

From: Planning@horsham.gov.uk
Sent: 23 January 2026 01:32
To: Planning
Subject: Comments for Planning Application DC/25/2057
Categories: Comments Received

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 23/01/2026 1:31 AM.

Application Summary

Address:	Land North of Little Slaughterford Chapel Road Barns Green West Sussex
Proposal:	Proposed development of 68 dwellings with vehicular and pedestrian accesses, public open space, hard and soft landscaping and associated works including supporting foul and surface water drainage works, and works to existing culverted watercourse on site.
Case Officer:	Alice Johnson

[Click for further information](#)

Customer Details

Address:	Valewood Valewood Lane Barns Green
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Comments Details

Commenter Type:	Member of the Public
Stance:	Customer objects to the Planning Application
Reasons for comment:	<ul style="list-style-type: none">- Other- Overdevelopment- Trees and Landscaping
Comments:	<p>This letter supplements my earlier objection submitted. I am writing again because the statutory consultee responses now available on the planning portal raise significant additional concerns - most notably that the Council's own Housing Officers have stated they 'cannot support this site.' I would be grateful if both submissions are placed before the Planning Committee.</p>

Dear Planning Officer,

OBJECTION: Application DC/25/2057 Land North of Little Slaughterford, Chapel Road, Barns Green 68 Dwellings - Miller Homes

I am writing to object to this application in the strongest possible terms. I have lived in Barns Green for 16 year and have witnessed first-hand the cumulative strain that recent development

has placed on our village infrastructure. I have reviewed the applicant's submissions carefully and discussed the planning issues with a professional in the field to ensure my concerns are properly framed.

I have also reviewed the statutory consultee responses now available on the planning portal. I note with concern that the Council's own Housing Officers have stated they "cannot support this site" - a matter I address below. I would be grateful if this letter could be placed before the Planning Committee in full.

A PRELIMINARY POINT: THIS APPLICATION CANNOT YET BE DETERMINED

Several consultee responses indicate that further information is required before this application can properly be assessed:

1) Housing Officers state they "cannot support this site until reassurance can be provided that delivery is possible, and the affordable tenure is reconsidered"

2) Environmental Health has requested "more information" - noting that the Air Quality Assessment contains inaccurate figures and incorrect damage cost calculations

3) Southern Water's response addresses only the immediate connection point and does not assess the documented sewage overflow problems or cumulative network capacity

Until these matters are resolved, determination would be premature.

THE NEIGHBOURHOOD PLAN: THE COMMUNITY HAS ALREADY SPOKEN

Our Neighbourhood Plan was approved at referendum on 4 September 2025 and made on 8 October 2025. This wasn't some abstract bureaucratic exercise - residents voted, and the Plan reflects years of community consultation about where development should and shouldn't go. The Plan allocates specific sites for housing. This field at Chapel Road was not among them. That was a deliberate choice, not an oversight.

The applicant's Planning Statement tries to dismiss this by claiming the Neighbourhood Plan contains "no policies which prevent development." With respect, this misses the point entirely. The Plan identifies where the community accepts growth; this site was consciously excluded. If speculative applications can simply bypass neighbourhood plans, what was the point of the whole exercise?

NPPF paragraph 14 exists precisely to protect communities in this situation. It states that where a neighbourhood plan is less than five years old and allocates sites to meet housing need, the adverse impact of conflicting development "is likely to significantly and demonstrably outweigh the benefits." Our Plan ticks both boxes.

The Government's own Planning and Infrastructure Bill guidance (September 2025) states that decisions about what to build and where "should be shaped by local communities." This application ignores that principle completely.

THE APPLICANT ADMITS THIS CONFLICTS WITH THE DEVELOPMENT PLAN

At paragraph 7.5 of their Planning Statement, Miller Homes concedes something rather striking:

"Being set outside of the built up area boundary and not essential to this countryside location, the proposal would be in conflict with policies 2, 3, 4 and 26 of the HDPF."

