

**Camomile Barn,
Emms Lane,
Brooks Green,
West Sussex,
RH13 0TR**

28th January 2026

Planning Department, Horsham District Council, Parkside, Chart Way,
Horsham, RH12 1RL – sent by email via Planning Portal

To the Planning Officer,

**OBJECTION: Application DC/25/2057 Land North of Little Slaughterford,
Chapel Road, Barns Green 68 Dwellings – Miller Homes**

I object to this application for the following reasons.

(1) Discharge of Sewage into Stream from Sewage Works

There are already documented discharges of raw sewage contaminating the local watercourses at times of heavy rainfall and the proposed development will increase this serious issue.

The Council's own committee reports have documented that in 2022 Barns Green experienced 43 sewage overflow events totaling 411 hours which equates to more than 17 days of raw sewage discharge. Overflows in 2022 are not an isolated case, monitoring by local residents has confirmed that the discharge of sewage from the treatment works is a regular and continuing issue.

Southern Water's response makes no mention of these overflow events and provides no assurance that additional flows from the proposed development will not exacerbate the sewage discharge.

Their response only considers the immediate connection by confirming capacity at 'manhole reference TQ12265901', it does not assess downstream network capacity and overall ability to cope including the sewage treatment works or mention the sewage discharge events.

It is therefore, an incomplete and mis-leading response.

Furthermore there are serious errors in the information stated by Southern Water. The following are examples.

Their reference to the capacity at manhole reference TQ12265901 is staggering because this is a manhole located in Stoke D'abernon in Surrey, not even in this County.

In a letter sent to a local resident in April 2025 they stated that their assessment of the Barns Green sewage treatment works was based on a current population of 1,018 and that the treatment works had capacity to deal with waste from up to 1,400 people. Calculations of the actual population now are at least 1,390, and any new development will push this to beyond 1,500. Way beyond the capacity stated by Southern Water.

Consequently the information provided by Southern Water is worse than incomplete and mis-leading, it has no credence or credibility and cannot be relied upon to describe the real situation.

Overflows evidence at the treatment works shows there is insufficient capacity to deal with the current sewage flows, and any development will seriously increase this widespread pollution.

(2) Flooding – Roadway Surface Water and Other Runoff

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

Serious flooding has occurred recently and regularly in this area with water flowing down the hill entering buildings including the village shop which is opposite the site. This flooding covers a wide area even extending as far as properties in Six Acres Close.

Currently the field where the development is proposed reduces flooding by holding water during periods of rainfall and slowing the runoff flow. The flooding risk will be exacerbated by both the increased runoff and the speed of runoff from the proposed housing development with all its paved areas and roadways.

Drainage measures proposed by the developers will not guarantee the resolution of this risk of flooding which will increase due to the proposed housing. Even before considering the impacts of climate change.

(3) The Removal of Ancient Hedges

The developers propose to remove the ancient hedge to the front of the site to provide traffic sight lines and facilitate road widening. This will destroy established and protected natural habitat which is so important to wildlife.

Without the removal of this hedge it will not be possible provide safe traffic movement in and out of the proposed development.

This hedge is also an important contributor to drainage management and flood prevention because it acts as a buffer holding soil on the land which would otherwise enter the drains.

(4) Harm to Ancient Woodland and Other Habitat Loss

The western boundary of the site adjoins Ancient Semi Natural Woodland recorded on the Ancient Woodland Inventory as reference ANCWO0122269. This is an irreplaceable habitat protected under NPPF paragraph 186(c), which states:

‘Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists’.

There are no exceptional reasons in this case, in fact there are a number of respects why this development should not be approved from a habitat loss consideration alone, including:

- **An Inadequate Buffer Zone** - the applicant proposes an inadequate buffer zone of only a 15m buffer, the minimum recommended in the Standing Advice. However, the Standing Advice explicitly states:

‘Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone’.

A larger buffer is warranted in this case because:

- Dormice are present. The applicant's own Dormouse Survey Report (2025) confirms the presence of hazel dormice, a European Protected Species in hedgerows connecting to the woodland
- Significant recreational pressure. 68 homes will generate approximately 156+ residents, plus visitors and pets, creating substantial pressure on the woodland edge

- The site is on Weald Clay with documented drainage issues; changes to surface water management could affect the woodland's hydrology.
- **Footpath Through the Buffer Zone** - most seriously, the applicant proposes to route a permanent public footpath through the 15m buffer zone, connecting the development to the bridleway network.

