

From: Planning@horsham.gov.uk
Sent: 25 March 2026 19:51
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 25/03/2026 7:50 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 residential dwellings (including affordable housing) (Use Classes C2 and C3); 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

Address: 14 Crockhurst Southwater Horsham

Comments Details

Commenter Type:	Member of the Public
Stance:	Customer objects to the Planning Application
Reasons for comment:	- Overdevelopment
Comments:	I am writing as a Southwater resident to strongly object to Berkeley Homes - 1,000 Homes, Land Northwest of Southwater HDC Planning Ref: DC/26/0366. I ask that this application is refused, my objections are stated below. In brief this application conflicts with local planning policy and would cause significant, long-term harm to Southwater's environment, infrastructure, and rural identity. Objection 1: Berkeley Homes' 1,000-Home Proposal Breaks Southwater's Own Neighbourhood Plan Sub-Objection 1A: The proposal is more than double what Southwater's Neighbourhood Plan

allows

I am objecting to the Berkeley Homes proposal to build 1,000 homes on farmland northwest of Southwater. Southwater residents voted in a democratic referendum 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. That was agreed through a proper community-led process. Berkeley Homes is now proposing more than double that number - 1,000 homes. This is not a slight overshoot. It is a 117% breach of the limit that residents themselves set. 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.

The Southwater Neighbourhood Plan is recent, legally adopted, and carries full weight. Berkeley Homes has provided no independent evidence to justify overriding a community plan that was voted for by local people just five years ago.

Housing planners may state that the plan is "out of date" being 5 years old but an online petition against this proposal has already attracted over 3000 signatories so the community sentiment back in 2021 is still current.

I ask that the Berkeley Homes 1,000-home proposal be refused because it directly and fundamentally conflicts with the adopted Southwater Neighbourhood Plan on the number of homes allowed.

Sub-Objection 1B: The proposal creates a second village centre, which the Neighbourhood Plan prohibits

The Southwater Neighbourhood Plan contains a specific and clear policy: Southwater must remain a single-centre village, with its shops, services and facilities focused around Lintot Square. This is not a minor preference - it is a core planning principle that residents voted to adopt. Berkeley Homes' proposal includes a large new cluster of shops, community facilities, a primary school, and other services on the western edge of the village - effectively creating a second village centre. This would split the village in two, diverting activity away from the existing centre and changing the fundamental character of Southwater.

The proposal fails to consolidate the existing settlement of Southwater and would effectively create a split two-neighbourhood settlement instead of a coherent community. The proposal also extends development well beyond the village boundaries set in the Neighbourhood Plan. Much of the proposed site is on land that the Plan specifically identifies as outside the permitted development area. A previous Berkeley Homes application for 1,500 homes on the same site (reference DC/22/1916) was withdrawn in February 2023 after Horsham District Council planning officers concluded it was unacceptable. These fundamental concerns have not been resolved - they have simply been repackaged.

I ask that the Berkeley Homes 1,000-home proposal be refused because it violates Neighbourhood Plan policy SNP1.1(a) by creating a second village centre and extends beyond the village boundaries set in the adopted plan.

Objection 2: The Land Cannot Drain Properly and the Development Will Make Flooding Worse

Sub-Objection 2A: Weald Clay soil means standard drainage solutions do not work here

I am objecting to the Berkeley Homes proposal to build 1,000 homes on farmland northwest of Southwater on the grounds that the site cannot be safely drained.

The entire site sits on Weald Clay - a soil type officially classified by the Environment Agency as having almost no ability to absorb water. This is the fundamental hydrological character of this land. It is not a marginal issue that can be engineered away. On Weald Clay, standard drainage solutions - soakaways, permeable paving, infiltration trenches - simply do not work. Berkeley Homes would have to rely entirely on large above-ground storage ponds, underground tanks, and carefully managed outflows to local streams and ditches. At the scale of 1,000 homes, with thousands of roofs, roads and driveways replacing farmland, this is an enormous engineering challenge.

Planning rules now require drainage systems to cope with a 40% increase in rainfall intensity to account for climate change. The 2025 drought - the worst in 132 years - demonstrates this is not a theoretical risk.

Berkeley Homes has not provided an independently verified drainage strategy that proves this is achievable. Gardens on the Blakes Farm estate nearby have flooded repeatedly over many

years - direct evidence of what happens when this clay soil is built over without adequate drainage.

I ask that the Berkeley Homes 1,000-home proposal be refused until an independent, specialist drainage engineer - with specific Weald Clay experience - has verified that flooding risk will not increase for existing residents or downstream watercourses.

Sub-Objection 2B: The drainage works risk permanently damaging two areas of irreplaceable ancient woodland

I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater because the drainage works required could permanently damage two areas of ancient woodland.

Courtland Wood and Smith's Copse lie immediately alongside the proposed development site. Both are designated ancient woodlands - habitats that have been continuously wooded for over 400 years and are considered irreplaceable under national planning law.

Once damaged, ancient woodland cannot be restored. The threat is not just from bulldozers entering the woodland directly. Large-scale drainage engineering on Weald Clay 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 any direct physical contact.

This is a well-evidenced, recognised risk - yet Berkeley Homes has not submitted any independent hydrological assessment of the impact their drainage works would have on these woodlands. A developer's own consultant assessment is not sufficient for something this serious and irreversible.

I ask that the Berkeley Homes 1,000-home proposal be refused until a fully independent, peer-reviewed hydrological impact assessment on Courtland Wood and Smith's Copse has been completed and published for public scrutiny.

Sub-Objection 2C: Flooding from this development would affect existing residents and cannot be undone

I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater because the development will increase surface water flooding that already affects existing residents.

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 scale of attenuation required to manage this runoff is substantial. The roofs alone - at 50m² per home across 1,000 properties and a rainfall of 0.75m - would generate enough water to require 7.5 hectares of child-safe attenuation area (defined as no more than 50cm water depth). Once anticipated climate change factors are applied, that figure rises to 10.5 hectares. This is an enormous land take within the development, and there is no evidence that Berkeley Homes has adequately planned for it.

Local streams and drainage channels in this area already overflow during heavy rain. Residents already experience waterlogged gardens and flooded access routes after storms.

Adding the runoff from 141 hectares of new hard surfaces - however it is managed by attenuation ponds - creates a real and material risk of making this significantly worse.

Climate change is making extreme rainfall events more frequent and more intense. The drainage system for this development must be designed for the worst case, not average conditions. There is no evidence that Berkeley Homes has done this. If flooding increases after the development is built, there is no remedy available to affected residents. The damage is permanent.

I ask that the Berkeley Homes 1,000-home proposal be refused on the grounds that it poses an unacceptable and unmitigated risk of increasing flood risk to existing Southwater residents and properties.

Sub-Objection 2D: Homes built on flood-risk land cannot be insured under the Flood Re scheme - buyers may be unable to get a mortgage, making them unsellable

I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater

on the grounds that homes here may be uninsurable and unmortgageable - raising a simple question: what is the point of building homes that buyers cannot get a mortgage on? The UK has a flood insurance safety-net called 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. This is deliberate policy, not an oversight. The ABI's Director General said in 2025 that new homes 'must not be built in floodrisk areas.' The Flood Re exclusion of new builds exists specifically to discourage exactly this type of development.

Berkeley Homes' site sits on Weald Clay with a documented local history of surface water flooding. Building 1,000 homes here - permanently excluded from Flood Re, facing growing flood risk, with no confirmed insurance availability - risks creating a development that buyers cannot insure, cannot mortgage, and cannot sell. That is not housing delivery. It is a financial trap sold to families.

I ask that the Berkeley Homes 1,000-home proposal be refused until Berkeley Homes demonstrates, with independent actuarial evidence, that flood insurance will be available and affordable for all 1,000 homes on this site in perpetuity - given that every property will be permanently excluded from the UK's Flood risk safety net scheme from the day it is built thus resulting in the inability to obtain mortgages to purchase said homes..

Objection 3: Local Infrastructure Cannot Support 1,000 More Homes - No Joined-Up Assessment Has Been Done

Sub-Objection 3A: Over 2,100 new homes are already committed - no cumulative impact assessment has been done

I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater because no proper assessment has been made of the combined impact of all the growth Southwater is already absorbing.

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. That is already 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.

No one has carried out an assessment of what all this growth means for Southwater's infrastructure together. Berkeley Homes has assessed only its own proposal in isolation - ignoring the 1,150 homes already in the pipeline. That approach is not good enough.

The timescale of this development compounds the problem further. At Berkeley Homes' known build-out rate of 50-60 homes per year, and with a further estimated 200 units yet to be built elsewhere, construction on this site would extend over 20 years. A planning authority is only legally obliged to demonstrate a five-year housing land supply - yet approving this application would effectively hand a single developer a 20-year land supply in this location. Locking up this land for two decades since one developer's build-out capacity is not a sound or proportionate use of the planning system.

When Berkeley Homes applied for 1,500 homes on this same site in 2022, Horsham planning officers concluded the cumulative infrastructure impact was one of the key reasons the application was unacceptable. That application was withdrawn in February 2023. The infrastructure position has got worse since then, not better - yet Berkeley Homes is now asking for 1,000 homes with no better evidence.

I ask that the Berkeley Homes 1,000-home proposal be refused until a full, independent cumulative infrastructure assessment covering all committed and proposed Southwater development has been completed and published.

Sub-Objection 3B: GP and NHS capacity is already overstretched - no plan exists to expand it

I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater on the grounds that NHS and healthcare infrastructure is already overwhelmed, and no plan exists to expand it.

Anyone who lives in Southwater knows how hard it is to get a GP appointment. The surgeries serving the village are already under serious pressure from the population that is already here - let alone the 1,150 new homes already approved and under construction. The situation is not

simply one of physical capacity: the local surgery appears to have room to accommodate additional GPs but is currently unable to recruit them. 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 any NHS dentist at all.

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.

NHS England has not confirmed that primary healthcare capacity exists or can be funded to serve the additional population from Berkeley Homes' proposal. There is no costed, legally secured plan for a new GP surgery or expansion of existing facilities. 'We will work with the NHS to address this' is not a plan - it is a hope.

Previous large Southwater developments came with promises of community infrastructure that did not materialise on time, or at all. Residents have already been let down once. Approving 1,000 more homes based on promises is not acceptable.

I ask that the Berkeley Homes 1,000-home proposal be refused until NHS England has formally confirmed that funded, deliverable primary healthcare provision exists to serve the combined population increase from all committed Southwater developments.

Sub-Objection 3C: Sewage infrastructure is already failing, and Southern Water has no comprehensive and legally committed expansion plan to address the issue.

I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater on the grounds that 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 for years - problems that Southern Water has repeatedly failed to resolve. Adding 1,000 more homes to an already strained network, without a confirmed and funded upgrade, is irresponsible.

A serious new concern has emerged. 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 own documents (Flood Risk Assessment and Outline Drainage Strategy, 27/02/2026, para. 11.1.3; Annex H) confirm that while it intends to increase capacity at Barns Green, this will take at least 24 months - and potentially longer. Approving development now 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.

Southern Water's track record offers no reassurance. In 2020 it pleaded guilty to 51 criminal offences of deliberately dumping untreated sewage, was fined £90 million, and was described by the Environment Agency as the worst case in its history. The company's financial conduct since then deepens the concern further. Ofwat has determined that Southern Water must invest sufficiently to require customer bills to rise by 44% by 2030 - a ruling Southern Water is actively appealing. That appeal speaks for itself: this is a private equity-run enterprise resisting the investment its regulator has deemed necessary, and there is no credible basis for assuming it will voluntarily fund the future-proofed infrastructure capacity that 1,000 new homes would require.

Planning permission must not be granted on the assumption that a company actively resisting investment will deliver the infrastructure needed. Southern Water must provide a formal, legally binding commitment to expand sewage treatment capacity before any development is permitted. The applicant's own drainage strategy - acknowledging a minimum 24-month upgrade timeline - makes this requirement unambiguous.

I ask that the Berkeley Homes 1,000-home proposal be refused until Southern Water has provided a formally confirmed, independently verified, and legally secured commitment to upgrade sewage and wastewater treatment capacity for Southwater without unduly impacting neighbouring villages.

Sub-Objection 3D: Water scarcity is an unresolved infrastructure constraint - removing a planning rule did not fix the physical problem

I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater on the grounds that water scarcity is a real, unresolved infrastructure constraint - and the removal of the formal water neutrality planning condition has not changed the physical facts on

the ground.

In October 2025, Horsham District Council announced that the 'water neutrality' requirement - which had paused large housing developments in this area for several years - had been lifted. This has been used to suggest the water supply problem is solved. It is not. Removing a planning rule does not create more water. It simply removes the formal mechanism that required the problem to be addressed before building proceeded.

The Sussex North Water Supply Zone, which serves Southwater, is a designated water-stressed area. Southern Water has itself confirmed that cumulative housing growth in this zone creates risks to its ability to sustainably manage groundwater abstraction at Hardham. The physical constraint has not gone away - it has been administratively set aside.

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 - which did not materialise. England already faces a projected water deficit of nearly 5 billion litres per day by 2050, with Sussex among the worst-affected regions.

We also have direct local evidence that the water supply for Southwater is already under strain. Residents on the recently built Berkeley Homes 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 they were not getting enough water pressure or volume for basic daily needs. This is happening now, before 1,000 more homes are added.

In addition, Horsham District Council's own water demand monitoring is misaligned with Southern Water's published consumption figures by 21%. This means the official planning calculations used to argue that water supply is adequate are themselves unreliable.

I ask that the Berkeley Homes 1,000-home proposal be refused until an independent hydrogeological assessment - not a Southern Water self-assessment - has confirmed that potable water supply in the Sussex North Water Supply Zone is sufficient and sustainable for 1,000 additional Southwater homes across all weather conditions, including drought years.

Objection 4: The Roads Cannot Handle the Traffic and There Is No Realistic Alternative to the Car

Sub-Objection 4A: The A24 and local road network are already at capacity - adding 1,000 homes makes it unworkable

I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater because 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. This is not residents' opinion - it is confirmed in Horsham District Council's own evidence base.

The Hop Oast roundabout, which would be one of the main access points 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 the Horsham Golf Club site, would bring 1,800 new car-dependent households through this single junction.

Adding 1000 homes will increase car dependency and increase the number of cars on local roads by approximately 1500 in the village which will add to the traffic attracted to the village for school drop off and pickup from villages outside Southwater. The problem will not simply be an increase of traffic due to houses but also due to the new school being promoted as part of the proposal.

When Berkeley Homes previously applied for 1,500 homes on the same site, West Sussex County Council Highways raised serious unresolved objections on traffic grounds. The application was withdrawn. Those concerns were never resolved - and the traffic position has got worse since then.

Adding traffic signals or road markings to an already-overloaded junction does not solve the problem. It delays it and makes it slightly more orderly. The underlying capacity is still exhausted and would create traffic bottlenecks within the village and on the A24 resulting in gridlock for new and existing residents.

I ask that the Berkeley Homes 1,000-home proposal be refused on the grounds that the A24 corridor and local road network cannot accommodate the traffic it would generate, and no viable mitigation has been demonstrated.

Sub-Objection 4B: Southwater is a car-dependent location

I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater because this is one of the worst possible locations for large-scale housing in terms of car dependency.

Southwater has no railway station. Christ's Hospital station - the nearest - is remote from the village, served by infrequent 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 new Southwater resident will need a car for virtually every significant journey. This is not a lifestyle choice - it is a geographical fact. HDC's own Local Cycling and Walking Infrastructure Plan (2020) confirms that the A24 and railway are hard physical barriers that cannot realistically be crossed on foot or by bike.

Southwater has very limited employment of its own. People who move here for work will commute by car, adding daily vehicle movements to roads that are already at capacity. This is the opposite of the sustainable development that planning rules require.

The question of where new residents will look for services and schools deserve scrutiny.

Berkeley Homes' supporting documents suggest a school linkage with the Horsham Golf Club development, but this connection has not been made sufficiently clear by the applicant. It is also unclear whether the Golf Club development is looking to Southwater more broadly for other services and infrastructure - or whether, in practice, residents of both developments will look to Horsham for schools, healthcare and employment rather than to Southwater at all. If the latter is the case, it further undermines the case for locating large-scale development here: new residents will not be served by Southwater's limited facilities, they will simply add to the traffic burden on routes into Horsham.

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.

I ask that the Berkeley Homes 1,000-home proposal be refused on the grounds that the site is inherently car-dependent by geography, with no credible prospect of genuinely sustainable travel alternatives being delivered.

Objection 5: The Development Will Damage Irreplaceable Ancient Woodland and Destroy Local Wildlife

Sub-Objection 5A: Two areas of irreplaceable ancient woodland are immediately adjacent and at direct risk

I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater because it poses a serious risk to two irreplaceable areas of ancient woodland.

Courtland Wood and Smith's Copse sit immediately alongside the proposed development site. Both are designated ancient woodlands - habitats that have existed continuously for over 400 years. Under national planning law, ancient woodland has near-absolute protection. It cannot be recreated. It cannot be compensated for by planting trees elsewhere. Once damaged, it is gone.

The risk is not limited to direct physical encroachment. The massive drainage engineering that would be required on this Weald Clay site - large attenuation ponds, underground storage tanks, and controlled drainage channels - would change the movement of water through the soil across a wide area around the site. Changes to groundwater levels and soil moisture can damage and kill ancient woodland trees through their root systems without any physical entry into the woodland.

Berkeley Homes has not provided any independent assessment of this specific hydrological risk to Courtland Wood and Smith's Copse. A developer's own consultant report is not sufficient for a risk that is permanent and irreversible.

I ask that the Berkeley Homes 1,000-home proposal be refused until a fully independent, peer-reviewed assessment of the hydrological impact on Courtland Wood and Smith's Copse has been carried out and published.

Sub-Objection 5B: Wildlife surveys are incomplete - Berkeley Homes is trying to survey after approval, not before

I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater

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

Planning law is clear: the impact on protected wildlife must be properly assessed before planning permission can be granted. It cannot be deferred to a later stage. This is not a technicality - it is a fundamental safeguard designed to prevent irreversible harm to wildlife being done first and assessed second.

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

The disruption caused by a 1,000-home development to these routes and habitats has not been adequately assessed.

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

I ask that the Berkeley Homes 1,000-home proposal be refused until fully independent, comprehensive wildlife surveys covering the entire site have been completed, published, and independently assessed.

Sub-Objection 5C: The 10% biodiversity gain requirement cannot be met locally - it risks an ecological desert next to homes

I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater on the grounds that the legal requirement for a 10% biodiversity gain has not been credibly demonstrated.

Since 2024 all major planning applications must achieve a minimum 10% net gain in biodiversity as a legal condition of planning permission. This is not optional. Berkeley Homes must demonstrate - before permission is granted - that biodiversity will measurably increase because of this development.

On a Weald Clay site, achieving meaningful biodiversity gain on the development site itself 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.

I ask that the Berkeley Homes 1,000-home proposal be refused until a credible, independently verified biodiversity net gain strategy is submitted that demonstrates genuine local ecological improvement - not remote offsetting.

Objection 6: This Development Will Permanently Change the Character and Feel of Southwater

Sub-Objection 6A: At 1,000 homes, this turns a village into a small town - forever

I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater because at this scale, it does not extend the village - it fundamentally transforms it.

Southwater is a village. That is what it is and what residents chose to live in. The open farmland to the northwest - 141 hectares, the equivalent of roughly 200 football pitches - currently forms a natural transition between the village edge and the open Low Weald countryside. Once it is built over, that countryside is gone permanently.

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.

The Southwater Neighbourhood Plan, voted for by residents, specifically requires that development avoids coalescence with neighbouring settlements and respects the existing landscape character of the village. This proposal does the opposite.

Berkeley Homes has not demonstrated that it has engaged seriously with any design framework governing how growth should be integrated into Southwater. It is unclear whether the applicant has referenced Horsham District Council's design guidance, any settlement-specific design guide, or the Southwater Neighbourhood Plan's own design principles. HDC should satisfy itself that such a framework exists and that Berkeley Homes has been required to demonstrate compliance with it. Without that, there is a real risk that this development degrades the character and coherence of the settlement rather than adding to it.

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.

I ask that the Berkeley Homes 1,000-home proposal be refused on the grounds that it will cause permanent and unacceptable harm to the landscape character and rural setting of Southwater village.

Sub-Objection 6B: Southwater sits on a flat open plateau - 1,000 homes will be visible for miles and will permanently alter the skyline

I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater because 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.

This is not a subjective preference. Protecting landscape character is a specific requirement of national planning law and the Southwater Neighbourhood Plan.

I ask that the Berkeley Homes 1,000-home proposal be refused until a full cumulative Landscape and Visual Impact Assessment covering all three concurrent Southwater developments has been independently conducted.

Objection 7: The 'Affordable' Homes Will Not Be Affordable to Local People and Local Need Has Not Been Proven

Sub-Objection 7A: 'Affordable' at 80% of market value is not affordable on local wages

I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater on the grounds that the homes described as 'affordable' are not affordable to the people who live and work in Southwater.

In the planning system, 'affordable housing' means homes priced at up to 80% of the open market value. In Southwater, where the median house price is approximately £430,000, that means an 'affordable' home would cost around £344,000. Berkeley Homes does not appear to be proposing any social rented housing at all - only affordable homes to buy. Yet 80% of market value is unaffordable to most people on local wages, making the distinction between 'affordable to buy' and 'market price' largely meaningless in practice.

The median wage for people in this area is approximately £36,000 per year. A person on that salary can borrow approximately £144,000 on a standard mortgage. That is less than half the price of an 'affordable' home.

This is not affordable. Calling it affordable does not make it affordable. 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.

Horsham District Council's 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. That would represent a serious failure of planning policy and an unacceptable outcome for the people placed there.

I ask that the Berkeley Homes 1,000-home proposal be refused until Berkeley Homes demonstrates, with independently verified evidence, that the affordable homes proposed will be genuinely accessible to people on local average wages in Southwater.

Sub-Objection 7B: Berkeley Homes can use a 'viability assessment' to reduce the affordable homes it builds - with no independent check

I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater because the mechanism for delivering affordable homes can be legally used to reduce the number built, with no meaningful independent oversight.

Horsham District Council's 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.

The result is that the number of affordable homes delivered by large developments is frequently far lower than the headline figure promised at the planning application stage. This pattern has been seen repeatedly across the country.

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.

I ask that the Berkeley Homes 1,000-home proposal be refused until the affordable housing commitment has been independently verified by a surveyor appointed by the Council, not by Berkeley Homes, and the number of genuinely affordable homes is legally fixed as a condition of any permission.

Sub-Objection 7C: No genuine local housing need for 1,000 homes in Southwater has been demonstrated

I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater on the grounds that no genuine, independently demonstrated local housing need for 1,000 homes in this specific village has been established.

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.

Horsham's own economic strategy identifies North Horsham and the Gatwick Diamond as the primary employment and growth corridors - not Southwater. Building 1,000 homes in Southwater does not put people near jobs - it creates a commuter dormitory served by a congested A-road.

Berkeley Homes owns this land. That is why it is promoting this site. Land ownership is not the

same as planning justification.

I ask that the Berkeley Homes 1,000-home proposal be refused until Horsham District Council and Berkeley Homes have published transparent, independently reviewed evidence that genuine local housing need for 1,000 homes in Southwater - not in Horsham District generally - has been established.

Objection 8: There Is Not Enough Water and the Sewage System Is Already Failing

I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater on the grounds that the water supply infrastructure for this area cannot reliably support this level of additional demand.

The summer of 2025 was the hottest since weather records began in 1884. The preceding spring was the driest in 132 years. Hosepipe bans were imposed across the region. The Environment Agency confirmed in October 2025 that England needed at least 100% of average winter rainfall just to recover from drought - and that rainfall did not materialise at the required levels.

Sussex is among the parts of England where water stress is already most acute. The Environment Agency projects a national water deficit of nearly 5 billion litres per day by 2050. This is not a future forecast that planners can choose to ignore - it is a present reality that is getting worse year by year.

The basis on which Horsham District Council is monitoring water demand capacity is itself fundamentally flawed, and this materially undermines any assurance that supply infrastructure can accommodate this development. HDC's Planning Policy Team Leader has confirmed that the Council uses an assumed consumption figure of 110 litres per person per day (lpppd) - described as being in line with Building Regulations for a water-stressed area. That figure is not a current consumption measure. It is an aspirational target set by the Environment Agency for achievement by 2050. Using it as a monitoring baseline is a methodological error, not a pragmatic approximation.

Southern Water's own published data for April 2025 to March 2026 records actual average consumption as follows: 232 litres per day for single occupancy households; 301 litres per day for dual occupancy households; and approximately 335 litres per day for an average 2.5-person household. HDC's assumption of 110 lpppd equates to approximately 275 litres per day for a 2.5-person household - a discrepancy of approximately 60 litres per household per day, representing an underestimate of around 21%. A sample survey of actual consumption at the nearby Broadacres new-build development - properties fitted with water-efficient fittings - recorded average consumption of approximately 200 lpppd, nearly double the Council's monitoring assumption.

This error was raised explicitly with HDC, supported by Southern Water's own published data. Despite being informed that its methodology is in error by approximately 21%, the Council has confirmed it intends to continue using this figure. Save Rural Southwater has raised this failure as a formal maladministration complaint. The Council is therefore on notice that its monitoring methodology is not only technically wrong but is the subject of an active formal complaint - and yet it continues to use that methodology as the basis for approving major new development. The 31 practical consequence is that HDC risks approving a volume of development that will exceed Southern Water's actual supply capacity, resulting in water shortages for existing and future residents alike.

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.

Southern Water imposed hosepipe bans in 2025. It cannot currently guarantee supply reliability to its existing customers in dry years. Adding 1,000 new homes - on top of the 1,150 already committed in Southwater - without a confirmed, independently verified supply strategy is not acceptable. Removing the formal water neutrality planning condition in October 2025 removed a legal mechanism - it did not solve the physical water supply problem. The drought is real. The shortage is real.

I ask that the Berkeley Homes 1,000-home proposal be refused until Southern Water has provided a formal, independently verified confirmation that water supply can reliably serve

1,000 additional homes in Southwater - including during drought years.

Objection 9: Brownfield land elsewhere in the district should be developed first

I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater on the grounds that 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. Granting permission for large-scale greenfield release at Southwater while brownfield sites across the district sit unbuilt and unprogressed is not consistent with the brownfield-first principle that lies at the heart of national planning policy.

I ask that the Berkeley Homes 1,000-home proposal be refused, and that Horsham District Council be required to demonstrate that all identified brownfield land on its December 2024 Brownfield Register has been fully considered before any further greenfield development at Southwater is permitted.

For these reasons, I respectfully request that the application be refused.

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