



Horsham  
District  
Council

## Horsham District Local Plan Examination

# Response to Action Point 10

**Matter 1, Issue 2 - Legal and Procedural Requirements - Whether the Council has complied with other relevant procedural and legal requirements?**

**Matter 3, Issue 2 - Climate Change and Water- Whether the approach to water neutrality and flooding is justified, effective, consistent with national policy and positively prepared?**

## HDC34

December 2024

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# Action Point 10: Provide evidence of meeting notes with bodies to facilitate SNOWS coming forward, i.e. Executive Boards demonstrating decision making around resourcing.

## Background

1. Even before the Natural England Water Neutrality Position Statement (**CC08**) was issued in September 2021, water resource issues were having significant resource implications for Horsham District Council (HDC) because the consultancy JBA had already been instructed to begin producing evidence base work on behalf of HDC and other Sussex North authorities prior to that date. However, these resourcing implications were further exacerbated following the issue of the position statement.
2. HDC has had to spend significant funds on working to resolve water neutrality issues, including recruitment, legal and consultancy costs. HDC has also lost funding that would otherwise be received if not for water neutrality, for example through lower receipts from planning fees due to depressed housing delivery for the last 3 years.
3. HDC has also faced staffing resourcing issues because of water neutrality. Producing the joint water neutrality policy and evidence base has placed additional burdens on the Strategic Planning team, and responding to water neutrality issues through planning applications has burdened the Development Management team. It has also impacted the resourcing of other HDC specialist teams, including Legal and Environmental Health Teams. Finally, HDC has had to jointly employ two full-time officers to develop and implement the local authority-led offsetting scheme, SNOWS.
4. Lobbying for and securing additional resources – funding, staffing and specialist resources – has been a high priority for HDC and the other Sussex North authorities. The issue of resourcing has been widely discussed amongst the Sussex North authorities, central government, and other project partners and external bodies. We provide detail of this engagement in this note and examples of such engagement in the appendices.
5. Following an initial review of our meeting notes and communications related to project resourcing, we have identified wide-ranging engagement on this matter, as set out in the rest of this note. We have broken down the engagement into '2022', prior to the employment of full-time project resource, and '2023 and 2034' following the employment of the Water Neutrality Project Manager in January 2023.

## Project resourcing engagement – 2022

### Water neutrality governance meetings

6. Resourcing was discussed at all the **Water Neutrality Executive Board** meetings in 2022, which were held on the dates below. We have also included details from the relevant sections of some of the meetings in **Appendix A**. These meetings were usually attended from central government by MHCLG (was DLUHC) and Defra; government agencies Natural England, the Environment Agency and Ofwat; as well as Southern Water.
  - 18 February 2022 (see **Appendix A**)
  - 25 April 2022
  - 22 June 2022
  - 22 July 2022
  - 27 October 2022 (see **Appendix A**)



- 8 December 2022
7. Resourcing was also discussed routinely at the **Water Neutrality Lead Officer Group** meetings in 2022, specifically at the meetings held on the dates below. We have also included details from the relevant sections of one of the meetings in **Appendix A**. These meetings were usually attended from government agencies Natural England and the Environment Agency.
- 13 April 2022
  - 11 May 2022
  - 8 June 2022
  - 14 September 2022
  - 12 October 2022 (see **Appendix A**)
  - 9 November 2022
  - 5 December 2022

### [Ministerial communications](#)

8. During 2022, we wrote to the following Defra and MHCLG (DLUHC) ministers, which included requests for additional resources and/or support from central government. Details of these communications are provided below and copies of the letters in **Appendices B & C**.
- **19 August 2022:** Letter to Greg Clark, MP – Secretary of State for Levelling Up, Housing and Communities (MHCLG, was DLUHC) (see **Appendix B**)
  - **14 November 2022:** Letter to Trudy Harrison, MP – Minister for Resources and Waste (Defra) (see **Appendix C**)
  - **30 November 2022:** Letter to Lucy Frazer, MP – Minister of State for Housing and Planning (MHCLG, was DLUHC). Note this was a very similar letter to that sent to Trudy Harrison, MP.
9. No responses were received for these communications, despite requests to representatives from Defra and MHCLG (was DLUHC) at every Water Neutrality Executive Board meeting following the issue of the letters. Such requests can be seen in the meeting notes for the Executive Board meetings provided for 17 April 2023 and 11 September 2023 in **Appendix A**.

### [Funding bids](#)

10. In February 2022, we submitted (via West Sussex County Council), a bid for £100,000 of seed funding to support the development of a water neutrality project team (see **Figure 1** overleaf) from the Coast to Capital Local Enterprise Partnership (LEP). This bid was successful and approved in March 2022. Primarily, this funding was used to recruit and pay for the Water Neutrality Project Manager.

4.2. Description of business case development activities and cost Please add additional lines where necessary	Cost (£) (Excluding VAT)	How has the cost been calculated? (Quote or estimate)
<b>Water Neutrality Lead Officer Working Group</b> to assemble Project Management Office (Senior Project Manager, Project Support Officer, Partnership Manager)	£105,227	Quote (using corporate pay rates for similar officer grades)
<b>Project Management Office</b> to take ownership of Water Neutrality project plan, associated workstreams and stakeholder management (including series of workshops and board meetings)	£15,000	Estimate
<b>Project Management Office</b> to procure Specialist Legal support	£45,000	Estimate

<b>Project Management Office</b> to procure Specialist Technical Support (Water Management)	£25,000	Estimate
<b>Project Management Office</b> to procure Specialist Technical Support (ICT / Data Management)	£25,000	Estimate
<b>Project Management Office</b> to procure Specialist Technical Support (Skills)	£20,000	Estimate
<b>Water Neutrality Lead Officer Working Group</b> to review Water Neutrality Strategy, associated advice notes and draft Full Business Case for a coordinated response to Water Neutrality	0	
<b>Water Neutrality Executive Board</b> to consider Strategy and Full Business Case for a coordinated response to Water Neutrality	0	

Figure 1: Coast to Capital LEP bid details for the Sussex North authorities (Feb 2022)

## Project resourcing engagement – 2023 and 2024

### Water neutrality governance meetings

11. Resourcing was discussed at all the **Water Neutrality Executive Board** meetings in 2023 and 2024 as a standing agenda item, which were on the dates below. We have also included details from the relevant sections of some of the meetings in Appendix A. These meetings are usually attended from central government by MHCLG (was DLUHC during 2023 and some of 2024) and Defra; government agencies Natural England, the Environment Agency and Ofwat; as well as Southern Water.

- 20 February 2023
- 17 April 2023 (see **Appendix A**)
- 19 June 2023
- 11 September 2023 (see **Appendix A**)
- 16 October 2023
- 11 December 2023

- 26 February 2024 (see **Appendix A**)
  - 22 April 2024
  - 22 July 2024
  - 23 September 2024 (see **Appendix A**)
  - 25 November 2024
12. Resourcing was also discussed occasionally at the **Water Neutrality Lead Officer Group** meetings in 2023 and 2024, which were on the dates below. We have also included details from the relevant sections of one of the meetings in Appendix A. These meetings are usually attended from government agencies Natural England and the Environment Agency.
- 8 February 2023
  - 2 August 2023 (see **Appendix A**)
  - 5 June 2024

#### [Government meetings and communications](#)

13. During 2023 and 2024, we have directly engaged with central government on the matter of resourcing water neutrality and SNOWS at least on the occasions detailed below. Copies of most of the e-mails and/or meeting discussions are in **Appendices D - F**.
- **6 February 2023:** Meeting between HDC & Crawley Borough Council (CBC) Directors and Homes England to discuss capacity support for water neutrality issues.
  - **28 April 2023:** E-mail from Clark Gordon (SNOWS) to MHCLG (was DLUHC) following Water Neutrality Executive Board meeting on 17 April 2023, requesting various resource support (see **Appendix D**).
  - **31 July 2023:** Meeting involving SNOWS, HDC & CBC with Defra to discuss Cambridge water scarcity issues and further Defra support that could be provided to the Sussex North authorities (see **Appendix E**).
  - **1 November 2023:** E-mail from Clark Gordon to Defra (cc'd MHCLG, was DLUHC) providing details of funding bids made in advance of the Autumn Budget – this was requested by Defra at the Water Neutrality Executive Board meeting on 17 October 2023 (see **Appendix F**).

#### [Meetings with other external bodies](#)

14. Clark Gordon (Water Neutrality Project Manager, SNOWS) met with Southern Water (SW) on **6 March 2023** for an introductory meeting. The agenda items included how SW would input to the SNOWS scheme, and understanding what resource support SW could offer to SNOWS. Relevant sections of the meeting notes are provided in **Appendix G**.
15. Clark Gordon has also represented the Sussex North authorities (including HDC) on a working group / forum set up by the Future Homes Hub explicitly to discuss water neutrality issues for the homebuilding industry. The forum includes representatives from the homebuilding industry – including the Home Builders Federation, central government, water companies, and water efficiency measures suppliers. The forum aims to provide advice to government and guidance for the development industry. At each meeting set out below, Clark Gordon has highlighted the resource needs for the Sussex North authorities and SNOWS. Relevant outputs for two of the meetings have been provided in **Appendices H & I**.

- 28 March 2023 (see **Appendix H**)
  - 14 November 2023 (see **Appendix I**)
  - 31 January 2024
  - 14 March 2024
  - 22 May 2024
  - 14 November 2024
16. On 20 July 2023, Clark Gordon (SNOWS) and a representative from West Sussex County Council met with the Planning Advisory Service (PAS) to discuss the resourcing issues for water neutrality in Sussex North and to identify how PAS may be able to support. Relevant sections of Clark Gordon's meeting notes have been provided in **Appendix J**.

