



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

Your ref
DC/25/2057

Our ref
DSA000050301

Date
22nd January 2026

Contact
Tel 0330 303 0119

Dear Sir/Madam,

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.

Site: Land North of Little Slaughterford, Chapel Road, Barns Green, West Sussex, RH13 0PR.

Thank you for your correspondence. Please see our comments below regarding the above planning consultation application.

Sufficient capacity – Foul

There is currently adequate capacity in the local sewerage network to accommodate a foul flow of 0.6 l/s for the above development at manhole reference TQ12265901. Please note that no surface water flows (existing or proposed) can be accommodated within the existing foul sewerage system unless agreed by the Lead Local Flood Authority in consultation with Southern Water, after the hierarchy Part H3 of Building Regulations has been complied with.

Connection to water distribution main

Our investigations indicate that Southern Water can facilitate water supply to service the proposed development. Southern Water requires a formal application for a connection to the water supply to be made by the applicant or developer.

To make an application visit Southern Water's Get Connected service:

<https://developerservices.southernwater.co.uk> and please read our New Connections Charging Arrangements documents which are available to read on our website via the following link www.southernwater.co.uk/developing-building/connection-charging-arrangements

Tree planting

We have restrictions on the proposed tree planting adjacent to Southern Water sewers, rising mains or water mains. Reference should be made to Southern Water's publication "A Guide to Tree Planting near water Mains and Sewers" (https://www.southernwater.co.uk/media/pddob0vn/ds-tree-planting-guide-1_nwm.pdf) and the Sewerage Sector Guidance (<https://www.water.org.uk/sewerage-sector-guidance-approved-documents/>) with regards to any landscaping proposals and our restrictions and maintenance of tree planting adjacent to sewers, rising mains and water mains.

Condition

In order to protect public apparatus, Southern Water requests that if consent is granted, the following pre commencement condition is attached to the planning permission; The developer must advise the local authority (in consultation with Southern Water) of the landscaping proposals in proximity of public apparatus in order to protect it in accordance with Southern Water's guidance, prior to the commencement of the development.

Proposed SUDS features

If it is the intention of the developer for Southern Water to adopt the proposed SuDS, the system shall be designed and constructed in line with the Design and Construction Guidance www.water.org.uk/sewerage-sector-guidance-approved-documents/.

No Soakaways should be connected to the public surface water sewer.

The supporting documents make reference to drainage using Sustainable Drainage Systems (SuDS). Where SuDS form part of a continuous sewer system, and are not an isolated end of pipe SuDS component, adoption of SuDS will be considered if requested by the developer if they comply with: Design and Construction Guidance (Appendix C), CIRIA guidance and Southern Water SuDS Guidance available here:

<https://www.water.org.uk/sewerage-sector-guidance-approved-documents/>

<https://www.ciria.org/ItemDetail?iProductCode=C753F&Category=FREEPUBS>

<https://www.southernwater.co.uk/media/l4ndl3db/suds-final-080824.pdf>

Where SuDS rely upon facilities which are not adoptable by sewerage undertakers the applicant will need to ensure that arrangements exist for the long-term maintenance of the SuDS facilities. It is critical that the effectiveness of these systems is maintained in perpetuity. Good management will avoid flooding from the proposed surface water system, which may result in the inundation of the foul sewerage system.

Thus, where a SuDS scheme is to be implemented, the drainage details submitted to the Local Planning Authority should:

- Specify the responsibilities of each party for the implementation of the SuDS scheme.
- Specify a timetable for implementation.
- Provide a management and maintenance plan for the lifetime of the development.

This should include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime.



This initial assessment does not prejudice any future assessment or commit to any adoption agreements under Section 104 of the Water Industry Act 1991.

S106 Connection application

Any new connections to the public sewerage system will require a Section 106 connection application to be submitted and approved by Southern Water Services.

To make an application visit Southern Water's Get Connected service:

<https://developerservices.southernwater.co.uk> and please read our New Connections Charging Arrangements documents which are available on our website via the following link:

<https://www.southernwater.co.uk/developing-building/connection-charging-arrangements>

Please note that, where there are separate systems available, Southern Water will not allow surface water to connect into the public foul sewer. If this is not possible, please provide evidence that all other options have been explored.

For further advice, please contact Southern Water, Southern House, Yeoman Road, Worthing, West Sussex, BN13 3NX (Tel: 0330 303 0119).

