

1. Berkeley Homes' 1,000-Home Proposal contravenes Southwater's Neighbourhood Plan

1A: The proposal is more than double what Southwater's Neighbourhood Plan allows

Neighbourhood Plan housing limit: 420–460 homes (approved by referendum, June 2021)

Berkeley Homes proposal: 1,000 homes — 117% more than the Plan allows

Planning rule: Where a proposal conflicts with an up-to-date Neighbourhood Plan, permission should not normally be granted (NPPF Para 14)

I am objecting to the Berkeley Homes proposal to build 1,000 homes on farmland northwest of Southwater on democratic as well as practical grounds.

In June 2021 Southwater residents voted in a referendum 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 arrived at through a proper community-led consultation process, which cost many thousands of pounds.

Berkeley Homes is now proposing to build more than double that number — 1,000 homes. This is a flagrant breach of the limit set by residents within the Neighbourhood Plan.

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 Housing planners may state that the plan is “out of date” being 5 years old but an online petition against this proposal has already attracted over 3000 signatories so the community sentiment back in 2021 is still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

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

Neighbourhood Plan policy SNP1.1(a): Southwater must remain a single-centre village with shops and services focused at Lintot Square

Berkeley Homes plan: Includes a substantial additional commercial hub, shops, and community facilities on the western side of the village

Conflict: Creates a second centre — directly contradicting the Neighbourhood Plan's core principle

I oppose Berkeley Homes' plan for 1,000 homes northwest of Southwater. The Neighbourhood Plan requires Southwater to stay a single-centre village with facilities at Lintot Square—a clear principle decided by residents.

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 therefore 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.

1C: The proposal creates an additional recreational area which would be unmanaged and unregulated, inviting anti-social behaviour.

I oppose the Berkeley plan for 1,000 homes northwest of Southwater because it proposes to get around flood risks by creating new ponds on farmland at the western margin of the development, with footpaths round ponds, adjacent to Courtland Woods and Two Mile Ash Road. This would become a magnet for anti-social behaviour, bonfires, BBQs, drug use, and music, with absolutely no regulation or oversight (unlike Southwater Park). Sussex Police has already stated that it cannot police the area on which Berkeley propose to build 1,000 more homes. This threatens public order, neighbourhood relations, and the peacefulness of an area with multiple Grade II-listed properties and horses adjacent to the proposed development.

I therefore ask that the Berkeley Homes 1,000-home proposal be refused because it violates Neighbourhood Plan policy SNP1.1(a) by creating an unmanaged public space which threatens social disorder.

1D: Building 1,000 more homes adjacent to multiple Grade II-listed properties permanently destroys the historic character of the western edge of the proposed site.

Two fields have been left unexplained on the Berkeley's development map – presumably implied to be a buffer zone between large-scale development and centuries-old listed buildings – but no undertaking has been made to preserve this buffer, and it is already insufficient to preserve the historic setting of the oldest houses along Two Mile Ash Road. Once this character is gone, it is gone forever, to the detriment of all local residents.

1E: Approving this proposal would make neighbourhood planning meaningless

Neighbourhood Plan referendum: Passed June 2021 — the highest form of community consent in planning

Parish Council decision: Voted at Extraordinary Meeting (December 2025) to begin a full review of the Neighbourhood Plan

Risk: Approving 1,000 homes before the review completes would pre-empt and undermine the democratic process

I oppose the Berkeley Homes plan for 1,000 homes northwest of Southwater. Neighbourhood planning allows communities real input on development, and Southwater's plan—passed by referendum in June 2021—represents strong local consent. Although some claim the plan is outdated, over 3,000 have already signed a petition against this proposal, showing that community views remain unchanged.

In December 2025, Southwater Parish Council convened an extraordinary meeting and voted to begin a full review of the Neighbourhood Plan — a step prompted in no small part by the pressure created by this very proposal. That review is now underway, and it represents the appropriate, democratic process through which Southwater's future should be determined.

If Berkeley Homes is permitted to build 1,000 homes before that review is complete, the Neighbourhood Plan's housing limit becomes effectively meaningless. It would signal to every community in England that years spent producing a Neighbourhood Plan count for nothing if a major developer can simply lobby hard enough to override it.

No material planning evidence has been presented by either Berkeley Homes or Horsham District Council to justify overriding the community's own plan. Nothing they have put forward demonstrates that this proposal meets — let alone satisfies — the social or housing needs of the local community.

I ask that the Berkeley Homes 1,000-home proposal be refused, or at minimum deferred until the Southwater Neighbourhood Plan review is complete, so that the community's democratic voice is properly respected.

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

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

Geology: Weald Clay — classified by the Environment Agency as a Non-Aquifer with a very low infiltration coefficient

Effect: Rainwater cannot soak away — standard soakaway drainage systems are completely ineffective on this soil type

Climate rule: All drainage systems must now be engineered to handle 40% more intense rainfall than historic levels (NPPF requirement)

Known problem: Gardens on the nearby Blakes Farm estate have flooded repeatedly due to the same clay soil

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 the Environment Agency classifies as having almost no capacity to absorb water. This is the fundamental hydrological character of the land. It is not a marginal constraint, nor one that can simply be engineered away.

On Weald Clay, standard drainage solutions — soakaways, permeable paving, infiltration trenches — do not function. Berkeley Homes would therefore be forced to rely entirely on large above-ground storage ponds, underground tanks, and tightly controlled outflows to local streams and ditches. At the scale of 1,000 homes, with thousands of roofs, roads and driveways replacing open farmland, this becomes an enormous and inherently risky engineering challenge. Local residents would end up paying the price in flooded homes, gardens and more roads regularly made impassable due to lying water.

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.

2B: The drainage works risk causing permanent damage to two areas of irreplaceable ancient woodland

Adjacent woodlands: Courtland Wood and Smith's Copse — both designated ancient woodlands

Legal protection: Ancient woodland has near-absolute protection under national planning law — it cannot be replaced once damaged

Risk: Large-scale drainage engineering on clay can alter groundwater levels across a wide area, damaging tree root systems without physically entering the woodland

Missing evidence: No independent hydrological impact assessment of these woodlands has been submitted.

I am objecting to the Berkeley Homes proposal to construct 1,000 dwellings northwest of Southwater on the grounds that the drainage works required for the development pose a significant and irreversible risk to two areas of ancient woodland.

Courtland Wood and Smith's Copse lie immediately adjacent to the proposed development site. Both are designated ancient woodlands, having been continuously wooded for over four centuries, and are recognised in national planning policy as irreplaceable habitats. Once damaged, ancient woodland cannot be recreated or restored.

The risk arises not only from potential direct encroachment but from the indirect hydrological impacts associated with large-scale drainage engineering on Weald Clay. This soil type is known to have extremely limited infiltration capacity. Drainage interventions such as attenuation ponds, engineered channels, and controlled outflows can alter groundwater levels across a wide surrounding area. The root systems of ancient woodland trees extend well beyond the mapped woodland boundary, and changes in soil moisture regimes can lead to long-term decline or mortality without any physical disturbance occurring within the woodland itself.

This mechanism of harm is well-documented and acknowledged within ecological and hydrological guidance. Despite this, Berkeley Homes has not submitted any independent hydrological assessment evaluating the potential impacts of their proposed drainage strategy on Courtland Wood or Smith's Copse. Given the seriousness and irreversibility of the risk, reliance on a developer-commissioned consultant report is not adequate or proportionate.

In the absence of a robust, independently verified assessment demonstrating that the proposed drainage works would not adversely affect these irreplaceable habitats, the application fails to meet the requirements of national planning policy relating to ancient woodland protection.

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.'

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

Site area: 141 hectares of agricultural land to be replaced with roofs, roads and hardstanding

Impact: Converting farmland to hard surfaces dramatically increases the volume and speed of

surface water runoff into local streams and ditches

Current drainage: Existing watercourses in the area already surcharge (overflow) during heavy rain events

Irreversibility: Once built, there is no mechanism to undo the drainage impact on existing homes

and gardens

I am objecting to the Berkeley Homes proposal to construct 1,000 dwellings northwest of Southwater on the grounds that the development will materially increase surface water flooding affecting existing residents.

The 141-hectare site is currently farmland. Even on Weald Clay, agricultural land slows the movement of rainwater into local streams and ditches. Replacing this with 1,000 homes and associated hard surfaces — roofs, roads, driveways, pavements and car parks — will significantly increase both the volume and the speed of surface water runoff entering local watercourses.

The scale of attenuation required to manage this runoff is substantial. The roof area alone, at approximately 50 m² per dwelling across 1,000 dwellings and a rainfall depth of 0.75 m, would generate a volume of water requiring 7.5 hectares of child-safe attenuation (defined as a maximum water depth of 50 cm). When climate-change allowances are applied, this requirement increases to approximately 10.5 hectares. This represents a very large land take within the development, and there is no evidence that Berkeley Homes has adequately planned for or accommodated this requirement.

Local streams and drainage channels in this area already exceed capacity during periods of heavy rainfall. Residents currently experience waterlogged gardens and flooded access routes following storms. Introducing runoff from 141 hectares of new impermeable and semi-impermeable surfaces — even if partially managed through attenuation ponds — presents a real and material risk of exacerbating existing flooding. Climate change is increasing the frequency and intensity of extreme rainfall events. Drainage systems for major developments must therefore be designed for worst-case scenarios, not average conditions. There is no evidence that Berkeley Homes has produced a drainage strategy that meets this standard or that has been independently verified.

If flooding increases once the development is built, there is no practical remedy available to affected residents. The harm would be permanent.

In the absence of a robust, independently assessed drainage strategy demonstrating that the development will not increase flood risk to existing properties, the application fails to meet national and local planning requirements relating to flood risk management.

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.

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

ABI (Association of British Insurers) position: Every new home 'must not be built in flood-risk areas' — ABI Director General, 2025

Flood Re exclusion: All homes built after 1 January 2009 are explicitly excluded from Flood Re — the UK's safety-net flood insurance scheme. Every Berkeley Homes property on this site would be unprotected

Scale of the problem nationally: Aviva analysis (February 2026): 1 in 9 new homes built in England between 2022 and 2024 were in flood-risk areas — noneligible for Flood Re.

Mortgage risk: Nationwide Building Society has already stopped offering mortgages on some properties at high flood risk. HSBC warns properties 'are likely to become uninsurable' if Flood Re ends in 2039.

Bank of England warning: A home that becomes uninsurable loses value — potentially substantially. Banks rely on insured property as collateral; without cover, that collateral rapidly loses value.

3 million homes at risk: Researchers at Loughborough University estimate up to 3 million UK homes could become effectively worthless within 30 years if climate adaptation targets are not met

Cost of flood damage: ABI data: average cost of repairing a flood-damaged home is £33,600. In 2024, the ABI paid out a record £585 million in home weather-damage claims

I am objecting to the Berkeley Homes proposal to construct 1,000 dwellings northwest of Southwater on the grounds that the development may result in homes that are uninsurable and therefore unmortgageable. This raises a fundamental question of sound planning: there is no public benefit in delivering housing that future buyers cannot insure, cannot mortgage, and may ultimately be unable to sell.

The UK's flood-insurance safety net, Flood Re, is jointly backed by the Government and the insurance industry. The Association of British Insurers (ABI) applies a clear and absolute rule: Flood Re does not cover any home built after 1 January 2009. Every dwelling proposed by Berkeley Homes on this site would therefore be permanently excluded from this protection. This exclusion is deliberate policy. In 2025, the ABI's Director General stated that new homes "must not be built in flood-risk areas." The exclusion of post-2009 properties from Flood Re exists specifically to discourage developments in locations where flood risk is known or foreseeable.

Without access to Flood Re, homes in flood-risk areas face significantly higher insurance premiums or, in some cases, no insurance availability at all. Without insurance, mortgage lenders will not lend. Nationwide Building Society has already publicly confirmed that it will not offer mortgages on properties it considers to be at high flood risk. HSBC has warned that properties "are likely to become uninsurable" once Flood Re closes in 2039. The Bank of England has cautioned that uninsurable homes lose substantial value because lenders rely on insured property as collateral; without insurance, that collateral is effectively impaired.

Evidence indicates that this is a growing national problem. Aviva's February 2026 analysis found that one in nine new homes built in England between 2022 and 2024 were located in

flood-risk areas and therefore excluded from Flood Re. Research from Loughborough University warns that up to three million UK homes could become effectively worthless within the next 30 years due to rising flood risk and insurance withdrawal. The ABI recorded a record £585 million in home weather-damage claims in 2024, and the average cost of repairing a single flooded home is £33,600.

The proposed Berkeley Homes site sits on Weald Clay and has a documented local history of surface-water flooding. Constructing 1,000 homes here — all permanently excluded from Flood Re, all facing increasing climate-driven flood risk, and with no confirmed long-term insurance availability — creates a foreseeable and serious risk that these properties will be uninsurable and therefore unmortgageable.

A development that future residents cannot insure, cannot mortgage, and may struggle to sell does not constitute sustainable housing delivery. It represents a long-term financial risk to households and to the wider community.

In the absence of clear, independently verified evidence demonstrating that these homes will remain insurable and mortgageable over their lifetime, the application fails to meet national and local planning requirements relating to flood risk, housing soundness, and long-term community wellbeing.

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.

2E: Weald Clay causes structural damage through subsidence and heave — making homes harder to insure, harder to sell, and increasingly costly to maintain as the climate worsens

BGS classification: Weald Clay is specifically named by the British Geological Survey as one of the UK's highest shrink-swell risk soils — alongside London Clay and Gault Clay

Costliest UK geohazard: Shrink-swell clay damage costs the UK economy over £400 million every year, according to the BGS — the single most damaging geohazard in Britain

ABI subsidence claims: Over 10,000 households made subsidence claims worth £64 million in just one quarter (July–September 2018) — a 350% jump on the previous year, driven by clay soil drying in the summer heatwave

Annual claims scale: Between 28,000 and 55,000 domestic subsidence claims are made every year in the UK, costing insurers £140–£400 million annually

2025 claims: In the first half of 2025 alone, insurers paid £153 million across around 9,000 households — average payout £17,264 — after an exceptionally warm spring

Ancient woodland risk factor: The site is immediately adjacent to two ancient woodlands. Tree roots actively dry out clay soils, dramatically increasing shrink-swell movement under nearby foundations.

Climate trajectory: The BGS GeoClimateUKCP18 model projects significantly increased clay shrinkage risk across Sussex by 2030–2035, driven by more frequent droughts

Insurance consequence: A property with a history of subsidence claims faces dramatically higher premiums, reduced mortgage availability, and reduced resale value.

I am objecting to the Berkeley Homes proposal to construct 1,000 dwellings northwest of Southwater on the grounds that the site presents a high and well-documented shrink–swell (subsidence) risk, with significant implications for structural safety, insurance availability, mortgage lending, and long-term property value.

The British Geological Survey (BGS) identifies Weald Clay as one of the highest shrink–swell risk soils in Britain, alongside London Clay and Gault Clay. Shrink–swell describes the cyclical process by which clay soils contract and crack during dry periods and then expand when re-wetted. For buildings, this results in repeated ground movement that can lift, distort, and crack foundations, walls, floors, and drainage systems. The BGS identifies shrink–swell as the single costliest geohazard in the UK, causing over £400 million of damage annually.

Insurance data demonstrates the severity and increasing frequency of this risk. In summer 2018, the Association of British Insurers (ABI) recorded more than 10,000 subsidence claims worth £64 million in a single quarter — a 350% increase driven by clay soils drying out. In the first half of 2025 alone, insurers paid £153 million across approximately 9,000 households following a warm spring, averaging £17,264 per claim. Nationally, between 28,000 and 55,000 domestic subsidence claims are made each year, costing insurers up to £400 million. South-east England, including West Sussex, is the highest-risk region.

At this specific site, the risk is further heightened by the immediate proximity of Courtland Wood and Smith’s Copse. Tree roots extract moisture from clay soils well beyond the woodland boundary, intensifying shrinkage and increasing the likelihood of foundation movement. Buildings located close to large, established trees on shrinkable clay face materially higher structural risk. Ancient woodland trees cannot be pruned or removed to mitigate this risk: their root systems extend far beyond the canopy, and severe pruning risks killing trees that are legally protected and irreplaceable.

Climate change is projected to exacerbate this hazard significantly. The BGS GeoClimateUKCP18 model forecasts a substantial increase in clay shrinkage risk across Sussex between 2025 and 2035 as droughts become more frequent and more severe. A home built on this site today would face a structural environment expected to deteriorate throughout its lifetime.

Properties with a history of subsidence claims face higher insurance premiums, restricted mortgage terms, and reduced resale value. Insurers and lenders are becoming increasingly unwilling to take on this risk, particularly in areas where shrink–swell is both foreseeable and severe.

In the absence of a robust, independently verified geotechnical and hydrological assessment demonstrating that the proposed development can be safely constructed and insured over its lifetime, the application fails to meet national and local planning requirements relating to land stability, climate resilience, and long-term housing soundness.

I ask that the Berkeley Homes 1,000-home proposal be refused until an independent structural and geotechnical assessment specifically addressing the shrink -swell risk of Weald Clay at this location. -including the influence of adjacent ancient woodland tree roots and projected climate impacts to 2070 – has been published and independently peer reviewed.

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

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

Broadacres development: ~350 homes — already under construction

Horsham Golf Club site: ~800 homes — planning permission already granted

Berkeley Homes (proposed): 1,000 homes

Cumulative total: ~2,150 new homes — none assessed together

Previous application: Berkeley Homes' 1,500-home application (DC/22/1916) withdrawn Feb 2023 partly due to cumulative infrastructure concerns — which have since got worse, not better.

I am objecting to the Berkeley Homes proposal to construct 1,000 dwellings northwest of Southwater on the grounds that no proper assessment has been undertaken of the cumulative impact of all the growth Southwater is already committed to absorb.

Southwater is not starting from a baseline of zero development. Approximately 350 homes are currently under construction at Broadacres, and a further 800 homes have planning permission at the Horsham Golf Club site. This represents around 1,150 new dwellings already committed before any Berkeley Homes development is taken into account. Adding the 1,000 homes now proposed would bring the total to more than 2,150 new dwellings — more than doubling the number of households in a village whose roads, schools, healthcare provision and wastewater infrastructure were not designed to accommodate growth on this scale.

No assessment has been carried out of the combined impact of all this development on Southwater's infrastructure. Berkeley Homes has assessed only its own proposal in isolation, disregarding the 1,150 homes already in the pipeline. This approach does not provide a sound or proportionate basis for decision-making.

The timescale of the proposed development compounds this concern. Based on Berkeley Homes' typical build-out rate of 50–60 dwellings per year, and with an estimated 200 additional units yet to be completed elsewhere, construction on this site would extend over approximately 20 years. A planning authority is required to demonstrate only a five-year housing land supply. Approving this application would, in effect, allocate a 20-year supply to a single developer in a single location. Locking up this land for two decades due to one developer's build-out capacity is not an efficient or justified use of the planning system.

When Berkeley Homes applied for 1,500 homes on this same site in 2022, Horsham District Council's planning officers identified cumulative infrastructure impact as one of the principal reasons the application was unacceptable. That application was withdrawn in February 2023. Since then, the infrastructure position has worsened, not improved, yet Berkeley Homes now seeks permission for 1,000 homes without providing any enhanced or updated evidence.

In the absence of a full, independent cumulative infrastructure assessment covering all committed and proposed development in Southwater, the application cannot be considered sound. I therefore request that the Berkeley Homes proposal be refused until such an assessment has been completed, published, and subjected to proper scrutiny.

3B: GP and NHS capacity is already overstretched — no plan exists to expand health infrastructure and staffing

Current position: Southwater GP surgeries are already at or beyond capacity — patients face significant waits for appointments

Ambulance response: Southwater has some of the poorest ambulance response times in Sussex due to its distance from hospitals

NHS confirmation: NHS England has not confirmed that primary care capacity can be delivered for 2,150+ additional homes

Infrastructure plan: No funded, legally secured plan for GP expansion or new health facilities has been provided

I am objecting to the Berkeley Homes proposal to construct 1,000 dwellings northwest of Southwater on the grounds that local NHS and healthcare infrastructure is already operating beyond capacity, and no credible or secured plan exists to expand it.

My family is one of many in Southwater that has already experienced significant difficulty and delay in accessing primary healthcare. GP surgeries serving the village are under sustained pressure from the existing population, even before accounting for the approximately 1,150 new homes already approved and under construction. The issue is not solely one of physical space: the local practice appears to have room to accommodate additional GPs but has been unable to recruit them. Approving a further 1,000 homes does nothing to resolve a staffing shortage that the NHS itself has been unable to address. Access to NHS dentistry is similarly constrained, with many residents unable to register with any NHS dentist in the area.

Southwater is also geographically distant from the main hospitals serving Horsham and the wider region. [REDACTED]

[REDACTED] the response times for this area are among the slowest in Sussex. Adding more than 2,000 additional homes will place further pressure on emergency response capacity, with no evidence that this can be mitigated. This is a horrifying prospect for families facing ongoing medical emergencies.

NHS England has not confirmed that primary healthcare capacity exists, can be expanded, or can be funded to support the population arising from this development. There is no costed, legally secured plan for a new GP surgery, nor for the expansion of existing facilities. Statements that the developer “will work with the NHS to address this” do not constitute a deliverable or enforceable plan.

Southwater residents have previously been promised community infrastructure as part of earlier large developments, only for delivery to be delayed or not materialise at all. Given this history, it is not reasonable or proportionate to approve a further 1,000 homes on the basis of aspirational assurances rather than secured commitments.

In the absence of a robust, funded, and legally secured plan demonstrating that NHS and healthcare capacity will be expanded to meet the needs of the additional population, the application fails to meet national and local planning requirements relating to healthcare provision, community wellbeing, and sustainable development.

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.

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

Current failures: Southwater residents have experienced sewage overflows and inadequate sewage provision for years, unresolved

Southern Water record: Fined £90 million in 2020 after pleading guilty to 51 offences of deliberate sewage dumping

Bill increases: Ofwat requires Southern Water to raise bills by up to 44% by 2030 — Southern Water is appealing this

Uncertainty: Southern Water's appeal against investment requirements creates serious doubt over whether promised upgrades will be delivered.

I am objecting to the Berkeley Homes proposal to construct 1,000 dwellings northwest of Southwater on the grounds that the existing sewage and wastewater system is already failing residents, and Southern Water has provided no credible, secured or timely plan to ensure that the additional load from this development can be safely accommodated.

Residents in parts of Southwater have experienced sewage overflow problems for many years — issues that Southern Water has repeatedly failed to resolve. Adding 1,000 further dwellings to an already strained network, without a confirmed and fully funded upgrade, would be irresponsible and contrary to the principles of sustainable development.

A new and serious concern has now emerged. Planning application DC/26/0366 confirms that foul sewage from the proposed development would be treated at Barns Green Wastewater Treatment Works. Southern Water's own documentation (Flood Risk Assessment and Outline Drainage Strategy, 27/02/2026, para. 11.1.3; Annex H) states that while it intends to increase capacity at Barns Green, this upgrade will take a minimum of 24 months — and potentially longer. Granting permission now would place the Barns Green works under significant additional load before any upgrade is operational, creating a foreseeable and material risk of untreated sewage being discharged into local watercourses.

Southern Water's operational and regulatory history provides no reassurance that these upgrades will be delivered on time, or at all. In 2020, the company pleaded guilty to 51 criminal offences relating to the deliberate discharge of untreated sewage and was fined £90 million — the largest case of its kind ever recorded by the Environment Agency. Its financial conduct since then raises further concern. Ofwat has determined that Southern Water must invest at a level requiring customer bills to rise by 44% by 2030; Southern Water is actively appealing this ruling. This appeal indicates resistance to the very investment its regulator considers essential.

There is no credible basis for assuming that a private-equity-owned company challenging mandatory investment requirements will voluntarily fund the future-proofed infrastructure capacity required for 1,000 additional homes.

Planning permission must not be granted on the assumption that a company with this track record will deliver the necessary infrastructure. Southern Water must provide a formal, legally binding, and independently verified commitment to expand sewage and wastewater treatment capacity before any development is permitted. The applicant's own drainage strategy — acknowledging a minimum 24-month upgrade timeline — makes this requirement explicit.

In the absence of a secured and enforceable commitment from Southern Water to upgrade sewage and wastewater treatment capacity for Southwater, without displacing impacts onto neighbouring villages, the application fails to meet national and local planning requirements relating to wastewater infrastructure, environmental protection, and public health. I therefore request that the Berkeley Homes proposal be refused until such commitments have been formally confirmed, independently verified, and legally secured.

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

Water neutrality lifted: 31 October 2025 — but this removed a legal planning condition, not the underlying physical water shortage

Sussex North Water Supply Zone: Already identified as a water-stressed area — cumulative growth risks Southern Water's ability to maintain abstraction at Hardham.

2025 drought: Hottest summer since records began in 1884; preceding spring the driest in 132 years — hosepipe bans imposed across the region

National deficit: England faces a projected shortfall of nearly 5 billion litres of water per day by 2050 — Sussex is among the worst-affected areas.

Broadacres evidence: Residents on the recently built Berkeley Homes Broadacres estate in Southwater have already removed water-saving restrictors because inadequate water volume reached their homes.

Forecast gap: HDC's own water demand calculations are misaligned with Southern Water's published consumption figures by 21%

I am objecting to the Berkeley Homes proposal to construct 1,000 dwellings northwest of Southwater on the grounds that water scarcity remains a significant and unresolved infrastructure constraint, and the recent removal of the formal water-neutrality planning requirement has not altered the underlying physical limitations of the local water supply.

In October 2025, Horsham District Council announced that the “water neutrality” requirement — which had paused major housing development in this area for several years — had been lifted. This administrative change has been used to imply that water-supply constraints have been resolved. They have not. Removing a planning rule does not create additional water resources; it merely – and cynically – removes the mechanism that previously required the issue to be addressed before development could proceed.

The Sussex North Water Supply Zone, which serves Southwater, is formally designated as a water-stressed area. Southern Water has itself acknowledged that cumulative housing growth within this zone poses risks to its ability to sustainably manage groundwater abstraction at Hardham. The underlying constraint therefore remains unchanged; it has simply been set aside procedurally. This is an outrageous attempt to hood-wink the public.

Recent climatic conditions reinforce the seriousness of this issue. The 2025 drought was the worst in more than 130 years. Hosepipe bans were imposed, and the Environment Agency confirmed that England required a full winter of above-average rainfall to recover — which did not occur. Nationally, England faces a projected water deficit of nearly 5 billion litres per day by 2050, with Sussex among the most affected regions.

There is also direct local evidence that water supply to Southwater is already under strain. Residents on the recently built Berkeley Homes Broadacres estate — located on the same side of the village as the proposed development — have reported having to remove water-saving flow restrictors from taps and showers because water pressure and volume were insufficient for basic daily needs. This is occurring now, before the addition of 1,000 further dwellings.

Furthermore, Horsham District Council's own water-demand monitoring is misaligned with Southern Water's published consumption figures by approximately 21%. This discrepancy means that the planning assumptions currently being used to argue that water supply is adequate are themselves unreliable.

In the absence of a robust, independent hydrogeological assessment — not a self-serving, self-assessment by Southern Water — confirming that potable water supply within the Sussex North Water Supply Zone is sufficient and sustainable for an additional 1,000 homes in Southwater under all weather conditions, including drought years, the application cannot be considered sound.

I therefore request that the Berkeley Homes proposal be refused until such an independent assessment has been completed, published, and subjected to proper scrutiny.

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

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

A24 status: Already at or beyond capacity at peak times — confirmed in HDC's own evidence base

Hop Oast roundabout: Already recorded at capacity by HDC — without any further Berkeley Homes homes being built

Two Mile Ash Road is already dangerous for pedestrians, horse riders and cyclists

Combined pressure: 800 homes at Golf Club site (already approved) + 1,000 Berkeley Homes = 1,800 new homes all feeding the same junction

Previous objection: West Sussex County Council Highways raised unresolved objections on traffic grounds to Berkeley Homes' previous 1,500-home application

I am objecting to the Berkeley Homes proposal to construct 1,000 dwellings northwest of Southwater on the grounds that the A24 corridor and the local road network are already operating at or beyond capacity, and no viable mitigation has been demonstrated to accommodate the additional traffic this development would generate.

The A24 is the primary route in and out of Southwater for the vast majority of journeys. Horsham District Council's own evidence base confirms that the A24 is already at, or exceeding, capacity during peak periods. This is not a matter of resident perception but of documented highway performance.

The Hop Oast roundabout — one of the principal access points for the proposed development — is already operating at capacity according to the Council's figures, even before a single dwelling from this proposal is built. Adding 1,000 new homes, alongside the 800 already

approved at the Horsham Golf Club site, would result in approximately 1,800 additional car-dependent households using this single junction.

Two Mile Ash Road is already dangerous, with vehicle use having increased massively in the past twenty years. There are blind corners and no footpaths. Pedestrians frequently have to step onto the steep banks and grass verges to avoid vehicles travelling at speed and without regard for pedestrians. The inevitable increase in road traffic would exacerbate these risks to life, not only for pedestrians, but horse riders and the many cyclists who use this country road.

The development would significantly increase car dependency within Southwater. An additional 1,000 homes is expected to generate approximately 1,500 additional vehicles within the village, in addition to traffic attracted from outside Southwater for school drop-off and pick-up associated with the new school proposed as part of the development. The traffic impact is therefore not limited to residential trips but includes school-related movements that will further intensify peak-time congestion.

When Berkeley Homes previously applied for 1,500 homes on this same site, West Sussex County Council Highways raised serious and unresolved objections relating to traffic and road capacity. The application was subsequently withdrawn. Those concerns have not been addressed, and traffic conditions have deteriorated since that time.

Proposed interventions such as traffic signals or revised road markings at already-overloaded junctions do not increase underlying capacity. They merely regulate the flow of congestion. With the A24 and local junctions already operating at or beyond their limits, such measures would simply formalise delays and create bottlenecks both within the village and on the A24, resulting in gridlock for existing and future residents.

In the absence of a robust, independently verified transport assessment demonstrating that the A24 corridor and local road network can safely and sustainably accommodate the traffic generated by this development — and in the absence of any credible mitigation strategy — the application fails to meet national and local planning requirements relating to transport capacity, highway safety, and sustainable development.

I therefore request that the Berkeley Homes 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.

4B: Southwater is a car-dependent location — every new resident will need a car for every journey

Railway station: None in Southwater — Christ's Hospital station is remote, with infrequent service, and has no meaningful parking

Bus service: Infrequent and does not serve new residential estates

A24 barrier: The A24 dual carriageway and railway physically cut Southwater off from Horsham

town centre and jobs — no safe crossing exists for pedestrians or cyclists

Employment: Very limited employment in Southwater — the majority of working residents commute out by car

Objection: Inherently Car-Dependent Location With No Credible Prospect of Sustainable Travel

I am objecting to the Berkeley Homes proposal to construct 1,000 dwellings northwest of Southwater on the grounds that the site is inherently car-dependent by geography, with no realistic or deliverable prospect of providing genuinely sustainable travel alternatives.

Southwater has no railway station. The nearest station, Christ's Hospital, is remote from the village, is served by infrequent trains, and has inadequate car-parking provision. Bus services are limited and do not reliably serve newer housing estates. There is no viable cycling or walking route across either the A24 dual carriageway or the railway line, both of which form hard physical barriers separating Southwater from Horsham town centre and the district's main employment areas.

The consequence is that residents of new developments in Southwater will require a car for almost all significant journeys. This is not a behavioural preference but a geographical reality. Horsham District Council's own Local Cycling and Walking Infrastructure Plan (2020) confirms that the A24 and the railway line are substantial physical barriers that cannot realistically be crossed on foot or by bicycle.

Southwater has limited local employment opportunities. Most working-age residents commute elsewhere, predominantly to Horsham, Crawley, Gatwick, or further afield — all journeys that will be made by car. Adding 1,000 homes in a location with no viable alternatives to private-car travel is the opposite of the sustainable development required by national planning policy.

The question of where new residents will access services and schools also requires scrutiny. Berkeley Homes' supporting documents suggest a school linkage with the Horsham Golf Club development, but this has not been clearly evidenced. It is also unclear whether residents of the Golf Club development will rely on Southwater for services, or whether both developments will in practice look to Horsham for schools, healthcare, employment and retail. If the latter is the case, it further undermines the justification for locating large-scale development here: residents will not be served by Southwater's limited facilities but will instead add to traffic pressure on already-congested routes into Horsham.

The applicant refers to aspirational improvements to bus services and cycle routes. However, these proposals are not funded, not contracted, and not enforceable. Aspirations are not infrastructure, and they do not constitute mitigation.

In the absence of a credible, deliverable, and enforceable strategy to provide sustainable travel alternatives — and given the site's inherent geographical constraints — the proposal fails to meet national and local planning requirements relating to sustainable transport, climate objectives, and responsible site selection.

I therefore request that the Berkeley Homes proposal be refused on the grounds that the site is inherently car-dependent by geography, with no credible prospect of delivering genuinely sustainable travel alternatives.

4C: The secondary school traffic assessment is fundamentally flawed and creates a child safety risk

Berkeley Homes claim: The proposed secondary school will generate little or no additional traffic — because pupils will walk or cycle

Problem: The A24 dual carriageway lies between the school and the Horsham Golf Club development from which many pupils would come — there is no safe pedestrian or cycle crossing

Safety risk: Children attempting to cross the A24 at an informal point face serious risk of road accident or death

Required solution: A grade-separated pedestrian/cycle crossing (underpass or footbridge) — significant capital cost that Berkeley Homes has not committed to fund

Objection: Inaccurate School Traffic Assessment and Unresolved Child Safety Risks

I am objecting to the Berkeley Homes proposal to construct 1,000 dwellings northwest of Southwater on the grounds that the transport assessment for the proposed secondary school is fundamentally flawed and fails to address a serious and foreseeable child-safety risk.

The applicant's transport assessment asserts that the new secondary school would generate minimal additional traffic, on the basis that most pupils would walk or cycle. This conclusion is not credible. A new secondary school south of Horsham would draw pupils from a wide catchment 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 high-speed, high-volume trunk road, and there is no safe pedestrian or cycle crossing at a location suitable for school-age children.

In the absence of a safe crossing, the assessment's projections for walking and cycling trips are invalid. Any child attempting to cross the A24 at an informal or unsignalized point would be exposed to a serious risk of collision. This is not a minor detail that can be resolved at a later design stage; it is a fundamental safety constraint that must be addressed before planning permission is granted.

The only adequate mitigation is a grade-separated crossing — either an underpass or a footbridge — designed to safely accommodate large numbers of pupils at peak times. This is substantial and costly infrastructure. Berkeley Homes has not committed to fund, design, or

deliver such a crossing, nor has it demonstrated that it is feasible within the scheme's parameters.

Without a secured, fully funded, and enforceable commitment to provide a grade-separated pedestrian and cycle crossing of the A24, the proposed school cannot be safely accessed by non-car modes. As a result, the transport assessment significantly underestimates traffic generation, and the development fails to meet national and local planning requirements relating to highway safety, sustainable travel, and responsible site planning.

I therefore request that the Berkeley Homes proposal be refused unless and until the applicant has committed in writing to fund and deliver a fully safe, grade-separated pedestrian and cycle crossing of the A24 as a condition of any permission.

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

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

Woodland at risk: Courtland Wood and Smith's Copse — both designated ancient woodlands, immediately adjacent to the site

Legal status: Ancient woodland has near-absolute protection in national planning law — it cannot be compensated for or replaced

Planning rule: Development that would damage ancient woodland must be refused unless wholly exceptional circumstances exist (NPPF Para 186c)

Missing evidence: No independent hydrological assessment of the impact on these woodlands has been submitted by Berkeley Homes

Objection: Risk of Irreversible Harm to Ancient Woodland Due to Hydrological Impacts

I am objecting to the Berkeley Homes proposal to construct 1,000 dwellings northwest of Southwater on the grounds that the development poses a serious and irreversible risk to two areas of ancient woodland.

Courtland Wood and Smith's Copse lie immediately adjacent to the proposed development site. Both are designated ancient woodlands — habitats that have existed continuously for more than 400 years. Under national planning policy, ancient woodland is afforded near-absolute protection. It cannot be recreated, compensated for, or replaced. Once damaged, it is permanently lost.

The risk to these woodlands is not limited to direct physical encroachment. The extensive drainage engineering required on this Weald Clay site — including large attenuation ponds, underground storage tanks, and engineered drainage channels — would alter the movement of water through the soil across a wide surrounding area. Changes to groundwater levels and soil-moisture regimes can damage or kill ancient woodland trees through their root systems

without any physical intrusion into the woodland itself. This mechanism of harm is well-documented and recognised in ecological and hydrological guidance.

Berkeley Homes has not provided any independent assessment of the specific hydrological risks to Courtland Wood and Smith's Copse. Reliance on a developer-commissioned consultant report is not adequate or proportionate for a risk that is both permanent and irreversible.

In the absence of a fully independent, peer-reviewed hydrological assessment demonstrating that the proposed development will not adversely affect these irreplaceable habitats, the application fails to meet national planning requirements relating to ancient woodland protection.

I therefore request that the Berkeley Homes proposal be refused until such an assessment has been completed, published, and subjected to proper scrutiny.

5B: Wildlife surveys are incomplete — Berkeley Homes is attempting to survey after approval, not before

Requirement: Full wildlife surveys must be completed and assessed before planning permission is granted — not after

[REDACTED]

Berkeley Homes approach: Surveys to be completed post-allocation — the law does not permit this approach

[REDACTED]

Objection: Incomplete Wildlife Surveys and Improper Deferral of Mandatory Ecological Assessment

I am objecting to the Berkeley Homes proposal to construct 1,000 dwellings northwest of Southwater on the grounds that the wildlife impact surveys are incomplete, and the applicant is seeking to defer essential ecological assessment until after approval — a practice that is not permitted under planning law.

Planning law and established case law are clear: the impact on protected species must be properly assessed before planning permission is granted. Ecological surveys cannot be deferred to a later stage. This requirement is a fundamental safeguard designed to prevent irreversible harm to protected wildlife. It ensures that decision-makers understand the ecological consequences of a proposal before consent is issued, not after damage has occurred.

There is established [REDACTED] wildlife using long-standing foraging routes across this land. [REDACTED]

[REDACTED] A development

of 1,000 homes would cause major disruption to these routes and habitats, yet this impact has not been adequately assessed.

Berkeley Homes has argued that full ecological surveys should be carried out only after the site 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 — before irreversible harm occurs.

The scale and diversity of wildlife using this land — [REDACTED] — has not been assessed in any rigorous or independent manner. This represents a significant and unresolved gap in the evidence base.

In the absence of complete, independently verified ecological surveys covering the entire site, the application fails to meet national and local planning requirements relating to biodiversity protection, species safeguarding, and lawful decision-making.

I therefore request that the Berkeley Homes proposal be refused until fully independent, comprehensive wildlife surveys have been completed, published, and independently assessed.

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

Legal requirement: All major developments must achieve a minimum 10% Biodiversity Net Gain

(Environment Act 2021)

Challenge: Weald Clay sites have limited scope for on-site habitat creation due to drainage engineering constraints

Risk: Berkeley Homes may rely on purchasing off-site 'biodiversity credits' — meaning local wildlife gains nothing

Question unanswered: Will the 10% gain be delivered near the development where residents can benefit, or purchased remotely?

Objection: Failure to Demonstrate the Legally Required 10% Biodiversity Net Gain

I am objecting to the Berkeley Homes proposal to construct 1,000 dwellings northwest of Southwater on the grounds that the applicant has not credibly demonstrated compliance with the statutory requirement for a minimum 10% biodiversity net gain.

Since 2024, all major planning applications must deliver at least a 10% measurable net gain in biodiversity as a legal condition of planning permission. This requirement is mandatory. Berkeley Homes must therefore demonstrate — prior to permission being granted — that biodiversity will increase as a direct result of the development.

Achieving meaningful biodiversity gain on a Weald Clay site is particularly challenging. The same ground conditions that create severe drainage constraints also limit the range of habitats

that can be successfully established or enhanced. In addition, the significant land take required for attenuation ponds, underground storage, and other drainage infrastructure reduces the space available for genuine habitat creation.

There is a material risk that Berkeley Homes will seek to meet the 10% requirement through the purchase of off-site “biodiversity credits” relating to habitat improvements in locations entirely unrelated to Southwater. This would result in the local area around the development receiving little or no ecological enhancement, while the paperwork shows a net gain achieved on land far from the community affected by the development. Such an approach would undermine the purpose of biodiversity net gain, which is intended to secure real, local ecological improvement.

Southwater residents are entitled to clarity about whether the legally required biodiversity gain will be delivered on or near the development site, where it can provide tangible ecological and community benefit.

In the absence of a credible, independently verified biodiversity net gain strategy demonstrating genuine local ecological improvement — rather than reliance on remote offsetting — the application fails to meet national planning requirements.

I therefore request that the Berkeley Homes proposal be refused until a robust, independently assessed biodiversity net gain strategy has been submitted, demonstrating how the legally required 10% net gain will be achieved locally and sustainably.

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

6A: At 1,000 homes, this turns a village into a town, which no one wants

Scale of change: 1,000 new homes would more than double the housing stock on the western side of the village

Site size: 141 hectares of open farmland — the equivalent of about 200 football pitches — built over permanently

Neighbourhood Plan: Requires development to respect the existing landscape character of the village and avoid coalescence with surrounding rural areas

Irreversibility: Once farmland is built on, it cannot ever be returned to countryside

Objection: Permanent Harm to the Landscape Character and Rural Setting of Southwater

I am objecting to the Berkeley Homes proposal to construct 1,000 dwellings northwest of Southwater on the grounds that development at this scale would fundamentally and permanently destroy the character of the village and its rural setting.

Southwater is a village, and residents have chosen to live in a village environment. The 141-hectare site to the northwest — approximately 200 football pitches in area — currently

provides a natural transition between the settlement edge and the open Low Weald countryside. Once developed, this countryside buffer would be permanently lost.

A development of 1,000 homes is not a modest extension. When combined with the 800 homes already approved at the Horsham Golf Club site and the 350 homes at Broadacres, Southwater would be accommodating more than 2,000 additional dwellings within a single generation. This level of growth would transform a large village into a small town, which no one wants. The scale of the proposed development far exceeds anything the settlement was designed to absorb. It is not an extension of the existing village; it is, in effect, a new settlement imposed upon it.

The Southwater Neighbourhood Plan, endorsed by residents through referendum, requires that development avoids coalescence with neighbouring settlements and respects the existing landscape character of the village. This proposal conflicts with those principles. It would significantly erode the rural setting of Southwater and increase the risk of coalescence with adjacent areas.

Berkeley Homes has not demonstrated meaningful engagement 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 codes, or the Southwater Neighbourhood Plan's own design principles. The planning authority should satisfy itself that such a framework exists and that the applicant has demonstrated compliance with it. Without this, there is a substantial risk that the development will degrade the character and coherence of the settlement rather than contribute positively to it.

No cumulative landscape assessment has been undertaken that considers the Berkeley Homes proposal alongside the Golf Club and Broadacres developments. The combined visual and landscape impact on Southwater — including the risk of coalescence — has therefore not been properly assessed.

In the absence of a robust, cumulative, and independently verified landscape assessment demonstrating that the rural setting and character of Southwater will be protected, the application fails to meet national and local planning requirements relating to landscape protection, settlement identity, and sustainable development.

I therefore request that the Berkeley Homes proposal be refused on the grounds that it would cause permanent and unacceptable harm to the landscape character and rural setting of Southwater village.

6B: The development would begin to merge Southwater with Christ's Hospital — removing the gap between them

Neighbourhood Plan policy: Requires meaningful gaps to be maintained between Southwater and adjacent settlements

Settlement at risk: Christ's Hospital — immediately adjacent to parts of the proposed development site

Planning term: 'Coalescence' — the merging of two distinct settlements into one — is a recognised planning harm

No cumulative assessment: No landscape assessment of the combined effect of all three Southwater developments has been carried out

Objection: Loss of Settlement Separation and Increased Risk of Coalescence with Christ's Hospital

I am objecting to the Berkeley Homes proposal to construct 1,000 dwellings northwest of Southwater on the grounds that it would erode the physical separation between Southwater and Christ's Hospital — a separation that the Southwater Neighbourhood Plan explicitly requires to be maintained.

Southwater and Christ's Hospital are distinct settlements with their own identities, histories, and community structures. The open land between them — much of which lies within or adjacent to the Berkeley Homes development area — currently provides the physical gap that keeps these settlements separate. Once this land is developed, that gap will be permanently reduced or lost.

The Southwater Neighbourhood Plan, endorsed by residents through referendum, contains a clear policy requirement to maintain meaningful gaps between Southwater and neighbouring settlements in order to prevent coalescence. This is a well-established planning principle designed to protect settlement identity, landscape character, and community distinctiveness. The Berkeley Homes proposal directly conflicts with this requirement.

Two other major developments — the Horsham Golf Club site and Broadacres — are already extending the built footprint of Southwater. Yet no cumulative landscape assessment has been undertaken to evaluate what all three schemes together would mean for the separation between Southwater and Christ's Hospital. The combined impact on settlement identity and landscape character has therefore never been properly assessed.

The cumulative loss of separation has not been addressed in any planning document submitted by Berkeley Homes. This omission is significant, given the scale of development proposed and the clear policy requirement to maintain settlement gaps.

In the absence of a robust, independent cumulative landscape assessment demonstrating that meaningful separation between Southwater and Christ's Hospital can be maintained, the application fails to meet national and local planning requirements relating to landscape protection, settlement identity, and sustainable development.

I therefore request that the Berkeley Homes proposal be refused until such an assessment has been completed, published, and subjected to proper scrutiny.

6C: Southwater sits on a flat open plateau — 1,000 homes will be visible for miles and will permanently alter the skyline

Topography: Southwater sits on a relatively flat Low Weald plateau with open, long-distance views

across the surrounding countryside

Visual impact: Continuous residential development along the village edge will be visible from a wide

area, including across protected countryside

Missing assessment: No combined Landscape and Visual Impact Assessment (LVIA) covering the

Berkeley, Golf Club, and Broadacres schemes together has been produced

Neighbourhood Plan: Specifically requires that development is sympathetic to the village's landscape setting and open countryside character

Objection: Failure to Provide a Proper Cumulative Landscape and Visual Impact Assessment
I am objecting to the Berkeley Homes proposal to construct 1,000 dwellings northwest of Southwater on the grounds that the visual impact on the surrounding landscape has not been properly or honestly assessed.

Southwater sits on a gently elevated, open plateau. Unlike settlements screened by valleys or woodland, the character of Southwater's setting is defined by its wide, open views across the Low Weald countryside. This openness is a defining feature of the village's identity — the sense of living in a rural settlement rather than in continuous suburban sprawl.

Constructing 1,000 homes along the western edge of the village would fundamentally alter what is visible from the surrounding countryside. A continuous line of rooftops, streets and built form extending across the current farmland would be visible over long distances, permanently changing the character of the landscape.

There is also a significant cumulative dimension. The Horsham Golf Club development to the north and Broadacres to the east are both expanding Southwater's built footprint at the same time. Yet no Landscape and Visual Impact Assessment (LVIA) has been undertaken that considers all three developments together. Without such an assessment, the true combined impact on views, landscape character, and settlement form has not been understood or presented.

This is not a matter of subjective preference. Protecting landscape character is a specific requirement of national planning policy and of the Southwater Neighbourhood Plan. A proper cumulative LVIA is therefore essential to lawful and informed decision-making.

In the absence of a full, independently conducted cumulative Landscape and Visual Impact Assessment covering all three concurrent Southwater developments, the application fails to meet national and local planning requirements relating to landscape protection, settlement identity, and sustainable development.

I therefore request that the Berkeley Homes proposal be refused until such an assessment has been completed, published, and subjected to proper scrutiny.

7. The 'Affordable' Homes Are Not Affordable to Local People and Local Need Has Not Been Proven

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

Local median house price: Approximately £430,000

Local median earnings: Approximately £36,000 per year

'Affordable' definition: Up to 80% of market value — meaning £344,000 for an 'affordable' home
here

Mortgage needed: Based on 4x salary, a local worker on median wages can borrow approximately
£144,000 — less than half an 'affordable' home

HDC policy requirement: 40% of homes must be affordable (70% affordable rent / 30% shared
ownership)

Objection: Failure to Demonstrate That the Proposed 'Affordable' Housing Is Affordable to Local People

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

Under the planning system, “affordable housing” is defined as housing priced at up to 80% of open-market value. In Southwater, where the median house price is approximately £430,000, an “affordable” home would cost around £344,000. Berkeley Homes does not appear to be proposing any social rented housing — 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 typically borrow around £144,000 on a standard mortgage — 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 effectively meaningless in this part of West Sussex.

Horsham District Council’s policy requires that 40% of homes in major developments be genuinely affordable, with 70% provided 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, the applicant has not demonstrated that any registered provider has committed to taking on the affordable housing element of this development. Without such a 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 located in places with good access to employment, schools, services and public transport. Southwater currently lacks all of these at the scale this development would require. 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 failure of planning policy and an unacceptable outcome for the people placed there.

In the absence of independently verified evidence demonstrating that the proposed affordable homes will be genuinely accessible to people on local average wages, the application fails to meet national and local planning requirements relating to affordable housing delivery, social equity, and sustainable community development.

I therefore request that the Berkeley Homes proposal be refused until Berkeley Homes has demonstrated, with independently verified evidence, that the affordable homes proposed will be genuinely accessible to people on local average wages in Southwater.

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

HDC requirement: 40% affordable homes on all major developments

Developer loophole: Developers can submit a 'viability assessment' claiming they cannot afford to deliver 40% — and negotiate it down

Problem: These assessments are typically prepared by the developer's own consultants, with figures the developer controls

Risk: Previous large developments in the area delivered significantly fewer affordable homes than originally promised

Berkeley Homes history: Has previously marketed Southwater properties to overseas investors — raising questions about whether local need is the priority

Objection: Lack of Independent Oversight and Risk of Reduced Affordable Housing Delivery
I am objecting to the Berkeley Homes proposal to construct 1,000 dwellings northwest of Southwater on the grounds that the mechanism for delivering affordable housing can be legally used to reduce the number of affordable homes provided — with no meaningful independent oversight.

Horsham District Council's policy requires that 40% of homes in major developments be affordable. However, developers are permitted to submit a "viability assessment" — a financial model claiming that the development is not profitable enough to deliver the required 40% — and negotiate the obligation down.

These viability assessments are almost always prepared by consultants appointed and paid by the developer. The key figures they contain — including land values, 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, seen repeatedly across the country, 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. The risk of this happening here is significant.

It is also relevant 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 aimed at an investor market.

Given these concerns, it is essential that any affordable housing commitment is independently verified. Without independent scrutiny, there is no assurance that the affordable housing promised will actually be delivered — or that it will meet the needs of local people.

In the absence of an independently verified viability assessment, undertaken by a surveyor appointed by the Council rather than by Berkeley Homes, and without a legally fixed commitment to the number of genuinely affordable homes to be delivered, the application fails to meet national and local planning requirements relating to affordable housing provision, transparency, and public accountability.

I therefore request that the Berkeley Homes proposal be refused until the affordable housing commitment has been independently verified by a Council-appointed surveyor and the number of affordable homes is legally secured as a condition of any permission.

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

Key question: Has it been proven that there is a genuine need for 1,000 homes specifically in Southwater? No.

Demand drivers: Housing pressure in this area largely originates from Gatwick, Crawley, and coastal overspill — not from Southwater itself

Employment mismatch: Southwater has very limited local employment — HDC's own economic strategy identifies North Horsham and the Gatwick Diamond as the growth corridor, not Southwater.

Planning rule: Development must address genuine, locally identified housing need — not simply meet a numerical target.

Objection: Failure to Demonstrate Genuine Local Housing Need for 1,000 Homes in Southwater

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

Planning policy requires that housing development addresses real, locally identified need — not simply that it contributes to a district-wide total. The relevant question is not whether Horsham District as a whole requires additional housing; it is whether there is credible evidence that Southwater specifically needs 1,000 more homes, in addition to the 1,150 already committed at Broadacres and the Horsham Golf Club site.

There is no such evidence. Much of the housing pressure in this part of West Sussex originates from factors outside Southwater: the expansion of Gatwick Airport's workforce, Crawley reaching its physical limits, and housing shortages in coastal towns to the south. These are pressures generated elsewhere and should be addressed closer to where they arise — not displaced into a village with limited employment opportunities of its own.

Horsham District Council's own economic strategy identifies North Horsham and the Gatwick Diamond as the district's primary employment and growth corridors. Southwater is not identified as a strategic growth location. Building 1,000 homes here does not place people near jobs; it creates a commuter settlement dependent on a congested A-road for access to employment, education and services.

The primary reason this site is being promoted is that Berkeley Homes owns the land. Land ownership is not a planning justification. The existence of a willing landowner does not equate to evidence of local housing need.

In the absence of transparent, independently reviewed evidence demonstrating that Southwater itself — not Horsham District generally — requires 1,000 additional homes, the proposal fails to meet national and local planning requirements relating to justified site selection, sustainable development, and the alignment of housing growth with local need.

I therefore request that the Berkeley Homes proposal be refused until Horsham District Council and Berkeley Homes have published clear, independently reviewed evidence demonstrating genuine local housing need for 1,000 homes in Southwater.

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

8A: The 2025 drought proves the water supply cannot support 1,000 more homes

2025 drought: Declared the hottest summer since records began in 1884; the preceding spring was the driest in 132 years

Environment Agency: Confirmed in October 2025 that England required at least 100% of average winter rainfall to recover — which did not materialise.

Hosepipe bans: Temporary Use Bans imposed across the region including by Southern Water in 2025

National shortfall: England faces a projected deficit of nearly 5 billion litres of water per day by 2050 — Sussex is among the worst-affected areas

Economic cost: Water scarcity estimated to cost the UK £25 billion over the next five years due to stalled housing and business development

Objection: Unreliable Water Supply Infrastructure and Failure to Demonstrate That 1,000 Additional Homes Can Be Safely Served

I am objecting to the Berkeley Homes proposal to construct 1,000 dwellings northwest of Southwater on the grounds that the water-supply infrastructure serving this area cannot reliably support the level of additional demand the development would generate.

The summer of 2025 was the hottest since records began in 1884. The preceding spring was the driest in 132 years. Hosepipe bans were imposed across the region. In October 2025, the Environment Agency confirmed that England required at least 100% of average winter rainfall simply to recover from drought — rainfall that did not materialise. Sussex is among the regions 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 distant forecast; it is a present and worsening reality that must inform planning decisions.

The basis on which Horsham District Council is monitoring water-demand capacity is fundamentally flawed. 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. However, 110 lpppd is not a measure of current consumption. 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
- 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 — an underestimate of around 60 litres per household per day, or approximately 21%. A sample survey of actual consumption at the nearby Broadacres new-build

development — homes fitted with water-efficient fixtures — recorded average consumption of approximately 200 lpppd, nearly double the Council's monitoring assumption.

This discrepancy was explicitly raised with HDC, supported by Southern Water's own data. Despite being informed that its methodology is in error by approximately 21%, the Council has confirmed that it intends to continue using this figure. Save Rural Southwater has submitted a formal maladministration complaint. The Council is therefore on notice that its monitoring methodology is technically incorrect and subject to an active complaint — yet it continues to use that methodology as the basis for approving major development. The practical consequence is that HDC risks approving a volume of development that exceeds Southern Water's actual supply capacity, resulting in water shortages for existing and future residents.

Berkeley Homes' 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 the Environment Agency has identified as a structural trend. The application simply assumes that water will be available. 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 — without a confirmed, independently verified supply strategy is not acceptable. The removal of the 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.

In the absence of a formal, independently verified confirmation from Southern Water that water supply can reliably serve 1,000 additional homes in Southwater — including during drought years — the application fails to meet national and local planning requirements relating to infrastructure capacity, environmental resilience, and sustainable development.

I therefore request that the Berkeley Homes proposal be refused until Southern Water has provided such confirmation.

8B: Southern Water's own track record means its assurances cannot be relied upon

Criminal conviction: Southern Water pleaded guilty in 2020 to 51 offences of deliberately discharging untreated sewage — the worst case in Environment Agency history

Fine: Fined £90 million — but has continued to discharge sewage unlawfully since

Investment dispute: Ofwat ordered Southern Water to raise bills by up to 44% by 2030 to fund infrastructure — Southern Water is appealing this in February 2025

Leakage: Nearly 19% of all water supplied in England is lost to leakage before reaching customers — most companies, including those in Sussex, are missing their targets

Water usage gap: HDC's water demand forecasting is misaligned with Southern Water's own published consumption figures by 21%

Objection: Southern Water's Track Record and the Absence of Independent Verification of Water and Wastewater Capacity

I am objecting to the Berkeley Homes proposal to construct 1,000 dwellings northwest of Southwater on the grounds that Southern Water — the statutory undertaker responsible for supplying potable water and treating wastewater for this development — cannot be relied upon to deliver the infrastructure required. Independent verification of capacity and reliability is essential, and none has been provided.

In 2020, Southern Water pleaded guilty to 51 separate criminal offences involving the deliberate discharge of untreated sewage into coastal and inland waters. The Environment Agency described this as the worst case in its history. The company was fined £90 million. Since then, unlawful sewage discharges have continued.

Ofwat has ordered Southern Water to raise customer bills by up to 44% by 2030 to fund the infrastructure improvements required to bring its network to an acceptable standard. Southern Water is currently appealing this decision, creating serious uncertainty about whether the necessary investment will be delivered. A company actively challenging the investment its regulator considers essential cannot be assumed to have the financial capacity or willingness to support major new development.

Nearly 19% of all water supplied in England is lost to leakage before it reaches customers' taps. Building 1,000 additional homes into a network where almost a fifth of supply is already being wasted is not a sustainable or responsible approach to water-resource planning. Compounding this, Horsham District Council's own water-demand forecasting has been shown to be approximately 21% out of alignment with Southern Water's published consumption figures. This means that even the official planning assumptions used to justify water-supply adequacy are unreliable. Approving major development on the basis of flawed consumption data risks placing both existing and future residents in a position of water insecurity.

Berkeley Homes' application contains no independently verified assessment of whether Southern Water's network — already under strain in dry years — has the headroom to serve an additional 1,000 homes. There is no cumulative assessment alongside the 1,150 homes already committed in Southwater. There is no analysis of drought resilience. The application simply assumes that Southern Water will provide the necessary capacity. Given the company's regulatory history, financial uncertainty, and operational performance, such an assumption is not credible.

In the absence of an independent assessment — undertaken by a body other than Southern Water — confirming that both water supply and sewage-treatment capacity can reliably support this development, including during drought years, the application fails to meet national and local planning requirements relating to infrastructure capacity, environmental protection, and sustainable development.

I therefore request that the Berkeley Homes proposal be refused until an independent body has assessed and confirmed the reliability of water-supply and wastewater-treatment capacity for this development.

8C: Water usage forecasts used to justify this development assume levels of conservation that are unrealistic and unproven

Demand-side assumption: Developers' water demand calculations assume significant future reductions in per-household water use

Real-world evidence: Residents on the recently built Berkeley Homes Broadacres estate have removed water-saving devices from their homes because they were not getting enough water with them installed

Part G changes: Proposed new building regulations (Part G) would save only about 20 litres per person per day — far too small to close the supply gap from 1,000 new homes

Aquifer risk: Groundwater abstraction at Hardham is already under pressure — continued over-abstraction risks long-term damage to a designated SSSI (Site of Special Scientific Interest)

Objection: Water-Demand Calculations Are Based on Unrealistic and Methodologically Flawed Assumptions

I am objecting to the Berkeley Homes proposal to construct 1,000 dwellings northwest of Southwater on the grounds that the water-demand calculations used to justify the development are based on unrealistic assumptions that do not reflect actual household consumption. As a result, the application significantly underestimates the pressure the development would place on an already stressed water-supply network.

The water-usage forecasts underpinning this proposal assume substantial future reductions in per-household consumption — reductions that have not been achieved in practice and are unlikely to be achieved through current measures. Horsham District Council's own monitoring methodology compounds this problem. The Council's Planning Policy Team Leader has confirmed that HDC uses an assumed consumption figure of 110 litres per person per day (lpppd) as its baseline, described as being in line with Building Regulations for a water-stressed area.

However, 110 lpppd is not a measure of current consumption. It is an aspirational target set by the Environment Agency for achievement by 2050. Using it as though it reflects present-day reality is a fundamental methodological error.

Southern Water's published data for April 2025 to March 2026 records actual average consumption as:

- 232 litres/day for single-occupancy households
- 301 litres/day for dual-occupancy households
- approximately 335 litres/day for an average 2.5-person household

HDC's assumption of 110 lpppd equates to approximately 275 litres/day for a 2.5-person household — compared with Southern Water's actual figure of approximately 335 litres/day. This is a discrepancy of around 60 litres per household per day, representing an underestimate of approximately 21%. HDC is therefore systematically underestimating actual demand on Southern Water's network when assessing whether new development can be supported.

We also have direct local evidence confirming this gap between assumption and reality. Residents on the recently built Berkeley Homes Broadacres estate have already removed water-saving restrictors from taps and showers because water pressure and volume were inadequate for normal household use. Save Rural Southwater conducted a sample survey of actual consumption at Broadacres — homes fitted with water-efficient fixtures — which recorded average daily consumption of approximately 200 lpppd, nearly double the Council's monitoring assumption. Both HDC and Southern Water declined invitations to conduct a similar exercise themselves.

This methodological error was explicitly raised with HDC, supported by Southern Water's own data. Despite being informed that its monitoring approach is inaccurate by approximately 21%, the Council has confirmed that it intends to continue using this figure. Save Rural Southwater has submitted a formal maladministration complaint. The Council is therefore on notice that its methodology is technically incorrect and subject to an active complaint — yet it continues to rely on it as the basis for approving major development.

Proposed changes to Building Regulations (Part G) would, if implemented, save approximately 20 litres per person per day. For a development of 1,000 homes with approximately 2,500 residents, that equates to around 50,000 litres per day — a meaningful saving, but nowhere near sufficient to close the supply gap created by the development, particularly given that actual consumption at comparable new-build properties is running at nearly double the Council's assumed baseline.

Groundwater abstraction at Hardham — a key source for this area — is already at levels that risk long-term ecological damage to a designated SSSI. Increasing demand from 1,000 new homes will only intensify this pressure. The combined picture — a flawed monitoring methodology, actual consumption far above assumed figures, a regulator declining to verify its own data, and a key abstraction source already under ecological stress — makes it

impossible to conclude that water-supply infrastructure can reliably support this development.

In the absence of independently verified water-demand calculations based on actual usage data from comparable recent developments, including Broadacres, the application fails to meet national and local planning requirements relating to infrastructure capacity, environmental resilience, and sustainable development.

I therefore request that the Berkeley Homes proposal be refused until the water-demand calculations have been independently verified against real-world consumption data rather than theoretical modelling.

9. Southwater Has Had Its Fair Share — This Development Cannot Be Justified

9A: Southwater is already absorbing four times its Neighbourhood Plan housing allocation

Neighbourhood Plan allocation: 420–460 homes — approved by referendum 2021

Broadacres: ~350 homes under construction

Horsham Golf Club site: ~800 homes with planning permission

Current committed total: ~1,150 homes — already 2.6 times the Neighbourhood Plan figure

If Berkeley Homes approved: ~2,150 homes total — 4.7 times the Neighbourhood Plan allocation

— a 62.9% increase on what is already committed

Objection: Southwater Has Already Exceeded Its Proportionate and Democratically Agreed Housing Contribution

I am objecting to the Berkeley Homes proposal to construct 1,000 dwellings northwest of Southwater on the grounds that the village has already been subjected to far more housing growth than its own democratically approved community plan identifies as appropriate.

In 2021, Southwater residents voted through a Neighbourhood Plan that set the village's housing contribution to Horsham District at approximately 420–460 homes. This figure was carefully determined based on what the village's infrastructure, landscape, and services could sustainably support.

Since that vote, two major developments have already been approved that far exceed this figure.

- Broadacres (around 350 homes) is under construction.
- The Horsham Golf Club site (around 800 homes) has planning permission.

Together, these amount to 1,150 homes — more than two and a half times the number residents agreed was appropriate.

Berkeley Homes now proposes to add a further 1,000 homes, bringing the total to over 2,150 new dwellings. That is nearly five times the Neighbourhood Plan figure and represents a 62.9% increase on top of what is already in the pipeline.

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 multiple locations in a fair and sustainable manner — not concentrated overwhelmingly on a single settlement that has already delivered far more than its proportionate share.

Southwater's Neighbourhood Plan was produced through extensive consultation and endorsed by residents via referendum. It represents the community's democratically expressed view of what level of growth is appropriate and sustainable. To impose more than five times that level of development would undermine the purpose of neighbourhood planning and disregard the community's clearly stated position.

In the absence of any justification for why Southwater should absorb such a disproportionate share of district-wide housing growth — and given that the village has already exceeded its democratically agreed contribution — the proposal fails to meet national and local planning requirements relating to sustainable development, community engagement, and the proper role of Neighbourhood Plans.

I therefore request that the Berkeley Homes proposal be refused on the grounds that Southwater has already substantially exceeded its proportionate and democratically agreed housing contribution.

9B: This is a developer-driven proposal — not a community-identified need

Planning history: Berkeley Homes applied for 1,500 homes here in 2022 (DC/22/1916) — application withdrawn Feb 2023 after officer opposition

Timeline: Berkeley Homes withdrew in Feb 2023. Horsham District Council published a Draft Local

Plan in Dec 2023 allocating the same land for 1,000 homes

Connection: Berkeley Homes' own promotional materials confirm the land was 'identified in the draft

Local Plan as suitable' — the plan was written around the developer's site

Proper test: A local plan allocation must be justified by independent evidence — not adopted from a developer's withdrawn application

Objection: Developer-Led Proposal With No Independent Planning Justification

I am objecting to the Berkeley Homes proposal to construct 1,000 dwellings northwest of Southwater on the grounds that it is a developer-led scheme with no credible independent planning justification.

In 2022, Berkeley Homes submitted an application for 1,500 homes on this same site (Horsham reference DC/22/1916). Horsham District Council's own planning officers concluded that the proposal was unacceptable on multiple grounds, including infrastructure capacity, ecology, and highways. The application was withdrawn in February 2023.

Remarkably, within ten months of that withdrawal, Horsham District Council published a new Draft Local Plan allocating the same land — now for 1,000 homes, under the same developer's stewardship. Berkeley Homes' own promotional materials stated that the land had been “identified in the draft Local Plan as suitable for development.”

This sequence of events is deeply disturbing. A Local Plan is intended to be a community-led document, based on independently assessed evidence of need and a transparent evaluation of the most suitable locations for development. It is not intended to adopt a developer's withdrawn planning application as strategic housing policy.

The figure of 1,000 homes in the Draft Local Plan matches Berkeley Homes' commercial proposition precisely. No independent evidence base has been published explaining why 1,000 homes — rather than the 420–460 homes identified in the Southwater Neighbourhood Plan, or any other figure — is the appropriate level of growth for this village. There is no transparent assessment of alternatives, no settlement-hierarchy justification, and no explanation of how this number aligns with infrastructure capacity, landscape constraints, or sustainable-development principles.

The appearance is that the allocation reflects developer lobbying rather than genuine community need or independent planning analysis. This undermines public confidence in the integrity of the plan-making process and contradicts the purpose of neighbourhood planning, which is to give communities a meaningful voice in shaping local growth.

In the absence of independently verified evidence demonstrating that 1,000 homes is the appropriate and sustainable level of development for Southwater — and given the clear alignment between the Draft Local Plan allocation and Berkeley Homes' commercial interests — the proposal fails to meet national and local planning requirements relating to justified site selection, transparency, and sound plan-making.

I therefore request that the Berkeley Homes proposal be refused on the grounds that it is a developer-led scheme with no credible independent planning justification, and that its inclusion in the Local Plan appears to reflect developer influence rather than genuine community need.

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

Novartis brownfield site: Former pharmaceutical factory, North Horsham — 244 affordable homes already approved (planning consent granted October 2025)

December 2024 Brownfield Register: HDC has a published register of brownfield land available for development across the district

Active travel investment: West Sussex County Council is investing in bus and cycling improvements on the A264, A281, and Horsham–Crawley–Gatwick corridor — none of which reaches Southwater

Principle: Building on brownfield land first, before greenfield farmland, is a core planning principle — and is better for the environment

Objection: Brownfield Land Should Be Prioritised Before Further Greenfield Release at Southwater

I am objecting to the Berkeley Homes proposal to construct 1,000 dwellings northwest of Southwater on the grounds that brownfield land elsewhere in Horsham District should be developed before more farmland in Southwater is released for housing.

The principle that previously developed (brownfield) land should be used before greenfield farmland is a core element of national planning policy. It protects the countryside, reduces the infrastructure burden of new development, and places homes closer to existing services, employment and sustainable transport.

A clear example is the former Novartis pharmaceutical site in North Horsham. It already has planning permission for 244 affordable homes, granted in October 2025. It is significantly closer to Horsham town centre, rail services, and the district's main employment areas. It requires no major new road infrastructure to be genuinely sustainable.

West Sussex County Council is currently investing in bus and cycling improvements along the A264, A281 and the Horsham–Crawley–Gatwick corridor. These investments make development along those corridors more sustainable. None of this investment reaches Southwater.

Horsham District Council's December 2024 Brownfield Register makes the position clear. Across the entire district, HDC has identified just 18 brownfield sites with a combined capacity of approximately 827 dwellings, covering around 20.98 hectares. This total includes sites already under construction, sites with lapsed permissions, and sites that have remained unimplemented for many years. The largest single site — the former Novartis site, with permission for 300 dwellings — remains unbuilt. Several other sites with permissions dating back as far as 2014 have still not progressed.

Berkeley Homes is now seeking permission for 1,000 homes on a single greenfield site. That is more housing than the entire brownfield land supply HDC has identified 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 remain unbuilt and unprogressed is not consistent with the brownfield-first principle at the heart of national planning policy. It also undermines public confidence in the plan-making process and risks locking the district into unsustainable development patterns.

In the absence of clear evidence that all identified brownfield land has been fully considered and prioritised, the proposal fails to meet national and local planning requirements relating to sustainable development, land-use efficiency, and countryside protection.

I therefore request that the Berkeley Homes 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.