**From:** SM-NE-Consultations (NE) [redacted]
**Sent:** 05 August 2025 09:07
**To:** Planning
**Subject:** NE Response 519773 - DC/25/0857 Pear Tree Farm Furners Lane Woodmancote West Sussex BN5 9HX
**Attachments:** ufm4_Water_Neutrality_consult.pdf; DC-25-0857 SNOWS approval.docx; pear tree.pdf

**Categories:** Consultations

Dear Sir/Madam

**Our ref: 519773**
**Your ref: DC/25/0857**

Planning consultation: Variation of conditions 8,9, 10 and 11 of DC/21/1796
Location: Pear Tree Farm Furners Lane Woodmancote West Sussex BN5 9HX

Thank you for your consultation.

**Arun Valley SPA, SAC and Ramsar – Water Neutrality**
Natural England notes that your authority, as competent authority, has undertaken an appropriate assessment of the proposal in accordance with regulation 63 of the Conservation of Species and Habitats Regulations 2017 (as amended). Natural England is a statutory consultee on the appropriate assessment stage of the Habitats Regulations Assessment process.

Your appropriate assessment concludes that your authority is able to ascertain that the proposal will not result in adverse effects on the integrity of any of the sites in question. Having considered the assessment, and the measures proposed to mitigate for all identified adverse effects that could potentially occur as a result of the proposal, Natural England advises that we concur with the assessment conclusions, providing that all mitigation measures are appropriately secured in any planning permission given.

Based on the above, Natural England currently has no objection to make on the variation of conditions 8,9, 10 and 11.

If any of the conditions relate to protected species, please note the following:

We have not assessed this application and associated documents for impacts on protected species.

Natural England has produced standing advice[1] to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again. Before sending us any further consultations

regarding this development, please assess whether the changes proposed will materially affect any of the advice we have previously offered. If they are unlikely to do so, please do not re-consult us.

Yours faithfully

**Shannon Bowes** (She/Her)
Higher Officer - National Operations & Delivery
Central Casework Team

Natural England
Hornbeam House, Electra Way
Crewe Business Park
Crewe, Cheshire CW1 6GJ

**Email**: consultations@naturalengland.org.uk
**Website**: www.gov.uk/natural-england

**We strongly recommend using the SSSI Impact Risk Zones (SSSI IRZs) to decide when to consult Natural England on development proposals that might affect a SSSI. The SSSI IRZs tool is quick and simple to use and gives instant planning advice as a formal consultation response in certain circumstances and can reduce unnecessary delays in the planning process.**

**Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.**

For further information on the Discretionary Advice Service see here
For further information on the Pre-submission Screening Service see here

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**From:** planning@horsham.gov.uk <planning@horsham.gov.uk>
**Sent:** 15 July 2025 16:38
**To:** SM-NE-Consultations (NE) [redacted]
**Subject:** Planning Application Water Neutrality Consultation - DC/25/0857

Please see the attached consultation letter regarding Water Neutrality from Horsham District Council Re:DC/25/0857

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[1] https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals

**T is a sHorsham District Council**
**Habitats Regulations Assessment (HRA) Screening Matrix and Appropriate Assessment**

**PLEASE NOTE: This screening relates only for potential impacts from water resources on the Arun Valley SAC/ SPA/Ramsar sites and does not consider impacts on any other designated habitat sites. A separate HRA screening will be required for development affecting other SPAs, SACs, or Ramsar sites.**

**It is the responsibility of the Competent Authority (in this case Horsham District Council) to prepare a HRA report and it is the responsibility of the applicant to provide information to support this process.**

**This HRA Appropriate Assessment template is for use where a planning application will result in additional demand for mains water being created in the Sussex North Water Supply Zone that is predicted to adversely impact the Arun Valley SAC/ SPA/Ramsar sites.**

The purpose of this HRA screening record is to assess the need for appropriate assessment in relation to the project detailed below.

The Conservation of Habitats and Species Regulations 2017 (as amended) requires that a Habitats Regulations Assessment screening is carried out in relation to any plan or project which is likely to have a significant effect on Habitats (European) sites, either alone or in combination with other plans or projects. Habitats sites are Special Protection Areas and Special Areas of Conservation. Ramsar sites should also be given the same level of protection, as stated within the National Planning Policy Framework.