So even the applicant accepts this doesn't comply with the adopted Local Plan. Their entire case rests on the "tilted balance" because Horsham lacks a five-year housing land supply.

But the tilted balance isn't a free pass. NPPF paragraph 11(d)(i) makes clear it doesn't apply where Framework policies indicate development should be restricted - including for habitats sites, irreplaceable habitats like ancient woodland, and flood risk. Paragraph 14's neighbourhood plan protection operates separately on top of this.

THE COUNCIL'S OWN HOUSING OFFICERS DO NOT SUPPORT THIS APPLICATION

The consultation response from Housing Officers dated 15 January 2026 is damning. It states: "Housing Officers cannot support this site until reassurance can be provided that delivery is possible, and the affordable tenure is reconsidered."

The reasons given are significant:

1) Wrong Housing Mix

The proposed affordable housing is heavily weighted towards 2-bedroom units (76% of provision). Yet the Housing Register shows that 61% of demand is for 3-4 bedroom family homes - households who are waiting three times longer than those needing smaller accommodation. As Housing Officers state: "The scheme would largely eliminate the identified two-bedroom requirement while failing to adequately address the most acute and long-standing housing needs within the parish."

2) Deliverability Concerns

Housing Officers express concern that the scheme may not attract Registered Providers due to its small size and rural location. They warn of "a risk that the applicant may seek a commuted sum in lieu of on-site affordable housing provision at a later stage."

Implications

If the Council's own Housing team doesn't support this application, how can it be argued that the benefits outweigh the harms? The applicant's primary justification is addressing housing need - yet the homes proposed don't match the need identified on the Housing Register.

SEWAGE: A SYSTEM ALREADY IN CRISIS

I note that Southern Water's response dated 22 January 2026 states there is "adequate capacity in the local sewerage network" at the connection point.

However, this response is inadequate for three reasons:

1) It Only Assesses the Immediate Connection

The response confirms capacity at "manhole reference TQ12265901" - the immediate connection point. It does not assess downstream network capacity or the system's overall ability to cope.

2) It Ignores Documented Overflow Events

The Council's own committee reports have documented that Barns Green experienced 43 sewage overflow events totalling 411 hours in 2022 - more than 17 days of raw sewage discharge. Southern Water's response makes no mention of these overflow events and provides no assurance that additional flows won't exacerbate them.

3) No Cumulative Assessment

The response does not consider cumulative impact from:

- The 32 homes at Sumners Fields (recently completed)
- The 50+ homes allocated in the Neighbourhood Plan at other sites

I have submitted a Freedom of Information request to Southern Water for full overflow data and network capacity assessments on the 21st January 2026. I request that determination is deferred until this information is available.

ELECTRICITY: THE GRID CAN'T COPE EITHER

The Energy Statement confirms all 68 homes will use Air Source Heat Pumps for heating - a significant electrical load. Yet the documents contain no consultation with UK Power Networks and no assessment of grid capacity.

I understand that the recent Sumners Fields development requires a backup diesel generator because the local network cannot reliably supply those homes. If that's true for 32 houses, how can we possibly add another 68 with electric heating?

I have written to UK Power Networks requesting clarification on grid capacity. I request that the Council obtains a formal response before this application is determined.

TRANSPORT: THE NUMBERS DON'T ADD UP

The Transport Statement relies heavily on a "Vision Scenario" assuming significant modal shift away from private cars. In a rural village with almost non-existent public transport, this is fantasy.

The applicant's own data shows 81% of local residents drive to work. Christ's Hospital station is 3.7km away - too far for most people to walk or cycle regularly. And the bus service? The Transport Statement's own timetable reveals:

- Monday: 4 buses
- Tuesday: 8 buses
- Wednesday: 2 buses (at 07:00 and 16:57 only)
- Thursday: 8 buses
- Friday: 4 buses
- Evenings/weekends: Nothing

Two buses on a Wednesday. No evening services at all. This is not a location where sustainable transport is a credible alternative to the car, and the Transport Statement's optimistic assumptions shouldn't be given any weight.

