



# Water Neutrality in Sussex North

**Webinar Q&A**

18<sup>th</sup> May 2023



## Thank you!

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

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

## Slide Pack

This pack is accompanied by a copy of the slides that were presented in the session on 18<sup>th</sup> May. Please do let us know if you have any further questions once you've had some time to absorb what was discussed.

## Recording

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

## Q&A

- **How effective was the RSPB project to enhance the habitat at Pulborough Brooks which concluded in 2021?**  
The [Back from the Brink](#) was a learning and awareness project. It enabled Natural England to understand the interrelationship between water levels, quality and management of the habitats as well as raising awareness. The species are still at considerable risk on the Special Areas of Conservation (SAC) in general and has not recovered.
- **The RSPB project ([Back from the Brink](#)) - is there support that the industry can provide to directly help the brooks (i.e. water polishing) rather than water offsetting?**  
Whilst we cannot speak on behalf of the RSPB, who may welcome funding of projects, the ongoing sustainability study at the key sites is progressing in partnership with all key stakeholders. This means that there will still be some uncertainty as to what actions need to be taken to preserve those sites beyond the abstraction question until the study is complete.

The primary concern for the preservation of these sites regarding the Position Statement is to ensure that new development does not worsen the abstraction



pressures on the protected sites. For planning purposes, the Position Statement requires management of the water demand through demonstration of water neutrality so offsetting must be used for the balance of demand after you have achieved maximum water efficiency and reuse within your proposal. Any proposals for mitigation and improvements on the sites is independent of the requirements of the position statement itself. The only other alternative is identification of additional water resources which forms part of our water resource management plans.

- **Can the industry or Government support a continual supply from the river (pumps etc) to ensure a consistent water level in the brooks/bogs?**

Resilience of supply is an important consideration when investigating potential options. These considerations need to consider the scenarios of river flows in drought years, meaning that this would not be a viable sustainable option. We also need to consider the differences in water quality between the river and the ditches on site, it is unlikely to be a simple transfer from one source to another.

- **Will a bulk transfer meet the water neutrality requirements?**

Available bulk transfers will not address the off sets required for Sussex North. The current bulk supply transfers into Sussex North align to the needs of our water resource management plans which sit outside the offsetting need. For more information on how these link together please refer to the [JBA Part C Mitigation Strategy](#)

- **Are SW progressing plans on bulk supply transfers?**

Discussions are underway with neighbouring water companies and form part of our wider Water Resource Management Plan ([WRMP](#)).

- **What is Southern Water doing to increase its network leakage reduction programme in Sussex North?**

We have a specific action plan for Sussex North to monitor and track leakage levels against target and will we adjust our plans as necessary. We are deploying more acoustic logging sensors, installing pressure reducing valves and conducting leak detection surveys in the area.

- **What is the evidence that development affects Pulborough Brooks?**

The Special Areas of Conservation (SAC) are recognised as globally important. Natural England have been surveying the area for a few years and have noted a decline in species and poor water quality. Over the last 30 years the site has been drying causing concerns with abstraction and the current abstraction rate at Hardham. Natural England cannot prove that abstraction is causing the problem but the law states that Southern Water need to prove that it is not contributing to the decline of the site.

- **Are you considering desalination?**

Desalination is an energy intensive process. During our Water Resource Planning we consider desalination, along with other options for producing water to serve our customers and all options are appraised for best value.



- **WaterWise Water Neutrality model update – are new developments good for water demand? Is it necessary to control population growth in these areas?**

New development brings opportunities to design landscape scale management of surface water which can be used in ways that reduce consumption and alleviate flood risks which is a positive thing. Good design and policies that enable this are essential. Southern Water do not have any authority over population growth, we factor this consideration into our water and wastewater planning, but it is not our place to seek to manage it in any way. Ultimately, we have a statutory duty to provide services to supply water and drain wastewater for any domestic property that requires us to do so.

- **To what extent does recycling of water for re-use as drinking water at Southern Water's WWTW's feature in the offsetting scheme?**

The use of water recycling is an option that we consider and would be included in our Water Resource Management Plan ([WRMP](#)), and hence sits outside of the offsetting scheme. For more information how these link together please refer to the [JBA Part C Mitigation Strategy](#)

- **Are Southern Water increasing or decreasing water abstraction from groundwater at Hardham?**

We have reduced our ground water abstraction at Hardham to an average of 5MI/d as required to do so.

- **What is Southern Water's long-term solutions?**

More information on our long-term solution as incorporated in our Water Resource Management Plan ([WRMP](#)). Consultation for this went out at the beginning of the year and our Statement of Response is due mid-June.

- **Southern Water need to prove abstraction is not having an effect at Pulborough Brooks - how will you do this?**

Southern Water are currently undertaking a sustainability study on the abstraction at Pulborough and weather this has any potential to influence the environment of the Pulborough Brooks. The results of the study are due in 2025.

