TN01: Water Neutrality Statement

Site: Land East of Mousdell Close, Ashington, RH20 3GS
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Approved by: Laura Jagiela
Date: 12th August 2025

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1.0 Introduction

1.1 Rocco Homes (Cobham) have asked Motion to carry out a review of the water demands of their proposed development at the Land East of Mousdell Close, Ashington. This is to understand what the offsetting requirements will be to ensure that it can be made water neutral within the Sussex North Water Supply Zone (SNWSZ).

1.2 The proposed development is for 74no. residential units, comprising of 14no. one-bed units, 18no. two-bed units, 29no. three-bed units and 13no. four-bed units.

1.3 Following the issue of Natural England's (NE's) Position Statement on Water Neutrality within the Sussex North Water Supply Zone (SNWSZ), all new, reserved matters, conditions discharge and Section 73 planning applications within the SNWSZ must demonstrate that the development can be water neutral. The SNWSZ covers part of Horsham, as well as parts of the neighbouring Chichester, Arun and Crawley Districts. A plan showing the supply area can be found in **Appendix A** and NE's Position Statement can be found in full within **Appendix B**.

1.4 As the site falls within the SNWSZ boundary, Horsham District Council (HDC) as the Local Planning Authority (LPA) will want to know whether the proposed development represents a change in water consumption and, if so, that the proposed development can be water neutral.

1.5 Therefore, to satisfy NE's and HDC's requirements on water neutrality, this WNS will set out the following:

- The baseline, existing water demand for the development site;
- Whether there will be a change in water demand as a result of the proposed development;
- What water demand reduction measures, such as the fitting of water efficient fixtures and fittings, will be used;
- Whether the proposed development will be water neutral, and;
- Whether any further offsetting measures to meet proposed water demand are required.

2.0 Site Information

2.1 The proposed development site is located at Land East of Mousdell Close, Ashington, RH20 3GS with proposed access along Rectory Lane.

2.2 The existing site currently consists of approximately 15.43 hectares empty field, which has no existing water use. The existing land registry underlay can be found in **Appendix C**.

2.3 It is proposed to construct a total of 74no. units, comprising of 14no. one-bed units, 18no. two-bed units, 29no. three-bed units and 13no. four-bed units. A copy of the proposed plans can be found in **Appendix D**.

3.0 Existing Water Demand

3.1 The existing site does not have any water use associated with it. Therefore, no baseline data will be taken forward in the water neutrality calculations.

4.0 Future Water Demand

4.1 The proposed development is for 74no. residential units. The schedule of accommodation can be seen in full on the proposed plans in **Appendix D**. The proposed housing mix is as per Table 4.1 below.

Table 4.1 – Development Housing Mix

Flats			
Bedrooms	**No. of Units**	**Census-Based**	**Development**
One-Bed	14	1.32	18.48
Two-Bed	8	1.88	15.04
Total	**22**	**N/A**	**33.52**
Houses			
Bedrooms	**No. of Units**	**Census-Based**	**Development**
Two-Bed	10	1.88	18.80
Three-Bed	29	2.47	71.63
Four-Bed	13	2.86	37.18
Total	**52**	**N/A**	**127.61**
Overall Total	**74**	**N/A**	**161.13**

4.2 Therefore, the proposed development for 74no. units has a total census-based population of 161.13 persons.

4.3 A water calculation in accordance with Buildings Regulations Part G has been carried out and confirms that the proposed development will achieve a water consumption of 84.45 litres/person/day. This will be achieved through the use of water efficient fixtures and fittings. A copy of the Part G calculation can be found in **Appendix E** and is summarised in Table 4.2, below:

Table 4.2 – Part G Calculation of Proposed Water Usage Per Person

Fixture/Fitting	Capacity/ Flow Rate	Units	Total Water Usage (l/p/day)
WC (full flush)	4	litres	5.84
WC (part flush)	2	litres	5.92
Taps (Excluding Kitchen)	2.7	litres/second	5.85
Bath	130	litres	14.30
Shower	6	litres/second	26.22
Kitchen Taps	4	litres/second	12.12
Washing Machine	6.43	litres/kg	13.50
Dishwasher	0.99	litres/place setting	3.56
		Total	87.31
		Normalisation Factor	0.91
		Total	79.45
		External Water Use	5.00
		Total	84.45

4.4 Using the Part G water consumption figure of 84.45 litres/person/day and the development population of 161.13, it is estimated that the proposed development will be a mains water demand of 13,608.21 litres/day.

4.5 A copy of the example fixtures and fittings required to achieve the above water consumption can be found in **Appendix F**.

