Project:	Land South of Smugglers Lane, Barns Green, Horsham	**Ref:**	TSWC-0018-B-WN01
Subject:	Water Neutrality Assessment	**Date:**	24-Sept-2025
Prepared by:	TS Wood	**Rev:**	-
On behalf of:	Miller Homes and Miller Developments	**Date:**	-

1.0 INTRODUCTION

1.1. TS Wood Consulting (TSWC) has prepared this Water Neutrality Assessment Technical Note (WN01) on behalf of Miller Homes and Miller Developments the 'Applicants', to demonstrate how the proposed development on Land South of Smugglers Lane, Barns Green, Horsham can achieve water neutrality.

1.2. The site is approximately 3.3 hectares and comprises undeveloped land to the west of Chapel Road and is currently classified as greenfield agricultural land in use for occasional grazing of livestock. The north, south and western boundaries are well screened by trees and there is a hedgerow along the eastern boundary between the Site and Chapel Road. A site location plan is presented as **Appendix A**.

1.3. WN01 has been provided to support a Detailed Major Application for a 'Proposed development of 68 dwellings with vehicular and pedestrian accesses, public open space, hard and soft landscaping and associated works including supporting foul and surface water drainage works and works to existing culverted watercourse on site'.

1.4. A plan showing the development proposals along is presented as **Appendix B**.

1.5. The Site has a draft allocation in the emerging Local Plan (eLP) reference BGR1 under Strategic Policy HA6.

1.6. In an email, dated 07 March 2025, the Major Applications Team Leader (Adrian Smith) at HDC confirmed that as the proposed development site benefits from an allocation in the "post submission local plan", it would be eligible for access to the SNOWS scheme

1.7. The Site is allocated for residential development in the emerging Local Plan (eLP) and although adoption of the Plan has stalled and is likely to be withdrawn, a letter from the Head of Strategic Planning at HDC dated 03 June 2025 states:

> *"….Horsham District Council had identified Land South of Smugglers' Lane as a site suitable for allocation….in the event that the plan is withdrawn, the evidence base supporting that plan (including the site assessment work which concluded the Smugglers' Lane site was suitable for development) would remain valid. This would therefore need to be taken into account as part of any consideration of any planning application submitted for the site."*

2.0 BACKGROUND

2.1. On 14 September 2021 (Updated February 2022 V2) Natural England (NE) released a 'Position Statement for Applications within the Sussex North Water Supply Zone (SNWSZ)' on the mitigation of water usage.

2.2. In February 2022, NE released an Advice Note regarding Water Neutrality within the Sussex North Water Supply Zone which defined Water Neutrality as:

> *"For every new development, total water use in the Sussex North Water Supply Zone after the development must be equal to or less than the total water-use in the region before the new development."*

2.3. The area affected by the NE position statement includes parts of Crawley Borough, Mid-Sussex District, Chichester District and areas of the South Downs National Park. Horsham District is located entirely within the affected area.

2.4. In November 2022, NE issued an addendum intended to clarify its view concerning the areas to which its position statement issued 14 September 2021, together with the advice note dated February 2022 (v2) (together "The Position Statements") apply to. The addendum stated:

> *"Based on the best available evidence and the material provided by the Water Companies, the Position Statements should be read as applying to new developments where water abstraction is required from Pulborough as defined by the Water Companies."*

2.5. NE's Position Statements are provided at **Appendix C**.

2.6. The NE addendum [Nov 2022] included a link to a map[1], provided by the water companies in August 2022, which is available on West Sussex County Council's website (see link below) which indicates that the proposed development site at Barns Green (Horsham District) is located within the Sussex North Water Resource Zone (SNWRZ).

2.7. In practice, this means that new development needs to be built to high water efficiency standards, such as by installing water efficient appliances, and including rainwater harvesting, and/or water recycling schemes with any remaining additional potable water use (above the baseline use) being 'offset' elsewhere within the affected area.

2.8. Making new development as water efficient as possible helps to reduce the amount of offsetting that is required to achieve water neutrality.

2.9. This statement sets out the following:

- *The baseline conditions for the existing site;*
- *The additional potable water demand as a result of the proposed development;*
- *Water reduction measures, such as water efficient fixtures and fittings, rainwater harvesting and/or greywater recycling; and*
- *Measures to offset any remaining deficit following the above.*

[1] Sussex North Water Resource Zone Map

3.0 BASELINE CONDITIONS

Existing Potable Water Consumption

3.1. The existing potable water consumption at the site is zero (0).

Average Annual Rainfall at the Development Site

3.2. Point data obtained from the UK Centre for Ecology and Hydrology Flood Estimation Handbook Web Service (FEHWEB) at National Grid Reference (NGR) TQ 12466 26997 indicates that the Standard Average Annual Rainfall ($SAAR_{1961-1990}$), derived from the Standard-period Average Annual Rainfall (SAAR) map for 1961-1990, a 1km grid based on data from the Met Office, for the site is **771mm**.

3.3. The daily total Rainfall (mm) time series for the Itchingfield Rain Gauge [REF: E9290 ID: 314866] [NGR: TQ 12240 28623] was downloaded from the Department for Environment Food & Rural Affairs (DEFRA) Hydrology Data Explorer. The time series raw data is presented as **Appendix D**.

3.4. Upon review, the historical data from the Itchingfield Rain Gauge is limited with incomplete or missing data between June 1999 and December 2021, there are only two complete years of rainfall data between 01-Jan-2022 to 31-Dec-2022 and 01-Jan-2024 to 31-Dec-2024. The total annual rainfall data is presented in **Table 1**.

Table 1: *Annual rainfall data at Itchingfield Rain Gauge*

Period (data)	Total Annual Rainfall (mm)
01-Jan-2022 to 31-Dec-2022	839.09
01-Jan-2024 to 31-Dec-2024	965.65
Annual Average	**902.37**

3.5. Taking a precautionary approach, the lower SAAR of 771mm will be used in the following calculations.

4.0 ADDITIONAL POTABLE WATER DEMAND

Schedule of Accommodation

4.1. The proposed Schedule of Accommodation (SoA) was provided by the Applicants and consists of 6no. 2-Bed Flats, 3no. 1-Bed Houses, 19no. 2-Bed Houses, 25no. 3-Bed Houses, 12no. 4-Bed Houses and 3no. 5-bed House totalling 68 properties. The SoA Revision R is presented as **Appendix E**.

Occupancy

4.2. The average occupancy levels in Horsham District, based on local 2011 extrapolated census data, are summarised in **Table 2** below.

Table 2: *HDC Average Occupancy Levels*

1-bed	2-bed	3-bed	4-bed	5-bed
1.32	1.88	2.47	2.86	3.09

4.3. Based on the proposed housing mix of 68no. properties, the potential occupancy of the site equates to **156.3** new residents.

Potable Water Demand

4.4. Building Regulations Part G: Sanitation, hot water safety and water efficiency of the Building Regulations 2010 (2015 Edition with 2016 Amendments) of the current Building Regulations states:

> *G2. Reasonable provision must be made by the installation of fittings and fixed appliances that use water efficiently for the prevention of undue consumption of water.*
>
> *Water efficiency of new dwellings (36)*
>
> *(1) The potential consumption of wholesome water by persons occupying a new dwelling must not exceed the requirement in paragraph (2).*
>
> *(2) The requirement referred to in paragraph (1) is either*
>
> *(a) 125 litres per person per day; or*
>
> *(b) in a case to which paragraph (3) applies, the optional requirement of 110 litres per person per day, as measured in either case in accordance with a methodology approved by the Secretary of State.*
>
> *(3) This paragraph applies where the planning permission under which the building work is carried out;*
>
> *(a) specifies the optional requirement in paragraph (2) (b); and*
>
> *(b) makes it a condition that that requirement must be complied with.*
>
> *(4) In this Part, "new dwelling" does not include a dwelling that is formed by a material change of use of a building within the meaning of regulation 5(g).*

4.5. The standard potable water required by default is 125 litres/person/day. The 2015 edition of Approved Document G includes an 'optional' standard of 110 litres/person/day which may be imposed by planning condition. This is intended to supersede the ability of planning authorities to require the Code for Sustainable Homes (CSH). The optional standard is equivalent to the minimum water use permitted under CSH Level 4.

4.6. However, to address the water efficiency of new development, the authorities in the affected area have jointly developed a water neutrality local plan policy, which sets a water efficiency standard that is more ambitious than the current 110 litres per person per day standard applied through the Building Regulations. This local standard is set at 85 litres per person per day for new residential development, or a score of 3 credits within the water (WAT01 Water Consumption) issue category for the BREEAM Standard for non-residential development.

4.7. The Sussex North – Water Neutrality Assessment (Final Report) (November 2022) Parts A and B referred to a "Realistic Achievable" scenario of 85 litres/person/day. This is considered achievable through careful design, using very efficient fixtures and fittings and rainwater harvesting and /or greywater recycling within all properties.

4.8. The emerging Horsham District Local Plan (eLP)[2] will require new developments to achieve a minimum water efficiency standard of 85 l/p/day .

4.9. Based on the potential occupancy of **156.3** new residents and the minimum water efficiency standard of **85 l/p/day** the predicted potable water demand for the new development will be ***13,285.5 litres/day*** *(85x156.3)*.

[2] Horsham District Local Plan Reg19 (November 2023) Strategic Policy 9 – Water Neutrality (para. 5.33)

5.0 WATER REDUCTION MEASURES

Sanitaryware Specification

5.1. The Applicants standard sanitaryware specification is presented in **Table 3**.

Table 3: *Proposed sanitaryware specification*

External		
Taps	Provided in rear of properties	
Rainwater Harvesting	TBC	
Internal		
WC	Ideal Standard Connect i Life A (E2492(01)) https://www.idealstandard.co.uk/products/catalog/toilets/cisterns/e2492	**4/2.6 litres Dual Flush**
Shower	Vado Sirkel (AX-SIR-149T-RRK/B-CP) https://www.vado.com/sirkel-showering-solutions-chrome-adjustable-thermostatic-shower-column Wondervalve inline flow restrictor fitted	**8ltr/min**
Bath	Ideal Standard Tempo Arc (E256501) https://www.idealstandard.co.uk/products/catalog/bathing/baths/e2565?c=01	**139 litres**
Basin Taps	Vado Phase (PHA-200F/SB-C/P) https://www.vado.com/phase-chrome-mono-basin-mixer	**5ltr/min**
Kitchen Sinks Taps	Vado Ion (CUC-1006-C/P) https://www.vado.com/ion-chrome-mono-sink-mixer-with-swivel-spout Wondervalve inline flow restrictor fitted	**6ltr/min**
Dishwasher	Electrolux Dishwasher (KEAF7200L) 13 place settings 9.9L use. https://www.electrolux.co.uk/kitchen/dishwashing/dishwashers/built-in-dishwasher/keaf7200l/	**0.76ltr/place setting**
Washing Machine	Electrolux Washer Dryer (EWD746PCBI) https://www.electrolux.co.uk/laundry/laundry/washer-dryers/built-in-washer-dryer/ewd746pcbi/	**6.29ltr/kg**

5.2. The Building Regulation Part G – Table 1A – Water Efficiency Calculator for the above specification is presented in **Table 4** below.

