

Land at Station Road, Warnham

Planning, Minerals and Sustainability Statement

Final

35211

April 2026



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1 INTRODUCTION

1.1 REPORT PURPOSE

1.1.1 This Planning Statement has been prepared on behalf of Wienerberger Ltd in support of an outline planning application with all matters reserved (except for access) for residential development of Land at Station Road, Warnham ('the Site').

1.1.2 The full description of development is as follows:

"Outline application for the erection of approximately 24 residential dwellings, with all matters reserved except for access."

1.1.3 The Applicant has previously undertaken Pre-Application discussions and a meeting with Horsham District Council (HDC) which culminated in a response dated 11th October 2024. Significant design changes to the scheme have taken place following the feedback received.

1.1.4 The site abuts built development and is unconstrained in terms of landscape designations. Its use can meaningfully assist in addressing the continuing housing shortfall in Horsham, including the delivery of much needed affordable housing.

1.1.5 This statement sets out relevant background for determination of the planning application, including a description of development of the Site and its surroundings, the relevant planning history and planning policies, details of the proposed development, and an assessment of the planning merits of the site.

1.1.6 The proposals have also been informed by the National Planning Policy Framework (2024 version), the Planning Practice Guidance, Horsham Local Plan, and the Warnham Neighbourhood Plan.

1.2 APPLICATION DOCUMENTS

1.2.1 This Planning Statement forms part of a suite of documents that support the planning application, and it is designed to be read in conjunction with the plans and documents listed in 1.2.

DOCUMENTS	AUTHOR
Design and Access Statement	Wienerberger
Suite of Plans	Wienerberger
Energy Statement	NuPlanet

TABLE 1.1

PLAN	REFERENCE
Air Quality Report	Quantum Air
Transport Statement	Mode Transport
Travel Plan	Mode Transport
Arboricultural Impact Assessment	Ecosurv
Ecological Impact Assessment	Ecosurv
Contamination Report	Ashdown Site Investigation
BNG Metric Assessment	Ecosurv
Noise Report	Quantum Acoustics

TABLE 1.2

2 THE SITE

2.1 SITE AND SURROUNDS

- 2.1.1 The application site is situated within the administrative boundary of HDC and lies outside the defined built-up area boundary.
- 2.1.2 The site is positioned immediately to the west of Warnham Station and to the north of Station Road. To the south of the site, there is an established residential area comprising 18 two-storey semi-detached Edwardian dwellings. These properties feature long, narrow rear gardens that directly abut the southern boundary of the application site.
- 2.1.3 The applicant's ownership extends an area measuring approximately 7.6 hectares. However, the proposed development pertains to a 0.88 hectare portion of this land, delineated in red on the figure below.
- 2.1.4 Weinberger Ltd also owns the brick manufacturing facility located to the northeast of Warnham Station.



FIGURE 2.1 SITE LOCATION (RED) AND WIDER SITE OWNERSHIP (BLUE)

- 2.1.5 The site is varied in character and land use. It is understood that the wider site (including land beyond the proposed red line site boundary) was formerly an earthworks, and whilst much of it is now wooded. Along the eastern boundary of the site, there is land which includes commercial uses, including a steel-framed

building used as a bus garage/ workshop with associated office and bus parking facilities.

- 2.1.6 However, the land contained within the red line for the majority comprises open historic agricultural land containing animal enclosures and relic agricultural machinery, associated with informal uses, which have established over time, and smallholding agricultural activities.
- 2.1.7 There are a number of other structures within the southern part of the site.

Access

- 2.1.8 Vehicular and pedestrian access to the site is from the existing entrance off Station Road, situated to the east of the existing residential dwellings. This existing access point serves the commercial yard and also provides access to the residential garages to the rear of the residential properties along Station Road.

Surrounding Area

- 2.1.9 The North of Horsham Strategic Site is also located to the east of Warnham Train Station and is a consented development for 2,750 homes. This site will also deliver substantial community infrastructure, including a secondary school, two primary schools, a business park, a local centre, open space, supporting infrastructure and a potential new railway station (Please refer to section 3 for more detail).
- 2.1.10 The site is approximately a 20 minute walk or a 5 minute cycle from Warnham village and is approximately a 10-minute drive from the centre of Horsham. The village of Warnham contains public facilities such as local pubs (The Sussex Oak, a school (Warnham C Of E Primary School) and other local facilities.
- 2.1.11 Warnham Station is approximately 50m to the east of the site and has hourly trains into London Vitoria alongside hourly trains to Horsham. From Horsham, there are twice-hourly trains to London Victoria, Peterborough, Portsmouth Harbour, Bognor Regis, Portsmouth & Southsea.
- 2.1.12 A Public Right of Way (Ref: WAR-1574) also runs along Station Road and connects with Mercer Road to the east, and Dorking Road to the west providing further opportunities for sustainable and active travel (see blue line below in Figure 2).

