Technical Note 1: Water Neutrality Statement

Site: Sincox Lane, Shipley
Prepared by: Laura Jagiela
Approved by: Neil Jaques
Date: 26 September 2024

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1.0 Introduction

1.1 This Water Neutrality Statement (WNS) has been prepared on behalf of Forays Homes to demonstrate how the proposed development will achieve water neutrality.

1.2 Following the issue of Natural England's (NE's) Position Statement on Water Neutrality within the Sussex North Water Supply Zone (SNWSZ) it is understood that Horsham District Council require all new and reserved matter planning applications to demonstrate that the development is water neutral. NE's Position Statement can be found in full within **Appendix A**.

1.3 The SNWSZ covers part of the Horsham District, as well as parts of the neighbouring Chichester, Arun and Crawley Districts. A plan showing the supply area can be found in **Appendix B**.

1.4 This statement sets out the following:

- Baseline Calculations for the existing development;
- Additional demand as a result of the proposed development;
- Water reduction measures, such as water efficient fixtures and fittings and rainwater harvesting; and
- Measures to offset any remaining deficit following the above.

2.0 Background

2.1 The proposed development is located along Sincox Lane in Shipley.

2.2 The existing site consists of a brownfield site with areas of hard landscaping.

2.3 The site has an extant planning consent for a commercial development and a copy of the site layout can be found in **Appendix C**.

2.4 The site proposals include the construction of eight dwellings, comprising a mix of two-bedroom, three-bedroom and four-bedroom houses. A copy of the proposed site layout can be found in **Appendix D**.

3.0 Baseline Calculations

3.1 It is proposed to offset the site against the existing extant consent, which comprises of eight commercial units with a B1 use classification.

3.2 Employment densities have been taken from the OffPAT Employment Densities Guide. The guide states that there will be one full time employee (FTE) per 13m². This equates to 95 employees based on a lettable floor area of 1,235.52m².

3.3 Water usage calculations for the development are based on the BREEAM 2014 Water Calculator. A copy of the calculations and the table summarising the flow restrictions per use are provided in **Appendix E**.

3.4 The baseline calculations give a water usage of 2,062.40 litres per day. A copy of the calculations can be found in **Appendix F**.

4.0 Additional Demand

4.1 The proposed development consists of two two-bedroom, four three-bedroom and two four-bedroom homes.

4.2 The average occupancy levels for each dwelling size have been based on local census date (agreed by Horsham District Council) and it is summaries in Table 4.1 below.

1-bedroom	2-bedroom	3-bedroom	4-bedroom
1.32	1.88	2.47	2.86

Table 4.1 - Occupancy level per dwelling size

4.3 Using the above census data, the population of the proposed development is estimated to be 19.36.

4.4 Part G of the current Building Regulations recommends that all developments achieve a water consumption of 125 litres per person per day.

4.5 Using the Building Regulations water consumption figure of 125 litres per person per day and population size of 19.36 it is estimated that the total water usage per day for the proposed development would be 2,420 litres per day.

4.6 Following the construction of the proposed development there will be an increase in water demand of 2,420 litres per day. This is greater than the baseline water usage for the site, thus water reduction measures need to be found to make the proposed development water neutral.

5.0 Water Reduction Measures

5.1 To minimise the water use of the development water efficient fixtures and fittings will be incorporated, which will reduce the water consumption to less than is required by Building Regulations (limit of 125 litres per person per day).

5.2 A water calculation in accordance with Building Regulations Part G has been carried out and confirms that the proposed development will achieve a water consumption of 93.99 litres per person per day, which includes an allowance of 5 litres per person per day for external water usage. A copy of the Part G calculation can be found in **Appendix G** and is summarised in Table 5.1, below:

	Total Water Usage (l/p/day)
WC (full flush)	6.57
WC (part flush)	8.88
Taps (Excluding Kitchen)	5.85
Bath	16.50
Shower	26.22
Kitchen Taps	12.12
Washing Machine	17.16
Dishwasher	4.50
Total	97.79
Normalisation Factor	0.91
Total	88.99
External Water Use	5.00
Total	93.99

Table 5.1 – Water Usage

5.3 A copy of the proposed fixtures and fittings to achieve the above water consumption can be found in **Appendix H**.

5.4 Using the Part G water consumption figure of 93.99 litres per person per day and a population size of 19.36 it is estimated that the total water usage per day for the proposed development can be reduced to 1,819.68 litres per day, which is a reduction of 242.72 litres per day over the baseline water usage. This position is, therefore, water neutral.