5.3. Based on the calculated consumption figure of **98.01 l/p/d** and a population size of **156.3**, it is estimated that without additional water reuse the total potable water demand per day for the proposed residential development would be **15,318.96 litres per day** (*98.01x156.3*).

Table 4: Building Regulations Part G Water Efficiency Calculator (fixtures and fittings only) specification

		(1)	(2)	(3)	(4)
Installation Type	**Unit of measure**	**Capacity/ flow rate**	**Use factor**	**Fixed use (l/pers/day)**	**Litres/person/day [(1)x(2)x(3)]**
WC Single Flush	Flush Volume (l)	0	4.42	0.00	0.00
WC Dual Flush	Full Flush Volume (l)	4	1.46	0.00	5.84
	Part Flush Volume (l)	2.6	2.96	0.00	7.70
Taps (excl. kitchen/utility)	Flow rate (l/min)	5.00	1.58	1.58	9.48
Bath (shower present)	Capacity to overflow (l)	156	0.11	0.00	15.29
Shower (bath present)	Flow rate (l/min)	6.00	4.37	0.00	34.96
Bath Only	Capacity to overflow (l)	0	0.50	0.00	0.00
Shower Only	Flow rate (l/min)	0	5.60	0.00	0.00
Kitchen Taps	Flow rate (l/min)	6.00	0.44	10.36	13.00
Washing Machine	L/kg dry load	8.17	2.10	0.00	13.21
Dishwasher	L/place setting	1.25	3.60	0.00	2.74
(5)	**Total calculated use = (Sum column 4)**				**102.21**
(6)	Contribution from greywater (litres/person/day) Table 4.6				**0.00**
(7)	Contribution from rainwater harvesting (litres/person/day) Table 5.5				**0.00**
(8)	Normalisation Factor				0.91
(9)	Total water consumption = [(5) - (6) - (7)] x (8)				**93.01**
(10)	External Water Use (Part G requires 5 L/per/d)				5.00
(11)	**Total water consumption = (9) + (10) (litres/person/day)**				**98.01**

Rainwater Harvesting

5.4. To mitigate the increase in potable water demand it is proposed to incorporate rainwater harvesting into the proposed development. Roof water captured from the rainwater harvesting system will be utilised in washing machines, flushing toilets and for external use.

5.5. The Building Regulation Part G Water Efficiency Calculator confirms (**Appendix F**) that a 31.75 litres per person per day reduction in potable water demand could be achieved through the use of rainwater harvesting.

5.6. Rainwater harvesting tanks for the residential development have been sized using the BS EN 16941-1:2018 A.2.1 Basic Approach with Annual Timestep and are presented in **Appendix G**.

5.7. Rainwater harvesting tanks will be provided for each property throughout the site and will provide more than the required storage to achieve at least 35 days (9.6%) drought protection, as required by HDC.

5.8. The calculations presented at confirm that in all cases the yield is more than sufficient to meet the demand.

5.9. By incorporating rainwater harvesting systems into the development, potable water consumption will be reduced to 69.12 litres per person per day as presented in **Table 5**.

5.10. The total potable water demand per day, after incorporating water reduction measures (rainwater harvesting), for the proposed residential development will be **10,804.09 litres per day** (*156.3x69.12*).

Table 5: Building Regulations Part G Water Efficiency Calculator (including rainwater harvesting).

		(1)	(2)	(3)	(4)
Installation Type	**Unit of measure**	**Capacity/ flow rate**	**Use factor**	**Fixed use (l/pers/day)**	**Litres/person/day [(1)x(2)x(3)]**
WC Single Flush	Flush Volume (l)	0	4.42	0.00	0.00
WC Dual Flush	Full Flush Volume (l)	4	1.46	0.00	5.84
	Part Flush Volume (l)	2.6	2.96	0.00	7.70
Taps (excl. kitchen/utility)	Flow rate (l/min)	5.00	1.58	1.58	9.48
Bath (shower present)	Capacity to overflow (l)	156	0.11	0.00	15.29
Shower (bath present)	Flow rate (l/min)	6.00	4.37	0.00	34.96
Bath Only	Capacity to overflow (l)	0	0.50	0.00	0.00
Shower Only	Flow rate (l/min)	0	5.60	0.00	0.00
Kitchen Taps	Flow rate (l/min)	6.00	0.44	10.36	13.00
Washing Machine	L/kg dry load	8.17	2.10	0.00	13.21
Dishwasher	L/place setting	1.25	3.60	0.00	2.74
(5)	**Total calculated use = (Sum column 4)**				**102.21**
(6)	Contribution from greywater (litres/person/day) Table 4.6				**0.00**
(7)	Contribution from rainwater harvesting (litres/person/day) Table 5.5				**31.75**
(8)	Normalisation Factor				0.91
(9)	Total water consumption = [(5) - (6) - (7)] x (8)				**64.12**
(10)	External Water Use (Part G requires 5 L/per/d)				5.00
(11)	**Total water consumption = (9) + (10) (litres/person/day)**				**69.12**

6.0 OFFSETTING MEASURES

6.1. As the development proposals are for new build homes on greenfield land, the use of water efficient fixtures and fittings and rain water harvesting technologies alone are insufficient to make the developments water neutral and offsetting measures to reduce water consumption on other land and property will be required in order to achieve water neutrality.

6.2. In accordance with the NE Positions Statements and HDC Planning Policy, a minimum **10,804.09 litres per day** of potable water will need to be offset.

Sussex North Water Certification Scheme (SNWCS)

6.3. The Sussex North Water Certification Scheme (SNWCS), formerly the Sussex North Offsetting Water Scheme or SNOWS, is a water certification initiative led by the Sussex North authorities (Horsham DC, Chichester DC, Crawley BC, Mid Sussex DC, South Downs National Park Authority & West Sussex CC) located in Southern Water's Sussex North Water Resource Zone (WRZ).

6.4. The purpose of the scheme is to provide applicants with an affordable, accessible way to demonstrate that their development can be constructed in line with Habitats Regulations requirements whilst also allowing the Sussex North authorities to deliver necessary housing and other development to support local needs while meeting water neutrality requirements.

6.5. As stated in Para 1.6, HDC has confirmed that as the proposed development site benefits from an allocation in the "post submission local plan", it would be eligible for access to the SNOWS scheme.

6.6. Based on the above and following the steps set out previously in this document to reduce the water use within the development, the proposals are eligible to receive SNWCS certification subject to the scheme having available capacity.

6.7. In July 2025 HDC released the "SNWCS Applicant User Guide"[the Guide]3 (attached as **Appendix H**) which provides guidance to applicants seeking to use the Sussex North Water Certification Scheme (SNWCS), formerly the Sussex North Offsetting Water Scheme (SNOWS), to meet the water neutrality requirements for their development imposed by Natural England's Water Neutrality Position Statement.

6.8. The Guide provides an overview of which developments can request SNWCS certification and how these will be prioritised, how to apply for SNWCS certification, information requirements for planning applications and SNWCS applications, how the SNWCS process works and associated deadlines, and the one-off cost for SNWCS certification. provides guidance to applicants seeking to use the Sussex North Offsetting Water Scheme (SNOWS) to meet the offsetting needs for their development.

6.9. ***As the development proposals meet the eligibility requirements, the Applicant will be requesting SNWCS certification during the planning application process.***

6.10. To secure access to SNWCS a one-off payment, the SNWCS certification charge will be required. This charge is calculated at £0.80 per litre per day for the planned water use of the development.

6.11. For this development a one-off payment of **£8,643.27** (10,804.09x0.8) will be required.

[3] *SNWCS User Guide (July 2025)*

7.0 CONCLUSIONS

7.1. This Water Neutrality Assessment Technical Note (WN01) demonstrate how the proposed development on Land South of Smugglers' Lane, Barns Green, Horsham can achieve water neutrality.

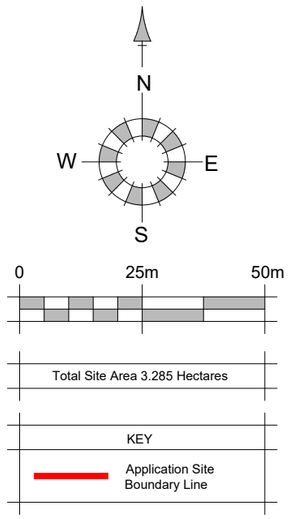
7.2. The proposals incorporate efficient fixtures and fittings and rainwater harvesting systems within all properties to reduce the potable water demand of the new development to 69.12 l/p/day which is a significant betterment over the minimum 85 l/p/day policy requirement of the HDC eLP.

7.3. Following the incorporation of the on-site efficiency measures identified above, the remaining increase in potable water demand (*10,804.09 litres per day*) will be off-set by requesting SNWCS certification during the planning application process.

7.4. For this development a one-off payment of **£8,643.27** (10,804.09x0.8) will be required.

7.5. The above clearly demonstrates that the development proposals and associated offsetting measures can achieve water neutrality in accordance with Natural England's Position Statements and HDC Planning Policy.

Appendix A



REV.	DATE	REVISIONS:	BY	REV.	DATE	REVISIONS:	BY	STATUS:

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CLIENT: Miller Homes		PROJECT: Barns Green, Horsham	
SCALE: 1:1250 (A3 ORIGINAL)		DRAWING: Site Location Plan	
DRAWN: A.Gh. DATE: Apr.'25	24088	S101	–

architecture planning masterplanning
Broadmede House, Farnham Business Park,
Weydon Lane, Farnham, Surrey GU9 8QT.
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Appendix B

N
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architecture

Coloured Site Layout
Barns Green, Horsham
24088 / C101

Scale 1:500 @ A1 September 2025

OSP Architecture, Broadmede House, Farnham Business Park, Weydon Lane, Farnham, Surrey, GU9 8QT Tel: 01252 267878
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Appendix C

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.**

Natural England's Advice Note regarding Water Neutrality within the Sussex North Water Supply Zone: February 2022 V2

This Advice Note is designed to expand upon and clarify the Statement issued on 14 September 2021 and applies solely to the Sussex North Water Supply Zone

Background

The impact of groundwater abstraction within the Sussex North Water Supply Zone has been of concern to Natural England since 2019. In particular, Natural England believes that the ongoing abstraction is having a detrimental impact on a number of designated sites including Amberley Wild Brooks SSSI and Pulborough Brooks SSSI. These form part of Arun Valley SPA, Arun Valley SAC and Arun Valley Ramsar site ("together the Habitats Sites").

Natural England first advised Southern Water in December 2019 that it could not conclude, with certainty, that the existing abstraction within the Sussex North Water Supply Zone was not having an adverse impact on the integrity of the Habitats Sites, through reduced water levels and potential water quality impacts.

In addition to existing pressures, Natural England is also concerned that the Sussex North Water Supply Zone is likely to be subject to significant future development pressures. These will necessitate increased abstraction within the region and are likely to further exacerbate any existing impacts on the Habitats Sites.

Natural England is currently undertaking a full integrated condition assessment of the SSSI sites that make up the Habitats Sites. The present indication (on the basis of water levels) is that the sites' condition is Unfavourable. Monitoring is ongoing in relation to water quality and the final report is expected by the end of June 2022. Natural England awaits the findings of this report before drawing any definitive conclusions regarding the Habitats Sites. However, at this stage existing abstraction cannot be ruled out as contributing to or causing an ongoing adverse impact on the sites.