### [Ministerial meeting and communications](#)

17. Below is a timeline of our communications and meetings with central government ministers during 2023 and 2024 on the matter of water neutrality. Our communications make clear that resourcing is a significant barrier to us progressing more quickly with the development of SNOWS. We have included a selection of our letters to and from ministers in **Appendices K – O**.
- **21 September 2023:** Letter to Rebecca Pow, MP - Minister for Environmental Quality and Resilience (Defra) (see **Appendix K**)
  - **29 November 2023:** Response from Robbie Moore, MP - Minister for Water and Rural Growth (Defra) (see **Appendix L**)
  - **21 May 2024:** Sussex North authority (including HDC) Chief Executives and Leaders meeting with Robbie Moore, MP - Minister for Water and Rural Growth (Defra)
  - **17 June 2024:** Letter to Robbie Moore, MP - Minister for Water and Rural Growth (Defra) following May meeting (see **Appendix M**)
  - **26 September 2024:** Letter to Emma Hardy, MP - Minister for Water and Flooding (Defra) (see **Appendix N**)
  - **26 September 2024:** Letter to Matthew Pennycook, MP - Minister of State for Housing and Planning (MHCLG). Note this was a very similar letter to that sent to Emma Hardy, MP.
  - **12 November 2024:** Letter from Emma Hardy, MP - Minister for Water and Flooding (Defra) (see **Appendix O**)
18. Further to the above, we have also arranged a Sussex North (including HDC) Chief Executives and Leaders meeting on **14 January 2025** with Emma Hardy, MP - Minister for Water and Flooding (Defra), at which we intend to raise the issue of resourcing for water neutrality and SNOWS.

### [Funding bids](#)

19. Through 2023 and 2024, we have made several bids for government funding to support the ongoing development and implementation of the SNOWS scheme, details of which are provided below. Two of our bids in 2023 were unsuccessful, whilst we were successful with our bid for £250,000 from MHCLG's Planning Skills Delivery Fund in late 2023. We await the outcome of our 2024 bid to MHCLG's New Homes Accelerator programme, which offers non-financial resources to support the delivery of new housing.

- **April 2023:** Ofwat Water Discovery Challenge bid (£50,000) - unsuccessful.
- **May 2023:** MHCLG Local Nutrient Mitigation Fund bid (£100,000) - unsuccessful.
- **September 2023:** MHCLG Planning Skills Delivery Fund bid (£250,000) – successful. Funds were received by HDC in February 2024.
- **November 2024:** MHCLG New Homes Accelerator (non-financial project support) – awaiting outcome.

#### [Recruitment of full-time water neutrality / SNOWS staff](#)

20. In January 2023, using funds secured through the Coast to Capital LEP (see paragraph 10), HDC (on behalf of the Sussex North authorities) employed a Water Neutrality Project Manager to lead the design, implementation and operation of the local authority-led water offsetting scheme, subsequently to be known as SNOWS.
21. In September 2024, using funds secured through MHCLG's Planning Skills Delivery Fund, HDC (on behalf of the Sussex North authorities) employed a Water Neutrality Officer to support the ongoing implementation of SNOWS, and specifically to lead on the development of SNOWS' own water offsetting programme to provide 'water credits' for the scheme to enable development to progress.

#### [SNOWS Risks, Issues & Opportunities Register](#)

22. A copy of the SNOWS Risks, Issues & Opportunities (RIO) Register is to be published in the Examination Library. Several risks, issues and opportunities have been identified related to local authority and SNOWS resourcing, which are outlined below.
23. The following resourcing risks have been identified in the RIO Register:
  - **Risk 002** - Forward funding
  - **Risk 003** - Loss of local authority funds
  - **Risk 021** – Local authority capacity
  - **Risk 027** - Registered Providers are not willing to offer sufficient stock to SNOWS
  - **Risk 039** - Project production delays pushing back target scheme launch date
  - **Risk 047** - Delays to SNOWS procurement activities
24. The following resourcing issues have been identified in the RIO Register:
  - **Issue 001 (closed)** - Insufficient legal capacity. This issue was closed following receipt of MHCLG Planning Skills Delivery Fund payment and procurement of external legal support services.
  - **Issue 003** - Delays with Southern Water's WRMP24 data
  - **Issue 004** - Securing offsetting properties for SNOWS
25. The following resourcing opportunities have been identified in the RIO Register:
  - **Opportunity 007** – Links with academic institutions to support with scheme monitoring
  - **Opportunity 008** - SNOWS to undertake reviews of Water Neutrality Statements instead of local planning authority development management teams



# Appendix A – Record of water neutrality governance meeting notes discussing water neutrality and SNOWS resourcing

## Friday 18 February 2022 - Water Neutrality Executive Board meeting

Attended by representatives from: Crawley BC, Chichester DC, Horsham DC, South Downs National Park, West Sussex CC, Natural England, Environment Agency, Defra, MHCLG (was DLUHC)

Agenda item 5) – Support / Resourcing / Bid for LEP Funding:

### **Support**

*LPAs outlined some of the key issues they are facing on the ground – the economy is suffering significant adverse effects.*

*HDC highlighted that with 99% of HDC covered by the WN Position statement, housing development is at a standstill. This will impact the 5-year supply and the ability to deliver plan led development once the solution is found. Short, medium and long term solutions are needed. Support from DLUHC / DEFRA is required to ensure development can continue to be plan led – it will be difficult to get political buy-in to agree plans without it. Similar issues raised by CBC and CDC – who are also affected by Nutrient Neutrality which impacts housing delivery. WSCC also highlighted the significant impacts this has on infrastructure delivery including schools.*

*DLUHC: not naïve to problems being faced – are seeking to listen and understand issues. Whilst not able to provide solutions at this stage this issue is being considered as part of the programme of planning reform.*

*DLUHC: recognise the need for short term solutions - DLUHC considering their own solution or potentially PAS support to help provide collective support for mitigation.*

*CBC – Outlined that a joint letter from the leaders of all affected authorities had been sent to Michael Gove requesting assistance. It is hoped that a response will provide clarity on this matter.*

*DLUHC - are seeking to engage and smooth the process as much as possible and aim to deal with the issue at a strategic level rather than burden on individual developments in the longer term.*

*DEFRA– it is clear some issues are for gov't to take away and resolve including work with Southern Water on short and longer term solutions.*

### **Resourcing / LEP bid**

*Opportunities for funding streams from SW being followed up*

*WSCC – submitted bid for funding for £100k to the LEP to provide more resource for a project manager to bring together work streams, admin support and an offsetting technical specialist to help identify potential offsetting projects. Funding is around ½ of 3 posts. More will be needed longer term to deliver detailed offsetting projects.*

*The bid sets out current impacts*

- *2,300 planning applications on hold*
- *10,000m<sup>2</sup> of commercial space cannot progress – including a supermarket*
- *22,000 homes identified in Local Plans unable to proceed.*

## Wednesday 12 October 2022 – Water Neutrality Lead Officer Group (WNLOG) meeting

Agenda item 5) – Offsetting Implementation Scheme:

Need a post to develop/deliver the offsetting scheme. Chief execs have agreed that a permanent post is required, and job spec is being updated. HDC has spoken with Public Practice, and they can support. But we should go out as a group of authorities.

Now Part C is almost finalised, an initial grouping list of next stages is needed. The Implementation Group is referred to in the Governance structure but now needs to be started in earnest. SL: Needs DM and housing team input, and policy input at the beginning (until overall project lead is appointed). **Action: need to know who at each LA should be included. Each LA to nominate an officer from each of DM, Policy, Housing. Then need a date set up for initial meeting by end October.**

Noted that [Crawley Homes] input will be important, at least initially, as [they] have been central to CBC pilot. Important to stress that [Crawley Homes lead] has many competing priorities. Project manager will eventually need able to take this on.

WSCC: Will need more than just a project manager, also officers, technical specialist support. Need to get on and spend the LEP funding.

HDC: Job Description is worded to allow Project Manager to recruit – would delay further to advertise for other posts. Quicker to get first person appointed.

CBC – we are already rolling out offsetting without internal specialist input. Project manager could take this on and procure skills as and when needed. Worth asking if there is a secondment opportunity from NE? Could pay for that through LEP funding. **Action: add secondment question to CEx meeting.**

i. Natural England offer of support

[NE rep] is NE's newly appointed national lead for water neutrality. NE keen to support the Local Authorities:

- Had discussed possible NE funding towards water neutrality project officer post: [NE rep] asked, but request denied as not appropriate for NE to fund, and funds are Capital rather than Revenue.
- Possible NE interest-free loan to assist with offsetting scheme set up: no update as yet. CDC noted that there may be legal issues, as can't borrow against improvements we don't own/control. CBC would though control the offsetting asset, so may be different.
- NE evidence base: diffuse pollution plan, peat and hydrology reports, update on Pulborough surveys. These would be very useful for our HRA consultants. **Action: NE to advise when these studies can be published. Would ideally have sight of these as soon as possible given HDC Local Plan deadline of 7 December.**
- NE input support on Statement of Common Ground would be much welcomed.

It was noted that NE is overseeing national approach to Nutrient Neutrality credits. Is there scope for a similar approach in relation to water neutrality?

