volumes of affordable housing in accessible locations and on concentrating homes where they can best relate to a range of jobs and services through high quality public transport links. Having considered the potential for small-scale greenfield developments under Issue 5 and noted the views of the districts we are satisfied that, subject to a minor upward adjustment to reflect certain local needs, the plan's provisions for them are adequate. We have also had regard to the fact that there will be PDL opportunities in the smaller settlements to supplement new provision and that the district councils will have discretion to allocate greater numbers if local circumstances dictate. This flexibility is key in our view, especially given our conclusions in Issue 11 about rural needs and local involvement in identifying them. We would add that we are satisfied that there is sufficient guidance in Policies LOC 2 and DEV1, 4 and 6 of the plan on locational criteria for this category of development, subject to changes that we recommend under Issue 10(i) and 11.

3.17. There remains a need to deal with the apparent anomaly presented by the separation of the two types of small-scale greenfield development referred to in Policy LOC1 (see paragraph 3.14). Participants find the policy muddled and somewhat confusing on this score. From what WSCC has said and from paragraphs 26 and 86 of the DDSP the provision made in LOC1 (b)(4) appears to be for identified local needs, but so is the provision under LOC1(c). WSCC accepts that the text is not clear. We can see no good reason for keeping these two elements separate, especially since they share a common allocation, and our recommendations for Policy LOC1 reflect this.

Contingency

The North East Sector of Crawley

3.18. The position on this committed location prior to the EiP was that development could get underway as soon as an Article 14 Direction preventing it because of possible airport expansion was lifted. There was every hope of this happening since the government had decided not to include Gatwick in its consultation about the future development of air transport, (document No G00351A), given the existence of a legal agreement between BAA and WSCC that there will be no second runway there before 2019. Even so some participants saw the need for contingency because of remaining uncertainties. However, the government's decision not to include Gatwick had been challenged in the High Court and on the first day of the EiP the High Court issued its judgement that Gatwick should indeed be included. The Secretary of State subsequently decided not to appeal and announced that further consultations would be arranged (document 7626/6/1A).

3.19. This presented a new situation with regard to the North East Sector of Crawley which was in fact debated as part of Issue 5(ii) so that parties had time to consider it. Barton Willmore, who are promoting development at NE Crawley, made a very helpful statement at the EiP setting out the position as they see it. In short their view is that there are three possible options that might be pursued which would allow development to go ahead: no runway, a northern runway and a close parallel runway to the south. With the last of these, the consultation document, which does include options for Gatwick for information, indicates that there would only be a marginal shift in the 57 dBA noise contour. There is a fourth option for a new wide spaced runway to the south which would undoubtedly prevent any major development, but since this has serious ramifications for a wide area and would necessitate a full scale review of Regional Planning Guidance and local planning strategies, Barton Willmore consider that it is an 'outside option'. They conclude that the development proposal for NE Crawley should remain in the structure plan.

3.20. With some provisos, for example about the number of possible options, there is general agreement with this scenario amongst participants and we too go along with it and take the view that the North East Sector of Crawley should be retained in the plan as a strategic location without contingency. Doubts are expressed by Berkeley Strategic Land who says a new runway after 2019 cannot be ruled out and should not be prejudiced by development. We would argue that this matter is unlikely to be left in doubt and we hope that the situation regarding Gatwick's long term expansion will soon become clearer than it was prior to the High Court's judgement. DPDS questions the marketability of housing so close to an expanded and busier airport but we note that noise is unlikely to be an issue and we consider that the North East Sector location will offer many advantages in terms of accessibility to jobs and transport.

3.21. We think that the wide spaced runway is unlikely to be pursued given its environmental impact and the existence of other options elsewhere offering the same capacity with arguably much less impact, but it is probably the best option operationally and cannot be ruled out completely. However, there seems little point

in planning for it because, as we say, the whole basis for such planning would change. In any event we would strongly urge the government to reject it because it not only removes the North East Sector which is arguably the best location for strategic development in the Crawley/Gatwick/M23 sub regional area identified in RPG9, but it would jeopardise other very sustainable developments that are required to support growth in the area in the context of RPG. We would also add that the unrestrained provision for increased numbers of flights in the South East is not a certainty as it seems to be an example of the discredited 'predict and provide' approach not applied to other forms of development, and in any event it may well be at odds with the increased emphasis on sustainability.

3.22. We do accept another point made by DPDS that there would be delays in any event. At least a two year delay seems inevitable due to the consultation process and publication of the White Paper. However, Crawley BC and WSCC agree that only 250 houses were envisaged here before 2006 and that they could easily be made up from other local sources in Crawley, both PDL and small greenfield. There is also the issue of whether some of the site would be lost or could not be built upon if the close parallel runway option were adopted, but we accept Barton Willmore's argument that there is flexibility to adjust the site boundary elsewhere and/or that densities could be increased so that 2,700 dwellings can be delivered in the plan period. Evidence of build rates at the Maidenbower neighbourhood also reinforces our view about delivery.

The need for contingency on other accounts

3.23. A number of participants anticipate that the review of RPG in 2006 will give rise to the need for increased housing numbers and thus build rates, and they say the plan should make provision for this. There is also a widely held view that there will be a shortfall in the numbers of dwellings delivered on PDL because WSCC is over-estimating the potential. We deal with the PDL concerns under Issue 4. Regarding the post 2006 situation there may or may not be a need for increased provision and if there is it may be directed to some other location in the south east for strategic purposes. It is speculation at present. Nevertheless we must acknowledge that there could be difficulties on the horizon on both counts. That said, we note that the majority of participants agree with WSCC that reliance should be placed on the plan, monitor and manage (PMM) approach to make tactical adjustments prior to review of the plan's provisions (in whatever form such a review might take under the new planning regime). We support this approach and see no need for specific contingency provision on these two matters. We do not agree with Barton Willmore that additional locations should be identified at this stage for development if needed; this is a matter for the review. Neither would we go as far as GOSE in suggesting that the plan should be explicit about the options for long term housing growth favoured by WSCC. However, we do refer under Issues 6 and 7 to further studies of the longer term growth potential, particularly at Horsham and around Crawley, and these may identify where capacity exists which could be brought forward if needed. We would add that there may be value in continuing discussions and co-operation between all the local planning authorities involved in the context of changing RPG.

3.24. Agreement ends when it comes to how PMM should operate. WSCC relies heavily on bringing forward for an earlier start development at the strategic locations so as to accommodate any shortfall. It says that much planning will have gone into the strategic locations and it has every confidence that lead in times are such they will deliver as envisaged and be able to offer opportunities for earlier development if necessary. Others think this misguided and impractical and seek greater flexibility if there is to be effective management having planned and monitored. There is a view that there are some inherent difficulties with the large strategic developments such as delays at the local plan stage or in the provision of infrastructure, and there could be other unforeseen problems when dealing with such complex schemes. The result could even be that the strategic locations themselves become a source of shortfall rather than a saviour. HBF argues that a strategy that relies so heavily on large strategic developments, and is thus without balance, is vulnerable.

3.25. Our bottom line on this matter must be the First Secretary of State's statement on 18th July 2002 making it quite clear that the housing numbers in RPG9 have to be delivered. If there is any doubt at all about delivery then the plan must address it. In this respect we take heed of the concerns of HBF and others about the strategy's vulnerability. We agree that there is reliance on the strategic locations to get the plan out of trouble if delivery falters or additional housing is required. WSCC may be right about the ability of the locations to deliver but we acknowledge that there is a range of things that could go wrong and we cannot take the chance that they will not. We strongly believe that the plan must identify robust and realistic mechanisms for dealing with any shortfalls in the context of PMM, whatever way they may occur. The fact that we do not at present know when and how the plan's provisions will be reviewed gives added impetus to the need to get the PMM approach and its mechanisms right.

Building in contingency

3.26. HBF makes the case for some kind of contingent provision based on additional small greenfield releases. However, the district councils are opposed to the concept of reserve sites because they divert attention away from PDL and tend to become commitments. We agree that the identification of reserve sites should, if possible, be avoided for these reasons. They will dilute the strategy and there is in any event a problem in knowing how much land might be required and where. That is not to say that no additional greenfield releases would be appropriate. PDL and the strategic locations must remain the priorities for accommodating development but small greenfield sites in sustainable locations represent in our view the most realistic fall back. We believe that the district councils should be given the flexibility to decide how best to react if the monitoring process indicates a shortfall and we see the solution in our proposed wording of Policy NE3 (see Recommendation 8.2).

3.27. In the context of the PMM approach and our proposals to make it realistic and workable we share the concerns of those who question the value of phasing the strategic locations beyond the first period. We accept that WSCC sets great store by the concept as a way of controlling the release of major development over the plan period and it is supported by the district councils; Horsham DC says no phasing, no steer. But Berkeley Strategic Land maintains that the phasing approach of Policy

LOC1 prohibits the proper application of PMM. They argue that with phasing there is no incentive to work on later developments until it is necessary to do so and that given long lead in times as evidenced at Bognor Regis this will mean sites will not be available if they are needed earlier. David Pantling too favours merging the two later phases to ensure that sufficient land is available when required.

3.28. We have some sympathy with these views having said that ensuring delivery is what is important. Post 2006 there is lack of certainty about the actual constraints on timing. Our deliberations on the west of Crawley and East Grinstead locations demonstrate this. We also have to acknowledge that at least 7 years work might be needed on all post 2006 strategic locations to bring them near implementation stage. Moreover we question whether phasing as incorporated into Policy LOC1 is in fact workable, for we accept that development can be affected by unpredicted events with the result that its programming is thrown off course. This can only serve to negate the claimed benefits of phasing. Our conclusion is that there is too much risk and uncertainty associated with phasing as proposed. In our view there is a strong case for detailed and early consideration to be given by local planning authorities and developers to how each of the strategic locations could be developed. They should be reassessed before 2006 in the context of the local plan as to when and how they should be released in the light of any constraints on delivery identified, market conditions obtaining at the time, progress with PDL and commitments and the provisions of Policies NE1 and 3. The reassessment would be part of the PMM process undertaken jointly by WSCC and the district councils. With the exception of development at the committed locations being commenced prior to 2006, we recommend that phasing should be deleted from Policy LOC1 and dictated by the provisions of Policies NE1 and 3. This in our view would help to ensure the required quantum of development is delivered in the plan period.

3.29. We have concluded that there is no need for any specific contingency in the plan and that things can be left to the PMM approach that a modified Policy NE3 addresses. There is one exception to this that we should flag up here and that relates to development west and south west of East Grinstead. We take the view that the plan needs to state in that case how any shortfall would be met and our reasoning, together with the contingency that we propose, is set out under Issue 6(iii).

The Panel's overall conclusions

3.30. We have identified a number of changes that need to be reflected in Policy LOC1 and our recommended wording of that policy is set out below. In constructing this we have taken into consideration the wording suggested by David Pantling and the representations from other participants about those suggestions and we are grateful for these contributions. Crawley BC also proposed significant changes and some of these ideas have been taken on board, but we see no advantage in including a separate section specifying areas of development constraint as Crawley BC proposes; this is adequately covered in other policies in our view. As regards the locations themselves we have brought forward our conclusions and recommendations from Issues 6 and 7 so that the policy wording is set out in full.

3.31. These are our prime considerations in formulating the revised policy having regard to what we have read and heard under Issues 1, 2 and 3 and our views on how best matters should be presented.

- The policy must be kept as simple as possible.
- The policy should provide clear and unambiguous guidance.
- There should be a distinction between the north east and the coastal areas of the county so as to reflect RPG provisions relating to the Crawley/Gatwick area.
- There should be a distinction between commitments and new proposals and reference to the optimisation of the development potential in the committed locations.
- No greater prominence needs to be given to small-scale greenfield development.
- The anomaly and confusion created by separating the two types of small-scale greenfield development should be removed.
- Phasing should be removed apart from an aim that development in the committed locations should commence before 2006.
- There should be no second tier locations but an implied firm commitment to all.
- Reference to an order of priority should be removed. Relative priorities will be determined by the districts in the context of PPG3 and revised Policies NE1 and 3.
- There should be no duplication of other policies.
- There should be no reference in the policy itself to numbers of dwellings at any of the locations.
- There should be cross reference to Policies NE1 and 3 relating to monitoring, release and contingency.

3.32. To support the provisions of Policy LOC1 in respect of the locations specified there should be greater transparency in the plan about how they have been derived and how they relate to and satisfy various criteria. This should be set out in an appendix so that it is not necessary to refer to a background paper that might not be readily available. Additionally, the Strategic Development Principles, which should be in an appendix or in the EM to Policy LOC1, will need some adjustment in the light of our recommendations, and some specific changes to the wording of the General Principles section.

Recommendations

3.33. We make the following recommendations:

Recommendation 3.1
Policy LOC1 should be rewritten as follows:
(a) Unchanged from DDSP

(b) 'Development requirements which cannot be met within towns and villages or at sites with existing planning permission (subject to review at

renewal) should be provided for mainly in the form of large scale, mixed use development at the following strategic locations:

(1) these committed locations (*) where development should start before 2006:
- **(i) Crawley (North East Sector) (+)**
- **(ii) south east and south west of Haywards Heath;**
- **(iii) east of Angmering;**
- **(iv) Worthing (Durrington);**
- **(v) north of Bognor Regis (Bersted/Felpham);**

(2) these locations in the north east of West Sussex associated primarily with growth in the Crawley/Gatwick/M23 sub regional area identified in RPG9:
- **(i) west of Crawley;**
- **(ii) west and south west of East Grinstead;**
- **(iii) west and/or south west of Horsham;**

(3) these locations in the coastal area of West Sussex associated primarily with regeneration of that area:
- **(i) at Chichester City;**
- **(ii) in Arun District west of Barnham.**

(c) In addition to the locations identified under (b) limited provision should be made in local plans or their successors for the small scale gradual growth of villages and small towns spread over the plan period which will assist the evolution of rural communities by meeting identified needs for housing and economic activity and supporting local facilities and services, and for small-scale extensions to the main towns in the passenger transport corridors to meet identified local needs not otherwise met by strategic scale development.

(d) Unchanged from DDSP.

(*) These locations are already identified in adopted or deposit draft local plans. Their development potential should be optimised to an extent compatible with the local character, environment, resources and assets of each location.

(+) Development at this location may be delayed as a result of consultations on the possible future expansion of Gatwick Airport.

The EM to Policy LOC1 should cross reference to Policies NE1 and 3 in relation to monitoring, release and contingency, should list the main towns in the passenger transport corridors to avoid confusion and should more fully explain the role of small-scale extensions to those towns.

Recommendation 3.2
An appendix in tabular form should be included in the plan clearly setting out how the new strategic locations relate to key criteria for selection and

performance, including sustainability criteria and particularly those relating to transport.

Recommendation 3.3
The Strategic Development Principles for each strategic location should include a list of requirements based only on needs which stem from development in the broad location identified, cross referenced to those policies which provide a context and explain the justification for the requirements, together with principles which will guide development to the best sites. In the 'General Principles' section the word 'acceptable' should be replaced by 'minimised' in bullet points 2 and 4.

CHAPTER 4

ISSUE 4 URBAN CAPACITY

What is the realistic contribution of previously-developed land (PDL) to the overall housing requirement?

Background

4.1. Policy Q1 of RPG9, following the aims of PPG3, requires development plans to seek to achieve at least 60% of all new development in the rest of the South East on PDL and through conversions of existing buildings.

4.2. Policy NE1 of the DDSP sets out a target proportion of the gross number of new dwellings for each district which should make use of PDL.

The Main Issues

4.3. The main issues are:

(a) Is the Chesterton study sufficiently robust to provide the basis for the Plan's assumptions on PDL? How well does it relate to the government's Best Practice guidance?

(b) Should the overall PDL target be increased to 60% to accord with RPG?

(c) Will acceptable and appropriate policies be in place to enable PDL targets to be met?

The Chesterton Study

4.4. WSCC commissioned from Chesterton plc a report on urban capacity in West Sussex (Document No WS0027/CD), including an appraisal of an earlier study published in 1996. This report was published in April 2000, just after PPG3 but before the advice given in December 2000 in the practice guide `Tapping the Potential'. It makes use of one of the methods outlined in the latter - the `Typical Urban Area Study' (TUA).

4.5. The limited number of TUAs considered, the lack of discussion with other parties including the housebuilding industry, and other detailed matters are criticised by Boyer Planning and the House Builders Federation (HBF). There are indeed clear limitations to the study, but we note nonetheless that the general order of supply suggested by the study is supported by more detailed studies being carried out in, for instance, Crawley. It will undoubtedly be necessary to complete such studies for all of the districts on as common a basis as possible, but the essential issue for the present is the adequacy of the Chesterton study to inform the setting of strategic targets for both the county as a whole and for individual districts.

4.6. The merits of the study have already been considered by two Inspectors at local plan inquiries. Despite similar criticisms being made and in part accepted at the latter, both concluded that the study provided the best information currently available. This is our view too. Even if greater experience in the use of TUAs and other techniques for estimating housing capacity can be expected to improve the more detailed

reliability of future studies, that is no reason to doubt the general validity of the conclusions of the present study.

4.7. We note however that it did not cover the entire county, omitting smaller urban areas and larger sites. In addition, as WSCC makes clear, the results of the study have not simply been transferred uncritically into Policy NE1. Judgement has been necessary as to what allowances should be made and which part of the possible range for each district shown in Figure 5.5 should be adopted. For instance, as Charles Planning and David Pantling point out, in considering the potential of particular sites for housing the need for and competition from alternative uses must also be taken into account. Under these circumstances we regard the Chesterton study as being adequate to provide the basis for the targets set for the use of PDL for housing development.

The overall target for PDL

4.8. Policy NE1 expressly refers to the proportions of PDL as percentages of the gross numbers of new dwellings for which provision should be made for each district as being `targets'. This implies that some active effort will be needed if they are to be achieved. At the same time there would be no point in setting up unrealistic or arbitrary expectations which either could not be achieved or could only be achieved at the expense of other, possibly even more important, considerations.

4.9. The county-wide figure of 57% is the result of adding together the various figures for each of the districts which take into account their varying characteristics. Although it is close to the 60% set out as a target in RPG9, there would be no justification in increasing it merely to match this figure as that is intended to apply to the Rest of the South East as a whole. It would be unrealistic to expect that it would apply to all counties in that area, any more than to expect that all districts in West Sussex should have the same target. The target of 35% in Crawley for instance is the lowest of the West Sussex districts but because of the nature of existing development in that area will require considerable efforts to be achieved. Achieving 57% in West Sussex as a whole would be a valuable contribution to the overall target.

4.10. Over the last 10 years the overall figure achieved in West Sussex from PDL has been 52%. Thus the proposed figure of 57% would represent a challenging but achievable target, as would those for individual districts from which it derives. There is no reason to increase them arbitrarily merely to match a sub-regional target not intended to be applied directly to individual LPAs.

Policies to enable PDL targets to be met

4.11. The implementation of the advice contained in PPG3 (March 2000) required a reconsideration of many previous development plan policies on such matters as parking provision and the accommodation of development at higher densities than had previously been regarded as appropriate. It is clear that all of the district councils in West Sussex are endeavouring to ensure that their local plans are up to date and do take this and other current national and regional advice into account. It is likely to be several years before all have been reviewed or replaced but in the meantime the content of PPG3 is already a consideration to be taken into account. As such it may under some circumstances outweigh the policies in current local plans.

4.12. We accept therefore that all of the district councils are well aware of the contents of PPG3 in general and in particular of the need to make good use where possible of PDL for residential development. Boyer Planning and Independent Town Planning Services rightly draw attention to difficulties that can sometimes occur in persuading local residents, Council members or house buyers to follow the advice in PPG3, and Arun DC draws attention to similar difficulties with some developers. There is clearly a general need for further explanation of its aims and how they can be achieved, although this applies more widely than merely in West Sussex. The Federation of Sussex Amenity Societies (FSAS) points out that often argument is more over design than over density. However, we accept that on occasion even where design standards are high and local character is respected there may be other considerations which would make higher densities inappropriate in a particular location. Nonetheless we are satisfied that overall the policies of the structure plan as a whole and of adopted and emerging local plans would encourage the best and most efficient use of land so as to enable the PDL targets to be met.

4.13. Careful monitoring of development, which we discuss further under Issue 8, is an essential part of the approach summarised in PPG3 as 'plan, monitor and manage' (PMM). This should reveal which, if any, targets for PDL are being missed and, if so, why. If it were to show a conflict between development plan and national policies there would be scope at that stage to reconsider the aims of and weight to be attached to each with a view to finding ways in which the targets might be regained.

The Panel's Overall Conclusions

4.14. PPG3 and RPG9 both place considerable emphasis on the need to give priority to the re-use of PDL in preference to the development of greenfield sites. The targets set in Policy NE1 are challenging but achievable and give sufficient guidance and context for the preparation of local plans without unnecessarily constraining the difficult choices which are always involved. None of the views expressed by participants gives rise to any serious doubt as to the need to include these figures or their general appropriateness.

Recommendations

4.15 We make the following recommendation.

Recommendation 4.1

Make no modification to the targets for PDL contained in Policy NE1.

CHAPTER 5

ISSUE 5(i) STRATEGIC HOUSING REQUIREMENT - OVERALL

Does the plan make adequate provision for housing development?

Background

5.1. Policy H2 of RPG9 requires the plan to make provision to achieve a net annual average of 2890 additional dwellings. Policy NE1 of the DDSP sets out the provision that should be made in each district to achieve a total gross annual average rate of 3100 dwellings.

5.2. Issue 5(i) concerns a number of issues about the way in which all of the figures for the various districts have been derived. These relate to conformity with and relationship to regional and national guidance, how uncertainty should be dealt with and whether this plan should deal additionally with any shortfall from an earlier period. The figures for individual districts are considered under 5(ii)-(iv).

The Main Issues

5.3. The main issues are:

(a) Should figures be expressed as net rather than gross? Are the assumptions on which the difference is based robust? Is the relationship between the two sufficiently clear?

(b) Should there be a 10% flexibility allowance to take account of some allocations not coming forward?

(c) To what extent has there been an under-provision of housing in the period 1994-2001, and how should this be addressed?

Net or gross?

5.4. The figures set out in RPG are specifically stated to be net, that is, to have made a deduction from the total of new dwellings that will be created during a particular year to allow for the existing dwellings that would be lost due to demolition or conversion. In deciding at a county or district level on the number of new dwellings required it will therefore be necessary to make assumptions as to the anticipated rate at which the latter will occur. These will inevitably be likely to be based on past figures and trends, but however they are estimated some such assumption has to be made before a proper estimate can be made as to how much land needs to be allocated for residential development.

5.5. Under these circumstances, whether the main figures set out in Policy NE1 should be gross or net is clearly less a matter of principle than one of clarity and convenience. GOSE points out that other counties normally include net figures, following directly the lead set by RPG. This certainly makes the relationship between RPG and the SP more obvious, and the HBF, Richard Maile, and Berkeley Strategic Land all urge the use of net figures whereas Horsham and Mid Sussex DCs prefer the use of gross figures. The CPRE and others point to the danger of misleading the public as to the necessary scale of new building needed if net figures are used.

5.6. We can see considerable advantage in the use of gross figures. Land can only be allocated and completions monitored on this basis, and it is likely to be clearer and less misleading to the public. There is however undoubtedly a need to be consistent with other counties and to make it plain that the structure plan does conform with RPG. Policy NE1(a) already contains a footnote explaining that the figures given are based on a net annual figure for the county of 2890. This should be made more prominent but is sufficient to enable comparison with RPG. There should however be a fuller explanation in the EM of the derivation of the gross from the net figure and of the need for monitoring to show and compare both figures.

Flexibility Allowance

5.7. A structure plan sets out key strategic aims about the location and nature of future development. It is inherent that in so doing there will be inevitable and unpredictable changes in circumstance. We discuss aspects of this uncertainty under Issues 3 and 8. Some objectors to the DDSP wanted there to be an explicit allowance for this in order to ensure that the plan's overall objectives would be met, possibly by means of a flexibility allowance.

5.8. Policy NE1(a) requires provision to be made for a series of gross annual average rates of development of new dwellings for each district. It does not allocate specific sites, nor, other than setting out targets for the proportion that should be on PDL (see Issue 4), does it indicate how this provision should be made. Policy LOC1 sets out the locational strategy to which these numbers must be applied. The policies and allocations of local plans must be worded so as to ensure that the necessary provision will be made. Insofar as there are any uncertainties over any particular site, including the strategic locations, it will be for LPAs producing local plans to consider whether there is any case to add a flexibility allowance in respect of this uncertainty, and if so how large it should be. We consider that there is no case to include a flexibility allowance in respect of figures at a structure plan level, and note that GOSE knows of no structure plans which do so.

5.9. Even in the case of local plans, however, the approach of PMM advocated by PPG3 implies not only that careful monitoring of the actual rates, locations and types of development should take place, but that if PMM is found not to correspond with needs as identified in RPG, structure plans or local plans the LPA should manage the release of sites to correct this imbalance. There are a number of possible mechanisms for doing this, and their choice will be primarily a matter for the local plan. The process is still relatively new, and a number of difficulties over the identification of potential reserve sites are apparent, but it can be expected to be refined over the next few years. We consider that it is right for the structure plan to attach great weight to this approach which we discuss further under Issue 8.

Additional provision for an earlier shortfall

5.10. There is no doubt that actual provision of housing between 1994 and 2001 was below that anticipated in the then current structure plan, or the consequent increase in the need for new dwellings. There is however no general disagreement that the requirement set out in RPG9 is that which the new structure plan should incorporate, and that no additional provision should be made to make up the earlier shortfall. We share this view.

5.11. We share also however the view that it is vital to avoid circumstances that may lead to a repetition of this problem in respect of the provisions of the present plan. Once again, much will depend upon the success with which a 'plan, monitor and manage' approach is adopted, including the incorporation of suitable mechanisms to bring land forward quickly in the event of material underprovision and the avoidance of reliance on sites where there is material doubt as to their deliverability. We discuss the various strategic locations under Issues 6 and 7, and the release of land in more general terms under Issue 8.

The Panel's overall conclusions [5(i)]

5.12. Overall we are therefore satisfied that the figures set out in Policy NE1(a) would make adequate provision for residential development.

Recommendation

Recommendation 5.1

In Policy NE1(a) include the overall county net annual figure for new dwellings as a separate line in the main table rather than as a footnote. Extend the EM to explain the reasons for the conversion rate adopted and to emphasise the need to monitor both gross and net figures for new dwellings.

ISSUE 5(ii), (iii) and (iv)

STRATEGIC HOUSING REQUIREMENT - DISTRIBUTION

Are the figures distributing the strategic housing requirement to each district appropriate?

Background

5.13. The three sessions devoted to these Issues at the EiP dealt with 3, 2 and 2 districts respectively. As this was mainly for administrative convenience, the present report considers all of the districts in alphabetical order, followed by an overall summary and recommendations for the county as a whole. Our fundamental concern is with whether the figures given for each district are realistic. A number of participants question not only the figures but the assumptions which lie behind them. Although we do consider the listed main issues for each district, because of the need to discuss their individual circumstances and the amount of overlap that would otherwise be involved they are not repeated within the discussion of each district.

The Main Issues

5.14. The main issues for each district are:

(a) Will commitments and PDL yield the necessary provision in the early years of the plan?

(b) Are the annual average build rates realistic and achievable? How do they relate to likely demand?

(c) What might realistically be achievable through small-scale greenfield extensions to the main towns in passenger transport corridors and to village and small towns?

(d) Where applicable, do the committed strategic locations offer more potential than suggested in the plan?

Adur

5.15. Adur DC adopted its local plan in 1996. It is intended that a review will be put on deposit in October 2003. The DDSP target that 100% of residential development should be on PDL is clearly challenging, but the DC regards it as nonetheless being realistic. WSCC shares this view although Enplan and other participants express considerable doubt. Adur DC is currently undertaking a very detailed urban capacity study. Although incomplete we note that preliminary results suggest that the target is feasible. Recently such a rate has been achieved but in some earlier years it has been much lower. Sites, even once identified, can be slow to come forward for development.

5.16. The DDSP does not identify a strategic location in Adur. Indeed both the district and county councils consider that there is a lack of environmentally acceptable greenfield sites in the district due in particular to the narrow width and vulnerability of strategic gaps, especially at Shoreham Airport. We discuss strategic gaps in general under Issue 11 but make no judgement here or there as to how much scope there is for the acceptable release of land in this or other gaps as presently defined in Adur. This will be a matter to be considered in the emerging local plan.

5.17. We discuss regeneration at Shoreham Harbour under Issue 9(ii). What, if any, opportunities it offers for housing development in the longer term remain uncertain. Even if unused or underused land can be identified there is disagreement over the extent to which it is likely to be suitable for residential use in view of proximity of port and other uses which could either constrain residential use or be constrained by it. We wholly support mixed use development here, but accept that there is significant uncertainty as to what would be included and when it might occur.

5.18. This is a further part of a more general uncertainty which several participants express as to whether and how sufficient housing provision will be made in the district. We are aware of the particular difficulties which apply here but are nonetheless satisfied that the general confidence expressed by the district and county councils is not

misplaced. We believe that it is reasonable to assume that the figures included in the DDSP will be delivered. However, given the importance that we attach to ensuring that the plan will deliver the necessary overall total of new dwellings we regard it as being essential not only that careful and vigorous monitoring should take place but that if this were to indicate a material shortfall over part or the whole of the plan period, there should be a mechanism to rectify this. This is especially the case with Adur, where it would be hard to do this within the confines of the district itself. We discuss this point more generally under Issue 8 where we recommend modifications to Policy NE3.

Arun

5.19. Arun DC received the Inspector's report on its local plan in May 2002. This plan relates to the period to 2011. The Council hopes that further modifications may overcome objections to the modifications already put forward so that it will be able to adopt it in the spring of 2003.

5.20. We note the Inspector's acceptance of the generality of the housing policies of the plan, and his views on the main allocated sites. In view of this and of the detailed consideration of the potential for development on PDL and by way of small greenfield extensions required to come to these views we are satisfied that sufficient land is identified or is likely to come forward to provide for the early years of the structure plan period, and that this rate is realistic in terms of demand in the area.

5.21. The largest allocation is that to the north of Bognor Regis which was subject to many objections in the local plan. It was nonetheless accepted by the local plan Inspector who regarded it as offering the best prospect of improving local living conditions as well as accommodating new housing. There are a number of complicating factors in respect of its development, not least in connection with the various land ownerships involved. Clearly many local residents still oppose the proposal but we can nonetheless see no reason to doubt the confidence of Arun DC and other participants that development will occur during the plan period. We note that there is no expectation from GOSE that it will call the application in.

5.22. The DDSP refers to the site as providing some 1100 dwellings, whereas the local plan Inspector's report recommends that provision be made for 1350. We consider that this should be regarded in the EM as its likely capacity, although the actual provision will of course need to be monitored during the plan period. It is of the greatest importance to make the most efficient use of land in general, but especially in the strategic locations in order to maximise the gain that will result from the necessary release of greenfield land.

5.23. Land east of Angmering is still expected to accommodate about 600 dwellings. Permission has been granted for this number and we note that no material change is expected to it. Development at Bognor Marina may yield some new dwellings but, given the particular difficulties of the site, we consider that reliance should not be placed on this. We discuss the strategic location west of Arun District under Issue 7(ii).

5.24. Inevitably uncertainty is greatest over the latter part of the plan period. Nonetheless, despite this and the lack of an urban capacity study other than that for the whole

county carried out by Chestertons (see Issue 4), there is no reason at this stage to doubt that the district's potential to provide sufficient residential development, especially on PDL. This is of course a matter that will need to be continually monitored as part of the PMM process. The local plan will need to be reviewed during the plan period, taking into account the provisions of the eventual structure plan, the results of the monitoring process, and the local plan Inspector's comments on the many 'omission sites' that were subject to objection.

Chichester

5.25. The local plan has been subject to a First Review adopted in 1999, but a further Review awaits the completion of the structure plan process. We share Chichester DC's confidence that commitments arising from the current local plan together with unidentified sites will provide sufficient land for the early part of the structure plan period. The completion rate in the district has varied over the last 10 years, but even the higher annual rate of 575 anticipated in Table 2 of the DDSP is not much higher than the average from 1991 to 2001 of 539.

5.26. Despite the concerns of a few participants that sufficient sites may not come forward, we note that demand in Chichester is particularly buoyant. A high proportion of the dwellings coming forward in the last few years have been on PDL, although this is not necessarily a reliable guide to future provision. There are inevitable difficulties in identifying where future development may take place on PDL, especially in an historic town with the constraints on development that this is likely to entail. In addition Chichester DC has not yet carried out an UCS although we note the Council's expressed willingness to use its powers of compulsory purchase if necessary to ensure that land comes forward. This would be unlikely to be appropriate or realistic for sites which are part of an existing domestic curtilage, but might assist in ensuring that other potential housing development on PDL does take place. The figure given for development on PDL is nonetheless high and we recommend that it be reduced by 200 to give one that is more likely to be realistic.

5.27. We note the existence of former mineral extraction areas close to Chichester, some of which may have some potential for residential or mixed development although it may also be suitable for other uses, including the disposal of waste. Such choices will be a matter for the relevant local plans to determine.

5.28. Much of the anticipated new residential development in the district would be in the proposed strategic locations. We discuss them under Issues 7(i) and (ii) where we recommend modification to their location but not to the overall number of dwellings that they would produce. A number of participants point out the difficulty of securing the improved infrastructure or other necessary benefits needed around Chichester including affordable housing from small schemes on PDL. As we recommend that the structure plan should no longer specify on which side of Chichester the proposed strategic locations should lie, both their locations and the infrastructure that would be necessary for each to go ahead would instead be matters for the local plan.

5.29. All participants expressed strong concern for the preservation of the important and unique historic character of Chichester. This takes many forms, including the layout and varied building style in the central area, its general scale and setting, and views of the Cathedral from outside the city. Clearly its character has changed greatly since

Roman times, albeit that that change has been at a relatively slow pace compared with many other historic settlements. Nonetheless, as we explain under Issue 7, we are satisfied that substantial development of the scale envisaged in the two strategic locations that the DDSP proposes close to Chichester could take place without material harm to its character. Its form - whether one or two larger sites adjacent or close to Chichester, or a number of smaller ones - would be a matter for the local plan, but as it is by some way the largest town in the district, has good public transport connections and employment opportunities, development here would be likely to be more sustainable than if it were spread elsewhere in the district. Much of the remainder of the latter lies in AONB or is subject to flood risk and is therefore unsuited to development. As we note under Issue 7, the difficulty of road links to the Manhood Peninsula is likely substantially to reduce its suitability for development.

5.30. Table 1 of the DDSP suggests that 625 dwellings should be provided as small scale greenfield development in the district to cater for local needs. This is a relatively high figure compared with other districts. There are however a large number of settlements in the district, varying greatly in character and in the sensitivity of their surroundings to further development. Under these circumstances the figure of 625 does not seem excessive as a representation of their anticipated local needs and the potential to meet them.

Crawley

5.31. The local plan was adopted in 2000, before the issue of PPG3. Although it encourages the efficient use of land it does not specifically include minimum density policies or incorporate a sequential approach to residential development.

5.32. Crawley's character as a New Town is unique in West Sussex, and both the opportunities available and the preferred nature of new development will inevitably reflect that. Table 1 of the DDSP indicates commitments of some 3,465 dwellings in Crawley but no further small or large scale greenfield development beyond that. The main commitment - the north-east sector of Crawley - is discussed under Issue 3 where we conclude that it is the best strategic location for the Crawley area and one which would be capable of early development but for the current uncertainty over airport development in the south-east. However, as we say under Issue 3, the 250 dwellings expected to be completed by 2006 at this site could if necessary be made up by the use of PDL and small greenfield sites. In view of the particular nature of the district and the need to retain flexibility at a time of uncertainty we do not however recommend the addition of a specific allowance for the latter.

5.33. It is likely that a decision to construct or to preserve the option of constructing a close spaced second runway at Gatwick would reduce the land on which housing could be built here. If that were to be the decision, increased densities might nonetheless result in a potential increase in the number of dwellings that could be built on the remaining development area. On balance we consider that the likely yield of the site should continue to be taken as being of the order of 2700 dwellings.

5.34. The annual average build rate of 300 dwellings assumed for Crawley is not high and is consistent with recent rates. Although there are few options within the Borough for peripheral greenfield development and limited scope for development on PDL, we

regard this as being realistic assuming that the north east sector becomes available in the first half of the plan period.

Horsham

5.35. Horsham DC intends to review its local plan once the structure plan process is complete. In the meantime it has produced a short term position statement which indicates a substantial volume of development coming forward on PDL. No doubts were expressed as to sufficient provision being made during the early years of the plan. There are indeed already permissions for more dwellings than the DDSP expects during this period. There is a lively demand for housing in the area so that there is little chance of sites remaining undeveloped.

5.36. Apart from Horsham itself, the expansion of many towns and villages in the district is made difficult either by location in an AONB or by being poorly located in relation to public transport and employment. Our views on Southwater, for instance, are given under Issue 6(ii). We therefore do not consider there to be any material additional scope for small scale extensions to them beyond those required to meet local needs. The justification for the figure of 550 for the latter in Table 1 of the plan is not entirely clear, but none of the participants at the EiP were able to put forward anything which was more convincing and most felt that it was of the right order. We can therefore see no reason to vary it.

5.37. We discuss the strategic location west of Crawley under Issue 6(i) where we conclude that it should be retained.

Mid Sussex

5.38. Mid Sussex DC produced a deposit draft local plan in August 2001. The Inspector's report following the inquiry into objections is expected in June 2003, and it is hoped that the plan will be adopted in the spring of 2004. The plan period extends only as far as 2006 but in view of the number of permissions already granted and the number of allocations, which together with a large number of 'omission sites' will be subject to the Inspector's recommendations we can see no reason to doubt the adequacy of overall provision for the early years of the structure plan period. The assumed amount of development on PDL is based on the Chesterton study which accords generally with Mid Sussex DC's own urban capacity study. We note the increasing rate in the development on PDL in the district.

5.39. The annual building rate in Mid Sussex has been volatile in recent years, but the annual average figure of 680 shown in Table 1 of the DDSP lies well within the range and we can see no reason to regard it as being unrealistic.

5.40. Table 1 indicates also that a total of 350 dwellings would take the form of small scale greenfield developments. Mid Sussex DC consider that this would be an appropriate indicative allowance for provision for local needs in smaller settlements, but that there is scope for further such development in sustainable locations without creating an oversupply but assisting with the viability of small communities. In view of this and

of our recommended deletion of the strategic location at Burgess Hill we consider that it would be reasonable to increase the anticipated amount of small scale greenfield development by, say, 100 dwellings. It would be unwise to increase it further as this might fuel unrealistic expectations.

5.41. The strategic location south-east and south-west of Haywards Heath is likely to be able to accommodate more development than the 1000 dwellings anticipated in the DDSP. Mid Sussex DC suggest a probable increase of about 400 dwellings in total. Together with the additional 100 or so from small scale greenfield development this would mean an overall increase of 500 dwellings, which would balance the deletion of the strategic location at Burgess Hill which we recommend under Issue 6(iv).

Worthing

5.42. An inquiry into objections to the local plan whose period runs to 2006 has recently been completed and the Inspector's report received. Modifications will be published shortly and it is hoped to adopt the plan in the first half of 2003.

5.43. The target for PDL in the DDSP is 79%. Whilst this is clearly a challenging figure we note that similar or higher figures have been achieved in recent years, and the local plan anticipates 77% up to 2006. Worthing includes large areas of older development parts of which are likely to be brought forward for redevelopment as and when the market judges this to be feasible. There have been some difficulties in this regard in the past but we understand that the situation in improving. An urban capacity study has been started which will replace the need to rely on the Chesterton study which we discuss under Issue 4. Nonetheless on the basis of present information we consider it likely that adequate PDL will come forward during the first part of the plan period.

5.44. The main commitment in the district is at West Durrington. This is allocated in the emerging local plan. The local plan Inspector refers to the site as being capable of producing 700 dwellings by 2006 whereas the DDSP only assumes about 400. Thus although Westbury Homes point to possible difficulties which may delay construction, it is reasonable to assume that the overall number of dwellings needed for the first part of the plan period will be achieved. We note that a planning application has been submitted and many significant issues already agreed with Worthing BC.

5.45. The total capacity at West Durrington is uncertain. The DDSP indicates that it could accommodate 800 homes, but FPD Savills and others suggest much higher figures up to about 1200 with a minimum of 1000. Worthing BC considers that although a capacity of at least 800 can be regarded as certain, there is increasing uncertainty over any figure above this.

5.46. As there is agreement as to the suitability of the site for development and the need both to make the most efficient use of it and to take full account of the various environmental constraints which apply, it will be a matter for discussion and agreement between those involved as to how both considerations can best be satisfied. As it is however likely that more than 800 will be achieved we recommend that the DDSP should refer to 1000 dwellings. The figure finally approved, together with the yield actually being obtained from PDL, is a matter that will need to be taken into account as part of the monitoring procedures which we discuss under Issue 8. The desirability and practicability of splitting the site into phases and granting permissions

accordingly are essentially matters for Worthing BC in the light of this monitoring, the aims of the local plan and the desirability of maintaining an overall rate of release that is appropriate for the district as a whole.

5.47. The local plan Inspector considered the merits of other possible greenfield sites for residential development, including Lyons Farm and Chatsmoor Farm. In the light of his recommendations, and bearing in mind the likely scale of development at the West Durrington site, we are satisfied that there is unlikely to be a need for further greenfield sites, even as contingencies, within the plan period. The need for or choice of sites in the longer term is not a matter before us.

The Panel's overall conclusions [5(ii), (iii) & (iv)]

5.48. Our examination of the figures in Table 1 of the DDSP on which those in Policy NE1 are based suggests that they are neither unrealistic nor unrelated to the fundamental aims of the plan. We can therefore see no reason to modify that policy. It is however important that the plan should make it clear that Table 1 is indicative rather than prescriptive. It will normally be a matter for the local plans produced by each of the districts to show how the figures would best be achieved for their areas. We therefore recommend that this point should be made more strongly in the EM, to avoid the risk of either unduly constraining the preparation of local plans or of apparently implying that permission should be withheld for proposals that would result in a variation of the figures.

5.49. Although for the most part we endorse the figures included in Table 1, our consideration of the individual districts does lead to some changes. These are however not sufficient to affect the strategic thrust of the plan. In Arun the increase in the size of commitments would be directly offset by the decrease in the size of the strategic location in the west of the district which we recommend under Issue 7(ii). Similarly in Mid Sussex we recommend increasing the size of commitments and small scale greenfield development, offsetting this by a decrease in the amount from large scale greenfield development. In Chichester we recommend a small reduction in the scale of unidentified PDL, which however would be offset by an increase of a similar size in commitments in Worthing. In view of their location in the coastal area this would not affect the strategy of the plan.

5.50. Table 1 has a column headed `small-scale greenfield' which includes all greenfield sites of under 500 dwellings. It is intended in part to give an indication of the scale of development likely to be generated by local needs in villages and smaller towns. We discuss the importance of such provision under Issue 11 where we conclude that assessments of its scale should be done locally in relation to individual settlements. The figures given in Table 1 appear to be a mixture of a rough assessment of such needs and residual figures after taking account of commitments, PDL and larger greenfield sites. They are therefore no more than a generalised guide to the possible scale of need for such sites, and it is especially important that excessive weight should not be put on them.

5.51. Under Issue 8 we discuss the importance of the delivery of the overall figures and of careful monitoring of the situation.

Recommendations

5.52. We make the following recommendation.

Recommendation 5.2

Add to the Explanatory Memorandum to Policy NE1 a warning that the figures in Table 1 are intended to be indicative rather than prescriptive, and that they do not form a part of Policy NE1. The Table should be varied as follows:

Arun **Add 250 to the figure for Commitments and reduce that for large-scale greenfield by the same amount.**

Chichester **Reduce unidentified previously developed land by 200.**

Mid Sussex **Add 400 to the figure for Commitments and 100 to that for small-scale greenfield, and reduce that for large-scale greenfield by 500.**

Worthing **Increase Commitments by 200.**

CHAPTER 6

ISSUE 6 THE STRATEGIC LOCATIONS (NORTH EAST OF THE COUNTY & A23 ROAD/RAIL CORRIDOR

Do the new strategic locations identified in Policy LOC1(b)(2)&(b)(3) offer the best opportunities for sustainable strategic development?

Background

6.1. Under Issues 1, 2 and 3 we looked at the development strategy in general terms to consider whether it relates to regional planning guidance and whether it is the most appropriate strategy for delivering the required quantum of housing. In other words we looked at the broad picture regarding where development might go and why. Under Issues 6 and 7 we are looking in greater detail at the specific locations proposed in the structure plan for strategic scale development. To answer the main question posed under this heading we need to understand what those proposals might mean for the areas in which they are located, how they would work in practice and how they relate to government guidance and the wider provisions of the plan. We must consider whether we should endorse the strategic locations as proposed, and if so decide whether we agree with the numbers of dwellings put forward and assumptions about their deliverability in the plan period. If we have concerns about a proposal we must consider how the plan might need to be changed so as to ensure that the required housing numbers are delivered.

6.2. The DDSP briefly describes these strategic locations in paragraphs 76 and 77, which mix a brief description of the reasons for their choice with notes on infrastructure required before they are developed. WSCC's Proposed Changes would remove much of the latter to a new appendix which would set out these various requirements. We recommend under Issue 3 that this appendix should be revised to include those requirements which are likely to be needed as a consequence of other policies of the plan.

The main issues

6.3. For each of the four locations in the north east of the county and the A23 road/rail corridor the main issues identified are:

(a) What would be the impact on features of acknowledged importance and what are the environmental constraints (including the risk of flooding and the impact on strategic gaps)?

(b) What are the transport implications and needs?

(c) What would be an appropriate timescale for development having regard to the necessary infrastructure provision and how much development could realistically be provided?

(d) Are there alternative and better locations for strategic development close by?

ISSUE 6(i) WEST OF CRAWLEY

The DDSP proposal

6.4. There seems to be general acceptance that Crawley is a good location for strategic development in the context of regional planning guidance and the plan's overall strategy. Indeed, our findings under Issue 1 support this view. The question is where should the development be located in or around Crawley? WSCC has considered alternative locations and concluded that west of Crawley would have most benefits and be the least damaging. It envisages 2500 homes there starting after 2006 and it shows on the key diagram an area of search around the western edge of the town. This falls primarily within Horsham district but there is a small area of open countryside here which lies within the borough of Crawley. As existing roads towards the town centre are constrained, WSCC maintains that it would be necessary to serve the development mainly from a new western relief road (WRR). There would also be high quality public transport and a new or improved railway station. WSCC confirmed at the EiP that development would be on the neighbourhood principle but that there were no preconceived ideas as to whether it should be a single development or a series of linked developments.

6.5. There is support for the west of Crawley location from a range of interests, including CPRE, Mid Sussex DC and developers, notably English Partnership and Crest. Others point to the area's deficiencies as a location for strategic development. Crawley BC and Horsham DC, whilst not objecting outright, say it is premature to identify the west because it has not been fully investigated and agreed.