6.0 Offsetting Measures

6.1 Mains water demand can be managed through the design of the fixtures and fittings of the proposed development, thus water neutrality is achieved on site and the development has demonstrated an overall reduction in mains water use, thus further offsetting is not required.

7.0 Summary and Conclusions

7.1 This Technical Note sets out the water usage strategy for the proposed development at Sincox Lane, Shipley.

7.2 The proposal is to incorporate water efficient fixtures and fittings to the proposed dwellings.

7.3 The proposed development can demonstrate water neutrality without further offsetting being required.

7.4 This strategy will minimise the impact of the new development on the Sussex North Supply Zone. The Water Usage Strategy confirms the proposal will be water neutral once complete and therefore satisfying Natural England's requirements.

Appendix A

Natural England’s Position Statement

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.**

Appendix B

Sussex North Water Supply Zone

East Hampshire District

Waverley District (B)

Mole Valley District

Crawley District (B)

Chichester District

Horsham District

Mid Sussex District

Arun District

Borough of Adur & Worthing

Local Planning Authorities

Sussex North WRZ DEFRA

Horsham District Council

Parkside, Chart Way, Horsham
West Sussex RH12 1RL.
Barbara Childs : Director of Place

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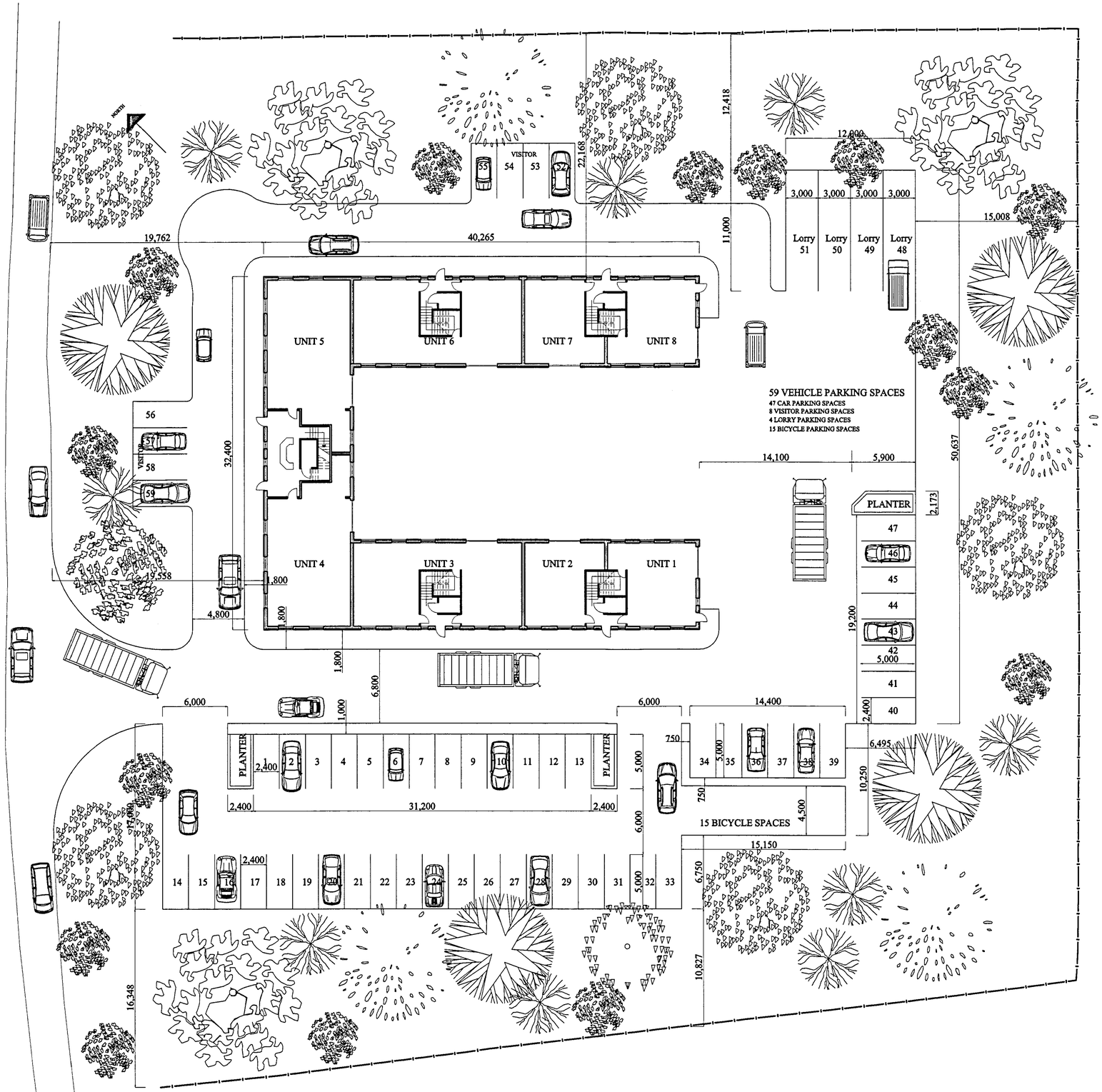
Sussex North Water Resource Zone