In line with the Court judgement (CJEU *People Over Wind v Coillte Teoranta* C-323/17), mitigation measures cannot be taken into account when carrying out a screening assessment to decide whether a development is likely to result in significant effects on a Habitats site.

Where an Appropriate Assessment is carried out a project may only be authorised after having ascertained that it will not adversely affect the integrity of the site(s) concerned.

**Table 1: HRA Screening matrix for water neutrality**

| Stage 1 HRA screening | |
|---|---|
| Brief description of the development project | **DC/25/0857**<br><br>Pear Tree Farm<br>Furners Lane<br>Woodmancote<br>West Sussex<br>BN5 9HX<br><br>Full Planning<br><br>*Removal of condition 8, 9, 10 and 11 of previously approved application reference DC/21/1796 (Proposed settled gypsy accommodation site comprising 5 pitches and associated utility buildings) to allow updated approach to water neutrality.* |

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| Details of the development project | **Proximity to Arun Valley SAC / SPA / Ramsar**:<br>Is the application site:<br>A) Within the Sussex North Water Supply Zone (WSZ)<br>**Yes**<br><br>B) Arun Valley SAC / SPA / Ramsar potentially impacted by the planning application:<br>**Yes there is credible evidence of a real risk that the proposal will, without measures to minimise water use and water offsetting, result in an increase in water demand.**<br><br>C) Is the planning application directly connected with or necessary to the management of the Arun Valley SAC/SPA/Ramsar site? **No** |
| Brief description of the Habitats sites within scope of this assessment | Arun Valley SAC, SPA and Ramsar site supports rare and diverse plant, invertebrate and bird assemblages as qualifying features. It consists of low-lying grazing marsh, largely on alluvial soils, but with an area of peat derived from a relict raised bog. Variation in soils and water supply lead to a wide range of ecological conditions and hence a rich flora and fauna.<br><br>Further details are provided in Appendix 1. |
| Key vulnerabilities / factors affecting site integrity | For applications where increased demand for water resources is the only pathway for impacts, Natural England's substantive advice (Position Statement Interim Approach, September 2021) is that such applications - without mitigation - will result in a likely significant effect on the Arun Valley SAC/SPA/Ramsar site either alone or in combination with other developments in the Sussex North WSZ. As it cannot be concluded that the existing abstraction within Sussex North Water Supply Zone is not having an impact on the Arun Valley sites, developments within this zone must not add to this impact. Therefore, such applications, even where mitigation is proposed, must progress to Appropriate Assessment (AA).<br><br>Natural England's Position Statement (September 2021) is that the Sussex North Water Supply Zone includes supplies from a groundwater abstraction which cannot, with certainty, conclude no adverse effect on the integrity of;<br>• Arun Valley Special Area Conservation (SAC)<br>• Arun Valley Special Protection Area (SPA)<br>• Arun Valley Ramsar Site |
| **HRA Screening Assessment Criteria** | |
| The individual elements of the project (either alone or in combination with other plans or projects) likely to give rise to impacts on the Arun Valley SAC, SPA and Ramsar site | Based on the threat from water demand identified by Natural England's Position Statement, the development proposals need assessment for hydrological changes to the Arun Valley SAC/ SPA/ Ramsar site.<br><br>For applications, does the evidence show any likely significant effect on Arun Valley SAC/SPA/Ramsar site, without mitigation measures (either alone or in-combination with other plans or projects)? **YES**<br><br>Test 1 the significance test below has been completed as the evidence shows a likely significant effect on Arun Valley SAC/SPA/Ramsar site, without mitigation measures (in-combination with other plans or projects). |

