Technical Note 1: Water Neutrality Statement

Site: Land East of Old London Road, Washington, RH20 3BN
Prepared by: Ella Harrop
Approved by: Phil Allen MCIWEM C.WEM
Date: 26 August 2025

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1.0 Introduction

1.1 This Water Neutrality Statement (WNS) has been prepared for the client, James Williams, to demonstrate how the proposed development at Land East of Old London Road will achieve water neutrality.

1.2 It is proposed to provide four three-bed residential units.

1.3 Horsham District Council (HDC) as the Local Planning Authority (LPA) wish to know whether the proposed development will result in an increase in mains water consumption as it is within the Sussex North Water Supply Zone (SNWSZ). The SNWSZ covers Horsham District, as well as parts of the neighbouring Chichester and Arun Districts as well as part of Crawley Borough and South Downs National Park. A plan showing the SNWSZ area can be found in **Appendix A**.

1.4 Following the issue of Natural England's (NE's) Position Statement on Water Neutrality within the SNSWZ, HDC require all new, reserved matters, conditions discharge and Section 73 planning applications to demonstrate that the development is water neutral. NE's Position Statement can be found in full within **Appendix B**.

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

- The existing, baseline water demand for the site of the development;
- What changes in water demand will occur as a result of the proposed development;
- What water demand reduction measures, such as fitting of water efficient fixtures and fittings will be used;
- If there are any changes in water demand as a result of the proposed development, how these will be offset so that there is no additional mains water draw within the SNWSZ.

2.0 Background

2.1 The existing site is located in Washington, West Sussex and is on the east side of Old London Road and to the west of the A24 London Road, RH20 3BN.

2.2 The site is accessed from Old London Road and is separated from the A24 London Road by a fence line, a watercourse, and a grassed verge/highways margin. The site comprises an approximately rectangular undeveloped plot of land.

2.3 The proposed development is for four three-bed units. The proposed development plans can be found in **Appendix C**.

3.0 Existing Water Demand

3.1 As described above, the existing site at Old London Road does not have a specific land use and no associated water usage.

3.2 Consequently, the 'baseline' existing water demand for the purposes of this WNS is zero litres per day.

4.0 Future Water Demand

4.1 As previously defined, the proposed development will provide four three-bed 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 below.

Table 4.1 – Average district occupancy levels per dwelling size

1-bed	2-bed	3-bed	4-bed
1.32	1.88	2.47	2.86

4.3 Using the above census data and the housing mix defined above, the population of the proposed development is estimated to be 9.88 persons (2.47 × 4 units).

4.4 Part G of the current Buildings Regulations recommends that all developments achieve a 'water efficient' consumption of 125 litres per person per day. This water consumption figure can be used with the population of the proposed development to calculate what the future demand is likely to be.

4.5 Using the Building Regulations water consumption figure of 125 litres per person per day and population size of 9.88, it is estimated that the total water usage per day for the proposed development would be 1,235 litres per day.

4.6 Therefore, following the redevelopment of the existing development, there will be a net increase in water demand of 1,235 litres per day.

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

5.0 Water Reduction Measures

5.1 To further minimise the demand on the mains water, it is proposed that the new dwelling 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 the Building Regulations Part G. This will be achieved through the use of water efficient fixtures and fittings.

5.2 A water calculation in accordance with Buildings Regulations Part G has been carried out and confirms that the proposed dwellings can achieve a reduced main 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 water efficient Part G calculation can be found in **Appendix D** and is summarised in Table 5.1, on the next page.

Table 5.1 – Proposed Water Consumption Figure (l/p/d)

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

5.3 A copy of the proposed fixtures and fittings required to achieve the above water consumption can be found in **Appendix E**.

5.4 Using the Part G water consumption figure of 84.45 litres per person per day and the census-based development population of 9.88, it is estimated that the water usage per day for the proposed development would total 834.41 litres per day.

5.5 Therefore, following the development of the site, there would be a net increase in water demand of 834.41 litres per day.

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

6.0 Offsetting

6.1 To ensure the development can demonstrate water neutrality, in accordance with the NE Position Statement, a residual water demand of either 834.41 litres per day will need to be offset.

