

Water Neutrality Progress Update

JULY 2023



1. Introduction

- 1.1 Submission Crawley Borough Local Plan Policy SDC4 sets out a framework through which the Local Plan, and planning applications, can achieve water neutrality. Its approach is supported by the joint evidence base of the Water Neutrality Strategy (Parts A to C)¹, with work ongoing to establish a Local Authority-led offsetting scheme, the Sussex North Offsetting Water Scheme (referred to as SNOWS).
- 1.2 A Water Neutrality Topic Paper², prepared jointly by Crawley Borough Council, Chichester District Council, and Horsham District Council, supports the Submission Local Plan. It provides an overview of joint working undertaken, shared evidence base and offsetting scheme progress. The Topic Paper also sets out a 'Next Steps & Conclusions' section, detailing further work being undertaken at the time of its May 2023 publication.
- 1.3 The Local Authorities have continued to make progress in planning to address water neutrality through their respective Local Plans. This paper provides an update on work undertaken since publication of the Water Neutrality Topic Paper in May 2023.

2. Local Plan Representations on Water Neutrality

- 2.1 Publication Consultation (under Regulation 19) on the draft Submission Crawley Borough Local Plan closed on 20 June 2023. A total of six representations related to Policy SDC4: Water Neutrality, were submitted by the following organisations: Natural England, Sussex Wildlife Trust, CPRE Sussex, Save West of Ifield Campaign, Persimmon Homes, and Home Builders Federation.
- 2.2 Representations were broadly supportive of the emerging policy approach. Natural England recommended factual modifications to Policy SDC4 and its supporting text to improve its clarity and accuracy. Sussex Wildlife Trust and CPRE Sussex both suggested additional wording relating to the timing of offsetting being in place. The development industry representations proposed textual changes and suggested that further certainty is needed regarding the SNOWS and on viability. Save West of Ifield Campaign feedback related to the approach taken for swimming pools. A summary of the representations, and full verbatim responses, can be viewed separately³.

¹ Water Neutrality Study (July 2021, April 2022, December 2022) JBA Consulting

² Water Neutrality Joint Topic Paper (May 2023) CDC, CBC, HDC:
<https://crawley.gov.uk/sites/default/files/2023-05/9.%20Joint%20Topic%20Paper%20Water%20Neutrality%20May%202023.pdf>

³ The summary of the Representations is in Chapter 5 of the council's Consultation Statement Main Report and the verbatim representations are set out in the Consultation Statement: Appendix 8: Further Publication Consultation Representations

3. PINS Advisory Meeting

- 3.1 An advisory meeting was held with a PINS appointed Planning Inspector on 21 June 2023. This was attended by the Local Authorities, Natural England and the Environment Agency.
- 3.2 A range of matters relating to Policy SDC4 were discussed, with the advisory Inspector specifically referencing:
- a need for the policy to be sufficiently clear to provide certainty for decision makers and applicants as to what is expected.
 - the importance in clearly setting out what types of development the policy would apply to, including for supporting infrastructure where necessary.
 - a need for further detail on the emerging offsetting scheme, including how this will be accessed (whilst recognising that this work is complex and ongoing).

4. Proposed Modifications to Policy SDC4

- 4.1 Having regard to Local Plan Publication Consultation representations received and feedback from the PINS advisory meeting, Crawley Borough Council, Chichester District Council, Horsham District Council, South Downs National Park Authority and West Sussex County Council met to discuss and agree suggested modifications to Policy SDC4 and supporting text.
- 4.2 It has not been considered appropriate to suggest modifications in response to all points raised by Local Plan representations, as some of these, particularly those suggested by the development industry, are likely to merit further discussion at examination. Therefore, the changes put forward focus substantively on points of clarity, particularly those raised by Natural England and environment groups, and in response to matters raised by the Inspector at the PINS advisory meeting.
- 4.3 The amendments proposed by the joint councils to policy wording and supporting text are set out in Crawley Borough Council's *Schedule of suggested Modifications* (July 2023).

5. Statement of Common Ground

- 5.1 A Statement of Common Ground relating to Water Neutrality has been agreed between Crawley Borough Council, Chichester District Council, Horsham District Council, Mid Sussex District Council, South Downs National Park Authority and West Sussex County Council. It has been endorsed by Southern Water, Natural England, and the Environment Agency.
- 5.2 The Statement of Common Ground sets out a commitment by all signatories to ensuring water neutrality is achieved within the Sussex North Water Resource Zone. It covers the joint overall approach to water neutrality, including objectives, governance, evidence, policy, and mitigation. It also sets out a statement of intent with regards to ongoing work, specifically regarding the Local Authority-led offsetting scheme (SNOWS) which is continuing to evolve.

6. SNOWS

- 6.1 The Local Authority-led offsetting scheme, SNOWS, continues to progress.
- 6.2 As discussed in the Water Neutrality Topic Paper, Crawley is undertaking work to install a flow regulator device in its council owned housing stock, creating water saving credits. Other Local Authorities are assessing the scope to undertake similar work to create water savings.

6.3 The SNOWS scheme is discussed under Section 5 of the Topic Paper, and to provide an update on SNOWS progress since publication of the Topic Paper, a SNOWS Project Update is set out in Appendix 1, detailing project progress up to the end of July 2023.

