Christ's Hospital, Horsham, West Sussex, RH13 0LJ

Water Neutrality Statement

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Prepared on behalf of Christ's Hospital Foundation

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1 Introduction

1.1.1 This Water Neutrality Statement (WNS) has been prepared to accompany a full planning application submitted to Horsham District Council (HDC) on behalf of Christ's Hospital Foundation (CHF; the Applicant) for the replacement of the existing Staff Welfare Facilities at Christ's Hospital, Horsham, West Sussex, RH13 0LJ, with a new building on the existing footprint.

1.1.2 CHF is a registered charity, whose principal objective is to aid the advancement of education for children, principally for the benefit of those who have social, financial and other specific needs. The assets and endowments of the Foundation are used to support more than 600 bursary places at the school. The ability of the Foundation to meet the financial needs of the school depends critically on funding which derives from the endowment and returns from their investments.

1.1.3 The opportunities provided by the Foundation's land are directly linked to its charitable purposes. The main building to which the replacement welfare block attaches, originally served as an Art Block. In 1985 permission was granted for the conversion of the main building to provide boarding accommodation and a Matron's office. Since this time, the use of the building has changed to accommodate supporting professional services for the management of the school.

1.1.4 The Foundation views the Proposed Development as necessary due to the poor condition of the existing building. The replacement of the existing extension with a high quality building will provide facilities that the school requires to meet its current and future needs.

1.1.5 On 14 September 2021, HDC received a Position Statement from Natural England (NE). In this Statement, NE explains that it could not be concluded that water abstraction for drinking water supplies within the Sussex North Water Resource Zone (SNWRZ; also referred to as the 'Sussex North Water Supply Zone', SNWSZ) was not having a negative impact on a number of designated sites including Amberley Wild Brooks Site of Special Scientific Interest (SSSI) and Pulborough Brooks SSSI. These form part of the Arun Valley Special Protection Area (SPA), Arun Valley Special Area of Conservation (SAC) and Arun Valley Ramsar site. As a result, NE advised HDC that any new development that takes place within Horsham must not add to this negative impact, i.e. that all development should be water neutral.

1.1.6 All applications in the affected area are now expected to be supported by a WNS, which will help with the Appropriate Assessment under the Habitats Regulations. Where a proposal overlaps with other competent authorities' areas of responsibility, the lead competent authority should be identified.

1.1.7 In agreeing the lead competent authority, this should be based on who has the:

- best technical expertise – when a technical issue is the most important factor in assessing the impact of the proposal

- main interest in cross-boundary cases
- capacity to manage where there are many complex and cross-boundary issues

1.1.8 A WNS has been made a planning application validation requirement in Horsham. The application site falls within the SNWSZ as defined by NE. Hence, this statement responds to water neutrality obligations set out by HDC and NE in relation to the Proposed Development.

1.1.9 This WNS follows the guidance set out by HDC on its 'Water neutrality and planning applications' webpage, which is updated periodically and was accessed 29 April 2025 (Horsham District Council, 2025). This statement includes all of the elements that HDC expect a WNS to include based on the website's guidance.

2 Background

2.1 Staff Welfare Facilities

2.1.1 The existing Staff Welfare Facilities building was constructed around the year 2000, following a full planning application for a temporary classroom accommodation and shower block. The Application was approved on October 7th 1999 (ref. SQ/85/99). The building was constructed as a temporary facility and as a result, it is now in urgent need of replacing due to its poor condition and outdated design. The opportunity to erect a new building presents a chance to enhance both functionality and aesthetic coherence on the site.

2.1.2 The new proposed building, located adjacent to the Prep House and connected by link corridors, adheres to the proportions, scale, and materials of the adjacent Prep House, aiming to complement the site's overall architecture.

2.1.3 The WNS presented here accompanies a planning application for the replacement of the existing Staff Welfare Facilities at Christ's Hospital, Horsham, West Sussex, RH13 0LJ. It robustly assesses the existing and anticipated water consumption associated with the Proposed Development, following the guidance set out on HDC's 'Water neutrality and planning applications' webpage (Horsham District Council, 2025), and utilises the BREEAM Wat 1 water calculator (BREEAM, 2025) as recommended for commercial use developments by HDC (Horsham District Council, 2015).