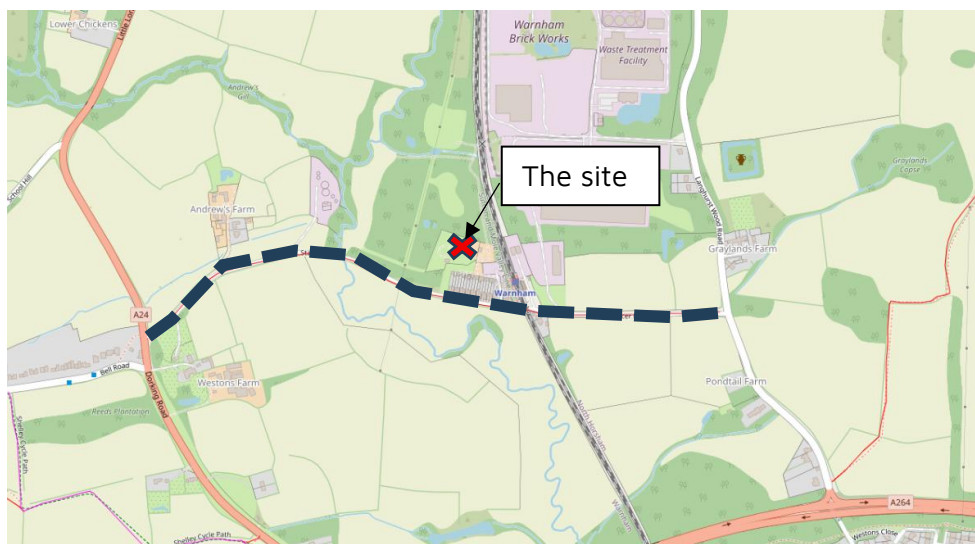


FIGURE 2.2 PROW MAP

- 2.1.13 The site is located approximately 300 metres west of a further residential allocation currently subject to a live planning application (Ref: DC/25/0151) proposing 304 dwellings, public open space and a retail unit.

2.2 SITE SPECIFIC CONSIDERATIONS

Flood Risk

- 2.2.1 The site is situated within Flood Zone 1, indicating the lowest probability of flooding. Additionally, there is no identified risk of surface water flooding under current or future climate scenarios.



FIGURE 2.3 ENVIRONMENTAL AGENCY MAP (2026)

Ancient Woodland

- 2.2.2 The wider landholding includes pockets of ancient woodland, located at the northernmost extent of the ownership boundary. The proposed development area lies outside the designated buffer zone, ensuring no direct impact on the ancient woodland.



FIGURE 2.4 MAGIC MAP (2026)

Heritage

- 2.2.3 Weston Farm, a Grade II listed building, is the closest designated heritage asset, located approximately 520 metres to the southwest of the site. Owing to the presence of substantial natural screening, including dense vegetation, mature trees, and existing residential development, the proposed scheme would not materially affect views to or from the asset.

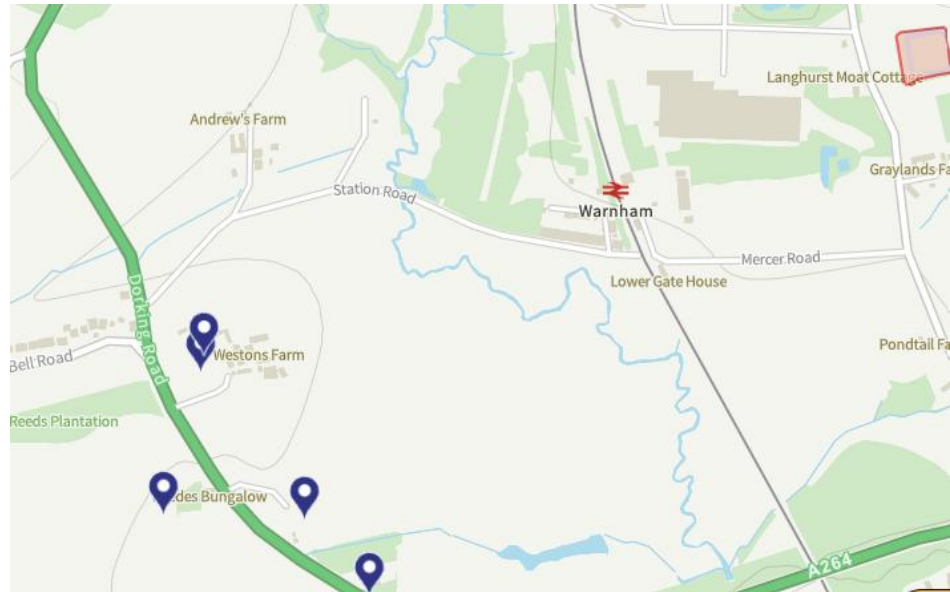


FIGURE 3 HISTORIC ENGLAND MAP (2026)

3 PLANNING HISTORY

3.1 PLANNING HISTORY SEARCH

- 3.1.1 A desk-based search of the HDC online planning register provides limited relevant planning history for the site.

3.2 PRE-APPLICATION ADVICE

- 3.2.1 As encouraged by the National Planning Policy Framework (paragraph 39), a pre-application advice request was submitted to HDC in October 2024 (ref PE/24/0146), where a scheme was presented for the development of 22 dwellings with associated car parking and private garden space, and new access off Station Road.



