

# Proposed Development – North Warnham

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## *Objections to DC/25/1155*

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6 Freeman Road  
Warnham  
Horsham  
RH12 3RQ

**Disclaimer:** The observations/opinion presented in this document represent the opinion of the author.

This facts stated in this document represent the author's understanding at the time of writing.

The author reserves the right to amend & correct this document based on the review of additional information.

The author also reserves the right to re-submit prior to the planning committee meeting (to review the proposed development).

# Introduction

## Summary Of Objections

- 1. Site Boundaries
- 2. Highway Safety and Traffic
- 3. Flooding, Sewage and Drainage
- 4. Electricity Supply
- 5. Impact to Wildlife
- 6. Character of the Landscape and Village

# 1. Site Boundaries

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Site Boundary

- 1) There is an outstanding issue with the illustrated site boundary where a tree [T42] is correctly shown as being external to the site on the 'Arboricultural Impact Assessment and Preliminary Method Statement', is shown as internal to the development site on the master plan.
- 2) This was reported to Planning on 26/8/2025 and to Batcheller Monkhouse on the 28/8/2025 (with video evidence of the actual boundary). The issue remains unsolved.

Proposal

➤ The plan needs to be corrected before it proceeds further. – *Note, I am currently in contact with the agent on this matter. [11/9/25].*

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## 2. Highway Safety and Traffic

Overview

1. We already have issues with speeding traffic in Warnham and pets being hit by cars.
2. Warnham becomes a rat run during the morning and evening rush hours. The streets of Warnham are not suitable for the traffic flows at these times.
3. This new development will add to the rush hour chaos – since there's no significant employment and no secondary schools within walking distance.
4. Both roads proposed for access to the proposed development site are completely unsuitable for any new traffic. They are winding, narrow country lanes that suffer from potholes and cracking up.
5. People often walk along the proposed access road (off Knob Hill) with dogs to access the village green. Dogs are often off the lead. I have witnessed two near accidents with dogs running out onto the Knobs Hill highway.
6. Statistics on historic accidents don't reflect the near misses on the 'S' bend in Knob Hill where the access is proposed. The number of accidents is likely to grow exponentially by including a new access road on this 'S' bend.

## 2. Highway Safety and Traffic – Response to Transport Statement...

RSA

1. The Road Safety Audit report appears to have not been made available for public consultation and public scrutiny.
2. Proposed mitigations to four issues raised in the RSA (see appendices in Transport Statement) have not been signed off by the 'Overseeing Organisation' according to the transport statement.

Transport Statement

1. The transport statement seems to have been submitted after the start of the consultation period, despite being signed off on the 14/05/2025. It appears to have been made available after local transport / safety objections had been raised. (Subject to confirmation from HDC on submission timing).
2. The document calls for neighbouring driveways to be re-positioned. It appears that the owners of these driveways have not been consulted on this. The master plan doesn't seem to reflect this re-positioning work either.
3. Documented widths of the existing roads that adjoin the two proposed access roads don't seem to take into account the usable width during winter when a lot of the edges become undrivable due to water ingress, freeze-thaw cycles and inadequate edge support/drainage.
4. The first drawing referenced 2024-6645-002 shows large vehicles turning right into the new access road from Tillets Lane would have to encroach the left verge of Tillets Lane to avoid any cars waiting to turn right onto Tillets Lane from the new access road. The second drawing indicates that larger vehicles would have to encroach onto the same verge of Tillets lane when turning right onto Tillets Lane from the new access road – even with cutting across onto the wrong side of the access road itself. They would have to encroach a lot further than illustrated if there was a vehicle turning left from Tillets Lane into the new access road. All this encroachment onto the verge opposite the new access road will cause the **road to become very muddy and dangerous in wet weather** (at a time when the road cuts up badly at the edges anyway).
5. Drawing 2024-6645-101 seems to show that a car driving down Knob Hill would have a **restricted line of sight** due to long grass bordering the left-hand side of the road.
6. Drawing 2024-6645-102 shows the 'Inside Car' (waiting to turn right onto Knob Hill) being some distance away from the centre line of the access road. This is unrealistic. Any vehicle waiting to turn right from the new access road would be directly aligned with the centre line of the road. Larger (long wheelbase) vehicles wanting to turn left into the access road would have to sweep out to the right-hand edge of Knob Hill so that they can swing left into the new access road without hitting the car waiting to turn right from the access road. **Any vehicle coming down Knob Hill at the same time will be at significant risk of a head on collision with the vehicle trying to turn left into the access road (on the wrong side of the road).**

Proposal

I recommend WSCC consider rejecting this planning application since the proposed Knob Hill and Tillets Lane cannot be considered appropriate or safe for a sizable development like this.