2.2 Site description

2.2.1 The site consists of a one-storey temporary classroom accommodation and shower block. The site is owned by the Christ's Hospital Foundation (CHF).

2.2.2 Figure 2-1 illustrates the site location and wider surroundings, reproduced from the Planning Statement associated with this application.

2.2.3 The site is located in the east of the wider site of Christ's Hospital. Agricultural fields and woodland immediately surround the wider site. The River Arun is located approximately 500 m to the north of the site. Together with tributaries, it flows from the north-west to the north-east between Christ's Hospital Road and Two Mile Ash Road. The closest residential properties are located approximately 200 m north of the site along Station Road, 250m east of the site along Two Mile Ash Road, and 300m west of the site along King Edward Road.

2.2.4 The site falls under the jurisdiction of HDC and is within Southwater Parish. It lies within Southwater's designated Built Up Area Boundaries (BUAB).

Figure 2-1 Site location and wider surroundings



2.3 Proposed Development

2.3.1 The planning application is for the demolition of the existing Staff Welfare Facilities building, and erection of a new building at the same site, which would sit approximately on the same sized footprint and not exceed the height of the existing building by more than 0.2m. The building will be made up of separate ladies and gents WCs and changing rooms on the first floor.

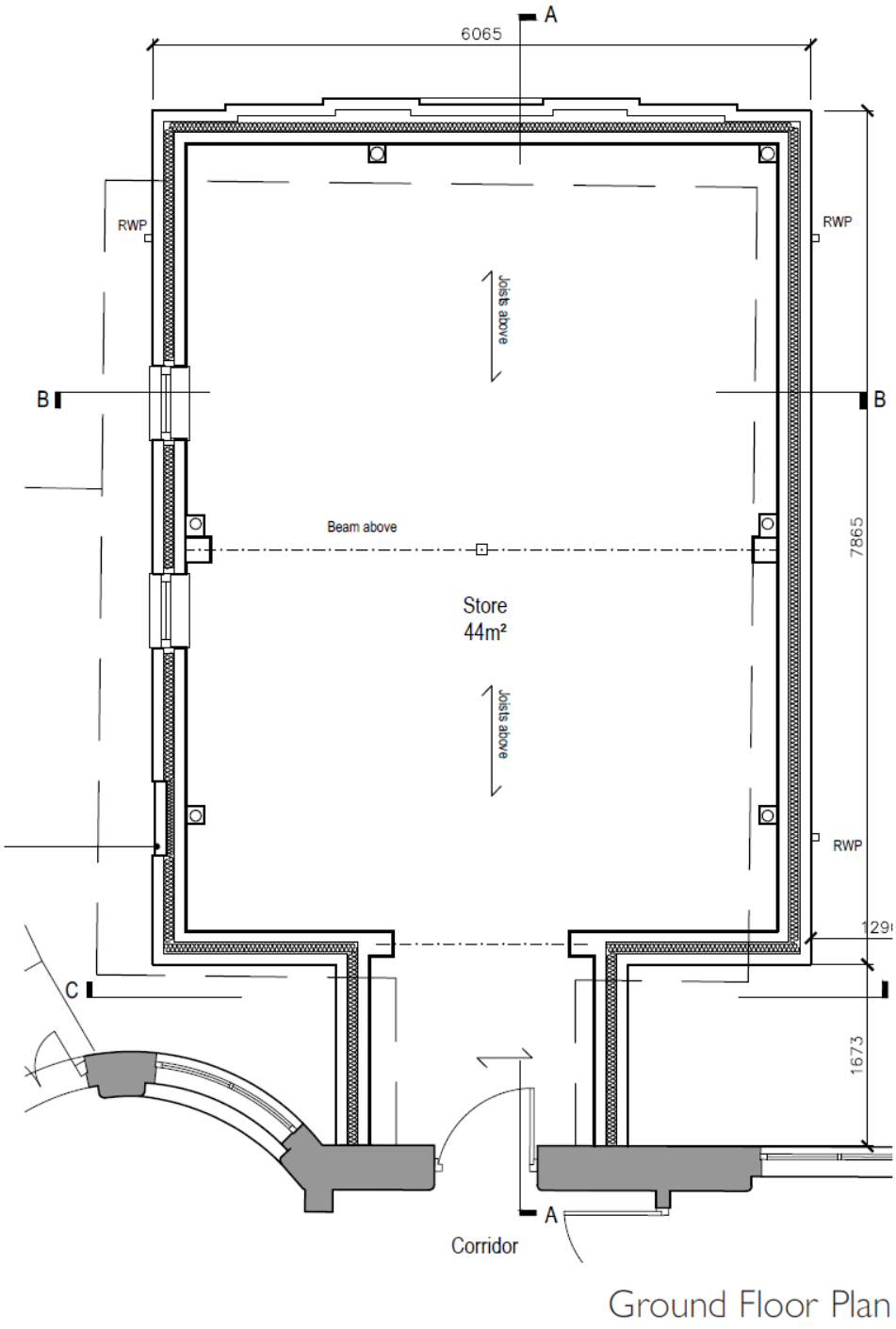
2.3.2 The existing staff facilities building is currently utilised by CHF staff. The makes and models of all existing water consuming appliances have been provided by CHF to determine baseline water consumption at the site, details of which are provided in Table 2-1 below. These fittings form the basis of the subsequent BREEAM Wat 1 calculations. Flow rates and water consumption figures have been derived from product specifications.

