

From: Planning@horsham.gov.uk <Planning@horsham.gov.uk>

Sent: 01 October 2026 14:51

To: Planning <planning@horsham.gov.uk>

Subject: Comments for Planning Application DC/26/0954

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 01/10/2026 2:50 PM.

Application Summary

Address: Land South of Athelstan Way Horsham West Sussex

Proposal: Residential development for 21 no. 1, 2, 3 and 4 bedroom dwellings with associated parking, hard and soft landscaping at Land South of Athelstan Way, Horsham.

Case Officer: Nicola Pettifer

[Click for further information](#)

Customer Details

Address: c/o 45 Gorings Mead Horsham

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment: - Loss of General Amenity

- Other

- Trees and Landscaping

Comments: The Friends of Chesworth Farm object to this application on the reasons

Loss of General Amenity

Other

Trees and Landscaping

All in relation to this area's position in the rural landscape, a designated Local Wildlife Site, south of Athelstan Way.

We object to this development because:

- It would adversely affect the area's Local Wildlife Site status, biodiversity and recreational value.
- The applicant has not fully considered the impact on the Local Wildlife Site, in particular, the mitigation hierarchy: avoid, minimise, restore, and finally compensate. the size of which will be reduced by the applicant's proposal.
- The proposed development will reduce the size of the Local Wildlife Site, which is contrary to Local Policy Guidance which seeks to retain, enhance and buffer / expand Local Wildlife Sites.
- Horsham District Council have not discharged their legal duty to consider biodiversity when determining planning applications under the strengthened biodiversity duty in the Natural Environment and Rural Communities Act 2006 (as amended by the Environment Act 2021).

For centuries, land south of Athelstan Way, as specified in this application, locally known as "The Triangle", has shared the landscape with the Chesworth Farm estate.

As land use has evolved over the last century, local ownership and boundaries have become more rigid. However, wildlife does not recognise those boundaries and nor do many local people: the Friends of Chesworth Farm find that many visitors refer to The Triangle, Muggeridge Field adjoining it and the bridleway access from Arun Way as one entity, that being "Chesworth Farm".

Local perceptions combined rather appropriately with scientific observations when, in 2021, Chesworth Farm and its environs - including The Triangle site - gained Local Wildlife Site (LWS) status after years of patient recordings of the area's flora and fauna.

According to the Sussex Local Wildlife Site Initiative: "Local Wildlife Sites are recognised and valued by local planning authorities across Sussex and the importance of these sites is recognised in their Local Plans. Local Wildlife Sites are also a 'material consideration' in the determination of planning applications." (1)

The Friends of Chesworth Farm, as the farm site's local volunteer group, believe we are well placed to comment on this application as we find ourselves a focus for many comments from local people about what happens to this site.

Local Wildlife Sites in Planning Context - Horsham District Council's Responsibility

We would like to draw attention to the local planning authorities (LPAs) responsibility with regard to Local Sites as set out by Natural England. We are not convinced that this responsibility has been adequately discharged by Horsham District Council.

The National Planning Policy Framework (NPPF) requires that significant harm to biodiversity should be avoided, and if it cannot be avoided or mitigated, planning permission should be refused.

Local planning authorities (LPAs) should consider:

- the site's ecological or geological value and the significance of likely impacts
- the adequacy of survey information, and of avoidance and mitigation measures
- compliance with legislation, Local Plan policy and national policy

When determining planning applications, LPAs should:

- check whether proposals affect a Local Site
- check whether the applicant has provided current, adequate ecological or geological data at an appropriate level of detail
- consider how proposals avoid, mitigate or compensate for impacts on Local Site interests

- apply BNG requirements where relevant
- make decisions consistent with the Local Plan and the NPPF's requirement to protect and enhance sites of biodiversity or geological value.

LPA's have a legal duty to consider biodiversity when determining planning applications under the strengthened biodiversity duty in the Natural Environment and Rural Communities Act 2006 (as amended by the Environment Act 2021). (2)

Local Wildlife Sites in Planning Context - Applicant's Responsibility

Where development is proposed on or near a Local Site, applicants should:

- at the outset, identify whether the site is already identified as a Local Site
- get up to date boundary, citation information and survey output
- assess likely impacts on the features of interest (biodiversity or geology) using recognised methods
- apply the mitigation hierarchy: avoid, minimise, restore, and finally compensate

We note that the applicant's ecology report refers to Local Policy guidance. In section 4.2.2 on page 16 of the HDC Green Infrastructure Strategy 2024, whose key purpose is to provide planning guidance, it states:

"The key sites that the District Council seek to be retained, enhanced and buffered/expanded in a complementary manner include the following (but not limited to):

- Sites of Special Scientific Interest (SSSI) (with appropriate buffer)
- Local Wildlife Sites (with appropriate buffer)..."

We believe this application appears to be contrary to the Local Policy guidance because it does not "retain, enhance, buffer or expand" the Local Wildlife Site within which it falls. Instead, it proposes to replace a portion of the Local Wildlife Site with a residential development. The "buffer" proposed by the applicant does not protect the Local Wildlife Site but instead marks the boundary of a reduced size Local Wildlife Site contrary to the Local Policy Guidance.

