



The countryside charity
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Attn: Case Officer Ms Alice Johnson

Horsham District Council
Albery House
Springfield Road
Horsham
West Sussex
RH12 2GB

5 February 2026

Dear Ms Johnson,

CPRE Sussex representation OBJECTING to

DC/25/2057

Land North of Little Slaughterford Chapel Road Barns Green West Sussex

Proposed development of 68 dwellings with vehicular and pedestrian accesses, public open space, hard and soft landscaping and associated works including supporting foul and surface water drainage works, and works to existing culverted watercourse on site

CPRE Sussex objects to this application for the reasons explained below.

1. The Application is not supported by Itchingfield Parish Council.
2. The application is contrary to HDPF Policies 1,2,3,4 and 26, and full compliance with HDPF Policy 16: Strategic Policy Meeting Local Housing Need, regarding the provision of affordable homes, is not assured. Likewise, the requirement for development without increasing flood risk elsewhere stipulated in Policy 38 Strategic Policy Flooding, and NPPF 178 b.
3. The HDC SHELAA Housing Land Report by Parish, December 2018: Itchingfield Parish: Site Reference SA006, Land South of Smugglers Lane, found that the Site was “Not Currently Developable”, and “Unless allocated for development through the review of the Horsham District Planning Framework 2015 (HDPF) or via a made Neighbourhood Plan, it is considered development would be contrary to Policies 1 to 4 and 26 of the HDPF. **In addition, this site, although located adjacent to the settlement edge, is not well related to the built form of the village”.**

3.1 The Site, 'Land South of Smugglers Lane', is now described by the applicant as 'Land North of Little Slaughtered Chapel Road Barns Green West Sussex'.

4. The Site was not allocated to the Barns Green and Itchingfield Neighbourhood Plan 2024 - 2031.

4.1 The Site was put forward by the applicant for inclusion in the Neighbourhood Plan. The proposed allocation was rejected.

5. Notwithstanding this rejection, HDC allocated the Site for 50 homes, within their Regulation 19 Horsham District Local Plan 2023 – 2040 (HDLP) under Policy HA6 Barns Green Housing Allocation: BGR1.

6. The Examination in Public (EiP) of the Plan, which commenced on 10 Dec 24, was suspended after only three days (10th, 11th and 12th Dec 24) by the examining inspector and was subsequently rejected by him.

6.1 Consequently whether the allocation of the Site to the HDLP was justified, effective, consistent with national policy and positively prepared was neither considered nor determined at and by the EiP.

6.2 This reality is omitted from the applicant's planning statement.

7. HDC advise in a letter re the Site, dated 18 July 2025, to Mr Nick Billington SLR Consulting Mountbatten House Southampton Hampshire SO15 2JU, (HDC Reference: PE/25/0088), that **"at this stage no formal decision on whether to withdraw the HDLP has been made, therefore the plan continues to carry limited weight, however in the event the plan is withdrawn it will carry no weight"**.

8. In the Appeal Dismissal- Appeal Ref: APP/Z3825/W/24/3350094 Land to the West of Storrington Road, Thakeham (Decision date 13 June 2025) the Inspector advised that In its Addendum SoC, Horsham District Council "indicated that progress on the HDLP had halted in early 2025 and would not be likely to resume in the near future. As such, **the Council state that no weight should be attached to the HDLP's emerging policies**".

9. The Sustainability Appraisal of the Horsham District Local Plan (Regulation 19) July 2021, Chapter 8, advises re BGR: Land South of Smugglers Lane, 3.3 hectares (50 homes) (appraised as site option SA006), BGR2: Land South of Muntham Drive, 1.85 hectares (25 homes) (appraised as site option SA510), and BGR3: Land at Slaughterford Farm (Sumners Pond), 1.5 hectares (30 homes) (appraised as site option SA613) that:

- The development of these "three sites allocated at Barns Green would result in a significant increase in development to the west of the settlement".

- “An increase of this size to the settlement boundary could have implications for the established character of Barns Green as well as that of the surrounding landscape. Sites BGR1 and BGR2 are located on land that has been assessed as having low-moderate landscape capacity for medium scale housing development”.

- “The relatively limited capacity for housing growth at these sites could increase the potential for adverse effects of this nature” (paragraph 8.393).