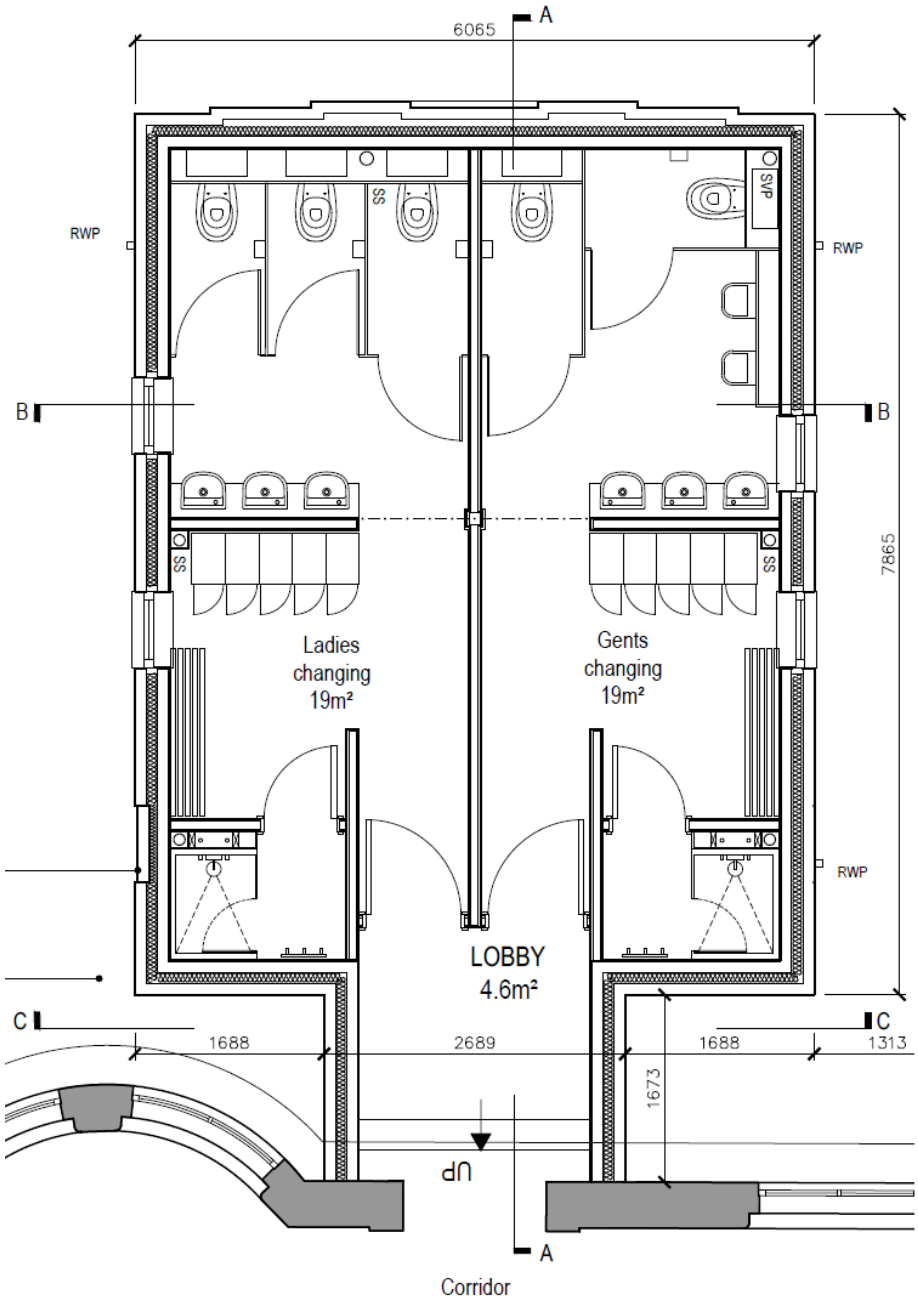
Table 2-1 Existing water fittings

Fitting	Measure (units)	Value	Product details
In both ladies and gents WCs			
WC (single flush)	Flush volume (litres)	6.00	Macdee Elan low level bottom inlet bottom outlet cistern
WC (dual flush)	Flush volume (litres)	Full flush: 6.00 Half flush: 4.00	Dudley Acclaim V Valve flushing exposed cistern
Bathroom taps	Flow rate (litres/min)	11.20	Bristan BS5412 cross head pillar bath taps

2.3.3 Figure 2-2 illustrates the internal layout of the Proposed Development. The sources of water consumption within the proposed building will be the ladies changing room and WC, and the gents changing room and WCs. A schedule of water-consuming fittings and appliances is presented in Table 2-2. These fittings form the basis of the subsequent BREEAM Wat 1 calculations. Flow rates and water consumption figures have been derived from product specifications.

Figure 2-2 Internal layout of proposed staff facilities block





First Floor Plan

Table 2-2 Water fittings schedule

Fitting	Measure (units)	Value	Product details
Ladies WCs			
WC (dual flush)	Flush volume (litres)	Full flush: 4.00 Half flush: 2.60	OSMO T1 concealed cistern Chartham Back to Wall WC Drift Pneumatic Push Plate
Bathroom taps (6 ltr/min flow regulator included)	Flow rate (litres/min)	6.00	Deck Mounted Sensor Tap Chartham Semi-Recessed Basin 450, RHTH
Ladies Changing Room			
Shower	Flow rate (litres/min)	8.00	T80 Pro-Fit Electric Shower
Gents WCs			
WC (dual flush)	Flush volume (litres)	Full flush: 4.00 Half flush: 2.60	OSMO T1 concealed cistern Chartham Back to Wall WC Drift Pneumatic Push Plate
Waterless Urinal	N/A	N/A	Langley Waterless Urinal
Bathroom taps (6 ltr/min flow regulator included)	Flow rate (litres/min)	6.00	Deck Mounted Sensor Tap Chartham Semi-Recessed Basin 450, RHTH
Gents Changing Room			
Shower	Flow rate (litres/min)	8.00	T80 Pro-Fit Electric Shower

