

Date: 10 November 2025



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BY EMAIL ONLY

Dear Adrian Smith,

Thank you for your consultation dated 04 November 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.

As you are aware, in September 2021 Natural England released a Position Statement stating that it could not be concluded that the existing abstraction within Sussex North Water Supply Zone was having no impact on the Arun Valley designated sites and therefore new development in this zone should demonstrate water neutrality.

On 31st October 2025, we wrote to the relevant local authorities to formally withdraw this Position Statement on the basis that a package of measures has been agreed which ensures no adverse effect on the integrity of the Arun Valley designated sites, without the need for development to demonstrate neutrality.

We note that your authority, as competent authority, feels that further information is required before you can be satisfied that the agreed package of measures can be sufficiently secured and effective in practice, namely the formal amendment of Southern Water's abstraction licence by the Environment Agency. Therefore, in the interim period, your authority has proposed to continue undertaking appropriate assessments and to utilise the demand capacity generated by Southern Water's efficiency savings originally planned to be used by the Sussex North Water Certification Scheme (SNWCS) to conclude no adverse effect on integrity.

Natural England advises the package of measures agreed with Southern Water, Natural England and the Environment Agency removes the risk of a likely significant effect. However, we acknowledge that your authority has proposed an alternative approach.

Natural England has previously reviewed and agreed the Southern Water efficiency savings figures (3.24Ml/day) referred to in your submitted Appropriate Assessment template. In the light of this, we are satisfied that they are reliable. Therefore, if consulted on future planning applications which seek to benefit from these efficiency savings, we will not raise an objection on the basis of adverse effect risk.

Please therefore take this letter as Natural England's formal response pursuant to Regulation 63(3) of the Conservation of Habitats and Species Regulations 2017 to all relevant planning applications which seek to achieve water neutrality using the Southern Water efficiency savings referred to

above. We welcome your proposal to have water neutrality officers monitoring all permissions granted within the supply zone to ensure the available capacity referred to is not exceeded and that you will update Natural England if capacity is approaching being reached.

Please be advised that your authority should continue to consult us on appropriate assessments addressing impacts upon European designated sites other than water scarcity.

Please take this letter as our ongoing substantive advice, to be reviewed in 12 months' time from the date of this letter or once the savings identified to be used as mitigation have run out.

Yours sincerely,

Sophie Moore

Senior Officer for Sussex, Sustainable Development