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Water Neutrality Statement.

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Application Site : Lordings Road, Newbridge, Billingham, RH14 9JA

Proposal : Limeburner Pub And Caravan Site, Lordings Road, Newbridge, Billingham, RH14 9JA

TABLE OF CONTENT

1	Introduction	1
2	Defining Water Neutrality	3
3	Development Summary and Estimated Water Demand	4
	Occupancy Assumptions.....	4
	Daily Water Demand Estimate	5
	Annual Water Demand	5
4	Water Efficiency Measures.....	7
	Specification of Fixtures and Fittings.....	7
	Construction Method and Leak Prevention.....	8
	Rainwater Harvesting	8
	Smart Metering and Behavioural Awareness.....	8
5	Proposed Offsetting Strategy	9
	Offsetting Requirement.....	9
	Section 106 Mechanism.....	9
	Delivery via SNWCS.....	10
	Offsetting Scope and Priorities	10
6	Conclusion	14
7	Appendices	15
	Appendix A – Example Section 106 Clause (Water Neutrality)	15
	Appendix B – Sussex North Water Certification Scheme (SNWCS)	15
	Appendix C – Water Efficiency Fixtures and Fittings Schedule	16

1 Introduction

This Water Neutrality Statement has been prepared in support of a planning application for the redevelopment of the Limeburner Pub and Caravan Site, located off Lordings Road, Newbridge, Billingshurst, RH14 9JA, within Horsham District.

The site falls within the **Sussex North Water Resource Zone (WRZ)**, an area where groundwater abstraction has been identified by **Natural England** as having a likely significant effect on internationally designated habitats, including the **Arun Valley Special Protection Area (SPA)**, **Special Area of Conservation (SAC)** and **Ramsar site**.

In accordance with **Regulation 77** of the **Conservation of Habitats and Species Regulations 2017 (as amended)**, all developments within the Sussex North WRZ must demonstrate **water neutrality** before planning permission can be granted.

Water neutrality is not currently defined in legislation, but is guided by Natural England's Position Statements and the **Sussex North Water Neutrality Mitigation Strategy (2022–2024)**. It requires that:

“For every new development, total water use in the region after the development must be equal to or less than the total water-use in the region before the new development.”

This Water Neutrality Statement demonstrates how the Limeburners development will achieve water neutrality through:

- A high standard of **on-site water efficiency** (≤ 85 litres/person/day)
- **Rainwater harvesting** for non-potable use
- A financial contribution via **Section 106 agreement** to fund **off-site water-saving measures** within the Sussex North WRZ, in line with **Horsham District Council policy** and the **Sussex North Water Certification Scheme (SNWCS)**

The proposed development consists of **24 factory-built static homes** (14 two-bedroom and 10 three-bedroom), built to **BS 3632 residential standards** and intended for permanent residential use.

