

Batcheller Monkhouse



PLANNING STATEMENT

Land to the east of Tilletts Lane
Warnham
West Sussex



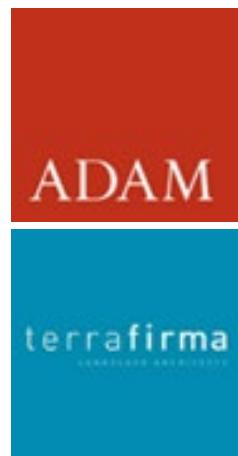
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CONTENTS

1. INTRODUCTION	3
2. THE SITE AND CONTEXT	7
3. PROPOSED DEVELOPMENT	12
4. AFFORDABLE HOUSING STATEMENT	22
4. PLANNING POLICY	28
5. PLANNING APPRAISAL	43
6. SUMMARY	53

Appendix A – Pre-Application Advice dated 17th January 2025



1. INTRODUCTION

1.1 This Planning and Affordable Housing Statement has been prepared in support of a Full Planning Application on land to the east of Tilletts Lane in Warnham.

1.2 The description of development is as follows:

"Erection of 59 dwellings (35% affordable) with associated open space, landscaping, parking, access, and drainage infrastructure"

1.3 The site is allocated for residential development within the Warnham Neighbourhood Plan and the scheme has been subject to public consultation and pre-application discussions with the parish, district and county councils.

1.4 This statement sets out the relevant background to assist Horsham District Council in its determination of the planning application. The statement includes a description of the site and its surroundings, relevant planning history, details of the proposed development, a summary of the planning and heritage policy context, and an appraisal of the scheme against all relevant planning considerations.

1.5 This application is supported by the following documents, reflecting the Horsham District Validation Checklist:

DOCUMENT	PREPARED BY
Application and Ownership Forms	Batcheller Monkhouse
Planning and Affordable Housing Statement	Batcheller Monkhouse
Statement of Community Involvement	Batcheller Monkhouse
Sustainability Statement	Batcheller Monkhouse
Design and Access Statement	Adam Architecture
Heritage Statement	Gingerbread Heritage
Transport Statement	BrightPlan
Extended Phase 1 Ecology Survey Report	AEWC

DOCUMENT	PREPARED BY
Dormouse Survey Report	AEWC
Reptile Survey Report	AEWC
eDNA Survey Results Letters 2024 and 2025	AEWC
Bat Activity Survey Report	AEWC
Biodiversity Net Gain documents	AEWC
Flood Risk Assessment and Drainage Strategy	Motion
Landscape & Visual Appraisal Volumes 1 and 2	Terra firma
Arboricultural Impact Assessment and Preliminary Method Statement	MDJ Arboricultural Consultancy Ltd
Water Neutrality Statement	Motion
Housing Schedule	Adam Architecture
LEMP	Terra firma and AEWC
Air Quality Assessment	Michael Bull & Associates
CIL Forms 1 and 2	Batcheller Monkhouse

DRAWING NO.	TITLE
PL100	Location Plan
PL101	Masterplan
PL102	Plot Plan

PL103	Land Use Plan
PL104	Tenure Plan
PL105	Storey Heights Plan
PL106	Refuse Cycle and Parking
PL107	Movement Hierarchy
PL108	Boundary Treatment Plan
PL109	Roof Plan
PL110	Slab Levels
PL200-204	Apartment Plans
PL205-229	House Type Plans
PL230	Workshop Slate
PL231	Workshop Pantile
PL232-234	Carports
PL235	Double Garage
PL236	Bin Stores
PL300-303	Street Elevations
	Soft Landscape Planting Images
8003	Image Sheet

7001	Landscaping Specification
4001 - 4003	Soft Landscaping
4004 – 4006	Hard Landscaping
5001 – 5002	Cross Sections
1001	Landscape Masterplan
1002	Landscaping Planting Proposals
1003	Planting Schedules
2001PO2 - 2002PO2	Hard Landscape Plans 1 and 2
2003PO2	Details Call Out Plan
2200PO2	Landscape and Utilities Plan
3001PO3 – 3002PO3	Soft Landscape Plans 1 and 2

1.6 The application is made by The Broadbridge Heath Trust which is the landowner. The Trust forms part of the wider Warnham Park Estate which has been owned by the Lucas family since 1865.

2. THE SITE AND CONTEXT

2.1 The application site comprises a 4.25 hectare area of land located to the east of Tilletts Lane in Warnham. The majority of the site comprises two agricultural fields separated by a line of trees and hedgerow. The eastern part of the site is also a vehicular access which currently serves two residential properties and is shared with footpath no. 1430.

2.2 The land is owned by The Broadbridge Heath Trust, except for roadside verges which are owned by West Sussex County Council.

2.3 The site currently has no vehicular access from Tilletts Lane and an informal footpath has been created in the south-western corner.

2.4 The site is bounded on all sides by well-established hedgerows and trees. To the south of the site is the residential area of Freeman Road, Warnham Primary School and a football pitch. To the east are larger residential properties more informally arranged around the village green. To the north are agricultural fields belonging to the applicant, and to the west is Tilletts Lane with land set aside by the Estate from agricultural use and established as a butterfly conservation project.

Figure 2.1 – Aerial photograph of the application site (Base Map: Google Earth)



2.5 The site is located on the northern edge of Warnham which is a village located three miles to the north-west of Horsham. The village sits within a hollow in the landscape and is surrounded by agricultural land and woodland.

2.6 Warnham has a primary school, village hall, church, pubs, dance studio and shops. The village has a wide array of clubs representing the local community, children's play facilities, cricket grounds and tennis courts. There is also a football field owned by the applicant, and village green the ownership of which has been passed from the Estate to the Parish Council.

2.7 Warnham train station, which is part of the London to Brighton mainline, is one mile away to the east of the site. Bus services operate on School Hill and Church Street to the east serving destinations between Horsham and Dorking. Bus stops are all within 400m of the westernmost part of the site.

2.8 **Figure 2.2** shows the defined built up areas and other existing residential areas and facilities, to demonstrate the local context.

Figure 2.2 – Site Context



Heritage Context

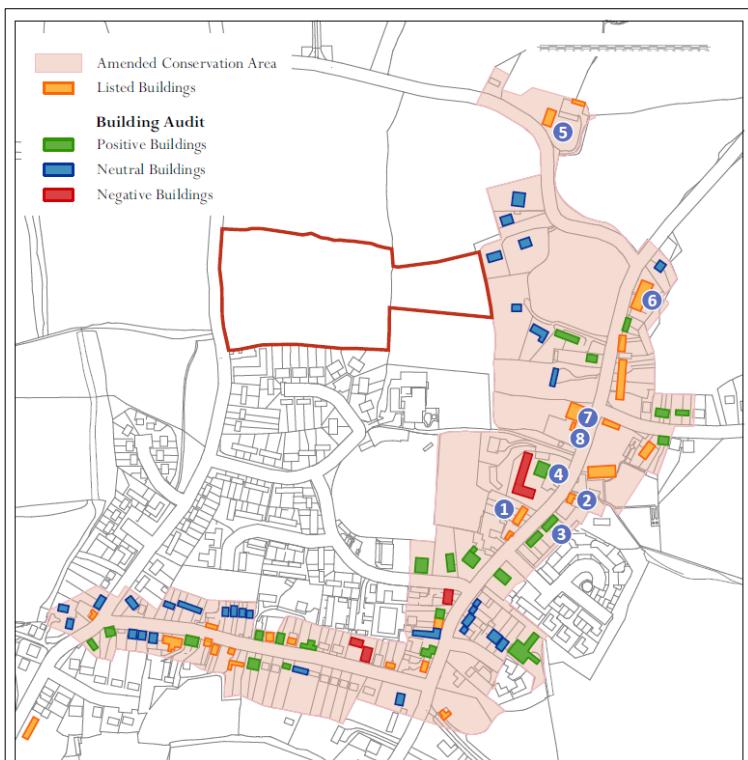
2.9 Warnham is a village located two miles northwest of Horsham, surrounded by agricultural and woodland landscapes. The name "Warnham" is believed to come from a grazing place for wild stallions. The village likely grew in the 12th century as a settlement for farming and swine grazing, with a physical community forming around the local manor.

2.10 The 12th-century village is referenced in historical records, including a tithe in 1166. The church, which dates back to this time, has undergone several changes, notably by Sir Arthur Blomfield in 1885. By the 14th century, Warnham had a significant population, as indicated by its high tax assessment in 1334.

2.11 The development of a new road in 1755 connecting Horsham to Dorking and Epsom led to the construction of 'polite houses' along School Hill. Warnham Court, established in 1829, and the creation of parkland, are important elements of the village's historical context. Further development occurred in the 19th and 20th centuries, including Victorian terraces for brickworks workers, the establishment of Warnham Station in 1867, and housing expansions in the 1920s-1930s and early 2000s.

2.12 The village's historical layers and evolving development contribute to the significance of the Warnham Conservation Area.

Figure 2.3 - Nearby Heritage Assets



Environmental Designations

2.13 The site is located within Flood Zone 1 and therefore has a low risk of flooding in accordance with the Environment Agency's flood maps for planning.

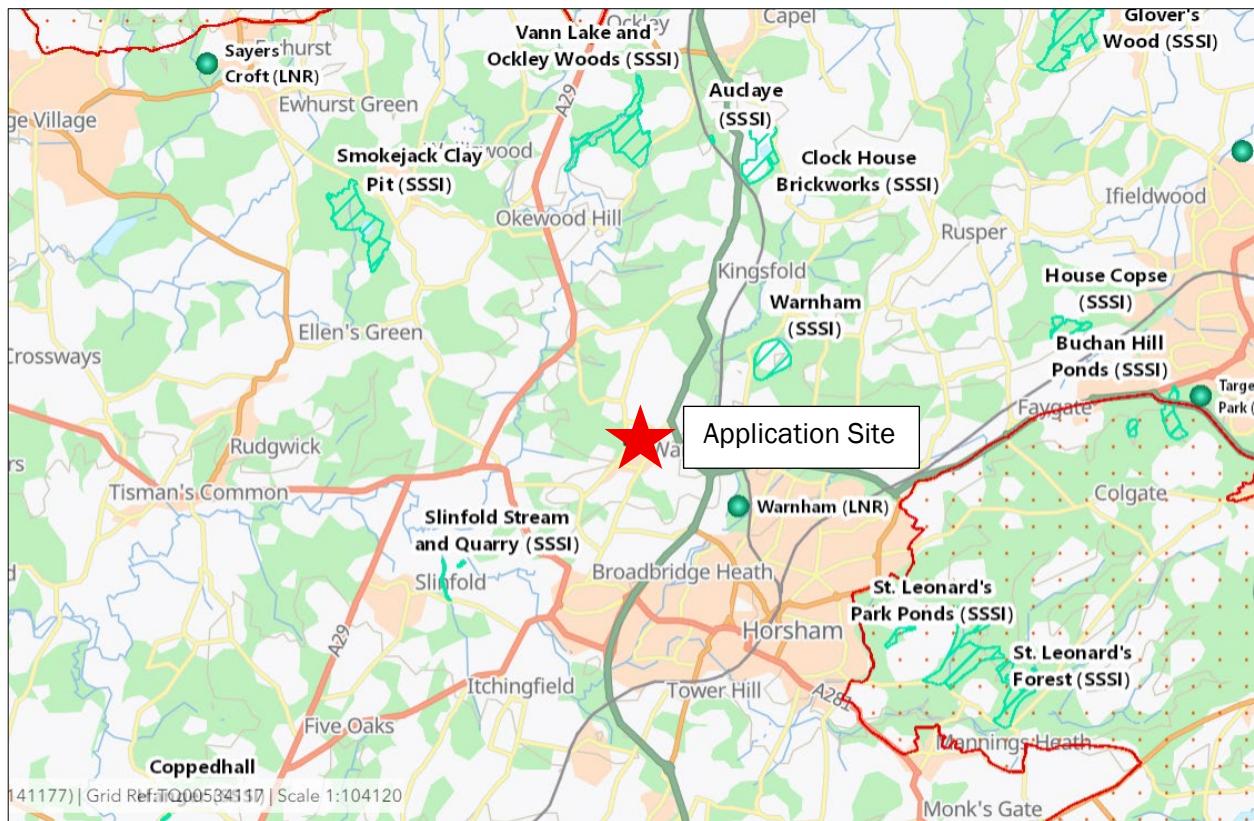
2.14 The site is not located within a designated landscape and the boundaries of the South Downs National Park, High Weald and Surrey Hills National Landscapes are over 4km away.

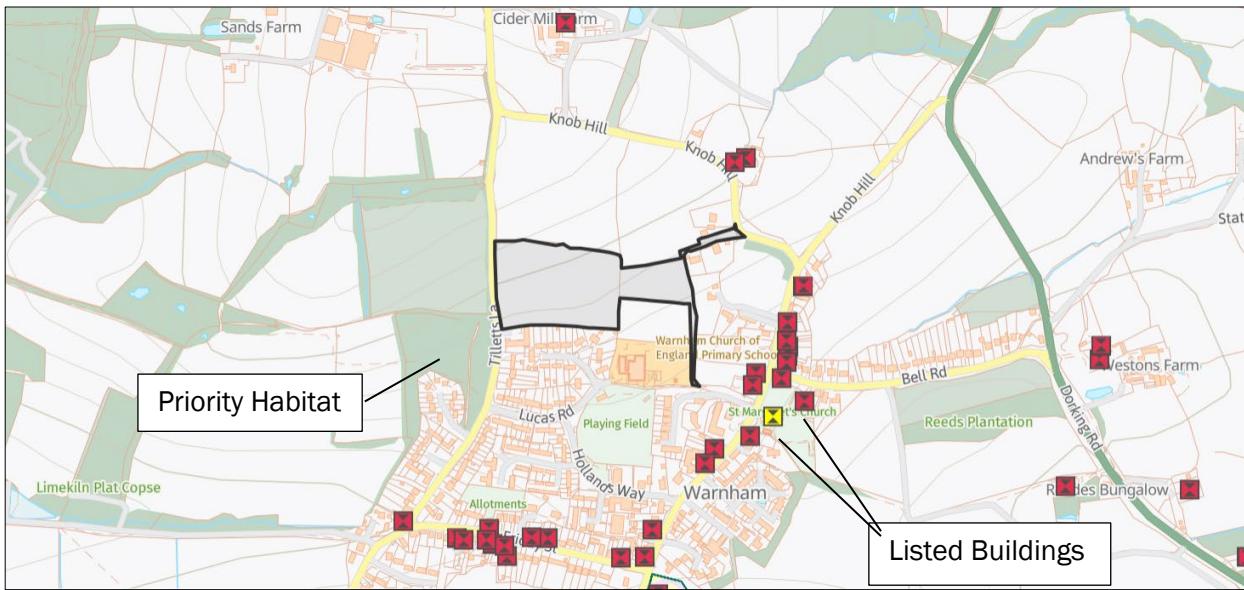
2.15 There is one statutory designated site within 2km of the application site. This is Warnham Local Nature Reserve located 1.3km to the south-east at its closest point. The A24 dual carriageway does however reduce habitat connectivity between it and the application site.

2.16 There are two non-statutory sites located within 2km of the site. These are Benland Wood Local Wildlife Site located 460m to the west, and Warnham Mill Pond Local Wildlife Site located 1.3km to the south-east.

2.17 There are no Habitats of Principal importance on the site but there is deciduous woodland priority habitat to the south-west on the opposite side of Tilletts Lane.

Figure 2.4 – Extract of Natural England's MAGIC mapping software showing statutory designations





Planning History

2.18 A review of the site's planning history has been undertaken using Horsham District Council's public access platform. There is no history for the site.

