Planning Statement
Rapkyns Old Stables

Overview

This planning statement supports application DC/25/1921 for the removal of condition 4 of the previously approved application DC/25/0286, relating to water neutrality.

Planning permission DC/25/0286 was approved on 22nd August 2025 for the following development: *Change of use, conversion and internal alterations of an existing residential dwelling to provide 5 residential bedspaces for students with special educational needs. Conversion, internal alterations and change of use of the existing annex and garages to provide an additional residential unit with 3 bedspaces.*

The existing property is currently a private residential dwelling. The proposed alterations and change of use will enable the building to be utilised as residential accommodation to support existing pupils at New Barn School. A full description of the proposals, context and rationale behind the development can be found in the design and access statement that was submitted as part of the above planning application.

Since the approval of DC/25/0286, significant changes have occurred in respect of water neutrality policy. As a result, the water neutrality conditions attached to the permission are no longer necessary or justified. This statement sets out the policy context and rationale for their removal.

Changes in water neutrality policy

Water neutrality requirements were introduced in 2021 when Natural England advised that all development in the Sussex North Water Supply Zone must achieve no net increase in water use due to potential impacts on the Arun Valley protected sites. This led to planning conditions and obligations requiring water neutrality for all applications.

On 31st October 2025, Natural England issued a withdrawal statement confirming that its position statement of September 2021 had been withdrawn.

Following Natural England's withdrawal statement, Horsham District Council issued a new position statement providing clarity on the handling of planning applications moving forward, with relation to water neutrality. The statement noted,

For individual applications, we will now be using the 2024/25 water efficiency savings made by Southern Water to allow <u>all</u> development to move forward as water neutral from 1st November 2025. These savings were previously to be used by the Sussex North Water Certification Scheme (SNWCS), and amount to some 3,240,000 litres per day. SNWCS, for the avoidance of doubt, will no longer be launched.

For applicants, this means that:

1. *No water neutrality statement is now required;*
2. *No payment into SNWCS is needed to use the Southern Water capacity referred to above;*
3. *No bespoke conditions or s106 obligations are required to demonstrate water neutrality.*

Furthermore, the position statement also clarified, *"For applicants who have existing planning permissions with conditions and s106 obligations requiring compliance with bespoke water neutrality*

mitigation, we will consider applications under s.73 of the Town and Country Planning Act to remove those conditions, and any associated applications to vary or discharge any relevant s106 obligations. "

Request to remove planning conditions

This application seeks the removal of condition 4. The full wording of the condition is as follows:

Condition 4: *Pre-Commencement Condition: No development shall commence until either:*

i) Details have been submitted to and been approved in writing by the Local Planning Authority confirming that the necessary certificate to demonstrate water neutrality has been secured via the Sussex North Water Certification Scheme; or

ii) A site-specific water neutrality mitigation scheme has been submitted to and been approved in writing by the Local Planning Authority. The site-specific water neutrality mitigation scheme shall include full details of the means of any and all onsite and offsite mitigation and any necessary agreements pursuant to S106 of the Town and Country Planning Act 1990 to deliver and secure the approved mitigation; and

iii) The development shall not be first occupied until evidence has been submitted to and been approved in writing by the Local Planning Authority confirming that the approved site-specific water neutrality mitigation scheme under part ii) has been fully implemented. The approved mitigation shall thereafter be retained, maintained and operated to the same or better water performance standard.

The above condition was originally imposed to secure compliance with Natural England's 2021 water neutrality guidance and the council's corresponding policy position at the time. However, the underlying justification for this condition has now been removed, given the withdrawal of the Natural England statement.

Removal of this condition will therefore bring the planning permission into alignment with current legislation and policy. This will also enable the client to implement the permission, without the reliance on the SNWCS, which is now not due to be launched.

Overall, the above conditions are no longer required to make the development acceptable in planning terms and it is therefore requested that condition 4 of the approval is removed.