- **If there are concern with water abstraction now, why is Hardham passing the HRA and getting a licence?**

The position statement and our abstraction licence are subject to separate processes.

The licence process for the relevant abstractions is subject to review which will include a range of environmental assessments, this is regulated by the Environment Agency.

The position statement is in place to manage the impacts of new developments in the Sussex North Water Resource Zone whilst the strategic proposals to improve the available water resources and replace the existing abstraction are developed and established. This interim measure is designed to work alongside the licensing

process and our WRMP. It is regulated by Natural England but applied within the planning process by the Local Planning Authorities (LPAs) who are designated as the competent authorities for planning applications in their areas.

## **Metering:**

- **Will you look to use smart meter data to monitor health i.e. Declining water use = declining health.**

Smart data provides some interesting and beneficial use cases. Health and wellbeing monitoring is an area which has seen some development from an energy metering point of view (see: [Howz | Technology Enabled Care](#)). Dependant on customer appetite this may be something we explore further as our deployment matures.

- **Will the smart reader display Per Capita Consumption (PCC)?**

Unlike energy smart meters, residential water smart meters will not display information via an in-home display. The meters themselves will display the information required to obtain a visual reading of consumption, but not anything more detailed.

The true value of smart data is unlocked by meaningful and personalised visualisation of the raw data returned from the meter- allowing us to apply different lenses. For example, some customers may have a strong interest in tracking litres per day consumption over a period, or on certain days of the week; whereas others may just want to see how their costs compare this month vs last- both are possible with good data visualisation, and we'll be developing our approach as part of the Smart rollout.

- **Will Smart meters be available to business customers?**

The non-household market is very important to us. We will initially start to look at the medium/large non household users with a wider roll out later in the programme. The non-household market is hugely important for the overall benefit delivery of the smart metering programme.

- **'I get my smart meter water use on my phone from Anglian Water in litres per person per day and it is compared to use in similar size houses near may, will this be something you will be looking at?'**

Smart data gives us fantastic opportunities to connect more with our customers and we'll be developing new ways of engaging regarding water. Anglian have some great tools and experience and we've been collaborating with them as we form our own plans which will ultimately include things like Smart Phone Apps.

## Sussex North Offsetting Water Scheme (SNOWS):

- **Will it be up to the LPA DM Teams to decide what private water offset methods are acceptable/ how they are monitored, or will Clark have an input into this?**

As now, LPA DM teams are responsible for assessing the suitability of any offset methods and details around monitoring. Applicants should continue to liaise directly with DM Officers at the relevant LPAs. It is outside the scope of the offsetting scheme, SNOWS, to review third party proposals. SNOWS will only be responsible for the administration of offsetting that sits within the scheme.

- **Will the Offsetting Scheme only be available to allocated sites within local plans?**

SNOWS is aimed at development that is supported in the relevant authority's local plan, and any neighbourhood plans which allocate development, whether that be through allocations, windfall etc. This means that there will not be capacity within the scheme for speculative development. Applicants will need to continue to find their own solutions for these developments.

- **Can you elaborate on any bespoke water solutions that have been agreed to date?**

A large proportion of the developments that have been approved since 2021 are developments where the proposed use will use less than the existing use of the site, thereby meeting neutrality requirements. For examples of other solutions, we recommend reviewing the FAQs on the Horsham District Council website, here: <https://www.horsham.gov.uk/planning/water-neutrality-in-horsham-district/water-neutrality-and-planning-applications>.

Depending on your location on interest within the Water Resource Zone, there are local authority water neutrality pages for: [Crawley Borough Council](#), [Horsham District Council](#), [Chichester District Council](#), [South Downs National Park Authority](#), and [West Sussex County Council](#).

- **How will the offsetting scheme enable planning consents that are at risk of expiring progress now, will there be an interim tariff solution?**

Currently, SNOWS is still in development and is not open to submissions. We certainly cannot guarantee a date when we will be able to accept applications at this stage. We therefore recommend that applicants in this position continue to pursue their own solutions. We are exploring various options to speed up delivery, and if there is any way that we can begin to offer access sooner than anticipated we will communicate this. However, there is a lot of work to be done before we're near that stage.

- **Are you retrofitting rainwater harvesting, capturing, and using this to reduce demand?**

Our priority option to provide offset capacity for SNOWS is the installation of flow regulators into residential properties because the solution is proven, and we have high-cost certainty and high effectiveness certainty. The savings achieved with this methodology have been agreed with Natural England.

However, we will need to use other offsetting solutions to provide additional capacity within the scheme, and the installation of rainwater harvesting systems, and other water efficiency measures, is another 'strand' of the project offset capacity. These options are a lower priority, because we are likely to have to run pilot trials and agree the water savings with Natural England before rolling out any solution more widely. We are therefore not likely to consider these options until after scheme launch, although we are already in early discussion with potential offset property owners for these solutions.