2.4 Water neutrality in Horsham District

2.4.1 The issue of water neutrality in Horsham District arose in September 2021 as a result of the position statement from Natural England, referred to above, which stated that water demand within the SNWSZ might have a potential impact on internationally protected sites and species within Arun Valley SPA, Arun Valley SAC and Arun Valley Ramsar site, most notably an impact to the Little Whirlpool Ramshorn Snail. The position statement stated 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 the aforementioned designated sites."* The mechanism by which Natural England concluded there might be a link between development and increased groundwater abstraction was not explained, however, and neither was the link between abstraction of groundwater and water quality or quantity at the designated sites.

2.4.2 These sites receive statutory protection under the Conservation of Habitats and Species Regulations 2017 (the Regulations) (HM Government, 2017) as amended post-Brexit. These Regulations transpose into UK legislation the 'Habitats Directive' 1992 (92/43/EEC) (HM Government, 1992) and the 'Birds Directive' 2009 (2009/147/EC) (HM Government, 2009). National planning policy sets out that listed Ramsar sites should be considered in the same way as if they had been classified or designated as SACs or SPAs, as stated in paragraph 181 of the National Planning Policy Framework (Department for Levelling Up, Housing and Communities, 2023).

2.4.3 The Regulations impose a duty on local planning authorities (competent authorities) to carefully consider whether any proposals may have a significant effect on a European designation, either alone or in combination with other plans or projects. In most circumstances, permission may only be granted for a plan or project to proceed if it has been ascertained that it will not have an adverse effect on the integrity of any such designation.