Impact and environmental constraints

Countryside assets

6.6. Local people obviously value highly the countryside to the west of Crawley and the local groups and organisations reject WSCC's contention that it is of relatively low agricultural and landscape value. Our attention was drawn to the leaflet 'Ifield and beyond, a taste of the Sussex countryside', produced in 1977 by the local councils and the Countryside Commission and extolling the rural virtues of the area (document O0013/AD). Ifield Village Association refers to the presence of ancient woodlands and SNCIs amongst other environmental assets. These views are supported by the Sussex Wildlife Trust and English Nature who stress the area's very well identified countryside features and its importance for wildlife, particularly birds.

6.7. We acknowledge, as does WSCC, that much of this area contains pleasant countryside containing valued assets, but then so does every other proposed strategic location and we must ask whether there are particular and strong arguments that suggest that development should not be considered at all. We note that there has been managed retreat of the countryside since the New Town was commissioned and development now proposed would continue that process, though we accept WSCC's point that it becomes more difficult as the distance from the centre increases. As regards the possible arrangement of development to minimise its impact on the natural

environment and wildlife, we understand the Wildlife Trust's concerns about animals and plants not becoming isolated in small pockets of retained habitat and we see some value in Crawley BC's 'string of beads' concept as a possible way around this, with development interspersed with sizeable open areas which themselves would be linked. We also note that some of the most valued habitats are at the northern end of the area where development is likely to be constrained by aircraft noise, and English Partnership's claim that woodland areas can be safeguarded.

6.8. From the evidence that we have seen and heard we cannot see that this element of environmental impact is a sufficient reason in itself for rejecting this location, but we agree with English Nature that more detailed work needs to be done to fully understand the problems, and with Horsham DC that mitigation measures need very careful planning if they are to be effective. We do not doubt, though, that they can be made so and we would stress the importance of involving local people and appropriate organisations in the process, for their input based on local knowledge is invaluable, not least to identify how environmental gain might be maximised.

The Strategic Gap

6.9. A number of participants raise the impact on the Horsham/Crawley strategic gap. This is one of the wider strategic gaps referred to in the DDSP and WSCC's view, supported by the developers, is that development will provide opportunities to define it by providing strong landscape features. As we explain in Issue 11, our fundamental concern is more with maintaining the separate identities and character of settlements and avoiding coalescence, which we see at the root of the strategic gaps policy. This is also the particular concern of those participants representing village interests in this location. We take English Partnership's point that a long term defensible boundary to Crawley will be possible and we consider this important, but in our view emphasis would need to be placed on keeping development well away from Faygate and from Rusper and its associated settlements. In this respect we acknowledge that the 'string of beads' approach referred to above would most probably minimise the impact both on the strategic gap generally and the villages specifically by keeping development relatively close to the existing urban area. That is not to say that we are endorsing this approach; all options would need to be fully tested. Overall, in terms of impact on adjoining settlements, we see no fundamental problems arising that careful master planning and good design could not address.

Flooding

6.10. Another environmental issue is flooding and Ifield Village Association has particular worries on this score. Horsham DC sees the main problems localised on the Crawley side of the boundary by Ifield brook. The EA's position is that there is no fundamental objection to development on account of flooding, which it says is an issue everywhere, not just at Crawley. It points out that investigations are very much more stringent now because the issue has come to the fore in recent years. It accepts that surface water run-off could exacerbate problems as some suggest but it is satisfied that this can be managed through sustainable drainage systems and storage areas here. Despite the questions raised by some participants, we accept the evidence of the EA on this matter in the absence of any contrary technical evidence. WSCC

says the necessary infrastructure can and will be provided early in the process but emphasises that the structure plan must give a clear steer on the location so that the service providers can get on with the job.

6.11. Bringing these matters together, we accept that there are numerous constraints here, as indeed there are at all the locations we are considering, but we do not subscribe to the view that they are such that virtually no land would be left for development. We are satisfied that through careful master planning and local involvement in problem analysis and possible mitigation measures, a satisfactory outcome could be achieved. We say more under the heading 'Timing and Capacity' having considered other issues concerning development here.

Transport implications and needs

The Western Relief Road (WRR)

6.12. WSCC stresses that the road required to service the development would be a single carriageway relief road and public transport spine, not a new bypass for Crawley. It acknowledges that it would improve surface access to Gatwick Airport and address current problems of rat running but it says the emphasis would be on its use by public transport. It dismisses English Partnership's and CPRE's contention that it might be possible to avoid building the road if high quality public transport were available, pointing to the road's public transport role and the wider benefits that it would bring. This view would appear to be supported by Crawley BC's argument that good public transport alone is unlikely to satisfy transport needs, and the fact that existing road connections to the town centre from this area are notably poor, with access only at the extreme north and south.

6.13. We accept the point that the existing local road network is not conducive to accommodating a lot of extra traffic and agree that there will be a demand for better road connections. It would seem to us that a new distributor road that takes pressure off the local roads is a necessary component of development here. We understand concerns that there would be local access problems even with a new road, for example because new residents will want to reach Ifield station, but we are satisfied that through detailed design work the impact could be minimised and we note that WSCC intends that links into existing neighbourhoods would be on foot, by cycle or on public transport. Whether the WRR will become a traffic generator in its own right, as some argue, or will attract a lot of long distance through traffic, will also depend to a great extent in our view on detailed design. Certainly the emphasis should be on providing local accessibility so as to reduce impact on existing neighbourhoods, and indeed areas further afield, and on public transport, particularly fast access to Gatwick and the town centre. We note that the Highways Agency raises no objection in principle, though it stresses the need for transport assessments that consider the cumulative impacts of developments that could detrimentally affect the M23 junctions and Gatwick Spur. We also note that it wants any consequential highway improvements to the motorway junctions implemented prior to development.

6.14. English Partnerships and others argue that the WRR would be a major project and its cost would be substantial, not least because of multi-ownership of the land required.

CAUS considers that because of this and other demands developers would be able to offer very little in the way of affordable housing. WSCC refutes this, pointing out that all the additional costs and demands would be offset by lower land values. We accept this point and comment further under Issue 10(ii) (paragraph 10.42.). It also makes it clear that it would use compulsory purchase powers if necessary and that the Lands Tribunal would ensure that it would not be held to ransom by individual owners. We have no doubt that it would be a major project but it is the type of road that has been provided in connection with development in other locations and we see no reason that it would not be feasible here given the scale of new housing envisaged. We acknowledge that a relief road could have significant environmental impact but given its modest scale and the ability to relate it to the landscape regime we do not consider that it would cause unacceptable harm. Its satisfactory assimilation would need to be a key requirement of the design brief.

Public transport

6.15. There are two public transport proposals related to this location; Fastway and a new parkway station. Fastway is a bus initiative that uses a combination of guided buses and conventional services as part of a comprehensive integrated transport system for the Crawley, Gatwick and Horley area. Phase 1 will be completed in 2005 according to FPD Savills (for Crest). Crawley BC says there are no firm proposals for linking the system into this area but accepts that it could be done. It makes the point though that there would not be comprehensive coverage by Fastway; conventional feeder bus services would also be required. We see Fastway as a major asset at Crawley. Any development at this location would need to be designed around the system and its feeder services, with the WRR being a key element as WSCC proposes. We believe that Fastway with its fast and direct links into the town centre and to other parts of the town will offer real advantages over the private car, which will be dependent on the more circuitous WRR, and as a consequence we consider that modal choice will be influenced from the outset. Fundamental will be the segregation of all buses from other traffic wherever congestion occurs, plus other bus priority measures. The system would also need to be in place when the first new homes are occupied.

6.16. The proposed parkway station is a more contentious issue. As WSCC sees it the location would be where the WRR crosses the railway line just north of the A264. Crawley BC and Horsham DC take the view that it is premature to designate this location, partly because they want other locations around Crawley properly considered as potential strategic locations as we discuss below, but also because they are not convinced that a new station of this type is what is required. Taking this second point, the alternative to a new station if development were to go ahead at this location would be the improvement of Ifield station, which we acknowledge is important and well used. However, there seems to be very limited scope there to carry out any major improvements or to provide car parking, though we accept that some enhancement would be possible.

6.17. We see a new station having an important role in encouraging public transport use and would support the provision of such a facility to the south west of Crawley in association with any development here. That is not to say that we believe that new houses have to be in this part of the search area. The important consideration is ease

of access by bus and other sustainable modes as well as by car if there is to be any significant car parking. We would prefer the term 'new interchange station' to signify that it is not primarily to attract car users. Nevertheless it may well have advantages in terms of park and ride for those coming from Horsham and beyond and wishing to avoid the congestion in and around Crawley, though it would be preferential if such users would make the whole journey by rail or at least transfer to rail closer to home.

6.18. We note the concerns about another station having to close should a new station be provided close by. We have no specific information from the train operators or from the Strategic Rail Authority on this but we understand that for operating reasons it is a distinct possibility. We certainly would not wish to see Ifield station closed; it will have an enhanced role if there is development near by. We have no particular concerns, though, about Faygate station which serves a more limited catchment. The new station would be close by and relatively accessible and is likely in any case to provide a much better level of service given the additional demand.

6.19. Overall this location could be highly sustainable in transport terms with a choice of high quality bus services and a rail service to the centre of Crawley and to Gatwick Airport. We do not believe that it would be car dependent simply because a new road is proposed. As we indicate above it all depends on how the road is designed and whether public transport offers real benefits and advantages over car use. We believe that WSCC's proposals for transport represent a balanced approach recognising the likely difficulties of servicing development from the existing road network, existing problems of congestion in this part of Crawley and the fact that public transport is unlikely to cope with all travel demands even with a significant modal shift in its favour.

Timing and capacity

6.20. Participants who see problems of delivery at this location if it is accepted cite three factors which need to be considered: provision of the road infrastructure, the potential impact of airport expansion and the local plan process. Some of the issues regarding the road have been touched upon above. We are satisfied from what WSCC has said that issues arising from multi-ownership can be addressed but we accept its point that the process needs to start early to avoid possible delays. Of greater concern is the impact of possible airport expansion on the WRR. The northern end of it around Lowfield Heath, though outside the area of search relating to this development location, passes through an area that would certainly be required if there were to be a new wide spaced runway and would most probably have to be realigned if there were to be a close parallel runway. Having regard to what we have said under Issue 3 on airport expansion (see paragraphs 3.18.-3.22.), there will be a delay of two years or so while this matter is resolved and so detailed design work would not be able to proceed and this could set back the process of land acquisition. In our view this will not represent a crucial delay but it could present problems if associated with unforeseen difficulties.

6.21. The same issues relate to the timing of the development generally and therefore to the number of dwellings that might be possible. The area potentially affected is greater than that for the road because of the noise shadow. A wide spaced runway could alter

dramatically the size and location of the area potentially available for development but as we have said, the whole strategic planning context would change if airport capacity at Gatwick is substantially increased. The close parallel runway would allow development across the whole area of search but it may be necessary to concentrate employment uses in the noisiest locations if they were not be left undeveloped to protect habitats. As far as numbers are concerned we are satisfied that given careful analysis and planning the area of search is such that 2500 dwellings could be accommodated, even if there are constraints at the northern end. Given the uncertainties regarding the airport, the major area of concern which the structure plan can realistically consider is delay and its implications, not as George Wimpey suggests the principle of development.

6.22. To some extent whether there will be delay will depend on the local planning process and how it relates to what is happening in respect of the airport. Horsham DC's view is that its local plan will be adopted in 2007 and so development could be on the ground in 2008. We are more inclined to accept its scenario based on first hand knowledge of the situation than more gloomy ones (notably DPDS). We note that Horsham DC has already undertaken work on this location and we agree with WSCC that there is no reason that rapid progress should not be made prior to local plan adoption once the general location is settled. A 2008 start would deliver 2500 homes by 2016 given an annual average build rate of between 250 and 300 per annum which does not seem an unreasonable proposition. If the airport situation (or any other factor) pushes this timescale back then we have to accept that there could be a shortfall.

Alternative locations

6.23. Developers have put forward other locations for strategic development at or near Crawley, not necessarily alternatives to the western location, and see real benefits in these locations. There is not surprisingly some support from local organisations in the western sector for a location to the east of the town. The alternatives are east of Crawley, that is east of M23 junction 10, south of Crawley, that is close to M23 junction 11, and Faygate. As already indicated, Horsham DC and Crawley BC consider that other alternatives on the edge of Crawley should be further investigated. They take the view that alternative locations may offer better accessibility to the town without the need for major road infrastructure, and their contention is that WSCC has given undue weight to policy constraints in these locations, and that further studies should be undertaken. This view is supported by Lamont Planning and George Wimpey who are promoting the east and south locations respectively.

6.24. The Faygate proposal promoted by Richard Maile would not be in line with the plan's strategy and would be contrary to PPG3. Faygate can hardly be described as an urban extension or a nodal point in public transport terms. We do not consider it as a serious contender. East of Crawley is a different proposition but WSCC sets out in its statement on Issue 6 a list of reasons why the location is inferior to the west and its views are supported by Mid Sussex DC in whose area the location falls. A principal concern in our opinion must be potential coalescence with the settlement of Copthorne which would result in a sprawl eastwards from Crawley. We also have concerns over pressures on junctions 9 and 10 of the M23 and on the A264, especially

given the proximity of the north east sector development. We are less convinced by WSCC's argument that development here would be less accessible and socially isolated. In this respect we have some sympathy with Crawley BC's view that the M23 is no less of a barrier than the maze of local roads that adjoin the western location, or the London-Brighton railway line as it runs through the town. Having said that, we accept that the M23 is a well defined and defensible boundary to the urban area, beyond which there are vulnerable settlements. We offer no opinion on the impact on the High Weald Area of Outstanding Natural Beauty; this would have to be tested.

6.25. Turning to the area south of Crawley, which straddles both the M23 and the Crawley/Mid Sussex boundary, similar criticisms are made by WSCC and Mid Sussex DC, the coalescence in this case being with the small settlement of Pease Pottage. The main area of contention here would appear to be the impact on the AONB, though George Wimpey argues that its boundary based on the motorway is one of convenience and lacks any real justification. Again this would need to be tested. We accept that the area to the north of the M23 alone would not be large enough to accommodate strategic scale development, so this would be a location divided by the motorway. We set out our conclusions with regard to these locations and whether they merit further consideration in the following section.

The Panel's overall conclusions

6.26. On the face of it the proposed location to the west of Crawley is acceptable. We have heard and seen nothing which suggests that in principle development should not go there and our only concerns are with possible delays connected with the government's airport consultation process. However, even these would not have a serious impact on development in our view, particularly if the outcome were to be that no second runway was to be built at Gatwick. Nevertheless we are aware that Crawley BC and Horsham DC, with some support from local groups, think that it would be premature to designate the west because there are other areas that should be given prior consideration. Crawley BC argues for a more broad designation 'at or close by around Crawley' which would allow for this flexibility rather than a commitment to the western location.

6.27. Having regard to these views we have given very serious consideration to how strategic development requirements at Crawley should be provided for in the structure plan, and to the implications of conceding to the request for flexibility. We have concluded that the western area should be designated as WSCC proposes. We set out our reasoning below.

6.28. Firstly, and most importantly, we consider that there is a need for the structure plan to give a clear steer so as to provide certainty and avoid delays. WSCC stressed this throughout the Issue 6(i) debate. We have indicated under Issue 3 how much weight we place on delivering the required quantum of housing and we wish to avoid any delays which might jeopardise this. We are very aware that here, unlike at Chichester where we face a similar problem, there are three local plan processes, all with different time frames. If the structure plan provides no clear steer then the process of selecting and designating a strategic location could become very complex and

protracted, and there is in any event no obvious mechanism for the decision making process. The structure plan on the other hand provides a way forward at this stage.

6.29. Secondly, we consider that development near to Crawley is imperative given the thrust of RPG9 discussed under Issue 1. Horsham DC and Crawley BC are not opposing the west of Crawley location in principle; indeed Crawley BC sees it as potentially part of a package of proposals which concentrate development around the town rather than dispersing it. Its criticism seems to be more about priorities and timing. Again, in the interest of making progress towards delivery more quickly, we take the view that it is fully justified to designate the west now, there having been consultation on it as part of structure plan preparation and no fundamental flaws identified through the EiP process. We would add that there are particular issues relating to the alternative locations, as outlined above, which in our view cast some doubt on whether they should indeed be considered prior to the west.

6.30. Thirdly, if there were to be a broad designation, the allocation of dwelling numbers to the respective districts would be haphazard and confusing and contrary to the provisions of PPG12 which requires there to be an unambiguous allocation. Admittedly, as GOSE points out, there is a way around this by including explanations in the text about what is proposed but there would remain a lack of clarity and certainty which we consider undesirable.

6.31. Lastly, we believe that in the best interests of the town's social and physical infrastructure, and having regard to possible impacts on the M23 and its junctions, there needs to be balance around Crawley in terms of how major new development is distributed. We have accepted that the north east sector should go ahead as a first phase and we are recommending development at East Grinstead. Development to the west of the town would disperse the impact of construction and of newly generated traffic whereas development to the east would serve to concentrate pressures in one quarter centred upon M23 junction 10.

6.32. We still see merit in undertaking further studies of the other possible locations, though not to inform the key provisions of this structure plan. There is likely to be a need for additional strategic locations at or around Crawley at some time in the future and possible options for that longer term need may well need to be taken into account in the process of planning the locations developed in this plan. Additionally, if monitoring procedures relating to the delivery of housing in this plan period show that things are not going to plan and that there will be a shortfall in provision in the wider Crawley/Gatwick area, a case might be made, if no other option is available, for the early release of a location identified through this study process. We therefore recommend that WSCC and the three local councils should continue their joint working to assess the possible contribution of other locations and test the impacts that have been identified as being of concern.

6.33. We have studied the Strategic Development Principles relating to this location (Proposed Change PC/60) and are satisfied that they are appropriate in the context of our conclusions and recommendation. From our findings under Issue 10(ii) we propose that an additional bullet point be added as indicated below, and we also make a recommendation in respect of Policy NE19(b)(5). We would advise that reference

to Fastway in the third bullet point should refer to Policy NE13 rather than Policy NE14.

Recommendations

6.34. We make the following recommendations:

Recommendation 6.1
West of Crawley should be retained in the structure plan as a strategic location, and reference in the EM to it accommodating 2500 homes in the plan period is endorsed.

Recommendation 6.2
The following changes should be made to the Strategic Development Principles added by PC/60, relating to the Crawley location:

(a) Reference should be made in an additional bullet point to the need for increased capacity at the Crawley sewage treatment works.

(b) For consistency with Recommendation 11.4 the last bullet point should be altered to read 'Development should avoid the coalescence of Crawley with any other settlement including Rusper and Faygate'.

Recommendation 6.3
Reference in Policy NE19(b)(5) should be to an Interchange Station west of Crawley rather than a Parkway Station.

Recommendation 6.4
Joint studies should be continued with a view to identifying an additional strategic location on the perimeter of Crawley for longer term needs and as a possible contingency should there be a shortfall in provision in the wider Crawley area that cannot otherwise be met locally.

ISSUE 6(ii) WEST AND/OR SOUTH WEST OF HORSHAM

The DDSP proposal

6.35. WSCC considers Horsham to be a good location for strategic development by virtue of its proximity to the Crawley/Gatwick magnet and position on the transport corridor between Crawley and the south coast formed by the A264/A24 and the Arun Valley rail line. In view of the town's recent significant growth it sees potential to contribute to the strategic requirement after 2011 rather than sooner. It proposes 1000 homes by 2016. The key diagram shows one general location for development, not an area of search. WSCC looked at locations around the town and concluded that development to the west and/or south west of Horsham would have the most benefits and cause least damage, especially in landscape terms. It sees the need for passenger transport and other transport improvements, notably junction improvements on the A24 Horsham western bypass. Indeed, Appendix 2 of the Revised Background Paper on delivering the development strategy says that the actual location of development is critical in terms of encouraging rail trips.

6.36. There is support for this location from Mid Sussex and Horsham DCs. The latter wants a wider area of search so that the area west of Southwater can be considered. There is support also from developer interests. Most want the timing to be brought forward but there are differing views as to where development should take place and on how much will be feasible. Some see only limited potential. The CPRE and local organisations are very much opposed to this location for any strategic scale development and some are particularly opposed to development west of Southwater because of its impact on the countryside and the strategic gap and the suburbanisation of what is in effect a separate village.

Impact and environmental considerations

6.37. As at Crawley, WSCC maintains that the countryside here is of relatively low landscape and agricultural value but local groups, notably the Sussex Wildlife Trust, disagree. The Southwater Action Group (SAG) says it is attractive old lowland Sussex countryside and the Weald Vale Association Ltd (WVAL) says it is well used by local people. There are particular worries about the ecological and environmental impact should development go to the west of Southwater which we say more about below. It would appear to us that the impact is likely to be greater further south from the immediate environs of Horsham and the choice of location is therefore a crucial factor. However, we do not consider the countryside impact need be a major constraint to accepting this general location for development. We take the view that it can be satisfactorily accommodated given careful planning and mitigation with the help of local groups.

6.38. There is general acceptance that there are drainage issues in this location and the EA accepts that the floodplain is quite extensive. It also takes SAG's point that SUDS are not always appropriate as a means of dealing with the problem because of the nature of the subsoil, and suggests that storage systems would be needed. It is not against the principle of development here though it accepts that it would be limited near the River Arun at Broadbridge Heath. We agree that flooding does constrain significant areas

but certainly not all and our conclusions on capacity reflect this. We note that the sewage works is at capacity and the claims by SAG that it is polluting the River Arun downstream. EA points out that improvements are proposed in the period 2005-10. This would relate well to the possible timing of development here given other requirements.

6.39. Staying with the sewage works, it is cited by local groups as a major constraint because of smells. We agree that development would need to be kept well away from the facility but floodplains may dictate this in any event, and the land closest to the works on the other side of the A24 might well be the best place for car parking associated with a new station, should it be located here. The Baystone landfill site to the west of the sewage works is also seen as a major constraint. The Weald Vale Association (WVA) describes it as one of the most toxic in the UK and adds there are other problems relating to tipping in the old railway cutting. Again, we accept this as a factor affecting the scale and location of development but not one that prohibits development since there would seem to be opportunities well removed from the immediate impact of the Baystone site. Based on Fletcher Trust's assessment it would seem that tipping at the railway cutting presents no risk.

6.40. Turning to the question of the strategic gap and likely impact of development on it, there are a number of interpretations of the importance, nature and role of this gap. Local groups appear to place much importance on its preservation. WSCC says that development presents an opportunity to enhance it. We note that it is two or three miles in extent but there is some development within it, notably Christ's Hospital school, and we must conclude that it is vulnerable. As we indicate under Issue 11 we are more concerned about coalescence and the loss of settlement identity than with the concept of a strategic gap as such. We certainly see the need to maintain the separation of Horsham and Southwater and to avoid the southward sprawl of Horsham in this respect. There are particular concerns about how development west of Southwater would impact on the gap and we say more about this below. We cannot see how development further north will be detrimental if it is contained north of the railway line.

6.41. As regards settlement identity, residents there clearly see Broadbridge Heath as separate from Horsham, though it is only separated by a narrow strip which is the A24. Horsham DC's view is that is a detached suburb functionally linked with Horsham. In our view there is already coalescence here making Broadbridge Heath effectively part of the Horsham urban area, though that is not to say that it does not have a separate character and identity by virtue of its separation by the A24. If there were to be development around Broadbridge Heath it should respect and enhance that character and identity. It would also need to avoid the threat of coalescence with Warnham to the north.

Transport implications and needs

The road network

6.42. Local groups refer to serious peak hour congestion on the A24 around Horsham and consider that more action will be needed to address the problems than is seemingly

proposed by WSCC on the western bypass. SAG sees the need for improvements at the Great Daux roundabout which has not been mentioned by WSCC, and ITPS says that all the junctions will need to be improved. WSCC acknowledges that more work will have to be undertaken to identify what action is required at the junctions along the bypass. We accept that it is not possible to be precise until the extent and location of development is known but we agree with ITPS and others that improvements need to be in place before development comes forward given the apparent scale of the existing traffic problems. This should be a key requirement placed upon the developers. We note that Berkeley Strategic Land and DPDS see opportunities for bus priorities as part of junction improvements. In the light of what we say below we place great importance on this and would wish to see it reflected in the Strategic Development Principles (SDPs).

6.43. Road congestion is a problem in all the main towns and we do not see it as a reason for prohibiting development. We have no doubt that there are particular problems at Horsham and as well as junction improvements there will need to be a very strong emphasis on sustainable modes as a consequence. Given that emphasis and the new opportunities that it creates, we are optimistic that development here will not be car dependent as some fear. We are also hopeful that the modal choice of those already living in the area can be influenced, and in this respect development here could have a positive impact.

Public transport

6.44. There is general agreement that high quality bus services will be required to link new neighbourhoods with the town centre, rail services and other facilities. Conventional bus services will not suffice and from experience around the country will not tempt people out of their cars to a material degree. Something special and radical will have to be offered featuring significant bus priority measures which give buses a major advantage over private cars. The SDPs should reflect this. Development will need to be planned around such provision as well as other sustainable transport modes and the new services must be available at the outset in order to influence modal choice. Though not strictly a matter for the structure plan it will be important, as WSCC has indicated, to give early consideration to the town centre parking regime and to other aspects of demand management so as to further favour public transport use in line with what is said in the draft Regional Transport Strategy.

6.45. As regards rail transport there is controversy here, as at the west of Crawley, about what might be needed to secure improved access to services. WSCC proposes in Policy NE19 that Christ's Hospital station be upgraded to improve the integration of transport in association with strategic scale development. Developers and some local groups point to the difficulties in reaching this station from the strategic road network. Berkeley Strategic Land points out that it is not well located in relation to existing and likely future passenger catchment areas. Berkeley proposes the relocation of the station to a site to the east of the A24 where it would be integrated with a park and ride facility.

6.46. We agree that Christ's Hospital station may not be in the best location to optimise rail travel and modal interchange. Nevertheless, until the precise location of strategic

development is known it would be premature in our view to specify an alternative and we agree with Berkeley that the matter should be left more open. Our recommendations relating to Policy NE19 reflect this view. We do feel strongly, though, that a much improved rail interchange is required and we see it as part of an integrated sustainable transport package at Horsham. We note that Horsham station in the town centre has only limited parking provision and this could well influence people's choice of mode. Park and ride at a new or improved station with easy access may well attract car drivers onto trains and would fit in with what we say under Issue 6(i) (paragraph 6.17.) about getting drivers onto trains nearer home.

6.47. Having said this, there is the issue of what quality of service is likely to be offered on the Arun Valley rail route south of Horsham. WSCC is optimistic that the service will be improved. It refers to the proposed construction of the Arundel Chord which will enable trains to access the south coast line westwards and believes that given the promised signalling upgrade four trains an hour will be offered through the Arun Valley when this is operational. It also says that Thameslink is due to come to Horsham and might even venture further south. The Strategic Rail Authority (SRA) is less than forthcoming on the prospect of improved services along this line in its statement and we are not aware of any firm proposals. There is nevertheless a major hope factor since an upgrade of the line is included on its list of potential infrastructure works (paragraph 5.20 of its statement). Given the likely ease of access to a station the lack of commitment to improved services is not a reason for abandoning Horsham as a strategic location but it is a concern because of rail capacity problems which might arise without them. WSCC should make strong representations to the SRA for a better service based on likely future demands along this corridor. It should also investigate the case for terminating facilities to be provided at any new or improved station so that it is not necessary to go into Horsham to catch trains which otherwise would start there. This is another deterrent to rail use in our view.

6.48. There was some criticism at the EiP by SAG and the Parish Councils of existing park and ride schemes. Their argument is that people will not drive to a park and ride facility; once they are in their cars they will stay in them for the whole journey. We agree that this may be so if the public transport available offers little advantage and if parking is readily available at journey's end. We do not agree that park and ride has no role to play in Horsham, but more emphasis should be given to rail park and ride to attract the long distance commuter, and to quality bus services that penetrate residential areas so that journeys start on public transport.

Timing and capacity

6.49. Before considering what scale of development might be possible in this location in the plan period, and since it has some bearing on the matter, we wish to comment in some detail on the notion that the area west of Southwater should be included.

Development west of Southwater

6.50. Berkeley Strategic Land is promoting a package of mixed use developments comprising the three locations Broadbridge Heath, land between Horsham and the A24 and west of Southwater which it claims would be integrated and sustainable. Other

developers do not agree. George Wimpey says that due to flood plains an unsustainable dispersed settlement pattern would emerge. Local groups are vehemently opposed to development west of Southwater. They see it as urban sprawl at a key access to the rural county, they claim major impact on the strategic gap and important countryside assets, including an ancient woodland, and they say that it cannot be linked effectively with Horsham in transport terms. Though itself once opposing development here, Horsham DC says things have moved on and now believes that the area could accommodate development which would contribute to the existing community in a sustainable manner and help address the needs of the wider area.

6.51. We are not at all happy with the prospect of any significant amount of development west of Southwater in the context of a strategic location adjacent to Horsham. It would be contrary to the plan's strategy which refers to the expansion of selected towns, and thus damaging to the integrity of the plan. It would also be contrary to the sequential approach promoted by PPG3. We maintain that it would not be an urban extension in the context of PPG3 as Horsham DC appears to claim. Southwater is a large, expanded village in the countryside, not an urban area, and it is certainly not part of Horsham, though we accept that they may be functionally linked. Neither is it a node on a good quality public transport corridor as local groups were at pains to point out at the EiP. Notwithstanding the views we express in paragraph 6.55 below, we too have serious doubts about the sustainability of dispersing development so far away from the boundaries of Horsham's urban area where the benefits set out in PPG3 paragraph 67 might be better obtained. We have particular concerns about transport sustainability given the difficulties of integration with Horsham's public transport that would result from its relative isolation.

6.52. Horsham DC stresses that there are specific local needs that have to be addressed here. If that is the case then development should not be promoted under the guise of a strategic location. We agree with those who argue that such needs should be addressed through the local plan process and our proposed Policy LOC1(c) provides the context. We note that Horsham DC did not argue for an increased allocation for the small-scale gradual growth of small towns and villages at the debate on Issue 5. If it had done so in respect of Southwater we may have been sympathetic but we certainly do not view it as part of a strategic location and we see any designation at Horsham as relating to the actual expansion of that town. We therefore do not support the notion of a wider area of search.

6.53. We have reached this conclusion without taking on board the environmental objections which were supported at the EiP by various quotes from the Horsham Local Plan Inspector's report. We do not propose to comment on these. We have considered the matter on its merits in the current strategic planning context and see no purpose in making judgements about what might have been concluded in the past. We would express fears, though, that development at the northern end of the area around Southwater Street could have an impact on perceptions of coalescence and threaten the separate identity of the settlement. With regard to the location of a new secondary school to serve Horsham, a matter which is causing concern to local groups at Southwater, we accept that such a facility is one of the requirements set out in the Strategic Development Principles and that a suitable site will need to be found.

However, its provision should not push major housing development towards a location which cannot otherwise be justified.

Capacity

6.54. We deal first with capacity in the light of what we say about Southwater. WSCC says that 1000 dwellings could be provided in this general location without resort to extending it to include Southwater. DPDS considers that this number can be accommodated around Broadbridge Heath. Both DPDS and Berkeley Strategic Land believe that much larger numbers are possible, 2500 in the case of the former, though this is based on a package that does include Southwater. ITPS are much more sceptical and question whether 1000 would be feasible because of the constraints that are evident. We accept that there are various constraints in this location and consider that numbers would have to be restricted compared say to west of Crawley but we are not convinced that the constraints are such that 1000 dwellings cannot be provided in a sustainable way. We are content to go along with Horsham DC's conclusions. We accept that it will have done a lot of work on capacity and can at least draw upon the results of its study in 2000 referred to by the Parish Councils, even though, as it says, things have moved on. (Documents O0012/AD and G0042/AD) It may be possible to accommodate greater numbers than 1000 but we are not recommending this. There is no need or justification at present and in any event further assessments would be required to test its feasibility. We say more on this in our overall conclusions.

6.55. We acknowledge that there may have to be a degree of dispersal because of the nature of the constraints but the important thing, as Berkeley Strategic Land contends, will be to achieve the most sustainable form of development having regard to those constraints. Provided that development is planned in an integrated way around the periphery of Horsham's urban area and well related to existing communities and services, transport provision and other infrastructure we have no views on what its precise form might be. That said, we do see advantages in maximising development between the A24 and the edge of the urban area as the most obvious urban extension.

Timing

6.56. Since we are recommending that the concept of phasing development at the strategic locations be dropped from the plan we are not so concerned about how development here might relate to a particular phase, but we are concerned about whether it is capable of being completed within the plan period. One constraint on this is the timing of improvements to the single carriageway A24 between Warnham and Capel. We note that these have now been given approval for commencement in 2006 and will take 2 years to complete. There is general acceptance that strategic scale development at Horsham should not proceed until this is complete, which should be in 2008 if there are no delays. Another constraint on timing is the completion of junction improvements on the Horsham western bypass. We have no information on how these might relate to the A24 improvements further north. A view might be taken by WSCC and the relevant district councils that carrying out all these works at the same time would be too disruptive. There may be a case, therefore, for undertaking the junction works in the period immediately after the roads schemes. Depending on the complexity and phasing of the work this might mean that development would not start

on site until 2011 which, as it happens, is roughly in line with what WSCC envisages in the DDSP. This would allow some priority to be afforded to the two strategic locations at Crawley in accordance with RPG and would give sufficient time for 1000 dwellings, or more if required, to be provided before the end of the plan period.

Alternative locations

6.57. Two alternative locations have been suggested, Warnham brickworks by George Wimpey and a new settlement at Kingsfold by ITPS. Both are rejected by WSCC and we agree that neither offers any advantage over the location to the west and/or south west of Horsham. The brickworks, as WSCC points out, would not be contiguous with the boundary of Horsham's built-up area, and therefore it would be difficult to achieve the benefits of urban extensions outlined in PPG3. Moreover, it is likely to be car-reliant because to make a journey eastwards by rail it would be necessary to change at Horsham. As regards Kingsfold this would be a major proposal in the countryside with considerable impact. Such a new settlement would be a last resort if development cannot be accommodated in other ways. We see no need for a new settlement in this plan period and therefore support its rejection. There are other locations around Horsham which, on the face of it, may have potential but we agree with WSCC's analysis of these and conclude that they would not be suitable locations for major development. It is noteworthy that developers have not come forward in the context of the DDSP with proposals for any of these areas.

The Panel's overall conclusions

6.58. We support the designation west and/or south west of Horsham proposed in the DDSP further to Proposed Change PC/17/B which clarifies the description, and endorse reference in the EM to a figure of 1000 dwellings to be provided here in the plan period. We dismiss the suggestion that there should be a broader area of search to include land west of Southwater. Further major development in that location would in our view be contrary to PPG3 and the plan's overall strategy and would be difficult to integrate with the town. An extension to Southwater would be a matter for the local plan in the context of Policy LOC1 rather than a strategic matter. We see the strategic location being delivered by urban extensions to the town of Horsham. We place considerable importance on emphasis being given to sustainable modes of transport since Horsham is not well equipped in this respect at present and would expect to see development planned around a novel and attractive bus system which could also bring benefits to existing areas of the town.

6.59. We have given consideration as to whether the allocation should be increased in the light of representations that capacity is much greater than 1000 and that development here relates very well to the plan's strategy. The point is also made that it might be needed as contingency. In view of our conclusions about the inappropriateness of a strategic role for Southwater and about constraints nearer the town we do not support the idea of a larger allocation and in any event we are not convinced that this is necessarily a better location for strategic scale development than East Grinstead as some claim. We have also had regard to Horsham DC's claim that development here will primarily meet Horsham's longer term needs and we have questioned whether this suggests that the numbers should be increased so that the strategic role can be fulfilled.

We are satisfied, though, with WSCC's explanation of development's dual role as part of its polycentric growth model given the linkages which exist between the town and the Crawley/Gatwick area.

6.60. As regards contingency we make the point elsewhere in the report that Horsham is one of the locations where additional development might be possible to meet any shortfalls identified under the monitoring and management regime that we propose. Though we say that the allocation should be 1000 we have not ruled out the prospect of an increase later if it were to be needed and the capacity is found to exist. We would suggest that the assessment of this location should have regard to this possibility so that sufficient flexibility exists. Horsham DC will in any case wish to consider needs beyond 2016.

6.61. We consider that the SDPs relating to this location (Proposed Change PC/60) need to be modified in ways we have identified above and these are reflected in our recommendations. There is also a need to make a more general reference to station improvements in Policy NE19 in the light of what we say about Christ's Hospital station.

Recommendations

6.62. We make the following recommendations:

Recommendation 6.5

West and/or south west of Horsham should be retained in the structure plan as a strategic location, and reference in the EP to it accommodating 1000 homes in the plan period is endorsed.

Recommendation 6.6

The following changes should be made to the Strategic Development Principles added by PC/60, relating the the Horsham location:

(i) Add to the words in brackets under the first bullet point 'to be specified by the county council and be in place prior to the commencement of development, and improved rail interchange'.

(ii) At the beginning of the second bullet point add the words 'High quality' and at the end add 'and should include significant bus priority measures'.

(iii) Delete the last bullet point and replace with 'Development should protect the character and separate identity of Southwater and Warnham and should not detract from the character and identity of Broadbridge Heath'.

Recommendation 6.7

Policy NE19(b)(4) should be changed to 'A new or improved interchange station south west of Horsham'.

ISSUE 6(iii) WEST OF EAST GRINSTEAD

The DDSP proposal

6.63. WSCC sees East Grinstead as well placed to make a contribution to labour needs in the wider Crawley/Gatwick area in line with RPG, provided that the traffic problems in the town, which have prevented growth in the past, can be resolved. It says development offers both strategic and local benefits and claims that things have moved on since the 1991 EiP Panel rejected this location for large-scale development, including a bypass. Because of the Surrey Green Belt to the north and the High Weald AONB to the south and east WSCC sees the west as the only direction for expansion. It proposes in the DDSP up to 2500 homes in the plan period starting after 2006 (Proposed Change PC/25 removes 'up to') and emphasises that development must be contingent on new transport infrastructure, notably a relief road. The Proposals Map shows one location, not an area of search, but WSCC confirmed at the EiP that it has no preconceptions as to where development might be located in this general area.

6.64. Support for development at this location comes from Mid Sussex DC, East Grinstead Town Council, various developers and, with caveats, CPRE. The developers see opportunity here for suburban extensions free from environmental constraints, though different interests are promoting different locations along the western edge of the town. Crawley BC and Horsham DC take a different view. Apart from arguing that the proposal runs counter to the plan's vision, a contention that we discuss and reject under Issue 1, they maintain that nothing has changed since the early 1990s and they point to severe environmental constraints and a lack of agreement on the relief road which will serve to delay development. There are objections from a number of local groups on environmental and impact grounds. Some other participants do not object in principle to development but are opposed to the associated relief road because of its detrimental effects.

6.65. Before looking into particular aspects of this proposal we should like to comment on whether or not things have changed since the early 1990s as WSCC and Mid Sussex DC maintain. Apart from recognising that an acceptable alternative was available at Crawley, the EiP Panel back then identified a number of negative factors relating to significant growth at this location. There are opposing views as to whether the situation on each has altered. We see no purpose in going through all of them; rather the matter should in our view be considered against the strategic planning context of the present day. In that respect we would argue that the overall situation has changed and we agree with the scenario put forward by WSCC at the EiP. In particular, drawing on what we say under Issue 1, we support the contention that development here accords with the general thrust of RPG9 with regard to the Crawley/Gatwick area. We do so because we are not convinced that concentrating everything at Crawley is a viable or better alternative and we see real opportunities for a highly sustainable public transport link. Noting that there has been no significant growth in the last ten years, we also share concerns about the economic health of East Grinstead and its ability to contribute towards the wider county economy. As far as road proposals are concerned we accept that problems remain but they are not insurmountable in our view and in any case they now have to be seen in a different light given the changed strategic situation.

Impact and environmental considerations

The countryside and town

6.66. We deal here with the impact of development generally, not that associated specifically with the relief road which we refer to later. WSCC accepts as it does at Crawley and Horsham that this is pleasant countryside but says it is of low landscape and agricultural value. The Association of Imberhorne Residents points out that it is much used and valued for recreation of various types, particularly the Imberhorne Farm area. The East Grinstead Society refers to archaeological interest in the fields to the west of the town. It also expresses fears that the current ambience and character of the town itself will be ruined by an oversized development.

6.67. We note these concerns but do not think that they significantly distinguish this locality from many others in West Sussex. Therefore we do not see countryside impact as a reason for disregarding the location as one with development potential. Nonetheless every effort will need to be made to minimise the impact and much will depend on the precise nature of the development as we indicate below. The impact on the town of what would be a significant expansion, is an important consideration in our view, though again not one which makes development undesirable. On balance we see the economic advantages that development would bring, as stressed by Mid Sussex DC and the Town Council, as outweighing the possible impact of a lot more residents.

The strategic gap

6.68. A major local concern is the impact on the strategic gap between East Grinstead and Crawley. Local groups think that it will be severely damaged, WSCC and other supporters of development here claim that 2500 homes can be accommodated without threatening the separate identities and character of East Grinstead, Crawley and settlements in between. Indeed they believe development could define and enhance the strategic gap. Barton Willmore, who is promoting on behalf of a consortium development based on Imberhorne Farm, indicates this would be achieved through structural landscaping and the distribution and management of open space. As we say under Issue 11 we are concerned with preserving the identity and character of settlements and with avoiding coalescence, not so much with the concept of strategic gaps. It seems to us that settlements between Crawley and East Grinstead are particularly vulnerable since there is already a significant element of urbanisation here. We do not doubt that development west of East Grinstead is possible without coalescence occurring but we are aware that there are different perceptions of coalescence and we do have concerns that even with the most well planned landscaping the perception here is that East Grinstead and Crawley Down could effectively become linked.

6.69. We appreciate that the master plan produced by Barton Willmore as an appendix to its submission is for illustrative purposes only and it is in that context that we refer to it. It shows development spreading westwards from East Grinstead into the gap that currently exists between East Grinstead, Felbridge and Crawley Down. This form of development would distort the urban form of East Grinstead and give an impression of

urban sprawl between East Grinstead and Crawley in our view and we have serious doubts about whether it would safeguard the separate identities of Felbridge and Crawley Down in the minds of those who live in those settlements. We acknowledge that the location of development is a matter for the district council through the local plan process but we would offer strong guidance that a form of development that wraps around the western side of East Grinstead rather than projects out from it is much more in keeping with the DDSPs strategy for the county's settlements and the relationship between them and with PPG3's concept of urban extensions that relate well to existing communities. It would also make countryside access easier for existing residents who are quite clearly concerned about the loss of this amenity.

6.70. In this respect we support the suggestion by Crest Strategic Projects that the designation should be changed to 'west and south west of East Grinstead'. This would allow a full and proper assessment of the potential for development along the western edge of the town outside the AONB.

Transport implications and needs

6.71. This is the most controversial of all the proposed strategic locations as regards traffic and transport. As well as the relief road WSCC envisages improvements on links to and at junction 10 of the M23 and public transport links into the town and to Crawley/Gatwick. It also envisages an improved interchange at East Grinstead station.

Public transport

6.72. There is general agreement that a high quality transport link will be required between East Grinstead and Crawley/Gatwick. WSCC says that this could possibly be an extension to the Fastway system in Crawley but as we say under Issue 10 it would be better to think more openly about the precise nature of such a link. We take the view that something novel and attractive will be required to achieve a shift towards public transport use and it will certainly need to offer real advantages over the private car in terms of speed and accessibility. Perhaps the emergence of a green transport plan and tighter parking controls at Gatwick will assist its viability. It will need to penetrate the new residential areas and operate free from restrictions imposed by congestion, particularly at the M23 junctions. Frequency, priority over other traffic and a considerable degree of segregation will need to be key features throughout its length and it should be up and running at the start of development so as to influence modal choice. One route option which should not be ruled out is the former Three Bridges to East Grinstead railway line, now used as a footpath and cycle way (Worth Way). It is regrettable that part of this has been built over at Crawley Down but such development is not necessarily an insurmountable obstruction to modern public transport modes.

6.73. We are encouraged by WSCC's statement that there can be a step change in bus provision. This applies equally to links into the town centre and to other parts of the town as it does to the link with Crawley. These too must be of the highest order enjoying significant priority over other traffic. We note that Metrobus, the local operator, in its submission under Issue 10 says that the relief road could improve bus operations in the East Grinstead area. Full advantage would need to be taken of any easing of traffic conditions to offer advantages to public transport. We also note that

the route of the former Three Bridges to East Grinstead railway line could provide a key link for sustainable transport modes between new development and the town.

6.74. Turning to the railways, some participants consider the line to London a poor relation that will not be able to cope with additional demands. However, we understand that it is part of the Thameslink 2000 initiative that will bring longer trains and a cross-London service, hopefully by 2008 according to Mid Sussex DC. Nothing can be certain at present regarding rail investment but development at East Grinstead will be an incentive to the train operator to provide a better service, given that track capacity appears to exist, and WSCC should do all it can to make this happen. Improved interchange at East Grinstead station, with good bus connections, will undoubtedly assist in the encouragement of rail use. We note that there are proposals to extend the Bluebell line over former tracks into East Grinstead and Crest Strategic Projects' contention that development at the southern end of the search area will facilitate this. On the face of it what is essentially a leisure railway would have no part to play in day to day transport terms but this does not have to be the case given the new railway environment. The potential for a new station off the B2110 should be investigated together with the prospect of a shuttle service into the town to link up with the London trains.

The relief road proposal

6.75. WSCC emphasises that the proposed relief road would be a low key, single carriageway road with at-grade junctions and as such it will not attract additional traffic. It maintains that the road is essential to solve existing traffic problems in East Grinstead caused by the conflict between longer distance through movement on the A22 and local cross-town movement whilst accommodating demands generated by the development. It would do so by removing the A22 traffic. It confirms that a precise route has not been identified but the road would be contained within West Sussex because of objections from East Sussex and Surrey County Councils and would link the A22 with the A264 at the Duke's Head roundabout east of Copthorne. An appendix to Barton Willmore's statement shows the proposed corridor and can be assumed to give some indication of the route which might be followed.

6.76. There are objections to the proposed relief road from a number of quarters and we will consider the nature of each in turn. Some participants question whether the road is in fact necessary, believing that promised improvements to the A22 through the town would suffice. WSCC maintains that this has been investigated but would not solve the problems. We take the view that there may be opportunities for local action in the town which could be part of an overall package.

Impact of the road to the north and south

6.77. Neighbouring authorities are worried about the road's impact on the Green Belt and settlements to the north and on the AONB to the south as a result of traffic generated or re-routed. Looking at the implications for Surrey, the road as proposed does not enter the county and this addresses a concern of both Surrey CC and Tandridge DC. As a consequence, as far as we can assess, there will be no impact on the Green Belt. There may well be some additional traffic on the A22 northwards but this will not be

influenced by the relief road in our view and might not be significant given the development's close association with Crawley/Gatwick plus an improved rail service.

6.78. There are particular concerns about the implications for Ashdown Forest, part of the AONB which Wealden DC points out is protected under a range of international, national, county and local policies. In this respect we note that the East Sussex Structure Plan contains a policy opposing any road scheme at East Grinstead which would lead to a significant increase in traffic in East Sussex. At issue is whether there will be a significant increase. Barton Willmore's modelling indicates that whilst there will be an increase in traffic levels on the A22 it will not be significant, but East Sussex CC does not accept the figures. We are not in a position to test alternative figures and assumptions behind them and would argue that the EiP and its Panel Report is not the most appropriate mechanism for doing so. We agree that long distance traffic should ideally be on the trunk road network and must ask whether this proposal is likely to attract it away. Given that the A22 south of East Grinstead can in no way be described as an express route, that a relief road will be designed so as not to attract additional through traffic, and that congestion is likely to remain a problem on the A264 east of M23 junction 10, we cannot see that the A22 will become more attractive than the M23/A23 as a route to and from the coast. No hard evidence was presented at the EiP that this will be the case.

