

Crawley Borough Council
Planning Policy
Town Hall The Boulevard
Crawley
West Sussex
RH10 1UZ

Our ref: KT/2011/113399/CS-07/PO1-L01
Your ref:
Date: 28 February 2020

Dear Sir/Madam

Crawley Submission Local Plan Regulation 19 Consultation

Thank you for consulting us on the draft Local Plan.

Having reviewed your document, we find it “SOUND” subject to some minor changes for clarification purposes.

DRAFT LOCAL PLAN

2. Crawley 2035

Paragraph 2.34 (page 25)

The last 2 sentences of the paragraph – *“Another point that should possibly be included in the section of environmental sustainability is the risk of stress on sewage infrastructure as the population grows. This may lead to negative impacts on water quality.”*

These comments were provided by us after reviewing the draft Local Plan, which have been included in this paragraph, however, this does not explain whether the issue of stress on sewage infrastructure is being included in the Local Plan or not.

Please clarify whether stress on sewage infrastructure will be considered in this section on environmental sustainability.

3. Sustainable Development

Strategic Policy SD1: Presumption in Favour of Sustainable Development

We recommend the following for clarification purposes.

Although this policy is directed at Sustainable Development, there is no reference to water resources / water quality. As water quality is closely related to water use, which in turn is an important part of sustainable development.

We would recommend an additional strategic objective within SD1 to ensure that the water environment is also a consideration. For example, no development should impact negatively on the quality or status of water bodies.

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8. Infrastructure Provision

Strategic Policy IN1: Infrastructure Provision

Last Paragraph *“Where appropriate, developer contributions will be sought in the form of planning obligations to address site specific issues, in accordance with the tests in the CIL Regulations.”*

Considering the threat to water quality from the growing population and large developments, it would be beneficial to include water quality monitoring in section 106 agreements to ensure no deterioration of the status of water bodies, especially with large developments. Monitoring should be during construction and post-construction. Water quality should be more clearly highlighted as a concern, as has been done for example with air quality and green infrastructure. Water quality has been included within infrastructure, but impacts on water quality are wide ranging and not only related to provision of sewage infrastructure.

10. Gatwick Airport

Development of the Airport

Strategic Policy GAT1: Development of the Airport with a Single Runway

We support this policy.

We welcome the reference in Policy GAT1 regarding flood risk in relation to the development of Gatwick Airport with a single runway. Areas of the Airport are at risk to fluvial flooding, additional areas with impermeable surfaces could also lead to an increase in the rate and volume of surface water runoff. Future development at the Airport will need to ensure that flooding can be managed on site and not increase the risk to flooding elsewhere.

13. Meeting Housing Needs

Strategic Policy H2: Key Housing Sites

Housing, Biodiversity and Heritage Site

- Land east of Balcombe Road/Street Hill, Pound Hill

This policy needs to be amended for clarification purposes before we can support it.

This allocation of this site must also ensure that biodiversity net gain is achieved, and that sufficient corridor for wildlife is retained along the stream corridor as highlighted in the previous local plan.

The highlighting of the area for housing is not helpful as it includes areas of floodplain along the stream corridor and does not therefore demonstrate full protection of the site's assets. We therefore recommend the way housing area is highlighted is altered or some of the principles of the development change. E.g. reducing the amount of land take by the proposed housing allocation.

Forge Farm (page 150)

It is not clear from the mapping where the additional housing supply land is proposed. Given the amount of semi natural habitat covering remaining areas of this site and the requirement to provide biodiversity net gain the authority may need to think strategically whether on site net gain is realistic and may have to work with neighbouring authorities in order to help provide strategic corridors for wildlife elsewhere.

No significant new sites are proposed within the borough boundaries.

It would be helpful if supplementary guidance looks realistically at how Biodiversity Net Gain can be achieved in collaboration with neighbouring authorities.

14. Green Infrastructure & Biodiversity

Strategic Policy GI1: Green Infrastructure; Strategic Policy GI2: Biodiversity and Net gain; Strategic Policy GI3: Biodiversity Sites

We support these policies

15. Sustainable Design and Construction

Strategic Policy SDC1: Sustainable Design and Construction; Policy SDC3 Tackling Water Stress

We support these policies.

There is one instance of the phrase "extreme water stress" in Paragraph 15.5. Elsewhere (and in the Sustainability Appraisal) your terminology is consistent with our own, as we pointed out in the Regulation 18 consultation. We use "serious water stress". We support the need to tackle the serious water stress in the borough, and welcome the amount of attention this is given in the Plan.

In particular, we are pleased to see Strategic Policy SDC3 specifically devoted to tackling water stress. We support the requirement for domestic developments to meet the 110 litres per person per day standard. The more stringent 100 litres target is supported by the ambition of Southern Water in its Water Resources Management Plan for average consumption across all homes by 2040. The target of 80 litres proposed for significant, strategic scale developments will be challenging, but will help in reducing the overall average to nearer 100. The mention of greywater reuse and rainwater harvesting in para 15.39 is appropriate in the context of achieving 80 litres.

We welcome the requirement in both Strategic Policies SDC1 and SDC3 for new non-domestic buildings to achieve the BREEAM Excellent standard except where not technically feasible.

We note that the Water Cycle Study has yet to be updated, and the justification for these high standards rests partly on the conclusions of the previous one. We hope the new document will also support the policies presented.

In section 15.42, the requirement for non-domestic (and domestic) developments to install meters is not confined to water stressed areas. This is the norm, unless it concerns extensions, and nearly all non-domestic properties are already metered anyway.