Website: southernwater.co.uk or by email at: SouthernWaterPlanning@southernwater.co.uk

Yours faithfully,

Future Growth Planning Team

southernwater.co.uk/developing-building/planning-your-development



Date

11th March 2026

Contact

Tel 0330 303 0368

Dear Ms Johnson

**The Environmental Information Regulations 2004
Request for Information
EIR reference 4275**

Thank you for your request for information which we received on 11th February 2026. We have dealt with your request under The Environmental Information Regulations 2004 (EIR 2004). This letter provides the response to your request, as follows: A complete copy of your original request is provided in Appendix A.

Re: DC/25/2057, Land North of Little Slaughterford

We can confirm that Southern Water does hold this type of information you have requested.

Your letter contains some requests which comprise requests for information under the EIR 2004. We have responded below to the points in your letter that comprise requests for environmental information.

Would the existing treatment plant perform adequately and meet all the required EA treated effluent quality consents if the Dry Weather Flow (DWF) was in excess of 291,000 litres per day?

Based on the available historical data for Barns Green Wastewater Treatment Works (WwTW), the average Dry Weather Flow (DWF) is 146,000 litres/day (l/d) and has not exceeded 291,000 l/d. Therefore, we don't have available historical effluent data for DWF values within this higher range. The modelled results indicate that, under current site conditions and the existing permit, there will be an approximate 10% shortfall in primary and secondary treatment capacity if the DWF exceeds 291,000 l/d. Compliance with the Environment Agency (EA) discharge permit limits will depend on operational performance, weather conditions, and actual influent loading at the time.

Would the existing treatment plant perform adequately and meet all the required EA treated effluent quality consents if the population being served was in excess of 1,630?

This catchment is currently serving a total population equivalent (PE) of 1,210. Historically, the population served has not exceeded 1,630 PE. The modelled results indicate that, under current site conditions and the existing permit, there would be adequate treatment capacity if the population



served were to exceed 1,630 PE. Compliance with the EA discharge permit limits will depend on operational performance, weather conditions, and actual influent loading at the time.

If the potential Dry Weather Flow (DWF) is in excess of the current EA consented DWF of 227,000 litres a day into Parsons Brook, how likely is it that the EA would actually grant an increase to the consented daily discharge volume in view of the current well-documented 'poor ecological health' of the receiving waters?

Available water quality data for Parsons Brook is aggregated at the wider Adur West waterbody level (Waterbody ID GB107041012290), and no assessment specific to Parsons Brook currently exists: [Adur West | Catchment Data Explorer](#) | [Catchment Data Explorer](#)

The most recent "Reasons for Not Attaining Good" (RNAG) data, from 2022, does not attribute reasons for failure to any individual WwTWs. Four WwTWs, Itchingfield, Barns Green, Coolham and Shipley discharge into this catchment.

Of the 13 RNAGs listed for the waterbody, four relate to continuous wastewater discharges; however, only one (phosphate) is confirmed. The remaining indicators (dissolved oxygen, fish, and macrophytes/phytobenthos) are classified as probable. Other sectors, including agriculture, also contribute to water quality pressures.

Barns Green is a relatively small site and will be operating to the most stringent phosphorus standard achievable (0.25 mg/L) by the end of this regulatory period. Based on this context, an increase in DWF and resulting nutrient load from Barns Green is unlikely to cause a significant deterioration in overall water quality within the Adur West waterbody.

However, only the Environment Agency can assess and confirm this through its source-apportionment modelling.

We are entitled to make a reasonable charge for information provided under the Regulations. Details of our charging scheme can be found on our website: [Environmental Information Request | Southern Water](#). In this case we have decided to waive our charge.

If you are dissatisfied with the handling of your request, you have the right to ask for an internal review. Internal review requests should be submitted within forty working days of the date of receipt of this response and should be addressed to Head of Legal, Southern Water Services Ltd, Southern House, Yeoman Road, Worthing, West Sussex BN13 3NX or you can email EIR.Internal.Review@southernwater.co.uk.

If you are dissatisfied with the outcome of the internal review, you can apply, without charge, to the Information Commissioner, who will consider whether Southern Water has complied with its obligations under the Regulations, and can require Southern Water to remedy any problems. You can find out more about how to do this, and about the Regulations in general, on the Information Commissioner's website at: www.ico.org.uk. Complaints to the Information Commissioner can be made via the "report a concern" section of the Information Commissioner's website.

Please do not hesitate to contact us if you have any queries.

Yours sincerely

EIR Officer

EIR 4275 – Appendix A

Objection: Application DC/25/2057 Land North of Little Slaughterford, Chapel Road, Barns

Green, West Sussex – 68 Dwellings by Miller Homes

I object very strongly to this planning application for the following reasons below:

A - Sewage Treatment Capacity and Discharges into Parsons Brook

It is worth noting that over the past few years the storm water spills of screened but untreated sewage into the Parsons Brook from the Barns Green treatment plant have been increasing. In 2021 there were 40 spills for a total of 252 hours, in 2022 there were 43 spills for a total of 410 hours and in 2023 there were 63 spills for a total of 569 hours. The latest data from the Rivers Trust confirms that in 2024 there were 60 spills for a total of 503 hours into Parsons Brook.

Parsons Brook is a tributary of the River Adur, and the Barns Green sewage treatment plant is located within the Adur West Water Body Catchment, which already has a 'poor ecological status', apparently due in large part to pollution from sewage discharges.

It would seem that the response from Southern Water to HDC dated 22nd January 2026 is seriously flawed and needs to be challenged. For some reason it would appear that Southern Water do not have up to date knowledge of the current foul sewage connections to their sewer network and the potential flows and loads that would need to be treated by their existing sewage treatment plant. I would suggest that they have carried out a 'desktop modelling study' without the full knowledge of the situation 'on the ground' here in Barns Green.

In the Southern Water letter to HDC dated 22nd January 2026 they suggest that their sewer system could currently accept another 0.6 litres per second which equates to 51,840 litres per day of foul sewage. This is clearly not the case, and it would seem that Southern Water are unaware of the potential flows and loads into their sewer network from the following existing connection from the West side of Chapel Road and the Oakland Park development (DC/23/1235) in Emms Lane:

2• Current Sumners Field housing development - estimated final population based on 100% occupancy would be 77 persons.

- Current Bluebell Park holiday lodge development (at Sumners Ponds) – estimated population based on 90% occupancy would be 48 persons.*

- Current motorhome/caravan pitches and glamping accommodation (at Sumners Ponds) –*

estimated tourist population based on 50% occupancy would be 126 persons.

- Current Oakland Park static holiday caravan development (DC/23/1235) – estimated population based on 90% occupancy would be 84 persons. During the busy summer holiday periods if the holiday lodges and camping facilities at Sumners Ponds and the Oakland Park static holiday caravans were at 100% occupancy then this could increase the potential population served by an additional 140 persons.*

We attach a copy of our calculations (Rev F dated 29/01/26) detailing our current estimates of the potential and future foul sewage flows to be treated by the existing sewage treatment plant. We feel that our calculations may well be an underestimate as we have not fully accounted for the residential and transient flows associated with Muntham House School, the transient flows associated with the visitors to the Café on the Lake at Sumners Ponds or the staff and children at the Barns Green village school.

Even without including the proposed 68 Miller dwellings our current calculations indicate that the potential Dry Weather Flow (DWF) already exceeds the current EA consented discharge volume of 227,000 litres per day by in excess of 18%.

If the potential additional foul sewage flow from the proposed 68 Miller dwellings is then included, then our current calculations indicate that the potential Dry Weather Flow (DWF) would then exceed the current EA consented discharge volume of 227,000 litres per day by in excess of 28%.

In response to a 'Request for Information' from a Barns Green resident back in April 2025 Southern Water stated that 'Currently there are no plans to increase the capacity at the treatment works at Barns Green' in their letter (Ref: EIR 3295-1 copy attached). In this same letter they confirmed that from their perspective the current population served by the existing sewage treatment plant is 1018 but they thought it might be able support a population of 'roughly 1400 people before the dry weather flow would be over the consented limit', we suggest the current EA consented limit may already be exceeded with existing network connections without the proposed Miller development.

In our view Southern Water need to be asked by HDC to urgently confirm the following key points:

- Would the existing treatment plant perform adequately and meet all the required EA treated effluent quality consents if the Dry Weather Flow (DWF) was in excess of 291,000 litres per day?*
- Would the existing treatment plant perform adequately and meet all the required EA treated effluent quality consents if the population being served was in excess of 1630?*
- If the potential Dry Weather Flow (DWF) is in excess of the current EA consented Dry Weather Flow*

(DWF) of 227,000 litres a day into Parsons Brook, how likely is it that the EA would actually grant an increase to the consented daily discharge volume in view of the current well documented 'poor ecological health' of the receiving waters?

3 In addition to the well documented storm overflows from the Barns Green sewage treatment plant mentioned above there has been a long history of appalling pollution incidents and failures resulting on many occasions in raw unscreened and untreated sewage being discharged directly into the Parsons Brook (see attached photo sheet). It is a well-known fact that the operation, maintenance and monitoring of this particular sewage treatment plant by Southern Water leaves an awful lot to be desired.

It is also worth noting that all the foul sewage flows from Sumners Field, Sumners Ponds and the proposed Miller development would be transferred (under the railway line) to the Barns Green sewage treatment plant via the existing sewage pumping station in Smugglers Way. There have been frequent issues with this pumping station over the years associated with pump failures, blockages and electrical power failures causing flow to back up within the upstream combined sewer network.

This situation will only be exacerbated by the additional flows from the proposed Miller development.

The effective treatment of the foul sewage from any new development is a key consideration and directly impacts on the environment and in this particular case the ecological health of the Parsons Brook and the downstream River Adur West that flows through the nearby Knepp Estate.

It is strongly suggested that HDC should not bring this proposed development to the Planning Committee without further very firm assurances from Southern Water that the serious issues regarding both the capacity and the performance of the Barns Green sewage treatment plant can be fully and adequately resolved before this and any further housing developments in Barns Green are considered.

B - Traffic Generation and Parking Impact

The proposed site and its junction are positioned directly opposite the Queens Head pub and the village shop. This location is already a well-known bottleneck for traffic and the parking serving the village shop, which will be greatly impacted by the proposed development.

This is a busy road with cars, delivery lorries, tractors, motorhomes, cars with touring caravans and school buses. The proposed new development will add at least 100 private cars, plus delivery vehicles and trade vans entering and exiting the development daily.

The application includes traffic calming measures and pedestrian safety features that will create pinch points and significantly reduce on-road parking. The supporting report is also inconsistent, stating space for 10 cars in commentary but showing only 9 on the plans. This reduction will adversely affect residents, customers of the pub and the village shop and post office, and will complicate the deliveries to both businesses.

More fundamentally, NPPF paragraph 116 requires assessment of 'residual cumulative impacts' on the road network. The applicant has only modelled the site access junction, incorrectly dismissing wider impacts as 'negligible'.

This ignores the new Sumners Fields development of 32 dwellings, the visitors and tourist to the Sumners Pond development and the combined effect on the existing Chapel Road/Two Mile Ash Road junction. We feel that the cumulative traffic impact, congestion and the increased risk of accidents has been ignored and not correctly assessed. More importantly the proposed road layout with an entry road to the development opposite the village shop may cause adjacent parking concerns and have a serious detrimental impact on both the 4Queen's Head pub and the village shop and post office. Both the pub landlord and the village shop owner have advised that without on street parking their business will not be viable.

The proposed road layout for the development is likely to jeopardise the viability of the village pub, village shop and post office which are invaluable to the local community and so essential to the elderly residents due to the very limited public transport.

C - Flooding – Roadway Surface Water and Other Runoff

The applicant's planning submission claims there is no evidence of flooding in this area which is totally incorrect.

Serious flooding regularly occurs in this area after heavy rain with water flowing down the hill entering buildings including the pub and the village shop which is opposite the site. This flooding covers a wide area, even extending as far as properties in Six Acres Close.

The Flood Risk Assessment and Surface Water Drainage Statement prepared by TS Wood refers to the 'Arun and Western Stream Management Catchment' when it should refer to the 'Adur West Water Body Catchment' which then questions the whole credibility of this report.

Drainage measures proposed by the developers will not guarantee the resolution of this risk of flooding which will be exacerbated by the proposed development. With the impacts of climate change the risk of flooding will only increase.

D - Village Character, Listed Buildings and Heritage Impact

The Itchingfield 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'.

Which is precisely what this field does. It is the green buffer between the centre of the village and open countryside. A housing development in this particular field would:

- destroy this green gap entirely*
- a development of this size in this location will seriously harm the setting of the listed buildings in*

close proximity, including Blacksmiths Cottage, Bennetts, Herons Reach and the Queen's Head Pub.

- surround the charming rural village pub which is a vital community asset with housing.*

It is worth noting here that the Itchingfield and Barns Green area was designated as one of Horsham District Council's 'Landscape Character Areas' which highlights the following:

- Strong linear field and woodland pattern.*
- Strong sense of enclosure.*
- Narrow country lanes with wide grass verges.*
- Varied settlement pattern of dispersed medieval historic farmsteads/hamlets and some modern suburban development.*

5 The 'Landscape Character Assessment' also highlighted that the character and context of the Itchingfield and Barns Green area was under threat by increased suburbanisation and erosion of the historic field system.

There is no doubt that this proposed further development in this location would seriously erode the character and context of the Barns Green village setting.

I would be grateful if the full contents of this email together with the attachments could be placed before the Planning Committee.

Attachments:

Barns Green STW Calculations at Rev F dated 29/01/26.

Southern Water letter ref: EIR 3295-1 dated 09/04/25.

BG Sewage Photo Sheet.