### **Thursday 27 October 2022 - Water Neutrality Executive Board meeting**

Attended by representatives from: Crawley BC, Chichester DC, Horsham DC, Mid Sussex DC, South Downs National Park, West Sussex CC, Natural England, Defra, MHCLG (was DLUHC), Southern Water

Agenda item 9) - Offsetting Implementation Scheme / Support / Resourcing:

HDC: Policy officer group have been asked to nominate officers onto this group, HDC being sent names. Project Manager post now live on HDC website until 16<sup>th</sup> November. That post will run the offsetting group among other tasks. Advertised as a full-time and higher-grade post than previously advertised. HDC hosting but a resource for everyone involved.

**ACTION** - advert to be shared with all the partners on the meeting so it can be shared widely.

CBC: NE running the NN offsetting. Any thoughts on running WN offsetting?

NE: NE been asked to run the biodiversity aspects of the NN solutions. Forward funding and rolling investment programme is the key challenge on such schemes. Cost of implementation being clear would be recommended to help an offsetting programme.

CBC: [We] will keep asking regarding forward funding and support for offsetting. Key challenge is early option of any schemes and funding. NE suggested DEFRA might offer interest free loans but not heard any more, would appreciate if this could be investigated further.

**ACTION** – DEFRA to consider and report back...

### **Monday 17 April 2023 - Water Neutrality Executive Board meeting**

Attended by representatives from: Crawley BC, Chichester DC, Horsham DC, South Downs National Park, West Sussex CC, SNOWS, Natural England, Environment Agency, MHCLG (was DLUHC), Ofwat, Southern Water

Agenda item 2) v) – Outstanding actions (ministerial responses to letters):

DLUHC are meeting with the EA and NE to discuss roles & responsibilities in relation to water neutrality issues.

Minister Maclean (Minister of State - Housing and Planning) will be responding to the letter from the local authorities in due course. There has been news on the nutrient neutrality front.

CBC: We still feel left behind compared to nutrient neutrality. We've waited a long time for a ministerial response and it's costing the local authorities a lot of money & resources. The delays are disappointing.

DLUHC: We understand your frustrations; we are trying. We will be taking advice to the Minister.

DLUHC: The opportunity to bid for nitrate neutrality projects is now open. It will be looked at for water neutrality projects as well. Recommend that local authorities review and consider this funding opportunity.

CBC: Any support DLUHC can provide would be appreciated.

**ACTION:** CG to review nitrate funding opportunities and submit bid on behalf of the local authorities and the offsetting scheme

**ACTION:** DLUHC to send Minister Maclean response once finalised

**ACTION:** Defra to provide an update on their ministerial response

### **Wednesday 2 August 2023 – Water Neutrality Lead Officer Group (WNLOG) meeting**

Attended by representatives from: Crawley BC, Chichester DC, Horsham DC, South Downs National Park, West Sussex CC, SNOWS, Natural England, Environment Agency

Agenda item 7) i) – Engagement over last month:

#### **Meeting with Defra to discuss Cambridge water offsetting funding**

£3m has been obtained for Cambridgeshire region to help resolve their water neutrality issues, as well as support for workshops and working groups, but nothing has been provided to our area. Defra advised a “top down”, politically-led approach was being taken in Cambridgeshire whilst considering Sussex North was a more bottom-up approach. Frequent changes of Minister was given as the reason why our requests for funding for SNOWS had not been answered. Defra committed to discussing the situation with colleagues at Defra and DLUHC. DLUHC may be considering review of the 110lppd standard.



Agenda item 7) ii) – Engagement this month:

**Ofwat Water Efficiency Fund consultation**

£100m fund "to stimulate a measurable reduction in water demand across England and Wales, for both residential and business customers". CG planning to respond by 22 September to see whether funding can be obtained for SNOWS.

Agenda item 7) x) – Any other major progress updates:

*Funding: Still awaiting response from DLUHC on **Nutrient Neutrality Mitigation Fund** bid Awaiting decision. Understand that it is Likely to be determined at end of August.*

*Funding: DLUHC **Planning Skills Delivery Fund** (PSDF) – closes 11 Sep*

*Two different paths – one for DM and another for wider planning function. May explore pursuing idea that attracting funding for WN would help deal with backlog of applications caused by situation. Potential to attract £100k per authority.*

**Action:** Clark Gordon to review bid options and liaise with WNLOG on bid response

**Monday 11 September 2023 - Water Neutrality Executive Board meeting**

Attended by representatives from: Crawley BC, Chichester DC, Horsham DC, South Downs National Park, West Sussex CC, SNOWS, Natural England, Environment Agency, Defra, MHCLG (was DLUHC), Ofwat, Southern Water

Agenda item 8 – Resources:

**i) Ministerial Letters**

*CBC: Covered earlier in meeting. For awareness - there is a plan from the Council Leaders to write another letter to Minister Pow - lack of response to previous letter & Cambridge issues are highlighted. Civil servants will likely be in election mode soon, so it would be good to get things moving sooner rather than later.*

*SDNPA: Lack of proactivity is the most disappointing thing given the issues and seniority of this board. We should have been told about the Cambridge announcement rather than it coming out of the blue for us.*

**ii) Project resourcing**

*We anticipate a mid-2024 launch with current resources. NN funding bids - no news despite chases to DLUHC for updates last week. Legal support is critical and the project's highest priority to fund.*

**iii) DLUHC Planning Skills Delivery Fund**

*Bid drafted late due to expectation of hearing about NN funding by end of Aug. Submitted on 11 September. **Post-meeting note:** Clark Gordon sent e-mail to DLUHC to advise of PSDF bid submitted after Exec Board meeting. DLUHC acknowledged and will provide an update on our two funding submissions to date.*

**Monday 26 February 2024 - Water Neutrality Executive Board meeting**

Attended by representatives from: Crawley BC, Chichester DC, Horsham DC, Mid Sussex DC, South Downs National Park, West Sussex CC, SNOWS, Natural England, Environment Agency, Defra, MHCLG (was DLUHC), Ofwat, Southern Water

Agenda item 7 – Planning Skills Delivery Fund:

*In September 2023, we submitted a bid for funding to DLUHC's Planning Skills Delivery Fund, a £29m fund intended to provide support to local authorities to help clear backlogs of planning applications and address*

skills gaps. We submitted a joint bid for £250,000 for the 'skills gap' funding stream. The successful local authorities were due to have been advised by October, but this was subsequently delayed until mid-December. We received notification that we were successful with our bid, receiving the full amount that we asked for.

Following this notification, we received the Memorandum of Understanding (MoU) from DLUHC earlier in February. This was returned by HDC's S151 Officer on 6 February and we received the Grant Determination Letter on 9 February. We expect the funds to be received by HDC imminently. We set out how we would spend the £250,000 in our bid submission to DLUHC. We anticipated that we would spend around £180,000 over the next year for the continued employment of CG (Water Neutrality Project Manager), plus recruitment of a Project Support Officer and an Offsetting Delivery Manager (to lead on securing offsetting properties and suppliers into the scheme). Once SNOWS is launched, these staffing costs will be incorporated into the SNOWS operating costs and therefore these roles will be funded by developer contributions. A further £60,000 was allocated for the provision of legal services, which remains a high priority for the project. The remaining £10,000 would be allocated to consultancy support for other project issues, such as the development of the Monitoring & Reporting Plan, the Costs & Funding Plan, or the Delivery Plan.

The MoU and Grant Determination Letter from DLUHC specify that we must have "committed" to spend the funds by the end of March 2024. The guidance on exactly what is meant by "committed" is lacking. However, CG joined a Planning Advisory Service (PAS) workshop that provided further advice on this matter. It is clear that we, and the other authorities that received funding, are not in a position to have spent our funds in the few weeks remaining until the end of March. The advice from PAS was that as long as there is a clear plan by the end of March about how the funds will be spent, then funds can be spent in the 2024/25 financial year. We believe we are in a good position on this with the project plan documentation that we have already produced for the development of the SNOWS scheme. The funds are already allocated in HDC's budget for the next financial year. Regardless of when and how the funds are spent, we will need to report back to DLUHC quarterly with details of funding spend and project outcomes. CG will attend a further PAS workshop in March to discuss progress on funding allocation spend and outcomes.

CG has already submitted a draft Procurement Plan to the shared procurement service and highlighted that procurement of legal services is a high priority. We anticipate procuring legal services before the wider Procurement Plan is finalised. We are also commencing work on recruitment of an Offsetting Delivery Manager. The recruitment of a Project Support Officer is being assessed further, as it may be preferable for this post to be a shared resource with the HDC Strategic Planning team, rather than a full-time resource for SNOWS.

Agenda item 9 – Resources:

**i. Feedback from Officer Meeting with DEFRA/DLUHC (CG)**

CG noted that several members of WNLOG, representing all of the sponsoring authorities, plus reps from the EA and NE, met with staff from Defra and DLUHC in late January.