6.2 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. We suggest a Grampian condition, as per the below, is applied to the planning consent to ensure an offsetting scheme is secured pre-commencement.

Pre-Commencement Condition: No development shall commence until either:

i.) *Details have been submitted to and been approved in writing by the Local Planning Authority confirming that the necessary credits to achieve water neutrality have been secured via the Sussex North Offsetting Water Scheme.*

OR

ii.) *A site-specific water neutrality mitigation scheme has been submitted to and been approved in writing by the Local Planning Authority. The site-specific water neutrality mitigation scheme shall include full details of the means of any and all onsite and offsite mitigation and any necessary*

agreements pursuant to S106 of the Town and Country Planning Act 1990 to deliver and secure the approved mitigation.

iii.) *The development shall not be first occupied until evidence has been submitted to and been approved in writing by the Local Planning Authority confirming that the approved site-specific water neutrality mitigation scheme has been fully implemented. The approved mitigation shall thereafter be retained, maintained and operated to the same or better water performance standard.*

7.0 Summary and Conclusions

7.1 This Technical Note sets out the water usage strategy for the proposed development at Land East of Old London Road, Washington, RH20 3BN.

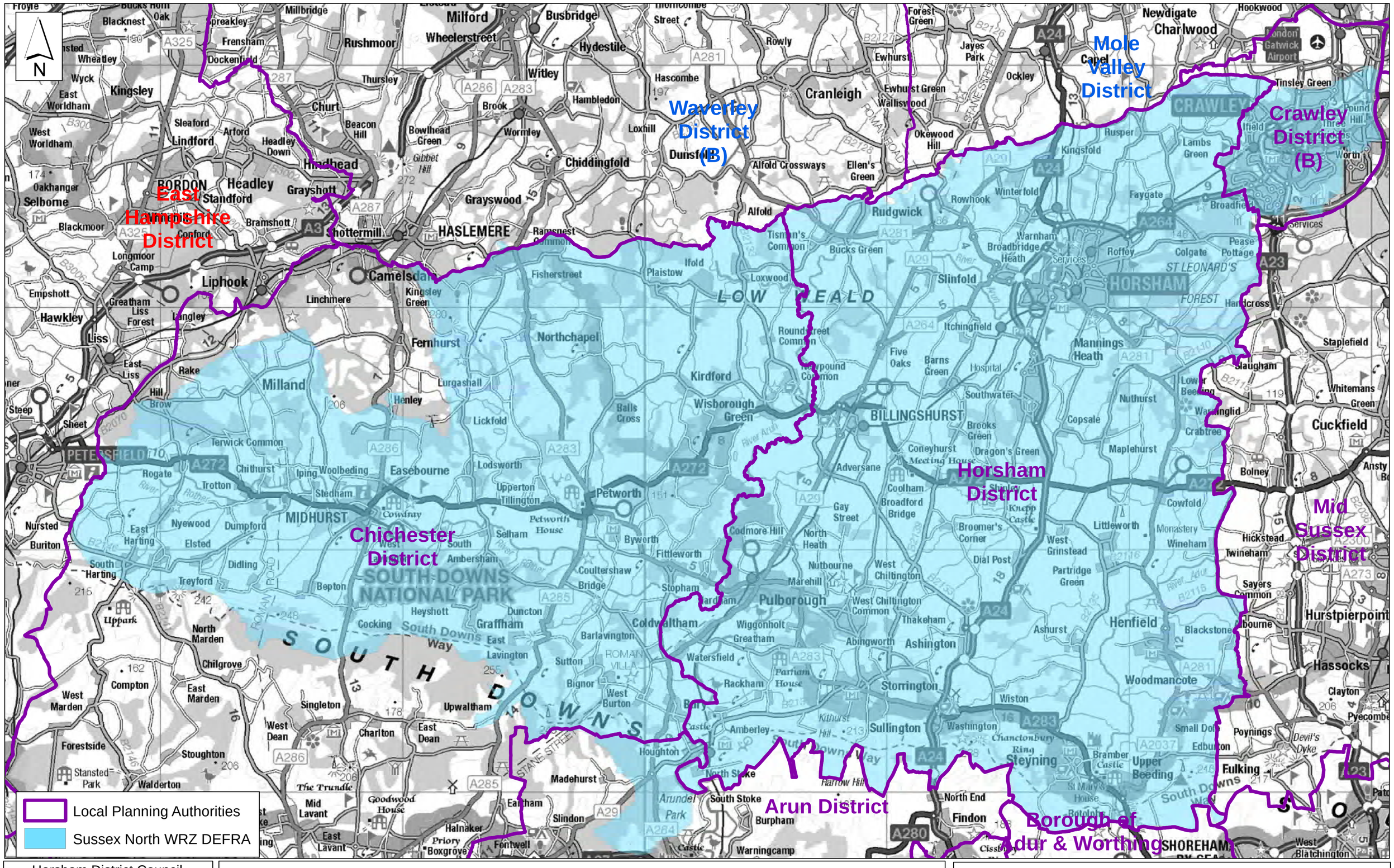
7.2 It is proposed to incorporate on-site water efficient fixtures and fittings to the four three-bed units, to minimise the water demand of the proposed development. This reduces the proposed water demand from the baseline of 125 litres per person per day to 84.45 litres per person per day.