Pursuant to these concerns, on 14 September 2021 Natural England advised the relevant Local Authorities that the existing abstraction within the Sussex North Water Supply Zone could not be ruled out as causing an adverse effect on the Habitats Sites. Furthermore, if further development were to be consented in this region (with the requirement for additional abstraction) such development was likely to have an adverse effect on the Habitats Sites.

Natural England is closely involved with the relevant local authorities, the Environment Agency and Southern Water in developing a longer-term strategy to integrate Water Neutrality into the relevant Local Plans. However, while this broader strategy remains in development, Natural England are seeking to propose mechanisms whereby the concept of Water Neutrality can be integrated into individual planning decisions to ensure that future development can proceed in a manner that does not further adversely affect the Habitats Sites, notwithstanding these pressures.

Definition of Water Neutrality

Water Neutrality is not currently defined in legislation, but is drawn from the Gatwick Sub regional Water Cycle Study (2020)[1]

> *"For every new development,* ***total water use in the Sussex North Water Supply Zone*** *after the development must be* ***equal to or less*** *than the total water-use in the region before the new development."*

'New development' is considered to be any relevant project requiring a public water supply from Southern Water's Sussex North Water Supply Zone, but is likely to be dominated by large planning applications.

The decision on whether the 2017 Regulations apply to a specific project will be a matter for the relevant Competent Authority (usually the local planning authority). However, the 2017 Regulations are likely to apply to any development which could materially increase water consumption. This could include dwellings, office, commercial and educational development among others.

Water Neutrality requirements would not apply to existing public water supply use (save in respect to their potential for off-setting).

Achieving Water Neutrality

Further details on how Natural England suggest Water Neutrality be achieved are set out in the Frequently Asked Questions documents (December 2021).

In summary, the amount of water from new developments using public water supply in the Sussex North Water Supply Zone will be calculated on an individual or cumulative basis to produce a predicted "demand" for water from growth.

Once this per-capita calculation has been made, each new qualifying development will need to demonstrate how that development will achieve no net increase in water consumption. This can be done through a combination of:

- water efficiency measures; and,
- offsetting

Natural England particularly welcomes nature-based solutions where these are available.

Whilst a range of measures are likely to be possible, it will be important to ensure that any measures take the form of mitigation rather than compensation to the Habitats Sites, in order to comply with the 2017 Regulations. This means that measures must avoid impacts (reduction in water reaching the Habitats Sites), rather than addressing the impacts once they have occurred.

Legal basis for Water Neutrality

In order to avoid an adverse effect on integrity, the conservation status of a habitat must, if favourable, be preserved. If unfavourable, it must not be further harmed or rendered more difficult to retore to a favourable status. It is this which Water Neutrality is seeking to achieve.

[1] Gatwick Sub-Region Water Cycle Study, Final Report (August 2020) JBA Consulting

The concept of Water Neutrality has been developed to form what is intended to be a legally robust and proportionate route to consenting plans and projects where a site is in Unfavourable Conservation Status or in Favourable Conservation Status but exceeding the relevant thresholds.

However, whilst Natural England encourages the adoption of Water Neutrality by decision makers, this is only a tool to help ensure compliance with the 2017 Regulations, and does not preclude the consideration by local planning authorities of alternative methods to protect the Habitats Sites whilst enabling development, provided the Habitat Regulations Assessment tests are met.

Furthermore, each project will continue to require its own assessment. The Advice Note is not intended to pre-judge the outcome of individual applications, each of which will need to be considered on its individual merits and the findings of its accompanying assessment.

For the avoidance of doubt, since the 2017 Regulations cannot be applied retrospectively, the requirement for Water Neutrality will not apply to any projects with full planning permission prior to the Natural England Statement being published on 14 September 2021, in addition this would equally apply to not requiring future developments to mitigate the impact of those developments already granted full permission at that point.

It is Natural England's intention that Water Neutrality is integrated into relevant Local Plans in partnership with local authorities. However, given the existing stresses on the sites and the need to engage with individual planning decisions, the Statement is considered the most effective interim approach to help ensure that any planning applications within the Sussex North Water Supply Zone can be determined in compliance with the 2017 Regulations whilst the Strategy is evolving.

Strategic long-term approach

Given existing pressures, both environmental and developmental, achieving Water Neutrality is likely to remain necessary for as long as the adverse effect risk from water supply abstraction continues, and may be required until the Habitats sites in question are restored to FCS. In practical terms, this is likely to require the delivery of an alternative water supply (estimated around 2030 with significant uncertainty).

The situation continues to evolve, and Natural England intends to update this Statement periodically as the evidence base on the Water Neutrality, the strategic solution and other material matters develops.

Arun Valley and Water Neutrality - Frequently asked questions (FAQs) - Developers

March 2022

How to use this FAQ Document

This document should be read in conjunction with the Natural England (NE) Statement for applications within the Sussex North water supply zone. These frequently asked questions (FAQs) are to developers in considering the Statement when applying for development in Sussex North.

This document will be updated periodically as the evidence base on water neutrality, the strategy and other material matters evolve and change.

Each question is summarised in the table below. Clicking on the FAQ question or topic group in the table takes you to the answer in this document.

	Does the Statement apply to other abstraction licence holders in Sussex North?
	Would development and permissions for non-consumptive use be captured by the Statement including minerals and waste?
D: Southern Water Licences and Responsibilities	Is anything being done to make the abstraction licences in Sussex North more sustainable and help remove the need for water neutrality?
	Why is water neutrality being sought through planning now, why is Southern Water not responsible for this?
	How does water neutrality relate to Southern Water's Target 100 strategy?
	If applicants connect to an alternative supply/provider (SES Water or South East Water) would there still be a need for water neutrality?
	What are the long-term water supply alternatives?
E: Development Control (DC)	
	Can nature-based solutions be used and are there any examples?
DC – General	How does water neutrality relate to draft policies in the Horsham and Crawley Plans asking for 100 l/p/d or 80 l/p/d for strategic development?
	Can I just pay an offsetting charge?
DC – Pre-Application	Where would a prospective developer start to achieve neutrality?
	A Water Neutrality Statement will be required to support applications. What should this demonstrate and how will it be assessed?
	Can NE provide advice for developers e.g., through pre-application advice services or advice on to local planning authorities on water budgets submitted with development?
DC – Consideration of existing land use	How should existing land uses be taken into account when considering water neutrality? .
	Where there is a proposed change of use between non-residential uses is it acceptable to use the BREEAM Wat 01 calculation tool for existing use?

	Where a building has been demolished prior to an application for planning permission is it possible to offset the water use?
DC- Offsetting	What types of offsetting measures will/will be acceptable?
	Can I propose a solution to offsetting for my or another development? What if we can collectively provide offsetting?
	How can offsetting be secured through the planning system?
	When should offsetting be delivered in relation to the development delivery?
	What are the short, medium, and long- term approaches to offsetting and how is consistency being considered?
	What are the relevant industry standards against which to judge the efficacy of the offsetting proposed?
	How can delivery of water efficiency measures for new build development be monitored and enforced?
	Can private water supply bore holes enable water neutrality when you must have a connection to Southern Water to meet building regulations?

A:WATER NEUTRALITY SUMMARY

What is water neutrality?

The definition of water neutrality in Natural England's Statement is taken from that used in the final report of Water Neutrality Study: Part A – Individual Local Authority Areas[1];

"For every new development, total water use in the region after the development must be equal to or less than the total water-use in the region before the new development."

How is water neutrality achieved?

Water neutrality is achieved through a combination of water efficiency measures for new developments to reduce the water use per person (called per capita consumption). The amount of water from new homes, offices and other developments that use public water supply in the Sussex North water supply zone is then calculated on an individual or cumulative basis to produce a predicted "demand" for water from growth. This total amount of water from growth is then offset by reducing the amount of water currently used in the Sussex North water supply zone.

Some examples of offsetting measures and the first part of the strategic solution evidence base can be found in Water Neutrality Part A - Individual Planning Authority areas July 2021.

B: BACKGROUND

Why is water neutrality needed? – simple explanation

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, Sussex. The Arun Valley is legally protected for its wintering birds, its wetland habitats, a rare snail species, invertebrates and several rare and uncommon aquatic and wetland plants.

Evidence shows that wildlife within the Arun Valley site is declining. Some of the designated site has been shown to be linked hydrologically to a layer of rocks from which water is currently being abstracted, or in other locations the hydrogeological link cannot be ruled out.

Following case law on the Conservation of Species and Habitats Regulations 2017, where existing impacts are causing declines on designated sites, further impacts should be avoided where possible. Since the public water supply abstraction cannot be ruled out as one of the existing impacts making development water neutral prevents development increasing the impacts on the wildlife and therefore meets these legal tests. As an extra benefit, water neutrality improves the overall sustainability of the development by reducing water consumption and therefore also energy consumption and carbon.

[1] Water Neutrality Part A - Individual Local Planning Authority areas July 2021.

Why is wildlife in the Arun Valley so important?

The Arun valley is one of the most biodiverse floodplain wetlands in England. It has several legal designations including:

- Arun Valley Special Protection Area (SPA) – classified for its wintering birds including Bewick swan, its assemblage of wintering wildfowl and the supporting wetland habitats.
- Arun Valley Special Area of Conservation (SAC) - notified for a rare and threatened snail called *Anisus vorticulus* or little whirlpool ram's horn snail and its supporting wetland habitats.
- Ramsar Site – listed for its wintering birds, rare invertebrates, rare aquatic and wetland plants, and the supporting wetland habitats.
- Three Sites of Special Scientific Interest (SSSI) that underpin the other designations. (Pulborough Brooks, Waltham Brooks and Amberley Wild Brooks). The SSSIs are notified for all the above and for the large peatland at Amberley.

What evidence is there that wildlife in the Arun Valley is declining?

Natural England first became alerted to issues in the area in 2019 when Southern Water started to look at changing its abstractions at Pulborough to increase supplies to Sussex North water supply zone, specifically in relation to the out-of-date information on the wildlife of the Arun Valley designated sites. At this stage, Natural England had some background information and survey data which suggested that there were concerns in relation to the condition of the wildlife on the site. The field work to update the condition assessment was due to start in April 2020 but was delayed until May 2021 due to COVID restrictions.

A full Natural England condition assessment survey of ditches, plants, wetlands, invertebrates has now been completed with the final survey undertaken in October 2021. The full condition assessment data analysis will be completed by March 2022. The accompanying report is expected to be published by Autumn 2022, pending the results of the water quality monitoring. Water quality data must be collected for a full year and will be complete in June 2022. This will provide additional data for the assessment of the supporting habitat, reasons for declines in the snail and bird features and information on the Ramsar plant, invertebrate and wetland/ditch habitat features as well as for the SSSI features.

