Horsham District Council

DELEGATED APPLICATIONS - ASSESSMENT SHEET

APPLICATION NO./ADDRESS:

DC/25/0686
Collyers School , 82 Hurst Road, Horsham, West Sussex, RH12 2EJ

DESCRIPTION:

Variation of condition 2 of previously approved application reference DC/24/0664 (Installation of one temporary office building and two temporary double classrooms) to change the existing condition that limits the period of time for which the buildings can retain on site.

RELEVANT PLANNING HISTORY:

DC/24/0664	Installation of one temporary office building and two temporary double classrooms.	Application Permitted on 09.09.2024

DESCRIPTION OF THE SITE

The application site is located to the north of Hurst Road, within the designated built-up area boundary of Horsham. The site comprises a Grade II Listed Building used as an educational facility. The site is surrounded by residential properties to the north, south, and west, with playing fields associated with the College located to the east.

DESCRIPTION OF THE APPLICATION

The application seeks full planning permission for the siting of 1no. office building and 2no. double classrooms for a temporary period to September 2028.

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 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 33 - Development Principles
Policy 34 - Cultural and Heritage Assets
Policy 35 - Strategic Policy: Climate Change
Policy 36 - Strategic Policy: Appropriate Energy Use
Policy 37 - Sustainable Construction
Policy 40 - Sustainable Transport
Policy 41 - Parking
Policy 42 - Strategic Policy: Inclusive Communities

Policy 43 - Community Facilities, Leisure and Recreation

Horsham Blueprint Business Neighbourhood Plan:
Policy HB1 – Location of Development
Policy HB3 – Character of Development
Policy HB4 – Design of Development

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 2.9 years. 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 4: Horsham Town
Strategic Policy 6: Climate Change
Strategic Policy 7: Appropriate Energy Use
Strategic Policy 8: Sustainable Design and Construction
Strategic Policy 9: Water Neutrality
Strategic Policy 10: Flooding
Strategic Policy 11: Environmental Protection
Strategic Policy 12: Air Quality
Strategic Policy 13: The Natural Environment and Landscape Character
Strategic Policy 17: Green Infrastructure and Biodiversity
Strategic Policy 19: Development Quality
Strategic Policy 20: Development Principles
Policy 21: Heritage Assets and Managing Change within the Historic Environment
Strategic Policy 24: Sustainable Transport
Policy 25: Parking
Strategic Policy 27: Inclusive Communities, Health and Wellbeing

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

Horsham Town Design Statement

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:

INTERNAL CONSULTATIONS

HDC Conservation: No Objection. The need for the proposed buildings is understood, and due to their temporary nature, would not raise an objection to the scheme. If however the length of time is extended, there would be an expectation that the temporary buildings should be replaced with structures that would reflect the quality of the wider campus most notably the grade 2 listed building. As a purely temporary solution it is not considered that the development would detract from the special interest of the listed building.

OUTSIDE AGENCIES

Natural England: No Objection subject to appropriate mitigation being secured. In order to mitigate these adverse effects and make the development acceptable, the delivery, management and maintenance of any measures identified in the applicant's water neutrality statement that are required to ensure that the proposed development will not result in increased levels of abstraction within the Sussex North Water Supply Zone.

Sport England: No Objection. Would expect the buildings to be removed and the land returned to its previous condition as playing field within three months of their removal.

Representations:

5 letters of Objection have been received from 3 separate addresses, and these can be summarised as follows:

- Impact on privacy
- Loss of light
- Unlikely to be temporary

Neighbourhood Council Comments:

Denne Neighbourhood Council (Initial Response): No Objection

The temporary classrooms for students are not ideal, but note the applicant is having pre-application discussions with HDC regarding a permanent building. Providing that there are no further requests for an extension to the period of time for which the building can be retained on site, HDNC has no objection.

Denne Neighbourhood Council (Subsequent Response): Objection until clarification is provided of the new information 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

Principle of Development:

The principle of portacabins on the site has been established by the initial planning permission reference DC/24/0664. The development would continue to support the needs of the educational facility and is considered acceptable in principle, subject to all other material considerations.

Design and Appearance:

Policies 25, 32, and 33 of the HDPF promote development that protects, conserves and enhances the landscape character from inappropriate development. Proposal should take into account landscape 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.

Policy HB3 of the Horsham Blueprint Business 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, meets the changing needs of residents, and minimises the impact on the natural environment.

Paragraph 135 of the NPPF states that planning decisions should ensure that developments function well and add to the overall quality of the area; are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; are sympathetic to local character and history, including the surrounding built environment and landscape setting; establish a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development; and create places that are safe, inclusive and accessible.

The portacabins are located to the north of the existing complex of buildings comprising the site, to an area of land located within the sport fields. This area is partially laid with hardsurfacing where the portacabins are arranged in a ‘U’ shape. The cabins are single storey, modular structures comprising grey plasticol-coated galvanised steel cladding.

The development is located immediately to the north of a complex of modern buildings forming part of the college site. While it is recognised that the modular portacabins are of limited visual quality and appearance, it is recognised that the temporary buildings are of modest scale and located to the rear of the site, where they are not overly visible from public vantage points. The temporary buildings are also be read in the context of nearby built form, where this is considered to reduce the visual prominence of the development.

For these reasons, it is considered that as a temporary form of development their retention for a longer period of time does not result in significant harm to the townscape character and appearance of the site and surroundings to justify a reason for refusal. The development is therefore considered to accord with the above policies.

Heritage and Archaeology:

Policy 34 of 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. Development should reinforce the special character of the District’s historic environment through appropriate siting, scale, form, and design, including the use of traditional materials and techniques. Development should make a positive contribution to the character and distinctiveness of the area, ensuring that development in Conservation Area is consistent with the special character of those

areas. Proposed development should retain and improve the setting of heritage assets, including views, public rights of way, trees, and landscape features.

Following consultation with the Council's Design and Conservation Officer, the need for the development is understood, and due to the temporary nature of the proposal, it is not considered that the development would detract from the special interest of the Listed Building. No objection has therefore been raised.

Residential Amenity:

Policy 32 of the HDPF states that development will be expected to provide an attractive, functional, accessible, safe, and adaptable environment that contribute a sense of place both in the buildings and spaces themselves. Policy 33 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.

The buildings are located to the north-east of the existing complex of buildings, and would be positioned approximately 35m to the east of the residential properties located along Angus Close. The development would provide additional accommodation to support the established use of the site, and is not considered to result in a significant increase in the level of activity above the existing. The development is located an appropriate distance from the nearest residential properties to limit potential impact through loss of light, privacy, and natural light.

For these reasons, the proposed development is not considered to result in harm to the amenities of neighbouring properties or users of land, in accordance with Policies 32 and 33 of the Horsham District Planning Framework (2015).

Highways Impacts:

Policy 40 of the HDPF requires developments to provides safe and suitable access for all vehicles, pedestrians, cyclists, horses riders, public transport and the delivery of goods.

Policy 41 of the HDPF requires adequate parking and facilities to be provided within developments to meet the needs of anticipated users. Consideration should be given to the needs of cycle parking, motorcycle parking, charging plug-in or other low emission vehicles and the mobility impaired.

It is not considered that the development would materially increase or intensify vehicle movements to and from the site, nor significantly increase parking demand at the site.

Water Neutrality:

The application site falls within the Sussex North Water Supply Zone as defined by Natural England which draws its water supply from groundwater abstraction at Hardham. Natural England has issued a Position Statement for applications within the Sussex North Water Supply Zone which states that it cannot be concluded with the required degree of certainty that new development in this zone would not have an adverse effect on the integrity of the Arun Valley SAC, SPA and Ramsar sites.

Natural England advises that plans and projects affecting sites where an existing adverse effect is known will be required to demonstrate, with sufficient certainty, that they will not contribute further to an existing adverse effect. The received advice note advises that the matter of water neutrality should be addressed in assessments to agree and ensure that water use is offset for all new developments within the Sussex North Water Supply Zone.

The Applicant has submitted a Water Neutrality Statement reference 319672 by Arthian Ltd dated 26.06.2025. These applications seek the retention of existing classrooms and an office as well as the addition of four further classrooms and an office. For clarity they have been combined into one appropriate assessment seeking permission for two offices and 8 classrooms. All the buildings are now present on site; however, the below will still refer to the buildings where permission is sought for as proposed. This is to ensure some consistency throughout the application.

The submitted statement refers to the proposed buildings providing the opportunity for 150 new pupils. Further discussions with the applicant about their classroom timetabling has demonstrated that the buildings allow space for the college to accommodate a maximum of 364 additional individuals a week. It is understood that 50 of these individuals have been re-located from other buildings on the site and therefore are not considered new students, with their water usage being included in the schools existing baseline. Given the above the average daily occupancy would therefore be 62.8.

The existing and proposed BREEAM default occupancy calculates an additional 103 individuals a day, beyond that expected by the school. Given this the LPA consider the BREEAM calculations to be most pre-cautionary. The submitted BREEAM calculations show an existing baseline of 110,630 litres per day for the whole school.

Following the installation of water efficient fixtures and fittings in the existing school buildings, set within the extended redline the BREEAM calculations show a proposed baseline: 102,501.21 litres per day for the whole school.

The above demonstrates that the proposal would be water neutral subject to conditions securing the proposed fixtures and fittings. Given the buildings have already been erected a timed condition will be used to secure these and demonstrate their installation. Subject to such condition, there is no no clear or compelling evidence to suggest the nature and scale of the proposed development would result in a more intensive occupation 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 194 and the Council's obligations under the Conservation of Habitats and Species Regulations 2017.

Climate Change:

Policies 35, 36 and 37 require that development mitigates to the impacts of climate change through measures including improved energy efficiency, reducing flood risk, reducing water consumption, improving biodiversity and promoting sustainable transport modes. These policies reflect the requirements of Chapter 14 of the NPPF that local plans and decisions seek to reduce the impact of development on climate change.

It is considered that the proposal would result in no further impact to climate resilience on the site.

Biodiversity Net Gain (BNG):

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) and that every planning permission granted for the development of land in England shall be deemed to have been granted subject to the condition that development must not be begun unless a Biodiversity Gain Plan has been submitted to the planning authority and the planning authority has approved the Plan.

The Biodiversity Gain Plan must show how the development will achieve the required minimum 10% BNG using the statutory biodiversity metric tool, and must demonstrate how the habitats will be managed and maintained for 30 years, starting from the date the development is completed. Off-site gains and significant on-site enhancements will be secured over this period by way of a Legal Agreement.

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:

The proposed development would support the needs of the college and would provide temporary accommodation to support the needs of the established educational facility. The development, given its temporary nature, is not considered to result in harm to the special character and setting of the Listed Building and wider townscape, and would not result in harm to the amenities of neighbouring properties or users of land. In addition, the proposal would not result in a significant impact on the Arun Valley protected sites. The development is therefore considered acceptable, in accordance with all relevant local and national policies.

Recommendation: Application Permitted

Conditions:

2 **Standard Time Condition**: The temporary classrooms and office accommodation hereby permitted shall be removed and the use hereby permitted shall be discontinued on or before the 01.09.2028, and the land shall be restored to its former condition and its use as playing field reinstated on or before 01.12.2028.

Reason: The proposed development is not considered satisfactory as a permanent measure in accordance with Policy 33 of the Horsham District Planning Framework (2015).

3 **Regulatory Condition**: The development hereby permitted shall be undertaken in full accordance with the water neutrality strategy (Water Neutrality Statement reference 319672 Issue 01 dated 26.06.2025). Within 1 month of the date of this permission, evidence shall be submitted to the Local Planning Authority for its approval in writing demonstrating that the approved water neutrality strategy has been implemented in full. The evidence shall include the specification of fittings and appliances used, evidence of their installation, evidence they meet the required water consumption flow rates, and evidence of the installation and connection of the rainwater harvesting system and appropriate storage tanks to provide a minimum 35 days storage capacity. The installed measures shall be retained and operated as such at all times 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), Paragraphs 193 and 19480 of the National Planning Policy Framework (2021), its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), and s40 of the NERC Act 2006 (Priority Habitats & Species).

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/25/0686
Schedule of plans/documents **approved**:

Plan Type	Description	Drawing Number	Received Date
Elevation & Floor plan	Floor and Elevations Existing Double Classroom Building 2	03EXKT	25.04.2025
Location & Block plan	Location Plan and Block Plan	02.KT Rev 1	19.08.2025
Elevation & Floor plan	Existing Floor and Elevations Plan Office Building 1	07EXKT	25.04.2025
Elevation & Floor plan	Floor and Elevations Existing Double Classroom Building 1	05EXKT	25.04.2025
Supporting Docs	Water Neutrality Statement by Arthian dated 26.06.2025	319672 Issue 01	17.07.2025

DELEGATED

Case Officer sign/initial Tamara Dale Date: 18.09.2025

Authorising Officer sign/initial Guy Everest Date: 18.09.2025