6.79. Admittedly a relief road will have to pass through part of the AONB south of East Grinstead and this is naturally causing much consternation, particularly to the National Trust which has a landholding in the vicinity at Standen. Local groups point out that there would be a major physical impact because a road will have to climb steeply to reach the A22 presenting a scar on the landscape. Some feel that it would be better if access to the A22 were further south in East Sussex, especially since there is no easy option to provide a junction in West Sussex, but we cannot assess whether this would have less impact on the AONB. We fully understand the sensitivities surrounding these matters, and we are aware of the requirement in PPG7 (paragraph 4.8) that there has to be a demonstration of national need for development to be acceptable. We take the view in this case that if development is required to meet a strategic need identified in RPG, if a relief road is necessary to support that development and if there is no alternative route other than through the AONB, then there is a case for a road as proposed. Since we are satisfied on the questions of need we cannot support claims that impact on the AONB automatically rules a relief road out and we would support Mid Sussex DC's contention that there are exceptional circumstances. That said, the impact on the AONB of any road which might be needed must obviously be minimised and more work needs to be undertaken involving all interested parties to ascertain how this can be achieved. This should include an assessment of alternative links with the A22. We say more on this in our overall conclusions.

Impact of the road to the west

6.80. There is also criticism of the road proposals as far as their impact on the A264 and M23 junctions is concerned. There is already congestion on the A264 between the Duke's Head roundabout and the M23 and some participants, notably Copthorne

Village Association want any relief road to link directly with the motorway to avoid adding to it. We would see this as making the road more strategic in purpose and thus more attractive to potential users and we would not support it. The Highways Agency sees a significant impact on M23 junction 10 which it says would be exacerbated by the effects of development west of Crawley and at Horsham. WSCC accepts that both junction 10 and the Duke's Head roundabout would need to be modified or improved; there may well be other requirements. Barton Willmore's consultants have already identified what they consider might be required under different scenarios.

6.81. We see traffic problems beyond the western end of a relief road equally an issue as those beyond the eastern end but like WSCC we have some faith in the ability of a new public transport link to generate modal shift away from car use. The purpose of the road improvements must be to minimise the impact of the development and any associated relief road, but the crucial requirement in our view is to make public transport services immune from congestion and delay by design. That will be the greatest incentive for drivers to turn away from their cars and ease the overall situation.

Conclusions regarding the relief road

6.82. We conclude that proposals for development in this location should not fall on account of difficulties associated with the building of a relief road. There is a case for the road and every effort should be made to find an acceptable alignment and a solution to issues identified. This would include possible mitigation measures within East Sussex. Nonetheless we accept that it is not going to be an easy project to take forward because of the likely objections and we have regard to this in our conclusions about timing and capacity.

6.83. More importantly, however, we see the proposed road as one possible element in a broader package of proposals which will be needed to address the traffic problems of East Grinstead before a major development there could be commenced. As we have discussed, high quality public transport improvements, designed to make bus travel between East Grinstead and Crawley/Gatwick equally as convenient as by private car, will be an essential part of that package. Equally importantly, junction improvements and traffic management in East Grinstead will doubtless need to be developed, in part to deal with the uncertainties which have been brought to our attention about the precise amount of relief which a new road could bring to the existing problems in the town. For example, we would not regard it as a satisfactory outcome if a new road were built without any noticeable improvement to existing conditions in the town centre, perhaps as a result of currently suppressed demand emerging to fill up any extra capacity which were created, or for any other reason. Certainly a lot more work is required and this should start without delay and involve all the affected local authorities plus local interests. In effect, a multi-modal study of the East Grinstead area, and of the Crawley-East Grinstead axis is required.

Timing and capacity

Capacity

6.84. Mid Sussex DC and WSCC take the view that it is all or virtually nothing at this location. They see a development of say 1,000 dwellings as potentially disastrous since it would add to traffic problems without being able to fund a road which would offer relief. If a development of 2,500 or so is not possible then they envisage nothing more than very modest greenfield extensions and therefore see little prospect of regenerating the town. Some participants of course are arguing precisely for this because they consider major development to be misplaced. We would see small-scale development as inappropriate and a wasted opportunity in the context of the plan's strategy, and we agree that development that could not fund the necessary transport infrastructure would present real problems. We are satisfied that capacity exists along the western perimeter of the town to provide 2,500 homes. We note that developers believe that 3,000 dwellings are possible and that Mid Sussex DC also supports a greater number than proposed in the DDSP. Whether or not the larger number is desirable or feasible will depend upon the results of detailed design and impact studies. We see no need for any more than 2,500 and we would reiterate our concerns about impact on the settlement pattern along the lines discussed in paragraphs 6.68 and 6.69 above.

Timing

6.85. Having said that capacity exists for 2,500 homes, the issue is can they all be provided in the plan period? Supporters of this location believe that they can but others have grave doubts given problems associated with the relief road. We do not share the optimism expressed about delivery because we accept that the process for planning, considering and agreeing the necessary package of measures, including a possible relief road, together with land acquisition, could be protracted. However, it doesn't have to be so, especially given greater co-operation from neighbouring authorities, and it is not therefore possible to be precise over what the timing of development might be. At an average build rate of 350 per annum, which Mid Sussex says is possible based on analogy with Maidenbower, a start in 2010 would deliver 2,500 homes by the end of 2016. Mid Sussex DC says that 300 to 400 could be provided before a relief road is in place and that may well be so. In reality it might not be possible to start until 2012 which could result in a shortfall of about 750, but we just cannot say at this point in time. Another factor affecting delivery is the local plan process. Mid Sussex DC expects to adopt its local plan or LDF in 2007 and Barton Willmore anticipates development starting on site a year or so after this, notwithstanding other possible delays. We are aware that local plan timetables have a tendency to slip and so again it is difficult to reach a firm view on how development might relate to the process.

6.86. Overall there is no hard evidence pointing to a figure that might be deliverable in the plan period, though we would maintain that 2,500 is not necessarily unrealistic. Rather than make assumptions and propose firm alternative locations at this stage to accommodate a shortfall, we are minded to stick with the figure of 2,500 and to recommend that contingency provision be built into the plan with regard to this location, to be dealt with as part of the PMM process. We expand upon this in our overall conclusions.

Alternative locations

6.87. We agree with WSCC that the western side of the town is the only direction for expansion around the town. We note that the only alternative suggested close by is Worsted Farm within the AONB on the town's eastern fringe. We do not believe that development within the AONB would be appropriate given that there are unconstrained locations elsewhere, and we would have concerns about the traffic impact.

6.88. Crawley BC and others strongly believe that development should take place at Crawley rather than at East Grinstead, specifically east of Crawley close to M23 junction 10 which is seen as a much more sustainable location. Mid Sussex DC is very much opposed to this and cites a number of disadvantages. We have stated under Issue 1 our reservations about concentrating a number of simultaneous strategic scale developments at Crawley and whilst there may be longer term potential to the east of the town and elsewhere, we do not consider that there would be any balance of advantage in selecting east of Crawley instead of East Grinstead for major development in this plan period.

6.89. Similarly, though it is not close by, there are those who believe that Burgess Hill is the right location for development in Mid Sussex district, not East Grinstead, and certainly the place that any shortfall should be directed to. We do not agree. As we state under Issue 6(iv), at Burgess Hill pressures on the A23, lack of transport sustainability and major impact on the countryside and nearby settlements are key issues, and we do not consider major development there appropriate or justified. We are also mindful of East Sussex CC's concerns about the damage that associated economic development there might inflict on the coastal towns. The choice is quite clear in our minds, even with problems associated with a relief road, and we say more in our overall conclusions.

The Panel's overall conclusions

6.90. We welcome development at East Grinstead. We take the view that things have moved on since the early 1990s, particularly with the commitment to the NE sector development at Crawley, and we believe East Grinstead to be an appropriate location in the context of RPG9, especially given the opportunity for a highly sustainable and dedicated public transport link to Crawley and Gatwick. The location is relatively unconstrained and it offers local as well as strategic advantages which we see as a bonus. We therefore endorse the proposed strategic location though we wish it to be identified as 'west and south west of East Grinstead'. We consider that capacity exists for 2,500 dwellings to be accommodated and, subject to what we say below about contingency, this figure should be referred to in the EM.

6.91. There are those who say that development here should not take place because the relief road on which it is said to depend is not acceptable or deliverable. We do not share this view. We accept that there are difficulties associated with the construction of a new road because of perceptions about its wider impact and the fact that it will pass through an AONB, but we have concluded that this is an appropriate location for strategic scale development and our view is that there should be an expectation that this will be taken forward. This means finding solutions to outstanding issues relating to the traffic problems of the town. It is in any event unrealistic and unhelpful in our

opinion to take the line that East Grinstead can be offered no relief from congestion and no opportunity to grow because of the possible impact elsewhere. This is especially so because much of the non-local component of the traffic causing the congestion would appear to originate in the areas where that impact will allegedly be.

6.92. There is also the question of where development on this scale would go if there were to be no strategic location at East Grinstead. Our view, referring back to what we say in paragraphs 6.88 and 6.89, is that there is nowhere else for it to go that is more sustainable and less damaging. We certainly see no case for redirecting it to Burgess Hill as some suggest. The impact of development there would, in our opinion, be far greater and more widespread than at East Grinstead, even allowing for the construction of a relief road.

6.93. We do accept that there could be delays whilst issues relating to the traffic problems are resolved and that this could affect the numbers of dwellings deliverable in the plan period. We take the view in this case that the plan should give specific guidance on how any potential shortfall would be accommodated, given that it could be sizeable as we indicate in paragraph 6.85. In the light of our views on Burgess Hill, we propose that it should be divided between strategic locations at Crawley and Horsham and this would obviously have a bearing on the size of locations already proposed. It is a matter with which the PMM approach will need to deal and we recommend that the EM to Policy LOC1 should spell this out. Proposals for further studies that we refer to under Issues 6(i) and (ii) will assist in identifying the potential should it be required.

6.94. We are aware that paragraph 5.17 of PPG12 says that transport developments contained in plans should be firm, deliverable in the plan period and, ideally, programmed. The point has been made that this location cannot be included in the plan because the road proposal on which it is said to rely does not satisfy these requirements and therefore cannot itself be included. We believe that our recommendations help to provide a degree of certainty regarding the link between the traffic problem and the development proposal and what are the necessary next steps, and therefore that the location is able to remain in the plan together with reference to the necessary development of a package of appropriate transport proposals. We support Barton Willmore's view that this is an acceptable approach provided that a way forward from the current impasse is identified.

6.95. To find this way forward, at the EiP during Issue 10(i) on transport, we requested that the county councils, Mid Sussex DC, SEERA and GOSE collectively or individually should identify a process whereby differences of opinion might be resolved and to make this available to us after the proceedings closed. We were not seeking any further opinions about the road proposal or asking participants to agree a common line, merely seeking information about mechanisms which might enable differences to be properly addressed. As such we considered this a legitimate action that did not need the involvement of other participants. From the responses received, including a joint statement from WSCC and Mid Sussex DC, we conclude that any case for a relief road will need to be developed through the Local Transport Plan. Clearly identifiable cross boundary implications would need to be addressed by WSCC in consultation with the adjoining authorities, but if there were still disagreement on the nature of the scheme outstanding issues could be tested through the standard statutory

procedures, including a public inquiry if necessary. We believe from the responses that the parties would welcome and co-operate in further discussions and we recommend that these start forthwith to set this process in train. We reiterate the point that a key consideration here is the need to deliver the housing requirement identified in RPG9 in the most sustainable and least damaging way. This matter is not, therefore, only about East Grinstead and the impact of a relief road but about the ramifications of an alternative proposition which might reach far wider.

6.96. The SDPs relating to this location will need some modification as a result of our findings. These are set out in the recommendations which follow.

Recommendations

6.97. We make the following recommendations:

Recommendation 6.8

A strategic location at East Grinstead should be retained in the structure plan with the revised designation 'west and south west of East Grinstead'. The EM to Policy LOC 1 should continue to make reference to a figure of 2,500 dwellings to be accommodated there, should explain that any shortfall in provision due to delays will be accommodated in strategic locations adjacent to Crawley and Horsham and should include reference to the requirement for and scope of ongoing joint working with neighbouring authorities to seek a resolution of issues relating to the construction of a relief road.

Recommendation 6.9

The following changes should be made to the Strategic Development Principles added by PC/60, relating to the East Grinstead location:

(a) The first bullet point should be altered to read:
'The development should be contingent on:
(i) the provision of a comprehensive package of transport improvements which as essential requirements will
***(a)* alleviate traffic congestion in East Grinstead,**
***(b)* provide a high quality passenger transport link to Crawley/Gatwick which offers a realistic and convenient alternative to travel by private car, and**
***(c)* take full account of the traffic and environmental impacts in both the immediate and wider surrounding areas (Policies NE13 and 15);**
(ii) from the outset provision of high quality passenger transport links to the town featuring appropriate priority measures (Policy NE13);
(iii) an improved transport interchange at East Grinstead station (policy NE19).'

(b) The last bullet point should be deleted to be consistent with Recommendation 11.4

Recommendation 6.10
(ii) Add to the list in Policy NE13(b):

(iii) **'As part of a comprehensive package of transport improvements at East Grinstead, a high quality link between East Grinstead and Crawley/Gatwick'.**

(iv) **Recommendation 6.11**

(v) **Add to the list in Policy NE15(c):**

(vi) **'As part of a comprehensive package of transport improvements at East Grinstead, highways elements, including a possible relief road, which will accommodate demands generated by development at the strategic location and provide relief to congestion in the town centre whilst taking full account of the traffic and environmental impacts in both the immediate and wider surrounding areas*'.**

(vii) **Delete NE15(c)(2)(v)**

ISSUE 6(iv) WEST OF BURGESS HILL

The DDSP proposal

6.98. We examine under Issue 1 the claims that this location offers strategic advantages in terms of supporting economic growth in the Crawley/Gatwick area and spreading its benefits for economic regeneration towards the coast and we find them wanting. However, we do not dismiss the location on this account for it may have other virtues. We examine whether that is indeed the case here.

6.99. WSCC sees land to the west of the town having the best potential for development. It says other locations are constrained by the likelihood of coalescence and the sensitive landscape of Ditchling Common. In order to give the town a breathing space after recent major growth and to reflect the distance from Crawley/Gatwick, it is only proposing 500 dwellings here to be begun after 2011. To facilitate development it sees need for emphasis on public transport improvements to take pressure off the A23 but also envisages improvements to the A2300 and its junction with the A23.

6.100. Views about this location are remarkably polarised. There is much support from the local authorities, with the exception of Mid Sussex DC in whose area it lies. There is also keen developer interest, though developers generally want a much larger development and sooner and have different views about exactly where it should be. Supporters believe this to be a genuinely sustainable location because of the proximity of good road and rail transport links. Objectors, including CPRE, a number of local groups and some developers point to numerous environmental and physical constraints and they seriously question the location's transport sustainability.

6.101. Before we investigate the arguments we must stress that we are considering here the general location west of Burgess Hill as one for strategic scale development. We acknowledge that WSCC is proposing only 500 homes in the plan period but there appears to be acceptance on the part of most participants that this would, in reality, be the first phase of something much larger which would be needed to justify the required infrastructure. Supporting developers dismiss 500 homes as being unrealistic and one suggests that up to 3,500 would be possible in the long term. WSCC does not rule out further expansion and says in its supporting statement that the distribution of development in this plan period will influence the pattern of development after 2016. It also says that Burgess Hill remains its first choice to accommodate a shortfall arising elsewhere. In these circumstances we believe that it is appropriate for us to assess this location not only for the 500 dwellings proposed in the DDSP, but also on the basis of its capacity to accommodate a lot more than 500 dwellings. To do otherwise would be to create a false impression of the possible impact and implications of development.

Impact and environmental considerations

The countryside

6.102. WSCC says the countryside here is of relatively low agricultural and landscape quality but it accepts that it is valued for its views, relative quiet and biodiversity. It is clear

to us, not least from representations from the Greenfield Guardians, that it is especially precious to local people and we note that the southern part is actually promoted in the Brighton and Hove website for a country walk, being described as a delightful area filled with lush meadows and stable fields and bisected by a tiny winding stream. As we have indicated in our assessment of other areas we do not view these matters as sacrosanct given the urgent need to identify suitable sites to accommodate the housing requirement. However, Miller Hughes' statement on behalf of The West Burgess Hill Company shows a study area extending westwards from the northern end of the western distributor road almost to the A23. Certainly if there were to be development across such an area there would in our view be a major impact on the countryside and access to it because of its sheer scale and concentration. This is worrying enough but there are two other considerations which cause us concern and collectively they present a strong case against large scale development here on the grounds of countryside impact.

6.103. The first of these is the so called 'green crescent', an area of open space around the western perimeter of Burgess Hill secured when the recent expansion to the west of the town was planned. According to Mid Sussex DC its purpose, apart from recreation, is to contain and mark the limits of development. Local people, as the Greenfield Guardians and Speer Dade point out, see this as good planning and would consider it a breach of trust if it were to be lost or seriously devalued. We agree that it would put planning in a very poor light and undermine confidence in the system if after such a short period of time an undertaking given to the community were to be seemingly cast aside. Of course development would not necessarily obliterate the green crescent but if it is to be truly an urban extension there is a strong case for it to be juxtaposed with the western distributor road. However, if it were to take place to the west of the green crescent then the relationship with the town would be tenuous and development would be much more akin to a new settlement with a separate identity.

6.104. The second consideration is the visual impact of development. Views into the Low Weald are gained from the nearby South Downs; indeed one of the great attributes of the Downs is the view afforded over the adjoining countryside. Already Burgess Hill has spread westwards from its original core giving an impression of urbanisation. If it were to spread a lot further west then the perception of this area of countryside when viewed from the Downs could change significantly. This is especially so since any new development will be seen beyond the settlements on the A2116 and the whole would appear as an urban sprawl in the heart of the Sussex countryside in our opinion. At a time when the South Downs is taking on a new significance as a National Park we consider that this would be most inappropriate and unfortunate, and we take Hurstpierpoint Historical Society's point that nowhere else along the north side of the Downs is blighted in this way.

Impact on the town and nearby settlements

6.105. We have referred to the Miller Hughes study area and the likelihood of development here effectively becoming a separate settlement. Regardless of whether or not this is the case there are implications for the settlement pattern which have to be considered. We agree with those who argue that the physical form of Burgess Hill would become

distorted if development takes place beyond the western distributor road. It would lead to an uncharacteristic elongated urban form and a community here would undoubtedly be isolated from the town and its principal facilities. We say more about this below in respect of transport links. It certainly appears to fly in the face of what the DDSP says about protecting the distinct character of the county's towns and maintaining settlement patterns. We also have reservations about whether it would satisfy the concerns of PPG3 about accessibility and sustainability and in particular bring the benefits referred to in paragraph 67 of the PPG.

6.106. Before we look at the impact on other settlements we must also express our concerns about the implications for the town itself. We agree with Mid Sussex DC about the town's inability to sustain a major new extension, especially given the scale of its recent expansion. Whilst we acknowledge that development can fund infrastructure and social provision, and we note Miller Hughes' claim that it will get new retailers into the town as well, we see the need for fairly fundamental reshaping of the town centre if it is to be able to provide for the needs of a further significant population increase, albeit in a detached settlement. This would be in addition to changes that might be necessary to accommodate the transport improvements that we refer to below. This would place much stress on the town and again it would not sit happily with the plan's requirement to protect the town's distinctive character. We take Mid Sussex DC's point that if a major strategic location is developed but little change occurs in the town centre, residents will go elsewhere for their shopping and other requirements and, most likely, by car.

6.107. With regard to other settlements it is WSCC's stated aim to maintain the separate identities and character of Hurstpierpoint, Keymer and Hassocks to the south and to avoid coalescence with Sayers Common and Hickstead to the west. Nevertheless local groups are not convinced that this will be achieved and we share their doubts. Development in Miller Hughes' study area if it is taken to the western boundary will certainly threaten the identities of Sayers Common and Hickstead by bringing urbanisation so close to the A23. Perceptions here will change dramatically. There are calls for a new strategic gap to better protect these and the settlements further south. We are critical of the strategic gap concept which is the subject of DDSP Policy CH6 for reasons we set out under Issue 11. As regards coalescence we note that the policy only offers protection in the gaps that are specifically referred to and WSCC is not proposing to add to this list at least as far as this part of the county is concerned. Our proposed changes to this policy would bring that protection to all settlements and we believe that it would offer the safeguards that local groups here seek, subject to the way in which it is interpreted in the local plan.

6.108. Turning to Hurstpierpoint, the Historical Society emphasises the importance of protecting the historic setting of the village which it considers very important if the unique character here is not to be lost. We have some sympathy with this view and relate it to what we have already said about the possibility of urban sprawl in this general location. If there were to be major development here it would need to be contained well to the north of Hurstpierpoint and the adjoining settlements. This would mean locating it in the area where it will have a potentially damaging effect on Hickstead and Sayers Common. Quite clearly there are real constraints imposed by the need to protect nearby settlements and maintain the settlement pattern.

Other environmental considerations

6.109. We acknowledge that the area west of Burgess Hill is otherwise relatively unconstrained environmentally, though we note the presence of a sewage works to the south of Miller Hughes' area of search which apparently emits some very strong odours. However a number of participants, notably Christopher Maidment, have raised the issue of flooding, particularly the impact of development here further downstream on the river Adur where flooding is already a problem. The EA agrees that this is a problem and accepts that development here would require careful management but it sees no particular difficulties with a development of 500 dwellings. It concedes that 3,500 would be a far greater concern but has insufficient data at present to assess the impact. It does not rule out such a development but considers that the land take for surface water management works would be far greater than the 5% required for the smaller development. Though it has been raised we do not see this issue as one to add to the list of environmental deficiencies at Burgess Hill for we do not believe it likely to prevent development altogether, though it may have implications for its scale. Miller Hughes points out that its consultants have done a lot of work on the subject and are confident that there can be full compliance with PPG25.

Transport implications and needs

Implications for road traffic

6.110. In terms of transport a major concern we have about this location, in common with a number of participants, is its proximity to the A23 and the implications of this for traffic generation and thus sustainability. We can already imagine the developers' publicity material emphasising that it's only 15 minutes or so by road to either Crawley or Brighton. This is not the kind of advantage that we would be seeking in a strategic scale development in the context of what is said in PPG13 and the draft Regional Transport Strategy. There is already congestion on the A23, though we note the intention to carry out improvements at Handcross Hill which will ease the situation there. It is our view that a major development west of Burgess Hill would add a lot more traffic to the trunk road, especially if many of the residents will work in Crawley/Gatwick. We place some weight on Mid Sussex DC's point that it would be taking up capacity needed to nurture links between the north of the county and the coast on what is one of the key 'regional spokes' referred to in draft RTS. We agree with the conclusion reached by Speer Dade and others that the development would be largely car-reliant. We come to this view because of its relative remoteness from the railway stations and other facilities on the east side of the town, the difficulties likely to be encountered reaching them, the inability to provide much more parking at the stations and the doubts about the quality of the rail service likely to be available from the stations.

6.111. We are not convinced that a significant modal shift towards public transport will be possible here given these factors and the obvious attraction of the A23 which will be so easy to access. We discuss below particular aspects of public transport provision and conclusions reached there support this contention. The argument is put forward

by WSCC that demand management measures will restrict A23 usage. It is our view that these are likely to be much more effective in controlling local trips to town centres than longer distance trips to a wide range of destinations where parking is available. In addition the public transport alternative must be attractive and offer some advantage over the car. Motorists will continue to pay a premium for convenience and that convenience is represented west of Burgess Hill by the A23. The impact of demand management in respect of usage of the A23 by new residents here may therefore be limited.

6.112. We refer above to the difficulty of reaching the stations from the west of Burgess Hill. Mid Sussex DC points out that the east-west links to the town are generally poor and it claims that traffic generated by major development of even 500 new homes could not be accommodated in the town. It also says that the need to cross the busy A273 western distributor road will add to the problems of access. Unless fairly major improvements are made to the town's road network, which developers do not appear to be proposing, we suspect that traffic will gravitate westwards to the A23 to reach destinations elsewhere as we say in paragraph 6.106. If major works are contemplated or requested then a sizeable development will be required to fund them and this, as we discuss above, would create other problems.

6.113. We are unsure how much on-site infrastructure would be required for a development of 500 homes but we accept that the developers would fund improvements to the A2300 and its junction with the A23 if required. At the EiP WSCC was critical of the Highways Agency's attitude to possible A23 improvements that might be required. The Agency points out that the junctions on the adjacent section of the A23 are only designed to accommodate minimum level traffic movements and that any significant increase in traffic levels would potentially require the upgrading of all or part of the associated junctions. We agree with WSCC that there would have to be a commitment to such work if major development were to take place but in our view it would only serve to make the A23 even more attractive to the new residents and thus fuel unsustainability.

Bus provision

6.114. Staying with the A23, Miller Hughes and others suggest that an express bus or coach service on the trunk road could play a part in promoting public transport use, especially if a transport interchange and park and ride facility were provided close to the Hickstead junction as a kind of 'bus gateway' to the development. This is an interesting idea but we believe the possible benefits to be illusory. This type of service tends to be a last resort for those with access to a car. Destinations are limited and the vehicles are subject to frequent congestion on the road network which gives rise to unreliability. If the public transport role of the A23 is to be developed then it would have to be through something much more sophisticated, and that means expensive if a degree of segregation is to be achieved. It would also have to be a strategic system which would be beyond the capabilities of a development at Burgess Hill to fund on its own.

6.115. Much more realistic is the provision of a high quality bus service between the new development and the town and stations, something that the developers acknowledge is

needed. The difficulty here though is the ability to accommodate such a system, with the degree of priority and segregation implied, in the existing town. Mid Sussex DC says it would be physically impossible to provide continuous dedicated bus routes due to the limited road space, Miller Hughes conceded that it would be more difficult in the town to achieve segregation and WSCC admits that bus services may not be as attractive as Fastway in Crawley. Given the severe traffic congestion within the town at peak times it would appear that the bus service will not be as attractive as it would need to be to encourage people out of their cars or to provide the kind of fast link to the stations that would be required. Mid Sussex DC adds that without major remodelling of the town, involving demolition, it is very difficult to see solutions to the current congestion problem. We would add, since it is an important sustainable transport mode which the developers are promoting, that the same problems are likely to face cyclists once they reach the town, however good the facilities might be in the new housing areas.

Rail services

6.116. Supporters of the Burgess Hill location cite the existence of two railway stations within the town on the London to Brighton main line as a major advantage in terms of achieving a sustainable solution. On the face of it they would appear to have a point. However, critics point out that the service available is far from satisfactory. They say the trains that stop are the slower trains, peak hour trains fill up in Brighton so there is no capacity and facilities at the stations for interchange are very poor. They maintain that the service would simply not cope with a huge influx of new users. We acknowledge these current difficulties but WSCC tells us that things look much rosier for the future. New rolling stock is on its way, Thameslink 2000 services are promised, with longer trains, and track capacity will be increased by the Arundel chord proposal enabling some trains to run via the Arun Valley line.

6.117. This all sounds fine but what is the reality for Burgess Hill and its two stations? We do not doubt that improvements to the Brighton line will be forthcoming at some point in time and we accept that Thameslink 2000 could bring some benefits. However, action on infrastructure by GOVIA, the new franchisee, is now unlikely because it has only been awarded a seven year franchise and so hopes are pinned on the Strategic Rail Authority's ability to deliver what is required. In its statement the SRA refers to its Route Utilisation Strategy for the Brighton line which will identify infrastructure works. No timetable for this is provided but it does list a number of potential projects which would increase capacity on the line. What SRA cannot say at present is which works will be implemented in the structure plan period and how these might benefit Burgess Hill and Wivelsfield stations. We cannot be certain, therefore, that these stations will enjoy any better service than they have at present for the SRA may well conclude, for example, that the priority is express services between London and the coast. In this respect we take Mid Sussex DC's point that there are only two tracks here and allowing trains to stop effectively slows the overall provision of services.

6.118. In view of the current situation and the uncertainties about future improvements we cannot accept that the availability of the rail service provides any kind of basis for promoting strategic scale development west of Burgess Hill, especially when you add

on the difficulties of reaching the stations. We accept that a large development could fund improvements at the stations, (or at least at Burgess Hill which is not so constrained as Wivelsfield), but we suspect that new residents who choose to travel by rail are more likely to drive to Haywards Heath where more trains stop and where there is a large station car park. This, as Mid Sussex DC points out, already happens. Many more choosing this option would only add to local traffic problems.

Timing and capacity

6.119. We would accept that 500 dwellings could be accommodated west of Burgess Hill without too much impact on countryside assets or on adjoining settlements. We are uncertain, though, about what benefits a development of that size would bring, not least in terms of improved infrastructure, and we note Mid Sussex DC's concern that without improvements it would place a strain on existing facilities and services. Moreover we take the district council's point that a development of 500 homes is not in fact needed. As we say under Issue 5 there is capacity in the committed strategic location at Hayward Heath to accommodate an additional 400 dwellings and the balance could be accommodated at Burgess Hill on PDL and/or in small greenfield extensions. We therefore see no strategic purpose or advantage in a development of 500 dwellings in this location. We would add that it could well influence the location of future development and we say more about this in our overall conclusions.

6.120. Developers, as we have said, take the same view about the figure of 500 and make the case for up to 3,500 new homes here. From our assessments above we must conclude that although it might be physically possible to accommodate such a large-scale development here its impact would be unacceptable and it would not be sustainable. There are far better locations much closer to Crawley/Gatwick and since we have concluded that they offer sufficient capacity to meet the strategic housing requirement in the north east of the county we see no case for a large strategic allocation at Burgess Hill.

6.121. In reaching our conclusions about this location we have not considered in detail the contention that the town needs a breathing space following recent large-scale expansion. This is because we have identified more fundamental deficiencies which suggest that there should not be major development here. We note that some participants dismiss the notion that the town needs time to settle down but bearing in mind its size and the nature of its infrastructure, both social and physical, we think they are wrong to do so. Absorbing an extra 1,500 homes will have brought many pressures which take some time to ease and adding a whole lot more housing early in the plan period is more likely to place the town in turmoil than to keep up the momentum of economic growth, which is the developers' argument. This is another reason for rejecting early and large-scale growth.

6.122. Having rejected strategic scale development we must accept that there will still be pressures for growth which will need to be taken on board. In this respect we note that Burgess Hill is a strong employment centre with a good track record for attracting jobs (though CPRE has some reservations about this). We note also that there is a strong market for housing. We take the view that an appropriate level of sustainable growth over the plan period should be a matter for the district council to address

through the local plan. We are satisfied from what it has said that sufficient opportunities exist in PDL and small greenfield extensions to meet the town's requirements. With regard to the latter our recommended Policy LOC1 allows for small extensions to the main towns to meet local needs not otherwise met by strategic development and we recommend under Issue 5 that the figure for small greenfield provision in Mid Sussex district should be increased whilst stressing that the figure is by no means fixed.

Alternative locations

6.123. Both David Pantling and Strategic Land Investments suggest that new housing should be directed to the south of the town which WSCC rejects because of the threat of coalescence with Hurstpierpoint. David Pantling sees a different type of strategic location which also includes a significant allocation around Hurstpierpoint, Keymer and Hassocks, but in addition to the possible intrusion into and impact on the AONB WSCC points out that this does not fit well with the plan's strategy. We consider that the south has the same deficiencies as the west, particularly with regard to urban sprawl, though its impact on the settlement pattern is obviously more related to Hurstpierpoint than to Hickstead and Sayers Common. As we say in paragraph 6.108 any expansion of Burgess Hill should be kept well away from Hurstpierpoint because of its historic setting. The south may be a little less remote from the town but problems of access across the town remain and those seeking access to the A23 or Haywards Heath will add to the problems on the western distributor road.

6.124. David Pantling's ideas for the Hurstpierpoint area are more akin to the DDSP's proposals for the location west of Arun district where smaller communities would form the basis of a strategic location. The difference is that in the coastal region east of Chichester there are no better alternatives in the form of extensions to the main towns capable of accommodating the required housing. Here there is simply no need to consider locations which are not extensions to the main urban areas and we reiterate that this general location halfway between Crawley and the coast offers no strategic advantage in our view. Moreover, Mid Sussex DC raises other specific objections which we would support, including problems related to Hassocks station, all of which add to the case against this alternative approach.

6.125. Richard Maile makes the case for development at Sayers Common. This is no more than a small village off the A23 and development here would be totally out of keeping with the strategy of the plan and with PPG3. There is no railway station and as we indicate in paragraph 6.114 the notion that long distance coach services stopping here would make it sustainable is misplaced.

The Panel's overall conclusions

6.126. We conclude that there is no case for a strategic location at Burgess Hill. No strategic benefits have been proven in respect of a location midway between Crawley and the coast, there is no need to allocate 500 dwellings here and the much larger development sought by developers would have an unacceptable environmental impact whilst not being sustainable in transport terms. We have identified a formidable list of deficiencies and in our view the location has very little going for it as one for

strategic development in the context of government guidance and Regional Planning Guidance. We would add, drawing on what we say under Issue 10, that neither does it fit in with the provisions of the draft Regional Transport Strategy. Frankly we are surprised by the level of support for it that has been expressed.

6.127. We acknowledge that WSCC's approach is to develop here only at the end of the plan period and only in modest terms but, putting questions of need and impact aside, it is of concern to us that this would predetermine where future growth should go without due consideration being given to whether it was the most appropriate strategy. We say this because developers seem intent on achieving a large-scale development here and pressure to allow massive expansion would be immense. It would be much better in our view to leave strategic development at Burgess Hill out of this plan pending a comprehensive assessment for a subsequent plan of how development for both strategic and local needs might best be accommodated in this part of the county in the most sustainable way if it is needed in the future. Ideally this should be undertaken in close association with East Sussex CC whose boundary is very close to the edge of the town.

6.128. Our final comment on Burgess Hill, which stems from what we have just said and of course our views on the location's shortcomings, is that it should not be considered as a location to accommodate any shortfall arising from problems at strategic locations elsewhere in the north east of the county. We have made it quite clear that this should be contained in the wider Crawley/Gatwick area which extends between East Grinstead and Horsham and where we have indicated that growth should be concentrated.

Recommendations

6.129. We make the following recommendations:

Recommendation 6.12
West of Burgess Hill should be deleted from Policy LOC1 as a strategic location.

Recommendation 6.13
Reference to the A2300 Burgess Hill link road improvements should be deleted from Policy NE15.

Recommendation 6.14
Reference to Burgess Hill and Wivelsfield stations should be deleted from Policy NE19 unless there is a prospect of improvements to the integration of transport at those stations being accomplished other than through strategic-scale development.

CHAPTER 7

ISSUE 7 THE STRATEGIC LOCATIONS (COASTAL AREA)

Do the new strategic locations identified in Policy LOC1 (b.2.ii - south-west of Chichester City & b.3.ii - east of Chichester District/west of Arun District area) offer the best opportunities for sustainable strategic development?

Background

7.1. We have explained under Issue 6 the background to both that and the present Issues. Although they were split at the EiP, we treat the two coastal area strategic locations together here in view of the various linkages between them.

The Main Issues

7.2. As with Issue 6, the main issues for each of the locations are:

(a) What would be the impact on features of acknowledged importance and what are the environmental constraints (including the risk of flooding, and the impact on strategic gaps)?

(b) What are the transport implications and needs?

(c) What would be an appropriate timescale for development having regard to the necessary infrastructure provision and how much development could realistically be provided?

(d) Are there alternative and better locations for strategic development close by?

(i) SOUTH-WEST OF CHICHESTER CITY

The DDSP proposal

7.3 The particular advantage put forward for this location is its proximity to the city centre, the railway station and employment areas. It is sufficiently close to be connected to these facilities by cycle and footways, and in this sense is a good location for an urban extension. The main objections relate to the environmental harm that the proposal would be likely to cause.

Impact and environmental considerations

7.4. WSCC indicates that the area of search for this location could extend east of Stockbridge as well as west of it, so that it might be better described as being south and south-west of Chichester City. However, even given a wider area there would remain a long list of potential constraints on development, including the Chichester Harbour AONB, the various nature conservation designations that apply around the Harbour, a Special Area of Conservation, land subject to possible flooding, the effects on the setting of the City and in particular on views of the cathedral, the quality of agricultural land involved and the impact on nearby roads.

7.5. The barrier of the A27 has already been breached in this vicinity by development at Stockbridge, and a benefit to this wider area would follow from the road improvements which would be necessary if strategic scale development went ahead

here. WSCC argues that the constraints on this locality are no more severe than elsewhere around the periphery of Chichester, although the Chichester DC concludes from the severity of those constraints that there is no suitable location for any strategic scale development near the City.

7.6. Any major development site is likely to be subject to various constraints, but in total those affecting this location make up a particularly formidable list. Some, including the nature conservation designations and the effects on the character of the City, are of national or even international importance. Chichester Harbour is a 'European Site' as defined in the Conservation (Habitats etc) Regulations 1994. An assessment is required before consent is given for a project which would have a significant effect on such a site, and priority should be given to this if it showed that an unacceptable impact would be likely. Counsel's opinion obtained by WSCC suggests that the area could be identified as a strategic location in the structure plan without prior assessment. That would not be needed until a planning application was made. The opinion does however point out that it is open to objectors to argue that the likelihood of unacceptable effect is such that the site has no realistic prospect of coming forward.

7.7. As far as we are aware, the preliminary work done so far would not be sufficient to satisfy the requirements for an assessment under the 1994 Regulations; indeed such an assessment would be likely to take several years to undertake. WSCC makes it clear that there would be no need for the proposed development to extend directly into the designated areas, but the nature of any impact and the effectiveness of any possible mitigation remain difficult to assess at present. The greater proximity and greater amount of human activity close to the designated areas, including the proposed relief road, and any necessary flood prevention measures could all have major harmful effects. At the present time it is not possible to be sure that development could go ahead without causing unacceptable harm in terms of the 1994 Regulations.

7.8. The impact on the character of Chichester is also a matter of great importance. The town remains of a size and layout that reveal clearly its long and varied history and permit views of the cathedral spire from many directions. The retention of the character of this landscape setting is a factor that should be given great weight. English Heritage and some other participants are concerned that development beyond the A27 would be likely to cause significant harm. Whilst WSCC and Berkeley Strategic Land correctly point out that there is already development south of the A27, we accept nonetheless that the A27 remains in general both visually and functionally a southern boundary to the main built-up area. We are concerned that further substantial development could have the effect of materially increasing the harmful impact of existing development south of the A27, especially as there are no obvious visual limits to such expansion. Even if it could be mitigated effectively, the need for and effects of such mitigation would be a further significant constraint on the development of an area subject to many other constraints.

7.9. The Environment Agency has produced maps showing areas liable to flood risk. These take into account both anticipated climate change and the result of surges. They indicate that there is land which could be developed but they also substantially reduce the potential choice of site available. Depending upon the location chosen the site might require measures or works which could have harmful effects on nature conservation or visual considerations.

Transport implications and needs

7.10. The site is relatively close to major facilities and public transport connections. Even if few were to walk and only a few more cycle directly to them there still exists the potential by means of public transport links for this to be a particularly sustainable location.

7.11. At the same time, the additional traffic resulting from development in this area would add to existing traffic difficulties and environmental harm unless there had been prior improvement works. These would be likely to include improvements to junctions on the A27 and the construction of a Stockbridge Relief Road. The former, including some degree of grade separation, are needed even without the proposed development and a decision at a strategic level as to their construction is expected to be made during 2003 by the Secretary of State. This might result in their construction at some time after 2008 although at present this remains uncertain. Their location means that particular care would need to be taken over their design.

7.12. The Stockbridge Relief Road is a longstanding proposal that would be an essential prerequisite to the scheme. It would bring some improvement to communications and the environment in Stockbridge and elsewhere in the Manhood peninsula. We note, however, concern expressed by the Manhood Peninsula Partnership that any gain in accessibility could be offset by the likely harm that the development as a whole would cause to the area's environmental quality. This is of great importance in view of its dependence on tourism.

Timing and capacity

7.13. The DDSP as modifed by PC/19 suggests that this site could accommodate some 750 dwellings. Although Chichester DC points out that this is only a preliminary estimate, it does regard it as being a maximum. The proposal would be dependent on the prior completion of highway improvements including the relief road and the inclusion of a substantial proportion of affordable housing [see Issue 12]. Berkeley Strategic Land is satisfied that the proposed development would be capable of paying for its share of these and other necessary infrastructure. It is expected that the various highway improvements would be paid for from a variety of sources.

7.14. There are likely to be some uncertainties and some potentially harmful effects with any scheme of the size proposed. Until further detailed assessments have been completed the acceptability of development on the scale proposed in this general location cannot be convincingly demonstrated. The need under the 1994 Regulations for an assessment to be carried out before the eventual planning application means that this uncertainty would continue until a decision had been reached on that application. If permission were to be refused it would be so late in the period of the present plan as to make it virtually impossible to achieve the numbers of new dwellings intended. We are well aware that the more closely the area of search for a strategic location can be defined, the greater is the assistance given to district councils, potential developers and existing residents. Certainty is a desirable attribute for allocations, but we are not convinced that the case has yet been made that development at this location would be so superior to possible alternatives as to justify naming it in the structure plan.

Alternative locations

7.15. We discuss these in our overall conclusions on this Issue.

(ii) EAST OF CHICHESTER DISTRICT/WEST OF ARUN DISTRICT

The DDSP proposal

7.16. WSCC explains that although this is listed in Policy LOC1 as a single strategic location, the numbers of dwellings are given separately for each District in PC/20 (500 at Tangmere in Chichester District and 1250 in the west of Arun District). There are therefore effectively at least two areas of development. WSCC indicates that it certainly does not intend there to be a single new settlement straddling the two districts but believes that together the various sites would assist in coastal regeneration. We are however strongly of the view that the two parts of this strategic location should be treated separately as different considerations apply to each.

East of Chichester District - Tangmere

7.17. Tangmere is separate from Chichester but is nonetheless very much a satellite of the city. Development at Tangmere, especially to the west, would therefore essentially be dependent upon the facilities of the city. The proposed additional strategic gap between Tangmere and Chichester would be deleted by recommendation 11.4 but we are nonetheless concerned that the separate identity of those two settlements should be preserved. If development were to be carried out at Tangmere the need to retain a suitable separation would be a constraint, but we would doubt whether it would be a reason to rule out all development to the west of Tangmere.

7.18. Of greater concern is the lack of a station and the limited existing or potential services. A new or improved bus service could be introduced but, especially bearing in mind the very close access to the A27, it is likely that most movement to and from the new development would be by car. Our concern is that Tangmere is not sufficiently close to Chichester for development there to be regarded as a sustainable urban extension to Chichester; nor is it clear at present that sufficient opportunities exist to create sustainable transport links as to justify naming Tangmere as a location for strategic development in preference to other possible options.

7.19. We note that Tangmere was subject to very substantial expansion in the later 1980s, increasing its size by about a half. However the ten years or so since that time will have given some opportunity for the village to adjust to its new size. Provided that any further substantial new development were not to take place in the very short term this would not in itself be a material reason not to choose it as a strategic location. Its comparatively poor relationship to the facilities which residents would be likely to need in Chichester is however more serious. Development here would conform neither with the advice in PPG3 nor with the DDSP's overall strategy.

7.20. As explained earlier, it will be hard to find any location for new residential development in or around Chichester which does not have some substantial demerits. At the same time some do have substantial advantages. We therefore consider that the

proportion of the present strategic location intended to lie within Chichester District (500 dwellings) should be subject to the same recommendation as for the strategic location south-west of Chichester.

West of Arun District

General considerations

7.21. This is the one strategic location in the DDSP which is not associated with an adjoining urban area. To that extent it requires particular justification as to how it would relate to the advice in PPG3. We accept the argument that strategic scale development is required to assist in further regeneration in the Arun part of the coastal plain, and that constraints on the peripheries of Bognor Regis, Littlehampton and Arundel make undesirable any further developments there beyond existing commitments.

7.22. It is nonetheless essential that this strategic location should meet the general locational requirement of being sustainable in terms of public transport connections and not be subject to severe constraints or likely to cause material harm. WSCC indicates that although it expresses no opinion as to whether it would be better to have one or more sites, it is important that the infrastructure required for it should be co-ordinated, that it should be served by more than one transport mode, and should have good access to the A27.

7.23. The likelihood of fluvial flooding at Barnham Rife would make it hard to find an acceptable site in that area. The A29 which runs through Westergate is busy but is cut by a level crossing which is frequently closed, leading to long queues and much nuisance for those using the road and for those living in the area. The improvement of this road by the removal of the level crossing would help in the regeneration of the Bognor Regis area by making it more easily accessible. If some or all of the new development were to be located west of Westergate it could incorporate a new road bridging the railway, and possibly also a new station to improve the accessibility of the new development to public transport. We regard these as being very substantial advantages over and above the general locational acceptability of this general area for a strategic location, and therefore recommend that it should be described as being west of Barnham and that improvements to the A29 should be listed as being a possible prerequisite.

Relationship with the Arundel Bypass

7.24. The new Appendix to the structure plan in PC/60 states that development at the locations in both Arun and Chichester Districts would be contingent on the provision of an Arundel Bypass. This is a very long-standing proposal which is intended to reduce severe environmental harm in Arundel and to improve this part of the A27. Its route is now likely to be omitted from the area of the proposed South Downs National Park, although there are likely to be objections to this and to the proposal itself. Nonetheless it is supported by SEERA, WSCC, Arun DC and many others living or working in the area. The decision on the programme for its construction will lie with the Secretary of State. WSCC regards it as an essential part of improvements needed for coastal regeneration, and, indeed, considers that if it were not to be built in the period of the present plan the relevant strategic locations should not go ahead. It does

point out, however, that it is not intended that development at the latter would pay for the Bypass.

7.25. Whilst we would not wish to dissent from this general support, we are not wholly convinced that it should necessarily be regarded as a prerequisite for the present strategic location. No such requirement is listed in the Appendix in respect of the strategic location south-west of Chichester and WSCC acknowledges that the further a site is from Arundel the less is the relationship between the development and the need for the road.

7.26. We recommend under Issue 3 that the Strategic Development Principles listed in the new Appendix in PC/60 should be included in the plan, modified to explain the derivation of the various requirements in terms of the various policies of the plan. The Appendix would not itself be a policy; it would help to explain how such policies as DEV6 might apply to specific developments. On this basis, the inclusion of the Arundel Bypass as a prerequisite for development in the west of Arun district would be intended to act as a warning to potential developers of a possible requirement rather than as that requirement itself. If further analysis were to show that road traffic generated by development at the strategic location would not have a material impact on the amount of traffic using the A27 at Arundel it would be likely that the County and District Councils would agree to development starting in advance of the Bypass. Under these circumstances and in view of the importance attached to the latter and the additional harm which might otherwise be caused, we consider that the Appendix should continue to include the Arundel Bypass as a possible prerequisite for a strategic location in the west of Arun district.