Chichester Horsham Crawley

Reference No :		Date : 23 November 2021	Scale : 1:3,000 at A2
Drawing No:	Drawn :	Checked :	Revisions :

Appendix C

Existing Site Layout and Floor Plan



SITE PLAN

GENERAL NOTES

This drawing is not to be scaled: work to figured dimensions only, confirmed on site.

To be read in conjunction with all Architectural drawings, detailed specifications where applicable and all associated drawings in this series.

Any discrepancy on this drawing is to be reported immediately to Hemsley Consulting Limited for clarification.

The Contractor is responsible for all temporary works and for the stability of the works in progress.

Revisions	Date	No.
Visitor parking and new circulation route shown as Clients instructions.	17.12.03	C
Plan amended in accordance with Clients requirements.	04.12.03	B
Plan amended in accordance with Clients requirements.	26.11.03	A

Hemsley Consulting Limited
Consulting Civil and Structural Engineers
Unit 9, Park Farm
Hundred Acre Lane
Wivelsfield Green
West Sussex RH17 7RU
Tel. 01273 891738
Fax. 01273 891420
E.mail hemcons@compuserve.com

Client
SINCOX LANE DEVELOPMENTS LTD.

Project
Erection of Two-Storey B1 Units
At Sincox Lane Shipley

Title
Site Layout

Scale 1:200

Drawn J.Hartie
Checked J.Hemsley
Approved

Date 19.11.03

Drawing Number
3055 - 01

Rev C



GROSS INTERNAL FLOOR AREA

UNITS	1278	59·29 M²
UNITS	3456	120·89 M²
TOTAL		720·44 M²

GROUND FLOOR PLAN

Notes:
DO NOT SCALE. All dimensions must be checked/verified on site.