The review to-date has shown (with source of information in brackets):

- The SAC feature (*Anisus vorticulus*) has been reduced to a small population around a single ditch (in Oct 2021 survey) in Amberley Wild Brooks having been moderately widespread previously and has gone entirely from south of Pulborough Brooks where it was present, if uncommon, previously. This is a loss of up to three quarters of its former range within the SAC. This former range was a quarter of the species UK population. The SAC is therefore failing its conservation objectives for range and distribution and the species is at risk of going extinct on the site. (various studies including Natural England commissioned October 2021 Survey of *Anisus vorticulus* - in preparation).
- SPA and Ramsar wintering bird features – only teal are meeting their conservation objective population targets (wetland bird survey (WeBS) data BTO).
- A peer reviewed paper (Hicks *et al* 2019[2]) shows statistically significant changes in the vegetation community, including those that form part of the Ramsar and SSSI features, in the north of Amberley Wild Brooks, indicative of slowly drying conditions.

[2] Hicks,D , Abraham F., Bardsley L., Cousins M., Webster E. & Whitman J. (2019) Spatial and temporal vegetation analysis of Amberley Wild Brooks over two decades British &Irish Botany 1(4):309-326

- Environment Agency (EA) water quality monitoring is limited – but shows ditch water quality is exceeding nutrient targets for total phosphorus -TP values) National guidance recommends more stringent total phosphorus values for sites with groundwater input and total nitrogen (TN) targets on still waters and ditches with aquatic plant and invertebrate interest. Groundwater that is abstracted is less nutrient rich than surface water on which the site must rely currently and the drying on the site makes the impacts of the high nutrients in the surface water greater by reducing the dilution.
- A technical study into habitat management for the SAC snail (as part of back from the brink partnership work) shows water quality, in particular suspended solids, are issues for the SAC snail. These suspended solids are likely to be from the clay in banks when they collapse and/ or from overtopping. The water turbidity is exacerbated by the very shallow or dry ditches in summer on Pulborough Brooks
- All the impacts on designated sites appear to be exacerbated by climate change. (Hicks et al 2019)

Why do Natural England think Southern Water's abstraction is affecting the protected sites and wildlife?

In early 2019 Southern Water set out its draft plans for reconfiguring (moving) its abstraction wellfield at Pulborough so it could make better use of its existing abstraction. This would bring the abstraction boreholes closer to designated sites. Over the following months Natural England reviewed the water companies' data as they submitted it, including their draft Habitats Regulations Assessment for the borehole reconfiguration, new water resource models and some of the data that had underpinned the EA review of consents in 2008.

Combining all this data with the emerging evidence indicating the sites were slowly drying (e.g., Hicks *et al* 2019[3]) led Natural England to find that it was not possible to conclude no adverse effect on integrity for the Arun Valley designated sites, should the abstraction go ahead as proposed. The reasons for this were set out in a letter to Southern Water in December 2019.

The December 2019 letter is of a highly technical nature and in part redacted for legal reasons but has been provided to the LPAs with this FAQ.

The information on ecological decline provided in the December 2019 letter is summarised in "What evidence is there that wildlife in Arun Valley is declining?" above. The key sections from the December 2019 letter which set out the hydrological links on the site are provided below:

- Based on detailed reviews of superficial and underlying geology, new and old boreholes logs and new Southern Water and Natural England ground water modelling data, the area that shows the significant community change in the Hicks *et al* paper (2019) on Amberley Wild Brooks is consistent with the area that is connected to the aquifer and therefore, theoretically, the abstraction. Though this drying may also be climatic, NE does not have sufficient evidence to rule out any combined impact of the climatic drying and the abstraction.

[3] Hicks,D , Abraham F., Bardsley L., Cousins M., Webster E. & Whitman J. (2019) Spatial and temporal vegetation analysis of Amberley Wild Brooks over two decades British &Irish Botany 1(4):309-326

- The hydrogeology of the designated sites is complex. The underpinning geology varies spatially and is overlain by a range of drift deposits that vary in their permeability across the three designated sites. It is uncertain what the significance of groundwater supply from the abstracted aquifer to the designated sites would be without the abstraction. The British Geological Survey (BGS) maps and national peat mapping show there are significant areas of peat on the northern area of Amberley Wild Brooks, on the south eastern area of Pulborough Brooks and on the eastern margin of the north of Pulborough Brooks. These areas of peat are also reflected by the Amberley citation and by local knowledge. These areas of peat are coincident with areas of the sites underlain by the aquifer and potentially permeable superficial deposits that potentially provide a pathway for groundwater discharge to the edges of the designated sites. The presence of peat suggests considerably wetter conditions than currently and could be indicative of significant groundwater connectivity in the past.

- The potential for hydrological connectivity between the peat areas at the wetland surface and the aquifer beneath cannot be ruled out. Combined with the evidence of vegetation community changes indicative of drying, the uncertainty of the impact of the wellfield proposals and existing abstraction remains for Amberley Wild Brooks.

- Results from Southern Water's numerical groundwater modelling in 2019 predicted the without abstraction height of water (naturalised head) is predicted to be 4-6 metres above ground level whilst abstraction generates a water level (head) that hovers around ground level at Pulborough Brooks, In the absence of the abstraction, the model predicts the site would be much wetter than it is now, with significant groundwater input.

Will the Statement change or be updated?

NE 's Statement will be updated periodically as the evidence base on the water neutrality, the strategic solution and other material matters evolve and change.

How long will water neutrality be required?

It is likely that achieving water neutrality will be important for as long as the adverse effect risk from water supply abstraction continues. This may well remain the case until the Habitats Sites in question are restored to favourable conservation status. Though there is an investigation to try to resolve the uncertainties this is not thought likely to remove the adverse effect risk with certainty.

It should be possible to phase out the requirement for water neutrality once a sustainable long-term water supply has been secured for the region, and this is close enough to being delivered that the commencement of use of any development being assessed is not likely to occur before delivery of this supply. Current expectations are for alternative water supplies to be delivered circa 2030, although there is significant uncertainty in this timetable. For this reason and for the purposes of strategy development, it is understood that LPAs are including housing up to 2036 in the water neutrality budget calculations.

C: LOCATION AND TYPE OF DEVELOPMENT

Where does the Natural England Statement apply?

The Natural England Statement applies to development that requires a public water supply from Southern Water's Sussex North water supply zone.

Does the Statement only apply to new dwellings or development with overnight stays like nutrient neutrality in the Solent?

It applies to all new development that could increase water consumption therefore development other than dwellings including office, commercial and new educational use and supplied by public water supply should be assessed. Water consumption is a directly measured attribute so does not require the application of assumptions used in nutrient neutrality, and so the risk of double counting is removed.

Does the Statement apply to existing public water supply uses?

Existing water uses are not covered by the Statement as they are covered by the existing permissions and the abstraction licence which are being dealt with separately via Southern Water's licence amendments.

These existing uses can only be used to offset new development if they are supplied by public water supply from Sussex North and they are able to reduce ongoing water consumption.

Does the Statement apply to other abstraction licence holders in Sussex North?

Existing abstraction licence holders are not affected by this Statement as they are not using the public water supply abstraction that is contributing to the adverse effect.
Natural England are not aware of any other abstraction licences from the relevant aquifer.

Would non-consumptive use of water be captured by the need for water neutrality e.g., fracking, mineral site pumping, washing gravel, WWTW applications?

Environmental permitting for minerals and waste sites assesses water usage. How do the County Council consider water consumption at the planning and land use stage?

The water neutrality approach applies to all development that uses water from the Sussex North water supply zone and specifically the Pulborough abstractions it is not restricted to new residential dwellings and may include other forms of development that use the public water supply. Whether an application is included would depend on what water supply is chosen. Only development that uses public water supply from Sussex North water supply zone is included in the Statement. Many of the types of development that use water that the County Council permit do not use public water supply and would therefore not be covered by the Statement. It is for the local planning authorities including the County Council to identify which types of development they believe may be captured.

Abstraction licences that take water from another water supply would be assessed in the usual way for the environmental impacts of those abstraction types. Those developments that use public water supply in Sussex North and could therefore add to the risk of adverse effect and may be subject to an appropriate assessment. It is Natural England's advice that any such assessments should consider water neutrality as an important tool to aid determination of no adverse effect on site integrity.

D: SOUTHEN WATER'S LICENCES AND RESPONSIBILITIES

Is anything being done to make the abstraction licences in Sussex North more sustainable and help remove the need for water neutrality?

The Environment Agency is the competent authority with regards to Southern Water's licences. Natural England has been working with the Environment Agency and Southern Water to clarify and reduce the impacts of the licence since 2019 when data first began to emerge that the existing abstraction was a cause for concern. The licences are being reduced voluntarily by the company via a variation to remove any headroom, which limits the ability to increase abstraction from the impactful licence. This process is underway and has been driven by Natural England's work with the Environment Agency.

Natural England and the Environment Agency are helping to ensure that Southern Water does all it can to reduce the use of the licences especially the groundwater licence in the interim period. For example, Southern Water is required to mitigate the impacts of the licence in the short term to try to prevent further deterioration although the risk of adverse effect will not be removed until the long-term water supply is replaced. Natural England is also working with Water Resources South East, Southern Water, and the Environment Agency to encourage Southern Water to move as quickly as possible to the long-term water supply solution. The need to support local planning authorities on water neutrality is also included in the set of measures Natural England are seeking in the licence amendments process.

Why is water neutrality being sought through planning now, when Southern Water has a statutory responsibility to ensure an adequate water supply balance considering future growth?

Southern Water's licence is for existing developments it will continue to supply water to existing users. As set out above it is being amended, minimised, and mitigated to help protect the designated sites. The company is also being encouraged to progress the long-term water supply as rapidly as possible. Since Southern Water has a duty to supply new developments, they do not have power to minimise demand from new developments.

How does water neutrality relate to Southern Water's Target 100 strategy?

Target 100 is a strategy to reduce water consumption in Southern Water's whole water supply area in the long term (not just Sussex North), as set out in their Water Resources Management Plan. Water neutrality only applies to Sussex North water supply zone. Therefore, whilst two strategies to reduce water exist within the single supply zone, the strategy that is being developed is making sure double-counting of water saving measures is avoided and Southern Water are inputting into the water neutrality strategy.

If applicants connect to an alternative supply/provider (SES Water or South East Water) would there still be a need for water neutrality?

If development is not supplied by the abstractions in Sussex North water supply zone that are contributing to the existing risk of adverse effect on integrity, then three would be no need to demonstrate water neutrality.

How can connection to other service provider/water company be secured?

The mechanisms and potential for use of alternative water suppliers is a matter for the water companies, the Environment Agency with Ofwat as the sector regulators.
The process may not be straightforward as the new service provider must have surplus water in their supply demand balance and the water types must be compatible.

What are the long-term water supply alternatives?

The key long term alternative water supply option in Southern Water's Water Resources Management Plan 2019 is a water recycling scheme from a treatment plant near Littlehampton transferred via a new pipeline that would be discharged into the river Rother upstream of the surface water abstraction at Pulborough. This is understood to be scheduled for delivery between 2028 and 2030.

E: DEVELOPMENT CONTROL
DEVELOPMENT CONTROL - GENERAL

Does Natural England consider nature-based solutions an appropriate and acceptable means of offsetting, and if so, is there guidance or examples that can be shared on what/how to secure such offsetting?