Timing and capacity

7.27. As the DDSP capacity of 1250 relates to an area of search rather than to a specific site it is hard to come to a specific conclusion as how realistic it is to expect that land west of Barnham could accommodate such a development within the plan period. In view of the various constraints and prerequisites in terms of transport infrastructure we have considerable doubt as to whether such a total would be possible within the plan period, although subject to the results of further investigation it is perhaps possible that some limited additional development might be acceptable later. We therefore recommend a reduction of the stated capacity to 1000.

Alternative locations (Issue 7 generally)

7.28. There are no obvious sustainable or acceptable opportunities for peripheral development around the existing towns in Arun. An alternative site to that west of Barnham is put forward by Barton Willmore at Ford Airfield. However, despite such claimed advantages as its proximity to employment, its deliverability, the ability to extend the development to up to about 5000 dwellings and its location close to areas needing regeneration, we do not regard it as being suitable for identification as a strategic location at this time. As a whole it does not fall within the definition of PDL, it is isolated and lacking in many existing facilities, and it is not particularly well located for travel other than by car bearing in mind the distance of the site itself from Ford station and the lack of other major facilities nearby. In rejecting it at this time, however, we would wish to emphasise that it may well have long term potential

once other options have been used and that its possible merits and demerits should continue to be examined in detail.

THE PANEL'S OVERALL CONCLUSIONS

Chichester District

7.29. Chichester is the largest settlement in Chichester District. It has a railway station and network of bus routes, a buoyant town centre and other facilities and a variety of employment. As such, development here is more likely to be sustainable than it would be if spread more generally around the district. In terms of the advice in PPG3, the first choice is PDL. Table 1 of the DDSP indicates an ambitious target of 62% of new development in the district as a whole on PDL. We discuss this further under Issue 5, where we note that an urban capacity study has not yet been carried out for the district. Even if it is achieved it would still imply a large number of new dwellings on greenfield sites.

7.30. Given the pressure for development in this area together with the many constraints on it, it is unsurprising that there are no obvious opportunities for such development which would not involve some degree of harm to important considerations. The choice of site or sites will therefore necessarily depend largely on the weight attached to the various merits and demerits of each site. Some considerations are self-evidently of especial and probably conclusive importance. These might include locations in an AONB or an area of particular nature conservation value, or in an area liable to frequent flooding. The weight to be attached to other factors is however less certain. From the evidence available to us, we are concerned that too much weight may have been attached to automatic harm believed to occur from the location of a site in some part of a defined strategic gap. We consider that the primary matter of concern should be the more specific effects of a particular type and location of development on the coalescence of settlements. It may be, for instance, that there would be advantage in a site or sites to the west of the city, between it and Fishbourne, or even further west but close to one of the existing stations. Other possibilities discussed at the EiP included north-east, east and south-east of the city. The advantages claimed for these sites include such matters as minimal impact on the character or appearance of the city, good access to the city centre, employment areas or other facilities, and good or potentially good public transport connections.

7.31. We remain certain that in general strategic terms Chichester is one of the most sustainable locations for development and also that it would be possible to locate it so as to maximise its sustainable qualities, in particular in terms of accessibility other than by the private car, and to minimise the harm caused. The determination of the best way of doing this should be a matter for the local plan. It is at this level of plan making where informed and detailed decisions can be taken on the competing local merits and demerits of the various sites at which development might be possible, including the DDSP locations to the south-west of Chichester and at Tangmere. At the strategic level we are satisfied that there is both a need and scope for of the order of 1250 new dwellings to be provided in a sustainable location or locations near to Chichester. We are not persuaded by Chichester DC's argument that there is no scope for any strategic scale development adjoining or very near to Chichester City.

7.32. We can see no advantage in unnecessarily constraining the final choice by doing more than indicating the total amount of greenfield development that should be accommodated around Chichester. This will be the total of that intended in the DDSP for both of those parts of the locations in Chichester District discussed under this issue. It is probable that development at a single location would be more satisfactory as this would be most likely to facilitate the securing of any necessary additional infrastructure including public transport improvements. It is however possible that it might be split into two or more locations, some of which might include mixed uses, provided always that the proposals would be of sufficient size to generate the necessary resources to secure modern public transport links from the development(s) to the rest of the town of sufficient quality and convenience to offer a credible alternative to travel by private car. The choice is however essentially a matter for the local plan. As far as the present plan is concerned we consider that it is best to refer simply to a single strategic location 'at Chichester City' and make no further elaboration. This would be likely to need to provide for about 1250 dwellings, although the preparation of the local plan will take into account the results of the urban capacity study and also of monitoring which together will show the potential and actual take-up of PDL in the district.

7.33. All of this would impose an inevitable delay in the determination of the exact location for the development of the new strategic location. This is undesirable, but as we regard Chichester as a particularly sustainable general location and as the areas described in the DDSP are either very uncertain themselves or have significant demerits we can see no reasonable alternative to it. The urgent need for a review to the Chichester Local Plan to incorporate and flesh out the strategic intentions of the structure plan is self-evident but we make no formal recommendation on it as it is a matter for Chichester DC.

Arun District

7.34. For reasons that we have explained above, the second strategic location in the coastal area should relate only to land in Arun district and should be described as being west of Barnham and providing for about 1000 dwellings.

Recommendations

7.35. We make the following recomendations:

Recommendation 7.1
Replace in Policy LOC1 the strategic locations south-west of Chichester City and in the east of Chichester District/west of Arun District with locations 'at Chichester City' and 'in Arun District west of Barnham' with capacities of 1250 and 1000 dwellings respectively referred to in the EM.
The terms in which the Stockbridge Relief Road is referred to in NE15 will need to be reviewed as a consequence.

Recommendation 7.2

In the Strategic Development Principles with respect to east of Chichester District/west of Arun District added by PC/60 the likely requirements for the first replacement location should be as in the existing location subject to

(1) the replacement of the second bullet point with a more generalised reference to road and public transport improvements affecting links between the proposed site, the city centre and other important facilities in Chichester and to the public transport improvement being of sufficient quality to offer a credible alternative to travel by private car, and

(2) to the need for due account to be taken at the design stage of the character of existing settlements.

Recommendation 7.3

In the Strategic Development Principles with respect to east of Chichester District/west of Arun District added by PC/60 the likely requirements for the second replacement location should include improvements to the A29 (including a grade separated railway crossing), the provision of public transport to the location of sufficient quality to offer a credible alternative to travel by private car, the investigation of the feasibility of a new railway station, and the construction of the A27 Arundel Bypass.

CHAPTER 8

ISSUE 8 THE RELEASE OF HOUSING LAND

Will the Plan's stance on the release of land for housing provide for the total requirement and maintain an adequate supply?

Background

8.1. The approach of 'plan, monitor, manage' advocated in PPG3 puts considerable weight on the importance not merely of identifying a package of sites and policies which together will provide the amount, type and location of housing required, but also of having an effective mechanism to ensure that the desired aim is actually being achieved, and to make alterations if that aim is varied, for instance by changes to RPG.

8.2. In setting out the amounts of residential development for which provision should be made in each district, Policy NE1 gives for each an annual average rate which WSCC makes clear is intended to apply to the plan period as a whole. Table 2 sets out the varying rates for each district expected in each of the 3 5-year phases from 2001 to 2016. Following criticism of the ambiguous status of that table, WSCC produced a suggested re-wording of Policy NE1 in which each district is given a total number of dwellings to be provided in each phase - these are the annual rates from Table 2 multiplied by 5. In addition the reworded policy would now include a specific mention of Policy NE3 in NE1(b)(3).

8.3. As a result of criticism of Policy NE3, WSCC also produced a reworded version to deal in particular with cross-boundary working and the strategic locations. Our conclusions take these revised wordings into account along with those in the DDSP.

The main issues

8.4. The main issues as set out at the start of the EiP were:

(a) What are the implications of the provisions of Policies NE1(b.2) and NE3(a) for the effective planning of greenfield development?

(b) Is Policy NE3 in accordance with Government guidance in PPG3? Is it needed in the Structure Plan?

(c) Is the phasing of development as envisaged in Table 2 of Policy NE1 likely to be manageable and achievable by District Authorities? Should Table 2 be part of Policy NE1 or at least referred to in it?

8.5. In the following conclusions we have replaced the first two with the following which better reflect the preliminary statements by participants and the discussion at the EiP:

(a) Do Policies NE1 and NE3 give adequate advice consistent with the guidance in PPG3 as to how and when land should be released for development?

(b) Would Policy NE3 ensure the delivery of development at the strategic locations listed in Policy LOC1?

Adequacy of advice on release of land

8.6. Although Policy NE3 requires the managed release of housing land 'to maintain an adequate supply of housing land' and instructs district councils as to the need for suitable policies in local plans, it adds little guidance beyond that in PPG3. The advice in 'Planning to Deliver', one of a series of guides to best practice produced to support PPG3, is mainly aimed at the production of local plans. It explains that its main relevance to structure plans is in respect of cross-boundary issues and strategic sites. The former is an important element of managing land supply in which the structure plan can give especial assistance.

8.7. WSCC accepts this point. Its revised version of Policy NE3 states that the key purpose is to ensure the delivery of a gross annual average rate of 3,100 dwellings over the county as a whole. It is up to the district councils to make provision in their local plans which would accord with Policy NE1 and thus ensure that the countywide total would be reached. The revised policy goes on to explain that any shortfall or surplus in a district should be addressed first within that district. We strongly support this approach. Whilst the possible need for cross-boundary working should be explicitly accepted and explained, it must remain the prime responsibility of district planning authorities to produce local plans which will ensure delivery of the necessary number of dwellings.

8.8. Circumstances may however arise in which monitoring shows that this is not being achieved in a particular district and that there is a shortfall or surplus incapable of being rectified within that district. The revised Policy NE3 states that in these exceptional circumstances joint assessment by the district planning authorities would take place within the relevant sub-area. This might result in a need to bring forward an allocation identified for development in a later phase of another local plan. The policy would explain that the assessment would need to take account of the overall situation within the sub-area, offsetting any surpluses and shortfalls within the various districts. A specific example of a possible exceptional circumstance where this procedure would be required is the strategic location at East Grinstead. Under Issue 6(iii) we recommend that the EM to LOC1 relating to this proposal should explain that any shortfall in provision there would be accommodated in strategic locations adjacent to Crawley and Horsham. This recognises the special nature and importance to the Plan of the strategic locations.

8.9. As a whole, this revision greatly improves the original. Priority would still be given to the development of PDL, and the essential primacy of local plans in ensuring the delivery of the appropriate amount of new development in sustainable locations would continue to be respected. It is of course possible for joint working to occur without specific mention of it in the policy, but the new wording would emphasise its status and purpose. All of these points would help to make the structure plan more useful to its readers and set an appropriate context for local plans.

8.10. The revised policy refers to the joint working as being between the relevant district authorities, and makes no mention of WSCC. It also leaves indeterminate what the sub-areas would comprise although WSCC suggests that the EM would explain that the latter would be north-east of West Sussex and the coastal districts. In practice we would expect WSCC to be involved as strategic planning authority and in view of its role in the monitoring process. In addition and depending upon the reasons for the

particular surplus or shortfall, there may also be good reason for the participation of adjoining districts from outside the designated sub-area. These are however not matters which it is necessary or perhaps even possible to set out in detail in a structure plan policy. The EM could helpfully expand on these and any other practicalities.

8.11. Several participants express doubts as to whether district councils would be willing in practice to assist in meeting the needs of others. Given the difficulty that they all experience in finding suitable sites or ways of meeting their individual targets in a sustainable manner, it is unlikely to be an easy process. Nonetheless it should be borne in mind that the policy would be likely to result in existing allocations being brought forward or put back, or other means found to encourage the delivery of new development, rather than new allocations be made. The district which had experienced the shortfall or surplus could well expect to be able to rectify any future corresponding resulting surplus or shortfall in the district by changing its allocations.

8.12. We regard any such arrangements, as well as any concerning the proportion of development on PDL, as being a part of monitoring and managing the supply of new dwellings over the county as a whole, and can see no practical alternative as a way of ensuring delivery of the appropriate number of new dwellings in locations that are sustainable. Such questions as how to bring forward or hold back the development of small sites, especially on PDL, are best answered in the context of the local plan. Again, the inclusion of a reference in the revised policy to a possible need for joint working is essential to ensure that it is taken into account in the preparation of local plans.

8.13. The HBF drew our attention to Policy H4 of the Hampshire Structure Plan which requires reserve provision to be made in local plans. This is of considerable interest, but is in effect part of a wholly different approach to ensuring that adequate provision is made. The reserve provision in question is very large in size but is in effect a part of the overall total provision expected in regional guidance which would be held back until later in the plan period. Whatever the merits or otherwise of such an approach it could only be adopted in West Sussex by completely rewriting the structure plan. We do not regard it as being so self-evidently preferable an approach as to justify the probable long delay to the adoption of the structure plan that would be involved.

Phasing of strategic locations

8.14. The strategic locations listed in Policy LOC1 are essential building blocks for the strategy of the plan as a whole. Under Issue 3 we recommend that the inclusion of phasing for them in the structure plan be deleted and that this should instead be a matter for local plans. The lead-in period for most is likely to be long, involving considerable preliminary investment in infrastructure. As many participants point out, any uncertainty as to whether further unpredictable delays might be imposed on the release of the whole or part of the sites for development would be likely to be a substantial disincentive to the preliminary investment or even to the negotiation of options for the purchase of the sites. In this respect they are most concerned about the wording of Policy NE3 as set out in the DDSP which appears to suggest that development in strategic locations might be held back.

8.15. The revised version of Policy NE3 should therefore state explicitly that, once started, land at each strategic location should continue to be released in accordance with the

phasing agreed for that particular location and that it should not be affected by any subsequent review of the phasing of other sites. We do not, for example, consider that, once started, the phasing of land release from a strategic location should be subject to change due to a higher than expected rate of windfalls, as this could prejudice the certainty of delivery from the strategic location. We regard this as being in accordance with the advice in `Planning to Deliver' and as helping to ensure the delivery of these sites.

Table 2 and the inclusion of rates for each phase for each District

8.16. Policy NE1 in the DDSP sets out an annual average rate for the plan period as a whole for residential development in each of the districts. WSCC initially suggested at the EiP that the inclusion of figures for each phase of the plan in the policy would unnecessarily tie its hands as they might need to be reviewed in the monitoring process but its revised version of the policy does include them.

8.17. We regard this inclusion as being unnecessarily prescriptive. It would make the preparation and monitoring of local plans over-complex and set up unrealistic expectations. Although rates will vary over the plan period, any attempt to predetermine how this should be done is likely to be arbitrary, especially in the assumptions that need to be made as to how larger sites might be phased. To include the table in the EM as is done in the DDSP is unsatisfactory as it would leave its status unclear and be likely to lead to unnecessary difficulty in the production of local plans. We consider that it is preferable for the structure plan to set out a single figure for the whole plan period for each district, leaving it for local plans to translate that strategic intent into a workable reality. They will have to have regard to commitments that will be coming forward in the early years and to timing of any strategic locations which will be dictated by infrastructure provision and other considerations.

The Panel's overall conclusions

8.18. There was strong agreement at the EiP that Policy NE3 needed to be modified, although there was less agreement as to the nature of that modification. As explained above, we regard the changes put forward by WSCC in general as substantially improving it. Other participants suggested a number of further minor changes. Some, such as replacing 'regular monitoring' in (a) with 'annual monitoring' as suggested by GOSE, are small but helpful corrections to bring the policy in line with good practice. We regard others, such as the addition of the word 'available' to 'adequate supply' in (c)(2) as suggested by David Pantling, to be unnecessary. Land which is demonstrably not available should plainly not form part of an assessment of an 'adequate supply'. There is no need to add to NE3(c)(2)(iii) a reference to this being consistent with other planning policies and objectives as it will always be necessary to implement the policies of the plan as a whole, where necessary balancing gains under one against losses under another. In addition, whilst it might occasionally be necessary to delay the development of PDL it is much more likely to be desirable and in accord with the advice in PPG3 to delay that of greenfield sites.

8.19. As explained earlier, we regard the main change suggested to Policy NE1 - the inclusion of figures derived from Table 2 - as making the policy less satisfactory. Also, and for the same reasons and to prevent uncertainty over its status, Table 2 should not be included in the plan.

Recommendations

8.20. We make the following recommendations:

Recommendation 8.1

Make no modification to Policy NE1 other than the changes to the previously–developed land targets under Recommendation 5.2

Recommendation 8.2

Replace Policy NE3 with the following:-

(a) The release of housing land should be managed in order to deliver the levels of housing development in Policy NE1(a) and to give priority to the reuse of previously developed land within built-up areas. The adequacy of housing land supply will be assessed through annual monitoring against the levels of housing development in Policy NE1(a). Once started, land at each strategic location should continue to be released in accordance with the phasing programme agreed for that particular location and should not be affected by any subsequent review of the phasing of sites.

(b) The level of housing development in Policy NE1(a) should be achieved within each district to enable the delivery of an annual average rate of 3,100 homes (gross) within West Sussex. Any shortfall or surplus should be addressed within each district. In exceptional circumstances, any shortfall arising in one district should be addressed within the relevant sub-area of the County through joint assessment by the district planning authorities. This may result in the need to bring forward an allocation identified for development in a later phase of a local plan. However, such assessments will need to take account of any surplus of provision within the other districts within the sub-area which would offset the shortfall.

(c) District planning authorities will:

1. **determine the phasing of the strategic locations and other housing allocations (in whole or in part) taking into account Policy NE1(b)(2). This will include working together in relation to large sites which cross district boundaries; and**

2. **include policies in local plans to specify the phase in which housing allocations on previously developed land and greenfield sites (in whole or in part) should be developed and, taking into account the levels of development in Policy NE1(a);**

   i. **ensure that the strategic locations, once started, continue to be released in accordance with phasing and are not affected by any subsequent review of the phasing of sites;**

   ii. **bring forward an allocation identified for development in a later phase where there is an inadequate supply of housing land; and**

   iii. **delay the development of greenfield sites where there is an adequate supply of housing land.**

Recommendation 8.3

Modify the explanatory memorandum to reflect Recommendation 8.2, including an explanation that the sub-areas referred to would normally be taken as being the north-east of West Sussex and the Coastal Districts, although districts might be added to or subtracted from these areas in particular circumstances.

Recommendation 8.4

Delete Table 2.

CHAPTER 9

ISSUE 9 STRATEGIC EMPLOYMENT REQUIREMENT

Does the plan adequately provide for (i) economic growth in the north east of the county and (ii) for coastal regeneration?

Background

9.1. The employment policies of the plan are set out in NE1, 4, 5, 6 and 7. This issue also covers aspects of Policies NE17 and 18. Employment land is in addition covered by the provisions of Policy LOC1, including the requirement that priority should be given to the re-use of PDL. Policy NE1 contains the employment floorspace requirements for each district which WSCC maintains is not fixed or inflexible; Policy NE4 sets out the basis for its provision. The background to the plan's policies on employment is contained in WSCC's Employment Background Paper which was revised in July 2002, partly to set out the most recent employment forecasts undertaken by Cambridge Econometrics in the aftermath of the events of September 11th 2001. As we say in paragraph 2.27 under Issue 1, these suggest a slower rate of employment growth than the previous set of forecasts and a much closer similarity between growth on the coast and in the north east of the county.

The main issues

9.2. The main issues are as follows:

(a) Does the plan make adequate provision for new business and inward investment?

(b) Is the basis for the employment land allocation in each district sufficiently clear?

(c) Are mechanisms for the release of employment land sufficiently clear?

(d) Does the plan provide for the needs of Gatwick Airport?

(e) Should more emphasis be placed on the roles of Shoreham Airport and Harbour in coastal regeneration?

THE NORTH EAST OF THE COUNTY

Provision for new business and inward investment

9.3. WSCC points out that the aim in this part of the county is to closely relate business floorspace provision to the growth in the workforce to avoid a mismatch between jobs and workers. It focuses on encouraging high value-added, high production employment rather than on that which is labour intensive. It says Policy NE4 makes provision for a range of sites and types of sites and premises and that flexibility is built into policy to allow for particular needs to be met. It takes the view that this combination means that the proposed provision will be adequate for new business and inward investment.

9.4. However, there is a widely expressed view that the plan's provisions will not be adequate in respect of the Crawley/Gatwick area. A number of participants, notably

Crawley BC, DPDS (for Asiacom) and English Partnerships consider that there is not enough employment land concentrated to meet likely demand and that the size and quality of sites on offer will not attract the type of business that is needed. Unless this is addressed by what English Partnerships describe as a 'step change' in floorspace provision, they say the area will lose out on inward investment and will not be able to fulfil its economic role. DPDS wants 360,000 sq m rather than the 280,000 proposed for Crawley Borough in Policy NE1.

9.5. We examine under Issue 1 the contention that from a broad strategic standpoint insufficient emphasis is placed on that area. Here we are concerned specifically with economic arguments. We conclude under Issue 1 that there is indeed a case for greater emphasis being placed on Crawley/Gatwick in the context of RPG9 and we agree that the plan's employment provisions should reflect that emphasis. We note the point made by DPDS and Crawley BC that opportunities are limited on currently allocated sites and that only 68,000 sq m of Crawley's allocation will be on new sites. This they say will seriously impact on the potential to provide good quality sites and clusters that will attract research and development activity. Crawley BC maintains that this contradicts SEEDA's draft economic strategy which it says identifies Crawley as an Area of Economic Success where the aim is to improve competitiveness and skills availability. We have some sympathy with Crawley BC's position but like WSCC we are not convinced that the answer lies in an increase in the overall allocation for we remain concerned about overheating and maintaining a balance between homes and jobs. We see no firm basis in the alternative figure put forward by DPDS. Rather we are persuaded by Crawley BC's argument that there should be a redistribution of allocations within the three districts to recognise that Crawley/Gatwick is a most sustainable location for employment. This would apply particularly to that part of Horsham's allocation which is related to the west of Crawley strategic location.

9.6. This approach takes on board English Partnership's arguments that there should be a strategic employment allocation relating to Crawley/Gatwick to reflect its role and the cross boundary issues, and to achieve a 'critical mass' of development so that there is the potential to capitalise on synergies between different occupiers. We are encouraged by the fact that both Horsham and Mid Sussex DCs endorse the approach, with caveats in respect of their own needs, and note that WSCC would also support it provided that the locations relate to where people live and would assist regeneration of the coastal economy. We see no particular problems associated with relocating some employment provision outside the strategic location in which it was intended given the excellent transport links likely to be available and the fact that the alternative might offer economic advantages. We note Crawley BC's estimate that between 30-50,000sq m might be identified on PDL and greenfield sites and its view that potential exists in the strategic gap between Crawley and Gatwick airport. We would not disagree that development for employment here is a distinct possibility; not even CPRE, an ardent supporter of strategic gaps, is arguing against it. However, as BAA Gatwick points out, the outcome of consultations on the future of the airport will need to be awaited since land here might be needed for airport development.

9.7. Our recommendations under Issue 1 in respect of Policy NE7 reflect the approach we outline here. We propose that the employment allocations to the three districts should

remain as set out in the DDSP but that Policy NE1 should make it clear that an element of each relates to development supporting growth at Crawley/Gatwick and that some of this is to be provided within Crawley Borough in addition to its allocation. There will need to be discussions between the districts about the precise amount of floorspace that might be transferred to Crawley and the local plans will reflect the outcome.

9.8. With regard to the question of quality of provision we agree with Sussex Enterprise that it's not just about such matters as landscaping but more importantly about access to markets and appropriate infrastructure and about the ability of sites to host new technical applications. We share concerns that in a highly competitive market sites must be available which offer these advantages and that they must be commercially viable. We take the view that widening the choice and location of sites available through the approach set out above is the most appropriate way to increase quality provision in the Crawley/Gatwick area. We accept WSCC's point that it seeks through the policies contained in the plan quality on all sites. However, we consider that the EM to Policy NE4 could usefully expand its references to the need for employment land to be of a proper quality by giving examples of what might be expected, (though stating explicitly that it is not an exhaustive list). There could usefully be cross reference to Policy DEV1.

9.9. Sussex Enterprise makes the point that there is insufficient attention given in more general terms to attracting inward investment and to accommodating changes in the shape of the local economy. WSCC maintains that policies do encourage development of appropriate kinds but we are conscious that there is no specific reference to inward investment in Policy NE4 and we consider this an omission in view of the importance that should be placed on attracting appropriate new businesses into the county. The first sentence of Policy NE4 should be changed accordingly and there should be a related addition to the EM.

Gatwick Airport

9.10. Many of the concerns discussed above directly relate to the ability to meet needs that stem from the proximity to and potential growth of Gatwick Airport. WSCC points out that there is a strategic policy framework for the development of the airport to 2016 with one runway and two terminals which allows for a throughput of 40million passengers per annum (mppa). It says the plan allows for essential airport related commercial development to take place on the airport in accordance with the provisions of the Gatwick Airport Development Strategy. Other development is expected to take place on land outside the boundary.

9.11. There are those who are concerned that growth at the airport might fall back. They point to Cambridge Econometrics' forecast of a downward trend in air transport following the events of September 11th 2001 (App.2, WSCC/9/1/B) and to current uncertainties about where future runway capacity will be located. BAA Gatwick Airport confirmed that there have been changes, for example in the mix of passengers, and also a downturn in the value of cargo handled, but it sees no cause for any diversion away from the provisions of the plan in respect of the airport. As regards the High Court judgement that Gatwick should be included in the consultation

process, its view is that any effects will be long term should additional capacity go elsewhere. It says Gatwick's runway will be under pressure in the short term even if the increased demand referred to in the SERAS document does not materialise. Overall it is content that the plan's strategy is adequate to accommodate 40mppa and expresses the view that there would be no significant land use implications if this figure were slightly exceeded.

9.12. Given the airport authority's optimism and general support for the plan we are satisfied that subject to the changes we propose above, the plan is soundly based to meet Gatwick's needs in the plan period as a one runway two terminal airport. WSCC seems confident that in any event the government will not overturn the legal agreement preventing a second runway before 2019. We cannot comment on this but our view about the adequacy of the plan would not be affected by what happens in respect of the agreement.

9.13. We note that Crawley BC wants Policy NE17 changed to allow in exceptional circumstances some commercial development within the airport boundary if it secures significant improvements to sustainable transport. WSCC is not strongly opposing this and BAA Gatwick raises no objection in principle provided that it would have no detrimental impact on the operation of the airport. It does, however, question the commercial viability of development above the railway station. We are happy for an appropriate change to be made to Policy NE17 and this is reflected in our recommendations. We are aware that there are other suggestions for detailed changes to Policy NE17 in respect of noise contours and transport but these were not considered at the EiP and they are matters which we are content to leave to WSCC.

Basis for the employment land allocations

Methodology

9.14. WSCC explains in its background paper the derivation of the figures set out in Policy NE1 and provides further clarification in its statement. In short the basis for the NE1 provision is commitments, together with an allowance to take account of the new strategic locations and an amount to take account of development on small sites. Not everyone accepts that the methodology used is appropriate. Specific ideas for different approaches are put forward by Crawley BC, English Partnerships and FSAS. This aspect of Issue 9(i) is not strictly about methodology; it is primarily concerned with whether the basis for the employment land allocation for each district is sufficiently clear. We accept in any case that there is not a generally accepted method of planning for employment needs. That said, we take the view that the alternative approaches are worthy of some consideration to test WSCC's assumptions and to assess whether any ideas contained in them should be taken on board.

9.15. Crawley BC's points specifically concern the matter of how the employment allocations around Crawley should be handled. We have discussed this in paragraphs 9.5 to 9.7 above and consider that our recommendations will address Crawley BC's concerns. English Partnerships argue for a more sophisticated approach which

assesses a wider range of factors. WSCC maintains that there is sufficient flexibility in the system for the districts to take on board more detail, including the particular needs of the business community. We are not convinced that English Partnership's approach will necessarily be any more robust and we would support WSCC's view. In this respect, though, we take the point that there are other factors at play which need consideration and we say more about this when we talk about monitoring. One proposal from English Partnerships that we do consider worthy of inclusion in the plan is the concept of a strategic employment allocation for the Crawley/Gatwick area. We deal with this above and make an appropriate recommendation.

9.16. Though not strictly about methodology FSAS maintains that there should be less differentiation between the philosophies adopted in the north and south of the county which have had a bearing on the allocations. We agree that the bottom line is to foster economic success in both areas. We would argue that what we say about the coastal area under both Issue 1/2 and Issue 9(ii) is not out of kilter with the Federation's thinking and recognises the strengths and the needs of that area. FSAS also puts forward the view that the plan should show more concern about promoting the use of sites in towns and near public transport hubs rather than at the strategic locations. We would argue that in reality employment provision on PDL in towns is likely to be significant given the general thrust of the plan and we support this in view of sustainability advantages despite the potential consequential effect of reducing the amount of PDL available for residential development. By contrast, as we recognise under Issues 1 / 2, the strategic location element is a relatively small part of the total allocation but nevertheless of some importance in terms of relating housing and employment provision. Overall we would agree with WSCC that the balance is appropriate.

Need for greater clarity

9.17. Whilst many participants accept that the basis for the allocations is clear, some want more detail set out in the plan regarding assumptions behind them and the three northern district councils seek greater guidance on how to deliver what is required. We have already made the point that the plan should make clear how cross boundary issues at Crawley/Gatwick should be addressed. Horsham DC points to the need for more clarity on the relationship between floorspace and overall land take but considers that this might best be provided in supplementary guidance following joint discussions. We agree and would take WSCC's point that the plan should be kept as concise as possible. Horsham DC also seeks in respect of Policy NE4(b)(2)(i) further clarification as to how it will be possible to determine whether the loss of particular employment sites or premises should be resisted in terms of whether they make an important contribution to the supply of premises and jobs. We have heard nothing from any other participant on this matter and will leave it to WSCC and Horsham DC to discuss and resolve.

9.18. As regards assumptions behind the allocations we agree that there is a need for more transparency in the plan itself and in the light of what we say about methodology we believe that the EM to Policy NE1 should say something about how the allocations have been arrived at and give greater emphasis to the fact that they are not prescriptive requirements, together with the implications of this. For example, it could make clear

that whether there is a case for underprovision or overprovision will be determined by the monitoring process which should have regard to a whole range of factors as we discuss below. It would also be helpful if the components of provision were to be made clearer. Mid Sussex DC sees benefit in including Table 3 of WSCC's Employment Background Paper in the plan since it sets out the components but we are concerned that flexibility will be affected by including too many precise figures in the plan and we would prefer just a reference to it in the EM to Policy NE1.

The release of employment land

9.19. WSCC points out that the onus is on the districts to phase development and timing of the release of land in order to maintain the broad balance between people homes and jobs. It says it may be necessary to manage the release of employment land by reserving specific sites to later years of the plan period. There is no disagreement on these matters but there is a feeling amongst participants that more guidance is needed, especially having regard to the different and possibly contradicting aspects of phasing, ie to achieve balance, to meet business needs and to relate to infrastructure provision. Many participants stress the importance of monitoring, which should include an assessment of various factors, and some feel that this may be another area where the plan needs to be more explicit.

9.20. We note that phasing of the release of employment land is covered by Policy LOC1 in respect of strategic locations, Policy NE1(b)(2) and(3) and NE4. Noting the views of GOSE and Crawley BC, the first point that we would make on the matter is that there is a need to bring guidance together in one place so as to achieve a more focussed policy. This would be aided by our recommendation that the phasing element of Policy LOC1 should be removed. It is our view that the place to do this is Policy NE4 which would thus become a policy on employment provision and the release of employment land.

9.21. We agree that a monitoring requirement should be a key element of policy. In Policy NE1 as drafted reference is made to maintaining a broad balance between people homes and jobs and to the co-ordination of infrastructure but not to any other requirements. We support the view that the monitoring net should be cast wider and should take on board local economic and market conditions and the specific needs of business. The policy should recognise that there are other factors at play and require that relatively sophisticated monitoring be carried out accordingly. The EM should acknowledge that phasing is not a straightforward exercise and offer guidance on the monitoring process and on how the various factors should be balanced against each other. This is potentially a complex matter and may need to be the subject of supplementary guidance. We would add that in the light of our recommendations for the Crawley/Gatwick area phasing will be required on a joint district basis and this should be acknowledged in the EM to Policy NE4.

9.22. We are happy to leave the specific wording of policy to WSCC but we would see monitoring and release as the subject of a new part (b) to Policy NE4 with appropriate changes to part (b)(2)(ii) as currently drafted. There would also need to be a cross reference in Policy NE1(b)(2) to these new provisions.

The Panel's overall conclusions

9.23. We conclude that the plan does adequately provide for economic growth in the north east of the county in terms of the provisions that it makes but we consider that delivery could be improved in a number of ways. We favour the concept of a strategic employment allocation which would give much greater flexibility in the Crawley/Gatwick area to achieve the right kind of development in the right place in order to support RPG and SEEDA strategies and to meet the area's needs. We see the need to strengthen Policy NE7 in this respect and we recommend changes to Policy NE4 so as to cover the need for appropriate inward investment and to bring together a more comprehensive approach to monitoring and land release which recognises the difficulties in dealing with potentially conflicting aspects of phasing. We also consider that more detailed guidance and greater clarity is needed in certain areas of policy. Our recommendations on all these matters are set out below.

Recommendations

9.24. We make the following recommendations:

Recommendation 9.1
Policy NE1 should include a note to explain that an element of the employment allocations to Horsham and Mid Sussex Districts relates to development supporting growth at Crawley/Gatwick and that subject to discussions between these two district councils and Crawley Borough Council on the apportionment some of it is to be provided within Crawley Borough. The EM to the policy should make a cross reference to Policy NE7 which provides the basis for this approach.

Recommendation 9.2
The EM to Policy NE1 should briefly explain how the employment allocations are derived, including a reference to their component parts, and give greater emphasis to the fact that they are not prescriptive requirements, spelling out what this means in practice.

Recommendation 9.3
The following changes should be made to Policy NE4:
- Add to the end of the first sentence 'and appropriate new activities seeking to locate in West Sussex'.
- There should be a new part (b) which brings together the plan's stance on the release of employment land and the various considerations that need to be addressed. Policies NE1(b)(2) and (3) should be cross referenced to this new part of NE4 in respect of specific requirements relating to employment.
- Policy NE4(b) should become (c) with appropriate amendments to reflect the contents of new (b), including a requirement for the comprehensive monitoring of all relevant factors.
- The EM to the policy should
(a) give more guidance on what quality employment might comprise,

(b) acknowledge that phasing is not a straightforward exercise and offer guidance on the monitoring process and how various factors should be balanced and
(c) make reference to the fact that the phasing of land release at Crawley/Gatwick will be required on a joint basis between the three districts involved.

Recommendation 9.4
Policy NE17 should be amended so that in exceptional circumstances, commercial development should be permitted at Gatwick Airport if it secures significant improvements to sustainable transport at the airport.

COASTAL REGENERATION

Provision for new business and inward investment

9.25. WSCC points out that the plan's strategy in the coastal area is to go for a level of development higher than is suggested by projecting past trends forward so as to allow for a scale of provision which allows for a greater range of size, types and locations of sites to be provided. This it says recognises that there is a large net outflow of workers to jobs elsewhere and that sites suitable for high quality prestigious development which might help reduce that outflow are in short supply. It also accepts that whilst problems may be concentrated in the area which is designated a PAER at the eastern end of the county's coastal belt, there are pockets of deprivation to the west of this area.

9.26. Some participants argue that poor accessibility and image are prime factors affecting employment provision in the coastal region and they say the plan should do more to address these issues, for example through town centre renewal. The point is also made that since PDL will be the main source of new employment provision in Worthing and Adur districts after the first few years of the plan period, there will not be adequate provision if this fails to deliver, and in any case new sites will need to be identified if business is to be attracted into these areas. A further matter for consideration, stimulated by concerns raised about the Manhood area, is whether greater emphasis should be placed on identifying particular local economic needs and adopting strategies to tackling deprivation outside the PAER. We deal with each of these matters below.

Accessibility and image

9.27. A number of participants, notably Adur Economic Partnership (AEP), think that poor accessibility is the principal detractor in terms of the area's image. We would agree that accessibility is very important and accept that there are some local difficulties, but we note that that a number of improvements are proposed both in the structure plan and emanating from the South Coast Multi Modal Study (SCMMS). We would go along with WSCC view that the structure plan has probably gone as far as it can on

transport, notwithstanding what we say about access to Shoreham Harbour below and improvements to the A29 north of Bognor Regis under Issue 7.

9.28. Turning to the wider aspects of image, on the face of it this part of the county has much going for it environmentally, given ease of access to the Downs and the sea. However, whilst there are some attractive and desirable locations we accept that there are some poor ones too, notably some of the town centres and areas associated with a once thriving tourist industry. WSCC says the town centres are being improved through a strategic partnership with Single Regeneration Budget funding, but it would seem that a rather negative perception persists that the plan should perhaps recognise and comment on. As drafted there is only a brief policy reference in NE5(b)(5). Another aspect of image is the incidence of worn out buildings at the eastern end of the area, and as AEP says there is a need to get new businesses into them. Some of these can be adapted to suit modern requirements and technical applications if that is possible. Where they cannot then they offer scope for renewal and on both counts we are satisfied from what WSCC and others have said that mechanisms are in place to take the necessary action, even though they may need to be fine tuned.

9.29. We place some importance on these matters of image and perception but we recognise that much of the action that might be taken is outside the scope of the structure plan. As regards policy we think it would help if NE5(b)(5) were broadened to point to the need for positive and direct action on particular physical problems. We would also like to see more in the EM about action in town centres and other specific locations and how this relates to the broader regeneration picture in terms of providing the kind of environment which will be attractive to business.

Reliance on previously developed land in the eastern part of the area

9.30. WSCC points out that both Worthing and Adur districts are highly constrained physically and there is simply nowhere for new employment to go other than redevelopment sites. Enplan takes a different view and is promoting a sizeable mixed use development in part of the strategic gap between Shoreham and Lancing. Although under Issue 11 we recommend removal of strategic gaps from the plan, we have some sympathy with the WSCC and Adur DC in respect of the value of the openness in this vicinity. Although there is continuous development along the shoreline it does otherwise provide a very clear and welcome demarcation between the two settlements and would be vulnerable to anything other than very modest development. We do not therefore propose any change to the DDSP in this regard.

9.31. As the local authorities say, the answer must be to make the most of redevelopment opportunities wherever they arise using the full range of mechanisms available and setting up appropriate partnerships. We note Adur DC's confidence that regeneration will be delivered through this means and Worthing BC's faith in the flexibility of policy to recognise and respond to the changing economic situation locally. Though some cite problems bringing forward the Ropetackle site in Shoreham as evidence of the risk involved in reliance on PDL, Adur DC points out that these are now being resolved and says this site demonstrates the opportunities as well the problems. We accept that a lot of hopes are being pinned on what might happen at Shoreham Harbour and we comment on that below. We agree that there is an element of risk but

we see the local alternatives as unacceptable environmentally. In this respect we have regard to the fact that employment provision on the coast is being considered on a strategic basis and that the strategic locations, as we recognise below, represent a key element in meeting the needs, aided by improved transport links. Another aspect of the strategic approach is the drawing down of benefits from growth in the Crawley/Gatwick area, though as we say under Issue 3, this should not be seen as a substitute for local action.

Meeting economic needs

9.32. WSCC refers to pockets of deprivation in the older, more densely developed parts of the towns but accepts that there are problems in other places. It considers it unfortunate that PAER status was not given to the whole coastal strip between Shoreham and Selsey in recognition of these problems. Others, notably GOSE, offered at the EiP an explanation as to why this area was excluded and it is not a matter that we consider it appropriate to comment on. WSCC says that in percentage terms unemployment is not high but the employment available is of low quality and there is a lot of insecurity. There is general agreement that the problems faced are skills shortages, low pay (for instance in horticulture) and part time, seasonal work. We are told that those with skills tend to go outside the area to work.

9.33. Selsey Town Council and the four parish councils to the south west of Chichester raise particular concerns about the Manhood peninsular which they think is being ignored. Managed retreat to combat problems of flooding is not seen as aiding regeneration in the Town Council's view. WSCC sees the need for a community based approach to problems in this area and we would agree that there appears to be no case for singling out the Manhood area in strategic terms by including a specific vision for it in the structure plan. That is not to say that there are no issues to be resolved but we support Chichester DC's view that this should be left to the local plan in the context of the structure plan's employment and regeneration provisions.

9.34. Having referred to the problems we accept that it is not all gloom and doom economically on the coast. WSCC points to some success stories such as Rolls Royce at Westhampnett and FSAS is quite upbeat about the area's prospects generally given the latest employment forecasts, though it accepts that it will take time for strategies to work. We see the proposed strategic locations as offering real opportunities for employment in quality environments which may not always be possible in some of the established areas. In addition to realising these opportunities it is in our view a question of building on the area's strengths, notably its attractiveness as a place to live, improving its transport infrastructure and, as WSCC and others say, focussing on how a range of resources can be harnessed through partnerships and close working to tackle particular problems.

9.35. We accept that regeneration has a number of different facets and that many of them are outside the scope of the structure plan. The issues are complex and different solutions are required from place to place to tackle different problems. We agree with WSCC that there is only so much that can be done from the land use perspective but we think the plan can be improved in a modest way and we note WSCC's continued willingness to be receptive to suggestions. As regards policy we should like to see

something added to the preamble to Policy NE5(b) recognising that different types of deprivation are present and that appropriate policy responses will be needed. The EM could better explain in our view the nature of deprivation in the coastal area on the basis of what WSCC said at the EiP. It should say more about the role of partnerships and the multi-faceted approach to tackling problems so that the overall strategy is clear and it should stress the important role of the strategic locations in providing a greater range of employment opportunities.

Basis for employment allocations and mechanisms for land release

9.36. On these matters generally there are no additional points arising from the representations made by those only attending the debate on Issue 9(ii) or from the debate itself and so we have nothing to add to what we have said under Issue 9(i). There are, however, specific matters to be discussed in respect of the allocations to Arun and Chichester districts and to the Shoreham (or Upper Beeding) Cement Works.

9.37. It is noted from Table 3 of the Employment Background Paper that whilst a mixed use strategic location is proposed for Chichester district (two locations if Tangmere were to be added in line with Proposed Change PC/20) no employment allocation is made in respect of strategic locations in the district and on the face of it this is an anomaly. WSCC points out that in Chichester there is already a high level of current commitments and so no further provision is proposed. However, it says there is doubt about some sites coming forward and there may therefore be a justifiable case for the amount allowed for Arun district to be shared between the two districts to better reflect distribution of strategic housing provision locally. In the light of our recommendations under Issue 7 which clarify the distribution between the two districts WSCC may wish to firm up the employment land allocations but we are content that the final resolution of the matter can be left to the two district councils.

9.38. In respect of the Cement Works West Sussex Economic Partnership wants a timetable for its release included in the plan whilst GOSE questions whether the policy referring to it (NE6) is in fact strategic and should be in the plan at all. We note that proposals for the Cement Works are already in Horsham's local plan and that there is a planning application for it. In spite of WSCC's claim that the site is of strategic importance, it does seem to us to be a particularly site specific matter that does not readily accord with the requirement in PPG 12 paragraph 5.7 about the level of detail appropriate for structure plans. Our view is that Policy NE6 should be deleted from the plan. If there remains a need to refer to the site then this can be done in the context of coastal regeneration in the EM to Policy NE5. The timetable issue thus disappears but we would comment that even if this policy were retained in the plan we consider there to be too many imponderables to justify including a timetable for its release.

Shoreham Airport

9.39. A number of participants believe that Shoreham airport has a greater role to play in supporting the local economy and they want it developed for business aviation. They

see the need for a separate policy relating to it rather than have it associated with the very different Goodwood airfield under Policy NE18. WSCC says it recognises the current role of the airport but is aware of the environmental constraints on growth. It takes the view that any weakening of Policy NE18 to allow for further expansion beyond limits already agreed or to encompass funding by development in the strategic gap would be strongly opposed.

9.40. In support of airport growth it is pointed out that the SERAS consultation document (G0035PA) says that Shoreham and similar airports have the runway and land suitable to support commercial aviation and that they could contribute towards capacity required in the south east, albeit to a very limited extent. Those operating the airport believe that it could take pressure off Gatwick. The main environmental constraint is noise since aircraft have to fly over residential areas and the Downs, but GOSE refers to PPG13 Annex B which says that local authorities should take account of economic and social as well as environmental impacts on local and regional economies. It wants an amendment to policy to indicate that all impacts will be considered. There is also a view that noise impact here would be less than at areas around Gatwick being considered for housing.

9.41. There is a fine balance here between economic and environmental arguments. We do not place much weight on the links with SERAS; even Shoreham Airport's case is not based on this argument, but we are concerned that there is a major asset here with potential which should not be disregarded. WSCC accepts that there could be some growth provided that the types of aircraft used do not worsen the noise footprint, and the SCMMS proposes a parkway station here to facilitate movement to and from Brighton and Hove as part of an integrated transport approach. Given the obvious potential of the airport we would not rule out further growth provided that there are adequate environmental safeguards but we take WSCC's point that it should not prejudice the openness to the west of the airport.

9.42. We agree that the airport is different from the airfield at Goodwood and is of sufficient strategic importance to warrant a separate policy statement in the plan. Both Shoreham Airport and Worthing BC have put forward suggestions for its wording. We do not propose to draft such a policy statement, we will leave that to WSCC. Our recommendation below sets out the prime considerations. The local plan would need to define its boundary taking these matters into consideration. We would see this statement being a new part of Policy NE5, but with cross referencing some of the more general requirements could remain in Policy NE18 which would obviously have to be adapted to reflect the different status afforded Shoreham Airport. GOSE's point on PPG13 Annex B would need to be one of the requirements placed upon the district council.

Shoreham Harbour

9.43. There is general agreement on the economic importance of Shoreham Harbour but differing views on whether the plan adequately reflects this and the strategy for its

future. As with the airport there are calls for a separate policy on the Harbour to be included in the plan in recognition of its role. Much emphasis is given by participants to the Shoreham Maritime Vision which has been endorsed by local authorities and other partner organisations and which contains proposals for the economic and environmental regeneration of Shoreham, including the development of the Harbour for both port related and non port related uses by concentrating the former. WSCC says it is a strong advocate of the Maritime Vision but it points out that this is a long term strategy and maintains that until work on the transport study is completed it would be premature to specify the proposals for regeneration set out in the vision. Nevertheless it sees significant potential during the plan period for housing and employment development on land within the port which will ostensibly become available as a consequence of the strategy.

9.44. The Port Authority's point is that nothing will happen without transport improvements and land reclamation, the vision's two key elements. In view of the area's status within the PAER and the joint working currently being undertaken it considers there should be a commitment in the plan to deliver the vision. We agree. Given strong support for the development of port activity in various pieces of government guidance identified by the Port Authority, the structure plan says surprisingly little about the Harbour, even though the EM states that it will be given the highest priority. This should be rectified, notwithstanding the scale of the difficulties to be overcome. The current perception of some is that the constraints are such that the vision will not be realised. As drafted the structure plan does little to suggest anything different. There is the added point made by GOSE that it is not clear how much progress is being made on cross-boundary working relating to the PAER.

