


11 Station Road
Warnham
Horsham
RH12 3SR

Planning Department
Horsham District Council
Parkside
Chart Way
Horsham
RH12 1RL

27 May 2026

Dear Planning Officer,

RE: Formal Objection to Planning Application DC/26/0585

Land North of Station Road, Warnham, West Sussex RH12 3SR

I wish to raise several concerns with this planning application and formally object to it being granted.

Local Development Framework & Strategic Context

The proposal represents a clear and unacceptable departure from the established scale and character of Station Road.

The site lies outside the built-up area boundary and is therefore within the countryside as defined by the Horsham District Planning Framework (HDPF).

Policies relating to countryside protection and settlement hierarchy (HDPF Policies 3, 25 and 26) seek to focus development within defined settlements and protect the character of the countryside.

The proposal would more than double the size of the existing settlement in a single phase, introducing a level of development that conflicts with this spatial strategy.

The application does not properly address:

- The cumulative impact of surrounding and emerging development,
- The relationship with neighbouring rural communities, and,
- The proximity to existing and consented industrial uses.

Instead, it relies on mitigation rather than demonstrating that the development is acceptable in principle, contrary to the core requirement for sustainable development set out in the NPPF.

Highway Safety & Traffic

HDPF Policy 40 requires development to be safely accessible and to promote sustainable transport.

The transport evidence submitted is not sufficiently robust to support compliance with this policy.

Notable issues with the supporting statements include:

- The inherent dangers presented by the existing junction, much of which is extremely challenging to mitigate due to spatial constraints, including:
 - Limited lines of site due to topology,
 - Significant volumes of existing traffic flows, and,
 - Speeds of vehicles on the A24 regularly exceeding the speed limit, sometimes very significantly.
- Accident data is limited and does not fully reflect the collisions known to occur at the junction between Station Road and the A24, including several of which have involved existing residents of Station Road,
- The proposed modifications to this junction do not address the main cause of incidents; rear end collisions whilst turning right from Northbound A24 into station road,
- The proposed modifications to this junction do not appear to present an appreciably safer means of pedestrians crossing the A24, indeed they note certain risks posed by the central refuge,
- The proposed modification including the central refuge will serve to impair visibility of Bell Road from Station Road,
- Traffic generation assumptions are simplified and not supported by detailed modelling, which among other factors should address the inevitably car dependent proposed development,
- Future traffic changes, including increased industrial activity, are not fully assessed, e.g. Britania Crest Wealden Works operating at c.20% permitted movements, CHER EfW plant likely to result in c.5,000 additional HGV movements per month,

- It fails to acknowledge that Station Road is a constrained rural road, with no pedestrian or cycle infrastructure, a situation that will be exacerbated as noted elsewhere in this letter.

The proposal therefore fails to demonstrate compliance with HDPF Policy 40 and national guidance within the NPPF relating to safe and suitable access.

Parking Provision & Assessment Deficiencies

HDPF Policy 41 requires development to provide adequate parking appropriate to its location; the proposal fails to do so.

The assessment of capacity availability and utilisation is flawed in that:

- It relies on capacity within “Local Road”; the only viable interpretation of which being the access road to the rear of the existing properties that will be lost or materially changed,
- It includes Mercer Road, which is entirely unsuitable for contribution to residential parking capacity for the community owing to:
 - Existing use for industrial purposes and the constraints due to associated vehicle movements, safety etc.,
 - The 2 mile round trip by car for access from the existing and proposed properties on Station Road,
 - The pedestrian rail crossing which is both unsafe for children and completely inaccessible to wheelchair or mobility scooter users.
- It does not reflect the constrained nature of Station Road, where existing capacity utilization regularly results in the requirement to reverse 50+ m,
- Existing parking pressures are understated within the data,
- Displacement of existing parking required for the proposed access is not addressed i.e around number 18, and,
- An inadequate provision of parking per property in the proposed scheme.

The likely result is overspill parking, reduced safety, and restricted access, directly conflicting with both Policy 41 and the broader objectives of Policy 40.

Restrictions to Existing Right of Access

Whilst the proposed development acknowledges the Right to Access of the existing properties, its proposed implementation fails to address the following practical constraints necessary for this right to be retained:

- The width of the proposed access should be adequate to allow for turning of vehicles into and out of the numerous garages at the rear of the properties,
- The width should also be sufficient to allow for a vehicle to pass another as the existing access affords,
- Access should be managed in such a way that it does not become part of the parking provision for the new development and/or Warnham Station, and,
- Access should be managed in such a way to ensure this does not become a thoroughfare.

Sustainability & Transport Strategy

HDPF Policy 40 and NPPF Section 9 require development to prioritise sustainable transport modes.

Despite of proximity to Warnham Station, the proposal is not sustainably located as a result of the following:

- The train service to the station is infrequent and of limited operational hours,
- There is no meaningful or safe walking or cycling infrastructure connecting the development with either Warnham Village, or Horsham, and,
- Busses are only accessible via the dangerous crossing of the A24.

The supporting Travel Plan relies on behavioural change rather than infrastructure, which is insufficient in a poorly connected rural location.

The development will, in practice, be car-dependent, in contradiction to the Policy objectives, and compounding the aforementioned issues with safe access and parking.

