

Attn: Case Officer Mr M. Porter

Horsham District Council

planning@horsham.gov.uk

31 March 2026

Dear Mr Porter

CPRE Sussex representation OBJECTING to

DC/26/0366

Land North West of Southwater

Outline planning application, with all matters reserved (except for primary access to the highway) for a phased development comprising: the demolition of existing buildings and the construction of residential dwellings (including affordable housing) (Use Classes C2 and C3); a mixed-use neighbourhood centre (Use Classes E and F); education facilities (Use Class F1(a)); business and employment floorspace (Use Classes B2, B8 and E(g)); redevelopment of existing agricultural buildings including construction of a building for community use (Use Classes E and F2); improvements to public rights of way; sports pitches; gypsy and traveller pitches/plots; public open space; landscaping, and associated infrastructure.

Our concerns and reasons for objecting to this application are explained below.

1. Clarification needed: How many dwellings?

1.1 The above summary description of the proposed scheme as submitted by the applicant omits the intended number of residential dwellings that the applicant wishes to build on the Site.

1.1 The applicant's Planning Statement, at paragraph 1.13, advises that the proposed development would deliver "approximately 1,000 new homes".

1.2 However, the applicant's Environmental Statement Volume II Appendix 8.7 Bat Survey Report Rev A (February 2026) states that "Development for the main site include an outline planning application for a residential-led development to include demolition of existing buildings and provision of up to 1,500 homes" (paragraph 1.3.1).

2. Instead of being bundled together with the ‘Main Site’ in a single outline application, the ‘North Site’ at Christ’s Hospital should be the subject of a separate site-specific application.

2.1 DC/03/0366 combines the following sites/land parcels in a single application:

DAS land parcel A: the ‘Main Site’ of 115.36ha of countryside, predominantly farmland, adjoining the western edge of Southwater’s built area.

DAS land parcel B: the ‘North Site, of 1.35ha, located 800m to the north-west of the main site. This land parcel comprises a field adjacent to Christ’s Hospital railway station’s carpark and the Christ’s Hospital settlement’s northwest edge (Planning Statement, and Design and Access Statement: Introduction (DAS)).

2.2 Instead of being bundled together with the Main Site in a single outline application, the ‘North Site’ at Christ’s Hospital should be the subject of a separate site-specific application.

3. Contrary to the DAS, the Applicant’s Bat Survey Report states that land parcel A/ the Main Site has an area of approximately 128ha, not 115.36ha (Environmental Statement Volume II Appendix 8.7 Bat Survey Report Rev. A, paragraph 1.1.1).

Clarification needed: how many hectares?

4. The applicant’s Design and Access Statement (DAS) site plan shows two additional separate land parcels, designated C, of 14.08ha and D, of 1.97ha, for unspecified ‘off-site’ measures. These land parcels comprise fields located close to the main site’s southern boundary.

4.1 The ‘off-site measures’ should be explained and impacts assessed.

5. Southwater is already having to accommodate and assimilate large developments, including unplanned-for-development imposed on the community by developers, which has yet to be built out.

5.1 HDC’s Regulation 19 Horsham District Local Plan (HD)LP acknowledges that Southwater has ‘accommodated large developments in recent years’ and that ‘care needs to be taken to ensure communities can absorb changes that have taken place to allow stable, cohesive communities’ (Chapter 10: Housing, page 127, 5th bullet).

5.2 The cumulative impact that the applicant’s imposition of 550 residential units, in addition to the 450 allocated in Southwater’s Neighbourhood Plan, would have on the stability and cohesion of the community should be significant planning concerns.

Whether the allocation of the Site to the HDLP was justified, effective, consistent with national policy and positively prepared was neither

considered nor determined at and by the abruptly terminated Examination in Public (EiP) December 2024.

6. The application is speculative.

6.1 The proposed development site was allocated within the Regulation 19 Horsham District Local Plan 2023 – 2040 (HDLP) under Policy HA3 Land North West of Southwater.

