

From: Planning@horsham.gov.uk <Planning@horsham.gov.uk>
Sent: 18 May 2026 15:01:33 UTC+01:00
To: "Planning" <planning@horsham.gov.uk>
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 18/05/2026 3:01 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:	5 Dickins Way 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 - Other - Overdevelopment - Privacy Light and Noise - Trees and Landscaping
Comments:	I am writing to register my strongest possible objection to the outline planning application referenced above for the construction of up to 180 dwellings at Hornbrook Farm. I request that Horsham

District Council (HDC) refuse this application due to severe conflicts with the statutory development plan, premature reliance on an unadopted Local Plan, landscape encroachment, infrastructure deficits, and failure to meet strict statutory environmental regulations.

The application fails to meet the basic statutory requirements for sustainable development and must be rejected on the following grounds:

1. Fundamental Conflict with the Statutory Development Plan (HDPF 2015)

Section 38(6) of the Planning and Compulsory Purchase Act 2004 dictates that planning applications must be determined in accordance with the active development plan unless material considerations indicate otherwise.

Policy 3 (Development Hierarchy) & Policy 4 (Settlement Expansion): The application site lies outside the defined built-up area boundary of Horsham and is strictly classified as unallocated countryside. Policy 4 explicitly restricts settlement expansion unless a site is allocated within the Local Plan or a Made Neighbourhood Plan. This site has no such status.

Policy 26 (Countryside Protection): This policy dictates that development outside settlement boundaries will only be permitted if it maintains the quality and character of the landscape. Building 180 suburban dwellings on 9.23 hectares of open arable land and modified grassland constitutes an irreversible urban sprawl that fails to protect or enhance the rural character of the countryside.

2. Technical Illegality of the Developer's Premature Framework & Local Plan Status

The applicant's Design & Access Statement attempts to justify this development by citing Draft Allocation HOR1 and the Council's Shaping Development in Horsham District Policy Advisory Note (SDPAN). This planning rationale is legally flawed:

Failure of the Emerging Local Plan: As documented in the submission papers, in April 2025, the Examining Planning Inspector issued an Initial Findings Letter advising HDC to withdraw the emerging Local Plan 2023-2040 due to fundamental soundness issues. While a new Inspector has been appointed and the Examination in Public (EIP) continues toward later in 2026, the plan remains unadopted.

The Weight of Allocation HOR1: Under Paragraph 48 of the National Planning Policy Framework (NPPF), emerging plans may only be given weight according to their stage of preparation and the extent to which there are unresolved objections. Given the previous Inspector's recommendation for full withdrawal, the emerging plan is highly contested and unstable. Draft Allocation

HOR1 holds virtually zero statutory weight.

Precedent (Hopkins Homes Ltd v SQQS [2017] UKSC 37): The Supreme Court clarified that while a lack of 5-year housing land supply triggers the 'tilted balance', it does not invalidate policies designed to protect the environmental integrity of the countryside. The HDPF 2015 remains the sole statutory document guiding development, and its countryside protection barriers must be strictly upheld.

3. Irremediable Impact on the High Weald National Landscape Buffer

The eastern boundary of the application site immediately interfaces with Doomsday Lane, acting as a critical landscape buffer to the High Weald National Landscape (formerly Area of Outstanding Natural Beauty / AONB).

Policy 25 (The Natural Environment and Landscape Character): Requires that the landscape character of the district, including the setting of protected landscapes, must be protected from inappropriate development.

NPPF Paragraph 182: Great weight must be given to conserving and enhancing the landscape and scenic beauty of National Landscapes. Urbanizing this site with high-density housing up to the boundary completely disrupts the visual transition and views into and out of the High Weald. The developer's proposed 115m built-development offset to Doomsday Lane is an explicit admission of the severity of the edge impact, yet it fails to mitigate the broader loss of open views and light pollution profiles into this protected setting.

4. Loss of Biodiversity and Habitat Disturbance

The baseline ecological assessment submitted by the applicant notes that the site comprises 5.75 hectares of cereal crop fields, 2.08 hectares of modified grassland, and over 1.19 hectares of neutral grassland, bordered by high-distinctiveness, species-rich native hedgerows with mature trees.

Policy 31 (Green Infrastructure and Biodiversity): Development must ensure that biodiversity is protected and enhanced. The physical removal of over 5 hectares of open foraging ground for local avian and mammalian species cannot be adequately mitigated by squeezed, high-maintenance suburban green ribbons.

While the applicant claims a nominal 10.09% Biodiversity Net Gain (BNG) utilizing the Statutory Metric, this calculation relies heavily on a highly speculative "Moderate" target condition for urban vegetated gardens and neutral grassland corridors interwoven within a bustling 180-home layout. This is unrealistic, fails to account for subsequent household domestic pressures,

and directly conflicts with the Environment Act 2021 statutory mandates.

5. Severe Highway Safety and Access Constraints (A281 Brighton Road)

The application proposes inserting a high-volume vehicular access point onto the A281 Brighton Road, which is already a heavily congested, fast-moving strategic route into Horsham.

Policy 40 (Sustainable Transport) & Policy 33 (Development Principles): The introduction of vehicle movements associated with 180 homes will create severe junction delays and safety conflicts.

Furthermore, draft allocation criteria historically required safe pedestrian and cycling crossing points over the A281. For an outline application with all matters reserved except access, the developer has failed to demonstrate a physically achievable, safe layout for pedestrian integration across a strategic A-road without creating a severe hazard to highway safety, failing the test set out in NPPF Paragraph 115.

6. Unsustainable Strain on Local Infrastructure (Education and Healthcare)

Policy 39 (Infrastructure Provision): The HDPF 2015 explicitly mandates that new development will only be permitted if it is supported by necessary infrastructure, including health and education facilities, to meet the needs of the community.

The introduction of up to 180 family homes will generate significant additional demand on local primary schools, secondary education, and already over-stretched GP surgeries within Horsham.

The Issue of Prematurity: Because the emerging Local Plan 2023-2040 is legally unstable and currently unadopted, there is no up-to-date infrastructure-delivery framework or spatial strategy to accommodate this growth. Relying on piecemeal financial contributions (S106/CIL) cannot mitigate the physical deficit of capacity in local surgeries and schools. Permitting a large-scale development on unallocated land before a robust, district-wide infrastructure assessment is completed violates Policy 39 and constitutes unsustainable development under the NPPF.

7. Fundamental Failure to Satisfy Specific Site Constraints and Statutory Enactments

Even if the Council evaluates this application against future planning intentions, the development represents an un-deliverable over-development that breaches severe technical boundaries:

Sussex North Water Neutrality Mandate: The application site falls entirely within the Sussex North Water Resource Zone. The

applicant has failed to provide a legally robust, scientifically verified mechanism to achieve absolute water neutrality, creating an unmitigated threat to the Arun Valley Special Area of Conservation. Under the Conservation of Habitats and Species Regulations, the Council is legally barred from granting permission.

Direct Violation of Allocation Capacity: Should the emerging Local Plan be adopted in the future, Draft Policy HA10 strictly limits the allocation capacity of Land at Hornbrook Farm (HOR1) to a maximum of 100 dwellings to preserve settlement boundaries and landscape transitions. The applicant's speculative attempt to cram 180 dwellings-an unauthorized 80% uplift-directly violates the spatial density, landscape buffering, and sustainable masterplanning framework envisioned by the Council.

Unresolved Flood Risk and Surface Water Run-off: The site slopes directly toward the Horn Brook watercourse on the northern boundary. The application lacks hydrological guarantees that the displacement of natural grassland with 9.23 hectares of impermeable surfaces will not exacerbate documented surface water flooding downstream onto local infrastructure, failing the sequential safety requirements of the NPPF.

Conclusion

This application represents a premature attempt by speculative developers to exploit a transitional window in Horsham's Local Plan examination. It directly violates HDPF Policies 3, 4, 25, 26, 31, 39, and 40. The site remains open countryside, and its development would fundamentally harm the setting of the High Weald National Landscape, compromise highway safety on the A281, violate water neutrality laws, and severely overload local schools and surgeries.

For these reasons, I urge the Planning Committee to uphold the statutory development plan and refuse planning permission for application DC/26/0530.

I look forward to receiving formal acknowledgment of this objection and notification of the committee meeting date.

Yours faithfully,

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