2.19 The site has been allocated within the made Warnham Neighbourhood Plan for a minimum of 50 dwellings.

3. PROPOSED DEVELOPMENT

Evolution of the scheme

- 3.1 The starting point for the project has been to identify opportunities and constraints to help inform plans for the site. These are detailed within the Design and Access Statement which also explains the evolution of the site layout and various aspects of the scheme.
- 3.2 The Neighbourhood Plan allocation for the site also sets out various requirements which the scheme should deliver. The allocation policy is discussed in section 4 of this report and shown below for ease of reference.

Figure 3.1 – Policy W6 of the Warnham Neighbourhood Plan

Policy W6: North of Freeman Road

1. Development will be supported on approximately 3.55 hectares of Land to the North of Freeman Road subject to **all** of the following criteria being met:
 - a) the provision of a minimum of 50 dwellings;
 - b) the provision of affordable housing which meets the requirements of Horsham District Planning Framework Policy 16, with the expectation that all affordable housing provision shall be made on-site;
 - c) the provision of a range of house types in accordance with Policies W3, W4 and W5 of this plan;
 - d) the provision of accessible public green space within the site commensurate with the scale of development;
 - e) the provision of space within the road system or by means of a car park to permit occasional parking of up to ten vehicles in proximity to the football pitch;
 - f) the provision of appropriate access into the site for vehicles, and segregated access to the site by cyclists and pedestrians from Threestile Road and Church Street;
 - g) the retention and enhancement of trees and hedgerows on the western boundary of the site (except where required to provide access to the site);
 - h) the provision by landscaping of a buffer on the southern edge of the site adjacent to the housing in Freeman Road to minimise visual intrusion to existing properties;
 - i) the provision of a buffer zone to the north of the football pitch to accommodate visitors and spectators to football matches;
 - j) the retention and enhancement of the established hedge along the northern boundary of the site;
 - k) provision for a footpath link to the existing footpath network: paths 1428 and 1429 and 1430, adjacent to the established hedgerows, and Tilletts Lane;
 - l) the provision of a footpath link from the south-west corner of the site to Tilletts Lane; and
 - m) the development shall respect the amenity of neighbouring properties, conserve heritage assets in the Conservation Area and the setting of relevant listed buildings.
2. Proposals for new and improved utilities infrastructure will be encouraged and supported in order to meet the identified needs of the community.

Pre-application discussions

3.3 As explained within the submitted Statement of Community Involvement, the scheme has been subject to various consultations which have informed the proposals. These include a public exhibition, pre-application submissions to Horsham District Council and West Sussex County Council (Highways), and discussions with Warnham Parish Council.

3.4 A summary of the comments received is provided within the Statement of Community Involvement.

Proposed Development

3.5 Full planning permission is sought for the proposed development, the main elements of which are as follows:

- 59 dwellings, of which 35% would be affordable
- 116 on-plot allocated and 31 off-plot unallocated vehicular parking spaces, and cycle parking
- 10 parking spaces for users of the neighbouring football pitch, footpath users and visitors
- 5202sqm of open space spread across 4 areas incorporating a LAP, LEAP and community orchard
- New vehicular and pedestrian access on Tilletts Lane
- Upgraded access on Threestile Road to provide vehicular, pedestrian and cycle access
- New east – west footpath links
- Reconfiguration of the Threestile Road/ Tilletts Lane / Mayes Lane junction
- Carriageway widening to 4.2m in the vicinity of the proposed Tilletts Lane access providing an additional passing opportunity and to accommodate large service vehicles.
- 3 attenuation basins

Housing Mix

3.6 The allocation policy is for a minimum of 50 dwellings. 59 dwellings are proposed which allows for the required housing mix, with a particular focus on 2 and 3 bedroom dwellings which Policy W3 of the Neighbourhood Plan requires, alongside all other policy requirements.

3.7 The density equates to 16.6 dwellings per hectare which is low, however for an edge of rural settlement site is considered appropriate.

3.8 The proposed housing mix is detailed in Table 3.1 below. The affordable housing mix is in accordance with the Council's pre-application advice which required a higher percentage of affordable rented units to be 3 and 3 bed dwellings than originally proposed as the pre-application stage to provide for households who have been waiting for a long time on the housing register.

Table 3.1 – Proposed Market and Affordable Housing Mix

TYPE	MARKET DWELLINGS	AFFORDABLE DWELLINGS	
		Affordable Rented	Shared Ownership/First Homes
1 bedroom	6	4	1
2 bedroom	17	4	2
3 bedroom	11	5	3
4 bedroom	4	2	0
TOTAL	38	15	6

3.9 All homes will be delivered as M4(2) (accessible and adaptable dwellings) and Nationally Described Space Standard compliant. In particular all six ground floor apartments and four dwellings (plots 5, 10, 58 and 59) provide living accommodation and at least one room capable of functioning as a bedroom at ground floor level.

Scale, Density and Appearance

3.10 Proposed buildings are predominantly 2 storey in height with garages and carports being 1-1.5 storey, as shown in Figure 3.1 below. The distribution of building heights has been used to enhance the placemaking of key areas within the site.

Figure 3.1 – Storey Heights Plan



- 3.11 The site density equates to an average of 16 dwellings per hectare which reflects the character of more recent developments on Warnham whilst acknowledging its transitional function on the edge of the village. Variations to the average density across the site correlate with higher density areas along the primary street, with a lower density adjacent to the Conservation Area and open spaces.
- 3.12 To establish a genuine local identity for the development, the dwelling designs draw inspiration from the local vernacular and incorporate high-quality traditional building materials, creating a character that feels familiar and rooted in the area.
- 3.13 The design takes cues from Warnham and nearby towns and villages which feature a rich mix of building types and sizes arranged around streets and open spaces, and are constructed with traditional materials, showcasing elements such as porches, bay windows, and varied architectural details.
- 3.14 The layout of streets and buildings is carefully planned to integrate naturally with the surrounding context, fostering a strong sense of place. Open spaces are interconnected, and the street network is clear and easy to navigate, with a defined hierarchy of street types.

Open Space

3.15 A cornerstone of the play strategy on the Site is the exploitation of all viable open space as an opportunity to play and explore imaginative themes and to encourage interaction, socialising and physical activity. The site wide series of linked green spaces will be designed to include embedded play features and objects that offer 'play on the way', these could include stepping stones, hidden timber forms, iconography and interpretation.

3.16 Formal opportunities for play are provided with a Local Area for Play within the western green and a Local Equipped Area for Play in the southern green.

Landscaping

3.17 The proposals are shaped by a thorough understanding of the broader landscape context and the goals outlined in the Neighbourhood Plan, considering how these elements influence the site in terms of both natural landscape connectivity and human movement. Initial assessments identified opportunities and constraints, focusing on the preservation and enhancement of natural boundary vegetation, determining optimal access points, and addressing key factors like levels and drainage.

3.18 The site benefits from a natural boundary of existing trees and hedgerows, within which the proposed development is structured. This framework helps define a new, natural edge to Warnham. High-quality vegetation will be retained and enhanced as part of a comprehensive landscape and open space strategy.

3.19 A 10m buffer zone with retained trees, hedgerows, and understorey planting will separate the southern boundary from Freeman Road properties, enclosed by a split rail timber fence. The northern boundary will be deepened to strengthen its role as the village edge and a key habitat corridor.

3.20 The development delivers a multifunctional landscape that reflects its edge-of-settlement context and softens the built form through:

- A street pattern shaped by site topography
- Improved public access and connectivity for all residents
- SuDS features like attenuation basins, swales, and rain gardens
- Interlinked public open spaces with species-rich planting to boost biodiversity
- A broad green with meadow planting offering elevated views west along Tilletts Lane
- A linear green with sports pitch views and visitor parking

- Framed outward views over the landscape
- A community orchard
- Formal play areas (LAP and LEAP) and informal natural play opportunities

Figure 3.2 – Landscape Masterplan



Ecological Enhancements

3.21 AEWC Ltd conducted a Preliminary Ecological Appraisal at the Site in April 2024. This has been followed up by further surveys for bats, great crested newts, reptiles, and hazel dormice. Mitigation measures have been devised using the results of the surveys to avoid impacts on protected species and habitats resulting from the development. Furthermore, enhancement measures have been incorporated into the development design to improve the site's biodiversity. These include the creation of areas of high-quality semi-natural habitat, tree planting, and hedgerow enhancement, as well as the provision of bat and swift/bird boxes and log piles and hibernacula for reptiles and amphibians.

Access and Parking

3.22 The primary Threestile Road access utilises the existing access strip, which is owned by the applicant, to the east of the site between the properties Robinsgreen and Lowood. The access strip provides appropriate corridor width (10m+) to provide two-way vehicular access and a footway, which would be an enhancement of PROW 1430.

3.23 The proposed access would take the form of a T-junction with a simple priority arrangement. The access would have a width of 6.0m width, plus 6.0m corner radii to enable two-way movement between cars at the access and to facilitate service vehicle access.

3.24 The secondary access would be served from Tilletts Lane. The existing gate location on Tilletts Lane provides a natural break in boundary vegetation and has an appropriate level difference between the site and road to serve the access. The access is positioned approximately 10.0m to the south of the existing gate to reduce the impacts on adjacent tree root protection areas. The proposed access would take the form of a T-junction with a simple priority arrangement. The access would have a width of 6.0m plus standard 8.0m corner radii to facilitate large service vehicles. Tilletts Lane's carriageway would be widened to 4.2m in the vicinity of the access to accommodate large service vehicle movements as well as enable vehicle passing in the vicinity of the access.

3.25 In relation to pedestrian access it is proposed that the site would be served by four principal routes:

- PROW 1430 and 1429 would have minor alignment changes and be enhanced through widening to 2, and the provision of a metalled surface until its connection with PROW 1429 which is already surfaced. PROW 1430 provides the most direct route to the village centre.
- A footway connection in the south-west corner of the site. A short section of footway would connect with existing footways at the southern end of Tilletts Lane.
- A pedestrian route flanking the Threestile Road vehicle access bearing south linking to the village green will provide additional connectivity to the village centre. This route would tie in with footways and shared surface roads throughout the site.
- The shared surface access on to Tilletts Lane. This would principally serve as a connection for pedestrians wanting to access PROW 1427 to the east and for cyclists cutting through the site. The light baseline traffic conditions and low speeds means that Tilletts Lane would remain appropriate for cycling and occasional walking.

Figure 3.3 – Pedestrian Access Strategy Overview



- 3.26 Car parking would be provided in a mixture of driveways, garages, car ports, parking courts and on-street parking. 116 on-plot allocated and 31 off-plot unallocated vehicular parking spaces will be provided. 10 parking spaces for users of the neighbouring football pitch are also proposed.
- 3.27 Electric vehicle charging points would be provided for all dwellings including the apartments within the communal parking areas.
- 3.28 Cycle parking will be provided within garages, car ports and secure cycle stores across the site.
- 3.29 Off-site improvements are also proposed to the junction of Tilletts Lane, Threestile Road and Mayes Lane which is currently constrained in its geometry, operation and visibility, although there is no evidence of an accident record that would suggest the arrangement presents a highways safety issue. A simple priority working arrangement is proposed with a give-way marking set back 2.7m from its current position. The existing grass splitter island would be removed. This arrangement would provide clear priority to users and improve visibility. It is intended that the developer would make a financial contribution to the implementation of this junction improvement scheme.

Waste and Recycling

3.30 The Applicant liaised with HDC to determine waste and recycling requirements. (1x 140L refuse bin & 1x 240L recycling bin per house, and 1x 1100L refuse bin and 1x 1100L bulk recycling bin for flats based on 180L refuse / 240L recycling per flat). The apartment buildings have dedicated bin store buildings. Market dwellings provide refuse storage within oversized garages (designed to accommodate cycles/bins/cars at the same time) or within lockable structures within carports. Affordable dwellings provide refuse storage within external bin/cycle stores at the rear of properties.

Drainage

3.31 The proposed drainage strategy for the site will incorporate permeable paving and three attenuation basins, with discharge controlled by a vortex flow device into the existing nearby ditch system. This approach is designed to replicate the current hydraulic conditions of the site. The surface water discharge will be limited to no more than the predevelopment greenfield runoff rate. The strategy, including permeable paving and attenuation basins, is capable of managing runoff from a 1 in 100-year rainfall event, including climate change considerations, without causing flooding. There is also enough space on the site to expand the attenuation capacity to account for potential future increases in runoff due to urban development or exceedance flows.

3.32 In addition to flood control, the permeable paving and attenuation basins will help mitigate pollution by addressing the site's highest pollution risks. This ensures that the drainage strategy is suitable for managing site runoff before it discharges into surface waters.

3.33 Furthermore, the drainage design provides additional amenity and biodiversity benefits, fulfilling all four key principles of Sustainable Drainage Systems (SuDS). For the disposal of foul wastewater, gravity will direct flows to an on-site pumping station, from where effluent will be pumped to the off-site Southern Water sewer network in Warnham.

Energy and Sustainability

3.34 The Applicant is committed to delivering a high-quality, sustainable residential development at Tilletts Lane. In response to the global climate emergency, the proposals go beyond individual buildings to focus on the sustainability of the wider neighbourhood. This commitment is structured around four key themes: Energy, Materials, Nature, and Living.

Energy

- All homes will meet high standards of energy efficiency, minimising the need for heating and cooling.
- Low-carbon and renewable energy technologies will be integrated where appropriate.

- Real-time energy use data will be provided to each home.
- Smart energy systems will help reduce energy bills and support lower living costs.

Materials

- The development will prioritise the use of natural, local, and recycled materials with low embodied carbon and environmental impact wherever possible.
- Best-practice waste management will be embedded across the masterplan, design, construction, and operational stages to support net-zero carbon waste goals.

Nature

- The site naturally extends the existing village of Warnham, allowing development to remain contained within the surrounding landscape.
- The proposals will deliver over 10% net biodiversity gain through enhanced habitats, improved ecological connectivity, and integration of wildlife within the built environment.
- Green infrastructure will offer additional benefits such as improved wellbeing, shade, and flood mitigation.
- Sustainable drainage systems will integrate blue and green infrastructure to support biodiversity, habitat creation, and water management.

Living

- A variety of dwelling types, sizes, and tenures will meet local housing needs and promote a diverse, balanced community.
- The masterplan prioritises active travel over car use, encouraging walking and cycling through dedicated routes and strong connections to the wider area.
- The development supports local living and low-carbon lifestyles.
- All homes will be equipped with electric vehicle charging points.
- Water-efficient fittings will be standard in every home.
- Ultrafast broadband will ensure digital connectivity for all residents.

4. AFFORDABLE HOUSING STATEMENT

Policy Requirements

National Planning Policy Framework

4.1 Paragraph 64 of the National Planning Policy Framework confirms that, where a need for affordable housing is identified, planning policies should specify the type of affordable housing required and expect it to be met on-site unless criteria applies. Annex 2 of the NPPF defines the types of affordable housing that are available which comprises:

- a) *Social Rent: meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent; (b) the landlord is a registered provider; and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision.*
- b) *Other affordable housing for rent: meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).*
- c) *Discounted market sales housing: is sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.*
- d) *Other affordable routes to home ownership: is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.*

4.2 Paragraph 66 of the NPPF states that where major development involving the provision of housing is proposed, planning policies and decisions should expect that the mix of affordable housing required meets identified local needs, across Social Rent, other affordable housing for rent and affordable home ownership tenures.

Horsham District Planning Framework

4.3 Policy 16 states that on development sites of 15 or more dwellings, or on sites over 0.5 hectares, 35% affordable housing should be provided on-site.

4.4 The overall housing tenure target is to provide 70% as social/affordable rented properties and 30% as intermediate/shared ownership properties. However, the tenure split on each site will be determined in the light of up-to-date information, particularly on local need and supply.

4.5 Development should provide a mix of housing sizes, types and tenures to meet the needs of the district's communities as evidenced in the latest Strategic Housing Market Assessment ('SHMA') in order to create sustainable and balanced communities. The latest SHMA was published in 2019.

