

Horsham District Council  
Planning Services  
Albery House  
Springfield Road  
Horsham  
RH12 2GB



28 September 2026

Dear Sir or Madam,

## **Objection to residential development at land south of Athelstan Way Horsham (ref: DC/26/0954)**

### **Introduction**

I write as a local resident of Gorings Mead and a chartered town planner to object to the proposed development of 21 dwellings on land south of Athelstan Way. My principal concern is the permanent loss of an open component of the wider landscape associated with Chesworth Farm, and the resulting harm to the enjoyment and amenity of people using the Farm and adjoining public routes. I also have concerns about refuse collection and servicing.

### **Landscape setting and public enjoyment**

The application site is privately owned and is not publicly accessible. My objection concerns its contribution to the landscape experienced from surrounding accessible land and routes. A field can contribute to public enjoyment of the countryside without people having a right to enter it. Chesworth Farm is a well-loved green asset in Horsham, and its value is influenced by the site itself but also by the wider landscape setting through which people approach and experience it. The application site is perceived as part of the wider cluster of open fields that contribute to this valued rural landscape.

The public route adjoining the western side of the field provides an important gateway towards Chesworth from Athelstan Way. For people approaching from this part of Horsham, the field helps establish the transition from the residential area into the wider open landscape. Its development would change the character of that approach even if the route itself remains available. This is a functional and perceptual gateway, experienced by highly sensitive receptors. Appendix 1 illustrates this relationship.

The application land, adjoining open fields, allotments, vegetation and public bridleway form a recognisable transition between the town and the countryside. Their landscape relationship extends across ownership boundaries. The application field forms an open part of that transition. Replacing it with houses, gardens, roads, parked vehicles and domestic activity would extend the built edge into the wider open setting and reduce the countryside character experienced alongside the site.

The remaining landscape would not be physically severed, and the existing urban influence of nearby housing must be recognised. Nevertheless, neither point makes the field dispensable. Its contribution depends on its position and relationship to the adjoining fields and route, rather than simply the proportion of the wider landscape that it occupies. The loss would be particularly apparent to people passing immediately alongside it.

The submitted Design, Access & Planning Statement records a rise of approximately five metres across the site (paragraph 2.2). The placement of buildings on this rising ground, together with boundary treatments and any retaining structures, requires careful assessment from the adjoining bridleway and wider accessible viewpoints. The effect on the experience of moving from the residential area towards the open countryside is an important part of that assessment.

### **The Council's landscape and green infrastructure evidence**

The Council's Green Infrastructure Strategy and Guide, January 2024, is the updated strategy in its Local Plan evidence base. Paragraph 1.2.1 (page 4) recognises that green infrastructure includes both private and public spaces and features, including allotments, natural green space, hedgerows, field margins and rights of way. Its assessment of the district (page 37) identifies the existing links from Horsham town to its rural outskirts and recreational areas, including Chesworth Farm, as a strength. This evidence supports assessing the application field alongside the adjoining bridleway and wider network, including its role in the experience of approaching Chesworth.

The Horsham District Landscape Character Assessment, 2003, provides further context. Section 5.3 identifies the distinctive southern landscape backdrop to Horsham. Area 6 is characterised by gently sloping valley sides, a low ridgeline, pasture and allotments, with an abrupt settlement edge in places (page 163 and Figure 7.2). These descriptions support examining the relationship between the town edge and its adjoining open landscape.

The Horsham District Landscape Capacity Assessment, 2014, places the site within Local Landscape Character Area 20, Land to the South of Horsham. Its assessment summary records No/Low capacity for medium- and large-scale housing, recognising the area's attractive landscape qualities, contribution to Horsham's setting and recreational value (page 38). This is an assessment of the wider character area, rather than a definitive capacity assessment of this 21-home proposal. Nevertheless, it provides a clear basis for scrutinising the loss of an open part of that landscape.

