Horsham District Council

DELEGATED APPLICATIONS - ASSESSMENT SHEET

APPLICATION NO./ADDRESS:

DC/25/1920
Broadview, Guildford Road, Broadbridge Heath, West Sussex, RH12 3PQ

DESCRIPTION:

Removal of Condition 3 and 4 of previously approved application DC/25/0289 (Change of use of building to provide 6 bedspaces for students with special educational needs to include refurbishment and internal alterations (Full)). Relating to rainwater harvesting and water neutrality.

RELEVANT PLANNING HISTORY:

DC/21/0234	Replacement of solid oak glazed entrance screen to southern elevation of building (Full Planning Application).	Application Permitted on 17.05.2021
DC/21/0235	Replacement of solid oak glazed entrance screen to southern elevation of building (Listed Building Consent).	Application Permitted on 17.05.2021
DC/24/0017	Change of use of existing dwelling to provide 6 bedspaces for students with special educational needs with associated alterations (Full Planning)	Application Refused on 22.03.2024
DC/24/0018	Change of use of the existing building to provide 6 bedspaces for students with special educational needs with associated alterations (Listed Building Consent)	Application Permitted on 22.03.2024
DC/24/1037	Refurbishment, internal alteration and change of use of the existing building to provide 6No. bedspaces for students with special educational needs (Full Application).	Withdrawn Application on 19.09.2024
DC/24/1038	Refurbishment, internal alteration and change of use of the existing building to provide 6No. bedspaces for students with special educational needs (Listed Building Consent).	Application Permitted on 16.09.2024
DC/25/0289	Change of use of building to provide 6 bedspaces for students with special educational needs to include refurbishment and Internal alterations. (Full)	Application Permitted on 02.05.2025
DC/25/0290	Change of use of building to provide 6 bedspaces for students with special educational needs to include refurbishment and Internal alterations. (Listed Building Consent)	Application Permitted on 05.06.2025

DESCRIPTION OF THE SITE

There are a number of buildings within the application site and the site is accessed via the Rapkyns Care Centre from Guildford Road. Nearby residential properties serving New B Barn School including The Clockhouse and Farmhouse.

Broadview itself is accessed from a private drive south of Guildford Road. Broadview itself is a large Grade II residential property with a number of ancillary outbuildings. The site itself is within a countryside location outside of the built up area boundary.

DESCRIPTION OF THE APPLICATION

The application seeks the removal of conditions 3 and 4 of DC/25/0290 which are conditions pertaining to Water Neutrality requirements.

The original application sought permission to provide accommodation for the existing pupils at New Barn School. The staff on site would not be living at Broadview but would work in a rota style shift pattern and requires accommodation during their night shifts. The application involved no external alterations to the building.

RELEVANT PLANNING POLICIES

The National Planning Policy Framework (NPPF)

Horsham District Planning Framework (2015):
Policy 1 - Strategic Policy: Sustainable Development
Policy 2 - Strategic Policy: Strategic Development
Policy 3 - Strategic Policy: Development Hierarchy
Policy 4 - Strategic Policy: Settlement Expansion
Policy 7 - Strategic Policy: Economic Growth
Policy 9 - Employment Development
Policy 10 - Rural Economic Development
Policy 15 - Strategic Policy: Housing Provision
Policy 16 - Strategic Policy: Meeting Local Housing Needs
Policy 18 - Retirement Housing and Specialist Care
Policy 24 - Strategic Policy: Environmental Protection
Policy 25 - Strategic Policy: The Natural Environment and Landscape Character
Policy 26 - Strategic Policy: Countryside Protection
Policy 27 - Settlement Coalescence
Policy 31 - Green Infrastructure and Biodiversity
Policy 32 - Strategic Policy: The Quality of New Development
Policy 33 - Development Principles
Policy 34 - Cultural and Heritage Assets
Policy 40 - Sustainable Transport
Policy 41 - Parking
Policy 42 - Strategic Policy: Inclusive Communities

Slinfold Neighbourhood Neighbourhood Plan:
Policy 5: Development Principles

Paragraph 33 of the NPPF requires that all development plans complete their reviews no later than 5 years from their adoption. Horsham District Council is currently in the process of reviewing its development plan however at this stage the emerging policies carry only limited weight in decision making. As the HDPF is now over 5 years old, the most important policies for the determination of this application must be considered as to whether they are 'out of date' (NPPF paragraph 11d). This includes, for applications involving the provision of housing, whether the Council can demonstrate a five year supply of deliverable housing sites (NPPF footnote 8).

