



DELEGATED APPLICATIONS - ASSESSMENT SHEET

APPLICATION NO./ADDRESS:

DC/26/0091

Collyers School , 82 Hurst Road, Horsham, West Sussex, RH12 2EJ

DESCRIPTION:

Removal of Conditions 4 and 6 of approved application DC/25/0748 (Installation of one temporary office building and addition of first floor over the existing two temporary double classrooms (retrospective) Relating to water neutrality.

RELEVANT PLANNING HISTORY:

DISC/25/0337	Approval of Details Reserved by Conditions 3 (lighting or externally located plants), 4 (full details of the water efficiency measures), 5 (northwest facing first floor windows obscured glazed) and 6 (implementation of water neutrality strategy) to approved application DC/25/0748 (Installation of one temporary office building and addition of first floor over the existing two temporary double classrooms (retrospective)).	Split Decision on 22.12.2025
DC/25/0686	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.	Application Permitted on 18.09.2025
DC/25/1683	Removal of condition 3 of previously approved application reference DC/25/0686 (Variation of condition 2 of previously approved application reference DC/24/0664 to change the existing condition that limits the period of time for which the buildings can retain on site) Relating to Water Neutrality.	Application Permitted on 09.01.2026
DC/25/0748	Installation of one temporary office building and addition of first floor over the existing two temporary double classrooms (retrospective).	Application Permitted on 18.09.2025
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.

During the course of the application amendments were made to the description to clarify further the conditions were to be removed from application DC/25/0748. Given the application was included in the original description it is not considered to prejudice any neighbours.

DESCRIPTION OF THE APPLICATION

This application proposes to remove Conditions 4 and 6 of planning permission DC/25/0748 for the addition of an office building and the addition of first floors to the existing single storey temporary classrooms.

Condition 4 required the submission of water neutrality details and condition 6 required the development to demonstrate water neutrality prior to occupation.

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). 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:

None received

PUBLIC CONSULTATIONS:

Representations:

One (1) letter of Objection has been received from one (1) address, objecting to the application on the following grounds:

- The temporary buildings do not appear to be temporary and have not been removed since the building was completed.

Neighbourhood Council Comments:

Horsham Denne Neighbourhood Council: No Objection

has no objection to this application.

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:

The principle of this development is established through the previous approval of DC/25/0748. No material considerations subsequently indicate that a different conclusion to the principle of the temporary classroom and office at this site should be reached.

Therefore, the main consideration since the approval in March 2024 is the impact of Natural England's formal withdrawal of their 2021 Position Statement on Water Neutrality.

Water Neutrality:

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 was required to demonstrate water neutrality.

The application seeks the removal of Conditions 4 and 6 attached to planning permission DC/25/0748, which requires the implementation and verification of a water neutrality strategy in accordance with the approved Water Neutrality Statement.

Condition 4:

Timed Condition: Within one (1) month of the date of this permission, and unless otherwise agreed in writing with the Local Planning Authority, full details of the water efficiency measures required by the approved water neutrality strategy (15.07.2025) shall be submitted to the Local Planning Authority for its approval in writing.

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).

Condition 6:

Timed Condition: Within one (1) month of the date of the details required by condition 4 being approved, evidence shall be submitted to the Local Planning Authority for its approval in writing 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, 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 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).

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.

Other Matters:

Representations have raised concerns about the temporary nature of the classrooms. Application DC/25/0748 secures the classrooms to be removed and the use discontinued on or before the 01.09.2028. This application repeats the condition and does not extend the permission for temporary classrooms further.

Conclusion:

The variations sought would not change the wider considerations of the scheme judged acceptable in September 2025 nor the matters of principle; the variations would not change the substantive nature of the conditions of relevance. The proposed amendments to the application because of the withdrawal of the 2021 Natural England Position Statement

There are no other changes proposed to the development, nor have there been any material changes to policy either nationally or locally that would alter the overall decision making process carried out by the Local Planning Authority.

The proposal is therefore considered supportable.

Recommendation: Application Permitted

Conditions:

- 1 **Approved Plans**
- 2 **Regulatory (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** Any external lighting or externally located plants shall be installed in accordance with the details approved under planning decision notice DISC/25/0337.

Reason: As this matter is fundamental in the interests of residential amenities by ensuring an acceptable noise and lighting level for the occupants of the development in accordance with Policy 33 of the Horsham District Planning Framework (2015).

- 4 **Regulatory** The obscured glazing on the northwest facing first floor windows within the northernmost classroom building on drawing 02KT Rev 1 and detailed in documents approved under planning decision notice DISC/25/0337 windows shall be retained for the duration of the building's presence on the site.

Reason: To protect the privacy of adjacent occupiers in accordance with Policy 33 of the Horsham District Planning Framework (2015).

NOTE TO APPLICANT

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/26/0091

(The approved plans will form Condition 1 on the Decision Notice of all Permitted applications)

Plan Type	Description	Drawing Number	Received Date
Elevation plan	Proposed	03KTF Rev 3	19.08.2025
Elevation plan	Proposed	04KT Rev 3	18.08.2025
Elevation plan		03KT Rev 2	12.08.2025
Location & Block plan		02.KT Rev 1	19.08.2025
Location & Site plan	Fire Access Plan		13.06.2025
Floor plan	Proposed	04KT Rev 3	19.08.2025

DELEGATED

Case Officer sign/initial Alice Johnson Date: 27/03/2026

Authorising Officer sign/initial Matthew Porter Date: 31-03-2026