6.2 The Examination in Public (EiP) of the Plan, which commenced on 10 Dec 24, was suspended by the examining Inspector after only three days (10th, 11th and 12th Dec 24) and was subsequently rejected by him.

6.3 Consequently, whether the allocation of the Site to the HDLP was justified, effective, consistent with national policy and positively prepared was neither considered nor determined at and by the abruptly terminated EiP.

6.4 The EiP of the HDLP is to resume this year in April. Site allocations are to be examined in September. The submission of DC/26/0366 in advance of the examination of the local plan is therefore speculative.

Whether the proposed scheme would deliver housing that is truly affordable is not assured.

7. When supposedly ‘affordable’ rentals “can cost up to 80% of private rents, the reality is that they aren’t that affordable at all” Shelter: The problem we are facing’

https://england.shelter.org.uk/support_us/campaigns/social_housing/what_is_social_housing

7.1 The applicant’s Planning Statement advises that the proposed development would deliver “Approximately 1,000 new homes, of which up to 350 will be affordable homes” (paragraph 1.13 first bullet point):

“In accordance with both adopted and emerging policy, 35% of the proposed C3 dwellings (equivalent to approximately 350 homes) will be affordable homes” (paragraph 8.4) comprising:

“a tenure mix of 70% affordable / social rent, and 30% shared ownership, will be delivered subject to any future Local Plan evidence base review and / or the latest evidence of need and market demand” (paragraph 9.6).

7.2 Total ‘affordable/social rent’ homes: 70% of 350 homes = 245.

8. Since ‘affordable’ and ‘social’ housing are often used interchangeably, clarification of the applicant’s intent is needed.

8.1 Will the 245 ‘affordable/social rent homes’ be ‘Social Rent’ housing, as defined in the NPPF (December 2024) Glossary:

a) Social Rent: meets all of the following conditions: (a) the rent is set in accordance with the Government’s rent policy for Social Rent; (b) the landlord is a registered provider; and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision?

Or will the 245 include ‘other affordable housing for rent’, defined in the NPPF?:

b) Other affordable housing for rent: meets all of the following conditions: (a) the rent is set in accordance with the Government’s rent policy for affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent)?

Clarification is essential.

9. Shelter advise in their ‘The problem we're facing’:

https://england.shelter.org.uk/support_us/campaigns/social_housing/what_is_social_housing

“Social rent homes are the only genuinely affordable type of home because their rents are set by a formula tied to local incomes. On average, the weekly rent for a genuine social home is around £89 compared to £196 for private renters – around half the cost.

We see too little investment in social rent homes because funding and policy have been directed at less affordable tenures. Only 11,400 social rent homes were delivered last year, and 23,000 were lost due to sales, demolitions and the conversion of long-term empty homes.

The term social housing has been legally broadened to include homes many people cannot afford, such as affordable rent and even low-cost ownership products. Although ‘affordable’ and ‘social’ housing are often used interchangeably, Shelter’s fight for social housing is a fight for social rent homes.

The Government’s Affordable Homes programme provides grant funding to support the development of both affordable and social homes. This programme includes social rent, affordable rent, and affordable homeownership”.

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The Government’s Affordable Homes programme provides grant funding to support the development of both affordable and social homes. This programme includes social rent, affordable rent, and affordable homeownership.

“There are at least 2,254 Section 106 Affordable Homes across 84 Local Authorities that are either under construction or due to commence construction within the next 12 months that are not currently under contract with a Registered Provider”.

9.1 Accordingly, whether a Registered Provider can be “engaged to deliver and manage the affordable homes (social rent or other affordable housing for rent) proposed by the applicant is not assured.

10. Since it is the applicant’s intention that affordable housing for the scheme is to be secured by a Section 106 Agreement (Planning Statement paragraph 8.5), the actual number of affordable homes delivered will be dependent on financial viability.

10.1 Accordingly, the 35% affordable housing offered by the applicant is likely to be reduced at the Reserved Matters’ stage on grounds of financial viability, which seems likely given the enormous scale of the proposed scheme and resultant costs that will undoubtedly be incurred in the development of the site.

