

From: Planning@horsham.gov.uk
Sent: 16 August 2026 11:40
To: Planning
Subject: Comments for Planning Application DC/26/0366
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 16/08/2026 11:39 AM [REDACTED].

Application Summary

Address: Land North West of Southwater

Proposal: Outline planning application, with all matters reserved (except for primary access to the highway) for a phased development comprising: the demolition of existing buildings and the construction of up to 1,000 residential dwellings (including affordable housing) (Use Class C3); up to 80 specialist accommodation units (Use Class C2); a mixed-use neighbourhood centre (Use Classes E and F); education facilities (Use Class F1(a)); business and employment floorspace (Use Classes B2, B8 and E(g)); redevelopment of existing agricultural buildings including construction of a building for community use (Use Classes E and F2); improvements to public rights of way; sports pitches; gypsy and traveller pitches/plots; public open space; landscaping, and associated infrastructure

Case Officer: Matthew Porter

[Click for further information](#)

Customer Details

Name: [REDACTED]

Email: [REDACTED]

Address: 7 Courtlands Southwater Horsham West Sussex

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment: - Overdevelopment

Comments: Re: OBJECTION TO PLANNING APPLICATION DC/26/0366 - Barns Green Water Treatment Works - Over Capacity Issues

Dear Sir/Madam,

I am writing to formally object to planning application DC/26/0366 (Land Northwest of Southwater, Berkeley Homes). This objection is made principally on foul drainage and wastewater treatment capacity grounds relating to Barns Green Wastewater Treatment Works (WwTW), which the application proposes to use to serve a development of the order of 1,000 households. On the evidence set out below, the application fails to demonstrate that adequate wastewater infrastructure exists, or will exist within any defined and reliable timeframe, to serve this scale of development without unacceptable and worsening environmental harm.

1. A directly comparable application has already shown that Barns Green WwTW lacks confirmed capacity

The Council has already had cause to consider, in the context of application DC/25/2057 (Land to the North of Little Slaughterford, Miller Homes - 68 dwellings), whether Barns Green WwTW has spare capacity to accept additional flows. In correspondence with the Council's case officer, Southern Water stated on 22 July 2026:

"We are currently investigating this matter, and, at this stage, we are unable to confirm with confidence whether there is sufficient capacity at Barns Green WTW. The site is undergoing a detailed review, which remains ongoing."

Southern Water was unable, across more than five weeks of correspondence between June and July 2026, to confirm a position on capacity for an application of just 68 dwellings. Objectors to that application calculated, using Southern Water's own figures, that existing committed flows - from the Sumners Field and Oakland Park developments and Sumners Ponds - already total approximately 1,615 population equivalent, against a works Southern Water itself states was designed for a population of only 1,018 and could, at most, be stretched to serve "roughly 1,400" (Southern Water, response to Environmental Information Request, 9 April 2025). The current consented Dry Weather Flow limit for the works is 227 m³/day.

DC/26/0366 proposes routing wastewater from a development of the order of 1,000 households to the same works. On Southern Water's own evidence, a works already under review for its ability to serve an additional 68 dwellings cannot credibly be relied upon to accommodate a burden of this scale.

2. The application compounds an existing shortfall with a further transfer from Itchingfield Southern Water has separately indicated an intention to decommission Itchingfield Treatment Works and transfer its flows - of the order of 14,000 litres per day - into Barns Green WwTW. This would add further load to a works that, on Southern Water's own admission, is already under detailed review for capacity reasons, before DC/26/0366 is even taken into account. I am not aware of any single, consolidated assessment published by Southern Water or the applicant that considers the cumulative effect of (a) existing committed development, (b) the Itchingfield transfer, and (c) the flows proposed under this application.

3. The applicant's own drainage evidence does not commit to a firm, binding delivery timetable

The applicant's Environmental Statement (Volume II, Appendix 13.1 - Flood Risk Assessment and Outline Drainage Strategy), Annex H, incorporates a Southern Water letter (reference DSA000012586, dated 12 July 2022) stating that Barns Green WwTW is "the nearest point where capacity is currently available for reception of flows from the proposed development." That letter is now over four years old and predates the capacity concerns subsequently raised in relation to DC/25/2057. [NOTE FOR SUBMISSION: if Annex H specifies that any required infrastructure works would only be delivered within two years following grant of planning permission, that provision should be quoted directly here and the Committee should be asked to treat it as a binding pre-occupation condition, not an aspiration - please confirm the exact wording before this letter is sent.]

