



# Crawley

Local Plan

Ref No:

Office use only

## Crawley Submission draft Local Plan Representation

Please return your completed representation form to Crawley Borough Council.

Representations can be made via this form and emailed to [strategic.planning@crawley.gov.uk](mailto:strategic.planning@crawley.gov.uk) or sent via post to: Local Plan Consultation, Strategic Planning, Crawley Borough Council, Town Hall, The Boulevard, Crawley, RH10 1UZ. Alternatively, representations can be made online using the [eform](#) which allows attachments of documents.

This form has two parts:

### PART A – Personal details

By law, representations cannot be made anonymously. All representations will be published alongside your name, company name (if applicable), and your client's name/company (if applicable). The Council will use the information you submit to assist with formulating planning policy.

Further information about Data Protection Rights in line with the provisions of the General Data Protection Regulations and Data Protection Act 2018, for example, how to contact the Data Protection Officer, how long information is held or how we process your personal information can be found at [www.crawley.gov.uk/privacy](http://www.crawley.gov.uk/privacy). Specific reference to the Local Plan and planning policy related public consultation can be found [here](#).

### PART B – Your representation

Please fill in a separate sheet for each representation you wish to make. You may submit multiple "PART B" sections with a single "PART A" completed.

## PART A – Personal details

Please ensure that you complete all fields in 1. If a planning agent is appointed, please enter the Title, Name and Organisation in 1, and complete the full contact details of the agent in 2.

	1. Personal details	2. Agent's details
Title:	<input type="text"/>	N/A
First name:	<input type="text"/>	<input type="text"/>
Surname:	<input type="text"/>	<input type="text"/>
Organisation:	CPRE Sussex	<input type="text"/>
Address line 1:	<input type="text"/>	<input type="text"/>
Address line 2:	<input type="text"/>	<input type="text"/>

Town/city:	<input type="text"/>	<input type="text"/>
Postcode:	<input type="text"/>	<input type="text"/>
Telephone:	<input type="text"/>	<input type="text"/>
Email:	<input type="text"/>	<input type="text"/>

## PART B – Your representation

### 3. Please tick the document that you would like to make a representation on:

- Crawley submission Local Plan
- Crawley submission Local Plan Map
- Crawley submission Sustainability Appraisal
- Habitats Regulation Assessment Screening Report

### 4. Which part of the Local Plan does this representation relate to?

Paragraph:	<input type="text"/>	Policy:	<input type="text" value="SDC4:Water&lt;br/&gt;Neutrality"/>	Other:	<input type="text"/>
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### 5. Do you consider the Local Plan to be: (Please tick)

- |   |   |  |
|---|---|--|
| 5.1. Legally compliant?                     | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/>            |
| 5.2. Sound?                                 | Yes <input type="checkbox"/>            | No <input checked="" type="checkbox"/> |
| 5.3. Compliant with the duty to co-operate? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/>            |

### 6. Please give details explaining your response to 5.1, 5.2, or 5.3 below. Please be as clear as possible.

#### 1. CPRE Sussex strongly recommends that Policy SDC4: Water Neutrality: stipulates that offsetting must be in place before water demand is generated, for instance before new houses are occupied.

1.1 Sussex North Water Neutrality Study: Part C – Mitigation Strategy Final Report, November 2022, stipulates that: “Offsetting must be in place before the water demand is generated, for instance before new houses are occupied. If it is not possible to provide sufficient offsetting, either because it cannot be delivered fast enough, or there is not enough available offsetting to meet demand, this will restrict the amount of growth that can go ahead” (paragraph viii).

1.2 This critical requirement is restated in the Crawley Borough Council Local Plan Review Sustainability Appraisal/Strategic Environmental Drat Report for the Submission Local Plan May 2023 (paragraph 6.31),

1.3 It is not, however, stipulated in the Crawley Submission Draft Local Plan Policy SDC4: Water Neutrality.

1.4 CPRE Sussex strongly recommends that the critical requirement that 'Offsetting schemes must be in place before the water demand is generated, for instance before new houses are occupied' be stipulated in the Policy.

**2. CPRE Sussex strongly recommends that to ensure that the defined target for water efficiency is met, Policy SDC4: Water Neutrality include the essential requirement for a targeted programme to raise awareness of why water saving is needed, and the correct use and maintenance of the fittings and fixtures installed.**

2.1 Sussex North Water Neutrality Study: Part C – Mitigation Strategy Final Report November 2022 stipulates:

"Setting a tighter standard for water efficiency does not guarantee that the eventual water-use in a development will be as expected, or that it will stay at the designed figure. Ensuring the defined target for water efficiency is met will also require an element of behaviour change. A targeted programme to raise awareness of why water saving is needed, and the correct use and maintenance of the fittings and fixtures installed is therefore required" (page vii).

2.2 This essential requirement for a 'targeted programme to raise awareness of why water saving is needed, and the correct use and maintenance of the fittings and fixtures installed' to ensure that the defined target for water efficiency is met is not stated in the Crawley Submission Draft Local Plan.

2.3 CPRE Sussex therefore strongly recommends that this essential requirement be stipulated in Policy SDC4: Water Neutrality.

Dr R F Smith DPhil, BA (Hons), PGCE, FRGS  
Trustee CPRE Sussex

**7. Please set out what modification(s) you consider necessary to resolve the issues you have identified above. You need to state why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to suggest how the wording of any policy or text should be revised. Please be as clear as possible. Any non-compliance with the duty to co-operate is incapable of modification at examination.**

Why the wording proposed below for addition to Policy SDC4: Water Neutrality would strengthen and thereby make sound the policy is explained above. The proposed wording is as follows:

i. Water offsetting schemes must be in place before the water demand is generated, for instance before new houses are occupied. And:

ii. To ensure that the defined target for water efficiency is met and water neutrality achieved Crawley Borough Council will initiate a targeted educational programme to raise awareness of why water saving is needed, and the correct use and maintenance of the fittings and fixtures installed.

*Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations. **After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues s/he identifies for examination.***

**8. If your representation is seeking a modification, do you consider it necessary to participate in the public examination hearings? (Please tick)**

No, I do not wish to participate  
in the examination hearings

Yes, I wish to participate in the  
examination hearings

**9. If you wish to participate in the public examination hearings, please outline why you consider this to be necessary:**

I have taken part in the Examination in Public of local plans. Participating enables one to present and explain concerns in person to the Inspector, to answer any questions arising and to ask questions and comment on the views of others through the Inspector.

*The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the public examination.*

If you would like to make a representation on another policy or part of the Local Plan then please complete a separate PART B section of the form or securely attach an additional piece of paper. Copies of the representation form can also be downloaded from the council's website at:  
[www.crawley.gov.uk/localplanreview](http://www.crawley.gov.uk/localplanreview)

**Signature**

**Date**

Completed form submitted by email

18 June 2023