HORSHAM DISTRICT COUNCIL
APPROVED
26 MAR 1999
UNDER
TOWN & COUNTRY PLANNING ACTS

HORSHAM DISTRICT COUNCIL
DEPOSITED PLAN
Recd - 1 OCT 1998
No. SP148/98
TP45/98

Date	Revisions

Coloured Copy

Client
MAUDLIN PROPERTIES Ltd

Job Title
REPLACEMENT COMMERCIAL BUILDING
ARUN FEED MILLS
SHIPLEY

Drawing Title
GROUND FLOOR PLAN

Scale	Date	Drawn by
1:100	6:8:98	

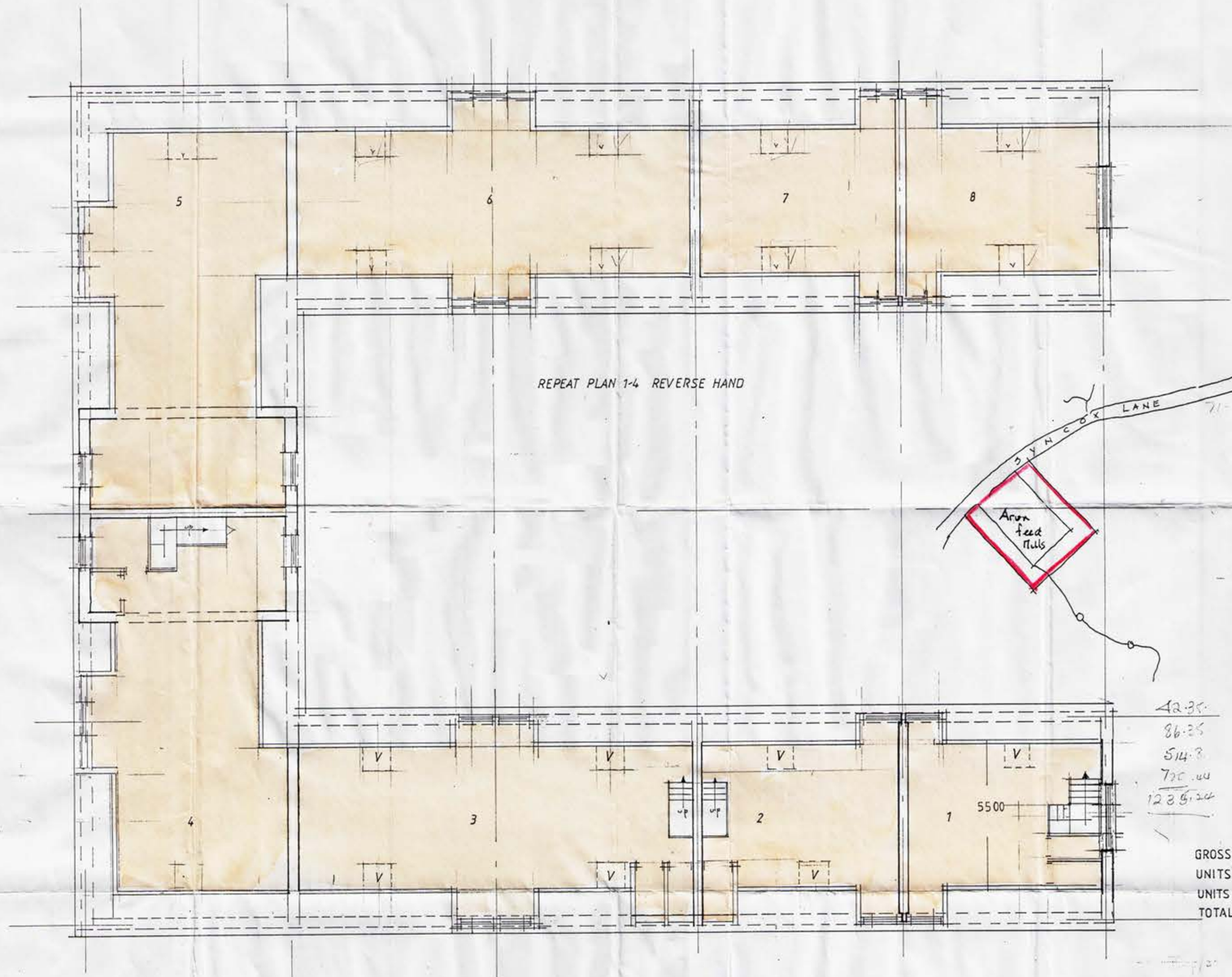
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594 x 841 mm A1

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Notes:
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REPEAT PLAN 1-4 REVERSE HAND

FIRST FLOOR PLAN

SITE PLAN 1:2500

42·35
86·35
514·8
735.44
1288.24

GROSS INTERNAL FLOOR AREA

UNITS 1·2·7·8	42·35 M²
UNITS 3·4·5·6	86·35 M²
TOTAL	514·8 M²

1286.24
13,288

HORSHAM DISTRICT COUNCIL
DEPOSITED PLAN
Recd - 1 OCT 1998
No. SP/48/98
(T/45/98)

Date	Revisions

Coloured Copy

Client
NAUDIN PROPERTIES Ltd

Job Title
REPLACEMENT COMMERCIAL BUILDING
ARUN FEED MILLS
SHIPLEY

Drawing Title
FIRST FLOOR PLANS
SITE PLAN

Scale	Date	Drawn by
1:100	5:8:98	JDB.

