
From: Planning@horsham.gov.uk
Sent: 24 March 2026 11:52
To: Planning
Subject: Comments for Planning Application DC/26/0366

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 24/03/2026 11:52 AM.

Application Summary

Address: Land North West of Southwater

Proposal: 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.

Case Officer: Matthew Porter

[Click for further information](#)

Customer Details

Address: 9 King Edward Close Horsham

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment:

- Highway Access and Parking
- Loss of General Amenity
- Overdevelopment
- Trees and Landscaping

Comments: I object to the development for the following reasons:

1. Direct Conflict with an Adopted Neighbourhood Plan (NPPF Para. 14): The Southwater Neighbourhood Plan was passed by democratic referendum in June 2021, setting a housing limit of 420-460 homes. Berkeley Homes is now proposing 1,000 homes - a 117% breach of

that limit. Under NPPF paragraph 14, where a proposal conflicts with an up-to-date Neighbourhood Plan, permission should not normally be granted. The plan is only five years old and carries full legal weight. The Neighbourhood Plan also contains policy SNP1.1(a) requiring Southwater to remain a single-centre village focused on Lintot Square. Berkeley Homes' proposal includes a substantial new commercial hub - effectively creating a second village centre, directly contradicting this policy. In December 2025, Southwater Parish Council voted to begin a full review of the Neighbourhood Plan. Approving 1,000 homes before that review is complete would pre-empt and undermine the democratic process the Localism Act 2011 is designed to protect.

2. No Cumulative Infrastructure Assessment (NPPF Sustainable Development Test) - Around 350 homes are already under construction at Broadacres, and approximately 800 more have planning permission at the Horsham Golf Club site - totalling 1,150 committed homes before Berkeley's proposal is considered. Adding 1,000 more brings the cumulative total to over 2,150 new homes, yet no joined-up infrastructure assessment covering all three developments has been carried out. This is a legal requirement. When Berkeley Homes' previous 1,500-home application was refused, cumulative infrastructure impact was cited as a key reason. That infrastructure position has got worse since 2023, not better.

3. Sewage Treatment Capacity - Berkeley Homes' own Flood Risk Assessment and Outline Drainage Strategy (dated 27/02/2026, para. 11.1.3; Annex H) confirms that foul sewage from the development would be treated at Barns Green Wastewater Treatment Works. Whilst Southern Water has said it intends to increase capacity, this is not guaranteed and it projected to take a minimum of 2 years - potentially much longer. Granting permission now before any works have been completed risks severe additional load being placed on the system before it can cope, with a real and foreseeable risk of sewage discharging into local watercourses. Southern Water pleaded guilty in 2020 to 51 criminal offences of deliberately dumping untreated sewage - described by the Environment Agency as the worst case in its history - and was fined £90 million. The fact that it is currently appealing Ofwat's requirement to raise investment creates serious doubt about whether committed upgrades will be delivered or not.

4. Ancient Woodland - Near-Absolute NPPF Protection (Para. 186c): Courtland Wood and Smith's Copse - both designated ancient woodlands - lie immediately adjacent to the proposed development. Under NPPF paragraph 186c, development that would damage ancient woodland must be refused unless wholly exceptional circumstances exist. No independent hydrological assessment of drainage impacts on these woodlands has been submitted. Large-scale drainage engineering on Weald Clay can alter groundwater levels across a wide area, damaging root systems without physically entering the woodland. This is a strong protection in law, and the absence of an independent assessment is a clear evidential gap.

5. Incomplete Ecological Surveys - Legal Requirement Cannot Be Deferred: Planning law requires that the impact on protected wildlife must be fully assessed before planning permission is granted. Berkeley Homes is seeking to defer wildlife surveys until after approval - which is not legally permitted.

[REDACTED]

[REDACTED]

6. Mandatory 10% Biodiversity Net Gain - Not Credibly Demonstrated: Under the Environment Act 2021, all major applications must achieve a minimum 10% Biodiversity Net Gain. On a Weald Clay site with two immediately adjacent ancient woodlands and substantial drainage engineering constraints, achieving meaningful biodiversity gain locally is particularly difficult. There is a real risk Berkeley Homes would rely on purchasing remote 'biodiversity credits,' meaning the local area ends up as an ecological desert while paperwork records a gain elsewhere. No credible, independently verified biodiversity net gain strategy has been submitted.

7. Water Supply - Flawed Evidence Base and Formal Maladministration Complaint: HDC uses an assumed consumption figure of 110 litres per person per day as its monitoring baseline - but this is an aspirational Environment Agency target for 2050, not a measure of current consumption. Southern Water's own published data for April 2025-March 2026 records actual average consumption at approximately 335 litres per day for an average 2.5-person

household - a 21% discrepancy from HDC's assumption. This error has been raised with HDC and is the subject of a formal maladministration complaint. An evidence base that is the subject of a live maladministration complaint and is demonstrably misaligned with the water company's own published figures provides must not be used to approve a large scale development.

8. Highway Safety - Fundamental Flaw in Traffic Assessment: Berkeley Homes' transport assessment claims the new secondary school would generate minimal traffic on the basis that pupils will walk or cycle. However, the A24 dual carriageway lies between the school and the 800-home Horsham Golf Club development from which many pupils would come. There is no safe pedestrian or cycle crossing at a suitable point. Without a grade-separated crossing, which Berkeley Homes has not committed to fund, the walking and cycling projections are unworkable and create a foreseeable child safety risk. West Sussex County Council Highways raised unresolved objections on traffic grounds to the previous 1,500-home application. Those concerns were never resolved.

9. Brownfield-First Principle - Greenfield Not Justified: HDC's own December 2024 Brownfield Register identifies 18 brownfield sites across the district with a combined capacity of over 800 dwellings. Berkeley Homes is seeking permission for 1,000 homes on a single greenfield site - more than the entire district brownfield supply. The former Novartis pharmaceutical site in North Horsham already has planning permission for 244 affordable homes and is better located near rail services and employment. There is no evidence that the brownfield pipeline has been exhausted before this greenfield release is proposed.

Kind regards

Telephone:

Email: planning@horsham.gov.uk



**Horsham
District
Council**



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