

Sent by email to: [strategic.planning@ Crawley.gov.uk](mailto:strategic.planning@ Crawley.gov.uk)

20/06/2023

Dear Sir/ Madam

**Response by the Home Builders Federation to the consultation on the amendments to the Submission Draft of the Crawley Local Plan**

1. Thank you for consulting the Home Builders Federation (HBF) on the amendments to the submission draft of the Crawley Local Plan. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.
2. The key change to the local plan being proposed in this third regulation 19 consultation is the inclusion of policy SDC4: Water Neutrality. This policy is considered to be necessary to ensure that new development delivered through this local plan does not impact negatively on the quality of the protected sites in the Arun Valley and provides the basis for the implementation of the mitigation strategy set out in part c of the Sussex North Water Neutrality Strategy. In addition to this new policy the Council have also made some factual changes including the level of unmet needs arising from this local plan.

**SDC4: Water Neutrality**

3. The concern regarding the declining quality of the protected sites and the link that has been made to water abstraction within the Sussex North Water Resource Zone (WRZ) was raised by Natural England in 2021 and as a result a moratorium on development was placed on development in this area. Whilst the HBF



welcomes the efforts made by the Councils in this area to seek to mitigate the potential impacts on protected habitats arising from development to ensure that the pressing need for new homes in Crawley and its neighbours can be met we are concerned that responsibility for maintaining the quality of protected habitats is once again being placed on the development industry.

4. It is the responsibility of Southern Water to ensure a resilient and sustainable supply of water to support existing and future customers with the approach to achieving this being set out in the Water Resource Management Plan adopted in 2019. It is for Southern Water to identify a means of maintaining a level of water abstraction to ensure the delivery of new homes expected to be planned for in local plans without impacting negatively on any protected areas. Whilst Southern Water is working to reduce leaks in the water supply network it will fall on the development industry to ensure that the remaining capacity required to achieve water neutrality is delivered through a combination of water efficiency measures and offsetting.
5. Therefore, whilst the policy provides a mechanism for ensuring new development can come forward, we would question whether it should be necessary given that it is Southern Water's statutory responsibility to provide water for planned levels of new development without impacting negatively on protected habitats. Therefore, as the Local Plan progresses, should further evidence arise with regard to the impact of water abstraction on the protected sites or the role of Southern Water in ensuring a resilient water supply in the area, consideration may need to be given as to the necessity of this policy.
6. Therefore, in order to ensure the soundness of this policy the wording should be amended slightly to recognise that further evidence or alternative mitigation measures may be identified that removes the need for the policy and the requirement to offset water use as is proposed. The HBF recommends part 1 is amended to read, "*Subject to further evidence or alternative mitigation measures being secured ...*". This amendment will ensure the policy is sufficiently flexibility to take account of any changes in the situation with regard to water abstraction and the protected habitats.

7. Finally, to ensure this policy is deliverable it will be necessary for the Council to show that the proposed offsetting scheme will be operational prior to the adoption of the local plan. At present there is very little detail as to whether sufficient credits can be made available to support the delivery of this local plan as well as development expected to come forward in both Horsham and Chichester. This should be a priority for the Council and its partners.

### **Unmet housing needs**

8. In our initial representations on the local plan, we raised concerns that no up to date Statements of Common Ground establishing how the unmet needs of Crawley will be met in full had been published, an issue we considered to be unacceptable given that the Borough's unmet housing needs were increasing. Now that unmet needs have risen again, with paragraph 2.26 being amended to state that unmet needs are now approximately 7,050 homes compared to the 5,925 home shortfall in the first iteration of this plan, we would have expected further work to have been undertaken by the Council and their neighbouring authorities to agree to these needs being met elsewhere. However, the only statement of common ground that has been published still dates from 2020 and does not reflect the current position. If the Council are to show that they have co-operated effectively with their neighbours an updated statement of common ground setting out how unmet needs will be addressed must be agreed prior to the submission of this local plan.
9. We recognise that this may be challenging but it is necessary to ensure that the development needs of tightly bounded local authorities such as Crawley have their needs met elsewhere. Without the necessary agreement not only will the additional unmet needs identified through this local plan not be addressed but there is no guarantee that those needs agreed to be delivered elsewhere will not be delivered. It is therefore essential that a new statement common ground is agreed not only between Crawley, Horsham, and Mid Sussex but also other neighbouring authorities such as Mole Valley and Reigate and Banstead setting out how Crawley's growing unmet housing need will, in accordance with paragraph 11 and 60 of the NPPF, be met in full by its neighbours.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Mark Behrendt'.

Mark Behrendt MRTPI

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Home Builders Federation

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