9.45. Though the Port Authority has a point when it says that overall road access to Shoreham Harbour is not poor as claimed in the EM, local accessibility is a particular problem since heavy vehicles serving the port have to pass through residential areas to and from the A27. It is generally agreed that transport improvements, notably a new link road between the A259 and the A270, are fundamental. We accept that much of the route of such a new link could be within the City of Brighton and Hove and that therefore it would not be appropriate to refer to any specific proposal or alignment in this structure plan, but the significance of the link and the need to find a solution to the difficulties associated with its provision should nevertheless be given some emphasis. The draft Regional Transport Strategy in paragraph 11.50 says that the regeneration package should be public transport orientated. Though the Port Authority does not think a rail link feasible, public transport access also needs to be given serious consideration in our view.

9.46. In the short term the Port Authority believes that there is some scope for growth without major road works, that is by reducing the environmental impact of harbour traffic, but it claims that such growth is being frustrated on environmental grounds. It refers to proposals put forward by Ove Arup for improvements to junctions along the A259 associated with other commercial development in the area and considers that these could benefit port traffic. Adur DC says that some development has taken place, but in view of the Port Authority's representations we remain concerned about inhibiting port growth in the short term in the light of government policy. We would wish to see greater flexibilty in terms of attitudes to appropriate port related

development and measures to reduce the environmental impact of traffic. We believe there has to be a sustainable short and medium term strategy for the port as well as the long term vision.

9.47. In this connection we note the Port Authority's concerns that Policy NE5 as drafted could prejudice the future operation of the port, which it reminds us is undertaken on a statutory basis. It believes NE5(a) contains unacceptable constraints regarding infrastructure and environmental impact which could undermine the vitality and viability of the port, and that the second sentence of NE5(b)(2) could force the closure of port facilities contrary to statute. We have some sympathy with these views. In putting forward a generic coastal regeneration policy it would seem that the implications for port development at Shoreham have not been fully taken into account. As we say below we propose a specific reference in policy and this will address concerns over NE5(b)(2). As regards NE5(a) we are not convinced that the redraft suggested by the Port Authority is the most appropriate form of words since it has to apply to many different locations and circumstances. We wish to see a change that will address the Port Authority's concerns but will leave the detailed wording to WSCC.

9.48. The Port Authority is most critical of WSCC's statement in the plan that Shoreham Harbour has possibly the largest area of unused or underused land in the county. It says this is simply not the case though it concedes that there will be vacant areas from time to time because of the changing nature of the business. In view of the nature of port activity we too see no justification for this statement. We also take the Port Authority's point that use of operational port land is protected by statute and that it would not support it being given over to other uses without alternative land coming into operational use. This brings us back to the need to make progress with implementation of the Maritime Vision. Until this is taken forward we feel that WSCC needs a more cautious approach to the likely availability of land for non port related development at Shoreham Harbour. Yes, there is potential here but much needs to be done to realise it and the plan should therefore place emphasis on facilitating the necessary action so that development sites come forward during the plan period. In the meantime the port has an ongoing role in relation to the local economy which the plan has to recognise and support.

9.49. We see the need for a very specific policy statement on Shoreham Harbour but rather than having it separate from the coastal regeneration strategy it should form part of Policy NE5 in our view. Our recommended wording is set out below. There would need to be associated changes to Policy NE5(b) to reflect this new provision and an addition to NE5(b)(4) to take on board transport infrastructure improvements. We note that the Port Authority proposes changes to paragraphs 146 and 147 of the EM. We are content to leave WSCC to determine how to respond to these in the light of our conclusions and recommendations.

The Panel's overall conclusions

9.50. As regards provision for new business and inward investment we consider that the plan's provisions are relatively robust and we would accept that in most cases it has gone as far as it can in land use terms. There are perceptions of poor accessibility and image and it is accepted that jobs available and some of the buildings to accommodate them are not of the highest quality at present. We recognise that different solutions will be required in different locations and the emphasis must be on flexibility and partnership to deliver change, together with a multi-pronged approach that encompasses various complementary strategies. We see considerable potential for achieving change in the strategic locations. We recommend some minor changes which we believe will assist in making the overall thrust of the plan clearer.

9.51. We conclude that more emphasis does need to be placed on the roles of Shoreham Airport and Harbour in coastal regeneration. Both are significant assets that we feel the plan underplays to some extent and we recommend separate and clear policy statements about both. The long term Shoreham Maritime Vision and its implementation deserves particular emphasis so that appropriate action can be expedited and its many benefits realised. In the shorter term the plan must allow the port to function and grow so that it can play its part in the local and indeed the wider economy.

Recommendations

9.52. We make the following recommendations:

Recommendation 9.5
The following changes should be made to Policy NE5:
- Part (a) should be redrafted to accord with the provisions of new part (b) set out below in respect of Shoreham Harbour.
- There should be a new part (b) worded as follows:

> **"In particular the Shoreham Maritime Vision with its two key components of land reclamation and a new link road between the A259 and A270 will be taken forward by the County Council and its partner organisations as a matter of priority. Development proposals put forward at the Harbour in the short and medium terms for both port related and other uses will be permitted provided that they are consistent with the concept of the Vision and the continued operation of the port in accordance with statute, and that they do not exacerbate traffic problems and environmental conditions in the adjoining urban areas."**

- There should be a new part (c) relating to Shoreham Airport which should make the connection between the airport and economic regeneration, allow for some development within the airport boundary relating to its operation and the limited expansion of business aviation activity, stress the transport interchange role and ensure appropriate environmental safeguards in respect of residential areas and the Downs. There should be cross reference to Policy NE18.
- Existing part (b) should become new part (d). Its preamble should be redrafted as follows:

> **'Local plans will distinguish between the variety of needs for regeneration and renewal in different areas along the coast and adopt appropriate policy responses, including policies to:' (then (1) to (5)).**

- New (d)(2) should be redrafted to relate only to Littlehampton.

- Add to new (d)(4) after north east of the county: 'and both short and long term improvements to the access to Shoreham Harbour'.
- Add to new (d)(5): 'including positive and direct action to tackle particular physical problems'.

Recommendation 9.6
Policy NE6 should be deleted.

Recommendation 9.7
Policy NE18 should be rewritten as a general aviation policy without specific reference to Shoreham Airport though with general requirements that would apply to Shoreham Airport as well as Goodwood and other possible airstrips.

Recommendation 9.8
The EM to Policy NE5 should:
- provide a better explanation of the nature of deprivation in the coastal area;
- say more about the action being taken in town centres and other specific locations to achieve physical and social regeneration,
- say more about the role of partnerships and the multi-faceted approach to tackling problems,
- stress the important role of the strategic locations in providing a greater range of employment opportunities, and
- specify what progress is being made on joint, cross-boundary working relating to the PAER.
Reference in the EM to Shoreham Harbour having possibly the largest areas of unused or underused land in the county should be deleted or replaced with a statement reflecting the reality of the situation in relation to port operations; and references to road access being poor should be explained in terms of the environmental problems which arise from current arrangements.

CHAPTER 10

ISSUE 10 TRANSPORT AND INFRASTRUCTURE

10 (i) Are the transport provisions of the plan adequate, realistic and achievable?

Background

10.1. The plan's transport policies support its other strategies and have an important bearing on them. They are set out in the needs chapter in NE12 to 20 though our concerns are not with the whole raft of transport policies but with particular aspects referred to in the questions posed under this issue and derived from the greatest concerns expressed in the original representations. We appreciate that there are suggestions for various additions and alterations to specific policies but it is not our intention to go into these in depth. Some were referred to during the course of the EiP discussion and we comment on them as appropriate. Others will need to be addressed by WSCC in the context of our recommendations. Overall WSCC's view is that the combination of strategic, local and development-led transport schemes is achievable and that, with a balance of network improvements and travel demand management, they will adequately serve both the existing and anticipated transport needs of West Sussex. We sought to test this contention at the EiP.

The main issues

10.2. The main issues selected for debate are as follows:-

(a) Is the right balance achieved between public transport improvements and road schemes?

(b) Should there be a more obvious relationship between the plan's policies and the Local Transport Plan?

(c) What are the implications for the strategic transport network of the concentration of development in the north east of the county?

(d) How might the plan's transport proposals, and their relationship to the strategic locations be influenced by the draft Regional Transport Strategy and South Coast Multi-Modal Study (SCMMS)?

Balance between public transport and road schemes

10.3. WSCC's stance is that recognition must be given to the fact that major investment in public transport will not deal with all latent demand for travel and so road investment is required, though coupled with levies on car use and the promotion of changes in attitude and behaviour towards travel. It believes that the package in the plan represents a balanced and responsible attitude to transport investment which targets areas of transport need and allows users to make informed choices about travel mode.

10.4. A number of participants on the other hand, notably the CPRE, think the balance is wrong and that there is insufficient emphasis on public transport and more sustainable modes generally, and on matters such as green transport plans and traffic reduction. Some see the need for a wider network approach to public transport, especially around

the strategic locations. To illustrate their concerns they point to the fact that there is only one new public transport initiative, Fastway, in the north east of the county where new development is to be concentrated, and to the proposed west of Crawley relief road as a discredited 1980s solution to tackling transport needs. In short they do not believe the plan is radical enough when it comes to transport.

10.5. We agree with WSCC and SEERA that some road building is necessary, especially where it affords environmental relief, and we acknowledge that it should not merely be a last resort as CPRE would wish. We deal with the specific matter of the west of Crawley relief road under Issue 6(i). We also take WSCC's point that much is happening on the public transport front that is not directly referred to in the plan and indeed should not be since there are no land use planning implications. As an example it cites 'DORIS', a rural *dial a ride* bus initiative which it claims has been a success. It maintains that there is a package and network approach which lies behind and supports the plan's provisions. However, whilst there may be balance as WSCC claims, the perception is different and this is something that the plan needs to address in our view so that the philosophy as expressed in the last target on page 23 of the DDSP is better reflected in policy. In particular we agree with those who say that the plan's overall approach to transport is not clearly set out. We feel that this is partly responsible for the perception of a lack of balance.

Policy changes

10.6. In this connection there are calls for some kind of overarching transport policy which would provide a clear context for the more specific transport proposals. We accept that Policy DEV4 addresses modal choice but it does not deal with the question of balance, it is remote from the other transport policies and it is written in negative rather than promotional terms. Both SEERA and GOSE supported at the EiP an overall policy statement and WSCC conceded that it might have value provided that it does not duplicate or conflict with other statements. Our view is that there should be a new overarching policy before Policy NE12 explaining what the structure plan is seeking to achieve in transport terms, incorporating a balanced, holistic approach, but placing strong emphasis on sustainable modes in accordance with PPG13, RPG 9 and the draft Regional Transport Strategy (RTS). We say more below on how references to other transport initiatives should relate to this policy but would make the point here that the EM supporting this new policy should make reference to the network approach to public transport, especially in the areas surrounding the strategic locations.

10.7. Returning specifically to public transport, notwithstanding what WSCC says about initiatives that should not be in the plan and about schemes still being worked up, we believe that Policy NE13 could include more public transport proposals that do have a legitimate place in policy. At present it compares unfavourably with Policy NE15 which contains a long list of road projects and this too is unhelpful in persuading people that there is balance in the plan. The list should include, separately from the Fastway bus system at Crawley, a generic reference to high quality public transport proposals linking strategic locations into their adjoining urban areas. It should also make reference to public transport improvements on the Gatwick/Brighton corridor and, following our recommendations under Issue 6, to a high quality public transport link between East Grinstead and Crawley/Gatwick. There may be other appropriate

schemes that WSCC can identify, for example from its ten Urban Transport Plans. We also consider that there should be a stronger statement of intent in the preamble to the schemes in Policy NE13. Wording along the lines of 'These schemes will be expected to be brought forward, where appropriate in association with the strategic development proposals' would give greater comparability and consistency with the wording of Policy NE15.

10.8. With regard to Policy DEV4 we believe that it should be retained but its wording may need to be adjusted to reflect and amplify the new overarching policy that we refer to above. We consider that it should be made more positive by actually requiring development to contribute towards a shift towards more sustainable modes. In the light of what we say under the RTS and SCMMS heading below it should also give a very strong pointer to the fact that the strategic locations must be planned around high quality public transport systems, with a cross reference to Policy NE13. Likewise we consider that Policy NE12 could be improved so as to give more positive encouragement to infrastructure provision which favours walking and cycling. It would all help to show that the plan means business when it comes to sustainable transport.

10.9. We would make this additional point about the Fastway proposal. We note Crawley BC's concerns that the structure plan should not refer to the details of specific schemes such as Fastway for new locations where design work has not yet been undertaken. We acknowledge that work has not been done on how a scheme with the specific design parameters of Fastway might meet inter-town needs and we therefore consider that references to high quality public transport links should be made in more general terms, other than in the context of movement within the wider Crawley urban area. This is reflected in what we say above about an expanded Policy NE13.

Relationship between the Structure Plan and Local Transport Plan

Clarifying the relationship

10.10. Associated with calls for an overarching transport policy, many feel that opportunity should be taken to make it clearer how the DDSP relates to the Local Transport Plan (LTP), for example by including a summary of the objectives and strategy of the LTP. WSCC explains in its statement that the LTP, which covers only 5 years, should contain overall transport objectives and details of area based and behavioural strategies to deliver them. It says the Structure Plan should reflect and amplify them in relation to major development proposals. It considers that the necessary links between the two are in place and that a strong relationship exists between them. However, notwithstanding the need to keep the plan as concise as possible, it is prepared to include in the Structure Plan a summary of the LTP which will also make reference to the need for an ongoing review and rolling programme of schemes, priorities and funding to deliver LTP objectives and to facilitate proposed development. It also proposes to add an explanation about the future consideration of demand management measures coupled with a more comprehensive use of effective public transport measures. WSCC subsequently proposed that the plan should include a statement that major County Council transport infrastructure proposals should be

confirmed through the LTP process, however funded, and that the process must include consideration of any cross-boundary issues.

10.11. PPG12 requires that the overall planning and transport strategies are consistent in terms of objectives and integrated with one another. In this respect we welcome the clarification that the WSCC's proposed additions will provide, especially given the numerous references by participants to the contribution of related transport initiatives and the importance that is seemingly to be placed on demand management as a tool to curb the use of cars and reduce traffic levels. It will give a clearer understanding of the package approach that WSCC is promoting and which the draft RTS seeks, and as SEERA points out it will demonstrate how the LTP helps to enable the spatial strategy to come forward. The DDSP has no obvious place to locate such a clarification but this would be rectified by the addition of an overarching transport policy as we propose above. It is our view that the clarifying statements which WSCC wishes to include should form part of the EM to this new policy so that a fully co-ordinated and integrated approach to transport is set out in one place.

10.12. We note that WSCC received during the EiP the settlement letter regarding WSCC's LTP and that the programme for the next financial year includes a 7.5% increase in funding for integrated transport; WSCC's balanced approach referred to above.

Level of detail in policy

10.13. There is a view that the DDSP overlaps into LTP territory by being overly prescriptive in Policies NE15 and 19 about some schemes, especially those in the strategic locations, though there are some who would like to see more detail in policy. We are satisfied that the level of detail is about right, a view expressed by GOSE. We agree with WSCC and others that in the context of PPG12, paragraph 5.6, it would be inappropriate to include proposals concerning service delivery and revenue investment. These are best left to the EM to the new overarching transport policy as described above. We do not agree, though, with those who say that the specifics should be left entirely to the LTP, which they claim is the right place for detail. There is a clear role, in accordance with PPG12, paragraph 5.5, for transport proposals to be contained in the Structure Plan where they relate to and support a strategic approach.

10.14. A particular point made, notably by Crawley BC and Horsham DC, is that it is premature to specify certain schemes until it is certain that they are what is needed in relation to the respective strategic location. We take this point. It is all the more important in view of our recommendations in relation to the strategic locations. Certainly some specific proposals need to be removed from Policies NE15 and 19 in the light of those recommendations and these have been referred to where we discuss the individual strategic locations. In some cases precise descriptions of projects will need to be replaced with a more general description and there will be need for cross referencing and consistency with the Strategic Development Principles (see paragraphs 3.11-3.12). Other changes to specific proposals are dealt with under the heading RTS and SCMMS. Our general recommendations on the content of Policies NE13 and NE15 are set out below. Recommendations in relation to these policies and to NE19 which relate to the strategic locations are to be found under the relevant location heading.

Impact of development in the north east of the county on the strategic transport network

10.15. A concentration of development is proposed in the north east of the county and whilst this accords with RPG9 some participants, notably East Sussex CC, are concerned about the impact on movement, particularly along the corridor between Gatwick and the coast which is as important an artery to East Sussex as it is to West Sussex. The lack of an overview on the tackling of increased transport pressures is cited, having regard to the likely cumulative impact of development. The absence of any innovative public transport schemes apart from Fastway in Crawley adds to the concern, as does the lack of any firm proposals that might make up the improvements to transport in the above mentioned corridor which WSCC refers to and everyone sees as vital. We have referred under Issue 1 to the related concern that development in the corridor will exacerbate the problems rather than help to ease them. Some remain of the view that development in the corridor should fund the improved transport infrastructure needed there. We say more about this in the next section in the context of draft RTS.

10.16. WSCC considers the various concerns to be unfounded because its critics have failed to take into consideration the package approach which has been adopted, including proposals that are not matters for the Structure Plan such as its overall rail, bus and road based strategy together with demand management measures which will have an impact before the end of the Structure Plan period. It maintains that the existence of better transport provision and fewer network deficiencies in the north east should lessen the impact of development and it points out that the strategic locations will be designed to minimise long distance trips and trips by car. The specific improvements associated with the strategic locations are also an important part of the package.

10.17. Another consideration here is the study required by RPG9 of how the coastal area may benefit from economic growth in the Crawley/Gatwick area. This was dealt with in more detail under Issue 1. SEERA points out that the outputs from this will have a bearing on transport investment in the corridor and will be brought into the LTP bidding process, though we accept the point that the Structure Plan should not be silent on the matter because of the ongoing nature of this study. We certainly support East Sussex CC's view that good accessibility between the two areas, not compromised by further pressures on highway and rail capacity, is crucial in this respect. SEERA also indicated that its discussions with the SRA regarding congestion on the rail network led to the belief that the Brighton line will be an early candidate for action. This may be so, though we cannot reach any firm conclusions about the timing and nature of rail investment from our reading of the SRA's submitted statement.

10.18. Overall, given what WSCC has said about its multi-faceted approach to this matter and about its approach to development at the strategic locations, we are satisfied that the strategic transport impact of development in the north east of the county can be accommodated satisfactorily, but this comes with strong caveats. Firstly, the package approach has to be delivered and made to work effectively, and firm commitments will be needed from WSCC and its partners in this respect. In particular demand management elements, yet to be developed, will have a key role. Secondly, the provision of high quality public transport to serve the strategic locations will be

essential, together with measures to maximise the use of other sustainable transport modes (see paragraph 10.24. below). Thirdly, it is dependent on minimising the amount of traffic from new development which is likely to be directly attracted to the A23. In reaching this view, but subject to the same caveats, we have had regard to WSCC's forecasts that traffic growth stemming from development at the strategic locations (as it has proposed them) will form only a small part of overall traffic growth in the county by virtue of the principles upon which those areas will be developed. (Appendix 2, WSCC Background Paper - Delivering the Strategy, revised September 2002)

10.19. There is much overlap here with what is discussed in the next section. Indeed at the EiP this matter and the implications of draft RTS were considered together for that reason. We would say at this point that the concerns outlined above and our response to them reinforce our view, as already expressed under Issue 1, that a strategic location adjacent to the A23 midway between Crawley and the coast should be resisted. We develop our thinking on this in the next section.

Draft Regional Transport Strategy and South Coast Multi-Modal Study

Draft RTS

10.20. Draft RTS, 'From Crisis to Cutting Edge', was published by SEERA in June 2002 and has been subject to a period of public consultation. We acknowledge that being in draft form it cannot be afforded the same weight as a finally agreed document. Nevertheless SEERA points out that RPG9 provides a very strong foundation for the draft and GOSE considers that it can be given due consideration since it is so firmly based on RPG. In these circumstances we give some weight to the draft as an indication of the probable direction of more detailed transport policies for the region.

10.21. In respect of the matters covered by the DDSP two clear messages emanate from draft RTS. The first is the emphasis in transport terms on the Gatwick/Brighton corridor and on the coastal strip, in other words the inverted 'T' shape shown on Map 2.1 as one of the sub regional priority areas. The second is the emphasis on transport integration and achieving a major shift from car use to sustainable transport modes. It is important to look at the plan's policies and proposals, particularly proposals for the strategic locations in the context of these two priorities. SEERA endorsed at the EiP this interpretation of the emphasis in draft RTS. It drew attention to the twin track investment / management approach in the draft and to the hub and spoke philosophy, Crawley being one of the regional hubs which are a focus for integrated transport, and the Crawley to Brighton road and rail corridor being a spoke that requires multi-modal investment in order to rebalance the structure and use of the transport system in favour of alternatives to the private car.

10.22. Most participants agree with WSCC that the DDSP's provisions relate well to draft RTS. We believe that with the changes we recommend in order to clarify the general thrust of policy and the relationship with other initiatives, the two will complement each other in general policy terms. That said, there are different interpretations of what draft RTS means in terms of strategic development locations along the lines discussed under Issue 1. In that respect we need to carefully consider the implications

for the Structure Plan of the two strategies outlined above. On the face of it there could be conflict in seeking to address both. Much needed investment in transport infrastructure could, in theory at least, be funded by major development in the corridor, and as we have seen this is a case argued by some participants, notably Horsham DC. However, proximity of major new development to the A23 could lead to an over-reliance on the private car, in spite of public transport initiatives. On the other hand strategic development at locations away from the corridor, nearer to Crawley/Gatwick, will not fund the required investment in the corridor itself but could well deliver a modal transfer if served by quality public transport which provides greater convenience and accessibility than the local road network.

10.23. It is for the Structure Plan to indicate where the balance should lie. SEERA's view is that emphasis should be given to those strategic locations most likely to support a major shift to sustainable modes, and it also places emphasis on self sufficiency, that is a reduction in the need for longer distance movement. These two factors provide the key to locations sustainable in transport terms and in our view they clearly point away from a new strategic location in central Sussex next to the A23 corridor. We do not share the view that large numbers of people will choose to use public transport even if there is easy access to the A23, especially if stations are difficult to reach from new development, train operators continue to give priority to express services and there is reliance on jobs some distance away. Development which cannot otherwise be justified is not the way to fund the radical infrastructure improvements required, and we agree with Mid Sussex DC that there must be some doubt about its ability to do so, especially if it is actually adding to the pressures. We believe that the package of strategic locations that we have recommended under Issues 6 and 7 meet the sustainability requirements most readily. We give more detailed reasoning when discussing the particular locations.

10.24. We should point out that we do not hang sustainable transport entirely on draft RTS but we are using the emphasis in draft RTS to reinforce our strongly held view about its role and importance in achieving a satisfactory pattern of development. Given that emphasis, it is necessary to more fully understand what is required to achieve a major shift to sustainable modes of transport in respect of new development. It is not sufficient for developers to say a regular bus service will be provided between development areas and the town centre and employment areas in the hope or expectation that it might be used as an alternative to the private car, or that there is access to an existing or new station if the train operator is unwilling to provide a frequent service. Public transport provision has to be of the highest quality and fit for the 21st Century. This means development being planned around public transport with dedicated routes for buses so that they have a clear advantage over the private car, and it means, wherever possible, easy access on foot or by bus to a rail station where there is an attractive service, ideally a minimum 20 minute frequency. Dwellings should be no more than 400 metres from a station or quality bus route, reflecting the target contained in the DDSP (but not referred to in policy). The EM to Policy DEV 4 should be expanded to include these requirements and Policy DEV6(b)(2)(vii) needs to be strengthened to fully reflect the emphasis which is to be placed on sustainable transport modes. Ease of movement on foot and by bicycle is also very important and we accept that Policies NE12, DEV1, DEV4 and DEV6 already reflect this. The new

overarching policy and the strengthening of Policy NE12 will serve to give weight to the concept.

10.25. We do not accept WSCC's contention that the sequential approach in PPG3 is a constraint to the achievement of modal transfer. Given the kind of emphasis on sustainable modes that we envisage, coupled with the fact that 57% of development (WSCC figure) will be in urban areas where access to public transport and opportunities for walking are generally good, we consider that the spirit of draft RTS with regard to sustainable transport will be adequately reflected in the plan's development proposals. However, we feel that the plan needs to be more transparent in terms of sustainability requirements at the strategic locations and we recommend that the appendix that we refer to under Issue 3 (see paragraph 3.8 and recommendation 3.2) should include clear references to how sustainable transport objectives are to be met at each location. In this regard it should show a matrix with qualitative comments, not an arbitrary scoring system.

10.26. One further point in respect of draft RTS is parking. SEERA has some concern about the DDSP failing to comply with the requirement of RPG9 to include clear guidance on maximum parking standards for B1 land use within a certain size range. It had objected to the plan on this basis. Parking is not a matter chosen for examination but we understand the significance of parking policy as a tool to reduce travel by car. WSCC acknowledged at the EiP that the plan could be clearer in this area and indicated that as a result of work with the districts a set of standards fully compliant with PPGs3 and 13 should be approved early in 2003. In the circumstances we are happy to leave this matter to WSCC.

South Coast Multi-Modal Study

10.27. The final report of the SCMMS undertaken by Halcrow was published in August 2002. It contains a number of recommendations, both road and public transport, for the coastal area of West Sussex. As with draft RTS, most participants agree with WSCC's view that the DDSP has a high degree of concurrence with its provisions. Indeed WSCC points out that its input to the study (and to the development of draft RTS) has had an influence in highlighting existing and future transport problems and where the potential for growth might exist. As a consequence WSCC's position is that there are no particular issues coming out of the strategy that the DDSP has not addressed, though it is concerned with the proposed national park boundary definition and how it would impact on some of the south coast transport proposals around Worthing and Lancing. This particular matter is outside the scope of the EiP and we leave it to WSCC and the Countryside Agency to resolve.

10.28. Though participants are generally happy about the relationship between the DDSP and the SCMMS, there are some concerns which were discussed at the EiP. The first relates to the phasing of transport proposals with development and the associated desire that programmes for schemes be included in the Structure Plan. We agree with WSCC that since timetables tend to change, the Structure Plan could be undermined if proposals become out of synch. Whilst we take the view that every effort must be made to properly relate development with transport infrastructure improvements, we

support the WSCC view that it would not be appropriate to include detailed programmes for transport schemes in the plan unless they are firmly fixed.

10.29. Secondly, it has been suggested that the plan should include those SCMMS schemes that are not currently referred to in the deposit draft. Again we support WSCC's position, which is that it would be premature to do so, though we accept that some minor changes might be appropriate. With regard to a DDSP proposal within the study that has not been endorsed by the SCMMS, namely a parkway station at Bognor Regis (Policy NE19(b)(1)), we note WSCC's response that the omission has no major implication and will be taken forward separately. Arun DC points out that provision for the station has been made in the local plan. We would add our support to this proposal which we see as an important element in the development of the strategic location to the north of Bognor Regis.

10.30. Thirdly, Adur Economic Partnership and SALC express concern over the traffic and movement problems caused by the numerous level crossings on the south coast rail line which they say will only get worse with the combination of strategic scale development at various locations and increased train frequencies. Having experienced the delays at the busy Woodgate crossing on the A29 we are somewhat surprised that this matter has not been afforded attention in either the DDSP or SCMMS. WSCC stated at the EiP that it shares these concerns and that they were made known in its input to the SCMMS. We deal specifically with the Woodgate crossing under Issue 7(ii), (see paragraph 7.23), though we make no recommendation that a firm proposal be added to Policy NE15. In general terms we consider that a paragraph needs to be added to the explanatory text related to Policy NE15 in order to register concern about this constraint to movement and the need to take action where appropriate and where opportunities arise. This will provide the context for any proposal subsequently put forward for the Woodgate crossing or any other where there are serious traffic issues. We agree with CPRE that this is a road and not a rail problem and, like WSCC, we would not wish to see any diluting of proposals for improving the south coast rail service because of it.

10.31. Picking up some other points raised, we are satisfied that the plan, through paragraph 28 and the key diagram, pays sufficient regard to the role of the transport network outside the county (FSAS's point). We share SALC's concerns about the likely limitations of improvements to the south coast rail line but feel that the plan's proposals go as far as they can in recognising the line's role and future importance until the various SCMMS recommendations relating to the line are firmed up. With regard to the A27 and related road improvements at Chichester raised by CPRE we see no need to say more than we have under Issue 7 where we discuss the implications of strategic development at Chichester. Overall on the various concerns raised, we see no need for changes to the DDSP in respect of the SCMMS apart from what we say about level crossings in paragraph 10.30 and the possible need to update any general references to the study and its publication.

The Panel's overall conclusions

10.32. In answering the general question posed under this sub issue, we feel the transport provisions of the plan are adequate provided that the intended balance between public

transport and road schemes is clarified in policy, that Policy NE13 more satisfactorily reflects the public transport schemes that are required to come forward, that the role and contribution of other transport initiatives in the package approach are set out in the EM and that sufficient emphasis is given to high quality public transport provision in the strategic locations.

10.33. We feel that the provisions are realistic in that they generally accord with draft RTS and the recommendations of the SCMMS. However, we see the need for some changes to the specific proposals to bring them into line with our recommendations for the strategic locations.

10.34. As to whether the provisions are achievable, we are satisfied that if the strategic locations can be delivered then so can the transport improvements associated with them. Similarly we have every expectation that road schemes recommended under the SCMMS will be funded and constructed given the government's commitment to this approach. If there is an area of doubt it must be in relation to promised rail schemes given the ever changing nature of the rail industry's organisation and funding. Certainly where improvements can be identified and secured through appropriate development they must be rigorously pursued. We can only hope that the more ambitious improvements in quality envisaged by the industry will materialise for they are, without doubt, long overdue. New rolling stock may well be on its way but much more needs to be done to create a 21st Century railway in this corner of the country.

Issue 10(i) Recommendations

10.35. We make the following recommendations:

Recommendation 10.1
A new overarching policy on transport should be incorporated before Policy NE12 to set out the overall philosophy, including clarification of the balance sought between road building and public transport improvements and the strong emphasis to be given to the development of sustainable transport.

Recommendation 10.2
The EM to the new policy referred to in Recommendation 10.1 should explain and clarify the relationship between the Structure Plan and the Local Transport Plan, and the co-ordinated and integrated package approach to transport improvements, including the future consideration of demand management measures.

Recommendation 10.3
Policy NE12 should to be made more positive and encouraging in respect of infrastructure provision which favours walking and cycling.

Recommendation 10.4
Policy NE13 should incorporate a stronger statement of intent in the preamble line with the last sentence of paragraph 10.7 of our report, together with additions to the list of schemes under (b) to include:-

(5) high quality public transport proposals linking strategic locations with their adjoining urban areas;

(6) public transport improvements in the Gatwick to Brighton corridor;

Other schemes to be added by WSCC if appropriate. (See also recommendations under Issues 6 and 7.)

Recommendation 10.5
The EM to Policy NE15 should make reference to the impact of level crossings on movement across the south coast rail line, giving a commitment to take steps to improve the situation where appropriate and where opportunities arise.
(See also recommendations under Issues 6 and 7.)

Recommendation 10.6
Policy DEV4 should be made more positive by requiring development where appropriate to contribute towards a shift to more sustainable modes. The EM to the policy should be expanded to include specific guidance on the relationship between development and sustainable transport provision in line with paragraph 24 of our report.

Recommendation 10.7
Policy DEV6(b)(2)(vii) should be re-drafted as follows:
"include high quality transport networks for walking, cycling, and passenger transport which fully integrate with each other and with existing and potential provision, provide for easy access between new residential areas and the town centres and employment areas, and between built-up areas and the countryside, and offer an attractive alternative to the private car."

10(ii) Are the infrastructure provisions of the plan adequate, realistic and achievable?

Background

10.36. Various respondents to the consultation on the DDSP questioned the ability of the county's wider physical and social infrastructure to absorb the level of development envisaged in the plan. We are talking here about water supply, sewage treatment, health provision, policing and like matters, not generally the kinds of things that planning agreements would cover, though arguably all related to needs stemming directly from development. Infrastructure requirements are the subject of policy DEV3, though other policies touch upon matters covered by this policy. The policy contains a reference to new development accommodating existing needs wherever possible, and this additionally has given rise to a number of objections since it appears to be contrary to Circular 1/97 on planning obligations. It is with these two matters that this sub issue is concerned.

The main issues

10.37. The main issues for consideration are:

(a) How should the broader infrastructure requirements arising from development be satisfied?
(b) To what extent, if any, should development be expected to accommodate existing needs?

Broad infrastructure requirements

10.38. WSCC explains in its statement that development should provide for the needs that it generates, the implication being that conditions for existing residents should not be worsened by development. However, it goes on to say that it cannot require the wider provision that we are concerned with here. The structure plan process, through its consultation mechanisms, merely gives an opportunity to service providers to influence the location of development and enables them to plan ahead and to ensure that broader infrastructure requirements can be met at the right place and at the right time. It says that providers have confirmed that new or improved infrastructure to serve new developments can be incorporated into budgets and business plans and that it is therefore possible to meet needs arising from the development strategy. Doubts about this are expressed by some participants and these are discussed below.

Consultation and co-ordination

10.39. Since the water companies seem to be pointing in their statements to possible delays due to high infrastructure costs in some locations, and associated long lead in times for the necessary provision, there is scepticism in some quarters about WSCC's confident statement. Nonetheless WSCC remains adamant that through its consultation and co-ordination arrangements the infrastructure will be in place, and it gave an assurance that if infrastructure requirements were not met development would not go ahead. Indeed, it has indicated in its statement that it would be willing to delete the words 'where possible' from Policy DEV3 (b)(i) so as to make this clear. We are happy with this change. The water companies were more positive at the EiP and endorsed WSCC's position. The EA accepted that the south east of England is under pressure as far as water supplies are concerned but referred to its 'Water Resources for the Future' strategy for the south east (Sussex, Kent and Hampshire) and considered that there would be no problems provided that areas for development are clearly identified in the structure plan. As far as possible we have taken this on board in our deliberations under Issue 3 and our recommendations under issues 6 and 7 and overall we are content with EA's position.

10.40. It is clear that as well as initial consultations with service providers, ongoing co-ordination between them and the local authorities is vital to ensure that development is phased with major infrastructure provision. We questioned WSCC about these arrangements at the EiP. It explained that a system is in place but that it is informal and not a requirement. Crawley BC expressed the view that co-ordination is not working properly and that firmer commitments are needed from the water authorities. Given the importance of these matters and differing and changing views about whether or not there will be delays in provision, it is our view that co-ordination arrangements should be formalised with the service providers and the supporting text to Policy DEV3 should set out a requirement. This applies equally to health provision taking up Crawley BC's related point about the health authority's tendency to locate new

facilities without regard to areas earmarked for growth. We acknowledge that the police operate on a very different basis to the utilities and that much of what is said here does not apply but we consider it just as important that there should be liaison with them regarding the scale and programming of major development.

10.41. Whilst the service providers generally appear happy with the consultation on the DDSP, Dynamco, representing South East Water (who unfortunately did not take up their place at the EiP), said in its submission that it must be allowed to give its input with regard to development in Mid Sussex. WSCC accepts that in spite of its best efforts there have been difficulties making direct contact with South East Water but confirmed at the EiP that there has now been dialogue with Dynamco and the indication is that there will be no delivery problem. This particular communication difficulty reinforces our view that improved linkages with the service providers are needed.

The role of the developer

10.42. Some participants are concerned that at least part of the cost of this wider infrastructure provision would fall to the developers to fund and that this could affect the provision of other key elements required to support development at the strategic locations. WSCC had already made it clear at the EiP that provided requirements are already set out in planning documents in advance of land assembly, then financial obligations stemming from development will be reflected in the price paid for the land. Since land values have risen sharply in recent times there will be no impact on the feasibility of development or supporting provision. In the case of wider infrastructure provision there is in any event an expectation that the service provider pays but the developer may assist financially if there is a different expectation as to what is required. Portsmouth Water confirmed that the industry is heavily regulated and self financing but pointed out that developers, as well as meeting costs on site, do bear some of the remote costs such as mains reinforcement.

10.43. This is not a crucial matter in our view but since there is some lack of understanding of respective responsibilities in this area we think it would be useful and reassuring to readers if the plan could make it clear how all levels of infrastructure are funded. Our recommendations for Policy DEV 3, set out below, will assist; the greater clarity that we seek could be contained in the EM, perhaps in a modified paragraph 399.

Policy changes

10.44. Bearing in mind the complexity of the subject matter GOSE considers Policy DEV3 to be a very generic policy and wants the structure plan to provide greater steer. Thames Water also would like to see the policy expanded in relation to sewerage and water infrastructure. They see further changes being necessary if Policy W4 is to be deleted once the Waste Local Plan is adopted. We see value and greater clarity in splitting the policy into two parts, one dealing with on site works and what might be legitimately achieved through planning obligations and the other with the wider infrastructure requirements that we are discussing here, including matters of phasing and co-ordination and specific health matters like those raised by Crawley BC and Horsham DC (though much of the detail would be in the EM in line with what we say

in paragraph 10.40, above). WSCC agreed at the EiP that there could be advantages in such a split provided that there was no duplication with other policies. We make recommendations accordingly but leave WSCC to decide upon the precise nature of the revised policy and its wording having regard to our other recommendations.

10.45. A number of other policy changes have also been suggested in respect of matters relating to infrastructure, notably by the EA and Southern Water. We note that WSCC is amenable to taking suggestions on board in order to improve the plan and we will leave it to consider those where we have no particular view. We would comment specifically, though, on Southern Water's concerns about references to sustainable urban drainage systems (SUDS) in Policy ERA3(b)(2) which were discussed at the EiP. Southern Water, supported by the EA, points out that SUDS are not appropriate in all situations and yet the DDSP seems to place undue emphasis on them. WSCC accepts that there are alternatives and they may be preferable. We would wish to see this part of Policy ERA3 amended to reflect this position and we are happy for WSCC to take advice from Southern Water and other service providers on the detailed wording.

10.46. Regarding Portsmouth Water's concern about water efficiency in new housing we are satisfied that this is covered in Policy DEV1(a)(8&9). Similarly, on CPRE's point about the lack of standards and targets for infrastructure provision, we are satisfied that this is covered in paragraph 399 which refers to guidance offered by the local authorities. Though not strictly a policy matter we note what Thames Water said about the need for more capacity at Crawley sewage treatment works in relation to strategic development and we agree with WSCC that this needs to be taken account of in the Strategic Development Principles. We take this on board in our recommendations under Issue 6(i).

Related matters

10.47. The issue of flooding was raised at the EiP, Mr.Maidment making particular points about the likely impact of development at Burgess Hill due its location at the upper end of the river Adur's catchment and offering evidence on the effects of climate change over the last 50 years. There are similar issues in respect of development affecting the Arun valley. We understand and acknowledge that there are areas prone to flooding but we accept the best advice provided by the EA that the scale of development envisaged in the DDSP in principle can be accommodated satisfactorily. We agree with WSCC that development need not be held back on this score provided there are appropriate mitigation measures.

10.48. Mr Maidment also referred to poor husbandry on the part of the water companies in respect of restoration and aftercare. This is not really a matter for consideration under this issue but we have noted that the draft Waste Local Plan contains reference to waste water treatment and the need for restoration and we are happy to leave the matter to WSCC to deal with in this context.

Accommodating existing needs

10.49. One of the provisions of Policy DEV3(a) is that new development should not be permitted unless, where possible, it accommodates existing needs. Quite clearly policy should not run counter to Circular 1/97 which advises that developers should not be expected to pay for facilities which are needed solely in order to resolve existing deficiencies, though we note from GOSE's statement that government intends to move towards a more streamlined system that will enable the community to share in the benefits arising from development. We suspect that the issue here is just a matter of intention and wording, for WSCC has made it clear that there is no intention to go against the Circular. Nevertheless we can understand participants' concerns given the wording of the policy which we see as somewhat ambiguous and misleading and seemingly in conflict with what is said in paragraph 395 of the text. This is a view shared by GOSE.

10.50. We understand that what WSCC intends is that rather than making totally new provision it might be possible and make more sense in some instances to improve existing infrastructure, possibly in association with some existing programme, and thus bring benefits for the wider community. It says this approach should always be considered first. We also accept WSCC's point that whilst there is no compulsion on developers to make good deficiencies, there may be circumstances where they might volunteer to contribute to the cost of works if it were in their interests to do so. There was no disagreement at the EiP about these approaches.

10.51. Though some of the district authorities believe the wording should stand given that it has to be read in the context of Circular 1/97, the best way forward here in our view would be to remove all wording after 'West Sussex' in a revised Policy DEV3(a) and thus remove the ambiguity. WSCC's intentions regarding existing needs as explained in its statement and amplified at the EiP should be more clearly set out in the EM.

The Panel's overall conclusions

10.52. Given its expertise on these matters and on the basis of consultations that have been carried out we would generally support the EA's view that infrastructure provision relating to water supply, run off and sewage treatment can be made in relation to the plan's development strategy. We do see the need, however, for improved mechanisms of co-ordination between the local authorities and the service providers to ensure that things are delivered at the right time and on an appropriate scale. This applies to health as well as environmental infrastructure.

10.53. We see the need for some significant changes to Policy DEV3 so that it more fully recognises the complexities of infrastructure provision, not least the distinction between what is required on site and what is required elsewhere. Ambiguity regarding the accommodation of existing needs should be removed and WSCC's intentions in this regard clarified. Other, more minor, policy changes will be appropriate and we are happy to leave the details to WSCC and the service providers, save to say that the role of SUDS needs to be made clearer in view of representations by the EA and Southern Water.

10.54. With the changes that we recommend we are satisfied that the infrastructure provisions of the plan will be adequate, realistic and achievable.

Issue 10 (ii) Recommendations

10.55. We make the following recommendations:

Recommendation 10.8

WSCC should establish more formalised procedures for co-ordinating major development and infrastructure provision and these should be referred to in the EM to Policy DEV3.

Recommendation 10.9

Policy DEV 3 should be rearranged to distinguish between on site or local provision of infrastructure, (including planning obligations), and wider provision, together with how both are to be secured. Reference to development accommodating existing needs should be deleted. The words 'where possible' should be removed from (b)(1). The EM should explain how respective levels of infrastructure are to be funded and provide more clarity on the WSCC's intentions regarding accommodating existing needs.

Recommendation 10.10

Policy ERA3(b)(2) should be amended to reflect the fact that SUDS are not appropriate in all situations.

CHAPTER 11

ISSUE 11 RURAL AREAS

Does the plan achieve the right balance between protecting environmental and visual assets and providing for the economic and social needs of rural areas?

Background

11.1. Much of West Sussex comprises rural areas, many in AONBs. The increased importance given to sustainability and to the avoidance of greenfield sites for residential development except in accordance with the sequential approach results in many policies relating to such areas being inevitably negative in their formulation.

11.2. The main policy referring specifically to rural areas is LOC2. WSCC accepts that its wording, even as modified with PCs 30 and 31, could be improved to make the appropriate balance to be struck in rural areas clearer. We welcome the flexibility they show and many of our recommendations follow the lead set by WSCC in suggesting further improvements to the plan and setting out a more positive approach to the needs of rural areas. The one significant matter in which both WSCC and the districts decline to make any change is the subject of strategic gaps which we deal with under the first main issue below.

The Main Issues

11.3. The main issues are:

(a) Are the plan's policies on character and the environment too permissive or overly restrictive (including Policy CH6 [strategic gaps])? Should there be a more explicit strategy in the plan for rural areas and their regeneration?

(b) Should development other than for local needs be permitted in rural areas?

(c) Is sufficient attention paid in the plan to agriculture and farm diversification?

(d) Is the plan's stance on the development of brownfield sites in the countryside sufficiently clear?

Policies on Character and the Environment and the need for an explicit strategy for rural areas

Need for more flexibility and for an explicit strategy

11.4. In an area where there is such pressure for the development of land, and where many of the rural parts of the county are of especial value in terms of, for instance, their landscape quality or nature conservation importance, or have particular constraints such as being liable to flooding, the structure plan must necessarily contain many policies reflecting these considerations and preventing or limiting development in rural areas. At the same time a balance must be achieved with the maintenance and evolution of the rural economy. Although Action in Rural Sussex want increased flexibility, others, including the Sussex Association of Local Councils (SALC) and Horsham DC, would be satisfied if the plan were to make explicit what they see as now being implicit in relation to this balance.

11.5. We share this view. It would be unrealistic and simplistic for the plan to suggest that any single factor affecting the countryside can or should always take precedence. As Sigma Planning point out, essentially it must be for individual districts to assess the situation in the various parts of their areas, taking into account the varying problems and opportunities of each part. In doing this they will need to take careful account of the views of those living and working in these individual areas as well as other more general needs.

11.6. The structure plan needs a policy expressing what is said at the start of paragraph 91 - 'the economic and social needs of people who live and work in the countryside are also recognised and change must be accommodated'. It should set out the balance required between this and the need to protect and where possible enhance the countryside's essential character. As WSCC suggests, this could be best done by making Policy LOC2 refer only to general locational matters. A new Needs Policy should be added to deal specifically with rural needs. It would incorporate those sections which would be omitted from the new Policy LOC2. Together these two policies would provide a clearer guide to the appropriate overall balance needed in rural areas.

11.7. Some phrases which would need to be carried over to the new policies would be likely to present some difficulties of interpretation. 'A demonstrable need for a countryside location' and 'compatible with countryside locations' are examples. However, whilst it would be possible to define them in the structure plan we consider that their general intention is sufficiently clear for this to be better left to local plans, where local circumstances can be taken into account more fully.

Areas of Outstanding Natural Beauty (AONB) (Policy CH2)

11.8. As the conservation of the natural beauty of AONBs is a matter of national importance, Policy CH2 rightly attaches considerable weight to this factor. As PPG7 explains, 'in general, policies … affecting AONBs should favour conservation of the natural beauty of the landscape' (para 4.7). However, that paragraph goes on to state that 'it will also be appropriate to have regard to the economic and social well-being of the areas'. The concerns of Henry Smith, the Country Land and Business Association and others are that public perception is often that no development at all should be permitted in AONBs. Any such perception however would clearly be incorrect. The wording of Policy CH2 specifically permits development to meet identified local needs provided that it is consistent with the purposes of AONBs. This does not forbid the diversification of existing rural enterprises nor, more generally, should it conflict with the vital need to maintain the rural economy. It follows closely the advice in PPG7. We agree wholly with the view of SALC that the maintenance of old buildings in AONBs is crucial and with Action in Rural Sussex that AONBs could become test beds of sustainability. Neither of these views would however conflict with Policy CH2.

11.9. The policy goes on to indicate that proposals for major developments in AONBs should be permitted only in very exceptional circumstances and provided that they are consistent with national designation. Again, this follows closely the advice in PPG7 that 'it would normally be inconsistent with the aims of designation to permit the siting of major industrial or commercial development in [AONBs]'. Although this part of the policy adds little to national advice that would apply in any event, we can

see no reason in this instance to omit it as the policy does not encourage development which could be inconsistent with the fundamental purpose of AONBs.

11.10. As all policies of the plan would apply at all times, there is no need for a cross-reference between Policies LOC2 and CH2. Development in an AONB would be subject to both as well as to any relevant local plan policies. A number of built-up areas lie within AONBs. Policy CH2 would apply to development within those areas, but we disagree with Town and Country Planning Solutions in seeing no conflict between it and other policies provided that the former is interpreted strictly as being intended to conserve the natural beauty of their landscape. Development within built-up areas would accord or conflict with the policy depending on its effects on that natural beauty.