J D BARNDEN MA B Sc
LITTLE HEDGES HIGHLANDS AVENUE
UCKFIELD TN225TD Tel 01825768049

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594 x 841 mm A1

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Appendix D

Proposed Site Layout and Floor Plan



Proposed Site Plan - showing Roof plan

0 2.5m 5m 7.5m 10m 12.5m

NOTES
Check all dimensions on site. Do not scale from this drawing.
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Revisions

Project
Arun Mills
Sincox Lane
Shipley

Client
FORAYS HOMES

Title
Site Plan

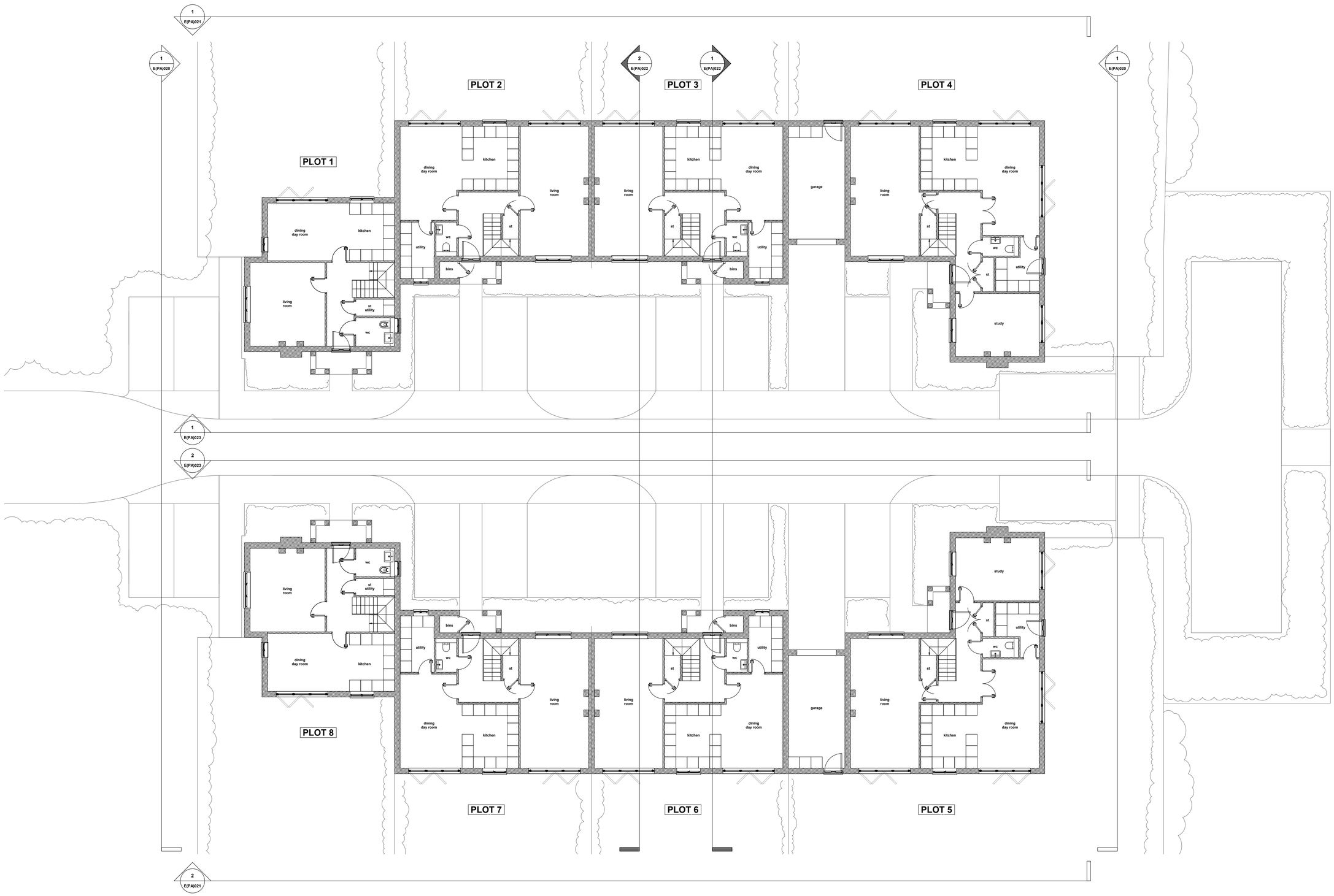
- Proposed showing Roof Plan

Drawing No. 19.004.L(PA)010
Revision A

Scale @ A1 1:250
Drawn SC

Date 01.12.2022
Checked *

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Proposed Ground Floor Plans

0 1m 2m 3m 4m 5m

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Revisions

Project
Arun Mills
Sincox Lane
Shipley

Client
FORAYS HOMES

Title
Proposed Floor Plans
- Ground

Drawing No. | Revision
19.004.L(PA)015 | *

Scale @ A1 | Drawn
1:100 | SC

Date | Checked
01.12.2022 | *

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Proposed First Floor Plans

0 1m 2m 3m 4m 5m

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Revisions

Project
Arun Mills
Sincox Lane
Shipley

Client
FORAYS HOMES

Title
Proposed Floor Plans
- First

Drawing No. 19.004.L(PA)016
Revision *

Scale @ A1 1:100
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Date 01.12.2022
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Appendix E

BREEAM Flow Restrictions

Date: 22/06/2023

Project Name: Sincox Lane, Shipley

Floor Size: 1,235.52m²

BREEAM Water Calculation Summary		
Fitting	**Default Input**	**Remarks**
