Planning Statement
Broadview

Overview

This planning statement supports application DC/25/1920 for the removal of conditions 3 and 4 of the previously approved application DC/25/0289, relating to water neutrality.

Planning permission DC/25/0289 was approved on 2nd May 2025 for the following development: *Change of use of building to provide 6 bedspaces for students with special educational needs to include refurbishment and Internal alterations. Listed building consent was also obtained under DC/25/0290.*

Listed Building Consent was also granted under DC/25/0290 on 5th June 2025.

The existing property is currently a private residential dwelling. The proposed alterations and change of use will enable the building to be utilised as residential accommodation to support existing pupils at New Barn School. A full description of the proposals, context and rationale behind the development can be found in the design and access statement that was submitted as part of the above planning application.

Since the approval of DC/25/0289 & DC/25/0290, significant changes have occurred in respect of water neutrality policy. As a result, the water neutrality conditions attached to the permission are no longer necessary or justified. This statement sets out the policy context and rationale for their removal.

Changes in water neutrality policy

Water neutrality requirements were introduced in 2021 when Natural England advised that all development in the Sussex North Water Supply Zone must achieve no net increase in water use due to potential impacts on the Arun Valley protected sites. This led to planning conditions and obligations requiring water neutrality for all applications.

On 31st October 2025, Natural England issued a withdrawal statement confirming that its position statement of September 2021 had been withdrawn.

Following Natural England's withdrawal statement, Horsham District Council issued a new position statement providing clarity on the handling of planning applications moving forward, with relation to water neutrality. The statement noted,

For individual applications, we will now be using the 2024/25 water efficiency savings made by Southern Water to allow <u>all</u> development to move forward as water neutral from 1st November 2025. These savings were previously to be used by the Sussex North Water Certification Scheme (SNWCS), and amount to some 3,240,000 litres per day. SNWCS, for the avoidance of doubt, will no longer be launched.

For applicants, this means that:

1. *No water neutrality statement is now required;*
2. *No payment into SNWCS is needed to use the Southern Water capacity referred to above;*
3. *No bespoke conditions or s106 obligations are required to demonstrate water neutrality.*

Furthermore, the position statement also clarified, "*For applicants who have existing planning permissions with conditions and s106 obligations requiring compliance with bespoke water neutrality*

mitigation, we will consider applications under s.73 of the Town and Country Planning Act to remove those conditions, and any associated applications to vary or discharge any relevant s106 obligations. "

Request to remove planning conditions

This application seeks the removal of conditions 3 and 4. The full wording of these conditions is as follows:

Condition 3: *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.*

Condition 4: *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.*

The above conditions were originally imposed to secure compliance with Natural England's 2021 water neutrality guidance and the council's corresponding policy position at the time. However, the underlying justification for these conditions has now been removed, given the withdrawal of the Natural England statement.

Removal of these conditions will therefore bring the planning permission into alignment with current legislation and policy. This will also enable the client to implement the permission, without the reliance on the SNWCS, which is now not due to be launched.

Overall, the above conditions are no longer required to make the development acceptable in planning terms and it is therefore requested that conditions 3 & 4 of the approval are removed.