Whether the applicant’s proposed shared ownership homes would be truly affordable is not assured.

11. 105 (30%) of the 350 ‘affordable homes’ will be shared ownership homes. Whether ‘shared ownership’ homes are truly ‘affordable’ is in doubt, for the reasons explained below.

11.1 Findings of The Shared Ownership House of Commons Levelling Up, Housing and Communities Committee’s Fifth Report of Sessions 2023-24 (26 March 2024) included:

“Shared ownership schemes are drastically failing to deliver an affordable route to homeownership for too many people and subject buyers to rising rents, uncapped

service charges, complex leases and a disproportionate exposure to repair and maintenance costs”.

“The main issue faced by most shared owners is uncapped service charges levied by the provider or landlord. These increasing costs inhibit the ability of shared owners to increase their share (“staircase”) over time and achieve their ambition of 100% homeownership. This is exacerbated by the fact that shared owners are unfairly liable for 100% of the repairs and maintenance costs of their property despite owning only a proportion of it. Many of the repairs and maintenance services shared owners then receive are not done in good time and are often of poor quality”.

“There is a significant and concerning data gap when it comes to shared ownership which hinders this assessment and which must be addressed”.

11.2 The report called for the Government to take urgent and significant action to reform how shared ownership schemes currently operate so they can deliver an affordable route to homeownership.

11.3 The findings of this report are reinforced by the subsequent National Audit Office (NAO) Investigation into shared ownership report (published 23 March 2026).

11.3.1 Sir Geoffrey Clifton-Brown, the chairman of the public accounts committee, which worked closely with the NAO, said shared ownership was wholly unsatisfactory for those who relied on the scheme to get a foot on the property ladder.

12. Whether the applicant’s proposed shared ownership homes would be truly affordable is therefore not assured.

The presence of Barbastelle foraging at notable activity levels (including exceptional levels at one location), a probable Bechstein's roost and associated foraging, Brandt's bat with a confirmed roost, four Section 41 species foraging across the site, and an overall assemblage of at least 10 species/species groups is inconsistent with the applicant’s Bat Survey Report’s "low district importance" conclusion.

13. Land North West of Southwater comprises a ‘main site’ of approximately 128 ha, adjoining the western edge of Southwater’s built area, and a ‘smaller area’, a field of approximately 1.35ha, approximately 800m to the north-west of the main site, adjacent the Christ’s Hospital railway station’s carpark and the Christ Hospital settlement’s northwestern edge.

13.1 The main site has trees and redundant buildings suitable for roosts, and an abundance of linear features, including hedgerows and woodland edges providing good connectivity to the wider landscape and links between roosts and foraging features such as woodland, hedgerows, scrub and water bodies.

13.2 The extent of the area subject to bat surveys is shown on the plans provided in the Bat Survey report's Appendix A.

13.3 The Bat Survey report advises that within the main site, bat surveys of areas (totalling 116ha) were undertaken between June 2021 and August 2022 (Environmental Statement Volume II, Appendix 8.7 Bat Survey Report, paragraph 1.3.2)

13.4 The methodology and results of these surveys are presented and interpreted in the report.

13.5 The boundary of the area surveyed is shown on the 'Bat Activity Survey Summary Plan', at the report's Appendix D. Unfortunately, although the boundaries of the survey area marked on the plan, the plan does not show Bat Foraging and Commuting Activity.

14. The 1.35ha field near to Christ's Hospital railway station is bounded on its north side by Sparrow Copse, a designated Ancient Woodland (AW) and Local Wildlife Site (LWS).

14.1 Within the Ancient Woodland and in proximity to the site there is a spring fed ghyll stream which could also attract bats. The presence of this important water body, a tributary of the River Arun, is not mentioned in the applicant's minimalist and inadequate ecological appraisal of the site.