- **Are you talking to local authorities outside Sussex who may face similar issues of no more water available for growth. Is there an LPA network on the case**

Last year, local planning authority colleagues from Crawley BC and Horsham DC held a joint meeting with the authorities in Greater Cambridgeshire, who were exploring the promotion of water neutrality within new developments. There hasn't been any more recent engagement with other local authorities directly, but there is indirect communication through government departments and agencies, including Defra, DLUHC, and Natural England. We have also recently engaged with key stakeholders through the Future Homes Hub forum. We're not aware that there is currently a water neutrality LPA network outside of West Sussex.

- **when do you realistically plan to launch the offsetting scheme and are you currently aware of how many litres you need to offset?**

It is difficult to put an exact date on the scheme launch, as we are just finalising the scope of the project. We will develop a more detailed schedule over the summer. An early initial schedule based on a draft scope suggests a launch date sometime in the first half of 2024. We are taking active steps to speed up the delivery schedule, including seeking additional funding and resources.

Final figures on water requirements will be worked up through the Delivery Plan, but relatively accurate calculations were provided in the [Sussex North Water Neutrality Study: Part C – Mitigation Strategy](#) ('Part C report'). The report states that 5.916 Megalitres per day (Ml/d) would be required in the Local Plan period to 2038/39 using the Building Regs Optional water efficiency standard of 110 litres per person per day (l/p/d), or 4.934 Ml/d using 85 l/p/d, which is the standard in the water neutrality policy that the Sussex North authorities are seeking to implement in their emerging local plans.

Development prioritisation is another matter that is currently being planned. Prioritisation is required because there will not be sufficient offsetting capacity within the scheme to serve all developments at once.

- **Flow restrictors were proposed in the Part C report. How do the local authorities plan on securing lower consumption from this in perpetuity?**

The current trial is in Crawley Homes stock and was funded by Crawley Borough Council. The council therefore have control over this stock. Contractual terms for properties that SNOWS will use for offsetting are yet to be agreed. Measures will be secured through Section 106 agreements at planning.

The 'in perpetuity' point is a live question. We have asked Natural England for their opinion on what 'in perpetuity' means for water neutrality, as it is not expected to be an issue beyond the local plan period. Ultimately however, the local planning authorities need to have sufficient certainty so that they can ensure they are discharging their duties as the competent authority under the Habitats Regulations.

- **How many public sector homes need to be fitted with flow meters to compensate for water usage from each new house built?**

This depends on several factors. First, we need to know the water use of the new house that needs to be offset. Emerging local plan policies will seek for this to be reduced to 85 litres per person per day (l/p/d) in new residential properties. Then, we calculate the occupancy rate of the property with the offsetting measure installed and multiply by the agreed water saving – 27 l/p/d. A typical occupancy rate across the WRZ is 2.5, which means a saving of 67.5 litres per property on average. We therefore require between 1 and 2 properties to offset one new build.

However, after 2025, we will be able to account for Southern Water's contribution to reduce the offset requirement that SNOWS needs to account for. So, we will only need to offset a certain percentage of the 85 l/p/d. We will therefore be able to offset multiple new builds with one offsetting property.

- **Is the offsetting scheme only intended for allocated applications in Horsham district?**

No, SNOWS is accessible to all those planning authorities impacted by the Water Neutrality position statement and those within the Water Resource Zone.

Water neutrality requirements apply for new development anywhere within the WRZ. Properties used to provide offsetting can also be anywhere within the WRZ, except in the Upper Beeding area, which can be supplied from a different source to Hardham and is therefore not suitable for providing mitigation.

- **What will the capacity be for unallocated sites? How might nationalisation change your approaches and timescales?**

This is a level of detail that we don't have available right now. As noted for question 10, development prioritisation is still being planned. The ultimate aim of course is to have capacity within the scheme to serve the entire local plan growth needs of the affected local planning authorities.

We're unclear if nationalisation refers to the water companies, but if so, a change of ownership will not change the factors that are driving the need for water neutrality,



so we would not expect there to be any significant changes to the development of SNOWS before launch.

**Additional comment from Sandra Norval, Southern Water:**

If 'nationalisation' refers to the use of the water neutrality principles outside of Sussex North this would be independent of the existing Position Statement and currently would be a voluntary approach.

- **Are there any measures that Southern Water can implement to restrict water within developments but outside plots to help meet lower consumption?**

We need to be cautious to separate the measures that Southern Water need to do as part of their Water Resource Management Plan, and the very specific requirements on the local planning authorities for new development to demonstrate water neutrality.

## What's next?

The next webinar will be held in September, date and content to be confirmed. Please get in touch with any topic suggestions you would like us to consider for this event and we will do our best to incorporate this. Please send any suggestions to [waterneutrality@southernwater.co.uk](mailto:waterneutrality@southernwater.co.uk)

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

## See you again soon!