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| Test 1 the significance test: – Can a judgement be made as to whether there could be any potential significant impacts of the development on the integrity of the Arun Valley SPA/ SAC/Ramsar. | Following the CJEU ruling People over Wind, it is no longer lawful to take into account any avoidance and mitigation measures as part of the application at this stage of HRA.<br><br>For applications where increased demand for water resources is the only mechanism of impact, Natural England's advice is that such applications - **without mitigation** - will have a likely significant effect on the Arun Valley SAC/SPA/Ramsar site in combination with other developments in the Sussex North WSZ. **Yes.**<br><br>Therefore, such applications, even where mitigation measures (minimise water use and water offsetting) are proposed, will progress directly to Stage 2 Appropriate Assessment to consider, with mitigation, the impacts of the development on mains water usage on the above designated sites, either alone or in combination with other plans and projects.<br><br>**Explanation: All development likely to increase the demand for mains water usage, is predicted to result an identifiable impact on the Arun Valley SAC/SPA/Ramsar sites.**<br><br>After mitigation has been embedded into the project design, Test 2 – the integrity test then needs to be applied. |
| **Stage 2 Appropriate Assessment** | |
| The above Stage 1 HRA screening has determined that a Likely Significant Effect is predicted at Arun Valley SAC/SPA/Ramsar site as a result of impacts on water quantity. This pathway has been screened in, and the potential for adverse effects on site integrity, either alone or in-combination will be assessed.<br><br>Therefore, this section of the report to inform HRA Stage 2 only discusses the potential for impacts on water quantity as a result of the proposed development. | |
| Potential for Adverse Effects On the Integrity (AEOI) of a Habitats site from the development alone or in combination. | Supplementary advice on conserving and restoring site features for Arun Valley SAC/SPA sets a number of targets for the site under the supporting the Conservation Objectives in order that the integrity of the sites is maintained or restored as appropriate, and ensure that the sites contribute to achieving the Favourable Conservation Status of the Qualifying Features.<br><br>The targets cover hydrology and flow, water quantity, area depth and water quality. The hydrology of the river Arun is the major factor affecting these targets and this is turn is affected by the abstraction at Hardham for the supply of drinking water. Continued or increased levels of groundwater abstraction at Hardham reduces water quantity in the Arun Valley sites and adversely affects water levels and flow within the sites (in combination with other plans and projects in the Sussex North WRZ).<br><br>Without an alternative sustainable water supply or mitigation measures, the hydrology of the sites will be unable to maintain the types and extents of habitats requited to maintain the Qualifying Features. |

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| Details of Water usage for the development | This HRA seeks to agree that Grampian-style conditions can be applied to qualifying development proposals within Horsham District. These conditions would be applied in situations where, as a starting point, there would be a net increase in water consumption from the development, prior to mitigation. |
| Proposed mitigation for the project to secure the mitigation as a condition of any consent<br>e.g. alternative sustainable water supply, minimising water use in new development.<br>Water offsetting for residual demand in existing buildings in the Sussex North WRZ. See Position Statement issued by Natural England (September 2021) | **Summary of mitigation package**<br>The affected local authorities within the Sussex North Water Supply Zone have been jointly producing a water offsetting scheme- the Sussex North Offsetting Water Scheme ("SNOWS"). The purpose of SNOWS is to utilise demand capacity generated by Southern Water efficiency savings, allied with other water saving projects identified by SNOWS, to generate 'credits' for applicants to purchase to offset their water demand. Not all development will be eligible for access to SNOWS, as the purpose of SNOWS is to enable plan-led development to come forward only. As it currently stands access will be limited as follows:<br><br>'*Applicants will be able to access SNOWS for their development's water offsetting needs, unless it is:*<br>*1. Development where the principle is not in accordance with an adopted development plan, or in a post-submission local plan or neighbourhood plan. This 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*<br><br>*2. Development permitted by virtue of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or as subsequently amended) (GPDO)**<br><br>** Excluding applications submitted to SNOWS for development by a local authority (as defined in Schedule 2, Part 12 of the GDPO)'*<br><br>Progress on implementing SNOWS is nearing its conclusion. Recent evidence derived from the Southern Water 2024 draft Water Resources Management Plan ("WRMP") indicates that Southern Water will be able to provide water capacity for new development within the next three years, the lifetime of any planning permission. This water capacity will form approximately 88% of the capacity of SNOWS.<br><br>The test for a Grampian-style condition is set out in the national Planning Practice Guidance. The key test in applying a Grampian-style condition is whether there is 'a prospect' of the required action being carried out within the lifetime of a development. 'A prospect' is a low bar.<br><br>In recent appeal decisions planning inspectors have determined that Grampian-style conditions can be applied to development proposals as, despite SNOWS not yet being operational, there is 'a prospect' of a development being able to purchase SNOWS credits within the lifetime of the planning permission (normally |

3 years). These appeals can be found under appeal refs: 3308455, 3321658 and 3333968.