WC's	6 l/flush	12.00 l/person/day
Wash hand basin	12 l/min	8.12 l/person/day
Fixed Water Use	n/a	1.58 l/day
Total Demand		**21.7 l/person/day**

Source: BREEAM 2014 Water Calculator Manual

Table 43 Water efficient consumption levels by component type

Component	Performance Levels (quoted numbers are minimum performance required to achieve the level)						
	Base	1	2	3	4	5	Unit
WC	6	6	4.5	4	3.75	3	Effective flush volume (litres)
Wash hand basin taps	12	9	7.50	4.50	3.75	3	litres/min
Showers	14	10	8	6	4	3.50	litres/min
Baths	200	180	160	140	120	100	litres
Urinal (2 or more urinals)	7.50	6	3	1.50	0.75	0	litres/bowl/hour
Urinal (1 urinal only)	10	8	4	2	1	0	litres/bowl/hour
Greywater/ rainwater system	0	0	0	25	50	75	% of WC/urinal flushing demand met using recycled non-potable water
Kitchen tap: kitchenette	12	10	7.50	5	5	5	litres/min
Kitchen taps: restaurant (pre-rinse nozzles only)	10.30	9	8.30	7.30	6.30	6	litres/min
Domestic sized dishwashers	17	13	13	12	11	10	litres/cycle
Domestic sized washing machines	90	60	50	40	35	30	litres/use
Waste disposal unit	17	17	0	0	0	0	litres/min
Commercial sized dishwashers	0	7	0	5	4	3	litres/rack
Commercial/ industrial sized washing machines	14	12	10	7.50	6	4.50	litres/kg

BREEAM 2014 Wat 01 Water consumption: Water efficiency calculator for new non domestic office buildings

Building details

Building name	Sincox Lane, Shipley
BRE assessment reference no.	N/A

Building type	Description of building type	Default occupancy	Default annual days/operation	Default daily hours of operation
Office	TCP Classification B1: Offices and workshop business (including those with a basic (category 1) laboratory area)	137.14272	253	10

