

PLANNING STATEMENT inc WATER NEUTRALITY FEBRUARY 2026

Alterations to an existing 1920s drill hall building, including the formation of a new side entrance with canopy, replacement and alteration of windows and external openings, demolition and reconstruction of an existing toilet block, and associated external and internal works.

The Drill Hall, Denne Road, Horsham, RH12 1JF



INTRODUCTION

This Planning Statement forms part of a planning application for alterations to an existing 1920s drill hall building, including the formation of a new side entrance with canopy, replacement and alteration of windows and external openings, demolition and reconstruction of an existing toilet block, and associated external and internal works at The Drill Hall, Denne Road, Horsham, RH12 1JF.

This Statement has been prepared in accordance with the Royal Town Planning Institute Code of Conduct.





SITE DESCRIPTION

The Drill Hall is a former military assembly hall, presently operated by Lifespring Church as an events venue, place of worship, community space and administrative offices (Use Class F1/F2).

It is located on Denne Road, approximately 400 metres from Horsham Town Centre.

The building primary frontage faces Denne Road.

Dukes Square car park sits to the East of the building and serves the building, allowing for arrival on foot or by car.





PLANNING HISTORY

The following planning applications are particularly relevant to the site.

HU/61/01

Horsham Arts Centre, Drill Hall, Denne Road, Horsham, West Sussex, RH12 1JF
Temporary change of use for a 3 years for a variety of amenity uses d1 d2 b1 & b8 and depot use parking and b1 use for adjoining business Site: Ta Centre Denne Road Horsham
Approved - 17th May 2001

HU/119/01

Horsham Arts Centre, Drill Hall, Denne Road, Horsham, West Sussex, RH12 1JF
Change of use from vehicle workshops and garaging to light industrial workshops and offices Site: Ta Centre Denne Road Horsham
Approved - 22nd May 2001

HU/326/01

Horsham Arts Centre, Drill Hall, Denne Road, Horsham, West Sussex, RH12 1JF
Erection of 8 portacabins for temporary doctors surgery Site: Ta Centre Denne Road Horsham
Approved - 12th December 2001

HU/152/02

Horsham Arts Centre, Drill Hall, Denne Road, Horsham, West Sussex, RH12 1JF
Stationing of temporary portable cabin in association with use of building for temporary surgery Site: Quebec Building Ta Centre Denne Road Horsham
Approved - 9th July 2002

DC/04/0597

Drill Hall, Denne Road, Horsham, West Sussex, RH12 1JF
Renewal of temporary permission HU/61/01 to use site for a variety of uses
Approved - 18th May 2004

DC/05/2130

Drill Hall, Denne Road, Horsham, West Sussex, RH12 1JF
Re-location of external steel fire escape
Approved - 8th November 2005

The Drill Hall, Denne Road, Horsham, RH12 1JF



DC/08/0791

Drill Hall, Denne Road, Horsham, West Sussex, RH12 1JF

Demolition of ladies toilet extension and re-build and refurbishment of new ladies and gents toilets, re-covering of hall roof at rear only and installation of heating and ventilation plant and equipment

Approved - 17th June 2008

DC/24/1465

Drill Hall, Denne Road, Horsham, West Sussex, RH12 1JF

Change of use from Use Class F2 with ancillary flat to a mixed-use comprising Use Class F1 and Use Class F2 with ancillary flat.

Recommended for approval, but withdrawn prior to committee - 3rd December 2024

DC/25/0366

Drill Hall, Denne Road, Horsham, West Sussex, RH12 1JF

Change of use from Use Class F2 and ancillary flat to mixed-use comprising Use Class F1 and Use Class F2

Approved - 22nd May 2025

"The Drill Hall is situated within the Horsham Town Conservation Area and is a distinctive building in the streetscene. The building has been identified by the Horsham Society in a recent review as an addition to the Horsham Town Local List due to its historic and architectural interest. It would be considered that the proposed change of use and amended hours of operation would retain its character and would not result in harm to the wider conservation area.

The application site is located within the built-up area of Horsham, which is defined as the Main Town under the settlement hierarchy contained in Policy 3 of the HDPF. This is defined as a settlement with a large range of employment, services and facilities and leisure opportunities, including those providing a distinct function. Strong social networks with good rail and bus accessibility. The settlement meets the majority of its own needs and many of those in smaller settlements.