Given these appeal decisions, the progress of SNOWS, and the prospect of SNOWS having capacity to mitigate the impacts of new development over the next 3 years, it is proposed that the following Grampian-style condition (and any minor variations thereof) be applied to all development that is eligible for access to SNOWS:

'**No development shall commence until either:**

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

**ii) A site-specific water neutrality mitigation scheme has been submitted to and been approved in writing by the Local Planning Authority. The site-specific water neutrality mitigation scheme shall include full details of the means of any and all onsite and offsite mitigation and any necessary agreements pursuant to S106 of the Town and Country Planning Act 1990 to deliver and secure the approved mitigation; and**

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

**Reason: To ensure the development is water neutral to avoid an adverse impact on the Arun Valley SAC/SPA and Ramsar sites in accordance with Policy XXX of the XXXX, Paragraph 193 of the National Planning Policy Framework (2024), and to enable the Local Planning Authority to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), and s40 of the NERC Act 2006 (Priority habitats & species).'**

This condition will enable applications for Full planning permission, Outline planning permission, or Reserved Matters to be permitted as water neutral. The condition operates to ensure no water demand generating activity (such as housing occupations) can take place until either SNOWS credits have been purchased, or an alternative bespoke water neutrality solution has been submitted, passed through a separate successful Appropriate Assessment, and has been implemented. In this way development proposals can gain the certainty of obtaining planning permission with a suitable mechanism to avoid harm to the affected habitat sites.

Development proposals that are not eligible for access to SNOWS would not be subject to this condition, as the acceptability of the condition is predicated on the prospect of a development being able to access SNOWS credits. All non SNOWS eligible development would continue to need to demonstrate certainty of mitigation on a case-by-case basis before planning permission can be granted.

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| Test 2 – the integrity test | **Conclusion:**<br>Having considered the proposed avoidance and mitigation measures above to be provided in-perpetuity through:<br>• The use of the above Grampian condition (or minor amendments thereto) will ensure adverse harm to the integrity of the Arun Valley habitat sites will be avoided.<br><br>Horsham District Council concludes that, with mitigation, the project will not have an Adverse Effect on the Integrity of the Arun Valley SAC/ SPA /Ramsar site, either alone or in combination with other plan and projects.<br><br>This development would therefore be in conflict with the conservation objectives for the Arun Valley SPA, SAC and Ramsar site which include 'maintaining or restoring the population of Qualifying Features'. See Appendix 1.<br><br>As the mitigation has been considered after HRA screening, this HRA Appropriate Assessment is in line with the People over Wind CJEU Court ruling and, being beyond reasonable scientific doubt concerning the effects of the work envisaged on the site concerned, is also in line with the Holohan and Others v An Bord Pleanála court ruling.<br><br>Having prepared this Appropriate Assessment of the implications of the project for the Arun Valley sites in view of their conservation objectives, subject to consultation with Natural England and fully considered any representation received where necessary, the authority can now agree to the project under regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended). |

**Approving Planner**: Hannah Darley **Date: 15**.07.2025

**DISCLAIMER: This information has been produced by Place Services's Ecology Team on behalf of Horsham District Council, at their request.**

