



The countryside charity
Sussex

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

CPRE Sussex response, objecting to:

STRATEGIC POLICY HA4: LAND EAST OF BILLINGSHURST

CPRE Sussex does not support Strategic Policy HA4: Land East of Billingshurst for the reasons explained below.

1. Strategic Policy HA4 is not supported by Billingshurst Parish Council.
2. Billingshurst has accommodated large developments in recent years, including unplanned-for-development imposed on the community by developers.
 - 2.1. Consequently, Billingshurst has and is experiencing a substantial increase in its built area and population.
3. HDC's Regulation 19 HDLP acknowledges that Billingshurst 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).
4. The impact that the imposition of at least 650 residential units by 2040 would have on the stability and cohesion of the community should be significant planning concerns.

Protecting the Arun Catchment from wastewater overflows and spillage

5. The HDLP Sustainability Appraisal Update, December 2023, states that large scale development East of Billingshurst, Policy HA4 'could have implications' for the capacity of existing WwTW infrastructure.
6. 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.

[Raw sewage in our rivers | The Rivers Trust](#)

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President: Lord Egremont

Campaign to Protect Rural England Sussex Branch CIO | Registered charity number: 1156568

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6.1 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’.

6.2 Will the upgrade of the Billingshurst WwTW be completed by 2030?

6.3 Will the upgrade prevent storm overflows and spillage of partially treated and raw sewage into the Arun catchment?

7. 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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7.1 According to Southern Water’s Clean Rivers Plan, the Pump Station will be upgraded after 2030.

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

7.2 When after 2030 will the Pump Station be upgraded?

7.3 Will the upgrade prevent storm overflows and spillage of partially treated and raw sewage into the Arun catchment?

8. The 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’.

- ‘it is strongly recommended that developers engage with 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’.

9. Natural England’s concerns and advice regarding the Arun Vally SAC SAC/SPA and Ramsar, and SSSI, set out in its Horsham Local Plan Regulation 18

Consultation and Habitats Regulations Screening Assessment, dated 30 March 2020, page 4, includes the statement that

‘In summary should our assessment confirm that this site is failing its water quality objectives this will require Plans and Projects to be assessed in line with the Dutch Nitrogen ECJ’.

‘With respect to your Plan this means that any development coming forward that uses WwTW which outfalls into the catchment of the river Arun, must provide robust mitigation including strategic solutions such as nutrient neutrality, to ensure the proposed growth has the potential to meet the legislative tests’.

10. Accordingly, would Strategic Policy HA4: Land East of Billingshurst provide robust mitigation to ensure the proposed growth has the potential to meet the legislative tests?

11. Table 6: Employment Site Allocations: Site EM3 - Land at Broomers Hill Business Park, Pulborough: 2.7ha is allocated for B2, B8 and ancillary office / E(g) uses (c. 7,000sqm (about twice the area of a large mansion) in total) as an expansion of the existing employment site, includes the stipulation that ‘Appropriate regard will need to be given to any potential impacts from surface water and waste water on the Arun SSSI’.

12. It is therefore cause for considerable concern that Strategic Policy HA4: Land East of Billingshurst does not stipulate that ‘Appropriate regard will need to be given to any potential impacts from surface and wastewater on the Arun SSSI’.

13. To address this crucial issue, Strategic Policy HA4: Land East of Billingshurst should stipulate 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 Arun catchment, is in place ahead of development.

14. In the meantime, to protect the Arun catchment there should be no more development at Billingshurst before the additional capacity and capability needed to treat wastewater and sewage without outflow spillage has been provided.

For and on behalf of CPRE Sussex

Dr R F Smith, Trustee CPRE Sussex