



Examination Statement

**Prepared on behalf of Bellway Homes
(Representor Number #1198095 and #1194675)**

Former Thakeham Mushroom Site

Horsham District Council Local Plan
Examination in Public

Matter 3: Climate Change and Water

Examination Statement

Former Thakeham Mushroom Site, Thakeham



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Examination Statement

Former Thakeham Mushroom Site, Thakeham



1. Introduction

- 1.1. This Examination Statement has been prepared on behalf of Bellway Homes Ltd ('Bellway'). This Statement relates to the Former Thakeham Mushroom Site ('The Site') which is situated to the west of Storrington Road in Thakeham.
- 1.2. Prior to the submission of the Horsham District Council Local Plan to the Planning Inspectorate for examination, Bellway has participated in the formal consultation of the Local Plan at the R19 stage (January - March 2024) in respect of the Site. Two sets of R19 representations were submitted which relates to a smaller site which encompasses the built area of the Former Mushroom Site (13.45ha) and a wider site included adjacent fields (30.1Ha) This Examination Statement should be read in conjunction with the R19 representations.
- 1.3. The location of the Site, its surroundings and the vision have been set out in detail at the R19 Stage and have therefore not been reproduced in detail in this statement (see Section 2 of the Representations).
- 1.4. This Examination Statement responds to the relevant questions raised by the Inspector within Matter 3: Climate Change and Water.
- 1.5. For the avoidance of doubt, any policies referred to within this Statement relate to the emerging Local Plan unless otherwise stated.

2. Response to the Inspectors Questions

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?

Q1 - Is Strategic Policy 9: Water Neutrality sound?

- 2.1. It is Southern Water’s statutory requirement under the Water Industry Act 1991, to ensure that homes are serviced with potable water and should not be a concern for the development industry. Thus, ensuring that the abstraction of water from Hardham does not impact on the protected sites at Arun Valley is the responsibility of Southern Water.
- 2.2. Notwithstanding this, Bellway accept that HDC has considered the situation as per the Natural England Position Statement (September 2021). However, the impact to the housing growth strategy (Strategic Policy 37) and offsetting requirements will have a long lasting impact on the District which have significant social, economic and environmental implications. The Impacts to housing are explored in the R19 representations and the Examination Statement to Matter 8.
- 2.3. Strategic Policy 9 sets out how development proposals can come forward in this area and introduces SNOWS. SNOWS will support development that is supported by Local and Neighbourhood Plans and will be managed by HDC. To ensure that Strategic Policy 9 is effective, a review mechanism should be incorporated.
- 2.4. Part 4 of the policy explains that proposals can bring forward a bespoke solution. This solution, however, will need to have regard to SNOWS and associated documents. It is not clear how or why this is required and HDC has not provided justification on this matter. The former Thakeham Mushroom Site is able to deliver a bespoke water offsetting solution either through the existing mains usage or via a licensed borehole and would not be reliant on SNOWS. Thus, should not need to have regard to SNOWS or any other strategic solution at all. In this regard, Strategic Policy 9 is not effective.

AMENDMENT REQUIRED:

Part 4 of Strategic Policy 9 should be amended to allow developments to proceed with bespoke water neutrality solutions without regard to SNOWS or any other strategic solution.

3. Conclusion

- 3.1. This Examination Statement has been prepared by Savills on behalf of Bellway Homes Ltd in relation to Matter 3 of the HDC Local Plan Examination. These comments should be read in conjunction with the R19 Representations (reference ID: #1198095 and #1194675) that were submitted in March 2024.
- 3.2. Bellway reiterates that offsetting water to resolve the impact caused to the Arun Valley SPA, SAC and Ramsar should not fall to the development industry. Instead, it falls within the remit of Southern Water under their statutory duties.
- 3.3. Notwithstanding this, should Strategic Policy 9 remain within the HDLP, it is requested that the policy is amended to allow a bespoke water neutrality solution to come forward without needing to have regard to SNOWS or an alternative strategic solution.

Appendix A

Glossary

GLOSSARY

HDC	Horsham District Council
HDPF	Adopted Horsham District Planning Framework 2015
HDLP	Horsham District Council Local Plan
NPPF	National Planning Policy Framework
R18	Regulation 18
R19	Regulation 19
SAC	Special Area of Conservation
SPA	Special Protection Area
SHELAA	Strategic Housing and Employment Land Availability Assessment
SNOWS	Sussex North Offsetting Water Scheme
SNWRZ	Southern North Water Resource Zone
WSCC	West Sussex County Council