2.4.4 The SNWSZ includes the whole of the administrative areas of HDC and Crawley Borough Council, as well as the north of Chichester District Council and areas within the South Downs National Park Authority. The impact of the position statement has effectively resulted in a moratorium on the positive determination of planning applications which require mains water use in the affected areas unless water neutrality can be demonstrated.

2.4.5 Definitions of water neutrality often vary depending on the context in which the definition is used. HDC defines water neutrality as:

"Development that takes place which does not increase the rate of water abstraction for drinking water supplies above existing levels." (Horsham District Council, 2025)

2.4.6 NE gave a slightly different definition of water neutrality in its 2021 position statement to HDC:

"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."

2.4.7 Neither definition addresses abstraction of groundwater, appearing instead to be aiming for either no more use of water or no more use of water for drinking water supplies. This WNS will use HDC's definition of water neutrality, which is somewhat more precise than NE's.

Further consideration of water neutrality

2.4.8 It should be noted that the real issue, as acknowledged by Horsham District Council, surrounding water use and the protected sites and species within the Arun Valley SPA, Arun Valley SAC and Arun Valley Ramsar site, is a potential link between groundwater abstraction at Hardham and an adverse impact on the integrity of the protected site. There also needs to be a link between development and increased groundwater abstraction at Hardham. Therefore, it is not true that water use across the whole of the SNWSZ must be frozen. This is because water supply to the SNWSZ is not only from Hardham. Hence, water use across the SNWSZ could increase as long as this does not increase groundwater abstraction at Hardham (i.e. water consumption across the SNWSZ can increase if water supply is sourced from sources other than Hardham groundwater abstraction).

2.4.9 There is ample water available to Southern Water (SW) to supply projected development needs without additional, or for that matter *any* groundwater abstraction at Hardham. SW, under the Water Industry Act, have a duty to supply sufficient water as demanded, whilst also protecting the environment and specifically Habitats Regulations protected sites. The Environment Agency (EA), through the on-going Water Resources Management Plan process (currently WRMP 2024), are requiring SW to identify its supply sources which do not rely on increasing groundwater abstraction from Hardham.

2.4.10 SW, in a 'Statement of Response' to consultation under WRMP 2024, indicated that they are able to supply water in the SNWSZ without increasing groundwater abstraction at Hardham. Hence, development, such as the one which is the subject of this Water Neutrality Statement, can proceed without increasing groundwater abstraction at Hardham, and therefore without adverse impacts to the relevant protected sites.

Local planning policy

Horsham District Planning Framework 2015

2.4.11 The Horsham District Planning Farmwork 2015 (Horsham District Council, 2015) is the current, adopted Local Plan covering the jurisdiction of HDC. There is no specific policy regarding water neutrality requirements in the current Local Plan, which is the applicable planning policy for determination of this application.

2.4.12 However, the Local Plan does encourage water efficiency in Policy 37 Sustainable Construction, which states: "*Proposals must seek to improve the sustainability of development. To deliver sustainable design, development should incorporate the following measures where appropriate according to the type of development and location:* [inter alia] *Limit water use to 110 litres/person/day".*

Draft Horsham District Local Plan 2023-2040 (Regulation 19)

2.4.13 The Regulation 19 Horsham District Local Plan 2023-2040 (Draft Local Plan) is currently available in draft version, and is due to undergo further public consultation and examination in principle in 2024. The Draft Local Plan serves, in part, as a response to the aforementioned position statement issued by NE, acknowledging that the key challenge for the district is continuing to protect the environment while also achieving growth. As the Local Plan is an emerging draft, yet to undergo examination and be adopted, it holds limited weight in planning terms at present, but indicates the possible future direction of policy in the area. Although the specifics of future policy (yet to be adopted) are not yet fixed, this Water Neutrality Statement does provide the type of the assessment of water efficiency and offsetting that may be sought by emerging policy.

2.5 Water neutrality work undertaken in Horsham District

The Sussex North Water Neutrality Study

2.5.1 In response to the issue of water neutrality in North Sussex, a study was commissioned by HDC and carried out in three stages, A–C (Horsham District Council, 2023b).

Part A

2.5.2 The first stage of the work on water neutrality was studies that examined the impacts on water neutrality for each local authority area on an individual basis.