Natural England always welcome nature-based solutions to land use challenges. Any proposed nature-based solution for abstraction impacts from growth in Sussex North would need to demonstrably reduce the current water demand from the abstraction or demonstrably provide more good quality groundwater to the peat on the designated sites. Due to the complex hydrogeology of the area in particular the semi-confined nature of the aquifer this may be complex to evidence. Natural England is not currently aware of examples that would apply in this case but will be encouraging Southern Water to undertake nature-based solutions where possible.

Can I just pay an offsetting charge?

Once the water neutrality strategy has been agreed it is hoped that this option will be available.

How does water neutrality relate to draft policies in the Horsham and Crawley Plans asking for 100 l/p/d or 80 l/p/d for strategic development?

The developing strategy will include guidelines for water consumption requirements for new development within Sussex North water supply zone. It is intended that these will be transposed into Policies and accompanying tools within each Local Plan within the Sussex North water supply zone.

Are there other areas of the country that have water neutrality strategies?

This is the first location that Natural England are aware of where water neutrality has been linked to Habitats Regulations requirements. Natural England is working with Defra to confirm whether there are other areas in the country that might have water neutrality issues in the future but there are a range of specific circumstances which have resulted in the need for a water neutrality in the Sussex North water supply zone.

DEVLEOPMENT CONTROL – PREAPPLICATION

Where would a prospective developer start to achieve neutrality?

The first step is to calculate a water budget for the new development.

The second step is to assess if the existing site uses water, subtracting the existing use from the new development budget. This could be evidenced by water bills from historic uses or from the generic assumptions from the water calculator when developed.

The final step would be to identify suitable offsetting and secure this.

A Water Neutrality Statement will be required to support applications. What should this demonstrate and how will it be assessed?

The neutrality statement should include a water budget for each application and should demonstrate how it has achieved overall neutrality, and will, therefore, not add to the existing risk of adverse effect. This is achieved through a combination minimising water use within new developments and offsetting of residual water (identified within the budget). Any scheme will also need to be sufficiently certain if it is to meet the tests set out in the Conservation of Habitats and Species Regulations 2017. Examples of offsetting measures are in Water Neutrality Part A study.

Can NE provide advice for developers e.g., through pre-application advice services or advice on to local planning authorities on water budgets submitted with development?
Natural England is not resourced and has insufficient numbers of people with relevant expertise to undertake this work and it would all be chargeable. Natural England recommends that the development control tools to enable these assessments to be undertaken are developed as part of the strategy work.

DEVELOPMENT CONTROL – CONSIDERATION OF EXISTING USE

How should existing land uses be considered in water neutrality calculations? Can existing uses on sites be made more efficient as a means of offsetting development? For example, where greenfield land is currently subject to irrigation.

Existing water consumption can be used to offset new build in the water budget if it is supplied by Sussex North public water supply. Irrigation of agricultural land is rarely supplied by public water supply and Natural England is not aware of any irrigation boreholes into the Pulborough groundwater aquifer from which Southern Water abstract. It is therefore unlikely that farmland on greenfield would have much offsetting potential for water neutrality.

Where there is a proposed change of use between non-residential uses is it acceptable to calculate the existing water consumption and proposed water consumption using the BREEAM Wat 01 calculation tool, assuming full occupancy for both uses, with a development being 'water neutral' where consumption stays the same or falls?

This is a matter for the LPAs to decide. Any assessment methodology on water consumption for non-residential development must be consistent between authorities across the supply zone but also is consistent with the assumptions for non-residential water consumption used in the calculation of the strategic water budgets. The alternative to using the strategic solution assumptions is to provide evidence from the meter readings from historic use where these are available. The data, for example the use of full occupancy for the historic use needs to be justified by evidence. The most important point to consider in the choice of methodology is to ensure the assumptions applied are sufficiently precautionary to meet the legislative test.

Where a building has been demolished prior to an application for planning permission is it possible to offset the water use of the demolished building against the proposed water use when calculating the net water demand of the development?

This will depend on when the building was last in use and if evidence of recent water consumption (e.g., within the last 3 years) can be provided. If the building has not been in use for many years and has been demolished the use of offsetting is not considered precautionary. It is important to consider the designated sites are already drying and concerns are from actual use not theoretical or licenced amounts.

DEVLEOPMENT CONTROL – OFFSETTING

What types of offsetting measures will/will be acceptable?
Any offsetting that reduces existing water consumption from the Sussex North public water supply can be used provided it is able to meet the following requirements:

- The existing development is supplied by existing supply from Southern Water's Sussex North water supply zone.
- Can provide evidence of consumption (e.g., Water bills/ meter readings or use generic values when these are agreed by LPAs in strategic solution)
- A route to securing the measures is provided and deliverable so that the LPAs are satisfied they are sufficiently certain.
- The reductions are likely to be secured until at least when the long-term water supply alternative will be available.

Types of development that could be used include: (but are not restricted to)

- Offsetting on private occupied property with Southern Water supply in Sussex North
- Offsetting on Council owned property with Southern Water supply in Sussex North
- Offsetting on Registered Provider property with Southern Water supply in Sussex North
- Offsetting on commercial property with Southern Water supply in Sussex

Water efficiency measures can be incorporated into unbuilt developments within the water supply zone where approval was in place prior to the Natural England Position Statement being published on 14th September 2021, and where there is certainty that the unbuilt developments will be built. In cases where these requirements are met, the water efficiency measures can then be used as off-setting for future developments under the Habitat Regulations. The Regulations cannot be applied retrospectively and therefore, there is no requirement for water efficiency measures to be incorporated into these approved developments, so any measures which are put in place can be counted as mitigation. It will be the responsibility of the LPAs to ensure the timings of these developments are compatible with providing the necessary off-setting for the future developments, and that the mitigation measures are appropriately secured and linked to the specific future development it is mitigating, thereby ensuring that the mitigation is delivered before the impact from the specific future development has occurred.

Can I propose a solution to offsetting for my or another development? What if we can collectively provide offsetting?

Yes, these can potentially be secured in order to demonstrate water neutrality subject to LPA approval.

How can offsetting be secured through the planning system?

Water neutrality is best secured by a strategic solution through the local plans using a water budget. That is what local planning authorities are already attempting to undertake and Natural England recommends that all local authorities in Sussex North including the County Council work together on the strategic solution partnership.

When should offsetting be delivered in relation to the development delivery?

Like all forms of mitigation, offsetting should be delivered before the impact from the development has occurred. The pathway for impact is via increased abstraction driven by increased water consumption. The water consumption only occurs on occupancy. It is therefore logical that the offsetting for specific development should occur before occupancy.

What are the short, medium, and long-term approaches to offsetting and how is consistency being considered?

The approach to offsetting is being developed through the strategic solution to the local plans. This is a collaborative approach including Southern Water and all affected LPAs. To be successful the approach should become a delivery partnership with all affected LPAs and the Southern Water.

What are the relevant industry standards against which to judge the efficacy of the offsetting proposed?
Overall, the efficacy of offsetting will be judged on the annual water consumption allowing for weather variations across the water supply zones.

Can private water supply bore holes enable water neutrality when you must have a connection to Southern Water to meet building regulations?
If a proposed abstraction is over 20m3 per day, it will be subject to the usual licensing requirements and assessment of water availability. This will be informed by the abstraction licence strategy for the area. In many cases water availability would be limited. A licence would not be granted if there could be an impact on a protected site. Abstractions of less than 20m3 per day do not need a licence.

A developer would have to consider the reliability of the water supply, the rules for becoming a private water supplier and any water quality requirements. Drinking Water Inspectorate (DWI), Ofwat and the local authority will be able to help with this. Further advice can be found in the DWI Website. https://www.dwi.gov.uk/private-water-supplies/.

This addendum offers advice intended to clarify Natural England's view concerning the areas to which its position statement issued 14 September 2021, together with the advice note dated February 2022 (v2) (together "The Position Statements") **will apply to.**

To which areas does the Position Statement apply?

Based on the best available evidence and the material provided by the Water Companies, the Position Statements should be read as applying to new developments where water abstraction is required from Pulborough as defined by the Water Companies.

Natural England note the water companies' evidence relating to the Pulborough abstraction and LPAs should refer to water company evidence in order to identify those areas to which Natural England's position statement would apply.

The water companies provided evidence in the form of a map in August 2022 which is available on West Sussex County Council's website (see link below):

Water Neutrality map

The Itchingfield Rain Gauge Data is 95 pages long and is not included within this document. The data can be provided upon request, or it can be downloaded from the EA /DEFRA Hydrology Data Explorer.

Appendix D

Appendix E

schedule of accommodation
Rev R

Project Title: Barns Green, Horsham

Client: Miller Homes

Project Ref: 24088
Drawing Ref: P101L
Date: 02/09/25

Plot No.	House Type	House Name	Ref	Type	Tenure	Area ft²	Area m²	Parking
1	4 Bed House	Faverwood	L474	D	Private	1,704	158.3	2.7
2	3 Bed House	Haywood	L454	D	Private	1,130	105.0	2.2
3	3 Bed House	Haywood	L454	D	Private	1,130	105.0	2.2
4	2 Bed House	Denton	L356	SD	Private	907	84.3	1.7
5	2 Bed House	Denton	L356	SD	Private	907	84.3	1.7
6	4 Bed House	Faverwood	L474	D	Private	1,704	158.3	2.7
7	4 Bed House	Beauwood	L467	D	Private	1,379	128.1	2.2
8	3 Bed House	Chilton	L360	SD	Private	997	92.6	2.2
9	3 Bed House	Whitton	L358	SD	Private	947	88.0	2.2
10	2 Bed House	Denton	L356	EOT	Private	907	84.3	1.7
11	2 Bed House	Denton	L356	MT	Private	907	84.3	1.7
12	2 Bed House	Denton	L356	EOT	Private	907	84.3	1.7
13	3 Bed House	Whitton	L358	SD	Private	947	88.0	2.2
14	3 Bed House	Whitton	L358	SD	Private	947	88.0	2.2
15	1 Bed House	Richmont	L250	EOT	Private	625	58.1	1.7
16	1 Bed House	Richmont	L250	MT	Private	625	58.1	1.7
17	1 Bed House	Richmont	L250	EOT	Private	625	58.1	1.7
18	4 Bed House	Briarwood	L470	D	Private	1,419	131.8	2.7
19	5 Bed House	Homesford	L552	D	Private	1,568	145.7	2.7
20	3 Bed House	Braxton	L361	D	Private	996	92.5	2.2
21	4 Bed House	Briarwood	L470	D	Private	1,419	131.8	2.7
22	4 Bed House	Beauwood	L467	D	Private	1,379	128.1	2.7
23	2 Bed House	Baymont	-	EOT	Sh Ownership	850	79.0	1.7
24	2 Bed House	Baymont	-	MT	Sh Ownership	850	79.0	1.7
25	2 Bed House	Baymont	-	EOT	Sh Ownership	850	79.0	1.7
26	3 Bed House	Chilton	L360	SD	Private	997	92.6	2.2
27	3 Bed House	Whitton	L358	SD	Private	947	88.0	2.2
28	3 Bed House	Haywood	L454	D	Private	1,130	105.0	2.2
29	2 Bed House	Denton	L356	SD	Private	907	84.3	1.7
30	2 Bed House	Denton	L356	SD	Private	907	84.3	1.7
31	3 Bed House	Braxton	L361	D	Private	996	92.5	2.2
32	2 Bed Flat	-	-	-	Affordable	753	70.0	1.7
33	2 Bed Flat	-	-	-	Affordable	753	70.0	1.7
34	2 Bed Flat	-	-	-	Affordable	753	70.0	1.7
35	2 Bed Flat	-	-	-	Affordable	753	70.0	1.7
36	2 Bed Flat	-	-	-	Affordable	753	70.0	1.7
37	2 Bed Flat	-	-	-	Affordable	753	70.0	1.7
38	2 Bed House	Baymont	-	EOT	Affordable	850	79.0	1.7
39	2 Bed House	Baymont	-	MT	Affordable	850	79.0	1.7
40	2 Bed House	Baymont	-	EOT	Affordable	850	79.0	1.7
41	3 Bed House	Braxton	L361	D	Private	996	92.5	2.2
42	5 Bed House	Homesford	L552	D	Private	1,568	145.7	2.7
43	4 Bed House	Briarwood	L470	D	Private	1,419	131.8	2.7
44	4 Bed House	Briarwood	L470	D	Private	1,419	131.8	2.7