Even where a developer offers to fund upgrades, delivery is not within the developer's control: it depends on Southern Water's own investment planning, land assembly, environmental permitting and construction programme. Given Southern Water's demonstrated recent inability even to confirm current capacity for a much smaller scheme, the Committee should not accept a future assurance of capacity as a substitute for evidence that the necessary infrastructure is either already in place, or is contractually and

financially secured with a binding delivery date enforceable by planning condition or Section 106 obligation, such that no dwelling is occupied ahead of confirmed treatment capacity.

4. Barns Green WwTW is already causing significant, worsening environmental harm Environment Agency Event Duration Monitoring data show a sustained pattern of storm overflow spills from Barns Green WwTW into Parsons Brook, a tributary of the River Adur (Adur West Water Body, already assessed as being of poor ecological status):

Year Recorded spills Duration (hours) Source

2021 40 252 Southern Water data cited in planning application DC/22/1916

2022 43 410.85 Southern Water data cited in planning application DC/22/1916

2023 63 569.17 Environment Agency EDM Annual Return

2024 60 502.23 Environment Agency EDM Annual Return

2025 47 417 Environment Agency EDM Annual Return (2025)

Between 2021 and 2025, recorded spill hours from this works increased by approximately 65%, and the number of spill events by around 17.5%, notwithstanding a partial improvement in the most recent year. These are the legally permitted, monitored storm discharges. Separately, and of greater concern, local residents have documented repeated, unrecorded and unpermitted discharges of raw, unscreened sewage from a manhole immediately upstream of the works' raw sewage lift pumping station, directly into Parsons Brook, arising from pump blockages, mechanical and electrical failures - including an incident recorded on 5 January 2024 (see attached photographic evidence, "Images of Some Typical and Frequent Pollution Incidents at the Barns Green Sewage Treatment Plant"). Residents report that even once Southern Water has been alerted to these failures, it can take several days for the company to respond.

These incidents demonstrate that the existing works is not merely at or near capacity, but is already operating in a manner that causes ongoing, and in part undocumented, environmental harm. Adding load from a further c. 1,000 households, on top of existing committed development and the proposed Itchingfield transfer, can only be expected to increase both the frequency and the severity of these events.

5. Southern Water's wider regulatory record gives no confidence that this will be resolved through normal investment planning

This is not an isolated, local operational issue. Ofwat's own annual performance reporting has placed Southern Water in its "lagging behind" performance category - the worst classification available - in every year of the current 2020-2025 price control period. The Environment Agency's Environmental Performance Assessment rated Southern Water at just 2 stars ("requires improvement") for 2024, following a 1-star rating in 2021, and the company was fined a record £90 million in 2021, and a further £7.1 million in 2026, for illegal sewage discharges elsewhere in its region. Against this sustained regulatory track record, the Committee should treat with real caution any assurance from Southern Water that capacity constraints at Barns Green will be resolved in step with new development, in the absence of binding, dated delivery commitments.

6. National planning policy is explicit that infrastructure must come first

On 25 June, the then Secretary of State for Housing, Steve Reed, stated publicly that "the homes won't be built if the water infrastructure isn't there," clarifying that this principle extends to "roads, electricity supply, other forms of energy coming into the area as well." This "infrastructure first" position reflects the basic tenet of sustainable development that new housing should only be permitted where necessary infrastructure is demonstrably in place, or reliably secured to be delivered in step with the development - not left to a subsequent, unfunded and undated review process, as is currently the case at Barns Green.

7. Conclusion and request

On the evidence currently available - including Southern Water's own recent correspondence with this Council - there is no reliable basis on which the Committee can be satisfied that adequate wastewater treatment capacity exists, or will exist in time, to serve DC/26/0366 without further, worsening environmental harm to Parsons Brook and the River Adur, and without materially worsening the living environment already experienced by residents of Barns Green. This represents a failure of the sustainability test that this application must meet.

I therefore request that the Committee refuse DC/26/0366, and that any reconsideration of

a future application be deferred until Southern Water has:

- published a consolidated, up-to-date assessment of total committed and proposed foul flows to Barns Green WwTW, including existing connections, the proposed Itchingfield transfer, and this application;
- confirmed, in writing and without qualification, that the works has sufficient consented capacity to accept those flows; and
- where works are required, secured a binding delivery date for that infrastructure, enforceable by planning condition or a Grampian-style Section 106 obligation, such that no dwelling may be occupied ahead of confirmed treatment capacity being in place.

I would be grateful if this letter, and its contents, could be placed before the Planning Committee and taken into account in full when this application is determined.

Yours faithfully,

[REDACTED]

On behalf of Save Rural Southwater

7 Courtlands, Southwater, Horsham, West Sussex RH13 9AD

[REDACTED]

Where did you
hear about this
application?

Public Access

Kind regards

Telephone:

Email: planning@horsham.gov.uk



**Horsham
District
Council**



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

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