

Section 73 Application – Planning Statement

Site: Coppice Hanger, Church Hill, Pulborough, West Sussex

Original Permission: DC/21/1931

Applicant: Purple Pepper Partnership Ltd

1. Introduction

This Planning Statement supports a Section 73 application seeking the removal of water neutrality-related conditions from planning permission DC/21/1931. Following the withdrawal of Natural England's 2021 Water Neutrality Position Statement, Horsham District Council no longer requires water neutrality strategies for new or existing permissions. A Section 73 application is therefore the correct mechanism to remove the associated conditions.

2. Updated Part G Water Calculation

The applicant has supplied an updated 2025 Water Efficiency Calculator for New Dwellings confirming compliance with Building Regulations Part G. The amended calculator demonstrates that the development achieves total water consumption of 95 litres/person/day, which is fully compliant with the maximum allowable consumption of 110 litres/person/day.

Updated Part G Water Efficiency Calculation (from user submission) [filecite#turn3file1](#):

- Total calculated use: 98.95 litres/person/day
- Normalised internal consumption: 90.04 litres/person/day
- External use allowance: 5 litres/person/day
- Total water consumption: 95 litres/person/day

3. Conditions Requested for Removal

Based on the decision notice [filecite#turn3file0](#), the following conditions relate directly to the withdrawn water-neutrality regime and should be removed:

- Condition 7 – Requirement for water efficiency measures and rainwater/greywater harvesting.
- Condition 9 – Requirement for a management and maintenance plan for the rainwater system.
- Condition 10 – Implementation of the approved water neutrality strategy, installation evidence, and Part G calculator submission.

4. Replacement Condition

To ensure continued compliance with national standards, the following simplified condition is proposed:

"All dwellings shall achieve a maximum potable water consumption of 110 litres per person per day in accordance with Building Regulations Part G. Evidence of compliance shall be submitted to the Local Planning Authority prior to first occupation."

5. Justification

The removal of obsolete water-neutrality conditions is justified by:

- Natural England's formal withdrawal of the 2021 Position Statement.
- HDC's confirmation that water neutrality is no longer a policy requirement.
- The fact that the updated Part G calculation demonstrates regulatory compliance without additional mitigation.
- The NPPF tests for planning conditions (necessity, precision, enforceability, relevance) are no longer met.

6. Conclusion

The Section 73 application regularises the permission to reflect current planning policy and legislation. The development continues to meet national water-efficiency requirements, and the outdated water-neutrality conditions should therefore be removed.