SOUTHWATER RESIDENTS

Planning Objection Reference Guide

Berkeley Homes — 1,000 Homes, Land Northwest of Southwater HDC Planning Ref: DC/26/0366

HOW TO USE THIS GUIDE

- This guide contains 9 main objections to the Berkeley Homes proposal, each broken into separate sub-objections (30 in total) . Every sub-objection is a standalone statement you can copy and paste into the Horsham District Council planning portal.
- You do not need to use all of them. Choose the ones that matter most to you — or use all three sub-objections under an issue you feel strongly about.
- Each sub-objection includes key facts and figures highlighted in orange — drawn from official sources including Horsham District Council's own evidence base, Environment Agency reports, and Southern Water's own regulatory filings.
- Your objection will carry more weight if you add a personal sentence about how the issue affects you — your street, your commute, your family's health, or your view from your home.
- Every single response counts. The more individual voices the Planning Inspector hears, the stronger the case against this development. Please make your voice known – objecting to HDC is the only effective way to object – Facebook comments don't count.

HDC planning portal: planning.horsham.gov.uk — search for Berkeley Homes Southwater outline application by entering DC/26/0366 in the keyword box and press "Search"

Petition: you.38degrees.org.uk/petitions/stop-the-housing-development-on-farmland-near-southwater

Contact: Save Rural Southwater: info@saveruralsouthwater.com

Date: 26th March 2026.

Click on the relevant topic listed below to go to the objection page of interest.

Contents

Objection 1: Berkeley Homes' 1,000-Home Proposal Breaks Southwater's Own Neighbourhood Plan

Sub-Objection 1A: The proposal is more than double what Southwater's Neighbourhood Plan allows

Neighbourhood Plan housing limit: 420–460 homes (approved by referendum, June 2021)
Berkeley Homes proposal: 1,000 homes — 117% more than the Plan allows
Planning rule: Where a proposal conflicts with an up-to-date Neighbourhood Plan, permission should not normally be granted (NPPF Para 14)

► *Copy the text below and paste it into the HDC planning portal. Add a personal sentence if you can.*

I am objecting to the Berkeley Homes proposal to build 1,000 homes on farmland northwest of Southwater.

Southwater residents voted in a democratic referendum in June 2021 to approve a Neighbourhood Plan that set a clear and legally binding limit on new housing in the village — between 420 and 460 homes. That was agreed through a proper community-led process.

Berkeley Homes is now proposing more than double that number — 1,000 homes. This is not a slight overshoot. It is a 117% breach of the limit that residents themselves set.

National planning rules state clearly that where a proposal conflicts with the current and in-date Neighbourhood Plan, planning permission should not normally be granted. The Southwater Neighbourhood Plan is recent, legally adopted, and carries full weight.

Berkeley Homes has provided no independent evidence to justify overriding a community plan that was voted for by local people just five years ago. Housing planners may state that the plan is “out of date” being 5 years old but an online petition against this proposal has already attracted over 3000 signatories so the community sentiment back in 2021 is still current.

I ask that the Berkeley Homes 1,000-home proposal be refused because it directly and fundamentally conflicts with the adopted Southwater Neighbourhood Plan on the number of homes allowed.

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Sub-Objection 1B: The proposal creates a second village centre, which the Neighbourhood Plan prohibits

Neighbourhood Plan policy SNP1.1(a): Southwater must remain a single-centre village with shops and services focused at Lintot Square

Berkeley Homes plan: Includes a substantial new commercial hub, shops, and community facilities on the western side of the village

Conflict: Creates a second centre — directly contradicting the Neighbourhood Plan's core principle

► *Copy the text below and paste it into the HDC planning portal. Add a personal sentence if you can.*

I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater.

The Southwater Neighbourhood Plan contains a specific and clear policy: Southwater must remain a single-centre village, with its shops, services and facilities focused around Lintot Square. This is not a minor preference — it is a core planning principle that residents voted to adopt.

Berkeley Homes' proposal includes a large new cluster of shops, community facilities, a primary school, and other services on the western edge of the village — effectively creating a second village centre. This would split the village in two, diverting activity away from the existing centre and changing the fundamental character of Southwater. The proposal fails to consolidate the existing settlement of Southwater and would effectively create a split two-neighbourhood settlement instead of a coherent community

The proposal also extends development well beyond the village boundaries set in the Neighbourhood Plan. Much of the proposed site is on land that the Plan specifically identifies as outside the permitted development area.

A previous Berkeley Homes application for 1,500 homes on the same site (reference DC/22/1916) was withdrawn in February 2023 after Horsham District Council planning officers concluded it was unacceptable. These fundamental concerns have not been resolved — they have simply been repackaged.

I ask that the Berkeley Homes 1,000-home proposal be refused because it violates Neighbourhood Plan policy SNP1.1(a) by creating a second village centre and extends beyond the village boundaries set in the adopted plan.

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Sub-Objection 1C: Approving this proposal would make neighbourhood planning meaningless

Neighbourhood Plan referendum: Passed June 2021 — the highest form of community consent in planning

Parish Council decision: Voted at Extraordinary Meeting (December 2025) to begin a full review of the Neighbourhood Plan

Risk: Approving 1,000 homes before the review completes would pre-empt and undermine the democratic process

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I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater.

Neighbourhood planning exists to give communities a genuine say over where and how their village grows. Southwater residents invested significant time and effort in creating a plan that was put to a referendum and passed in June 2021. That is the strongest form of community consent available under the planning system. Housing planners may state that the plan is "out of date" being 5 years old but an online petition against this proposal has already attracted over 3000 signatories so the community sentiment back in 2021 is still current.

In December 2025, Southwater Parish Council held an extraordinary meeting and voted to begin a full review of the Neighbourhood Plan — in part because of the pressure being applied by this very proposal. That review is now underway and represents the proper democratic process for deciding Southwater's future.

If Berkeley Homes is permitted to build 1,000 homes before that review is complete, the Neighbourhood Plan's housing limit is rendered completely pointless. It would send a clear message to every community in England that spending years producing a Neighbourhood Plan means nothing if a large developer simply lobbies hard enough.

No material planning evidence has been put forward by Berkeley Homes or Horsham District Council to justify why the community's own plan should be overridden and clearly does not satisfy the social and housing needs of the local community.

I ask that the Berkeley Homes 1,000-home proposal be refused, or at minimum deferred until the Southwater Neighbourhood Plan review is complete, so that the community's democratic voice is properly respected.

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Objection 2: The Land Cannot Drain Properly and the Development Will Make Flooding Worse

Sub-Objection 2A: Weald Clay soil means standard drainage solutions do not work here

Geology: Weald Clay — classified by the Environment Agency as a Non-Aquifer with a very low infiltration coefficient

Effect: Rainwater cannot soak away — standard soakaway drainage systems are completely ineffective on this soil type

Climate rule: All drainage systems must now be engineered to handle 40% more intense rainfall than historic levels (NPPF requirement)

Known problem: Gardens on the nearby Blakes Farm estate have flooded repeatedly due to the same clay soil

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I am objecting to the Berkeley Homes proposal to build 1,000 homes on farmland northwest of Southwater on the grounds that the site cannot be safely drained.

The entire site sits on Weald Clay — a soil type officially classified by the Environment Agency as having almost no ability to absorb water. This is the fundamental hydrological character of this land. It is not a marginal issue that can be engineered away.

On Weald Clay, standard drainage solutions — soakaways, permeable paving, infiltration trenches — simply do not work. Berkeley Homes would have to rely entirely on large above-ground storage ponds, underground tanks, and carefully managed outflows to local streams and ditches. At the scale of 1,000 homes, with thousands of roofs, roads and driveways replacing farmland, this is an enormous engineering challenge.

Planning rules now require drainage systems to cope with a 40% increase in rainfall intensity to account for climate change. The 2025 drought — the worst in 132 years — demonstrates this is not a theoretical risk. Berkeley Homes has not provided an independently verified drainage strategy that proves this is achievable.

Gardens on the Blakes Farm estate nearby have flooded repeatedly over many years — direct evidence of what happens when this clay soil is built over without adequate drainage.

I ask that the Berkeley Homes 1,000-home proposal be refused until an independent, specialist drainage engineer — with specific Weald Clay experience — has verified that flooding risk will not increase for existing residents or downstream watercourses.

