24 September 2026

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Dear Nicola,

WOODFORDS, SHIPLEY ROAD, SOUTHWATER, HORSHAM, RH13 9BQ

APPLICATION UNDER SECTION 73 OF THE TOWN AND COUNTRY PLANNING ACT (1990) (AS AMENDED) FOR A MINOR – MATERIAL AMENDMENT TO PLANNING PERMISSION REF. DC/21/2180, DATED 11TH JULY 2024.

PLANNING PORTAL REF. NO. PP-15019682

On behalf of our client Bellway Homes (Southern Counties) Limited hereafter referred to as ('The Applicant'), please find enclosed details for an application under Section 73 of the TCPA 1990 (As Amended) for a minor material amendment to LPA ref. DC/21/2180, dated 11th July 2024.

The approved development is for the following:

> *"Outline application for the erection of up to 73 new dwellings (up to 100% affordable housing) and retention of existing farmhouse building, associated public open space, landscaping, drainage and highway infrastructure works, including vehicular access from Shipley Road, with all matters reserved except for access.".*

On 31st October 2025, Horsham District Council (HDC) published a statement outlining that Natural England had withdrawn their Water Neutrality Position Statement (September 2021). This followed agreement between the Environment Agency, Natural England and Southern Water that a reduction in the license cap on water abstraction will ensure that the development will not adversely impact the protected Arun Valley habitats.

The position statement made clear that moving forward, HDC will be applying the 2024/25 savings made by Southern Water to allow all development to move forward as water neutral from 1st November 2025. This removes a requirement for new development to achieve Water Neutrality via SNCWS credits or bespoke mitigation secured by legal agreement or conditions.

Importantly, the position statement makes clear that for existing permissions with conditions or S106 obligations requiring Water Neutrality, the Council will support S73 applications to remove this requirement. This will be replaced with a reference to compliance with the Building Regulations Part G Optional Technical Standard (currently 110 l/p/d).

This application seeks an amendment to Condition 12 of DC/21/2180 to omit the requirement to demonstrate Water Neutrality.

This Application has been supported by the following information:

- Application Forms and Certificates, prepared by Savills;
- Approved Site Location Plan reference DC/21/2180;

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Registered office: 33 Margaret Street, London, W1G 0JD

The Application Fee of £2,225.00 has been made as a direct payment to Horsham District Council via the Planning Portal.

Modification of Condition 12

Condition 12 was amended by Non Material Amendment (NMA) LPA ref. DC/24/1974 (dated 22nd September 2025) and is worded as follows:

Pre-Occupation Condition: *The development hereby permitted shall be undertaken in full accordance with the on-site measures of the Motion Technical Note 4: Water Neutrality Statement dated 26 March 2025. No dwelling hereby permitted shall be first occupied until evidence has been submitted to and been approved in writing by the Local Planning Authority that the approved water neutrality strategy for the on-site measures for that dwelling 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 evidence shall include the specification of fittings and appliances used, evidence of their installation evidence they meet the required water consumption flow rates. 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 SACSPA and Ramsar sites in accordance with Policy 31 of the Horsham District Planning Framework (2015), Paragraph 193 of the National Planning Policy Framework (2024), its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), and s40 of the NERC Act 2006 (Priority habitats & species).

The Strategy outlined in the Motion Water Neutrality Statement (dated 17th October 2023) was predicated on delivery of enhancement measures on housing stock controlled by Saxon Weald along with implementation of water efficiency measures within dwellinghouses on the Woodfords site. A Deed of Variation to the legal agreement (S106/25/0001) moved the offsite offsetting mitigation measures to Woodsomes Farm and Rudgwick Brickworks. The measures on both of these sites secured under LPA ref. DC/24/1974 have been completed, with the required evidence submitted under LPA ref. S106/25/0019.

The Applicant seeks to remove Condition 12 and replace this with a Condition requiring implementation of water efficiency fittings that align with the requirements of Part G of the Building Regulations.

The proposed revised wording of Condition 12, is as follows:

> *Regulatory Condition: The dwellings hereby permitted shall meet the optional requirement of building regulation G2 to limit the water usage of each dwelling to no more than 110 litres per person per day. The subsequently installed water limiting measures shall thereafter be retained.*
>
> *Reason: To limit water use in order to improve the sustainability of the development in accordance with Policy 37 of the Horsham District Planning Framework (2015).*

Associated S106 Agreement

A S106 agreement was agreed at the time of the Outline Planning Permission. A Deed of Variation will be undertaken accordingly, to remove unnecessary water neutrality mitigation which may or may not have been completed at the time of this letter.

Conditions

There are a number of conditions attached to DC/21/2180 as set out in **Table 2** below that require modification under this application, as they have either already been discharged or are subject to a live application with a decision pending.

Table 2, Conditions discharged in full under LPA ref. DC/21/2180

No.	Purpose	Revised wording

3	Construction Management Plan	The development shall be completed in accordance with the details submitted under DISC/25/0325, dated 17th February 2026.
4	Construction Environmental Management Plan	The development shall be completed in accordance with the details approved under LPA ref. DISC/25/0325 dated, 17th February 2025.
5	Written Scheme of Archaeological Investigation	The development shall be completed in accordance with the details approved under LPA ref. DISC/25/0318 dated, 24th November 2025 & DISC/26/0140, dated 21st May 2026.
6	Drainage Strategy	The development shall be completed in accordance with the details approved under LPA ref. DISC/26/0125, dated 17th June 2026.
7	Contamination Report	The development shall be completed in accordance with the details approved under LPA ref. DISC/25/0320, dated 13th August 2026.
8	Hazel Dormice Licence	The development shall be completed in accordance with the details approved under LPA ref. DISC/26/0225, dated 13th August 2026.
9	Biodiversity Enhancement Strategy	The development shall be completed in accordance with the details approved under LPA ref. DISC/26/0126 dated, 27th May 2026.
10	Lighting Strategy	The development shall be completed in accordance with the details approved under LPA ref. DISC/25/0322 dated, 5th December 2025.
13	Air Quality Assessment	A Discharge of Condition application has been submitted to HDC under LPA ref. DISC/25/0324, with a decision pending.

This application seeks an amendment to the Outline Permission (DC/21/2180) dated 11th July 2024, to remove the requirement for provision of water neutrality measures.

We trust that the information provided with this application is sufficient to enable processing and validation.

If you have any queries or would like to discuss in more detail regarding this application, please do not hesitate to contact either myself or James Greene (james.greene@savills.com) at this office.

Yours sincerely,

Robert Steele
Director
Savills Planning