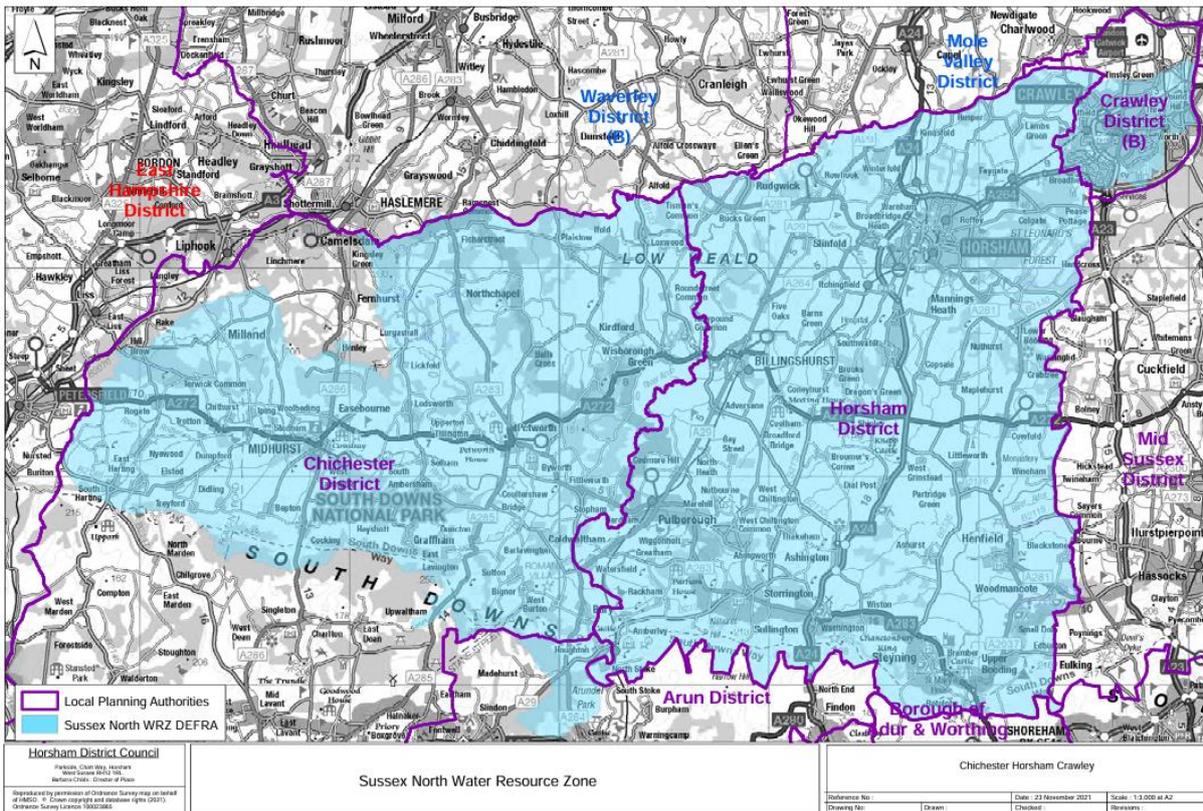


Figure 1. Sussex North Water Resource



Figure 2. Site Map

2 Defining Water Neutrality

Water neutrality is a concept introduced to address the impacts of water abstraction on internationally protected habitats within the **Sussex North Water Resource Zone (WRZ)**. It has become a critical requirement for new development proposals in the region, particularly following advice from **Natural England** issued in September 2021 and updated in subsequent position statements.

Natural England defines water neutrality as:

“For every new development, total water use in the region after the development must be equal to or less than the total water-use in the region before the new development.”

This principle is now embedded in the **planning approach of Horsham District Council**, which requires all applications within the WRZ to demonstrate a **water-neutral strategy** that aligns with **Regulation 77** of the **Conservation of Habitats and Species Regulations 2017 (as amended)**.

- To achieve water neutrality, the following three-step approach is applied:
- **Reduce:** Minimise water demand through the installation of water-efficient fixtures and fittings, low-consumption appliances, and design best practice to meet or exceed a performance standard of **≤ 85 litres/person/day**.
- **Reuse:** Incorporate rainwater harvesting and other water recycling methods to reduce reliance on mains water for non-potable uses (e.g. garden irrigation, toilet flushing).
- **Offset:** Mitigate any residual water demand through off-site measures within the Sussex North WRZ, typically secured via a **Section 106 agreement**. These include retrofitting existing homes, schools, or public buildings with water-saving devices.

In support of this approach, Horsham District Council has introduced the **Sussex North Water Certification Scheme (SNWCS)**, a formal framework to manage, verify, and monitor offsetting contributions for developments of varying scales.

This Water Neutrality Statement follows the above hierarchy and sets out how the Limeburners proposal will comply with water neutrality requirements through an integrated strategy combining on-site efficiency, rainwater reuse, and off-site offsetting contributions.