## Appendix 1 – details of Arun Valley SAC/SPA/Ramsar site

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| Qualifying Features for SPA/SAC | **Arun Valley SPA**<br><br>A037 Bewick's swan, *Cygnus columbianus bewickii* (non-breeding). During the time of site notification, the SPA supported 115 individuals representing at least 1.6% of the wintering population in Great Britain (5 year peak mean 1992/93 - 1996/97).<br><br>During the non-breeding season, the SPA regularly supports an assemblage of waterfowl with the area regularly supporting 27,241 individual waterfowl (5 year peak mean for 1992/93 to 1996/97) including: Shoveler *Anas clypeata*, Teal *Anas crecca*, Wigeon *Anas penelope*, Bewick's Swan *Cygnus columbianus bewickii.*<br><br>**Arun Valley SAC**<br>4056 Little Whirlpool Ramshorn snail *Anisus vorticulus*<br>*Anisus vorticulus* occurs across a range of sites in southern and eastern England. The Arun valley is one of the three main population centres for this species in the UK. This proposed site includes two of its core sites in the |

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| | wash lands of the Arun floodplain (Pulborough Brooks and Amberley Wild Brooks SSSIs). |
| Qualifying Features for Ramsar | **Arun Valley Ramsar**<br>**Ramsar criterion 2**<br>The site holds seven wetland invertebrate species listed in the British Red Data Book as threatened. One of these, *Pseudamnicola confusa*, is considered to be endangered. The site also supports four nationally rare and four nationally scarce plant species<br>**Ramsar criterion 3**<br>In addition to the Red Data Book invertebrate and plant species, the ditches intersecting the site have a particularly diverse and rich flora. All five British duckweed (*Lemna* species), all five water-cress (*Rorippa* species), and all three British water milfoils (*Myriophyllum* species), all but one of the seven British water dropworts (*Oenanthe* species), and two-thirds of the British pondweeds (*Potamogeton* species) can be found on site.<br>**Ramsar criterion 5**<br>Assemblages of international importance: Species with peak counts in winter: 13774 waterfowl (5 year peak mean 1998/99-2002/2003) |
| Conservation Status of the relevant Qualifying Features | **Arun Valley SAC, SPA and Ramsar**<br>In line with the national trend, the number of Bewick's swans wintering in the Arun Valley has declined since the time of designation and is now typically fewer than 50 birds. This may reflect an overall decline in the population of the species and/or be due to the effects of a milder climate in which more are able to winter in continental Europe (The Birds of Sussex, 2014). The waterfowl assemblage numbers fluctuate depending upon conditions in the valley but over the past five years have averaged 40,311, an increase from the five year mean of 27,241 at the time of designation.<br>The Arun Valley is one of the remaining strongholds for the Little Whirlpool Ramshorn Snail. |
| Conservation Objectives (Only Relevant for SPA/SAC) | **Arun Valley SAC & SPA**<br>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;<br>• The extent and distribution of the habitats of the qualifying features<br>• The structure and function of the habitats of the qualifying features<br>• The supporting processes on which the habitats of the qualifying features rely<br>• The population of each of the qualifying features, and,<br>• The distribution of the qualifying features within the site. |

**Variation of conditions 8,9, 10 and 11 of DC/21/1796 (APP/Z3825/W/22/3311819)**

**Pear Tree Farm, Furners Lane, Woodmancote BN5 9HX**

The application relates to conditions imposed on a permission granted at appeal (reference APP/Z3825/W/22/3311819) following refusal of application DC/21/1796 for a settled gypsy accommodation site comprising 5 pitches and associated utility buildings.

The appeal was allowed with a number of conditions (amongst others) relating to water neutrality.

The application proposed that water neutrality would be addressed by the use of a natural spring on adjacent land owned by the applicant.

This was accepted as an appropriate method of demonstrating water neutrality by the Inspector.

The conditions in relation to water neutrality remain undischarged and the permission remains extant until 29th February 2027

Since this time the LPA have developed SNOWS and this is due to be launched in spring 2025.

Current guidance provided by the LPA states that:

> *Applicants will be able to access SNOWS for their development's water offsetting needs, unless it is:*
>
> *Development where the principle is not in accordance with an adopted development plan or neighbourhood plan, or a post-submission local plan (all of which have informed the preparation of Southern Water's Water Resources Management Plan 2024 calculations of water demand). This includes housing development on unallocated sites outside settlement boundaries, 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*

The application related to the provision of a gypsy traveller site and as such would be in accordance with the above statement and therefore accessible to SNOWS.