The objectives of the meeting were:

- To provide a summary and progress update on the development of the SNOWS offsetting scheme and our planning policy approach
- To understand the water scarcity work being undertaken by central government and how this will support the Sussex North authorities
- To outline the key challenges and issues for all water neutrality work in Sussex North and understand how central government may be able to help address these challenges
- To discuss the specific support that central government may be able to provide to Sussex North going forward
- To understand how we may be able to work jointly with and support the water scarcity issues and ongoing work in Cambridge / East Anglia

*The meeting was a useful opportunity for us to outline the key challenges in Sussex North to Defra's new Water Scarcity and Development team... We also outlined the key areas where we need greater support from government and other stakeholders, such as Southern Water...*

**ii. Feedback from Defra Minister Meeting with Sussex North Leaders**

*HDC: Meeting was cancelled [by the minister]. CBC has prepared a letter for Defra asking for a reschedule.*

*Defra: The meeting is being rescheduled behind the scenes.*

**Monday 23 September 2024 - Water Neutrality Executive Board meeting**

Attended by representatives from: Adur & Worthing Councils, Crawley BC, Chichester DC, Horsham DC, Mid Sussex DC, South Downs National Park, West Sussex CC, SNOWS, Natural England, Environment Agency, Defra, Ofwat, Southern Water

Agenda item 7) – Update from SNOWS

*Clark Gordon has appointed Freeths through procurement process with the approval of legal services and comments are expected this week...*

*[redacted] introduced as new Water Neutrality Officer – she will work with Clark to find sites to build up bank of offsetting sites.*

Agenda item 8) – AOB

*MHCLG has recently launched a 'New Homes Accelerator' programme, HDC asked whether we should be putting in a bid. Defra offered advice that anything that raises the profile should be done and agreed it would be beneficial to put in a bid.*

**ACTION:** *Clark Gordon to review New Homes Accelerator programme and submit bid on behalf of the Sussex North authorities*

## Appendix B – Letter to Greg Clark, MP – Secretary of State for Levelling Up, Housing and Communities (MHCLG, was DLUHC) – August 2022

Greg Clark, MP  
Secretary of State for Levelling Up,  
Housing and Communities  
House of Commons  
London, SW1A 0AA

Our ref: BC/JC/SLA  
Your ref:

Date 19th August 2022

Dear Mr Clark,

Water Neutrality

I am writing to you as a follow up to earlier correspondence with your predecessor. Horsham District Council is seeking to establish a mitigation strategy to deal with the pressing issue of “water neutrality”. “Water neutrality” has an identical impact on development as “nutrient neutrality” with which you will be familiar, we are seeking to be treated in the same way as Councils impacted by the latter. This will help us develop with Natural England and other stakeholders a mitigation strategy which may well be of wider value as this issue becomes more prevalent and impacts more local authorities.

Increasing rates of water abstraction from a local aquifer has been linked with serious adverse impacts on internationally protected wetland sites located in the Horsham District as a result of which some species are facing extinction. In September 2021 Natural England wrote to my Council (and four other affected authorities). This letter states that no further growth or development can take place unless it can be demonstrated to be water neutral (in other words, that it does not increase rates of water abstraction above existing levels). Our area is, to date the only one affected by this issue and my authority the only Council in the country that is wholly impacted.

The impact of this Position Statement has been very significant: notwithstanding the receipt of some 2,400 planning applications in the affected area, permission has been able to be granted by Horsham District Council for just 24 homes.

Work has been undertaken since September seeking to deliver a solution to Water Neutrality including the appointment of consultants. I am grateful for the input of DLUHC staff in providing some guidance and advice to my officers on the next steps. It is however increasingly clear that the matter is highly complex and will require detailed joint working between Local Authorities, the water industry, and the development industry to finalise and implement a solution.

Nutrient neutrality considers water quality as opposed to water quantity but otherwise the impact is the same, in that it also prevents new development unless mitigation measures are put in place. We are aware that each area subject to nutrient neutrality is receiving £100,000 in Government funding to assist them in finding solutions. My authority has not received such funding because it is not, at present affected by the issue of nutrient neutrality.

As a relatively new issue, water neutrality is not specifically identified in the funding stream. However, given that nutrient neutrality and water neutrality have in essence an identical social and economic impacts, it appears there may have been an oversight in not making funding available for tackling the issues of Water Neutrality.

We would be most grateful to be simply put on the same financial footing as councils effected by a similar issue in seeking to find solutions that balance the very critical environmental concerns with proportionate development to reflect the needs of our District.

By ensuring the north-west Sussex area is provided with adequate financial support to deliver a solution, the work undertaken here will ultimately act as a template as the issue of water neutrality becomes more prevalent.

I would be most grateful for your urgent attention on this issue. The amount of support we are seeking is significant for the Council, but we suspect, a critical national investment in seeking to find an appropriate and proportionate mitigation strategy on this critical (and no doubt growing) environmental issue. We are only requesting support which mirrors that given to other areas that are tackling a similar issue in the form of "nutrient neutrality".

Yours sincerely,

A handwritten signature in black ink, appearing to read 'J. L. Chowen'.

Jonathan Chowen  
Leader & Cabinet Member for the Local Economy  
Horsham District Council

## Appendix C – Letter to Trudy Harrison, MP – Minister for Resources and Waste (Defra) – November 2022

14<sup>th</sup> November 2022

Trudy Harrison MP  
Minister for Resources and Waste  
DEFRA  
2 Marsham Street  
London  
SW1P 4DF  
[trudy.harrison.mp@parliament.uk](mailto:trudy.harrison.mp@parliament.uk)

Dear Minister Harrison

### **Water Neutrality: Sussex North Water Resource Zone**

Congratulations on your appointment as the Minister for Waste and Resources, with responsibilities including the brief for Water.

We are writing on behalf of local authorities in the Southern Water - Sussex North Water Resource Zone area; Horsham District Council, Crawley Borough Council, Chichester District Council, Mid Sussex District Council, the South Downs National Park Authority and West Sussex County Council.

Hopefully you will already be aware that these local planning authorities are currently subject to water neutrality restrictions which have meant that local authorities in the Sussex North area are unable to permit planning applications apart from minor development unless water neutrality can be demonstrated. Water Neutrality has come into effect because Natural England has identified a serious impact on an important natural habitat caused by water abstraction in the Arun Valley area and has issued a Position Statement preventing new development unless it can be proven not to make this situation any worse, by being water neutral. We are the only local authority areas in the UK that have been designated as such.

This is having serious consequences for the delivery of new homes and economic growth and has also significantly delayed the progression of statutory Local Plans. However, the affected local planning authorities have been working effectively together with consultants, JBA Consulting, on a Sussex North Water Neutrality Strategy to allow the progression of the Local Plans. Natural England, Southern Water and the Environment Agency have also been involved, and frequent meetings have taken place with officers from DEFRA and DLUHC. This work continues to be a considerable drain on very limited council resources but despite previous requests to Government, and councils affected by Nutrient Neutrality each receiving £100,000 in funding, no funding support to resource local authorities tackling Water Neutrality has yet been provided by Government. Nationally as these are the first authorities affected by the requirement for Water Neutrality the resource implications and costs being incurred, as we learn as we go, together with Southern Water, DEFRA, DLUHC and other agencies, is considerable. We consider funding support is something which is in the Government's interest to provide as this is an issue which is likely to arise elsewhere in the country, given increasing pressure on water supplies across the UK. The solutions and approaches we can agree could be used as a template to help other impacted areas in the future.

The Strategy has calculated the amount of development planned in the Sussex North area, and the water offsets which will be needed to enable this development to go ahead. The Strategy will though need to be supported by a detailed Implementation Offsetting Scheme before development can



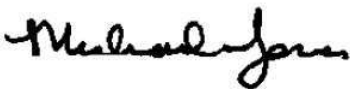
finally be permitted once again. Offsetting will be needed to ensure that development can be made water neutral, and the Strategy has identified credible sources of offsets. These offsets include the provision of water efficiency measures by Southern Water which are already included in the current Water Resource Management Plan (WRMP19). The Southern Water offsets are essential, but insufficient in themselves to meet all the development now planned in emerging Local Plans. Further, they are also not available until 2025. The authorities have written to OFWAT, as they are concerned about the robustness of regulation over Southern Water, given how critical their contribution to the water offsets is to the success of the overall Strategy, and to enabling development to progress in the Sussex North area.

The fact that Southern Water cannot meet all the offset requirements to support planned growth in the area means the authorities have needed to identify sources of further water offset measures, for example through retrofitting Council-owned and other social housing stock. The Council-led Implementation Scheme for these additional offsets will be challenging to successfully deliver and needs to get up and running quickly as the required offsets need to be in place before any new development can be occupied. With Southern Water unable to provide any offsets until 2025, development in the area over the next 3 years is reliant on the council-led Scheme being delivered. Ultimately, developers will fund the Scheme and its operating costs by buying the offset “credits” they require. However, funding is needed now to support the recruitment and salary of a Project Manager to develop and run the Scheme, and to expand on the pilot retrofitting schemes and accelerate their delivery, which can then build up a “bank” of available water offsets for future developers to buy into.

This letter is therefore a request for additional funding support to the local authorities, similar to that provided for authorities affected by Nutrient Neutrality, and for upfront funding or perhaps a no-interest loan facility, to kick start the Offsetting Implementation Scheme.

We look forward to your response,

Yours sincerely



**Councillor Michael Jones**  
Crawley Borough Council



**Councillor Jonathan Chowen**  
Horsham District Council



**Councillor Jonathan Ash-Edwards**  
Mid Sussex District Council



**Councillor Paul Marshall**  
West Sussex County Council



**Trevor Beattie**  
Chief Executive Officer  
South Downs National Park  
Authority



**Councillor Eileen Lintill**  
Chichester District Council

## Appendix D – E-mail from Clark Gordon (SNOWS) to MHCLG (was DLUHC) requesting various resource support – April 2023

Hi XXX,

It was good to be introduced to you at the Sussex North Water Neutrality Chief Executive Board meeting last week. The meeting notes will be distributed mid next week.

One of the actions on me was to send you the current legal questions that we have, so that you can review them and see whether DLUHC may be able to provide any comments to save us time and legal costs. I've done you one better and attached the Questions Log/List for the project – there is a specific section for legal questions, but I thought you may be interested in seeing the other types of questions and concerns that we have at this stage.

Any advice that you can provide on any of the legal or other questions would be very much appreciated.

Hopefully we have made clear that I am going to need additional funding and support to make this project a success. I'm currently the only full-time person working on the project and in particular right now I would really appreciate any potential support DLUHC could offer with comms & engagement and process & data management (i.e. the development of the scheme processes, registers and reporting functions).