3 Development Summary and Estimated Water Demand

The proposed development comprises the siting of **24 factory-built static homes**, constructed to **BS 3632 residential standards**, suitable for permanent year-round occupation. The layout includes:

- **14 × 2-bedroom units**, each with 1 shower room
- **10 × 3-bedroom units**, each with 2 shower rooms

The site is located within the **Sussex North Water Resource Zone (WRZ)** and therefore falls under the requirement to demonstrate **water neutrality** in accordance with **Natural England's guidance** and **Horsham District Council planning policy**.

Occupancy Assumptions

To estimate water demand, standard occupancy rates have been used in line with **Horsham District Council** and **Southern Water** guidance:

- **2-bedroom units**: 3 persons
- **3-bedroom units**: 4 persons

This results in a **total site population of 82 persons**:

Unit Type	No. of Units	Occupancy (persons/unit)	Total Persons
2-bedroom units	14	3	42
3-bedroom units	10	4	40
Total	24		82



Daily Water Demand Estimate

The development will target a maximum water use of **85 litres/person/day**, in line with the Natural England position statement and industry best practice. This standard reflects the combined effect of water-efficient fixtures, appliances, and rainwater harvesting.

Category	Persons	Daily Demand (L/p/d)	Total Daily Demand (litres)
2-bed units (14 × 3p)	42	85	3,570
3-bed units (10 × 4p)	40	85	3,400
Total Site Demand	82		6,970 litres/day

Annual Water Demand

The annual potable water demand is calculated as:

$$6,970 \text{ litres/day} \times 365 \text{ days} = 2,544,050 \text{ litres/year} \approx 2,544 \text{ m}^3/\text{year}$$

This total water demand represents the baseline quantity that must be either **reduced on-site, reused via rainwater harvesting, or offset through off-site mitigation** in order to achieve full compliance with the water neutrality requirement under **Regulation 77** of the Habitats Regulations.

4 Water Efficiency Measures

To achieve the target of **≤ 85 litres per person per day**, the Limeburners development will incorporate a comprehensive package of water efficiency measures, aligned with **Building Regulations Part G**, **Natural England’s position statement**, and the standards promoted through the **Sussex North Water Certification Scheme (SNWCS)**.

These measures will be embedded in the design, specification, and delivery of each of the 24 factory-built static homes.

Specification of Fixtures and Fittings

Each dwelling will include water-saving fixtures and appliances, selected to ensure high performance and minimal potable water use:

Water Fixture	Specification / Flow Rate
Showers	≤ 8 litres per minute
Kitchen taps	≤ 5 litres per minute
Basin taps	≤ 4 litres per minute
Toilets	Dual flush (4 / 2 litres)
Washing machines*	A-rated efficiency or better
Dishwashers*	A-rated efficiency or better
Rainwater harvesting	≥ 100 litres per unit (non-potable use)

Where installed as part of the home package.

These standards are consistent with those referenced in best practice guidance from Waterwise, the Building Regulations (Part G), and the Code for Sustainable Homes.

Construction Method and Leak Prevention

All homes will be **factory-built** under controlled conditions to **BS 3632**, allowing for precision installation and robust quality assurance. This method significantly reduces the likelihood of:

- Plumbing installation defects
- Leakage from pipework or fittings
- Poor performance from inefficient systems

Furthermore, all units will be tested for leaks and performance prior to delivery to site, ensuring compliance with design standards before occupation.

Rainwater Harvesting

Each unit will be equipped with a **minimum 100-litre rainwater harvesting tank** for use in:

- Garden and landscape irrigation
- External washing and other non-potable outdoor applications

This reduces the demand for mains water, particularly during dry periods and peak usage seasons, and contributes to the overall reduction in potable water consumption across the site.

Smart Metering and Behavioural Awareness

To support long-term water conservation, **smart water meters** will be installed in all dwellings. These meters enable:

- Real-time monitoring of consumption
- Leak detection and early alerts
- Increased awareness of water use among residents

Tenants and homeowners will be provided with **information packs** at handover, detailing the water-saving features of their homes and offering practical advice to reduce consumption through behavioural change.

5 Proposed Offsetting Strategy

While the proposed Limeburners development integrates a full suite of **on-site water efficiency measures** and **rainwater harvesting systems**, a residual potable water demand will remain. To fully achieve **water neutrality**, this remaining demand must be **offset through off-site mitigation** within the **Sussex North Water Resource Zone (WRZ)**.

This approach is supported by **Natural England's Position Statement (2022)** and the **Horsham District Council Water Neutrality Guidance**, which confirm that residual water use can be mitigated through a **financial contribution** secured by a **Section 106 planning obligation**.

Offsetting Requirement

The calculated water demand for the proposed development is approximately:

- **6,970 litres per day**
- **2,544 m³ per year**

This figure represents the **gross demand** generated by full occupancy, after on-site efficiencies but before accounting for any offsetting.

While rainwater harvesting and smart metering will reduce overall mains water demand, **to ensure certainty** and compliance with the precautionary principle under the **Habitats Regulations**, the applicant will mitigate the **full annual demand** through a **S106-based financial contribution**.

Section 106 Mechanism

The offsetting strategy will be secured via a **Section 106 legal agreement** with Horsham District Council. This agreement will:

- **Bind the contribution to the development**
- Ensure funds are allocated specifically to **water-saving retrofit works**
- Support delivery via the **Council's retrofit programme** or approved partners
- Require **written confirmation** from the Council that mitigation is secured prior to occupation

Draft Clause (for reference):

“The Owner covenants with the Council that prior to the first occupation of any dwelling on the Development, the Owner shall pay the Water Neutrality Contribution towards the Council's Water Neutrality Scheme.”

“The Water Neutrality Contribution shall be calculated based on the anticipated water use of the Development and shall be used to fund off-site water efficiency measures, including but not limited to the retrofitting of water-saving fixtures and fittings in existing residential and community buildings within the Sussex North Water Resource Zone.”

Delivery via SNWCS

The **Sussex North Water Certification Scheme (SNWCS)**, introduced in **July 2025**, provides a coordinated framework for small-to-medium-scale developments to achieve water neutrality through:

- Verified contribution levels based on demand
- Approved delivery partners for retrofit works
- Long-term monitoring and assurance
- Reduction in duplication and inconsistency between applications

This development intends to **opt into the SNWCS** to ensure transparent, cost-effective delivery of offsetting within the local WRZ.

Offsetting Scope and Priorities

Funds will be used to retrofit existing buildings in the Sussex North WRZ, prioritising:

- Council-owned or housing association stock
- Schools, care homes, and other community facilities
- High-consumption private dwellings identified via the Water Neutrality Delivery Programme

Typical retrofit works include:

- Installation of low-flow taps and showerheads
- Replacement of older WCs with dual-flush models
- Leak detection and repair
- Installation of water meters in unmetered properties

The cumulative savings from these measures will match or exceed the annual offset requirement of **2,544 m³**, ensuring **no net increase in regional water abstraction** as a result of this development.

Additional Public Benefit

The development also contributes positively to Horsham's local housing need, by delivering smaller, energy-efficient homes in a format suitable for a wide range of occupiers. The homes are built to BS 3632, making them compliant for permanent residential use.

While the 2-bedroom units are 35 sqm and the 3-bedroom units are 70 sqm, these sizes reflect standard modular housing formats constrained by transport regulations. Despite the compact footprint, the homes offer high-quality, well-designed internal layouts with private amenity space and access to shared green areas.

These benefits support the wider delivery of affordable homes, reduce reliance on temporary accommodation, and offer opportunities for the Council or Registered Providers to lease or nominate tenancies for local households.

Monitoring and Delivery

The Section 106 agreement will include provisions for:

- Reporting on the implementation and effectiveness of retrofit measures
- Allocation of funds to water-saving projects identified by the Council
- Confirmation of water neutrality prior to occupation, through certification or condition discharge

These measures ensure compliance with **Regulation 77** and secure mitigation in line with the precautionary principle under the Habitats Regulations.



