



Project	P2102 – 24 Carfax Horsham
Document	Water Neutrality Statement

Introduction

This Water Neutrality Statement (WNS) has been prepared on behalf of **Geneva Investments** in support of a Full Planning Application for the change of use at 24 Carfax, Horsham, RH12 1EB. The development description for the proposal reads:

“Change of Use from Finance and Professional Services (Use Class A2) to 2no. Apartments (Use Class C3) at the first, second and third floors and open Class E use at ground floor level”

The application site falls within the Sussex North Water Supply Zone (Supply Zone) where public-mains water is, in-part, supplied by way of groundwater abstractions underlying the Arun Valley Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar sites. Natural England issued a ‘Position Statement’ in respect of the Supply Zone on September 2021, addressing the effects of public groundwater abstraction upon the Arun Valley SAC, SPA and Ramsar.

Following the issue of Natural England’s Position Statement on Water Neutrality within the Sussex North Water Supply Zone all new planning applications, reserved matters, conditions discharge and section 73 planning applications within the Supply Zone must demonstrate that the development can be water neutral.

The application site is located within the Supply Zone, therefore, HDC as the Local Planning Authority (LPA) wish to know whether the proposed development represents a change in water consumption and, if so, that the proposed development can be water neutral.

Therefore, to satisfy Natural England’s and HDC’s requirements on water neutrality, this WNS will set out the following:

- The existing baseline for water usage at the site
- The proposed occupation rates and water usage for the development
- What water demand reduction measures, such as the fitting of water efficient fixtures and fittings, will be used
- The proposed strategy to address water usage at the site

We consider this site to be applicable for offsetting via Horsham’s strategic offsetting solution, Sussex North Offsetting Water Scheme (SNOWS).

Existing Water Usage at the Site

The applicant does not have any water meter data to demonstrate the existing water use at the site. The building is currently vacant. On this basis we will be working off a nil water usage as we have no data to back off a proposed usage of the site.

The existing building includes one WC, two handwash basins and two kitchenette basins.



ECE Planning

Residential

The Natural England Position Statement advises a domestic water consumption target of **85 litres per person per day** (l/p/d) for this location, well below the local average of 135 l/p/d.

The Applicant is committed to achieving this ambitious target as the first step to achieving water neutrality and has applied the principles of the Water Hierarchy to design a suitable approach.

The Applicant will reduce demand for water by specifying water efficient fixtures, fittings and appliances for all residential dwellings on the development.

The illustrative schedule of accommodation produced for the proposed development has been combined with extrapolated 2011 census data on average occupancy in Horsham District (as recommended in the Water Neutrality and Planning Applications section of the Horsham District Council website) to estimate a residential population of 3.2 people once the site is fully occupied.

Housetype	Quantity	Occupancy	Total Residents (indicative)
1 Bedroom	1	1.32	1.32
2 Bedroom	1	1.88	1.88
Total	2	-	3.2

Figure 1 - Residential Population of Development based on Horsham Census Data

On this basis, the total estimated daily water use for the residential element of this development would be approximately:

85 litres per person per day x 4 residents = 340 litres per day (worst case scenario)

Total Proposed Water Use

Based on the above, the total proposed water use across the site would be 340 litres per day.

As previously stated, the applicant does not have any water meter data to demonstrate the existing water use at the site.

Therefore, the applicant needs to achieve an offset of 340 litres per day in order to achieve water neutrality for the proposed development.

On this basis, we consider this site to be applicable for offsetting via Horsham's strategic offsetting solution, Sussex North Offsetting Water Scheme (SNOWS), requiring credits equivalent to 340 litres per day.

Sussex North Offsetting Water Scheme (SNOWS)

In order to ensure that water supplies can be maintained and the environment protected, the affected local authorities have worked with consultants, Natural England, Southern Water, the Environment Agency and others to produce a Water Neutrality Strategy.

In order to deliver new development, the Strategy outlines why and how all new development must be highly water efficient to contribute to achieving water neutrality. This means that all development will need to be



ECE Planning

designed to achieve water efficiency standards above the requirements set by the optional requirements in Building Regulations – new residential development will be required to use no more than 85 litres per person per day.

This may include incorporating a range of measures, such as greywater recycling and rainwater harvesting into the design of new development, and fitting water saving fixtures such as flow regulators, low flush toilets, low volume baths, aerated taps and water efficient appliances (in particular, washing machines and dishwashers).

Achieving high level of water efficiency will enable the SNOWS to provide necessary offsetting more effectively, thereby reducing offsetting costs and ensuring viability for all development within the WRZ. Those using the SNOWS to offset water, will ‘buy in’ to the scheme at a level to ensure that their development achieves water neutrality.

As outlined above, the proposed development will include specified water efficient fixtures, fittings and appliances across the site to minimise water use as much as possible. However additional offsetting is required (**340 litres per day**)

The Applicant notes that the LPA are seeking legal advice on the use of Grampian conditions although it is noted that there are at least two Appeal decisions in which Planning Inspector's agree that the use of such a mechanism is acceptable for water neutrality purposes. This is demonstrated within the Storrington Appeal decision (reference APP/Z3825/W/22/3308455) whereby the following condition was secured:

'No development shall commence that results in an increased use of potable water when compared with the existing baseline water usage at the site until either:

- (1) Water neutrality mitigation has been secured via the Council's adopted Offsetting Scheme (in line with the recommendations of the Sussex North Water Neutrality Study: Part C – Mitigation Strategy, Final Report, December 2022) as set out in the Planning Obligation that accompanies this planning permission and this has been confirmed in writing by the Local Planning Authority; or*
- (2) The site specific Water Neutrality Mitigation Scheme set out in the Planning Obligation that accompanies this planning permission has been implemented in accordance with the requirements set out in the Planning Obligation and the Local Planning Authority has given its written confirmation of the same.'*

The above condition would allow the Applicant to secure consent for the site with water neutrality achieved via a Section 106 planning obligation.

In terms of the Council's Offsetting Scheme (SNOWS), we note from the Reg 19 document of the Draft Local Plan, in particular the Habitats Regulation Assessment (dated November 2023) that the scheme is making good progress. It is noted that within the Storrington Appeal decision, the Inspector states at Paragraph 82 that:

'HDC has confirmed that the scheme should be operational from January 2024 and the Mitigation Strategy states that offsetting capacity delivered by the SW demand reduction programme is likely to be available to contribute to water neutrality in new development proposals in 2025'.



ECE Planning

As the Appeal has been approved, we see no reason that the application at 24 Carfax should not be considered for the Sussex North Offsetting Water Scheme and could be approved subject to an appropriately worded Grampian condition.