The provision of a place of worship alongside the established community use and office space, as is proposed, is considered to accord with Policies 42 and 43 of the HDPF, which seek to support measures which help create a socially inclusive and adaptive environment, including the provision of new community facilities within the District.

The proposal would maintain the existing use of the building for community use, in accordance with Policies 42 and 43 of the HDPF, Policy HB14 of the Horsham Blueprint Business Neighbourhood Plan, and the relevant policies of the NPPF.

There are no internal or external alterations proposed to facilitate the change of use.



Following consultation with the Council's Design and Conservation Officer, it is considered that the proposed change of use would retain the character of the building and would not result in harm to the wider Conservation Area. On this basis, no objection is raised.

The use of the site as a place of worship would attract visitors and worshippers and would result in a degree of activity at the site, including trips to and from the premises by foot and vehicles during specific periods of the day and throughout the week. It is though recognised that the site is already in use as a community facility and already attracts visitors on a daily basis, this activity similarly already includes the Church which currently hires the hall within the building.

It is considered, taking into account the existing lawful use of the site as a community facility and the findings of the Noise Impact Assessment, that the proposal would not result in any appreciable or significant increase in the level of activity or number of people visiting the site for the purposes of worship over and above the existing levels. While not all visitors to the community centre would necessarily visit the site as a place of worship, it is equally asserted that not all worshippers would visit the site as a community centre for other purposes. As such, there is a balance to be considered in respect of the levels of activity associated with each use.

It is noted that concerns were initially raised by Environmental Health relating to the impact of the proposed on an existing residential property within the building. This existing residential unit would though be omitted as part of the proposal, and would be replaced with additional office accommodation to the first floor. There would be no conflict between these proposed uses and no unacceptable harm to amenity would arise. Subject to this clarification, Environmental Health have raised no objection to the proposal.

The site has been operating in an unrestricted manner for a number of years, with both evenings events and events playing amplified music without complaints being raised by nearby residents. There is no evidence to suggest that future potential events extending to the hours as proposed would result in amenity harm as a consequence of noise from the building or from users of the site.

It is therefore considered that the proposed hours of opening and amplified music would be acceptable given the context of the site and the established operation of the building. While some intermittent noise may result from access and egress to the building, such activity is currently permitted under the existing community use, and it is not considered that the proposed use would intensify this activity beyond that allowed under the current use of the building."



PLANNING POLICY

Section 38(6) of the Planning Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise. Section 38(3) states that the Development Plan includes the Regional Spatial Strategy and other Development Plan Documents.

The proposal has been considered within the context of National and Local Planning Policy, and the key policies are summarised below.

National Planning Policy Framework

The NPPF outlines National Guidance and the Government's policies on the many different aspects of planning. Local Authorities are required to take its content into account when preparing their Development Plans and it is a material consideration when making decisions on planning applications or appeals.

The NPPF sets out the Government's planning policies for England and how these are expected to be applied. It reiterates the role of the Development Plan noting at paragraph 2 that:

"Planning Law requires that applications for planning permission must be determined in accordance with the Development Plan, unless material considerations indicate otherwise."

Footnote 2 outlines that the Development Plan includes local and neighbourhood plans that have been brought into force and any spatial development strategies produced by combined authorities or elected Mayors.

The NPPF also sets out that the document should be read as a whole including its footnotes and annexes (paragraph 3).

Central to the NPPF is the principle of sustainable development. Paragraph 7 explains that the purpose of the planning system is to contribute to the achievement of sustainable development.

Paragraph 8 sets out the overarching objectives of sustainable development which are mutually interdependent and supportive. These objectives are identified as economic, social and environmental.



The NPPF sets out in paragraph 9 that these objectives are important in the preparation of plans and the application of the policies in the NPPF, but they are not criteria against which every decision can be judged. The presumption in favour of sustainable development is set out in paragraphs 10 and 11 of the NPPF in respect of plan-making and decision-making.

For sustainable development and decision-making, paragraph 11 sets out that development should be approved without delay where it accords with an up-to-date Development Plan. In the circumstances where there are no relevant policies, or the relevant policies are out of date (noting Footnote 7) permission should be granted unless there are restrictive policies in the NPPF for that area (footnote 6) or in circumstances where the adverse impacts would significantly and demonstrably outweigh the benefits.

