

8Gii Housing and Environment

8Gii.1 Is the proposed housing provision for the sub-region at the most appropriate level, having regard to social, economic and environmental considerations?

1. The housing numbers proposed of 33,000 are extremely high in view of the considerable environmental constraints on development within the sub-region (ref 8G1.i). 13,800 of these new homes are to be located in Mid Sussex District which is very rural district and has limited employment opportunities. The pressure on infrastructure of these additional homes will be considerable. The restrictions associated with the uncertainty over a second runway at Gatwick further complicate matters. West Sussex has the lowest amount of urban potential land for development, forcing uptake of greenfield land if these housing numbers were accepted. We commend West Sussex County Council's success in recent years to maximise the use of brownfield sites, far exceeding government targets and are encouraged by their plans to redesign and redevelop Crawley to make better use of underutilised brownfield sites within the urban area.

2. We are concerned that historical towns such as East Grinstead and Horsham that are already committed to taking large number of new homes through the existing Structure Plan will have significant additional development within the plan period. The dramatic increase in their populations will overload the existing infrastructure. Social networks will be put under considerable pressure to enable the incomers to assimilate into existing communities. This will place additional demands for community infrastructure on top of the physical infrastructure deficit. We believe that development opportunities in Crawley would be a better focus for the sub-regional strategy. With its strong transport network, proximity to Gatwick and internal employment opportunities is well served to absorb additional housing.

8Gii.2 Is the target that 40% of new housing should be affordable justified and appropriate (Policy GAT3)? Is it capable of being achieved?

3. The target of 40% affordable housing is justified; however it is unlikely that even this level will meet the local need for affordable housing, particularly in the villages. It is difficult to see how this target can be delivered unless there is direct government funding. We strongly support additional small scale affordable housing in rural areas where rural affordable housing surveys have demonstrated local needs. We support using the "exceptions policy" where appropriate. GAT 3 may need to give more specific guidance on how affordable housing rates are to be achieved and how these may be funded.

8Gii.3 Is the proposed apportionment of the overall housing provision to the Districts at the most appropriate level, taking account of socio-economic and environmental factors?

4. No - Mid Sussex District had the highest quantity of housing provision in the Plan. However this area is furthest from the areas of employment, and the new housing will result in the majority of workers commuting by car to their work place.

5. The apportionment of the overall housing provision to the Districts seems excessive. It assumes that population growth will be sustained by continued economic growth. Economic growth in the region is predicated on Gatwick and air travel for which it is assumed demand will continue to increase to 2030. This is a high risk assumption. The continued supply of petroleum based aviation fuel cannot be assured indefinitely; low cost air fares which have stimulated demand are unsustainable; increasing concern for the environment may compel governments to impose severe restrictions on air travel; an influenza pandemic would impact on the demand for air travel; terrorism is an ever present threat - the destruction of an airliner with enormous loss of life would also impact on demand, albeit for short time only. Economies that dependent on a single driver are extremely vulnerable- e.g. think of UK iron and steel producers, the coal industry, car industry and so on.

8Gii.4 How should the potential of transport corridors, including their relationship with adjacent sub-regions and with London, be taken into account in the spatial strategy (Policies GAT1 and GAT2)?

6. Linear development does not achieve the most economic use of the infrastructure which is an essential prerequisite for any further development in the sub-region. Such development along the M23/A23 is not sustainable due to environmental constraints, as it would infringe upon protected landscapes and place greater pressure on already congested road network. The rapid rail link to London is also stretched at peak times with commuters unable to sit for the duration of their journeys and therefore without considerable investment is unlikely to provide an alternative.

8Gii.5 How should the uncertainty regarding expansion of Gatwick be reflected in the housing distribution?

7. It is difficult to see how housing levels can be set until a decision has been taken regarding the second runway. We totally support SEERA's objection to a second runway at Gatwick. If a second runway does not materialise, then further expansion at Crawley would be possible and desirable, improving and expanding Crawley's existing infrastructure and employment opportunities.

8Gii.6 Has the sustainability of developing Green Belt land for housing and mixed uses been properly considered?

8. CPRE is strongly against the use of the Green Belt for housing and mixed uses. Green Belt is essential to maintain the coherence and character of settlements, and as an essential "lung" alongside the intensive development in adjacent areas.

8Gii.7 Is the approach to Strategic Gaps properly justified (Policy GAT1)

9. We are concerned that GAT1 is unclear and could be misinterpreted to mean that development may take place within Strategic Gaps. The presence of these strategic gaps prevents coalescence of settlements whilst providing valuable green lungs for residents. We strongly opposed any move to reduce the strategic gaps.

CPRE Sussex
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