Local Wildlife Site (LWS)

As the application site is within the LWS designation it should not be treated in isolation but with due regard to the rest of the biodiversity and importance of the total LWS including neighbouring properties such as the allotments.

In this regard, the bats that use nearby properties for roosting, breeding and hibernating should be material. As the application's Ecological Appraisal report (3) shows, the site's borders hold a range of species in good numbers. These vulnerable mammals will be using the dense, tree-filled hedges to feed and possibly roost and require direct, connected and open routes for access to the food source.

There are many amphibians that will visit from their prime breeding habitat in the allotments to find overwintering sites in nearby damp hedges. Adult Slow Worms and Grass Snakes are regularly found in the neighbouring habitats (as well as in most areas of the total LWS). Grass Snakes, for example, may forage areas encompassing hundreds of square metres or more in search of food (4). These will clearly encompass The Triangle.

Hedges and mature trees provide resources to the benefit of biodiversity, featuring pollinators and other valued insects. This is particularly true of the mature Pedunculate Oaks on the western boundary. These are the most valuable native trees for insect and bryophyte biodiversity in the UK (5).

The importance of the understory of shrubs and other flowering plants to the area's insect diversity cannot be underestimated. If this area is left to develop and is well managed, it is likely that many species will use this area as feeding sites as well as routes through to other areas of the LWS and adjoining neighbourhood. The loss of hedgerow on-site has likely diminished the capacity for Hazel Dormice habitat, identified previously as ideal, for this vulnerable species.

Connectivity

Connectivity is rightly an important concept today, from linking diverse habitats and allowing wildlife, both flora and fauna, to spread and colonise new areas, to all-important human wellbeing.

In terms of wildlife, most animals will use insect-rich green spaces including dense hedges, tree lines and scattered shrubs to "commute", forage and find new habitats and breeding partners. Thus increasing and spreading biodiversity.

This site falls within an important connecting route from beyond St Leonards Forest to the north, via Hornbrook and Bennetts Field to the allotments beyond. These routes subsequently connect to areas along the Arun as highlighted by the Weald to Waves project. All with the 37 hectares of Chesworth Farm as their central hub. In this regard it is worth seeing the connections as described and highlighted within Horsham's Wilder Horsham District initiative.

Within today's stressful environments there is an increasing need for recreational areas. The routes from the town through to the countryside and to points beyond are critical to our population's wellbeing. To cut short or change the character of these routes, denies our community opportunities for relaxation and recuperation. Green spaces, as is well known, reduce pressure on social and health care.

The national Fields in Trust charity has recently reported that Horsham does not meet the minimum standard of green space provision in its annually published index (6). Loss of any green space may degrade Horsham's position further, but loss of locally protected green space will demonstrate a considerable disregard for the green agenda that this council espouses.

Visitors to Chesworth Farm can top 80,000 per annum (7) and there may be even more who walk from the town boundaries into welcoming countryside. It is the perspective and "green intimacy" of areas such as The Triangle, so close to the urban boundary that is part of this key. The elevation to the land south, beyond The Triangle, with its breathtaking view of the Arun valley, is rightly considered iconic and was key in the rejection of Muggerridge Field for development by the government Planning Inspectorate in January 2012.

Indeed, the applicant's own Landscape and Visual Impact Assessment states "There would be Moderate adverse effects on visual amenity..." from a specific part of the adjacent bridleway (8).

Biodiversity

The Ecological Appraisal report says that the area "is not considered to be a good representation of the wider site" (9) is in our view erroneous. There are plenty of common and uncommon species that use the site. Within the LWS, The Friends of Chesworth Farm have listed well over 1,530 different species over the past years. Some will be regular breeders, migratory, or use the site as a valuable feeding ground.

In terms of overall biodiversity, the LWS area contains a vast list of species both common, uncommon or vulnerable. For example, within the LWS designation up to nine species with protected status have been recorded. In addition, there are almost 30 species with a Biodiversity Action Plan (10) (BAP) that provides a programme designed by Natural England to restore and manage species threatened with extinction. These should be referenced when a development is being considered within, or bordering, the proposed development with the aim of supporting their long-term health.

In addition to the species listed in the Ecological Appraisal report (1) that have statutory cover, there is omission of species that are listed as of conservation concern and at risk of extinction in England. These include, the Brown Hairstreak and Small Heath butterflies, for example. Both of which have been seen in and breed in close proximity to this field. These are just two examples of species that rely on sparse, mixed grassland with rich hedge lines nearby.

The Harvest Mouse is found in the area too, another BAP listed species. The hedges were frequently visited by another red-listed species, the House Sparrow, that had the opportunity to nest in the hedge along the northern boundary. They certainly roosted there regularly in numbers and safety before the removal of the hedge.

[REDACTED]

Hedgehogs (one of the "priority species" in legislation) are seen visiting and nesting in and around the allotments. These are known to travel from nesting shelters up to 10ha in a night back and forth to feed their young. Indeed, it is known that males Hedgehogs, especially, may have a "home range" as large as 21ha used in search of a mate (13). Further, this particular study found the values of wider, more dense hedges when close to open fields were more favourable to the Hedgehog where [REDACTED] were present.

These animals' ability to cross The Triangle may have been curtailed recently by the recent erection of restrictive, builder's fencing but both of these mammals will have used the area as a connecting route for their nightly foraging. It was once an important connection facility, with feeding and meeting opportunities on the way. Sightings of [REDACTED] in this area have been witnessed by walkers and allotment-holders alike.

Future

The current area, without development, potentially offers important benefits: it supports biodiversity, provides opportunities for public wellbeing, sustains the area's popularity and, just as importantly, retains its and the wider area's Local Wildlife Site status. This will all be lost or significantly diminished if this project goes ahead.

Mitigation may be put forward under the suggested Biodiversity Net Gain (BNG) regime. This should be carefully assessed, with the possibility of measuring the BNG from a point in time before original and established habitats, such as the hedge on the northern boundary, were removed by the applicant.

Conclusion

We object to this development because:

- It would adversely affect the area's Local Wildlife Site status, biodiversity and recreational value.
- The applicant has not fully considered the impact on the Local Wildlife Site, in particular, the mitigation hierarchy: avoid, minimise, restore, and finally compensate. the size of which will be reduced by the applicant's proposal.
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- Horsham District Council have not discharged their legal duty to consider biodiversity when determining planning applications under the strengthened biodiversity duty in the Natural Environment and Rural Communities Act 2006 (as amended by the Environment Act 2021).

If, in the event, approval is given, it should follow in detail the ecological guidelines for replacement hedges, grassland areas and the proposed buffer area (14). Plus, careful management for wildlife of the western hedge, beside the bridleway. Future management guidelines for these remedial proposals must be fully funded, implemented and in our view mandated in any approval.

There must also be adequate financial provision to manage any measures implementing BNG for a period of "at least 30 years of post-development habitat management". This is clearly in line with policy HB10 in Horsham Blueprint Business Neighbourhood Plan 2019-2036 (15) where it sets out clear policy on delivering BNG.

If the application goes to full planning committee a representative of the Friends of Chesworth Farm would like to speak on the Friends' behalf.

REFERENCES

(1) <https://lws-sussex.org.uk/sussexLWS.php>

(2) <https://www.gov.uk/government/publications/local-sites-and-nature-conservation/local-sites-and-nature-conservation#how-local-sites-relate-to-government-policy>

(3) Site Ecology report conclusion p.21. Referenced at:
https://iawpa.horsham.gov.uk/PublicAccess_Live/Document/ViewDocument?id=C06BFA3C63904211BC7543C317839DA2

(4) Brown , p. r. 1991.Ecology and vagility of the Grass Snake *Natrix natrix*. PHD thesis. University of Southampton. Accessed at:
<https://eprints.soton.ac.uk/id/eprint/461048/1/344145.pdf>

(5) Alexander, A., Butler, j. and Green, T. (2006) British Wildlife 18(1): 18 - 28.

(6)https://experience.arcgis.com/experience/6227aa657af64a5d96cf3395eb6d1a29#data_s=id%3AdataSource_32-1a0c0146293-layer-10%3A213

(7) Chesworth Farm Management plan 2019-2026.

(8) Executive summary LVIA, referenced at:

https://iawpa.horsham.gov.uk/PublicAccess_Live/Document/ViewDocument?id=C06BFA3C63904211BC7543C317839DA5

(9) Site Ecology report conclusion p.29. Referenced at:

https://iawpa.horsham.gov.uk/PublicAccess_Live/Document/ViewDocument?id=C06BFA3C63904211BC7543C317839DA2

(10) Priority Species under the UK Post-2010 Biodiversity Framework. Access at:

<https://jncc.gov.uk/our-work/uk-bap-priority-species/>

[REDACTED]

(13) Pettett, C. E. 2015. Factors Affecting Hedgehog Distribution and Habitat Selection in Rural Landscapes. A thesis submitted for the degree of Doctor of Philosophy.

University of Oxford. Accessed 27/9/2026 at:

<https://ora.ox.ac.uk/objects/uuid:7f88e459-4d9f-4e1f-ae8e-03f000295bce>

(14) Site Ecology report Section 5.0, et seq. Referenced at:

https://iawpa.horsham.gov.uk/PublicAccess_Live/Document/ViewDocument?id=C06BFA3C63904211BC7543C317839DA2

(15) Horsham Blueprint Business Neighbourhood Plan 2019-2036: page 48. Accessed

29/9/2026 at: [https://horshamblueprint.org/wp-](https://horshamblueprint.org/wp-content/uploads/2023/12/HBBNDP_Referendum_Version_MainPlan_red-2-11.13.51.pdf)

[content/uploads/2023/12/HBBNDP_Referendum_Version_MainPlan_red-2-11.13.51.pdf](https://horshamblueprint.org/wp-content/uploads/2023/12/HBBNDP_Referendum_Version_MainPlan_red-2-11.13.51.pdf)

Kind regards

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