

WARNHAM PARISH COUNCIL CONSULTATION COMMENTS

TO:	Horsham District Council – Planning Dept
SITE ADDRESS:	Land To The North and South of Mercer Road Warnham West Sussex
PROPOSAL:	Redevelopment of the site to provide 304 residential units, parking, a retail unit, public car park, public open space, attenuation basins and landscaping
REFERENCE:	DC/25/0151
RECOMMENDATION:	Objection

We write to formally object to planning application DC/25/0151 for residential development at Mercer Road.

Although this site is outside our parish boundary, its location, scale, and potential cumulative impact raise serious strategic and infrastructure concerns that affect the wider area, including our parish. This objection is grounded in both practical community impacts and non-compliance with the National Planning Policy Framework (NPPF, December 2024).

1. Prematurity and Reliance on an Outdated Policy Framework

This application comes forward at a time when Horsham District Council has been instructed by the Planning Inspector to withdraw its emerging Local Plan due to a failure of the Duty to Cooperate. As a result, any decisions now rely on the Horsham District Planning Framework (HDPF, 2015)—a document that is nearly ten years old and cannot reasonably reflect current housing need, infrastructure capacity, or environmental pressures.

Paragraph 15 of the NPPF states that planning should be “genuinely plan-led, with succinct and up-to-date plans providing a positive vision for the future.” That is not the case here. Approving development of this scale in the absence of a credible, up-to-date strategic framework is a clear breach of both the letter and spirit of national policy.

Furthermore, para 234 warns: “Decision-makers should avoid granting planning permission for substantial development proposals that would pre-determine decisions about the location or scale of growth before the strategy for accommodating it has been properly tested.”

This proposal would effectively leapfrog the proper plan-making process, exploiting a policy vacuum and undermining local accountability. The Council’s fallback to the HDPF 2015 does not provide a sufficient policy context for a development of this nature and scale, and in our view, this alone should be grounds for refusal.

2. Infrastructure Capacity – A System Under Strain

The proposed development significantly exacerbates pressure on local infrastructure:

- Primary and secondary schools in the area are already at or near capacity, with no clear mitigation proposed.
- Road networks, particularly local B-roads and village routes, will face increased traffic volumes from construction and residential use, impacting road safety and air quality.
- Healthcare access remains stretched across the wider area, with increasing difficulty in registering with GPs or securing timely appointments.

Paragraph 122 of the NPPF states: “Planning policies and decisions should support development that makes efficient use of land, taking into account... the availability and capacity of infrastructure and services.”

In this case, infrastructure capacity has not been demonstrated, nor have sufficient commitments been made to expand it.

3. Water Neutrality – Incomplete and Inadequate

This part of West Sussex remains under a water neutrality requirement due to pressure on the Arun Valley catchment. The applicant has failed to demonstrate a clear, deliverable pathway to achieving water neutrality - placing the proposal in conflict with paragraph 165:

“Major developments should incorporate sustainable drainage systems... unless there is clear evidence that this would be inappropriate.”

The absence of detailed mitigation—particularly in relation to off-site infrastructure and reliance on untested offsetting mechanisms—makes the application non-compliant with legal and policy standards.

4. Cross-Boundary Impact – Ignored and Undervalued

Despite proximity to our parish, and likely impact on shared roads, facilities, and services, there has been no effective engagement with our council or others nearby. The NPPF is explicit in paragraphs 25 and 27:

“Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address... including infrastructure.”

This has not occurred. It reflects a wider pattern of inadequate cooperation, echoing the Inspector’s recent findings during the Local Plan Examination.

5. Undermining Neighbourhood Planning

Neighbouring parishes, including ours, are at various stages of updating or adopting Neighbourhood Plans, based on expected policies in the now-withdrawn Local Plan. Allowing this speculative development without a current strategic framework undermines those efforts, directly contradicting paragraph 30 of the NPPF:

“Neighbourhood plans... should not be undermined by decisions taken in advance of, or instead of, new strategic policies.”

Conclusion

In summary, this application:

- Conflicts with multiple key NPPF policies relating to plan-led development, infrastructure, water neutrality, and cross-boundary working.
- Places unsustainable strain on local services with no robust mitigation.
- Risks undermining both the Local Plan process and the community-led Neighbourhood Plans that depend on it.

For these reasons, we respectfully urge Horsham District Council to refuse planning application DC/25/0151.

We would also request to be kept informed of any significant changes to this proposal or its planning status.

ANY RECOMMENDED CONDITIONS:

NAME:

OPTIONAL

DATE:

24th April 2025