### 3. Flooding, Sewers and Drainage

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#### Considerations

- The NDP and the applicant's flooding assessments both project an overly optimistic picture of flooding risk. For example, the 'Flood Risk and Drainage' report indicates a 'Low' risk level of ground water flooding. This would indicate a 1 in 30 chance of surface water flooding each year.
- The reality is **we get multiple surface water flooding events each and every year** from the site in question.
- The gardens of numbers 6 and 7 Freeman Road become flooded with the surface water pouring off the site that is now proposed for development. There is also a strong flow of water that runs down next to the school and a third flow that runs onto Lucas Road. These are presumably the three flows identified in the 'Flood Risk Drainage' report.
- There is a very strong risk that the water management of this site has been designed based on the 'Low' risk identified in the report and may therefore not be suitable for managing the actual surface water flooding that occurs multiple times each year.
- I am therefore concerned that the proposed attenuation basin just north of my back garden may not have an adequate capacity and may even cause new flood streams into my garden should it overflow.
- I am also concerned that there will be significantly more water entering the surface water sewers as we will no longer have the clay landscape to soak up a lot of the water. The surface water sewers in the village already become overwhelmed at three points in the village:
  - In Lucas Road – Which I believe directly relates to one of the three flood paths from the proposed development site.
  - By the bus stop in Church Road (next to the Sussex Oak and footpath going to the school).
  - At the bottom of Tillets Lane, on the junction with Friday Street.
- These roads become flooded after heavy rain which is very dangerous. This can only get worse with the proposed development – unless the new surface water drains are connected to an alternative surface water sewer (or the surface water sewer is upgraded across the village).

#### Proposal

- **Southern Water should be engaged to design a new sewer / drainage plan for the whole village – before any new housing is added which would make the existing problems worse.**

## 4. Electricity Supply

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- The main development field has overhead electricity pylons – close to the western and southern sides of the field. These pylons don't appear on the master plan from the applicant.
- This raises questions on:
  - Wayleaves / Easements – Whether UK Power Networks will have access rights impacting the proposed developments.
  - Whether any proposed developments are too close to the electricity cables. Ref: Electricity Safety, Quality and Continuity Regulations (ESQCR). This seems particularly relevant to the dwellings on the south of the map as the existing cables may be directly above the proposed buildings. (STC).
  - Whether there is any risk to health of people living nearby / under these electricity cables.
- My house (which adjoins the same field) is serviced from overground electricity cables and often trips out when there is an electric storm nearby (presumably due to power surges).

Considerations

- The applicant's agent should update their plans to reflect the position of the housing in relation to the existing electricity pylons and address questions raised above.
- UK Power Networks should be consulted to ensure that the overground power supply is suitable for the new development (and if not, what the scope of remedial work would be).

Proposal

## 5. Impact to Wildlife

Feedback from local wildlife expert (David Bridges) to applicant's agent

### David Bridges:

Worked for HDC & lead teams running:

- Southwater Country Park
- Warnham Nature Reserve

Was chief executive of Butterfly Conservation

Established Warnham Butterfly Fields.

Is the organiser of Wild About Warnham.

Organised a recent survey of Marsh Tits that will be published later this year.

"Unfortunately, your proposed development site, happens to be one of the best (if not the best) locations for a range of farmland birds within the parish.

The fields are regularly hunted over by Barn Owls and Kestrels; the hedges are used for breeding by Yellowhammers - a Red List bird - (and many other species); the development fields (and the two adjacent fields to the north) are occupied each winter by hundreds of finches and buntings. Species that winter in the fields include Yellowhammer, Linnet, Reed Bunting, Brambling, Chaffinch, Goldfinch, Bullfinch and Redpoll. The Linnet, another Red List species, occurs regularly in flocks of over 200 birds.

The development fields also support valuable populations of many butterfly species. Most notably the hedgerows where Blackthorn is present, support the Brown Hairstreak (UK Biodiversity Action Plan priority species/ Section 41 species of principal importance under the NERC Act in England). Other butterflies recorded in the fields include Brown Argus, Common Blue, Clouded Yellow, plus many common species.

The presence of these farmland birds and interesting butterflies is a good indicator of the wider biodiversity that is present in the fields. Many other taxa are trickier to identify, survey and record so using birds and butterflies as 'proxies' for more thorough biological recording, can be a handy way of gauging a site's wildlife value. However, other more obscure but rare/important species from other taxa have also been recorded. For example, this year we obtained evidence from a local resident that the Light Crimson Underwing is breeding on oak trees in Tillets Lane. This moth is a Red Data Book species and a priority species under the UK Biodiversity Action Plan.

Although the development site is relatively small, the impact of building and the new houses, will reach well beyond the actual built-up area. For example, the wonderful old hedge along the site's northern boundary will be impacted - even if it is retained. It is highly unlikely that the Yellowhammers that use it now will remain, as this bird will not tolerate the proximity of the housing and the inevitable disturbance this will bring. It is a farmland species not a bird of suburban gardens. It is also likely that many of the new homes will have cats, which will take a heavy toll of the wild bird population in the hedges and adjacent fields.

