



Planning Received

2 JUN 2026

Name:

Ref:

DC/26/0530

Chair: [REDACTED]

[REDACTED]
Church View,
40 Rookwood Park
Horsham
RH12 1UB
fnchorsham@sky.com

Planning Department,
Horsham District Council,
Horsham

28 May 2026

Dear Sirs,

Re; Development at Hornbrook Farm DC/26/0530

Forest Neighbourhood Council (FNC) is grateful to Jaynic for meeting with and attending a couple of FNC's meetings. However, in FNC's opinion the submitted outline planning application does not address the conditions specified in the Strategic Policy HA10 and HOR1 that is in the Horsham District Local Plan Regulation 19 2023-2040 dated 2024, or the objections FNC have raised during the meetings with Jaynic. Accordingly, FNC objects to the application on the following grounds;

The development will be detrimental to the Hornbrook Stream.

The Horn Brook Stream runs along the northern and western boundaries of the site and its slope indicates it is of some importance to the Wealden Ghyll. The ghyll system is part of the St. Leonards Forest SSSI overall protection. The special features are the Bryophytes (mosses and liverworts) of the ghyll banks. As the Horn Brook is also one of the Forest's ghylls, even at its edge, it should also reflect the same significance and therefore have similar protection and importance. In view of the significance of the Horn Brook, FNC ask that steps are taken to consider giving the Horn Brook SSSI status.

The development will be detrimental to the historic hedges.

FNC note that the habitat survey was carried out in April. Probably not visible then, but FNC understands that there is Dogs Mercury on the north eastern side of the site near Doomsday Bridge. This is an indication that there was ancient woodland here.

Also, on the development site are English Bluebells which are protected in the UK under the Wildlife and Countryside Act 1981, making it illegal to intentionally pick, uproot, or destroy wild bluebells. As these bluebells are scattered over the whole site, then any development would destroy them.

There is an ancient hedge line along the southern side boundary as indicated by the presence of indicator species including dog mercury, English Bluebell, black bryony and wood anemone. The last part of this hedge, running to the east of the proposed vehicular access at the South East corner, may be as old as 800 years. This is an approximate age but is similar to the hedges on Chesworth Farm

It is essential that the historic hedges are preserved and protected. As the application does not indicate how the historic hedges will be managed and maintained, FNC objects on the grounds that there has been insufficient evidence gathered to protect the hedges.

It is also essential that the wildlife corridors are maintained.

There are no detailed drainage or sewage details to comment on, so FNC objects on grounds of likely pollution.

The applicant has not provided any plans for foul drainage, sewerage and their connections, although there is a brief mention of sumps.

One of FNC's biggest concerns is the quantity of surface water that will be discharged to the Horn Brook as a result of new impervious surfaces that come with development.

With the predicted increase in climate change induced rainfall and increasing regularity of flooding there is concern that the Horn Brook will be overloaded, leading to localise flooding. Subsequent flooding downstream to the River Arun and beyond has not been considered in sufficient detail. There is also considerable concern about the condition of the water at present in the River Arun from pollution.

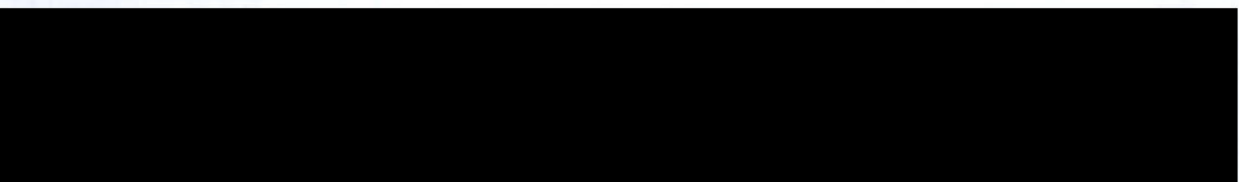
Run-off from this site and subsequent flooding can only increase the current "poor" quality of the Arun's water according to Southern Water's own criteria. Run-off from the new development and road network will include pollutants such as oil, petrol etc. will increase this risk significantly. Neither aspect has been fully addressed in the outline application.

At the present time there is no mains water connection or surface water drainage provision on Hornbook Farm. The adjacent properties have their own private drainage system.

The run off from 180 or even 100 properties will cause immeasurable pollution and damage to local water quality with a detrimental effect upon the Horn Brook.

Policy HB4 (h) of the Neighbourhood Plan states that developers must ".... demonstrate the use of a wide range of creative SUDs solutionsetc. to enhance wildlife and biodiversity....." This has not been provided or demonstrated in detail. FNC cannot support approval of the application until a detailed sustainable drainage plan is proposed.

Concerns about protected species.



It is further understood that River lamprey have been seen in this section of the Horn Brook Stream. River lamprey are legally protected in the UK under strict conservation laws.

The development will damage ancient Trees

The large oak tree on the eastern side of the site is older than 250 years old.

The mature oak's canopy measurements are

- Canopy measured north - south = 22.7 metres.
- Canopy measured east - west = 21.4 metres.
- Girth (circumference) measured 1.5 metres above ground level = 4.4 metres

Although the applicant has indicated some protection for this tree and the other mature trees on the site the limit of the root protection zone must be extended to ensure protection as recommended by BS 5837: 2012 - *Trees in relation to design, demolition and construction: Recommendations*. The applicant indicates other trees on the sites may not be viable when the development is implemented. This is not acceptable as they also should be protected in accordance with BS 5837.

Site outside existing settlement boundary of Horsham Town.

In both Inspector Barnes report 1981 and Inspector Nobles report 1991, they stated that "the extension of the built-up area of Horsham to the east up to the High Weald Area of Outstanding Beauty, would be undesirable and should be resisted." This was supported by the Inspector following from the 1996 local plan inquiry saying "that development would extend the built-up area beyond the present well defined boundary into an attractive rural area.....Housing here would be unrelated to the pattern of existing development and would materially harm the character and appearance of the area...."

The Inspector rejected the planning applications stating the importance of maintaining this green field area. There has been no material change since, hence FNC sees no reason why these findings should be challenged now.

Detrimental to the visual amenities of the site

Major development on this prominent site will have significant visual impacts which will be detrimental to the rural setting of Horsham. It will also have an unacceptable impact on the setting of the High Weald Area of Outstanding Natural Beauty whose boundary is Domesday Lane. Although the developer has indicated that bungalows will be built to the east of the site these will still be visible.

Inadequate infrastructure.

Horsham has a shortage of GP and Dentist's practices, evidenced by long waits for appointments, with many practices having closed their books to new patients through lack of future capacity. An additional 180 houses, with the assumption of 3 people per household, adds 540 patients demand to an already locally overburdened NHS. There is not enough infrastructure to cope with this increased demand.

Character of development

FNC do not consider that the application sufficiently addresses Policy HB3(B)(i) of the Neighbourhood Plan 2019-2036.

Hazardous Pedestrian Access will drive car dependency

Brighton Road Footway

The footway described in the development's Travel Plan on the south side of the A281 Brighton road does not meet the recommended minimum footway width of 1500mm for long stretches of path (approx. 800m) between the Hornbook Inn and the Kerves Lane junction, and also does not have any street lighting (**references – 1) Gov.UK Inclusive Mobility - A Guide to the best practices Access to Pedestrians and transport Infrastructure Dec 2021, 2) Active Travel England Standing Advice Note: Active travel and sustainable development and 3) Horsham DC Local Plan document - Policy 40: Sustainable transport).**

This means that the Brighton Road footway lacks the width for mobility scooters or pushchair users to walk safely on this section, or to pass other slower, or approaching pedestrians.

The Brighton Road footway section has no street lighting. Beyond the obvious risks of walking alone along a dark road, there is an increased risk to pedestrians being dazzled by vehicle **headlights** in the early morning, evenings and night which increases the risk of trips, that could result in a fall into the carriageway due to restricted width of the footway.

The A281 Brighton Road along this section has a speed limit of 40mph (The Transport Assessment survey data submitted by the developers shows that this is exceeded by 34% of the vehicles). The carriageway is itself narrow, causing large vehicles, to pass close to the kerb, in effect much closer than the Highway Code's Rule 212 recommendation that pedestrians walking in the road be given at least the same clearance as when overtaking another vehicle. Should a person stray into the carriageway and be hit by a vehicle travelling at the posted 40mph limit, it is highly likely that they will be killed or seriously injured.

The developers have designated Brighton Road as the defacto route for children and young people to walk to the primary and secondary schools. Given the narrow footway width, and the high speed of vehicles passing close to the kerb edge, Brighton Road will not be a safe route for parents walking with primary age children, many of whom will use scooters. There are numerous side roads to be crossed including that at the Hilliers retail complex, access road and either Kerves Lane **or the main Brighton Road** to be able access the St Leonards Road route to Heron Way School which is a 1.6km and 2km taking a minimum of 20 mins.

The Transport assessment submitted by the developers includes a Stage 1 Road Safety Audit, and in their report at section 3.1.1 it states *"There are schools to the north of the site, within Horsham, and it is unclear whether there are safe walking routes to / from the schools. It is likely that schoolchildren will have to cross Brighton Road twice to get to/from these schools. Unmet desire routes, unexpected pedestrian crossing movements and high vehicle speeds may lead to pedestrian to vehicle collisions."*

The Transport Plan submitted by the developer does not address this issue.

For mobility scooter or other limited mobility users, due to the road inclines and high number of access roads that need to be crossed, using this route will be difficult and creates additional safety issues.

Shortcutting via the dangerous route of Doomsday Lane/ Hammerpond Road is very likely. Local travel planners eg West Sussex Cycle Journey Planner, Google etc, directs pedestrians via Doomsday Lane/Hammerpond Road for access to Heron Way Primary school or Forest and Millais secondary schools. This is a route that is temptingly much shorter, but without safe pedestrian access as it is narrow, busy at peak times, overly shaded, and pedestrians cannot take refuge on the verge. We are concerned that serious injury will result if Doomsday Lane, and its junction with Hammerpond Road is allowed to lie unimproved.

Inadequate and dangerous cycle routes

The Travel plan does not include any specific measures to promote safe cycling either within the housing development or accessing cycle routes to local schools, colleges, rail station, or Horsham Town centre.

The Travel Plan promotes the use of the West Sussex Cycle Journey planner. However, this planner directs cyclists along the unsafe Doomsday Lane/Hammerpond Road route to reach the local schools as both the fastest and quietest route.

The alternative route turning right out of the development onto the A281/Brighton Road, and then right again onto and along St Leonards Road is equally challenging even for experienced and confident cyclists.

The proposed pedestrian crossing is likely to be used by cyclists exiting from the development, so would recommend the development access path to this crossing is designed for both pedestrian and cycle traffic and have a Toucan crossing (designed for both cycle and pedestrian users) rather than a Puffin crossing which is primarily for pedestrians.

Insufficient Public Transport

Public transport to/from Horsham town is available but limited to 1 bus each hour each way, with no direct access to local schools. For younger residents, public transport will be an expensive and a time-consuming option. Hourly buses do not provide the reliable or frequent transport options desired by commuters.

The proposed relocated Bus Stops will result in dangerous obscured visibility for vehicles/cyclist exiting the new development and the Hilliers Garden Centre/Retail area onto Brighton Road when Buses are stopped to drop off/pick up passengers.

Unsafe Travel Plan.

The submitted Travel Plan by the developer does not provide a safe, convenient or sustainable mode of pedestrian or cycle travel.

Public transport is unlikely to be suitable for regular commuters due to the limited frequency and poor connection to the rail network.

This will lead to the development residents opting to primarily use car transport, which is contrary to the HDC Local Plan Policy 40 for sustainable transport.

Residents with nursery or school age children will mostly opt to use car transport which will increase traffic along the already congested roads leading to and along these schools.

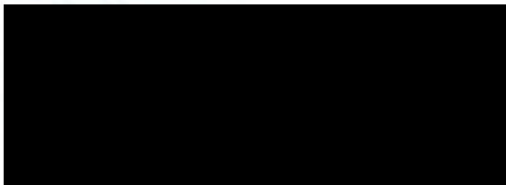
Concluding remarks. FNC is aware that this application is only for outline planning permission, with more detail to be provided at application for full planning. However as some of the conditions needs agreeing now, FNC would like the following conditions to be included in the approval "if" planning permission is granted;-

- Although this is a site allocated for development in the draft HDP, FNC consider that the number of proposed houses is an overdevelopment of site. If the Horn Brook sections of the site is to be protected, which is essential, the number of houses needs to be reduced to a maximum of 100 dwellings and not a minimum.
- We would like to see a condition placed that only bungalows are permitted on the elevated section on the eastern side of the site bordering the National Landscapes (formerly High Weald AONB)
- The developer must be conditioned to comply with policy HB2 of the Neighbourhood Plan, thus encouraged to work with a Housing Cooperative to meet the area's housing needs.
- Any trees that are damaged need to be replaced with trees of equal standing.
- The sewage pipes have enough capacity to serve these additional houses.
- The minimum number of dwellings for affordable housing should be 35% otherwise the planning approval should be rescinded.
- The developer of the site will support an application to reduce the speed on Brighton Road from the junction with Doomsday Lane to 30 mph.
- The "cycle path" onto Doomsday Lane should be closed and locked denying access to Doomsday Lane. If left open it will encourage pedestrians to use this entrance and walk along the dangerous Doomsday Lane, so feeding a fatality waiting to happen.
- A pedestrian bridge crossing to the north of the site would resolve many of our traffic concerns, and also provide connectivity to residents on both sides as specified in the regulation 19 local plan Policy HA10/HOR1 para e). For example, at the "what3word location obey.tuck.spent " located on Hammerpond Road , a bridge linking the planned development "river side pedestrian walk to this location could interlink with Footways, Bridleway and cycle routes to the schools, Horsham Town centre, as well as the footway to Horsham Rugby Club.
- There should be fencing to protect children from accessing the Horn Brook, for their safety and also to protect sensitive wild life species.
- That there is a maintenance programme agreed renewed annually for the swales and SUDS.to manage the water levels.

- That the proposed pedestrian crossing over the Brighton Road, must be installed before any properties are occupied.
- The proposed relocation site of the bus stop is dangerous; FNC would like the words "a proper and safe alternative bus stop location must be installed before any properties are occupied.

Finally, as a consultee on this planning application, a representative from FNC would like to speak at the Planning Meeting when this application is considered. If this is acceptable please contact both the clerk and the chairman by email.

Yours faithfully,

A large black rectangular box redacting the signature of the chair.

(Chair)