FIGURE 3.1 INITIAL SITE LAYOUT PLAN PRESENTED AT PRE-APP

- 3.2.2 Pre-Application written advice was obtained on the 11th October 2024. Overall, the planning officer acknowledged the lack of 5 year housing supply and confirmed that the presumption of development would apply. Outside of the above the following comments have been made:

- *Ensure that neighbourhood amenity regarding noise, visual impact and traffic impacts are kept to a minimum, including throughout the construction phase.*
- *Highways, traffic and Access: ensure that the development provides adequate off-road parking, good pedestrian and cycle connections, storage for cycles.*
- *Ecology: the site has the potential to be used as habitat and a connector for various species. It is also noted that the site is located within the Red Impact Risk Zone for Great Crested Newts, which is considered to be a suitable habitat with a high likelihood of Great Crested Newts being present.*
- *A mandatory 10% increase in Biodiversity Net Gain, new emerging plan includes a policy requiring 12% net gain.*
- *The application site is located within Flood Zone 1, and from the EA mapping, it appears to be located outside of any risk of surface water flooding as well. Accordingly, a Drainage Strategy is required, which includes details of how surface water and foul water will be managed and how flood risk will not be increased on or off-site.*
- *We encourage the surface water strategy explores the 4 pillars of SuDS which include amenity, water quality, water quantity and biodiversity.*
- *Any submission should include details of how energy efficiency and climate change has been considered within the design, including layout and orientation, energy sources, building and finishing materials, SuDS and biodiversity.*
- *Officer states that while the proposal would not meet the criteria for consultation with the Active Travel England, any application is still required to address active travel requirements and promote sustainable transport.*
- *Alongside any application an Air Quality Assessment (supported by an Air Quality Emissions Mitigation Plan) must be submitted.*
- *The application site is located within a Minerals Safeguarding Area (as defined in the WSCC Joint Minerals Local Plan (JMLP), 2018) for Brick Clay and Building Stone. As required by the West Sussex Joint Minerals Local Plan (2021) a Minerals Resource Assessment should be submitted to identify whether economically viable mineral resources are present on site, and whether prior extraction is practicable.*

3.2.3 Overall the planning officer determined that while the housing site is contrary to the development plan, being located outside and away from the built-up area boundary; the benefits of the proposal and the lack of harm attributed to the

scheme would be given weight in the planning balance and the determination of the application due to HDC not having a five-year housing land supply.

3.3 OTHER RELEVANT PLANNING APPLICATIONS

Land North of Horsham



FIGURE 3.2 DC/16/1677 PROPOSED DEVELOPMENT PLAN

- 3.3.1 As shown in Figure 3.2 above, the allocation boundary of Land North of Horsham (SD1) is located approximately 500 metres to the west of this site and benefits from outline planning permission (Application DC/16/1677) for a mixed use strategic development comprising 2750 dwellings, a business park, retail, community centre, leisure facilities, educational facilities and public open space.
- 3.3.2 This application was approved in March 2018, and applications for the Reserved Matters (RMs) are still progressing.
- 3.3.3 Overall, the allocation seeks to deliver:
 - 46,450 m2 (500,000 ft2) business park;
 - Two primary schools;
 - A secondary school;

- Provision for special educational needs;
- Local centres and community facilities;
- Retail provision of 4,900 m² (52,744 ft²)
- Multi-use community centre.
- New cycle and pedestrian improvements.

Land to the North and South of Mercer Road



FIGURE 3.3 PROPOSED SITE PLAN

- 3.3.4 Land at Mercer Road is also located approximately 300 metres west of the site and lies adjacent to Land North of Horsham (see the blue-shaded land above). This land was identified as a potential site allocation in HDC's SHELAA 2023 and is currently proposed for allocation in the emerging Local Plan for 300 units (HOR2).

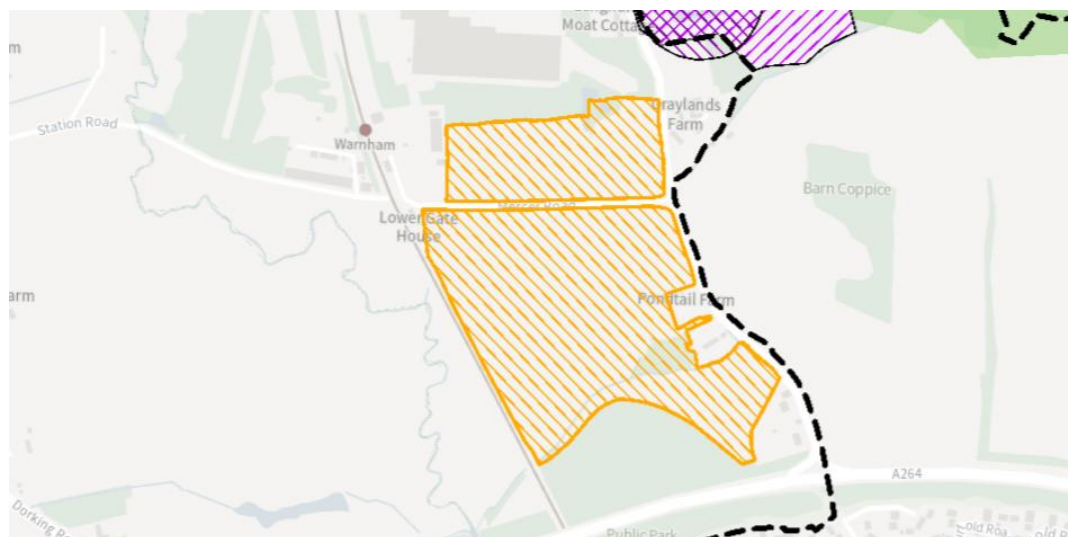


FIGURE 3.4 EMERGING LOCAL PLAN POLICIES MAP

- 3.3.5 A planning application for the site was also submitted in 2025 (Ref: DC/25/0151), proposing 304 dwellings, public open space, and a retail unit. The application was submitted on 27 March 2025 and is currently awaiting determination. The proposals also includes for play areas, and a diverted PROW.