4.6 Therefore, the proposed dwellings require **13,608.21 litres/day** to supply the mains water demand.

4.7 At this stage, the proposed development cannot be considered to be water neutral and further offsetting measures must be considered.

5.0 Offsetting Measures

5.1 To ensure the development can demonstrate water neutrality, in accordance with the NE Position Statement, a residual water demand of either 13,608.21 litres/day will need to be offset. This additional water demand must be mitigated through either additional on-site water reduction measures or by further offsetting measures.

5.2 The further offsetting measures will be delivered by purchasing credits in the Sussex North Water Certification Scheme (SNWCS), or through a suitable alternative bespoke offsetting scheme. As the site was a draft allocation within the now withdrawn Local Plan, the site is eligible for access to SNWCS.

6.0 Summary and Conclusions

6.1 This Technical Note sets out the water usage strategy for the proposed development at the Land East of Mousdell Close, Ashington, RH20 3GS.

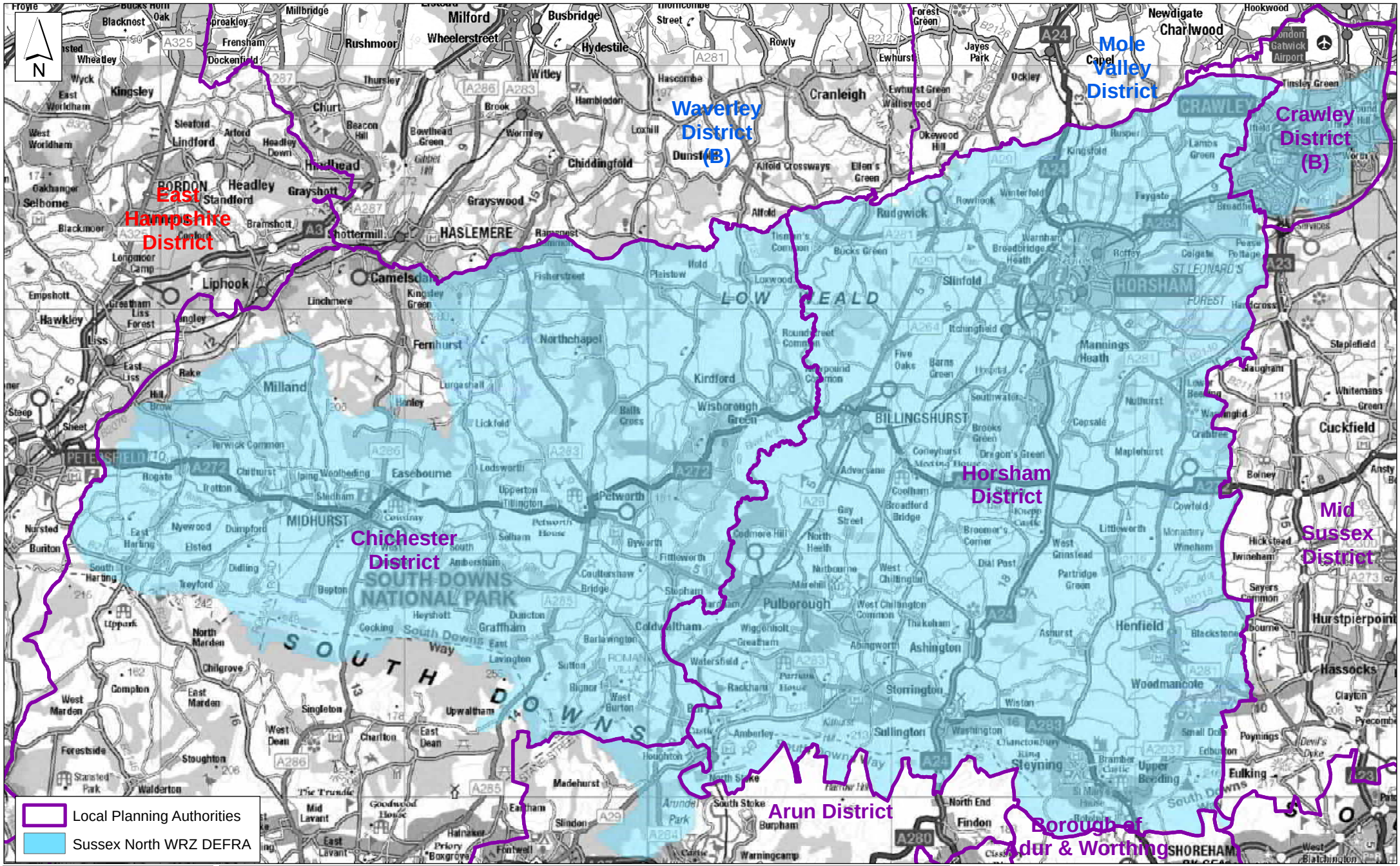
6.2 The proposal is to incorporate water efficient fixtures and fittings to the proposed dwellings, to minimise the water demand of the proposed development to 84.45 litres/person/day.