4.6 The appropriate mix of different housing types and sizes for each site will depend upon the established character and density of the neighbourhood and the viability of the scheme.

Horsham Council's Planning Obligations and Affordable Housing Supplementary Planning Document (adopted September 2017)

4.7 The document provides guidance on how Policy 16 of the HDPF will be applied and states that developments are required to provide a mix of affordable housing sizes to meet the needs of the district's communities, as set out in the latest Strategic Housing Market Area Assessment (November 2019). Table 4.1 below demonstrates the need for different sizes of homes in Horsham, as set out in the SHMA.

Table 4.1 – Northern West Sussex SHMA's Strategic Conclusions on the Need for Different Sizes of Homes in the Horsham District

	Affordable Rented	Low Cost Home Ownership	Market Housing
1-bed	35%	25%	5%
2-bed	30%	40%	30%
3-bed	25%	25%	40%
4+ bed	10%	10%	25%

4.8 As set out in Policy 16 of the HDPF, the overall housing target is to provide 70% as social/affordable rented properties and 30% as intermediate/shared ownership properties. The tenure split should aim to meet the Council's assessment of housing need.

Warnham Neighbourhood Plan

4.9 Policy W3 states that a fundamental element of housing provision is the provision of affordable housing to address local needs. The Neighbourhood Plan supports the requirements for affordable housing set out within Policy 16 of the Horsham District Planning Framework.

Proposed Provision

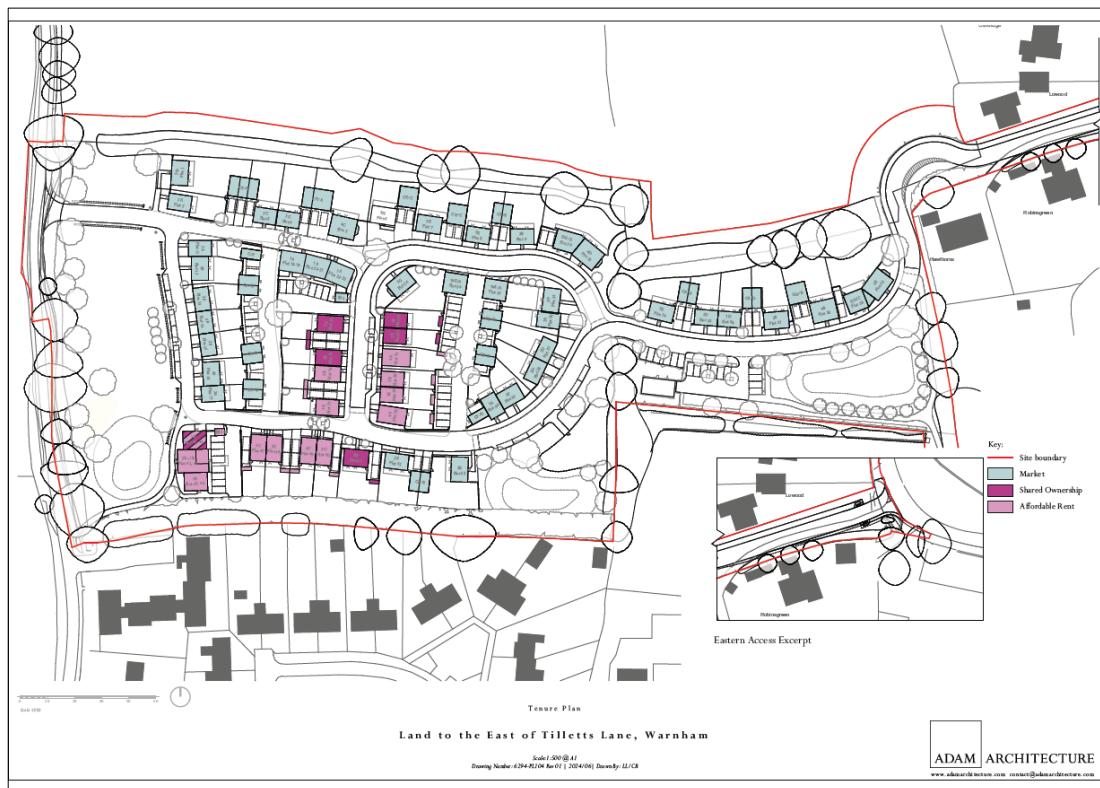
4.10 The affordable housing mix has been informed by both the Northern West Sussex SHMA's identified housing need, and advice received by Horsham District Council Officers as part of the pre-application enquiry. The housing mix was initially based on the SHMA's recommendations, however has been amended to provide a higher percentage of 3 and 4 bed affordable rented units on the advice of Officers. This addresses those households with 3 or 4 bed needs which have had the longest wait on the housing register.

Table 4.2 – Proposed Affordable Housing Mix

AFFORDABLE DWELLINGS				
	Affordable Rented		Shared Ownership/First Homes	
	No. of Units	As percentage of all affordable rented units (Council's required mix provided in brackets)	No. of Units	As percentage of all shared ownership/first homes
1 bed	4	26.6% (27%)	1	16.6%
2 bed	4	26.6% (25%)	2	33.3%
3 bed	5	33.3% (35%)	3	50%
4 bed	2	13.33% (13%)	0	0%
Total	15		6	

- 4.11 Pre-application advice suggested the applicant reaches agreement with a provider as soon as possible to clarify and confirm tenure split and secure funding arrangements, and to ensure the layout and specifications of the affordable units meet provider's requirements. This however has not been possible as the timescales for the determination of the planning application is unknown and therefore providers are not able to commit to the site.
- 4.12 There has also been a recent problem with providers having limited funds to invest in new sites as a result of funds being required to upgrade existing stock. It is anticipated that by the time planning permission is granted and the site is ready to be sold, providers will be operating under a new financial period where budgets will allow for the purchaser of new stock.
- 4.13 It may also be the case that the purchaser of the open market units has an in-house provider, or links to a preferred provider.
- 4.14 The design of the affordable units has in any case been informed by a development consultant to ensure the houses are aligned with provider's requirements.
- 4.15 The affordable units are arranged centrally within the site and along the south-western boundary in a cluster for ease of management.

Figure 4.1 – Arrangement of affordable homes across the site (shaded pink)



4.16 All homes will be delivered as M4(2) (accessible and adaptable dwellings) and Nationally Described Space Standard compliant. In particular all six ground floor apartments and four dwellings (plots 5, 10, 58 and 59) provide living accommodation and at least one room capable of functioning as a bedroom at ground floor level.

4.17 All homes comply with the Nationally Described Space Standard, as follows:

Table 4.3 – Affordable home sizes

PLOT NO.	TENURE	SIZE	GIA (SQM)	SPACE STANDARD (SQM)
24 (house)	Shared Ownership	3 bed (5 person)	94.32	93
25 (house)	Shared Ownership	3 bed (5 person)	94.32	93
26 (house)	Affordable Rent	3 bed (5 person)	94.32	93
27 (house)	Affordable Rent	2 bed (4 person)	80.74	79
28 (house)	Affordable Rent	4 bed (6 person)	108	106
29 (house)	Affordable Rent	2 bed (4 person)	80.74	79
30 (house)	Affordable Rent	2 bed (4 person)	80.74	79
31 (house)	Affordable Rent	4 bed (6 person)	108	106
32 (house)	Shared Ownership	2 bed (4 person)	80.74	79
33 (house)	Shared Ownership	2 bed (4 person)	80.74	79
41 (apartment)	Shared Ownership	1 bed (2 person)	50.17	50
42 (apartment)	Affordable Rent	2 bed (3 person)	61.65	61
43 (apartment)	Affordable Rent	1 bed (2 person)	50.17	50

44 (apartment)	Affordable Rent	1 bed (2 person)	50.17	50
45 (apartment)	Affordable Rent	1 bed (2 person)	50.17	50
46 (apartment)	Affordable Rent	1 bed (2 person)	50.17	50
47 (House)	Affordable Rent	3 bed (5 person)	94.32	93
48 (House)	Affordable Rent	3 bed (5 person)	94.32	93
49 (House)	Affordable Rent	3 bed (5 person)	94.32	93
50 (House)	Affordable Rent	3 bed (5 person)	94.32	93
51 (House)	Shared Ownership	3 bed (5 person)	93.78	93

5 RESPONSE TO PRE-APPLICATION CONSULTATION COMMENTS

5.1 A pre-application submission was made to Horsham District Council in September 2024 and a copy of the Council's advice is provided in Appendix A.

5.2 A summary of the advice received is provided in Table 5.1 below, together with the project team's response.

Table 5.1 – Pre-application advice

COMMENT	RESPONSE
Affordable Housing	
Mix of tenure sizes for the affordable rented units to be amended to provide two fewer 1 and 2 bed units and two additional 3 and 4 bed units.	1 and 2 bed affordable units have been reduced in favour of additional 3 and 4 bed units.
Clarity needed on which affordable units could be suitable for people with mobility problems.	All homes will be delivered as M4(2) (accessible and adaptable dwellings) and Nationally Described Space Standard compliant. In particular all six ground floor apartments and four dwellings (plots 5, 10, 58 and 59) provide living accommodation and at least one room capable of functioning as a bedroom at ground floor level.
Details of a potential affordable housing provider required	This has not been possible as the timescales for the determination of the planning application is unknown and therefore providers are not able to commit to the site. There has also been a recent problem with providers having limited funds to invest in new sites as a result of funds being required to upgrade existing stock. It is anticipated that by the time planning permission is granted and the site is ready to be sold, providers will be operating under a new financial period where budgets will allow for the purchaser of new stock. It may also be the case that the purchaser of the open market units has an in-house provider, or links to a preferred provider. The design of the affordable units has in any case been informed by a development consultant to ensure the houses are aligned with provider's requirements.
Open market housing is fine.	
Layout	
The layout and design are well considered	
The central area with plots 29-41 and 12-38 is considered too dense with an overreliance on parking courts creating large sections of hardstanding. HDC also alludes to some of	The central area has been redesigned and the parking court broken up.

the parking needing to be located closer to homes.	
Gardens for plots 30-35 are too small.	This area has been redesigned and plot sizes increased.
A plan is required showing proposed cycle storage, and waste storage and collection.	Please see drg no. PL106.
Proposed levels plans are required to show relationship between gardens and tall boundaries given the change in levels.	Please see drg no.s PL110, 5001PO2 and 5002.
Design and Access Statement should explain how the design and layout addresses overlooking, light and noise.	The DAS covers these points.
Landscape and Conservation	
The application should include an assessment of the impact within the conservation area setting.	This is provided within the submitted Heritage Statement.
Montage required to show the visual impact of the development when viewing the village from Knob Hill.	These are provided within the Volume 1 of the LVA (see page 26 in particular)
Open Space Plan required	Please see the Landscape Masterplan.
Highways	
Explanation for parking provision in excess of standards should be provided within the application.	The parking provision has been amended to be in line with standards.
Details of cycle parking provision and EV charging spaces should be provided.	Please see Drg No. PL106. Each dwelling will be provided with an EV charging point.
Incorporate raised table crossings at turning heads where there are no shared surfaces to ensure pedestrian prioritisation.	Extent of shared surfacing has been increased and covers all turning heads.
Query regarding a lack of footway or shared surfacing for plots 51-54.	Shared surfacing now extends along the road in front of these plots.
The neighbourhood plan policy requires segregated site access for cyclists and pedestrians from Threestiles Road but this is not shown on the layout plan.	
The application should justify why the footpath links run through the development rather than along the northern boundary.	The layout has adopted an inward facing design approach which helps to make efficient use of the site whilst also creating sizeable areas of open space in appropriate locations. A footpath along the northern boundary would create a corridor that would need to be fenced off from rear gardens. This is undesirable from a security point of view, and would increase activity levels along what is an important wildlife corridor.
The location of the Tilletts Lane access in the NW corner rather than SW corner needs to be justified.	This avoids the need to remove veteran trees which are in the south-western corner, and also preserves the optimum part of the site for an attenuation basin.

Ecology	
The application should be supported by a PEA, GCN surveys and Bat and Bird Scoping Reports.	An extended Phase 1 survey was undertaken which confirmed the need for detailed GCN, bat, dormice and reptile surveys which have been carried out. The Phase 1 survey also considered the impact of the proposals on birds and makes recommendations to ensure they are protected during breeding season. A 10m buffer alongside hedgerows to prevent disturbance to birds that likely utilize this habitat.
12% BNG is required and a metric and statement will be required to support the application.	12% BNG is the requirement in the emerging Local Plan. However, the examining Inspector has recommended the withdrawal of the plan and this is not therefore a policy to which weight can be attached. The mandatory requirement is for 10% BNG. The scheme does in any case achieve 28.83% net gain for habitat units and 14.15% net gain for hedgerow units.
Trees	
A tree survey will be required for all existing trees on site and their condition. This should inform an Arb Assessment to include details of and justification for all trees to be removed, tree protection measures, proposed planting, a shade diagram and RPA plan.	This has been carried out and forms part of the application submission.
Additional tree planting is recommended within the site, along roads and to supplement existing boundary vegetation.	A significant number of trees are proposed throughout the development including along roads and to supplement boundary vegetation – please see the Soft Landscape Plans 1 and 2.
Existing boundary trees and vegetation should be excluded from private gardens with supplementary boundary enhancement planting and a maintenance strip between garden boundaries and the landscape features. Alternatively a TPO could be placed on the northern and southern boundaries.	All existing boundary trees and vegetation have been excluded from gardens. On the southern boundary a 10m buffer is provided between the existing hedgerow and gardens to allow for growth, protection and maintenance. On the northern boundary a similar buffer is provided extending into the field to the north to allow for growth. The applicant would be agreeable to a TPO being imposed on the northern and southern boundaries if felt appropriate.
Query re the gap in the hedgerow boundary between the football pitch and parking area. Is this an existing gap and is it needed for pedestrian access? If access is not needed then consider enhancement planting.	This has been closed off and a native hedgerow will be planted along the boundary between the application site and pitch.
Water Neutrality	
Water Neutrality Statement will be required. The site would qualify for SNOWs but there will be a prioritisation system for access to this.	An application for SNOWs will be made as soon as this is possible.
Flood Risk	
The application should be supported by a FRA and Drainage Strategy which incorporates	This has been submitted.

SuDS and takes account of existing underground services and tree RPAs.	
Detailed comments provided on the SuDS requiring the surface water strategy to be revisited and explaining information required to support the application.	This is addressed within the submitted drainage strategy.
Air Quality Assessment	
An assessment will be required.	An assessment has been carried out. The expected traffic generation is below the thresholds detailed in the EPUK/IAQM guidance and therefore the operational air quality impacts do not require a detailed assessment and the impacts would be expected to be negligible. A damage cost assessment to mitigate emissions supports the application.

6 PLANNING POLICY

6.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that planning applications are determined in accordance with the provisions of the statutory Development Plan unless material considerations indicate otherwise.

6.2 The Development Plan for the site comprises the Horsham District Planning Framework 2015 - 2031 (adopted 2015), and the Warnham Neighbourhood Plan 2017-2031 (made 2019).

6.3 The Council is in the process of reviewing its Local Plan and Examination Hearings were held in late 2024. The Examiner has raised significant concerns about the soundness and legal compliance of the Plan in respect of a number of areas and recommended the plan be withdrawn. As a result limited weight can be attached to the emerging Plan.

6.4 Material considerations include the National Planning Policy Framework (2024), and the following local Supplementary Planning Documents and Guidance:

- Planning Practice Guidance
- Air Quality and Emissions Mitigation Guidance for Sussex (2020)
- Planning Advice Note: Facilitating Appropriate Development (2022)
- Horsham District Council Open Space, Sport & Recreation Review (2021)
- Warnham Parish Design Statement (2007)
- Warnham Conservation Area Appraisal and Management Plan (2020)
- West Sussex Parking Standards

Development Plan

Horsham District Planning Framework

6.5 The Horsham District Planning Framework is now more than 5 years old, however contains a number of development control policies of importance. In particular:

- Policy 16 supports schemes being brought forward through Neighbourhood Plans.
- Policy 16 also requires 35% of dwellings to be affordable on sites of 15+ dwellings.

