

[REDACTED]

From: Planning
Sent: 11 February 2026 10:13
Subject: FW: Your Reference: 260130/HB02 EA Planning Reference: HA/2026/127389/01 Planning Application: DC/25/2057
Attachments: Barns Green STW Calculations (Rev F).pdf; BG Sewage Photo Sheet.pdf; EIR 3295-1 (Redacted).pdf; environmental letter on planning portal.pdf

Telephone:
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Horsham District Council, Albery House, Springfield Road, Horsham, West Sussex RH12 2GB
Telephone: 01403 215100 (calls may be recorded) www.horsham.gov.uk Chief Executive: Jane Eaton

[REDACTED]

Sent: 31 January 2026 22:17

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Subject: Your Reference: 260130/HB02 EA Planning Reference: HA/2026/127389/01 Planning Application: DC/25/2057

FOR THE ATTENTION OF: Anna Rabone, Sustainable Places Advisor

Dear Ms Rabone,

ENVIRONMENT AGENCY CONSULTATION RESPONSE – SEWAGE ISSUES NOT ADDRESSED Planning Application DC/25/2057 – Chapel Road, Barns Green

I am writing further to my recent enquiry (your reference 260130/HB02) regarding sewage capacity and pollution issues at Barns Green, and in response to the Environment Agency's formal consultation response to Horsham District Council dated 26 January 2026 (reference HA/2026/127389/01).

I am concerned that the EA's consultation response focuses solely on **groundwater protection and piling conditions**, but makes **no mention whatsoever** of the serious and well-documented sewage overflow problems that are the primary environmental concern for this application.

THE EA'S CONSULTATION RESPONSE

Your letter to Horsham District Council states "no objection" subject to a piling condition to protect the Secondary Aquifer. While groundwater protection is important, this response completely ignores:

- The documented sewage overflow events at Barns Green Wastewater Treatment Works
- The pollution of Parsons Brook and the River Adur
- The "poor ecological status" of the Adur West Water Body catchment
- The question of whether the treatment works can lawfully accommodate additional flows

THE SEWAGE SITUATION – NEW EVIDENCE

Since my original letter, local residents have undertaken detailed analysis of the sewage capacity situation. The findings are extremely concerning and directly relevant to the Environment Agency's regulatory role.

1. Overflow Events Are Increasing

Year	Overflow Events	Duration
2021	40	252 hours
2022	43	410 hours
2023	63	569 hours
2024	60	503 hours

The system is failing more frequently each year, not less.

2. The Treatment Works Already Exceeds EA Consent

A local resident with engineering expertise has calculated the current population served and daily flows to Barns Green Wastewater Treatment Works:

Parameter	Value
EA Consented daily discharge (Dry Weather Flow)	227,000 litres/day
Current estimated daily flow	269,268 litres/day
Currently OVER consent by	18% (42,268 litres/day)
With Miller Homes development	291,708 litres/day
Would be OVER consent by	28% (64,708 litres/day)

The calculations account for:

- 402 pre-Ashmiles dwellings on the combined sewer network (160 litres/head/day + 40% infiltration)
- Post-Ashmiles developments including Sumners Field (125 litres/head/day + 10% infiltration)
- Bluebell Park lodges, glamping, motorhomes, and Oakland Caravan Park

If these calculations are correct, Barns Green WwTW is already operating unlawfully – exceeding its EA consent before any additional development.

3. Southern Water Confirmed No Plans to Upgrade

In April 2025, Southern Water responded to an Environmental Information Request (EIR 3295-1) from a local resident. They confirmed:

- Current population served: 1,018 (local calculations suggest this is a significant underestimate)
- EA consented discharge: 227 m³/day
- "Currently there are no plans to increase the capacity"

4. Pollution Affects Knepp Estate

Overflows from Barns Green WwTW discharge into Parsons Brook, which flows to the River Adur. The Adur West Water Body catchment has "poor ecological status" – partly due to wastewater pollution.

The discharge also affects the Knepp Estate, a nationally significant rewilding project that has received substantial public funding.