11.11. The proposed South Downs National Park is likely to include the relevant AONBs. FSAS wants an interim policy included for those areas which may be in the former but not the latter. We see no need for this. Such areas are likely to be allied closely to an existing AONB so that any development within them would already be subject to Policy CH2, and in particular to CH2(b)(2) which relates to the effects of development on AONBs even where the site is outside them. We assume that the word 'and' in this part of the policy should read 'any'.

Strategic Gaps (Policy CH6)

11.12. Although it is not possible to define the character of West Sussex by any single characteristic, we share WSCC's view in paragraph 294 of the DDSP that 'the County is typified by a pattern of closely-spaced small and medium-sized towns and villages' and strongly support the need 'to maintain the separate identity and character of settlements and prevent them from coalescing' (paragraph 293).

11.13. WSCC points out that the listing of strategic gaps in Policy CH6 is a long established tool to achieve this end. It and others regard them as a vital part of the preservation of the character of West Sussex, giving a clear guide to districts as to which gaps are of particular importance and where an assessment must be carried out as to which land should be identified as forming part of that gap. Horsham and Mid-Sussex DCs confirm that they have undertaken such assessments, taking into account up to 14 separate factors.

11.14. A range of participants at the EiP and other objectors have raised matters of concern about this policy with which we have some sympathy. Residents in some areas which are not included in currently identified strategic gaps are concerned lest their area is thereby missing a level of protection which might reasonably be justified; residents in or adjoining existing strategic gaps appear to have unjustified expectations about the permanency of the designation and seem to have difficulty in distinguishing between the objectives of the gap policy and those of Green Belt policy; development interests consider that in application if not in intention the strategic gaps policy is insufficiently responsive to local circumstances. We note that the list of gaps included in the policy identifies those of very different character and size, including areas where different levels of protection may be appropriate in local circumstances. Some commentators seem to see the policy more as a means of determining a planning strategy for an area than as a tool to implement a strategy drawn up following a comprehensive assessment of both the needs and constraints of the area.

11.15. We are unconvinced that as a whole the gaps listed in Policy CH6 have such special character or importance to make them of strategic significance, and we are concerned that listing them tends to reduce the significance attached to gaps between other settlements whose maintenance is also of importance in preserving their separate identity and the character of that part of West Sussex.

11.16. As we have explained earlier, the DDSP has no lack of policies intended to protect the countryside. We can see little need for a policy apparently intended primarily to reinforce these policies within the listed gaps. This casts doubt as to those policies' more general effectiveness and is likely to have the unintended but harmful effect of reducing the importance attached to the avoidance of the coalescence of settlements within other, unlisted, gaps. If, as we believe, WSCC is right to attach general importance to maintaining the separate identity and character of settlements, the listing of only 22 (23 with PC/59) of the gaps between them is likely to reduce rather than increase the attention given to this general importance. We recommend that Policy CH6 be modified to remove the list of specified strategic gaps, instead emphasising the vital more general importance of maintaining the separate identity and character of settlements throughout the county.

11.17. We appreciate the zeal with which strategic gap policies have been pursued previously by both the County and District Councils, and we would be concerned if our recommendation was wrongly interpreted as a relaxation in principle of policies designed to prevent the coalescence of settlements or to retain desirable environmental qualities. It is not intended to indicate that unrestricted development should be permitted in the currently defined strategic gaps or even that it would be acceptable to reduce gaps to the minimum necessary to avoid physical coalescence. The various other policies relating to development in the countryside, together with the remaining firm overall principle of Policy CH6 that the separate identity and character of all settlements will be maintained should be more than sufficient to prevent development which would be contrary to that principle. We think it important that the planning principles which apply to development within strategic gaps should apply throughout the county. The general application of the countryside policies throughout the non-urban parts of the county would secure this. These other countryside policies would also meet concerns expressed by the Sussex Wildlife Trust by protecting other more specific attributes of particular parts of specific gaps, such as their nature conservation value. At the same time it would be necessary to take into account other concerns, in particular those generally relating to sustainability, when considering the acceptability of a specific proposal.

11.18. One particular difficulty which our recommendation would avoid is that of the precise delineation in local plans of land subject to a strategic gap policy. These boundaries need to be reconsidered at each review of the local plan. As we explain earlier, Horsham, Mid-Sussex and other DCs do this using a large number of indicators. If the result of this is to remove areas from the strategic gap there is a considerable risk that this would be taken as an indication that development would be acceptable in the areas removed. This is indeed an inevitable result of the definition of precise boundaries. Alternatively if no change were to be made and the boundaries of the gap were to continue unaltered there is likely to be a perception that the protection offered by the policy is permanent. This would be likely to increase the apparent similarity between strategic gaps and Green Belt and this could be seen as devaluing the

significance attached nationally to the latter. Even if strategic gaps were to be retained it would be essential to distinguish clearly between the two forms of protection, in particular as regards their duration and to avoid what, despite Horsham's view to the contrary, still seems to some to be an apparent presumption against development within them. WSCC points out that the policy is not intended to prevent all development in strategic gaps, merely urban development. This is nonetheless similar in substance to the presumption against development in Green Belts other than that which is defined as being 'appropriate'.

11.19. Despite WSCC's concern that the plan should offer strategic guidance, we remain unconvinced that the gaps listed in Policy CH6 have any strategic qualities which set them apart from other gaps. As the CPRE and others point out, they vary greatly, and include both extensive gaps between substantial urban areas and the much smaller, and arguably more important and more vulnerable, gaps between the various coastal towns. Chichester DC and others are concerned about the protection of gaps which cross district boundaries. The modified policy which we recommend would however still impose a general need to maintain the separate identity and character of the settlements on each side of the gap and this, and any local plan policies deriving from it, would have to be taken into account very carefully in considering proposals in areas between settlements. This, together with more general policies relating to development in the countryside, would apply to development in all parts of such gaps and not merely on the edges of them. We do not regard this as being in any way an invitation to uncontrolled and harmful development leading to creeping urbanisation as WSCC suggests might occur. Rather it would provide greater flexibility to permit the kind of development necessary for the maintenance of the countryside economy and character within areas previously defined as strategic gaps, whilst at the same time providing additional protection at a structure plan level for land between settlements not previously listed as strategic gaps.

Other Structure Plan Policies on Character

11.20. West Sussex contains a number of areas of distinctive character which it is appropriate to maintain. Policy CH1 would do this in relation to the five main natural character areas of the county and we see no need to make it firmer or more specific. Like almost all of the 'CH' policies it refers not only to maintaining character but to its enhancement. However, this is always qualified by the words 'where possible'. We can see no reason why they should be removed from the policies and made part of supplementary planning guidance. Clearly the weight that should be given to the words 'where possible, enhances' and the practicality of achieving it will vary greatly depending upon the specific circumstances of a proposal, but it is a worthy aspiration which does not conflict with national policy and is appropriate for inclusion in the structure plan.

11.21. Policy CH1 applies generally to the distinctive character of the different parts of the County. Policies CH3, CH4, CH5 and CH7 are structured very similarly and relate respectively to woodlands and forests, rivers, waterways and wetlands, the coast, and settlements. Whilst Horsham DC, Arun DC and others do not dispute the importance of preserving the distinctive character of these various areas, they suggest that they could be replaced with a single policy. The detail which may well be necessary to

achieve this general strategic aim would then be a matter for local plans, which would no longer be fettered by unnecessary requirements.

11.22. We share this view. Policy CH1 should be expanded to include any significant parts of the other policies which do not simply repeat the contents of PPG7 or other national guidance. The multiplicity of similarly worded policies on character tends to reduce the effectiveness of the structure plan as a document setting out strategic policies. Although, as English Nature and others point out, areas of distinctive character do not respect district boundaries, this does not mean that the structure plan needs to set out very detailed instructions as to what should be included in local plans to ensure that there are no inconsistencies between adjoining LPAs as to the treatment of a landscape area running across their common boundary. Even if this were to be done similar problems would still remain with landscape areas crossing the county boundary. It is preferable to leave such matters to local plans. Objections to local plan policies which are materially inconsistent might be made by adjoining LPAs, GOSE or interested amenity bodies and could be tested as part of a local plan inquiry. Given the need for detailed and informed consideration of such matters this is better done at that stage than to take the form of a series of instructions as to the contents of local plans few if any of which would fail to be taken into account in any event in the competent production of a local plan. It would be possible, as David Pantling suggests, to include any parts omitted from the policy within the bullet points coloured red at the end of the explanatory text to the single unified policy that we recommend. They would not have the status of policy but might be a useful checklist as to the various techniques and activities whereby the aim of the policy might be achieved without unnecessarily fettering the discretion of the Districts. We therefore recommend this approach.

11.23. The Sussex Downs Conservation Board suggests that policies should pay greater attention to encouraging the use of local materials. Whilst we agree as to the desirability of this in terms of help to the local economy, improved design and increased sustainability, we regard it as too detailed a matter to form a specific part of a structure plan policy. It might perhaps be one means by which the strategic policy could be implemented by means of local plans, but this would be a matter for consideration by the relevant districts. Similar considerations apply to the use of parish plans to inform districts as to the appropriate forms for local plan policies concerning the retention of the distinctiveness of rural areas.

Local Needs and other development in Rural Areas

11.24. It is clear that much useful consultation and study has already been undertaken by many of the districts towards identifying the needs of specific rural communities. There is general agreement that this must be done on an individual basis and in the form of two-way discussion of the particular concerns of each community. This is likely to go beyond the general need for affordable housing, and might include accommodation for key workers, care over the size and type of new housing, avoiding standard 'executive' dwellings, or development for small businesses. Parish plans may be a useful tool in identifying such needs. Sustainability in its widest aspects must be taken into account.

11.25. We can see no advantage in attempting a county-wide definition of the concept of 'local needs' in the structure plan as suggested by Chichester DC. We share their

view that it is likely to relate basically to the needs of the existing population rather than of those aspiring to live or work in the countryside, but consider that it should be established for individual settlements or groups of settlements in the light of more detailed policies included in local plans. This is very much a subject that is better approached upwards from detailed assessment rather than downwards from a strategic overview.

11.26. We do not regard it as possible to provide a single consistent definition of what industrial or business activities are appropriate in rural areas. If a definition needs to be included this should be done in local plans, taking account of the specific circumstances of particular parts of their districts. The structure plan should instead continue to refer more generally to development which would assist in sustaining the countryside as a place of varied and productive social and economic activity.

Agriculture and Farm Diversification

11.27. As Henry Smith points out, in most rural areas the main use remains farming, which needs a consistent and sustainable approach from the structure plan. We share the views of many of the participants, including the Sussex Downs Conservation Board and Action in Rural Sussex, as to the importance of farm diversification in enabling the overall method of land management to continue. Others, including FSAS and Sigma Planning, whilst agreeing with this, point out that diversification can mean the loss of the fundamental use and be little more than a form of asset stripping. We share this concern. There is a need for farm diversification to be mentioned specifically in a structure plan policy as means of enabling the continued survival of farming.

11.28. Henry Smith draws attention to the value of whole farm plans in giving a picture of the way in which the overall management of a particular unit can impact on rural areas. Whilst they are essentially a tool rather than a matter of policy, we share their view, and that of Horsham DC and the Sussex Downs Conservation Board, that they should be mentioned in the EM.

11.29. We have concluded earlier that there would be considerable merit in including a general policy in the section on needs relating to rural areas and reducing Policy LOC2 to concentrate on locational criteria. The new NE Policy would be an appropriate place in which to express support for farm diversification as a specific rural need.

'Brownfield' sites in the countryside

11.30. Annex C to PPG3 defines previously developed land so as specifically to exclude land previously occupied by agricultural or forestry buildings, land and buildings currently in use for agricultural or forestry purposes and land where the remains of any structure or activity have blended into the landscape in the process of time. Thus although some of the extensive areas of glasshouses found in the county have reached the end of their useful life they would not fit into the definition of previously developed land to which the advice in PPG3 applies.

11.31. That does not mean, however, that the structure plan should not contain policies relevant to such sites. We accept the general view on this of many of the participants, including the Country Land and Business Association and Action in Rural Sussex. It

is necessary to define what is meant by 'rural brownfield land' and provide firm guidelines as to how to approach its re-use. Former glasshouses, for instance, can be very expensive to re-use or in some cases even to redevelop, but we agree with Sigma Planning that they may provide opportunities to meet rural needs beyond those identified as applying only in respect of the immediate locality. We note that permission has been given by Chichester DC for the redevelopment of a turkey farm as an exception to current policies because of the particular benefits that this scheme would have, and agree that although there would be value in setting out county-wide guidelines, their detailed application will require careful consideration of local circumstances.

11.32. As Action in Rural Sussex suggests, it is not sufficient merely to apply a sequential test in these circumstances. Indeed, even for residential development to which PPG3 applies, a sequential approach rather than a sequential test is appropriate. Great weight should be attached to the nature of the site - whether previously developed or greenfield land - but attention must also be paid to the sustainability of its location. The nature of rural areas will often mean that they are not the most sustainable locations for activities which could equally be carried on in urban areas or close to nodes on public transport routes. Nonetheless clear evidence of local need for the specific use, for the employment that it brings or for any environmental benefits that would result from development may be sufficient reason to permit the redevelopment of particular sites for uses which in general locational terms would normally be expected to be better located elsewhere. There will however be some more remote sites which are so badly located in terms of sustainability for development as not to be acceptable even if such evidence could be obtained. Housing would seldom if ever be likely to be acceptable and would require evidence of a particularly compelling nature to be produced.

11.33. We recommend earlier that Policy LOC2 should be split into those parts dealing with locational matters which should remain and a new Needs Policy dealing specifically with rural areas. However Policy LOC2, even as modified by PCs 30 and 31, is not sufficiently positive as to the need for some forms of development to meet the needs of those areas. Although it is essential to avoid any suggestion of the kind of general presumption in favour of development of some sort which will normally apply within the boundaries of built-up areas as defined in local plans, a more positive approach to development to meet rural needs is desirable.

11.34. The new Policy LOC2 should define 'previously developed rural land' and set out clear guidelines for when its re-use may be acceptable. It should continue to require development to be 'compatible with its location in the countryside'. This would embrace a variety of considerations including its visual effects on the surrounding area, on wildlife - taking into account that previously developed sites can be more valuable in this respect than greenfield land - and on the general character of the area. It would be for local plans to apply this to particular sites or areas in greater detail.

The Panel's Overall Conclusions

11.35. As we explain in the background to this issue, WSCC shows commendable flexibility in its approach to the relevant policies. Many of our recommendations follow

suggestions which it made or accepted during the course of the examination. Only in respect of strategic gaps (Policy CH6) do our recommendations depart materially from WSCC's final position.

11.36. We are well aware of the long history of strategic gaps in West Sussex and of the ways in which the policy set out in the structure plan differs from the approach in earlier plans. Nonetheless, considering it in the light of the structure plan as a whole and of current national policies, we consider that a simpler and less specific approach would be more appropriate. This would no longer list specific gaps but would rather set out a general policy aimed at avoiding coalescence. The way in which this would be achieved would be for individual local plans, and might well differ between them. For instance, in the comparatively narrow and especially vulnerable gaps along the coastal area it might well be appropriate to continue to identify specific areas where development of almost any sort would not be acceptable. In the much wider areas between the main towns or between the larger towns and villages, more general policies requiring a more detailed consideration of the effect on those gaps of specific proposals might well be more appropriate. The wording of such policies or defining where they might apply is not however a matter for us. We are however in no doubt that despite their name many of the so-called 'strategic gaps' do not have a strategic nature and their listing in the structure plan tends to deflect attention away from and reduce the protection offered in respect of other generally open areas separating communities.

Recommendations

11.37. We make the following recommendations.

Recommendation 11.1

Policy LOC2 should be replaced in a shorter form dealing only with locational matters. It should be worded as follows:

> **'Development in the countryside, including undeveloped coastal locations, will not be permitted unless it can be demonstrated to require a countryside location or to meet identified local economic or social needs. Such development should be compatible with its location in the countryside and should either assist in sustaining the countryside as a place of varied and productive social and economic activity or should result in substantial environmental enhancement. The re-use of existing buildings for these purposes will be acceptable, as will be the redevelopment of previously developed rural land in sustainable locations where it would meet these criteria and could not be re-used for agricultural or forestry use at economic cost. Previously developed rural land is that outside built-up areas which contains permanent buildings or structures or associated fixed surface infrastructure which is no longer in use but which has not so far blended into the landscape in the process of time to such an extent that it can reasonably be regarded as part of the natural surroundings.'**

Recommendation 11.2

An additional policy should be included in the Needs Chapter to deal with rural needs. It should contain the main sections omitted from Policy LOC2 and should support farm diversification where that would result in the survival of the farm and a generally agricultural form of land management.

The Explanatory Memorandum supporting this new NE Policy should advocate the use of parish plans and whole farm plans as valuable tools in the production of appropriate local plan policies.

Recommendation 11.3

Policies CH3, CH4, CH5 and CH7 should be deleted. Any part of their content which is of strategic importance and does not repeat what is said in national guidance should be incorporated into Policy CH1. Detailed advice to district councils as to the production of local plans which would be otherwise be omitted as a result of these recommendations should be included in the bullet points following paragraph 263.

Recommendation 11.4

Policy CH6 should be modified to omit the list of strategic gaps in (a) and the whole of (b). The remaining text should be worded as follows: "Development should not be permitted unless the strategic settlement pattern of the County will be retained. The separate identity and character of settlements will be maintained and, where possible, enhanced, and their coalescence will be prevented."

CHAPTER 12

ISSUE 12 AFFORDABLE HOUSING

Does the plan place sufficient emphasis on the provision of affordable housing?

Background

12.1. Policy H4 of RPG9 requires affordable housing to be provided to meet locally assessed need. It sets out a detailed list of actions for district councils, including undertaking local housing needs assessments and monitoring the provision of affordable housing against their local targets.

12.2. WSCC has put forward a new policy NE2(PC) to replace those parts of Policy NE2 which concern housing provision for those not able to compete in the general market.

The main issues

12.3. The main issues are:

(a) Should there be a separate and stronger policy on affordable housing?

(b) Does the plan provide sufficient guidance to the districts on the proportion of affordable housing they should be negotiating?

(c) Should targets be added to Policy NE1?

(d) Is there a need to give more emphasis to provision for key workers and those with special housing needs?

(e) Should the plan be more explicit about how affordable housing needs should be met in rural areas?

The general arrangement and strength of policies

12.4. None of the participants doubt the importance for West Sussex and indeed for the region as a whole of the provision of affordable housing. The current serious shortage leads to increased commuting, a reduction in the efficiency of the local economy and, above all, hardship and difficulties for many of those living or working in the area. There is no disagreement either as to the importance of the development plan system in ensuring that suitable provision will be made. Circular 6/98 gives detailed advice nationally on how this should be done. This advice relates however to the content of policies in local plans and warns that structure plans should not provide detailed guidance. Under these circumstances we share the view of WSCC that although affordable housing, as a significant issue affecting those living or wanting to live in the county, should be the subject of a policy in the structure plan as an indication of its importance, in itself such a policy can provide little detailed guidance, that being a function of local plans.

12.5. Circular 6/98 requires local plan policies seeking affordable housing to define what is regarded as affordable in a way that includes both low-cost market and subsidised housing, both having some role to play in meeting local needs. WSCC confirmed during the EiP discussions that Policy NE2(PC) in referring to affordable housing is not intended to cover low-cost market housing. Policy NE2 would however continue to require local plans to include policies on the mix of particular housing developments taking into account the need for 'low-cost housing aimed at the lower-end of the market'. Thus the structure plan would continue to refer clearly to the need

for both types of affordable housing, albeit in separate policies. The use of the term 'affordable' to refer to only one of these two components would be likely to be seriously misleading to users of the plan unless the term were to be clearly defined in the policy, the Glossary and the EM, as well as for there to be a cross-reference to the other component. We accept that in the particular circumstances of West Sussex developers may well only be able to provide low-cost market housing by means of a cross subsidy from higher cost homes.

12.6. Each of the districts when producing the relevant policies of their local plans will need to produce their own definitions in accordance with advice current at that time. We consider that the term 'affordable housing' used in Policy NE2(PC) should be defined to explain precisely which component of affordable housing it refers to, and that consequential amendments should be made to the EM. There would then be less risk of conflict with national guidance or of confusion with the ways in which the term is used in the local plans produced following this plan. We recommend accordingly, although we can see considerable merit in the alternative approach of substituting an alternative term to 'affordable' in Policy NE2(PC).

The proportion of housing that should be affordable

12.7. Horsham DC and others want the policy to include a clear target to enable them to take a firm line with potential developers to obtain a sufficient provision of affordable housing. Circular 6/98 however warns against the imposition on districts in a structure plan of "a so-called 'normal' proportion of affordable housing to be secured". It goes on to advise that local plans will need to define the number of affordable homes needed throughout the plan area and to set indicative targets for specific sites. It is at that time and against that background that negotiations with developers will be undertaken. The figures included in local plans will need to follow a clear methodology to show the extent and nature of need in that district and to show clearly how the target for that area will be achieved. All of these may well vary greatly between the districts so that the inclusion of a specific overall target in the structure plan would not only be contrary to national guidance but be liable to cause confusion to developers and in the production of local plans.

12.8. Para 118 of the DDSP as proposed to be modified by PC/35 would state that 'the aim generally should be for residential development to include a proportion of affordable housing in the order of 30-40% of the total dwellings'. Although WSCC states that this is not intended to have the status of policy, we note the concern of Independent Town Planning Services that if included in this form in the EM there would be a risk of its status being misinterpreted. WSCC suggests that this paragraph be modified to make it clear that the figures are included as a general indication of the likely order of the anticipated proportion of housing that should be affordable, and that the exact figure will be likely to vary between districts. We support such a change which would also incorporate an indication of the derivation of the figures and a clear statement that, like those included in RPG9, they would be essentially provisional indicators of the order of size required.

12.9. This would also have some support from GOSE, the HBF and others. It should also be sufficient to meet the concerns of Chichester District Community Housing that landowners and developers should be made aware of the possible order of size of the proportion of affordable housing that would be sought. This might have a tendency to

reduce any unrealistically high expectations of land prices. Although Independent Town Planning Services are concerned that a figure as high as 30-40% might prevent the redevelopment of some areas of previously developed land as its non-residential use value might be greater, we note that Worthing BC have achieved such a proportion on previously developed land. In view of this and provided that the text was modified to make it clear that the figures are provisional indicators rather than targets we consider that figures of 30-40% should be included in the EM.

Key workers and those with special housing needs

12.10. Key workers are included in Policy NE2(PC)(a) as one of the groups of people who are not able to compete in the general housing market. There is little disagreement as to the importance of ensuring that suitable housing is available for such workers, especially in rural areas, or that not all will need subsidised housing. Charles Planning want the structure plan to include a county-wide definition of the term 'key workers' to avoid unfairness, but others would prefer it to be defined in local plans.

12.11. Whilst we share concerns over the urgent need to ensure that housing is available for those key workers unable to compete in the general housing market and are aware of the possible difficulty arising where a person defined as a key worker in one district might not fall within the definition applying an adjoining district, we regard both the definition and the choice and implementation of methods of making provision as being essentially matters for the districts. Apparent inconsistencies may well arise, but this should be expected due to the inherently different circumstances which apply in the various districts. Even if a uniform approach were to be adopted throughout West Sussex it would be likely to differ to a greater or lesser extent from that in adjoining counties. Unless a uniform approach were to apply nationally there will always be differences of approach between some adjoining districts. It is preferable for each district to produce definitions based on its circumstances and needs. The joint work which we understand is already in progress should help to reduce any difficulties which might otherwise occur because of it.

12.12. New development should also provide for the needs of other special groups, such as those with physical disabilities or learning difficulties. These needs are referred to in Policy NE2(b)(1)(iii) and (b)(4) but Inventures are rightly concerned that development specifically for such groups may not be able also to support the provision of more general affordable housing. A degree of flexibility is therefore required, but, once again, this is more properly a matter which should be addressed in local plans. The policies of the structure plan set out an appropriate framework for this.

Affordable housing in rural areas

12.13. Policy NE2(PC)(b)(2)(ii) requires local plans to include so-called 'exceptions' policies for the provision of social housing outside built-up areas. Horsham DC and Action in Rural Sussex want this replaced with a framework which would go beyond this to encourage a more innovative approach. We see no need for this. Policy NE2(PC) would require local plans to incorporate an accepted method of provision, but would not prevent the inclusion of further, perhaps more innovative, methods. Similarly we can see considerable merit in the use of parish plans to inform and possibly to give supplementary planning guidance on local plans in dealing with rural needs, but we agree with WSCC that this is essentially a matter for the districts in

producing local plans. Nothing would be gained by including a reference to these matters in structure plan policies, and we can see little practical advantage in expanding the explanatory memorandum to explain this or to indicate that innovative solutions may be appropriate.

12.14. Paragraph 119 of the EM states that 'in small villages and subject to evidence of need and financial viability, the provision of a new 'affordable' dwelling should be secured for every market dwelling which is permitted'. Despite WSCC's intention that this should be a strong steer rather than a policy requirement, its phraseology would be likely to cause ambiguity as to whether it is intended to be read as part of a policy. The Council's intention would be better served by the alternative put forward by Chichester DC of replacing the final part of the sentence ("should be … permitted") with "may be secured on even the smallest sites".

The Panel's overall conclusions

12.15. It would be hard to overstate the importance of ensuring the provision of affordable housing throughout the county. The onerous responsibility for producing, justifying and implementing suitable policies in local plans to do this will fall to the districts although we accept that it is desirable for the structure plan to contain a policy on the subject. Subject to our recommendations, which would help to avoid unnecessary and potentially misleading detail and ensure that there is no risk that parts of the EM might be taken as being policies, we consider that Policies NE2 and NE2(PC) would place sufficient emphasis on the provision of affordable housing.

Recommendations

12.16. We make the following recommendations.

Recommendation 12.1
Modify Policy NE2 and add Policy NE2(PC) as set out in PC/34.

Recommendation 12.2
Include a precise explanation of what is meant by the phrase 'affordable housing' in Policy NE2(PC), the EM and the glossary, and add a cross-reference in the EM to the ways in which low-cost market housing will be provided.

Recommendation 12.3
Indicate in paragraph 118 the derivation of the figures "30-40%" added by PC/35 and explain that, like those included in RPG9, they would be essentially provisional indicators of the order of size required.

Recommendation 12.4
Replace the final part of the penultimate sentence of paragraph 119 ("should be … permitted") with "may be secured on even the smallest sites".

APPENDIX A

West Sussex Structure Plan 2001-2016

Examination in Public - Issues and Invited Participants (November 2002)

NB: Respondent numbers in brackets (NR = no response to consultation on Deposit Draft).

Issue 1: The Regional Context

Does the Development Strategy adequately reflect Regional Planning Guidance (RPG)?

To include:

(a) Does the Development Strategy adequately reflect the intentions of Regional Planning Guidance with regard to:
  (i) the Western Policy Area?
  (ii) coastal regeneration?
  (iii) the rest of the County?

(b) In reality, how can coastal areas benefit from economic growth in the north east of the County? How far does the Plan nurture this link?

Issue 2: People, Homes and Jobs

Should the Plan seek to maintain or change the existing balance and distribution of people, homes and jobs in the County?

To include:

(a) What should be the relationship between the level of residential and employment development?

(b) What should be the broad distribution of the overall dwellings requirement between the Districts?

(c) What should be the broad distribution of employment floorspace between the Districts?

Participants for Issues 1-2

Adur District Council (00201)

Arun District Council (00451)
Chichester District Council (02947)
Crawley Borough Council (03002)
Horsham District Council (02914)

Mid Sussex District Council (02997)
Worthing Borough Council (03024)

East Sussex County Council (02998)

Reigate and Banstead Borough Council (00197)
Government Office for the South East (02944)
South East England Regional Assembly (06397)

Berkeley Strategic Land & Fletcher Trust (07614)
Boyer Planning (George Wimpey UK) (07593)
House Builders Federation (07608)

Country Land and Business Assoc. (CLA) (07550)

CADIA(07542)

Council for the Protection of Rural England (00355)
Federation of Sussex Amenity Societies (07481)
Sussex Association of Local Councils (00380)
Sussex Rural Community Council (00394)

Issue 3: The Locational Strategy

Is the Locational Strategy the most appropriate for delivering the required quantum of development?

To include:

(a) Is the rationale for the selection of the Strategic Locations sufficiently clear? Should the strategic commitments be included on the list?

(b) Is there a case for more emphasis and greater priority being placed on small-scale greenfield settlement extensions, particularly extensions to urban areas? Would small urban extensions be any less sustainable than the proposed Strategic Locations?

(c) Should contingency be built into the Strategy to allow for the North East Sector (Crawley) not coming forward and for a possible shortfall on previously-developed land (PDL)? How should the Plan address a possible need to increase house building rates post-2006 following an RPG review? Should reserve locations be identified?

(d) Should the identification of Strategic Locations be more or less precise?

Participants for Issue 3

Adur District Council (00201)
Arun District Council (00451)
Chichester District Council (02947)
Crawley Borough Council (03002)
Horsham District Council (02914)
Mid Sussex District Council (02997)
Worthing Borough Council (03024)

East Sussex County Council (02998)

Government Office for the South East (02944)

Barton Willmore (Redrow, Pye) (03160/07620)
Berkeley Strategic Land & Fletcher Trust (07614)
Boyer Planning (Wimpey) (07593)
David Pantling (Laing Homes) (07623)
House Builders Federation (07608)

Council for the Protection of Rural England (00355)
Country Land and Business Assoc. (CLA) (07550)
Federation of Sussex Amenity Societies (07481)
Sussex Association of Local Councils (00380)
Sussex Rural Community Council (00394)

Issue 4: Urban Capacity

What is the realistic contribution of previously-developed land (PDL) to the overall housing requirement?

To include:

(a) Is the Chesterton study sufficiently robust to provide the basis for the Plan's assumptions on PDL? How well does it relate to the Government's Best Practice guidance?
(b) Should the overall PDL target be increased to 60% to accord with RPG?
(c) Will acceptable and appropriate policies be in place to enable PDL targets to be met?

Participants for Issue 4

Adur District Council (00201)

Arun District Council (00451)
Chichester District Council (02947)
Crawley Borough Council (03002)
Horsham District Council (02914)
Mid Sussex District Council (02997)
Worthing Borough Council (03024)

Council for the Protection of Rural England (00355)
Federation of Sussex Amenity Societies (07481)
Sussex Association of Local Councils (00380)

Barton Willmore (Bellway, Wates) (02885/07611)
Boyer Planning (Wimpey) (07593)
Charles Planning (Croudace) (02985)
David Pantling (Laing Homes) (07623)
House Builders Federation (07608)
Independent Town Planning Services (02934)
Philip Stone (RUKBA) (06347)

Government Office for the South East (02944)

Issue 5: Strategic Housing Requirement

(i) Does the Plan make adequate provision for residential development?

To include:

(a) Should figures be expressed as net rather than gross? Are the assumptions on which the difference is based robust? Is the relationship between the two sufficiently clear?

(b) Should there be a 10% flexibility allowance to take account of some allocations not coming forward?

(c) To what extent has there been an under-provision of housing in the period 1994-2001, and how should this be addressed?

(ii-iv) Distribution of the Strategic Housing Requirement for each District

For **(ii) Crawley, Horsham and Mid Sussex**; **(iii) Chichester and Arun**; and **(iv) Adur and Worthing**, to consider matters including the following:

(a) Will commitments and PDL yield the necessary provision in the early years of the Plan?

(b) Are the annual average build rates realistic and achievable? How do they relate to likely demand?

(c) What might realistically be achievable through small-scale greenfield extensions to the main towns in passenger transport corridors and to villages and small towns?

(d) Where applicable, do the committed Strategic Locations (east of Angmering, Crawley (North East Sector), south-west and south-east of Haywards Heath, Worthing (Durrington) and north of Bognor Regis) offer more potential than suggested in the Plan?

Participants for Issues 5(i) (ii) (iii) & (iv):

Adur District Council (00201)
Arun District Council (00451)
Chichester District Council (02947)

Crawley Borough Council (03002)
Horsham District Council (02914)
Mid Sussex District Council (02997)
Worthing Borough Council (03024)

Government Office for the South East (02944)

Berkeley Strategic Land & Fletcher Trust (07614)
House Builders Federation (07608)
Lennon Planning (Hargreaves, Ward Homes) (03100/07586)
Richard Maile (Galliford, Try Homes) (05088)
Richard Stubbs (07509)

Council for the Protection of Rural England (00355)
Federation of Sussex Amenity Societies (07481)
Sussex Association of Local Councils (00380)

Additional Participants for Issue 5(ii) only:

Thames Water (03008)

Barton Willmore (NE Sector Crawley Consortium) (07622)

David Pantling (RUKBA c/o Philip Stone) (06347)

David Wilson Estates (07595)
DPDS (Countryside Properties) (07567)
Jones Lang LaSalle (English Partnerships) (02951)

Additional Participants for Issue 5(iii) only:

Chichester Society (03007)
Felpham Association of Ratepayers (07598)
Boyer Planning (George Wimpey) (07593)
Cluttons (Church Commissioners) (04339)

DLP (Hallam Land Management) (02986)
First City (Tarmac) (07617)
Westbury Homes (03155)

Additional Participants for Issue 5(iv) only:

Enplan (New Monks Farm) (07601)
FPD Savills (W. Durrington Consort.) (07629)
Westbury Homes (03155)

Shoreham Port Authority (00212)
Worthing Green Party (07479)

Issue 6: The Strategic Locations (North east of the County & A23 road/rail corridor)

Do the new Strategic Locations identified in Policy LOC1(b.2 & b.3) offer the best opportunities for sustainable strategic development?

For **(i) west of Crawley**, **(ii) west and/or south-west of Horsham**, **(iii) west of East Grinstead**, and **(iv) west of Burgess Hill**, to consider matters including the following:

(a) What would be the impact on features of acknowledged importance and what are the environmental constraints (including the risk of flooding, and the impact on Strategic Gaps)?

(b) What are the transport implications and needs?

(c) What would be an appropriate timescale for development having regard to the necessary infrastructure provision and how much development could realistically be provided?

(d) Are there alternative and better locations for strategic development close by?

Participants for Issues 6(i) (ii) (iii) & (iv)

Crawley Borough Council (03002)
Horsham District Council (02914)
Mid Sussex District Council (02997)

Council for the Protection of Rural England (00355)
Sussex Wildlife Trust (00613)

Government Office for the South East (02944)
English Nature (00217)
Environment Agency (00219)
Highways Agency (00223)

Additional Participants for Issue 6(i) only

Community Against Urban Sprawl (NRCAUS)

Horsham Society (03025)
Ifield Village Association (NRIVA)
Keep Rusper Green ACG (03020)

Rusper Parish Council (07375)

FPD Savills (Crest Strategic & Mr Calvert) (07602)
George Wimpey UK (07580)

Jones Lang LaSalle (English Partnerships) (02951)
Lamont Planning (LECC) (07626)
Richard Maile (Galliford, Try) (05088)
P.J. Hodskinson (Squires Bridge Homes) (07594)

Additional Participants for Issue 6(ii) only

Southwater Action Group (02929)

Southwater and Broadbridge Heath Parish Councils (02865/02175)

Weald Vale Association (00526)
Weald Vale Association Limited (07993)

Berkeley Strategic Land & Fletcher Trust (07614)
David Wilson Estates (07595)
DPDS (Countryside Properties) (07567)
Independent Town Planning Services (02934)
P.J. Hodskinson (Squires Bridge Homes) (07594)

Additional Participants for Issue 6(iii) only

East Sussex County Council (02998)

Tandridge District Council (00198)

Association of Imberhorne Residents (07430)
Copthorne Village Association (03547)
East Grinstead Society (00558)
East Grinstead Town Council (04487)

Barton Willmore (Bryant, Persimmon, Rialto) (07613)
Crest Strategic Projects (03153)
Lennon Planning (03129)

National Trust (Southern Region) (00626)

Additional Participants for Issue 6(iv) only

East Sussex County Council (02998)

Christopher Maidment (individual) (07295)
Greenfield Guardians (c/o 03798)
Hurstpierpoint Historical Society (07379)

David Pantling (Laing Homes) (07623)
DPDS (Bryant Homes) (07600)
Miller Hughes (West Burgess Hill Co.) (02984)
Parker Dann (Phelan Trust) (02991)
Anthony Padfield Town Planning (Strategic Land Investment) (07976)

Speer Dade *

* representing Burgess Hill Town Council (02933), and Albourne (07426), Bolney (04336), Cuckfield (02913), Cuckfield Rural (07017), Hurstpierpoint and Sayers Common (02939), Slaugham (04478), and Twineham (01905) Parish Councils. One seat to cover all parish and town council interests.

Issue 7: The Strategic Locations (Coastal area)

Do the new Strategic Locations identified in Policy LOC1(b.2 & b.3) offer the best opportunities for sustainable strategic development?

For **(i) south-west of Chichester City** and **(ii) east of Chichester District/west of Arun District**, to consider matters including the following:

(a) What would be the impact on features of acknowledged importance and what are the environmental constraints (including the risk of flooding, and the impact on Strategic Gaps)?

(b) What are the transport implications and needs?

(c) What would be an appropriate timescale for development having regard to the necessary infrastructure provision and how much development could realistically be provided?

(d) Are there alternative and better locations for strategic development close by?

Participants for Issues 7(i) & (ii):

Arun District Council (00451)
Chichester District Council (02947)
Government Office for the South East (02944)
English Nature (00217)
Environment Agency (00219)
Highways Agency (00223)
Sussex Wildlife Trust (00613)
Barton Willmore (Redrow, Wates) (03160/07611)
Charles Planning (Croudace, Swan Hill) (02985/07633)
Cluttons (Church Commisioners) (04339)
Chichester District Community Housing (07562)
Chichester Friends of the Earth (07514)
Council for the Protection of Rural England (00355)

Additional Participants for Issue 7(i) only:

Chichester Harbour Conservancy (00208)
Chi. Residents Association Co-ord. Grp (05338)
Chichester Society (03007)
Manhood Peninsula Partnership (07547)
Berkeley Strategic (07614)
First City (Tarmac) (07617)
Hawthorne Kamm (Linden Homes) (07597)
Southern Planning Practice (Cala Homes) (07606)

Chichester City Council (03005), Donnington and Fisbourne Parish Councils (02887/03885), and Apuldram Parish Meeting *
English Heritage (00216)
* one seat to cover all parish and town council interests

Additional Participants for Issue 7(ii) only:

Five Villages Society (00614)
Bognor Regis Civic Society (NRBRCS)
Derek Waller (individual) (03672)
Richard Maile (Mr D Heaver) (08094)
Enplan (Antony Greenwood) (07624)
Independent Town Planning Services (02934)
Sussex Association of Local Councils (00380) seat to cover Arun parishes
Tangmere Parish Council (07515)

Issue 8: The Release of Housing Land

Will the Plan's stance on the release of land for housing provide for the total requirement and maintain an adequate supply?

To include:

(a) What are the implications of the provisions of Policies NE1(b.2) and NE3(a) for the effective planning of greenfield development?

(b) Is Policy NE3 in accordance with Government guidance in PPG3? Is it needed in the Structure Plan?

(c) Is the phasing of development as envisaged in Table 2 of Policy NE1 likely to be manageable and achievable by District Authorities? Should Table 2 be part of Policy NE1 or at least referred to in it?

Participants for Issue 8

Adur District Council (00201)
Arun District Council (00451)
Chichester District Council (02947)
Crawley Borough Council (03002)
Horsham District Council (02914)
Mid Sussex District Council (02997)
Worthing Borough Council (03024)

Government Office for the South East (02944)
Council for the Protection of Rural England (00355)

Federation of Sussex Amenity Societies (07481)
Sussex Association of Local Councils (00380)

Barton Willmore (Bellway) (02885)
Broadway Malyan (NR)
Charles Planning (Croudace) (02985)
Cluttons (Church Commissioners) (04339)
David Pantling (Laing Homes) (07623)
David Wilson Estates (07595)
DLP Consultants (Hallam Land Man.) (02986)
House Builders Federation (07608)

Town & Country Planning Solutions (Gleeson) (00468)

Issue 9: Strategic Employment Requirement

(i) Does the Plan adequately provide for economic growth in the North East of the County?

To include:
(a) Does the Plan make adequate provision for new business and inward investment?
(b) Is the basis for the employment land allocation in each district sufficiently clear?
(c) Are mechanisms for the release of employment land sufficiently clear?
(d) Does the Plan provide for the needs of Gatwick Airport (if applicable, taking into account the outcome of SERAS)?

(ii) Does the Plan adequately provide for coastal regeneration?

To include:
(a) Does the Plan make adequate provision for new business and inward investment?
(b) Is the basis for the employment land allocation in each district sufficiently clear?
(c) Are mechanisms for the release of employment land sufficiently clear?
(d) Should more emphasis be placed on the roles of Shoreham Airport and Harbour in coastal regeneration?

Participants for Issues 9(i) & (ii):

Government Office for the South East (02944)

CADIA (07542)

Council for the Protection of Rural England (00355)

Federation of Sussex Amenity Societies (07481)

Additional Participants for Issue 9(i) only:

Crawley Borough Council (03002)
Horsham District Council (02914)
Mid Sussex District Council (02997)
Sussex Association of Local Councils (00380)
Sussex Enterprise (00333)

BAA London Gatwick (03064)

DPDS (Asiacom Holdings) (07596)
Jones Lang LaSalle (English Partnerships) (02951)

Additional Participants for Issue 9(ii) only:

Adur District Council (00201)
Arun District Council (00451)
Chichester District Council (02947)
Worthing Borough Council (03024)
Selsey Town Council (02909)

Adur Economic Partnership (00288)
West Sussex Economic Partnership (03529)
Shoreham Port Authority (00212)
Shoreham Airport (00325)

Enplan (New Monks Farm Developments) (07601)

Issue 10: Transport and Infrastructure

(i) Are the transport provisions of the Plan adequate, realistic and achievable?

To include:

(a) Is the right balance achieved between public transport improvements and road schemes?

(b) Should there be a more obvious relationship between the plan's policies and the Local Transport Plan?

(c) What are the implications for the strategic transport network of the concentration of development in the north east of the County?

(d) How might the plan's transport proposals, and their relationship to the Strategic Locations, be influenced by the draft Regional Transport Strategy and South Coast Multi-Modal Study?

(ii) Are the infrastructure provisions of the Plan adequate, realistic and achievable?

To include:

(a) How should the broader infrastructure requirements arising from development be satisfied (for example, policing, health, water supply, sewage treatment)?

(b) To what extent, if any, should development be expected to accommodate existing needs?

Participants for Issues 10(i) & (ii):

Adur District Council (00201)
Arun District Council (00451)
Chichester District Council (02947)
Crawley Borough Council (03002)
Horsham District Council (02914)
Mid Sussex District Council (02997)
Worthing Borough Council (03024)
Government Office for the South East (02944)
Geoffrey Sparks and Co (07504)
Jones Lang LaSalle (English Partnerships) (02951)
Adur Economic Partnership (00288)
Council for the Protection of Rural England (00355)
Sussex Association of Local Councils (00380)

Additional Participants for Issue 10(i) only:

East Sussex County Council (02998)
Highways Agency (00223)
South East England Regional Assembly (06397)
Federation of Sussex Amenity Societies (07481)
Metrobus (NR03495)
Stagecoach (NR00248)
Freight Transport Association (NR00171)

Additional Participants for Issue 10(ii) only:

Environment Agency (00219)
Christopher Maidment (individual) (07295)
Surrey & Sussex Healthcare NHS Trust (NR03519)
South East Water (NRSEW)
Portsmouth Water (00580)
Southern Water (00247)
Thames Water Property (03008)

Issue 11: Rural Areas

Does the Plan achieve the right balance between protecting environmental and visual assets and providing for the economic and social needs of rural areas?

To include:

(a) Are the Plan's policies on character and the environment too permissive or overly restrictive (including Policy CH6 (Strategic Gaps))?
(b) Should development other than for local needs be permitted in rural areas?
(c) Is sufficient attention paid in the Plan to agriculture and farm diversification?
(d) Is the Plan's stance on the development of brownfield sites in the countryside sufficiently clear?
(e) Should there be a more explicit strategy in the Plan for rural areas and their regeneration?

Participants for Issue 11

Arun District Council (00451)
Chichester District Council (02947)
Horsham District Council (02914)
Mid Sussex District Council (02997)

Government Office for the South East (02944)

Country Land and Business Assoc. (CLA) (07550)
Federation of Sussex Amenity Societies (07481)
Sussex Association of Local Councils (00380)
Sussex Rural Community Council (00394)

West Sussex Rural Forum (00439)

Barton Willmore (Bellway) (02885)
David Pantling (Laing Homes) (07623)
Henry Smith (07484)

Sigma Planning (Rydon Homes) (02983)
Town & Country Planning Solutions (Gleeson) (00468)

English Nature (00217)

Council for the Protection of Rural England (00355)
Sussex Downs Conservation Board (02911)
Sussex Wildlife Trust (00613)

Issue 12: Affordable Housing

Does the Plan place sufficient emphasis on the provision of affordable housing?

To include:

(a) Does the plan provide sufficient guidance to the districts on the proportion of affordable housing they should be negotiating? Should targets be added to Policy NE1?
(b) Is there a need to give more emphasis to provision for key workers and those with special housing needs?
(c) Should the Plan be more explicit about how affordable housing needs should be met in rural areas?
(d) Should there be a separate and stronger policy on affordable housing?

