
From: Planning@horsham.gov.uk
Sent: 08 April 2026 14:15
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 08/04/2026 2:14 PM.

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

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Customer Details

Address: 1 Fir Villas Southwater Street, Southwater, Nr Horsham

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment:

- Design
- Highway Access and Parking
- Loss of General Amenity
- Other
- Overdevelopment
- Trees and Landscaping

Comments: I am objecting to the Berkeley Homes proposal to build 1,000 homes on farmland northwest of Southwater. In a democratic referendum, Southwater residents voted in June 2021 to approve a Neighbourhood Plan that set a clear and legally binding limit on new housing in the village - between 420 and 460 homes. This was agreed through a proper community-led process. No material planning evidence has been put forward by Berkeley Homes or Horsham District

Council to justify why the community's own plan should be overridden and clearly does not satisfy the social and housing needs of the local community.

Berkeley Homes proposal is not a slight overshoot but a 117% breach of the limit set by residents.

There is no planning principle that requires a single village to absorb this level of growth. Housing need exists across Horsham District and should be distributed across many locations - not concentrated on a village that has already done more than its fair share.

Furthermore, Berkeley Homes proposal will erode the physical separation between Southwater and Christ's Hospital, which the Neighbourhood Plan specifically requires to be maintained.

The cumulative loss of separation has never been honestly addressed in any planning document submitted by Berkeley Homes.

National planning rules state clearly that where a proposal conflicts with the current and in-date Neighbourhood Plan, planning permission should not normally be granted. Our Neighbourhood Plan is recent, legally adopted, and carries full weight.

The Southwater Neighbourhood Plan's specific and clear policy stated that Southwater must remain a single-centre village, with its shops, services and facilities focused around Lintot Square. This core planning principle was voted for by residents.

Berkeley Homes' proposal includes a large new cluster of shops, community facilities, a primary school and other services - effectively creating a second village centre. This would change the fundamental character of Southwater.

A previous Berkeley Homes application for 1,500 homes on the same site (reference DC/22/1916) was withdrawn in February 2023 after HDC planning officers concluded it was unacceptable. These fundamental concerns have simply been repackaged.

The visual impact on the surrounding landscape has not been honestly or properly assessed. Southwater sits on a gently elevated, open plateau. Unlike settlements protected by valleys or woodland, the quality of Southwater's setting is defined by its wide, open views across the Low Weald countryside. This is one of the things that makes living here distinctive - the sense of being in a village in open countryside rather than in continuous suburban sprawl.

Building 1,000 homes along the western edge of the village will fundamentally alter what is visible from the surrounding countryside. A continuous line of rooftops, streets and buildings extending across the current farmland will be visible for considerable distances - changing the character of the landscape irreversibly.

There is an added cumulative dimension. The Golf Club site to the north and Broadacres to the east are both adding hundreds of homes to Southwater's edges at the same time. No Landscape and Visual Impact Assessment has been done that looks at all three developments together and honestly assesses what Southwater will look like from the surrounding countryside when they are all complete.

Since 2024 all major planning applications must achieve a minimum 10% net gain in biodiversity as a legal condition of planning permission. Before permission is granted, Berkeley Homes must demonstrate that biodiversity will measurably increase because of this development.

On a Weald Clay site, achieving meaningful biodiversity gain is particularly difficult. The ground conditions that cause drainage problems also limit the types of habitats that can be successfully created. Furthermore, the land taken up by attenuation ponds and drainage infrastructure reduces the space available for genuine habitat.

There is a serious risk that Berkeley Homes will seek to meet the 10% requirement by purchasing 'biodiversity credits' relating to habitat improvements somewhere entirely different - potentially far from Southwater. This would mean the local area around the development ends up as an ecological desert, while the paperwork shows a net gain on a distant field.

Southwater residents deserve to know whether the biodiversity gain required by law will be delivered in or near the development, where people living there can see and benefit from it.

Additionally, the site cannot be safely drained because it sits on Weald Clay - a soil type officially classified by the Environment Agency as having almost no ability to absorb water. This fundamental hydrological characteristic of this land is not a marginal issue that can be engineered away.

