

Date: 06 August 2025
Our ref: 520483
Your ref: DC/25/0629



Horsham District Council
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BY EMAIL ONLY

Dear Sir/Madam,

Planning consultation: Residential development comprising approximately 206 dwellings, including the conversion of 'Building 3' and demolition of 'Building 36'. Vehicular access taken from Wimblehurst Road. Car and cycle parking, landscaping and open space and associated works. The replacement of the existing cedar trees at the site.

Location: Former Novartis Site Parsonage Road Horsham West Sussex

Thank you for your consultation on the above dated 22 July 2025 which was received by Natural England on 22 July 2025.

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 options should be secured:

- The use of water efficient fixtures and fittings as detailed in the water neutrality statement
- The appropriate contribution rate to the Sussex North Water Certification Scheme

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 internationally protected sites in the Arun Valley SPA, SAC and Ramsar site. 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 the existing water use is 0 litres per day and the proposed water use will be 31,917 litres per day following the implementation of water efficient fixtures and fittings, which will be mitigated through contribution to the Sussex North Water Certification Scheme.

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.

Water Neutrality Calculations

Rainwater Harvesting

We note that the applicant has proposed to install water butts to satisfy the external water demand at each house and has therefore removed the 5 l/p/d external water use allowance from the water budget. It is our advice that all mitigation measures, including the installation of water butts, must be sufficiently certain and likely to work in order to be considered at appropriate assessment. We would question whether there is enough certainty that occupants of the proposed dwellings will utilise the water butts, however it is up to you as competent authority to determine whether their use can be adequately secured.

If their use cannot be adequately secured, then we recommend that the water budget be recalculated to include external water use.

Total Site Occupancy Rate

We note that the total site occupancy has been calculated for each unit type using local census data however, there appears to be an error in the calculation for dwelling type 'C09' (p.10, Water

Neutrality Statement, dated 05 March 2025). We would expect the four 3-bedroom dwellings to have a total population of 9.88 rather than 7.41 meaning that the total site occupancy would be 384.88 people rather than 382.41. We recommend that your authority ensures that the total site occupancy and total daily water demand have been accurately calculated to ensure that the water use is fully mitigated.

Sussex North Water Certification Scheme (SNWCS)

We note that the applicant will be purchasing credits from the Sussex North Water Certification Scheme (SNWCS) or a suitable alternative bespoke offsetting scheme to offset 31,917 litres of water per day. Though this is an acceptable mitigation strategy, we recommend that your authority considers our advice provided above in relation to rainwater harvesting and total site occupancy rate.

If required, the financial contribution made to the credit scheme should be amended accordingly to ensure that the water use of the development is fully mitigated. If an alternative credit scheme will be used instead of SNWCS, this will need to be considered in an appropriate assessment and Natural England reconsulted.

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 me at Eleanor.Curran@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 faithfully,

Eleanor Curran
Sustainable Development Officer
Sussex and Kent