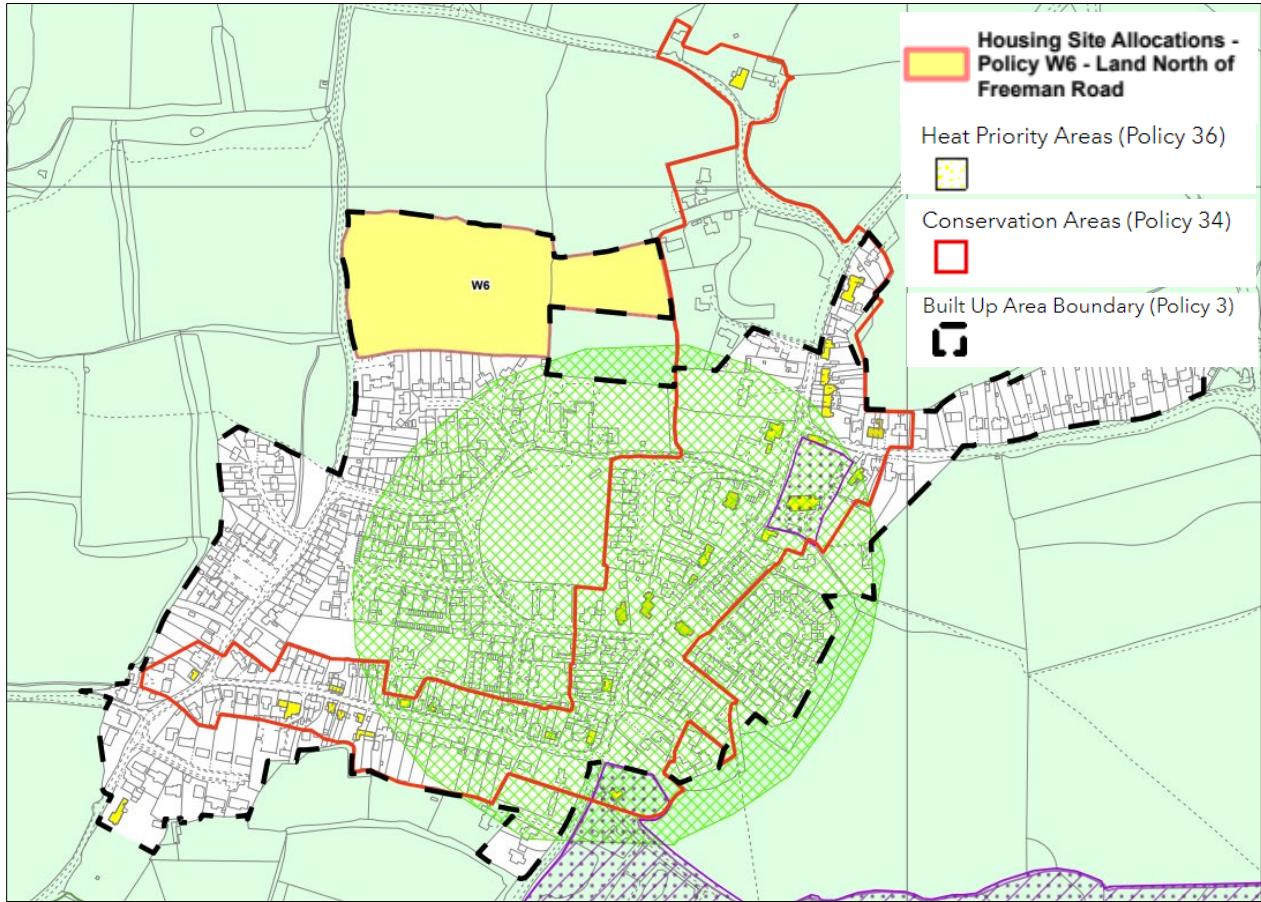
- Policy 25 requires new developments to protect, conserve and enhance landscape and townscape character, taking into account areas identified as being of landscape importance, the individual settlement characteristics, and maintains settlement separation.
- Policies 25 and 31 require new developments to maintain and enhance the Green Infrastructure Network and the existing network of geological sites and biodiversity.
- Policy 32 requires high quality and inclusive design for all new development based on a clear understand of the local, physical, social, economic, environmental and policy context.
- Policy 33 sets out development principles in order to conserve and enhance the natural and built environment. These include making efficient use of land, avoiding unacceptable harm to neighbouring amenity, ensuring a high standard of design and layout which relates sympathetically with the built and natural surroundings, and using high standards of materials, finishes and landscaping. Developments should be locally distinctive and take into account relevant Design Statements and Character Assessments. Existing important landscape and natural features should be retained. Layouts should maximise solar gain and incorporate convenient, safe and visually attractive areas for parking and bin storage. Measures to reduce opportunities for crime should be taken and there should be a clear distinction between public and private spaces.
- Policy 34 requires development affecting heritage assets to reinforce the special character of the historic environment, make a positive contribution to the character and distinctiveness of the area, and retain and improve the setting of heritage assets.
- Policy 35 requires development to make a clear contribution to mitigating and adapting to the impacts of climate change and to meeting the district's carbon reduction targets.
- Policy 36 requires development to contribute to clean, efficient energy.
- Policy 37 requires proposals to deliver sustainable design, including maximising energy efficiency, limiting water usage, encourage the use of natural lighting and ventilation and incorporating measures which enhance the biodiversity value of development.
- Policy 38 requires proposals to incorporate the use of sustainable drainage systems, or water management measures, where there is potential to increase flood risk.
- Policy 39 states that the release of land for development will be dependent on there being sufficient capacity in the existing local infrastructure to meet the additional requirements arising from new development, or suitable mitigation arrangements for the improvement of the infrastructure, services and community facilities caused by the development being provided. Where there is a need

for extra capacity, this will need to be provided in time to serve the development or by a relevant phase of the development.

- Policy 40 encourages development proposals which promote an improved and integrated transport network, with a re-balancing in favour of non-car modes as a means of access to jobs, homes, services and facilities, will be encouraged
- Policy 41 requires adequate parking and facilities to be provided within developments to meet the needs of anticipated users

- 6.6 In addition, Strategic Policy 1 reflects the presumption in favour of sustainable development set out within the National Planning Policy Framework.
- 6.7 Strategic Policy 2 sets out the District's spatial strategy which seeks to focus development in and around the key settlement of Horsham and allow for growth in the rest of the district in accordance with the identified settlement hierarchy set out within Strategic Policy 3. Strategic Policy 3 grades Warnham as a 'medium village' offering a moderate level of services, facilities and community networks, together with some access to public transport.
- 6.8 The accompanying policies map confirms the site is subject to a Neighbourhood Plan allocation and abuts the Warnham Conservation Area.

Figure 4.1 – HDPF Policies Map (site shaded yellow)



Warnham Neighbourhood Plan

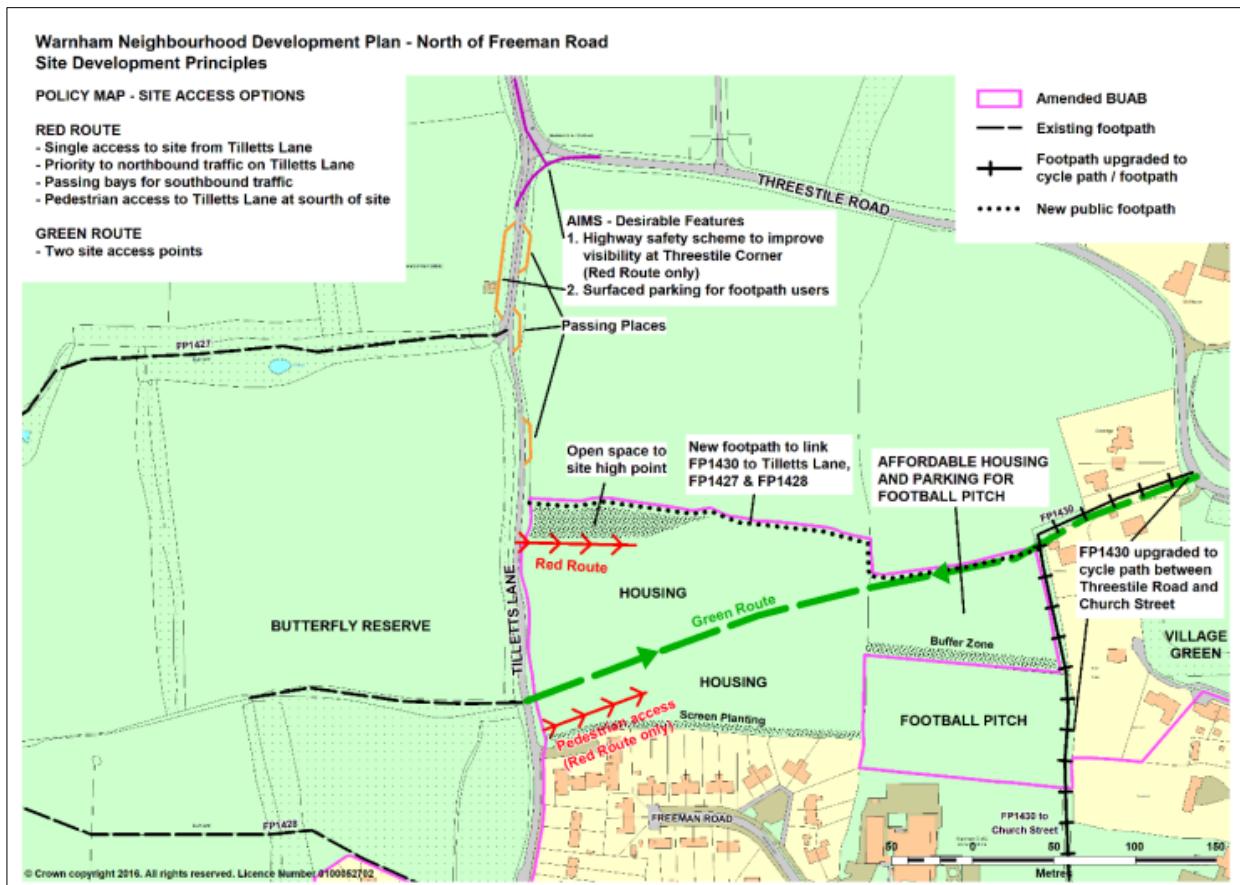
6.9 Policy W6 of the Neighbourhood Plan is the principal Development Plan policy against which the site should be considered. The policy allocates the site for a minimum of 50 dwellings and sets out the following criteria against which a scheme will be assessed:

- a) the provision of a minimum of 50 dwellings;
- b) the provision of affordable housing which meets the requirements of HDPF Policy 16;
- c) the provision of a range of house types in accordance with Policies W3, W4 and W5 of the Neighbourhood Plan;
- d) the provision of accessible public green space within the site commensurate with the scale of development;
- e) the provision of space within the road system or by means of a car park to permit occasional parking of up to ten vehicles in proximity to the football pitch;

- f) the provision of appropriate access into the site for vehicles, and segregated access to the site by cyclists and pedestrians from Threestile Road and Church Street;
- g) the retention and enhancement of trees and hedgerows on the western boundary of the site (except where required to provide access to the site);
- h) the provision by landscaping of a buffer on the southern edge of the site adjacent to the housing in Freeman Road to minimise visual intrusion to existing properties;
- i) the provision of a buffer zone to the north of the football pitch to accommodate visitors and spectators to football matches;
- j) the retention and enhancement of the established hedge along the northern boundary of the site;
- k) provision for a footpath link to the existing footpath network: paths 1428 and 1429 and 1430, adjacent to the established hedgerows, and Tilletts Lane;
- l) the provision of a footpath link from the south-west corner of the site to Tilletts Lane; and
- m) the development shall respect the amenity of neighbouring properties, conserve heritage assets in the Conservation Area and the setting of relevant listed buildings.

- 6.10 Proposals for new and improved utilities infrastructure will be encouraged and supported in order to meet the identified needs of the community.
- 6.11 The accompanying text refers to two desired infrastructure improvements in the immediate vicinity of the site. These include improvements to the junction of Tilletts Lane and Threestile Road (north-west of the site) to improve visibility, and the resurfacing of a currently-informal parking space on Tilletts Lane near footpath no. 1427.
- 6.12 Site development principles are illustrated on the plan below and include access options, footpath and junction improvements and layout considerations.

Figure 4.2 – Warnham Neighbourhood Plan – Site Development Principles



6.13 Policy W1 requires new development to be focused within the Built-Up Area Boundary.

6.14 Policy W2 requires a minimum of 50 new residential dwellings to be provided within the parish up to 2031.

6.15 Policy W3 sets out the expected housing mix for sites in Warnham to ensure new provision contributes towards meeting the identified housing needs of the Warnham parish. This requires 15-20% to be 1 bed dwellings, 40-45% to be 2 bed, 35-40% to be 3 bed and 5-10% to be 4+ bed dwellings. An alternative mix will only be permitted where new evidence demonstrates a need.

6.16 Policy W4 provides support for developments that provide 25% of dwellings to Lifetime Homes standards. The Lifetime Home standard has however now been replaced by the optional building regulations M4(2) entitled 'accessible and adaptable dwellings'.

6.17 Policy W5 sets out design requirements for residential developments. Such developments should consider the surroundings, neighbouring amenity, design, and the protection of priority habitats. Residential developments should also meet prescribed criteria relating to parking provisions, boundary treatment, the protection of heritage assets, good pedestrian and cycle connections to facilities, refuse facilities, maximum heights of buildings, and vehicular and pedestrian safety. Developments should also contain a proportion of single storey dwellings.

6.18 Policy W9 requires the minimum number of car parking spaces to be provided for all new residential developments, in accordance with the West Sussex Residential Parking Demand Calculator. Parking for visitors, service vehicles and cycles should also be provided.

Material Considerations

National Planning Policy Framework

6.19 The NPPF (2024) sets out the three dimensions to sustainable development: economic, social and environmental within **Paragraph 8**. These dimensions give rise to the need for the planning system to perform a number of roles, namely:

- an economic role – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time;
- a social role – supporting strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- an environmental role – to contribute to protecting and enhancing our natural, built and historic environment, including make effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change.

6.20 At the heart of the Framework is a presumption in favour of sustainable development. Paragraph 11c confirms that for decision taking this means approving development proposals that accord with the development plan without delay. However, Paragraph 11d states that where there are no relevant development plan policies, or the policies most important for determining the application are out of date, permission should be granted unless policies in the NPPF that protect areas or assets of particular importance provides a strong reason for refusing the development proposed, or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination .

Horsham District Council Open Space, Sport & Recreation Review (2021)

6.21 The documents provides a review of existing open space provision within the district. It is used to help inform direction on the future provision of accessible, high quality, sustainable provision for open spaces in Horsham District. It also established provision standards.

6.22 Within Warnham existing provision equates to 23.9sqm per resident for parks and gardens which is in excess of the quantity standard. Current provision of amenity greenspace and Multi-Functional Green Space is 4sqm per resident and 28sqm per resident respectively which is less than the recommended standard of 5.8sqm and 43.9sqm

6.23 The document suggests that for housing schemes of more than 20 dwellings but less than 285 dwellings a minimum of 0.2 hectares of multi-functional greenspace should be provided on-site. A minimum of 0.01 hectares of on-site play provision for children and young people should also be provided on-site. The document also sets out financial contributions which can be made in lieu of on-site provision.