The following conditions were imposed on DC/21/1796 (APP/Z3825/W/22/3311819

8. *No development shall commence until evidence that water from the spring has been sampled by a suitably qualified person and analysed by an accredited laboratory and the findings submitted to the local planning authority. In the event the samples show that any of the parameters are above prescribed concentrations or values, as detailed in Schedule 1 of the Private Water Supplies (England) Regulations 2016, no development shall commence until a mitigation scheme has been submitted to and approved in writing by the local planning authority that demonstrates how the water will be treated to meet the requirements of Schedule 1 of the Private Water Supplies (England) Regulations 2016 (or subsequent superseding equivalent). The mitigation scheme shall then be implemented in full prior to first occupation of any pitch and it shall be retained and maintained thereafter at all times*

9. *No development above ground floor slab level shall commence until a management and maintenance plan for the spring water supply system has been submitted to and approved in writing by the local planning authority. The management and maintenance plan shall include the following details:*

   *(a) The sampling regime and parameters etc, recognising that the sampling will need to be undertaken by a suitably qualified person and accredited laboratory.*

   *(b) Detail on how any failure of any samples will be investigated and managed.*

   *(c) Details, including a plan or schematic, showing the supply – storage tanks, treatment etc, and means to record the total water consumption of each of the five pitches.*

   *(d) Detail on what type of treatment will be installed on the supply, with information clearly indicating that it is appropriate for the amount of water being used.*

   *(e) Detail on how the treatment system, pipework, tanks etc will be cleaned and maintained and who will maintain them for the lifetime of the development. This should include any re-activation of the system after it has been out of use due to rainfall/use.*

   *(f) The completion and sharing of Regulation 6 risk assessment by a suitably competent person (as required by the Private Water Supplies (England) Regulations 2016) prior to the water supply being put to use.*

*(g) Arrangements for keeping written records of all sampling, results of analysis, inspection, cleaning, and maintenance.*

*(h) Details of contingency plans to ensure any failures or reported concerns with the supply are investigated and rectified as soon as possible, including timeframes. This should include notification of the investigation and corrective actions to the local planning authority.*

*The management and maintenance plan shall be operated in full at all times. No alterations or revisions to the approved management and maintenance plan shall be implemented without the prior written approval of the local planning authority.*

*10. No pitch shall be first occupied until evidence has been submitted to and approved in writing by the local planning authority that water taken from the water treatment plant meets the requirements of Schedule 1 'Prescribed concentrations or values' of the Private Water Supplies (England) Regulations 2016.*

*11. No pitch hereby permitted shall be connected to or draw supply from the mains water supply. Where a temporary failure has occurred, the occupiers shall undertake the contingency measures set out in the management and maintenance plan agreed under condition 8 until such time as the system is fully operational.*

It is proposed to remove conditions 8,9,10 and 111 as stated above and replace with the following Pre-Commencement Condition:

No development shall commence until either:

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

*or*

*ii.) A site-specific water neutrality mitigation scheme has been submitted to and been approved in writing by the Local Planning Authority. The site-specific water neutrality mitigation scheme shall include full details of the means of any and all onsite and offsite mitigation and any necessary agreements pursuant to S106 of the Town and Country Planning Act 1990 to deliver and secure the approved mitigation; and*

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

*Reason: To ensure the development is water neutral to avoid an adverse impact on the Arun Valley SAC/SPA and Ramsar sites in accordance with Policy 31 of the Horsham District Planning Framework (2015), Paragraph 193 of the National Planning Policy Framework (2024), and to enable the Local Planning Authority to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), and s40 of the NERC Act 2006 (Priority habitats & species).*

This condition is the same as conditions offered by the LPA on other Gypsy Traveller sites in the district and so is considered to be reasonable and enforceable.

## Water Neutrality statement

**The following sets out the proposed water usage for each unit and is to be used for the purposes of calculating the SNOWS allocation.**

**Baseline Water Consumption and Water reduction measures**

The following summarises the flow rates for the fittings in the proposed units.

These have been achieved by the use of efficient fixtures and fittings in order to reduce the water demand.