10. Although the Site was allocated by HDC to the HDLP for 50 homes, the applicant is now seeking to build 68 homes there. An increase of 36%.

11. DC/25/2057, if permitted, would be detrimental to the established character of Barns Green as well as that of the surrounding landscape. It is not well related to the built form of the rural village.

Surface Water Flooding – homes and buildings on the east side of Chapel Road opposite the Site, including Grade II Listed Buildings, at risk

12 a In summary, the effectiveness of the proposed design and mitigation measures in preventing surface water from the Site causing flooding off-site for the lifetime of the development (a minimum of 100 years) is not assured.

12 b The requirement for development without increasing flood risk elsewhere stipulated in HDPF Policy 38 Strategic Policy Flooding, and NPPF 178 b. in respect of the proposed scheme cannot be satisfied.

12.1 Surface water flooding is sometimes known as flash flooding. It happens when rainwater cannot drain away through normal drainage systems.

13. The total impermeable area of the proposed development, if permitted, would be 1.384ha.

14. The Government’s Long Term Flood Risk Service <https://check-long-term-flood-risk.service.gov.uk/risk#> advises that for the Barns Green Village Stores and Post Office, the Queens Head Public House, and Herons Reach cottage:

- The Yearly chance of Surface Water flooding is **High**, and

- The Yearly chance of Surface Water flooding between 2040 and 2060 is also **High**.

15. The Barns Green Village Store and Post Office, the adjoining Herons Reach cottage and the Queens Head Public House are Grade II Listed buildings. They are located on the east side of Chapel Road opposite and below/downslope of the Site.

16. The applicant’s Flood Risk Assessment and Surface Water Drainage Statement states that

“Although there are no recorded flooding incidents in Barns Green, anecdotal evidence presented at the Parish Council meeting on 08 August 2025 from local residents suggests that flooding to existing properties along Chapel Road, notably the Post Office, after periods of intense or prolonged rainfall is an ongoing concern” (paragraph 5.4.12).

“There is an existing highway drainage network within Chapel Road. During the Parish Council meeting, it was suggested that the main cause of this flooding to existing properties was a lack of ongoing maintenance to the existing highway drainage infrastructure with residents claiming that they had to clear the gully’s and drains themselves. The properties that experience the most regular flooding are the Listed Building and the Post Office”.

“The floor levels of these buildings are below the level of the adjacent highway therefore any failure (or lack of maintenance) of this network could have a significant impact on existing properties” (paragraph 5.6.5).

17. The Flood Risk Assessment and Surface Water Drainage Statement also states that: “Chapel Road is lower than the Site, therefore the risk of flooding due to failing highway infrastructure to the proposed development is ‘Low’ (paragraph 5.6.6).

17.1 However, whilst the risk of surface water flooding of the proposed development may well be ‘Low’, it is nevertheless justifiably of huge concern for Chapel Road residents for whom the risk is High, not least because of the potential for the proposed scheme to make far worse the existing Chapel Road surface water flooding problem.

18. According to the Flood Risk Assessment and Surface Water Drainage Statement:

“This site-specific flood risk assessment demonstrates clearly that the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development without increasing flood risk elsewhere” (7.1.6).

18.1 UK Government ‘Guidance Flood risk assessments: climate change allowances’ (May 2022) states; “You should consider residential development to have a minimum lifetime of 100 years”.

19. The Risk Assessment’s presumption, that the proposed layout, design and mitigation measures would keep safe the development’s residents from current and future surface water flood risk, without increasing flood risk elsewhere, for at least 100 years, is dependent on the efficacy of the future-rainfall predictions that underpin the assessment and the effectiveness of the proposed design and mitigation measures.

20. The effectiveness of the proposed design and mitigation measures over 100 years is not assured – it cannot be guaranteed. Research by the Meteorological Office has found that

“The observed rainfall record in the UK is fairly erratic with a large amount of variability, these latest projections show that this is likely to continue through the century. What we can see from the higher resolution output is an even more erratic frequency of extreme events each year, **so this could mean we see clusters of record breaking intense rainfall events, followed by a period when no records are broken**”

“Another concern is apparent sudden transitions to a much higher frequency of extreme events illustrated by the model output. This would suggest a sudden increase in the numbers of extreme rainfall events, outside of the experience of recent decades. If this scenario did happen it could lead to impacts where infrastructure was unprepared for such a change in our weather” (New research shows increasing frequency of extreme rain. Press Office: 7 March 2023).

21. The applicant’s flood assessment states that “For exceedance runoff greater than the design storm event, levels across the site have been designed to convey runoff across the surface towards the attenuation basin and deculverted watercourse adjacent to Chapel Road (6.5.21).

21.1 In addition to the runoff from the development, including the built area’s impermeable surfaces (1.39 hectares), the deculverted water course will receive surface water from Chapel Road and the field ‘Land South of Muntham Drive’, and beyond.

22. The (applicant’s proposed) deculverted water course would discharge into the Muntham Gill via the existing culvert, which extends approximately 20m south of the Site’s southern boundary.

22.1 Culverting substantially heightens the risk of flooding due to constricted flow within piped sections, susceptible to blockages, and an increase in water transportation to nearby streams and rivers, therefore increasing flood risk and vulnerability, especially during storm surges.

22.2. Constricted flow could result in significant storm overflow from the deculverted water course with resultant surface water flooding to the Grade II Listed Barns Green Village Store and Post Office, Herons Reach Cottage and the Queens Head Public House, and other Chapel Road properties.

23. Chapel Road, where it adjoins the eastern boundary of the Site, is lower than the Site along its entire length.

24. Exceedance runoff greater than the designed-for-storm event could also have negative consequences for residents whose properties adjoin Muntham Gill.

25 a In summary, the effectiveness of the proposed design and mitigation measures in preventing surface water from the Site causing flooding off-site for the lifetime of the development (a minimum of 100 years) is not assured.

25 b The requirement for development without increasing flood risk elsewhere stipulated in HDPF Policy 38 Strategic Policy Flooding, and NPPF 178 b. in respect of the proposed scheme cannot be satisfied.

Affordable Homes – clarification needed, and delivery not assured

26. Are the 17 Affordable-Rent Homes proposed by the applicant for the scheme ‘Social Rent Homes’ or ‘Other Affordable Housing for Rent’ as defined in the NPPF Glossary, or are they a mixture of both categories?

26.1 The applicant’s Planning Statement (incorporating Affordable Housing Statement and draft S106 Heads of Terms) paragraph 9 advises that in compliance with HDPF Policy 16 the proposed scheme would deliver 24 Affordable Homes amounting to 35% of the 68 dwellings proposed for the scheme.

27. The Planning Statement states that the 24 affordable units would comprise 17 Affordable Rent homes and 7 Affordable Shared Rent homes, therefore 70% and 30% respectively as required by HDPF Policy 16.

28. The NPPF Annex 2: Glossary states that

“Affordable housing: housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:

a) Social Rent: meets all of the following conditions: (a) the rent is set in accordance with the Government’s rent policy for Social Rent; (b) the landlord is a registered provider; and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision.

b) Other affordable housing for rent: meets all of the following conditions: (a) the rent is set in accordance with the Government’s rent policy for affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent)”.

(We note the Regulator of Social Housing’s new Rent Standard, which sets out rent policy from 1 April 2026 onwards, published 2 February 2026:

<https://www.gov.uk/government/news/regulator-of-social-housing-publishes-the-rent-standard-2026>)

29. **Clarification is needed:** Are the 17 Affordable-Rent Homes proposed by the applicant ‘Social Rent Homes’ or ‘Other Affordable Housing for Rent’ as defined in the NPPF Glossary, or are they a mixture of both categories?

30. **Whether a Registered Provider can be engaged to deliver and manage the affordable homes (social rent or other affordable housing for rent) proposed by the applicant for DC/25/2057 is not assured.**

31. **DC/21/2697 Land at Sumners Ponds**, Barns Green was permitted by HDC with the understanding that 12 of the 32 proposed homes would be “affordable with tenures split between intermediate and affordable rent” (DC/21/2697 Design and Access Statement paragraph 3.0.1).

And that the tenure split would accord with the HDPF Policy 16 requirement that 70% of affordable units should be delivered as social/affordable rent, whilst 30% should be delivered as shared/ intermediate ownership (Planning and Affordable Housing Statement paragraph 6.3.4).

32. Subsequently however, “Despite extensive marketing” the developer was “unable to gain any interest in the affordable housing units” (e.g. the social/affordable rent homes) from a Registered Provider.

32.0.1 “The only offer received was from a non-registered provider” on condition that the tenure of these homes was “amended to all shared ownership”.

(Application for the Modification or Discharge of Planning Obligations, 2 October 2023).

33. The resultant proposed modification was approved by HDC (Application for the Modification or Discharge of Planning Obligations. Date on which Notice was served 11 Oct 2024 .

34. **Research by the Home Builders’ Federation (HBF)** by means of FOI requests to Local Authorities in England and Wales in June 2025, report published 1 October 2025:

<https://www.hbf.co.uk/news/uncontracted-section-106-affordable-homes-october-2025/> found that:

- Across a sample of 105 Local Authorities, there are 302 completed Section 106 Affordable Homes that currently remain unsold due to the absence of a contract with a Registered Provider.

- There are at least 2,254 Section 106 Affordable Homes across 84 Local Authorities that are either under construction or due to commence construction within the next 12 months that are not currently under contract with a Registered Provider.

35. Accordingly, whether a Registered Provider can be “engaged to deliver and manage the affordable homes (social rent or other affordable housing for rent) proposed by the applicant for DC/25/257 is not assured.

36. Would the scheme enable young first-time buyers to live in the parish, and would it enable older residents to remain in the parish (should they wish to do so)?

37. The made Barns Green and Itchingfield Neighbourhood Plan stipulates:

“It is important, for the sustainability of the parish, that any developments contain a mix of housing for families and individuals of all ages. It is important that older residents should be able to remain in the parish (should they wish to do so) by having accommodation suitable to their needs. Younger first-time buyers ought to be able to live in the parish” (Paragraph 6.9.0).

38 a In compliance with the Neighbourhood Plan would DC/25/2057 enable younger first-time buyers to live in parish?

<https://www.gov.uk/first-homes-scheme/how-the-scheme-works>

38 b. In compliance with the Neighbourhood Plan would DC/25/2057 enable older residents to remain in the parish should they wish to do so?

38.1 Apparently not.

An on-site bird survey is needed for this application

39. The applicant’s Preliminary Ecological Survey states that

“the grassland onsite is actively grazed, which may deter ground nesting birds such as skylark. However, the hedgerow on site provides suitable nesting habitat for breeding birds. As such, the site is considered to have potential to support breeding birds” (paragraph 3.26).

40. The applicant’s Ecological Impact Assessment advises that

“The development will result in a temporary loss of suitable nesting habitat provided by the eastern hedgerow. It is not considered that these habitats are likely to support significant numbers of breeding birds or species of significance” (paragraph 5.18).

41. Whether “these habitats” or indeed the field itself “ are likely to support significant numbers of breeding birds or species of significance”, including those covered by the

NERC Act Section 41, the Wildlife and Countryside Act Schedule 1, and Red and Amber list bird species, can only be determined by on-site bird surveys.

42 a Unfortunately, neither the Preliminary Ecological Survey nor the Ecological Impact Assessment for the proposed scheme is informed by on-site bird surveys.

42 b No on-site bird surveys have been undertaken for the scheme.

43. On-site bird surveys are needed to enable HDC to fulfil its biodiversity duty under the NERC Act, Section 40, and the Government Circular 06/2005 Biodiversity and Geological Conservation Statutory Obligations and their impact within the planning system' (NPPF Foot Note 68 refers).

44. Be advised that the 'eastern hedgerow', which the developer wishes to remove, is a substantial hedgerow, c.115 metres long, in which House Sparrows nest, commute, forage and shelter. They also forage in the adjacent field, as well as in gardens on the opposite side of the road.

45. House Sparrow has declined in the UK since the mid-1970s with losses most notable in the south and east, and is UK Red Listed in consequence.

<https://www.bto.org/learn/about-birds/birdfacts/house-sparrow>

46. Contrary to the applicants Preliminary Ecological Survey, that the field is or was 'actively grazed' pasture would **not** deter birds from foraging and some bird species ground nesting there.

47. Natural England's 'Guidance Wild birds: advice for making planning decisions How to assess a planning application when there are wild birds on or near a proposed development site' should be complied with.

In conclusion, CPRE Sussex asks that this application, which is being imposed on the community, thereby undermining their Neighbourhood Plan, be refused.

Yours faithfully,

Dr R F Smith, DPhil, BA (Hons), PGCE, FRGS

Trustee CPRE Sussex

Copy to: Chair CPRE Sussex