

**From:** Planning@horsham.gov.uk <Planning@horsham.gov.uk>  
**Sent:** 11 June 2026 18:07:34 UTC+01:00  
**To:** "Planning" <planning@horsham.gov.uk>  
**Subject:** Comments for Planning Application DC/26/0671  
**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 11/06/2026 6:07 PM.

### Application Summary

|               |                                                                                                                                      |
|---------------|--------------------------------------------------------------------------------------------------------------------------------------|
| Address:      | Land Off Old Crawley Road Faygate West Sussex                                                                                        |
| Proposal:     | Outline Application for a development of up to 120 dwellings (including 45% affordable) with all matters reserved except for access. |
| Case Officer: | Sam Whitehouse                                                                                                                       |

[Click for further information](#)

### Customer Details

Address: 124 Lambs Farm road Horsham

### Comments Details

|                      |                                                                                                                                                                                                                                                                                                                         |
|----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Commenter Type:      | Member of the Public                                                                                                                                                                                                                                                                                                    |
| Stance:              | Customer objects to the Planning Application                                                                                                                                                                                                                                                                            |
| Reasons for comment: | <ul style="list-style-type: none"><li>- Highway Access and Parking</li><li>- Loss of General Amenity</li><li>- Overdevelopment</li><li>- Privacy Light and Noise</li><li>- Trees and Landscaping</li></ul>                                                                                                              |
| Comments:            | lobject to the outline application for up to 120 dwellings on farmland off Old Crawley Road, Faygate. The proposal would introduce substantial residential development onto a 4.9-hectare arable field wholly within the High Weald National Landscape on the edge of Horsham. It would conflict with national planning |

policy and the Horsham District Planning Framework because the site lies outside any defined built-up area and is not allocated for housing. The development would erode the landscape character of the High Weald, narrow the gap between Horsham, Faygate and Crawley, encourage car-dependent living, harm the setting of nearby heritage assets and archaeological remains, and fail to secure adequate ecological and infrastructure mitigation.

The proposal conflicts with the development plan taken as a whole and the applicant has not demonstrated material considerations sufficient to outweigh that conflict. The benefits of delivering housing, including affordable homes, are acknowledged, but they do not outweigh the clear conflict with the development plan, the NPPF paragraph 190 test and the harm to the High Weald National Landscape.

#### Reason 1: Unjustified major development in the High Weald National Landscape

The site lies wholly within the High Weald National Landscape (formerly Area of Outstanding Natural Beauty). Paragraph 189 of the National Planning Policy Framework (NPPF) requires great weight to be given to conserving and enhancing landscape and scenic beauty in National Landscapes. Paragraph 190 states that permission should be refused for major development in National Landscapes except in exceptional circumstances and where it can be demonstrated to be in the public interest. The decision maker must assess the need for the development, whether it could be met outside the designated area, the environmental, landscape and recreational effects and the extent to which these could be moderated.

Given the scale of up to 120 dwellings, the site's location wholly within a nationally protected landscape and the likely significant landscape effects, the Council should treat this scheme as major development for the purposes of paragraph 190. The application fails each limb of the NPPF test:

- Exceptional circumstances have not been demonstrated. There is no housing allocation for this land and the applicant has not shown that the identified housing need could not be met outside the National Landscape, on allocated sites, on previously developed land or on less sensitive sites. No meaningful assessment of alternative locations has been provided.
  - The applicant has not demonstrated that the proposal is in the public interest when assessed against the scale of landscape
-

harm, the availability of less sensitive alternatives and the unresolved impacts on transport, heritage, ecology and infrastructure.

- The environmental, landscape and recreational harm is significant. The proposal would introduce residential streets, lighting, access infrastructure and urban built form into an open arable field, eroding the small irregular field pattern, hedgerows, tranquillity and dark skies that characterise the High Weald. The loss of open farmland and the sense of space would diminish recreational enjoyment of the rural edge.

- The harm cannot be effectively moderated. Although the applicant proposes planting and open space, these measures cannot replicate the intrinsic landscape qualities of an open field in a National Landscape.

The proposal should also be considered against the statutory purpose of conserving and enhancing the natural beauty of the High Weald National Landscape. The fact that the site is currently undeveloped farmland is not a neutral baseline; its openness, field pattern, hedgerows and rural character form part of the landscape value that the designation is intended to protect.

Even if the Council considers that the "tilted balance" is engaged because of housing land supply or plan age, this does not remove the statutory and national policy protection afforded to the High Weald National Landscape. The NPPF gives National Landscapes the highest status of protection in relation to landscape and scenic beauty, and the specific paragraph 190 test remains central to the decision.

## Reason 2: Conflict with spatial strategy and countryside protection

The site lies outside any defined built-up area boundary and is not allocated for development in either the adopted Horsham District Planning Framework (HDPF 2015) or the emerging Local Plan. HDPF Policy 26 (Countryside Protection) allows development outside built-up areas only when it is essential to a countryside location and does not lead to a significant increase in activity or urbanisation. Residential development of up to 120 dwellings is not essential to this countryside location and would urbanise farmland, contrary to this policy. The emerging Local Plan continues this approach and has not allocated this land for housing. Approving the proposal would prejudice the plan-led approach to meeting housing needs and undermine confidence in adopted policies. The fact that the application is at outline stage does not reduce the harm arising from the principle of placing up

---

to 120 dwellings on this site.

### Reason 3: Settlement coalescence along the Horsham-Crawley / A264 corridor

Strategic Policy 15 (Settlement Coalescence) of the emerging Local Plan seeks to retain openness between settlements along the A264 corridor and avoid ribbon development that would diminish the separate identity of Horsham, Faygate and Crawley. The application site lies between Horsham and Faygate on the A264 corridor. Developing 120 homes here would narrow the gap between settlements and contribute to coalescence and urban sprawl. Even if limited weight is given to the emerging policy, the physical and visual narrowing of the settlement gap remains a material planning harm. This weighs heavily against the scheme.

### Reason 4: Unsustainable location and car dependence

The application proposes 207 car parking spaces for 120 dwellings, revealing an expectation that households will rely on private cars. Faygate has very limited services: there is only one primary school and no doctors' surgery. Residents already depend on facilities in Horsham or Crawley. The applicant's Framework Travel Plan asserts that most amenities are within a two-kilometre walking catchment, but its own accessibility table shows that primary schools, doctors and convenience stores are 1.5 to 3.5 kilometres away, equating to 20-40 minutes on foot. Larger facilities, such as Horsham Hospital and supermarkets, are over 3 kilometres away. Littlehaven rail station is about 2.2 kilometres away, and the nearest bus stop is about 430 metres away.

While some facilities may fall within theoretical walking distances, the applicant's own table shows that several essential services are beyond convenient everyday walking range. For many residents, particularly families, older people and those with limited mobility, the site is therefore likely to remain car-dependent. Although bus services are available, the application does not demonstrate that their frequency, operating hours, destinations and long-term security are sufficient to make the development genuinely non-car-dependent. The development therefore does not provide a genuinely sustainable location and fails to offer a real choice of transport modes, contrary to NPPF guidance that significant development should be focused on locations that are or can be made sustainable.

The proposal also lacks a genuine strategy for modal shift: there

---

are no firm commitments to improve bus frequency, provide off-site cycle links or reduce parking provision. The cumulative transport impact of this development with the 2,750-home North Horsham scheme has not been properly assessed. Approving this site risks adding further pressure to the A264 corridor and local roads without demonstrating that the necessary sustainable transport infrastructure will be delivered.

#### Reason 5: Heritage, archaeology and historic landscape harm

The site lies adjacent to Newhouse Farm and near several Grade II listed buildings along Old Crawley Road. HDPF Policy 34 (Cultural and Heritage Assets) requires that development conserves heritage assets and their settings. Extending modern estate housing onto this rural field would harm the setting of these heritage assets by eroding their agricultural context and introducing a suburban estate into their views.

The applicant's Historic Environment Desk-Based Assessment identifies a high potential for prehistoric deposits (Palaeolithic, Mesolithic and Neolithic flint scatters) and a moderate potential for medieval and post-medieval features within the site. It recommends further fieldwalking, geophysical survey and trial trenching to establish the extent of the prehistoric site known as "The Plain" and to inform a mitigation strategy. None of these investigations appears to have been completed before determination. It would therefore be premature to grant even outline permission unless the County Archaeologist is satisfied that appropriate evaluation, mitigation and preservation measures can be secured.

#### Reason 6: Ecology, trees, biodiversity net gain and lack of secured mitigation

The field is enclosed by hedgerows and mature trees. HDPF Policies 31 (Green Infrastructure and Biodiversity) and 33 (Development Principles) require developers to protect existing green infrastructure and deliver a net gain for biodiversity. The application form acknowledges that trees and hedges may be affected, yet provides little detail on root protection areas or hedgerow retention. The application should be supported by a full arboricultural impact assessment, including root protection areas and clear plans for hedgerow and boundary tree retention. Without detailed surveys and protection measures, there is a risk of harm to important boundary trees. Where arboricultural, ecological or habitat-management details are incomplete, the Council cannot safely conclude that the development would

---

protect green infrastructure or deliver lasting biodiversity gains.

The applicant's Statutory Biodiversity Metric sets a baseline of 9.89 habitat units and 2.99 hedgerow units on the site and claims a post-development figure of 14.22 habitat units and 4.33 hedgerow units. These headline gains rely on converting arable land to urban greenspace, scrub and woodland. The claimed biodiversity gains should be given limited weight unless they are secured through an enforceable Biodiversity Gain Plan, habitat management and monitoring plan, and appropriate legal mechanism for at least 30 years. The Environment Act 2021 requires a minimum 10 per cent net gain, and recent refusals, such as the Holme Farm Orchard case at Barns Green (DC/22/2045), demonstrate that inadequate ecological information and uncertainty over habitat delivery can justify refusal.

#### Reason 7: Drainage, water efficiency and infrastructure

Given the local ground conditions and the scale of impermeable surfacing proposed, the Council should require a robust surface water drainage strategy demonstrating suitable sustainable drainage systems (SuDS), attenuation, exceedance routes, maintenance responsibilities and no increase in flood risk elsewhere. The application proposes to connect foul sewage to the mains sewer but provides little detail on surface water management. New development should incorporate water-efficiency measures and demonstrate that it will not harm sensitive habitats through increased abstraction or discharge. The applicant has not shown how water use will be minimised through high water-efficiency standards or whether measures such as rainwater harvesting could be incorporated.

In addition, the outline application does not contain a completed Section 106 agreement to secure the necessary affordable housing, highway mitigation, sustainable drainage, open space, education, healthcare and other infrastructure contributions. Planning permission should not be granted unless these obligations are secured through a completed Section 106 agreement and/or robust planning conditions where appropriate. Without secured mitigation, there is a serious risk that essential infrastructure will not materialise and that the community will bear the cost of supporting the development.

#### Planning balance and conclusion

The benefits of the scheme, including market and affordable

---

housing, are acknowledged, but they do not outweigh the clear conflict with the development plan, the NPPF paragraph 190 test and the harm to the High Weald National Landscape. The scheme would urbanise open farmland, reduce the separation between Horsham, Faygate and Crawley, promote car-dependent living, harm heritage assets and archaeological remains, fail to provide sufficient certainty over the protection of boundary trees and hedgerows, rely on unsecured biodiversity gains, and lack a comprehensive drainage and infrastructure strategy. The applicant has not demonstrated exceptional circumstances or public interest sufficient to justify major development in this nationally protected landscape. For the reasons set out above, I respectfully request that the application be refused.

---

Kind regards

**Telephone:**

**Email:** [planning@horsham.gov.uk](mailto:planning@horsham.gov.uk)



**Horsham  
District  
Council**

---

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