Warnham Parish Design Statement

6.24 The Warnham Parish Design Statement has been adopted as a Supplementary Planning Document. The Statement emphasis the need for care in planning, layout, design and landscaping to ensure that new development sits well within the existing topography and is compatible with its neighbours.

6.25 The document provides guidance for new developments and details characteristics of the parish which are valued:

Figure 4.3 – Valued Aspects of the Parish

Parish characteristic	Design Guideline reference
Valued aspects	
Natural Environment <ul style="list-style-type: none"> The substantially unspoilt nature of the parish Maintenance of the integrity of the traditional boundaries Landscapes – views, vistas and local treatments Predominantly rural approach lanes; separation from the main roads by rural lanes Existence of public open space, greenery, woods and fields, farmland, parkland Easy access to footpaths and bridleways Flora and fauna 	2.2 3.1 7.6 4.1, 4.2, 4.3 5.2 4.3
Built Environment <ul style="list-style-type: none"> Listed buildings, Conservation Area and groups of historic buildings Avoidance of ribbon development along lanes in recent developments Maintenance of physical separation between village and hamlets The traditional nature of the village with church, shops, school, open space, public houses, and village hall Shopping facilities without a formal shopping parade Variety, individuality and diverse nature of architecture, housing, gardens and boundaries Use of local materials and design features Restricted height of buildings Good examples of features such as windows, doors, lintels and chimneys Absence of formal urban traffic devices such as formalised pedestrian crossings and traffic lights Allotments 	1.1, 1.2 2.2 2.2 2.1 3.2, 3.3, 3.6, 6.1, 6.2, 6.3 6.2, 7.1, 7.4, 8.1, 8.2 6.4 7.3, 7.4 9.6 4.1
Planning safeguards <ul style="list-style-type: none"> Future housing locations limited by HDC planning policy to within the current boundaries of the built-up area The parish safeguarded from major development until 2018 by HDC policy 	

6.26 The document also lists features of the parish which are undesirable:

Figure 4.4 – Threats and concerns

Parish characteristic	Design Guideline reference
Threats and concerns	
Built environment <ul style="list-style-type: none"> Urbanisation and over-development of the built environment Inappropriate design, materials and features in alterations and developments Inappropriate dormer windows on street frontages Intrusive modern construction techniques Eco pressures: solar panels and wind turbines Overhead cables Prominent satellite dishes Waste bins on view from road Lack of pedestrian routes within the built areas High fencing adjacent to footpaths Parking in front gardens Excessive use of tarmac Traffic Traffic from new housing adding to the existing road network Road improvements and repair urbanising the street scene Obtrusive communications masts Unmaintained open space 	2.1, 3.4, 3.6, 6.1 3.2, 6.5, 7.6, 8.3, 8.4 7.1 3.2, 6.3, 9.2 10.2 10.1 1.2 7.5 5.1, 5.2, 5.3, 5.4 7.2 3.7, 3.8 8.5, 8.6 3.5 9.1, 9.2, 9.3, 9.4, 9.5, 9.6 10.3 4.4
Other influences <ul style="list-style-type: none"> Planned government relaxation of planning laws Large-scale developments in neighbouring areas generating adverse local traffic effects Changes in agriculture 	
Future Considerations <ul style="list-style-type: none"> The introduction of contemporary architecture to the parish 	6.3

Warnham Conservation Area Appraisal and Management Plan (September 2020)

6.27 The document refers to the eastern part of the site and adjacent northern areas as forming part of the landscape fringe, defining it as 'Fringe 3'. Fringe 3 plays a key role in the rural setting of the Conservation Area. It is described as tranquil with some level of intrusion associated with traffic and aircraft noise.

6.28 The document states that it is essential that any development preserves or enhances the setting of any adjacent historic buildings and existing landscape features and trees, and the overall special qualities of the character area. Careful consideration must be given to the size, scale, urban grain, layout, design, massing, height, plot width, frontage activity, landscape and materials in any such development.

West Sussex Parking Standards

6.29 The parking standards would require 147 car parking spaces, comprising 116 allocated spaces and 31 unallocated spaces. All dwellings should be provided with an electric charging facility.

6.30 The standards also require a total of 68.5 (69) cycle parking spaces across the development.

Air Quality and Emissions Mitigation Guidance for Sussex (2020)

6.31 The document provides a screening checklist to determine whether a proposed development requires an air quality assessment or emissions mitigation assessment. Horsham District Council advised in its pre-application that an Air Quality Assessment would be required, however this has been commissioned and the development has been assessed as falling below the threshold above which a detailed assessment would otherwise be required.

Planning Advice Note: Facilitating Appropriate Development (2022)

6.32 This document was prepared by the Council to address its housing land supply shortfall and to provide guidance to applicants as to the criteria against which speculative housing applications will be considered.

7 PLANNING APPRAISAL

7.1 The issues of relevance in the determination of the application are considered to be as follows:

- Principle of the proposed development
- Compliance with Neighbourhood Plan Policy W6
- Housing mix and tenure
- Layout and design
- Ecology
- Conservation Area & Heritage
- Landscape
- Access and parking
- Neighbouring Amenity
- Flood risk and drainage
- Arboriculture
- Open space
- Water neutrality

7.2 These matters are considered in detail below.

Principle of the proposed development

7.3 The site is allocated for housing in the made Warnham Neighbourhood Plan under Policy W6. The principle of residential development on the site has therefore already been considered and found to be acceptable.

Compliance with Policy W6

7.4 Policy W6 supports development on the site, referred to in the Neighbourhood Plan as 'North of Freeman Road', subject to prescribed criteria being met. The scheme's compliance with the criteria is discussed against each below. It is also important to note that whilst the Neighbourhood Plan refers to the site as being 3.55 hectares, the application site includes additional areas for public footpath and biodiversity improvements which have increased the size of the site to 4.25 hectares.

1.

- a) *The provision of a minimum of 50 dwellings;*

The scheme is for 59 dwellings which is considered appropriate taking into account prevailing densities; and the need to provide appropriate open space and parking provision, and space within the site for landscaping and drainage features.

- b) *The provision of affordable housing which meets the requirements of Horsham District Planning Framework Policy 16, with the expectation that all affordable housing provision shall be made on-site;*

35% affordable housing is proposed in accordance with HDPF Policy 16. All affordable housing is provided on-site.

- c) *The provision of a range of house types in accordance with Policies W3, W4 and W5 of this plan;*

The proposed housing mix is broadly in line with the requirements of Policy W3. The housing mix has however been adjusted to include 4 bed affordable dwellings to address the needs of those households which have been on the housing register the longest. 18.64% of all dwellings will be 1 bed (in line with the required 15-20%), 38.98% will be 2 bed (in comparison with the required 40-45%), 32% will be 3 bed (in comparison with the required 35-40%) and 10% will be 4 bed (in comparison with the required 5-10%).

Policy W4 requires dwellings to provide for the needs of older people and requires 25% of dwellings to be built to Lifetime Homes Standards. The Lifetime Home standard has now been replaced by the optional building regulations M4(2). All dwellings will be delivered as M4(2) and Nationally Space Standard compliant.

Policy W5 relates to the design of residential development and requires the scale and character to respect the landscape and its features, valued views into and out of the settlement, the local streetscape and heritage assets. The scale and character of the proposals are designed to be low-2 storey development, which is visually contained by the landscape. Development arrangement seeks to replicate identified patterns within the Warnham streetscape. Heritage assets are respected through lower densities near the Conservation Area, and contextually appropriate architectural styles.

Policy W5 requires existing residents' privacy, light and visibility to be protected. Existing hedgerows are being retained with 10m protected buffers with gardens beyond. Lower densities are proposed closer to the Conservation Area.

Policy W5 also requires high quality design. The applicant commissioned the Warnham Pattern Book in 2021 which researches how the village has grown and identifies local building traditions, styles, materials, densities, typologies and place making principles. The proposals rely heavily on this research to ensure proposals are sympathetic and contextually appropriate in scale

Lastly, Policy W5 seeks the protection and preservation of priority habitats. AEW have been conducting ecological surveys of the site for over a year and have devised mitigation and enhancement measures to avoid impacts on protected species and habitats. This has resulted in proposals for high-quality, semi-natural habitat, tree planting and hedgerow enhancement, bat and bird boxes, log piles and hibernacula.

- d) the provision of accessible public green space within the site commensurate with the scale;*

The scheme delivers over 5 hectares of public green space across four areas featuring a LAP (169sqm), LEAP (400sqm), orchard and informal green space. These have been scaled to comply with the requirements of Horsham District Council's Open Space, Sport and Recreation Review (June 2021).

- e) the provision of space within the road system or by means of a car park to permit occasional parking of up to ten vehicles in proximity to the football pitch;*

Ten parking spaces are provided next to the football pitch for pitch users.

- f) the provision of appropriate access into the site for vehicles, and segregated access to the site by cyclists and pedestrians from Threestile Road and Church Street;*

The access strategy has been informed through pre-application discussions with the Highways Authority. Two access points are proposed with one on Tilletts Lane serving approximately one-third of the houses and one on Threestile Road serving the remainder. This avoids the need to significantly alter Tilletts Lane which would otherwise have required widening with a resultant loss of important trees, wildlife corridor and the rural character of the lane.

Segregated pedestrian access has been provided via an upgraded Footpath 1430 at Threestile Road and Church Street. The south-west corner of the site provides an additional stepped pedestrian access onto Tilletts Lane.

It has not been possible to provide an appropriately engineered segregated cycle route through the site as Footpath 1430 is not wide enough and tree RPAs need to be avoided. The east and west parts of the site will be permeable to cyclists and pedestrians, whilst not to vehicles.

- g) the retention and enhancement of trees and hedgerows on the western boundary of the site (except where required to provide access to the site);*

The access on Tilletts Lane requires the removal of some trees and hedgerow, however it has been positioned to avoid harming the highest quality trees. Hedgerows and trees on the northern and southern boundaries are to be retained and a 10m buffer provided to allow the hedgerows to grow and to protect them as wildlife corridors.

- h) *the provision by landscaping of a buffer on the southern edge of the site adjacent to the housing in Freeman Road to minimise visual intrusion to existing properties;*

A 10m buffer has been provided alongside the existing hedgerow which forms the southern boundary.

- i) *the provision of a buffer zone to the north of the football pitch to accommodate visitors and spectators to football matches;*

A buffer zone north of the football pitch has been provided alongside the proposed parking area for the pitch.

- j) *the retention and enhancement of the established hedge along the northern boundary of the site;*

The northern boundary hedgerow will be retained and a 10m buffer is to be provided extending into the field to the north to encourage growth and protect it as a wildlife corridor.

- k) *provision for a footpath link to the existing footpath network: paths 1428 and 1429 and 1430, adjacent to the established hedgerows, and Tilletts Lane;*

A footpath and cycle link has been provided through the site linking path 1430 with Tilletts Lane from where 1427 and 1428 can be accessed. The new path cannot run adjacent to the hedgerows running along the northern boundary as anticipated in the Neighbourhood Plan. Such an alignment would result in a long path running along the backs of houses which be undesirable from a safety perspective. It would also mean the easternmost part of the site could not also accommodate houses due to the need to provide a 30m buffer between them and the football pitch.

Instead a foot/cycle path is provided through the development from Threestile Road to the south-western corner of the site where it connects in to Tilletts Lane.

PROW 1430 would be upgraded with new surfacing and lighting to enable all year round usage of the provision of a footpath link from the south-west corner of the site to Tilletts Lane; and

This is being provided. Due to the change in levels between the site and road and the desire to avoid removing trees, this will feature steps.

- l) *the development shall respect the amenity of neighbouring properties, conserve heritage assets in the Conservation Area and the setting of relevant listed buildings.*

The proposals make every attempt to respect neighbouring development possible. It further respects the Conservation Area and the setting by: providing a lower density development near this area; designing architecture in appropriately sympathetic and contextual styles; and retaining and reinforcing existing hedgerow and tree boundary treatments in the area.

2.

Proposals for new and improved utilities infrastructure will be encouraged and supported in order to meet the identified needs of the community.

The site will be delivered with connectivity to fibre broadband.

A management company will be put in place to manage the on-site open space and ensure nearby ditches are cleared. It is understood that there is currently a shared responsibility for the clearance of ditches running alongside FP1430 which has not been effective historically. The applicant is exploring how responsibility for ditch clearance can be taken on by the management company which will be of wider community benefit.

Housing Mix and Tenure

7.5 Policy W3 of the Neighbourhood Plan recommends a dwelling mix of 15-20% 1-beds, 40-45% 2-beds, 35-40% 3-beds and 5-10% 4+ beds. The previous iteration of the scheme was broadly in accordance with this housing mix. However, pre-application advice recommended an adjustment to the affordable housing mix to address the need indicated by the Housing Register in Warnham. At the time of the pre-application advice, this had 208 households waiting for housing of which 46 households (22%) were in need of a 1-bedroom unit, 38 households (18%) were in need of a 2-bedroom unit, 92 households (45%) were in need of a 3-bedroom unit and 32 households (15%) were in need of 4 or more bedrooms. This required a higher percentage of the affordable rented units to be 3 and 4 bed units. The pre-application advice therefore recommended the affordable rented housing mix to be adjusted to that now proposed.

7.6 The scheme proposes 35% affordable housing, in accordance with Policy 16 of the HDPF.

Layout and Design

7.7 The Design and Access Statement which accompanies this planning application explains the process that has been followed in evolving the proposed layout and provides detail on every aspect of the layout and design.

7.8 The layout has taken into account various constraints and sensitivities including access requirements, proximity to neighbouring properties, the Conservation Area, trees, wildlife, topography and drainage. It also takes into account the site's position as a transition from the urban to rural environment.

7.9 Pre-application advice was largely supportive of the layout and where recommendations for amendments were suggested, these have been followed where possible. The central area has been made less dense and plot sizes increased, with an associated reduction in the size of the parking court.

7.10 The layout provides for an appropriate level of open space, car and cycle parking, and refuse storage to provide an attractive and functional space.

Ecology

7.11 The site has been the subject of a range of surveys including a Phase 1 habitat survey and detailed surveys for bats, great crested newts, hazel dormice and reptiles. These confirmed that the habitats onsite are common and widespread. Much of the site area is of low ecological value, with little vegetation cover and heavily modified by human activities. However, bramble scrub in the field margins provides dense vegetation cover which may be of value to wildlife. The native hedgerows, native hedgerows with trees, and lines of trees provide good habitat connectivity across the landscape and offer habitat for a range of wildlife. Most of the native hedgerows are priority habitat. The individual trees also have biodiversity value.

7.12 The bat survey found a moderate level of bat activity on the hedge and tree line. The survey did not however find any evidence of the hedge and tree line being used as a key commuting route between maternity roosts and foraging grounds. As such, the introduction of a road through this line as been assessed as unlikely to be of significant detriment to any bat colonies in the local area. A Bat-Sensitive Lighting Strategy will be prepared to minimise impacts. Other mitigation measures include the provision of 10m habitat buffers between the development and hedgerows and tree lines, minimising hedgerow removal, and including areas of semi-natural habitat to provide suitable foraging opportunities.

7.13 In relation to great crested newts, two ponds were the subject of HSI assessments and eDNA testing which was negative. Whilst this result significantly reduces the likelihood that great crested newts use terrestrial habitats within the site, their presence cannot be definitely ruled out. A precautionary working method statement will therefore be prepared to ensure amphibians are safeguarded during construction works.

7.14 No evidence of hazel dormice was found on the site, however on-site habitats are suitable for them and therefore a 'toolbox talk' will be given to contractors prior to the start of clearance works.

7.15 The reptile survey found an 'exceptional' population of slow worms and a low population of grass snakes using all field margins. To protect these important areas, field boundaries are to be retained and 10 metre buffers provided, the area alongside which will be inaccessible to residents and the wider public. These buffers and areas of public open space will be the subject of a mitigation and method statement to ensure their appropriate management.