I look forward to hearing from you in due course and please feel free to reach out if you'd like to setup a meeting or have any queries...

Thanks,

**Clark Gordon**

Water Neutrality Project Manager

**Telephone:** 07557173594

**Email:** [Clark.Gordon@horsham.gov.uk](mailto:Clark.Gordon@horsham.gov.uk)



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**Horsham District Council, Parkside, Chart Way, Horsham, West Sussex RH12 1RL**

Telephone: 01403 215100 (calls may be recorded) [www.horsham.gov.uk](http://www.horsham.gov.uk) Chief Executive: Jane Eaton



## Appendix E – Relevant meeting notes from SNOWS, HDC, CBC & Defra meeting – July 2023

Monday 31 July 2023 - 14:00 - 14:35

### Attendees

[redacted] - Defra  
Clark Gordon - WN PM  
[redacted] - HDC  
[redacted] - CBC

### Notes

...

Defra: Top-down approach being used in Cambridge, as opposed to the "organic, bottom-up approach" in Sussex North.

CBC: You say "organic, bottom up" for Sussex North, but what's the difference? We've been asking for funding for years.

CBC: Ministers haven't even responded to our letters; then officers have to come to our meetings and defend. How can we get an answer?

Defra: Re: Ministers - they are dealing with NN at same time; but we also want to come up with solutions, not just problems to take to them.

Defra: DLUHC have policy levers, which they are using in Cambridge.

Defra: Letter fell during lots of ministerial changes.

HDC: But we've followed up many times.

CG: We have recently raised with PAS, and they said the LGA will raise on our behalf. As CH says, it has effectively been a standing agenda item at Exec Board meetings.

HDC: Frustration is that we've done a lot of the work already. Implementing 'working groups' sounds like you're starting again in Cambridge. With a bit more funding we could probably help Cambridge get to be where they need to be much quicker. We've already got some established relationships with Cambridge.

CBC: We've done a pilot already on Crawley Homes stock; savings already agreed with NE etc.

Defra: What support is required?

HDC: Funding. Local authorities had to submit bid via the LEP for £100k funding for CG's post, but once that runs out we have no further available.

CG: NN funding bid - PAS indicate no update until end of Aug. We don't even know if our bid will be accepted because it is a nutrient fund, but it would be good to know if we are likely to be even considered. Otherwise we are also looking at other options like the Planning Skills Delivery Fund (PSDF).

Defra: NN fund is DLUHC? CG: Yes. Defra: But we can still check with our contacts at DLUHC on the status of this.

CBC: Issue with the PSDF will be the sheer volume of applications, so again a question around whether our bid would be successful.

Defra: Could Defra offer any support on the technical side of things?

CG: PAS NN Network meeting last week, went through the NN Register that Defra are creating for NE. This could easily be amended for water neutrality needs by amending some of the fields. It would be good of Defra's IT team could help support that, as CG does not necessarily have the expertise or resources to make those changes. That would be a huge assistance to us.

CG: [redacted] is the Defra contact that I am going to reach out too - she seemed to be open to sharing with us, at least in its current form for NN purposes.

...

CG: Legal is another area where we require fairly urgent support. CG thinks he sent the project's 'Question List' to Defra previously, which outlines our key legal queries.

Defra will review any type of legal support that Defra can offer.

...

CG: We are happy to help develop common standards and frameworks, but we are near the point of needing more certainty of funding to move forward.

...

CG/HDC/CBC stressed that the attendee [for the next Water Neutrality Executive Board meeting] will need to answer questions on the Cambridge funding situation compared to Sussex North, and be well briefed on the situation.

## Appendix F – E-mail from Clark Gordon to Defra (cc'd MHCLG, was DLUHC) providing details of funding bids made in advance of the Autumn Budget – November 2023

Hi XXX,

One of the actions on me at the last Water Neutrality Exec Board meeting was to provide you with copies of the funding bids that we have submitted this year, which will helpfully provide an overview of our forecast overall project costs, immediate funding needs and the immediate, 'on the ground' impacts that water neutrality requirements are having on the local authorities.

Please see attached the following bid submissions:

- April – submission to the Ofwat Water Discovery Challenge. This did not proceed because we did not meet the entry criteria for the fund.
- May – submission to DLUHC's Local Nutrient Mitigation fund, on advice from DLUHC for us to submit a bid. Our bid was capped at £100,000. We have received no updates on our bid since submission.
- September – submission to DLUHC's Planning Skills Delivery Fund. We bid for £250,000 on behalf of the 6 affected authorities for water neutrality purposes. We have received no updates on our bid and note that the deadline of October for the announcement of successful local authorities has now passed. I understand that some of the affected authorities also made separate bids to the backlog pot of funding.

I trust that this information will be useful as government considers funding needs in the upcoming autumn statement. If there's any further information that we can provide that would support our cause, please do let me know.

Otherwise, I look forward to speaking to you in due course.

Thanks,

**Clark Gordon**

Water Neutrality Project Manager

**Telephone:** 07557173594

**Email:** [Clark.Gordon@horsham.gov.uk](mailto:Clark.Gordon@horsham.gov.uk)



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**Horsham District Council, Parkside, Chart Way, Horsham, West Sussex RH12 1RL**

Telephone: 01403 215100 (calls may be recorded) [www.horsham.gov.uk](http://www.horsham.gov.uk) Chief Executive: Jane Eaton

# Appendix G – Relevant meeting notes from Southern Water & SNOWS introductory meeting – March 2023

Monday 6 March 2023 - 14:00 - 15:15

## Attendees

Clark Gordon – Water Neutrality Project Manager, SNOWS  
[redacted] – Southern Water (SW), Development Support Specialist  
[redacted] - SW, Future Growth Lead  
[redacted] - Consultant for SW

## Apologies

[redacted] - SW, Water Strategy Manager

## Notes

...

CG advised that some of the known risks at this stage relate to forward funding and capacity support / resource.

...

**• SW contributions / support (CG) - *it would be useful to understand what, if any, financial or other contributions SW can make towards the operation of the scheme?***

There is an open invitation for CG to use the SW comms channels for engaging with developers etc, including their newsletter and their webinars/events, including speaking slots as required. CG noted that he is intending to produce a newsletter... for the scheme's...stakeholders. SW advised that their newsletters have had positive feedback from those receiving it.

[redacted] advised that SW are not in a position to offer any financial support at this time.

SW can offer:

- Potential alignment with pilot studies
- [redacted] as a close liaison contact with the project
- Linking with the T100 project work
- Utilising existing SW comms routes

[redacted] advised that she is the Chair of the Waterwise sub-group on Water Neutrality, so this will be another good forum to use / share with.

## Appendix H – Future Homes Hub Water Neutrality Forum – relevant outputs of March 2023 meeting

...

### Introduction

Building homes that have a net positive impact on the environment is an important goal for the sector. Against that context, there are some instances in the immediate term where acute pressures on the environment have stopped development going ahead. This includes the water neutrality situation in North Sussex.

To help inform solutions for well-designed development to go ahead while achieving environmental outcomes, the Department for Environment Food and Rural Affairs asked the Future Homes Hub to convene a workshop to bring the stakeholders involved in the Water Neutrality zone in North Sussex together to understand the root causes for the zone, what shared solutions there may be and what lessons can be learnt for the future. The workshop took place on 28th March 2023.

Participants included developers, water companies, local authorities, Ofwat, consultants and agencies and together, they reviewed the issues surrounding the Water Neutrality zone in North Sussex, explored respective roles in addressing the situation and reviewed lessons learned. In addition, the attendees reviewed emerging prospects in other water stressed areas and what approaches should be taken in future to managing pressures on water supply and their potential impact on environmental objectives.

This report summarises the discussion.

### Issues for resolution in North Sussex

Most immediately, the local authorities in the area need support to help them set up an offsetting scheme – funding and staff, legal and other resource. They would look to DLUHC and Defra to provide this...

### Proposals identified for the future

...

- Local authorities need additional resources from central government in order to establish and operate their own offsetting and mitigation schemes to facilitate solutions that can enable new development to proceed.

...

## Appendix I – Future Homes Hub Water Neutrality Forum – relevant outputs of November 2023 meeting

...

### Concern over [SNOWS] funding and staff resources

- **Specialised legal support** is needed beyond what LPAs can normally provide:
  - No contracts are set up for these schemes
- **Scheme staff resources needed:** 1 Dedicated project support officer, 2 someone securing properties for the scheme, 3 technical support (registers) – where can funding come from?
- **There is a known funding gap** – developer contributions will not be sufficient initially to meet funding requirements.
- Advised by DLUHC to apply for nutrient neutrality funding or Planning Skills Delivery Fund (250k bid). No current Water Neutrality Fund available.

### Other points and questions

- ...
- Would it be feasible for Homes England to provide financial help?
- Could developers provide money to meet the initial funding gap for operating the local authority offsetting scheme? **It was agreed this was worth exploring.**

# Appendix J – Relevant notes from meeting between SNOWS, West Sussex County Council and Planning Advisory Service – July 2023

Thursday 20 July 2023 - 10:00 - 11:10

## Attendees

[redacted] - PAS

Clark Gordon - WN PM

[redacted] - WSCC

## Notes

WSCC overview of SNOWS scheme, local authority work done to date, and main issues that the authorities are facing.

CG noted that legal support is currently our most critical need. We have been advised by Defra/DLUHC that they are trying to get Water Neutrality (WN) on an equal footing to Nutrient Neutrality (NN), but we don't feel like we are there yet in terms of financial and non-financial support. We have applied to DLUHC's NN fund, on advice from DLUHC.