5. Photographic Evidence of Unreported Pollution

Local residents have documented pollution incidents at the treatment works that do not appear in the official Event Duration Monitoring data, including:

- Raw unscreened sewage overflowing from manholes
- Sewage running into Parsons Brook
- Badly polluted watercourse

MY QUESTIONS FOR THE ENVIRONMENT AGENCY

Given the above, I respectfully request that the Environment Agency:

1. Reviews its consultation response to Horsham District Council and considers whether sewage capacity should have been addressed
2. Confirms the EA consent for Barns Green WwTW and the current permitted Dry Weather Flow
3. Investigates whether the treatment works is currently exceeding its consent, given the local calculations showing 269,268 litres/day against a consent of 227,000 litres/day
4. Advises whether EA would grant increased consent to accommodate Miller Homes, given:
 - The "poor ecological status" of the receiving waters
 - The increasing frequency of overflow events
 - The impact on the Knepp Estate rewilding project
5. Submits a revised consultation response to Horsham District Council addressing the sewage issues, or confirms that sewage is outside the EA's planning consultation remit (in which case, please explain who is responsible for ensuring the system can cope)
6. Confirms whether the documented overflow events (40-63 per year, 252-569 hours) constitute a breach of the treatment works' environmental permit

ATTACHMENTS

I attach the following documents for your reference:

1. EA Consultation Response (dated 26 January 2026) – showing sewage was not addressed
2. Barns Green STW Calculations – detailed analysis by local resident
3. Southern Water EIR Response (April 2025) – confirming no plans to increase capacity
4. Sewage Photo Sheet – photographic evidence of pollution incidents

CONCLUSION

The Environment Agency's consultation response fails to address the most significant environmental issue associated with this planning application. The sewage system at Barns Green is already failing – with 60+ overflow events per year discharging raw sewage into watercourses flowing to the River Adur and Knepp Estate.

Local calculations suggest the treatment works is already exceeding its EA consent. Approving 68 additional dwellings would make this worse, not better.

I urge the Environment Agency to take this matter seriously and either submit a revised consultation response to Horsham District Council or investigate whether enforcement action is required against Southern Water.

I look forward to your response.

Yours sincerely,

[Redacted Signature]

cc:

- Alice Johnson, Planning Officer, Horsham District Council
- [Redacted]
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-
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Barns Green STW - Calculations at Rev F dated 29/01/2026

Description	Dwellings	Pop Factor	Population	Litres/Head/Day	Litres/Day
Residential Dwellings in Barns Green (Pre-Ashmiles) on Combined Flow Sewer System	402	2.4	965	150	144,720
Add infiltration for 18.5 km Vitreous Clay Sewer Network @ 40%					57,888
Total Daily Flow for Existing Dwellings on Combined Flow Sewer System					202,608
Residential Dwellings in Ashmiles Development on Foul Flow Sewer System	73	2.4	175	125	21,900
Residential Dwellings in Sumners Fields Development on Foul Flow Sewer System	32	2.4	77	125	9,600
Bluebell Park Holiday Lodges on Foul Flow Sewer (Tourist Population - 90% Occupancy)	24	2.0	48	125	6,000
Motorhome/Caravan Pitches and Glamping Pods/Huts (Tourist Population - 50% Occupancy)	63	2.0	126	100	12,600
Oakland Caravan Park on Foul Flow Sewer (Tourist Population - 90% Occupancy)	42	2.0	84	125	10,500
Total Foul Flow of Existing or Under Construction Dwellings on Foul Flow Sewer System					60,600
Add infiltration at 10%					6,060
Total Daily Flow of Existing or Under Construction Dwellings on Foul Flow Sewer System					66,660
Estimated Total Daily Flow (DWF) to Treatment Plant prior to Latest Miller Proposals					269,268
Current EA Consented Daily DWF Discharge to Parsons Brook					227,000
Proposed New Miller Development on Foul Flow Sewer System	68	2.4	163	125	20,400
Add infiltration at 10%					2,040
Estimated Total Daily Flow Generated by Miller Proposals					22,440
Total Estimated Poulation Including the Proposed New Miller Development					1638

**Images of Some Typical and Frequent Pollution Incidents at the Barns Green
Sewage Treatment Plant**



**View of the Incoming Sewer Manhole Located Just Upstream of the Raw Sewage Lift
Pumping Station in the Treatment Plant with Parsons Brook in the Foreground**



**Close-Up of the Manhole with Raw Unscreened and Untreated Sewage Overflowing
and Running Down the Bank and into Parsons Brook**



View of the Parsons Brook Badly Polluted with the Raw Unscreened and Untreated Sewage which then Flows Downstream to the River Adur West



Still from a Video of the Same Manhole on Another Occasion



Still from a Video of the Same Manhole from the Other Bank of Parsons Brook

These are just some of the illustrations of very frequent unrecorded pollution events that occurs every time the raw sewage lift pumps in the adjacent sewage treatment plant fail as a result of blockage, mechanical failure or electrical power failure. There is now a standby power generator installed but on occasions this does not automatically start on power failure. Even when alerted to these issues it can be several days before Southern Water actually respond.