More fundamentally, NPPF paragraph 116 requires assessment of "residual cumulative impacts" on the road network. The applicant has only modelled the site access junction, dismissing wider impacts as "negligible." This ignores the 32 homes at Sumners Fields, the 50+ homes allocated in the Neighbourhood Plan, and the combined effect on the Chapel Road/Two Mile Ash Road junction. The cumulative traffic impact simply hasn't been assessed.

HARM TO ANCIENT WOODLAND - NATURAL ENGLAND STANDING ADVICE

The western boundary of the site adjoins Ancient Semi Natural Woodland recorded on the Ancient Woodland Inventory as reference ANCWO0122269. This is an irreplaceable habitat protected under NPPF paragraph 186(c), which states:

"Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists."

I have consulted Natural England regarding this application. While they have confirmed they have not been formally consulted by the Council (the nearest SSSI being 10km away), they have emphasised that their Standing Advice on ancient woodland "is a material consideration in determining applications in the same way as any bespoke advice we provide."

The Council must therefore apply the Standing Advice when determining this application. Having reviewed it carefully, I submit that the proposed development conflicts with the Standing Advice in multiple respects:

1 - Inadequate Buffer Zone

The applicant proposes only a 15-metre buffer - the minimum recommended in the Standing Advice. However, the Standing Advice explicitly states: "Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone."

A larger buffer is warranted in this case because:

- Dormice are present: The applicant's own Dormouse Survey Report (2025) confirms the presence of hazel dormice - a European Protected Species - in hedgerows connecting to the woodland
- Significant recreational pressure: 68 homes will generate approximately 156+ residents, plus visitors and pets, creating substantial pressure on the woodland edge
- Drainage sensitivities: The site is on Weald Clay with documented drainage issues; changes to surface water management could affect the woodland's hydrology

2 - Footpath Through the Buffer Zone

Most seriously, the applicant proposes to route a permanent public footpath through the 15-metre buffer zone, connecting the development to the bridleway network. The Standing Advice is clear on what buffer zones should comprise:

"A buffer zone should consist of semi-natural habitats such as: woodland; a mix of scrub, grassland, heathland and wetland."

And crucially:

"You should not approve development proposals, including gardens, within a buffer zone."

A surfaced, maintained footpath serving as the primary pedestrian route for 156+ residents is not a semi-natural habitat. It is a form of development within the buffer zone that the Standing Advice explicitly states should not be approved.

The applicant attempts to justify this by claiming the route utilises an "existing agricultural access point." This reasoning is fundamentally flawed:

- An occasional agricultural vehicle passing a few times per year is not comparable to a permanent recreational path used daily
- The footpath will create a "desire line" encouraging regular incursion into the ancient woodland
- Dog walkers, children, and residents will inevitably stray beyond the path into the woodland itself

3 - Indirect Effects Will Cause Deterioration

The Standing Advice identifies specific indirect effects that can cause deterioration of ancient woodland. The following will all occur if this development proceeds:

How This Development Causes It:

- "Increasing disturbance to wildlife from additional people and traffic" 68 homes = 156+ residents + 200+ vehicle movements daily
- "Increasing damage to habitat from trampling" Footpath through buffer; inevitable informal access beyond
- "Increasing damaging activities like domestic pets" Cats predating wildlife; dogs disturbing ground-nesting birds and dormice
- "Increasing light and air pollution" Street lighting, car emissions, changed drainage patterns

NPPF paragraph 186(c) protects ancient woodland from deterioration, not just direct loss. The cumulative indirect effects from 68 homes will cause deterioration of this irreplaceable habitat over time.