14.2 Although the ecological appraisal acknowledges that 'opportunities' for foraging and commuting bats are 'enhanced by the mature trees, scrub, and woodland edge habitats occurring around the site margins', which 'provide connective habitat with the wider area', no on-site bat activity surveys have been undertaken of the field and its boundaries (Land North West of Southwater Christ's Hospital 2025 Ecological Appraisal).

15. Land North West of Southwater has trees and redundant buildings suitable for bat roosts, and an abundance of linear features, including hedgerows and woodland edges providing good connectivity to the wider landscape, providing links between roosts and foraging features such as woodland, hedgerows, scrub and water bodies.

16. Bats identified at the main site by on-site surveys were as follows

Barbastelle (*Barbastella barbastellus*)

Bechstein's bat (*Myotis bechsteinii*),

Brandt's bat (*Myotis brandtii*),

Brown Long-eared bat (*Plecotus auritis*),

Common Pipistrelle (*Pipistrellus pipistrellus*)

Leisler's bat (*Nyctalus leisleri*),
Nathusius Pipistrelle (*Pipistrellus nathusii*),
Noctule (*Nyctalus noctula*)
Serotine bat (*Eptesicus serotinus*)
Soprano Pipistrelle (*P.pygmaeus*),
Myotis sp.

17. For the reasons explained below CPRE Sussex disputes the applicant's Bat Survey Report's assessment that "the site as a whole" is "of no more than low district importance" for bats (paragraph 5.3.1). The importance of the site for bats is understated.

18. "The presence of Barbastelle foraging at notable activity levels (including exceptional levels at one location), a probable Bechstein's roost and associated foraging, Brandt's bat with a confirmed roost, four Section 41 species foraging across the site, and an overall assemblage of at least 10 species/species groups is inconsistent with a straightforward "low district importance" conclusion". "An exceptionally diverse bat assemblage for any single site in southern England" (Claude AI assessment of the applicant's Bat Survey report).

19. The following is an independent and impartial Claude AI assessment of the applicant's Bat Survey report:

"The report records 10–11 species or species groups foraging on the site. This is an exceptionally diverse bat assemblage for any single site in southern England. Of these, several are of very high conservation significance:

Barbastelle is a UK Biodiversity Action Plan priority species and a Species of Principal Importance under Section 41 of the NERC Act. It is considered rare and highly sensitive to habitat loss. Its presence — even occasional — at a site is generally treated as a significant finding in ecological assessments.

The automated detector at Location H recorded Barbastelle at what the report itself describes as "exceptional activity levels" on one night, with high activity levels on another.

Location C also recorded Barbastelle at a median percentile of 30, which is notably higher than most other species at most locations. Characterising a site with Barbastelle foraging as merely "low district importance" is hard to justify against standard practice guidance.

Bechstein's bat is one of the rarest mammals in Britain and is a European Protected Species of the highest concern. The report records a probable roost in Tree 216 with a call "indicative of Bechstein's bat," and *Myotis* sp. activity (potentially Bechstein's) was recorded at static detector locations G, H, J and M.

The presence of a probable Bechstein's roost on the site, combined with foraging activity, substantially elevates the site's importance beyond "low district."

Brandt's bat is also a Section 41 species and relatively scarce. A confirmed roost was found in building B12.

Nathusius' Pipistrelle achieved the highest median percentile of any species across the whole site (median percentile of 38). This is a notable migratory species, and the report acknowledges this species recorded the highest median percentile for the Southwater site.

The report then states that all species had lower than average activity levels for the region — but this statement appears to be used to minimise the significance of findings rather than assess them in the round.

The flawed "Lower Than Average" Argument

The report repeatedly uses the observation that activity levels were lower than regional averages to support the "low district importance" conclusion. However, this reasoning is flawed in at least two respects.

First, the presence of rare species such as Barbastelle and Bechstein's bat cannot be dismissed simply because their absolute pass counts are low. These species are genuinely scarce across the region, so their presence at any level is significant — low absolute numbers are expected even at important sites.

Second, the automated detector data shows that Location E (woodland belt, north of site) recorded an average of 1,371 bat passes per night, and Location F (hedgerow, west of site) recorded 650 passes per night.