4 PLANNING POLICY FRAMEWORK

4.1 INTRODUCTION

- 4.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise.
- 4.1.2 In this respect, the statutory development plan for HDC consists of the Horsham District Planning Framework adopted November 2015.
- 4.1.3 Other material considerations include the National Planning Policy Framework ('NPPF') (revised December 2024), the National Planning Policy Guidance ('NPPG'), and supplementary planning documents and guidance, including the Warnham Neighbourhood Plan (2017-2031).
- 4.1.4 It should be noted that the adopted Horsham District Planning Framework is currently out of date by reason of it being over 5 years old. The Government require all Local Authorities to review the Local Plan every five years, and therefore the Council are currently in the midst of preparing a new Local Plan for the District.
- 4.1.5 The draft Horsham District Local Plan (2023-2040) was submitted to the Planning Inspectorate on 26 July 2024. After submission, the Planning Inspector raised concerns regarding legal compliance, soundness, and the Duty to Co-operate, resulting in the scheduled 2025 hearings being cancelled.
- 4.1.6 In February 2026, HDC announced that the Local Plan examination would be re-opened following the removal of the District's water neutrality and Duty to Co-operate issues. The examination is expected to begin in late April 2026. Given the stage of the emerging Local Plan, it is considered to carry some weight in determining of this application.

4.2 THE DEVELOPMENT PLAN

Horsham District Planning Framework

- 4.2.1 The HDPF provides the strategic direction for the Horsham District, providing policies to guide decisions on planning applications. The Local Plan Update was adopted by the Council in November 2015.
- 4.2.2 The following policies from the Local Plan are considered relevant to this application.

POLICY	DESCRIPTION
Policy 1	Strategic Policy: Sustainable Development
Policy 2	Strategic Policy: Strategic Development
Policy 3	Strategic Policy: Development Hierarchy
Policy 4	Strategic Policy: Settlement Expansion
Policy 9	Employment Development
Policy 15	Strategic Policy: Housing Provision
Policy 16	Strategic Policy: Meeting Local Housing Needs
Policy 24	Strategic Policy: Environmental Protection
Policy 25	Strategic Policy: The Natural Environment and Landscape Character
Policy 26	Strategic Policy: Countryside Protection
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
Policy 42	Strategic Policy: Inclusive Communities

4.3 OTHER MATERIAL CONSIDERATIONS

Warnham Neighbourhood Plan (2017-2031) Adopted

- 4.3.1 The following policies from the Neighbourhood Plan are considered relevant to this application.

POLICY	DESCRIPTION
Policy W1	Built-Up Boundary
Policy W2	Scale of Housing Provision
Policy W3	Housing mix – meeting local needs
Policy W4	Dwellings appropriate for the needs of older people
Policy W5	Design of residential development

National Planning Policy Framework 2024

- 4.3.2 The NPPF 2024 is a material consideration which carries significant weight since it sets out national planning policy. The NPPF as a whole is relevant to the application, but the following sections are particularly relevant:
- 4.3.3 **Section 2** outlines that plans and decisions should apply a presumption in favour of sustainable development. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways; economic, social and environmental.
- 4.3.4 Footnote 7 confirms that the presumption is not engaged for land designated as Green Belt.
- 4.3.5 **Paragraph 48** states that applications should be determined in accordance with the development plan unless material considerations indicate otherwise.
- 4.3.6 **Paragraph 61** states that in order to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed.
- 4.3.7 **Paragraph 78** says local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies³⁸, or against their local housing need where the strategic policies are more than five years old³⁹.
- 4.3.8 **Paragraph 105** states that decisions should protect and enhance public rights of way and access.
- 4.3.9 **Paragraph 124** states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land⁴⁹.
- 4.3.10 **Section 9** concerns the promotion of sustainable transport. **Paragraph 116** states development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.
- 4.3.11 **Paragraph 129** states that development should be supported that makes an efficient use of land. Decisions should take into account: a) the identified need for different types of housing and other forms of development; b) local market conditions and viability; c) the availability and capacity of infrastructure and

services; d) the desirability of maintaining an area's character and setting, and e) the importance of securing well-designed, attractive and healthy places.

- 4.3.12 **Section 12** sets out policies that work towards achieving well-designed places.
- 4.3.13 **Section 15** sets out policies conserving and enhancing the natural environment. **Paragraph 187 b)** states that recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- 4.3.14 **Paragraph 193 c)** sets out the when determining planning application, local planning authorities should, for development resulting in the loss or deterioration of irreplaceable habitats, (such as ancient woodland and ancient or veteran trees) be refused, unless there are wholly exceptional reasons⁷⁰ and a suitable compensation strategy exists; and
- 4.3.15 **Paragraph 196** states planning decisions should ensure a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination.

4.4 RELEVANT SUPPLEMENTARY DOCUMENTS

- 4.4.1 HDC produced in September 2025 the Shaping Development in Horsham District (SDPAN) document, which sets out the Council's aspirations and the weight that can be given to current policy.
- 4.4.2 This document sets out that NPPF Paragraph 11 d):

"Plans and decisions should apply a presumption in favour of sustainable development...

For decision-taking this means: ...

d) where there are no relevant development plan policies, or the policies which are most important for determining the application out-of-date⁸, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed⁷; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken 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 combination⁹

- 4.4.3 Is a key material consideration for housing applications as Horsham District in the absence of a five-year housing land supply and/or where Housing Delivery Test performance is less than 75%. Further stating that *"policies that affect that supply of housing may be considered out-of-date"* and therefore *"this has the effect of reducing the weight that may be afforded to such policies and engages the 'tilted balance' where there is an expectation that planning applications for housing should be approved"*.

