



The countryside charity
Sussex

CPRE Sussex
Brownings Farm
Blackboys
East Sussex TN22 5HG
Telephone 01825 890975
info@cpresussex.org.uk
www.cpresussex.org.uk

Horsham District Local Plan 2023-40 Consultation (Regulation 19)

CPRE Sussex response to:

STRATEGIC POLICY 23: INFRASTRUCTURE PROVISION

CPRE Sussex is concerned that the plan does not have a Strategic Policy requiring the timely provision of wastewater treatment works (WwTW) and infrastructure, with the capacity to treat sewage and wastewater generated by all the development proposed by the Regulation 19 HDLP, without storm overflows and spillage of raw and partially treated sewage. Strategic Policy 23: Infrastructure Provision, for example, does not stipulate this essential requirement.

This omission is especially surprising because the need for timely provision is recognised and acknowledged in the plan, as follows:

1. Chapter 5: Climate Change and Water stipulates at page 38 that

‘Any development proposals will need to consider the capacity of existing wastewater treatment works and the ability of these sites to expand in the future’ (seventh bullet).

2. Chapter 6: Conserving and Enhancing the Natural Environment states at page 54 that

‘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 and that enhancements are made where possible (fifth bullet).

3. Chapter 8: Infrastructure, Transport and Healthy Communities, page 85, first bullet, states that ‘Community consultation and feedback shows that the shortfall in existing infrastructure is already a significant issue. New development must be supported by necessary infrastructure (e.g., schools, roads, health care, sewage) to prevent any worsening of these issues. These include a need to upgrade the transport infrastructure, wastewater treatment, health care provision and to ensure there is sufficient provision of school places for all children’.

4. The HDLP Sustainability Appraisal Update, December 2023, states that large scale development East of Billingshurst, Strategic Policy HA4 ‘ (650 new homes) could have implications’ for the capacity of existing WwTW infrastructure.

4.1 The Billingshurst Wastewater Treatment Works (WwTW) in 2022 spilled storm overflow 45 times for a total of 581.85 hours into the Par Brook, a tributary of the River Arun.

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4.1.1 According to Souther Water's Clean Rivers and Seas Plan, work to upgrade the Billingshurst WwTW is planned to commence between 2025 – 30. Note 'commence'.

southernwater.co.uk/water-for-life/clean-rivers-and-seas-plan/map

4.2. Storm overflow from the Land adjacent Billingshurst Pump Station, in 2022, spilled 14 times for a total of 71.81 hours, discharging into the Par Brook, a tributary of the River Arun.

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4.2.1 According to Southern Water's Clean Rivers Plan, the Pump Station will be upgraded after 2030.

5. Strategic Policy HA2: Land West of Ifield: 10. stipulates that 'Close liaison with water treatment utilities companies must be undertaken, including clear agreements on the phasing of development, to ensure that a new or expanded Wastewater Treatment Works (WwTW) is provided to provide timely additional capacity for the sewerage network'.

6. Draft Crawley Borough Local Plan 2024 – 2040 May 2023 for Submission Publication Consultation: May – June 2023, paragraph 8.11 advises that:

- 'Wastewater/Sewage Treatment Works upgrades take longer to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years to plan, design, obtain approvals and build.
- 'in the event of an upgrade to sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade'.
- 'As a developer has the automatic right to connect to the sewer network under the Water Industry Act, the Infrastructure Provider may request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and/or water pollution'.
- 'In case of major development, it is strongly recommended that developers engage with Thames Water, as the wastewater infrastructure provider, at the earliest opportunity to establish: • the development's demand for wastewater/sewage treatment and network infrastructure, both on and off site, and whether it can be met; and; • what loading/flow from the development is anticipated'.

This advice is highly relevant and therefore applicable to the Horsham District Local Plan, too.

Conclusion

7. In view of the above, CPRE Sussex considers that to avoid and prevent pollution of water courses and river catchments, a Strategic Plan Policy specifying and requiring the timely upgrading and delivery of WwTW and infrastructure with the capacity to treat sewage and wastewater generated by development planned for 2023-2040 must be provided and included in the plan.

8. Regulation 19 HDLP, paragraph 8.6 states, but not in a policy, that

'In order to address wastewater treatment capacity, developers are encouraged to contact the water/wastewater infrastructure provider as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint, the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development'.

9. CPRE Sussex recommends that to give this essential requirement more weight and clarity the contents of paragraph 8.6 be stipulated in a strategic policy, Strategic Policy 23: Infrastructure Provision, reinforced with the requirement that:

'New or upgraded expanded WwTR must have the capacity and capability needed to treat wastewater without storm overflows and spillage of raw and partially treated sewage'.

Dr R F Smith

Trustee CPRE Sussex