Planning rules require drainage systems to cope with a 40% increase in rainfall intensity to account for climate change. The 2025 drought demonstrates this is not a theoretical risk.

Berkeley Homes has not provided an independently verified drainage strategy that proves this is achievable.

I am also objecting on the basis that the drainage works required could permanently damage two areas of ancient woodland.

Courtland Wood and Smith's Copse which lie alongside the proposed development site. Both

habitats have been continuously wooded for over 400 years and are considered irreplaceable under national planning law.

The threat here is not just from bulldozers entering the woodland directly but also from large-scale drainage engineering on Weald Clay which can lower or alter groundwater levels across a wide surrounding area.

Ancient woodland trees have root systems extending far beyond the woodland boundary, and changes to soil moisture caused by attenuation ponds and drainage channels nearby can kill these trees silently over years, without direct physical contact.

This is a well-evidenced risk - yet Berkeley Homes has not submitted any independent hydrological assessment of the impact their drainage works would have on these woodlands.

The development will also increase surface water flooding. Local streams and drainage channels in this area already overflow during heavy rain. The 141-hectare site is currently farmland. Farmland, even on clay, slows the movement of rainwater into local streams and ditches. Once it is replaced with 1,000 homes' worth of roofs, roads, driveways, pavements and car parks, the volume of rainwater running off the site into local watercourses will increase dramatically - and it will arrive faster.

The UK's flood insurance safety-net: Flood Re, backed by the government and the insurance industry. The Association of British Insurers (ABI) has one absolute rule: Flood Re does not cover any home built after 1 January 2009. Every single Berkeley Homes property on this site would be excluded from this protection from day one - permanently.

Without Flood Re, a home on flood-risk land faces sky-high insurance premiums or no insurance. Without insurance, mortgage lenders will refuse to lend. Nationwide Building Society has publicly stopped offering mortgages on properties it considers high flood risk. HSBC has warned that properties 'are likely to become uninsurable' when Flood Re closes in 2039. The Bank of England cautions that an uninsurable home loses value substantially - because banks use insured property as collateral, and without cover that collateral is worthless.

Furthermore, Weald Clay creates serious structural risks to buildings through a process called shrink-swell subsidence and heave, compounding the insurance and mortgage problems described above.

This specific site has a risk which is compounded by the immediate proximity of Courtland Wood and Smith's Copse. Tree roots extending well beyond the woodland boundary extract moisture, intensifying the shrinkage that damages foundations. Ancient woodland trees cannot simply be pruned to reduce this and severe pruning risks killing trees that are legally irreplaceable.

Wildlife impact surveys are incomplete, and Berkeley Homes is seeking to carry them out after approval rather than before - which is not permitted.

There is established evidence of [REDACTED] wildlife using foraging routes across this land that have existed for generations.

Berkeley Homes has argued that full surveys should wait until after the allocation is confirmed. This approach is legally improper and should be rejected. It is designed to avoid scrutiny at the stage when it is most meaningful. The scale of wildlife using this land [REDACTED]

[REDACTED] has not been assessed in any rigorous, independent way. This is a significant and unresolved gap in the evidence base.

Southwater lacks the infrastructure for building on this magnitude and this planning application needs to take account of the fact that Southwater is not starting from zero. Approximately 350 homes are already under construction at Broadacres. Around 800 more have planning permission at the Horsham Golf Club site. Around 1,150 new homes committed before Berkeley Homes has built a single house. Adding 1,000 more brings the total to over 2,150 new homes - more than doubling the number of households in a village whose roads, schools, doctors' surgeries and sewage system were not built to cope with growth at this scale.

NHS and healthcare infrastructure is already overwhelmed, and no plan exists to expand it. Approving 1,000 more homes does nothing to solve a staffing crisis that the NHS itself has not been able to resolve. Access to NHS dentistry in the area is also severely constrained, with many residents unable to register with an NHS dentist.

Southwater is also geographically isolated from the main hospitals. As a result, ambulance response times for our area are among the worst in the whole of Sussex. Adding over 2,000 more homes will put even greater pressure on emergency response capacity.