Main building activity areas	Description of activity area	Activity area present in building?	Net Floor Area (m^2)
Office - Office areas	Cellular or open plan office space, including staff kitchen where present/adjacent and reception areas. Exlcude meeting rooms, visitor waiting or circulation areas.	Yes	1235.52
Office - Small workshop / laboratory space	Small scale workshop or category 1 laboratory area	No	
Office - Staff canteen dining area	Seated dining areas that accompany a permanently staffed kitchen preparing food for consumption on the premises (excludes small un-staffed kitchen's used by office staff to re-heat food, make tea etc.)	No	
Office - Fitness suite/gym (with changing facility and showers)	A fitness suite or gym that is part of the office building/development and used by the building's employees only. The gym will have its own changing facility with showers.	No	

Water consumption - building microcomponent

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)		4.00	1.00	0.00
WC - female	Effective flush volume (Litres)	6.00	4.00	1.00	12.00

Urinal component - all activity areas	units	Specification	No. of cisterns	Flushing frequency (flushes/hour)	Consumption (L/person/day)

	units	Specification	Usage/person/day	Usage factor	Consumption (L/person/day)

	units	Specification	Usage/person/day	Usage factor	Consumption (L/person/day)

	units	Specification	Usage/person/day	Usage factor	Consumption (L/person/day)
Taps components (personal hygiene) - all activity areas					
Wash hand basin taps	Flow rate (litres/min)	12.00	4.00	0.25	8.12
Shower use	Flow rate (litres/min)		0.030	5.60	0.00
Fixed use - vessel filling	Litres/person/day	-	-	-	1.58
Tap components (cleaning) - staff kitchenette					
Kitchen taps - kitchenette	Flow rate (litres/min)		1.00	0.67	0.00
Dishwasher	Litres/cycle		0.04	1.00	0.00
Tap components (cleaning and food preparation) - staff canteen food preparation area					

	Microcomponent consumption (L/person/day)
Total	21.70

Appendix F

Water Usage Calculations

Offpat Employment Densities

Units	Area per FTE (m^2)	Floor Area per Unit (m^2)	Number of Units	Occupancy per Unit	Total Occupancy	Total Floor Area
1, 2, 7 + 8	13	101.64	4	7.82	31.27	406.56
3, 4, 5 + 6	13	207.24	4	15.94	63.77	828.96
					95	1235.52

	Total Water Use (litres per day)			
Performance Levels	WC's	WHB	Drinking	Total
Base	1140.5	771.7	150.2	2062.4