Date

9th April 2025

Contact

Tel 0330 303 0368

Dear

**The Environmental Information Regulations 2004
Request for Information
EIR reference 3295**

Thank you for your request for information which we received on 14th March 2025. We have dealt with your request under The Environmental Information Regulations 2004 (EIR 2004). This letter provides the response to your request, as follows:

Re: Barns Green WwTW, Emms Lane, Barns Green, Horsham, West Sussex, RH13 0QQ

I am a resident of Barns Green Parish Council that HOC are looking into the possibility of various new housing developments in Barns Green and wish to obtain the following information regarding the local wastewater treatment works that serves the village.

I understand through the local

- 1. Confirmation of the current population that forms the basis for the design of the existing treatment works capacity.*
- 2. Confirmation of the current EA consented daily discharge flow of treated effluent to the Parsons Brook.*
- 3. Are Southern Water currently planning to increase the treatment capacity at these works in the near future.*

I look forward to your formal reply to the above enquiries in due course.

We can confirm that Southern Water does hold this type of information you have requested.

- 1. Confirmation of the current population that forms the basis for the design of the existing treatment works capacity.*

The current population supplied by Barnes Green Wastewater Treatment Works (WwTW) is 1018 and with current estimates of daily usage per capita, the treatment works could support a population of roughly 1400 people before the dry weather flow would be over the consented limit.

2. *Confirmation of the current EA consented daily discharge flow of treated effluent to the Parsons Brook.*

The current consented daily discharge flow for Barnes Green WwTW is 227cubic metres/day (m3/d). The Flow to Full Treatment (FFT) is currently 16 litres/second(l/s).

3. *Are Southern Water currently planning to increase the treatment capacity at these works in the near future.*

Currently there are no plans to increase the capacity at the treatment works at Barnes Green. Our Clean Rivers and Seas Plan [southernwater.co.uk/water-for-life/clean-rivers-and-seas-plan/map](https://www.southernwater.co.uk/water-for-life/clean-rivers-and-seas-plan/map) does, however, provide details of all the Wastewater Treatment Works , Wastewater Pumping Stations and overflows for our region, what investment is required at each site, when the work is planned to commence and what solutions are required.

Through our new Drainage and Wastewater Management Plan (DWMP) process, which is currently underway, we are also working with stakeholders to better understand the range of flooding risks in drainage catchments across our region, to try to work towards a more collaborative and sustainable approach to managing surface water. Key to this is preventing rainwater from entering our foul network, in order to free up sewer capacity for new development, whilst minimising the risk of foul flooding. For more information please visit our website: [Arun And Western Streams River Basin Catchment](#)

We are entitled to make a reasonable charge for information provided under the Regulations. Details of our charging scheme can be found on our website: <https://www.southernwater.co.uk/water-for-life/protecting-the-environment/environmental-information>. In this case we have decided to waive our charge.

If you are dissatisfied with the handling of your request, you have the right to ask for an internal review. Internal review requests should be submitted within forty working days of the date of receipt of this response and should be addressed to Head of Legal, Southern Water Services Ltd, Southern House, Yeoman Road, Worthing, West Sussex BN13 3NX or you can email EIR.Internal.Review@southernwater.co.uk.

If you are dissatisfied with the outcome of the internal review, you can apply, without charge, to the Information Commissioner, who will consider whether Southern Water has complied with its obligations under the Regulations, and can require Southern Water to remedy any problems. You can find out more about how to do this, and about the Regulations in general, on the Information Commissioner's website at: www.ico.org.uk. Complaints to the Information Commissioner can be made via the "report a concern" section of the Information Commissioner's website.

Please do not hesitate to contact us if you have any queries.