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Sub-Objection 2B: The drainage works risk permanently damaging two areas of irreplaceable ancient woodland

Adjacent woodlands: Courtland Wood and Smith's Copse — both designated ancient woodlands

Legal protection: Ancient woodland has near-absolute protection under national planning law — it cannot be replaced once damaged

Risk: Large-scale drainage engineering on clay can alter groundwater levels across a wide area, damaging tree root systems without physically entering the woodland

Missing evidence: No independent hydrological impact assessment of these woodlands has been submitted

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I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater because the drainage works required could permanently damage two areas of ancient woodland.

Courtland Wood and Smith's Copse lie immediately alongside the proposed development site. Both are designated ancient woodlands — habitats that have been continuously wooded for over 400 years and are considered irreplaceable under national planning law. Once damaged, ancient woodland cannot be restored.

The threat is not just from bulldozers entering the woodland directly. Large-scale drainage engineering on Weald Clay can lower or alter groundwater levels across a wide surrounding area. Ancient woodland trees have root systems extending far beyond the woodland boundary, and changes to soil moisture caused by attenuation ponds and drainage channels nearby can kill these trees silently over years, without any direct physical contact.

This is a well-evidenced, recognised risk — yet Berkeley Homes has not submitted any independent hydrological assessment of the impact their drainage works would have on these woodlands. A developer's own consultant assessment is not sufficient for something this serious and irreversible.

I ask that the Berkeley Homes 1,000-home proposal be refused until a fully independent, peer-reviewed hydrological impact assessment on Courtland Wood and Smith's Copse has been completed and published for public scrutiny.'

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Sub-Objection 2C: Flooding from this development would affect existing residents and cannot be undone

Site area: 141 hectares of agricultural land to be replaced with roofs, roads and hardstanding

Impact: Converting farmland to hard surfaces dramatically increases the volume and speed of surface water runoff into local streams and ditches

Current drainage: Existing watercourses in the area already surcharge (overflow) during heavy rain events

Irreversibility: Once built, there is no mechanism to undo the drainage impact on existing homes and gardens

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I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater because the development will increase surface water flooding that already affects existing residents.

The 141-hectare site is currently farmland. Farmland, even on clay, slows the movement of rainwater into local streams and ditches. Once it is replaced with 1,000 homes' worth of roofs, roads, driveways, pavements and car parks, the volume of rainwater running off the site into local watercourses will increase dramatically — and it will arrive faster.

The scale of attenuation required to manage this runoff is substantial. The roofs alone — at 50m² per home across 1,000 properties and a rainfall of 0.75m — would generate enough water to require 7.5 hectares of child-safe attenuation area (defined as no more than 50cm water depth). Once anticipated climate change factors are applied, that figure rises to 10.5 hectares. This is an enormous land take within the development, and there is no evidence that Berkeley Homes has adequately planned for it.

Local streams and drainage channels in this area already overflow during heavy rain. Residents already experience waterlogged gardens and flooded access routes after storms. Adding the runoff from 141 hectares of new hard surfaces — however it is managed by attenuation ponds — creates a real and material risk of making this significantly worse.

Climate change is making extreme rainfall events more frequent and more intense. The drainage system for this development must be designed for the worst case, not average conditions. There is no evidence that Berkeley Homes has done this.

If flooding increases after the development is built, there is no remedy available to affected residents. The damage is permanent.

> **I ask that the Berkeley Homes 1,000-home proposal be refused on the grounds that it poses an unacceptable and unmitigated risk of increasing flood risk to existing Southwater residents and properties.**

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Sub-Objection 2D: Homes built on flood-risk land cannot be insured under the Flood Re scheme — buyers may be unable to get a mortgage, making them unsellable

ABI (Association of British Insurers) position: Every new home 'must not be built in flood-risk areas' — ABI Director General, 2025

Flood Re exclusion: All homes built after 1 January 2009 are explicitly excluded from Flood Re — the UK's safety-net flood insurance scheme. Every Berkeley Homes property on this site would be unprotected

Scale of the problem nationally: Aviva analysis (February 2026): 1 in 9 new homes built in England between 2022 and 2024 were in flood-risk areas — noneligible for Flood Re.

Mortgage risk: Nationwide Building Society has already stopped offering mortgages on some properties at high flood risk. HSBC warns properties 'are likely to become uninsurable' if Flood Re ends in 2039

Bank of England warning: A home that becomes uninsurable loses value — potentially substantially. Banks rely on insured property as collateral; without cover, that collateral rapidly loses value

3 million homes at risk: Researchers at Loughborough University estimate up to 3 million UK homes could become effectively worthless within 30 years if climate adaptation targets are not met

Cost of flood damage: ABI data: average cost of repairing a flood-damaged home is £33,600. In 2024, the ABI paid out a record £585 million in home weather-damage claims

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I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater on the grounds that homes here may be uninsurable and unmortgageable — raising a simple question: what is the point of building homes that buyers cannot get a mortgage on?

The UK has a flood insurance safety-net called Flood Re, backed by the government and the insurance industry. The Association of British Insurers (ABI) has one absolute rule: Flood Re does not cover any home built after 1 January 2009. Every single Berkeley Homes property on this site would be excluded from this protection from day one — permanently. This is deliberate policy, not an oversight. The ABI's Director General said in 2025 that new homes 'must not be built in flood-risk areas.' The Flood Re exclusion of new builds exists specifically to discourage exactly this type of development.

Without Flood Re, a home on flood-risk land faces sky-high insurance premiums or no insurance at all. Without insurance, mortgage lenders will refuse to lend. Nationwide Building Society has already publicly stopped offering mortgages on properties it considers high flood risk. HSBC has warned that properties 'are likely to become uninsurable' when Flood Re closes in 2039. The Bank of England cautions that an uninsurable home loses value substantially — because banks use insured property as collateral, and without cover that collateral is worthless.

The scale of this problem is growing. Aviva's February 2026 analysis found 1 in 9 new English homes built between 2022 and 2024 were in flood-risk areas — all Flood Re-excluded. Loughborough University researchers warn up to 3 million UK homes could become effectively worthless within 30 years. The ABI recorded a record £585 million in home weather-damage payouts in 2024 alone. The average cost of repairing a single flooded home is £33,600.

Berkeley Homes' site sits on Weald Clay with a documented local history of surface water flooding. Building 1,000 homes here — permanently excluded from Flood Re, facing growing flood risk, with no confirmed insurance availability — risks creating a development that buyers cannot insure, cannot mortgage, and cannot sell. That is not housing delivery. It is a financial trap sold to families.

I ask that the Berkeley Homes 1,000-home proposal be refused until Berkeley Homes demonstrates , with independent actuarial evidence , that flood insurance will be available and affordable for all 1,000 homes on this site in perpetuity – given that every property will be permanently excluded from the UK's Flood risk safety net scheme from the day it is built thus resulting in the inability to obtain mortgages to purchase said homes..

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Sub-Objection 2E: Weald Clay causes structural damage through subsidence and heave — making homes harder to insure, harder to sell, and increasingly costly to maintain as the climate worsens

BGS classification: Weald Clay is specifically named by the British Geological Survey as one of the UK's highest shrink-swell risk soils — alongside London Clay and Gault Clay

Costliest UK geohazard: Shrink-swell clay damage costs the UK economy over £400 million every year, according to the BGS — the single most damaging geohazard in Britain

ABI subsidence claims: Over 10,000 households made subsidence claims worth £64 million in just one quarter (July–September 2018) — a 350% jump on the previous year, driven by clay soil drying in the summer heatwave

Annual claims scale: Between 28,000 and 55,000 domestic subsidence claims are made every year in the UK, costing insurers £140–£400 million annually

2025 claims: In the first half of 2025 alone, insurers paid £153 million across around 9,000 households — average payout £17,264 — after an exceptionally warm spring

Ancient woodland risk factor: The site is immediately adjacent to two ancient woodlands. Tree roots actively dry out clay soils, dramatically increasing shrink-swell movement under nearby foundations

Climate trajectory: The BGS GeoClimateUKCP18 model projects significantly increased clay shrinkage risk across Sussex by 2030–2035, driven by more frequent droughts

Insurance consequence: A property with a history of subsidence claims faces dramatically higher premiums, reduced mortgage availability, and reduced resale value

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I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater on the grounds that Weald Clay — the geology of the entire proposed site — creates serious structural risks to buildings through a process called shrink-swell subsidence and heave, compounding the already severe insurance and mortgage problems described above.