These assessments form part of the Council's evidence base rather than development-plan policy. Their findings nevertheless support the importance of landscape setting, openness and connected green infrastructure, and the area's contribution to local landscape character. That evidence informs the application of the local and national policies discussed below.

### **The neighbourhood plan and local policies**

The Horsham Blueprint Business Neighbourhood Plan, made in December 2022, identifies the application site as green infrastructure on its Policies Map. The site therefore falls within the scope of Policy HB10, which seeks the conservation, enhancement and management of mapped green spaces and their connections for the benefit of local people and wildlife. The proposed development must be assessed against that policy, including the site's contribution to the wider green infrastructure network and the landscape setting of Chesworth Farm.

Paragraph 8.3 is particularly pertinent: it recognises that individual spaces can have greater collective value as part of wider chains of green infrastructure. The Council should therefore assess the field's contribution to the wider landscape, rather than consider only its qualities in isolation. Paragraph 8.4 also recognises the recreational importance of these networks. In my view, the proposal would diminish this collective value through the loss of openness and the introduction of built development alongside the public route.

HB10(D) addresses connectivity between wildlife areas and green spaces. The Council should consider the scheme's effect on that connectivity, but my landscape objection does not depend on an unproven claim that an ecological corridor would be severed. HB10(F) supports the Chesworth Farm Management Plan's objectives, including conserving distinctive landscape features and supporting sustainable recreational use. This reinforces the importance of the Farm, without assuming that the private application field falls within its ownership or management boundary.

The adopted Horsham District Planning Framework also provides relevant policies. Policy 25 concerns landscape character and green infrastructure; paragraph 9.14 highlights cumulative small changes and local features. Policy 31(1) resists loss of green infrastructure unless new opportunities mitigate or compensate for the loss and retain the area's ecosystem services. Policy 32(2)–(3) concerns local distinctiveness and integration with surroundings. Policy 33(3), (4) and (6) requires a sympathetic relationship with adjoining landscape, open spaces and routes, respect for setting and green corridors, and retention of important landscape features. I consider that the urbanisation described above conflicts with these requirements. The applicant has not justified how any proposed mitigation would retain the particular landscape and amenity functions lost here.

### **Nature conservation and the scope of Policy 31**

The application site is identified on the Local Plan Proposals Map as a Site of Nature Conservation Importance and therefore benefits from the protection afforded by Policy 31(4). Where development would have a direct or indirect adverse impact on biodiversity sites or features, the policy requires refusal unless the reasons for development clearly outweigh the need to protect the site's value and appropriate mitigation and compensation are provided. The proposal must therefore be assessed against the site's designated nature conservation interest, including the effects of habitat loss and disturbance and its relationship with the surrounding ecological network. The provision of housing does not, in itself, demonstrate that these policy tests have been met.

Policy 31(4)(a)(iii) expressly includes SNCIs within the hierarchy of protected sites. Policy 31(2) also supports the retention and enhancement of significant nature-conservation features and connections between habitats. These requirements reinforce the need to assess the field's contribution to the wider ecological network, alongside its landscape and recreational setting.

NPPF Policy N6(1)(c) provides a corresponding national test for local wildlife sites or equivalent sites identified in the development plan. Such proposals should only be supported where there would be no significant adverse effect on the integrity of the site, or where the benefits of development in the location proposed clearly outweigh the likely impact on the features giving the site its nature-conservation value. The SNCI designation identified above therefore requires an assessment against this test as well as Policy 31(4).

The ecological evidence should identify the habitats and boundary features affected, their relationship to adjoining green infrastructure, and any relevant indirect effects of construction, lighting and occupation. I do not offer an expert ecological assessment or allege particular species impacts without evidence. I ask the Council's ecological adviser to confirm that the necessary surveys and assessment support the conclusions reached, and that any required avoidance, mitigation, compensation and management measures can be secured. A biodiversity metric alone cannot determine compliance with these wider policy requirements.