16. Environment Protection

Flood Risk (page 196) -Paragraphs 16.7

Development and Flooding - 16.13

The draft Local Plan recognises the need to ensure that the risk to flooding is an essential factor to take into account as part of the ongoing development of Crawley Borough, this is highlighted by sections 16.7 and 16.13. Importantly, these paragraphs state that development must be planned with flood risk in mind, both in terms of protecting Crawley residents, and ensuring that flood risk is not increased elsewhere.

In addition, the Local Plan recognises that climate change should form part of the assessment process when considering development in relation to flood risk. These are essential factors in ensuring that any future development could be considered as sustainable.

The Strategic Flood Risk Assessment (SFRA) and updated flood risk modelling for the Upper Mole Catchment are referenced within the draft Local Plan, Sustainability Appraisal, and also within the draft infrastructure plan. The updated flood risk modelling is likely to, in some areas, change the extent of the areas that are considered to be at risk to fluvial flooding from main rivers. We note that comment is made by Crawley in the draft plan that the SFRA and the Upper Mole modelling are currently being updated. Once these two items have been updated, this should be reflected with the draft Local Plan and its supporting evidence base.

Strategic Policy EP1: Development and Flood Risk **We support this policy**

The requirements of the NPPF and associated PPG Flood Risk and Coastal Change are interpreted within and incorporated into Strategic Policy EP1. The manner in which the draft Local Plan sets out the requirements of the NPPF and its associated Flood Risk and Coastal change PPG within EP1 appear to be reasonable.

Section 16.20 sets out the definition of Flood Zone 3b, this definition has been previously agreed with the Environment Agency.

Non-strategic Policy EP2: Flood Risk Guidance for Householder Development and Small Non-Residential Extensions

We support this policy

This sets out guidance for householder development and small non-residential extensions. The inclusion of this policy is welcomed, small scale development can have a negative cumulative impact on flood risk, as well as being at risk to damage that flooding causes. The requirement to provide a Flood Risk and Resilience Statement for these types of development offers clear guidance on how to approach

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smaller scale development at risk to flooding, whilst ensuring the information that needs to be provide is appropriate to the nature and scale of these types of development. It is noted that EP2 contains descriptions of the types of development that fall under this Policy, which should assist in determining when a full Flood Risk Assessment is needed, and when a Flood Risk and Resilience Statement is appropriate.

We welcome the reference in Policy GAT1 regarding flood risk in relation to the development of Gatwick Airport with a single runway. Areas of the Airport are at risk to fluvial flooding, additional areas with impermeable surfaces could also lead to an increase in the rate and volume of surface water runoff. Future development at the Airport will need to ensure that flooding can be managed on site and not increase the risk to flooding elsewhere.

Land Quality

Strategic Policy EP3 Land Quality

We support this policy.

We are pleased to note the inclusion of requirements to investigate, and if necessary, remediate potentially contaminated land, and to only permit development that has the potential to cause land or water contamination, with appropriate mitigation measures.

17. Sustainable Transport

Strategic Policy ST4 Safeguarding of a Search Corridor for a Crawley Western Link Road

We do not support the inclusion of the route option for the reasons set out below.

Policy ST4 has a significant potential clash with Willoughby Fields (LNR) and Local Wildlife Site.

It is therefore recommended that this site is highlighted on the proposals map and the safeguarding/search corridor is widened so that important wildlife areas can be avoided should the decision be taken to proceed with this proposal. At this stage we cannot support the inclusion of this route option due to the proposed search area.

SUSTAINABILITY APPRAISAL

Water resources and efficiency

In the table below para 5.11, "Reduction of Water Consumption" is one of the key topics, but there is no relevant assessment criterion.

References on p51 & p86:

Thames Water has published a "Revised draft Water Resources Management Plan 2019" and updates to it.

Southern Water has published a final "Water Resources Management Plan 2020–70"

South East Water has published a final "Water resources management plan 2019"

SES Water has published a "FINAL Water Resources Management Plan 2019"

Page 206 - Appendix A: Sustainability Objectives – To promote sustainable use of water resources and improving the quality of water bodies should one of the key sustainability objectives. Water resources and water quality are often forgotten because these issues are excluded when listing main objectives.

Page 195 - 15.43 *The EU Water Framework Directive establishes a framework for the protection of inland surface waters (rivers and lakes), transitional waters (estuaries), coastal waters and groundwater. The government has stated that the environmental protections arising from this and other EU legal instruments will remain in place after the UK leaves the European Union, and the 2018 '25 year Environment Plan' has announced the intention to improve 'at least three quarters of our waters to be close to their natural state as soon as practicable'¹³⁸. The council supports this work through the proper and sensible management of water in all new development.*

It is encouraging that the council supports protection of the water environment although this needs to be reflected further in the objective SD1 of the draft Local Plan.

Flood Risk

Due to the flood risk that exists within Crawley and the constraints in terms of available land for future development, ensuring that there is suitable and robust Policy to ensure that flood risk is suitably assessed and managed is essential. The inclusion of specific Policy within the draft Local Plan and the Sustainability Appraisal (SA) in relation to flood risk is noted and welcomed. The SA highlights that without specific local Policy related to flood risk management, National Policy and guidance, as well as Environment Agency advice, would be followed. However, Crawley have recognised that having local Policy would better inform future development proposals in terms of flood risk, especially in the face of climate change. This is welcomed, we are supportive of Crawley's approach in the choice of Option 2 for Policy EP1.

In terms of Policy EP2, the choice of Option 1 is also supported. This type of development can have a cumulative impact on flood risk, by providing specific guidance on smaller scale development it also offers those who wish to carry out, for example, householder extensions in flood risk areas, clear guidance on how to approach making an application.

We hope you find our comments useful. If you have any queries please do not hesitate to contact me.

Yours faithfully

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Planning Specialist

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