4.5 HOUSING LAND SUPPLY

- 4.5.1 The Standard Method identifies Horsham District's local housing need (as at December 2025) as 1,338 dwellings per annum, equating to a total requirement of 6,690 dwellings over the five-year period from 1 April 2025 to 31 March 2030.
- 4.5.2 This figure is substantially higher than the housing requirement set out in the adopted Horsham District Planning Framework (November 2015). Policy 15 of the HDPF makes provision for at least 16,000 homes over the period 2011–2031, equivalent to an average of 800 dwellings per annum, and is therefore significantly out of date when assessed against current national methodology.
- 4.5.3 Furthermore, the HDC Authority Monitoring Report covering April 2024 to March 2025 confirms that the Council achieved only 62% against the Housing Delivery Test. As a result, a 20% buffer is applied to the five-year housing requirement. This increases the total five-year target to 8,028 dwellings, against which the Council can demonstrate only 1.7 years of deliverable housing land supply.

4.6 COMMUNITY INFRASTRUCTURE LEVY (CIL)

- 4.6.1 The Community Infrastructure Levy liability will apply to this outline consent. The CIL Rate for chargeable developments for this year is £188.81/m².

4.7 EMERGING POLICIES

Emerging Local Plan 2023-2040 (Regulation 19)

- 4.7.1 The Horsham District Local Plan 2023-2040 sets out planning policies and proposals to guide development in the district, excluding the South Downs National Park, up to 2040.

- 4.7.2 At present, albeit the Local Plan examination is being re-opened this year, there is still a degree of uncertainty regarding the status of the emerging Local Plan policies in light of the recent updates.
- 4.7.3 Given the likely modifications required to the Plan's strategic policies, only limited weight can be afforded to them at this stage. Accordingly, a detailed assessment of the Plan has not been undertaken within this Statement. Where specific policies are considered to carry some weight, these have been referenced as appropriate.

Draft NPPF 2025

- 4.7.4 In December 2025, there was the release of a new draft NPPF, which introduced a new emerging policy for public consultation. Specifically for the site, the draft NPPF introduces a significantly more pro-growth, rules-based approach, with a strong new emphasis on unlocking land within walking distance of well-connected railway stations for housing development.
- 4.7.5 Planning applications for homes located close to **well-connected train stations will receive a default presumption in favour of approval, provided they meet specified criteria.** Developments around stations—particularly those with high service frequencies and connectivity to jobs and services—benefit from a more “tilted balance,” meaning planning harms would need to substantially outweigh benefits to justify refusal.
- 4.7.6 The draft NPPF encourages higher-density housing near well-connected stations to reduce car dependency and support the creation of walkable, sustainable communities.

5 PROPOSED DEVELOPMENT

5.1.1 The full description of development is as follows:

"Outline application for the erection of approximately 24 residential dwellings, with all matters reserved except for access."

5.1.2 This section provides a summary of the development. Matters relating to appearance, landscaping, layout and scale are to be the subject of a future reserved matters application.

5.2 ILLUSTRATIVE LAYOUT VISION

5.2.1 The application is supported by an Illustrative layout plan, which is shown below, and a detailed Design and Access Statement (DAS) prepared by Wienerberger.



FIGURE 5.1 ILLUSTRATIVE MASTERPLAN

- 5.2.2 The DAS sets out the site constraints and explains how these have influenced the design evolution/concept. The design has been influenced by nearby woodland and therefore is driven by a landscape-led approach, which has informed the above illustrative site layout.
- 5.2.3 The application relates to a site measuring approximately 0.88 hectares and seeks permission for the residential development of around 24 dwellings. The density is currently 27 dwellings per Ha.
- 5.2.4 In summary, the proposals comprise the following elements which will deliver several benefits, namely:
- Provision of up to 24 homes in a mix of housing, on a site which is both available and deliverable now, making a valuable contribution to the need for new housing in the District (against a backdrop of a 1.7 housing land supply position);
 - Provision of 35% affordable provision in a mix of rented and shared ownership tenures;
 - Off-site highway improvements;
 - Provision of a Biodiversity Net Gain (BNG) in excess of 10%; and
 - Provision of economic benefits in relation to the construction of the Site and longer-term local spending and jobs.

5.3 HIGHWAYS AND ACCESS

- 5.3.1 Access to the site is a detailed matter in this Outline Application.
- 5.3.2 Vehicular access is proposed via a new junction onto Station Road, designed in accordance with relevant highways standards. The proposed access strategy ensures safe ingress and egress for vehicles, pedestrians and cyclists, with appropriate visibility splays and capacity to accommodate predicted traffic flows associated with the development.
- 5.3.3 Internal circulation has been designed to ensure clear and legible movement across the site, incorporating dedicated pedestrian footways and shared surface areas that encourage walkability and prioritise sustainable, non-car modes of travel where appropriate.
- 5.3.4 Vehicle and cycle parking will be in accordance with WSCC parking standards.

6 PLANNING CONSIDERATIONS

6.1 INTRODUCTION

- 6.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires applications for planning permissions to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 6.1.2 It is necessary to consider whether the application proposal accords with the statutory Development Plan and, if not, whether any material considerations indicate that planning permission should nevertheless be granted.
- 6.1.3 The following planning policy considerations are assessed in this section in relation to the proposal:
- Principle of Development;
 - Housing Mix;
 - Design Considerations;
 - Landscaping;
 - Residential Amenity;
 - Transport;
 - Ecology;
 - Trees;
 - Minerals;
 - Air Quality; and
 - Contamination.