These are not trivial activity levels, and Location E recorded Common Pipistrelle at moderate to high activity for five out of five nights.

The Bat Conservation Trust Good Practice Guidelines (4th edition, 2016, which the report itself cites) do not define importance solely by reference to regional medians.

Species of Principal Importance

The report itself acknowledges at paragraph 5.3.2 that Barbastelle, Soprano Pipistrelle, Noctule and Brown Long-eared bat are all listed as Species of Principal Importance under Section 41 of the NERC Act. It notes this makes their foraging habitat a material consideration.

Yet this acknowledgement sits in some tension with the report's "low district importance" conclusion.

The presence of four Section 41 species foraging regularly across a site, plus two further Section 41 species with confirmed or probable roosts (Bechstein's and Brandt's), is not a basis for a "low" importance rating”.

Structural Concerns About the Assessment

The ‘importance’ classification used in the report ("no more than low district importance") derives from the IEEM Guidelines for Ecological Impact Assessment framework. However, the application of this framework requires transparent reasoning about which factors push importance upward or downward.

The report does not provide transparent reasoning. It lists the species present and the activity levels but then asserts a conclusion without adequately explaining how the presence of nationally rare species, a diverse assemblage of 10+ species, and the confirmed/probable roosts of European Protected Species were weighed.

Summary

A reasonable challenge to the adequacy of the report on this specific point would note that the presence of Barbastelle foraging at notable activity levels (including exceptional levels at one location), a probable Bechstein's roost and associated foraging, Brandt's bat with a confirmed roost, four Section 41 species foraging across the site, and an overall assemblage of at least 10 species/species groups is inconsistent with a straightforward "low district importance" conclusion.

The assessment methodology does not transparently apply the IEEM significance criteria to these findings, and the reliance on below-average regional pass counts to dismiss rare species findings is methodologically questionable.

You would be justified in requesting that the local planning authority seek independent review of the bat survey's significance conclusions before determining the application”.

“Barbastelles are not in favourable conservation status”

20. The ‘Definition of Favourable Conservation Status for Barbastelle bat. Defining Favourable Conservation Status Project (FCSP) report (Matt Zeale and Natural England, March 2024) report advises that “Barbastelle are not in favourable conservation status” and that barbastelle is a:

- Species of Principal Importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006.

- Listed as a Species of Community Interest whose conservation requires the designation of Special Areas of Conservation under the Conservation of Habitats and Species Regulations 2017.
- Listed as a Species of Community Interest in need of strict protection under Annex IV of the Habitats Directive.

21. Barbastelle activity was recorded at Land North West of Southwater’s main site, by means of an automatic detector positioned at seven (of 14) survey locations within the main Site, as follows:

Location	Habitat	Dates in
C	along southern margin of woodland in the north of the site	Jul 2021
D	along a hedgerow in the center of the site	Jul 2021
E	Along a woodland belt in the north of the site	Aug 2021
F	Along a hedgerow in the west of the site	Aug 2021
G	Along woodland belt associated with a stream corridor in the north east of the site	Sep 2021
H	Along the edge of Smith’s Copse in the east of the site	Sep 2021
J	Down’s Link in the south of the site	Oct 2021

Information extracted from Bat Survey Report: Table 8 Summary of bat activity recorded by the automated detector, and Table 3 Details of automated bat detector deployment. The 14 locations at which an automated bat detector was positioned are shown on the Bat Activity Summary Plan at Appendix D.

21.1 In respect of bat activity recorded at location H, the report states “A review of the median percentiles for the Southwater Site indicates that the comparison to other sites in the region, the highest activity levels relative to individual species were for Barbastelle” (Bat Survey Report, Table 8, Page 50).

22. The FCSP report advises that Barbastelle

“hunt predominantly where dense vegetation borders open ground, such as woodland edge, treelines, hedgerows, woodland rides, and above woodland canopy”, making “repeated linear flights back and forth along these edge habitats where moth densities are relatively high”.