6.3 The proposed development represents a net increase in water demand within the SNWSZ, and this increase in water demand will be offset off-site through an offsetting scheme either through a bespoke offsetting scheme or via purchasing credits in SNWCS.

6.4 This strategy will minimise the impact of the new development on the SNWSZ. This WNS confirms the proposal will be water neutral once complete and therefore satisfying NE's requirements.

Appendix A

Sussex North Water Supply Zone Map



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 B

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.

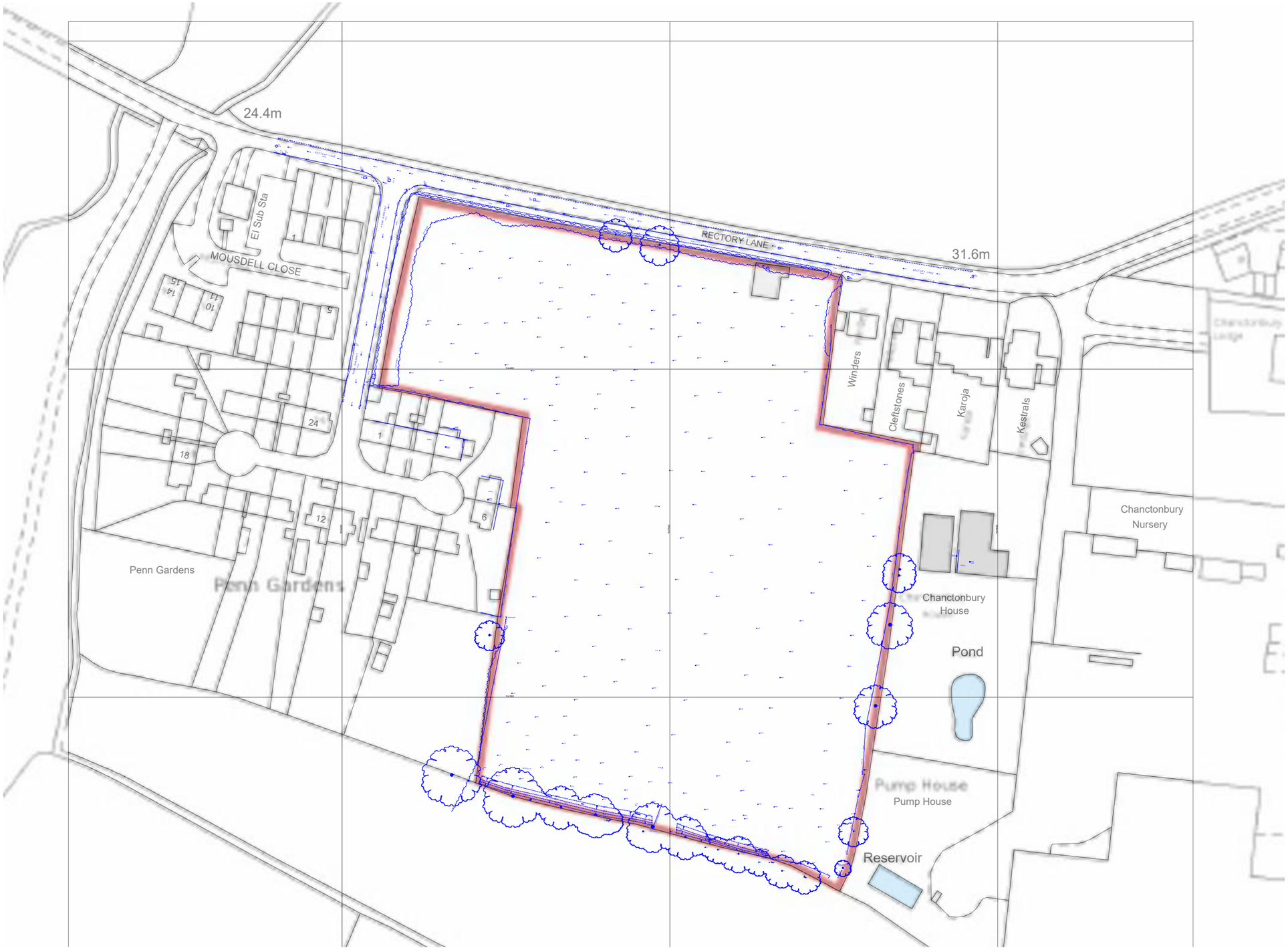
***This this is the reasonably achievable figure with the above measures based on the early data from the strategic solution and may be subject to change as the strategic solution evolves.**

Appendix C

Existing Land Registry

CDM 2015 Health & Safety Information:

This information relates only to 'Significant Hazards' identified on this drawing and is to be read in conjunction with the Designer's Hazard Register.



