

1. Introduction

- 1.1 This Examination Statement is submitted by Reside Developments. Reside Developments are in control of a number of sites within the District, including two proposed allocations and a committed site.
- 1.2 Reside's Representations to Horsham District Council (HDC) Regulation 19 Local Plan consultation were submitted by Reside Developments and Stantec on behalf of Reside Developments. Representation Numbers, 1194238, 1194243, 1194248, 1194251, 1194253, 1194255, 1194258, 1194259, 1194263, and 1194264.

2. Response to Inspectors Initial Matters, Issues and Questions on Matter 2 Issue 2**Matter 3, 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?

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

- 2.1 No – it should be shown on the policies map. The zone has been defined and is available online elsewhere, but should also be included on the policies map as it is essentially a designation.

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

- 2.2 Yes, Reside believes this figure is achievable and has demonstrated this through a number of planning applications. This figure is also easily achievable for new homes. Reside has achieved lower, but 85 litres is a sound new level to set as the maximum, allowing lower to be achieved if wanted.

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

- 2.3 No comment.

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 Yes. The water off setting has been tested at several appeals now and has been found to be justified and 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?

- 2.5 It is for the council to answer whether water neutrality has been adequately assessed as part of their viability evidence. However, the delivery of a water neutrality mitigation scheme is a serious additional financial load on the development economics of a site and its financial, time

and land use costs should not be underestimated. The current costs being experienced are £10-15,000 per home.

- 2.6 In respect to the flexibility of the policy, from our experience of delivering three different offsite mitigation schemes, we generally believe the policy has the right level of restrictions and flexibility. However, we believe there could be a case for offsetting scheme being outside the catchment area (point 5 of policy SP9), but cannot divulge those currently, but believe the policy needs to allow for such instances, where they can be demonstrated to the satisfaction of the council and Natural England.

Q2. Is Strategic Policy 10: Flooding sound?

a) Is the policy effective in terms of having regard to cumulative impacts?

- 2.7 No Comment.

b) Should it reference green and blue infrastructure?

- 2.8 No Comment.