### **Landscape effects and the adequacy of mitigation**

The applicant's Landscape and Visual Impact Assessment itself identifies a moderate adverse effect on the field's contribution to local rural character. It also identifies moderate adverse visual effects at the north-western corner and along the western edge, associated with the adjoining bridleway. Those findings deserve express weight in the planning balance.

As a local resident who values walking this route, I consider that the moderate adverse assessment understates the harm to the experience of this approach to Chesworth. The open field is an important part of that experience, and its replacement by houses and associated domestic activity would cause a pronounced and permanent change at close range. Table 5.2 records high susceptibility for recreational users at viewpoints 06–08, but assigns low value to those views and medium overall sensitivity. I question whether that low valuation adequately reflects the route's recreational role and the landscape qualities recognised in the Council's evidence and Policy HB10. I ask the Council's landscape adviser to review those judgements.

Even on the applicant's own assessment, the acknowledged moderate adverse effect at viewpoint 06 warrants significant weight.

Limited visibility from the wider landscape does not remove the harm experienced at close range from the adjoining bridleway. The Council should consider the importance of this recreational route, the duration and proximity of views, and the change to the experience of approaching Chesworth. The submitted photographs at viewpoints 06–08 (Appendix B, pages B4–B5) illustrate the relationship between the open field, the rising land and the existing residential edge. Viewpoint 06 looks across the field from its north-western corner; viewpoints 07 and 08 look back towards the town from the southern end and higher ground beyond. I ask that the Council's site assessment consider this sequence of views, finished building levels, seasonal screening and the effects before planting matures.

Planting can soften the appearance of buildings, but cannot recreate the openness and rural setting of current undeveloped land. Screening may itself replace an open outlook with enclosure. Nevertheless, good mitigation must start with a landscape-led masterplan that fully considers the sensitivity of the receiving landscape. Similarly, biodiversity net gain measures do not necessarily compensate for loss of landscape setting or the quality of recreational experience. These effects require a separate judgement, even if the scheme satisfies its biodiversity obligations.

### **National policy and the planning balance**

I recognise the importance of addressing Horsham's housing shortfall and the benefits of 21 homes, including the seven homes identified in the application form as social, affordable or intermediate rent. I also recognise the support available under the August 2026 NPPF. If the land is outside the settlement, Policy S5(1)(j) supports development addressing evidenced unmet need where it is physically well related to an existing settlement and can be accommodated by existing or proposed infrastructure.

NPPF Policy N2(1)(a) requires development proposals to consider the environmental qualities of the land, expressly including landscape character and the natural beauty of the countryside, and to identify opportunities to conserve or enhance those qualities. This applies beyond nationally designated landscapes. Here, the relevant qualities include the open field's relationship with adjoining pasture, the rising landform and the transition from the town into the countryside experienced from the bridleway. Those qualities must be assessed as part of the wider landscape, rather than treating the field as an isolated parcel beside existing housing.

Policy N2(1)(d) seeks the conservation and enhancement of natural features of visual or nature-conservation value where possible, together with landscaping that integrates development into its surroundings. N2(1)(e) seeks multiple benefits from green infrastructure, including recreation, and N2(1)(g) requires appropriate provision for its long-term management. Retaining boundary trees or providing new planting would not, by itself, demonstrate that the proposal conserves the field's open character or its contribution to the enjoyment of the adjoining route.

Policy DP3(1) requires development to respond to the character and features of its site and setting so that it integrates with and enhances its surroundings. DP3(2)(c) addresses connections to high-quality, multifunctional green infrastructure supporting recreation and healthy living, while DP3(2)(g) concerns local identity and sense of place. These provisions reinforce HB10 and the HDPF's landscape and design policies. A scheme can retain a public route yet harm its setting and the experience of using it. The Council must therefore assess the proposed layout and built form against this gateway's landscape function, as well as the quality of the buildings themselves.

