



WATER EFFICIENCY IN SUSSEX NORTH

BACKGROUND

In September 2021, Natural England issued a [position statement](#) to several authorities in Sussex North, indicating concerns with environmental impacts on internationally protected sites in the Arun Valley, suspected to be linked to abstraction of drinking water in the catchment by Southern Water.

The position statement sets out that any new development coming forward in the affected area, must be “water neutral”, which Natural England define as *“the use of water in the supply area before the development is the same or lower after the development is in place.”* The area affected by the position statement covers parts of Crawley Borough, Horsham District, Mid Sussex District, Chichester District, and areas of the South Downs National Park in those districts. Applications from the county authority, West Sussex County Council, are also affected.



In practice, this means that new development needs to be built to high water efficiency standards, such as by installing water efficient appliances, or including rainwater harvesting or water recycling schemes. Any remaining additional water use will then need to be ‘offset’ elsewhere within the affected area. Essentially, making new development as water efficient as possible helps to reduce the amount of offsetting that is required to achieve water neutrality.

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

Sussex North Offsetting Water Scheme, or SNOWS – to support applicants in offsetting the remaining water use of their developments.

WHAT DO HIGHER WATER EFFICIENCY STANDARDS MEAN FOR RESIDENTS?

Most residents will notice no discernible difference between a property built to a higher water efficiency standard than one built to existing standards. In many cases, the higher efficiency is achieved simply by the addition of more water efficient fixtures and fittings. In some developments, there may be additional technical solutions to reducing water consumption, such as rainwater harvesting systems that re-use collected rainwater usually to supply outside taps, washing machines and toilets.



There are multiple benefits in building more water efficient developments. Residents of these developments will benefit from lower water bills and – depending on the water efficiency measures used – could also benefit from reduced gas bills because of lower water heating costs. Importantly, the natural environment benefits from reduced pressure on the supply of fresh water, whilst maintaining the ability of local planning authorities to deliver the housing and growth that is necessary for their areas.

It is important to clarify that higher water efficiency standards do not mean that residents will be in any way limited to using 85 litres per person per day. Residents can still use as much water as their needs demand, they will just be using water more efficiently. Likewise, residents are still free to remove and replace any fixtures and fittings as they wish. There is no obligation on property owners to maintain their property to any water efficiency standard. However, due to the environmental benefits from these water efficient devices and as residents' water use behaviour changes, many may choose to retain these fixtures and fittings.

ISN'T WATER USE MUCH HIGHER THAN 85 LITRES PER PERSON PER DAY?

The latest estimates from Southern Water are that the average water use in their 'Central Zone' is 139 litres per person per day.

This average water use figure accounts for a wide range of development types with varying standards of water efficiency in their use. Lots of development was built prior to the 2010 introduction of water efficiency standards in new development. Water use because of inefficient fixtures and fittings, and little to no water recycling, will result in higher average water use than found in most modern, more water efficient developments.

It is true that a new development built to a standard of 85 litres per person per day will not demonstrate those values across the board. Consumer behaviours play some role in the overall water efficiency of individual households. Over time, there will



inevitably be some reduction in efficiency as fixtures and fittings deteriorate or are replaced with less efficient equivalents. This situation would also occur in a property built to a lower water efficiency standard, such as the current 110 litres per person per day Building Regulations standard. Overall, it will be positive that new development across Sussex North will be starting from a lower baseline of water consumption. It will have immediate benefits to the wider natural environment.

The proposed local authority-led water offsetting scheme, SNOWS, will take account of the anticipated reduction in water efficiency over the lifetime of new development to ensure that any development using the scheme remains water neutral for as long as the water neutrality requirements are in place.

WHO ELSE IS INVOLVED WITH THE WATER SCARCITY ISSUES IN SUSSEX NORTH?

There is a governance structure set up jointly by the affected Sussex North authorities to respond to the various issues associated with water neutrality. The governance structure also includes representation from:

- Southern Water
- Ofwat
- Department for Levelling Up, Housing and Communities (DLUHC)
- Department for Environment, Food & Rural Affairs (Defra)
- Natural England
- Environment Agency

In late 2023, a DLUHC Ministerial Statement was issued encouraging local planning authorities to work with government agencies to incorporate tighter water efficiency standards than currently allowed by Building Regulations in areas where development is currently held up. This statement affirms the policy position being taken by the Sussex North authorities.

Government is also, through Defra and others, making policy and guidance updates to improve water efficiency and address water scarcity issues nationally. Many of these actions are identified in the government's [Plan for Water](#). An example is the introduction of [mandatory water labelling on household goods](#). These measures will help consumers make more informed choices about the water efficiency of these goods and, coupled with other government actions, should help to reduce overall water consumption.

Southern Water is responsible for providing fresh water to new developments in Sussex North. The Sussex North authorities are working closely with Southern Water to manage the overall demand for water from local plan growth. The local authority-led offsetting scheme, SNOWS, will supplement Southern Water's own demand reduction measures to allow new development to proceed as 'water neutral'. Ultimately, it is for Southern Water to develop new water supply sources during the next 5 to 15 years to mitigate the current impacts requiring a water neutral approach.

