
From: [REDACTED]
Sent: 02 June 2026 09:24
To: [REDACTED]
Subject: Objection DC/26/0530 - Land at Hornbrook Farm Brighton Road West Sussex
Attachments: Objection letter_DC260530 - Land at Hornbrook Farm Brighton Road West Sussex_ [REDACTED] 6 Ghyll Crescent, Horsham.pdf
Categories: Comments Received

Dear Nicola and the HDC planning team
Dear HDC Forest Councillors
Dear WSCC Councillors
Dear [REDACTED]

Good morning

As a resident of 6 Ghyll Crescent, Horsham RH13 6BG, United Kingdom, I have been following developments related to land at Hornbrook closely ever since this land was proposed in the Horsham Local Plan. Sadly inspite of all constructive feedback, no changes have been made to the proposals.

As an advocate for sustainable development and keeping with the spirit of providing housing for the growing population, I am always supportive of sensible proposals. Sadly this outline planning permission is anything but sensible. I am joined by 100s of residents who have now objected and will be legally willing to fight this in court given the flaws of the proposal and the harm it causes.

It pains me how greedy, undue political pressure from London to build at all costs and disregard for process, this proposal has come to this stage and is now being considered later this week by the council. The greed of it is evident from the sheer fact that while the local plan talked of 100 odd houses, the planning application already bumps it up 2x to 180 and guess what if this goes ahead unchecked, the developer will probably seek to build 300 or so houses.

With massive greenfield developments at Mobray etc, Horsham district is ahead of plan for its housing targets either way. To push this brownfield development in this fragile part of town where the infrastructure is not adequate for current demand, is at the edge of AONB and has significant implications on traffic, pressure of essential infrastructure, harm to the ecology, significant flooding risk, all with little to no gain.

I have formally objected on the portal, a copy of my submission stands attached. For ease of reference I summarize this below:-

1. Procedural Deficiencies and Failure of Consultation

This site has been subject to multiple refusals over the past two decades. There is no material change in circumstances that would justify a different outcome. Despite this, the application has progressed without:

- Proper and meaningful community consultation
- Engagement with key stakeholders (including local schools and infrastructure providers)

- Alignment with the Horsham Local Plan

The increase in scale from circa 100 to approximately 180 dwellings further demonstrates a lack of transparency and good faith engagement. The process does not meet the standards of robust, evidence-led planning.

2. Non-Compliance with Design and Landscape Policies

The proposal fails to meet the requirements of the **NPPF (paras 130, 131, 134)** and **Horsham Local Plan Policy 32**. It lacks sufficient detail, fails to respond to local character, and would result in a visually intrusive development at a sensitive gateway location adjacent to an AONB. Poor design, by definition, should be refused.

3. Highways and Access – Severe Safety Impacts

The transport assessment is materially deficient and unreliable, having been conducted under unrepresentative conditions. A development of this scale reliant on a **single point of access** presents an inherent and unacceptable risk:

- Increased congestion and traffic displacement
- Deterioration in pedestrian and road safety
- Failure to provide safe and suitable access as required by **NPPF paras 114–116** and **Local Plan Policy 40**

The cumulative transport impact has not been properly assessed and is likely to be severe.

4. Loss of Landscape Character and Amenity

The site forms part of a valued open landscape at the edge of an AONB and contributes to the setting of Horsham as a historic market town. Development would:

- Result in irreversible loss of countryside character
- Fail to integrate into the existing landscape
- Cause substantial harm to visual amenity

This is contrary to **NPPF para 174** and **Local Plan Policy 25**.

5. Overdevelopment and Unsustainable Location

The density proposed exceeds the capacity of the site and constitutes clear overdevelopment. The site is poorly connected and lacks supporting infrastructure, unlike allocated growth areas. This conflicts with **NPPF para 124** and policies requiring development to respect site constraints and avoid urban sprawl.

6. Harm to Residential Amenity

Due to the elevated topography of the site, the development would result in:

- Overlooking and loss of privacy
- Light intrusion and noise impacts
- Significant visual dominance over neighbouring properties

This is a clear breach of **NPPF para 130(f)** and **Local Plan Policy 33**.

7. Ecology, Biodiversity, and Tree Loss

The proposal fails to adequately protect existing ecological assets, including trees, hedgerows, and wildlife corridors. Mitigation measures are insufficient and do not meet the requirements of **NPPF paras 131(c), 174(b)** and **Local Plan Policies 25 and 31**.