OS layers in Black
Topo Survey Layers in Blue

N

Client's Name: Rocco Homes	Drawing Title: Land Registry Underlay	
Job Title: Land east of Mousedell Close, Ashington	Scale: 1:250 @ A3 (metres 2 4 6 8 10)	
	Drawn: KE	Checked: AK	Date: 13.03.25
	Job No: 7578	Drawing No: L-01	Rev: A
	Status: INFORMATION	

Rev	Date	Revision Details	Dr	Ch
A	08.04.25	Survey information updated	KB	AK

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CAD Plot date: 8/04/2025 - 09:35:47 — 7578-site v2.dwg

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Appendix D

Proposed Plans & Accommodation Schedule

CDM 2015 Health & Safety Information

This information relates only to 'Significant Hazards' identified on this drawing and is to be read in conjunction with the Designer's Hazard Register.

Accommodation Schedule

Affordable Dwellings **(26no. - 35.1%)**

Affordable Rent

4no.	1-Bedroom Flats	Up to 2.5 Storeys	Blocks A and B	540sqft
4no.	1-Bedroom Flats - M4(3)	Up to 2.5 Storeys	Blocks A and B	660sqft
8no.	2-Bedroom Flats	Up to 2.5 Storeys	Blocks A and B	660sqft
1no.	3-Bedroom Townhouses	2.5 Storeys	Semi / Terraced	1145sqft
1no.	3-Bedroom Townhouses	2.5 Storeys	Semi / Terraced	1271sqft

Shared Ownership

1no.	1-Bedroom Flats	2 Storeys	Block C	540sqft
1no.	1-Bedroom Flats	2 Storeys	Block C	592sqft
2no.	2-Bedroom Houses	2 Storeys	Semi-Detached	855sqft
2no.	3-Bedroom Houses	2 Storeys	Semi-Detached	1003sqft
2no.	3-Bedroom Townhouses	2.5 Storeys	Semi / Terraced	1145sqft

Open Market Dwellings **(48no. - 64.9%)**

2no.	1-Bedroom Flats	2 Storeys	Block D/E	540sqft
2no.	1-Bedroom Flats	2 Storeys	Block D/E	592sqft
8no.	2-Bedroom Houses	2 Storeys	Semi-Detached	855sqft
13no.	3-Bedroom Houses	2 Storeys	Semi- Detached	1003sqft
8no.	3-Bedroom Houses	2.5 Storeys	Semi-Detached	1145sqft
5no.	4-Bedroom Houses	2 Storeys	Detached	1240sqft
1no.	4-Bedroom Houses	2 Storeys	Detached	1261sqft
2no.	3-Bedroom Houses	2.5 Storeys	Semi-Detached	1271sqft
1no.	4-Bedroom Houses	2 Storeys	Detached	1285sqft
2no.	4-Bedroom Houses	2.5 Storeys	Semi-Detached	1340sqft
2no.	4-Bedroom Houses	2 Storeys	Detached	1425sqft
2no.	4-Bedroom Houses	2 Storeys	Detached	1933sqft

Total; 74 Dwellings [2.19 Ha approx. to Overall Ownership Line - 33.78 Dw/Ha]

Car Parking Generally;
1 space per 1-Bedroom Flat
1.5 spaces per 2-Bedroom Flat
2-3 spaces per 2 and 3-Bedroom House (incl. open car barns)
3 spaces per 4-Bedroom House (incl. garages)
23 visitor spaces (1 per 3.26 dwellings)

