

Horsham Local Plan 2023-2040 Examination

Matter 3: Climate Change and Water

Issue 2: Whether the approach to water neutrality and flooding is justified, effective, consistent with national policy and positively prepared?

Q.1: Is Strategic Policy 9: Water Neutrality sound?

- a) Is the geographical application of this policy accurately identified on the submission Policies Map?
- b) Is the restriction for residential development of 85 litres of mains supplied water per person per day justified and effective?
- c) Is it clear how this policy would be applied to non-domestic buildings?
- d) Is the approach to water off setting justified and effective? Has any further progress been made on implementing the Sussex North Offsetting Water Scheme? When realistically is it likely to be in place? Will it be effective?
- e) Has achieving water neutrality been adequately assessed as part of the viability evidence and is this policy flexible enough to deal with changes in circumstances with regard to water neutrality?

1. No, the Plan is not sound with respect to this Matter.
2. Notwithstanding the points raised within the Regulation 19 representations (representor ref. 1211284) and by the Home Builders Federation in its Hearing Statement regarding the responsibility to deal with the water neutrality matter, the Plan is not conducive to delivering development that can be demonstrated to be water neutral.
3. Strategic Policy 9 states that new development would need to demonstrate water neutrality through ensuring a water efficient design and offsetting water use. With respect to the latter, criterion 1c) of Strategic Policy 9 states:

“Development proposals must demonstrate that having achieved water efficient design, any mains-supplied water use from the development is offset such that there is no net increase in mains-supplied water use within the WRZ compared with pre-development levels.”
4. Criterion 4 of the policy then states:

“Development proposals are not required to utilise the local authority-led offsetting scheme and may bring forward their own offsetting schemes.”
5. We support this approach set out in Criterion 4.
6. However, as identified within our Matter 1 Statement, the water neutrality constraint has heavily informed the Duty to Cooperate discussions, and the Council’s conclusion that it cannot accommodate any unmet needs. This is confirmed at paragraph 4.9 of the Plan.

7. Further to this, paragraph 4.19 of the Plan identifies that water neutrality is the reason for the Plan not meeting the minimum Local Housing Need. Southern Water has confirmed that this relates specifically to the capacity of the Sussex North Offsetting Water Scheme (“SNOWS”)¹. Indeed, the SNOWS is yet to be made publicly available and it is not yet clear whether it is deliverable.
8. As discussed within our Matter 2 Statement, the policies of the Plan do not facilitate the delivery of development beyond the constrained level planned for where appropriate mitigation through means other than SNOWS can be secured to achieve water neutrality.
9. Accordingly, some provisions of Strategic Policy 9 would be redundant as a consequence of the unjustified restrictions imposed through other policies of the Plan.

¹ [water-neutrality-in-sussex-north-oct-2023-qa-1.pdf](#)



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