

From: Planning@horsham.gov.uk <Planning@horsham.gov.uk>
Sent: 16 March 2026 16:20:06 UTC+00:00
To: "Planning" <planning@horsham.gov.uk>
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 16/03/2026 4:20 PM.

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

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Customer Details

Address: 4 Courtlands Southwater Horsham

Comments Details

Commenter Type: Consultee

Stance: Customer objects to the Planning Application

Reasons for comment:

- Loss of General Amenity
- Overdevelopment

Comments:

I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater on the grounds that the water demand calculations used to justify the development are based on unrealistic assumptions that do not reflect how people live. The water usage forecasts underpinning this development assume significant future reductions in per-household water consumption - reductions that have not been achieved in practice and are unlikely to be achieved through current measures. HDC's own monitoring methodology compounds this problem severely. The Council's Planning Policy Team Leader has confirmed that HDC uses an assumed consumption figure of 110 litres per person per day (lpppd) as its monitoring baseline, described as being in line with Building Regulations for a water-stressed area. This figure is not a measure of current consumption. It is an aspirational target set by the Environment Agency for achievement by 2050 and using it as though it reflects present-day reality is a fundamental methodological error.

Southern Water's own published data for April 2025 to March 2026 records actual average consumption as: 232 litres per day for single occupancy households; 301 litres per day for dual occupancy households; and approximately 335 litres per day for an average 2.5-person household. HDC's assumption of 110 lpppd equates to approximately 275 litres per day for a 2.5-person household - against Southern Water's actual recorded figure of approximately 335 litres per day. That is a discrepancy of approximately 60 litres per household per day, representing an underestimate of around 21%. The result is that HDC is systematically and materially underestimating actual demand on Southern Water's network when assessing whether new development can be supported. We have direct local evidence that confirms this gap between assumption and reality. Residents on the recently built Berkeley Homes Broadacres estate - just down the road - have already removed the water-saving restrictors from their taps and showers because water pressure and volume with them installed was inadequate for normal household use. Save Rural Southwater conducted its own sample survey of actual consumption at Broadacres - properties equipped with water-efficient fittings - which recorded average daily consumption of approximately 200 lpppd, nearly double the Council's monitoring assumption. Both HDC and

Southern Water declined invitations to conduct a similar exercise themselves. This error was raised explicitly with HDC, supported by Southern Water's own published data. Despite being informed that its methodology is in error by approximately 21%, the Council has confirmed it intends to continue using this figure. Save Rural Southwater has raised this as a formal maladministration complaint. The Council is on notice that its monitoring methodology is both technically wrong and the subject of an active formal complaint - and yet it continues to rely on it as a basis for approving major new development. Proposed changes to Building Regulations (Part G) would, if implemented, save approximately 20 litres per person per day. For a development of 1,000 homes with approximately 2,500 residents, that is 50,000 litres per day - a meaningful saving, but not remotely enough to close the supply gap created by the development itself, particularly given that actual consumption at comparable new-build properties is running at nearly double the Council's assumed baseline. Groundwater abstraction at Hardham - a key source for this area - is already at levels that risk long-term ecological damage to a designated SSSI. Increasing demand from 1,000 new homes will only make this worse. The combined picture - a flawed monitoring methodology, actual consumption running far above assumed figures, a regulator declining to verify its own data, and a key abstraction source already under ecological stress - makes it impossible to conclude that water supply infrastructure can reliably support this development. I ask that the Berkeley Homes 1,000-home proposal be refused until the water demand calculations are independently verified against actual usage data from comparable recent developments - including the Broadacres estate - rather than on theoretical modelling.

Kind regards

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