Date: 10 July 2025
Our ref: 516838
Your ref: DC/24/1740

Halima Chowdhury
Planning
Horsham District Council
planning@horsham.gov.uk

BY EMAIL ONLY

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Ms. Chowdhury,

Planning consultation: Change Of Use of outbuilding formed to provide additional accommodation for existing dwelling to form an Air BnB building (Retrospective).
Location: Rushfold, Wheatsheaf Road, Henfield, West Sussex.

Thank you for your consultation on the above dated 20 June 2024 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

FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON DESIGNATED SITES

As submitted, the application could have potential significant effects on Arun Valley Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar site as well as Amberley Wild Brooks site of Special Scientific Interest (SSSI) and Pulborough Brooks SSSI. Natural England requires further information in order to determine the significance of these impacts and the scope for mitigation.

The following information is required:

- Revised Water Neutrality Statement with an evidenced occupancy rate for the existing dwelling and the removal of outdoor rainwater butts to offset external water use.

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

Please re-consult Natural England once this information has been obtained.

Natural England's further advice on designated sites/landscapes and advice on other 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, 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 the assessment, and the measures proposed to mitigate for any adverse effects, it is the advice of Natural England that it is not possible to ascertain that the proposal will not result in adverse effects on the integrity of the sites in question.

Natural England advises that the assessment does not currently provide enough information and/or certainty to justify the assessment conclusion and that your authority should not grant planning permission at this stage. Further assessment and consideration of mitigation options is required, and Natural England provides the following advice on the additional assessment work required.

Additional Information Required

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.

Natural England has considered the information provided in the submitted Water Neutrality Statement (16 June 2025) and Appropriate Assessment (20 June 2025) and advise that the following further information is required:

Water Neutrality Calculations

Occupancy Rates

We note that the submitted Water Neutrality Statement (16 June 2025) does not appear to confirm the number of bedrooms the existing dwelling has, and uses a bespoke occupancy figure of 2 persons p/unit. While the use of a bespoke figure is acceptable in principle, we require supporting evidence to ensure it is sufficiently robust and this does not appear to have been provided. We therefore recommend that the applicant submits evidence to support this figure, or utilises either a locally evidenced occupancy rate or the national figure of 2.4 persons.

Proposed Mitigation

Rainwater Harvesting

The applicant's proposed mitigation strategy includes the installation of outdoor water butts at the existing dwelling to offset external water use, and states that this should provide a water saving of 5 litres per person per day. We do not consider the use of outdoor water butts to provide sufficient certainty as a mitigation measure and therefore advise this figure is removed from the water neutrality calculations and more secure mitigation measure(s) are provided, should they be required.

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 28I (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 the 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 Hannah.Lee@naturalengland.org.uk.

Please consult us again once the information requested above, has been provided.

Yours sincerely,

Hannah Lee
Sustainable Development
Sussex and Kent Area Team