PAS: PAS is part of the LGA. Nutrient programme funded by DLUHC.

PAS: Any lobbying angle, we can bring in the LGA to support. We can setup a meeting to move this forward. This will be important for the Local Plan submission.

CG: Any support networks that PAS are aware of would be useful to be plugged into. I was invited to the NN Network by Defra a few months ago, but never had any follow-up.

PAS: We are in the NN network - **Action** on RJ to send meeting invite to CG - there is a meeting next Tuesday. There is a BNG & NN network on *Basecamp* - where questions are posed. Could be good for legal advice...

PAS: PAS got legal advice for NN - **Action** on RJ to share link. Getting more advice to look at strategic solutions. There's been some articles in...Habs Reg journal exploring similar questions about strategic solutions.

CG: Mentioned the C G Fry decision - just to note that HDC has published advice on their website setting out that this will have a big impact for WN in Sussex North too, especially for HDC (e.g. affecting some strategic sites). There was an article in ENDS Report a couple of days ago that flagged this advice. This means that there are now a lot more developments that need to meet WN requirements, which will place additional burdens on SNOWS.

PAS: Please send details of implications to RJ - they will make sure this is raised with government.

**ACTION:** CG to send details of the C G Fry implications to RJ

...

WSCC: worth pointing out that as well as the impact on housing delivery, it is also affecting LA funding, planning resources, infrastructure money. No support from central gov.

PAS: Only NN money issued to LAs was the £100k - aware WN auths didn't get that.

WSCC: Our auths keep pushing for lobbying support, particularly at CEX meetings.

...

WSCC: What support can be provided by PAS?

PAS: Joining the NN Network and basecamp will be useful in the first instance. Not funded to help with WN, only NN. We are doing work on water resources. Bring in LGA to support lobbying.

WSCC: Do we need to push our Chief Execs - do we want to lobby for PAS to get some funding to deal with WN issues?

PAS: We work on whatever DLUHC want us to work on.

...



## Appendix K – Letter to Rebecca Pow, MP - Minister for Environmental Quality and Resilience (Defra) – September 2023

Minister Pow  
House of Commons  
London  
SW1A 0AA

Sent by email - [rebecca.pow.mp@parliament.uk](mailto:rebecca.pow.mp@parliament.uk)

21<sup>st</sup> September 2023

Dear Rebecca Pow

### **Water Neutrality: Sussex North Water Resource Zone**

We are writing to you as the Parliamentary Under Secretary of State (Minister for Environmental Quality and Resilience) with your brief including water. We wrote to your colleague, Minister Harrison, on 14<sup>th</sup> November last year when her brief at the time included water. We attach our previous letter for convenience. Unfortunately, we are yet to receive any formal acknowledgement or full response to our November letter, whilst the situation in West Sussex continues to deteriorate.

Once again, we are writing on behalf of local authorities in Southern Water's Sussex North Water Resource Zone area: Horsham District Council, Crawley Borough Council, Chichester District Council, Mid Sussex District Council, the South Downs National Park Authority, and West Sussex County Council.

For brevity, we will not repeat the background to our issues in West Sussex, which are explained in detail in our previous letter, and we trust that you are being updated on the situation here. What we will say is that the impacts are still being greatly felt in terms of the delivery of new homes and growth, with over 20,000 new homes and over 10,000 new jobs now delayed, as well as supporting infrastructure such as schools, with the subsequent economic impacts that has residents needing new homes, the councils, local businesses, and the area overall.

Principally, we are writing to you to express our disappointment to read about the substantial financial and technical support being provided to Cambridgeshire councils to support their water resource issues. We of course, do not object to the support in principle, but that it has been offered to Cambridge without any form of reciprocal support, nor even any acknowledgement to previous correspondence, for us in West Sussex. We could be much further forward by now had we had anything like a similar level of support when we began asking two years ago when the requirement for water neutrality was placed upon the North West Sussex area. Continued Government delays in responding to our letter and the absence of government support, make it increasingly difficult to implement our offsetting scheme – the Sussex North Offsetting Water Scheme (SNOWS) – more effectively, so we still welcome any opportunity to accelerate the project and unlock much needed homes and jobs in the area.

Whilst SNOWS is being developed as fast as we can, its delivery has been organic or 'bottom up' by necessity and has been slowed by a lack of funding and technical support to develop the project. We have already made a bid in May to the Local Nutrient Mitigation Fund, on advice from DLUHC, and are awaiting the outcome. We have also now submitted a bid for the Planning Skills Delivery Fund, in the hope that this may be another route to funding our unique issue, which we still do not feel is getting the recognition or support that it needs from Government. We continue to explore other government and private funding opportunities in the meantime.

We continue to request, as a minimum, the same level of financial support provided to those local authorities affected by nutrient neutrality requirements. However, considering the support proposed for Cambridgeshire,

we suggest that we are further advanced towards being able to provide pilot studies, which is what we understand at least some of the Cambridgeshire funding is to be used for. North West Sussex already has two years' worth of knowledge and expertise on water resources and the delivery of development, which is at risk of unnecessary replication at the taxpayers' expense, and with joint resourcing would enable knowledge, learning and resources to be shared more widely and unlock development more quickly. Indeed, we have already successfully undertaken one pilot study on Crawley Homes' affordable housing stock, which we have now rolled out more widely on the council's stock, and which is being widely circulated as a case study for the water offsetting approach. Any technical support, including legal support, that DEFRA can provide would also be helpful to us getting to a solution more quickly.

Since our November letter, the impacts of water neutrality on the West Sussex local authorities have been exacerbated by the recent *C G Fry v SoS LUHC & Somerset Council* High Court decision, handed down at the end of July, which we estimate has brought in an additional 1,400 dwellings – plus for example additional applications for commercial developments, holiday lets, and strategic minerals & waste sites – facing water neutrality requirements, which were previously considered exempt. Many of the dwellings are in the latter stages of completion or have already been completed, so this ruling has had a substantial impact on an already challenging situation. Many developers are facing serious consequences, including having to stop construction of partially built schemes and having their businesses threatened, which we are doing all we can to support them through, but it is challenging with the resources available to us.

Also, since our previous letter, we have made good progress to put in place local measures to support the delivery of local plan growth, including through the development of a joint water neutrality local plan policy. The policy has already been through Regulation 19 consultation with Chichester DC and Crawley BC, with the latter having recently submitted their plan for examination, which will be the first national test that we are aware of for a policy requiring such a stringent water efficiency target over such a large area. We have also, thanks to a successful seed funding grant from the Coast to Capital Local Enterprise Partnership, employed a Water Neutrality Project Manager to develop and implement the authority-led offsetting scheme – SNOWS – development of which is underway.

We continue to engage with your staff through our Water Neutrality Executive Board meetings but have found attendance or updates from DEFRA to be lacking at times, which adds to our concern that water resource issues in West Sussex are not being given adequate consideration, although we are assured by your staff that is not the case. We met recently with Aaron Burton in a meeting on 31<sup>st</sup> July to escalate these issues and raised them again with Martin Woolhead at our Executive Board meeting on 11<sup>th</sup> September. We hope that this letter and our previous correspondence makes clear to you our concerns but also that we feel we can deliver what is needed to support our authorities' local plan growth with the right level of central government support. We trust that you will support us with our ambitions.

We look forward to your response.

Yours sincerely

**Councillor Michael Jones**  
**Crawley Borough Council**

**Councillor Martin Boffey**  
**Horsham District Council**

**Councillor Robert Eggleston**  
**Mid Sussex District Council**

**Councillor Paul Marshall**  
**West Sussex County Council**

**Trevor Beattie**  
**Chief Executive Officer**  
**South Downs National Park**  
**Authority**

**Councillor Adrian Moss**  
**Chichester District**  
**Council**

## Appendix L – Response from Robbie Moore, MP - Minister for Water and Rural Growth (Defra) – November 2023

Cllr Michael Jones  
Crawley Borough Council  
Town Hall, The Boulevard  
Crawley, RH10 1UZ

[redacted]@crawley.gov.uk

Robbie Moore MP Parliamentary Under Secretary of State for Environment, Food & Rural Affairs  
2 Marsham Street  
London  
SW1P 4DF  
T: +44 (0) 3459 335577  
E: correspondence.section@defra.gov.uk  
W: gov.uk/defra

Our ref: PO2023/18504/SO

29 November 2023

Dear Cllr Jones and other signatories,

Thank you for your joint letters of 14 November 2022 and 21 September to Trudy Harrison MP and Minister Pow respectively about nutrient neutrality. I am replying as the Minister responsible for this policy area, and apologise for the delay in doing so.

The Environment Agency's review of draft Regional Water Resource Plans found that by 2050 an additional 4,000 million litres of water per day would be needed in England to meet future demand. Approximately half of that amount needs to be delivered through demand management measures (reducing leakage, household, and non-household consumption). To address this, the Government has set a new legally binding target under the Environment Act 2021 to reduce the use of our public water supply in England by 20% per person by 2038.

Our Plan for Water and Environmental Improvement Plan set out our roadmap for water efficiency in new developments and retrofits, to be delivered over the next decade. This includes 10 actions, such as reviewing building regulations and delivering clear guidance on 'water positive' or 'net zero water' developments, including water company incentives.

Working closely with water regulators, we will continue to ensure water companies are also increasing the supply of water across England and that their statutory water resources management plans show how this will be delivered.