Appendix 1: SNOWS Project Update

Sussex North Offsetting Water Scheme (SNOWS)

Project review – July 2023

For CBC Local Plan submission

Purpose

This brief report has been produced by the Water Neutrality Project Manager to update stakeholders as part of Crawley Borough Council's Local Plan submission on:

1. Current project progress, including deliverables produced to date
2. Review of outstanding project scope to be delivered, including high-level schedule

Current progress

Outline Business Case - complete

The **Outline Business Case** was endorsed by the Chief Executives at the Board meeting on 17 April, the next meeting following the original deadline to produce this by 31 March.

Comms & Engagement Plan – complete

The **Comms & Engagement Plan** was published internally on 6 April, shortly after the original deadline of 31 March. An updated version (v1.2) was published on 17 July.

Comms & Engagement deliverables – ongoing

Several deliverables were published with or after the C&E Plan – the **Comms & Engagement Log**, the **External Stakeholder Contact List**, the **RACI matrix**, and the **SNOWS Standard Presentation**. The **SNOWS project newsletter** is now being finalised. There are still further deliverables to produce.

Risk, issues & opportunity (RIO) management – ongoing

Originally targeted for production by the end of April, the risk register is particularly complex and has therefore taken longer to populate and assess than envisaged. The **Risk, issue & opportunity strategy** was finalised and published on 12 July. The **Risk, issue & opportunity register** has now been fully consulted upon internally. It is now with external project stakeholders (Environment Agency, Natural England and Southern Water) for comments. Comments are expected from them by the end of August, after which it will be approved at our September Executive Board meeting and published.

Monitoring & Reporting – ongoing

The **Monitoring & Reporting Plan** (quality management) was originally targeted for production by the end of April, following an OIG meeting on the topic in early April. Further work has taken longer than anticipated, but the aim is to now have the first draft ready for internal consultation by the end of August. This is an important document that will need to be widely consulted internally and externally (to Natural England and Southern Water at least). Most of the other M&R deliverables are regular reports, so these will be produced later in the project life cycle.

Project scope – complete

The final **SNOWS Project Scope** was published on 15 June. An updated version (v1.1) was published on 14 July. The forecast delivery dates and resources / consultations required will however need to be updated once the detailed delivery schedule has been produced. Further changes to the scope after publication will need to go through the formal change control procedures, which are due to be drafted and sent for internal consultation before the end of August.

Delivery schedule – ongoing

A first draft **SNOWS Schedule** was produced by the Project Manager for initial review purposes only. Now that the scope has been finalised, the Project Manager will work with OIG and others to develop the detailed delivery schedule, ideally by the end of September, although it may take longer to develop. This will give an indication of the forecast scheme launch date. The Project Manager is currently assessing suitable scheduling tools.

Delivery Plan (scheme access protocol only) – ongoing

The **Delivery Plan** is the key document for the project – setting out the processes and deliverables of the scheme's operation. So far, we have produced first drafts of the **Offset properties register**, **SNOWS Access Prioritisation Protocol** (i.e. how scheme access will be managed for applications). The Project Manager has proposed a 'scoring' system for how scheme access will be managed for applications, and the **SNOWS processes** (i.e. scheme operation processes for applications/pre-apps/appeals), and these are being refined through the Offsetting Implementation Group (OIG). There are still further deliverables to produce.

Knowledge & Information Management – ongoing

So far, a first draft of the **SNOWS File Plan** and **Document & Deliverable Register** has been consulted internally. We expect to publish these documents by the end of July. There are still further deliverables to produce.

Outstanding scope to be delivered

Business Case

- Full Business Case – aim for **autumn** production

Comms & engagement

- Internal 'lines to take' – aim for **July/August** production
- Internal/external FAQs – aim for **October** production
- Project brief – aim for **July/August** production
- Housing team workshop – aim to take place in **August**
- Registered Provider webinar (x2) – aim to take place in **September**
- Developer webinar (x2) – aim to take place in **September** and **November**

Monitoring, reporting & quality management

- Lessons learned register – aim for **August**

- WNLOG update report – aim to produce template in **late 2023/early 2024**
- Scheme update reports (incl. & excl. finances) – aim to produce template in **late 2023/early 2024**
- Audit reports (data & financial; offset provision) – aim to produce template in **late 2023/early 2024**

Delivery

- Costs & Funding Plan – aim for **August/September** production
- Delivery Plan – aim for **October** production
- Registers/databases (applications; offset properties; financial) – aim for **September** production
- Internal reporting dashboard – aim for **late 2023/early 2024** production
- Processes – aim for **September** production
- User guides (DM teams; applicants) – aim for **late 2023/early 2024** production
- DM team training webinars – aim to take place **shortly prior to scheme launch**
- Standard documents (scheme access request; non-scheme use notification; appeal notification; completions notification; offset supplier instruction; offset supplier work completion; S106 wording) – aim for **late 2023/early 2024** production

Benefits realisation

- Benefits Realisation Plan – aim for **late 2023/early 2024** production
- Benefits review report – aim to produce template in **late 2023/early 2024**

Procurement

- Procurement Plan – aim for **August** production
- Procurement of legal support – **dependent on funding (high priority)**
- Procurement of offset measure providers – **TBC**
- Legal agreement with offset property providers – **awaiting legal procurement**

Knowledge & information management (KIM)

- KIM Plan – aim for **late 2023** production
- Information risk assessment – aim for **late 2023** production
- Data Protection Impact Assessment [if required] – aim for **late 2023** production

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