The sewage and wastewater system is already failing residents and Southern Water cannot be trusted to fix it. Some Southwater Parish Council residents have been dealing with sewage overflow problems that Southern Water has repeatedly failed to resolve. Adding 1,000 more

homes to an already strained network is irresponsible.

Planning application DC/26/0366 reveals that foul sewage from the proposed development will be treated at Barns Green Wastewater Treatment Works. Southern Water's documents (Flood Risk Assessment and Outline Drainage Strategy, 27/02/2026, para. 11.1.3; Annex H) confirm that intended increased capacity at Barns Green will take at least 24 months - potentially longer. Approving development would place the Barns Green works under severe additional load before any upgrade is in place, with a real and predictable risk of sewage discharging into local watercourses. Planning permission must not be granted on the assumption that a company actively resisting investment will deliver the infrastructure needed.

Water scarcity is a real, unresolved infrastructure constraint - and removal of the formal water neutrality planning condition has not changed the physical facts.

In October 2025, HDC announced the 'water neutrality' requirement had been lifted. This has been used to suggest the water supply problem is solved. It is not.

The 2025 drought was the worst in over 130 years. Hosepipe bans were imposed. The Environment Agency confirmed England needed a full winter of above-average rainfall to recover. This did not materialise. England faces a projected water deficit of nearly 5 billion litres per day by 2050, with Sussex among the worst-affected regions.

There is direct local evidence that water supply for Southwater is already under strain.

Residents on the recently built Broadacres estate - a development on the same side of the village - have had to remove water-saving flow restrictors from their taps and showers because water pressure or volume was below their basic daily needs. This is happening before 1,000 more homes are added.

Additionally, HDCs water demand monitoring is misaligned with Southern Water's published consumption figures by 21%. Therefore official planning calculations used to argue that water supply is adequate are unreliable.

Berkeley Homes' own application contains no credible water supply strategy. There is no assessment of cumulative demand from the 1,150 homes already committed in Southwater alongside the 1,000 proposed. There is no independently verified analysis of whether Southern Water's network - already under stress in dry years - has the headroom to serve this additional population. There is no contingency for the worsening drought conditions that the Environment Agency has already identified as a structural trend. The application simply assumes that water will be available. That assumption is not evidence, and in a formally designated water-stressed area it is not an acceptable basis for granting planning permission.

A development of 1,000 homes is not a modest expansion. Combined with the 800 homes already approved at the Golf Club site and 350 at Broadacres, Southwater would be adding more than 2,000 homes in a single generation. That transforms a large village into a small town - irreversibly. The scale of this proposed development vastly exceeds anything Southwater was designed to absorb. It is not an extension of an existing settlement; it is being dumped on top of one.

No combined landscape assessment has been carried out looking at the Berkeley Homes proposal alongside the Golf Club site and Broadacres development together. The cumulative visual impact on Southwater - and on the risk of coalescence with neighbouring settlements - has never been honestly assessed.

The local road network is already at breaking point and this development will make it far worse. The A24, which is the only realistic route in and out of Southwater for most journeys, is already at or beyond capacity at peak times - confirmed in HDCs evidence base. The Hop Oast roundabout, the main access point for the Berkeley Homes development, is already at capacity according to the Council's own figures - and this is before a single Berkeley Homes home is built. Adding 1,000 new homes, alongside the 800 already approved at Horsham Golf Club's site, would bring 1,800 new car-dependent households through this single junction.

Southwater has no railway station. Christ's Hospital station - the nearest - is remote from the village, served by infrequent and slow trains and has no meaningful car parking. The bus service is sparse and does not serve newer housing estates. There is no viable cycling or walking route across the A24 dual carriageway or the railway line that separates Southwater from Horsham town centre and the district's main employment areas.

The result is that every Southwater resident already needs a car for virtually every significant journey. Berkeley Homes' proposal includes aspirational commitments to bus services and cycle routes - but these are not funded, not contracted, and not enforceable. Aspirations are not infrastructure.

Berkeley Homes' transport assessment claims the new secondary school would generate very little additional traffic - arguing that most pupils will walk or cycle. This conclusion is not credible.