We are also working with the Department for Levelling Up, Homes and Communities (DLUHC) to address issues of water scarcity impacting on development. In the long-term plan for housing DLUHC announced support for making new homes more water efficient and £3 million funding to support improving the water efficiency of existing homes and commercial property across Cambridge. This will help offset demands created by new developments in the local plan. We will ensure the focus provided by the Cambridge Water Scarcity Working Group, will help us support other areas, including North Sussex, in addressing these issues.

As outlined in your letter my officials will continue to engage with your teams, including a recent update meeting around the work on water credits in North Sussex. I would then welcome the opportunity to meet

with you in person and discuss ways that we can jointly work together to address water scarcity and development.

With kind regards.

Yours sincerely,

ROBBIE MOORE MP  
Parliamentary Under Secretary of State for Environment, Food & Rural Affairs

# Appendix M – Letter to Robbie Moore, MP - Minister for Water and Rural Growth (Defra) following May meeting – June 2024

Minister R Moore MP  
Department for Environment, Food & Rural Affairs  
2 Marsham Street  
London  
SW1P 4DF

17 June 2024

By email

Dear Minister Moore

## Water Neutrality – Sussex North Water Resource Zone

I am writing on behalf of all authorities affected by this issue to thank you for your time on 21 May. Each of us came away hopeful that we may achieve traction on this issue, based upon what we thought was a positive meeting. Whilst the announcement of the General Election the following day may impact on some of that momentum, our sincere hope, given the impact on our communities, is that we can start to put some of the pieces in place.

As agreed therefore, we are writing to set out:

- Impacts of water neutrality
- Repeat the asks made at the meeting
- Potential quick wins and levers not being used

The impact on the Sussex North Water Resource Zone has been and will continue to be substantial without intervention. It is important to note that Southern Water states there is no guarantee to move out of Water Neutrality prior to 2040. Based upon the emerging local plans for the local authorities affected, this puts at risk:

- Around 20,000 homes, which includes around 3,000 current planning applications delayed by the requirements
- Employment for around 10,000 people
- The provision of new and expanded educational facilities
- Health care provision
- Leisure and tourism facilities
- Rural and agricultural developments
- Minerals and waste facilities

At our meeting, it was clear that you recognise this is not only an issue for North Sussex. Whilst we remain the only area of the country under Water Neutrality restrictions, water scarcity is a growing problem nationally. The above impacts will be replicated across the country unless solutions are found.

This is not a problem of our making. There is a policy disconnect between long-term infrastructure planning, environmental policy and government ambitions around growth and housing. This is a legacy of departmentally siloed decision making without the impact analysis of how these different decisions compound to impact upon place. Yet as local authorities, we are being left to try and manage these failures alone through the planning system.

Whilst this is clearly not tenable, the authorities in the Sussex North Water Resource Zone have stepped forward to meet this challenge, most notably:

- Putting in place a process within the planning system that is both acceptable to Natural England, whilst also giving confidence to the Planning Inspector in relation the emerging Local Plans
- Within Crawley, piloting the retrofitting of social housing stock with water flow regulators, reducing water usage, generating water credits to allow the development of new social housing

This represents significant progress given that the processes involved have had to be designed from scratch. Whilst we now have a system that operates, the complexity involved gives us real concern about the practicality of developing credits at a scale that allows us to deliver our community needs through the planning system.

Social housing in West Sussex is fragmented with two-thirds owned by registered providers who are under no obligation to retrofit, or to provide access to their credits even if they do (as credits will have a significant commercial value). The requirement to be able to apply planning enforcement also means the complexity is likely to be too great for the vast majority of owner occupiers. If sufficient credits cannot be generated, then development cannot take place.

We are approaching the limit of what we as local authorities can achieve on our own. Whilst we are meeting regularly with representatives of Government Departments, arms-length Governmental bodies and Southern Water, none of them are offering solutions to the situation we are facing. It was for this reason we approached you with our three asks, summarised as follows:

1. Stop seeking to manage water shortages through the planning system and instead focus more on the Water Resources Management Plan process. It is after all a failure in that process that has seen infrastructure planning fall behind water usage and created this problem, yet currently it is local communities who will suffer and not those that are responsible.
2. Government nominates a senior civil servant to oversee the management of water neutrality. Our regular meetings are attended by DEFRA, the Environment Agency, DHLUC and Natural England. However, the civil servants sent are mostly inexperienced in this matter and many attend only one or two meetings before they are moved on to other work. We need someone in government to understand these matters properly, coordinate between your departments and scrutinise the work Southern Water are doing.
3. All costs borne by local authorities as a result of Water Neutrality should be recompensed. It is with frustration we have seen £9m provided to South Cambridgeshire, an area with water scarcity but not yet with water neutrality restrictions in place. Local taxpayers should not be subsidising the failings of long-term infrastructure planning.

When we met, you asked for any quick wins. Our suggestion, which would see a substantial reduction in water usage producing water credits to aid future development, is that: instead of the



owners of residential units being asked to retrofit water flow regulators (as Crawley has done), we would ask that Southern Water is required to do so as part of the Water Resources Management Plan. Southern Water is already proposing a mass roll out of water metering. It could also insert these regulators at scale across its network. The model is proven, and because of the commercial value of the credits, would be cost neutral or even cost positive.

A further quick win would be the rezoning of supply areas for new and existing developments close to the boundary with other water companies. This has already been done for a 1,900 home new neighbourhood in Crawley, and we believe there are other development proposals that could benefit. If Southern Water does not have sufficient water to serve its area, but neighbouring water companies do, why should it not be easier to switch supply?

You also asked whether there were additional levers that could be used. We would point again to the core issue, namely the disconnect between utility infrastructure planning, environmental considerations, and planning. There should be much greater emphasis on the long-term water needs of a region within the Water Resources Management Plan to meet housing, economic and infrastructure growth.

Whilst we understand the announcement of a General Election creates some wider uncertainty, we hope that your department can nonetheless progress these matters. The timing is particularly crucial given that Southern Water's Water Resource Management Plan is soon to emerge for consultation. We would be very open to further meetings either with elected representatives or key senior officers.

Yours sincerely

A handwritten signature in black ink, reading "Martin Boffey". The signature is written in a cursive style with a long, sweeping flourish extending to the right.

**Cllr Martin Boffey**  
Leader of Horsham District Council

# Appendix N – Letter to Emma Hardy, MP - Minister for Water and Flooding (Defra) – September 2024

Emma Hardy MP  
Parliamentary Under-Secretary of State  
(Minister for Water and Flooding)  
Department for Environment, Food and Rural Affairs  
Seacole Building  
2 Marsham Street  
London  
SW1P 4DF

Our ref: MB/SA

26 September 2024

By Email

Copies: Secretary of State  
[Defra officers]

Dear Ms Hardy

Congratulations on your appointment to the role of Parliamentary Under-Secretary of State (Minister for Water and Flooding). I am writing to you on behalf of the authorities in Southern Water's Sussex North Water Resource Zone area affected by 'water neutrality' requirements through the development planning system. We are Crawley Borough Council, Chichester District Council, Horsham District Council, Mid Sussex District Council, the South Downs National Park Authority and West Sussex County Council.

We recognise that water neutrality issues affect a much smaller group of authorities than those of nutrient neutrality, but the consequences of water neutrality have caused significant impacts in terms of stalling development on the affected local authorities. We note your Government's recognition of the need to find a strategic solution for nutrient neutrality and request that you also consider how water neutrality issues could equally be addressed strategically.

We engaged with your predecessor, but our issues gained little traction until earlier this year. We hope that we can meet you to build on the constructive conversations that began in May. We would very much like to continue this discussion with you because we have the longest experience in the country of water restrictions and because 20,000 houses and the economic growth arising from these are currently held up.

We provide further background to our issues below.

## Background

Water neutrality has come into effect because Natural England has identified a serious adverse impact on the internationally protected habitats of the Arun Valley located in West Sussex. It cannot conclude that water abstraction (for potable supplies) in the Arun Valley area is not contributing to this decline. Natural England therefore issued a Position Statement in September 2021 preventing new development coming forward unless it can be proven not to make this situation any worse, in order to comply with the Habitat Regulations 2017.

In order to ensure that new development does not contribute to any further harm, new development cannot come forward unless it can be shown to be water neutral (in other words does not increase the demand for water abstraction above existing levels). North West Sussex is the only local authority areas in the UK that have been designated as such. You may be



aware that the Cambridge area is also facing issues of water scarcity, but this does not have the same legislative driver.

The situation since 2021 means that local planning authorities in the Sussex North area are unable to permit planning applications unless they can demonstrate 'water neutrality'. In addition to ensuring that new development is as water efficient as possible, in many cases this requires an applicant to 'offset' their development's water use by reducing water use elsewhere within the Water Resource Zone.

This is having serious consequences for the delivery of new homes and economic growth in the affected area and has also significantly delayed the preparation of Local Plans which we recognise is a priority for the new government. The impact has been and will continue to be substantial without intervention. It is important to note that Southern Water states there is no guarantee of moving out of Water Neutrality prior to 2040. Based upon the emerging Local Plans for the local authorities affected, this puts at risk:

- around 20,000 homes, which includes around 3,000 current planning applications delayed by the requirements
- employment for around 10,000 people
- the provision of new and expanded educational facilities
- new or expanded health care provision including GP surgeries
- leisure and tourism facilities
- rural and agricultural developments
- minerals and waste facilities

This is not a problem of our making. There is a policy disconnect between long-term infrastructure planning, environmental policy and Government ambitions around growth and housing. Yet, as local authorities, we are being left to try and manage these failures alone through the planning system which is not designed to deal with such issues.