7.3 To offset the proposed development, a site-specific water neutrality mitigation scheme has been submitted and approved in writing by the Local Planning Authority. The development will not be first occupied until evidence has been submitted and approved in writing by the Local Planning Authority, confirming the approved site-specific water neutrality mitigation scheme has been fully implemented.

7.4 This strategy will minimise the impact of the new development on the Sussex North Water Supply Zone. The Water Usage Strategy confirms proposal will be water neutral once complete and therefore satisfying Natural England's requirements.

Appendix A

Sussex North Water Supply Zone



Horsham District Council

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

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.

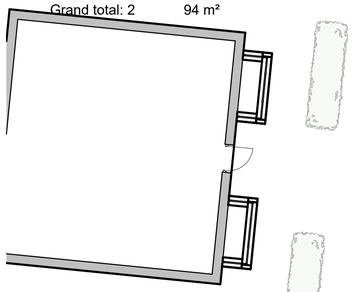
***This this is the reasonably achievable figure with the above measures based on the early data from the strategic solution and may be subject to change as the strategic solution evolves.**

Appendix C

Proposed Development Plans

Plot 1 (GIA)	
Name	Area

First Floor - Plot 1	45 m²
Ground Floor - Plot 1	49 m²
Grand total: 2	94 m²



Plot 2 (GIA)	
Name	Area

First Floor - Plot 2	45 m²
Ground Floor - Plot 2	49 m²
Grand total: 2	94 m²

Plot 3 (GIA)	
Name	Area

First Floor - Plot 3	45 m²
Ground Floor - Plot 3	49 m²
Grand total: 2	95 m²

Plot 4 (GIA)	
Name	Area

First Floor - Plot 4	46 m²
Ground Floor - Plot 4	50 m²
Grand total: 2	95 m²

Notes:

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240 Litres Refuse Bin
240 Litres Recyeling Bin

2.5m x 2.0m Shed for Bikes

2.5m x 5.0m parking Spaces
2 Bays Per Property

Rev_A	Planning Issue	AP	29/05/25

Revision Number	Revision Description	Issued by	Revision Date

DATE: 09/03/25
STATUS: PLANNING ISSUE
SHEET SIZE: A1

SCALE: As indicated
DRAWN: AP
CHECKED:

CLIENT: James Williams
SITE ADDRESS: Land East of MG

REVISION: Rev_A
DRAWING NO: ARC/088/25/07
PROJECT NO: LEMG

DRAWING: New Build
TITLE: Proposed Site Plan

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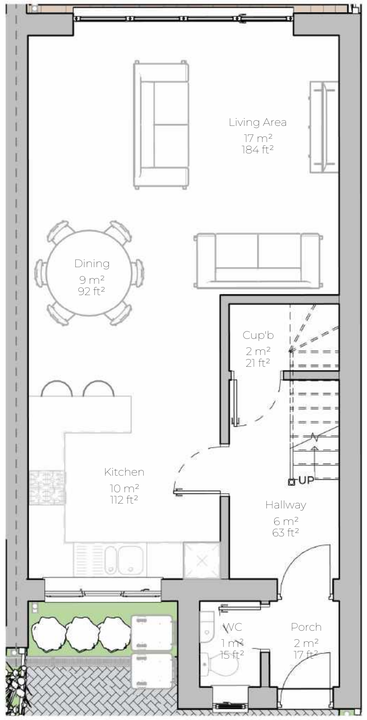
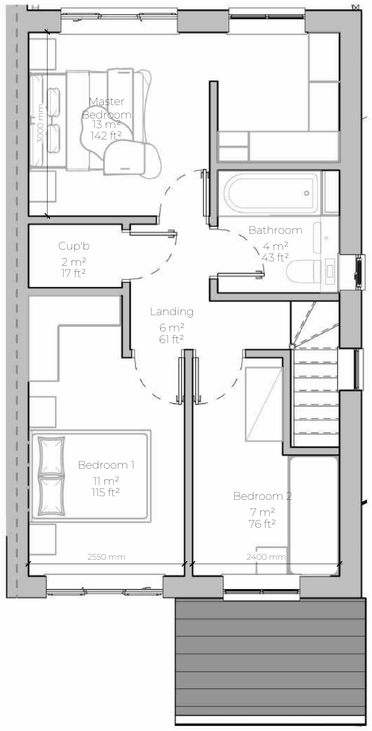


Ground Level - Plot 1

1 : 50



First Floor - Plot 1

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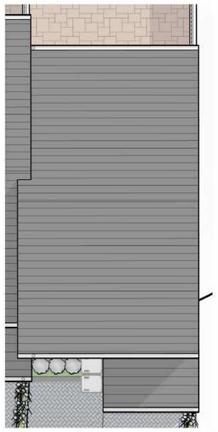


Roof Plan - Plot 1

1 : 100

Plot 1	
Name	Area
Bathroom	4 m²
Bedroom 1	11 m²
Bedroom 2	7 m²
Cup'b	2 m²
Cup'b	2 m²
Dining	9 m²
Hallway	6 m²
Kitchen	10 m²
Landing	6 m²
Living Area	17 m²
Master Bedroom	13 m²
Porch	2 m²
Room	3 m²
WC	1 m²

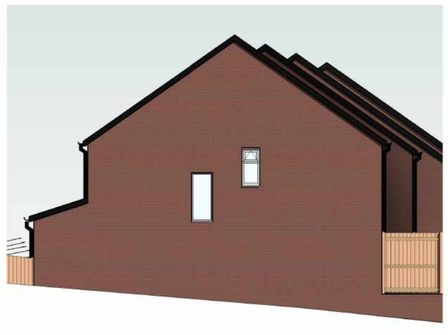
Grand total: 14

Plot 1 (GIA)	
Name	Area
First Floor - Plot 1	45 m²
Ground Floor - Plot 1	49 m²

Grand total: 2 94 m²

Proposed Front Elevation

1 : 100



Proposed Side Elevation

1 : 100

Proposed Rear Elevation

1 : 100

Proposed Side Elevation

1 : 100

0m 2m 4m 6m 8m 10m

VISUAL SCALE 1:100 @ A1

0m 1m 2m 3m 4m 5m

VISUAL SCALE 1:50 @ A1

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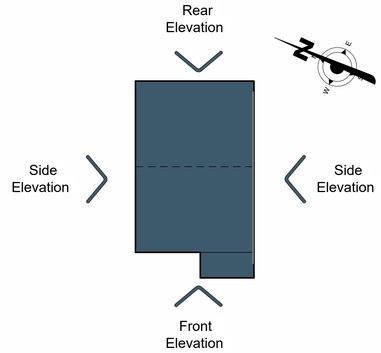

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Revision Number	Revision Description	Issued by	Revision Date

DATE: 09/03/25

STATUS: PLANNING ISSUE

SHEET SIZE: A1

SCALE: As indicated

DRAWN: AP

CHECKED:

CLIENT: James Williams

SITE ADDRESS: Land East of MG

REVISION: Rev_A

DRAWING NO: ARC/088/25/13

PROJECT NO: LEMG

DRAWING: New Build

TITLE: Proposed Plans - Plot 1

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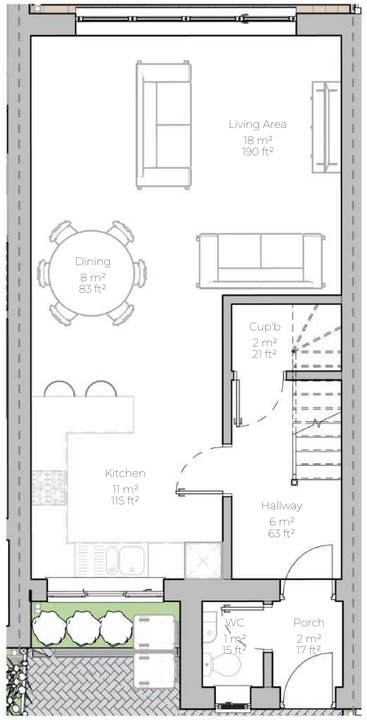

Ground Level - Plot 2

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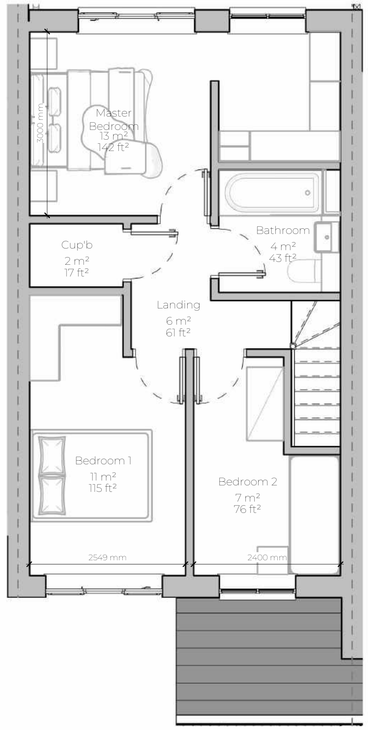

First Floor - Plot 2

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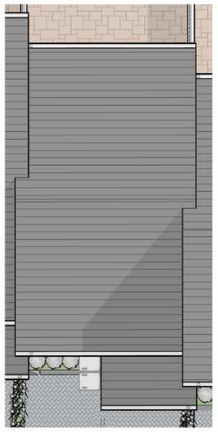


Roof Plan - Plot 2

1 : 100

Plot 2	
Name	Area
Bathroom	4 m²
Bedroom 1	11 m²
Bedroom 2	7 m²
Cup'b	2 m²
Cup'b	2 m²
Dining	8 m²
Hallway	6 m²
Kitchen	11 m²
Landing	6 m²
Living Area	18 m²
Master Bedroom	13 m²
Porch	2 m²
WC	1 m²

Grand total: 13

Plot 2 (GIA)	
Name	Area
First Floor - Plot 2	45 m²
Ground Floor - Plot 2	49 m²
Grand total: 2	94 m²

Proposed Front Elevation

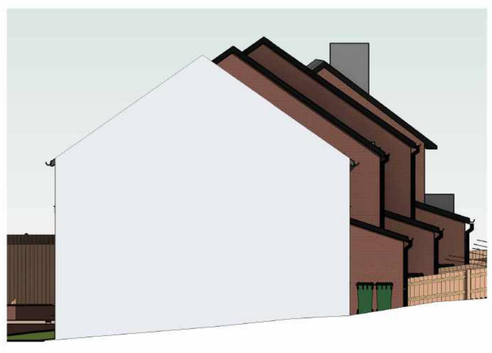
1 : 100

Proposed Side Elevation

1 : 100

Proposed Rear Elevation

1 : 100



Proposed Side Elevation

1 : 100

0m 2m 4m 6m 8m 10m

VISUAL SCALE 1:100 @ A1

0m 1m 2m 3m 4m 5m

VISUAL SCALE 1:50 @ A1

Notes:

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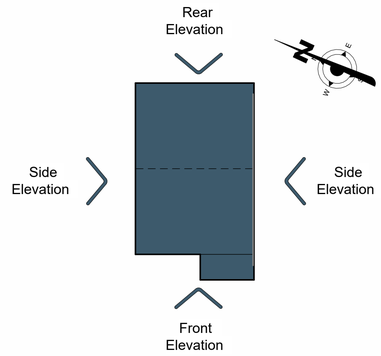

Rev_A	Planning Issue	AP	29/05/25

Revision Number	Revision Description	Issued by	Revision Date

DATE: 09/03/25

STATUS: PLANNING ISSUE

SHEET SIZE: A1

SCALE: As indicated

DRAWN: AP

CHECKED:

CLIENT: James Williams

SITE ADDRESS: Land East of MG

REVISION: Rev_A

DRAWING NO: ARC/088/25/14

PROJECT NO: LEMG

DRAWING: New Build

TITLE: Proposed Plans - Plot 2

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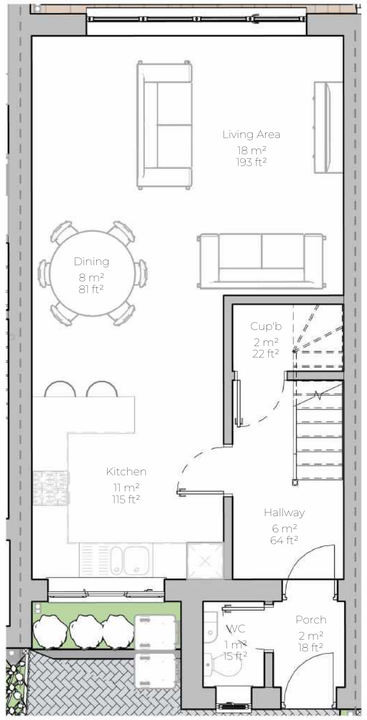

Ground Level - Plot 3

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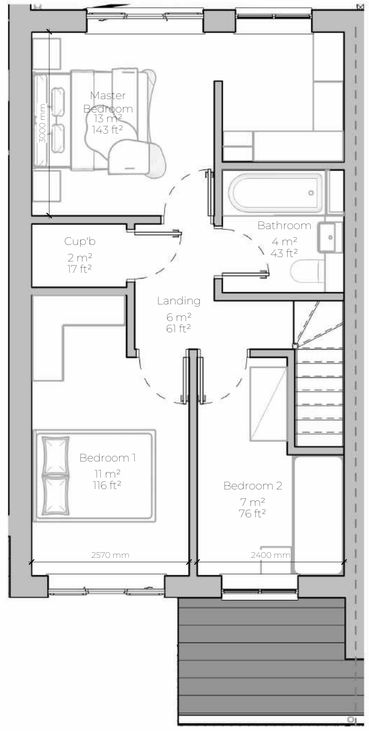

First Floor - Plot 3

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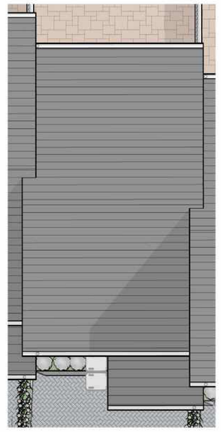

Roof Plan - Plot 3

1 : 100

Plot 3	
Name	Area
Bathroom	4 m²
Bedroom 1	11 m²
Bedroom 2	7 m²
Cup'b	2 m²
Cup'b	2 m²
Dining	8 m²
Hallway	6 m²
Kitchen	11 m²
Landing	6 m²
Living Area	18 m²
Master Bedroom	13 m²
Porch	2 m²
WC	1 m²

Grand total: 13

Plot 3 (GIA)	
Name	Area
First Floor - Plot 3	45 m²
Ground Floor - Plot 3	49 m²

Grand total: 2 95 m²

Notes:

2. WORK TO FIGURED DIMENSIONS ONLY.

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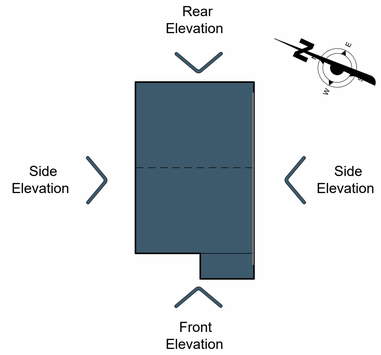


Rev_A	Planning Issue	AP	29/05/25

Revision Number	Revision Description	Issued by	Revision Date

DATE: 09/03/25

STATUS: PLANNING ISSUE

SHEET SIZE: A1

SCALE: As indicated

DRAWN: AP

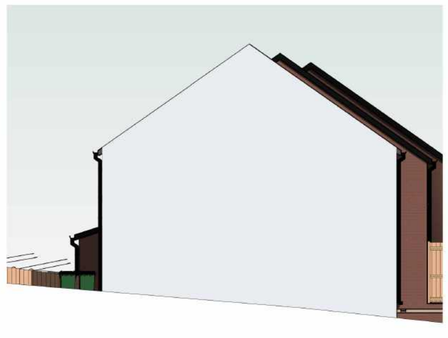
CHECKED:

CLIENT: James Williams

SITE ADDRESS: Land East of MG

Proposed Front Elevation

1 : 100

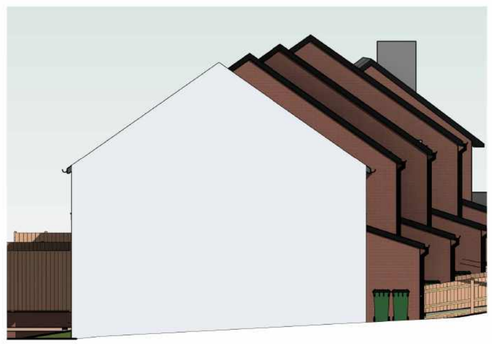


Proposed Side Elevation

1 : 100

Proposed Rear Elevation

1 : 100



Proposed Side Elevation

1 : 100

0m 2m 4m 6m 8m 10m

VISUAL SCALE 1:100 @ A1

0m 1m 2m 3m 4m 5m

VISUAL SCALE 1:50 @ A1

DRAWING: New Build

TITLE: Proposed Plans - Plot 3

PROJECT NO: LEMG

DRAWING NO: ARC/088/25/15

REVISION: Rev_A

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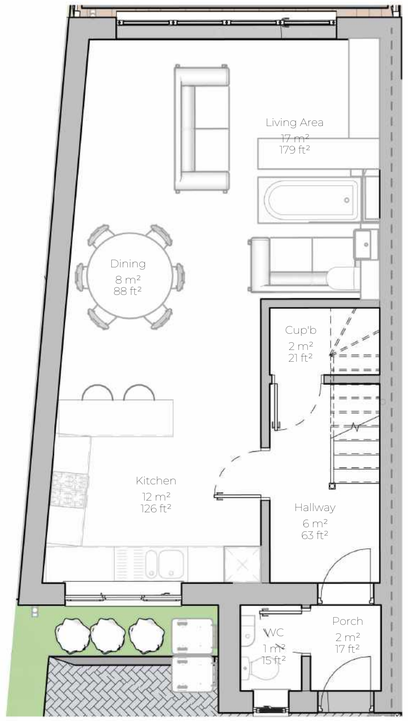

Ground Level - Plot 4

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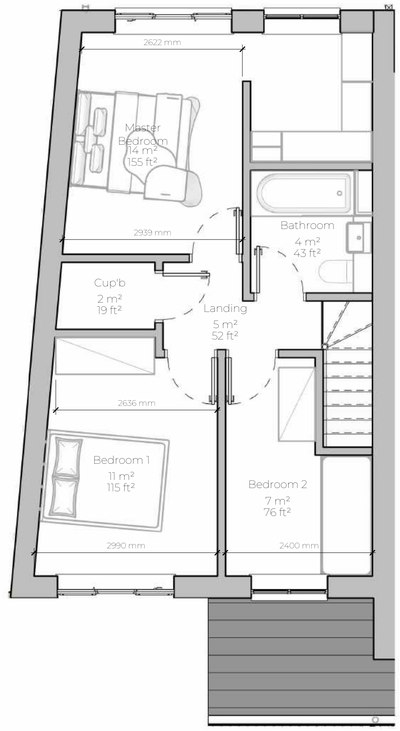

