



# Water Neutrality in Sussex North

**Webinar Q&A**

5<sup>th</sup> October 2023



## Thank you!

Thank you for attending our recent Water Neutrality webinar. Interacting with our customers is one of our top priorities, and we truly enjoyed seeing so many of you!

Please feel free to share some feedback and suggestions for future events so we can improve the experience for you. Any feedback/suggestions can be sent to our dedicated inbox: [waterneutrality@southernwater.co.uk](mailto:waterneutrality@southernwater.co.uk)

## Slide Pack

This pack is accompanied by a copy of the slides that were presented in the session on 5<sup>th</sup> October. Please do let us know if you have any further questions once you've had some time to absorb what was discussed.

## Recording

A recording of this webinar is now available on our website to view: [Water Neutrality \(southernwater.co.uk\)](https://www.southernwater.co.uk)



## Q&A:

### ***Is Natural England engaging with the RSPB at Pulborough or Amberley to conserve the snail? What has been done where the snail's habitat is?***

Natural England are and will continue to work closely with the RSPB regarding the Arun Valley designated sites, including impacts facing the little ram's-horn whirlpool snail (*Anisus vorticulus*).

Details of our assessment and issues that have been raised regarding the species will be shared with Southern Water once finalised. *(Response provided by Natural England)*

### ***What action has Southern Water taken to date? Do you plan to increase groundwater abstraction in the future?***

To mitigate the potential impact of abstraction from the Pulborough groundwater source, Southern Water has reduced abstraction by more than 50% from the source compared to the average abstraction in the first half of 2021–22. We are continuing to use alternative sources of supply and to maximise the bulk import from Portsmouth Water wherever possible. We are currently investigating the opportunity to formalise this operational regime outside of drought conditions (when we are more reliant on groundwater sources) and whether this could be an alternative solution to water neutrality.

Southern Water is currently in partnership with Natural England, the Environment Agency, Sussex Wildlife Trust, the RSPB and Atkins Ltd, to investigate the groundwater source further, through a Sustainability Study. The outcome of this Study will inform future decisions about the sustainability of groundwater abstraction at Pulborough and what level of groundwater abstraction may be possible.

### ***Does Southern Water have any plans to either increase or reduce groundwater extraction in Sussex North?***

Sussex North is supplied from a mix of water sources including the River Arun and the Western Rother, Weir Wood reservoir near East Grinstead and a transfer from Portsmouth Water. Approx 35% of water supply in Sussex North is normally provided by groundwater. Whilst a Sustainability Study is carried out (see above), Southern Water has voluntarily reduced our groundwater abstraction from Pulborough to an average of 5Ml/d, to mitigate the potential impact of abstraction at that locality. The outcome of the Sustainability Study will inform future decisions about the sustainability of groundwater abstraction at Pulborough and what level of groundwater abstraction may be possible.



***Does the Business Partnership Fund exclude the water neutrality area?***

[Business Partnership Fund \(southernwater.co.uk\)](https://southernwater.co.uk)

Applications from Sussex North will be reviewed on a case-by-case basis to comply with the water neutrality requirements in the region.

***Could you please clarify what types of projects the Business Partnership fund (Southern Water) is expected to fund? Will WN-related projects be in scope?***

The requirement from the Business Partnership Fund is that any successful projects funded in January 2024 must be complete, and a water saving be demonstrated by December 2024. If a project meets this requirement, then the application will be considered alongside all others by the Steering Group in January 2024. [Business Partnership Fund \(southernwater.co.uk\)](https://southernwater.co.uk)

## **Horsham District Council/SNOWS Q&A:**

***Can you clarify what type of planning proposals will be allowed to use SNOWS and what sort of impact SNOWS will make on the backlog and in what timescale?***

Any planning proposal will be able to request to use SNOWS, however the scheme is intended and will be designed to support planning applications that accord with local authority current and/or emerging development plans, meaning that speculative applications or those otherwise not in accordance with local authority plans will not be eligible to access SNOWS.