7.16 Biodiversity Net Gain in excess of the mandatory requirement is achieved. There will be a 28.83% net gain of habitat units, and 14.15% net gain of hedgerow units.

Conservation Area and Heritage Impacts

7.17 The majority of the proposed application site is outside of Warnham Conservation Area, but the new access route from Threestile Road is within the conservation area. The site is also within the setting of numerous listed buildings, those with the potential to be affected and assessed in this report are; Old Manor House, Barn to North East of the Old Manor House (both grade II), The former Village School (grade II), The Sussex Oak Inn (grade II) and Stables adjoining No2 (The Sussex Oak Inn) on South Side.

7.18 The scheme would result in less than substantial harm to the character and appearance of Warnham Conservation Area as a result of the change within its setting. However, the effect of this has been mitigated by the proposed design, layout and materiality of the new housing which has given careful consideration to the existing historic built form within the village and the green character of the area. The harm identified should be weighed against the benefits of the proposals as set out in the Planning Statement by Batcheller Monkhouse.

7.19 There will be no effect on the significance of any of the identified listed buildings by a change within their setting. The proposed new development would not compete with these buildings or change an understanding or appreciation of their significance.

Landscape Impacts

7.20 The scheme has been designed with landscape consultants from the outset. The application is supported by a Landscape and Visual Appraisal which finds that the landscape effects of the scheme would vary from moderate adverse to moderate beneficial.

7.21 Residual landscape effects on these receptors are as follows:

- Topography and soils: Low adverse
- Vegetation and nature conservation: Moderate to major beneficial
- Perceptual qualities: Moderate to minor adverse

- Pattern of Landscape: Minor to moderate beneficial
- Access and recreation: Minor beneficial

7.22 Visual effects will vary from neutral to major adverse.

7.23 Residual visual effects of the proposed development would be at worst moderate adverse for near distance receptors at neighbouring properties to the south of the site. This level of effect does not cross the threshold of significance once time has elapsed and landscape proposals establish. Many of the more distant viewpoints are assessed as having low adverse visual effects as a result of the proposed development: largely due to the context of the view, where proposals would be set within surrounding development; and where proposals would form a small component within a wider vista.

Access and Parking

7.24 The access strategy takes account of the quality of the local road network connections, the impact on the village, Warnham Neighbourhood Plan requirements and enables enhanced pedestrians and cyclist permeability.

7.25 The proposed access arrangements have been subject to a visibility assessment. The requisite visibility is achievable from the proposed access points in accordance with Manual for Streets requirements.

7.26 A vehicle swept path analysis has been undertaken demonstrating appropriate operation of the proposed access points by a variety of vehicle classes, including service and emergency vehicles.

7.27 The proposed vehicle and pedestrian access arrangement has been subject to an independent Stage 1 Road Safety Audit. The site's internal carriageways have also been designed in accordance with the principles of Manual for Streets. The internal layout has been subject to a geometric design review, vehicle swept path analysis and visibility assessment demonstrating safety and appropriate operation. Service vehicles can negotiate the internal carriageways and undertake servicing activities in a forward gear. Bin carry distances between dwellings and refuse collectors are in line with thresholds set out in Manual for Streets.

7.28 Emergency access to the proposed dwellings would accord with the requirements of Building Regulations Part B.

7.29 A TRICS assessment suggests that the development will generate an additional 284 daily vehicle trips on the local road network, with an addition 30 and 29 trips in the AM and PM peak periods. A Traffic Distribution Model and Traffic Assignment Model has been provided to demonstrate the site's traffic impact at local road junctions. The site would result in negligible impact on the local road network.

7.30 Cycle and car parking has been provided in accordance with standards.

Neighbouring Amenity

7.31 Existing residents' privacy, light and visibility is being protected through retained and enhanced hedgerows; non-residential buffers adjacent to existing residential boundaries; lower densities near the Conservation Area; and limiting development to 2 storeys.

Flood Risk and Drainage

7.32 The site lies within Flood Zone 1 with a less than 0.1% chance of river flooding occurring each year. The submitted Flood Risk Assessment indicates a low risk of flooding from all sources both now and in the future.

7.33 The drainage strategy has been designed in accordance with the design criteria outlined in West Sussex County Council's LLFA Policy for the Management of Surface Water to ensure compliance with local policy requirements. The results of hydraulic modelling show that the surface water drainage strategy will manage flood risk on and off site. It is also able to mitigate all pollution hazards created on site using SuDS features.

7.34 Southern Water has confirmed that there is sewer capacity for the proposed development, however if for any reason a gravity connection to the foul sewer network is not possible, a location for a pumping station has been provided for within the site layout as a precautionary approach.

Arboriculture

7.35 None of the trees on site are affected by Tree Preservation Orders. A total of four individual trees, small sections of tree groups and the majority of a further tree group are proposed for removal. All Category A and B trees, including those with veteran characteristics, are to be retained and protected effectively. The removal of the identified trees will not result in the loss of trees of high amenity value or trees which make an essential contribution to the street scene and will not result in a significant, long-term or irreversible impact on the arboreal character of the site or the conservation area.

7.36 As there will be no requirement for facilitation pruning, there will be no adverse impact to the health or stability of the trees, nor will any negative landscape impacts occur to trees as a result of the proposals.

7.37 Assessment of the current physiological condition of the subject trees, their relative tolerance of root pruning and disturbance, existing and proposed finished levels, and the protective measures set out within the submitted Arboricultural Method Statement, suggests that there will be no lasting or irreversible damage to the trees to be retained, subject to full compliance with the submitted Tree Protection Plan.

Open Space

7.38 The site's open space provision has been based on the Horsham District Council Open Space, Sport & Recreation Review (2021). The proposed provision is compared with the space standard in Table 7.1 below.

Table 7.1 – Required and Proposed Open Space Provision

Open Space Typology	Standard (sqm per person)	Minimum requirement for Tilletts Lane scheme (based on population size of 122 people)	Proposed Provision
Park	13.7	1671.4sqm	
Amenity / Natural greenspace	5.8 / 24.3	707.6sqm / 2964.6sqm	5202sqm
Children's play space	0.5	61sqm	
Young people's space	0.4	48.8sqm	569sqm

7.39 The proposed provision is therefore well in excess of the standard requirement.

Water Neutrality

7.40 The houses have been designed to use 56.47 litres of water per person per day. This efficient is achieved through the use of water efficient fixtures and fittings and rainwater harvesting.

7.41 The total water demand for the scheme would be 6,880.32 litres per day. As the site is allocated it can access the Sussex North Offsetting Water Scheme (SNOWS). An application for access to SNOWS will be submitted as soon as it launches.

8 SUMMARY

- 8.1 This Planning and Affordable Housing Statement supports a full planning application for a residential development comprising 59 dwellings on a 4.25-hectare site located east of Tilletts Lane in Warnham, West Sussex. Of the 59 proposed homes, 35% are designated as affordable housing in line with policy requirements.
- 8.2 The site lies on the northern edge of Warnham village and currently consists of agricultural fields bordered by established trees and hedgerows. The area is adjacent to residential properties, a primary school and a football pitch. The site lies within Flood Zone 1, indicating low flood risk, and is not within any nationally designated landscapes or protected ecological designations.
- 8.3 The proposed development features a mix of 1- to 4-bedroom homes, with a particular focus on 2- and 3-bedroom units to meet identified local housing needs. All homes are designed to be two storeys tall and will incorporate traditional materials and design features inspired by the local vernacular, as detailed in the Warnham Pattern Book. All dwellings will be built to M4(2) accessible and adaptable standards and meet Nationally Described Space Standards. The homes are designed to be highly energy-efficient, with EV charging points, ultrafast broadband, and use low-impact materials.
- 8.4 The affordable housing provision consists of 21 dwellings, with 15 for affordable rent and 6 for shared ownership. This mix has been adjusted based on local housing register data and council recommendations to increase the number of 3- and 4-bedroom units. These homes meet all relevant space and accessibility standards and are clustered for effective management. Though a housing provider has not been secured due to timing uncertainties, the design has been informed by specialist advice to align with provider expectations.
- 8.5 Parking provision includes 116 allocated and 31 unallocated car parking spaces, along with 10 visitor spaces for football pitch users. Electric charging points for each dwelling and 69 cycle spaces across the development will also be provided. The site will offer over 5,200 square metres of public open space, including play areas (a LAP and LEAP), a community orchard, and informal greenspace.
- 8.6 Access to the development will be provided via Threestile Road and Tilletts Lane, with new junctions designed to meet highway safety and service vehicle requirements. A network of new footpaths, including an upgrade to Public Right of Way 1430, will improve pedestrian and cycle connectivity.
- 8.7 The site design incorporates a Sustainable Drainage System (SuDS) using three attenuation basins and permeable paving to manage surface water runoff and improve biodiversity.

- 8.8 Ecological considerations have been central to the proposal. Extensive surveys have been conducted for protected species including bats, great crested newts, reptiles, and hazel dormice. Mitigation and enhancement measures include 10-metre habitat buffers, new tree planting, hedgerow enhancements, and wildlife features such as bird boxes, log piles, and hibernacula. The development will achieve in excess of the mandatory 10% Biodiversity Net Gain (BNG).
- 8.9 The development complies with both the Horsham District Planning Framework and the Warnham Neighbourhood Plan which allocates the site for a minimum of 50 dwellings. The scheme satisfies the neighbourhood plan's specific requirements, such as delivering on-site affordable housing, providing a mix of house types, creating public green spaces, and maintaining important landscape features. The layout and density have been adjusted in response to pre-application feedback from Horsham District Council, particularly in relation to affordable housing mix, open space provision, and ecological buffers.
- 8.10 The planning statement concludes that the proposal is in full conformity with the relevant local and national planning policies. It addresses housing need, preserves local character, and enhances biodiversity while delivering sustainable infrastructure and design. The development represents an appropriate and sustainable extension to the village of Warnham.

APPENDIX A



Miss Clare Bartlett
Batcheller Monkhouse
57 Lower Street
Pulborough
RH20 2AZ

Our ref: PE/24/0203
Your ref:
Officer: Stephanie Bryant
Email: Stephanie.Bryant@horsham.gov.uk
Tel:
Date: 17th January 2025

Dear Sir/Madam,

Location: Land East of Tilletts Lane, Knob Hill, Warnham, West Sussex

Details: Erection of 60 dwellings and associated accesses, landscaping and parking

Your enquiry has been considered and I can advise as follows:

Pre-application advice is sought for the erection of 60 dwellings and associated accesses, landscaping and parking at Land East of Tilletts Lane, Knob Hill, Warnham, West Sussex.

The advice is given based on the following:

- Housing Mix
- Illustrative Layout
- Pre-application statement
- Concept plan and sketch perspective
- Housing character types
- Design development
- Opportunities and constraints
- The vision
- Statement of intent
- Observations from site visit on 05/11/2024
- Pre-application consultee comments from HDC Housing, HDC Landscape Architect and HDC Conservation Officer.

Site and Surrounds:

Land East of Tilletts Lane is located within the settlement boundary of Warnham village in the north of Horsham District and comprises of two agricultural fields. The site is allocated in the Warnham Neighbourhood Plan (Policy W6).

The two fields are separated by a strip of trees and vegetation. The western field, which is the larger of the two, is bounded by trees and hedgerow on all sides with an open grassed field beyond to the north and east, residential dwellings along Freeman Road beyond to the south, and Tilletts Lane beyond to the west. The eastern field is also surrounded by trees and hedgerows with an open grassed field beyond to the north and west, Warnham playing field (football pitch) beyond to the south, and residential dwellings beyond to the east.

The application site is located within areas of medium and high risk of great crested newts, the Sussex North Water Supply Zone, West Sussex Mineral Safeguarding Area for Brick Clay (Weald Formation), Flood Zone 1, and there are some small areas of low surface water flood risk. The site is also located adjacent to west of the Warnham Conservation Area and Public Right of Way 1430 also runs along the site's eastern boundary.

Planning history:

None

Development Plan Policies:

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires all applications for planning permission to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

The **Horsham District Planning Framework [HDPF]**, adopted in November 2015 is relevant and remains the starting point for the assessment of this proposal, with specific reference to the following policies:

- Policy 1 - Strategic Policy: Sustainable Development
- Policy 2 - Strategic Policy: Strategic Development
- Policy 3 - Strategic Policy: Development Hierarchy
- Policy 24 - Strategic Policy: Environmental Protection
- Policy 25 - Strategic Policy: The Natural Environment and Landscape Character
- Policy 31 - Green Infrastructure and Biodiversity
- Policy 32 - Strategic Policy: The Quality of New Development
- Policy 33 - Development Principles
- Policy 35 - Strategic Policy: Climate Change
- Policy 36 - Strategic Policy: Appropriate Energy Use
- Policy 37 - Sustainable Construction
- Policy 38 - Strategic Policy: Flooding
- Policy 39 - Strategic Policy: Infrastructure Provision
- Policy 40 - Sustainable Transport
- Policy 41 - Parking

Warnham Neighbourhood Plan (2019):

- Policy W1: Built-Up Area Boundary
- Policy W2: Scale of Housing Provision
- Policy W3: Housing mix – meeting local needs
- Policy W5: Design of residential development
- Policy W6: North of Freeman Road
- Policy W9: Parking standards for new residential development

Horsham District Local Plan (2023-40) (awaiting examination)

- Strategic Policy 1: Sustainable Development
- Strategic Policy 2: Development Hierarchy
- Strategic Policy 6: Climate Change
- Strategic Policy 7: Appropriate Energy Use
- Strategic Policy 8: Sustainable Design and Construction
- Strategic Policy 9: Water Neutrality
- Strategic Policy 10: Flooding
- Strategic Policy 11: Environmental Protection
- Strategic Policy 12: Air Quality
- Strategic Policy 13: The Natural Environment and Landscape Character
- Strategic Policy 14: Countryside Protection Policy 17: Green Infrastructure and Biodiversity
- Policy 19: Development Quality
- Policy 20: Development Principles

Policy 21: Heritage Assets and Managing Change within the Historic Environment

Policy 23: Infrastructure Provision

Policy 24: Sustainable Transport

Policy 25: Parking

Other Relevant Guidance and Policies:

- National Planning Policy Framework [NPPF] (2021)
- Planning Practice Guidance [PPG]
- Air Quality and Emissions Mitigation Guidance for Sussex (2020)
- Planning Advice Note: Biodiversity and Green infrastructure (2022)
- Planning Advice Note: Facilitating Appropriate Development (2022)
- Warnham Parish Design Statement (2007)

Planning Advice

Principle of Development

The site is allocated within the Warnham Neighbourhood Plan (WNP) under Policy W6 for residential development for a minimum of 50 dwellings, therefore the principle of residential development within this location has already been considered and found to be acceptable.

Housing Mix and Affordable Housing

Policy W6 of the WNP requires a minimum provision of 50 dwellings for this site. The submitted scheme proposes to deliver 60 units, therefore is policy compliant.

Policy W3 of the WNP recommends a dwelling mix of 15-20% 1-beds, 40-45% 2-beds, 35-40% 3-beds and 5-10% 4+ beds.

Affordable housing (AH) provision will need to reflect the policy requirements at the time of submission. Under the HDPF this would be a minimum 35% AH, with 70% of such housing to comprise Affordable Rent and the remaining 30% intermediate housing. Under the emerging Horsham District Local Plan (HDLP) the affordable housing requirement rises to 45% for all new housing development on greenfield land. The proposal comprises of 35% (21 units) AH provision, thereby complying with current development plan policy. Any application should confirm the affordable rent and intermediate housing split.

The Housing Register in Warnham currently has 208 households waiting for housing of which is broken down to 46 households (22%) in need of a 1-bedroom unit, 38 households (18%) in need of a 2-bedroom unit, 92 households (45%) in need of a 3-bedroom unit and 32 households (15%) in need of 4 or more bedrooms. These figures show an increased need for 3-bedroomed affordable rent homes consistent with similar data for the rest of the district.