The Council is currently unable to demonstrate a five year supply of deliverable housing sites, with the supply currently calculated as being 1 year. The presumption in favour of development within Paragraph 11d) of the NPPF therefore applies in the consideration of all applications for housing development within the District (unless footnote 7 or Paragraph 14 applies to relevant applications), with Policies 2, 4, 15 and 26 now carrying only moderate weight in decision making.

All other policies within the HDPF as itemised above have been assessed against the NPPF and are considered to be consistent such that they continue to attract significant weight in decision making.

Horsham District Local Plan (2023-40) (Regulation 19):
Strategic Policy 1: Sustainable Development
Strategic Policy 2: Development Hierarchy
Strategic Policy 13: The Natural Environment and Landscape Character
Strategic Policy 14: Countryside Protection
Strategic Policy 16: protected Landscapes
Strategic Policy 17: Green Infrastructure and Biodiversity
Strategic Policy 19: Development Quality
Strategic Policy 20: Development Principles
Strategic Policy 24: Sustainable Transport
Policy 25: Parking
Policy 32: Conversion of Agricultural and Rural Buildings to Commercial, Community and Residential Uses
Policy 42: Retirement Housing and Specialist Care
Policy 45: Replacement Dwellings and House Extensions in the Countryside
Policy 46: Ancillary Accommodation

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

Planning Advice Notes:
Facilitating Appropriate Development
Biodiversity and Green Infrastructure

REPRESENTATIONS AND CONSULTATIONS RESPONSES

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

Consultations:

Natural England: Standing advice

PUBLIC CONSULTATIONS:

Representations:

No comments received.

Parish Comments:

Parish Council: No comment received

Member Comments:

None received

HUMAN RIGHTS AND EQUALITY:

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.

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.

PLANNING ASSESSMENT

Planning permission was previously granted for a change of use of a dwelling to 6 bedspaces for students with special educational needs. This application was approved with the two following conditions, with condition 3 stating:-

*"**Pre-Occupation Condition**: No part of the development hereby approved shall be occupied (or brought into first use) until full details of the water efficiency measures and rainwater harvesting system required by the approved Water Neutrality Statement (received 25.02.2025) have been submitted to and approved in writing by the Local Planning Authority.*

Reason: To ensure the development is water neutral to avoid an adverse impact on the Arun Valley SACSPA and Ramsar sites in accordance with Policy 31 of the Horsham District Planning Framework (2015), Paragraphs 193 and 194 of the National Planning Policy Framework (2023), and to allow the Local Planning Authority to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), and s40 of the NERC Act 2006 (Priority Habitats & Species)."

Condition 4 of DC/25/0290 stated:-

*"**Pre-Occupation Condition**: The development hereby permitted shall be undertaken in full accordance with the Water Neutrality Statement (received 25.02.2025). No part of the development hereby approved shall be occupied (or brought into first use) until evidence has been submitted to and been approved in writing by the Local Planning Authority that the approved water neutrality strategy for the development has been implemented in full. The evidence shall include the specification of fittings and appliances used, evidence of their installation, and completion of the as built Part G water calculator or equivalent. The installed measures shall be retained as such thereafter.*

Reason: To ensure the development is water neutral to avoid an adverse impact on the Arun Valley SAC/SPA and Ramsar sites in accordance with Policy 31 of the Horsham District Planning Framework (2015), Paragraph 193 of the National Planning Policy Framework (2024), and to enable the Local Planning Authority to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), and s40 of the NERC Act 2006 (Priority Habitats & Species)."

A 2021 Position Statement from Natural England identified that it could not be concluded with the required degree of certainty that new development in the Sussex North Water Supply Zone would not have an adverse effect on the integrity of the Arun Valley SAC, SPA and Ramsar sites. As a consequence, and to comply with the legal duties set out in the Conservation of Habitats and Species Regulations 2017 (known as the Habitat Regulations), all new development since has been required to demonstrate water neutrality. The above conditions were imposed to ensure water neutrality. This current application seeks to remove this condition.

On 31st October 2025 Natural England formally withdrew the 2021 Position Statement, citing a package of measures that they were satisfied would safeguard the Arun Valley sites. Principal amongst these measures is a reduction in the Southern Water abstraction licence 'by March 2026'. However, given the licence change has not yet taken place Horsham District Council, as competent authority under the Habitats Regulations, cannot yet be certain that new development will not result in adverse impacts on the Arun Valley sites.

To ensure development can come forward as water neutral in the meantime, the Council has agreed with Natural England to use the significant water savings made by Southern Water in 2024/25 through their programme of leakage reduction (amongst other measures). This has generated some 3,240,000 litres per day of water savings that can now be attributed to new development without increasing water abstraction in the Arun Valley beyond baseline. These savings were previously to be used to launch the Sussex North Water Certification Scheme (SNWCS), however following the withdrawal statement SNWCS will no longer be launching. Natural England standing advice dated 10 November 2025 raises

no objection to using these savings to enable development to come forward. The standing advice clarifies that it functions 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 above Southern Water savings.

Officers have undertaken an Appropriate Assessment which demonstrates that the anticipated increase in mains water consumption from this development, alongside all other development granted since the 31st October 2025, will not exceed 3,240,000 litres per day.

Accordingly, Officers consider that the proposed development will not have an Adverse Effect on the Integrity of the Arun Valley Site, either alone or in combination with other plan and projects, thereby complying with Regulations 63 and 70 of the Conservation of Habitats and Species Regulations 2017, HDPF Policy 31, and paragraph 193 of the NPPF.

Conclusions:

The application seeks to remove conditions in which the applicant was required to demonstrate water neutrality. Since the relevant application was considered, the Natural England position statement has been withdrawn, and the conditions are no longer required. It is appropriate and acceptable in this instance therefore for the conditions to be removed.

Recommendation: Application Permitted

Conditions:

2 **Standard Time Condition**: The development hereby permitted must be commenced by the 05.06.2028.

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

3 **NOT USED**

4 **NOT USED**

POSITIVE AND PROACTIVE STATEMENT

Statement pursuant to Article 35 of the Town and Country Planning (Development Management Procedure) (England) Order 2015. The Local Planning Authority has acted positively and proactively in determining this application by assessing the proposal against all material considerations, including planning policies and any representations that may have been received, in order to be able to, where possible, grant permission.

Plans list for: DC/25/1920
(The approved plans will form Condition 1 on the Decision Notice of all Permitted applications)

Schedule of plans/documents **approved**:

Plan Type	Description	Drawing Number	Received Date
Location plan	Existing Location Plan	2119_001	25.02.2025
Block plan	Existing Block Plan	2119_003	25.02.2025
Floor plan	Existing Ground Floor Plan	2119_005	25.02.2025
Floor plan	Existing First Floor Plan	2119_006	25.02.2025
Elevation plan	Existing Elevations	2119_008	25.02.2025

Elevation plan	Existing Elevations	2119_009	25.02.2025
Floor plan	Proposed Ground Floor Plan	2119_010	25.02.2025
Floor plan	Proposed First Floor Plan	2119_011	25.02.2025
Elevation plan	Proposed Elevations	2119_013	25.02.2026
Elevation plan	Proposed Elevations	2119_014	25.02.2025

DELEGATED

Case Officer sign/initial Hannah Darley Date: 27TH January 2026

Authorising Officer sign/initial Tamara Dale Date: 27.01.2026