8. Inadequate Evidence Base

The application relies on incomplete, outdated, and assumption-led assessments. This directly conflicts with **NPPF para 189**, which requires decisions to be based on robust and up-to-date evidence. Critical issues—including traffic, drainage, and environmental impact—have not been properly or transparently assessed.

9. Flood Risk – Failure to Demonstrate Safety

The flood risk strategy is fundamentally unsound:

- Over-reliance on high-level modelling and undeveloped SuDS design
- Failure to address proximity to Flood Zone 3 and Horn Brook
- No robust evidence that flood risk will not increase elsewhere
- Lack of clarity on long-term maintenance and system resilience

This does not meet NPPF requirements or local flood risk policy and exposes both the site and surrounding areas to unacceptable risk.

10. Absence of a Comprehensive Environmental Impact Assessment

Given the scale and sensitivity of the site, the absence of a full **Environmental Impact Assessment (EIA)** is a critical failing. The submission of fragmented technical documents does not substitute for a cumulative assessment of environmental effects. The local planning authority cannot lawfully conclude that the development would not give rise to significant adverse impacts.

Conclusion

This application represents **unsustainable, policy-conflicting, and poorly evidenced development**. It causes demonstrable harm across multiple planning considerations, with no overriding public benefit.

Approval would be contrary to the **NPPF**, the **Horsham Local Plan**, and principles of sound decision-making. It would also be highly vulnerable to legal challenge.

I therefore strongly urge the Council to **refuse permission**.

Yours faithfully,



Dear Planning Team, HDC

I would like to strongly object to this proposed planning application referenced DC/26/0530 - Land at Hornbrook Farm Brighton Road West Sussex like so many of the residents in the area have already done. At the outset, let me recap what I see is flawed in the process of this application and the approach taken including historical context:-

1) This very site has been refused planning permission on all occasions in the last 20 years, there were 2 attempts made in the past and what is shocking is that in spite of no changes to the underlying conditions which led to the refusal and rather increase of factors which need mitigation (traffic, road safety, environmental protection etc), this proposal is being entertained informally by the council

2) The process in the lead up to this application in consulting the community, informing the relevant stakeholders (local schools), being compliant with regard to Horsham local plan have all been ignored. The community engaged was all about sharing the plans and not taking any feedback. While the initial intent was 100 odd houses, this has been now raised to 2x that amount. I know for a fact, local schools etc like Heron Way have not been informed or consulted when they need to be able to cater to the increased load from new families. The list goes on.

3) Council is enabling this by not challenging basic things which will be legally challenged if this proceeds like no need for an EIA, raising the proposed housing to 2x that stated amount in the intention of the local plan, underlying studies done using desktop research or done in a manner which is flawed i.e. doing a traffic assessment missing out key roads in the quietest of times during the year (Aug) and during the day (miss out school hours) etc

Coming to my formal objection to this application on the parameters above and policy from the council and national planning framework

1) Design: The proposal is so high level, that it can be twisted by the developer so easily if this is allowed to proceed. Keeping in mind the AONB and that this development is at the entrance of a historic town, these design flaws are most unfortunate. Here are the contradictions to NPPF and Horsham Local Plan

NPPF

Para 130: requires developments to be sympathetic to local character and history and establish a strong sense of place

Para 131: requires developments to be visually attractive and consistent with local policies

Para 134: permission should be refused for development of poor design that fails to take opportunities to improve character

Horsham Local Plan

Policy 32 – The Quality of New Development

Requires development to:

reflect local character

respond to landscape setting

provide high quality design

2) Highway Access and Parking: Here is one of the strongest flaws in this application. Traffic assessment was done at the wrong time in a wrong way. Proposed access in/out of the site is for this volume of houses is limited to 1 point creating a choke. With no improvement in surrounding road infrastructure, this increases traffic significantly on the surrounding roads and creates safety issues for pedestrians which is already a challenge in this part of town. Here is the contradictions to NPPF and Horsham Local Plan

NPPF

Para 114: development should ensure safe and suitable access for all users

Para 115: sustainable transport opportunities should be taken up

Para 116: development should only be refused where impacts are “severe”

Horsham Local Plan

Policy 40 – Sustainable Transport

Requires:

safe access

promotion of sustainable modes

3) Loss of General Amenity: This open green space of land is at the edge of an AONB. It is at the entrance of an historic market town. The elevation of this land is very high and any development will cause loss of open countryside and visual amenity. If approved, this will NOT integrate into the landscape and stand out as a piece of ill thought development standing out of character. Objections noted below

NPPF

Para 130(c): development should create places that are attractive and maintain a high standard of amenity

Para 174: decisions should contribute to and enhance the natural environment

Horsham Local Plan

Policy 25 – The Natural Environment and Landscape Character

Development must:

conserve landscape character

protect beauty of the countryside

4) Overdevelopment: I am all for new housing that is sustainable and serves the growing needs of the community. Sadly this proposed planning application does exactly the opposite. It is in the wrong side of town, is cut off from bigger and better planned developments coming up which have the supporting infrastructure (read Mobray) and is being pushed at all costs with underlying greed (read 180 proposed units vs an original plan of 100). Hence its fair to conclude very clearly - Density exceeds site capacity and harms landscape edge.

NPPF

Para 124: development should make efficient use of land but not at the expense of:

local character

environmental quality

Horsham Local Plan

Policy 32 – Quality of New Development

Policy 26 – Countryside Protection (if outside settlement boundary)

Requires:

development to:

respect site constraints

avoid urban sprawl

5) Privacy, Light and Noise: As noted, this is on a piece of land with significant elevation. It creates significant loss of privacy for all of us who surround the development as houses overlook our gardens. Light population caused with the elevated nature of this land will cause disruption both to residents around and also wildlife which is abundant as this is at the edge of AONB and have wildlife corridors due to the brook. Lastly in winter when the trees lose their leaves, this development will stand out visually due to elevation of the land. Objections below

NPPF

Para 130(f): development should create places with a high standard of amenity for existing and future users

Horsham Local Plan

Policy 33 – Development Principles

Requires protection of:

privacy

daylight

noise conditions

6) Trees and landscaping: Relates to the objections above. Loss of trees/hedgerows and insufficient mitigation.

NPPF

Para 131(c): development should enhance the natural environment by:

recognizing intrinsic character of the countryside

Para 174(b): protect and enhance biodiversity and natural habitats

Horsham Local Plan

Policy 31 – Green Infrastructure and Biodiversity

Development must:

protect ecological networks

provide enhancements

Policy 25 – Landscape Character

7) Others

7a. The applications if flawed as it has an over-reliance on assumptions, modelling, and future conditions. This is a huge issue per my opening remarks

NPPF

Para 189: planning decisions should be based on adequate, relevant and up-to-date evidence

Para 55: conditions should only be used where necessary and precise, not to defer essential detail

Horsham Local Plan

Policy 1 – Strategic Policy

Requires development to be:

sustainable

supported by robust evidence

7b. The proposed development ignores flooding risk. The applicant has not demonstrated with sufficient certainty that the site will be safe over its lifetime or that the development will not increase flood risk on or off site. The reliance on high-level modelling, assumptions, and future design detail means the proposal does not meet the requirements of the NPPF or Horsham flood risk policy. See below

The development relies on the fact that houses are in Flood Zone 1, but ignores the wider site context, including proximity to Flood Zone 3 and Horn Brook, meaning risk is shifted rather than removed.

- The Flood Risk Assessment is overly simplistic, treating flood risk as acceptable without fully assessing:
 - site-wide hydrology
 - impact on drainage infrastructure and open space

- The drainage strategy is conceptual, not detailed, and depends heavily on SuDS (swales, basins) that are:
 - not fully designed
 - not proven to work given limited ground infiltration
- There is over-reliance on a single discharge point (Horn Brook) without clear evidence that:
 - downstream capacity exists
 - cumulative impacts are acceptable
- The assessment does not robustly demonstrate that:
 - flood risk will not increase elsewhere
 - the system will remain effective under climate change conditions
 - Exceedance events (extreme rainfall) are not adequately addressed, meaning floodwater pathways across the site remain uncertain.
- Long-term maintenance is unclear, with no confirmed management structure or funding mechanism to ensure SuDS continues to function properly.

7c. The application fails to provide a comprehensive Environmental Impact Assessment despite the scale and sensitive location of the development. While individual technical reports are provided, these do not assess the cumulative, in-combination effects of the proposal on the environment. The absence of an EIA results in a fragmented and incomplete understanding of the development's true impacts, particularly in relation to landscape, ecology, drainage, and amenity. As such, the council should not be satisfied that the proposal will not give rise to significant adverse environmental effects, contrary to the requirements of the EIA Regulations, the NPPF, and Horsham District planning policies.

In conclusion, this is an ill thought development which has been refused many times before and should be refused this time as well. We should not let greed by-pass rule of law. The volume of objections received shows how unpopular this is with the local community. There are many reasons for which this can and will be challenged if the council decides to proceed with this. An approval harms the local community, environment and compensates very little to the needs of Horsham

Many thanks