Part B

2.5.3 The second stage considered the total (or cumulative) impact of proposed development in all the local authority areas that use Sussex North Water Supply Zone (Horsham District Council, Crawley Borough Council, Chichester District Council, West Sussex County Council and the South Downs National Park). The purpose of this work was to understand how water demand may increase in the future and work out how much water will need to be 'offset' through water neutrality.

Part C

2.5.4 The '*Part C'* – Mitigation Strategy was published in December 2022. This study built upon and updated previous work, and set out a water neutrality strategy for all affected authorities. This included recommending a policy approach with regard to water efficiency standards in new development and setting out principles for an

offsetting scheme, which together would allow water neutrality to be achieved by growth identified in local plans.

2.5.5 The Part C Mitigation Strategy proposed the creation of an LPA-led scheme to provide water offsetting, which has since been termed the Sussex North Offsetting Water Scheme (SNOWS). SNOWS is undergoing consultation and has not yet reached the stage of implementation where offsets are available to developers. In the interim therefore it is necessary for developments where water neutrality applies to seek privately developed offsets in order to contribute to meeting the HDC mitigation strategy aims.

Pulborough Brooks

2.5.6 Pulborough Brooks Nature Reserve is managed by the Royal Society for the Protection of Birds (RSPB) to provide the *"perfect condition for wildlife"* (RSPB, 2023). It contains a network of ditches which are the habitat of the threatened little whirlpool ramshorn snail.

2.5.7 A combination of controlled flooding, grazing and hay cutting are used to manage the wet grasslands to create a healthy mosaic of grassland habitats.

2.5.8 The ditches which cross the wet grasslands need clearing out to move water around the site. This is done on rotation, to always keep some of the vegetation which lives there and to give a home to rare wildlife, including the little whirlpool ramshorn snail.

2.5.9 In 2017 the ditches were the focus of a Heritage Lottery funded project "Back from the Brink" which helped create ideal conditions for the rare little ramshorn whirlpool snail and other aquatic species.

Groundwater licensing

2.5.10 Groundwater abstraction is licensed by the Environment Agency. In the case of water abstracted at Hardham, this is managed by Southern Water which applies for the right to abstract water in accordance with population forecasts associated with the relevant Local Plan, including windfall development. Such applications are accompanied by the relevant environmental information in order to allow the Environment Agency, as competent authority, to conduct Habitats Regulations Assessments and consider licensing in light of this.

2.5.11 Investigations and discussions between Southern Water, the Environment Agency and Natural England are ongoing. However, groundwater abstraction from Hardham has been reduced in accordance with the Environment Agency's ongoing management requirements. SW has confirmed it will not increase groundwater abstraction from Hardham at least until a Sustainability Assessment has been published in March 2025.

3 Baseline Calculations

3.1 Micro-component analysis estimations

3.1.1 As per Horsham District Council's definition of water neutrality (development that takes place which does not increase the rate of water abstraction for drinking water supplies above existing levels), it is necessary to calculate the difference between historical and anticipated water consumption at the site. If both values are equal, or if a surplus is generated, then the Proposed Development will comply with or potentially provide an additional positive contribution to the water neutrality ambitions in the SNWSZ. However, if anticipated consumption is higher than historical consumption, then the difference between the two must be offset within the region to achieve HDC's definition of water neutrality.

3.1.2 This section sets out the baseline water demand from the Proposed Development in line with guidance from Horsham District Council (Horsham District Council, 2025). As the existing staff facilities block is part of the larger Christ's Hospital site, metered water bills are not available for the individual block. As such, the historical/existing baseline water consumption, expressed in litres per person per day (l/p/d), has been calculated through utilisation of the BREEAM Wat 01 water calculator for commercial use, as advised by HDC (Horsham District Council, 2015).

3.1.3 A micro-component analysis has been used in the BREEAM Wat 01 calculator which calculates water consumption (l/p/d) based on the flow rates and water consumption attributes of sanitary ware, multiplied by a 'use factor' specified in the BREEAM Wat 01 calculator, which is based on how often they are likely to be used. An *'office'* building type was used within the BREEAM Wat 01 calculator as this was most fitting for the Proposed Development. The main building activity area selected was the *'Fitness suite (with changing facility and showers)'* as this contains the same water consuming sanitary ware as the Proposed Development.