Whilst we intend to begin building up offsetting capacity within SNOWS prior to the formal launch of the scheme, we know that there will be insufficient capacity built up to meet anticipated demand at launch and for a period thereafter. Applicants should be mindful that there will not be guaranteed, immediate access to SNOWS during this time and we recommend they continue to explore other options to mitigate access risks if they are considering SNOWS as a potential water neutrality solution for their development.

It is too early in the development of the scheme to confirm the timescales for clearing any backlog, which will itself be fluid over the coming months.

***Will SNOWS also support allocations in Neighbourhood Plans? Existing allocations? Not just emerging allocations.***

In the current draft of the SNOWS application prioritisation process, Neighbourhood Plan allocations will neither be penalised nor explicitly prioritised but will be considered equally alongside other forms of development, so long as they are in compliance with the Neighbourhood and/or Local Plan.

***Should the water neutrality definition relate to that part of the source that there is insufficient evidence to demonstrate that there is no effect on the SAC?***

Through significant engagement between the local authorities, Southern Water, and Natural England after the NE position statement was issued to the affected authorities in September 2021, the Sussex North Water Resource Zone - as mapped on the West Sussex County Council website – has been agreed as the area to which water neutrality requirements apply.

**Southern Water comments:**

Southern Water is working in partnership with the Environment Agency, Natural England, the RSPB, Sussex Wildlife Trust, and Atkins plc to examine the hydro ecology of the Hardham Basin in detail. The timeline for this study is relatively long, because of the complex nature of the investigation. Currently there is detailed hydrometric and ecological monitoring underway, for which at least two years of study is needed; this will be continuing until spring 2024. The team will then move on to the impact assessment, in parallel with the development of a numerical groundwater model. The study is expected to reach its conclusion at the end of March 2025.

***Is there any guidance issued on this by the authorities or will there be an SPD? to guide on water neutrality statement content as well as process and stages for credit applications.***

When the SNOWS processes have been finalised, we will produce and issue guidance and will engage with the industry prior to scheme launch to outline the processes and respond to any questions. We will not be issuing guidance as a Supplementary Planning Document (SPD) as SNOWS does not sit directly within the remit of the LPAs and remains an optional offsetting solution for applicants. We will keep you updated on the scheme progress and any further scheme guidance through our regular communication channels, including our project newsletter and via regular Southern Water events.

***Can you point me at the evidence that water neutrality applies beyond groundwater abstraction please?***

The affected local authorities are responding to the issues raised by Natural England's position statement and subsequent correspondence, which can be found on the Horsham DC website here: <https://www.horsham.gov.uk/planning/water-neutrality-in-horsham-district/position-statement>.

We recommend that queries relating to evidence of harm are directed to Natural England in their capacity as the competent authority for the Arun Valley designated sites.

***Are boreholes a sensible solution for developments, and what would happen if they ran dry?***

It is not for us to say whether a borehole is a sensible solution for any particular site – it will depend on the site-specific conditions. However, some concerns have been raised about the overall increased proliferation of private boreholes in the Sussex North area because of water neutrality issues.

As part of any planning application, the developer must demonstrate with sufficient certainty that the borehole will not run dry for the period required by the Habitats Regulations, upon Natural England's advice. If a borehole were to run dry, the development would have to rely on mains supply and would therefore no longer be water neutral without additional offsetting. The quality of the abstracted water will need to be shown to be treatable to a potable standard. The FAQs on the Horsham website provide further information on what is required to support a borehole proposal.

***When will the offsetting scheme be in place? What volume of housing will this release annually and over what period?***

We aim to launch SNOWS in the first half of 2024, though with current resources it is likely to be towards the end of this period, i.e. summer 2024.

It is too early to say what volume of housing will be released annually. The aim of the scheme is to support the local authorities to achieve their local plan growth needs. These trajectories are still being developed by some of the authorities. Growth in early years of the local plans could be severely hampered by the capacity that SNOWS is able to generate.

SNOWS will operate – and water neutrality requirements will apply – until Southern Water have out in place sufficient measures to mitigate the impacts of their abstractions near Pulborough. It will however be planned until the end of the local plan periods in 2039/40 so that the local planning authorities can demonstrate that their local plans are water neutral.

