



The countryside charity
Sussex

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Horsham District Local Plan 2023-40 Consultation (Regulation 19)

CPRE Sussex response to:

STRATEGIC POLICY 9: WATER NEUTRALITY

1. **CPRE Sussex asks that the following critical requirements**, stipulated by the 'Sussex North Water Neutrality Study: Part C – Mitigation Strategy Final Report November 2022', be included in Strategic Policy 9: Water Neutrality:

- 'Monitoring of the actual water use compared with the designed water use from new development will be required, and the amount of offsetting may need to be adapted accordingly through the Offsetting Scheme' (paragraph 87).
- 'Offsetting must be in place before the water demand is generated, for instance before new houses are occupied' (page viii).
- 'The application of offsetting measures should be demonstrated to be in place ahead of demand' (paragraph 30).
- 'Opportunities should be sought to combine any offsetting measures with education and information on the need to save water and how this can be done through changes in behaviour' (paragraph 175);

2. **Whether the water consumption target of 85 litres per day is viable and therefore achievable is uncertain, and therefore unproven.**

2.1 Uncertainty is apparent from the explanation of why the Horsham District Council Sussex North Offsetting Scheme (SNOWS) can't be launched sooner (Horsham District Council Sussex North Offsetting Scheme (SNOWS) FAQs – External September 2023):

- 'The launch of SNOWS involves a comprehensive and multi-faceted approach to ensure its effectiveness and success. While we are keen to expedite the launch, several factors contribute to the timeline and make an earlier launch challenging':
- 'To ensure the selected offsetting measures are practical and yield the desired outcomes, pilot projects and testing are likely to be necessary, in liaison with Natural England and other stakeholders. Conducting these pilots allows for adjustments and refinements before the offsetting measures can be rolled out more widely. Ultimately, our goal is to ensure that the scheme is well-prepared, aligned with environmental and regulatory requirements, and capable of making a meaningful and lasting impact on water conservation and sustainability in the Sussex North region'.

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President: Lord Egremont

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2.2 Uncertainty is indicated, too, by The Sustainability Appraisal Update Horsham District Local Plan, December 2023, where it advises at paragraph 6.4:

- 'The jointly prepared Water Neutrality Strategy (Sussex North Water Neutrality Study Part C, December 2022) identifies that the level of water available from offsetting schemes to help deliver new growth in the plan period to 2040 is currently limited, particularly in the early stages of the plan period.
- 'at the time of this assessment, no developer-led water neutrality schemes have been identified of sufficient certainty or scale to accord with Habitat Regulations 2017 as applies to local plans. Growth is therefore restricted to what Southern Water's Water Resources Management Plan (WRMP) and the local authorities' offsetting scheme can in combination support'.

2.3 In addition, the 'Sussex North Water Neutrality Study: Part C – Mitigation Strategy Final Report November 2022' states that

'Setting a tighter standard for water efficiency does not guarantee that the eventual water-use in a development will be as expected, or that it will stay at the designed figure' (paragraph 101).

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