Participants for Issue 12

Adur District Council (00201)
Arun District Council (00451)
Chichester District Council (02947)
Crawley Borough Council (03002)
Horsham District Council (02914)
Mid Sussex District Council (02997)
Worthing Borough Council (03024)

Government Office for the South East (02944)

Chichester District Community Housing (07562)
Council for the Protection of Rural England (00355)

Charles Planning (Croudace) (02985)

House Builders Federation (07608)
Independent Town Planning Services (02934)
Inventures (NHS Executive SE Region) (03517)
Tetlow King (HA/RSL Consortium) (07558)

Sussex Association of Local Councils (00380)
Sussex Rural Community Council (00394)
West Sussex Economic Partnership(03529)

APPENDIX B

West Sussex Structure Plan 2001-2016

Examination in Public: Programme

	Morning	Afternoon
Week 1		
Tuesday 26 November	Issue 1: Regional Context	Issue 2: People, Homes and Jobs Issue 3: Locational Strategy
Wednesday 27 November	Issue 3: Locational Strategy (continued)	Issue 4: Urban Capacity
Thursday 28 November	Issue 5(i): Strategic Housing Requirement - General Issues Issue 5(ii): Strategic Housing Requirement - Crawley, Horsham and Mid Sussex	Issue 5 (ii): Strategic Housing Requirement - Crawley, Horsham and Mid S
Friday 29 November	Issue 5(iii): Strategic Housing Requirement - Chichester and Arun	Issue 5(iv): Strategic Housing Requirement - Adur and Worthing
Week 2		
Tuesday 3 December	Issue 6(i): Strategic Locations - Crawley	Issue 6(ii): Strategic Locations - Horsham
Wednesday 4 December	Issue 6(iii): Strategic Locations - East Grinstead	Issue 6(Iv): Strategic Locations - Burgess Hill
Thursday 5 December	Issue 7(i): Strategic Locations - Chichester City	Issue 7(ii): Strategic Locations - Chichester District east/Arun District
Friday 6 December	Issue 8: Release of Housing Land	(Reserved)
Week 3		
Tuesday 10 December	Issue 9(i): Strategic Employment Requirement - North East of the County	Issue 9(ii): Strategic Employment Requirement - Coastal Regeneration
Wednesday 11 December	Issue 10(i): Transport	Issue 10(i): Transport (continued) Issue 10(ii): Infrastructure
Thursday 12 December	Issue 11: Rural Areas	Issue 11: Rural Areas (continued)
Friday 13 December	Issue 12: Affordable Housing	

A - Additional Statement, **NS** - No Statement
OR - Original Representation, **S** - Statement, **WR** - Written representation

APPENDIX C

ISSUE 1& 2: THE REGIONAL CONTEXT & PEOPLE, HOMES AND JOBS

ORGANISATION	TYPE (see above)	REFERENCE
Adur District Council	S (Issue 1)	201/1
Adur District Council	S (Issue 2)	201/2
Arun District Council	S (Issue 1 & 2)	451/1/2/3/4/5/7/8/9/10/11/12
Chichester District Council	S (for all statements)	2947/CDC1
Chichester District Council	S (Issue 1)	2947/1/NP6
Chichester District Council	S (Issue 2)	2947/2
Crawley Borough Council	S (Issue 1)	3002/1
Crawley Borough Council	S (Issue 2)	3002/2
Horsham District Council	S (Issue 1)	2914/1
Horsham District Council	S (Issue 2)	2914/2
Mid Sussex District Council	S (issue 1)	2997/1
Mid Sussex District Council	OR (Issue 2)	2997/2/4/534/91/11OR
Worthing Borough Council	S (Issue 1)	3024/1
Worthing Borough Council	OR (Issue 2)	3024/2/12OR
East Sussex County Council	S (Issue 1)	2998/1
East Sussex County Council	S (Issue 2)	2998/2
Reigate and Banstead Borough Council	S (Issue 1 & 2)	197/12
South East England Regional Assembly	S (Issue 1)	6397/1
South East England Regional Assembly	S (Issue 2)	6397/2
Government Office for the South East	S (Issue 1)	2944/1
Government Office for the South East	S (Issue 2)	2944/2
Berkeley Strategic Land & Fletcher Trust	S (Issue 1)	7614/1
Berkeley Strategic Land & Fletcher Trust	S (Issue 2)	7614/2
Boyer Planning (George Wimpey)	OR (Issue 1)	7593/1OR
Boyer Planning (George Wimpey)	S (Issue 2)	7593/2
House Builders Federation	OR (Issue 1 & 2)	7608/1/2/5/6/7/10/11OR
Country Land and Business Association	OR (Issue 1)	7550/1OR
Country Land and Business Association	S (Issue 2)	7550/2
CADIA	OR (Issue 1 & 2)	7542/1/2/9/1OR
Sussex Enterprise	OR (Issue 1 & 2)	333/1/2/92OR
West Sussex Economic Partnership	S (Issue 1 & 2)	3529/1/2/9/11/12
Council for the Protection of Rural England	S (Issue 1)	355/1
Council for the Protection of Rural England	S (Issue 2)	355/2
Federation of Sussex Amenity Societies	S (Issue 1)	7481/1
Federation of Sussex Amenity Societies	S (Issue 2)	7481/2

A - Additional Statement, **NS** - No Statement
OR - Original Representation, **S** - Statement, **WR** - Written representation

Sussex Association of Local Councils	OR (Issue 1& 2)	380/1/2/3/4/5/7/8/9/10/11/12OR
Sussex Rural Community Council	OR (Issues 1& 2)	394/1/2/3/11/12OR
David Pantling	WR	7623/ALL
Jones Lang LaSalle	WR	NP2951/12
Planning for Economic Prosperity	WR	NPPEP/OR/12
Surrey County Council	WR (Issue 1)	NA2866/1
Surrey County Council	WR (Issue 2)	NA2866/2

ISSUE 3: THE LOCATIONAL STRATEGY

ORGANISATION	**TYPE (see above)**	**REFERENCE**
Adur District Council	S	201/3
Arun District Council	S	451/1/2/3/4/5/7/8/9/10/11/12
Chichester District Council	S	2947/CDC1
Chichester District Council	S	2947/3
Crawley Borough Council	S	3002/3
Horsham District Council	S	2914/3
Mid Sussex District Council	S	2997/3
Worthing Borough Council	S	3024/3
East Sussex County Council	S	2998/3
Government Office for the South East	S	2944/3
South East England Development Agency	NS	
Barton Willmore (Redrow, Pye)	S	3160/7620/3
Berkeley Strategic Land & Fletcher Trust	S	7614/3
Berkeley Strategic Land & Fletcher Trust	A	7614/3A
Boyer Planning	S	7593/3
David Pantling	S	7623/3
House Builders Federation	S	7608/3
Council for the Protection of Rural England	S	355/3
Country Land and Business Association	S	7550/3
Federation of Sussex Amenity Societies	S	7481/3
Sussex Association of Local Councils	OR	380/1/2/3/4/5/7/8/9/10/11/12OR
Sussex Rural Community Council	OR	394/1/2/3/11/12OR
Barton Willmore	WR	NP2885/3
Charles Planning Associates	WR	NP2985/3
DPDS Consulting	WR	NP7567/3
Jones Lang LaSalle	WR	NP2951/3
Miller Hughes	WR	NP2984/3
Southern Planning Practice	WR	NP7606/3
Surrey County Council	WR	NA2866/3

ISSUE 4: URBAN CAPACITY

A - Additional Statement, **NS** - No Statement
OR - Original Representation, **S** - Statement, **WR** - Written representation

ORGANISATION	TYPE (see above)	REFERENCE
Adur District Council	S	201/4
Arun District Council	S	451/1/2/3/4/5/7/8/9/10/11/12
Chichester District Council	S	2947/CDC1
Chichester District Council	S	2947/4
Crawley Borough Council	S	3002/4
Horsham District Council	S	2914/4
Mid Sussex District Council	S	2997/4
Worthing Borough Council	S	3024/4
Council for the Protection of Rural England	S	355/4
Federation of Sussex Amenity Societies	S	7481/4
Federation of Sussex Amenity Societies	A	7481/4/A
Federation of Sussex Amenity Societies	A	7481/4A2
Sussex Association of Local Councils	OR	380/1/2/3/4/5/7/8/9/10/11/12OR
Barton Willmore (Bellway, Wates)	S	2885/7611/4
Boyer Planning (Wimpey)	S	7593/4
Charles Planning (Croudace)	S	2985/4
David Pantling (Laing Homes)	OR	7623/4OR
House Builders Federation	S	7608/4
Independent Town Planning Services	S	2934/4
Philip Stone (RUKBA)	OR	6347/4OR
Government Office for the South East	S	2944/4
Berkeley Strategic	WR	NP7614/4
David Pantling	WR	7623/ALL
Richard Stubbs	WR	NP7509/4

ISSUE 5: STRATEGIC HOUSING REQUIREMENT

Participants attending all of 5i, 5ii, 5ii & 5iv

ORGANISATION	TYPE (see above)	REFERENCE
Adur District Council	S (i & iv)	201/5/14
Adur District Council	OR (ii & iii)	201/523/102OR
Arun District Council	S (i, ii, iii & iv)	451/1/2/3/4/5/7/8/9/10/11/12
Chichester District Council	S	2947/CDC1
Chichester District Council	S (i, ii, iii & iv)	2947/5/1234
Crawley Borough Council	S (i, ii, iii & iv)	3002/5/1234
Horsham District Council	S (i, ii, iii & iv)	2914/5/1234
Mid Sussex District Council	S (i & ii)	2997/5/12
Mid Sussex District Council	OR (iii & iv)	2997/2/4/534/91/11OR
Worthing Borough Council	S (i, ii, iii & iv)	3024/5/1234
Government Office for the South East	S (i, ii, iii & iv)	2944/5/1234

A - Additional Statement, **NS** - No Statement
OR - Original Representation, **S** - Statement, **WR** - Written representation

Berkeley Strategic Land & Fletcher Trust	S (i)	7614/5/1
Berkeley Strategic Land & Fletcher Trust	S (ii)	7614/5/2
Berkeley Strategic Land & Fletcher Trust	S (iii)	7614/3
Berkeley Strategic Land & Fletcher Trust	S (iv)	7614/4
House Builders Federation	S (i)	7608/5/1
House Builders Federation	S (ii, iii & iv)	7608/1/2/5/6/7/10/11OR
Lennon Planning (Hargreaves, Ward Homes)	S (i, ii, iii & iv)	3100/7586/5/1234
Richard Maile (Galliford, Try Homes)	S (i, ii, iii & iv)	5088/5/1234
Richard Stubbs	S (i)	7509/5/1
Richard Stubbs	OR (ii)	7509/5/2OR
Richard Stubbs	S (iii)	7509/5/3
Richard Stubbs	S (iv)	7509/5/4
Council for the Protection of Rural England	S (i, ii, iii & iv)	355/5/1234
Federation of Sussex Amenity Societies	S (i, ii, iii & iv)	7481/5/1234
Sussex Association of Local Councils	OR	380/1/2/3/4/5/7/8/9/10/11/12OR
Charles Planning Associates	WR	NP2985/5/1234
David Pantling	WR	7623/ALL
Miller Hughes	WR	NP2984/5
Southern Planning Practice	WR	NP7606/5

ISSUE 5ii only

ORGANISATION	**TYPE (see above)**	**REFERENCE**
Thames Water	NS	
Barton Willmore (NE Sector Crawley Consortium)	S	7622/5/2
David Pantling (RUKBA c/o Philip Stone)	S	7623/5/2
David Wilson Estates	OR	7595/5/3/6/2/8OR
DPDS (Countryside Properties)	S	7567/5/2
Jones Lang La Salle	S	2951/5/2
Barton Willmore	WR	NP2885/5/2
FPD Savills	WR	NP7448/5/2

ISSUE 5iii only

ORGANISATION	**TYPE (see above)**	**REFERENCE**
Chichester Society	S	3007/5/3
Felpham Association of Ratepayers	S	7598/5/3
Boyer Planning (George Wimpey)	S	7593/5/3
Cluttons (Church Commissioners)	S	4339/5/3
DLP (Hallam Land Management)	S	2986/5/3

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First City Tarmac)	S	7617/5/3/7/1
Westbury Homes/ Prowting Projects	S	3155/5/3

ISSUE 5iv only

ORGANISATION	TYPE (see above)	REFERENCE
Enplan (New Monks Farm)	S	7601/5/4/9/2
FPD Savills (W. Durrington Consortium)	S	7629/5/4
Westbury Homes / Prowting Projects	S	3155/5/4
Shoreham Port Authority	S	212/5/4
Worthing Green Party	OR	7479/5/4OR

ISSUE 6: THE STRATEGIC LOCATIONS (N E OF COUNTY & A23 CORRIDOR)

Participants attending all of 6i, 6ii, 6iii & 6iv

ORGANISATION	TYPE (see above)	REFERENCE
Crawley Borough Council	S (i, ii, iii & iv)	3002/6/1234
Crawley Borough Council	A	3002/6/1A
Horsham District Council	S (i, ii, iii & iv)	2914/6/1234
Mid Sussex District Council	S (i)	2997/6/1
Mid Sussex District Council	A (i)	2997/6/1A
Mid Sussex District Council	S (ii)	2997/6/2
Mid Sussex District Council	S (iii)	2997/6/3
Mid Sussex District Council	A (iii)	2997/6/3A
Mid Sussex Distrct Council	S (iv)	2997/6/4
Council for the Protection of Rural England	S (i, ii, iii & iv)	355/6/1234
Sussex Wildlife Trust	S (i, ii, iii & iv)	613/6/1234/7/12/11
Government Office for the South East	OR (i, ii, iii & iv)	2944/6/1234OR
Government Office for the South East	S (i)	2944/6/1
Government Office for the South East	S (iii)	2944/6/3
English Nature	OR (i, ii, iii & iv)	217/6/1234/11OR
Environment Agency	S (i, ii, iii & iv)	219/6/1234
Highways Agency	S (i)	223/6/1
Highways Agency	S (ii)	223/6/2
Highways Agency	S (iii)	223/6/3
Highways Agency	S (iv)	223/6/4
House Builders Federation	OR (i, ii, iii & iv)	7608/1/2/5/6/7/10/11OR
3 Counties Group	WR	NP6377/6
Chichester District Council	WR	2947/1/NP6
David Pantling	WR	7623/ALL
Mole Valley District Council	WR	NP195/6
Star Planning and Development	WR	NP/NRSPD/6
Star Planning and Development	WR	NP/NRSPD/6A

ISSUE 6i only

ORGANISATION	TYPE (see above)	REFERENCE
Community Against Urban Sprawl	S	NRCAUS/6/1

A - Additional Statement, **NS** - No Statement
OR - Original Representation, **S** - Statement, **WR** - Written representation

Horsham Society	S	3025/6/1
Ifield Village Association	S	NRIVA/6/1
Keep Rusper Green ACG	S	3020/6/1
Rusper Parish Council	S	7375/6/1
FPD Savills (Crest Strategic and Mr Calvert)	S	7602/6/1
FPD Savills (Crest Strategic and Mr Calvert)	A	7602/6/1A
FPD Savills (Crest Strategic and Mr Calvert)	A	7602/6/1B
George Wimpey UK	S	7580/6/1
George Wimpey UK	A	7580/6/1A
Hillreed Developments Ltd	OR	3099/6/1OR
Jones Lang LaSalle	S	2951/6/1
Lamont Planning	S	7626/6/1
Lamont Planning	A	7626/6/1A
Richard Maile (Galliford, Try)	S	5088/6/1
P J Hodskinson (Squires Bridge Homes)	OR	7594/6/12OR
Barton Willmore	WR	NP7613/6/1
Berkeley Strategic Land	WR	NP7614/6/1
DPDS	WR	NP7600/6/1
KTI Energy Limited	WR	NPKTI/6/1
Surrey County Council	WR	NA2866/6/123

ISSUE 6ii only

ORGANISATION	**TYPE (see above)**	**REFERENCE**
Southwater Action Group	S	2929/6/2
Southwater and Broadbridge Heath Parish Council	S	2865/6/2
Weald Vale Association	S	526/6/2
Weald Vale Association Ltd	S	7993/6/2
Berkeley Strategic Land & Fletcher Trust	S	7614/6/2
David Wilson Estates	OR	7595/5/3/6/2/8OR
DPDS (Countryside Properties)	S	7567/6/2
Independent Town Planning Services	S	2934/6/2
Independent Town Planning Services	A	2934/6/2d
P J Hodskinson	OR	7594/6/12OR
George Wimpey	WR	NP7580/6/2
Surrey County Council	WR	NA2866/6/123

A - Additional Statement, **NS** - No Statement
OR - Original Representation, **S** - Statement, **WR** - Written representation

ISSUE 6iii only

ORGANISATION	TYPE (see above)	REFERENCE
East Sussex County Council	S (iii & iv)	2998/6/34
East Sussex County Council	A	2998/6/3A
East Sussex County Council	A	2998/6/3B
Tandridge District Council	S	198/6/3
Tandridge District Council	A	198/6/3A
Association of Imberhorne Residents	S	7430/6/3
Copthorne Village Association	S	3547/6/3
East Grinstead Society	S	558/6/3
East Grinstead Society	A	558/6/3A
East Grinstead Society	A	558/6/3B
East Grinstead Town Council	S	4487/6/3
Barton Willmore (Bryant, Persimmon, Rialto)	S	7613/6/3
Barton Willmore (Bryant, Persimmon, Rialto)	A	7613/6/3A
Barton Willmore (Bryant, Persimmon, Rialto)	A	7613/6/3B
Crest Strategic Projects	S	3153/6/3
Lennon Planning	S	3129/6/3
National Trust	S	626/6/3
3 Counties	WR	NP6377/6/3
3 Counties	WR	NP6377/6/3A
A J Lane	WR	NPAJL/6/3
A J Lane	WR	NPAJL/6/3A
Berkeley Strategic	WR	NP7614/6/3
Brian Harradine	WR	NPBH/6/3
Edward Lightburn	WR	NPEL/6/3
Forest Row Parish Council	WR	NPFRPC/6/3
Lamont Planning	WR	NP7626/6/3
Miller Hughes	WR	NP2984/6/3/9
Miller Hughes	WR	NP2984/6/3/4
Nigel Peters	WR	NPNP/6/3
Nigel Peters	WR	NPNP/6/3A
Robert Evans	WR	NPRE/6/3
Surrey County Council	WR	NA2866/6/123
Wealden District Council	WR	NA200/6/3

ISSUE 6iv only

ORGANISATION	TYPE (see above)	REFERENCE
East Sussex County Council	S	2998/6/34
Christopher Maidment	S	7295/6/4
Christopher Maidment	A	7295/6/4A
Christopher Maidment	A	7295/6/4B
Greenfield Guardians	S	3798/6/4
Greenfield Guardians	A	3798/6/4A
Hurstpierpoint Historical Society	S	7379/6/4
Speer Dade	S	7426/6/4
David Pantling	S	7623/6/4
DPDS (Bryant Homes)	S	7600/6/4

Miller Hughes (W Burgess

A - Additional Statement, **NS** - No Statement
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Hill Company)	S	2984/6/4
Miller Hughes (W Burgess Hill Company)	A	2984/6/4A
Miller Hughes (W Burgess Hill Company)	A	2984/6/4/10/2
Parker Dann (Phelan Trust)	OR	2991/6/4OR
Anthony Padfield Town Planning (Strategic Land Investment)	S	7976/6/4
Berkeley Strategic	WR	NP7614/6/4
Lewes District Council	WR	NA194/6/4

ISSUE 7: THE STRATEGIC LOCATIONS (COASTAL AREA)

Participants attending both 7i and 7ii

ORGANISATION	**TYPE (see above)**	**REFERENCE**
Arun District Council	S (i)	451/1/2/3/4/5/7/8/9/10/11/12
Arun District Council	S (ii)	451/7/2
Chichester District Council	S	2947/CDC1
Chichester District Council	S (i &ii)	2947/7/12
Chichester District Council	A (i)	2947/7/1A
Government Office for the South East	S (i & ii)	2944/7/12
English Nature	S (i & ii)	217/7/12
Environment Agency	S (i & ii)	219/7/12
Highways Agency	S (i)	223/7/1
Highways Agency	S (ii)	223/7/2
Sussex Wildlife Trust	S (i & ii)	613/6/1234/7/12/11
Barton Willmore (Redrow, Wates)	S (i & ii)	3160/7611/7/12
Barton Willmore (Redrow, Wates)	A (i & ii)	3160/7611/7/12A
Charles Planning (Croudace)	S (i & ii)	2985/7/12
Charles Planning (Swan Hill)	S (i & ii)	2985/7633/7/12
Cluttons (Church Commissioners)	S (i)	4339/7/1
Cluttons (Church Commissioners)	S (ii)	4339/7/2
House Builders Federation	OR (i & ii)	7608/1/2/5/6/7/10/11OR
Chichester District Community Housing	OR (i & ii)	7562/7/12OR
Chichester Friends of the Earth	OR (i & ii)	7514/7/12OR
Council for the Protection of Rural England	S (i & ii)	355/7/12
Council for the Protection of Rural England	A (i & ii)	355/7/12A
Boyer Planning	WR	NP7593/7
David Pantling	WR	7623/ALL
Lennon Planning	WR	NP3100/7/1234
Louis Beaton	WR	NP4205/7
Richard Maile	WR	NP5088/7/1234

A - Additional Statement, **NS** - No Statement
OR - Original Representation, **S** - Statement, **WR** - Written representation

ISSUE 7i only

ORGANISATION	TYPE (see above)	REFERENCE
Chichester Harbour Conservancy	S	208/7/1
Chichester Harbour Conservancy	A	208/7/1A
Chichester Residents Association Co-ord Group	S	5338/7/1
Chichester Society	S	3007/7/1
Manhood Peninsula Partnership	S	7547/7/1
Parishes SW Chichester (Apuldram / Fishbourne / Donnington / Chi City)	S	2887/7/1
Berkeley Strategic	S	7614/7/1
Berkeley Strategic	A	7614/7/1B
First City (Tarmac)	S	7617/5/3/7/1
First City (Tarmac)	A	7617/7/1A
Hawthorne Kamm (Linden Homes)	S	7597/7/1
Kris Mitra Associates	NS	
Southern Planning Practice	S	7606/7/1
Southern Planning Practice	A	7606/7/1A
English Heritage	S	216/7/1

ISSUE 7ii only

ORGANISATION	TYPE (see above)	REFERENCE
Five Villages Society	S	614/7/2
Bognor Regis Civic Society	S	NR/BRCS/7/2
Bognor Regis Civic Society	A	NR/BRCS/7/2A
Mr Derek Waller	S	3672/7/2
Sussex Association of Local Councils	NS	
Tangmere Parish Council	S	7515/7/2
Richard Maile (Mr D Heaver)	S	8094/7/2
Richard Maile	A	5088/7/2A
Enplan (Antony Greenwood)	S	7624/7/2
Independent Town Planning Services	OR	2934/7/2OR
Independent Town Planning Services	OR	2934/7/2OR2
Berkeley Strategic Land	WR	NP7614/7/2
Chichester Society	WR	NP3007/7/2
Hallam Land Management	WR	NA7535/7/2
R L Stubbs	WR	NP7509/7/2
WSP Development	WR	NPWSP/7/2

ISSUE 8: THE RELEASE OF HOUSING LAND

ORGANISATION	TYPE (see above)	REFERENCE
Adur District Council	S	201/8
Arun District Council	S	451/1/2/3/4/5/7/8/9/10/11/12
Chichester District Council	S	2947/8
Chichester District Council	S	2947/CDC1
Crawley Borough Council	S	3002/8
Horsham District Council	S	2914/8
Mid Sussex Council	S	2997/8
Worthing Borough Council	S	3024/8
Government Office for		

A - Additional Statement, **NS** - No Statement
OR - Original Representation, **S** - Statement, **WR** - Written representation

the South East	S	2944/8
Council for the Protection of Rural England	S	355/8
Federation of Sussex Amenity Societies	S	7481/8
Sussex Association of Local Councils	OR	380/1/2/3/4/5/7/8/9/10/11/12OR
Barton Willmore (Bellway)	S	2885/8
Broadway Malyan	S	NRBM/8
Charles Planning (Croudace)	S	2985/8
Cluttons (Church Commissioners)	S	4339/8
David Pantling (Laing Homes)	S	7623/8
David Pantling (Laing Homes)	A	7623/ALL
David Wilson Esates	OR	7595/5/3/6/2/8OR
DLP Consultants (Hallam Land Management)	S	2986/8
House Builders Federation	S	7608/8
Lennon Planning	OR	3100/8OR
Town & Country Planning Solutions (Gleeson)	OR	468/8/11OR
Berkeley Strategic Land	WR	NP7614/8

ISSUE 9: STRATEGIC EMPLOYMENT REQUIREMENT

Participants attending both 9i and 9ii

ORGANISATION	**TYPE (see above)**	**REFERENCE**
Government Office for the South East	S (i & ii)	2944/9/12
South East Development Agency	NS	
Sussex Association of Local Councils	OR (i & ii)	380/1/2/3/4/5/7/8/9/10/11/12OR
Council for the Protection of Rural England	S (i & ii)	355/9/12
Sussex Enterprise	OR (i & ii)	333/1/2/92OR
West Sussex Economic Partnership	S (i & ii)	3529/1/2/9/11/12
Federation of Sussex Amenity Societies	S (i & ii)	7481/9/12
Federation of Sussex Amenity Societies	A	7481/9/2A
David Pantling	WR	7623/ALL
George Wimpey	WR	NP7580/9
Planning for Economic Properity	WR	NPPEP/OR9

ISSUE 9i only

ORGANISATION	**TYPE (see above)**	**REFERENCE**
Crawley Borough Council	S	3002/9/1
Horsham District Council	S	2914/9/1
Mid Sussex District Council	S	2997/9/1
BAA London Gatwick	S	3064/9/1
CADIA	OR	7542/1/2/9/1/OR
DPDS (Asiacom Holdings)	S	7596/9/1
Jones Lang LaSalle	S	2951/9/1
Jones Lang LaSalle	A	2951/9/1A
Berkeley Strategic Land	WR	NP7614/9/1

A - Additional Statement, **NS** - No Statement
OR - Original Representation, **S** - Statement, **WR** - Written representation

Surrey County Council	WR	NA2866/9/1

ISSUE 9ii only

ORGANISATION	**TYPE (see above)**	**REFERENCE**
Adur District Council	S	201/9/2
Arun District Council	S	451/1/2/3/4/5/7/8/9/10/11/12
Chichester District Council	S	2947/CDC1
Chichester District Council	S	2947/9/2
Worthing Borough Council	S	3024/9/2
Selsey Town Council	S	2909/9/2
Adur Economic Partnership	OR	288/9/2/10/12OR
Shoreham Port Authority	S	212/9/2
Shoreham Airport	OR	325/9/2OR
Enplan (New Monks Farm)	S	7601/5/4/9/2

ISSUE 10: TRANPORT AND INFRASTRUCTURE

Participants attending both 10i and 10ii

ORGANISATION	**TYPE (see above)**	**REFERENCE**
Adur District Council	S (i)	201/10/1
Adur District Council	OR (ii)	201/523/102OR
Arun District Council	S (i & ii)	451/1/2/3/4/5/7/8/9/10/11/12
Chichester District Council	S	2947/CDC1
Chichester District Council	S (i & ii)	2947/10/12
Crawley Borough Council	S (i)	3002/10/12
Crawley Borough Council	S (ii)	3002/10/2
Horsham District Council	S (i & ii)	2914/10/12
Mid Sussex District Council	S (i & ii)	2997/10/12
Worthing Borough Council	S (i & ii)	3024/10/12
Government Office for the South East	S (i & ii)	2944/10/12
Geoffrey Sparks and Co	OR (i & ii)	7504/10/12OR
Jones Lang LaSalle	S (i & ii)	2951/10/12
Adur Economic Partnership	OR (i & ii)	288/9/2/10/12OR
Council for the Protection of Rural England	S (i & ii)	355/10/12
Sussex Association of Local Councils	OR (i & ii)	380/1/2/3/4/5/7/8/9/10/11/12OR
Chichester District Committee, CPRE	WR	NPCDSC/10/12
David Pantling	WR	7623/ALL
Steve Comber	NPSC/10	

ISSUE 10i only

ORGANISATION	**TYPE (see above)**	**REFERENCE**
East Sussex County Council	S	2998/10/1
Highways Agency	S	223/10/1
South East Regional Assembly	S	6397/10/1
Federation of Sussex Amenity Societies	S	7481/10/1

A - Additional Statement, **NS** - No Statement
OR - Original Representation, **S** - Statement, **WR** - Written representation

Metrobus	S	NR03495/10/1
Stagecoach	NS	
Freight Transport Association	NS	
Barton Willmore	WR	NP2885/10/1
Berkeley Strategic	WR	NP7614/10/1
Berkeley Strategic	WR	NP7614/10/1A
Christopher Maidment	WR	NP7295/10/1A
Strategic Rail Authority	WR	NP3496/10/1
Surrey County Council	WR	NA2866/10/1

ISSUE 10ii only

ORGANISATION	**TYPE (see above)**	**REFERENCE**
Environment Agency	S	219/10/2
Christopher Maidment	S	7295/10/2
Mid Sussex Primary Care Trust	S	MSHPC/10/2
Surrey and Sussex Healthcare NHS Trust	NS	
South East Water	S	NRDL/10/2
Portmouth Water	OR	580/10/2OR
Southern Water	OR	247/10/2OR
Thames Water Property	S	3008/10/2
Miller Hughes	WR	2984/6/4/10/2

ISSUE 11: RURAL AREAS

ORGANISATION	**TYPE (see above)**	**REFERENCE**
Arun District Council	S	451/1/2/3/4/5/7/8/9/10/11/12
Chichester District Council	S	2947/CDC1
Chichester District Council	S	2947/11
Horsham District Council	S	2914/11
Mid Sussex District Council	OR	2997/2/4/534/91/11OR
Government Office for the South East	S	2944/11
Country Land and Business Association	S	7550/11
Federation of Sussex Amenity Societies	S	7481/11
Federation of Sussex Amenity Societies	A	7481/11A
Federation of Sussex Amenity Societies	A	7481/11B
Sussex Association of Local Councils	OR	380/1/2/3/4/5/7/8/9/10/11/12OR
Sussex Rural Community Council	OR	394/1/2/3/11/12OR
West Sussex Economic Partnership	S	3529/1/2/9/11/12
West Sussex Rural Forum	S	439/11
Barton Willmore (Bellway)	S	2885/11
David Pantling (Laing Homes)	S	7623/11
Henry Smith	S	7484/11
House Builders Federation	OR	7608/1/2/5/6/7/10/11OR
Sigma Planning (Rydon Homes)	S	2983/11
Town & Country Planning Solutions (Gleeson)	OR	468/8/11OR

A - Additional Statement, **NS** - No Statement
OR - Original Representation, **S** - Statement, **WR** - Written representation

English Nature	OR	217/6/1234/11OR
Council for the Protection of Rural England	S	355/11
Sussex Downs Conservation Board	S	2911/11
Sussex Wildlife Trust	S	613/6/1234/7/12/11
David Pantling	WR	7623/ALL
Miller Hughes	WR	NP2984/11
Southern Planning Practice	WR	NP7606/11

ISSUE 12: AFFORDABLE HOUSING

ORGANISATION	**TYPE (see above)**	**REFERENCE**
Adur District Council	S	201/12
Arun District Council	S	451/1/2/3/4/5/7/8/9/10/11/12
Chichester District Council	S	2947/CDC1
Chichester District Council	S	2947/12
Crawley Borough Council	S	3002/12
Horsham District Council	S	2914/12
Mid Sussex District Council	S	2997/12
Worthing Borough Council	OR	3024/2/12OR
Government Office for the South East	S	2944/12
Chichester District Community Housing	OR	7562/7/12OR
Council for the Protection of Rural England	S	355/12
Charles Planning (Croudace)	S	2985/12
House Builders Federation	S	7608/12
Independent Town Planning Services	S	2934/12
Inventures (NHS Executive SE Region)	S	3517/12
Tetlow King (HA/RSL Consortium)	S	7558/12
Sussex Association of Local Councils	OR	380/1/2/3/4/5/7/8/9/10/11/12OR
Sussex Rural Community Council	OR	394/1/2/3/11/12OR
West Sussex Economic Partnership	S	3529/1/2/9/11/12
Cluttons	OR	4339/12OR
Berkeley Strategic Land	WR	NP7614/12
David Pantling	WR	7623/ALL

REPRESENTATIONS ON POLICIES NE1, NE3 & LOC 1

ORGANISATION	**REFERENCE**
EiP Office letter	As.l.all.dp8.091202
West Sussex County Council	WSCC/NE1, 3
West Sussex County Council	WSCC/LOC1
West Sussex County Council	WSCC/NE1, 4
Broadway Malyan	NRBMP/NE1,3
Tandridge District Council	198/LOC1
Adur District Council	201/NE1, 3
Chichester Harbour Conservancy	208/LOC1
Town & Country Planning Solutions	468/NE1, 3/LOC1
Independent Town Planning Services	2934/LOC1

A - Additional Statement, **NS** - No Statement
OR - Original Representation, **S** - Statement, **WR** - Written representation

Government Office for the South East	2944/NE1,3
Chichester District Council	2947/NE/LOC1
Miller Hughes	2984/LOC1
Charles Planning Associates	2985/NE1,3
Development Land & Planning	2968/NE1,3
Mid Sussex District Council	2997/LOC1
Mid Sussex District Council	2997/NE1,3
Crawley Borough Council	3002/LOC1/NE1,3
Crest Strategic Projects	3153/LOC1
Barton Willmore	3160/LOC1
The Greenfield Guardians	3798/LOC1
Richard Maile	5088/LOC1
Richard Maile	5088/LOC1A
Christopher Maidment	7295/LOC1
Rusper Parish Council	7375/LOC1
Speer Dade	7426/LOC1
Association of Imberhorne Residents	7430/LOC1
Forum of Arun District Amenity Groups	7481/LOC1
Federation of Sussex Amenity Societies	7481/NE1,3
Richard Stubbs	7509/LOC1
DPDS Consulting	7567/LOC1
Felpham Association of Ratepayers	7578/LOC1
Hawthorne Kamm	7597/LOC1
FPD Savills	7602/LOC1
Southern Planning Practice	7606/LOC1
House Builders Federation	7608/NE1,3
Barton Willmore	7622/LOC1
David Pantling Consultancy	7623/NE1,3
David Pantling Consultancy	7623/LOC1
Lamont Planning Associates	7626/LOC1

A - Additional Statement, **NS** - No Statement
OR - Original Representation, **S** - Statement, **WR** - Written representation

B - Background Paper

WEST SUSSEX COUNTY COUNCIL STATEMENTS AND BACKGROUND DOCUMENTS

ISSUE NUMBER	TYPE (see above)	REFERENCE
Issue 1	S	WSCC/1
Issue 2	S	WSCC/2
Issue 2	B	WSCC/2B
Issue 3	S	WSCC/3
Issue 3	A	WSCC/3A
Issue 4	S	WSCC/4
Issue 4	B	WSCC/4B
Issue 5	S (i, ii, iii, iv)	WSCC/5/1234
Issue 6	S (i, ii, iii, iv)	WSCC/6/1234
Issue 6	B (i, ii, iii, iv)	WSCC/6/1234B
Issue 6(iii)	A	WSCC/6/3A
Issue 7	S (i, ii)	WSCC/7/12
Issue 7	B (i, ii)	WSCC/7/12B
Issue 8	S	WSCC/8
Issue 8	B	WSCC/8B
Issue 9 (i)	S (i)	WSCC/9/1
Issue 9 (i)	B (i)	WSCC/9/1B
Issue 9 (ii)	S (ii)	WSCC/9/2
Issue 9 (ii)	B (ii)	WSCC/9/2B
Issue 10 (i)	S (i)	WSCC/10/1
Issue 10 (i)	A (i)	WSCC/10/1A
Issue 10 (ii)	S (ii)	WSCC/10/2
Issue 11	S	WSCC/11
Issue 12	S	WSCC/12

APPENDIX D

EiP OFFICE LIBRARY DOCUMENTS

[Suffixes: CD= Core document (referred to in SP documentation; PA= Panel Addition; AD=Additional Documentation (by participants)]

WEST SUSSEX COUNTY COUNCIL DOCUMENTS

WS0001/CD	West Sussex Structure Plan 1993
WS0002/CD	West Sussex Structure Plan Third Review 1998 (not formally adopted)
WS0003/CD	"Shaping our Future": The West Sussex Structure Plan Proceedings of the Members' Conferences and Stakeholders' Working Conferences (2000)
WS0004/CD	"The Choices Ahead": Public Consultation Document (2000)
WS0005/CD	"Shaping our Future": A Review of Comments Received on the Public Consultation Document (2000)
WS0006/CD	West Sussex Structure Plan Third Review 1998 – Public Consultation – Final Report by MVA (2000)
WS0007/CD	"Environmental Capacity in West Sussex", Third Review Background Paper (1996)
WS0008/CD	Sustainable Development Appraisal of the Deposit Draft Structure Plan 2001 – 2016.Baker Associates
WS0009/CD	An Archaeology Strategy for West Sussex (1995)
WS0010/CD	Statement of Publicity, Consultations and Considerations of Representations on the Deposit Draft Structure Plan (2001 – to be published)
WS0011/CD	A Nature Conservation Strategy for West Sussex (1991)
WS0012/CD	A Guide to Nature Conservation and Planning in West Sussex – planning for biodiversity (2000)
WS0013/CD	A Rural Strategy for West Sussex (1993)
WS0014/CD	A Coastal Strategy for West Sussex (1994)
WS0015/CD	A Strategy for the West Sussex Local Economy 2001 – 2003 (2001)
WS0016/CD	West Sussex Sustainable Development Strategy (2000)
WS0017/CD	Landscape Assessment of West Sussex Part 1 (1995)
WS0018/CD	Landscape Assessment of West Sussex Part 2: Rural Landscape Strategy (1999)
WS0019/CD	Landscape Assessment of West Sussex Part 3: Landscape Management Guidelines (1995)
WS0020/CD	Sites of Nature Conservation Importance (2001)
WS0021/CD	The Provision of Service Infrastructure related to new development in West Sussex – Part 1 (1999)
WS0022/CD	"Mind the Gap II" - Technical Report on Strategic Gaps (2001)
WS0023/CD	"Employment Forecasts for West Sussex" - Cambridge Econometrics (2000) + Data Report
WS0024/CD	"Employment Implications of Gatwick Airport" - Cambridge Econometrics (1999)
WS0025/CD	Joint Study of Crawley / Gatwick Area and the Sussex Coast - Cambridge Econometrics (2001)
WS0026/CD	"The Potential Economic Impact of Evolving ICT Technologies" - Cambridge Econometrics (2000)
WS0027/CD	"An Evaluation of Urban Capacity in West Sussex", Final Report - Chesterton Planning and Economics (2000)
WS0028/CD	Gatwick Airport Sustainable Development Strategy - BAA Gatwick (2000)
WS0029/CD	Legal Agreement between BAA Gatwick, Crawley BC and WSCC (2001)
WS0030/CD	West Sussex Commercial and Industrial Development Survey 1 January 2000 (2001)
WS0031/CD	West Sussex Minerals Local Plan Deposit Draft incorporating proposed modifications (2000)
WS0032/CD	"Waste Planning in West Sussex: An Issues Paper" Pre-Deposit Consultation Document (2000)"
WS0033/CD	Waste Disposal Plan (1995)
WS0034/CD	The Local Transport Plan for West Sussex (2000)
WS0035/CD	The Local Transport Plan for West Sussex Annual Progress Report (2001)
WS0036/CD	Stepping Ahead - A Pedestrian Strategy for West Sussex (2000)
WS0037/CD	Pedalling Ahead - A Cycling Strategy for West Sussex (2000)
WS0038/CD	A Rural Transport Plan for West Sussex (2000)
WS0039/PA	Fastway - Scheme Appraisal Report Executive Summary
WS0040/AD	Map detailing constraints on development in West Sussex

WS0041/AD West Sussex Structure Plan Second Review: Replacement Plan 1991. Examination in Public Panel Report
WS0042/AD West Sussex Structure Plan Deposit Draft Third Review May 1997. Examination in Public Panel Report
WS0043/AD "Shaping our Future" The West Sussex Structure Plan Examination in Public: Issues and Participants - July 2002
WS0044/AD "Shaping our Future" The West Sussex Structure Plan Pre Examination in Public Proposed Changes - August 2002
WS0045/AD "Shaping our Future" The West Sussex Structure Plan Deposit Draft incorporating the Proposed Changes - August 2002
WS0046/AD "Shaping our Future" The West Sussex Structure Plan Representations on the Proposed Changes and Initial Officer Response - October 2002
WS0047/AD Employment Forecasts for West Sussex. A Data Report submitted to West Sussex County Council. Cambridge Econometrics. June 2002

GOVERNMENT DOCUMENTS
G0001/CD PPG1: General Policies and Principles (1997)
G0002/CD PPG3: Housing (2000)
G0003/CD PPG4: Industrial and Commercial Development and Small Firms (1992)
G0004/CD PPG6: Town Centres and Retail Developments (1996)
G0005/CD PPG7: The Countryside - Environmental Quality and Economic and Social Development (1997)
G0006/CD PPG8: Telecommunications (2001)
G0007/CD PPG9: Nature Conservation (1994)
G0008/CD PPG10: Planning and Waste Management (1999)
G0009/CD PPG11: Regional Planning (2000)
G0010/CD PPG12: Development Plans (1999)
G0011/CD PPG13: Transport (2001)
G0012/CD PPG14: Development on Unstable Land (1990)
G0013/CD PPG15: Planning and the Historic Environment (1994)
G0014/CD PPG16: Archaeology and Planning (1990)
G0015/CD PPG17: Sport and Recreation (1991)
G0016/CD PPG20: Coastal Planning (1992)
G0017/CD PPG21: Tourism (1992)
G0018/CD PPG22: Renewable Energy (1993)
G0019/CD PPG23: Planning and Pollution Control (1994)
G0020/CD PPG24: Planning and Noise (1994)
G0021/CD PPG25: Development and Flood Risk (2001)
G0022/CD RPG9: Regional Planning Guidance for the South East (2001)
G0023/CD MPG6: Guidelines for Aggregates Provision in England (1994)
G0024/CD "The Regional Sustainable Development Framework, A better Quality of Life in the South East" - SEERA (2001)
G0025/CD Development of a Renewable Energy Assessment and Targets for the South East - Government Office for the South East (2001)
G0026/CD Preparing for the Impacts of Climate Change SCOPAC (2001) + CD ROM
G0027/CD Department of Environment, Transport and Regions: "Structure Plans - A Guide to Procedures"
G0028/AD 2000 Regional Housing Statement. Government Office for the South East, Housing Corporation South East
G0029/AD A Public Service Agreement for West Sussex. Assessment Framework for Targets: Affordable Housing 3rd Draft
G0030/AD West Sussex Planning & Social Housing Forum Minutes of meeting held on 23rd October 2001 at Arun District Council
G0031/AD "A Vision for Crawley" Crawley Borough Council
G0032/AD Economic Development Strategy 2000 - 2005. Crawley Borough Council
G0033/AD "Opening Doors" 2002 - 2007 Housing Strategy, Chichester District Council
G0034/AD Planning to Deliver: The managed release of housing sites: towards better practice. DTLR
G0035/PA The Future Development of Air Transport in the United Kingdom: South East. Department for Transport. July 2002

G0036/PA The Future Development of Air Transport in the United Kingdom: South East Questionnaire. Dept. for Transport. July 2002
G0037/AD Arun District Local Plan: Second Review Revised Deposit Draft Inspectors Report May 2002
G0038/AD Arun District Local Plan: Second Review Revised Deposit Draft June 2002
G0039/AD Arun District Local Plan: Second Review Revised Deposit Draft. Proposals Map and Insets June 2002
G0040/AD Arun District Local Plan: Proposed Modifications and Statement of Reasons. September 2002
G0041/PA South Coast Corridor Multi-Modal Study Final Report. Government Office for the South East. August 2002
G0042/AD Horsham District Local Plan Position Statement 2001 - 2006
G0043/AD Horsham District Local Plan. Housing Development Monitoring Report 1st July 2001 - 30th June 2002. October 2002
G0044/PA Hampshire County Structure Plan 1996 - 2011 (Review) Supplementary Planning Guidance Implementing Policy H4
G0045/AD Housing Supply in the South East. South East England Regional Assembly Planning Committee.
G0046/AD Draft Regional Economic Strategy. South East Regional Assembly. September 2002
G0047/AD The European Spatial Development Perspective (E.S.D.P). European Consultative Forum on Environment and Sustainable Development
G0048/AD Highways Agency News Release 16th October 2002

OTHER DOCUMENTS
O0001/CD West Sussex Renewable Energy Resource Report - Halcrow Fox (1995)
O0002/CD Biodiversity Action Plans - 1997 to 2001, Sussex Biodiversity Partnership
O0003.1/CD Local Environmental Action Plans (LEAP): Rivers Adur and Ouse (2000). Environment Agency
O0003.2/CD Local Environmental Action Plans (LEAP): River Arun and Western Streams (2000) Environment Agency
O0003.3/CD Local Environmental Action Plans (LEAP): River Mole (2000). Environment Agency
O0003.4/CD Local Environmental Action Plans (LEAP): River Mole (2000). Environment Agency
O0004/PA Railtrack 2001 Network Management Statement Part One: Maintaining and Renewing Britain's rail infrastructure
O0005/PA Railtrack 2002 Network Management Statement: Volume 1 Nation Plans
O0006/PA Railtrack 2002 Network Management Statement: Volume 2 Route Plans
O0007/PA West Sussex Bus Information
O0008/PA “Room to Grow” Sussex Enterprise
O0009/PA “From Crisis to Cutting Edge” Regional Transport Strategy Consultation Draft. SEERA June 2002
O0010/PA Map detailing Panel Tour - July 2002
O0011/AD Regional Economic Strategy 2002 Consultation Document. South East England Development Agency. April 2002
O0012/AD Horsham District Urban Capacity Study for Horsham District Council. Llewelyn-Davies
O0013/AD Ifield and Beyond: A taste of the Sussex Countryside. Horley Crawley Project

APPENDIX E

LIST OF ABBREVIATIONS

AEP	Adur Economic Partnership
CADIA	Business Association for Sussex and Surrey
CAUS	Campaign Against Urban Sprawl
CLA	Country Land and Business Association
CPRE	Council for the Protection of Rural England
DDSP	Deposit Draft Structure Plan
DPDS	Development Planning & Design Services Group Ltd
EA	Environment Agency
EM	Explanatory Memorandum
EiP	Examination in Public
FSAS	Federation of Sussex Amenity Societies
GOSE	Government Office for the South East
HBF	House Builders Federation
ITPS	Independent Town Planning Services
LDF	Local Development Framework
LP	Local Plan
LPA	Local Planning Authority
LTP	Local Transport Plan
PAER	Priority Area for Economic Regeneration
PDL	Previously Developed Land
PPG	Planning Policy Guidance Note
PMM	Plan, Monitor, Manage
RPG	Regional Planning Guidance
RTS	Regional Transport Strategy
SAG	Southwater Action Group
SALC	Sussex Association of Local Councils
SCMMS	South Coast Multi-Modal Study
SDPs	Strategic Development Principles
SERAS	South East and East of England Regional Air Services Study
SEERA	South East England Regional Assembly
SNCI	Site of Nature Conservation Importance
SRA	Strategic Rail Authority
SUDS	Sustainable Urban Drainage System
TUA	Typical Urban Area
UCS	Urban Capacity Study
WPA	Western Policy Area
WRR	Western Relief Road
WSCC	West Sussex County Council
WVAL	Weald Vale Association Ltd
WVA	Weald Vale Association

APPENDIX F

ISSUE 1: THE REGIONAL CONTEXT

The basic question that the Panel is asking is:
Will the plan, through its general thrust, achieve the relevant objectives of RPG?

ISSUE 2: PEOPLE, HOMES AND JOBS

The basic question that the Panel is asking is: Will the distribution of people, homes and jobs that will arise form the plan's strategy be such that currently perceived imbalances will, as far as it is possible, be addressed?

ISSUES 1 & 2

Matters for debate

1. In the context of RPG should the plan place greater emphasis on growth in the immediate Crawley/Gatwick area and less on the more peripheral parts of the Crawley/Gatwick/M23 sub regional area's zone of influence?

2. Is there too much reliance on linkages with the north east of the county to stimulate regeneration of the coastal areas, specifically the PAER, rather than on direct action in the coastal areas themselves?

3. Is concentration of development along the corridor linking Gatwick with the coast essential in the context of the RPG strategy or would it in effect detract from objectives relating to both areas?

4. Should the plan be more specific about the relationship between the Crawley/Gatwick area and regeneration of the coast and about how this relationship should be nurtured over the plan period?

5. Does the development strategy adequately reflect RPG's aims and objectives as far as they affect the rural parts of the county or are some of its needs being overlooked?

6. Is the plan placing too much emphasis on housing locations and not enough on meeting economic needs?

7. Having regard to all these matters, what conclusions can be drawn about the broad distribution of the overall housing requirement and employment floorspace between districts?