Recognising the significant issues we face, the affected authorities have worked effectively to carry out substantial joint work on the matter to develop a strategic solution comprising a shared strategic planning approach through Local Plans, and the development of a local authority-led water offsetting scheme to provide developers with a reliable, affordable offsetting solution.

This work continues to be a considerable drain on very constrained council resources, but despite previous requests to Government, we have received no financial support beyond the £250,000 bid we successfully made to the Planning Skills Delivery Fund last year. Nationally, as we are the first authorities affected by the requirement for water neutrality, the resource implications and costs being incurred by the authorities, even working together with Southern Water, DEFRA, MHCLG, and other agencies, are considerable. We are aware that other areas of the country are now also facing water scarcity challenges, and these challenges are expected to extend across much of the south of the UK in the period to 2050. We consider funding support is something which is in the Government's interest to provide as Sussex North is in effect a front runner, and the solutions and approaches we can agree could be used as a template to help other impacted areas in the future. Where funding has been provided to other areas such as Cambridge, our experience is that the first 'port of call' to appointed consultants or specialists has been to approach Sussex North in any event.

### **Offsetting solution challenges**

As Local Planning Authorities we are developing a system that will use water savings from one part of the water supply zone, to help offset increases in demand for water abstraction generated by new development. A significant proportion (around 80%) of the 'offsets' that the local authority scheme will provide includes water efficiency measures to be provided by Southern Water and which are included in their delayed Water Resource Management Plan (WRMP24). These measures range from leakage reduction to significant new water infrastructure. The Southern Water savings identified in their plan are essential to unlock housing and other development in North West Sussex, but insufficient in themselves to ensure that all development now planned in emerging Local Plans, much less the Government's new housing targets, can be delivered in a way that achieves water neutrality. Further, the Southern Water savings are not available until 2025 at the earliest.

We have previously written to and engaged with Ofwat through our Executive Board to raise our concerns about the robustness of regulation over Southern Water, given how critical their water offsets contribution is to the success of our overall water neutrality strategy in enabling development to progress in the Sussex North area. In August 2024, we raised concerns with Ofwat about their WRMP24 Draft Determination Decision for Southern Water, which we consider does not sufficiently account for the significant issues that water neutrality requirements are causing and how funding can be allocated by Southern Water accordingly to help mitigate the impacts as a priority.

The fact that Southern Water cannot meet all the water resource requirements to support planned growth in the area in a way that is water neutral means the authorities have needed to identify sources of further water offset measures, for example through retrofitting Council-owned and other social housing stock. The council-led scheme to provide these additional offsets is proving challenging to set up, being without precedent, with challenges in resourcing liaison with offsetting providers, legal matters by way of example. Ultimately, developers will fund the offsetting scheme and its operating costs by buying the offset "credits" they require. Whilst good progress has been made on the scheme, funding has to date been 'at cost' to the authorities and is now needed to support provision of water offsetting measures in the area to provide additional "credits" for the scheme. Funding this from current local authority budgets is significantly challenging and presents a high risk to the authorities.

### **Our previous asks**

In May this year we met with the then DEFRA minister Robbie Moore. In our most recent correspondence to him, we made three asks of your department. We have reviewed and reiterate these asks below:

1. In consultation with affected LPAs, and other stakeholders look for Southern Water to resolve the water shortages through their Water Resource Management Plan rather than using the planning system. It is after all a failure in that process that has seen infrastructure planning fall behind water usage and created this problem, yet currently it is local communities who will suffer rather than those who are responsible.
2. Government nominates a dedicated senior civil servant/s to oversee the management of water neutrality. Our regular Executive Board meetings are attended by DEFRA, the Environment Agency, MHCLG and Natural England. However, the civil servants sent are often inexperienced in this matter and many attend only one or two meetings before they are moved on to other work. We need someone in Government to provide consistency to understand these matters properly, coordinate between Government departments and scrutinise the work Southern Water are doing.
3. All costs our local authorities have incurred as a result of water neutrality be met by Government. It is with considerable frustration we have seen £9m provided to South

Cambridgeshire, an area with water scarcity but not yet with water neutrality restrictions in place, and who as outlined above have turned to north west Sussex for advice in any event. Local taxpayers should not be subsidising the failings of long-term infrastructure planning.

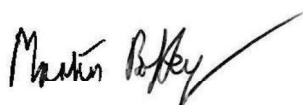
We have also put together our ideas for 'quick wins'. We suggested the following:

1. One way of delivering reductions in water usage is the installation of water flow regulators. A trial undertaken by Crawley Borough Council has shown this to be effective in both water, and other energy savings, with positive impacts reported by residents. At the current time the fitting of regulators is being led by the local authorities or third-party suppliers. Our first suggestion, which would see a substantial reduction in water usage producing water credits to aid future development, is that: instead of the owners of residential units being asked to retrofit water flow regulators, Government require Southern Water to do. Southern Water is already proposing a mass roll out of smart water meters. It could also insert these regulators at scale across its network. The model is proven, and because of the commercial value of the credits, would be cost neutral or even cost positive. We understand that this has been carried out by other water companies across the country already.
2. A further potential quick-win would be the re-zoning of water supply areas for new and existing developments close to the boundary with other water companies which are not using the Arun Valley water supplies, and therefore not bound by the requirement for water neutrality. This has already been done for a 1,900 home new neighbourhood in Crawley, and we believe there are other development proposals that could benefit. If Southern Water does not have sufficient water to serve its area, but neighbouring water companies do, why should it not be easier to switch supply?

Finally, the Minister asked about any additional levers that could be used. We noted that the core issue is the disconnect between utility infrastructure planning, environmental considerations, and planning. There should be much greater emphasis on the long-term water needs of a region within the Water Resources Management Plan to meet housing, economic and infrastructure growth.

Clearly our main aim in writing to you is to seek some quick action to lessen these problems and to ensure we have enough water for the new homes you have said you would like us to build. We would like to meet with you to discuss our issues and suggested solutions. But discussion or not we need your help to deliver much needed housing, job opportunities and growth across the Sussex North area. We do not want our communities to die because we cannot build and if we do, don't have enough water to go around.

Yours sincerely



**Councillor Martin Boffey**

Leader of Horsham District Council

On behalf of the authorities in the Sussex North Water Resource Zone

## Appendix O – Letter from Emma Hardy, MP - Minister for Water and Flooding (Defra) – November 2024

Councillor Martin Boffey  
Leader, Horsham District Council  
Parkside, Chart Way  
Horsham, West Sussex  
RH12 1RL

Your ref: MB/SA  
Our ref: PO2024/19061/SH

12 November 2024

Dear Councillor Boffey,

Thank you for your letter of 26 September on behalf of the authorities in the Sussex North Water Resource Zone about water neutrality. I apologise for the delay in replying.

The government is committed to building one and a half million new homes across the country over the next five years to tackle our housing crisis and boost economic growth. To do this, we will implement solutions which enable development to proceed without weakening environmental protections.

We are also committed to ending the crisis in the water sector. The Secretary of State and I met water companies' chief executives on 11 July, where they signed up to a tough set of initial measures for reform. I have also met with companies that are failing in their environmental performance and made clear to them that we expect change. We will take action to secure this change through the Water (Special Measures) Bill and future reform.

As noted in your letter, it is for Southern Water to resolve the water shortages through its Water Resources Management Plan (WRMP). Southern Water's revised draft WRMP is currently out for public consultation and is required to address supply deficits across its supply zones, including North Sussex. Southern Water is expected to have fully considered opportunities within its plan for re-zoning supply areas, such as in the case near Crawley, where water availability and connectivity allows. Further opportunities for re-zoning will be reviewed by statutory consultees, including the Environment Agency (EA), in their responses to the consultation.

In addition to re-zoning, Southern Water is expected to deliver demand management options such as a rapid rollout of smart meters within North Sussex by 2027 and address the high leakage rates within North Sussex. The completion of Southern Water's investigation into the sustainability of its abstractions will also be critical to how water resources will need to be managed within North Sussex.

We would encourage all stakeholders, including Local Planning Authorities and the EA, to feed in views on Southern Water's WRMP through the current consultation, open until 4 December. Southern Water should be considering all supply and demand options and explaining its preferred best value approach.

Defra is working with regulators to closely monitor water company delivery against WRMP targets and performance checks through annual reviews. Where companies are failing to meet targets, joint regulator letters are sent setting out what they are failing on and when they must rectify these issues. As the concerns with Southern Water are considered extreme, Defra and the regulators also hold six-monthly meetings with the company.

Regarding the water neutrality statement issued by Natural England (NE), Southern Water are leading the Hardham sustainability study, due for completion in spring 2025. This includes a Habitats Regulation study which will consider the risks associated with current abstraction in relation to the protected habitats of the Arun Valley. A groundwater model is also being developed to assess the effects of abstraction and to test different scenarios. EA and NE teams are working with Southern Water on this. The outcomes of this study will be reviewed to inform management of abstraction licences in the area.

Water neutrality is a cross-government priority and we will work with other government departments, nature delivery organisations, stakeholders and the sector to determine the best way forward. We will only act in legislation where we can confirm to Parliament that the steps we are taking will deliver positive environmental outcomes.

I recognise the substantial efforts which the local authorities have contributed to tackling water neutrality issues in the Sussex North area. Defra's water scarcity and development team have been liaising with the Sussex North Offsetting Water Scheme team and will continue to do so.

I would be happy to meet with you and discuss further the water neutrality situation in Sussex North. Please contact my Private Office ([\[redacted\]@defra.gov.uk](mailto:[redacted]@defra.gov.uk)) to make arrangements.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Emma Hardy', with a long horizontal flourish extending to the right.

**EMMA HARDY MP**