The site has proposed to deliver the following mix of tenure sizes:

	Affordable Rented	Shared Ownership	Open Market Housing
1-Bedroom	5 (33%)	1 (16%)	6 (15%)
2-Bedroom	5 (33%)	3 (50%)	16 (41%)
3-Bedroom	4 (26%)	2 (33%)	13 (33%)
4-Bedroom	1 (6%)	0 (0%)	4 (10%)
	15	6	39

From the above data there is a clear indication that while the open market housing provision largely accords with WNP Policy W3, a higher percent of the affordable rented units need to be 3 and 4 bed units. Households with a 3 or 4 bed needs are the longest waiting on our housing register currently with some waiting as long as 8 years to be rehoused therefore we could encourage developers to consider this when allocating tenure sizes to affordable housing.

HDC Housing Officers recommend that the affordable housing tenure sizes and delivery is reconsidered to be in line with currently local demand, as follows:

	Affordable Rented
1-Bedroom	4 (27%)
2-Bedroom	4 (25%)
3-Bedroom	5 (35%)
4-Bedroom	2 (13%)
	15

No mention is made of a potential affordable housing provider, and Housing Officers would urge the applicant to reach an agreement with a provider as soon as possible to clarify and confirm tenure split and secure funding arrangements for the affordable homes and ensure the layout and specifications of the affordable units meet the provider's requirements. Housing Officers need reassurance that there are registered providers who would be willing to take on the site and tenure sizes as proposed.

There is also no mention of any affordable tenure that can be adapted according to need in the district such as wheelchair adapted units, wet rooms, or level access. About 30% of households on the councils housing waiting list require adaptions to a property. Housing Officers would encourage developers to consider this and to speak with affordable housing providers as soon as possible to clarify delivery of this need and provide a suitable number of affordable homes built to Part M4(2) and M4(3) standards.

In summary of the above, any submission should reflect a better affordable housing split as suggested above and include details of a potential affordable housing provider.

Layout and Design

Policy 32 of the HDPF states that good design is a key element in sustainable development and seeks to ensure that development promotes a high standard of urban design, architecture and landscape. Policy 33 of the HDPF states that development proposals should make efficient use of land, integrate effectively with the character of the surrounding area, use high quality and appropriate materials, retain landscaping where feasible (and mitigate loss if necessary) and ensure no conflict with the character of the surrounding town or landscape. The submission HDLP policies 19 and 20 and WNP Policies W5 and W6 have similar requirements on design, scale, massing and appearance. Warnham Parish Design Statement identifies a predominance of two-storey, bricked dwellings.

The proposed layout and design are well-considered to respect and reflect the site surroundings and character. While an outward facing approach is usually encouraged, I consider the backing of gardens onto the site boundaries is appropriate in this site context with thick hedgerow and tree boundaries, and helps to ensure the separation of public and private space, and clear defensible boundaries. Furthermore, given the topography of the site, with the north of the field being the highest, there are some wider landscape benefits to the buildings facing downwards and situated further from the northern boundary. Moreover, the inward facing approach along the southern boundary provides greater separation distances from the properties along Freeman Road thereby minimising the impact to neighbouring amenity.

There is one area where I have layout concerns. The central area with plots 29-41, and to a lesser extent with plots 12-38, is too dense with an overreliance on the car park courts. This creates disproportionately large central sections of hard standing for the parking courts relative to dwellings and private amenity space. This is particularly the case with the gardens for plots 30-35 which are too small, particularly as these are affordable housing units and do not seamlessly blend into the rest of the site. To address this, I recommend revising the layout of this area to reduce the internal parking courts and redistribute some of the parking within the frontage/side of plots 12-18 and plots 30-41, noting that parking should generally be located closer to the homes to be user friendly, especially for families with young children.

Any submission should also provide details on proposed cycle storage and waste storage and collection. Furthermore, given the topography of the site, existing and proposed levels plan are required with detail on any implications for gardens/plot boundaries to avoid significant changes in levels between gardens and associated tall boundaries.

Consultee comments

In regard to layout, our Landscape Architect has raised concerns with the reduced open space to the site's high point compared to that shown on Figure 5.3 within Policy W6 in that the proposed layout encroaches into this area. However, alternative open space is provided to the south of this area, providing a more open amenity area and better separation from the existing western treed boundary. Furthermore, the units located within the open space section have been sensitively designed such that I consider this proposed layout is still acceptable. I recommend including some justification on the incursion into this open space section to this effect and make sure the landscape assessment picks this up, particularly in terms of visibility and sensitivity.

In addition, the Landscape Architect recommends a softer more irregular nature to the northern units to provide a better design transition into the countryside and also reflect the urban fabric experienced within the adjacent conservation area. While I consider the backing of the gardens onto the site's northern boundary helps with this, I recommend exploring opportunities to stagger/reorientate the northern units and include some explanation/justification for the proposed approach with regard to the countryside transition within any submission to address the Landscape Architect's comments.

The HDC Conservation Officer reiterates similarly sentiments and has made the following comments:

The design of the road junctions should be sympathetic to this rural context. There should be a softening of these points of vehicular and foot traffic to avoid a suburbanising affect. I concur with comments made by the Landscape Architect in regard of the landscape impact. The development should be designed to appear as settlement in the countryside rather than imposed upon it. To this end maintaining the mature tree boundaries and treating surfaces and street lighting with a sympathy for the rural setting is essential.

The Landscape Architect has raised whether the southwestern PROW connection could be located further north to negate the need for stepped access and reduce impact to trees in this location. However, the pre-application submission statement suggests this is the only option. Please can this be expanded on within any submission to justify this approach. It is understood from the site visit that the proposed PROW connection point follows an existing informal pedestrian route and therefore would result in the least impact to the existing trees and vegetation and the shortest distance between the site and PROW 1428 along Tillets Lane. With this in mind, I consider that an argument could be made to justify the proposed approach.

Conservation Area, Landscape and Neighbouring Amenity

Policy 33 of the HDPF states that development should consider the scale, massing, and orientation between buildings, respecting the amenities and sensitivities of neighbouring properties and ensuring unacceptable harm to amenity of neighbouring properties, such as overlooking or noise, is avoided. Strategic Policy 11 of the submission HDLP requires development proposals to minimise lighting impacts on neighbouring sites. Strategic Policy 20 of the submission HDLP requires development to be designed to avoid unacceptable harm to the amenity of existing and future occupiers or users of nearby property and land, for example due to overlooking, over dominance or overshadowing, light pollution, traffic generation, and general activity, noise, odour and/or vibration.

The HDC Conservation Officer has reviewed the scheme and has made the following comments:

I would expect an assessment of the impact within the setting of the conservation area as part of any planning application. I would also expect a montage provided to show the visual impact of the development when viewing the village from Knob Hill.

Accordingly, please ensure any submission includes a conservation area impact assessment and photomontage visual impact of the proposed development from Knob Hill.

The Landscape Architect's full comments are included at Appendix 1 of this advice letter. I have commented on the layout and landscape feature elements in the layout section above but recommend reviewing the soft landscaping, open space strategy/play provision, boundary treatments and hard landscaping, and lighting recommendations and incorporate and address these within any submission. In particular regard to the open space strategy, I recommend including an Open Space Plan within any submission which illustrates the open space provisions across the site as well as a table which sets out the Open Space, Sports and Recreation Review requirements for the site and how the proposal meets this.

I am satisfied that the proposed design and layout has considered the potential impacts to the neighbouring residential properties through appropriate separation distances and boundary planting. The Design and Access Statement for any submission should provide commentary on this, particular with regard to overlooking, light and noise given the elevated topography of the site.

Highways, Traffic and Access

Policy 33(8) of the HDPF requires, where appropriate, the incorporation of convenient, safe, and visually attractive areas for the parking of vehicles and cycles without dominating the development or its surroundings.

The proposed parking provision exceeds the requirements of the West Sussex Parking Guidance, and the visitor parking spaces exceeds that within the WNP for the football pitch, although it is understood that the latter is in response to public engagement with the local community. Please include clear details of the proposed parking provisions within any submission and confirm how this meets the Parking Guidance and/or providing justification for a different approach. Parking is often a contentious issue and a concern with Members; therefore, this will be particularly important to address.

Details of cycle parking provision and EV charging spaces will also need to be provided as part of any submission in accordance with WSCC Parking Guidance.

I recommend incorporating raised table crossings at the turning heads where there aren't shared surfaces to ensure pedestrian prioritisation, including by plots 41, 28/36, and 24/29. I note that there is no pedestrian footway or shared surfacing for plots 51-54 and request that this is addressed within any submission.

The site allocation policy within the Warnham Neighbourhood Plan is quite detailed and make specific requirements, particularly with regard to access, parking and footpath links. As discussed above, the proposed onsite parking exceeds the 'up to 10' parking spaces required under policy W6(e) with regard to the football pitch. However, it is understood this is in response to public consultation. Clear detail of this should be included in any submission to explain this diversion from the policy W6 requirement.

Policy W6(f) requires segregated site access for cyclists and pedestrians from Threestile Road. This is not currently illustrated as such and it is understood that hedgerows on either side of Threestile Road will need to be cut back to facilitate the eastern site access. Any submission needs to address this policy requirement and detail how it will be met, noting standard width requirements for vehicle, cycle and pedestrian access.

Policy W6(k) requires a footpath link to the existing footpath networks to the east and west of the site, running adjacent to established hedgerows and Tillets Lane. The W6 policy map indicates the location of this along the northern site boundary with a secondary pedestrian only access in the southwest corner (W6(l) policy requirement). The illustrative layout includes the latter but the former runs through the development rather than along the northern site boundary. It is understood this is in part due to the inward facing design approach. As discussed above, an argument can be made in favour of this inward facing approach due to the established northern hedgerow and wider landscape benefits. However, this is a departure from the policy W6 requirements and therefore any submission needs to clearly justify this alternative approach. Part of this includes ensuring a prioritised pedestrian route through the site, which as noted above needs some amendments, such as in the form of raised table crossings and separate pedestrian footway outside plots 51-54.

Lastly, W6 policy map includes site access options. These are a single access from Tillets Lane (red route) or two site access points from Tillets Lane and Threestile Road (green route). The green route crosses the site in a northeast (at Threestile Road) to southwest (at Tillets Lane) trajectory, however the illustrative layout has the Tillets Lane access in the northwest of the site. As this is different from policy map W6 site access options, any submission needs to address and justify this alternative approach. Similarly, any submission should confirm the priority to northbound traffic and passing bays for southbound traffic on Tillets Lane as detailed within the W6 policy map.

I do not have any particular concerns with regard to the proposed site access approach, and use of bollards to prevent traffic flow through the site, provided the policy W6 matters are suitably justified.

Ecology, Biodiversity and Trees

Ecology

Policy 31 of the HDPP states that development will be supported where it demonstrates that it maintains or enhances the existing network of green infrastructure. Development proposals will be required to contribute to the enhancement of existing biodiversity and should create and manage new habitats where appropriate.

Circular 06/2005 identifies that the presence of protected species is a material consideration when considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat. Therefore, it is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed application, is established before planning permission is granted. Information on biodiversity impacts and opportunities should inform all stages of development, and an ecological survey is usually necessary where the type and location of development are such that the impact on biodiversity may be significant and existing information is lacking or inadequate.

Parts of the site are located within the Red Impact Risk Zone for Great Crested Newts (GCN), which is considered to be the suitable habitat with a high likelihood of Great Crested Newts being present. The application site is also located within the supporting area for bats. Therefore, should an application be submitted, it would need to be supported by a Preliminary Ecological Assessment, with Great Crested Newts surveys and Bat and Bird Scoping Reports. Please note the council has a District Licence for Great Crested Newts.

Trees

Policies with the HDPF and submission HDLP encourage the retention and protection of existing trees, and enhanced tree planting to mitigate any loss and improve the biodiversity of the site. The proposed site falls within I2 Warnham & Rusper Wooded Ridge (LCA) as defined by the Horsham District Landscape Character Assessment (2003).

It is noted that there are existing trees within the site and in accordance with policy, I encourage that these are retained and protected. For any submission, a tree survey would be required for all existing trees on the site and their condition. This should inform an Arboricultural Assessment, which will also be required at submission. The Arboricultural Assessment should include details of any trees to be removed with justification for their removal, tree protection measures for retained trees, proposed planting, and a shade diagram (given potential implications for private gardens or plots 48-54). This should be accompanied by plans showing the existing trees and their root protection areas (RPAs), tree protection measures and new tree planting. Please note that as this is a green field site, any engineering within tree RPA's requires overriding justification in accordance with BS5837.

In view of the LCA designation, the Landscape Architect expects future proposals to contribute to the rural, wooded character of the area. Accordingly, additional tree planting is recommended within the site, along the roads and to supplement the existing boundary vegetation.

The Landscape Architect has raised concerns with plot gardens abutting the existing northern and southern trees as any trees within private amenity space cannot be guaranteed protection. This is a particular concern for veteran tree T58. It is therefore requested that the layout be revised the boundary trees and vegetation are clearly excluded from the private gardens to remove conflict within RPAS, along with supplementary boundary enhancement planting and a maintenance strip between the garden boundary and existing landscape features. Alternatively, I have discussed this with the Tree Officer and the northern and southern boundaries could be put under a Tree Preservation Order following any permission being granted. This would negate the need to separate the boundary vegetation from private gardens by way of a maintenance strip and fencing.

The Landscape Architect has also raised concerns with the proposed pedestrian access through the southern hedgerow boundary with the football pitch. It is unclear whether this is an existing or proposed access point and why a second pedestrian access point is required at this location. As the hedgerow is located outside the red line boundary, it is unclear how much opportunity the applicant has to provide infill, enhancement planting. Any submission should clarify the above and either provide enhancement planting or justify the second pedestrian access at this location where possible.

Biodiversity

Biodiversity Net Gain is mandatory as of 12 February 2024, meaning should an application be submitted for this development, at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat will need to be demonstrated as deliverable and subsequently delivered.

The HDLP includes a policy which requires 12% net gain. This would include the submission of a completed biodiversity metric and statement. Further information can be found on the government's biodiversity net gain webpage:

<https://www.gov.uk/guidance/biodiversity-net-gain#biodiversity-net-gain-submitting-a-planning-application>

Any submission will need to include a completed biodiversity metric and statement, which demonstrates the required net gain percentage at the time of submission. Please also note that a s106 legal agreement will be required to significant onsite BNG or offsite BNG not involving the purchase of units/credits.

Water Neutrality

The application site falls within the Sussex North Water Supply Zone as defined by Natural England which draws its water supply from groundwater abstraction at Hardham. Natural England has issued a Position Statement for applications within the Sussex North Water Supply Zone which states that it cannot be concluded with the required degree of certainty that new development in this zone would not have an adverse effect on the integrity of the Arun Valley SAC, SPA and Ramsar sites.

Natural England advises that plans and projects affecting sites where an existing adverse effect is known will be required to demonstrate, with sufficient certainty, that they will not contribute further to an existing adverse effect. The received advice note advises that the matter of water neutrality should be addressed in assessments to agree and ensure that water use is offset for all new developments within the Sussex North Water Supply Zone.

