



The countryside charity
Sussex

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

CPRE Sussex response objecting to:

STRATEGIC POLICY HA3: LAND NORTH WEST OF SOUTHWATER

CPRE Sussex does not support this Strategic Policy and allocation for the reasons explained below.

1. Southwater is already having to accommodate and assimilate large developments including the building-out of extant permissions, and unplanned-for-development imposed on the community by developers.

2. The impact that the imposition of 550 residential units, in addition to the 450 allocated in Southwater's Neighbourhood Plan, would have on the stability and cohesion of the community should be significant planning concerns.

2.1 HDC's Regulation 19 HDLP acknowledges that Southwater has 'accommodated large developments in recent years' and that 'care needs to be taken to ensure communities can absorb changes that have taken place to allow stable, cohesive communities' (Chapter 10: Housing, page 127, 5th bullet).

Adur catchment at risk

3. While Strategic Policy HA2: Land West of Ifield 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', Strategic Policy HA3: Land North West of Southwater does not.

3.1 This omission is surprising, considering Southern Water's letter, dated 17/01/2023, to Directorate of Planning, HDC, re DC/22/1916 Land North West of Southwater.

3.2 The letter advised that sewerage flows from the proposed development may lead to an increased risk of foul water flooding from the sewer network, which may need to be reinforced in consequence – with implications for the capacity of existing WwTW infrastructure.

3.3 Furthermore, DC/22/1916 Land North West of Southwater identified the Barns Green WwTW as 'the nearest point where capacity is currently available for reception of flows from the Proposed Development', but omitted to mention that in 2021 storm overflows of untreated sewage from the WwTW spilled 40 times/252 hours in 2021, and 43 times/410.85 hours in 2022, discharging into the adjacent Parsons Brook - and the

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Adur West Water Body catchment. The catchment has a 'poor ecological status', apparently due in large part to pollution from wastewater /sewage discharge.

3.4 The Regulation 19 HDLP states 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' (Chapter 6: Conserving and Enhancing the Natural Environment, 5th bullet, page 54).

[Adur West | Catchment Data Explorer | Catchment Data Explorer](#)

3.5 Sewage received from Land North West of Southwater would add to overflows of untreated sewage from the Barns Green WwTW, and worsen the Adur's existing pollution problem, to the detriment of the Adur River Project - one of only 22 nationwide projects to receive funding (£500,000) from DEFRA.

3.6 According to Souther Water's Clean Rivers and Seas Plan, an upgrade of the Barns Green WwTW is planned to commence 'after 2030'.

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

3.7 Close and timely 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), with the capacity and capability needed to prevent storm overflows and spillage of raw and partially treated sewage into the Adur catchment, is in place ahead of development.

3.8 This essential requirement should be stipulated in Strategic Policy HA3: Land North West of Southwater.

Water Neutrality

4. In respect of DC/22/2016 Land West of Southwater, the Water Reduction Strategy submitted by the applicant advised, under the heading 'Base Line Water Demand', that as the site is largely a greenfield site and no known water uses are known to be present (e.g., irrigation), the baseline consumption is zero litres/person/day. Therefore, to achieve water neutrality, the water consumption for the proposed site must be less than or equal to this (paragraph 2.2).

4.1 The application was withdrawn.

Will the development deliver a minimum of 35% affordable homes?

5. Will the development deliver a minimum of 35% affordable homes, in accordance with a yet to be agreed 'comprehensive master plan' (Strategic Policy HA2: 2 a)?

5.1. Might viability be an issue for the development, as it was and continues to be for Land North of Horsham, which instead of the HDPF requirement for 35% affordable housing is delivering around 18% - on grounds of viability?

5.2. Regulation 18 Horsham District Local Plan 2019 – 38: Land West of Southwater stated that whilst a "commitment to providing affordable housing" on the site is "identified" by the developer, "the level is not specified" (page 99).

Will the development make maximum use of on-site renewable energy technologies, including roof and/or wall solar photovoltaic panels?

6. Will the development make maximum use of on-site renewable energy sources in accordance with the yet-to-be agreed master plan (Strategic Policy HA2: 5, and will these renewable energy sources include roof- and/or wall-mounted solar photovoltaic panels?

6.1 Regulation 18 Horsham District Local Plan 2019 – 38: Land West of Southwater advised that the “potential for alternative energy sources is not indicated”.

6.2 Development Land West of Southwater has not delivered new=builds equipped with roof or wall mounted solar PV.

CPRE Sussex asks that Strategic Policy HA3 stipulate that the development is to deliver homes with roof and/wall mounted solar photovoltaic panels.

7. CPRE Sussex asks that Strategic Policy HA3 stipulate that the development is to deliver homes with roof and/wall mounted solar photovoltaic panels.

7.1 West Sussex County Council has advised in their *Solar Together* initiative that “By generating electricity from the sun, you could reduce your annual carbon emissions by approximately one tonne each year and help West Sussex to become carbon neutral”.

<https://solartogether.co.uk/westsussex/blog/best-ways-to-increase-solar-self-consumption>

7.2 Researchers at Oxford University found that UK households with solar PV self-consume 45% of their own solar generation on average and reduce annual electricity demand from the grid by 24%. With additional adjustments, this reduction of 24% can be increased to over 35% (E. Mckenna, J. Pless, and Darby, S: Solar photovoltaic self-consumption in the UK residential sector: New estimates from a smart grid demonstration project. Energy Policy Volume 118, July 2018, pagesc482 – 491).

Conclusion

8. Soutwater’s Neighbourhood Plan has identified and allocated a site for 450 dwellings. Strategic Policy HA3 proposes an additional additional 550 dwellings. For the reasons explained above we ask that Strategic Policy HA3’s additional 550 dwellings be rejected, or put on hold, with no development before a new or expanded WwTW, with the capacity and capability needed to prevent outflows and spillage, is in place.

Dr R F Smith

Trustee CPRE Sussex