3.1.4 It should be noted that a singular shower located on the ground floor of the existing staff facilities building has not been included in the baseline consumption calculations due to it being redundant after previous refitting of the block from earlier use as a decant boarding block. Details of the make/model/flow rate of this shower could not be identified.

3.1.5 The toilet flush consumption rates, and flow rates for the bathroom taps are presented in the water fittings schedule in Table 2-1. When considering dual flush toilets, BREEAM determines effective flush volume (EFV) for a dual flush toilet as the ratio of full flush to reduced flush; this is taken to be one full flush for every three reduced flushes, for non-residential buildings (BREEAM, 2020). Hence a figure of 4.50 litres has been used in Table 3-1, being the value calculated in this way from the flows reported in Table 2-1.

3.1.6 Based on the water fittings schedule, the existing building is estimated to have a micro-component consumption of 25.58 l/p/d, as illustrated in Table 3-1 overleaf.

Table 3-1 BREEAM Wat 01 water efficiency calculator – baseline micro-component consumption

WC component - all activity areas	Units	Specification	Usage/person/day	Usage factor	Consumption (L/person/day)
WC - male (no urinals installed)	Effective flush volume (Litres)	4.50	4.00	1.00	9.00
WC - female	Effective flush volume (Litres)	4.50	4.00	1.00	9.00

Taps components (personal hygiene) - all activity areas					
	Units	Specification	Usage/person/day	Usage factor	Consumption (L/person/day)
Wash hand basin taps	Flow rate (litres/min)	11.20	4.00	0.25	7.58

	Micro-component Consumption (L/person/day)
Total consumption	25.58

4 Proposal Demand

4.1 Micro-consumption analysis estimation

4.1.1 This section will calculate the anticipated water demand arising from the Proposed Development. The anticipated water consumption of the Proposed Development, expressed in litres per person per day (l/p/d), has also been calculated through utilisation of the BREEAM Wat 01 water calculator for commercial use, as advised by HDC (Horsham District Council, 2015).

4.1.2 The toilet flush consumption rates, and flow rates for the shower and bathroom taps are presented in the water fittings schedule in Table 2-2. Again, the BREEAM method for calculating EFV for dual flush WCs was used (BREEAM, 2020). Hence, a figure of 3.60 litres has been used in Table 3-1, being the value calculated in this way from the flows reported in Table 2-2 Water fittings schedule.

4.1.3 Based on the water fittings schedule, the Proposed Development is anticipated to have a water consumption of 19.96 l/p/d, as illustrated in Table 4-1 overleaf.

Table 4-1 BREEAM Wat 01 water efficiency calculator – anticipated micro-component consumption

WC component - all activity areas	Units	Specification	Usage/person/day	Usage factor	Consumption (L/person/day)
WC - male (urinals installed)	Effective flush volume (Litres)	3.60	1.00	1.00	1.80
WC - female	Effective flush volume (Litres)	3.60	4.00	1.00	7.20
Waterless urinals	Flush volume (Litres)	Waterless urinal specified	3.00	1.00	0.00
	No. urinal bowls	1.00			

Taps components (personal hygiene) - all activity areas					
	Units	Specification	Usage/person/day	Usage factor	Consumption (L/person/day)
Wash hand basin taps	Flow rate (litres/min)	6.00	4.00	0.25	4.06
Shower use	Flow rate (litres/min)	8.00	0.154	5.60	6.90

	Micro-component Consumption (L/person/day)
Total consumption	19.96

4.2 Occupancy and anticipated consumption

4.2.1 As described in Section 2, the Proposed Development is a one storey building with separate ladies and gents WCs and associated changing rooms on the first floor. The number of staff using the staff facilities building will remain the same as at present.

4.2.2 The number of staff using the new/existing staff facilities building has been provided to us by CHF. There are 15 members of staff based full time in the Supportive Services block which utilises the staff facilities building as their main restrooms. There are an additional 67 transient members of staff who generally use the staff facilities building at the start/end of their shift but work across the Christ's Hospital site during the day and thus utilise public facilities across the site throughout the day. As transient staff only use the staff facilities during less than 1 hour of their shift (assumed 10 hour shift), we have reduced the usage duration from 10 hours to one hour for transient staff in our calculations.