Accordingly, a Water Neutrality Statement (WNS) would be required as part of any submission. I highly recommend reviewing the Horsham Water neutrality and planning applications FAQs page to get clarity on the detail expected within a WNS:

<https://www.horsham.gov.uk/planning/water-neutrality-in-horsham-district/water-neutrality-and-planning-applications>

It has been queried within the pre-application submission whether the site would qualify for SNOWs. SNOWs will only be made available to sites which fully accord with the development plan and/or are allocated sites. Therefore, this site would qualify for SNOWs. Please note that there will be a prioritisation system which will dictate when qualifying sites will be able to access SNOWs. Please review the Council's website for further information on this at this time and consider whether any potential time delay implications would impact the delivery of the scheme and therefore whether alternative means of offsetting would be preferred:

<https://www.horsham.gov.uk/planning/water-neutrality-in-horsham-district/sussex-north-offsetting-water-scheme-snows>

Flood Risk and Sequential Test

Paragraph 175 of the NPPF is clear that a sequential test is not required where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising, or other potentially vulnerable elements will be located within an area at risk of flooding from any source now and in the future. Policy 38 of the HDPF is clear that where there is the potential to increase flood risk, proposals must incorporate the use of sustainable drainage systems (SuDS) where technically feasible or incorporate water management measures which reduce the risk of flooding and ensure flood risk is not increased elsewhere.

According to EA mapping, there are small sections of the site with a low risk of surface water flooding. It is therefore important that a flood risk assessment is submitted as part of any application alongside a Drainage Strategy, which incorporates SuDS and takes account of existing undergrounder services and tree RPAs.

In regard to SuDS, the Landscape Architect has provided the following comments:

- *Proposed surface water attenuation areas focus predominantly on end of pipe solutions by concentrating on the water storage and slow-release aspects of SuDS. We encourage the surface water strategy to be revisited to explore the 4 pillars of SuDS which include amenity, water quality, water quantity and biodiversity. There are a number of opportunities that can be introduced by implementing tiers or hierarchies of landscape features (no more than 150mm to 300mm deep) such as swales, rain gardens, rills, blue green roofs, etc. The introduction of these features would likely reduce the size or depth of the proposed basins, providing opportunity for better integration within the landscape and amenity space.*
- *We expect to see drawings and levels for the attenuation basins and further potential SuDS proposals.*
- *The ground contouring, planting and inlet and outlet design should be carefully considered to maximise the amenity value.*
- *Attenuation basins should blend aesthetically into the surroundings and must not look like steep sided engineered structures.*
- *Attenuation areas and swales should additionally be combined with variations in vegetation structure to ensure habitat diversity and landscape effect. These should be included within the planting schedule and their specific maintenance within the LMMP.*
- *We recommend blue green roofs are introduced to ancillary structures such as bin and cycle stores. If proposed, we expect to see details within a plant schedule and specific maintenance within the LMMP.*

Please consider these comments to ensure any submission follows the SuDS hierarchy and justifies the approach with regard to sustainable drainage management on site.

Conclusion:

In summary, the principle of development is acceptable as this is an allocated site and generally the proposed layout and design is supported, with the exception of the central section's density, northern and southern vegetation boundary separation and parking court arrangement which needs revising.

In regard to the site allocation and WNP Policy W6 requirements, parts (a), (c), (g), (i), (l) and (m) are met within the pre-application submission.

In regard to Policy W6(b) and affordable housing, a greater number of 3-bed rental homes is required alongside details of a potential affordable housing provider and how affordable tenure can be adapted.

The indicated housing types and design is good and suggests that Policy W6(d) (and thereby also W3, W4 and W5) would be met through the proposal, although any submission would need to include full details of the housing types to confirm this.

The Landscape Architect and Conservation Officer have provided advice in regard to landscaping for the site and submission requirements. Some minor changes to the layout to address this, particularly with regard to W6(m) and the Conservation Officer's comments, proposed enhancements to the northern and southern vegetation boundaries (W6 h and j), and separation of the existing northern and southern vegetation boundary from private gardens. Additional information and justification is also required on several points as part of any submission. As noted above, it is considered that an argument can be made in favour of the inward facing layout approach, given the thickness of the vegetation boundaries, topography of the site, and separation distances/screening it facilitates for neighbouring amenity.

As detailed in the Highways section above, there are some diversions from the Policy W6 requirements (e, f, k) with regard to access and public footpath connections which also need addressing and justifying within any submission. The proposal includes an overprovision of parking

spaces, due to local demand for more visitor spaces, which is not considered a significant concern. It is also important to avoid on-street parking given this connected but still rural fringe site location. Full details and justification on proposed parking provision, along with cycle parking and EV charging, should be provided as part of any submission.

Standard surveys and assessments are required with regard to ecology and trees, but please note the need for overriding justification for engineering (this includes any hand-tool works or hardstanding) within tree RPA's.

Advice has been provided with regard to Water Neutrality and qualification for SNOWs. Further information is on the Horsham website.

In regard to policy W6(2), any submission should confirm the proposed utilities infrastructure, ensuring this does not conflict with existing vegetation or proposed planting.

Application Submission

In the event that all of the above matters can be satisfactorily addressed and mitigated for, then the following provides a 'without prejudice' summary of the supporting documents that would be expected to be submitted. In addition to the application form, fee and usual suite of location plans and architectural drawings, the supporting documents that should be submitted include:

- Planning Statement, including affordable housing provision.
- Design and Access Statement.
- Elevational drawings, including existing and proposed heights and finishing materials.
- Photomontages visual impact from Knobs Hill.
- Landscape Impact Assessment.
- Conservation Area Impact Assessment.
- Open Space Plan.
- Access plans with visibility splays.
- Transport Statement and details on proposed vehicle and cycle parking.
- Preliminary Ecological Appraisal and surveys, including on Newts, bats, birds and badgers.
- Arboricultural Impact Assessment including existing tree survey and plans of existing trees, tree protection measures and proposed tree planting.
- Biodiversity Net Gain DEFRA Metric and statement.
- Water Neutrality Statement.
- Flood Risk Assessment (reference to all sources of flood risk and taking account of climate change).
- Drainage Strategy (any SuDS proposals must reflect and be coordinated with the proposed landscape strategy)
- Air Quality Assessment.

In terms of engagement, you may wish to liaise with Warnham Parish Council to arrange to attend their Committee Meetings to present your plans, before considering a formal submission to HDC. You may also wish to contact residents who live nearest the site to brief them about the proposals, and to ascertain their views. It is noted that separate discussions with West Sussex County Council on highways matters have already taken place which should be helpful. A Statement of Community Involvement should be submitted with any future planning application to summarise what was undertaken.

The above comments are given as the opinion of the Case Officer and do not prejudice any outcome of a subsequent application. Should you submit a formal planning application, please quote reference number PE/24/0203 in your submission.

Yours faithfully

Stephanie Bryant
Senior Planning Officer

COMMUNITY INFRASTRUCTURE LEVY (CIL)

Horsham District Council implemented a Community Infrastructure Levy (CIL) Charging Schedule on 1st October 2017.

The Community Infrastructure Levy is a charge placed on new development. The funds raised will help to pay for a wide range of infrastructure to support development across Horsham District.

Most new development which creates net additional floorspace of 100m² or more, or creates a new dwelling, (including permitted development), is potentially liable for the levy.

How does it affect you?

Applications for CIL liable development which are determined on or after 1st October 2017 are required to pay the Community Infrastructure Levy (unless the development qualifies for relief or exemption).

Further information and the rates charged by Horsham District Council are set out in the CIL Charging Schedule which can be viewed online at www.horsham.gov.uk/planning/apply/cil

General Consent e.g. Permitted Development

Developments which are permitted by way of a general consent (such as permitted development) may still be liable to pay the Community Infrastructure Levy if they meet the above criteria.

In these circumstances, you must submit a Notice of Chargeable Development (CIL form 5), notify us of the person who will assume liability to pay the CIL and make any applications for relief or exemption, before the development is commenced.

SUMMARY OF COMMENTS & RECOMMENDATION:

Whilst we acknowledge that the Site has capacity for development and is allocated within the Warnham Neighbourhood Plan, further consideration of the layout, design, buffer and structural landscaping needs to be given with the intention of enhancing the scheme to ensure landscape and visual harm is appropriately mitigated and opportunities taken to enhance the landscape and visual resources. The current layout presents a number of issues and concerns which are discussed in detail below.

In addition to the LVA discussed within the submitted information, any forthcoming application must also include information as listed in our website under guidance for preparing a planning application, landscape requirements advice, which can be found here. As part of the accompanying information, it must also have a land budget plan that demonstrates compliance with Horsham District Council's Open Space, Sports & Recreation Review in regard to sizes, walking distances, buffer zones and spaces design.

MAIN COMMENTS:

Layout and landscape features

1. In order to mitigate adverse impacts on landscape character and visual amenity, and to comply with HDPF Policy 26, 31 and 33 (6) of the HDPF, existing vegetation must be protected, conserved and enhanced.
2. We note in addition that the proposed site falls within I2 Warnham & Rusper Wooded Ridge (LCA) as defined by the Horsham District Landscape Character Assessment (2003). Therefore, we expect future proposals to contribute to the rural, wooded character of the area.
3. Site development principles within the Warnham Neighbourhood Plan, Policy W6, Figure 5.3, highlight a portion of land on the northern boundary at the site's highest point as being open space, given the high value views as also identified within the pre-application statement. This area, however, has been encroached by proposed housing in the illustrative masterplan submitted. Given the visibility and therefore sensitivity of the location we wouldn't be supportive of the current layout and recommend that the layout is revised in order to accommodate a larger open space to the north, as highlighted.
4. Existing landscape features such as the tree belts along the northern and southern boundaries, must not be enclosed within or behind back gardens as this places them at considerable risk of future lopping or felling pressure. They are a prominent feature in the receiving landscape and their loss or deterioration would have a significant adverse effect on the character of the area. Concern is raised with the future integrity of these tree belts, therefore we recommend that the layout is revised to remove the garden plots backing onto the existing boundaries.
5. The preferred approach is to have the roads running along the existing boundaries to safeguard these features, as well as enhancing them through further tree planting along streets with generous verges.
6. Failing the above, the location of any proposed boundary treatment that clearly excludes the existing vegetation from plot ownership must be detailed in future proposals as well as the layout reviewed and amended to consider the relationships and remove conflict within RPAs, such as Veteran tree T58, as their retention cannot be secured within private amenity space. This is especially relevant to the eastern parcel, where changes to the road layout may be impracticable. We recommend that the advice of the Council's arboriculturist is sought, especially in regard to T58.
7. Please note, a maintenance strip will also be required between the garden boundary and the existing landscape feature.
8. The required PRoW connection is proposed in the south-west corner of the site, within the RPAs of category A and B trees. Given the degree of change in topography, stepped access is proposed, however this is not appropriate for all users. It is advisable therefore that the PRoW connection should be located elsewhere for accessibility and for minimising disturbance to trees that significantly contribute to the wooded character of the area. See

point 3 in regard to adjusting the road layout, thereby creating suitable access for PRow users.

- The eastern parcel of the site is located within Landscape fringe 3 of the Warnham Conservation Area Appraisal and Management Plan and is described as having a high sensitivity to change associated with development and as playing a key role in the rural setting of the Conservation Area. Equally, the site is located at the edge of settlement and in a visually prominent position therefore the parcels along the northern part of the site must be of a softer more irregular nature, to provide a better design transition into the countryside and also reflect the urban fabric experienced within the adjacent conservation area.
- We note that the hedgerow separating the Playing Field from the eastern parcel has not been surveyed within the Tree Report & Constraints Appraisal. Given that access is proposed through this hedgerow, this should be assessed in full to identify its quality and to ascertain a suitable location with minimal disturbance. It may be the case that the existing access point to the east is sufficient. In addition, this hedgerow should be enhanced in line with recommendations set out within the Landscape Character Assessment.

Soft landscaping

- Introduced features such as the orchard are welcomed.
- As outlined in points 3 and 8, we expect a greater provision of tree, hedgerow and buffer planting to break up the built form of development, reflect the rural character and to offer amenity value, with large specimen trees along streets as well as reinforcing and enhancing existing green infrastructure links. Reinforcing of these links should be done with native species so as not to outcompete existing vegetation.
- Service runs must be considered from the outset so that the tree planting is not diluted later on in the process. Service runs should be indicated in the landscape strategy to demonstrate that it can be delivered.
- A predominance of one species or variety should be avoided in order to minimise the risk of widespread biotic threats. We recommend following Santamour's rule of 30:20:10 where no more than 10% of proposed trees should be the same species, no more than 20% should be the same genus and no more than 30% should be the same family. a. Plants should be sourced from seed or stock from the Region of Provenance 40 in order to ensure resilience and therefore successful establishment.
- Where amenity grassland is to be proposed, this should be improved where possible with higher biodiversity and amenity value features such as bulbs, flowering lawns and wildflower meadows. In addition, we recommend the use of drought tolerant and carbon sequestering grasses (see here for an example) in order to reduce water usage and maintenance efforts.
- Please note that we strongly recommend that chemicals including herbicides, pesticides and fertilisers are not to be applied on site at any time due to impacts on existing and proposed waterbodies, ditches, hedgerows and the protection of their ecological features. For large areas of land, alternative methods should be considered such as hot foam or hot water systems.

Open space strategy/play provision

- A land budget plan indicating compliance with HDC's Open Space, Sports & Recreation Review must be submitted. It must demonstrate the open space strategy with sizes, buffer zones and walking distances from dwellings. SuDS

SuDS proposals

- Proposed surface water attenuation areas focus predominantly on end of pipe solutions by concentrating on the water storage and slow-release aspects of SuDS. We encourage the surface water strategy to be revisited to explore the 4 pillars of SuDS which include amenity, water quality, water quantity and biodiversity. There are a number of opportunities that can be introduced by implementing tiers or hierarchies of landscape features (no more than 150mm to 300mm deep) such as swales, rain gardens, rills, blue green roofs, etc. The introduction of these features would likely reduce the size or depth of the proposed basins, providing opportunity for better integration within the landscape and amenity space.
- We expect to see drawings and levels for the attenuation basins and further potential SuDS proposals.
- The ground contouring, planting and inlet and outlet design should be carefully considered to maximise the amenity value.

21. Attenuation basins should blend aesthetically into the surroundings and must not look like steep sided engineered structures.
22. Attenuation areas and swales should additionally be combined with variations in vegetation structure to ensure habitat diversity and landscape effect. These should be included within the planting schedule and their specific maintenance within the LMMP.
23. We recommend blue green roofs are introduced to ancillary structures such as bin and cycle stores. If proposed, we expect to see details within a plant schedule and specific maintenance within the LMMP.

Boundary treatments & hard landscaping

24. Where visible and where abutting the public realm, we recommend implementing brick walls for back garden boundary treatments. Front garden boundary treatments could also include brick wall and metal railing details with hedgerow planting behind or picket fencing which is characteristic of the village boundary treatments.
25. We expect climber planting to be provided across the scheme and boundary treatments, particularly where they face onto the roads, pathways, public open space and other key locations within the public realm.
26. We recommend the use of block paving or bound gravel where possible as it is considered to be sympathetic to the rural surroundings and both surfaces can be permeable.
27. Any parking courts and bays should consider the length of parking rows and must be softened and broken up with tree and hedgerow planting. Suitable space must be allowed within the concept layout for this to be delivered.

Lighting

28. Wooded ridges and hedgerows, which are key characteristics of the local landscape, can be deteriorated due to increasing levels of light pollution, therefore light spill must be considered sensitively so as not to cause potential adverse effects.
29. If outside lighting cannot be reasonably avoided, based on guidance from SDNP Dark Skies Technical Advice Note Version 2 and The Bat Conservation Trust guidance note 08/23, we recommend the following to mitigate adverse landscape effects in regard to external lighting in a countryside location:
 - a. 3000Kelvin or lower
 - b. 500 Lumens or below
 - c. Where appropriate, use of motion/proximity sensors and set to as short a possible a timer as a risk assessment will allow. For most purposes, a 1 or 2 minute timer is appropriate.
 - d. Horizontally mounted luminaires with no light output above 90° and/or no upward tilt.
30. Proposals indicate that the PRoW will be lit to make it suitable year round, however given the location within the Landscape fringe, in addition to point 28, this is recommended to be absent or restricted in order to avoid light intrusion in the rural location.