

Examination of the Horsham District Local Plan 2023-2040

Further Statement in Respect of

Matter 3: Climate Change and Water

Submitted on behalf of:

Wates Developments Limited

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Document Management

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1 Introduction

- 1.1 This Matter Statement has been prepared on behalf of Wates Developments Limited (Wates) in response to Matter 3: Climate Change and Water, specifically in response to Strategic Policy 9 Water Neutrality.
- 1.2 Wates has interests in the District across 5 no. sites as set out below, and has submitted representations at earlier stages of Plan preparation at the Regulation 18 and 19 consultations:
- Land west of Worthing Road, Tower Hill, Horsham (Southwater Parish)
 - Land west of Centenary Road, Southwater (Shingley Parish)
 - Land east of Marringdean Road, Billingshurst
 - Land west of Shoreham Road, Small Dole (Henfield Parish)
 - Land north of Melton Drive, Storrington
- 1.3 Two of the above sites are allocated for residential development in the Submission Plan these are:
- Land west of Shoreham Road, Small Dole (Strategic Policy: HA16 (SMD1))
 - Land north of Melton Drive, Storrington (Strategic Policy: HA18 (STO1))

2 Matter 3, Issue 2: Whether the approach to the water neutrality and flooding is justified, effective, consistent with national policy and positively prepared?

Q1 Is Strategic Policy 9: Water Neutrality sound?

a) Is the geographical application of this policy accurately identified on the submission Policies Map?

2.1 No. The Water Neutrality Area shown in the “Policies Map, Introduction, List of Inset Maps, Index Map Water Neutrality Map and Key” of the submitted plan is not the same as that shown on the Sussex North Water Resource Zone plan on page 27 of the Joint Topic Paper “Water Neutrality: Policy Update” of May 2023 (CC14). The latter shows the Upper Beeding WRZ whereas the former doesn't.

b) Is the restriction for residential development of 85 litres of mains supplied water per person per day justified and effective?

2.2 Yes. The 85 l/p/d restriction is an effective way of trying to reduce water consumption for residential development and should increase the amount of residential development that can be delivered by the Sussex North Offsetting Water Scheme (SNOWS). This is set out in paragraph 86 of the Sussex North Water Neutrality Study Part C – Mitigation Final Report (December 2022) (CC11) which states that **“If the 110 l/p/d target were to be maintained, 6,345 new dwellings could be built in Sussex North up to 2030 whilst not increasing abstraction at Pulborough (after SW's contribution and before Offsetting). This increases to 8,335 if the more ambitious target of 85 l/p/d were adopted”**.

2.3 In most cases the 85 l/p/d target is achievable but it will financially be more expensive to implement compared to a 110 l/p/d target. In some cases it could effect a schemes viability which will need to be taken into account. Overall, however, it will create greater water efficiency and make SNOWS capacity stretch further i.e. an additional 1,990 of dwellings can be delivered if the 85 l/p/d target is achieved. The 85 l/p/d target was the subject of discussion at the recent Examination into the Crawley Borough Local Plan and in that case the Inspectors in their Report dated 6 September 2024 were satisfied that the 85 l/p/d target was appropriate.

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?

2.4 As set out in Wates Regulation 19 Consultation comments on the approach to Water Neutrality it is important to recognise that it is ultimately the responsibility of water companies, working with local authorities and the Environment Agency, to plan for the future of water services relating to the development requirements proposed in local plans. If however the water company is unable to meet its supply commitment through having an up to date Water Resources Management Plan (WRMP). then Wates agree that the local planning authority must address this issue in its Local Plan. If this is not addressed by the local plan then the only conclusion is that the plan would not be sound.

- 2.5 The main approach put forward by the District Council to water offsetting is set out in reference CC11 **“Water Neutrality Study - Part C: Mitigation Strategy (December 2022)”**. This document supersedes the information presented in Water Neutrality Studies Part A (CC09) and Part B (CC10). The Part C Study in effect sets out details of a Local Planning Authority (LPA) led Offsetting Scheme i.e. what it entails, how it would be operated and for how long.
- 2.6 Section 5.3 of the Part C Study considers various offsetting measures which would reduce water consumption. These measures include fitting flow regulators; instigating a schools water efficiency programme; household and non-household rainwater harvesting; golf course irrigation; household and non-household visits; household and non-household retrofit greywater recycling; leakage reduction and metering; and indicative costs for their implementation. The concept of introducing water efficiency measures is a valid approach and generally supported by Wates.
- 2.7 In addition to the SNOWS LPA-led offsetting scheme the role of bespoke developer led offsetting schemes should not be under estimated. This is acknowledged in Section 6.5 of the Part C report which refers to there being scope for developers to propose their own offsetting options, or for third party market led schemes to be implemented alongside the LPA led scheme. This approach has the benefit of making SNOWS capacity last longer and the delivery of additional housing schemes (especially as windfall developments do not benefit from access to SNOWS) and as priority is currently given to development that is identified in or required to support Local Plans i.e. schools, essential infrastructure and public services) (Para 217 of CC11).
- 2.8 It is important to note that paragraph 181 of CC11 confirms that significant offsetting will be required early in the plan period and needs to be funded. Ideally this would be provided by the operation of SNOWS but this LPA-led offsetting scheme is not yet operational. There have been constant delays in implementing SNOWS. This is demonstrated by paragraph 82 of an appeal decision (APP/Z23825/W/22/3308455 - Land west of Ravenscroft, Storrington) of 6th October 2023 which refers to SNOWS being operational from January 2024 but this is clearly not the case. According to Background Evidence document ref CC16 ‘*SNOWS Project Review (May 2024)*’ the scheme should be launched in November 2024’ but at the time of writing this statement it has still to be published. This means there is continuing uncertainty about the schemes overall capacity; whether capacity will be restricted across certain parts of SNWRZ, how many water credits will be available in the early parts of the plan period and the likely financial contributions required from developers to access the scheme. This situation reinforces the need for and the importance for developers to put forward developer-led bespoke offsetting for development proposals. This will increase the prospect of some meaningful delivery of new homes in the early phases of the plan especially if the implementation of SNOWS is delayed further.
- 2.9 Examples of developer led bespoke private offsetting schemes that in some cases have been acceptable include:
- Private on-site boreholes;
 - Offsite agricultural related offsetting measures such as incorporating rainwater harvesting from large agricultural buildings and using collected water for livestock to drink instead of using mains water (Dedisham Farm, Rudgwick);
 - Offsite rainwater harvesting at the Hillier Garden Centre, Horsham. The collected rainwater would be used to water plants instead of using mains water;