***Will any guidance be issued on what should be expected in a water neutrality statement?***

Where there is specific information required to access SNOWS that needs to be included within a water neutrality statement or otherwise in the planning application, we will make this clear through any SNOWS guidance for applicants.

***If we apply for credits during planning stage, how can we then cover the credits certainty in our water neutrality statement which is a validation requirement?***

At this point in time, our expectation would be that the water neutrality statement identifies whether the applicant is seeking to use SNOWS, or a bespoke mitigation solution. The statement would need to identify the amount of water that needs to be offset. You would not need to have secured the credits to be able to submit a valid water neutrality statement with the submission of the application.

***What type of licence offsetting has been undertaken? Where are the successes?***

License trading is theoretically possible, but certainty is needed over actual abstraction volumes and the linkages to Hardham.

***How many credits will SNOWS generate, and over what timeframe?***

We don't have this information available yet. Ultimately it will depend on how many offsetting properties SNOWS can secure, how quickly, and then how quickly offsetting measures can be installed in those properties.

As noted above, SNOWS will operate – and water neutrality requirements will apply – until Southern Water have out in place sufficient measures to mitigate the impacts of their abstractions near Pulborough.

***Will offsetting credits from the scheme be available to all planning or just for those sites allocated in the emerging local plans?***

Any planning proposal will be able to request to use SNOWS, however the scheme is intended and will be designed to support planning applications that accord with local authority current and/or emerging development plans, meaning that speculative applications or those otherwise not in accordance with local authority plans will not be able to access SNOWS.

***We have clients redeveloping brownfield sites with an extant water use, but when we cannot get hold of existing water bills due to change of ownership, we must take a baseline of zero. Is there anything that Horsham can propose to avoid developers having to pay very high offsetting/credit fees?***

Unfortunately, not. There must be certainty of existing use and if that cannot be provided then a nil baseline must be taken.

***How will developers be able to access the SNOWS credit scheme and at what stage of the planning stage? Pre-app?***

The exact processes are currently under development. Our current thinking is that access to SNOWS will only be secured at the application stage, not at the pre-app stage, because capacity will be finite, sought after, and we are keen that any credits are used primarily for developments that will be delivered quickly – we want to avoid any credits being 'banked' by applicants.



### ***What will SNOWS credits cost?***

We do not have a cost at this stage. Credit costs are being worked up through development of the SNOWS Costs & Funding Plan, which is underway.

The best data available for costs are in the Water Neutrality Mitigation Strategy ('Part C') report, available here:

[https://www.horsham.gov.uk/data/assets/pdf\\_file/0004/120397/EYP-JBAU-XX-XX-RP-EN-0004-A1-C02-Water\\_Neutrality\\_Assessment\\_Part\\_C.pdf](https://www.horsham.gov.uk/data/assets/pdf_file/0004/120397/EYP-JBAU-XX-XX-RP-EN-0004-A1-C02-Water_Neutrality_Assessment_Part_C.pdf)

### ***It is good that SNOWS will be accessible to SMEs. Might this include standard rules approach to reduce detail required in an AA? e.g. a template AA?***

It is for the Local Planning Authority to complete the AA process, not applicants. There are many examples of water neutrality statements that can be found using the planning register and we have clear guidance on our online FAQs about what a statement needs to include.

### ***Can the SNOWS scheme be used to offset any scheme in SNWSZ?***

In theory, yes, subject to the scheme's access requirements. Offsetting measures provided anywhere within the Sussex North Water Resource Zone (WRZ) can be used to offset any development within the WRZ, excluding an area around Upper Beeding where offsetting measures cannot be installed but water neutrality requirements apply to new development.

## What's next?

The next webinar will be held in December 2023. At this session we are planning to showcase a range of third-party services and products that can be used to reduce water use. If your business would like the opportunity to present at the next webinar or you would like to provide some information to be included in a follow up pack, please get in touch: [waterneutrality@southernwater.co.uk](mailto:waterneutrality@southernwater.co.uk)

We will continue to provide monthly updates via our newsletter to keep you all informed.

**See you again soon!**

