

Date: 26 August 2025
Our ref: 552519
Your ref: DC/25/0523



Horsham District Council
planning@horsham.gov.uk

Hornbeam House
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BY EMAIL ONLY

Dear Sir/Madam

Planning consultation: Erection of 18no. 2, 3 and 4 bedroom dwellings, (including 6no. affordable housing units), together with access from East Street, vehicle and cycle parking, landscaping and open space, and sustainable drainage.

Location: Land North of East Street, Rusper, West Sussex

Thank you for your consultation on the above dated 06 August 2025 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE

NO OBJECTION - SUBJECT TO APPROPRIATE MITIGATION BEING SECURED

Natural England considers that without appropriate mitigation the application would:

- have an adverse effect on the integrity of Arun Valley Special Area of Conservation, Special Protection Area and Ramsar site <https://designatedsites.naturalengland.org.uk/>.
- damage or destroy the interest features for which Amberley Wild Brooks and Pulborough Brooks Site of Special Scientific Interest has been notified.

In order to mitigate these adverse effects and make the development acceptable, the following mitigation measures are required / or the following mitigation options should be secured:

- The delivery, management and maintenance of any measures identified and considered within your appropriate assessment.

We advise that an appropriate planning condition or obligation is attached to any planning permission to secure these measures.

A lack of objection does not mean that there are no significant environmental impacts. Natural England advises that all environmental impacts and opportunities are fully considered and relevant local bodies are consulted.

Natural England's further advice on designated sites/landscapes and advice on other natural environment issues is set out below.

Habitats Regulations Assessment

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.

Further Advice on Mitigation

The proposed development falls within the [Sussex North Water Supply Zone](#) (SNWSZ). As set out in Natural England's [Advice Note](#) regarding planning applications within the SNWSZ, the existing water supply in the zone cannot be ruled out as contributing to the declines in wildlife within the internationally protected Arun Valley SPA, SAC and Ramsar sites. Ensuring that there is no net increase in water consumption is recognised as a suitable method to rule out potential adverse effects on the integrity of these sites arising from development.

The applicant has undertaken a water neutrality assessment which demonstrates that the proposal will be water neutral and will therefore not result in an adverse effect on the integrity of the Arun Valley designated sites. The submitted documents state that there is no existing water use and the proposed water use of 4,457.2 litres per day will be offset, following installation of efficient appliances and either a contribution to a private water credit scheme or a contribution to the Sussex North Water Certification Scheme (SNWCS).

While we concur with the conclusions of the water neutrality assessment that the proposal achieves neutrality, we have the following comments to make on certain aspects of the assessment.

Proposed Mitigation

We note that the applicant intends to either pay into a private offsetting scheme run by Slade Farm or contribute to SNWCS to achieve neutrality at the proposed development, and therefore provide comment on both of the options below.

Private Water Credit Scheme – proposed borehole

The private offsetting scheme proposes to use a private borehole to supply water to Slade Farm, providing 7,619 litres of water per day. As the proposed borehole will abstract less than 20m³ per day, there was no requirement for the applicant to engage with the Environment Agency (EA) regarding an abstraction licence. They have however undertaken a hydrogeological assessment and produced a report which contains sufficient information to demonstrate to the satisfaction of your authority that the abstraction can be delivered in perpetuity. This report also demonstrates that the abstraction will not have a significant impact upon other nearby designated sites.

The submitted information confirms that the proposed borehole is not hydrogeologically connected to the Wealden Greensand Semi-Confined aquifer or impacted features of the Arun Valley designated sites. We are therefore satisfied that an adverse effect on the integrity of the Arun Valley sites can be ruled out. We do however advise that the monitoring, management and maintenance of the proposed borehole is secured in perpetuity and should a mains connection be required at any time, water neutrality should be considered appropriately.

Though the applicant has evidenced the water savings being made it does not appear that

contribution to the scheme has been secured. As competent authority you should be sure that any offsetting can be sufficiently secured in perpetuity. In addition, your authority should ensure that these 'water credits' generated by the offsetting cannot be utilised by any other developments within the Sussex North Water Resource Zone (i.e. double counting).

Contribution to SNWCS

Natural England notes that the remainder of the water use resulting from the proposed development (3,421.91 litres per day) may be offset via the Sussex North Water Certification Scheme (SNWCS). As detailed in our letter to your authority on 31 January 2025, we are satisfied that this measure is sufficient to rule out an adverse effect on the integrity of the Arun Valley sites and support your decision in apply Grampian-style conditions to secure it.

Final Comments

Please note that if your authority is minded to grant planning permission contrary to the advice in this letter, you are required under Section 281 (6) of the Wildlife and Countryside Act 1981 (as amended) to notify Natural England of the permission, the terms on which it is proposed to grant it and how, if at all, your authority has taken account of Natural England's advice. You must also allow a further period of 21 days before the operation can commence.

Further general advice on consideration of protected species and other natural environment issues is provided at Annex A.

If you have any queries relating to the advice in this letter please contact consultations@naturalengland.org.uk

We would not expect to provide further advice on the discharge of planning conditions or obligations attached to any planning permission.

Should the proposal change, please consult us again.

Yours sincerely

Taneisha Mallett
Central Casework Team