Rev	Date	Revision Details	Dr	Ch
A	25.07.25	Updated Site Layout	CV	KE

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Client's Name
Rocco Homes

Job Title
Land East of Penn Gardens,
Ashington, West Sussex

Drawing Title
Proposed Site Layout

Scale
1:500 @ A1 / 1:1000 @ A3
metres 10 20 30 40 50

Drawn	Checked	Date
CV	KE	16.07.25

Job No	Drawing No	Rev
7578	PL01	A

Status
APPROVAL

CAD Plot date: 25/07/2025 - 14:22:22 7578-site.dwg

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Appendix E

Part G Calculation

Proposed Water Usage - Part G Calculation

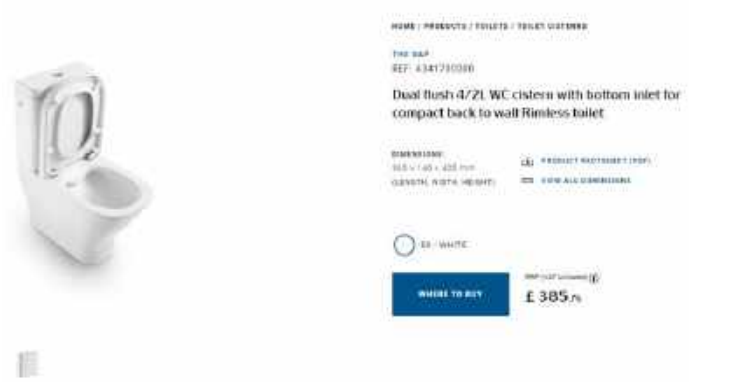
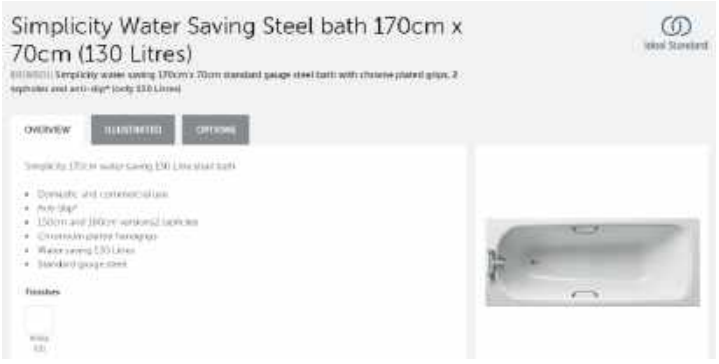
Fixture	Capacity/ Flow Rate	Use Factor	Fixed Use	litres/person/day
WC (Single Flush)		4.42		0.00
WC (Dual Flush)	4	1.46		5.84
WC (Dual Flush) Part	2	2.96		5.92
Taps (excluding kitchen)	2.7	1.58	1.58	5.85
Bath (where shower present)	130	0.11		14.30
Shower (where bath present)	6	4.37		26.22
Bath Only		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

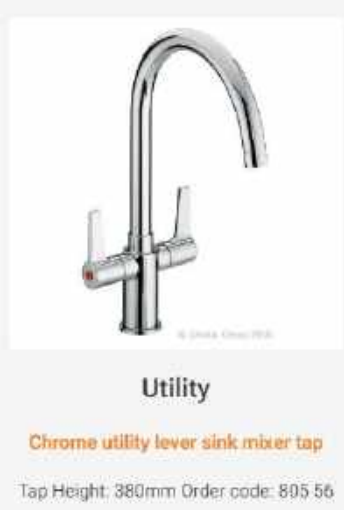
	Number of units	Census	Population	Mains Water Usage (litres/day)
1-Bed Units	14	1.32	18.48	1,560.73
2-Bed Units	8	1.88	15.04	1,270.20
2-Bed Units	10	1.88	18.80	1,587.75
3-Bed Units	29	2.47	71.63	6,049.50
4-Bed Units	13	2.86	37.18	3,140.03
Totals	74		161.13	13,608.21

Appendix F

Example Specification of Fixtures and Fittings

Fixtures and Fittings - Part G Specifications

Item	Capacity/Flow rate	Overview
Toilet (Dual Flush)	4/2 litres	The Gap 
Basin Tap	2.7 litres/minute	Joseph Miles 
Bath	130 litres	Ideal Standard 
Shower	6 litres/minute	Triton 

Kitchen Sink	4 litres/minute	Tap with flow regulator - Affinity by Moores  Utility Chrome utility lever sink mixer tap Tap Height: 380mm Order code: 805 56 Flow Regulator:  • Tap tail type flow limiters are suitable for most Bristan basin, pillar taps, basin and sink mixers. • Operating pressure range – Min. 1.0 bar Max. 5.0 bar. • All flow limiters accurate +/- 10%. • Flow limiting flow straighteners aerates the water for a softer non-splashing flow. • Flow limiting flow straighteners can be easily retro fitted in tap spout (dependent on tap/mixer model). Colour / Flow Rate limited to: / Order Code Pink 1 litre per minute 805 37 Olive 2 litres per minute 805 38 Brown 3 litres per minute 805 39 Grey 4 litres per minute 805 40 Yellow 5 litres per minute 805 41 Black 6 litres per minute 805 42