“is a light-shy species. Light pollution is expected to pose an increasing threat to barbastelle populations in England over the next 50-100 years by fragmenting habitats and reducing the availability of preferred moth prey in dark habitats”. And that:

“Removal of woodland habitat and field boundary features, such hedgerows and treelines, will have a considerable adverse effect on barbastelle populations in the future”.

Barbastelle is the qualifying species for the Mens Special Area of Conservation (SAC).

23. The Mens is designated an SAC under article 4(4) of the Directive 92/43/EEC on the ‘Conservation of Natural Habitats and of Wild Fauna and Flora. Citation for Special Area of Conservation’, because it hosts Barbastelle, an Annex II listed species, and the Annex I listed habitats: Atlantic acidophilous beech forests with Ilex and sometimes also Taxus in the shrub layer (Quercion robori-petraeae or Ilici-Fagenion). (Beech forests on acid soils).

23.1 Land North West of Southwater is within The Mens SAC’s Wider Conservation Area (Natural England/South Downs National Park: Sussex Bat SAC Planning and Landscape Scale Enhancement Protocol, Map2).

23.2 The Protocol states that

Barbastelle roosting within the SAC “rely on land outside of the site boundaries. Such land which is required to sustain the bats associated with the SAC is referred to as being ‘functionally linked’ to the SAC”.

“Where impacts to such functionally linked land could result insignificant effects to the bat populations associated with the SAC, full consideration needs to be undertaken under the Habitats Regulations (in the same way as habitat in the SAC)”.

“In short, whilst the European protected species legislation protects the bats and their breeding and resting places, it is the effect of the designation of the SAC that protects, through the Habitats Regulations Assessment process, the habitat of the bats outside the SAC”.

24. In respect of Barbastelle, the proposed development site’s habitats should be considered functionally linked to The Mens SAC, and subject therefore to a high level of protection.

25. Harm to habitats functionally linked to the Mens SAC and/or disruption of Barbastelle flight lines would disengage NPPF (December 2024) paragraph 11d).

<https://www.costain.com/insights/2024/upgrade-of-horsham-new-wastewater-treatment-works/>

26. NPPF (December 2024) paragraph 193 stipulates: “When determining planning applications, local planning authorities should apply the following principles:

a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately

mitigated, or, as a last resort, compensated for, then planning permission should be refused;

26.1 The applicant has not located an alternative site for their proposed scheme.

26.2 Given that the applicant's Bat Survey Report has understated the importance of the site for foraging and commuting bats including Barbastelle. Unless proven avoidance-of-harm measures are put in place, including the retention of identified flight lines, including hedgerows and watercourses, significant harm to the species will result, with harming ramifications for the SAC.

27. NPPF (December 2024) paragraph 187 stipulates: "Planning policies and decisions should contribute to and enhance the natural and local environment by:

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs.

27.1 Unfortunately, it seems unlikely that in respect of biodiversity this application, as presented, would establish coherent ecological networks that are more resilient to current and future pressures.

Sewage and other foul water from the proposed scheme should be treated at the Horsham WTW, not the Barns Green WTW

28. Southern Water in their letter to WSP dated 12 July 2022 advises that

"The proposed development would increase flows to the public sewerage system, which may increase the risk of flooding to existing properties and land".

"Additional off-site sewers or improvements to existing sewers will be required to provide sufficient capacity to service the development. Southern Water has a duty to provide Network capacity from the point of practical connection (point of equivalent or larger diameter pipe) funded by the New Infrastructure Charge".

"Southern Water aims to provide this within 24 months following the date that planning has been granted for developments not identified as strategic sites in our current business plan.

Strategic sites are larger developments and will often take longer than 24 months for a full solution to be provided".

"The nearest point where capacity is currently available is at Barns Green WTW which is located approximately 2 km Southwest of the proposed development site". (Flood Risk Assessment and Outline Drainage Strategy: Annex H).