ISSUE 3: THE LOCATIONAL STRATEGY

The basic questions that the Panel is asking is:
Is the strategy what is needed to deliver the required quantum of development throughout the plan period and in the most appropriate locations?.

Matters for debate

1. Are there inconsistencies between the rationale behind the locational strategy and the content of policy LOC 1, particularly in respect of certain named locations?

2. Would giving more emphasis to small scale greenfield settlement extensions in appropriate locations provide greater flexibility and choice to supplement the strategic locations and aid rural regeneration, or would it simply dilute and weaken a strategy based on RPG and the advantages of concentration? Will they be needed to meet shortfalls in provision?

3. How should the plan deal with the continuing uncertainty regarding development in the north east sector of Crawley?

4. Given long lead in times and other possible problems is too much reliance being placed on the ability of the strategic locations to deliver?

5. If plan, monitor and manage is the right way to deal with contingency, in respect of policy LOC1 is the plan sufficiently clear on how the process will work?

6. In the designation of strategic locations is certainty better than flexibility and what should be the role of the strategic development principles contained in the CC's proposed changes?

ISSUE 4: URBAN CAPACITY

What is the realistic contribution of previously-developed land (PDL) to the overall housing requirement?

MATTERS FOR DISCUSSION:

(a) Is the Chesterton study sufficiently robust to provide the basis for the Plan's assumptions on PDL? How well does it relate to the Government's Best Practice guidance?

1. Does the study have any particular shortcomings beyond those applying generally to use of the Typical Urban Area method?

2. The Study is confined to the larger urban areas and to the use of a single methodology. Even if it is sufficient to provide guidance at a strategic level, is it reliable enough to provide figures on an individual District basis or for any more than a generalised overall indication of capacity?

3. The HBF suggest indeed that only limited weight can be attached to it, and that its various faults will all tend to overestimate the capacity. Why is this so, given the comments in `Tapping the Potential' as to the value of the method at a strategic level?

4. The HBF suggest that a definitive figure should be agreed between the parties. Bearing in mind shifts in the market and the perceptions of landowners, builders and housebuyers, how realistic is it that a meaningful single figure exists which could be agreed upon?

5. Given the various policy scenarios discussed by Chestertons, would a range of figures be more realistic, depending upon the various underlying assumptions, and if so is it reasonable for the SP to incorporate a single target figure within that range?

6. Residential development is not the only way in which PDL may be reused. Other uses will compete. Does this make a material difference to capacity for residential development?

(b) Should the overall PDL target be increased to 60% to accord with RPG?

7. What is the difference in practical terms between 57% and 60%

8. The figure of 57% is the arithmetical product of the figures for individual Districts - a target derived from a series of other targets. Is it appropriate for individual targets to be shown for each District, or should a single figure be applied to the County as a whole?

9. Even if it is essentially a target or aspiration, would there be any justification in increasing the figure unless it could be clearly shown that it would be capable of being achieved?

10. If a higher proportion of PDL is achieved in this plan period, would this simply reduce the potential for subsequent periods, by which time there may be greater acceptance of higher densities?

(c) Will acceptable and appropriate policies be in place to enable PDL targets to be met?

11. Which West Sussex LPs need material revision to their policies to enable them to encourage the efficient use of PDL, and what are the relevant timetables?

12. In considering a specific area of PDL, will maximising the amount of residential development on it always necessarily be the best way to ensure its sustainable development, and to what extent is the effect on the character of specific sites or settlements a consideration of similar weight?

13. Even if LP policies incorporate encouragement towards the efficient use of PDL, will this happen at the target rate without time for the education of and acceptance by the public? If this is necessary, how long should be allowed for it to take?

14. Does the target require action by other parties - for instance, the removal of VAT on refurbishment by the Government, assistance by Local Government with the cost of clearing up contaminated or difficult sites, or help with site assembly by LPAs? If so, is it likely that this will be done so as to enable PDL targets to be met?

15. How confident should each of the Districts be of achieving the target set out in Policy NE1?

ISSUE 5(i) STRATEGIC HOUSING REQUIREMENT

Does the Plan make adequate provision for residential development?

MATTERS FOR DISCUSSION

(a) Should figures be expressed as net rather than gross? Are the assumptions on which the difference is based robust? Is the relationship between the two sufficiently clear?

1. What is the practice elsewhere in ROSE, and, provided that explicit explanation of how the gross figure is derived, what harm would be done if West Sussex continue to use gross figures? [GOSE]
2. Have the County Council applied the same ratio to go from net to gross for each District? If so, is there a material difference which should be taken into account; and if not is this a matter which the Districts are in a better position to estimate, especially if the ratio may fluctuate more in future?
3. Which would be likely to be clearer to those using the Plan?
4. Whichever approach is taken, it will be essential to monitor the difference between net and gross. Does the Plan explain this adequately?

(b) Should there be a 10% flexibility allowance to take account of some allocations not coming forward?

5. Is the identification of such problems part of the purpose of the Plan, Monitor, Manage approach, and, if so, what would be the function of a flexibility allowance?
6. If an allowance should be made, should it apply only to the Strategic Locations, and should it be made in the SP or in LP?

(c) To what extent has there been an under-provision of housing in the period 1994-2001, and how should this be addressed?

7. Is the RPG figure intended to make an allowance for past deficiencies?
8. What was the scale of the previous shortfall?
9. Was the shortfall mainly in specific types of housing (in particular affordable housing), and if so should the SP aim for the RPG figure but try to increase the proportion of those types of which insufficient was provided before?
10. Would the policies of the present plan prevent the shortfalls of its predecessor occurring again?

ISSUE 5(ii) DISTRIBUTION OF THE STRATEGIC HOUSING REQUIREMENT FOR EACH DISTRICT

(CRAWLEY, HORSHAM AND MID SUSSEX)

Policy NE1:

District	Ann Av rate	Total dwells	PDL target
CRAWLEY	300	4,495	35%
HORSHAM	620	9,335	48%
MID SUSSEX	680	10,175	54%

Table 1:

District	Commitments (incl identified PDL)	Unidentified PDL	Small-scale greenfield	Large-scale greenfield	Total
CRAWLEY	3,465	1,030	0	0	4,495
HORSHAM	1,275	4,010	550	3,500	9,335
MID SUSSEX	2,410	4,415	350	3,000	10,175

(a) Will commitments and PDL yield the necessary provision in the early years of the Plan?

(c) What might realistically be achievable through small-scale greenfield extensions to the main towns in passenger transport corridors and to villages and small towns?

(d) Do the committed Strategic Locations [Crawley (north east sector) and south-west and south-east of Haywards Heath] offer more potential than is suggested in the Plan?

(b) Are the annual average build rates realistic and achievable? How do they relate to likely demand?

ISSUE 5(iii) DISTRIBUTION OF THE STRATEGIC HOUSING REQUIREMENT FOR EACH DISTRICT

(CHICHESTER & ARUN)

Policy NE1:

District	Ann Av rate	Total dwellings	PDL target
CHICHESTER	525	7,875	62%
ARUN	580	8,700	60%

Table 1:

District	Commitments (inc identified PDL)	Unidentified PDL	Small-scale greenfield	Large-scale greenfield	Total
CHICHESTER	1,975	4,010	625	1,265	7,875
ARUN	2,965	4,245	225	1,265	8,700

(a) Will commitments and PDL yield the necessary provision in the early years of the Plan?

(c) What might realistically be achievable through small-scale greenfield extensions to the main towns in passenger transport corridors and to villages and small towns?

(d) Do the committed Strategic Locations [east of Angmering and north of Bognor Regis] offer more potential than is suggested in the Plan?

(b) Are the annual average build rates realistic and achievable? How do they relate to likely demand?

ISSUE 5(iv) DISTRIBUTION OF THE STRATEGIC HOUSING REQUIREMENT FOR EACH DISTRICT

(ADUR & WORTHING)

Policy NE1

District	Ann av rate	Total	PDL Target
ADUR	115	1,745	100%
WORTHING	280	4,175	79%

Table 1:

District	Commitments (inc identified PDL)	Unidentified PDL	Small-scale greenfield	Large-scale greenfield	Total
ADUR	295	1,450	0	0	1,745
WORTHING	1,285	2,890	0	0	4,175

(a) Will commitments and PDL yield the necessary provision in the early years of the Plan?

(c) What might realistically be achievable through small-scale greenfield extensions to the main towns in passenger transport corridors and to villages and small towns?

(d) Does the committed Strategic Location [Worthing (Durrington)] offer more potential than is suggested in the Plan?

(b) Are the annual average build rates realistic and achievable? How do they relate to likely demand?

ISSUE 6: THE STRATEGIC LOCATIONS (NORTH EAST OF THE COUNTY & A23 ROAD/RAIL CORRIDOR)

ISSUE 6(i) WEST OF CRAWLEY - MATTERS FOR DISCUSSION

The basic question that the Panel is asking is:
Should we endorse the strategic locations as proposed, and if so do we agree with the numbers of dwellings and the timescale put forward? If we have concerns about the proposal how might the plan need to be changed so as to ensure that the required housing numbers are delivered?

Matters for debate

1. Is the CC underestimating the value of the countryside to the west of Crawley and features contained within it, and the ability to plan and build a strategic development which will not have an unacceptable impact on it?

2. Are there constraints and infrastructure requirements which are likely to delay development at this location and reduce its capacity in the plan period?

3. Do infrastructure requirements pose a threat to the delivery of affordable housing?

4. Is the choice of the west justified at this stage or should the plan identify the general location of Crawley for strategic development, leaving the local plans, through joint working and further assessment, to identify where development should be located?

ISSUE 6: THE STRATEGIC LOCATIONS (NORTH EAST OF THE COUNTY & A23 ROAD/RAIL CORRIDOR)

ISSUE 6(ii) WEST AND/OR SOUTH WEST OF HORSHAM - MATTERS FOR DISCUSSION

The basic question that the Panel is asking is:
Should we endorse the strategic locations as proposed, and if so do we agree with the numbers of dwellings and the timescale put forward? If we have concerns about the proposal how might the plan need to be changed so as to ensure that the required housing numbers are delivered?

Matters for debate

1. In reality are the various constraints in this location such that the scale of development proposed will not be achievable or will result in an unsatisfactory and dispersed pattern of development ?

2. Should there be a broad area of search to include land west of Southwater? Can inclusion of this area be justified in a strategic context?

3. Irrespective of its scale, would it be possible to bring development forward at an earlier date than envisaged or would transport infrastructure requirements prevent this? (asked because some suggest it as an alternative or contingency)

4. Will this, as some claim, be a car-reliant development which will exacerbate current traffic problems in a wide area or does improving the Arun rail line, associated with other public transport possibilities offer real potential for a development sustainable in transport terms?

ISSUE 6: THE STRATEGIC LOCATIONS (NORTH EAST OF THE COUNTY & A23 ROAD/RAIL CORRIDOR)

ISSUE 6(iii) WEST OF EAST GRINSTEAD - MATTERS FOR DISCUSSION

The basic question that the Panel is asking is:
Should we endorse the strategic locations as proposed, and if so do we agree with the numbers of dwellings and the timescale put forward? If we have concerns about the proposal how might the plan need to be changed so as to ensure that the required housing numbers are delivered?

Matters for debate

1. Can strategic development on the scale proposed be accommodated in this location whilst effectively maintaining the separate identity and character of nearby settlements or will it result in a sprawl of development from Crawley to East Grinstead contrary to the aims of the Structure Plan?

2. Will it be possible to provide adequate and appropriate public transport and road links to Crawley and Gatwick so as to enable this location to make an effective contribution to economic growth in that area without adding unacceptably to congestion levels?

3. Is it realistic to expect that the transport and indeed other necessary infrastructure required to support this development can be planned and delivered in order that 2500 homes can be provided in the plan period?

ISSUE 6: THE STRATEGIC LOCATIONS (NORTH EAST OF THE COUNTY & A23 ROAD/RAIL CORRIDOR)

ISSUE 6(iv) WEST OF BURGESS HILL - MATTERS FOR DISCUSSION

The basic question that the Panel is asking is:
Should we endorse the strategic locations as proposed, and if so do we agree with the numbers of dwellings and the timescale put forward? If we have concerns about the proposal how might the plan need to be changed so as to ensure that the required housing numbers are delivered?

Matters for debate

1. Given the geography of the town and commitments on the green crescent, would not development in this location be a distortion of the existing settlement, projecting into the countryside and having a considerable impact on it? Would this not result in a new community isolated from and unrelated to the existing one?

2. Is the town of Burgess Hill physically and socially equipped to withstand a further expansion (even 500 homes) or will major infrastructure improvements and reconstruction be necessary to make it so?

3. Is a development which is sustainable in transport terms possible in this location given the geography of the town, rail capacity problems and the proximity of the A23?

4. If this is seen as a key strategic location for the longer term, given the constraints would it not be preferable to carry out an assessment of the wider area to test all development options rather than allocate 500 homes now?

ISSUE 7 THE STRATEGIC LOCATIONS (COASTAL AREA)

Do the new Strategic Locations identified in Policy LOC1 (b.2 & b.3) offer the best opportunities for sustainable strategic development?

ISSUE 7(i) SOUTH-WEST OF CHICHESTER - MATTERS FOR DISCUSSION

(a) What would be the impact on features of acknowledged importance and what are the environmental constraints (including the risk of flooding, and the impact on Strategic Gaps)?

1. Why is there a need to specify the location so precisely? Would there be advantage in this particular instance in leaving the various potential sites to be examined and compared in greater detail in the review of the Local Plan? Would the timetable for that LP allow for delivery of development on this scale within the plan period?
2. How detailed an assessment has been carried out of the environmental effects of the proposal? Would it be appropriate to include it as a Strategic Location unless an assessment had been carried out under the Habitats Regulations? If not, will there be a need at some time to carry one out, and what would happen if its results suggested that development here would be materially harmful?
3. On the basis of the information available now, are English Nature saying that whatever the mitigation which were to be provided for a development of about 750 dwellings, it would inevitably be so harmful that it should be deleted?
4. What would be the impact of this development on the character of Chichester?
5. Why is the location stated to be about 750 dwellings - what threshold does this figure represent and what material additional harm would be done by increasing it to, say, 1500?

6. The Environment Agency suggest that it would be feasible to locate the amount of development now expected on areas outside either the fluvial or tidal floodplains. Does anyone disagree with this?

7. We will be considering Strategic Gaps in general under Issue 11, but are they a constraint of a different kind to, say, flooding or the SSSI in being essentially a matter of planning policy?

(b) What are the transport implications and needs?

8. Are the listed improvements all necessary before the development and are they necessitated by it? If they are, who will pay for them, and if they would not otherwise be carried out, how many dwellings would be needed to bear their costs?

9. Is the Stockbridge Relief Road a benefit resulting from development or a means of ensuring that it would not make conditions worse? Could it in itself cause harm?

10. The County Council explain that this site would be within walking distance of facilities in Chichester. Others point out that such journeys would be difficult on foot. How well located is the site in terms of minimising the use of the private car?

(c) What would be an appropriate timescale for development having regard to the necessary infrastructure provision and how much development could realistically be provided?

11. The roadworks which are involved would on their own be likely to take several years to plan and implement. Is a start before 2011 realistic?

12. Would a development restricted to 750 dwellings but bearing substantial infrastructure costs be capable of providing a substantial proportion of affordable dwellings?

(d) Are there alternative and better locations for strategic development close by?

13. Are there alternative locations in the immediate vicinity of Chichester which would avoid some of the more potentially harmful effects of this location?

14. Would this be a site with positive locational merits in terms of sustainability and regeneration (especially accessibility to public transport) - and if so, what are they - or would it be merely the least harmful?

ISSUE 7 THE STRATEGIC LOCATIONS (COASTAL AREA)

Do the new Strategic Locations identified in Policy LOC1 (b.2 & b.3) offer the best opportunities for sustainable strategic development?

ISSUE 7(ii) EAST OF CHICHESTER DISTRICT/WEST OF ARUN DISTRICT

MATTERS FOR DISCUSSION

(a) What would be the impact on features of acknowledged importance and what are the environmental constraints (including the risk of flooding, and the impact on Strategic Gaps)?

1. One of the main constraints is said to be on land around Barnham in the Barnham Rife Catchment Area. Is this so great as to limit the `west of Arun District' part of the proposals to land west of Westergate or at Ford?

2. Should this be regarded as a single Strategic Location or as two separate locations with similar characteristics? If the latter, should the same prerequisites apply to both?

3. Is the addition of a new Strategic Gap between Chichester and Tangmere intended to imply that development on the western side of Tangmere should not form part of this Strategic Location?

4. If so, and given the many constraints, where might this development be located?

(b) What are the transport implications and needs?

5. There is little argument about the need for an Arundel Bypass, but it is not clear to what extent any existing need would be exacerbated by this development. What is the likelihood of its

construction, and when would that be? Is this is any way dependent upon the present proposal, and if so why?

6. Improvement of the A29 to Bognor, including providing a bridge at Woodgate, would seem to be of considerable benefit. Does this imply a preference for development west of Westergate?

7. Would the site(s) have positive merits in terms of encouraging the use of non-car means of travel, and in particular how could incentives be provided to increase the use of buses?

8. How practicable would it be to add or move railway stations?

(c) What would be an appropriate timescale for development having regard to the necessary infrastructure provision and how much development could realistically be provided?

9. In view of what has been said earlier about the Arundel bypass, what is the most realistic estimate of when development could start here?

(d) Are there alternative and better locations for strategic development close by?

10. Did this proposal originate in a search process according to the advice in PPG3? If so, is it certain that it is not possible to provide development in Arun on sites closer to existing larger settlements?
11. What are the positive merits of these locations?

12. Ford airfield seems to be a resource with considerable potential. Is there merit in investigating it further, possibly for the longer term as a kind of new settlement, or does it even have such clear merits that it should be identified as a Strategic Location now?

ISSUE 8 THE RELEASE OF HOUSING LAND

Will the Plan's stance on the release of land for housing provide for the total requirement and maintain an adequate supply?

MATTERS FOR DISCUSSION

(a) What are the implications of the provisions of Policies NE1(b.2) and NE3(a) for the effective planning of greenfield development?

1. Does the SP set out clear mechanisms for both monitoring and managing?

2. If not, should its policies be modified to include them, or should this be left to LPs?

3. If so, could they do this in time to ensure that the necessary managing does take place; how would sites across boundaries be dealt with; and would there be a continuing need for a SP Policy to explain how monitoring should be carried out and what should be done if it were to show that a shortfall in one District might need to be made up in another?

4. Does Policy NE3 fail to recognise the importance of the Strategic Locations as `building blocks'? Might it dissuade developers from investing in infrastructure if they could not be sure of obtaining permission to start development in the relevant phases?

(b) Is Policy NE3 in accordance with Government guidance in PPG3? Is it needed in the Structure Plan?

5. Does NE3 go beyond PPG3 or merely restate it?

6. What does NE3b(1) add to NE1?

7. What is the intended significance of the changed wording in PC/37 of NE3a of `undeveloped' to `unimplemented' and `developed' to `used'?

8. Is there a need for a more pro-active approach to the development of PDL, including exhortation to the use of compulsory purchase by LPAs for site assembly?

9. How would NE3a work, bearing in mind that unexpected constraints may be found to apply to some identified sites, and that a substantial proportion of PDL in some Districts is likely to be on sites that will not have been identified in Local Plans? ,

(c) Is the phasing of development as envisaged in Table 2 of Policy NE1 likely to be manageable and achievable by Districts? Should Table 2 be part of Policy NE1 or at least referred to in it?

10. Is Table 2 intended to be a constituent part of the SP which must be followed by Districts? If so, why is there no mention of it in the Policy and what mechanism could there be to ensure adherence to it (bearing in mind that monitoring is likely to be mainly in arrears) and at the same time to provide flexibility if necessary? If not, is it merely indicative or what is its purpose?

ISSUE 9(i): STRATEGIC EMPLOYMENT REQUIREMENT

The basic question that the Panel is asking is:

Does the plan adequately provide for economic growth in the north east of the county?

Matters for debate

1. Will sufficient good quality sites be available for new business under the plan's strategy, especially in the Crawley/Gatwick area?

2. Does the CC's approach to the quantity of employment land required in each district need to be modified to take on board other considerations and should its basis be more transparent in the plan?

3. Should the plan's stance on the release of employment land be stated more specifically so as to give greater guidance to the districts?

4. Should the plan's provisions to serve the needs of Gatwick Airport be adjusted in the light of new circumstances?

ISSUE 9(ii): STRATEGIC EMPLOYMENT REQUIREMENT

The basic question that the Panel is asking is:
Does the plan adequately provide for coastal regeneration in terms of what is desirable and feasible locally rather than in terms of any relationship with the north east of the county?

Matters for debate

1. Should the SP be doing more to achieve its aims and objectives for economic development and regeneration given problems of image and accessibility and the heavy reliance on previously developed land in two districts?

2. Are there specific local issues relating to employment land allocations or to the release of employment land that are not being otherwise covered?

3. Are constraints such that neither Shoreham Airport nor Shoreham Harbour will be able to make an appropriate contribution to coastal regeneration? Should the plan be more explicit about a strategy for both?

ISSUE 10(i): TRANSPORT

The basic question that the Panel is asking is:
Are the transport provisions of the plan adequate, realistic and achievable? In particular are they so in relation to the plan's development strategy and in relation to the various external studies and strategies?

Matters for debate

1. Is sufficient emphasis given to the need to provide a real choice of mode, especially in the strategic locations where there is an opportunity to influence attitudes to travel from the outset?

2. Will the changes outlined by the CC in their statement be enough to clarify the relationship between the Structure Plan and the Local Transport Plan and to strengthen the links between them? Are some of the plan's transport proposals too prescriptive?

3. Will the transport infrastructure, particularly that in the Gatwick / Brighton corridor, cope with the increased pressures likely to be placed on it by a concentration of development in the north east of the county?

4. Are there changes in terms of both principle and detail that need to be made to the plan to reflect the draft Regional Transport Strategy and the South Coast Multi Modal Study?

ISSUE 10(ii): INFRASTUCTURE

The basic question that the Panel is asking is:
Does the plan deal with the question of non- transport infrastructure provision at all levels in a clear and unambiguous manner and if not what changes might be necessary?

Matters for debate

1. Given issues raised by some of the service providers and the lack of direct control by the local authorities, what guarantees are there that the wider needs will be met and at the right time?

2. How might policy DEV3 and/or related policies be changed to give greater steer on this matter?

3. How might policy DEV3 be amended to clarify the situation regarding the accommodation of existing needs?

ISSUE 11: RURAL AREAS

Does the Plan achieve the right balance between protecting environmental and visual assets and providing for the economic and social needs of rural areas?

MATTERS FOR DISCUSSION

(a) Are the Plan's policies on character and the environment too permissive or overly restrictive (including Policy CH6 [Strategic Gaps])?

1. Is there a general need to make Policies relating to rural areas more flexible, and, if so, in what way?
2. What is the relationship between the ENV and CH policies and the Strategic Locations?
3. Are there sufficient safeguards in respect of development in the AsONB?

4. Is Policy CH6 (Strategic Gaps) too restrictive?

- Does it tend to act as a form of Green Belt?
- Are all of those listed strategic in nature?
- Do they need to be listed or should the Policy be replaced with a more generalised one indicating the importance of avoiding the coalescence of settlements?
- Do the various Gaps listed all have the same character or needs? Should there be separate policies, for instance, for major gaps between towns and for smaller gaps within largely built-up areas?
- Does the Policy make it sufficiently clear that Districts will need to look critically at their definitions of the boundaries of Gaps to keep them to the minimum necessary to perform their strategic functions?

5. Do some existing SP Policies on Character go beyond what is appropriate for a SP? Is there a case for including a policy relating to the use of local materials, or would this be too detailed for a Structure Plan?

(b) Should development other than for local needs be permitted in rural areas?

6. Should `local needs' be defined within the Policy?
7. Should new development in rural settlements be encouraged to occur in the more sustainable locations, or should it be spread around more generally?
8. Is provision for `local needs' sufficient to ensure sustainable and viable rural communities, and encourage economic diversity within them?

(c) Is sufficient attention paid in the Plan to agriculture and farm diversification?

9. Should farm diversification be supported in principle? If so, is Policy LOC2a (end) intended to refer to it? Should there be a more explicit reference, and, if so, should it distinguish between different types of diversification?
10. Should `whole farm plans' be referred to?

(d) Is the Plan's stance on the development of brownfield sites in the countryside sufficiently clear?

11. Should the various possible kinds of re-used land in rural areas be defined and dealt with separately in policy terms? Is there a specific problem in relation to glasshouses, and how should it be tackled?
12. Do PCs 30 and 31 clarify Policy LOC2 sufficiently?

(e) Should there be a more explicit strategy in the Plan for rural areas and their regeneration?

13. What form would such a strategy take, and would this go beyond land-use matters?
14. Should the Plan place greater emphasis on the importance of the rural economy to balance the many Policies relating to the protection of the environment?

ISSUE 12: AFFORDABLE HOUSING

Does the Plan place sufficient emphasis on the provision of affordable housing?

MATTERS FOR DISCUSSION

(a) Does the Plan provide sufficient guidance to the districts on the proportion of affordable housing they should be negotiating? Should targets be added to Policy NE1?

1. What would be the purpose of PC/35 which would include a figure of 30-40% in para 119? Do any particular circumstances apply in West Sussex which would outweigh the advice in Circular 6/98? What is the figure derived from and what would be its intended status? If it is intended as a target should it be included within a Policy, and if not, is there a risk that inclusion in the text might mislead users of the Plan as to its status?

2. If a target were to be included, would 30-40% be so large as to be likely to make some PDL schemes not viable?

3. Does the term `low cost market housing' in the Circular imply that these dwellings are subsidised by developers or merely that the developers are keeping their costs down to be able to sell them at a comparatively low price?

4. Do greenfield and/or larger sites offer better potential for providing affordable housing?

(b) Is there a need to give more emphasis to provision for key workers and those with special housing needs?

5. Is provision for key workers part of that for affordable housing or an addition to it?

6. Should the term `key workers' have a single definition throughout the county or should it be varied for each District?

7. Should special needs housing be referred to in one of these Policies or elsewhere in the SP?

(c) Should the Plan be more explicit about how affordable housing needs should be met in rural areas?

8. Is the suggestion of `1 for 1' dwellings in para 119 intended to form part of the Policy? If not, what is its intention or status?

9. Would NE2(PC)b2ii be sufficiently effective way to assist in rural areas?

(d) Should there be a separate and stronger policy on affordable housing?

10. Should NE2(PC) be added to the Plan?

11. Are Policies NE2 and NE2(PC) both intended to refer to both forms of affordable housing (social housing and low cost market housing)?

APPENDIX G

POLICY LOC1

Recommendation 3.1
Policy LOC1 should be rewritten as follows:

(a) Unchanged from DDSP

(b) 'Development requirements which cannot be met within towns and villages or at sites with existing planning permission (subject to review at renewal) should be provided for mainly in the form of large scale, mixed use development at the following strategic locations:

  (1) these committed locations (*) where development should start before 2006:
    (i) Crawley (North East Sector) (+)
    (ii) south east and south west of Haywards Heath;
    (iii) east of Angmering;
    (iv) Worthing (Durrington);
    (v) north of Bognor Regis (Bersted/Felpham);
  (2) these locations in the north east of West Sussex associated primarily with growth in the Crawley/Gatwick/M23 sub regional area identified in RPG9:
    (i) west of Crawley;
    (ii) west and south west of East Grinstead;
    (iii) west and/or south west of Horsham;
  (3) these locations in the coastal area of West Sussex associated primarily with regeneration of that area:
    (i) at Chichester City;
    (ii) in Arun District west of Barnham.

(c) In addition to the locations identified under (b) limited provision should be made in local plans or their successors for the small scale gradual growth of villages and small towns spread over the plan period which will assist the evolution of rural communities by meeting identified needs for housing and economic activity and supporting local facilities and services, and for small-scale extensions to the main towns in the passenger transport corridors to meet identified local needs not otherwise met by strategic scale development.'

(d) Unchanged from DDSP.

(*) These locations are already identified in adopted or deposit draft local plans. Their development potential should be optimised to an extent compatible with the local character, environment, resources and assets of each location.

(+) Development at this location may be delayed as a result of consultations on the possible future expansion of Gatwick Airport.

The EM to Policy LOC1 should cross reference to Policies NE1 and 3 in relation to monitoring, release and contingency, should list the main towns in the passenger transport corridors to avoid confusion and should more fully explain the role of small-scale extensions to those towns.

Recommendations 6.1. 6.5, 6.8, 6.12, and 7.1 are largely covered by Recommendation 3.1, above, which incorporates all the changes recommended to Policy LOC1.

Recommendation 6.1
West of Crawley should be retained in the structure plan as a strategic location, and reference in the EM to it accommodating 2500 homes in the plan period is endorsed.
Recommendation 6.5
West and/or south west of Horsham should be retained in the structure plan as a strategic location, and reference in the EP to it accommodating 1000 homes in the plan period is endorsed.
Recommendation 6.8
A strategic location at East Grinstead should be retained in the structure plan with the revised designation 'west and south west of East Grinstead'. The EM to policy LOC1 should continue to make reference to a figure of 2,500 dwellings to be accommodated there, should explain that any shortfall in provision due to delays will be accommodated in strategic locations adjacent to Crawley and Horsham and should include reference to the requirement for and scope of ongoing joint working with neighbouring authorities to seek a resolution of issues relating to the construction of a relief road.
Recommendation 6.12
West of Burgess Hill should be deleted from Policy LOC1 as a strategic location.
Recommendation 7.1
Replace in Policy LOC1 the strategic locations south-west of Chichester City and in the east of Chichester District/west of Arun District with locations 'at Chichester City' and 'in Arun District west of Barnham' with capacities of 1250 and 1000 dwellings respectively referred to in the EM.
The terms in which the Stockbridge Relief Road is referred to in NE15 will need to be reviewed as a consequence.

POLICY LOC 2

Recommendation 11.1
Policy LOC2 should be replaced in a shorter form dealing only with locational matters. It should be worded as follows:

'Development in the countryside, including undeveloped coastal locations, will not be permitted unless it can be demonstrated to require a countryside location or to meet identified local economic or social needs. Such development should be compatible with its location in the countryside and should either assist in sustaining the countryside as a place of varied and productive social and economic activity or should result in substantial environmental enhancement. The re-use of existing buildings for these purposes will be acceptable, as will be the redevelopment of previously developed rural land in sustainable locations where it would meet these criteria and could not be re-used for agricultural or forestry use at economic cost. Previously developed rural land is that outside built-up areas which contains permanent buildings or structures or associated fixed surface infrastructure which is no longer in use but which has not so far blended into the landscape in the process of time to such an extent that it can reasonably be regarded as part of the natural surroundings.'

POLICY NE1

Recommendation 1.2
Policy NE1 should include a note explaining that much of the allocation of dwellings to Horsham and Mid Sussex districts that is attributable to strategic locations relates to the needs of the Crawley/Gatwick area. This should be cross referenced to Policy NE7.

Recommendation 4.1
Make no modification to the targets for PDL contained in Policy NE1.

Recommendation 5.1
In Policy NE1(a) include the overall county net annual figure for new dwellings as a separate line in the main table rather than as a footnote. Extend the EM to explain the reasons for the conversion rate adopted and to emphasise the need to monitor both gross and net figures for new dwellings.

Recommendation 8.1
Make no modification to Policy NE1

Recommendation 9.1
Policy NE1 should include a note to explain that an element of the employment allocations to Horsham and Mid Sussex Districts relates to development supporting growth at Crawley/Gatwick and that subject to discussions between these two district councils and Crawley Borough Council on the apportionment some of it is to be provided within Crawley Borough. The EM to the policy should make a cross reference to Policy NE7 which provides the basis for this approach.

Recommendation 5.2
Add to the Explanatory Memorandum to Policy NE1 a warning that the figures in Table 1 are intended to be indicative rather than prescriptive, and that they do not form a part of Policy NE1. The Table should be varied as follows:

Arun Add 250 to the figure for Commitments and reduce that for large-scale greenfield by the same amount.

Chichester Reduce unidentified previously developed land by 200.

Mid Sussex Add 400 to the figure for Commitments and 100 to that for small-scale greenfield, and reduce that for large-scale greenfield by 500.

Worthing Increase Commitments by 200.

Recommendation 8.4
Delete Table 2.

Recommendation 9.2
The EM to Policy NE1 should briefly explain how the employment allocations are derived, including a reference to their component parts, and give greater emphasis to the fact that they are not prescriptive requirements, spelling out what this means in practice.

POLICY NE2

Recommendation 12.1

Modify Policy NE2 and add Policy NE2(PC) as set out in PC/34.

Recommendation 12.2
Include a precise explanation of what is meant by the phrase 'affordable housing' in Policy NE2(PC), the EM and the glossary, and add a cross-reference in the EM to the ways in which low-cost market housing will be provided.

Recommendation 12.3
Indicate in paragraph 118 the derivation of the figures "30-40%" added by PC/35 and explain that, like those included in RPG9, they would be essentially provisional indicators of the order of size required.

Recommendation 12.4
Replace the final part of the penultimate sentence of paragraph 119 ("should be … permitted") with "may be secured on even the smallest sites".

POLICY NE3

Recommendation 8.2
Replace Policy NE3 with the following:-

(a) The release of housing land should be managed in order to deliver the levels of housing development in Policy NE1(a) and to give priority to the reuse of previously developed land within built-up areas. The adequacy of housing land supply will be assessed through annual monitoring against the levels of housing development in Policy NE1(a). Once started, land at each strategic location should continue to be released in accordance with the phasing programme agreed for that particular Location and should not be affected by any subsequent review of the phasing of sites.

(b) The level of housing development in Policy NE1(a) should be achieved within each district to enable the delivery of an annual average rate of 3,100 homes (gross) within West Sussex. Any shortfall or surplus should be addressed within each district. In exceptional circumstances, any shortfall arising in one district should be addressed within the relevant sub-area of the County through joint assessment by the district planning authorities. This may result in the need to bring forward an allocation identified for development in a later phase of a local plan. However, such assessments will need to take account of any surplus of provision within the other districts within the sub-area which would offset the shortfall.

(c) District planning authorities will:

1. determine the phasing of the strategic locations and other housing allocations (in whole or in part) taking into account Policy NE1(b)(2). This will include working together in relation to large sites which cross district boundaries; and

2. include policies in local plans to specify the phase in which housing allocations on previously developed land and greenfield sites (in whole or in part) should be developed and, taking into account the levels of development in Policy NE1(a);

    i. ensure that the strategic locations, once started, continue to be released in accordance with phasing and are not affected by any subsequent review of the phasing of sites;

ii. bring forward an allocation identified for development in a later phase where there is an inadequate supply of housing land; and

iii. delay the development of greenfield sites where there is an adequate supply of housing land.

Recommendation 8.3
Modify the explanatory memorandum to reflect Recommendation 8.2, including an explanation that the sub-areas referred to would normally be taken as being the north-east of West Sussex and the Coastal Districts, although districts might be added to or subtracted from these areas in particular circumstances.

POLICY NE4

Recommendation 9.3
The following changes should be made to Policy NE4:
- Add to the end of the first sentence 'and appropriate new activities seeking to locate in West Sussex'.
- There should be a new part (b) which brings together the plan's stance on the release of employment land and the various considerations that need to be addressed. Policies NE1(b)(2) and (3) should be cross referenced to this new part of NE4 in respect of specific requirements relating to employment.
- Policy NE4(b) should become (c) with appropriate amendments to reflect the contents of new (b), including a requirement for the comprehensive monitoring of all relevant factors.
- The EM to the policy should
  (a) give more guidance on what quality employment might comprise,
  (b) acknowledge that phasing is not a straightforward exercise and offer guidance on the monitoring process and how various factors should be balanced and
  (c) make reference to the fact that the phasing of land release at Crawley/Gatwick will be required on a joint basis between the three districts involved.

POLICY NE5

Recommendation 9.5
The following changes should be made to Policy NE5:
- Part (a) should be redrafted to accord with the provisions of new part (b) set out below in respect of Shoreham Harbour.
- There should be a new part (b) worded as follows:

"In particular the Shoreham Maritime Vision with its two key components of land reclamation and a new link road between the A259 and A270 will be taken forward by the County Council and its partner organisations as a matter of priority. Development proposals put forward at the Harbour in the short and medium terms for both port related and other uses will be permitted provided that they are consistent with the concept of the Vision and the continued operation of the port in accordance with statute, and that they do not exacerbate traffic problems and environmental conditions in the adjoining urban areas."

- There should be a new part (c) relating to Shoreham Airport which should make the connection between the airport and economic regeneration, allow for some development within the airport boundary relating to its operation and the limited expansion of business aviation activity, stress the transport interchange role and ensure appropriate environmental safeguards in respect of residential areas and the Downs. There should be cross reference to Policy NE18.
- Existing part (b) should become new part (d). Its preamble should be redrafted as follows: 'Local plans will distinguish between the variety of needs for regeneration and renewal in different areas along the coast and adopt appropriate policy responses, including policies to:' (then (1) to (5)).
- New (d)(2) should be redrafted to relate only to Littlehampton.
- Add to new (d)(4) after north east of the county: 'and both short and long term improvements to the access to Shoreham Harbour'.
- Add to new (d)(5): 'including positive and direct action to tackle particular physical problems'.

Recommendation 9.8
The EM to Policy NE5 should:
- provide a better explanation of the nature of deprivation in the coastal area;
- say more about the action being taken in town centres and other specific locations to achieve physical and social regeneration,
- say more about the role of partnerships and the multi-faceted approach to tackling problems,
- stress the important role of the strategic locations in providing a greater range of employment opportunities, and
- specify what progress is being made on joint, cross-boundary working relating to the PAER.

Reference in the EM to Shoreham Harbour having possibly the largest areas of unused or underused land in the county should be deleted or replaced with a statement reflecting the reality of the situation in relation to port operations; and references to road access being poor should be explained in terms of the environmental problems which arise from current arrangements.

POLICY NE6

Recommendation 9.6
Policy NE6 should be deleted.

POLICY NE7

Recommendation 1.1
Policy NE7 should be redrafted so as to give specific emphasis to the Crawley/ Gatwick area as a focus for growth in the context of RPG9, making reference to a strategic employment

allocation and providing a context for an area based approach to housing allocations. The policy, to properly reflect RPG9, should also make reference to development in the north east of the county where possible maximising economic benefits specifically to the coastal region in order to assist regeneration there. In the absence of any clear guidance on how the plan can assist this process, the EM to the policy should say more about the timing and aims of the joint study required by RPG9 paragraph 12.22(b).

POLICY NE12

Recommendation 10.3
Policy NE12 should to be made more positive and encouraging in respect of infrastructure provision which favours walking and cycling.

POLICY NE13

Recommendation 6.10
Add to the list in Policy NE13(b):
'As part of a comprehensive package of transport improvements at East Grinstead, a high quality link between East Grinstead and Crawley/Gatwick'.

Recommendation 10.4
Policy NE13 should incorporate a stronger statement of intent in the preamble to (b) in line with the last sentence of paragraph 7 of our report, together with additions to the list of schemes under (b) to include:-
(5) high quality public transport proposals linking strategic locations with their adjoining urban areas;
(6) public transport improvements in the Gatwick to Brighton corridor;
Other schemes to be added by WSCC if appropriate. (See also recommendations under Issues 6 and 7.)

POLICY NE 15

Recommendation 6.11
Add to the list in Policy NE15(c):
(4) 'As part of a comprehensive package of transport improvements at East Grinstead, highways elements, including a possible relief road, which will accommodate demands generated by development at the strategic location and provide relief to congestion in the town centre whilst taking full account of the traffic and environmental impacts in both the immediate and wider surrounding areas*'.
Delete NE15(c)(2)(v)
Recommendation 6.13
Reference to the A2300 Burgess Hill link road improvements should be deleted from Policy NE15.

Recommendation 7.1
Replace in Policy LOC1 the strategic locations south-west of Chichester City and in the east of Chichester District/west of Arun District with locations 'at Chichester City' and 'in Arun

District west of Barnham' with capacities of 1250 and 1000 dwellings respectively referred to in the EM.
The terms in which the Stockbridge Relief Road is referred to in NE15 will need to be reviewed as a consequence.

Recommendation 10.5
The supporting text to Policy NE15 should make reference to the impact of level crossings on movement across the south coast rail line, giving a commitment to take steps to improve the situation where appropriate and where opportunities arise.
(See also recommendations under Issues 6 and 7.)

POLICY NE17

Recommendation 9.4
Policy NE17 should be amended so that in exceptional circumstances, commercial development should be permitted at Gatwick Airport if it secures significant improvements to sustainable transport at the airport.

POLICY NE18

Recommendation 9.7
Policy NE18 should be rewritten as a general aviation policy without specific reference to Shoreham Airport though with general requirements that would apply to Shoreham Airport as well as Goodwood and other possible airstrips.

POLICY NE 19

Recommendation 6.3
Reference in Policy NE19(b)(5) should be to an Interchange Station west of Crawley rather than a Parkway Station.

Recommendation 6.7
Policy NE19(b)(4) should be changed to 'A new or improved interchange station south west of Horsham'.

Recommendation 6.14
Reference to Burgess Hill and Wivelsfield stations should be deleted from Policy NE19 unless there is a prospect of improvements to the integration of transport at those stations being accomplished other than through strategic-scale development.

POLICIES CH3,4,5,7

Recommendation 11.3
Policies CH3, CH4, CH5 and CH7 should be deleted. Any part of their content which is of strategic importance and does not repeat what is said in national guidance should be

incorporated into Policy CH1. Detailed advice to district councils as to the production of local plans which would be otherwise be omitted as a result of these recommendations should be included in the bullet points following paragraph 263.

POLICY CH6

Recommendation 11.4
Policy CH6 should be modified to omit the list of strategic gaps in (a) and the whole of (b). The remaining text should be worded as follows: "Development should not be permitted unless the strategic settlement pattern of the County will be retained. The separate identity and character of settlements will be maintained and, where possible, enhanced, and their coalescence will be prevented."

POLICY ERA3

Recommendation 10.10
Policy ERA3(b)(2) should be amended to reflect the fact that SUDS are not appropriate in all situations.

POLICY DEV3

Recommendation 10.8
WSCC should establish more formalised procedures for co-ordinating major development and infrastructure provision and these should be referred to in the EM to Policy DEV3.

Recommendation 10.9
Policy DEV 3 should be rearranged to distinguish between on site or local provision of infrastructure, (including planning obligations), and wider provision, together with how both are to be secured. Reference to development accommodating existing needs should be deleted. The words 'where possible' should be removed from (b)(1). The EM should explain how respective levels of infrastructure are to be funded and provide more clarity on the WSCC's intentions regarding accommodating existing needs.

POLICY DEV4

Recommendation 10.6

Policy DEV4 should be made more positive by requiring development where appropriate to contribute towards a shift to more sustainable modes. The supporting text to the policy should be expanded to include specific guidance on the relationship between development and sustainable transport provision in line with paragraph 24 of our report.

POLICY DEV6

Recommendation 10.7
Policy DEV6(b)(2)(vii) should be re-drafted as follows:
"include high quality transport networks for walking, cycling, and passenger transport which fully integrate with each other and with existing and potential provision, provide for easy access between new residential areas and the town centres and employment areas, and between built-up areas and the countryside, and offer an attractive alternative to the private car."

STRATEGIC DEVELOPMENT PRINCIPLES

Recommendation 3.3
The Strategic Development Principles for each strategic location should include a list of requirements based only on needs which stem from development in the broad location identified, cross referenced to those policies which provide a context and explain the justification for the requirements, together with principles which will guide development to the best sites. In the 'General Principles' section the word 'acceptable' should be replaced by 'minimised' in bullet points 2 and 4.

Recommendation 6.2
The following changes should be made to the Strategic Development Principles added by PC/60 relating to the Crawley location:

(a) Reference should be made in an additional bullet point to the need for increased capacity at the Crawley sewage treatment works.

(b) For consistency with Recommendation 11.4 the last bullet point should be altered to read 'Development should avoid the coalescence of Crawley with any other settlement including Rusper and Faygate'.

Recommendation 6.6 (Horsham)
The following changes should be made to the Strategic Development Principles added by PC/60 relating to the Horsham location:
(i) Add to the words in brackets under the first bullet point 'to be specified by the county council and be in place prior to the commencement of development, and improved rail interchange'.
(ii) At the beginning of the second bullet point add the words 'High quality' and at the end add 'and should include significant bus priority measures'.
(iii) Delete the last bullet point and replace with 'Development should protect the character and separate identity of Southwater and Warnham and should not detract from the character and identity of Broadbridge

Recommendation 6.9

The following changes should be made to the Strategic Development Principles added by PC/60 relating to the East Grinstead location:

(a) The first bullet point should be altered to read:

'The development should be contingent on:

(i) the provision of a comprehensive package of transport improvements which as essential requirements will

(a) alleviate traffic congestion in East Grinstead,

(b) provide a high quality passenger transport link to Crawley/Gatwick which offers a realistic and convenient alternative to travel by private car, and

(*c*) take full account of the traffic and environmental impacts in both the immediate and wider surrounding areas (Policies NE13 and 15);

(ii) from the outset provision of high quality passenger transport links to the town featuring appropriate priority measures (Policy NE13);

(iii) an improved transport interchange at East Grinstead station (Policy NE19).'

(b) The last bullet point should be deleted to be consistent with Recommendation 11.4

Recommendation 7.2

In the Strategic Development Principles added by PC/60 with respect to east of Chichester District/west of Arun District the likely requirements for the first replacement Location should be as in the existing Location subject to

(1) the replacement of the second bullet point with a more generalised reference to road and public transport improvements affecting links between the proposed site, the city centre and other important facilities in Chichester and to the public transport improvement being of sufficient quality to offer a credible alternative to travel by private car, and

(2) to the need for due account to be taken at the design stage of the character of existing settlements.

Recommendation 7.3

In the Strategic Development Principles added by PC/60 with respect to with respect to east of Chichester District/west of Arun District the likely requirements for the second replacement Location should include improvements to the A29 (including a grade separated railway crossing), the provision of public transport to the location of sufficient quality to offer a credible alternative to travel by private car, the investigation of the feasibility of a new railway station, and the construction of the A27 Arundel Bypass.

ADDITIONAL MATTERS

Recommendation 6.4

Joint studies should be continued with a view to identifying an additional strategic location on the perimeter of Crawley for longer term needs and as a possible contingency should there be a shortfall in provision in the wider Crawley area that cannot otherwise be met locally.

Recommendation 10.1
A new overarching policy on transport should be incorporated before Policy NE12 to set out the overall philosophy, including clarification of the balance sought between road building and public transport improvements and the strong emphasis to be given to the development of sustainable transport.

Recommendation 10.2
The EM to the new policy referred to in Recommendation 10.1 should explain and clarify the relationship between the Structure Plan and the Local Transport Plan, and the co-ordinated and integrated package approach to transport improvements, including the future consideration of demand management measures.

Recommendation 11.2
An additional policy should be included in the Needs Chapter to deal with rural needs. It should contain the main sections omitted from Policy LOC2 and should support farm diversification where that would result in the survival of the farm and a generally agricultural form of land management.

The Explanatory Memorandum supporting this new NE Policy should advocate the use of parish plans and whole farm plans as valuable tools in the production of appropriate local plan policies.

Recommendation 3.2
An appendix in tabular form should be included in the plan clearly setting out how the new strategic locations relate to key criteria for selection and performance, including sustainability criteria and particularly those relating to transport.