4.2.3 The number of staff utilising the staff facilities building can be used to calculate the estimated total water consumption at present and the anticipated water demand for the Proposed Development. When considering the 15 full-time staff and 67 transient staff using the facilities, there is an estimated total existing water consumption of **555 litres/day** ((25.58 * 15) + (2.558 * 67)). The total anticipated water demand of the Proposed Development is **433 litres/day** ((19.96 * 15) + (1.996 * 67)).

4.2.4 It should be noted that the total calculated water demand for the Proposed Development is likely to be higher than in practice. CHF have advised that *"The showers are primarily intended for use in the event of a 'bio-hazard' occurring during the course of work. We would estimate 1-2 showers per week in total across all users."* As the BREEAM Wat 01 water consumption calculator assumes the showers to be in use each day, it is probable that the quantity of water consumption at the site will be lower than predicted.

4.3 Water neutral?

4.3.1 As mentioned in Section 2, HDC defines water neutrality as:

"Development that takes place which does not increase the rate of water abstraction for drinking water supplies above existing levels."

4.3.2 Water neutrality can therefore be assessed by establishing the difference between existing (baseline) levels and anticipated levels arising from the Proposed Development.

4.3.3 As discussed in Section 3, the baseline water demand at the site is **25.58 l/p/d**.

4.3.4 The difference between the baseline and proposed micro-component consumption and total consumption is shown in Table 4-3. The results show that there would be a decrease in average water consumption relative to the baseline as a result of the Proposed Development. This would be a decrease of **5.62 l/p/d**, which amounts to a

total reduction of approximately **122 litres/day** based on the number of staff using the facilities. Therefore, the Proposed Development can be determined to be better than water neutral and no offsetting measures are required. A meter will be fitted to the new block so that water consumption in operation can be measured to verify its actual usage rates.

Table 4-2 Determining water neutrality

Consumption Period	Staff Facilities micro-component consumption (l/p/d)	Total Consumption (litres/day)
Baseline	26	555
Anticipated	20	433
Difference	-6	-122

5 Efficiency and offsetting measures

5.1 Efficiency and offsetting hierarchy

5.1.1 As advised by HDC, reducing water consumption in the Proposed Development through the installation of water efficient fittings and appliances should be considered before offsetting.

5.1.2 As presented in Table 2-2 and Table 4-1, the Applicant has proposed to install water-efficient sanitary ware throughout the Proposed Development, resulting in a micro-component consumption of less than 20 l/p/d. The micro-component consumption is over l/p/d more efficient than the requirements set out by Policy 37 (Sustainable Constructio90n) of the Horsham District Planning Framework 2015 (Horsham District Council, 2015). Hence, it is deemed that the reduction of water consumption through the installation of water efficient fittings and appliances has been adequately considered and resulted in a better than water neutral development.

Conclusion

5.1.3 This Water Neutrality Statement has been prepared for the proposed replacement of the existing staff facilities building at Christ's Hospital, Horsham, West Sussex, RH13 0LJ with a new staff facilities building, including showers. The statement sets out the existing baseline of **555 litres/day** water consumption and an estimate of anticipated water consumption of **433 litres/day** by the staff utilising the Proposed Development in line with Horsham District Council's guidance.

5.1.4 The Proposed Development would therefore be better than water neutral.

5.1.5 The need for a Water Neutrality Statement is in the context of the current delay to the Horsham District Local Plan following the release of Natural England's position statement regarding the use of water within the Sussex North Water Supply Zone (SNWSZ). The consequence of this has been to delay development which may contribute to wider social, economic and environmental commitments made by Horsham District Council. This application, along with others, is being progressed and provides a better than water neutrality solution through offsetting to enable much-needed sustainable development to proceed. Horsham District Council, Southern Water and Natural England are working in partnership towards a strategic Water Neutrality Strategy for the area. In parallel, Southern Water is working on its Water Resource Management Plan 2024, and a Sustainability Report, which is addressing the same matters.

5.1.6 Regardless of these ongoing developments to policy, the Proposed Development Christ's Hospital, Horsham offers a reduction in overall water demand due to an increase in water efficiency.

5.1.7 Without prejudice to the view that the competent authority for water abstraction licensing is the Environment Agency, the evidence provided in this Water Neutrality Statement provides a firm basis and strong incentive to progress the planning application from a water neutrality perspective.

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