

## Technical Note 1: Water Neutrality Statement

Site: Lower Perryland Farm  
Prepared by: Laura Jagiela  
Approved by: Phil Allen MCIWEM C.WEM  
Date: 5th August 2025

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### 1.0 Introduction

- 1.1 This Water Neutrality Statement (WNS) has been prepared on behalf of Church Barn Group to demonstrate how the proposed development at Lower Perryland Farm will achieve water neutrality.
- 1.2 Following the issue of Natural England's (NE's) Position Statement on Water Neutrality within the Sussex North Water Supply Zone (SNWSZ) it is understood that Horsham District Council (HDC) require all new and reserved matter planning applications to demonstrate that the development is water neutral and/or that they do not result in a significant effect. NE's Position Statement can be found in full within **Appendix A**.
- 1.3 The SNWSZ covers part of the Horsham District, as well as parts of the neighbouring Chichester, Arun and Crawley Districts. A plan showing the supply area can be found in **Appendix B**.
- 1.4 This statement sets out the following:
  - ▶ Baseline calculations for the existing development;
  - ▶ Additional demand as a result of the proposed development;
  - ▶ Water reduction measures, such as water efficient fixtures and fittings and rainwater harvesting; and
  - ▶ Measures to offset any remaining deficit following the above.

### 2.0 Background

- 2.1 The site is located to the west of the A24, just south of Dial Post (RH13 8NT).
- 2.2 The site currently consists of a working farm with a number of buildings.
- 2.3 The proposal is for the construction of three four-bedroom units. A copy of the proposed site plans can be seen in **Appendix C**.

### 3.0 Baseline Calculations

- 3.1 The site is currently a working farm and the most recent water bill is available (**Appendix D**). This shows that the site has an average water usage of 681 litres per day.
- 3.2 The farm use will not remain following the conversion of the buildings, therefore there is 681 litres per day spare capacity for the proposed development.

### 4.0 Additional Demand

- 4.1 The proposal is for the construction of three four-bedroom units.
- 4.2 The occupancy levels for the development have been drawn from local census data (as recommended by HDC in their water neutrality methodology guidance) and this is summarised in Table 4.1, on the next page.

One-bedroom	Two-bedroom	Three-bedroom	Four-bedroom
1.32	1.88	2.47	2.86

**Table 4.1 – Average district occupancy levels per dwelling size**

- 4.3 Using the above census data and the housing mix defined above, the population of the proposed development is estimated to be 8.58 persons.
- 4.4 It is proposed that the new dwellings will achieve a water efficiency of less than 110 litres per person per day of water, which will be in accordance with the optional water efficiency target set out in Building Regulations Part G. This will be achieved through the use of water efficient fixtures and fittings.
- 4.5 A water calculation in accordance with Buildings Regulations Part G has been carried out and confirms that the proposed dwellings can achieve a mains water consumption of 84.45 litres per person per day, which includes an allowance of 5 litres per person per day for external water usage. A copy of the Part G calculation can be found in **Appendix E** and is summarised in Table 4.2, below.

	Total Water Usage (l/p/day)
WC (full flush)	5.84
WC (part flush)	5.92
Taps (Excluding Kitchen)	5.85
Shower	26.22
Bath	14.30
Kitchen Taps	12.12
Washing Machine	13.50
Dishwasher	3.56
<b>Total</b>	<b>87.31</b>
Normalisation Factor	0.91
<b>Total</b>	<b>79.45</b>
External Water Use	5.00
<b>Total</b>	<b>84.45</b>

**Table 4.2 – Proposed Part G Calculation**

- 4.6 A copy of the proposed fixtures and fittings required to achieve the above water consumption can be found in **Appendix F**.
- 4.7 Using the Part G water consumption figure of 84.45 litres per person per day and the proposed population of 8.58, it is estimated that the total water usage per day for the development is 724.62 litres per day.
- 4.8 The sites baseline water usage was 681 litres per day, following the conversion of the buildings the sites proposed water usage will be 724.62 litres per day. This results in a net increase of 43.62 litres per day for the site as a whole.
- 4.9 At this stage, the proposed development cannot be considered to be water neutral and further offsetting measures should be considered.

## 5.0 Offsetting Measures

- 5.1 To ensure the development can demonstrate water neutrality in accordance with the NE Position Statement 43.62 litres per day will need to be offset.

### Offsetting Scheme at The South Lodge Hotel

- 5.2 The client is proposing to offset the development against an offsetting scheme at The South Lodge Hotel, Brighton Road, Lower Beeding, Horsham, RH13 6PS. The details of the mains water offsetting scheme at The South Lodge Hotel as it currently stands is summarised below.
- 5.3 The site is a luxury hotel and spa with water currently supplied from three mains supplies, the Main Hotel Area (Meter Number: 11M50090), The Spa Area (Meter Number: 17MS000318) and the Gatehouse Area (Meter Number: 11AC001166).

Start Date	22/08/2022
End Date	16/08/2023
Start Sub-Meter Read	163,810
End Sub-Meter Read	179,340
Total Days	359
Total Water Consumption (m <sup>3</sup> )	15,530
Total Water Consumption (litres)	15,530,000
Water Consumption (litres per day)	43,259

**Table 5.1: Existing Water Use at The South Lodge Hotel from Southern Water Meter 11M50090**

Start Date	22/08/2022
End Date	16/08/2023
Start Sub-Meter Read	5,920
End Sub-Meter Read	8,572
Total Days	359
Total Water Consumption (m <sup>3</sup> )	2,652
Total Water Consumption (litres)	2,652,000
Water Consumption (litres per day)	7,387

**Table 5.2: Existing Water Use at The South Lodge Hotel from Southern Water Meter 17MS000318**

Start Date	13/06/2022
End Date	16/08/2023
Start Sub-Meter Read	9,184
End Sub-Meter Read	10,054
Total Days	429
Total Water Consumption (m <sup>3</sup> )	870
Total Water Consumption (litres)	870,000
Water Consumption (litres per day)	2,028

**Table 5.3: Existing Water Use at The South Lodge Hotel from Southern Water Meter 11AC001166**

- 5.4 Overall, The South Lodge Hotel has an existing water usage of 43,259 litres per day at the Main Hotel Area, 7,387 litres per day at The Spa Area and 2,028 litres per day at the Gatehouse Area. This gives a total water consumption across the site of 52,674 litres per day, equivalent to 52,674 water credits.
- 5.5 The metered water supply at the Main Hotel Area provides water for the following:
- ▶ Staff and guest toilet and washing facilities
  - ▶ Cleaning and laundry
  - ▶ Kitchens and bars
  - ▶ Garden irrigation
- 5.6 The metered water supply at The Spa Area provides water for the following:
- ▶ Staff and guest toilet and washing facilities
  - ▶ Cleaning
  - ▶ Pools and spas
  - ▶ Kitchen
  - ▶ Garden irrigation
- 5.7 The metered water supply at The Gatehouse Area provides water for the following:
- ▶ Staff toilet and washing facilities
  - ▶ Cleaning and laundry
  - ▶ Kitchens
  - ▶ Garden irrigation
- 5.8 Two boreholes were drilled on site between the 11<sup>th</sup> and 22<sup>nd</sup> April 2024. They were both drilled to a depth of 62m and into the Upper Tunbridge Wells Sand Formation. They have been labelled BH1 and BH2 for all reports.
- 5.9 BH1 has been tested and can achieve an average rate of 20.8m<sup>3</sup>/day, 20,800 litres per day. A EA licence has been applied for but at this stage BH1 has only been tested for the purposed of an unlicensed supply (<20m<sup>3</sup>). It is proposed to abstract 19.999m<sup>3</sup>/day, 19,999 litres per day.
- 5.10 At this stage BH2 has not been yield tested as it is not required for Stage 1. Testing of BH2 will take place during the EA abstraction licence application process. It is not needed to provide the 19.999 m<sup>3</sup>/day for the Stage 1 of the offsetting scheme.

- 5.11 Stage 1 of the offsetting scheme will provide 19.999m<sup>3</sup>/day for potable use within the Main Hotel Area. This will reduce the demand with the SNWSZ. A batch meter will ensure the BH1 Will not abstract more than the limit of an unlicensed supply.
- 5.12 BH1 is not currently up to potable water standard and therefore, the offsetting scheme will install a new treatment plant so that it can provide a potable supply. This will include:
- ▶ Removing the existing storage tank and redundant structures;
  - ▶ Installation of appropriate potable water aeration & storage tanks, pumps, filtration, and treatment systems in a self-contained ISO container;
  - ▶ Water treatment design and quality testing to WHO standards and/or the standards set by the local authority's Environmental Health Officer (EHO);
  - ▶ Water quality testing and Environmental Health Officer (EHO) approval;
  - ▶ Connection of the treated water supply from the new storage tank to the Main Hotel Area supply using the existing distribution pipe, and;
  - ▶ Installation of a new telematics system to remotely monitor the borehole and record the amount of water supplied 24/7.
- 5.13 The main water supply will continue to provide water to the Main Hotel Area for the demand above the 19.999m<sup>3</sup>/day. This will be done via an air separated feed (to comply with water regulations and ensure no water is fed back into the mains supply network) into the new storage tank. The main water supply will only kick in when the water levels in the storage tank drop below a certain point and the 19.999m<sup>3</sup>/day has been abstracted from BH1.

### Offsetting of the Proposed Development

- 5.14 The borehole abstraction at The South Lodge Hotel, during stage 1, is making 19,999 litres per day available or offsetting mains water demand, which equates to 19,999 credits.
- 5.15 As stated in Section 4 of this WNS, the proposed development will have a total water demand of 43.62 litres per day and therefore require a minimum of 44 credits for the development to be water neutral.
- 5.16 A copy of the purchase agreement can be found in **Appendix G**.

## 6.0 Summary and Conclusions

- 6.1 This Technical Note sets out the water usage strategy for the proposed development at Lower Perryland Farm, Dial Post, RH13 8NT.
- 6.2 The proposal is to incorporate water efficient fixtures and fittings to the proposed development to reduce the mains water consumption.
- 6.3 The proposed development at Lower Perryland Farm will purchase and be allocated 263 credits as part of the significant mains water offsetting scheme at The South Lodge Hotel. Therefore, the residual mains water requirement of the development of 43.62 litres per day has been fully offset and there is no additional mains water requirement within the SNWSZ as a result of the development.
- 6.4 This strategy will ensure that the new development will have a neutral impact on the SNWSZ. The Water Usage Strategy confirms the proposal will be water neutral once complete and therefore satisfies Natural England's requirements.

## **Appendix A**

### Natural England's Position Statement



## **Natural England's Position Statement for Applications within the Sussex North Water Supply Zone**

### **September 2021 – Interim Approach**

Please take the following as Natural England's substantive advice for all applications which fall within Sussex North's Water Supply Zone.

#### **Sussex North Water Supply Zone**

##### **Arun Valley SPA, SAC and Ramsar Site- Sussex North Water Supply Zone**

The Sussex North Water Supply Zone includes supplies from a groundwater abstraction which cannot, with certainty, conclude no adverse effect on the integrity of;

- Arun Valley Special Area Conservation (SAC)
- Arun Valley Special Protection Area (SPA)
- Arun Valley Ramsar Site.

As it cannot be concluded that the existing abstraction within Sussex North Water Supply Zone is not having an impact on the Arun Valley site, we advise that developments within this zone must not add to this impact. This is required by recent caselaw, [Case C-323/17 People over wind and Sweetman. Ruling of CJEU](#) (often referred to as sweetman II) and Coöperatie Mobilisation for the Environment and Vereniging Leefmilieu Case C-293/17 (often referred to as the Dutch Nitrogen cases).

Between them these cases require Plans and Projects affecting sites where an existing adverse effect is known (i.e. the site is failing its conservation objectives), to demonstrate certainty that they will not contribute further to the existing adverse effect or go through to the latter stages of the Regulations (no alternatives IROPI etc).

Developments within Sussex North must therefore must not add to this impact and one way of achieving this is to demonstrate water neutrality.

In addition, the Gatwick Sub regional Water Cycle Study concluded that water neutrality is required for Sussex North to enable sufficient water to be available to the region.

The definition of water neutrality is the use of water in the supply area before the development is the same or lower after the development is in place.

## Strategic approach

Natural England has advised that this matter should be resolved in partnership through Local Plans across the affected authorities, where policy and assessment can be agreed and secured to ensure water use is offset for all new developments within Sussex North. To achieve this Natural England is working in partnership with all the relevant authorities to secure water neutrality collectively through a water neutrality strategy.

Whilst the strategy is evolving, Natural England advises that decisions on planning applications should await its completion. However, if there are applications which a planning authority deems critical to proceed in the absence of the strategy, then Natural England advises that any application needs to demonstrate water neutrality. We have provided the following agreed interim approach for demonstrating water neutrality;

### **Minimising water use of new builds.**

- Complete a water budget (based on occupancy)
- All new builds to demonstrate that they can achieve strict water targets (e.g., 85L/pp/day\*)

This can be achieved by measures such as:

- Grey water recycling (advantage of being reliable in hot dry weather);
- Rainwater harvesting;
- Water efficient fixings (such as shower aerators) to demonstrably reduce demand-this would need to be suitably certain.

### **In addition, water offsetting is required**

- One way to achieve this is retrofitting of council owned properties/commercial buildings-located within Sussex North. Examples include:
  - Grey water recycling- (for example there are clear opportunities for commercial properties).
  - Rainwater harvesting of commercial settings;
  - Installation of water reduction fittings in Council-owned buildings.

These measures need to be implemented until such time as a more sustainable water supply has been secured.

It will also need to be ensured that measures are not already proposed (for example in Southern Water's Management Plan) to avoid double-counting.

Any mitigation must be suitably certain in order to comply with the Habitats Regulations and Caselaw.

If the application cannot demonstrate, through an appropriate assessment, the required water neutrality, we advise that it is either revised to achieve this in line with the above or awaits completion of the strategic approach.

The securing of water neutrality is a matter which needs to be resolved at a strategic level and Natural England is working with the relevant authorities and the water company to achieve this. In light of this, Natural England will not be engaging with individual planning applications whilst the strategy is evolving.

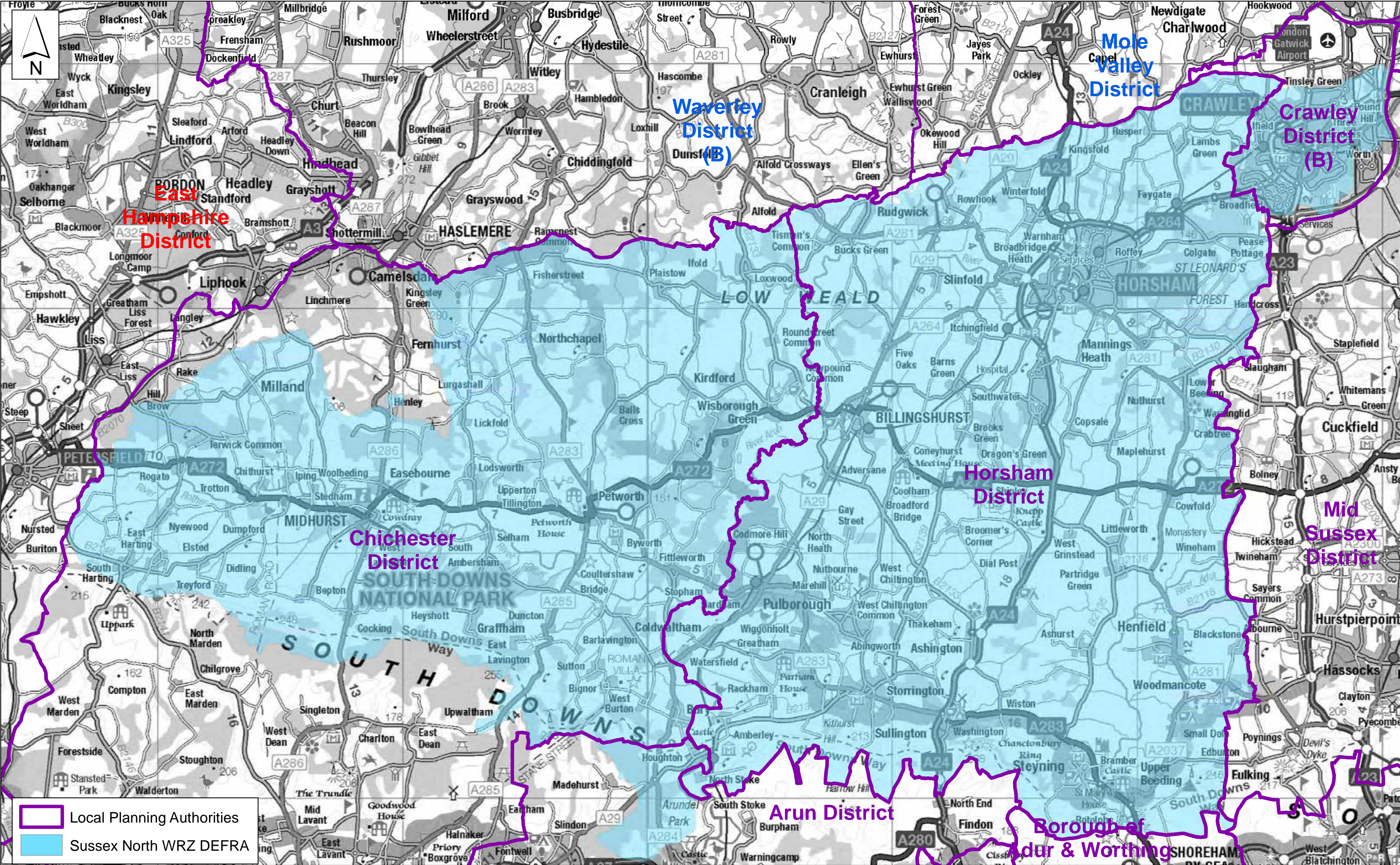
**\*This this is the reasonably achievable figure with the above measures based on the early data from the strategic solution and may be subject to change as the strategic solution evolves.**



## **Appendix B**

Sussex North Water Supply Zone Map





Local Planning Authorities  
 Sussex North WRZ DEFRA

**Horsham District Council**

Parkside, Chart Way, Horsham  
West Sussex RH12 1RL  
Barbara Childs : Director of Place

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Sussex North Water Resource Zone

Chichester Horsham Crawley			
Reference No :		Date : 23 November 2021	Scale : 1:3,000 at A2
Drawing No:	Drawn :	Checked :	Revisions :



## **Appendix C**

Proposed Site Plans



Revisions			
No.	Description	Date	By
3	Revised Plans	02-07-2025	
2	Revised Plans	05-06-2025	
1	PLANNING	27-05-2025	

Notes:

GENERAL NOTES:

All dimensions & levels are preliminary and approximate and subject to utilities search, legal boundaries and detailed layouts/ design development through consultation.

Dimensions are to be checked on site by contractor & sub contractors prior to commencement of work, any discrepancies are to be highlighted immediately to the architects.

Scale 1 to 500

0 5 10 25 M

Scale: 1 : 500 @ A3

Project No. 504 Project Name: Perrylands,Dial Post

N

Drawing Name:  
**Proposed Site Block Plan**

Drawing No.	Revision:	Suitability Description:
<b>P016</b>	<b>P3</b>	<b>PLANNING</b>
Drawn: MS	Checked: GF	Orig Paper Size: A3

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Use figured dimensions only. All levels and dimensions to be checked. This drawing is to be read in conjunction with all other relevant drawings and specifications.  
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## Appendix D

Water Bill



## Appendix E

Part G Calculation: Proposed

Proposed Part G - Water Usage

Fixture	Capacity/Flow Rate	Use Factor	Fixed Use	litres/person/day
WC (Single Flush)		4.42		0.00
WC (Dual Flush)	4	1.46		5.84
WC (Dual Flush) Part	2	2.96		5.92
Taps (excluding kitchen)	2.7	1.58	1.58	5.85
Bath (where shower present)	130	0.11		14.30
Shower (where bath present)	6	4.37		26.22
Bath Only		0.5		0.00
Shower Only		5.6		0.00
Kitchen Sink	4	0.44	10.36	12.12
Washing Machine	6.43	2.1		13.50
Dishwasher	0.99	3.6		3.56
Total calculated use (litres/person/day)				87.31
Normalisation Factor				0.91
Total Water Consumption (CSH) (litres/person/day)				79.45
External Water Use				5.00
Total Water Consumption (Part G) (litres/person/day)				84.45

	Number of Units	Census	Population	Total Water Usage
Four-bedroom Dwelling	3	2.86	8.58	724.62
Totals	3		8.58	724.62





## **Appendix F**

### Fixtures and Fittings Specifications

## Fixtures and Fittings - Part G Specifications

Item	Capacity/Flow rate	Overview
Toilet (Dual Flush)	4/2 litres	
Basin Tap	2.7 litres/minute	
Bath	130 litres	
Shower	6 litres/minute	

Kitchen Sink	4 litres/minute	<p>Tap with flow regulator - Affinity by Moores</p> <div data-bbox="643 264 989 772">  <p><b>Utility</b></p> <p>Chrome utility lever sink mixer tap</p> <p>Tap Height: 380mm Order code: 805 56</p> </div> <p>Flow Regulator:</p> <div data-bbox="643 880 1410 1314">  <ul style="list-style-type: none"> <li>• Tap tail type flow limiters are suitable for most British basin, pillar taps, basin and sink mixers.</li> <li>• Operating pressure range – Min. 1.0 bar Max. 5.0 bar.</li> <li>• All flow limiters accurate +/- 10%.</li> <li>• Flow limiting flow straighteners aerates the water for a softer non-splashing flow.</li> <li>• Flow limiting flow straighteners can be easily retro fitted in tap spout (dependent on tap/mixer model).</li> </ul> <table border="1"> <thead> <tr> <th>Colour</th><th>Flow Rate limited to:</th><th>Order Code</th></tr> </thead> <tbody> <tr> <td>White</td><td>1 litre per minute</td><td>805 57</td></tr> <tr> <td>Blue</td><td>2 litres per minute</td><td>805 58</td></tr> <tr> <td>Brown</td><td>3 litres per minute</td><td>805 59</td></tr> <tr> <td>Green</td><td>4 litres per minute</td><td>805 40</td></tr> <tr> <td>Yellow</td><td>5 litres per minute</td><td>805 41</td></tr> <tr> <td>Black</td><td>6 litres per minute</td><td>805 42</td></tr> </tbody> </table> </div>	Colour	Flow Rate limited to:	Order Code	White	1 litre per minute	805 57	Blue	2 litres per minute	805 58	Brown	3 litres per minute	805 59	Green	4 litres per minute	805 40	Yellow	5 litres per minute	805 41	Black	6 litres per minute	805 42
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Black	6 litres per minute	805 42																					

## **Appendix G**

Nicholls Purchase Agreement

FAO: Mr Mike Jones  
Church Barn Group  
Church House  
The Street  
Washington  
RH20 4AS

Date: 23<sup>rd</sup> May 2025  
Ref: KW/DialPost/002

Dear Mike,

**Re: Purchase of Water Credits for Dial Post site – Revised scheme**


Many thanks for accepting our quotation as issued on the 20/05/2025 via email and copied below for completion.

Cost Per Credit	No. of Credits Required	Total Cost	Reservation Fee
£75	263	£19,725 +VAT	£6,903.75

The water credit basic terms of supply (STC) are below:

1. Each credit is equivalent to 1 litre per day rounded up
2. The cost per credit is £75 plus vat
3. A 35% reservation fee plus vat is payable on execution of the contract to secure the credits
4. The balance is due once planning consent is granted and the s106 obligating the offsetting landowner is signed
5. If the offsetting measures are not accepted by either NE or LPA in determining the application, then the reservation fee is refundable less reasonable costs
6. The reservation fee isn't refundable otherwise, but the credits are assignable so either we or you could resell them or you could transfer them to your Washington or another scheme once the balance has been paid.
7. We will provide a detailed report on the offsetting measures to be included in the Water Neutrality Statement prepared by your water neutrality consultant and work with you through the planning application process
8. We have used 80.5 l/p/d should a higher (or lower) consumption rate be used the number of credits and cost will vary.
9. We will assist with drafting of you s106 where this relates to obligations on our client landowner and provided any further reports it mandates.
10. This quote must not be used to form part of a planning application, and no consent is given for its use external to the quoted party

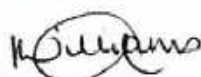
Following your agreement of the above proposal, we now require you to provide the following information in order to proceed to contract.

1	Full Development Site Address (if no formal address exists then a full description of the land that ties up with the Title Register)			
LOWER PERROTUMAS FARM DIALPOST WEST SUSSEX BN11 3NT.				
2	Site Legals - Title Register(s) & Title Plan(s)			
3	Site Plan (with the land that will be subject to the planning application edged in red)			
4	Developer Details (for LTD's and LLP's)			
a.	Developer Company Name	LOWER PERROTUMAS FARMS LTD.		
b.	Registered Office Address	CHURCH HOUSE THE STREET WASHINGTON BN20 4AS		
c.	Company Number	15013865		
d.	Trading Address (if different)	AS ABOVE		
e.	Main Contact Name	MUNE JONES		
f.	Main Contact Email	MUNE@CHURCHBARN.CO.UK		
g.	Main Contact Telephone	07802 449321		
h.	Authorised signatories <small>(please let us know if two or more are required) - must be a Director</small>			
5	If you are a landowner developing your own site then all landowners will be required to sign (unless otherwise agreed). For each landowner:			
Full Name		Full Name		
Address		Address		
Email Address		Email Address		
6	Invoicing Details			
Address		AS ABOVE		
Email Address (for invoicing)		AS ABOVE		
Telephone #		AS ABOVE		

Please complete the above information and send to [katie.williams@Nichollswatercredits.co.uk](mailto:katie.williams@Nichollswatercredits.co.uk).

Once these details have been received, we can arrange for your contract to be drafted promptly.

Yours Sincerely,



Katie Williams  
Water Credits Project Manager