

From: Planning@horsham.gov.uk
Sent: 25 May 2026 17:10
To: Planning
Subject: Comments for Planning Application DC/26/0530
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 25/05/2026 5:10 PM.

Application Summary

Address:	Land at Hornbrook Farm Brighton Road West Sussex
Proposal:	Outline planning application for up to 180 dwellings, open space and associated works and infrastructure with all matters reserved apart from access.
Case Officer:	Nicola Pettifer

[Click for further information](#)

Customer Details

Address:	4 Ghyll Crescent Horsham
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Comments Details

Commenter Type:	Neighbour
Stance:	Customer objects to the Planning Application
Reasons for comment:	- Design - Highway Access and Parking - Loss of General Amenity - Other - Overdevelopment - Privacy Light and Noise - Trees and Landscaping
Comments:	Cumulative Ecology Objection - Hornbrook Farm (DC/26/0530) This representation concerns the cumulative ecological implications arising from the Ecological Impact Assessment (EcIA), Ecological Walkover Survey, protected species material and associated ecological submissions supporting the proposed Hornbrook Farm development. Having reviewed the submitted ecology documentation collectively, significant concern remains regarding the extent to which the ecological acceptability of the development appears dependent upon future surveys, future mitigation, future management plans and long-term behavioural controls rather than

the inherent environmental suitability of the site itself.

The submitted reports repeatedly acknowledge that the development site forms part of a connected ecological landscape associated with Horn Brook, woodland belts, hedgerows and wider riverine and habitat corridors

extending into the surrounding countryside. The EclA specifically recognises that Horn Brook forms part of a wider

riverine network connected to the River Arun, while the reports also identify habitat connectivity associated with

woodland, riparian corridors, bat commuting routes and priority hedgerows.

The documents further confirm the presence of numerous ecologically sensitive features and constraints

including:

- Hedgerows classified as Habitat of Principal Importance;
- Woodland qualifying as Lowland Mixed Deciduous Woodland Habitat of Principal Importance;
- Veteran and mature trees with bat roost potential;
- Bat commuting and foraging corridors;
- Protected species including bats, reptiles, otter and water vole;
- Strategic ecological connectivity recognised through Local Nature Recovery Strategy mapping;
- The site lying within the Impact Risk Zones for St. Leonard's Park Ponds SSSI and St. Leonard's Forest SSSI.

Despite this, the EclA repeatedly concludes that no significant residual ecological effects are anticipated.

However, these conclusions appear heavily dependent upon assumptions that extensive future mitigation and long-term ecological management measures will operate successfully and indefinitely.

The ecological submissions collectively rely upon:

- Future Construction Environmental Management Plans (CEMP);
- Future Biodiversity Mitigation and Enhancement Plans (BMEP);
- Future Landscape and Ecological Management Plans (LEMP);
- Future lighting strategies and controls;
- Future ecological supervision and Ecological Clerk of Works involvement;
- Future habitat creation and enhancement schemes;
- Future visitor management and behavioural controls;
- Future monitoring and ongoing maintenance regimes.

The later Ecological Walkover Survey additionally demonstrates that ecological conditions and evidence remain

fluid and evolving. The survey confirms that:

- Great Crested Newt surveys are now out of date and require updating;
- Additional surveys are now required for otter and water vole due to proposal changes;
- Bat survey validity periods are expiring or expired;
- Ecological assumptions are dependent upon the site remaining "largely unchanged";
- Habitat conditions and vegetation structure continue to evolve over time.

This raises concern regarding the robustness and longevity of the EclA's conclusion that no significant residual ecological effects are anticipated.

The ecological material also appears to assess habitats and species assemblages largely as isolated components

of merely "local" importance, while simultaneously acknowledging the existence of interconnected ecological

corridors and wider landscape connectivity associated with Horn Brook, woodland edge habitats and priority

hedgerows.

Particular concern remains regarding the cumulative long-term impacts likely to arise from urban edge pressures

including:

- Increased artificial lighting;
- Recreational disturbance;
- Domestic pets;

- Fragmentation of habitat corridors;
- Increased human activity adjacent to retained ecological buffers;
- Pressure upon veteran trees and retained woodland edge habitat.

The extensive mitigation regime itself demonstrates the environmental sensitivity and ecological complexity of the site. Measures proposed now include ecological buffer zones, reptile translocation, exclusion fencing, habitat manipulation, signage, visitor management measures, lighting engineering and extensive future ecological supervision.

Taken cumulatively, the ecology documentation does not present the picture of an environmentally unconstrained site. Rather, it presents a development proposal that appears dependent upon multiple layers of future ecological intervention, mitigation and management in order to avoid significant long-term ecological harm.

I respectfully request that very careful consideration is given to whether the proposal genuinely satisfies the requirements of the National Planning Policy Framework relating to biodiversity protection, ecological networks, habitat connectivity and irreplaceable habitat before any planning permission is granted.

[REDACTED]

Kind regards

Telephone:

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**Horsham
District
Council**



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