



# 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:	Dr	N/A
First name:	Roger	
Surname:	Smith	
Organisation:	CPRE Sussex	
Address line 1:	Brownings Farm	
Address line 2:	Blackboys	

Town/city:	Uckfield	
Postcode:	TN22 5HG	
Telephone:	01825 890 975	
Email:	rogerfinch.smith@gmail.com	

## 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:	15.34 to 15.40	Policy:	SDC3: Tackling Water Stress	Other:	
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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.

CPRE Sussex is concerned that the plan seems not to recognise that whether Crawley Borough's need for potable water can be fully met over the plan period is uncertain, and therefore not assured. The plan should adopt a precautionary approach to this vital issue by explicitly acknowledging the uncertainty, for the reasons explained below.

#### Explanation

1. The plan acknowledges that 'The South East, including Crawley, is an area of serious water stress, whereby demand for water exceeds the available supply' (paragraphs 15.5, 15.23, 15,34).

2. The plan's underlying assumptions are that water consumption can be reduced to specified levels by the measures identified in the plan, notably by reducing consumption (paragraph 15.5, 15.9, 15.36, 15.40), and that water companies will have the capability, including water capture and storage capacity and delivery-infrastructure needed to meet Crawley's overall demand for potable water throughout the plan period.

3. Whether the identified measures will succeed in reducing the demand for potable water to a level not exceeding the available supply, and whether the water companies will be capable of meeting increasing demand over the plan period is, however, uncertain.

4. Sussex North Water Neutrality Study: Part C – Mitigation Strategy Final Report November 2022 states under the heading ‘Uncertainty in Southern Water figures’, at paragraph 114, that

“Although Southern Water are committed to their programme of water demand reduction through their current WRMP, there is a risk that the targeted reductions in per capita consumption published in their Water Resources Market Information tables (July 2020) may not be met. This could occur for several reasons, a recent example being Covid-19 causing a delay to the household visit programme. Drought and prolonged dry weather are also factors that have contributed to increased water demand”.

5. Meanwhile, across parts of Sussex and Kent, Southeast Water has been unable to meet demand, saying that prolonged dry weather over the last six weeks had placed extra pressure on local supply. Consequently, households, schools and businesses were without tap water, and a hosepipe ban has been imposed.

[https://www.bbc.co.uk/news/articles/c809155nk65o?at\\_medium=RSS&at\\_campaign=KARANGA](https://www.bbc.co.uk/news/articles/c809155nk65o?at_medium=RSS&at_campaign=KARANGA)

6 Last year during the prolonged drought some communities in both East and West Sussex and Surrey had their water supplies cut off leaving residents without tap water for several days.

7 Note, too, the report featured in the Guardian (15 June 2023): ‘Drought is on the verge of becoming the next pandemic’) that Andrew Tucker, water efficiency manager at Thames Water reportedly advised the news paper that quote “in London and the south-east, “we basically don’t have enough product, going forward. Ultimately, we will need to bring new water supply into the system ... All water companies in the UK rely on winter rainfall to recharge these systems ... If we don’t get that winter recharge, it just drops and keeps on dropping, because our raw water storage [reservoirs] is actually quite small”.

<https://www.theguardian.com/news/2023/jun/15/drought-is-on-the-verge-of-becoming-the-next-pandemic?ref=upstract.com>

7.1 On 3<sup>rd</sup> May this year, the BBC News reported that ‘An estimated 3,000 properties have been affected by water supply issues in Surrey. Residents in parts of Chiddingfold and Dunsfold have reported no water or low pressure on Wednesday. Thames Water has said its Ashlands Reservoir is out of service after a technical issue at Mousehill Water Treatment Works, late on Tuesday. Thames Water also said there were technical issues at Netley Mill Water Treatment Works in the early hours of Tuesday’.

[https://www.bbc.co.uk/news/articles/c5148j9l3x1o?at\\_medium=RSS&at\\_campaign=KARANGA](https://www.bbc.co.uk/news/articles/c5148j9l3x1o?at_medium=RSS&at_campaign=KARANGA)

7.2 On 31 August 2022, BBC News reported that ‘People in parts of Surrey have no water or low pressure, on one of the hottest days of the year. Thames Water said there were technical issues at Netley Mill Water Treatment Works and the fix was "taking longer than we hoped". A spokesman apologised, adding: "We know how disruptive and worrying it is to be without water."

<https://www.bbc.co.uk/news/uk-england-surrey-62532910>

8. On 14<sup>th</sup> May this year, BBC News reported that ‘A failure at a water supply plant has left properties across West Sussex with little or no water. Southern Water said the outage followed low levels of chlorine at its Hardham water supply works. The company said 20,000 customers were affected and expected the number to grow to 40,000 throughout Sunday. The company had said Horsham, Billinghamurst, Broadbridge Heath, Pulborough, Codmore Hill, West Chiltington, Wisborough Green, Rudgwick, Loxwood, Barns Green and Slinfold had all had supplies disrupted’.

<https://www.bbc.co.uk/news/uk-england-sussex-65588380>

## Conclusion

9. CPRE Sussex recommends that as a precautionary measure the uncertainty as to whether Crawley Borough’s need for potable water can be fully met over the plan period, 2024 – 2040, be acknowledged and stated in the plan.

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.**

To make the policy sound, CPRE Sussex recommends that as a precautionary measure the uncertainty as to whether Crawley Borough’s need for potable water can be fully met over the plan period, 2024 – 2040 be acknowledged and stated in the plan. Suggested wording to convey this uncertainty is:

‘There is uncertainty as to whether Crawley Borough’s need for potable water can be fully met over the plan period, 2024 – 2040’.

*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**

I submitted this completed form  
by email

**Date**

18 June 2023