PLANNING COMMITTEE REPORT

TO:	Planning Committee
BY:	Head of Development and Building Control
DATE:	13 May 2025
DEVELOPMENT:	Change of use from Use Class F2 and ancillary flat to mixed-use comprising Use Class F1 and Use Class F2
SITE:	Drill Hall Denne Road Horsham West Sussex RH12 1JF
WARD:	Denne
APPLICATION:	DC/25/0366
APPLICANT:	**Name:** Mr Jos Wintermeyer **Address:** LifeSpring Church Jubilee House Worthing Road Southwater RH13 9JB

REASON FOR INCLUSION ON THE AGENDA: The land is owned by Horsham District Council

RECOMMENDATION: To approve planning permission subject to conditions

1. THE PURPOSE OF THIS REPORT

1.1 To consider the planning application.

DESCRIPTION OF THE APPLICATION

1.2 The application seeks full planning permission for the change of use of the Drill Hall from Use Class F2 (community use) to a mixed-use comprising Use Class F1 (Learning and Non-Residential Institutions) and Use Class F2 (Community Use).

1.3 The application seeks permission for use of the Drill Hall within Class F1(f) to enable its use for public worship by Life Spring Church. This would be in addition to the current use of the building for Class F2 (b) (Local Community) use. It is understood that Life Spring Church would operate the Drill Hall for both their church practices and for community use.

1.4 The submitted plans detail that the floor area within the Drill Hall would be split between Community Use (F2) (644sqm) and Church (F1) (212sqm), with the remaining areas as circulation space / communal spaces (toilets / hallways-333sqm). The ground and first floors would be used as follows:

Ground Floor (Plan Number 0514 P 001)

1.5 The ground floor kitchen and two office rooms along with two storerooms would be used by Life Spring Church only (as outlined in red on the proposed floor plan).

1.6 The Main Hall would continue to be available to hire to the local community Monday to Saturday (excluding Wednesday / Thursday evenings) (as hatched blue on the proposed floor plan).

1.7 The refreshment hall and 4 meeting rooms would be available to hire by the local community Monday to Saturday (as hatched yellow on the proposed floor plan).

First Floor (Plan Number 0514 P 002)

1.8 At first floor level, three office rooms and two meeting rooms would be used by Life Spring Church only (as outlined in red on the proposed first floor plan).

1.9 The two meeting rooms would be available to hire by the local community Monday to Saturday (as hatched yellow on the proposed floor plan).

1.10 The application states that the site currently operates between the following hours (although there is no relevant planning condition to this effect):

- Monday to Thursday 10:00am to 11:00pm
- Friday to Saturday: 10:00am to 00:00 (Midnight)
- Sunday and Bank Holidays: 10:00am to 10:30pm

1.11 The Applicant is proposing the following hours of operation:

- Monday to Thursday: 07:00am to 11:00pm
- Friday to Saturday: 07:00am to 00:00 (Midnight)
- Sunday and Bank Holidays: 09:00am to 11:00pm

1.12 The Applicant is also proposing the following hours for the playing amplified music:

- Monday to Thursday: 08:30am to 11:00pm
- Friday to Saturday: 08:30am to 00:00 (Midnight)
- Sunday and Bank Holidays: 09:00am to 11:00pm

DESCRIPTION OF THE SITE

1.13 The application site is a Council owned site which is located within the Built-up Area Boundary of Horsham and to the southeast of the town centre. The two-storey building, known as Drill Hall (floor area 1,189sqm), fronts Denne Road and is a former military assembly hall now used for Council-run events and as a community space. The building comprises a community hall with a vaulted ceiling with rooflights, which is itself flanked by adjoining meeting / office rooms to the northern, southern, and eastern parts of the ground and first floor building. The main access (stepped) to the building is from the Denne Road.

1.14 To the rear (east) of the Drill Hall is the Council owned Dukes Square carpark accessed via an in / out single vehicular lane to the south of Drill Hall. There is a separate pedestrian access route between the Dukes Square car park and Denne Road to the north side of the building.

1.15 The planning history for the site does not reveal any restrictions on the hours of operation permitted at the Drill Hall. There is, however, a flat at first floor level which is accessed from within the building (via a storage room). Whilst there is no planning history to confirm the flat benefits from planning permission, council tax records show the flat having been registered since 2004 with council records also showing a signed tenancy agreement with council for a Drill Hall Supervisor to occupy the flat as an employee of the Council. The Council's Director of Communities has confirmed the flat remains occupied by the same supervisor ancillary to the main community use of the building.

1.16 The application site is located within the Horsham Conservation Area; and is identified as falling within an Archaeological Notification Area (Horsham Town Centre Medieval Core). Although not formerly listed, the Drill Hall building has recently been added to the Horsham Town Local List due to its historic and architectural interest. The site is also located within a Heat Priority Area; and within the Zone 4 impact risk zone for Great Crested Newts.

1.17 The Drill Hall is identified as an Asset of Community Value and was included as such on the Assets of Community Value list maintained by the Council under section 87(1) of the Localism Act 2011(c) on the 26th June 2023.

1.18 Immediately to the north-east of Drill Hall is a single storey building which accommodates a miniature rifle range club. The area immediately west of Denne Road and opposite Drill Hall is largely residential in character. To the rear of Drill Hall, the Dukes Square car park provides an area of separation between Drill Hall and dwellings in Denne Parade (to the north) and the flatted developments at Lavinia House, Mill River Lodge and Observer Court to the east of the hall. The railway line to the rear of the flatted development separates the residential area beyond and to the rear of Queensway. St Mary's Church is located approximately 163m to the west of Drill Hall, and St Peters Church 156m to the north of Drill Hall.

2. INTRODUCTION

STATUTORY BACKGROUND

2.1 The Town and Country Planning Act 1990.

RELEVANT PLANNING POLICIES

2.2 The following Policies are considered to be relevant to the assessment of this application:

2.3 **National Planning Policy Framework:**

2.4 **Horsham District Planning Framework (HDPF 2015):**
Policy 1 - Strategic Policy: Sustainable Development
Policy 2 - Strategic Policy: Strategic Development
Policy 3 - Strategic Policy: Development Hierarchy
Policy 7 - Strategic Policy: Economic Growth
Policy 9 - Employment Development
Policy 11 - Tourism and Cultural Facilities
Policy 24 - Strategic Policy: Environmental Protection
Policy 25 - Strategic Policy: The Natural Environment and Landscape Character
Policy 31 - Green Infrastructure and Biodiversity
Policy 32 - Strategic Policy: The Quality of New Development
Policy 34 - Cultural & Heritage Assets
Policy 33 - Development Principles
Policy 37 - Sustainable Construction
Policy 38 - Strategic Policy: Flooding
Policy 40 - Sustainable Transport
Policy 41 - Parking
Policy 42 - Inclusive Communities
Policy 43 - Community Facilities, Leisure, and Recreation

2.5 **Horsham Blueprint Business Neighbourhood Plan (2022):**
Policy HB1 (Location of Development)
Policy HB6 (Retaining and Enhancing the Vitality and Viability of Horsham Town Centre)
Policy HB12 (Encouraging Sustainable Movement)

Policy HB14 (Community and Cultural Facilities)

2.6 **Horsham District Local Plan (2023-40) (Regulation 19):**
Policy 1: Sustainable Development
Policy 2: Development Hierarchy
Policy 4: Horsham Town
Policy 6: Climate Change
Policy 7: Appropriate Energy Use
Policy 8: Sustainable Design and Construction
Policy 9: Water Neutrality
Policy 10: Flooding
Policy 13: The Natural Environment and Landscape Character
Policy 17: Green Infrastructure and Biodiversity
Policy 19: Development Quality
Policy 20: Development Principles
Policy 21 Heritage Assets and Historic Environment
Policy 23: Infrastructure Provision
Policy 24: Sustainable Transport
Policy 25: Parking
Policy 27: Inclusive Communities, Health, and Wellbeing
Policy 28: Community Facilities; Leisure and Recreation
Policy 29: New Employment
Policy 30: Enhancing Existing Employment

2.7 **Supplementary Planning Guidance:**
Planning Obligations and Affordable Housing SPD (2017)
Community Infrastructure Levy (CIL) Charging Schedule (2017)

2.8 **Planning Advice Notes:**
Facilitating Appropriate Development
Biodiversity and Green Infrastructure

PLANNING HISTORY AND RELEVANT APPLICATIONS

DC/24/1465	Change of use from Use Class F2 to a mixed-use comprising Use Class F1 and Use Class F2 together with amended hours of operation.	Withdrawn Application on 04.12.2024

3. OUTCOME OF CONSULTATIONS

3.1 Where consultation responses have been summarised, it should be noted that Officers have had consideration of the full comments received, which are available to view on the public file at www.horsham.gov.uk.

INTERNAL CONSULTATIONS

3.2 **HDC Conservation:** No Objection: -

3.3 The Drill Hall is situated within the Horsham Town Conservation Area and is a distinctive building in the streetscene. The building has been identified by the Horsham Society in a recent review as an addition to the Horsham Town Local List due to its historic and architectural interest. It would be considered that the proposed change of use and amended hours of operation would retain its character and would not result in harm to the wider conservation area

3.4 **HDC Economic Development:** No Objection.

3.5 **HDC Environmental Health (Initial Response):** Cannot support this application as there is a religious celebration at the property with a now proposed residential premises. There will be a strong likelihood of statutory noise nuisance. There is no allowance for exemption that the occupants of the residential property may be members of the religious group.

3.6 **HDC Environmental Health (Subsequent Response)**: No Objection

OUTSIDE AGENCIES

3.7 **WSCC Highways**: Comment: -

The site is located on Denne Road, an unclassified road subject to a speed restriction of 30mph. Whilst the extended operating times will likely see an increase in movements during these times, the Local Highways Authority (LHA) does not anticipate that this would have a significant impact on the operation of the local highway network. Access and parking will remain as per the existing arrangements, with parking being accommodated either on-street or within nearby paid-for provision. There is no evidence to suggest this existing arrangement has been operating unsafely, nor that the proposals would exacerbate an existing safety concern.

The LHA does not consider that this proposal would have an unacceptable impact on highway safety or result in 'severe' cumulative impacts on the operation of the highway network, therefore is not contrary to the National Planning Policy Framework (paragraph 116), and that there are no transport grounds to resist the proposal.

PUBLIC CONSULTATIONS

Representations:

3.9 No representations received.

3.10 Neighbourhood Comments:

Horsham Denne Neighbourhood Council: No Objection

3.11 Member Comments:

None received

4. HOW THE PROPOSED COURSE OF ACTION WILL PROMOTE HUMAN RIGHTS

4.1 The application has been considered having regard to Article 1 of the First Protocol of the Human Rights Act 1998, which sets out a person's rights to the peaceful enjoyment of property and Article 8 of the same Act, which sets out their rights in respect to private and family life and for the home. Officers consider that the proposal would not be contrary to the provisions of the above Articles.

4.2 The application has also been considered in accordance with Horsham District Council's public sector equality duty, which seeks to prevent unlawful discrimination, to promote equality of opportunity and to foster good relations between people in a diverse community, in accordance with Section 149 of the Equality Act 2010. In this case, the proposal is not anticipated to have any potential impact from an equality perspective.

5. HOW THE PROPOSAL WILL HELP TO REDUCE CRIME AND DISORDER

5.1 It is not considered that the development would be likely to have any significant impact on crime and disorder.

6. PLANNING ASSESSMENTS

6.1 The application seeks full planning permission for the change of use of the Drill Hall from Use Class F2 (community use) to a mixed-use comprising Use Class F1 (Learning and Non-Residential Institutions) and Use Class F2 (Community Use).

Background:

6.2 The Drill Hall is a Council owned site. The applicant is Life Spring Church, who would, in part, be the future occupants of the Drill Hall alongside other community hall / use occupants.

6.3 Should planning permission be granted as a result of this application, then instead of the use of the building falling within Use Class F2 as a community hall, it would comprise a mixed-use premises under:

- Use Class F1(f) (in connection with a use for public worship or religious instructions); and
- Use Class F2(b) (for purposes of a hall or meeting place for the principal use of the local community

6.4 The proposed Use Classes, F1 and F2(b), essentially replicate the former Use Class D1, thereby retaining the overall use of the building.

Principle of Development:

6.5 Policy 43 of the Horsham District Planning Framework (HDPF) states that the provision of new or improved community facilities or services will be supported, particularly where they meet the identified needs of local communities as indicated in the current Sport, Open Space and Recreation Study and other relevant studies, or contribute to the provision of Green Infrastructure.

6.6 Policy 42 of the HDPF states that positive measures which help create a socially inclusive and adaptable environment for a range of occupiers and users to meet their long-term needs will be encouraged and supported. Particular account will be taken of the need to address the requirements stemming from, among other groups, the needs of an ageing population; people with additional needs; the co-ordination of services to fulfil the needs of young people; and the specific needs of faith and other community groups.

6.7 Policy HB14 of the Horsham Blueprint Business Neighbourhood Plan states that proposals for new / improved community facilities will be encouraged subject to the following criteria: the proposal would not have significant harmful impacts on the amenities of surrounding residents and the local environment; and the proposal would not have significant adverse impacts upon the local road network; and sufficient associated storage space and adequate parking space is provided. Proposals that enable the diversification and flexible use of the buildings through the extension of and shared use of such buildings to provide additional community facilities will be supported.

6.8 Paragraph 96 of the NPPF states that planning decisions should aim to achieve healthy, inclusive and safe places which: promote social interaction, for example through mixed-use developments; are safe and accessible so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion; and enable and support healthy lives through both promoting good health and preventing ill-health, especially where this

would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities.

6.9 Paragraph 98 of the NPPF outlines that to provide the social, recreational and cultural facilities and services the community needs, planning decisions should: plan positively for the provision and use of shared spaces, community facilities, and other local services to enhance the sustainability of communities and residential developments; take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community; guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs; and ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.

6.10 The application site is located within the built-up area of Horsham, which is defined as the Main Town under the settlement hierarchy contained in Policy 3 of the HDPF. This is defined as a settlement with a large range of employment, services and facilities and leisure opportunities, including those providing a distinct function. Strong social networks with good rail and bus accessibility. The settlement meets the majority of its own needs and many of those in smaller settlements.

6.11 The provision of a place of worship alongside the established community use and office space, as is proposed, is considered to accord with Policies 42 and 43 of the HDPF, which seek to support measures which help create a socially inclusive and adaptive environment, including the provision of new community facilities within the District.

6.12 The proposal would maintain the existing use of the building for community use, in accordance with Policies 42 and 43 of the HDPF, Policy HB14 of the Horsham Blueprint Business Neighbourhood Plan, and the relevant policies of the NPPF.

Design and Appearance:

6.13 Policies 25, 32, and 33 of the HDPF promote development that protects, conserves and enhances the landscape and townscape character from inappropriate development. Proposals should take into account townscape characteristics, with development seeking to provide an attractive, functional and accessible environment that complements the locally distinctive character of the district. Buildings should contribute to a sense of place, and should be of a scale, massing, and appearance that is of a high standard or design and layout which relates sympathetically to the landscape and built surroundings.

6.14 Policy 34 of the HDPF recognises that heritage assets are an irreplaceable resource, and as such the Council will sustain and enhance its historic environment through positive management of development affecting heritage assets. Applications for such development will be required to reinforce the special character of the district's historic environment through appropriate siting, scale, form, and design; make a positive contribution to the character and distinctiveness of the area, ensuring that development in Conservation Aras is consistent with the special character of the area.

6.15 Policy HB3 of the Horsham Blueprint Business Neighbourhood Plan states that development is expected to preserve and enhance the Character Area in which it is located. The design of new development should take account of the local context and reflect the character and vernacular of the area, using architectural variety in form and materials, in order to avoid building design that is inappropriate to the Plan area. Policy HB4 continues that development is expected to demonstrate a high quality of design which responds and integrates well with its surroundings, meeting the changing needs of residents and minimises the impact on the natural environment.

6.16 There are no internal or external alterations proposed to facilitate the change of use. Following consultation with the Council's Design and Conservation Officer, it is considered that the proposed change of use would retain the character of the building and would not result in harm to the wider Conservation Area. On this basis, no objection is raised.

6.17 The external appearance of the building would therefore remain as existing, and the proposal would not conflict with Policies 32, 33, and 34 of the HDPF nor Policy HB3 and HB4 of the Horsham Blueprint Business Neighbourhood Plan.

Residential Amenity:

6.18 Policy 32 of the HDPF states that development will be expected to provide an attractive, functional, accessible, safe, and adaptable environment that contributes a sense of place both in the buildings and spaces themselves. Policy 33 of the HDPF continues that development shall be required to ensure that it is designed to avoid unacceptable harm to the amenity of occupiers/users of nearby property and land.

6.19 Policy HB14 of the Horsham Blueprint Business Neighbourhood Plan states that proposals for new/improved community facilities will be encouraged provided the proposal would not have a significant harmful impact on the amenities of surrounding residents and the local environment.

6.20 Paragraph 198 of the NPPF states that planning decisions should ensure that new development is appropriate for its location, taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so, they should mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development, and avoid noise giving rise to significant adverse impacts on health and the quality of life. Paragraph 201 continues that the focus of planning decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions.

6.21 The details submitted in support of the application outline that the operating hours of the site would be between: -

- Monday to Thursday: 7am to 11pm
- Friday and Saturday: 7am to midnight
- Sunday and Bank Holidays: 9am to 11pm

6.22 The details submitted in support of the application outline that the amplified music hours of operation would be between: -

- Monday to Thursday: 8.30am start (no end time given)
- Friday and Saturday: 8.30am start (no end time given)
- Sunday and Bank Holiday: 9am start and finish at 11pm

6.23 The Assessment sets out that internal and external sound meters were installed on the site between the 10th October and 17th October 2024 to measure the ambient sound levels and background noise levels associated with the use of Drill Hall. The Assessment states that the monitoring period was able to 'capture a typical Sunday church service by use of the internal meter'. This service occurred on 13th October 2024 and included music from 'a full band with drums, bass guitar, electric guitar, keyboard and two vocals'.

6.24 The Applicant has submitted a Noise Impact Assessment reference J3924 by Acoustics South East dated 21.10.2024. This Assessment includes references to the ISO9613 (Attenuation of sound during propagation outdoors) 1996; National Planning Policy

Framework (NPPF) 2023; Planning Noise Advice Document Sussex 2023; and the BS8233 Guidance on sound insulation and noise reduction for buildings 2014.

6.25 The methodology included 'a noise breakout assessment of the venue' (with all doors closed) to assess the effectiveness of each of the four facades of the venue, this allowed a noise contour map to be produced to demonstrate how sound from the hall spreads across the surrounding area. From these results (as the associated noise contour map) the Assessment concludes that '*even during the loudest 5-minute period of the church service (the worst-case scenario) the technical data assimilated from the noise assessment demonstrated that the sound pressure level at the point of the nearest noise receptors was 'significantly below background sound levels for readings taken between 11:30pm and 00:30am*'. The assessment therefore concludes, based on these results, that '*no additional mitigation measures are required'*.

6.26 There are no reasons to dispute the methodology or findings of the submitted Noise Impact Assessment, which confirms that the sound level meters installed were calibrated before and after the survey in situ to ensure that the information and data being obtained was representative and that the sound level meter was operating correctly.

6.27 The use of the site as a place of worship would attract visitors and worshippers and would result in a degree of activity at the site, including trips to and from the premises by foot and vehicles during specific periods of the day and throughout the week. It is though recognised that the site is already in use as a community facility and already attracts visitors on a daily basis, this activity similarly already includes the Church which currently hires the hall within the building.

6.28 It is considered, taking into account the existing lawful use of the site as a community facility and the findings of the Noise Impact Assessment, that the proposal would not result in any appreciable or significant increase in the level of activity or number of people visiting the site for the purposes of worship over and above the existing levels. While not all visitors to the community centre would necessarily visit the site as a place of worship, it is equally asserted that not all worshippers would visit the site as a community centre for other purposes. As such, there is a balance to be considered in respect of the levels of activity associated with each use.

6.29 It is noted that concerns were initially raised by Environmental Health relating to the impact of the proposed on an existing residential property within the building. This existing residential unit would though be omitted as part of the proposal, and would be replaced with additional office accommodation to the first floor. There would be no conflict between these proposed uses and no unacceptable harm to amenity would arise. Subject to this clarification, Environmental Health have raised no objection to the proposal.

6.30 The site has been operating in an unrestricted manner for a number of years, with both evenings events and events playing amplified music without complaints being raised by nearby residents. There is no evidence to suggest that future potential events extending to the hours as proposed would result in amenity harm as a consequence of noise from the building or from users of the site.

6.31 It is therefore considered that the proposed hours of opening and amplified music would be acceptable given the context of the site and the established operation of the building. While some intermittent noise may result from access and egress to the building, such activity is currently permitted under the existing community use, and it is not considered that the proposed use would intensify this activity beyond that allowed under the current use of the building.

6.32 For these reasons, subject to appropriate conditions to control operating hours and hours of amplified music, the proposal would not result in any significant or appreciable harm to the

amenities of nearby residential occupiers, in accordance with Policy 33 of the Horsham District Planning Framework (2015).

Highways Impacts:

6.33 Policies 40 and 41 of the HDPF promote development that provides safe and adequate access, suitable for all users.

6.34 The Planning Statement outlines that the Drill Hall currently operates with no formalised drop off and collection points, with timings and works on an ad hoc basis when community activities necessitate. There are no parking controls or restrictions along Denne Road.

6.35 West Sussex County Council as the Local Highways Authority (LHA) have been consulted and have advised that while the operating times would likely result in an increase in traffic movements given the longer operating hours proposed, the use of Drill Hall for such purposes would not be so significant as to impact the operation of the local highway network.

6.36 The LHA note that there are no changes to the existing access or parking arrangements, where these are generally either on street or within the Council's existing car parking facilities which are close by (and include Denne Road car park). The LHA advise that the proposed use of Drill Hall for mixed use community/place of worship would not result in unacceptable impacts on highway safety that would raise concerns or result in severe cumulative impacts on the operation of the highway network. As such, there are no transport grounds to resist the proposal.

6.37 For these reasons, the proposal is considered to be acceptable, in accordance with Policy 40 and 41 of the Horsham District Planning Framework (2015).

Water Neutrality:

6.38 Horsham District is situated in an area of serious water stress, as identified by the Environment Agency. In September 2021, Natural England released a Position Statement which advised all local authorities within the Sussex North Water Supply Zone that it cannot be concluded that existing water abstraction within the Sussex North Water Supply Zone is not having an adverse effect on the integrity of the Arun Valley SAC/SPA/Ramsar sites near Pulborough. The Position Statement advises the affected local authorities that developments within the Sussex North Supply Zone must not therefore add to this impact, and to achieve this, all proposals must demonstrate water neutrality. The definition of water neutrality is the use of water in the supply area before the development is the same or lower after the development is in place.

6.39 In assessing the impact of development on protected habitat sites such as those in the Arun Valley, decision makers must, as the competent authority for determining impact on such sites, ensure full compliance with the Conservation of Habitats and Species Regulations 2017 (known as the Habitat Regulations). The Regulations require that a Habitats Regulations Assessment (HRA) be carried out to determine if a plan or project may affect the protected features of a habitats site, before the grant of any planning permission. Section 70(3) of the Regulations requires that planning permission must not be granted unless the competent authority (Horsham District Council) is satisfied that the proposed development will not adversely affect the integrity of the affected habits site. Section 63 of the Regulations sets out the process by which an HRA must take place.

6.40 The requirements of Section 70(3) are reflected in paragraph 193 of the NPPF, which states that 'if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused'. The application site falls within the Sussex North Water Supply Zone which draws its water supply

from groundwater abstraction at Hardham (near Pulborough), adjacent to the Arun Valley sites. The water abstraction issues raised by the Natural England Position Statement are therefore material planning considerations relevant to the proposal. Given the requirements of the Habitat Regulations and paragraph 193 of the NPPF, adverse impact on the integrity of the Arun Valley sites must be given great weight in decision making. In order to demonstrate that no adverse impact will occur at the Arun Valley sites, all new development within the supply zone must demonstrate water neutrality, i.e., that water consumption from the site when occupied will not increase water abstraction in the Arun Valley.

6.41 The submitted Water Neutrality Statement, as detailed within the Planning Statement, outlines that there would be no increase in the size of the building, and it is not anticipated that the proposed change of use to mixed use would materially intensify the occupation of the building or increase water consumption. The application is therefore considered to be water neutral with no mitigation required.

6.42 Consequently, there is no clear or compelling evidence to suggest the nature and scale of the proposed development would result in a more intensive use of the site necessitating an increased consumption of water that would result in a significant impact on the Arun Valley SAC, SPA and Ramsar sites, either alone or in combination with other plans and projects. The grant of planning permission would not therefore adversely affect the integrity of these sites or otherwise conflict with Policy 31 of the HDPF, NPPF paragraph 193 and the Council's obligations under the Conservation of Habitats and Species Regulations 2017.

Other Matters:

Loss of Residential Accommodation

6.43 There is currently a caretaker flat at first floor level. This accommodation is not self-contained and is instead accessed through the remainder of the building (with no evidence to suggest the side fire escape formed a primary access). It is considered that this flat has operated for at least 20 years in an ancillary manner to the main community use of Drill Hall.

6.44 The proposed plans indicate that this flat would be converted to meeting rooms / offices to be used as part of the overall use of the building. As the residential unit is not self-contained and has been used in connection with the primary use of the building it is considered its loss would not materially impact on the supply of housing within the District and would not amount to any reason to refuse the application.

Asset of Community Value

6.45 It is noted that the Drill Hall is included within the Assets of Community Value list held by the Council. An Asset of Community Value is defined *'as being a building or other land is an asset of community value if its main use has recently been or is presently used to further the social wellbeing or social interests of the local community and could do so in the future'*.

6.46 The Localism Act states that 'social interests' include cultural, recreational, and sporting interests. The Drill Hall remains on the Council's List for Assets for at least five years from when it was added (26 June 2023). The proposed change of use to a mixed use comprising the existing community facility uses and the proposed place of worship, are both uses that are defined as meeting the needs of faith and other community groups. As such, it is considered that there would be no policy conflict in allowing the proposed mixed use of Drill Hall given that the building would remain in community use in its entirety. The proposal would not compromise the building being listed as an Asset of Community Value.

Biodiversity Net Gain (BNG):

6.47 Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) mandates that every development must achieve at least a 10% Biodiversity Net Gain (BNG), unless the development qualifies as exempt under the Biodiversity Gain Requirements (Exemptions) Regulations 2024.

6.48 The Applicant has demonstrated that the development is exempt from the requirement to achieve a minimum 10% BNG by reason of:

- The development qualifies as 'de minimis' under Regulation 4 of the Biodiversity Gain Requirements (Exemptions) Regulations 2024

Conclusions and Planning Balance:

6.49 The proposed change of use of the Drill Hall from Use Class F2 to a mixed-use Class F1/F2 use would retain community use of the building and would not result in any adverse impacts on private amenity of nearby residential occupiers by way of noise, or traffic generation, or in terms of the intensity of use of the building or impacts on its surrounds. There are no internal or external alterations proposed to facilitate the mixed use of the building. The proposal is therefore considered to comply with Policies 32, 33, 34, 40, 41, 42 and 43 of the Horsham District Planning Framework (2015) and Policy HB14 of the HDNP.

7. RECOMMENDATIONS

7.1 To approve full planning permission subject to the following conditions:

1 **Approved Plans**

2 **Regulatory (Time) Condition**: The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason: To comply with Section 91 of the Town and Country Planning Act 1990.

3 **Regulatory Condition**: Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 and the Town and Country Planning (Use Classes) Order 1987 (as amended) (or any order amending or revoking and/or re-enacting these Orders), the premises shall be used in accordance with the approved details, as a mixed Use Class F1(f) and Class F2(b) use only, and for no other purpose, including any other purpose set out in Class F1 and Class F2 of The Town and Country Planning (Use Classes) Ordeer (or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification) without express planning consent from the Local Planning Authority first being obtained.

Reason: The Local Planning Authority would wish to retain control over any subsequent change of use of these premises in the interests of safeguarding the amenities of the area and to comply with policy 33 of the Horsham District Planning Framework (2015).

4 **Regulatory Condition**: The premises shall not be open for trade or business except between the hours of 07:00am to 11:00pm Monday to Thursday; 07:00am to 00:00

(Midnight) Friday and Saturday; and 09:00am to 11:00pm Sunday and Bank Holidays.

Reason: To safeguard the amenities of neighbouring properties in accordance with Policy 33 of the Horsham District Planning Framework (2015).

5 **Regulatory Condition**: No amplified music shall be played at the premises outside the hours of 08:30am to 11:00pm Monday to Thursday; 08:30am to 00:00 (Midnight) Friday and Saturday; and 09:00am to 11:00pm Sunday and Bank Holidays.

Reason: To safeguard the amenities of neighbouring properties in accordance with Policy 33 of the Horsham District Planning Framework (2015).

6 **Regulatory Condition**: The areas delineated in yellow and hatched blue as detailed on drawing nos. 0514 P 001 and 0514 P 002 Rev B shall be made available for community use and hire.

Reason: To safeguard the use of the Drill Hall as a community facility in accordance with Policies 42 and 43 of the Horsham District Planning Framework (2015).

Background Papers: DC/25/0366