I am pleased the plans you exhibited include reference to provision for species such as Swifts, Great Crested Newts and Bats. However, I would suggest that to achieve anything like a 10 percent Biodiversity Net Gain, given the current importance of the development fields and the likely adverse effect of the proposed development on the local wildlife, far more measures to support biodiversity will have to be included in any planning application submitted to Horsham District Council by your clients.

For example, to mitigate the impact of the development on the over-wintering finches and buntings, alternative land should be allocated and maintained in perpetuity as replacement wildlife-rich habitat. One (or more) of the fields to the south of the Butterfly Fields might be suitable for this purpose if they can be taken out of the Ends Place farm tenancy. These fields would also provide some alternative habitat for breeding birds, foraging bats and for the butterflies and other invertebrates which will be lost if the development proceeds."

## 5. Impact to Wildlife – Continued...

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Sussex  
Ornithological  
Society

Review Highlights

Local Residents  
Observations

Proposal

- 70 species recorded in the 1km square containing the site in the past 10 years (2015-2024). Of these **13 are red listed** on the Birds of Conservation Concern (BOCC) (1) list and **19 are amber listed**. In addition, **13 species covered under Section 41 of the Natural Environment & Rural Communities (NERC) Act (2) were found**.
- The required full winter and breeding season bird survey has not been performed.
- The proposed arrangements whereby the local residents take over the ongoing management of the landscape elements after a 12-month period following completion may be over-optimistic.
- Large sections of the Landscape and Ecology Management Plan are incomplete, with large sections apparently pasted from a similar document regarding another site.

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- The proposed development site is teeming with wildlife and we don't yet understand the impact this development will have on critical species.
- There is an enormous amount of material to be reviewed in the reports that have been submitted with the application to determine the impact on key species. This requires an expert with local knowledge to be assigned to review all the material to understand the impact on key species like bats and newts etc.
- Linnet, Goldfinch, Yellowhammer, Song Thrush, Robins and Blackbirds nest in the hedge between the two fields that will disappear. We also see wild deer in this hedge from time to time looking after their young.
- Reed Bunting, Kestrel, Buzzard, Barn Owl, Tawny Owl, Red Kite, Magpie, Sparrowhawk are birds that all frequent the fields.
- There are also Slow Worms and Grass Snakes.
- Brown Hairstreak butterflies are present and breeding on the blackthorn in the hedges.
- There's a question on whether the habitat report was invalidated due to the damage that was caused to the survey mats and boxes (that were in the hedge rows).
- There's also a concern about whether the consultant used by HDC (LUC) has an appropriate level of local knowledge (given that the ecology review is essentially desktop assessment of the submitted reports and other material).

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- The agent needs to perform the required (Site-Specific) Breeding and Winter Birds survey.
- The agent should clarify the use of AI when authoring the Ecology Management Plan – *given the feedback from the SOS*.
- HDC should engage David Bridges to review the ecology report from the LUC consultant (acting for HDC) - *to ensure the proposals align with the knowledge and first-hand experience of our local wildlife expert*.

## 6. Character of the landscape and Village

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*Established hedgerow with mature trees that currently divides the two fields proposed for development.*



**Field 1:** Field above football pitch which is proposed for developed (with access from Knob Hill).

## 6. Character of the landscape and Village – Cont...

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**Field 2:** Second field proposed for development (with access from Tillets Lane)

## 6. Character of the landscape and Village – Cont...

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- Warnham is a traditional village which is defined by the character of its buildings (many of which are listed).
- The proposed development site is agricultural land that could be dedicated to food production.
- The character of the countryside surrounding Warnham will be changed forever by the proposed development of 59 modern dwellings on the fields shown here.



*View of the second field, looking along the proposed new northern border of Warnham village.*



*View from the top of Knob Hill looking over the top of Warnham to the South Downs and the hedgerow that will form the new northern border of Warnham.*

- Once the village boundary is moved, you have to question what the future holds for the other adjoining fields.
- The concern is that Warnham is likely to head in the same direction as small towns like Southwater.

*(but without the same infrastructure or highway network)*

Proposal

- Reject this planning application since new modern housing is not in keeping with a traditional, old village set in pristine, agricultural countryside that could be used for food production.

- Appendix: 1 – Construction Management Plan

# Appendix: 1 – Construction Management Plan

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- I am concerned about how site traffic would enter the development site.
- Low loaders (articulated lorries) will need to deliver JCB's and the like to the site.
- There may also be the need to deliver piles (20M+) - depending on the results of a geotechnical survey.
- I can't see how large articulated lorries could access the site in question or how they would turn around.

Proposal

➤ Perform an initial site access feasibility study that addresses:

- *Access routes to the site*
- *Turning points for large lorries*
- *On site constraints*
- *Alternative delivery strategies (if any)*