

[REDACTED]
Sent: 09 March 2026 19:27

To: Alice.Johnson [REDACTED]

Cc: Planning [REDACTED]; [REDACTED]

Subject: Re: Planning Application DC/25/2057 Location: Land North of Little Slaughterford, Chapel Road, Barns Green

Material Planning Consideration — Cumulative Sewage Impact on Barns Green WwTW
Planning Applications: [Insert Barns Green reference] and DC/26/0366

Dear Alice,

I am writing to bring to your attention a material planning consideration that affects the determination of planning application DC/25/2057 and which also has significant implications for planning application DC/26/0366 (Land North West of Southwater).

CUMULATIVE IMPACT ON BARNS GREEN WwTW

It has come to our attention that planning application DC/26/0366, for approximately 1,000 dwellings on Land North West of Southwater, proposes to direct foul sewage to Barns Green Wastewater Treatment Works (WwTW).

The applicant's Environmental Statement (Volume II, Appendix 13.1 — Flood Risk Assessment and Outline Drainage Strategy, February 2026) confirms at Paragraph 11.1.3:

"The nearest point of connection with capacity currently is some 2km South West of the Site at Barns Green WWTW."

Southern Water has confirmed in writing to the applicant's consultant (WSP) at Annex H:

"There is currently inadequate capacity within the foul sewerage network to accommodate a split foul flow of 6.25 l/s and 10.69 l/s... The proposed development would increase flows to the public sewerage system which may increase the risk of flooding to existing properties and land."

THE SCALE OF THE PROPOSED INCREASE

Barns Green WwTW is a small village-scale treatment works:

- Current Population Equivalent: approximately 1,003
- Current Dry Weather Flow: approximately 227,000 litres per day
- Proposed additional DWF from DC/26/0366: minimum 330,000 litres per day
- Percentage increase: 145% — more than doubling the current load

This is before any additional flows from the proposed Barns Green development [insert reference] are taken into account.

EXISTING FAILURES AT BARNS GREEN WwTW

Barns Green WwTW already has a severe and worsening record of raw sewage discharges into Parsons Brook (a tributary of the River Adur):

Year	Sewage Spills	Hours of Discharge
2021	40	252 hours
2022	43	411 hours
2023	63	569 hours
2024	60	502 hours
Total	206 spills	1,734 hours (72 days)

Southern Water's own records for 2024 state "No Improvement Action In Reporting Period."

MATERIAL PLANNING CONSIDERATION

We submit that the cumulative sewage impact of both planning applications on Barns Green WwTW is a material planning consideration that must be addressed before either application can be properly determined. Specifically:

1. No cumulative impact assessment has been carried out for either application regarding the combined effect on Barns Green WwTW, Parsons Brook or the River Adur
2. Southern Water has confirmed inadequate capacity — yet both applications propose to rely on the same failing infrastructure
3. The Adur West Water Body already has "poor ecological status" with wastewater/sewage pollution identified as a contributing factor. Additional loading would be contrary to Water Framework Directive objectives
4. Horsham New WwTW has received a £31 million upgrade (completed spring 2025) designed for a 2035 Population Equivalent of 93,345 to accommodate growth in the Horsham catchment. It is located in proximity to the DC/26/0366 site. We question why this major upgraded facility has not been considered as the receiving works
5. Southern Water has not responded to the Council's challenge regarding sewage capacity for our Barns Green application [insert reference], which may now be explained by the scale of the infrastructure crisis identified above

REQUEST

We respectfully request that:

1. Both applications be assessed cumulatively in respect of their impact on Barns Green WwTW, Parsons Brook and the River Adur
2. Southern Water be required to provide a definitive response on capacity at Barns Green WwTW before either application is determined
3. The Environment Agency be consulted specifically on the cumulative sewage impact

4. Neither application proceeds to determination until a satisfactory assessment of sewage infrastructure capacity has been provided

This is a matter of significant public and environmental concern. Over 400 representations have been received on the Barns Green application alone, many citing sewage infrastructure as a key issue.

Yours faithfully,

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