29. Whether the Barns Green WTW has the capacity to treat foul water from the applicant's proposed scheme is questionable (see below). What is indisputable, however, is that Southern Water's letter to WSP is dated 12 July 2022. It therefore predates the commencement of the recently completed major upgrade of the Horsham WTW, which commenced September 2022. The upgrade was undertaken by Costain and MHW Treatment.

30. Costain reported on their website (October 2024) that

"A major upgrade of Southern Water's Horsham New Wastewater Treatment Works (WTW) in West Sussex is being undertaken by CMDP, a joint venture between Costain and MWH Treatment.

The £31 million project, which will improve the site's treatment processes and capacity, commenced in September 2022 and is expected to be finished in Spring 2025. Once complete, it will boost the quality of the final effluent returning to the River Arun, thanks to a range of new hi-tech machinery, control and monitoring systems, as well as the replacement and refurbishment of existing equipment.

The capital scheme at Southern Water's Horsham New WTW will deliver an upgrade to the treatment facilities at the site to cater for the significant growth forecast within the Horsham catchment and surrounding areas over the next ten years, together with an improvement in the Total Phosphate final effluent emission standard, tightening from 1 mg/l to 0.25mg/L".

"These improvements to the site's treatment processes have been designed for a 2035 population equivalent of 93,345, representing a 15% increase since 2020".

30.1 Accordingly, the Horsham WTW has the capacity to treat sewage and other foul water from the proposed scheme.

31. Furthermore "The local Southern Water operated sewage treatment works, Horsham Water Treatment Works, is located 1.2km north west of the proposed development's northern boundary" (Flood Risk Assessment and Outline Drainage Strategy, paragraph 2.5.4).

32. Sewage and other foul water from the proposed scheme should therefore be treated at the Horsham WTW, not the Barns Green WTW.

33. The applicant's Flood Risk Assessment and Outline Drainage Strategy omits to mention that overflows of partially and/or untreated foul water from the Barns Green Wwtw were discharged into the adjacent Parson's Brook 40 times/252 hrs in 2021, 43 times/410.85 hours in 2022, 63 times/569.17 hrs in 2023, and 60 times/502.57 hrs in 2024. <https://theriverstrust.org/sewage-map>

34. Parson's Brook is a tributary of the River Adur, and the Barns Green WTW is located within the Adur West Water Body catchment, which has a 'poor ecological status', apparently due in large part to pollution from sewage discharge.

<https://environment.data.gov.uk/catchment-planning/v/c3-plan/WaterBody/GB107041012290>

35. The Regulation 19 HDLP states "Water quality in the District is/has been deteriorating. The water quality of the River Adur has been recorded as poor in terms of both biological and water quality. New development will need to ensure that increased levels of wastewater are treated to ensure that there is no further deterioration in these levels" (Chapter 6: Conserving and Enhancing the Natural Environment, 5th bullet, page 54).

36. Receiving sewage from the proposed development would add to overflows/discharges of foul water from the Barns Green WTW thereby worsening the existing pollution problem.

37. This would be detrimental to the Adur River Restoration Project - one of only 22 nationwide projects to receive funding (£500,000) from DEFRA.

37.1 Details of the Adur River Restoration Project were published by HDC, 10 October 2022.

37.2 Forming an important part of the Wilder Horsham District initiative, the project "aims to restore nature, reduce flood risks, improve water quality and boost biodiversity in the River Adur area', stretching "from the Knepp estate to Shoreham, where the river meets the Sussex Bay restoration of the sea beds and kelp forests along the Sussex coast". <https://www.horsham.gov.uk/climate-and-environment/news/articles/funding-secured-to-deliver-vital-landscape-recovery-for-river-adur>

38. Sewage and other foul water from the proposed scheme should be treated at the Horsham WTW, not the Barns Green WTW.

In conclusion, for the reasons explained above CPRE Sussex asks that this speculative application, which is being imposed on the community, thereby undermining their Neighbourhood Plan, be refused.

Yours faithfully,

Dr R F Smith, DPhil, BA (Hons), PGCE, FRGS
Trustee CPRE Sussex

Copy to: Chair CPRE Sussex