Figure 3. Proposed Development



Figure 4. Proposed development

6 Conclusion

This Water Neutrality Statement demonstrates that the proposed redevelopment of the **Limeburners Pub and Caravan Site** at **RH14 9JA** has been designed and planned in full accordance with the requirements of **Regulation 77 of the Conservation of Habitats and Species Regulations 2017 (as amended)**, **Natural England guidance**, and **Horsham District Council policy**.

The site lies within the **Sussex North Water Resource Zone**, where groundwater abstraction is having a likely significant effect on the Arun Valley's internationally protected habitats. As such, the development must not result in a net increase in potable water demand.

To achieve this, the strategy for the Limeburners scheme adopts the established three-step hierarchy:

- **Reduction** of water demand through efficient design and specification of ultra-low flow fixtures, dual-flush WCs, and A-rated appliances, achieving a consumption target of **≤ 85 litres/person/day**.
- **Reuse** of rainwater via dedicated harvesting tanks at each unit, reducing non-potable demand for garden and landscape irrigation.
- **Offsetting** of the residual annual water demand (**2,544 m³/year**) through a **financial contribution secured via a Section 106 agreement**, aligned with the **Sussex North Water Certification Scheme (SNWCS)**.

Together, these measures provide a **clear, measurable, and enforceable route to water neutrality**. The strategy ensures that the development will not place additional pressure on local water resources and will not undermine the integrity of protected European sites.

By embedding sustainability into the scheme's design and delivery, the proposal supports the principles of responsible development and complies fully with both national and local planning requirements.

7 Appendices

Appendix A – Example Section 106 Clause (Water Neutrality)

“Draft Clause for Inclusion in Legal Agreement:

“The Owner covenants with the Council that prior to the first occupation of any dwelling on the Development, the Owner shall pay the Water Neutrality Contribution towards the Council's Water Neutrality Scheme.”

“The Water Neutrality Contribution shall be calculated based on the anticipated water use of the Development and shall be used to fund off-site water efficiency measures, including but not limited to the retrofitting of water-saving fixtures and fittings in existing residential and community buildings within the Sussex North Water Resource Zone.”

“No occupation of the dwellings shall occur until the Council confirms in writing that the contribution has been paid and that appropriate mitigation measures are secured.”

This clause is subject to review and agreement by Horsham District Council and their legal representatives.

Appendix B – Sussex North Water Certification Scheme (SNWCS)

The **Sussex North Water Certification Scheme (SNWCS)**, launched in **July 2025**, is a partnership-led initiative between local authorities, **Natural England**, and **Southern Water**, designed to ensure consistent, evidence-based water neutrality across the WRZ.

The scheme includes:

- A centralised **contribution fund** for water-saving retrofits
- Verified **water efficiency standards** for new builds (≤ 85 L/p/d)
- **Monitoring and reporting protocols** to demonstrate long-term neutrality
- Reduced duplication across applications of a similar scale

By participating in this scheme, applicants benefit from streamlined approval, clear mitigation pathways, and alignment with emerging policy expectations.

Appendix C – Water Efficiency Fixtures and Fittings Schedule

The table below summarises the proposed water efficiency specifications for all dwellings:

Water Fixture / Feature	Specification
Toilets	Dual-flush, 4 / 2 litres per flush
Basin taps	≤ 4 litres per minute
Kitchen taps	≤ 5 litres per minute
Showers	≤ 8 litres per minute
Washing machines (if installed)	A-rated or better (efficiency)
Dishwashers (if installed)	A-rated or better (efficiency)
Rainwater harvesting	≥ 100-litre capacity tank per dwelling
Smart water meters	Real-time monitoring, leak detection

All products will be selected to meet or exceed the above flow rate and volume specifications, ensuring consistent compliance with the ≤ 85 L/p/d water use target set by Natural England and SNWCS.