



SOUTHWATER PARISH COUNCIL

Beeson House, 26 Lintot Square,
Fairbank Road, Southwater,
West Sussex RH13 9LA

Horsham District Council,
Parkside,
Chart Way,
Horsham,
West Sussex,
RH12 1RL

21 March 2025

Dear Sir or Madam,

DC/25/0102: Outline Application with all matters reserved except for access for up to 82 dwellings with vehicular and pedestrian access, public open space, noise mitigation measures, landscaping, foul and surface water drainage and associated works.

Southwater Parish Council formally objects to Planning Application DC/25/0102, submitted by Miller Homes Ltd for up to 82 dwellings at Land at Campsfield, Southwater.

Despite the application being outline with all matters reserved, the proposed development raises significant concerns regarding its impact on local infrastructure, traffic, residential amenities, and access constraints. This objection is based on key policies within the Development Plan for the area, which includes the **Horsham District Planning Framework (HDPF)** and the **Southwater Neighbourhood Plan (SNP)**.

The access for the site lies on the boundary of the designated Southwater Neighbourhood Plan Area and so the scheme will impact on the Plan Area. The SNP should therefore hold some weight in the determination of this application and so we refer to policies in the SNP and the HDPF throughout this representation.

1. Missing Information

Before discussing the material considerations, we note that Horsham District Council's Local Validation List states that a Water Neutrality Statement should '*include how they [the applicant] intend to achieve water neutrality, for example, water efficiency measures and providing offsetting measures to reduce water consumption from existing development*'.

The applicant hasn't submitted a Water Neutrality Statement, prepared by a qualified expert, instead they have stated in the Planning Statement that bore holes will be used to provide potable water to new homes and measures will be implemented within homes to reduce water usage. It states that if needs be a condition can be attached to the permission to ensure that water neutrality is achieved prior to occupation.

In our opinion, the applicant has not provided sufficient information to assure us that water neutrality can be achieved through an appropriate solution. No reference is made to the SNOWS scheme and no calculations have been provided to determine what the proposed water usage across the site may be. Water neutrality is so integral to larger development proposals that the local planning authority must be

certain that water neutrality can be achieved before applying conditions. We therefore ask that Horsham District Council request a full statement from the applicant.

2. Impact on Highway Safety and Traffic Congestion

The proposal conflicts with **HDPF Policy 40 (Sustainable Transport)** and **Policy SNP4 (Keeping Our Roads Moving)**, which require new developments to ensure safe and sustainable transport solutions while mitigating traffic congestion. The sole access route through the **Mulberry Fields Development** will create excessive traffic pressure, adversely affecting existing residents. Additionally, the Transport Assessment fails to adequately demonstrate that this proposal will not result in severe congestion or safety hazards at key junctions, particularly the already stressed **Hop Oast Roundabout and A24 intersections**.

Furthermore, **Policy SNP4.1** states that major developments must not cause severe or unacceptable safety impacts on the local road network. The absence of a secondary access road exacerbates concerns, especially during construction and for emergency vehicle access.

3. Adverse Impact on Residential Amenity

The proposal does not comply with **HDPF Policy 33 (Development Principles)**, which requires developments to respect local character, amenity, and quality of life. Construction traffic through Mulberry Fields would significantly disrupt residents, increasing noise, dust, and safety risks for pedestrians and cyclists. **SNP16 (Design)** and **SNP4.3 (Traffic Calming Measures)** require appropriate design solutions to mitigate such issues, which the application fails to provide.

4. Inadequate Parking and Accessibility

HDPF Policy 41 (Parking) require new developments to provide sufficient parking to avoid increased reliance on on-street parking. The submitted plans lack clarity on visitor parking provision, raising concerns that the development will create overflow parking issues in surrounding areas.

5. Environmental and Infrastructure Concerns

The proposed development does not align with **HDPF Policy 25 (Natural Environment and Landscape Character)**, which seeks to protect and enhance green infrastructure. The increased urbanisation of this site will result in the loss of biodiversity and natural habitat, and also fail to respect the existing character of the surrounding area thanks to the impacts of **SNP18 (A Treed Landscape)**, which prioritises the retention of and creation of green corridors and tree cover.

Moreover, **Policy 4 of the HDPF (Settlement Expansion)** states that development outside built-up boundaries should only be supported where it meets identified local needs. There is insufficient evidence that this proposal aligns with Southwater's strategic housing needs as defined in the **Southwater Neighbourhood Plan (2019-2031)**.

6. Lack of Additional Infrastructure and Services

The Southwater Neighbourhood Plan highlights the strain on local infrastructure, particularly education and healthcare facilities. **Policy SNP3 (Safeguarding of Land for Secondary School)** identifies the need for expanded school capacity. However, this application does not demonstrate how increased demand from new residents will be accommodated within local schools or medical services.

7. Housing Mix

Policy 16 of the HDPF (Meeting Local Housing Needs) requires development to provide a mix of housing sizes, types and tenures to meet the needs of the district's communities as evidenced in the latest Strategic Housing Market Assessment (SHMA).

The latest SHMA was prepared in 2019. The table below provides a comparison of the proposed housing mix against the recommendations from the SHMA.

Bedrooms	Units Provided	Percentage	SHMA Recommendation
Affordable Rent			
1	8	40	35
2	4	20	30
3	6	30	25
4	2	10	10
Affordable Ownership			
1	0	0	25
2	6	67	40
3	2	22	25
4	1	11	10
Market Housing			
1	6	11	5
2	12	22	30
3	22	41.5	40
4	13	24.5	25

Whilst we appreciate that the scheme is outline with all matters reserved except access, the proposal significantly underprovides for 1-bed and overprovides for 2-bed affordable ownership properties. It also overprovides for 1-bed and underprovides for 2-bed market houses. As it stands the housing mix is not completely in accordance with the latest SHMA and therefore the scheme fails to comply with Policy 16.

Conclusion

For the reasons outlined above, Southwater Parish Council objects to Planning Application DC/25/0102 on the basis that it conflicts with key policies in both the Horsham District Planning Framework and the Southwater Neighbourhood Plan. The lack of appropriate infrastructure, unacceptable traffic implications, harm to residential amenity, environmental and housing mix concerns render this development unsuitable. Moreover, the applicant has not provided sufficient information regarding water neutrality. We urge

Horsham District Council to **refuse this application** unless substantial amendments are made to mitigate these issues.

We appreciate your consideration of this objection and would welcome further discussion on ensuring development proposals align with Southwater's planning policies and community needs.

Yours faithfully,



Justin Tyler

Executive Officer & RFO