- New groundwater abstraction (boreholes) at South Lodge Hotel, Upper Beeding; and
 - Installing water efficiency measures for bottle rinsing, bottle filler and keg sterilisation processes, plus rainwater harvesting for ancillary water uses at Hepworths Brewery, Codmore Hill, Pulborough.
- 2.10 The process of developer-led bespoke offsetting has already begun and has been accepted in principle by HDC through the grant of planning permission or resolutions to grant permission for a number of residential developments including:
- DC/22/1815 - 35 dwellings at Brook Hill, Cowfold which proposed private boreholes
 - DC/20/2607 - 83 dwellings on land at Duckmoor, East Billingshurst which proposed off-setting at a dairy farm
 - DC/21/2086 - up to 78 homes on land west of Ravencroft, Storrington which proposed rainwater harvesting at Garden Centre near Horsham
 - DC/23/0290 - 62 dwellings at Downsview Avenue, Storrington which proposed the implementation of water efficiency measures at a private hotel
 - DC21/2466 - 65 dwellings at Codmore Hill Pulborough which proposed water efficiency measures at a local brewery
- 2.11 Whilst some of the above permissions were on sites allocated for development in Development Plans and would in theory have access to SNOWS, others (including Duckmoor, Billingshurst and Codmore Hill, Pulborough) were speculative schemes which would not have SNOWS priority access. The proposed bespoke developer led offsetting for the above schemes means that 323 new homes can be delivered in the early years of the plan period without reducing SNOWS capacity (making it go further) and also increasing the housing land supply in the district. This demonstrates the important role that developer-led bespoke offsetting schemes can play in the supply of housing. The Wates site at Small Dole could potentially use an on-site private borehole whilst the rest of its Horsham land portfolio is likely to require water credits such as SNOWS or a private bespoke offsetting scheme(s) depending on availability.
- 2.12 The proposed dwelling requirement of 13,212 homes (approx. 777 dwellings per annum (dpa) across the plan period) is significantly below the current standard method figure of 917dpa. As is explained in greater depth in the Matter 8 statement submitted on behalf of Wates, the sole reason for this under provision is the current constraint of needing to demonstrate water neutrality. This means the proposed dwelling provision has been set in the context of SNOWS capacity i.e. an LPA-led offsetting scheme and does not take into account the potential for developer-led bespoke offsetting schemes such as boreholes, water credits and other individual offsetting measures. Had developer-led bespoke offsetting been taken into account a higher housing requirement could be achieved.
- 2.13 Overall, Wates is generally supportive of the approach to offsetting. In the first instance priority should be given to implementing the proposed offsetting measures set out in the draft WRMP 2024 by Southern Water. In the West Sussex and Brighton & Hove Areas potential new water sources being explored include:
- Groundwater options in Petersfield, Petworth and West Chiltington from 2031;
 - A water recycling scheme near Littlehampton to transfer water to the Pulborough area by 2031;

- Water transfers from neighbouring water companies;
- A new reservoir near Henfield to store water from the River Adur; and
- A desalination plant near the tidal River Arun.

2.14 As set out in Wates representations on Water Neutrality at the Regulation 19 stage, maintaining an appropriated water supply is the statutory responsibility of the water authority and the burden of achieving water is not the responsibility of the development industry. Wates recognises that it will take time to deliver some of the offsetting measures in the draft WRMP 2024 and in the interim acknowledges and supports the LPA led offsetting approach (SNOWS) which is also taking time to implement.

2.15 As a result of the above, greater importance should also be given to the role of developer-led bespoke offsetting schemes can play (in tandem with the WRMP schemes and SNOWS), as it will enable the delivery of additional new development in the early years of the plan time period. This would not be the case if developments relied solely on the implementation of the WRMP and LPA-led offsetting schemes.