Environmental Impact & Ecology

The proposal conflicts with HDPF Policy 31 (Green Infrastructure and Biodiversity).

The application confirms that:

- Extensive habitat clearance will be required,
- The ecological impacts are assessed as High,
- The development results in a substantial on-site biodiversity loss, and,
- Net gain is only achieved through off-site mitigation.

This does not reflect the mitigation hierarchy required by the NPPF, which prioritises on-site retention and enhancement.

Impact of Existing Industrial Uses

HDPF Policy 24 (Environmental Protection) requires development to avoid unacceptable impacts from noise and disturbance.

The application fails to adequately address existing industrial uses, including Wienerberger operations.

Wienerberger have previously objected to nearby residential development (Mercer Road), citing:

- Noise emissions from their operations which operate up to 24/7,
- Air quality concerns, and,
- The need for significant mitigation in design of the development accordingly.

Those same conditions apply both within the proposed development, and the existing properties on Station Road, from which we already frequently experience:

- Noises emitted from Wienerberger facility at all hours of the day, commonly readily audible within the existing properties, through closed double glazing, including:
 - Banging of mechanical shovels loading processing plant,
 - Warning beacons / sirens associated with processing plant,
 - Mechanical and other noises from the operation of the conveyor transporting clay to the plant.
- Poor local air quality as a result of:
 - Airbourne dust and particulate from Wealden Works site in general,
 - Strong odours associated with the operation of the Brick Kilns,
 - Strong odours emitted from the Biffa waste processing facility and biodigester.

Despite the predominantly industrial nature of the immediate vicinity, the proposal:

- Does not demonstrate adequate or equivalent mitigation, and,
- Assumes compatibility without resolving identified constraints.

This represents a clear inconsistency and failure to properly consider the implications of adjacent industrial activity.

Impact of Proposed Energy from Waste Facility

The proximity of the proposed development to the consented Energy from Waste facility (CHER Waste Incinerator) is a critical issue.

Every property within the proposed development will form the new nearest sensitive receptors to this facility, the nearest of which c.200m from the EfW site boundary.

This raises obvious concerns regarding:

- Validity of the assessments, modelling etc. on which this development was approved,
- Impact of these facilities operations on the residents in the new properties,
- Concerns for the operational sustainability of the EfW facility with these new nearest sensitive receptors.

The proposed EfW facility is not mentioned in the supporting statements, and therefore we can only assume it has not been considered in their preparation and again calling into question their validity.

The Agent of Change Principle

The NPPF (paragraph 200) establishes the agent of change principle, requiring new development to manage the impact of existing uses on future occupants.

In no part does the proposal adequately assess:

- Cumulative noise, emissions, and operational impacts, or,
- Long-term residential amenity in proximity to major industrial infrastructure.

This raises a clear risk of future conflict and places inappropriate pressure on existing and consented industrial uses, therefore the proposal fails to demonstrate compliance with this principle.

The proposed development therefore can not thus far demonstrably comply with the Agent of Change principle.

Impact on Local Community

HDPF Policy 42 and NPPF Section 8 seek to create and sustain healthy, inclusive communities; the proposal would do the exact opposite.

Station Road operates in a unique way:

- The road itself is narrow and unsuitable for social use, and therefore,
- The informal green space to the rear of properties functions as the primary community space.

This space supports:

- Informal social interaction,
- Children's play, and,
- Day-to-day community life.

The proposal would remove this entirely.

This is not simply a loss of undeveloped land, but the removal of the functional centre of an established community.

As a result, the proposed development is contrary to both local and national planning objectives relating to community cohesion and wellbeing.

Infrastructure, Drainage & Ground Conditions

HDPF Policies 38 and 39 require development to ensure appropriate drainage and infrastructure capacity.

The application does not meet this standard in that:

- Impermeable surface area will increase significantly,
- Drainage solutions rely on unconfirmed infrastructure,
- Infiltration is not feasible due to ground conditions, and,
- Contamination risks are identified but unresolved.

These issues are deferred rather than resolved, which is inappropriate given their fundamental nature.

Quality and Reliability of Supporting Information

The NPPF requires decisions to be based on proportionate but robust evidence.

However, as has been identified throughout this letter, the multiple reports comprising the supporting statements:

- Rely on unverified data,
- Appear to seek to manipulate reality through strategic timing,
- Acknowledge their inherent limitations, and/or,
- Acknowledge a requirement for further investigation.

Despite this, firm conclusions are presented.

This undermines confidence in the overall submission.

Design & Character

HDPF Policy 32 requires development to respond to local character and context.

Whilst only an outline application, the proposal fails to do so.

The scale, density, and layout are not reflective of the rural setting and would fundamentally alter the character of Station Road.

Furthermore, it is inconceivable that a development on this site, of anywhere near to this scale, could ever do so.

Conclusion

The proposal:

- Conflicts with HDPF policies relating to countryside protection, design, transport, and environmental protection
- Fails to meet the overarching requirements of the NPPF for sustainable and appropriate development
- Relies on incomplete and unreliable evidence
- Does not adequately consider the impact of existing or proposed industrial uses
- Would result in the loss of a functioning community
- Would cause significant and demonstrable harm

I would respectfully urge the local authority to refuse planning permission.

Yours faithfully,