First Floor - Plot 4

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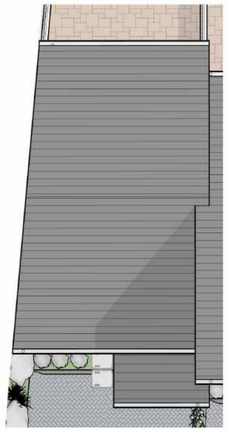

Roof Plan - Plot 4

1 : 100

Plot 4	
Name	Area
Bathroom	4 m²
Bedroom 1	11 m²
Bedroom 2	7 m²
Cup'b	2 m²
Cup'b	2 m²
Dining	8 m²
Hallway	6 m²
Kitchen	12 m²
Landing	5 m²
Living Area	17 m²
Master Bedroom	14 m²
Porch	2 m²
WC	1 m²

Grand total: 13

Plot 4 (GIA)	
Name	Area
First Floor - Plot 4	46 m²
Ground Floor - Plot 4	50 m²

Grand total: 2 95 m²

Notes:

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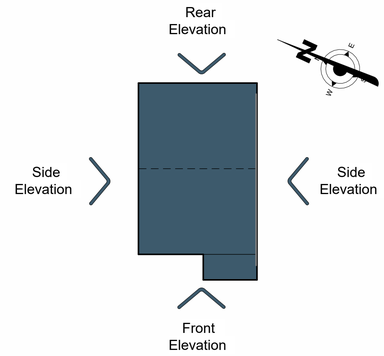


Rev_A	Planning Issue	AP	29/05/25

Revision Number	Revision Description	Issued by	Revision Date

DATE: 09/03/25

STATUS: PLANNING ISSUE

SHEET SIZE: A1

SCALE: As indicated

DRAWN: AP

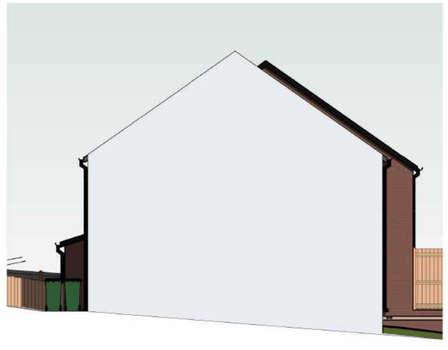
CHECKED:

CLIENT: James Williams

SITE ADDRESS: Land East of MG

Proposed Front Elevation

1 : 100

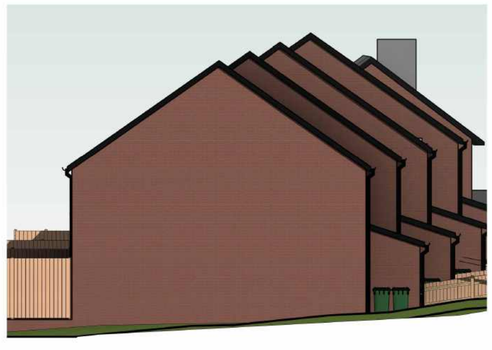


Proposed Side Elevation

1 : 100

Proposed Rear Elevation

1 : 100



Proposed Side Elevation

1 : 100

0m 2m 4m 6m 8m 10m

VISUAL SCALE 1:100 @ A1

0m 1m 2m 3m 4m 5m

VISUAL SCALE 1:50 @ A1

DRAWING: New Build

TITLE: Proposed Plans - Plot 4

PROJECT NO: LEMG

DRAWING NO: ARC/088/25/16

REVISION: Rev_A

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Appendix D

Proposed Part G Calculations

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)
3-bed Unit	4	2.47	9.88	834.41
Totals	4		9.88	834.41

Appendix E

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: