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Examination in Public: Horsham District Local Plan 2023 - 2040

### **Matter 3 – Climate Change and Water Neutrality**

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

### **The following amends my submission for CPRE Sussex Strategic Policy 9 Water Neutrality 1190653**

1 Achieving water neutrality is an essential prerequisite for the achievement of sustainable development in Horsham District - justified and consistent with national policy: NPPF paragraphs 7, 20 b), 153, 179 b) and 181, and consistent too with Transforming our World: the 2030 Agenda for Sustainable Development (NPPF paragraph 7 refers): Goals 6 and 15:

Goal 6. Ensure availability and sustainable management of water and sanitation for all.

Goal 15. Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss.

2. 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

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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).

3. The Sustainability Appraisal Update Horsham District Local Plan, December 2023, advises at paragraph 6.41 that: “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.

3.1 And that: “at the time of this assessment, no developer-led water neutrality schemes have been identified of sufficient certainty or scale to accord with the 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”.

3.2 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).

4. The Sussex North Offsetting Water Scheme (SNOWS) is work in progress.

4.1 Progress to October 2024 is reported in ‘The SNOWS Newsletter: Updates from the Sussex North Offsetting Water Scheme (SNOWS) for October 2024’.

4.2 We note the SNOWS Project Manager’s advice that over the autumn he will be “reviewing and responding to Southern Water’s Water Resources Management Plan (WRMP) consultation. The outcomes of this consultation and plan are critical, as they will have direct implications for SNOWS. We’re prepared to adjust our project plans accordingly to ensure alignment with the latest water resource strategy and to maintain the integrity of the scheme”.

Dr R F Smith

Trustee CPRE Sussex

For and on behalf of CPRE Sussex

22 November 2024