Policy DP3(3) requires refusal where conflict with paragraph 1 or relevant principles in paragraph 2 is not clearly justified. It also requires substantial weight to be given to compliance with relevant development-plan policies when assessing design quality. The support for housing in Policies S4 and S5 is expressly subject to a balance against adverse effects assessed under the national decision-making policies. S5(2), in particular, identifies failure to comply with a

national policy requiring refusal in specified circumstances as a situation in which adverse effects are likely to substantially outweigh the benefits. The Council should therefore address the conflicts identified with DP3 and the landscape policies expressly, rather than treating housing need as sufficient justification for the proposal.

The neighbourhood plan remains part of the development plan. Annex A, paragraph 2 of the NPPF requires very limited weight for policies materially inconsistent with its national decision-making policies, but does not reduce the weight of other policies merely because they predate it. HB10's locally specific recognition of green infrastructure should be considered on that basis. I do not rely on the special protection in S6: although the plan was made within five years, paragraph 7.27 confirms that it contains no site allocations.

The reference to HB27 in paragraph 5.10 of the applicant's Design, Access & Planning Statement should also be clarified. HB27 is not included in the neighbourhood plan's AIM 3 list on pages 42–43. A site assessment reference is not an adopted housing allocation, and should not be treated as such.

In my judgement, the permanent erosion of this locally important landscape setting and the adverse effects on the adjoining recreational route warrant significant weight. Taken together, they substantially outweigh the proposal's housing and other benefits when assessed against the national decision-making policies, particularly N2 and DP3. The close relationship to existing housing helps explain the applicant's choice of location, but does not overcome the harm caused by extending development into this sensitive open landscape or demonstrate that the identified policy conflicts are clearly justified.

### **Refuse collection and servicing**

The submitted tracking drawing NJC-001 revision B shows reversing manoeuvres, notwithstanding the statements that vehicles can leave in forward gear. These concerns are informed by the opinion of a transport consultant, whose review raises concerns about the available turning arrangements, the apparent length of reversing and the uncertainty over collection points. The precise reversing distances have not been independently measured for this objection. The concern is whether the whole servicing operation is safe and practical, rather than simply whether a vehicle can ultimately leave facing forwards.

Manual for Streets, paragraph 6.8.8, refers to a recommended maximum reversing distance of 12 metres and recognises that longer distances may be considered where routes are straight and unobstructed. I therefore do not suggest that reversing more than ten metres automatically breaches a mandatory limit. The applicant should demonstrate the actual distances, visibility and clearances and compliance with the requirements agreed by the highway authority and waste collection service.

The application form refers to bins being presented at road frontages or collection points. A coordinated servicing plan should identify those points, the dwellings served, vehicle stopping positions, every reversing movement and its measured length. Tracking should use an agreed collection vehicle and show operation with parking spaces occupied, accounting for pedestrians, vehicle overhangs, landscaping and boundary treatments. Any necessary manoeuvring area must remain available in practice.

Equivalent arrangements should be demonstrated for reasonably foreseeable large delivery and removal vehicles. Where these cannot enter or turn, the alternative stopping and delivery arrangements should be explained. Policy 40 of the HDPF and NPPF TR4 address safe access and servicing; TR6(4) provides for refusal where highway safety effects remain unacceptable after mitigation. Any material layout changes needed to secure safe servicing should be assessed before permission, including their landscape consequences.

## **Requested decision**

I request refusal on landscape and visual grounds, with the servicing and biodiversity matters addressed before determination. The effect on the gateway approach and sensitive users of the public rights of way network is a particular consideration. The central issue is the permanent loss of an undeveloped field that makes a significant contribution to landscape character and to the public enjoyment of the rural qualities of the area, which local people value highly. Retaining access to Chesworth and the adjoining route would not, by itself, preserve the quality of that experience. I ask the Council to address expressly the collective value recognised in neighbourhood plan paragraph 8.3, the applicant's acknowledged local adverse effects and the limitations of the proposed mitigation when reaching its decision.

Yours faithfully,



### Chesworth and its wider landscape setting

