

Sent by email to: strategic.planning@ Crawley.gov.uk

29/06/2021

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.

Plan period

2. The HBF welcomes the extension of the plan period to 2037. This reflects paragraph 22 of the NPPF requiring strategic policies to look ahead over a minimum of 15 years.

DD2: Inclusive design

3. The HBF agree with the amendment to this policy removing the requirement for 5% of homes to be built to part M4(3). However, we remain concerned, as set out in our previous representations, that the Council have not justified that all homes be built to part M4(2).

H5: Affordable housing

4. The HBF agrees with the proposed amendment to reduce the level of affordable housing contributions within the town centres on the basis of the latest viability study. However, we do have some concerns that the assessment has not included the cost of providing electric vehicle charging points, a requirement of policy ST2, in the viability assessment. Given the sensitivity of development viability in Crawley it is important that all costs are considered fully in order to ensure that further amendments to other policies are not necessary to support the affordable housing requirement set out in H5.
5. The Council will need to consider whether it would be appropriate to include the requirement that 25% of affordable homes are delivered as First Homes in this policy. Whilst the Written Ministerial Statement and PPG set out the transitional arrangements that do not require the Council to include the 25% First Home requirement in their affordable housing policy Planning Practice Guidance (PPG)



does state at paragraph 70-019 that Inspectors may wish to consider at the examination of a local plan whether an early update of the plan would be appropriate to take account of this change to national policy. Rather than include a requirement for an immediate review of the local plan to amend policy H3 we would suggest that the requirement is included prior to the plan being submitted for examination.

G13: Biodiversity Net Gain

Policy is not consistent with national policy.

6. The Council are proposing in this policy to require a minimum net gain in biodiversity of 10%. The HBF recognises that should the Environment Bill become an Act then development will be required to achieve this level of biodiversity net gain, however until this legislation is enacted the NPPF states at paragraph 175 development should be encouraged to incorporate biodiversity improvements where this can secure measurable net gains. Whilst we understand the Council's desire to adopt the proposed level of net gain in the Environment Bill it must also be remembered that this Bill includes provisions to allow a transitional period with regard to the application of the proposed net gain requirements. In addition, the Government are still to decide whether smaller developments will be required to deliver 10% net gains. As such requiring a 10% from the adoption of this local plan may not be consistent with provisions of the final Act.

ST2: Car and Cycle Parking

The policy is unsound as it has not been justified.

7. No allowance has been made for the requirement to provide electric vehicle charging points (EVCP) as set out in policy ST2 Car and Cycle Parking Standard (and the relevant annex at page 277). The Government has estimated installation of such charging points add an additional cost of approximately £976 per car parking space for an average home. In addition, there is the concern that the introduction of EVCP in new buildings will impact on the electricity demand from these buildings especially for multi-dwelling buildings. A requirement for large numbers of EVCPs will require a larger connection to the development and will introduce a power supply requirement, which may otherwise not be needed. The level of upgrade needed is dependent on the capacity available in the local network resulting in additional costs in relation to charge point instalment. Any such additional infrastructure requirements would likely see average S106 infrastructure costs increased from the Council's current estimates. As the additional costs of EVCPs have not been included in the viability study we would suggest that this is addressed prior to submission.
8. Alongside the costs being tested we would also question whether this policy is necessary given that it is likely to be superseded by national policy. The HBF is supportive of encouragement for the use of electric and hybrid vehicles. However, we consider the most effective approach to delivering the transition to greater electric vehicle use is via a national standardised approach implemented through

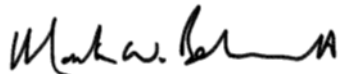
the Building Regulations to ensure a consistent approach to future proofing the housing stock.

9. The Department for Transport held a consultation on Electric Vehicle Charging in Residential & Non-Residential Buildings, this consultation set out the Government's preferred option to introduce a new functional requirement under Schedule 1 to the Building Regulations 2010. The inclusion of EVCP requirements within the Building Regulations will introduce a standardised consistent approach to EVCP in new buildings across the country. Given that such requirements are likely to be included in Building Regulations, and that there has been no viability testing at this stage the HBF would recommend that this policy is deleted as it will be unnecessary and repetitious.

Conclusion

10. At present we do not consider the plan to be sound, as measured against the tests of soundness set out in paragraph 35 of the NPPF. As such I can confirm that I wish to participate in the relevant hearing sessions in order to full represent our concerns which reflect the views of discussions with our membership who account of 80% of the market housing built in England and Wales.

Yours faithfully



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