Yours sincerely

EIR Officer

Horsham District Council
Planning team
Park House
North Street
Horsham
West Sussex
RH12 1RL

Our ref: HA/2026/127389/01
Your ref: DC/25/2057
Date: 26 January 2026

Dear Planning team (FAO: Alice Johnson),

PROPOSED DEVELOPMENT OF 68 DWELLINGS WITH VEHICULAR AND PEDESTRIAN ACCESSES, PUBLIC OPEN SPACE, HARD AND SOFT LANDSCAPING AND ASSOCIATED WORKS INCLUDING SUPPORTING FOUL AND SURFACE WATER DRAINAGE WORKS, AND WORKS TO EXISTING CULVERTED WATERCOURSE ON SITE.

LAND NORTH OF LITTLE SLAUGHTERFORD, CHAPEL ROAD, BARNS GREEN, WEST SUSSEX.

Thank you for the consulting the Environment Agency on the above application.

We have reviewed the information as submitted and set out our position and comments below.

Environment Agency position

We have **no objection** to the proposal **provided that the following condition be attached to any planning permission granted**, and that the details in relation to the condition be submitted and approved by the Local Planning Authority.

Condition – Piling

The piling and other foundation designs using penetrative methods hereby permitted may not commence until such time as a scheme has been submitted to, and approved in writing by, the Local Planning Authority.

The scheme shall be based on the information submitted as part of the application and, where necessary, supported by:

- **A Foundation Works Risk Assessment.**
- **A conceptual site model.**
- **Specification of the type, number and depth of proposed piles / foundations / dimensions of shaft / tunnel / design of heating and cooling system.**

The scheme shall be fully implemented and subsequently maintained, in accordance with the timing/phasing arrangements contained in the scheme, or any details as may subsequently be agreed, in writing, by the Local Planning Authority.

Reasons for condition

Piling and other foundation designs using penetrative methods can result in risks to potable supplies from, for example, pollution/turbidity, risk of mobilising contamination, drilling through different aquifers and creating preferential pathways. Groundwater is particularly sensitive in this location because the proposed development site is within Source Protection Zone 2 and located upon Secondary Aquifer A.

In light of the above, the proposed development will only be acceptable if a planning condition controlling disturbance of the aquifer is imposed. Without this condition we would object to the proposed development in line with paragraph 187 of the National Planning Policy Framework because it cannot be guaranteed that the development will not present unacceptable risks to groundwater resources.

Advice to the Applicant

Discharge of treated sewage effluent

The discharge of domestic sewage may be subject to General Binding Rules (GBRs) under the Environmental Permitting (England & Wales) Regulations 2016, which provides a statutory baseline of good practice. You can find more information online at <https://www.gov.uk/permits-you-need-for-septic-tanks/permits> or contact the Environment Agency (our National Customer Contact Centre can be contacted on **03708 506 506** (Monday to Friday 8am to 6pm) or by emailing enquiries@environment-agency.gov.uk). If your proposal cannot meet the GBRs, then a permit from us will likely be required.

Waste on-site

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the environmental permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays (our National Customer Contact Centre can be contacted on **03708 506 506** (Monday to Friday 8am to 6pm) or by emailing enquiries@environment-agency.gov.uk).

We recommend that developers should refer to the [waste management](#) page on GOV.UK.

We will consider any queries in relation to the use of [Definition of Waste: Development Industry Code of Practice \(DoWCoP\)](#) (which is to be updated) through our environmental permitting enhanced pre-application advice service, considering site conditions, the materials that are proposed to be used, and the potential for harm to the environment and to human health. We can also provide advice as to whether an environmental permit is required.

Waste to be taken off-site

Contaminated soil that is (or must be) disposed of, is waste. Therefore, its handling, transport, treatment and disposal are subject to waste management legislation, which includes:

- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2016
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with [British Standard BS EN 14899:2005 'Characterization of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan'](#) and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays (our National Customer Contact Centre can be contacted on **03708 506 506** (Monday to Friday 8am to 6pm) or by emailing enquiries@environment-agency.gov.uk).

If the total quantity of hazardous waste material produced or taken off site is 500kg or greater in any 12-month period, the developer will need to register with us as a hazardous waste producer. Refer to the [hazardous waste](#) pages on GOV.UK for more information.

If you have any queries regarding the above information, please do not hesitate to contact the advisor identified below.

Yours faithfully,

Environment Agency – Solent & South Downs

Sustainable Places Advisor: Anna Rabone

[Redacted signature]

[Redacted contact information]