The British Geological Survey (BGS) specifically names Weald Clay as one of the highest shrink-swell risk soils in Britain — alongside London Clay and Gault Clay. Shrink-swell is the process by which clay contracts and cracks in dry weather, then swells when wet. For buildings, this means foundations are repeatedly lifted, shifted, and cracked — damaging walls, floors, and drainage. The BGS identifies this as the single costliest geohazard in Britain, at over £400 million in damage every year.

The insurance consequences are already severe and growing. In summer 2018, the ABI recorded over 10,000 subsidence claims worth £64 million in a single quarter — a 350% increase driven entirely by shrinkable clay drying out. In the first half of 2025 alone, insurers paid £153 million across around 9,000 households following a warm spring, averaging £17,264 per claim. Nationally, between 28,000 and 55,000 domestic subsidence claims are made annually, costing insurers up to £400 million a year. South-east England — including West Sussex — is the highest-risk region.

At this specific site the risk is compounded by the immediate proximity of Courtland Wood and Smith's Copse. Tree roots extract moisture from clay soils well beyond the woodland boundary, intensifying the shrinkage that damages foundations. Buildings close to large established trees on shrinkable clay face materially higher structural risk. Ancient woodland trees cannot simply be pruned to reduce this — root systems extend far beyond the canopy, and severe pruning risks killing trees that are legally irreplaceable.

Climate change is making this significantly worse. The BGS GeoClimateUKCP18 model forecasts substantially increased clay shrinkage risk across Sussex in 2025–2035 as droughts become more frequent. A home built here today faces a structural environment projected to deteriorate throughout its lifetime. A property with subsidence claims history faces higher premiums, tighter

mortgage terms, and lower resale value — and insurers and lenders are becoming increasingly unwilling to take on this risk at all.

I ask that the Berkeley Homes 1,000-home proposal be refused until an independent structural and geotechnical assessment specifically addressing the shrink -swell risk of Weald Clay at this location. -including the influence of adjacent ancient woodland tree roots and projected climate impacts to 2070 – has been published and independently peer reviewed.

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Objection 3: Local Infrastructure Cannot Support 1,000 More Homes — No Joined-Up Assessment Has Been Done

Sub-Objection 3A: Over 2,100 new homes are already committed — no cumulative impact assessment has been done

Broadacres development: ~350 homes — already under construction
Horsham Golf Club site: ~800 homes — planning permission already granted
Berkeley Homes (proposed): 1,000 homes
Cumulative total: ~2,150 new homes — none assessed together
Previous application: Berkeley Homes' 1,500-home application (DC/22/1916) withdrawn Feb 2023 partly due to cumulative infrastructure concerns — which have since got worse, not better

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I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater because no proper assessment has been made of the combined impact of all the growth Southwater is already absorbing.

Southwater is not starting from zero. Approximately 350 homes are already under construction at Broadacres. Around 800 more have planning permission at the Horsham Golf Club site. That is already around 1,150 new homes committed before Berkeley Homes has built a single house.

Adding 1,000 more brings the total to over 2,150 new homes — more than doubling the number of households in a village whose roads, schools, doctors' surgeries and sewage system were not built to cope with growth at this scale.

No one has carried out an assessment of what all this growth means for Southwater's infrastructure together. Berkeley Homes has assessed only its own proposal in isolation — ignoring the 1,150 homes already in the pipeline. That approach is not good enough.

The timescale of this development compounds the problem further. At Berkeley Homes' known build-out rate of 50–60 homes per year, and with a further estimated 200 units yet to be built elsewhere, construction on this site would extend over 20 years. A planning authority is only legally obliged to demonstrate a five-year housing land supply — yet approving this application would effectively hand a single developer a 20-year land supply in this location. Locking up this land for two decades since one developer's build-out capacity is not a sound or proportionate use of the planning system.

When Berkeley Homes applied for 1,500 homes on this same site in 2022, Horsham planning officers concluded the cumulative infrastructure impact was one of the key reasons the application was unacceptable. That application was withdrawn in February 2023. The infrastructure position has got worse since then, not better — yet Berkeley Homes is now asking for 1,000 homes with no better evidence.

> **I ask that the Berkeley Homes 1,000-home proposal be refused until a full, independent cumulative infrastructure assessment covering all committed and proposed Southwater development has been completed and published.**

► *Copy the text ABOVE and paste it into the HDC planning portal. Add a personal sentence if you can.*

Sub-Objection 3B: GP and NHS capacity is already overstretched — no plan exists to expand it

Current position: Southwater GP surgeries are already at or beyond capacity — patients face significant waits for appointments

Ambulance response: Southwater has some of the poorest ambulance response times in Sussex due to its distance from hospitals

NHS confirmation: NHS England has not confirmed that primary care capacity can be delivered for 2,150+ additional homes

Infrastructure plan: No funded, legally secured plan for GP expansion or new health facilities has been provided

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I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater on the grounds that NHS and healthcare infrastructure is already overwhelmed, and no plan exists to expand it.

Anyone who lives in Southwater knows how hard it is to get a GP appointment. The surgeries serving the village are already under serious pressure from the population that is already here — let alone the 1,150 new homes already approved and under construction. The situation is not simply one of physical capacity: the local surgery appears to have room to accommodate additional GPs but is currently unable to recruit them. Approving 1,000 more homes does nothing to solve a staffing crisis that the NHS itself has not been able to resolve. Access to NHS dentistry in the area is also severely constrained, with many residents unable to register with any NHS dentist at all.

Southwater is also geographically isolated from the main hospitals. As a result, ambulance response times for our area are among the worst in the whole of Sussex. Adding over 2,000 more homes will put even greater pressure on emergency response capacity.

NHS England has not confirmed that primary healthcare capacity exists or can be funded to serve the additional population from Berkeley Homes' proposal. There is no costed, legally secured plan for a new GP surgery or expansion of existing facilities. 'We will work with the NHS to address this' is not a plan — it is a hope.

Previous large Southwater developments came with promises of community infrastructure that did not materialise on time, or at all. Residents have already been let down once. Approving 1,000 more homes based on promises is not acceptable.

> **I ask that the Berkeley Homes 1,000-home proposal be refused until NHS England has formally confirmed that funded, deliverable primary healthcare provision exists to serve the combined population increase from all committed Southwater developments.**

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Sub-Objection 3C: Sewage infrastructure is already failing, and Southern Water has no comprehensive and legally committed expansion plan to address the issue.

Current failures: Southwater residents have experienced sewage overflows and inadequate sewage provision for years, unresolved

Southern Water record: Fined £90 million in 2020 after pleading guilty to 51 offences of deliberate sewage dumping

Bill increases: Ofwat requires Southern Water to raise bills by up to 44% by 2030 — Southern Water is appealing this

Uncertainty: Southern Water's appeal against investment requirements creates serious doubt over whether promised upgrades will be delivered

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I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater on the grounds that the sewage and wastewater system is already failing residents and Southern Water cannot be trusted to fix it.

Some Southwater Parish Council residents have been dealing with sewage overflow problems for years — problems that Southern Water has repeatedly failed to resolve. Adding 1,000 more homes to an already strained network, without a confirmed and funded upgrade, is irresponsible.

A serious new concern has emerged. Planning application DC/26/0366 reveals that foul sewage from the proposed development will be treated at Barns Green Wastewater Treatment Works. Southern Water's own documents (Flood Risk Assessment and Outline Drainage Strategy, 27/02/2026, para. 11.1.3; Annex H) confirm that while it intends to increase capacity at Barns Green, this will take at least 24 months — and potentially longer. Approving development now would place the Barns Green works under severe additional load before any upgrade is in place, with a real and predictable risk of sewage discharging into local watercourses.

Southern Water's track record offers no reassurance. In 2020 it pleaded guilty to 51 criminal offences of deliberately dumping untreated sewage, was fined £90 million, and was described by the Environment Agency as the worst case in its history. The company's financial conduct since then deepens the concern further. Ofwat has determined that Southern Water must invest sufficiently to require customer bills to rise by 44% by 2030 — a ruling Southern Water is actively appealing. That appeal speaks for itself: this is a private equity-run enterprise resisting the investment its regulator has deemed necessary, and there is no credible basis for assuming it will voluntarily fund the future-proofed infrastructure capacity that 1,000 new homes would require.

Planning permission must not be granted on the assumption that a company actively resisting investment will deliver the infrastructure needed. Southern Water must provide a formal, legally binding commitment to expand sewage treatment capacity before any development is permitted. The applicant's own drainage strategy — acknowledging a minimum 24-month upgrade timeline — makes this requirement unambiguous.

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I ask that the Berkeley Homes 1,000-home proposal be refused until Southern Water has provided a formally confirmed, independently verified, and legally secured commitment to upgrade sewage and wastewater treatment capacity for Southwater without unduly impacting neighbouring villages.

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Sub-Objection 3D: Water scarcity is an unresolved infrastructure constraint — removing a planning rule did not fix the physical problem

Water neutrality lifted: 31 October 2025 — but this removed a legal planning condition, not the underlying physical water shortage

Sussex North Water Supply Zone: Already identified as a water-stressed area — cumulative growth risks Southern Water's ability to maintain abstraction at Hardham

2025 drought: Hottest summer since records began in 1884; preceding spring the driest in 132 years — hosepipe bans imposed across the region

National deficit: England faces a projected shortfall of nearly 5 billion litres of water per day by 2050 — Sussex is among the worst-affected areas

Broadacres evidence: Residents on the recently built Berkeley Homes Broadacres estate in Southwater have already removed water-saving restrictors because inadequate water volume reached their homes

Forecast gap: HDC's own water demand calculations are misaligned with Southern Water's published consumption figures by 21%

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I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater on the grounds that water scarcity is a real, unresolved infrastructure constraint — and the removal of the formal water neutrality planning condition has not changed the physical facts on the ground.

In October 2025, Horsham District Council announced that the 'water neutrality' requirement — which had paused large housing developments in this area for several years — had been lifted. This has been used to suggest the water supply problem is solved. It is not. Removing a planning rule does not create more water. It simply removes the formal mechanism that required the problem to be addressed before building proceeded.

The Sussex North Water Supply Zone, which serves Southwater, is a designated water-stressed area. Southern Water has itself confirmed that cumulative housing growth in this zone creates risks to its ability to sustainably manage groundwater abstraction at Hardham. The physical constraint has not gone away — it has been administratively set aside.

The 2025 drought was the worst in over 130 years. Hosepipe bans were imposed. The Environment Agency confirmed England needed a full winter of above-average rainfall to recover — which did not materialise. England already faces a projected water deficit of nearly 5 billion litres per day by 2050, with Sussex among the worst-affected regions.

We also have direct local evidence that the water supply for Southwater is already under strain. Residents on the recently built Berkeley Homes Broadacres estate — a development on the same side of the village — have had to remove water-saving flow restrictors from their taps and showers because they were not getting enough water pressure or volume for basic daily needs. This is happening now, before 1,000 more homes are added.

In addition, Horsham District Council's own water demand monitoring is misaligned with Southern Water's published consumption figures by 21%. This means the official planning calculations used to argue that water supply is adequate are themselves unreliable.

I ask that the Berkeley Homes 1,000-home proposal be refused until an independent hydrogeological assessment — not a Southern Water self-assessment — has confirmed that potable water supply in the Sussex North Water Supply Zone is sufficient and sustainable for 1,000 additional Southwater homes across all weather conditions, including drought years.

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Objection 4: The Roads Cannot Handle the Traffic and There Is No Realistic Alternative to the Car

Sub-Objection 4A: The A24 and local road network are already at capacity — adding 1,000 homes makes it unworkable

A24 status: Already at or beyond capacity at peak times — confirmed in HDC's own evidence base
Hop Oast roundabout: Already recorded at capacity by HDC — without any Berkeley Homes homes being built
Combined pressure: 800 homes at Golf Club site (already approved) + 1,000 Berkeley Homes = 1,800 new homes all feeding the same junction
Previous objection: West Sussex County Council Highways raised unresolved objections on traffic grounds to Berkeley Homes' previous 1,500-home application

► *Copy the text below and paste it into the HDC planning portal. Add a personal sentence if you can.*

I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater because the local road network is already at breaking point and this development will make it far worse.

The A24, which is the only realistic route in and out of Southwater for most journeys, is already at or beyond capacity at peak times. This is not residents' opinion — it is confirmed in Horsham District Council's own evidence base.

The Hop Oast roundabout, which would be one of the main access points for the Berkeley Homes development, is already at capacity according to the Council's own figures — and this is before a single Berkeley Homes home is built. Adding 1,000 new homes, alongside the 800 already approved at the Horsham Golf Club site, would bring 1,800 new car-dependent households through this single junction.

Adding 1000 homes will increase car dependency and increase the number of cars on local roads by approximately 1500 in the village which will add to the traffic attracted to the village for school drop off and pickup from villages outside Southwater. The problem will not simply be an increase of traffic due to houses but also due to the new school being promoted as part of the proposal.

When Berkeley Homes previously applied for 1,500 homes on the same site, West Sussex County Council Highways raised serious unresolved objections on traffic grounds. The application was withdrawn. Those concerns were never resolved — and the traffic position has got worse since then.

Adding traffic signals or road markings to an already-overloaded junction does not solve the problem. It delays it and makes it slightly more orderly. The underlying capacity is still exhausted and would create traffic bottlenecks within the village and on the A24 resulting in gridlock for new and existing residents.

I ask that the Berkeley Homes 1,000-home proposal be refused on the grounds that the A24 corridor and local road network cannot accommodate the traffic it would generate, and no viable mitigation has been demonstrated.

► *Copy the text ABOVE and paste it into the HDC planning portal. Add a personal sentence if you can.*

Sub-Objection 4B: Southwater is a car-dependent location — every new resident will need a car for every journey

Railway station: None in Southwater — Christ's Hospital station is remote, infrequent, and has no meaningful parking

Bus service: Infrequent and does not serve new residential estates

A24 barrier: The A24 dual carriageway and railway physically cut Southwater off from Horsham town centre and jobs — no safe crossing exists for pedestrians or cyclists

Employment: Very limited employment in Southwater — the majority of working residents commute out by car

► *Copy the text below and paste it into the HDC planning portal. Add a personal sentence if you can.*

I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater because this is one of the worst possible locations for large-scale housing in terms of car dependency.

Southwater has no railway station. Christ's Hospital station — the nearest — is remote from the village, served by infrequent trains and has no meaningful car parking. The bus service is sparse and does not serve newer housing estates. There is no viable cycling or walking route across the A24 dual carriageway or the railway line that separates Southwater from Horsham town centre and the district's main employment areas.

The result is that every new Southwater resident will need a car for virtually every significant journey. This is not a lifestyle choice — it is a geographical fact. HDC's own Local Cycling and Walking Infrastructure Plan (2020) confirms that the A24 and railway are hard physical barriers that cannot realistically be crossed on foot or by bike.

Southwater has very limited employment of its own. People who move here for work will commute by car, adding daily vehicle movements to roads that are already at capacity. This is the opposite of the sustainable development that planning rules require.

The question of where new residents will look for services and schools deserve scrutiny. Berkeley Homes' supporting documents suggest a school linkage with the Horsham Golf Club development, but this connection has not been made sufficiently clear by the applicant. It is also unclear whether the Golf Club development is looking to Southwater more broadly for other services and infrastructure — or whether, in practice, residents of both developments will look to Horsham for schools, healthcare and employment rather than to Southwater at all. If the latter is the case, it further undermines the case for locating large-scale development here: new residents will not be served by Southwater's limited facilities, they will simply add to the traffic burden on routes into Horsham.

Berkeley Homes' proposal includes aspirational commitments to bus services and cycle routes — but these are not funded, not contracted, and not enforceable. Aspirations are not infrastructure.

I ask that the Berkeley Homes 1,000-home proposal be refused on the grounds that the site is inherently car-dependent by geography, with no credible prospect of genuinely sustainable travel alternatives being delivered.

► *Copy the text ABOVE and paste it into the HDC planning portal. Add a personal sentence if you can.*

Sub-Objection 4C: The secondary school traffic assessment is fundamentally flawed and creates a child safety risk

Berkeley Homes claim: The proposed secondary school will generate little or no additional traffic — because pupils will walk or cycle

Problem: The A24 dual carriageway lies between the school and the Horsham Golf Club development from which many pupils would come — there is no safe pedestrian or cycle crossing

Safety risk: Children attempting to cross the A24 at an informal point face serious risk of road accident or death

Required solution: A grade-separated pedestrian/cycle crossing (underpass or footbridge) — significant capital cost that Berkeley Homes has not committed to fund

► *Copy the text below and paste it into the HDC planning portal. Add a personal sentence if you can.*

I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater on the grounds that the traffic assessment for the proposed secondary school is seriously wrong and creates a real child safety risk.

Berkeley Homes' transport assessment claims the new secondary school would generate very little additional traffic — arguing that most pupils will walk or cycle. This conclusion is not credible.

A new secondary school south of Horsham would attract pupils from across a wide area, including from the 800 homes already approved at the Horsham Golf Club site. However, the A24 dual carriageway lies between the Golf Club development and the proposed school. The A24 is a high-speed, high-volume trunk road. There is no safe pedestrian or cycle crossing at a suitable point for school-age children.

Without a safe crossing, the assessment's walking and cycling projections for school trips are worthless. Children who try to cross the A24 at an informal or unsignalized point are at serious risk of a road accident. This is not a detail to be sorted out at a later stage — it is a fundamental safety constraint that must be resolved before planning permission is granted.

The only adequate solution is a grade-separated crossing — either an underpass or a footbridge. This is expensive infrastructure that Berkeley Homes has not committed to fund, design or deliver.

I ask that the Berkeley Homes 1,000-home proposal be refused until Berkeley Homes has committed in writing to fund and deliver a fully safe, grade-separated pedestrian and cycle crossing of the A24 as a condition of any permission.

► *Copy the text ABOVE and paste it into the HDC planning portal. Add a personal sentence if you can.*

Objection 5: The Development Will Damage Irreplaceable Ancient Woodland and Destroy Local Wildlife

Sub-Objection 5A: Two areas of irreplaceable ancient woodland are immediately adjacent and at direct risk

Woodland at risk: Courtland Wood and Smith's Copse — both designated ancient woodlands, immediately adjacent to the site

Legal status: Ancient woodland has near-absolute protection in national planning law — it cannot be compensated for or replaced

Planning rule: Development that would damage ancient woodland must be refused unless wholly exceptional circumstances exist (NPPF Para 186c)

Missing evidence: No independent hydrological assessment of the impact on these woodlands has been submitted by Berkeley Homes

► *Copy the text below and paste it into the HDC planning portal. Add a personal sentence if you can.*

I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater because it poses a serious risk to two irreplaceable areas of ancient woodland.

Courtland Wood and Smith's Copse sit immediately alongside the proposed development site. Both are designated ancient woodlands — habitats that have existed continuously for over 400 years. Under national planning law, ancient woodland has near-absolute protection. It cannot be recreated. It cannot be compensated for by planting trees elsewhere. Once damaged, it is gone.

The risk is not limited to direct physical encroachment. The massive drainage engineering that would be required on this Weald Clay site — large attenuation ponds, underground storage tanks, and controlled drainage channels — would change the movement of water through the soil across a wide area around the site. Changes to groundwater levels and soil moisture can damage and kill ancient woodland trees through their root systems without any physical entry into the woodland.

Berkeley Homes has not provided any independent assessment of this specific hydrological risk to Courtland Wood and Smith's Copse. A developer's own consultant report is not sufficient for a risk that is permanent and irreversible.

I ask that the Berkeley Homes 1,000-home proposal be refused until a fully independent, peer-reviewed assessment of the hydrological impact on Courtland Wood and Smith's Copse has been carried out and published.

► *Copy the text ABOVE and paste it into the HDC planning portal. Add a personal sentence if you can.*

Sub-Objection 5B: Wildlife surveys are incomplete — Berkeley Homes is trying to survey after approval, not before

Requirement: Full wildlife surveys must be completed and assessed before planning permission is granted — not after

Known wildlife: Badgers with established, long-standing foraging routes across the proposed development land

Berkeley Homes approach: Surveys to be completed post-allocation — the law does not permit this approach

Law: Badgers and their setts are protected under the Protection of Badgers Act 1992 — disturbance without licence is a criminal offence

► *Copy the text below and paste it into the HDC planning portal. Add a personal sentence if you can.*

I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater on the grounds that the wildlife impact surveys are incomplete, and Berkeley Homes is seeking to carry them out after approval rather than before — which is not permitted.

Planning law is clear: the impact on protected wildlife must be properly assessed before planning permission can be granted. It cannot be deferred to a later stage. This is not a technicality — it is a fundamental safeguard designed to prevent irreversible harm to wildlife being done first and assessed second.

There is established evidence of badgers and other wildlife using foraging routes across this land that have existed for generations. Badgers and their setts are protected under the Protection of Badgers Act 1992 — interfering with them without a licence is a criminal offence. The disruption caused by a 1,000-home development to these routes and habitats has not been adequately assessed.

Berkeley Homes has argued that full surveys should wait until after the allocation is confirmed. This approach is legally improper and should be rejected. It is designed to avoid scrutiny at the stage when it is most meaningful.

The scale of wildlife using this land — including but not limited to badgers — has not been assessed in any rigorous, independent way. This is a significant and unresolved gap in the evidence base.

I ask that the Berkeley Homes 1,000-home proposal be refused until fully independent, comprehensive wildlife surveys covering the entire site have been completed, published, and independently assessed.

► *Copy the text ABOVE and paste it into the HDC planning portal. Add a personal sentence if you can.*

Sub-Objection 5C: The 10% biodiversity gain requirement cannot be met locally — it risks an ecological desert next to homes

Legal requirement: All major developments must achieve a minimum 10% Biodiversity Net Gain (Environment Act 2021)

Challenge: Weald Clay sites have limited scope for on-site habitat creation due to drainage engineering constraints

Risk: Berkeley Homes may rely on purchasing off-site 'biodiversity credits' — meaning local wildlife gains nothing

Question unanswered: Will the 10% gain be delivered near the development where residents can benefit, or purchased remotely?

► *Copy the text below and paste it into the HDC planning portal. Add a personal sentence if you can.*

I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater on the grounds that the legal requirement for a 10% biodiversity gain has not been credibly demonstrated.

Since 2024 all major planning applications must achieve a minimum 10% net gain in biodiversity as a legal condition of planning permission. This is not optional. Berkeley Homes must demonstrate — before permission is granted — that biodiversity will measurably increase because of this development.

On a Weald Clay site, achieving meaningful biodiversity gain on the development site itself is particularly difficult. The ground conditions that cause drainage problems also limit the types of habitats that can be successfully created. Furthermore, the land taken up by attenuation ponds and drainage infrastructure reduces the space available for genuine habitat.

There is a serious risk that Berkeley Homes will seek to meet the 10% requirement by purchasing 'biodiversity credits' relating to habitat improvements somewhere entirely different — potentially far from Southwater. This would mean the local area around the development ends up as an ecological desert, while the paperwork shows a net gain on a distant field.

Southwater residents deserve to know whether the biodiversity gain required by law will be delivered in or near the development, where people living there can see and benefit from it.

I ask that the Berkeley Homes 1,000-home proposal be refused until a credible, independently verified biodiversity net gain strategy is submitted that demonstrates genuine local ecological improvement — not remote offsetting.

► *Copy the text ABOVE and paste it into the HDC planning portal. Add a personal sentence if you can.*

Objection 6: This Development Will Permanently Change the Character and Feel of Southwater

Sub-Objection 6A: At 1,000 homes, this turns a village into a small town — forever

Scale of change: 1,000 new homes would more than double the housing stock on the western side of the village

Site size: 141 hectares of open farmland — the equivalent of about 200 football pitches — built over permanently

Neighbourhood Plan: Requires development to respect the existing landscape character of the village and avoid coalescence with surrounding rural areas

Irreversibility: Once farmland is built on, it cannot be returned to countryside — ever

► *Copy the text below and paste it into the HDC planning portal. Add a personal sentence if you can.*

I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater because at this scale, it does not extend the village — it fundamentally transforms it.

Southwater is a village. That is what it is and what residents chose to live in. The open farmland to the northwest — 141 hectares, the equivalent of roughly 200 football pitches — currently forms a natural transition between the village edge and the open Low Weald countryside. Once it is built over, that countryside is gone permanently.

A development of 1,000 homes is not a modest expansion. Combined with the 800 homes already approved at the Golf Club site and 350 at Broadacres, Southwater would be adding more than 2,000 homes in a single generation. That transforms a large village into a small town — irreversibly. The scale of this proposed development vastly exceeds anything Southwater was designed to absorb. It is not an extension of an existing settlement; it is being dumped on top of one.

The Southwater Neighbourhood Plan, voted for by residents, specifically requires that development avoids coalescence with neighbouring settlements and respects the existing landscape character of the village. This proposal does the opposite.

Berkeley Homes has not demonstrated that it has engaged seriously with any design framework governing how growth should be integrated into Southwater. It is unclear whether the applicant has referenced Horsham District Council's design guidance, any settlement-specific design guide, or the Southwater Neighbourhood Plan's own design principles. HDC should satisfy itself that such a framework exists and that Berkeley Homes has been required to demonstrate compliance with it. Without that, there is a real risk that this development degrades the character and coherence of the settlement rather than adding to it.

No combined landscape assessment has been carried out looking at the Berkeley Homes proposal alongside the Golf Club site and Broadacres development together. The cumulative visual impact on Southwater — and on the risk of coalescence with neighbouring settlements — has never been honestly assessed.

> **I ask that the Berkeley Homes 1,000-home proposal be refused on the grounds that it will cause permanent and unacceptable harm to the landscape character and rural setting of Southwater village.**

► *Copy the text ABOVE and paste it into the HDC planning portal. Add a personal sentence if you can.*

Sub-Objection 6B: The development would begin to merge Southwater with Christ's Hospital — removing the gap between them

Neighbourhood Plan policy: Requires meaningful gaps to be maintained between Southwater and adjacent settlements

Settlement at risk: Christ's Hospital — immediately adjacent to parts of the proposed development site

Planning term: 'Coalescence' — the merging of two distinct settlements into one — is a recognised planning harm

No cumulative assessment: No landscape assessment of the combined effect of all three Southwater developments has been carried out

► *Copy the text below and paste it into the HDC planning portal. Add a personal sentence if you can.*

I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater because it will erode the physical separation between Southwater and Christ's Hospital, which the Neighbourhood Plan specifically requires to be maintained.

Southwater and Christ's Hospital are distinct and separate settlements. The open land between them — much of which falls within or adjacent to the Berkeley Homes development area — currently provides the physical separation that keeps them distinct. Once that land is built over, the gap between the two settlements is gone.

The Southwater Neighbourhood Plan explicitly requires that development maintains meaningful gaps between the village and adjacent settlements, to prevent the merging — or 'coalescence' — of communities. This is a widely recognised planning principle. Berkeley Homes' proposal directly conflicts with it.

Two other large developments are also underway at the edges of Southwater. The Golf Club site development and Broadacres are both expanding the village boundary. No landscape assessment has ever been done of what all three schemes together mean for the spaces between Southwater and its neighbouring settlements.

The cumulative loss of separation has never been honestly addressed in any planning document submitted by Berkeley Homes.

I ask that the Berkeley Homes 1,000-home proposal be refused until a proper cumulative landscape assessment has been carried out demonstrating that meaningful separation between Southwater and Christ's Hospital can be maintained.

► *Copy the text ABOVE and paste it into the HDC planning portal. Add a personal sentence if you can.*

Sub-Objection 6C: Southwater sits on a flat open plateau — 1,000 homes will be visible for miles and will permanently alter the skyline

Topography: Southwater sits on a relatively flat Low Weald plateau with open, long-distance views across the surrounding countryside

Visual impact: Continuous residential development along the village edge will be visible from a wide area, including across protected countryside

Missing assessment: No combined Landscape and Visual Impact Assessment (LVIA) covering the Berkeley, Golf Club, and Broadacres schemes together has been produced

Neighbourhood Plan: Specifically requires that development is sympathetic to the village's landscape setting and open countryside character

► *Copy the text below and paste it into the HDC planning portal. Add a personal sentence if you can.*

I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater because the visual impact on the surrounding landscape has not been honestly or properly assessed.

Southwater sits on a gently elevated, open plateau. Unlike settlements protected by valleys or woodland, the quality of Southwater's setting is defined by its wide, open views across the Low Weald countryside. This is one of the things that makes living here distinctive — the sense of being in a village in open countryside rather than in continuous suburban sprawl.

Building 1,000 homes along the western edge of the village will fundamentally alter what is visible from the surrounding countryside. A continuous line of rooftops, streets and buildings extending across the current farmland will be visible for considerable distances — changing the character of the landscape irreversibly.

There is an added cumulative dimension. The Golf Club site to the north and Broadacres to the east are both adding hundreds of homes to Southwater's edges at the same time. No Landscape and Visual Impact Assessment has been done that looks at all three developments together and honestly assesses what Southwater will look like from the surrounding countryside when they are all complete.

This is not a subjective preference. Protecting landscape character is a specific requirement of national planning law and the Southwater Neighbourhood Plan.

I ask that the Berkeley Homes 1,000-home proposal be refused until a full cumulative Landscape and Visual Impact Assessment covering all three concurrent Southwater developments has been independently conducted.

► *Copy the text ABOVE and paste it into the HDC planning portal. Add a personal sentence if you can.*

Objection 7: The 'Affordable' Homes Will Not Be Affordable to Local People and Local Need Has Not Been Proven

Sub-Objection 7A: 'Affordable' at 80% of market value is not affordable on local wages

Local median house price: Approximately £430,000
Local median earnings: Approximately £36,000 per year
'Affordable' definition: Up to 80% of market value — meaning £344,000 for an 'affordable' home here
Mortgage needed: Based on 4x salary, a local worker on median wages can borrow approximately £144,000 — less than half an 'affordable' home
HDC policy requirement: 40% of homes must be affordable (70% affordable rent / 30% shared ownership)

► *Copy the text below and paste it into the HDC planning portal. Add a personal sentence if you can.*

I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater on the grounds that the homes described as 'affordable' are not affordable to the people who live and work in Southwater.

In the planning system, 'affordable housing' means homes priced at up to 80% of the open market value. In Southwater, where the median house price is approximately £430,000, that means an 'affordable' home would cost around £344,000. Berkeley Homes does not appear to be proposing any social rented housing at all — only affordable homes to buy. Yet 80% of market value is unaffordable to most people on local wages, making the distinction between 'affordable to buy' and 'market price' largely meaningless in practice.

The median wage for people in this area is approximately £36,000 per year. A person on that salary can borrow approximately £144,000 on a standard mortgage. That is less than half the price of an 'affordable' home.

This is not affordable. Calling it affordable does not make it affordable. The gap between local wages and local house prices is so wide that the standard definition of 'affordable housing' is essentially meaningless in this part of West Sussex.

Horsham District Council's policy requires 40% of homes in major developments to be genuinely affordable — 70% as affordable rent and 30% as shared ownership. Berkeley Homes must demonstrate, with independent evidence, that it will deliver this in a form that local people can genuinely access. Crucially, Berkeley Homes has not demonstrated that any registered provider has committed to taking on the affordable housing element of this development. Without that commitment, the affordable housing offer is unverified and cannot be relied upon.

Where housing is intended to accommodate residents displaced from other municipalities, it is essential that those homes are in places with good access to employment, schools, services and public transport. Southwater currently lacks all of these at the scale this development would demand. Placing displaced residents in a location where they cannot access work, education or services without a car does not constitute a housing solution — it creates a dormitory settlement. That would represent a serious failure of planning policy and an unacceptable outcome for the people placed there.

> **I ask that the Berkeley Homes 1,000-home proposal be refused until Berkeley Homes demonstrates, with independently verified evidence, that the affordable homes proposed will be genuinely accessible to people on local average wages in Southwater.**

► *Copy the text ABOVE and paste it into the HDC planning portal. Add a personal sentence if you can.*

Sub-Objection 7B: Berkeley Homes can use a 'viability assessment' to reduce the affordable homes it builds — with no independent check

HDC requirement: 40% affordable homes on all major developments

Developer loophole: Developers can submit a 'viability assessment' claiming they cannot afford to deliver 40% — and negotiate it down

Problem: These assessments are typically prepared by the developer's own consultants, with figures the developer controls

Risk: Previous large developments in the area delivered significantly fewer affordable homes than originally promised

Berkeley Homes history: Has previously marketed Southwater properties to overseas investors — raising questions about whether local need is the priority

► *Copy the text below and paste it into the HDC planning portal. Add a personal sentence if you can.*

I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater because the mechanism for delivering affordable homes can be legally used to reduce the number built, with no meaningful independent oversight.

Horsham District Council's policy requires 40% affordable homes on major developments. But developers are allowed to submit a 'viability assessment' — a financial model claiming the development is not profitable enough to deliver 40% — and negotiate the obligation down.

These viability assessments are almost always prepared by consultants appointed and paid by the developer. The figures they contain — including land costs, construction costs and profit margins — are controlled by the developer. This creates a system in which the developer effectively marks its own homework on what it can afford to provide.

The result is that the number of affordable homes delivered by large developments is frequently far lower than the headline figure promised at the planning application stage. This pattern has been seen repeatedly across the country.

It is also notable that Berkeley Homes has previously marketed properties in Southwater to overseas investors. This raises a legitimate question about whether meeting local housing need is genuinely the purpose of this scheme, or whether it is primarily a commercial proposition for an investor market.

I ask that the Berkeley Homes 1,000-home proposal be refused until the affordable housing commitment has been independently verified by a surveyor appointed by the Council, not by Berkeley Homes, and the number of genuinely affordable homes is legally fixed as a condition of any permission.

► *Copy the text ABOVE and paste it into the HDC planning portal. Add a personal sentence if you can.*

Sub-Objection 7C: No genuine local housing need for 1,000 homes in Southwater has been demonstrated

Key question: Has it been proven that there is a genuine need for 1,000 homes specifically in Southwater? No.

Demand drivers: Housing pressure in this area largely originates from Gatwick, Crawley, and coastal overspill — not from Southwater itself

Employment mismatch: Southwater has very limited local employment — HDC's own economic strategy identifies North Horsham and the Gatwick Diamond as the growth corridor, not Southwater

Planning rule: Development must address genuine, locally identified housing need — not simply meet a numerical target

► *Copy the text below and paste it into the HDC planning portal. Add a personal sentence if you can.*

I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater on the grounds that no genuine, independently demonstrated local housing need for 1,000 homes in this specific village has been established.

Planning rules require that housing development addresses real, locally identified need — not simply that it adds to a district-wide number. The question is not 'does Horsham District need housing?' — of course it does. The question is: 'is there genuine evidence that Southwater specifically needs 1,000 more homes, over and above the 1,150 already committed?'

The honest answer is no. Much of the housing pressure in this part of West Sussex originates from Gatwick Airport's workforce, Crawley reaching its boundaries, and coastal towns to the south. These are pressures generated elsewhere and should be addressed near where they arise — not transferred to a village with limited employment of its own.

Horsham's own economic strategy identifies North Horsham and the Gatwick Diamond as the primary employment and growth corridors — not Southwater. Building 1,000 homes in Southwater does not put people near jobs — it creates a commuter dormitory served by a congested A-road.

Berkeley Homes owns this land. That is why it is promoting this site. Land ownership is not the same as planning justification.

I ask that the Berkeley Homes 1,000-home proposal be refused until Horsham District Council and Berkeley Homes have published transparent, independently reviewed evidence that genuine local housing need for 1,000 homes in Southwater — not in Horsham District generally — has been established.

► *Copy the text ABOVE and paste it into the HDC planning portal. Add a personal sentence if you can.*

Objection 8: There Is Not Enough Water and the Sewage System Is Already Failing

Sub-Objection 8A: The 2025 drought proves the water supply cannot support 1,000 more homes

2025 drought: Declared the hottest summer since records began in 1884; the preceding spring was the driest in 132 years

Environment Agency: Confirmed in October 2025 that England required at least 100% of average winter rainfall to recover — which did not materialise

Hosepipe bans: Temporary Use Bans imposed across the region including by Southern Water in 2025

National shortfall: England faces a projected deficit of nearly 5 billion litres of water per day by 2050 — Sussex is among the worst-affected areas

Economic cost: Water scarcity estimated to cost the UK £25 billion over the next five years due to stalled housing and business development

► *Copy the text below and paste it into the HDC planning portal. Add a personal sentence if you can.*

I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater on the grounds that the water supply infrastructure for this area cannot reliably support this level of additional demand.

The summer of 2025 was the hottest since weather records began in 1884. The preceding spring was the driest in 132 years. Hosepipe bans were imposed across the region. The Environment Agency confirmed in October 2025 that England needed at least 100% of average winter rainfall just to recover from drought — and that rainfall did not materialise at the required levels.

Sussex is among the parts of England where water stress is already most acute. The Environment Agency projects a national water deficit of nearly 5 billion litres per day by 2050. This is not a future forecast that planners can choose to ignore — it is a present reality that is getting worse year by year.

The basis on which Horsham District Council is monitoring water demand capacity is itself fundamentally flawed, and this materially undermines any assurance that supply infrastructure can accommodate this development. HDC's Planning Policy Team Leader has confirmed that the Council uses an assumed consumption figure of 110 litres per person per day (lpppd) — described as being in line with Building Regulations for a water-stressed area. That figure is not a current consumption measure. It is an aspirational target set by the Environment Agency for achievement by 2050. Using it as a monitoring baseline is a methodological error, not a pragmatic approximation.

Southern Water's own published data for April 2025 to March 2026 records actual average consumption as follows: 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 — a discrepancy of approximately 60 litres per household per day, representing an underestimate of around 21%. A sample survey of actual consumption at the nearby Broadacres new-build development — properties fitted with water-efficient fittings — recorded average consumption of approximately 200 lpppd, nearly double the Council's monitoring assumption.

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 failure as a formal maladministration complaint. The Council is therefore on notice that its monitoring methodology is not only technically wrong but is the subject of an active formal complaint — and yet it continues to use that methodology as the basis for approving major new development. The

practical consequence is that HDC risks approving a volume of development that will exceed Southern Water's actual supply capacity, resulting in water shortages for existing and future residents alike.

Berkeley Homes' own application contains no credible water supply strategy. There is no assessment of cumulative demand from the 1,150 homes already committed in Southwater alongside the 1,000 proposed. There is no independently verified analysis of whether Southern Water's network — already under stress in dry years — has the headroom to serve this additional population. There is no contingency for the worsening drought conditions that the Environment Agency has already identified as a structural trend. The application simply assumes that water will be available. That assumption is not evidence, and in a formally designated water-stressed area it is not an acceptable basis for granting planning permission.

Southern Water imposed hosepipe bans in 2025. It cannot currently guarantee supply reliability to its existing customers in dry years. Adding 1,000 new homes — on top of the 1,150 already committed in Southwater — without a confirmed, independently verified supply strategy is not acceptable. Removing the formal water neutrality planning condition in October 2025 removed a legal mechanism — it did not solve the physical water supply problem. The drought is real. The shortage is real.

> **I ask that the Berkeley Homes 1,000-home proposal be refused until Southern Water has provided a formal, independently verified confirmation that water supply can reliably serve 1,000 additional homes in Southwater — including during drought years.**

► *Copy the text ABOVE and paste it into the HDC planning portal. Add a personal sentence if you can.*

Sub-Objection 8B: Southern Water's own track record means its assurances cannot be relied upon

Criminal conviction: Southern Water pleaded guilty in 2020 to 51 offences of deliberately discharging untreated sewage — the worst case in Environment Agency history

Fine: Fined £90 million — but has continued to discharge sewage unlawfully since

Investment dispute: Ofwat ordered Southern Water to raise bills by up to 44% by 2030 to fund infrastructure — Southern Water is appealing this in February 2025

Leakage: Nearly 19% of all water supplied in England is lost to leakage before reaching customers — most companies, including those in Sussex, are missing their targets

Water usage gap: HDC's water demand forecasting is misaligned with Southern Water's own published consumption figures by 21%

► *Copy the text below and paste it into the HDC planning portal. Add a personal sentence if you can.*

I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater on the grounds that Southern Water, the company that would provide water and treat sewage for these homes, cannot be trusted to deliver on its commitments.

In 2020, Southern Water pleaded guilty to 51 separate criminal offences of deliberately discharging untreated sewage into coastal and inland waters. The Environment Agency described it as the worst case in its history. The company was fined £90 million.

Since then, Southern Water has continued to discharge sewage unlawfully. Ofwat has ordered it to raise customer bills by up to 44% by 2030 to fund the infrastructure improvements it needs to make — but Southern Water is currently appealing this decision, creating serious uncertainty about whether those investments will happen.

Nearly 19% of all water supplied in England is lost to leakage before it reaches a customer's tap. Building 1,000 more homes into a network where a fifth of supply is already being wasted is not a sustainable or responsible approach to water resource planning.

Horsham District Council's own water demand forecasting has been found to be 21% out of alignment with Southern Water's published consumption figures. This means that even the official planning assumptions about water demand are not reliable.

I ask that the Berkeley Homes 1,000-home proposal be refused until an independent body — not Southern Water itself — has assessed and confirmed the reliability of water supply and sewage treatment capacity for this development.

► *Copy the text ABOVE and paste it into the HDC planning portal. Add a personal sentence if you can.*

Sub-Objection 8C: Water usage forecasts used to justify this development assume levels of conservation that are unrealistic and unproven

Demand-side assumption: Developers' water demand calculations assume significant future reductions in per-household water use

Real-world evidence: Residents on the recently built Berkeley Homes Broadacres estate have removed water-saving devices from their homes because they were not getting enough water with them installed

Part G changes: Proposed new building regulations (Part G) would save only about 20 litres per person per day — far too small to close the supply gap from 1,000 new homes

Aquifer risk: Groundwater abstraction at Hardham is already under pressure — continued over-abstraction risks long-term damage to a designated SSSI (Site of Special Scientific Interest)

► *Copy the text below and paste it into the HDC planning portal. Add a personal sentence if you can.*

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.

► *Copy the text ABOVE and paste it into the HDC planning portal. Add a personal sentence if you can.*

Objection 9: Southwater Has Already Done Its Fair Share — This Development Cannot Be Justified

Sub-Objection 9A: Southwater is already absorbing four times its Neighbourhood Plan housing allocation

Neighbourhood Plan allocation: 420–460 homes — approved by referendum 2021
Broadacres: ~350 homes under construction
Horsham Golf Club site: ~800 homes with planning permission
Current committed total: ~1,150 homes — already 2.6 times the Neighbourhood Plan figure
If Berkeley Homes approved: ~2,150 homes total — 4.7 times the Neighbourhood Plan allocation — a 62.9% increase on what is already committed

► *Copy the text below and paste it into the HDC planning portal. Add a personal sentence if you can.*

I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater because Southwater has already committed to far more housing growth than its own community plan identifies as appropriate.

In 2021, Southwater residents voted to set our housing contribution to Horsham District at approximately 420 to 460 homes. That figure was arrived at carefully, based on what the village's infrastructure could support.

Since that vote, two large developments have been approved that already far exceed this figure. Broadacres (around 350 homes) is under construction. The Horsham Golf Club site (around 800 homes) has planning permission. Together, that is already 1,150 homes — two and a half times the figure residents voted for.

Berkeley Homes now wants to add another 1,000 on top — bringing the total to over 2,150 new homes. That is nearly five times the Neighbourhood Plan figure. That would represent a 62.9% increase on top of what is already in the pipeline.

There is no planning principle that requires a single village to absorb this level of growth. Housing need exists across Horsham District and should be distributed across many locations — not concentrated on a village that has already done more than its fair share.

I ask that the Berkeley Homes 1,000-home proposal be refused on the grounds that Southwater has already substantially exceeded its proportionate and democratically agreed housing contribution. Enough is enough.

► *Copy the text ABOVE and paste it into the HDC planning portal. Add a personal sentence if you can.*

Sub-Objection 9B: This is a developer-driven proposal — not a community-identified need

Planning history: Berkeley Homes applied for 1,500 homes here in 2022 (DC/22/1916) — application withdrawn Feb 2023 after officer opposition

Timeline: Berkeley Homes withdrew in Feb 2023. Horsham District Council published a Draft Local Plan in Dec 2023 allocating the same land for 1,000 homes

Connection: Berkeley Homes' own promotional materials confirm the land was 'identified in the draft Local Plan as suitable' — the plan was written around the developer's site

Proper test: A local plan allocation must be justified by independent evidence — not adopted from a developer's withdrawn application

► *Copy the text below and paste it into the HDC planning portal. Add a personal sentence if you can.*

I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater on the grounds that this is a developer-led scheme with no independent planning justification.

Berkeley Homes applied for 1,500 homes on this same site in 2022 (Horsham reference DC/22/1916). Horsham District Council's own planning officers concluded it was unacceptable on multiple grounds — including infrastructure, ecology, and highways. The application was withdrawn in February 2023.

Remarkably, within ten months of that withdrawal, Horsham District Council published a new Draft Local Plan allocating the same land — for 1,000 homes, under the same developer's stewardship. Berkeley Homes' own promotional materials confirmed the land had been 'identified in the draft Local Plan as suitable for development.'

This is not how the planning system is supposed to work. A Local Plan is meant to be a community document, based on independently assessed evidence of need, identifying the most suitable locations for development. It is not meant to adopt a developer's withdrawn planning application as its strategic housing policy.

The 1,000-home figure in the plan matches Berkeley Homes' commercial proposition precisely. No independent evidence base has been published explaining why 1,000 homes — rather than the 420–460 in the Neighbourhood Plan, or any other figure — is the right number for Southwater.

I ask that the Berkeley Homes 1,000-home proposal be refused on the grounds that it is a developer-led scheme with no credible independent planning justification, and that its inclusion in the Local Plan appears to reflect developer lobbying rather than genuine community need.

► *Copy the text ABOVE and paste it into the HDC planning portal. Add a personal sentence if you can.*

Sub-Objection 9C: Brownfield land elsewhere in the district should be developed first

Novartis brownfield site: Former pharmaceutical factory, North Horsham — 244 affordable homes already approved (planning consent granted October 2025)

December 2024 Brownfield Register: HDC has a published register of brownfield land available for development across the district

Active travel investment: West Sussex County Council is investing in bus and cycling improvements on the A264, A281, and Horsham–Crawley–Gatwick corridor — none of which reaches Southwater

Principle: Building on brownfield land first, before greenfield farmland, is a core planning principle — and is better for the environment

► *Copy the text below and paste it into the HDC planning portal. Add a personal sentence if you can.*

I am objecting to the Berkeley Homes proposal to build 1,000 homes northwest of Southwater on the grounds that brownfield land elsewhere in Horsham District should be developed before more farmland in Southwater is built on.

The principle that brownfield land — previously developed sites — should be built on before greenfield farmland is a core planning principle. It protects the countryside, reduces the infrastructure cost of new development, and puts homes closer to existing services and employment.

The former Novartis pharmaceutical factory site in North Horsham is a ready example. It already has planning permission for 244 affordable homes, granted in October 2025. It is closer to Horsham town centre, rail services, and the district's main employment areas. It requires no new road infrastructure to be genuinely sustainable.

West Sussex County Council is currently investing in bus and cycling improvements along the A264, A281 and Horsham–Crawley–Gatwick corridor. These investments make development along those corridors genuinely sustainable. None of this investment reaches Southwater.

Horsham District Council's own December 2024 Brownfield Register makes the position plain. Across the entire district, HDC has identified just 18 brownfield sites with a combined capacity of approximately 827 dwellings, covering around 20.98 hectares. That total includes sites already under construction, sites with lapsed permissions, and sites that have been in the pipeline for years without progressing. The largest single site — the former Novartis site in North Horsham, with permission for 300 dwellings — remains unbuilt. Several other sites with permissions granted as far back as 2014 have still not been implemented.

Berkeley Homes is seeking permission for 1,000 homes on a single greenfield site. That is more homes than the entire brownfield land supply HDC has been able to identify across the whole district. Before approving the destruction of 141 hectares of open farmland at Southwater, the Council must demonstrate that its brownfield pipeline has been fully explored, actively promoted, and genuinely exhausted. There is no evidence that this has been done. Granting permission for large-scale greenfield release at Southwater while brownfield sites across the district sit unbuilt and unprogressed is not consistent with the brownfield-first principle that lies at the heart of national planning policy.

I ask that the Berkeley Homes 1,000-home proposal be refused, and that Horsham District Council be required to demonstrate that all identified brownfield land on its December 2024 Brownfield Register has been fully considered before any further greenfield development at Southwater is permitted.

► *Copy the text ABOVE and paste it into the HDC planning portal. Add a personal sentence if you can.*

This guide was prepared by Save Rural Southwater on behalf of Southwater residents. Document reference: HDC-LPR-OBJ-2026-SW01. April 2026. All data sourced from publicly available documents including HDC evidence base, Environment Agency reports, Ofwat determinations, and Southern Water regulatory filings.