6.2 PRINCIPLE OF DEVELOPMENT

- 6.2.1 Whilst the site is located outside of a defined BUAB it sits within a sustainable location, subject to significant committed and emerging growth. As demonstrated within this Statement, the site currently benefits from immediate proximity to Warnham train station, plus the strategic allocation Land North of Horsham 500m to the east, which will deliver enhanced active travel connections and public facilities near to the site. New facilities due to come forward comprise of a school, play areas and other community facilities. The site is also within walking and cycling distance to Warnham village to the west.
- 6.2.2 Policy 2 of the HDPF sets out the main growth strategy, focusing development in the Horsham settlement and continuing to support in principle the sustainable development of settlements through an appropriate scale of developments, which retains the existing settlement pattern over the plan period.
- 6.2.3 As it currently stands, the Local Plan is significantly out of date. In the absence of an up-to-date Development Plan, the presumption in favour of sustainable development is engaged (paragraph 11d). For decision-taking this means that

where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, planning permission should be granted unless:

- i) The application of policies in this Framework that protect area or assets of particular importance provides a clear reason for refusing the development proposed; or
- ii) Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole

- 6.2.4 Based on this scenario, in accordance with the latest published housing supply position in February 2025, HDC are currently only able to demonstrate a 1.7 years supply of housing (including the 20% buffer). In addition, the Council has failed its most recent Housing Delivery Test. An updated Housing Delivery Test was published in December 2024 and demonstrates that HDC only delivered 62% of its housing target. As a result, paragraph 11d(ii) of the NPPF is engaged.
- 6.2.5 The application is supported by a comprehensive suite of technical reports assessing the potential impacts of the development on the environment, landscape, and recreational opportunities, as well as the proposed mitigation measures. The scheme aligns with both national and local planning policies and delivers a range of public benefits as detailed in this statement.
- 6.2.6 Given that there are no significant adverse impacts that would outweigh the benefits of delivering 24 new homes on this site, planning permission should be supported. Moreover, the planning officer within the pre-application advice received confirmed that the provision of housing on this site would attract positive weight in the overall planning balance.
- 6.2.7 It is therefore clear that the Council's inability to demonstrate a five-year housing land supply and its failure to meet the housing delivery test trigger the presumption under Paragraph 11 and the application of the tilted balance. The proposed development of up to 24no. dwellings would make a significant and valuable contribution towards meeting the district's significant housing need and weighs heavily in favour of approving the application upon application of the tilted balance.

Sustainability and Shaping Development in Horsham

- 6.2.8 The NPPF is clear that the purpose of the planning system is to contribute towards achieving sustainable development. This means meeting the present day needs without compromising the future. NPPF paragraph 8 further expands on this by defining the three overarching sustainable development objectives – economic, social and environmental.

- 6.2.9 Given HDC's inability to demonstrate a 5-year housing supply of deliverable housing sites and in recognition of the key objective of Government policy to significantly boost the supply of homes, the Council adopted a FAD document in October 2022, which has subsequently been superseded by the technical note, Shaping Development in Horsham (SDIH) (2025). This forms a material planning consideration in decision making.
- 6.2.10 The SDIH Technical Note recognises that the Council is likely to receive applications outside of defined BUAB and on unallocated sites given its poor housing land supply position. This note confirms that applications which meet all the following criteria will be positively considered where all of the following are met:
- *The site adjoins the existing settlement edge as defined by the BUAB.*
 - *The level of expansion is appropriate to the scale and function of the settlement the proposal relates to;*
 - *The proposal demonstrates that it meets local housing needs or will assist the retention and enhancement of community facilities and services.*
 - *The impact of the development individually or cumulatively does not prejudice comprehensive long-term development; and*
 - *The development is contained within an existing defensible boundary and the landscape character features are maintained and enhanced."*
- 6.2.11 Whilst the application site doesn't directly adjoin the BUAB of Horsham or Warnham, it is clearly evident that it is well located in terms of access to local facilities within walking and cycling distance. The location and quantum of development proposed is clearly commensurate with the scale and infrastructure provision of Warnham and Horsham. The site also sits within the confines of other built development including residential housing.
- 6.2.12 As demonstrated throughout this Statement, the key sustainability aspects for the site are as follows:
- *The site is considered sustainably located give its location 50m to the west of Warnham Train Station, which offers considerable benefits in terms of sustainable transport connectivity. Warnham Station itself has hourly trains into London Vitoria alongside hourly trains to Horsham. From Horsham, there are twice-hourly trains to London Victoria, Peterborough, Portsmouth Harbour, Bognor Regis, Portsmouth & Southsea.*
 - *The site is also approximately 20 minutes walking distance (1.5 km away) or a 5 minute cycle from Warnham, which contains local pubs (The Sussex Oak), Warnham C Of E Primary School and a village store.*

- *The site is located approximately 500 metres west of the strategic allocation Land North of Horsham (SD1) and other identified development sites through the emerging Local Plan such as Land at Mercer Road (HOR2) (Ref: DC/25/0151).*

- 6.2.13 Taken together, the factors outlined above clearly demonstrate that the site occupies a sustainable and well-connected location, appropriate for accommodating new residential development.
- 6.2.14 With regard to the remaining criteria of the SDIH 2025, the proposed development would be well contained by the existing defensible woodland boundary to the north and west together with the road network and surrounding residential areas to the east and south. The proposed landscape strategy would reinforce and enhance these boundaries, ensuring the site is appropriately contained within the wider landscape.
- 6.2.15 Development of the site would not, either individually or cumulatively, prejudice the comprehensive long-term development of Warnham.
- 6.2.16 In light of the above, the proposed development accords with the objectives of the SDIH Technical Note. The site is clearly located in a sustainable position and would constitute sustainable development in accordance with the NPPF.

