Horsham District Council

# DELEGATED APPLICATIONS - ASSESSMENT SHEET

APPLICATION NO./ADDRESS:
HRA/25/0013
Barn To The East of Coolham Road, Coolham, West Sussex, RH13 8QD

DESCRIPTION:
Application under Regulation 77 of the Conservation of Habitats and Species Regulations 2017 relating to Prior Approval consent DC/25/0113

RELEVANT PLANNING HISTORY:

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|---|---|---|
| DC/25/0113 | Prior Notification for Change of Use of Agricultural Building to 2no. dwellinghouses. | Prior Approval Required and PERMITTED on 20.03.2025 |

STATUTORY BACKGROUND
**The Conservation of Habitats and Species Regulations 2017**
**The Town and Country Planning Act 1990**

CONSULTATION
**Natural England:** Standing Advice issued.

PLANNING ASSESSMENT
Prior Approval (DC/25/0113) was granted on 20.03.2025 for the following:

*"Prior Notification for Change of Use of Agricultural Building to 2no. dwellinghouses"*

An informative was attached to the consent that advised the applicant that the decision relates solely to whether the Prior Approval of the Local Planning Authority was required. It did not confirm that the proposal represented Permitted Development. The site lies within the Sussex North Water Supply Zone where Natural England has advised that water abstraction cannot be concluded as having no adverse effect on the integrity of the Arun Valley Special Area Conservation (SAC), the Arun Valley Special protection Area (SPA) and the Arun Valley Ramsar Site, following the publication of their Position Statement (September 2021).

Natural England's 2021 Position Statement 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.

An informative was therefore attached to the above prior approval advising the applicant that the decision relates solely to whether the Prior Approval of the Local Planning Authority was required. It did not confirm that the proposal represented Permitted Development. This HRA application was therefore

submitted, seeking to demonstrate that the water use arising from the permitted development would be less than the historic baseline associated with the agricultural building / use.

In advance of whether this approach would ensure water neutrality was considered, on 31.10.2025 Natural England formally withdrew their 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.

An Appropriate Assessment has been undertaken which demonstrates that the anticipated increase in mains water consumption from this development, alongside all other development granted since the 31.10.2025 will not exceed 3,240,000 litres per day. Natural England have been consulted on this Appropriate Assessment and their standing advice raises no objection to this approach.

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 s.70 of the Conservation of Habitats and Species Regulations 2017, HDPF Policy 31, and paragraph 193 of the NPPF.

**Recommendation: Application Permitted**

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**Plans list for: HRA/25/0013**
(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 | Site Location Plan | 139_03 | 09.04.2025 |

**DELEGATED**

Case Officer sign/initial Hannah Darley Date: 19th November 2025

Authorising Officer sign/initial Guy Everest Date: 19.11.2025