The Standing Advice is clear on what buffer zones should comprise:

‘A buffer zone should consist of semi-natural habitats such as: woodland; a mix of scrub, grassland, heathland and wetland’. And crucially ‘You should not approve development proposals, including gardens, within a buffer zone’.

A surfaced, maintained footpath serving as the primary pedestrian route for 156+ residents is not a semi-natural habitat. It is a form of development within the buffer zone that the Standing Advice explicitly states should not be approved.

The applicant attempts to justify this by claiming the route utilises an ‘existing agricultural access point’. This reasoning is fundamentally flawed because an occasional agricultural vehicle passing a few times per year is not comparable to a permanent recreational path used daily. The proposed footpath will create a ‘desire line’ encouraging regular incursion into the ancient woodland.

Also dog walkers, children, and residents will inevitably stray beyond the path into the woodland itself causing damage to the habitat.

- **Indirect Effects Will Cause Deterioration**

The Standing Advice identifies specific indirect effects that can cause deterioration of ancient woodland. The following will all occur if this development proceeds:

Standing Advice: Indirect Effect	How This Development Causes It
<i>Increasing disturbance to wildlife from additional people and traffic</i>	68 homes = 156+ residents + over 200 vehicle movements daily
<i>Increasing damage to habitat from trampling</i>	Footpath through buffer; inevitable informal access beyond
<i>Increasing damaging activities like domestic pets’</i>	Cats predating wildlife; dogs disturbing ground-nesting birds and dormice
<i>Increasing light and air pollution</i>	Street lighting, car emissions, changed drainage patterns

NPPF paragraph 186(c) protects ancient woodland from deterioration, not just direct loss. The cumulative indirect effects from 68 homes will cause deterioration of this irreplaceable habitat over time.

(5) Inadequate Infrastructure including Electricity Supply

The applicant's Energy Statement confirms all 68 homes will use air source heat pumps for heating which is a significant electrical load. Yet their application documents contain no consultation with UK Power Networks and no assessment of grid capacity.

The recent Sumners Fields development with only 32 houses requires a backup diesel generator because the local network cannot reliably supply those homes. If this is the case how will an additional 68 houses with electric heating be supplied with electricity ?

It is also of concern that the school will have capacity for additional pupils.

(6) 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 known bottleneck for traffic and the parking serving the village shop which will be impacted by the proposed development.

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 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 shop, and complicate 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 32 homes at Sumners Fields, the 50+ homes allocated in the Neighbourhood Plan, and the combined effect on the Chapel Road/Two Mile Ash Road junction.

The cumulative traffic impact has been ignored and not assessed.

(7) Public Transport Limitations and Issues

The applicant's Transport Statement relies heavily on a 'Vision Scenario' assuming significant modal shift away from private cars. In a rural village with almost non-existent public transport, this is fantasy.

The applicant's own data shows 81% of local residents drive to work. Christ's Hospital station is 3.7km away which is too far for most people to walk or cycle regularly.

Furthermore there is only a very limited bus service which the applicant's Transport Statement's own timetable reveals:

Monday	4 buses
Tuesday	8 buses
Wednesday	2 buses (at 07:00 and 16:57 only)
Thursday	8 buses
Friday	4 buses
Weekends	No buses
Evenings	No buses

The optimistic assumptions in the applicant's Transport Statement are not credible. With only two buses on a Wednesday and no evening services at all, this is not a location where sustainable transport is a credible alternative to the car.

(8) Loss of Village Amenity

The field where the development is proposed was previously the village green, and is currently used as a village amenity which also hosts the annual Classic Car Show (raising tens of thousands for charity) and Run Barns Green (supporting St Catherine's Hospice). These community and charity support events would be lost forever.

More importantly the proposed road layout with an entry road to the housing opposite the village shop may cause adjacent parking concerns and have a serious detrimental impact on both the Queen's Head pub and the village shop. Both the pub landlord and the village shop owner have advised that without on street parking their business will not be viable.

The consequence would be a catastrophic amenity loss of the community pub, village shop, and post office which are essential to elderly residents in a village that has such limited public transport.

(9) Village Character, Listed Buildings and Heritage Impact

The 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 village centre and open countryside. Building here would:

- destroy this green gap entirely
- a development of this size in this location will seriously harm the setting of listed buildings in close proximity, including Little Slaughterford, Bennetts, Herons Reach and the Queen's Head.
- surround the pub which is a vital community asset with housing.

(10) Loss of Rural Amenity

The proposed housing development will destroy the current Rural Amenity which is created by the field with grazing animals adjacent to historic buildings.

(11) Over Development, Inappropriate House Design and Density

Even the draft HDC Local Plan only allocated this site for 50 homes. The applicant is proposing 68 which is a 36% increase with no justification.

Consequently 68 homes would represent clear overdevelopment.

This development will conflict with Planning Policy representing a disproportionate increase in the number of dwellings in the Parish, at a density which is out of alignment with neighbouring properties.

The design style and in particular the imposing height of the buildings is not appropriate for such a rural village location, and the housing density is more akin to an urban location creating an urban enclave which does not integrate into its surroundings. This is in conflict with Neighbourhood Plan.

(12) Housing Mix and Deliverability Concerns

The consultation response from the Council's Housing Officers dated 15th January 2026 does not support the development for the following significant reasons:

- **Wrong Housing Mix**

The proposed affordable housing is heavily weighted towards 2-bedroom units (76% of provision). Yet the Housing Register shows that 61% of demand is for 3-4 bedroom family homes – households who are waiting three times longer than those needing smaller accommodation.

As the Housing Officers state: *'The scheme would largely eliminate the identified two-bedroom requirement while failing to adequately address the most acute and long-standing housing needs within the parish'.*

- **Deliverability Concerns**

The Housing Officers express further concern that the scheme may not attract Registered Providers due to its small size and rural location. They warn of *'a risk that the applicant may seek a commuted sum in lieu of on-site affordable housing provision at a later stage'.*

The implications of these concerns are that if the Council's own Housing team do not support this application, how can it be argued that this is a suitable and appropriate development. The applicant's primary justification is addressing housing need, and yet the homes proposed do not match the need identified on the Housing Register.

(13) Conflicts with the Countryside Policy

The proposed development site lies outside the Built-up Area Boundary (BUAB) and is defined as 'Countryside'. Policy 26 in the HDC Local Plan states explicitly that development in the countryside should only be permitted if it is essential to its location.

This is a speculative housing scheme and is not essential.

In Addition to the Reasons Given Above the Applicant's Submitted Information Includes Inaccuracies and Mis-leading Information

Several consultee responses indicate that further information is required and identify that incorrect information has been submitted, which invalidates aspects of the Application and question its overall validity, including :

- **Southern Water's response** addresses only the immediate connection point and does not assess the documented sewage overflow problems or cumulative network capacity. Additionally there are very serious factual errors in information stated by Southern Water which are detailed in Section (1) above.
- **Air Quality Assessment Errors.** The Environmental Health consultation response identifies significant errors in the submitted Air Quality Assessment:
 - two different traffic figures are used (341 and 329) without explanation
 - the Emissions Factor Toolkit outputs are described as 'inaccurate' – 'too low for NO₂ emissions and higher than expected for PM_{2.5}'
 - the damage cost calculations do not follow the correct methodology

Environmental Health carried out their own calculations and arrived at a much lower cost than was reported.

- **The Statement that 'there is no evidence of flooding'.**
- **Water Course and Catchment References.** The consultant's flood risk assessment report refers incorrectly to the Arun catchment and not the Adur and Ouse, which questions the whole credibility of this report.

This means the sewage overflows at the treatment works go into the Knepp rewilding estate and not Southwater as claimed in the report.

- **The Statement that 'the site is on the outskirts of the village'.** This is mis-leading because in reality the site is at the very central community heart of the village.

Conclusion

I recognise that Horsham DC are experiencing pressure to deliver housing, and with a justified and proven local demand this has to take place. The Barns Green community accepted growth through the Neighbourhood Plan process and identified sites where it could be accommodated sustainably.

This development application is not one of the identified sites and is not meeting proven local housing demand in an appropriate manner, and should be refused.

Furthermore this is speculative housing development which is not essential to the location, and would urbanise and destroy a rural countryside green field which is in contradiction of the Countryside Policy.

The proposed road layout for the housing may also jeopardise the viability of the community pub, village shop and post office which are essential to elderly residents due to the limited public transport.

Additionally the proposed development will also significantly damage the environment in a number of ways, including important habitat loss.

It will exacerbate the already serious issues regarding surface water flooding and the treatment of and pollution by sewage. Already the current overflows from the Barns Green sewage treatment works are threatening the River Ardur Restoration Project. These seriously damaging overflows will increase if the application is not refused.

I would be grateful if the full contents of this letter could be placed before the Planning Committee.

Yours faithfully,

A solid black rectangular box used to redact the signature of the sender.