Principle of Development Conclusion

- 6.2.17 Overall, as demonstrated above, the absence of a 5YHLS means the conflict with HDPF Policies 4 and 26 is significantly diminished and the weight afforded these policies appropriately reduced as a result. The tilted balance (NPPF Para 11d) towards a presumption in favour of sustainable development is engaged and the provision of up to 24 houses weighs heavily in favour of approval (as confirmed within the Pre-Application advice received).
- 6.2.18 Further, the proposed development is sustainable. As such, the principle of development on the site is acceptable, subject to the detailed considerations as set out below to any site-specific constraints, and any other policy compliance, conflict and harm.

6.3 HOUSING MIX

- 6.3.1 Whilst the application is an outline application with all matters reserved apart from access, the proposals have been submitted with an illustrative layout plan, setting out how development on the site can achieve the proposed quantum of housing whilst adhering to the principles set out in the relevant policies.
- 6.3.2 NPPF paragraph 63 explains that the size, type and tenure of housing needed for different groups of the community should be assessed and reflected in policies. It

is recognised that HDC's most recently published SHMA (published 2019) identifies the following housing mix needs in Horsham:

DWELLING TYPE	OVERALL UNIT MIX	
	SHMA %	Proposed %
1 bed	22	17
2 bed	33	42
3 bed	30	33
4 bed	15	8

- 6.3.3 It is acknowledged that the proposed mix does not precisely match the mix published in the SHMA. However, both adopted and emerging local policy identifies that in applying the mix to individual development sites, regard should be had to the nature of the site and the character of the area. Furthermore, Policy W3 of the WNDP is clear that development proposals must contribute to meeting housing needs of Warnham parish and details housing mix distributions with the majority at 2-bed, followed by 3-bed.
- 6.3.4 Overall, the proposals are considered to offer a good balance of houses suitable for local need. Full details will be provided within the Reserved Matters applications and utilise the most up to date information to ensure the right mix comes forward.
- 6.3.5 Policy 16 of the HDPF also requires that major development schemes provide a minimum 35% affordable housing, with 70% of such housing to comprise Affordable Rent and the remaining 30% intermediate housing.
- 6.3.6 The proposals seek to provide policy compliant affordable provision.

6.4 INDICATIVE LAYOUT AND DESIGN CONSIDERATIONS

- 6.4.1 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.
- 6.4.2 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.
- 6.4.3 The application is seeking outline planning permission for up to 24 dwellings. Access will be a detailed consideration as part of the application. Appearance, landscaping, layout and scale are reserved and will be considered in a subsequent Reserved Matters Application.

- 6.4.4 The DAS confirms that the proposed development would be of a very high quality and reflects the nature of development in the surrounding area including recent developments that have been permitted nearby.
- 6.4.5 A mix of semi-detached dwellings with some flatted units will help to create a development that is cohesive but also varied and interesting in appearance. The proposed appearance of the dwellings responds positively to the surrounding context of the site with materials to be approved at reserved matters stage.
- 6.4.6 The overall density of the development is considered entirely appropriate for this semi-rural location.
- 6.4.7 Overall the submitted information demonstrates that the design, layout and appearance of the scheme is of a very high quality, reflects the character and appearance of the surrounding area and is appropriate for this location. As such the proposed development accords with relevant national and local policies.

6.5 LANDSCAPING

- 6.5.1 Whilst reserved for later consideration, the application includes a landscaping plan which sets out how a landscape-led scheme can be delivered at the site.
- 6.5.2 Strategic Policy 25 of the HDPF seeks to protect the natural environment and landscape character of the District including landscape, landform, and development pattern from inappropriate development; and Strategic Policy 26 seeks to protect and/or enhance the key features and characteristics of the landscape character in locations outside of BUAB.
- 6.5.3 The Landscape Strategy has been carefully developed to respond sensitively to the sites rural setting and to integrate the scheme within the existing site context. The proposals provide a sufficient level of open space provision that is suitable for this site and its countryside location.
- 6.5.4 The site is currently bounded by established hedgerows and mature trees, with woodland to the north and west, and existing residential development to the south. A key objective of the landscape approach is to retain and enhance these natural features, using them to structure the development and reinforce local landscape character. A suitable landscape buffer is also maintained from the woodland edge to the north and west of the proposed properties.
- 6.5.5 The proposals include new tree and shrub planting within the site to create tree lined streets. Approximately 2,263.3 m² of public open space is proposed, exceeding the minimum area recommended in the Open Space, Sports, and Recreation Review 2021, which is 0.2 ha.
- 6.5.6 Amenity and natural green space is proposed which is considered appropriate for the site's semi-rural location and scale. The proposed dwellings also benefit from

private rear gardens that are well sized and positioned to provide usable outdoor space for future residents.

- 6.5.7 The landscape design ensures that development edges are visually contained and filtered from surrounding views, minimising any adverse visual impacts.

