

From: Planning@horsham.gov.uk <Planning@horsham.gov.uk>
Sent: 16 September 2026 15:37:05 UTC+01:00
To: "Planning" <planning@horsham.gov.uk>
Subject: Comments for Planning Application DC/26/0954
Categories: Comments Received

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 16/09/2026 3:37 PM.

Application Summary

Address:	Land South of Athelstan Way Horsham West Sussex
Proposal:	Residential development for 21no. 1, 2, 3 and 4 bedroom dwellings with associated parking, hard and soft landscaping at Land South of Athelstan Way, Horsham.
Case Officer:	Nicola Pettifer

[Click for further information](#)

Customer Details

Address:	4 Ghyll Crescent Horsham
----------	--------------------------

Comments Details

Commenter Type:	Member of the Public
Stance:	Customer objects to the Planning Application
Reasons for comment:	- Design - Highway Access and Parking - Loss of General Amenity - Overdevelopment - Privacy Light and Noise - Trees and Landscaping
Comments:	FORMAL OBJECTION I wish to object to planning application DC/26/0954 for the proposed development of 21 dwellings on land south of Athelstan Way, Horsham.

I have reviewed the application documentation, including the supporting statements, ecological material, landscape assessment, drainage information, hydraulic modelling, consultation responses and the Council's recent evidence relating to the wider site.

My objection is based on the particular characteristics and constraints of this site. I do not object to the principle of providing housing. My concern is whether this particular site can accommodate the proposed development without unacceptable harm to the countryside setting of Horsham, the landscape, the Chesworth Farm Local Wildlife Site, drainage and flood-risk conditions, the public bridleway and the wider pattern of development.

In my view, the submitted evidence does not adequately demonstrate that it can.

I therefore ask the Council to refuse planning permission.

If the Council is not minded to refuse the application, I request that determination is deferred until the matters identified below have been properly investigated and resolved.

1. The site is a sensitive countryside edge, not simply an urban infill site

The application site is approximately 0.94 hectares and lies south of Athelstan Way, adjoining existing residential development to the north but forming part of the wider open landscape of Chesworth Farm and Muggeridge Field.

The site is outside the existing settlement boundary and forms part of the countryside setting of Horsham.

The fact that housing exists immediately to the north does not in itself make the site part of the built-up area. The Council must consider the function and character of the land and its relationship with the wider countryside.

This is particularly important because the Council's own recent evidence has identified this wider area as environmentally sensitive.

The June 2026 Site Assessment Report Update identifies the wider site as SA060 - Land South of Athelstan Way. The Council's assessment identifies, amongst other matters:

- its countryside location;
- its relationship with Chesworth Farm;
- its recreational and amenity value;
- its Local Wildlife Site designation;
- high landscape sensitivity;
- visual sensitivity arising from the site's topography;
- Public Rights of Way;
- protected trees;
- access constraints; and
- the potential loss of informal recreational space.

The Council's assessment concludes that SA060 is not recommended for allocation for housing.

That evidence cannot simply be ignored because the present application proposes only part of the wider area and 21 dwellings rather than a larger development.

The officer's report should explain explicitly how the present proposal overcomes the constraints identified in the Council's own June 2026 assessment.

2. The Council's own SA060 assessment is highly relevant
The SA060 assessment is particularly important because it is recent and concerns the same wider land.

The Council's current Local Plan examination library confirms that the June 2026 Site Assessment Report Update forms part of the evidence base for the ongoing examination of the Horsham District Local Plan 2023-2040.

The Council's emerging Local Plan is not yet the adopted development plan, and I do not suggest that SA060 automatically determines this planning application.

However, it is highly relevant evidence concerning the suitability and environmental sensitivity of this particular location.

The Council should therefore address the following question:

If the Council's own June 2026 assessment considers the wider SA060 site unsuitable for allocation because of landscape, ecological, recreational, access and other constraints, what has materially changed such that development of part of that same site is now considered acceptable?

That question should be answered explicitly in the officer's report.

3. The proposal would permanently urbanise an important countryside edge

The existing land contributes to the transition between the built-up area of Horsham and the open landscape to the south.

The proposed development would introduce:

- 21 dwellings;
- estate roads;
- parking;
- private gardens;
- domestic boundaries;
- lighting;
- refuse facilities;
- vehicle movements;
- associated infrastructure; and
- continuing residential activity.

The resulting change would therefore be substantially greater than the visual effect of the buildings alone.

It would permanently alter the character of the field and the relationship between the existing settlement and the open countryside.

Landscaping can soften this effect but cannot reproduce the existing undeveloped character.

The Council should therefore assess the development as a permanent urbanisation of a countryside edge, rather than simply as the addition of 21 houses next to existing housing.

4. The applicant's own landscape assessment acknowledges material adverse effects

The applicant's Landscape and Visual Impact Assessment does not conclude that the development has no adverse landscape or visual effects.

It identifies, amongst other matters:
a moderate adverse effect on the contribution of the triangular field to rural character; and
a moderate adverse visual effect for users of part of Public Bridleway 1670/1.

The applicant's conclusion is that these effects are sufficiently localised that they do not amount to unacceptable landscape harm.

That conclusion is a matter for the Council to determine.

The important point is that the applicant's own evidence establishes that the development would cause identifiable adverse landscape and visual effects.

The Council should therefore consider:

- the existing openness of the site;
- its contribution to the rural setting of Horsham;
- views from the public bridleway;
- views across Chesworth Farm;
- the effect of built development on the settlement edge;
- the cumulative effect of roads, gardens, fencing and lighting; and
- the relationship between the proposed development and the remaining open land.

The effects should not be minimised simply because they are described as localised.

5. The earlier planning history demonstrates the long-established sensitivity of this location

There is important planning history concerning the wider Athelstan Way/Muggeridge Field area.

A previous proposal, DC/11/0224, involved outline development for up to 70 dwellings and associated open space.

The earlier planning process considered the environmental and landscape sensitivity of the area in detail.

Contemporary Council evidence recorded that Athelstan Way had previously been considered as a potential strategic housing site but was removed from the emerging plan following the Inspector's consideration of environmental issues. The evidence described the land as an integral part of the wider rural area south of Horsham and contributing to the pleasant setting of the town.

The earlier application and subsequent appeal cannot determine the present application because planning policy and circumstances have changed.

Nevertheless, the history demonstrates that the environmental sensitivity of this location is not a new concern created by local objections to DC/26/0954.

The Council should therefore explain what material change has occurred since the earlier consideration which makes the present development acceptable.

6. The site is within Chesworth Farm Local Wildlife Site

The applicant's ecological material confirms that the site lies within Local Wildlife Site H71 - Chesworth Farm.

This is a significant planning consideration.

The applicant seeks to distinguish the application land from other parts of the Local Wildlife Site by describing the existing grassland

as relatively species-poor.

However, the ecological importance of the site cannot properly be considered solely by examining the botanical quality of the grassland in isolation.

The site forms part of a wider ecological landscape.

The Council should consider:

connectivity between habitats;

movement of bats and other species;

hedgerows and scrub;

mature trees;

boundary vegetation;

the relationship with the wider Chesworth Farm Local Wildlife Site; and

the effect of increased residential activity on the ecological function of the area.

7. The removal of the northern scrub requires proper consideration

The ecological appraisal records the removal of a linear mixed scrub feature along the northern boundary and approximately 50 stumps.

The ecological report indicates that this feature may previously have provided a commuting route for bats.

I am not making any allegation about the circumstances or legality of the removal.

The issue is the reliability of the ecological baseline.

The Council should establish:

when the scrub was removed;

what its previous extent and composition were;

whether it formed part of the ecological connectivity of the site;

whether it provided nesting or commuting habitat;

whether historic aerial photography can establish its former condition; and

whether the biodiversity assessment properly reflects the site's condition before the feature was removed.

This is particularly important because the statutory biodiversity calculation depends upon an accurate baseline.

8. Biodiversity Net Gain does not remove the need to assess ecological harm

The applicant's biodiversity calculations indicate a proposed biodiversity gain.

That does not, in itself, demonstrate that there would be no unacceptable ecological effects.

Biodiversity Net Gain is not a substitute for considering:

designated sites;

protected species;

ecological connectivity;

habitat loss;

disturbance;

lighting;

fragmentation; and

the wider ecological function of the site.

The Council should independently verify the biodiversity baseline

and the assumptions used in the metric.

Particular attention should be given to the relationship between the reported removal of the northern scrub and the biodiversity calculations.

The Council should also establish whether the proposed ecological buffer and dark corridor will remain genuinely functional after occupation of 21 dwellings.

A corridor shown on a plan is not necessarily an effective ecological corridor once it is surrounded by residential development.

9. The bat evidence deserves particular attention

The ecological appraisal records nine bat species, including Nathusius' pipistrelle and barbastelle.

The site therefore has a demonstrable relationship with bat activity.

The applicant proposes measures including retention of existing vegetation, planting, buffering and lighting controls.

The Council should ensure that these measures are sufficiently detailed and enforceable to maintain the ecological function of the site.

In particular, the proposed dark corridor should be assessed against:

actual lighting from the new houses;

street lighting;

vehicle headlights;

garden lighting;

security lighting;

boundary treatment;

future maintenance; and

the likelihood of residents installing additional lighting.

The ecological mitigation should not depend upon assumptions about future resident behaviour which cannot be enforced.

10. Surface-water drainage is a major unresolved issue

The drainage evidence deserves particular scrutiny.

The submitted drainage material states that infiltration testing was undertaken and that the BRE365 test failed because of very low permeability.

Infiltration is therefore not relied upon as the principal means of disposing of surface water.

The proposed system instead depends upon attenuation, a restricted discharge and the receiving drainage system.

This makes the hydraulic performance of the engineered system particularly important.

The drainage strategy is intended to accommodate the 1-in-100-year storm event plus 45% climate-change allowance.

However, the submitted hydraulic model contains a result that requires clarification.

For the 100-year plus 45% climate-change event, the model records at the detention basin:

a water depth of approximately 0.823 m;

approximately 141.2 m³ of node volume;

the status "FLOOD RISK".

The attenuation elements are also shown as "SURCHARGED". I recognise that the model records zero flood volume and that the "FLOOD RISK" label may relate to the intended operation of the detention basin rather than flooding outside the designed drainage system.

I therefore do not claim that the modelling proves that neighbouring properties will flood.

The concern is more precise:

The applicant's own hydraulic model identifies a "FLOOD RISK" condition during the design extreme event, yet the application does not adequately explain the significance of that condition or demonstrate the consequences if the system is exceeded or partially fails.

The Council should require the applicant to explain:

What exactly causes the model to report "FLOOD RISK"?

What is the maximum permitted water level in the basin?

What is the available freeboard?

Does the modelled 0.823 m depth remain entirely within the designed basin?

What is the formal exceedance route?

Where would water travel if the basin were exceeded?

What happens if the outlet is partially or completely blocked?

What happens if the attenuation system is surcharged?

What is the capacity of the receiving ditch?

What is the capacity of downstream culverts?

Could exceedance water affect the bridleway?

Could it affect adjoining land or existing properties?

How will the system be inspected and maintained for the lifetime of the development?

Until these matters are satisfactorily demonstrated, the Council cannot reasonably assume that the proposed drainage system will perform safely under extreme conditions.

11. The drainage system depends upon engineered infrastructure because infiltration is not viable

The failure of the BRE365 infiltration test is important.

The site cannot simply dispose of surface water naturally through infiltration.

The development therefore depends upon:

attenuation;

controlled discharge;

the proposed detention basin;

the outlet structure;

the existing ditch; and

continued maintenance.

Any failure or deterioration of those components could alter the drainage regime.

The Council should therefore consider whether the submitted information is sufficient to establish the long-term reliability of the drainage strategy.

12. The absence of a full intrusive ground investigation is relevant

The drainage report states that no intrusive full ground investigation has been undertaken.

Given the failed infiltration testing and reliance on engineered drainage, this should be examined carefully.

The Council should establish whether the available information is sufficient to confirm:

ground conditions beneath the proposed drainage infrastructure;
seasonal groundwater conditions;

basin stability;

the reliability of assumed ground parameters;

the relationship between groundwater and surface water;

the long-term performance of the proposed attenuation system;

and

the interaction between the proposed drainage and the existing ditch.

The issue is not whether every planning application requires the same level of investigation.

The issue is whether, on this particular site, the evidence is sufficient to demonstrate that the proposed drainage system will operate safely.

13. Relationship between drainage and the Public Bridleway

Public Bridleway HOR-1670 lies immediately adjacent to the site.

The Public Rights of Way consultation response does not amount to an unconditional statement that every aspect of the proposal is satisfactory.

It identifies matters requiring attention, including:

drainage;

changes in ground levels;

maintaining the full width of the bridleway;

construction activity;

vehicle crossings; and

potential interaction between vehicles and users of the bridleway.

The relationship between the drainage proposal and the bridleway is particularly important.

The Council should ensure that the drainage scheme cannot cause water to be discharged onto or across the bridleway and that changes in ground levels do not alter existing surface-water behaviour.

14. Access and the possibility of piecemeal development

The proposed access should be examined not merely in terms of whether it can serve 21 houses but also in relation to the remaining Muggeridge Field.

The access runs close to the retained open land.

The Council should establish whether the proposed arrangement is genuinely designed as a self-contained access for this development or whether its alignment, width or associated infrastructure could facilitate future development of the remaining land.

I am not asking the Council to determine a hypothetical future application.

The point is that the current development should not inadvertently establish infrastructure which changes the development potential or character of the wider field.

The Council should therefore seek clear information regarding:

the purpose of the access alignment;
its width;
its termination;
service corridors;
easements;
whether it could physically be extended;
whether extension would require substantial alteration; and
how the applicant proposes to prevent the current scheme becoming the first phase of a larger piecemeal development.
This is especially relevant in the context of the Council's SA060 evidence.

15. Highway considerations

The proposed development would generate additional vehicle movements onto the existing residential road network.
The Council should consider not simply the calculated number of trips but the practical consequences of those movements at the site access and along Athelstan Way.

Relevant considerations include:

visibility;
pedestrian safety;
parking;
road width;
emergency access;
refuse collection;
construction traffic;
delivery vehicles;
interaction with the bridleway; and
cumulative traffic associated with development in this part of Horsham.

The Council's own wider site assessment has previously identified access constraints in this location.

The current 21-dwelling proposal is smaller than the previous 70-dwelling scheme, but that does not remove the need to demonstrate that the proposed access is appropriate for the particular site.

16. Residential development would alter the recreational character of the area

Chesworth Farm is used by local residents for informal recreation.

The proposed development would increase:

pedestrian activity;
vehicle movements;
dog walking;
domestic lighting;
noise;
garden activity; and
human presence.

Even where individual effects may appear modest, the cumulative effect would alter the character of the countryside edge.

This should be considered alongside the Council's identification of the wider area as having amenity and recreational value.

17. Affordable housing information remains unresolved

The latest Housing consultation response identifies further

information required concerning the affordable housing provision. The Council should not grant permission on the assumption that the headline percentage alone resolves the issue.

The precise:

number;

tenure;

dwelling sizes;

location; and

distribution

of affordable units should be established.

Any affordable-housing requirement should be properly secured through the appropriate planning mechanism.

18. Emerging Local Plan evidence should be given appropriate weight

The Horsham District Local Plan 2023-2040 is still under examination and is not yet the adopted development plan. The Council confirms that the examination has recommenced and that additional site-assessment work was undertaken in 2026.

I do not suggest that the emerging plan should automatically determine the application.

However, the evidence underpinning it is directly relevant.

In particular, the June 2026 SA060 assessment provides recent evidence concerning the precise area in which this application is located.

The Council should therefore explain in the officer report how the current application relates to the findings of that assessment.

19. The cumulative effect is more important than any individual issue

I recognise that some of the individual matters identified above may be capable of mitigation.

The planning question, however, is not whether each issue can be addressed in isolation.

The Council should consider the cumulative effect of:

development outside the settlement boundary;

loss of openness;

landscape and visual harm;

development within the Chesworth Farm Local Wildlife Site;

ecological fragmentation;

the removal of the northern scrub feature;

bat activity;

reliance upon engineered drainage;

failed infiltration testing;

the unresolved hydraulic "FLOOD RISK" result;

proximity to the public bridleway;

access constraints;

increased residential activity;

the relationship with the remaining Muggeridge Field; and

the previous planning history of the site.

Taken together, these considerations demonstrate that this is not an unconstrained housing site.

20. The housing benefit must be balanced against the site-specific harm

I recognise that the proposal would provide 21 additional dwellings, including affordable housing.

That is a material consideration.

However, the provision of housing does not remove the requirement for development to be appropriately located and designed and for environmental and infrastructure impacts to be acceptable.

The Council should therefore undertake a proper planning balance between the benefits of the 21 dwellings and the identified harms.

In particular, the Council should not treat the provision of 21 dwellings as sufficient justification for overriding the site-specific landscape, ecological and drainage constraints without first demonstrating that those constraints have been satisfactorily addressed.

21. Matters which should be resolved before determination

If the Council is minded to approve the application, I request that the following matters are resolved before a decision is made:

Drainage

Explanation of the "FLOOD RISK" result in the 1:100 year +45% climate-change hydraulic model.

Confirmation of the maximum basin water level and available freeboard.

A clear exceedance-flow route.

Assessment of partial and complete outlet blockage.

Confirmation of receiving ditch and downstream culvert capacity.

Demonstration that the bridleway and neighbouring land will not be adversely affected.

Confirmation of long-term maintenance responsibility.

Further ground investigation where necessary to establish the reliability of the drainage assumptions.

Ecology

Verification of the biodiversity baseline.

Explanation of how the removal of the northern scrub feature has been treated in the biodiversity assessment.

Assessment of the site's role within Chesworth Farm Local Wildlife Site.

Confirmation that the proposed ecological buffer and dark corridor will remain functional after occupation.

Appropriate long-term management and monitoring arrangements.

Landscape

Full consideration of the moderate adverse landscape and visual effects identified by the applicant's own LVIA.

Assessment of the cumulative urbanisation of the countryside edge.

Explicit consideration of the Council's SA060 assessment.

Access and development pattern

Confirmation that the proposed access is genuinely designed for the 21-dwelling development.

Clarification of whether the access could facilitate extension into the remaining Muggeridge Field.

Full consideration of highway safety and the interaction with the bridleway.

Housing

Resolution of the outstanding affordable-housing requirements identified by the Housing consultation response.

CONCLUSION

The application should not be treated as a routine 21-dwelling scheme simply because of its relatively modest scale.

The site occupies a sensitive position on the southern edge of Horsham, outside the settlement boundary and within the wider Chesworth Farm landscape.

It lies within the Chesworth Farm Local Wildlife Site and the Council's own June 2026 site assessment identifies the wider SA060 site as having significant landscape, ecological, recreational and access constraints and does not recommend it for housing allocation.

The applicant's own evidence acknowledges adverse landscape and visual effects and records the site's ecological importance, including significant bat activity.

The drainage evidence raises a separate and important concern. Infiltration testing failed because of very low permeability, meaning that the development depends upon engineered attenuation and controlled discharge. The applicant's own hydraulic model records a "FLOOD RISK" condition at the detention basin during the 1-in-100-year plus 45% climate-change event. Although the model records zero flood volume, the significance of that condition and the consequences of system exceedance have not been adequately demonstrated.

The Council should not assume that the engineered drainage system is satisfactory simply because the model produces a nominally compliant discharge rate. The performance of the entire system under extreme conditions, including failure and exceedance scenarios, needs to be demonstrated.

There is also a significant question as to whether the ecological baseline adequately reflects the removal of the northern linear scrub feature and whether the proposed biodiversity and ecological mitigation will maintain the site's function within the wider Chesworth Farm landscape.

The previous planning history reinforces rather than creates these concerns. The environmental sensitivity of this part of Horsham has been recognised in Council and planning evidence over many years.

The proposal would therefore result in a permanent change from open countryside to residential development at a sensitive settlement edge, with consequential landscape, ecological, recreational, drainage and infrastructure effects.

For these reasons, and having regard to the Council's own recent evidence concerning SA060, I respectfully request that planning application DC/26/0954 be refused.

If the Council is not minded to refuse the application, I request that determination is deferred until the drainage, ecological, landscape, access and affordable-housing matters identified

above have been satisfactorily resolved and fully addressed in the officer's report.

Kind regards

Telephone:

Email: planning@horsham.gov.uk



Horsham District Council, Alberty House, Springfield Road, Horsham, West Sussex RH12 2GB
Telephone: 01403 215100 (calls may be recorded) www.horsham.gov.uk Chief Executive: Jane Eaton