

From: Planning@horsham.gov.uk <Planning@horsham.gov.uk>
Sent: 16 May 2026 16:25:20 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 4:25 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:	SUBJECT: FORMAL OBJECTION ON ENVIRONMENTAL, HYDROLOGICAL, AND BIODIVERSITY GROUNDS

As an immediate riparian neighbour separated from the development site by the adjacent watercourse corridor, I am deeply concerned by the profound technical gaps and inadequacies in the environmental and biodiversity metrics submitted by the applicant.

The application fails to satisfy local policies and national planning frameworks on the following material planning grounds:

1. FAILURE TO ENHANCE THE WATERCOURSE HABITAT (0.00% NET

CHANGE) The applicant's submitted Statutory Biodiversity Metric (v1.0.4)

explicitly identifies an on-site watercourse baseline value of 2.35 biodiversity

units. Crucially, the post-intervention entry remains entirely unchanged at 2.35

units, representing an absolute 0.00% net change. While the developer claims an

overall site net gain by altering terrestrial area habitats elsewhere, they are

delivering zero ecological enhancement to the stream itself. Under the National

Planning Policy Framework (NPPF) and Horsham District Council's

environmental policies, developments must protect and actively enhance

ecological corridors. Treating a high-value, vulnerable stream as a static drainage

boundary completely fails to safeguard its status as an active blue-infrastructure

asset.

2. UNENFORCEABLE 30-YEAR COMMITMENTS VIA A "DRAFT"

FRAMEWORK The validity of the applicant's terrestrial net gain calculations

relies entirely upon securing strict habitat creation, management, and monitoring

protocols for a mandatory, legally binding 30-year period.

However, the applicant

has only provided a "Draft" Habitat Management and Monitoring Plan (HMMP)

prepared by Urban Edge Environmental Consulting (dated April 2026). A local

planning authority cannot grant planning permission based on speculative,

unfinalised management draft terms. Without a completed, legally binding, and

fully costed HMMP tied to a Section 106 agreement or

conservation covenant, the

Council has no legal mechanism to ensure that the promised

habitat outcomes will ever be realised. Consequently, the entire Biodiversity Net Gain submission is soundly compromised.

3. REVERSE SILTATION AND RUNOFF RISKS DURING CONSTRUCTION PHASE The proposed masterplan places housing units and intensive infrastructure directly adjacent to the stream bank. The conversion of approximately 9.24 hectares of agricultural greenfield land into extensive impermeable surfaces will dramatically increase surface water runoff velocities and volumes. The submitted documentation fails to provide a robust, site-specific Construction Environmental Management Plan (CEMP) tailored to this specific watercourse. Siltation and hazardous chemical runoff from heavy construction machinery represent an immediate existential threat to the water quality and riparian habitats of the stream. Any siltation event will smother gravel beds, decimate aquatic macro invertebrates, and actively degrade the stream below its current baseline before any post-development gains can begin.

4. OVER-RELIANCE ON TIME-LIMITED AND SEASONAL SURVEY

DATA The applicant's ecological documentation acknowledges a severe structural limitation: "populations of animals and plants are often transient in nature and a single survey visit can only provide a general indication of species present on site." Given that protected riparian mammals (such as water voles and otters) and key avian species (such as kingfishers) utilise stream corridors transiently depending on seasonal foraging and breeding patterns, a limited or seasonally constricted field survey regime is entirely inadequate. The Council cannot rule out the presence of priority, legally protected species when the applicant's own methodology admits that key ecological variables may have been omitted during data collection.

5. CONCLUSION -The current proposal represents an over-development of the site that isolates and endangers a shared watercourse ecosystem. Because the scheme delivers 0.00% net improvements to the stream, relies on an

unenforceable draft
management framework, and exposes a vital wildlife corridor to
severe runoff and
siltation, I respectfully request that Horsham District Council
refuses this
planning application in its current form. The applicant must be
required to provide
a finalised, legally binding HMMP and a dedicated, enhanced
buffer zone for the
watercourse before this application can be soundly assessed.

Kind regards

Telephone:

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