A new secondary school south of Horsham would attract pupils from across a wide area, including from the 800 homes already approved at the Horsham Golf Club site. However, the A24 dual carriageway lies between the Golf Club development and the proposed school. The A24 is a highspeed, high-volume trunk road. There is no safe pedestrian or cycle crossing at a suitable point for school-age children. The only adequate solution is a grade-separated crossing - either an underpass or a footbridge.

This is expensive infrastructure that Berkeley Homes has not committed to fund, design or deliver.

The gap between local wages and local house prices is so wide that the standard definition of 'affordable housing' is essentially meaningless in this part of West Sussex. HDCs policy requires 40% of homes in major developments to be genuinely affordable - 70% as affordable rent and 30% as shared ownership. Berkeley Homes must demonstrate, with independent evidence, that it will deliver this in a form that local people can genuinely access. Crucially, Berkeley Homes has not demonstrated that any registered provider has committed to taking on the affordable housing element of this development. Without that commitment, the affordable housing offer is unverified and cannot be relied upon.

Where housing is intended to accommodate residents displaced from other municipalities, it is essential that those homes are in places with good access to employment, schools, services and public transport. Southwater currently lacks all of these at the scale this development would demand. Placing displaced residents in a location where they cannot access work, education or services without a car does not constitute a housing solution - it creates a dormitory settlement.

HDCs policy requires 40% affordable homes on major developments. But developers are allowed to submit a 'viability assessment' - a financial model claiming the development is not profitable enough to deliver 40% - and negotiate the obligation down.

These viability assessments are almost always prepared by consultants appointed and paid by the developer. The figures they contain - including land costs, construction costs and profit margins - are controlled by the developer. This creates a system in which the developer effectively marks its own homework on what it can afford to provide.

It is also notable that Berkeley Homes has previously marketed properties in Southwater to overseas investors. This raises a legitimate question about whether meeting local housing need is genuinely the purpose of this scheme, or whether it is primarily a commercial proposition for an investor market.

Planning rules require that housing development addresses real, locally identified need - not simply that it adds to a district-wide number. The question is not 'does Horsham District need housing?' - of course it does. The question is: 'is there genuine evidence that Southwater specifically needs 1,000 more homes, over and above the 1,150 already committed?' The honest answer is no. Much of the housing pressure in this part of West Sussex originates from Gatwick Airport's workforce, Crawley reaching its boundaries, and coastal towns to the south. These are pressures generated elsewhere and should be addressed near where they arise - not transferred to a village with limited employment of its own.

Brownfield land elsewhere in Horsham District should be developed before more farmland in Southwater is built on. The principle that brownfield land - previously developed sites - should be built on before greenfield farmland is a core planning principle. It protects the countryside, reduces the infrastructure cost of new development, and puts homes closer to existing services and employment.

The former Novartis pharmaceutical factory site in North Horsham is a ready example. It already has planning permission for 244 affordable homes, granted in October 2025. It is closer to Horsham town centre, rail services, and the district's main employment areas. It requires no new road infrastructure to be genuinely sustainable. West Sussex County Council is currently investing in bus and cycling improvements along the A264, A281 and Horsham-Crawley-Gatwick corridor. These investments make development along those corridors genuinely sustainable. None of this investment reaches Southwater.

Horsham District Council's own December 2024 Brownfield Register makes the position plain. Across the entire district, HDC has identified just 18 brownfield sites with a combined capacity of approximately 827 dwellings, covering around 20.98 hectares. That total includes sites already under construction, sites with lapsed permissions, and sites that have been in the pipeline for years without progressing. The largest single site - the former Novartis site in North Horsham, with permission for 300 dwellings - remains unbuilt. Several other sites with permissions granted as far back as 2014 have still not been implemented.

Berkeley Homes is seeking permission for 1,000 homes on a single greenfield site. That is more homes than the entire brownfield land supply HDC has been able to identify across the

whole district. Before approving the destruction of 141 hectares of open farmland at Southwater, the Council must demonstrate that its brownfield pipeline has been fully explored, actively promoted, and genuinely exhausted. There is no evidence that this has been done.

Kind regards

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