schedule of accommodation
Rev R

Project Title: Barns Green, Horsham

Client: Miller Homes

Project Ref: 24088
Drawing Ref: P101L
Date: 02/09/25

Plot No.	House Type	House Name	Ref	Type	Tenure	Area ft²	Area m²	Parking
45	5 Bed House	Grayford	L554	D	Private	1,780	165.4	2.7
46	4 Bed House	Faverwood	L474	D	Private	1,704	158.3	2.7
47	2 Bed House	Denton	L356	SD	Private	907	84.3	1.7
48	2 Bed House	Denton	L356	SD	Private	907	84.3	1.7
49	3 Bed House	Lockton	-	SD	Affordable	1,001	93.0	2.2
50	3 Bed House	Lockton	-	SD	Affordable	1,001	93.0	2.2
51	2 Bed House	Baymont	-	SD	Affordable	850	79.0	1.7
52	2 Bed House	Baymont	-	SD	Affordable	850	79.0	1.7
53	4 Bed House	Briarwood	L470	D	Private	1,419	131.8	2.7
54	3 Bed House	Braxton	L361	D	Private	996	92.5	2.2
55	3 Bed House	Haywood	L454	D	Private	1,130	105.0	2.2
56	3 Bed House	Lockton	-	SD	Sh Ownership	1,001	93.0	2.2
57	3 Bed House	Lockton	-	SD	Sh Ownership	1,001	93.0	2.2
58	4 Bed House	Torwood	-	SD	Affordable	1,143	106.2	2.7
59	4 Bed House	Torwood	-	SD	Affordable	1,143	106.2	2.7
60	2 Bed House	Baymont	-	EOT	Affordable	850	79.0	1.7
61	2 Bed House	Baymont	-	EOT	Affordable	850	79.0	1.7
62	3 Bed House	Lockton	-	SD	Sh Ownership	1,001	93.0	1.7
63	3 Bed House	Lockton	-	SD	Sh Ownership	1,001	93.0	1.7
64	3 Bed House	Whitton	L358	SD	Private	947	88.0	2.2
65	3 Bed House	Whitton	L358	SD	Private	947	88.0	2.2
66	3 Bed House	Braxton	L361	D	Private	996	92.5	2.7
67	3 Bed House	Haywood	L454	D	Private	1,130	105.0	2.2
68	3 Bed House	Haywood	L454	D	Private	1,130	105.0	2.2
Total						70,665	6,460.0	142

Visitor parking	14
Total	156

All figures are approximate and have been calculated in accordance with the description of Net Sales Area (NSA) on page 32 of the RICS guidance note Code of Measuring Practice 6th Edition, May 2015 (republished January 2018). Figures relate to the current stage of the project and any development decisions to be made on the basis of this information should include due allowance for the increases and decreases inherent in the design and building processes.

schedule of accommodation
Rev R

Project Title: Barns Green, Horsham

Client: Miller Homes

Project Ref: 24088
Drawing Ref: P101L
Date: 02/09/25

Affordable Summary					
House Type	House Name	Reference	Area ft²	No. units	Total Area ft²
2 Bed Flat	-	-	753	6	4,518
2 Bed House	Baymont	-	850	7	5,950
3 Bed House	Lockton	-	1,001	2	2,002
4 Bed House	Torwood	-	1,143	2	2,286
				17	14,756
Shared Ownership Sumary					
House Type	House Name	Reference	Area ft²	No. units	Total Area ft²
2 Bed House	Baymont	-	850	3	2,550
3 Bed House	Lockton	-	1001	4	4,004
				7	6,554
Private Summary					
House Type	House Name	Reference	Area ft²	No. units	Total Area ft²
1 Bed House	Richmont	L250	625	3	1,875
2 Bed House	Denton	L356	907	9	8,163
3 Bed House	Whitton	L358	947	6	5,682
3 Bed House	Chilton	L360	997	2	1,994
3 Bed House	Braxton	L361	996	5	4,980
3 Bed House	Haywood	L459	1,130	6	6,780
4 Bed House	Beauwood	L467	1,379	2	2,758
4 Bed House	Briarwood	L470	1,419	5	7,095
5 Bed House	Homesford	L552	1,568	2	3,136
4 Bed House	Faverwood	L474	1,704	3	5,112
5 Bed House	Grayford	L554	1,780	1	1,780
				44	49,355
Total				68	70,665

All figures are approximate and have been calculated in accordance with the description of Net Sales Area (NSA) on page 32 of the RICS guidance note Code of Measuring Practice 6th Edition, May 2015 (republished January 2018). Figures relate to the current stage of the project and any development decisions to be made on the basis of this information should include due allowance for the increases and decreases inherent in the design and building processes.

Appendix F

Table A1: The water efficiency calculator					
		(1)	(2)	(3)	(4)
Installation Typle	**Unit of measure**	**Capacity/flow rate**	**Use factor**	**Fixed use (litres/person/day)**	**Litres/person/day [(1)x(2)x(3)]**
WC Single Flush	Flush Volume (litres)	0	4.42	0.00	0.00
WC Dual Flush	Full Flush Volume (litres)	4	1.46	0.00	5.84
	Part Flush Volume (litres)	2.6	2.96	0.00	7.70
Taps (excluding kitchen/utility)	Flow rate (litres/min)	5	1.58	1.58	9.48
Bath (where shower present)	Capacity to overflow (litres)	139	0.11	0.00	15.29
Shower (where bath present)	Flow rate (litres/min)	8	4.37	0.00	34.96
Bath Only	Capacity to overflow (litres)	0	0.50	0.00	0.00
Shower Only	Flow rate (litres/min)	0	5.60	0.00	0.00
Kitchen Taps	Flow rate (litres/min)	6	0.44	10.36	13.00
Washing Machine	Litres/kg dry load	6.29	2.10	0.00	13.21
Dishwasher	Litres/place setting	0.76	3.60	0.00	2.74
	(5)			**Total calculated use = (Sum column 4)**	**102.21**
	(6)	Contribution from greywater (litres/person/day) Table 4.6			**0.00**
	(7)	Contribution from rainwater harvesting (litres/person/day) Table 5.5			**31.75**
	(8)	Normalisation Factor			0.91
	(9)	Total water consumption = [(5) - (6) - (7)] x (8)			**64.12**
	(10)	External Water Use (Part G requires 5 L/per/d however there is sufficient from RWH)			5.00
	(11)			**Total water consumption = (9) + (10) (litres/person/day)**	**69.12**

Table A5.1: Rainwater collection calculation	
(a) Collection Area (m2)	3626.1
(b) Yield coefficient and hydraulic filter efficiency	0.7
(c) Rainfall (average mm/year)	771
(d) Daily Rainfall collection (litres) = [(a) x (b) x (c)]/365	5361.7
(e) Number occupants	144.91
(f) Daily rainwater per person (litres)	37.00

Table A5.5: Rainwater saving calculations for new	
	(litres/person/day)
(a) Rainwater coleected	37.00
(b) Rainwater demand	31.75
(c) Rainwater savings	31.75

Appendix G

Part G Contribution from Rainwater Harvesting	(Pd)	ltr/per/day	31.75
Standard Average Annual Rainfall	(SAAR)	mm	771
Yield Coefficient	e		0.8
Hydraulic Filter Coefficient	h	mm	0.9

