

**Water Neutrality Statement to Accompany:**

**PLANNING APPLICATION FOR THE MATERIAL CHANGE OF USE OF LAND TO A MIXED USE OF THE STATIONING OF CARAVANS FOR RESIDENTIAL PURPOSES AND THE KEEPING OF HORSES, WITH A DAYROOM, HARDSTANDING AND STABLE BLOCK ANCILLARY TO THAT USE**

**September 2025**

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Client: Mr. W. Ward

<b>Document Title</b>	Water Neutrality Statement
<b>Document Sub-title</b>	N/A
<b>Document Reference</b>	19_1022A
<b>Client Name</b>	Mr. Wayne Ward
<b>Address</b>	Land East of Coolham Road, West Chiltington, West Sussex
<b>National Grid Reference</b>	TQ 10601 18247
<b>Local Planning Authority (LPA)</b>	Horsham Borough Council

#### Quality Assurance

<b>Issue</b>	<b>Date</b>
P01	02/09/2025

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## **1. BACKGROUND OF THE SITE**

- 1.1. Green Planning Studio Ltd (“GPS”) have been instructed by Mr. Wayne Ward (“the applicant”) to submit an application for full planning permission for *the ‘material change of use of land to a mixed use of the stationing of caravans for residential purposes and the keeping of horses, with a dayroom, hardstanding and stable block ancillary to that use’* at Land East of Coolham Road, West Chiltington, West Sussex (“the site”).
- 1.2. This Water Neutrality Statement forms part of the application documents and should be read in line with the accompanying plans and technical reports.
- 1.3. The statement is submitted as the site falls within the Sussex North water supply zone. As set out in Natural England's Advice Note regarding Water Neutrality within the Sussex North Water Supply Zone, the existing water supply in the Sussex North water supply zone cannot be ruled out as contributing to the declines in wildlife within internationally protected sites in the Arun Valley SPA, SAC and Ramsar site.
- 1.4. Policy 31 of the Horsham District Planning Framework (2015) seeks to protect the Arun Valley SAC, SPA and Ramsar site, including requiring adequate measures are put in place to avoid or mitigate any potential adverse effects on the ecological integrity of the site.
- 1.5. The Statement provides an overview of the application intends to achieve water neutrality.

## **2. BASELINE CALCULATION**

- 2.1. The use onsite has been ongoing since December 2020 when the Applicant took occupation of the site due to the Covid-19 pandemic and associated restrictions. The proposal seeks to regularise the existing use.
- 2.2. The existing baseline water use has been calculated using the ‘fittings approach’, specifically through the WAT1 calculator tool. This tool, part of the former Code for Sustainable Homes suite and equivalent to the Building Regulations Part G calculator, enables robust assessment of water consumption.
- 2.3. The baseline, calculated for the use as established from December 2020 and prior to the Natural England notification to the Council in September 2021, is shown in Appendix WNS1 under the column “Type 1”. The total calculated water use is 85.5 litres per person per day.

## **3. PROPOSAL DEMAND**

- 3.1. The proposed water usage, should planning permission be granted, remains unchanged at 85.5 litres per person per day, as shown in Appendix WNS1 under the column “Type 2”. This reflects the ongoing use post-dating the Natural England advice and accurately represents the water demand of the site as currently occupied.

- 3.2. As the existing use of the site does not benefit from planning permission, and is not yet immune from enforcement action, it is considered that any mitigation measures should account for the proposed water demand, in turn regularising the baseline water usage.

#### **4. WATER REDUCTION MEASURES**

- 4.1. The proposal does not incorporate any direct water reduction measures at this time. Water use efficiency will remain consistent with the current usage pattern. The proposed demand has been calculated to reflect such.

#### **5. OFFSETTING MEASURES**

- 5.1. In accordance with the requirements set out in Natural England's Water Neutrality Position Statement and the obligations under Policy 31 of the Horsham District Planning Framework (2015), offsetting measures are proposed to ensure the development achieves water neutrality and avoids an adverse effect on the Arun Valley SAC/SPA and Ramsar sites.

##### **Primary Offsetting Route – Sussex North Water Certification Scheme (SNWCS)**

- 5.2. The preferred method for meeting the development's water neutrality obligations is via the Sussex North Water Certification Scheme (SNWCS), formerly known as the Sussex North Offsetting Water Scheme (SNOWS). The SNWCS offers an offsetting mechanism that enables eligible developments to be constructed in line with Habitats Regulations requirements.
- 5.3. The proposal is considered eligible for SNWCS certification. This is on the basis that the principle of development is established through previous appeal and High Court decisions and is supported in-principle under Policy 23 of the Horsham District Planning Framework. Policy 23 permits unallocated gypsy and traveller sites to come forward in countryside locations, thus meeting the SNWCS eligibility criteria.
- 5.4. A one-off SNWCS certification charge is payable at the rate of £0.80 per litre per day of predicted water use. Based on a water consumption of 86 litres per person per day (rounded from 85.5) and an occupancy rate of 2.5 persons, the total cost of certification is calculated as follows (in accordance with SNWCS Applicant User Guide July 2025):

$$\text{Water use per person per day} \times \text{Occupancy} \times \text{Cost per litre} = \text{Total cost}$$

$$86 \text{ litres} \times 2.5 \text{ persons} \times \text{£}0.80 = \text{£}172$$

- 5.5. The intention is for the applicant to secure certification through this application and make the necessary payment prior to commencement of development.

##### **Pre-Commencement Compliance**

- 5.6. It is expected that a standard pre-commencement condition will be applied to the planning consent, requiring confirmation of the offsetting approach prior to the start of development.

The wording of the condition is anticipated to reflect Horsham District Council's standardised approach, allowing for either the purchase of a SNWCS certificate or the approval and implementation of a bespoke water neutrality strategy.

- 5.7. In accordance with recent decisions, including Ref: DC/25/0150, which supported the eligibility of a similar proposal for SNWCS, it is anticipated that this application will follow the same approach.
- 5.8. Subject to compliance with the pre-commencement condition and successful implementation of the chosen offsetting strategy, the proposed development is not considered to have an Adverse Effect on the Integrity of the Arun Valley designated sites, either alone or in combination with other plans or projects.

## **6. CONCLUSION**

- 6.1. The proposed development will effectively result in an increase in water consumption as the baseline established from December 2020 does not benefit from planning permission, nor is it immune from planning control. Water neutrality will be achieved in full through a secured offsetting scheme provided by the councils own SNWCS.
- 6.2. The approach aligns with current policy; namely, Policy 31, and regulatory guidance on water neutrality, ensuring no adverse impact on water resources as a result of the proposed development.

**Appendix WNS1**

*Water Use Calculator*



Job no: 19\_1022A  
 Date: 29/08/2025  
 Assessor name: Green Planning Studio  
 Registration no: n/a  
 Development name: n/a

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**PRINTING:** before printing please make sure that in "Page Setup" you have selected the page to be as "Landscape" and that the Scale has been set up to 70% (maximum)

**WATER EFFICIENCY CALCULATOR FOR NEW DWELLINGS - (BASIC CALCULATOR)**

Installation Type	House Type:	Type 1		Type 2		Type 3		Type 4		Type 5		Type 6		Type 7		Type 8		Type 9		Type 10			
		Description:	Capacity/ flow rate	Litres/ person/ day																			
Is a dual or single flush WC specified?	Full flush volume	Select option:		6		8.76		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00	
		6		8.76		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00	
		3		8.88		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00	
Taps (excluding kitchen and external taps)	Flow rate (litres / minute)	Select option:		4		7.90		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00	
		4		7.90		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00	
		Shower only		Shower only		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00	
Bath	Capacity to overflow	Select option:		6		8.76		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00	
		6		8.76		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00	
		6		33.60		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00	
Shower	Flow rate (litres / minute)	Select option:		4		12.12		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00	
		4		12.12		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00	
		Yes		Yes		8.17		17.16		8.17		17.16		8.17		17.16		8.17		17.16		8.17	
Kitchen sink taps	Flow rate (litres / minute)	Select option:		8.17		17.16		8.17		17.16		8.17		17.16		8.17		17.16		8.17		17.16	
		8.17		17.16		8.17		17.16		8.17		17.16		8.17		17.16		8.17		17.16		8.17	
		No		No		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00	
Washing Machine	Litres / kg	Select option:		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00	
		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00	
		No		No		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00	
Dishwasher	Litres / place setting	Select option:		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00	
		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00	
		No		No		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00	
Water Softener	Litres / person / day	Select option:		0		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00	
		0		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00	
		Calculated Use		88.4		88.4		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	
Code for Sustainable Homes	Mandatory level	Select option:		80.5		Level 3/4																	
		80.5		Level 3/4		80.5		Level 3/4		80.5		Level 3/4		80.5		Level 3/4		80.5		Level 3/4		Level 3/4	
		80.5		Level 3/4		80.5		Level 3/4		80.5		Level 3/4		80.5		Level 3/4		80.5		Level 3/4		Level 3/4	

