



Examination of the
Horsham District Local Plan 2023-2040

**MATTER 3, ISSUE 2: CLIMATE CHANGE AND
WATER/WATER NEUTRALITY**

HEARING STATEMENT

Prepared by Blue Fox Planning Ltd on behalf of:

Richborough

Representation Numbers: 1207902, 1211480 and
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1. Introduction

1.1 This Hearing Statement has been prepared by Blue Fox Planning Ltd on behalf of Richborough. This Statement has been prepared in response to Matter 3 – Climate Change and Water. Specifically, this Statement addresses Issue 2, Question 1 of Matter 3 which considers whether Strategic Policy 9: Water Neutrality is Sound.

1.2 Richborough control two sites within Horsham District, these being:

- Land at Glebe Farm Steyning; and
- Land off Coneyhurst Road, East of Billingshurst

1.3 With regards to **Land at Glebe Farm Steyning**, the Inspector will be aware that this site is included within the Submitted version of the Local Plan under Strategic Policy HA17: Steyning Housing Allocation.

1.4 As detailed in other Statements prepared on behalf of Richborough, the Glebe Farm site was subject to an outline application submitted September 2021. The submission of the planning application coincided with the publication of Natural England's Position Statement on Water Neutrality which was received by the Council on 14th September 2021. As a consequence of this and Natural England's Advice Note of February 2021, a great deal of time and resource has been put into devising a water neutrality solution for the Glebe Farm proposals. Richborough therefore now has extensive experience of the water neutrality issue.

1.5 The application was presented to the Council's Planning Committee South on 26th September 2024 when Members resolved to support the Officers recommendation for approval. The Officer's Report on the application noted at paragraph 6.146:

"The Applicant is proposing a Water Neutrality Strategy which comprises a mix of avoidance and mitigation measures to be provided in perpetuity through i) reducing on-site water consumption to 80 l/p/d by the use of water-efficient fixtures and fittings to be secured via planning condition and evidenced by utilising the latest Part G water use calculation; and ii) rainwater harvesting to a minimum of 40% of the dwellings (107 units); and iii) offsetting the proposed additional water demand by utilising existing and proposed water reduction savings at Orchard Farm, Emms Lane, Brooks Green in Horsham District. This offsetting is to be secured via a Section 106 Agreement..."

1.6 In conclusion on the matter of water neutrality, paragraph 6.163 of the Officer's Report states (Blue Fox emphasis):

"The Council has completed the HRA exercise and its Appropriate Assessment concludes that subject to conditions and obligations to be secured in a legal agreement, the project will not have an Adverse Effect on the Integrity of the Arun Valley Site, either alone or in

combination with other plan and projects. Natural England concurs with the findings and conclusions of the Council, subject to all mitigation measures being appropriately secured, and raises no objection on this basis.

- 1.7 Given question (d) of this Examination Issue, it is important to note that whilst the site would potentially have formed part of the overall supply to be delivered by the SNOWS scheme (being an allocated site), it will be built out utilising a solution wholly without the use of any credits to be delivered by SNOWS. These credits will therefore be available for other developments.

2. Matter 3, Issue 2 – Climate Change and Water

Matter 3, Issue 2

“Whether the approach to water neutrality and flooding is justified, effective, consistent with national policy and positively prepared?”

Question 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.

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

2.1 We have reviewed the online version of the Policies Map and have been unable to find a legend for the Water Neutrality – Water Resources Zone. We note that the Councils website advises that:

“PDF maps are also available to view under ‘Consultation Documents’ - the Index Map and Water Neutrality Map should be viewed alongside each individual Inset Map to ensure all relevant policies are identified.”

https://strategicplanning.horsham.gov.uk/Regulation_19_Local_Plan/consultationHome - accessed through the Examination webpage).

2.2 It therefore appears that the geographical application of Strategic Policy 9 is not shown on the Proposals Map and, instead, one must refer to a separate document. This should be rectified given the nature and significance of the Policy.

- 2.3 Given the above, it is difficult to determine the accuracy of the Water Neutrality Map. For example, we have seen no evidence to confirm why the boundaries of the Neutrality Map are where they are and it is unclear whether those boundaries accord with the physical infrastructure.

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

- 2.4 Whilst we acknowledge that the 85 litre target may be technically achievable, indeed Richborough have demonstrated 80 litres person per day in respect of the Glebe Farm Steyning site, this does not mean that it has been justified as being appropriate and/or necessary.
- 2.5 The Local Plan should, in our opinion, clearly set out the basis for the 85 litre per day figure and explain how it has been tested. The Plan should also demonstrate that how it will be effective and fit for purpose in the longer term. For example, paragraph 5.33 refers to the fitting of “*water efficient appliances (in particular, washing machines and dishwashers)*” but it is not clear how the policy will ensure that such appliances (or equivalents) remain in place for the long term, for example, should a homeowner decide to replace them through consumer choice.

c) Is it clear how this policy would be applied to non-domestic buildings?

- 2.6 The Policy text makes reference to how non-residential buildings will be required to achieve 3 credits within the BREEAM water issue category but neither the policy nor its reasoned justification provide an explanation as to what this means or the implications for a non-residential development; for example, in terms of achieving a 40% reduction compared to baseline standards equating to a consumption of 30 litres per person per day. This aspect of the Plan should be given greater clarity for the reader.

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?

- 2.7 Given that the water neutrality issue has now been known about for some time, it is perhaps disappointing that more progress has not been made (by all parties) in finding a solution. For example, the dates for the implementation of the Sussex North Offsetting Water Scheme (SNOWS) have been repeatedly pushed back since its inception, with the most recent date given to be early next year.
- 2.8 There is also some concern as to the delivery of the initial credits within the SNOWS scheme given that a large proportion of “forward fund” credits in the scheme will come

from Southern Water, who have already had to revise substantially their published WRMP.

- 2.9 It is to be hoped that the Council, through its Examination Statements, will provide a positive update on the timescales for implementing SNOWS as, without this, it is difficult to assess its effectiveness. Further, it is unclear from the HDLP evidence base as to whether SNOWS will have the capacity to deliver sufficient off-setting to meet the needs of development in the District.
- 2.10 It is important to note that whilst the Richborough site at Glebe Farm Steyning would potentially have formed part of the overall supply to be delivered by the SNOWS scheme (being an allocated site), it will be built out utilising a solution wholly without the use of any credits to be delivered by SNOWS. These credits will therefore be available for other developments.
- 2.11 Finally, we have concerns as to how access to credits resulting from SNOWS will be managed. It is our view that this should be based on the planning merits of a development proposal rather than becoming a development management tool to unnecessarily restrict development. Further, there is concern that SNOWS will also provide credits to other, competing, developments within Chichester and Crawley. The Plan should provide clarity, therefore, on how credits will be allocated.

e) Has achieving water neutrality been adequately addressed as part of the viability evidence and is this policy flexible enough to deal with changes in circumstances with regard to water neutrality?

- 2.12 We do not consider that the viability implications of water neutrality have been fully understood in the Plan and its evidence base. This is particularly in respect of circumstance such as those that existed at Glebe Farm Steyning where a water neutrality solution had to be found outside of SNOWS. This took up a great deal of time and resources and ultimately will have caused significant delays to bringing forward development on an otherwise suitable and deliverable site.
- 2.13 We are also concerned that the Plan should fully understand the implications of water neutrality in conjunction with other requirements; for example the Plan's approach to Biodiversity Net Gain including the proposed requirement for a minimum gain of 12%. Taken comprehensively, such requirements may have a real impact on the viability of some sites.