

[REDACTED]

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**From:** Moore, Sophie [REDACTED]  
**Sent:** 15 August 2022 16:22  
**To:** Planning  
**Subject:** DC/19/2464- NE Response

**Your Reference:** DC/19/2464  
**Our Reference:** 398630

**Proposal:** Water Neutrality Statement - Erection of 80 dwellings with associated access, parking and landscaping at Land West of Worthing Road (Phase 5), Southwater.

**Location:** Berkeley Homes Development Site, Worthing Road, Southwater RH13 9BT

Thank you for consulting Natural England on the above application.

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.

#### **FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON DESIGNATED SITES**

As submitted, the application could have an adverse effect on the integrity of the Arun Valley Special Protection Area (SPA), Special Area of Conservation (SAC) and Ramsar site (together the Habitats Sites).

Natural England requires further information in order to determine the significance of these impacts and the scope for mitigation.

Without this information, Natural England may need to object to the proposal.

#### **Habitats Regulations Assessment.**

Natural England notes that your authority, as competent authority, has undertaken an appropriate assessment of the proposals below 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, and a competent authority should have regard to Natural England's advice.

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 your assessment, and the measures proposed to mitigate for any adverse effects, Natural England's advice is that your assessment is not sufficiently rigorous or robust to justify this conclusion and therefore it is not possible to ascertain that the proposal will not result in adverse effects on the integrity of the sites in question. We advise that your authority should not grant planning permission at this stage.

We advise that the following additional work on the assessment (please see below) is required to enable it to be sufficiently rigorous and robust. We welcome ongoing engagement with your authority to address these matters. Natural England should be re-consulted once this additional work has been undertaken and the appropriate assessment has been revised.

#### **Additional Information required:**

- The submitted Water Neutrality Statement (March, 2022) proposes the use of water butts as a water saving measure, with the collected water intended for external use. It is our advice that the calculated savings from this (19,306.6 l/person/day) is not certain as it relies on people's behaviours and habitats (e.g. using water from the butt instead of a hosepipe to water plants). We recommend that either information is submitted to confirm how the savings will be secured, or an alternative water saving measure is proposed (e.g. rainwater harvesting).

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.

If you have any queries relating to the advice in this letter, please contact me at

[REDACTED]

Kind regards,

**Sophie Moore**

Advisor - Sustainable Development  
Sussex and Kent Team  
Natural England

Pronouns: She/Her - [Why have I put this?](#)

*Working Hours: Monday-Friday 8am-4pm*

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