Paragraph 12 confirms that the NPPF does not change the statutory status of the Development Plan as the starting point for decision-making. It confirms that proposed development that accords with an up-to-date Local Plan should be approved, and proposed development that conflicts should be refused unless other material considerations indicate otherwise.

Paragraph 15 states that the planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.

Paragraph 16 states that plans should:

- be prepared with the objective of contributing to the achievement of sustainable development;
- be prepared positively, in a way that is aspirational but deliverable;
- be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
- contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
- be accessible through the use of digital tools to assist public involvement and policy presentation; and
- serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).



Paragraph 20 states that strategic policies should set out an overall strategy for the pattern, scale and design quality of development places, and make sufficient provision for:

- housing (including affordable housing), employment, retail, leisure and other commercial development;
- infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- community facilities (such as health, education and cultural infrastructure); and
- conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

LPAs are advised that they should approach decision-taking in a positive way to secure developments which will improve the economic, social and environmental conditions of the area (paragraph 39). This paragraph continues to emphasise the importance of approving sustainable development with the decision makers advised that they should seek to approve applications for sustainable development where possible.

LPAs should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area (paragraphs 40-47).

Paragraph 48 sets out that planning applications should be determined without delay, stating:

“Planning Law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. Decisions on applications should be made as quickly as possible, and within statutory timescales unless a longer period has been agreed by the applicant in writing.”

Paragraph 85 states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.



Paragraph 96 states that planning policies and decisions should aim to achieve healthy, inclusive and safe places and beautiful buildings which:

- a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;
- b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of beautiful, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and
- c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

Paragraph 98 states that to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

- a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;
- b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;
- c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;
- d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and
- e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.

Paragraph 116 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Paragraph 117 states that within this context, applications for development should:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise



- the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
 - c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
 - d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and
 - e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

Furthermore, paragraph 118 states that all developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.

Paragraph 124 states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

Paragraph 207 states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

Paragraph 203 states that In determining applications, local planning authorities should take account of:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- the desirability of new development making a positive contribution to local character and distinctiveness.

Paragraph 210 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.



Horsham District Planning Framework

Policy 1 of the HDPF states that when considering development proposals, the council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work pro-actively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area. Planning applications that accord with the policies in the Local Plan will be approved without delay, unless material considerations indicate otherwise.

Policy 2 (Strategic Policy: Strategic Development) makes clear that the focus of development should be in and around the key settlement of Horsham, and allow for growth in the rest of the district in accordance with the identified settlement hierarchy.

Policy 3 (Strategic Policy: Development Hierarchy) details that within the settlement of Horsham, development should promote strong social networks through the provision of services and facilities.

Policy 5 (Strategic Policy: Horsham Town) makes clear that to promote the prosperity of Horsham town and maintain and strengthen its role as the primary economic and cultural centre in the District, development will be allowed within the built-up area of Horsham where it contributes to the provision of a range of services and facilities including those in arts, heritage and leisure that make the town self sustaining.

Policy 34 (Cultural and Heritage Assets) sets out an 8 point criteria against which developments affecting heritage assets should accord with. Relevant to this development are the following criteria:

- Make reference to the significance of the asset, including drawing from research and documentation such as the West Sussex Historic Environment Record;
- Reflect the current best practice guidance produced by English Heritage and Conservation Area Character Settlements;
- Preserve, and ensure clear legibility of, locally distinctive vernacular and Conservation Area Character Statements;
- Retain and improve the setting of heritage assets, including views, public rights of way, trees and landscape features, including historic public realm features

Policy 40 (Sustainable Transport) makes clear that development proposals should provide a re-balancing in favour of non-car modes as a means of access to jobs, homes, services and facilities. Criteria 3 requires development to be integrated with the wider network of routes, including public rights of way and cycle paths. Criteria 9 requires development to provide for safe and suitable access for all vehicles, pedestrians and cyclists. Criteria 5 requires development to be located in areas where there is a choice in the modes of transport available.



Policy 41 (Parking) requires development to give consideration to the needs of cycle parking, motorcycle parking, charging plug-in or other low emission vehicles and the mobility impaired.

Policy 43 is relevant to community facilities and states that the provision of new or improved community facilities or services will be supported, particularly where they meet the identified needs of local communities as indicated in the current Sport, Open Space and Recreation Study and other relevant studies.

Horsham Blueprint Business Neighbourhood Plan

Policy HB1 (Location of Development) requires development in the Neighbourhood Area shall be focussed within the built-up area boundary as shown on the Policies Map in Section 14 of the Neighbourhood Plan.