4 - No Wholly Exceptional Reasons Exist

Speculative housing development on an unallocated site does not constitute a wholly exceptional reason. The community has, through the Neighbourhood Plan, identified other sites where housing can be accommodated without harm to ancient woodland. This site was deliberately excluded. I respectfully submit that the application should be refused on ancient woodland grounds unless the footpath is removed entirely from the buffer zone and a minimum 25-30 metre buffer is provided.

AIR QUALITY ASSESSMENT ERRORS

I note that the Environmental Health consultation response dated 21 January 2026 identifies significant errors in the submitted Air Quality Assessment:

- Two different traffic figures are used (341 and 329) without explanation
- The Emissions Factor Toolkit outputs are described as "inaccurate" - "too low for NO2

emissions and higher than expected for PM2.5"

- The damage cost calculations do not follow the correct methodology
- Environmental Health carried out their own calculations and "arrived at a much lower cost than was reported"

The applicant has been asked to submit corrected figures. This application should not be determined until accurate air quality information is provided.

CUMULATIVE IMPACT: THE VILLAGE HAS TAKEN ITS SHARE

Barns Green has already accommodated substantial growth:

1. Sumners Fields - 32 homes, recently completed, a few hundred yards from this site
2. Neighbourhood Plan allocations - 50+ additional homes at sites the community has accepted

Adding 68 more would increase the village by approaching 40% in the space of a decade. At what point does cumulative impact become unacceptable?

VILLAGE CHARACTER AND HERITAGE

The Neighbourhood Plan's Landscape Character Assessment describes the fields north and west of the village as "important small pastoral fields" that "provide important green gaps that contribute to a settlement with rural character and provides a transition to the wider countryside." That's precisely what this field does. It's the green buffer between the village centre and open countryside. Building here would:

- Destroy this green gap entirely
- Harm the setting of listed buildings including Little Slaughterford, Bennetts, and the Queen's Head
- Surround the pub - a vital community asset - with housing

The field also hosts the annual Classic Car Show (raising tens of thousands for charity) and Run Barns Green (supporting St Catherine's Hospice). These community events would be lost forever.

OVERDEVELOPMENT OF THE SITE

Even the withdrawn draft Local Plan only allocated this site for 50 homes. The applicant is proposing 68 - a 36% increase with no justification. If this site were ever considered appropriate (which I dispute), 68 homes would represent clear overdevelopment.

CONCLUSION

I recognise Horsham faces pressure to deliver housing, and I'm not opposed to all development. Our community accepted growth through the Neighbourhood Plan process and identified sites where it could be accommodated sustainably. This isn't one of them.

The application should be refused because:

1. Housing Officers don't support it - Wrong mix; deliverability concerns; doesn't meet identified need
2. Neighbourhood Plan conflict - Site not allocated; NPPF paragraph 14 protection applies
3. Policy conflict - Applicant concedes conflict with HDPF policies 2, 3, 4 and 26
4. Sewage capacity unknown - 43 overflow events / 411 hours in 2022; downstream capacity not assessed
5. Electricity constraints - No grid assessment despite all-electric heating
6. Transport - Unrealistic modal shift; only 2 buses on Wednesdays; cumulative impact not assessed
7. Ancient woodland - Footpath through buffer contradicts Standing Advice; deterioration inevitable
8. Air quality errors - Assessment contains inaccurate figures requiring correction
9. Cumulative impact - Village has already absorbed significant growth
10. Character - Loss of "important green gap"; harm to heritage assets

The tilted balance, even if engaged, does not override these constraints. The adverse impacts

clearly and demonstrably outweigh the benefits.

Yours faithfully,

[Redacted Signature]

Kind regards

Telephone:

Email: planning@horsham.gov.uk



**Horsham
District
Council**



Horsham District Council, Albery House, Springfield Road, Horsham, West Sussex RH12 2GB

Telephone: 01403 215100 (calls may be recorded) www.horsham.gov.uk Chief Executive: Jane Eaton