

Home Builders Federation

Matter 8

CRAWLEY LOCAL PLAN 2024-2040 EXAMINATION

Matter 8: Character, design, and heritage

Issue 2: Whether the plan's approach to water neutrality and water stress is sound.

8.9 Is the proposed standard of water use in residential development of 85 litres/per person/per day justified and effective? Is the requirement viable in combination with the other policy requirements of the plan?

The Viability Study includes a £2,000 allowance to take account of all the costs relating to water neutrality including the 85 lppd. It is recognised that this additional cost alongside others in the local plan will impact on the viability of some typologies, especially where these cannot achieve the highest value points identified in the study. As we set out in our representations the Council has responded by including a variable rate for affordable housing between the town centre and the rest of the Borough. However, there is still some uncertainty of the costs relating to water neutrality, and indeed other costs in the current economic climate, means that the Council will need to provide flexibility in other policies given that Council require water neutrality to be achieved if development is to be considered acceptable.

8.10 The 85 l/p/d standard is a tighter efficiency standard than that contemplated in the optional technical standards in the PPG (para 56- 013-20150327). Is this standard the only realistic and reasonable solution to the water neutrality issue in the Sussex North Water Resource Zone? Have other options (standards) been assessed as part of the SA/SEA process?

For council.

8.11 Is it viable for industrial / commercial development to deliver a score of 3 credits within the water category of BREEAM in combination with mitigatory offsetting?

No comment.



8.12 Is it justified that the onus in the short to medium term (to c.2030) is on the development industry rather than the water utility company to demonstrate / achieve water neutrality?

The HBF is concerned that the development industry is being made to bear the brunt for the failure of the water industry to ensure an adequate supply of water to the area without it impacting on protected areas. Water companies have a duty to provide a supply of water to meet the needs not just of existing residents but also to plan for growth and ensure supply to meet demand in the future over a minimum period of 25 years. To achieve this the water companies are required to prepare Water Resource Management Plans (WRMP) which establish how these will be met. These are prepared in consultation with stakeholders including statutory bodies such as the Environment Agency and Natural England and include an appropriate assessment considering the impact of the plan on protected sites. The WMRP covering Crawley and the Sussex North Water Resource Management Zone was adopted in 2019 establishing that water supply for the areas future needs could be met.

Whilst the HBF recognises that there has been a change in circumstance with regard to Natural England concerns relating to the impact of abstraction at the River Arun on protected sites in the Arun Valley it is still incumbent on the water company to meet demand in the area as per their statutory duty. How this is achieved should not be a consideration of the development industry but for the water company in partnership with the Environment Agency and other statutory bodies.

However, unless this position is challenged, or changed by Government, it is necessary to ensure that development can come forward. The mitigation strategy proposed by Crawley and the other affected LPAs provides a mechanism for planning applications to be considered and development to come forward. However, this should not be seen as a permanent strategy. The Draft WRMP 2024 notes that Southern Water is planning to address the supply-demand balance in SNZ as quickly as possible and that the Littlehampton Water Recycling Scheme could from 2027–28 create sufficient supply-demand headroom to stop any reliance on the Pulborough groundwater source. Should other sources of water supply be found during the plan period or the impacts on the Arun Valley SPA from abstraction found not be harmful then it must be made clear that this will lead to a review of the local plan and this policy.

8.13 Noting that the Water Neutrality Part C Study cautions that offsetting must be in place before water demand is generated, when will the proposed offsetting scheme be operational and is this appropriately reflected in the housing delivery trajectory and employment trajectory? Is there any further update on delivery plan outlined at Appendix 1 to the Water Neutrality Progress Update (DS.TP.00b)?

No comment.

8.14 Is it that only development located within the Sussex North Water Resource Zone as shown on the Policies Map should provide details for offsetting? Do criteria 4 and 5

of Policy SDC4 apply to all development proposals and should criterion 4 come before criterion 5?

For council.

8.15 Is it necessary for soundness for Policy SDC4 to require offsetting to be in place prior to occupation of dwellings and commercial premises as set out in the Sussex North Water Neutrality Study Part C Mitigation Strategy Final Report, November 2022? Are the proposed amendments to paragraph 15.45 and Policy SDC4 presented in document CBLP07 sufficient to address the issue of timing of offsetting?

No comment.

8.16 Is it necessary for soundness to amend criterion 4 of Policy SDC4 to say there should be certainty that alternative water supplies can be secured?

No comment.

8.17 Various modifications are proposed to Policy SDC4 in document CBLP07. Are these changes necessary for plan soundness?

No comment.

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