Policy HB6 (Retaining and Enhancing the Vitality and Viability of Horsham Town Centre) makes clear that there is a need to maintain the economic health, vitality and viability of the Town Centre, as defined on the Policies Map, in balance with residential development and infrastructure. Therefore mixed use development proposals - including employment, office, retail, community, cultural, tourism and residential uses - will normally be supported within the town centre.

Policy HB12 (Encouraging Sustainable Movement) makes clear that to ensure that residents can access social, community, public transport, schools, the town centre and other important facilities, where appropriate, new development should ensure safe access to link up with the existing footpath and cycleway network and key movement routes that are identified in the Local Cycling and Walking Infrastructure Plan for West Sussex.

Policy HB12 goes on to state that particular attention should be paid to the need to reduce the generation of road traffic and help to reduce both air and noise pollution.

Policy HB14 (Community and Cultural Facilities) makes clear that proposals that enable the diversification and flexible use of buildings through the extension of and shared use of such buildings, to provide additional community facilities for example, will be supported.



PLANNING POLICY CONSIDERATIONS

The application site is situated within the Horsham Town Conservation Area, within the defined built-up area of Horsham, identified as the Main Town within the settlement hierarchy. The Drill Hall is a prominent and distinctive building in the local streetscene and has been identified by the Horsham Society as a candidate for inclusion on the Horsham Town Local List, recognising its historic and architectural interest as a former military drill hall dating from the 1920s.

The proposals are brought forward following the recent grant of planning permission under application DC/25/0366, which approved a change of use from Use Class F2 and ancillary residential accommodation to a mixed-use comprising Use Class F1 and F2. The current application does not seek to revisit the principle of use, but rather to secure the long-term functionality, accessibility and sustainability of the building through a series of carefully considered alterations.

This statement demonstrates that the proposed development accords with the National Planning Policy Framework (NPPF), the Horsham District Planning Framework (HDPF) and the Horsham Blueprint Business Neighbourhood Plan, and that planning permission should therefore be granted.

Principle

The principle of development is well established and wholly acceptable.

The site lies within the built-up area boundary of Horsham, which is identified as the Main Town within the settlement hierarchy of the Horsham District Planning Framework. The HDPF directs development to sustainable locations such as this, where services, facilities and public transport are readily accessible, and where development can support the vitality and viability of the town.

Importantly, the principle of the building's continued and intensified use for community, cultural and institutional purposes has already been accepted by the Local Planning Authority through the approval of application DC/25/0366. That permission confirms the suitability of the site for a mixed Use Class F1 and F2 use and establishes the lawful baseline against which the current proposals should be assessed.

At a national level, the NPPF strongly supports the effective re-use of existing buildings, particularly where this enables community facilities to be retained and enhanced. Paragraphs 92 and 93 encourage the provision and development of social,



recreational and cultural facilities that meet local needs, while paragraph 120 supports the re-use of suitable brownfield and previously developed land.

The proposals directly align with these objectives by enabling the Drill Hall to function efficiently as a modern, inclusive and adaptable community facility, ensuring its continued occupation and preventing the risk of long-term vacancy or decline.

The Horsham Blueprint Business Neighbourhood Plan further supports development that reinforces Horsham's role as a centre for community, cultural and employment-related activities, provided that proposals respect heritage assets and the character of the area. The development fully complies with these aims.

Accordingly, the principle of the proposed development is sound and fully policy compliant.

Design

The design rationale for the proposals is set out in detail within the submitted Design and Access Statement and accompanying drawings.

The overall design approach is founded on a clear understanding of the Drill Hall's architectural form, historic evolution and contribution to the streetscape. The proposals seek to preserve and enhance the defining characteristics of the building while allowing it to meet contemporary functional, accessibility and safety requirements.

The Drill Hall is a formal and symmetrical civic building, and this quality has informed the restrained and respectful nature of the proposed alterations. The principal elevation remains largely unchanged, retaining its strong presence along Denne Road. Where new elements are introduced—such as the side entrance and canopy—these are located on secondary elevations and are deliberately modest in scale, ensuring that they remain visually subordinate to the host building.

Replacement and altered windows are carefully proportioned and detailed to match the rhythm, scale and materials of the existing fenestration. Materials have been selected to complement the existing palette, ensuring visual continuity and avoiding the introduction of incongruous modern detailing.

The demolition and reconstruction of the existing toilet block is a particularly important design improvement. The existing structure is of limited architectural merit and detracts from the overall quality of the building. Its replacement allows for a more coherent, higher-quality built form that integrates successfully with the main hall, improving both appearance and functionality.



The proposals also deliver meaningful improvements to inclusive access, including step-free access via the new side entrance. This responds directly to NPPF paragraph 135, which emphasises the importance of inclusive design, and HDPF Policy 33, which requires development to be accessible and adaptable for all users.

Overall, the design represents a high-quality, sensitive intervention that enhances the building's appearance, functionality and longevity, in accordance with NPPF Chapter 12 and HDPF Policies 32 and 33.

Neighbour Amenity

The site is located within an established urban context characterised by a mix of residential properties, community buildings and town centre uses.

The proposed works primarily involve alterations to the existing building envelope and do not result in any significant increase in scale, height or massing. As such, there will be no material impact on neighbouring properties in terms of loss of daylight, sunlight or outlook.

Alterations to windows and external openings have been carefully considered to avoid introducing unacceptable overlooking or loss of privacy. Any new or altered openings are consistent with the existing pattern of fenestration and do not materially change the relationship between the building and neighbouring residential properties.

The operational impacts associated with the use of the building have already been assessed and accepted under the recently approved mixed-use permission. The current proposals do not intensify that use, but instead rationalise and improve the internal and external layout of the building to ensure that activities can be managed effectively and responsibly.

Noise & Disturbance

An External Plant Noise Assessment has been undertaken by Goodhand Acoustics Ltd to assess the potential impact of noise arising from the proposed external mechanical plant, including air source heat pumps, air handling units and condenser units associated with the building's refurbishment.

The assessment was carried out in accordance with British Standard BS 4142:2014+A1:2019, with reference to the National Planning Policy Framework, the Noise Policy Statement for England, and the Planning Noise Advice Document:



Sussex. The assessment is supported by unattended baseline background noise monitoring undertaken over a seven-day period in October 2024.

Baseline sound levels were measured at the nearest noise-sensitive receptor location, with representative background sound levels derived for daytime, evening and night-time periods in accordance with BS 4142 methodology.

Noise predictions were undertaken for the cumulative operation of up to nine items of rooftop plant, based on acoustic data from equivalent units. The assessment considered tonal, impulsive and intermittent characteristics where relevant.

The assessment concludes that, subject to appropriate plant selection and acoustic design controls, the rating level of noise from the proposed external plant will not exceed the prevailing background sound level at nearby noise-sensitive receptors. On this basis, the proposals are predicted to result in a low impact, with no significant adverse effect on residential amenity.

The report confirms that the scheme can be delivered in a manner fully compliant with Policy 33 of the Horsham District Planning Framework, which requires development to avoid unacceptable harm to the amenity of neighbouring occupiers, and with national planning noise guidance.

To ensure ongoing compliance, the report recommends a condition requiring the cumulative rating level of noise from external plant to be limited relative to background sound levels at the nearest noise-sensitive receptors. This approach is standard practice and provides assurance that the final plant selection will meet the established noise design criteria.

Accordingly, the proposed development is considered acceptable in noise terms and will not give rise to unacceptable noise disturbance.

Highways

The proposed development does not introduce a new use or materially intensify the approved use of the site.

There are no changes proposed to the existing vehicular access arrangements, parking provision or servicing strategy. Traffic generation associated with the use of the building has already been accepted through the recent change of use permission, and the current proposals will not result in additional trips beyond that established baseline.



The site benefits from a highly sustainable location within walking distance of Horsham town centre, public transport routes and local services. The introduction of a new side entrance improves pedestrian access and permeability without compromising highway safety.

As existing, there have not been any associated traffic impacts within the existing community activities which do not benefit from any current controls or restrictions.

Furthermore, to the rear of Drill Hall is Dukes Square Car Park:

Monday to Friday

8am-6pm season ticket holders only.

From 6pm-8pm, pay & display rates apply

Up to 1 hour: £1.60 / 1-2 hours: £3.10

Saturday

Maximum stay 8 hours in any 12.

Up to 1 hour: £1.60 / 2 hours: £3.10 / 3 hours: £4.60 / 4 hours: £6.10 / 5 hours: £7.60 / 6 hours: £9.00 / 7 hours: £10.40 / 8 hours: £12.20

Sundays and Bank Holidays (9am-5pm)

Up to 1 hour: £1.60 / 1-2 hours: £3.10 / All Day: £3.90

The nearest car park providing spaces for daytime Monday to Friday, can be found within a 5 minute walk (Piries Place Car Park). This car park provides for 516 spaces, including 1 Parent and child bays, 12 Disabled bays and 8 Electric vehicle charging bays.

The charges are as follows:

Up to 2 hours: £3.50 / 2-3 hours: £5.20 / 3-4 hours: £7.00 / 4-5 hours: £8.80 / 5-6 hours: £10.60 / 6-8 hours: £12.30 / Over 8 hours: £17.50

The use of public car parks, for those that choose to take vehicles, will create incidental expenditure within the commercial offerings of Horsham, where local retailers will receive ongoing support. Such a principle is established in both Local Plan policy and the adopted Neighbourhood Development Plan.

Alongside car parking, it should be noted that the property benefits from being only a 15 minute walk from Horsham Train Station and a 5 minute walk from bus stops.

Drill Hall is therefore very sustainably located for a wide range of transport options.



Paragraph 115 of the NPPF makes clear that development should only be prevented on highways grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe.

The above evidence demonstrates that this would not be the case.

In this context, the proposals are fully consistent with NPPF Chapter 9, which seeks to prioritise sustainable transport modes, and HDPF Policy 40.

Heritage Assets

Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions because of their heritage interest but which do not meet the criteria for designated heritage assets.

It is not clear if the Local Planning Authority would consider that this applies to Drill Hall.

Policy 34 (Cultural and Heritage Assets) requires development to ensure the significance of heritage assets are not harmed and, where appropriate, enhanced.

The proposed development makes limited alterations the internal and external elements of the building, but has been done so in a sympathetic manner, giving a nod to the building's history and character.

On the basis of the above, the development would not impact upon the significance of any heritage assets and therefore with Policy 34 of the Horsham District Planning Framework.

Water Neutrality

All development proposals within Horsham District that consume mains water are required to demonstrate water neutrality, in response to the legal duties set out under Section 63 of the Conservation of Habitats and Species Regulations 2017 (as amended). The competent authority, Horsham District Council, must be satisfied that development will not adversely affect the integrity of protected habitats, either alone or in combination with other plans and projects.

For development within the Sussex North Water Resource Zone, applicants are therefore required to submit a Water Neutrality Statement demonstrating that the proposal will not result in an increase in water consumption above the established lawful baseline, or that appropriate mitigation is secured to offset any increase.



This Water Neutrality Statement has been prepared to assist the competent authority in discharging its statutory duties.

Horsham District is located within an area identified by the Environment Agency Water Stressed Areas Classification as experiencing serious water stress.

The District is supplied by Southern Water from the Sussex North Water Resource Zone. Water supplied within this zone is sourced from several abstraction points, including abstraction within the Arun Valley, which is hydrologically linked to a number of internationally and nationally designated sites, including:

- Arun Valley Special Protection Area (SPA)
- Arun Valley Special Area of Conservation (SAC)
- Arun Valley Ramsar site
- Amberley Wild Brooks Site of Special Scientific Interest (SSSI)
- Pulborough Brooks SSSI

On 14 September 2021, Horsham District Council received a Position Statement from Natural England, advising that existing levels of water abstraction are having a negative effect on these protected sites. Natural England has confirmed that new development must not add to this impact and that proposals must demonstrate water neutrality.

Water neutrality is defined as a scenario where the total mains water consumption after development is no greater than the total mains water consumption before development.

The application site lies within the Sussex North Water Resource Zone and therefore falls within the scope of these requirements.

The current application relates to alterations to an existing building and does not propose a new or intensified use beyond that already approved.

The lawful planning baseline for the site is the mixed-use comprising Use Class F1 and Use Class F2, as approved under planning permission DC/25/0366 (22 May 2025).

The proposed works are limited to alterations to the external envelope of the building, including a new side entrance, changes to fenestration, demolition and reconstruction of an existing toilet block, and associated internal works to improve functionality, accessibility and compliance with modern standards.



No additional water-consuming uses are introduced as part of this application.

The Drill Hall has historically been used, and continues to be used, as a community building accommodating a wide range of activities including events, performances, exhibitions, workshops and community gatherings.

