



Planning Committee North – 10th May 2022

Agenda Item 06 – DC/21/1263

Twenty Five Acres, Leechpond Hill, Lower Beeding, West Sussex

1. PURPOSE OF THE REPORT

- 1.1 To update Committee Members following the review of additional information.

2. PLANNING ASSESSMENT

- 2.1 Following the publication of the Committee Report, additional information has been submitted relating to water neutrality and further comments have been received from WSCC Highways.

Water Neutrality

- 2.2 A Water Neutrality Statement (WNS) was received by the Council on 28.04.2022. There are no buildings present on site which is laid to pasture. As such, the existing water use is presumed to be nil. The submitted WNS details that average 500kg horses consume an average of 40 litres per day (l/d). The total water use has been calculated as 600l/d at an occupancy of 15 horses. However, Officers note that the stabling is capable of accommodating 20 horses, so the proposed use could likely be higher (800l/d).
- 2.3 The site will also make use of a water walker as part of the rehabilitation process. The walker itself will hold approximately 60,000l of water- this would require an initial fill-up and replacement every 18 months. In addition, hose use would be needed on a daily basis equating to a further 2,100l/d.
- 2.4 At paragraph 2.1.1, the WNS states that *'the proposed works will not utilise any utilities for on-site personnel e.g. sinks, WC etc. and as the plans only indicate stables, the water demand from the propose[d] site will come from the needs of the horses'*. However, at paragraph 2.1.5, the WNS states that approximately 129.7l/d would be required to staffing facilities.
- 2.5 The total initial water demand for the proposed works is estimated at 62,339.3l/d, and the constant water demand at 2,339.3l/d.
- 2.6 At Section 3, the WNS recommends efficiency measures that could be utilised to reduce the daily water use from 2,339.3l/d to 1,421.35l/d. At Section 4, the WNS states that rainwater

harvesting would also be used to further reduce the water demand further, and storage for 21 days drought contingency. Section 5 of the WNS states that existing wells would be used to store excess water (up to 80,000l). The report asserts that through the use of these water reduction and harvesting methods, the proposal would be neutral.

- 2.7 Officers do not dispute the calculations regarding efficiencies and resultant reductions, and accept that the level of rainwater harvesting could in most instances cater for the needs of the horses in terms of drinking water and wash down. Though the WNS caters for 15 horses, and the site has the capacity for 20, the level of harvesting gives some head room to allow for an increased accommodation.
- 2.8 However, Officers have identified several deficiencies with the statement, including:
- The WNS provides for a 21-day drought contingency. Drought storage should provide for at least 35-days' supply to provide robustness to address climate change, equivalent to the most recent drought periods experienced in the region
 - Basins are proposed to use harvested water. Whilst this would use recycled water, no filtration details have been provided, and therefore it is not possible to ascertain whether this water would be safe to use.
 - The WNS accounts for 5x staff members only. No guest / visitor water use has been calculated. Given the level of stabling and the size of the client viewing office and galleries, there is potential for a further increase in water consumption over what has been calculated (129.7l/d)
 - The WNS details that water will be stored within existing wells present on the site. No information has been provided as to the location of these wells or how these would be connected to the development. It is also unclear if the wells are connected to the water table- if so, abstraction from these wells would take water from the source rather than at Hardham. In order to be satisfied that this is not the case, clear and convincing geological surveys would be needed.
- 2.9 Whilst there is some merit to the contents of the submitted WNS, Officers are not satisfied that enough information has been submitted to provide the certainty needed to demonstrate that the development would be water neutral. As such, it has not been possible to progress the application to Appropriate Assessment. Therefore, given that a WNS has now been submitted in support of the application, is it recommended that reason for refusal 3 is amended to incorporate the following wording:

Notwithstanding information submitted, the application has not satisfactorily demonstrated with a sufficient degree of certainty that the proposed development would not contribute to an existing adverse effect upon the integrity of the internationally designated Arun Valley Special Area of Conservation, Special Protection Area and Ramsar sites by way of increased water abstraction, contrary to Policy 31 of the Horsham District Planning Framework (2015), Paragraphs 179 and 180 of the National Planning Policy Framework (2021), thus the Local Planning Authority is unable to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), and s40 of the NERC Act 2006 (Priority habitats & species).

Highways Comments

- 2.9 WSCC Highways initially objected to the proposal, stating that further information is required regarding the access (see 3.7 and 6.43-46 of the Committee Report). In response to this, an updated Transport Statement was received. Further comments from WSCC were received on 09 May 2022.
- 2.10 The revised Transport Statement include a Stage 1 Road Safety Audit, which WSCC have raised no objections to. WSCC noted that whilst the access was requested to be widened to

4.5m, the 3.8m widened access includes swept path analysis which demonstrates turning of a larger vehicle can turn and enter the site access and this shows that within the access in its current dimensions workable. WSCC comment further that the requested revisions and additional information have been provided as well as justification for the design. WSCC have concluded that the additional information has addressed their concerns and recommend conditions to be attached in the event that planning permission were to be granted.

- 2.11 With the revised Transport Statement and the updated comments from WSCC in mind, Officers are satisfied that the second reason for refusal relating to safe access attached to the Committee Report can be removed.

Drainage Details:

- 2.12 Further to the committee report, additional drainage details have also been received for this proposal. As outlined in the report, no objection has been raised in principle to the development from the HDC Drainage Officer or from WSCC Flood Risk Management in terms of drainage and flooding. If recommended for approval, suitable conditions could be imposed which would require full drainage details, including a detailed surface and foul water drainage statement, to be submitted for approval.

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