	Base
Fixtures	Water Use (l/p/d)
WC's	12
WHB	8.12
Drinking	1.58
Totals	21.7

Appendix G

Part G Calculations

Proposed Water Usage

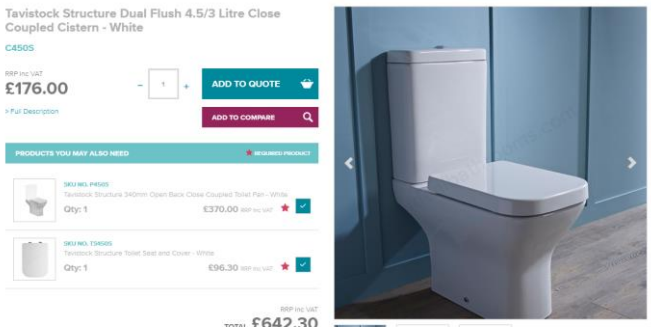
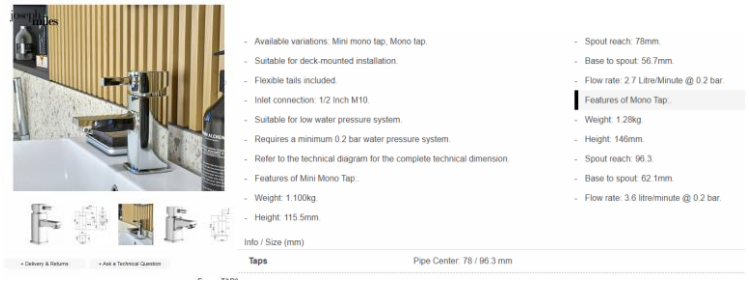
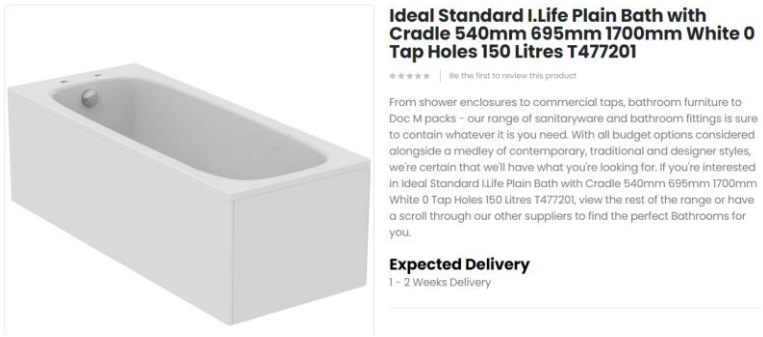
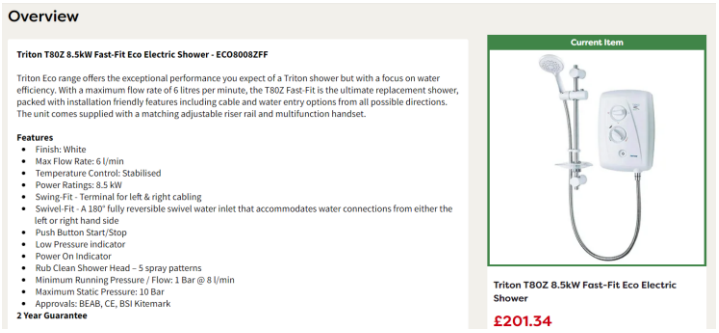
Fixture	Capacity/Flow Rate	Use Factor	Fixed Use	litres/person/ day
WC (Single Flush)		4.42		0.00
WC (Dual Flush)	4.5	1.46		6.57
WC (Dual Flush) Part	3	2.96		8.88
Taps (excluding kitchen)	2.7	1.58	1.58	5.85
Bath (where shower present)	150	0.11		16.50
Shower (where bath present)	6	4.37		26.22
Bath Only		0.5		0.00
Shower Only		5.6		0.00
Kitchen Sink	4	0.44	10.36	12.12
Washing Machine	8.17	2.1		17.16
Dishwasher	1.25	3.6		4.50
	Total calculated use (litres/person/day)			97.79
Normalisation Factor				0.91
Total Water Consumption (CSH) (litres/person/day)				88.99
External Water Use				5.00
Total Water Consumption (Part G) (litres/person/day)				93.99

	Number of units	Census	Population	Mains Water Usage
Proposed 2-bedroom	2	1.88	3.76	353.41
Proposed 3-bedroom	4	2.47	9.88	928.64
Proposed 4-bedroom	2	2.86	5.72	537.63
Totals	8		19.36	1819.68

Appendix H

Fixtures and Fittings Specifications

Fixtures and Fittings - Part G Specifications

Item	Capacity/Flow rate	Overview
Toilet (Dual Flush)	4.5/3 litres	Tavistock 
Basin Tap	2.7 litres/minute	Joseph Miles 
Bath	150 litres	Ideal Standard 
Shower	6 litres/minute	Triton 

Kitchen Sink	4 litres/minute	Tap with flow regulator - Affinity by Moores  Utility Chrome utility lever sink mixer tap Tap Height: 380mm Order code: 805 56 Flow Regulator:  • Tap tail type flow limiters are suitable for most Bristan basin, pillar taps, basin and sink mixers. • Operating pressure range – Min. 1.0 bar Max. 5.0 bar. • All flow limiters accurate +/- 10%. • Flow limiting flow straighteners aerates the water for a softer non-splashing flow. • Flow limiting flow straighteners can be easily retro fitted in tap spout (dependent on tap/mixer model). Colour / Flow Rate limited to: / Order Code Pink – 1 litre per minute – 806 37 Olive – 2 litres per minute – 806 38 Brown – 3 litres per minute – 806 39 Grey – 4 litres per minute – 806 40 Yellow – 5 litres per minute – 806 41 Black – 6 litres per minute – 806 42