- WC- 4/2 litre dual flush
- Kitchen sink tap with a flow rate of 4 litre per minute
- Shower with a flow rate of 6 litre per minute
- Bathroom basin taps with a flow rate of 4 litre per minute
- Dishwasher – 0.99 litres per place setting
- Washing machine – 8.5 litres / kg dry load

Using the above figures, the water usage can be calculated using a Part G water calculator as shown below.

This demonstrates a water demand of 84 litres / person / day which includes an allowance of 5 litres per person per day for external water usage.

Census data has been used to estimate the average number of occupants (as per HDC guidance)

This sets out that the following occupancy rates should be used.

One-bedroom dwellings: 1.32 occupants
Two-bedroom dwellings: 1.88 occupants
Three-bedroom dwellings: 2.47 occupants
Four-bedroom dwellings: 2.86 occupants
Five-bedroom dwellings: 3.09 occupants.

The units will be a maximum of three bedroom and so a figure of 2.47 people should be used.

Using the Part G water demand figure of 84 litres per person per day and a population size of 2.47 it is estimated that the total water usage per day is 207.48 litres per day per unit.

Across the 5 units therefore there will be a total daily demand of 1037.40 litres.

**Contact details of the person we should contact to initiate the SNOWS application process.**

Ben Kirk

Manorwood
Suite 114
26 The Hornet
Chichester
PO19 7BB

[redacted]

PART G WATER CALCULATION

Water Calculator | WC | Taps (Other) | Taps (Kitchen/Utility) | Baths | Dishwashers | Washing Machines | Showers | H2O softeners | Greywater | Rainwater

| Installation Type | Unit of Measure | Capacity/Flow rate (1) | Use Factor (2) | Fixed use (litres/person/day) (3) | Litres/person/day = [(1)x(2)] + (3) (4) |
|---|---|---|---|---|---|
| **WC** (single flush) | Flush Volume (litres) | | 4.42 | 0.00 | 0 |
| **WC** (dual flush) | Full flush Volume (litres) | 4 | 1.46 | 0.00 | 5.84 |
| | Part flush Volume (litres) | 2 | 2.96 | 0.00 | 5.92 |
| **WC** (multiple fittings) | Average effective flushing Volume (litres) | | 4.42 | 0.00 | 0 |
| **Taps** (excluding kitchen/utility room taps) | Flow rate (litres/min) | 4.00 | 1.58 | 1.58 | 7.90 |
| **Bath** (where shower also present) | Capacity to overflow(litres) | | 0.11 | 0.00 | 0 |
| **Shower** (where bath also present) | Flow Rate(litres / minute) | | 4.37 | 0.00 | 0 |
| **Bath Only** | Capacity to overflow(litres) | | 0.50 | 0.00 | 0 |
| **Shower Only** | Flow Rate (litres/minute) | 6.00 | 5.60 | 0.00 | 33.60 |
| **Kitchen/Utility room sink taps** | Flow rate (litres/minute) | 4.00 | 0.44 | 10.36 | 12.12 |
| **Washing Machine** | (Litres/kg dry load) | 8.50 | 2.1 | 0.00 | 17.85 |
| **Dishwasher** | (Litres/place setting) | 0.99 | 3.6 | 0.00 | 3.56 |
| **Waste disposal unit** | (Litres/use) | ☐ Present | 3.08 | 0.00 | 0 |
| **Water Softener** | (Litres/person/day) | | 1.00 | 0.00 | 0 |
| | (5) | Total Calculated use (litres/person/day) =SUM(column 4) | | | 86.79 |
| | (6) | Contribution from greywater (litres/person/day) | | | 0 |
| | (7) | Contribution from rainwater (litres/person/day) | | | 0 |
| | (8) | Normalisation factor | | | 0.91 |
| | (9) | Total internal water consumption = [(5)-(6)-(7)]x(8) (litres/person/day) | | | 78.98 |
| | (10) | External water use | | | 5.0 |
| | (11) | Total water consumption (Building Regulation 17.K) =(9)+(10)(litres/person/day) | | | 84.0 |

Click here to fill in details before printing: