

From: Planning@horsham.gov.uk <Planning@horsham.gov.uk>
Sent: 10 September 2026 12:49:39 UTC+01:00
To: "Planning" <planning@horsham.gov.uk>
Subject: Comments for Planning Application DC/26/0933
Categories: Comments Received

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 10/09/2026 12:49 PM.

Application Summary

Address:	Land Between Muntham Drive and Smugglers' Lane Chapel Road Barns Green West Sussex
Proposal:	Erection of 31 dwellings with access from Chapel Road including roads, parking and open space.
Case Officer:	Alice Johnson

[Click for further information](#)

Customer Details

Address: CAMOMILE BARN EMMS LANE BROOKS GREEN

Comments Details

Commenter Type:	Member of the Public
Stance:	Customer objects to the Planning Application
Reasons for comment:	- Design - Highway Access and Parking - Loss of General Amenity - Other - Overdevelopment - Trees and Landscaping
Comments:	(1) Sewage Discharged into Watercourses and Sewage Works Capacity

The ability of the Barns Green Treatment Works is of serious concern with extensive evidence that the plant and equipment in the works cannot cope with flows already entering the works.

Southern Water have repeatedly provided mis-leading and incorrect information regarding the Sewage Treatment Works and are unable to confirm that adequate capacity is available.

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

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

This is creating a major environmental disaster polluting the local Parsons Brook and the wider Adur river system.

(2) Inappropriate Housing Design

HDC's Planning Framework Policy 34 states that development should reinforce the special character of the historic environment through appropriate siting, scale, form and design; and should make a positive contribution to the character and distinctiveness of the area.

The standardised suburban design and appearance, fail to positively respond to the character and appearance of the locality within the historic core of the village.

(3) Inadequate Infrastructure including Electricity Supply

Local electrical supply infrastructure is proven to be inadequate. The recent Sumners Fields development with only 32 houses having had to run on temporary generators for months because the local network cannot reliably supply those homes. If this is the case how will an additional 31 houses with electric heating be supplied with electricity ?

I can find no applicant's Energy Statement but assume that all 31 homes will use air source heat pumps for heating which is a significant electrical load. Yet their application documents contain no consultation with UK Power Networks and no assessment of grid capacity.

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

(4) Flooding - Roadway Surface Water and Other Runoff

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

Serious flooding has occurred recently and regularly in this area with water flowing down the hill entering buildings including the village shop which is opposite the site and already prone to flooding.

This flooding risk will be exacerbated by both the increased runoff and the speed of runoff from the proposed housing development with all its paved areas and roadways.

There is photographic evidence of water flooding out of the site where the road access is proposed and overflowing the roadway drains opposite.

Drainage measures proposed by the developers will not guarantee the resolution of this risk of flooding which will increase due to the proposed housing.

(5) Conflict with the Neighbourhood Plan

The Itchingfield Neighbourhood Plan (2025) which is a made plan endorsed by HDC, who stated that it 'carries full weight as part of the development plan for this part of the district', categorised this site as 'undevelopable'.

Additionally both the current (made) Horsham District Planning Framework and SHELAA concluded the site was 'undevelopable'.

A number of policy elements in these respective documents are relevant to this application and support refusal.

Furthermore, public response to the site when it was proposed in the Call for Sites for the Neighbourhood Plan was overwhelmingly negative.

(6) Over Development

Even the draft HDC Local Plan only allocated this site for 25 homes. The applicant is proposing 31 which is a 24% increase with no justification.

Consequently 31 homes would represent clear overdevelopment.

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

(7) Conflicts with the Countryside Policy (BUAB)

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

location.

The proposed development site is a speculative housing scheme which lies in countryside outside the Built-up Area Boundary, and is not essential.

(8) Traffic Generation, Parking Impact and Traffic Conflicts

The proposed site and its proposed access are positioned near the Queens Head pub and the village shop, and more concerning adjacent to a new proposed access for a further housing estate. This location is already a known bottleneck for traffic and the new access will cause congestion and increase the risk of accidents.

This development will generate over 90 vehicle movements per day and will create dangerous 'blind-spots' cause serious traffic conflicts.

If the adjacent housing estate development is approved in the future this will create a disastrous traffic situation.

Parking serving the village shop which will be severely impacted by the proposed development.

The generation of the additional traffic movements will overload the roads in the area which are only country lanes.

NPPF paragraph 116 requires assessment of 'residual cumulative impacts' on the road network, and these cumulative traffic impacts must be assessed and critically considered including the 32 new homes at Sumners Fields which will generate over 90 vehicle movements per day.

(9) Housing Mix and Deliverability Concerns

- Wrong Housing Mix

The proposed affordable housing is heavily weighted towards 1 and 2-bedroom units at 72% of the provision. Yet the Housing Register shows that 61% of demand is for 3-4 bedroom family homes - households who are waiting three times longer than those needing smaller accommodation.

- Deliverability Concerns

In addition there is no agreed provider to finance and manage the homes.

This is very relevant because local precedent where developers have been unable to deliver on commitments of affordable housing made at the application stage, due to withdrawal from intended agreements.

It means the prospect of fulfilment of affordable housing commitment in this Application need to seriously questioned.

(10) No Proven Housing Need

On the site at Sumner's Fields which is in close proximity to this proposed development, house construction has been stopped by the developer at 20, although the site is approved for 32. And only 9 of the homes have been sold which clearly indicates there is no justified need for these houses.

The 'need' determined by the Standard Method is creating wasteful, destructive, pointless and unwanted development in rural communities.

(11) Public Transport Limitations and Issues

There are already inadequate bus services for the village residents which means that the only realistic choice for the majority of people leaving and returning home daily is by car. The increase in cars will adversely impact road safety and contribute to the burden on Highway maintenance, traffic volumes, and emissions.

With only two buses on a Wednesday and no evening services at all, this is not a location where sustainable transport is a credible alternative to the car as evidenced by the bus timetable below.

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

(12) Damage to Listed Buildings

The Grade II listed building (Bennetts) which is close to the boundary of the proposed development has no foundations and is at serious structural damage risk both during construction and as a result of this development.

Of particular concern is the mention of piling activity, which will propagate vibrations through the ground with the potential to damage or destabilise the footings of Bennetts.

(13) Harm to Ancient Woodland and Other Habitat Loss

The boundary of the site adjoins Ancient Semi Natural Woodland recorded on the Ancient Woodland Inventory as reference ANCWOO122269. This is an irreplaceable habitat protected under

NPPF paragraph 186(c), which states:

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

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

The applicant proposes an inadequate buffer zone, the minimum recommended in the Standing Advice. However, the Standing Advice explicitly states:

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

A larger buffer is warranted in this case because:

- Significant recreational pressure. 31 homes will generate approximately 70+ residents, plus visitors and pets, creating substantial pressure on the woodland edge
- The site is on Weald Clay with documented drainage issues; changes to surface water management could affect the woodland's hydrology.

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

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

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

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

Standing Advice: Indirect Effect How This Development Causes It
Increasing disturbance to wildlife from additional people and traffic
31 homes = 70+ residents + over 90 vehicle movements daily
Increasing damaging activities like domestic pets' Cats predating wildlife; dogs disturbing ground-nesting birds and dormice
Increasing light and air pollution Street lighting, car emissions, changed drainage patterns

NPPF paragraph 186(c) protects ancient woodland from

deterioration, not just direct loss. The cumulative indirect effects from 31 homes will cause deterioration of this irreplaceable habitat over time.

(14) The Removal of Important Hedges

The development is reliant on removal of the hedgerow which runs along the edge of the site area at the proposed access onto Chapel Road. Without the removal of this hedge it will not be possible provide safe traffic movement in and out of the proposed development.

This will destroy the flora and fauna and the established natural but diminishing habitat which is so important to wildlife.

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

The hedge also contributes to the overall rural character of the village.

(15) Village Character, Listed Buildings and Heritage Impact

The Neighbourhood Plan's Landscape Character Assessment describes the fields north and west of the village as 'important small pastoral fields' that provide important green gaps that contribute to a settlement with rural character and provides a transition to the wider countryside.'

Which is precisely what this field does. It is the green buffer between the village centre and open countryside. Building here would:

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

(16) Loss of Rural Amenity

As stated above the Neighbourhood Plan's Landscape Character Assessment describes the fields north and west of the village as 'important small pastoral fields'.

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

(17) Protected Species will be Affected

Dormice are present in hedgerows connecting to the woodland. A Dormouse Survey Report (2025) confirms the presence of hazel dormice, a European Protected Species.

In addition the HDC Ecology Officer has concerns regarding the presence of Bats, which are another European Protected Species, and has requested that a survey be undertaken.

Furthermore there are believed to be rare insects including ants on the site, their presence should be thoroughly investigated, and due regard given to the general biodiversity duty to care for nature.

Destroying any wildlife habitat is a serious concern and the continuing loss of hedgerows, woodland and open grass areas is causing significant damage to our important ecology.

Kind regards

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**Horsham
District
Council**

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