

From: Planning@horsham.gov.uk <Planning@horsham.gov.uk>
Sent: 16 May 2026 15:02:39 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 16/05/2026 3:02 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
----------	--------------------------

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:	I have reviewed three of the developers studies and submit my comments as follows:-

Great Crested Newt and Otter survey

This report has several potentially significant weaknesses - especially around the Horn Brook corridor and the way uncertainty is converted into "negligible importance".

The most important point is this:

"They repeatedly acknowledge possible evidence of protected species, but still conclude the site has 'Negligible Importance'."

That is a vulnerable position in planning and ecological terms.

1. The otter conclusion is internally contradictory

The report states:

- no field signs found,
- but remote cameras captured "suspected otter commuting" twice,
- then concludes the site is of "Negligible Importance for otter".

Later the report admits:

- otters "may use Horn Brook as a commuting route".

This is important because under current planning policy, ecological corridors themselves matter - not just breeding sites.

The weakness is:

- they equate "no holt" with "negligible importance".

But:

- commuting corridors are ecologically important,
- especially in fragmented peri-urban landscapes.

The NPPF specifically protects ecological networks and wildlife corridors.

Therefore:

Their own evidence supports functional ecological use of Horn Brook.

2. Incomplete access to the brook is a major weakness

The report admits:

"No access was possible in the western, off-site portion of the brook."

This is critical because:

- mammals use continuous riparian corridors,
- holts/resting sites are often outside development parcels,
- activity may occur upstream/downstream.

Yet despite incomplete access:

- they still conclude negligible importance.

This is weak reasoning.

Especially problematic:

- they could not access the more vegetated section,
- which is often the best habitat.

3. They did not fully survey the north bank

The report admits:

"it was not possible to extensively survey the full 10m of riparian habitat north of Horn Brook"

Yet:

- they still conclude no meaningful otter use.

That is not a robust absence conclusion.

The wording:

"observable from afar"

is particularly weak for protected mammal surveys.

4. Water vole evidence is more serious than they admit

They found:

- two burrows matching water vole characteristics.

They also acknowledge:

- desk-study water vole records nearby.

Yet they conclude:

- "Negligible Importance".

This is vulnerable because:

- water voles are difficult to confirm at low densities,
- shaded streams can still support transient populations,
- fragmented colonies are common.

Importantly:

They did not rule out presence.

They explicitly say:

"presence ... was not able to be conclusively determined."

Yet they still reduce significance to negligible.

5. "Sub-optimal habitat" is asserted, not evidenced

They repeatedly rely on:

- "sub-optimal habitat",
- "unlikely",
- "low possibility".

But there is little quantitative habitat analysis.

For example:

- no vegetation structure analysis,
- no bank-profile analysis,
- no prey-resource analysis,
- no connectivity assessment,
- no lighting impact assessment,
- no future disturbance assessment.

The report is largely presence/absence driven rather than ecosystem-function driven.

6. The survey effort for water vole is limited

Only:

- two visits,
- one in May,
- one in September.

Given:

- potential burrows,
- incomplete access,
- adjacent records,

a stronger authority ecologist could reasonably ask for:

- additional seasonal surveys,
- or precautionary mitigation.

7. The report avoids discussing development impacts on the stream corridor itself

The report focuses almost entirely on whether species are present.

It says little about:

- lighting,
-

- domestic disturbance,
- runoff,
- pets,
- recreational pressure,
- habitat severance,
- hydrological change,
- or long-term management.

But the development is:

- up to 180 dwellings.

Even if species are currently sparse:
development can still degrade a functioning corridor.

8. Their mitigation proposal is weak

For possible water voles they propose:

- a pre-works inspection,
- and a 10m fenced buffer.

Weaknesses:

- no long-term management detail,
- no lighting controls,
- no SuDS pollution safeguards,
- no habitat enhancement,
- no monitoring,
- no construction hydrology protections.

9. The report appears designed to scope issues out early

Notice the pattern:

- possible otter → negligible
- possible water vole → negligible
- excellent GCN pond nearby → no issue
- incomplete access → not major
- suspected commuting → negligible

The cumulative effect is:

a consistent minimisation narrative.

10. The GCN assessment is more defensible than the mammal assessment

The negative eDNA results are reasonably persuasive.

However:

- they only surveyed two ponds,
- relying on earlier "scoping out" decisions for the others.

Overall strongest criticism:

The report demonstrates ecological use of Horn Brook by protected mammals, acknowledges incomplete survey coverage and uncertain water vole status, yet still concludes the corridor is of "Negligible Importance" without robust justification or meaningful assessment of functional ecological connectivity.

Ownership issue:

Since you own part of the stream corridor, check carefully whether:

- buffer zones,
 - fencing,
 - drainage outfalls,
 - habitat management,
 - maintenance access,
-

- ecological enhancement,
 - or bank stabilisation
- depend on land outside their ownership/control.

Ecological and Walkover Survey

This second report is more revealing than the first because it exposes survey gaps, expired ecology data, evolving design impacts, and inconsistencies in how ecological risk is characterised.

Several passages materially strengthen an argument that the Horn Brook corridor is ecologically significant and insufficiently resolved.

1. The report openly admits earlier surveys are now out of date

The report explicitly states:

- GCN surveys are out of date,
- bat surveys are expiring or expired,
- dormouse surveys are expiring,
- water vole/otter surveys became necessary because proposals changed.

This undermines any suggestion that ecology is fully understood.

2. The changing scheme appears to be driving ecology, rather than ecology shaping the scheme

The report states:

"potential changes in the proposals has resulted in a requirement for surveys for otter and water vole".

This implies:

- impacts were not fully assessed originally,
- ecological risks emerged after design evolution.

3. They admit parts of the site and adjacent habitats were not properly surveyed

The report states:

- dense scrub could not be comprehensively searched,
- neighbouring habitats could not be fully surveyed.

This matters because the most ecologically valuable areas are along Horn Brook and woodland edges.

4. The report quietly confirms the Horn Brook corridor is the most important ecological feature on the site

The report states:

"The most important area was the woodland and scrub along the Horn Brook".

This directly contradicts the earlier "Negligible Importance" tone.

5. The corridor is important for multiple species groups simultaneously

The report identifies the brook corridor as:

- breeding bird habitat,
 - bat commuting habitat,
 - bat foraging habitat,
 - otter habitat,
 - possible water vole habitat,
 - reptile refuge habitat,
-

- and ecological connectivity infrastructure.

Yet there is no:

- corridor functionality assessment,
- habitat fragmentation analysis,
- lighting contour analysis,
- edge-effect analysis,
- domestic disturbance modelling,
- or hydrological impact modelling.

6. Their reliance on "largely unchanged" is weak and repetitive
Repeatedly they state:

"character and condition largely unchanged therefore repeat surveys not necessary".

This is used for:

- birds,
- bats,
- dormice,
- reptiles.

This is weak scientifically because species presence changes faster than habitat appearance.

7. The 10m buffer looks increasingly inadequate

The corridor supports:

- breeding birds,
- bats,
- otter,
- possible water vole,
- reptiles,
- woodland-edge habitat.

Yet mitigation remains a ">10m vegetated buffer".

There is no demonstrated justification for why 10m is ecologically sufficient for a 180-dwelling development.

8. Lighting impacts are recognised - but not assessed

The report acknowledges:

"effects on... bats including through increases in artificial light".

Yet provides no:

- lux contour modelling,
- dark corridor mapping,
- lighting layout,
- cumulative illumination assessment,
- spill modelling onto Horn Brook.

This is important because rarer bats including barbastelle were recorded.

9. The invasive species issue is more serious than presented

The report records:

- Himalayan balsam,
- Rhododendron,
- American skunk cabbage.

Yet there is:

- no invasive species management plan,
- no biosecurity methodology,
- no construction containment strategy.

10. The report repeatedly minimises habitat loss despite large-scale change

The proposals involve loss of up to 9.51ha, yet much of the habitat is described as being of relatively low ecological value.

This may underestimate the cumulative ecological value of farmland mosaics and edge habitats.

11. They admit additional suitable bat trees may exist but were not surveyed

The report states:

"it is possible that additional suitable trees were present within the woodland which was not surveyed."

Again, uncertainty is acknowledged but operationally minimised.

12. "Third issue following client comments"

The report cover states:

"Third issue to the client following client comments".

This raises a reasonable question regarding what ecological conclusions or wording changed following client review.

13. The report strengthens the importance of the stream corridor ownership issue

The document repeatedly centres:

- Horn Brook corridor,
- woodland edge,
- riparian habitat,
- ecological buffers.

If mitigation relies on land outside the developer's ownership or control, this may represent a material delivery risk.

Strongest overall criticism:

The report increasingly recognises Horn Brook and its associated woodland edge as the principal ecological resource on the site, supporting multiple protected and priority species groups, yet continues to rely on incomplete, ageing and partially expired survey data while proposing relatively generic mitigation and narrow buffer zones without demonstrating that ecological functionality of the corridor will be maintained.

Hornbrook Ecological Impact Assessment Review

This Ecological Impact Assessment (EclA) contains several substantial weaknesses because it repeatedly acknowledges that the Horn Brook corridor supports multiple protected and priority species, yet still downgrades most ecological receptors to "Negligible" or "Local" importance without a convincing ecosystem-level justification.

1. Contradiction regarding the importance of Horn Brook woodland

The report previously described the woodland and scrub along Horn Brook as the most important ecological area.

Yet within the formal habitat evaluation:

- Broadleaved woodland is classified as "Negligible".
- Dense scrub is classified as "Negligible".

At the same time the report admits:

- Horn Brook connects to the wider river network including the River Arun.

- The corridor supports breeding birds, bats, reptiles, otter activity and possible water vole activity.

This is internally inconsistent.

2. Woodland is undervalued because "better woodland exists elsewhere"

The report argues that woodland has negligible importance because higher quality woodland exists elsewhere in the landscape.

This is weak ecological reasoning because it ignores:

- connectivity value,
- stepping-stone habitat,
- riparian linkage,
- urban fringe ecological function,
- cumulative fragmentation effects.

3. River connectivity acknowledged but corridor functionality not assessed

The report explicitly states that Horn Brook connects to the wider riverine network.

Yet there is:

- no ecological network analysis,
- no riparian continuity assessment,
- no aquatic connectivity assessment,
- no movement corridor modelling.

The ecological value of the site appears largely dependent on connectivity, but connectivity itself is barely assessed.

4. The "Negligible" category is excessively broad

The report defines "Negligible" to include:

- species not detected,
- species unlikely,
- or species present but considered insignificant.

This allows uncertainty, low confidence and low abundance to be collapsed into the same category.

5. Desk study data acknowledged as outdated

The report admits that biological records data may now be partially outdated.

Yet the assessment relies heavily on older conclusions and assumptions that conditions remain unchanged despite construction potentially not commencing until 2028.

6. Bat assessment may understate significance

The report records:

- noctule,
- Myotis species,
- serotine,
- Leisler's bat,
- barbastelle.

Barbastelle is particularly light-sensitive and associated with important woodland edge commuting habitat.

Yet bat activity is still assessed as only Local importance.

There is also:

- no lux contour modelling,
- no dark corridor strategy,
- no lighting spill assessment.

7. Bat tree survey admits incomplete coverage

The report states:

"additional suitable trees were present within areas excluded from the ground level tree assessment".

These excluded areas include habitats surrounding Horn Brook. Again, uncertainty is acknowledged but significance minimised.

8. Water vole conclusions are weakly justified

The report acknowledges two possible water vole burrows but concludes water vole importance is negligible.

There is little discussion of:

- metapopulation dynamics,
- recolonisation,
- transient use,
- riparian connectivity.

9. Otter assessment repeats earlier contradictions

The report records:

"Two incidental recordings of otter".

Yet still concludes:

"Otter = Negligible".

This is difficult to reconcile with ecological corridor principles and protected species policy.

10. Cumulative assessment appears under-scoped

The report only considers two nearby developments.

This may underestimate:

- wider Horsham growth pressure,
- cumulative lighting urbanisation,
- ecological fragmentation,
- recreational pressure,
- hydrological impacts.

11. Excessive reliance on "common and widespread" terminology

The report repeatedly minimises habitats and species because they are "common" or "widespread".

However, common habitats can still be ecologically important as:

- corridors,
- buffers,
- stepping stones,
- ecological mosaics.

12. Invasive species acknowledged but not strategically addressed

The report records:

- Himalayan balsam,
- Rhododendron,
- American skunk cabbage.

Yet there is:

- no detailed eradication strategy,
- no riparian biosecurity methodology,
- no long-term management plan.

13. Future baseline assumptions appear optimistic

The report assumes habitats and species conditions will remain

broadly stable until construction in 2028.

This assumption appears designed to reduce the need for repeat surveys.

14. Overall structure appears designed to reduce ecological significance

Throughout the EclA:

- uncertainty is acknowledged,
- incomplete survey access is admitted,
- protected species activity is identified,
- corridor importance is recognised,
- but significance is repeatedly downgraded.

Strongest overall criticism:

The EclA repeatedly acknowledges that the Horn Brook corridor supports multiple protected and priority species groups and functions as part of a wider connected riverine network, yet systematically downgrades habitat and species importance through narrowly framed significance criteria that under-emphasise ecological connectivity, corridor functionality and cumulative urban-edge impacts. This results in an assessment that appears to minimise ecological significance despite acknowledged survey limitations, incomplete habitat access and protected species activity.

Strategic ownership point:

Because the ecological value is heavily concentrated around the Horn Brook corridor, any mitigation dependent upon:

- buffers,
- habitat management,
- lighting control,
- invasive species management,
- monitoring,
- drainage,
- fencing,
- or ecological enhancement

may depend on land outside the developer's control if third-party ownership exists along the corridor.

Kind regards

Telephone:

Email: planning@horsham.gov.uk



**Horsham
District
Council**



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 E
aton