													Yield Potential			Demand		*Horsham require 35-days (or 9.6% of 1-year) drought storage, therefore the tank size is equivalent to the 9.6% DN Demand (i)		Klargester	
								(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)				
Plot No.	House Type	House Name	Bedrooms	Average Occupancy	Pd	House Roof Area	Garage Roof Area	Total Roof Area	Rainwater Collection Area	Annual Average Rainfall	e	h	Average Daily Yield	9.6% Year (35-day drought)	9.6% Year (35-day drought)	9.6% DN (35-day drought)	9.6% DN (35-day drought)	Rainwater Harvesting Suitability	Minimum Storage Requirement	AquaHarvest	
				(persons)	(l/day)	(m^2)	(m^2)	(m^2)	(m^2)	(mm)			(l/d) (ia)x(b)x(c)x(d)/365	(l/annum) ((a)x(b)x(c)x(d))*(9.6%)	(m^3/annum) (f/1000)	(l/annum) ((Pd)x365)*(9.6%)	(m^3/annum) (h/1000)	YES / NO	(m^3)		
1	4 Bed House	Faverwood	4	2.86	90.81	93.6	40.3	133.9	133.9	771	0.8	0.9	181.02	7135.73	7.14	3181.81	3.18	YES	3.18	4600	GRW160DKSW
2	3 Bed House	Haywood	3	2.47	78.42	63.8	19.9	83.7	83.7	771	0.8	0.9	113.15	4460.50	4.46	2747.92	2.75	YES	2.75	3100	GRW110DKSW
3	3 Bed House	Haywood	3	2.47	78.42	63.8	19.9	83.7	83.7	771	0.8	0.9	113.15	4460.50	4.46	2747.92	2.75	YES	2.75	3100	GRW110DKSW
4	2 Bed House	Denton	2	1.88	59.69	50.7	0	50.7	50.7	771	0.8	0.9	68.54	2701.88	2.70	2091.54	2.09	YES	2.09	2350	GRW080DKSW
5	2 Bed House	Denton	2	1.88	59.69	50.7	0	50.7	50.7	771	0.8	0.9	68.54	2701.88	2.70	2091.54	2.09	YES	2.09	2350	GRW080DKSW
6	4 Bed House	Faverwood	4	2.86	90.81	93.6	53.1	146.7	146.7	771	0.8	0.9	198.32	7817.87	7.82	3181.81	3.18	YES	3.18	4600	GRW160DKSW
7	4 Bed House	Beauwood	4	2.86	90.81	75.3	22.1	97.4	97.4	771	0.8	0.9	131.67	5190.59	5.19	3181.81	3.18	YES	3.18	4600	GRW160DKSW
8	3 Bed House	Chilton	3	2.47	78.42	55.9	0	55.9	55.9	771	0.8	0.9	75.57	2979.00	2.98	2747.92	2.75	YES	2.75	3100	GRW110DKSW
9	3 Bed House	Whitton	3	2.47	78.42	52.6	0	52.6	52.6	771	0.8	0.9	71.11	2803.13	2.80	2747.92	2.75	YES	2.75	3100	GRW110DKSW
10	2 Bed House	Denton	2	1.88	59.69	50.7	0	50.7	50.7	771	0.8	0.9	68.54	2701.88	2.70	2091.54	2.09	YES	2.09	2350	GRW080DKSW
11	2 Bed House	Denton	2	1.88	59.69	48.7	0	48.7	48.7	771	0.8	0.9	65.84	2595.30	2.60	2091.54	2.09	YES	2.09	2350	GRW080DKSW
12	2 Bed House	Denton	2	1.88	59.69	50.7	0	50.7	50.7	771	0.8	0.9	68.54	2701.88	2.70	2091.54	2.09	YES	2.09	2350	GRW080DKSW
13	3 Bed House	Whitton	3	2.47	78.42	52.6	0	52.6	52.6	771	0.8	0.9	71.11	2803.13	2.80	2747.92	2.75	YES	2.75	3100	GRW110DKSW
14	3 Bed House	Whitton	3	2.47	78.42	52.6	0	52.6	52.6	771	0.8	0.9	71.11	2803.13	2.80	2747.92	2.75	YES	2.75	3100	GRW110DKSW
15	1 Bed House	Richmont	1	1.32	41.91	36.2	0	36.2	36.2	771	0.8	0.9	48.94	1929.15	1.93	1468.53	1.47	YES	1.47	2350	GRW080DKSW
16	1 Bed House	Richmont	1	1.32	41.91	34.8	0	34.8	34.8	771	0.8	0.9	47.05	1854.54	1.85	1468.53	1.47	YES	1.47	2350	GRW080DKSW
17	1 Bed House	Richmont	1	1.32	41.91	36.2	0	36.2	36.2	771	0.8	0.9	48.94	1929.15	1.93	1468.53	1.47	YES	1.47	2350	GRW080DKSW
18	4 Bed House	Briarwood	4	2.86	90.81	78.2	22.1	100.3	100.3	771	0.8	0.9	135.59	5345.14	5.35	3181.81	3.18	YES	3.18	4600	GRW160DKSW
19	5 Bed House	Homesford	5	3.09	98.11	89.2	22.1	111.3	111.3	771	0.8	0.9	150.47	5931.35	5.93	3437.69	3.44	YES	3.44	4600	GRW160DKSW
20	3 Bed House	Braxton	3	2.47	78.42	56.6	0	56.6	56.6	771	0.8	0.9	76.52	3016.30	3.02	2747.92	2.75	YES	2.75	3100	GRW110DKSW
21	4 Bed House	Briarwood	4	2.86	90.81	78.2	19.9	98.1	98.1	771	0.8	0.9	132.62	5227.90	5.23	3181.81	3.18	YES	3.18	4600	GRW160DKSW
22	4 Bed House	Beauwood	4	2.86	90.81	75.3	19.9	95.2	95.2	771	0.8	0.9	128.70	5073.35	5.07	3181.81	3.18	YES	3.18	4600	GRW160DKSW
23	2 Bed House	Baymont	2	1.88	59.69	47.9	0	47.9	47.9	771	0.8	0.9	64.76	2552.66	2.55	2091.54	2.09	YES	2.09	2350	GRW080DKSW
24	2 Bed House	Baymont	2	1.88	59.69	46.2	0	46.2	46.2	771	0.8	0.9	62.46	2462.07	2.46	2091.54	2.09	YES	2.09	2350	GRW080DKSW
25	2 Bed House	Baymont	2	1.88	59.69	47.9	0	47.9	47.9	771	0.8	0.9	64.76	2552.66	2.55	2091.54	2.09	YES	2.09	2350	GRW080DKSW
26	3 Bed House	Chilton	3	2.47	78.42	55.9	0	55.9	55.9	771	0.8	0.9	75.57	2979.00	2.98	2747.92	2.75	YES	2.75	3100	GRW110DKSW
27	3 Bed House	Whitton	3	2.47	78.42	52.6	0	52.6	52.6	771	0.8	0.9	71.11	2803.13	2.80	2747.92	2.75	YES	2.75	3100	GRW110DKSW
28	3 Bed House	Haywood	3	2.47	78.42	63.8	22.1	85.9	85.9	771	0.8	0.9	116.13	4577.74	4.58	2747.92	2.75	YES	2.75	3100	GRW110DKSW
29	2 Bed House	Denton	2	1.88	59.69	50.7	0	50.7	50.7	771	0.8	0.9	68.54	2701.88	2.70	2091.54	2.09	YES	2.09	2350	GRW080DKSW
30	2 Bed House	Denton	2	1.88	59.69	50.7	0	50.7	50.7	771	0.8	0.9	68.54	2701.88	2.70	2091.54	2.09	YES	2.09	2350	GRW080DKSW
31	3 Bed House	Braxton	3	2.47	78.42	56.6	0	56.6	56.6	771	0.8	0.9	76.52	3016.30	3.02	2747.92	2.75	YES	2.75	3100	GRW110DKSW
32	2 Bed Flat	-	2	1.88	358.14	270.6	0	270.6	270.6	771	0.8	0.9	365.82	14420.69	14.42	12549.23	12.55	YES	4.18	4600	GRW160DKSW
33	2 Bed Flat	-	2	1.88																	
34	2 Bed Flat	-	2	1.88															4.18	4600	GRW160DKSW
35	2 Bed Flat	-	2	1.88																	
36	2 Bed Flat	-	2	1.88															4.18	4600	GRW160DKSW
37	2 Bed Flat	-	2	1.88																	
38	2 Bed House	Baymont	2	1.88	59.69	47.9	0	47.9	47.9	771	0.8	0.9	64.76	2552.66	2.55	2091.54	2.09	YES	2.09	2350	GRW080DKSW
39	2 Bed House	Baymont	2	1.88	59.69	46.2	0	46.2	46.2	771	0.8	0.9	62.46	2462.07	2.46	2091.54	2.09	YES	2.09	2350	GRW080DKSW
40	2 Bed House	Baymont	2	1.88	59.69	47.9	0	47.9	47.9	771	0.8	0.9	64.76	2552.66	2.55	2091.54	2.09	YES	2.09	2350	GRW080DKSW
41	3 Bed House	Braxton	3	2.47	78.42	56.6	0	56.6	56.6	771	0.8	0.9	76.52	3016.30	3.02	2747.92	2.75	YES	2.75	3100	GRW110DKSW
42	5 Bed House	Homesford	5	3.09	98.11	89.2	40.3	129.5	129.5	771	0.8	0.9	175.07	6901.25	6.90	3437.69	3.44	YES	3.44	4600	GRW160DKSW
43	4 Bed House	Briarwood	4	2.86	90.81	78.2	19.9	98.1	98.1	771	0.8	0.9	132.62	5227.90	5.23	3181.81	3.18	YES	3.18	4600	GRW160DKSW
44	4 Bed House	Briarwood	4	2.86	90.81	78.2	19.9	98.1	98.1	771	0.8	0.9	132.62	5227.90	5.23	3181.81	3.18	YES	3.18	4600	GRW160DKSW
45	5 Bed House	Grayford	5	3.09	98.11	97.9	40.3	138.2	138.2	771	0.8	0.9	186.83	7364.89	7.36	3437.69	3.44	YES	3.44	4600	GRW160DKSW
46	4 Bed House	Faverwood	4	2.86	90.81	93.6	40.3	133.9	133.9	771	0.8	0.9	181.02	7135.73	7.14	3181.81	3.18	YES	3.18	4600	GRW160DKSW
47	2 Bed House	Denton	2	1.88	59.69	50.7	0	50.7	50.7	771	0.8	0.9	68.54	2701.88	2.70	2091.54	2.09	YES	2.09	2350	GRW080DKSW
48	2 Bed House	Denton	2	1.88	59.69	50.7	0	50.7	50.7	771	0.8	0.9	68.54	2701.88	2.70	2091.54	2.09	YES	2.09	2350	GRW080DKSW
49	3 Bed House	Lockton	3	2.47	78.42	55.4	0	55.4	55.4	771	0.8	0.9	74.89	2952.35	2.95	2747.92	2.75	YES	2.75	3100	GRW110DKSW
50	3 Bed House	Lockton	3	2.47	78.42	55.4	0	55.4	55.4	771	0.8	0.9	74.89	2952.35	2.95	2747.92	2.75	YES	2.75	3100	GRW110DKSW
51	2 Bed House	Baymont	2	1.88	59.69	47.9	0	47.9	47.9	771	0.8	0.9	64.76	2552.66	2.55	2091.54	2.09	YES	2.09	2350	GRW080DKSW
52	2 Bed House	Baymont	2	1.88	59.69	47.9	0	47.9	47.9	771	0.8	0.9	64.76	2552.66	2.55	2091.54	2.09	YES	2.09	2350	GRW080DKSW
53	4 Bed House	Briarwood	4	2.86	90.81	78.2	22.1	100.3	100.3	771	0.8	0.9	135.59	5345.14	5.35	3181.81	3.18	YES	3.18	4600	GRW160DKSW
54	3 Bed House	Braxton	3	2.47	78.42	56.6	0	56.6	56.6	771	0.8	0.9	76.52	3016.30	3.02	2747.92	2.75	YES	2.75	3100	GRW110DKSW
55	3 Bed House	Haywood	3	2.47	78.42	63.8	19.9	83.7	83.7	771	0.8	0.9	113.15	4460.50	4.46	2747.92	2.75	YES	2.75	3100	GRW110DKSW
56	3 Bed House	Lockton	3	2.47	78.42	55.4	0	55.4	55.4	771	0.8	0.9	74.89	2952.35	2.95	2747.92	2.75	YES	2.75	3100	GRW110DKSW
57	3 Bed House	Lockton	3	2.47	78.42	55.4	0	55.4	55.4	771	0.8	0.9	74.89	2952.35	2.95	2747.92	2.75	YES	2.75	3100	GRW110DKSW
58	4 Bed House	Torwood	4	2.86	90.81	62.5	0	62.5	62.5	771	0.8	0.9	84.49	3330.72	3.33	3181.81	3.18	YES	3.18	4600	GRW160DKSW
59	4 Bed House	Torwood	4	2.86	90.81	62.5	0	62.5	62.5	771	0.8	0.9	84.49	3330.72	3.33	3181.81	3.18	YES	3.18	4600	GRW160DKSW
60	2 Bed House	Baymont	2	1.88	59.69	47.9	0	47.9	47.9	771	0.8	0.9	64.76	2552.66	2.55	2091.54	2.09	YES	2.09	2350	GRW080DKSW
61	2 Bed House	Baymont	2	1.88	59.69	47.9	0	47.9	47.9	771	0.8	0.9	64.76	2552.66	2.55	2091.54	2.09	YES	2.09	2350	GRW080DKSW
62	3 Bed House	Lockton	3	2.47	78.42	55.4	0	55.4	55.4	771	0.8	0.9	74.89	2952.35	2.95	2747.92	2.75	YES	2.75	3100	GRW110DKSW
63	3 Bed House	Lockton	3	2.47	78.42	55.4	0	55.4	55.4	771	0.8	0.9	74.89	2952.35	2.95	2747.92	2.75	YES	2.75	3100	GRW110DKSW
64	3 Bed House	Whitton	3	2.47	78.42	52.6	0	52.6	52.6	771	0.8	0.9	71.11	2803.13	2.80	2747.92	2.75	YES	2.75	3100	GRW110DKSW
65	3 Bed House	Whitton	3	2.47	78.42	52.6	0	52.6	52.6	771	0.8	0.9	71.11	2803.13	2.80	2747.92	2.75	YES	2.75	3100	GRW110DKSW
66	3 Bed House	Braxton	3	2.47	78.42	56.6	0	56.6	56.6	771	0.8	0.9	76.52	3016.30	3.02	2747.92	2.75	YES	2.75	3100	GRW110DKSW
67	3 Bed House	Haywood	3	2.47	78.42	63.8	19.9	83.7	83.7	771	0.8	0.9	113.15	4460.50	4.46	2747.92	2.75	YES	2.75	3100	GRW110DKSW
68	3 Bed House	Haywood	3	2.47	78.42	63.8	19.9	83.7	83.7	771	0.8	0.9	113.15	4460.50	4.46	2747.92	2.75	YES	2.75	3100	GRW110DKSW
			Total	156.3	4962.53	3957.00	503.90	4460.9	4460.90												

Appendix H

SNWCS Applicant User Guide

July 2025

This document provides guidance to applicants seeking to use the Sussex North Water Certification Scheme (SNWCS), formerly the Sussex North Offsetting Water Scheme (SNOWS), to meet the water neutrality requirements for their development imposed by Natural England's Water Neutrality Position Statement. It provides an overview of which developments can request SNWCS certification and how these will be prioritised, how to apply for SNWCS certification, information requirements for planning applications and SNWCS applications, how the SNWCS process works and associated deadlines, and the one-off cost for SNWCS certification.

Further information and guidance about SNWCS is available via the SNWCS web page. You can also contact the SNWCS team via SNWCS@horsham.gov.uk.

This guidance relates only to the SNWCS application process. If you have any queries related to the planning application process and water neutrality, we recommend that you refer to FAQs on Horsham District Council's website and/or contact your local planning department directly.

Contents

Applications eligible to access SNWCS

Our definition for the applications that are eligible to access SNWCS is provided below.

If your application meets this definition, you are open to requesting SNWCS certification during the planning application process.

If you application does not meet this definition, you cannot request SNWCS certification and will need to find an alternative solution to meet your application's water neutrality requirements.

If you are unsure whether your application meets the SNWCS eligibility criteria, please contact the local authority Development Management team relevant to your application, who will be able to provide you with further advice.

Applications submitted via West Sussex County Council's (WSCC) Regulation 3 process (for infrastructure related development) will follow a different SNWCS process offering secured access. If your application will be submitted as Regulation 3, please discuss SNWCS access with the Development Management team at WSCC.

SNWCS eligibility criteria
Applicants will be able to request Sussex North Water Certification Scheme (SNWCS) certification for their development's water offsetting needs, unless it is:

1. Development where the principle is not in accordance with:
    a) an adopted or a post-submission local plan; or
    b) a made or post-examination neighbourhood plan

All of the documents/sites referred to in a) & b) above have informed the preparation of Southern Water's Water Resources Management Plan 2024 calculations of water demand.

Non-qualifying development includes:

- housing development outside settlement boundaries on unallocated sites;
- employment development on unallocated sites and/or outside of existing employment sites (unless supported by economic planning policies); or
- development not otherwise accepted in-principle by way of specific development plan policies – such policies include:
    - retirement and specialist care,
    - gypsy and traveller sites,
    - tourism,
    - and some minerals and waste development

and/or

2. Development permitted by virtue of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or as subsequently amended) (GPDO)*

    ***** *Excluding applications submitted to SNWCS for development by a local authority (as defined in Schedule 2, Part 12 of the GDPO)*

Outline planning applications

Applications will only be allocated to available capacity in SNWCS following Full or Reserved Matters approval. Applications will not be allocated to available SNWCS capacity following approval of Outline planning applications.

Outline sites intending to use SNWCS will need to request access at the Outline application stage, as long as they meet the SNWCS eligibility criteria, but SNWCS capacity will not be allocated until Reserved Matters applications linked to the Outline application are submitted.

When to apply for SNWCS certification

Currently, you can only request access to SNWCS at the planning application stage by indicating in your Water Neutrality Statement that you wish to access SNWCS to cover your application's planned water use. Your application must meet the SNWCS eligibility criteria.

Once the SNWCS team is consulted with your application by the relevant local authority Development Management team, we will contact you directly to discuss your SNWCS access.

SNWCS information to submit with planning applications

Any information to support your SNWCS application should be included in the Water Neutrality Statement (WNS) submitted with your planning application. Any requirements listed below are in addition to any requirements set by the relevant Development Management team for information to be included in any WNS.

You will need to provide a value in litres per day (l/d) for the planned water use of the application, which includes all internal and external water use. The SNWCS team will round this value up to the nearest litre for SNWCS certification. This will allow us to determine the SNWCS allocation you require and your one-off cost for SNWCS certification. Development Management case officers will not consult SNWCS until these planned water use figures are finalised.

We will also require the contact details, at least a contact name and e-mail address, of the person we should contact to initiate the SNWCS application process.

To support the prioritisation of your application for SNWCS access, you should also make the information below readily available for SNWCS your WNS. Further details can be found in the application prioritisation section of this guide.

- The water efficiency achieved on-site for your development (in litres per person per day for residential applications and BREEAM WAT01 category credits for non-residential applications, where possible).
- The policy compliance of any affordable housing element of the proposal, including delivery of affordable housing or a financial contribution towards affordable housing (where applicable) *(for residential applications only)*.
- If your application provides community services or other infrastructure supporting development *(for non-residential applications only)*.

SNWCS application process and deadlines

The SNWCS application process works in the following way:

1. A planning application is submitted to the relevant local authority Development Management (DM) team, including a Water Neutrality Statement (WNS) that indicates an intention to use SNWCS to cover the application's planned water use. To support the SNWCS application process, the WNS should include the information identified in the previous section of this guide.

2. Your DM case officer will assess and validate the information submitted in your application and WNS. Once the case officer is satisfied with the water neutrality information submitted, they will

prepare an Appropriate Assessment (AA) as part of the Habitats Regulations requirements. The case officer will consult Natural England and SNWCS with the AA.

3. Once SNWCS receives the consultation from the relevant DM team, we will log the application details into our central SNWCS register. We will then score your application using our prioritisation system. This score will determine your application's place in our prioritisation queue. We will assess whether your application can secure SNWCS certification depending on the current capacity within SNWCS.

4. If your application can access SNWCS, we will write to you setting out our access offer and we will advise your DM case officer that your application is able to access SNWCS. If your application cannot access SNWCS at the current time, we will write to you and your DM case officer to advise. Your application will remain in the prioritisation queue as long as the planning application remains live and should the access availability position change, we will notify you and your DM case officer.

5. Our offer letter for SNWCS access will include the SNWCS allocation required for your application (your on-site water usage in litres per day) and the one-off cost for SNWCS certification. The letter will set out the next steps of the application process and our terms & conditions will be included. The letter will also detail the documentation you will be required to send to SNWCS to comply with money laundering checks (see also the money laundering information for SNWCS applications section below). You are required to confirm your acceptance of the terms set out to secure your access to SNWCS – we must receive this within **14 days** of the date of the offer letter, otherwise your access request will be forfeited, and your access allocation will be offered to another application.

6. Once you have confirmed your SNWCS access, we will send you a letter to confirm your access. This will include an invoice for the payment for your SNWCS certification charge, which will be a one-off payment for your application's certification. This invoice must only be paid after you have received planning permission for your application.

7. The confirmation letter will also advise that you must secure your planning permission within **6 months** from the date of confirming your SNWCS access. If this time limit is approaching and you have not secured your permission, we recommend you speak to your DM case officer to liaise with the SNWCS team. However, in most cases, if you have not secured planning permission within 6 months, your access request will be forfeited, and your access allocation will be offered to another application.

8. Once you have secured planning permission for your application, you must pay the invoice for your SNWCS certification charge within **12 weeks**. Failure to pay the invoice in time risks your access request being forfeited and your access allocation offered to another application.

9. After we receive the payment for your SNWCS certification, we will send you a Final SNWCS Certificate which will indicate that your application can be constructed in line with Habitats Regulations requirements. You can use this final certificate to discharge the SWNCS (or SNOWS) obligations of a water neutrality condition on a planning permission.

SNWCS certification charge

To secure access to SNWCS to meet your application's planned water use, you will need to pay a one-off SNWCS certification charge, calculated at £0.80 (80p) per litre per day for the planned water use of the development.

For example, for an application for a single dwelling constructed with a water efficiency standard of 85 litres per person per day, at an average occupancy rate of 2.5, the total cost for SNWCS certification would be a one-off payment of £170.

Water use per person per day	x	Occupancy	x	Cost per litre	=	**Total cost**
85	x	2.5	x	0.80	=	**£170.00**

Money laundering checks – information to be provided

As part of your SNWCS application, you will need to provide the information below prior to or at the same time as paying your SNWCS certification charge invoice to enable us to carry out necessary money laundering checks, unless you have previously used SNWCS in the last 5 years. We recommend providing this information to us as soon as possible in the SNWCS application process to minimise any delays. This information can be sent to us, or we can be reached for further queries, via SNWCS@horsham.gov.uk. We strongly recommend sending any personal or sensitive information to us in an encrypted format. For further information about how we use your information, please refer to Horsham DC's Strategic Planning Privacy Notice.

- **Public sector body:** Signed, written instructions on headed paper.
- **Non-public sector business:** We will undertake our own checks but may request further information from you if necessary.
- **Individual:** Identification/s showing your name, permanent address, and date and place of birth, for example a passport, driving licence, utility bill etc.

Application prioritisation for SNWCS access

Below is a summary of the criteria that will be used as part of the SNWCS application prioritisation scoring.

- **Criteria 1:** Whether the application is affected by the *C G Fry* court decision. Applications that are affected may receive greater weighting.
- **Criteria 2:** Whether the application is a local authority 'corporate priority', which includes schemes in council plans or those approved by the council's political leadership. These will be given greater weighting.
- **Criteria 3:** The extent to which water efficiency measures have been included in the application to maximise on-site water savings and minimise on-site water usage. Applications that minimise their on-site water use will be given greater weighting.
- **Criteria 4 (residential applications only):** Whether the application is delivering affordable housing units, or where applicable a financial contribution towards affordable housing. Applications delivering 100% affordable schemes made by registered or approved affordable housing providers will be given greatest weighting. Applications must deliver affordable housing units, or make a financial contribution towards affordable housing, to achieve any weighting.
- **Criteria 5 (non-residential applications only):** Whether the application provides community services or other infrastructure supporting development*. These applications will be given a greater weighting.

  * *Applications exclusively or primarily providing development essential for community services or contributing to the construction of essential infrastructure, such as educational facilities, medical facilities, community facilities, or minerals & waste development.*