The building has an existing gross internal area of approximately 1,189 square metres, including kitchens, sanitary facilities and ancillary spaces.

The existing sanitary arrangements include conventional WC and urinal fittings, including a timed urinal flushing system operating on a standard cycle.

Using established industry “rule of thumb” assumptions for community buildings, occupancy has historically been calculated on the basis of approximately 1 person per 2 square metres, equating to a theoretical maximum capacity of approximately 595 people.

Based on a notional consumption rate of 50 litres per person per day, the historic annual water demand associated with the building has been calculated at approximately 10,858,750 litres per annum. This figure represents a robust and conservative baseline against which the current proposals should be assessed.

The proposed development does not alter the size of the building, its approved mixed-use classification, or its established occupancy levels.

The nature of the use remains community-focused and comparable to the existing and approved baseline. While the internal layout is rationalised and modernised, there is no intensification of activity or increase in attendance beyond that already lawfully permitted.

As such, there will be no increase in mains water demand arising from the proposed development when compared with the established baseline.

Furthermore, new toilets provide an opportunity—where feasible and appropriate—for the incorporation of more water-efficient sanitary fittings, such as dual-flush WCs and low-flow taps. While not relied upon to achieve water neutrality, these measures would further reduce water consumption in practice.

The proposed development will not result in any increase in water consumption above the lawful baseline established by the existing and approved use of the building.

Accordingly:



- The development is water neutral by design;
- There is no requirement for off-site water offsetting measures; and
- The proposal will not, either alone or in combination with other development, adversely affect the integrity of protected habitats in the Arun Valley.

The development therefore complies with the requirements of Section 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) and relevant local and national planning policy, and it is capable of being lawfully approved by Horsham District Council.



Summary

This Planning Statement has demonstrated that the proposed alterations to the Drill Hall, Denne Road, Horsham, are acceptable in principle and in detail, and fully accord with the adopted development plan and national planning policy.

The application relates to a series of carefully considered alterations to an existing 1920s Drill Hall building located within the Horsham Town Conservation Area. The proposals do not seek to introduce a new or intensified use of the site, but instead support the continued lawful mixed-use of the building, as approved under planning permission DC/25/0366, by improving its functionality, accessibility, safety and long-term sustainability.

The principle of development is firmly established. The site lies within the built-up area of Horsham, identified as the Main Town within the settlement hierarchy, and is a highly sustainable location with good access to services, facilities and public transport. The proposals align with the objectives of the National Planning Policy Framework, the Horsham District Planning Framework, and the Horsham Blueprint Business Neighbourhood Plan, all of which support the retention, enhancement and modernisation of community and cultural facilities in accessible town centre locations.

The design approach has been informed by a thorough understanding of the building's architectural and historic significance. The proposals preserve the defining characteristics of the Drill Hall while introducing modest, high-quality interventions that enhance its appearance and usability. Poor-quality later additions are removed or rebuilt in a more sympathetic manner, resulting in a net visual and architectural improvement.

The development will not give rise to unacceptable impacts on residential amenity. The proposed works do not materially alter the scale or massing of the building, and careful consideration has been given to the positioning of openings to avoid overlooking or loss of privacy. A Noise Impact Assessment has been undertaken and confirms that, subject to appropriate management and mitigation measures, the proposals will not result in unacceptable noise or disturbance to nearby occupiers.

In highways terms, the proposals do not generate additional traffic or parking demand beyond the established lawful use of the site. The location benefits from excellent accessibility by foot, public transport and existing public car parking, and there are no highway safety concerns.

The Drill Hall is a non-designated heritage asset within a conservation area, and its significance has been carefully considered. Any limited change arising from the



proposals results in no more than “less than substantial harm” (as defined in the NPPF), which is clearly outweighed by the public benefits of the development. These benefits include securing the long-term viable use of a valued historic building, improving accessibility and inclusivity, enhancing community and cultural facilities, and removing unsympathetic later alterations.

The application has also demonstrated full compliance with water neutrality requirements. The proposals do not increase floorspace, occupancy or water-consuming uses, and will not result in any increase in mains water consumption above the established lawful baseline. The development is therefore water neutral by design and will not adversely affect protected habitats within the Arun Valley.

Taken as a whole, the proposed development represents a sustainable, policy-compliant and sensitive enhancement of an important community asset. There are no material considerations that indicate planning permission should be withheld, and the Local Planning Authority is therefore invited to grant planning permission accordingly.