6.6 RESIDENTIAL AMENITY AND NOISE

- 6.6.1 Policy 33 of the HDPF emphasises that new development should consider the scale, massing and orientation of buildings, ensuring that it respects the amenity of existing neighbouring occupiers. This includes minimising potential impacts such as overlooking, overbearing presence, and loss of privacy or daylight. This principle has been embedded into the design approach for the proposed development.
- 6.6.2 As shown on the submitted illustrative site layout, the scheme has been carefully arranged to ensure appropriate separation between new dwellings and surrounding properties, particularly those to the south of the site along Station Road. The illustrative layout achieves separation distances in excess of 20m between new homes and existing properties.
- 6.6.3 Retained tree planting to the eastern site boundary will further reduce the potential for overlooking and noise between the site and the railway line.
- 6.6.4 A Noise Assessment has been produced by Quantum Acoustics and submitted in support of this application.
- 6.6.5 The overall illustrative layout demonstrates strong regard to existing residential amenity, with a considered use of boundary landscaping, sensitive positioning of buildings, and the retention of trees where possible to the north and west providing further visual buffering between existing development and the new homes.
- 6.6.6 In conclusion, the proposed development has been designed to uphold high standards of amenity for both existing and future residents. The design achieves a balance of privacy, outlook and usable amenity space, and is considered to fully comply with the requirements of Policy 33 of the HDPF.

6.7 TRANSPORT AND ACCESS

- 6.7.1 A Transport Assessment and Travel Plan has been prepared by Mode Transport and submitted to support the outline application. Site access is the only matter covered in detail as part of this outline application. The TA has been informed and prepared in accordance with the guidance provided by WSCC at pre-application stage.

- 6.7.2 The proposed development will be accessed via a new junction from Station Road, designed in accordance with West Sussex County Council (WSSC) standards. Visibility splays have been calculated using speed and parking survey data and meet the requirements set out in Manual for Streets.
- 6.7.3 A Stage 1 Road Safety Audit has been undertaken, and all recommendations have been addressed. The access design ensures safe and suitable entry and exit for all vehicles, including emergency and service vehicles.
- 6.7.4 Trip generation has been calculated using the TRICS database, providing a robust assessment of the likely impact. The development is expected to generate 15 to 13 two way total vehicle trips during the AM and PM peak hours, which is considered negligible. As such no further assessment was considered necessary in the context of traffic movements.
- 6.7.5 Car and cycle parking provision will comply with WSSC's adopted standards. The illustrative layout shows 36 car parking spaces, which is sufficient for the proposed mix of housing. Each dwelling will benefit from cycle storage. Refuse collection and servicing can be accommodated safely within the internal road layout, with swept path analysis confirming vehicle manoeuvrability.
- 6.7.6 The proposals comply with national and local transport policies and offer a sustainable, well connected residential development. No highways or transport-related reasons have been identified that would justify refusal of the application.

6.8 ECOLOGY

- 6.8.1 Policy 31 of the HDPF 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.
- 6.8.2 An Ecological Impact Assessment have been produced by Ecosurv in support of the Outline Application. The assessment considered the potential effects upon protected species arising from the development. The potential for impacts to occur on badger, great crested newt, breeding birds, bats, and other notable species have been assessed. Mitigation measures have been proposed to ensure that impacts are avoided or minimised and that where possible enhanced habitats for these species will be provided within the proposed landscaping of the site.
- 6.8.3 Providing that the precautionary approach is followed, the impact of the development on protected species is considered to be negligible and can be appropriately controlled through mitigation through the following measures:
- Bird and bat boxes;
 - A District Level License Scheme for GCNs;

- A reptile receptor area;
- a sensitive planting scheme; and
- A sensitive lighting scheme

- 6.8.4 The PEA demonstrates that appropriate mitigation and compensation are provided.
- 6.8.5 Overall, subject to the above, the PEA concludes that with a series of mitigation, compensation and enhancement measures, the development will have negligible significant negative effects on the ecological value at the site
- 6.8.6 In terms of Biodiversity Net Gain (BNG) and based on the proposed off-site enhancement measures, the proposal will provide a BNG of 14.89% net gain exceeding the mandatory Environment Act 2021 requirements coming into force in November 2023.
- 6.8.7 The approach to Ecology matters and BNG accords with saved local and national policy, and the proposed measures can be secured by a Section 106 agreement. The Proposed Development is therefore acceptable in relation to ecology and BNG matters.

6.9 TREES

- 6.9.1 To ensure compliance with HDC's adopted and emerging policies, the development proposals have been guided by a tree survey in accordance with BS5837:2012. The design seeks to retain all moderate and high-quality trees within the application area, with removals limited to one group of scrub, parts of a low-quality vegetation group, and sections of hedgerow. These removals have been minimised through an iterative design process and will be offset through appropriate replacement planting.
- 6.9.2 With the exception of some tree removal, the development has been designed to allow for the retention of on and off-site trees growing close to the boundary of the site.
- 6.9.3 Overall, the Tree Report supports the proposal on the basis that the mitigation measures outlined within the report are adopted for the development and construction phases. The proposal is therefore considered to be acceptable in arboricultural terms.

6.10 FLOOD RISK AND DRAINAGE

- 6.10.1 Paragraph 59 of the Framework states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. Paragraph 167 is clear that when determining planning applications, local planning authorities should ensure that flood risk is not increased elsewhere.

- 6.10.2 The site is located within Flood Zone 1 i.e. at the lowest risk of flooding and appropriate for housing. The submitted Flood Risk Assessment (produced by Jomas Associates) demonstrates that the site would not increase flood risk to the surrounding area, and the development drainage scheme will fully utilise Sustainable Drainage Systems (SuDS) to ensure that there is no unacceptable impact on the existing public surface water system.
- 6.10.3 SuDS have therefore been provided as part of the surface water drainage layout to deal with the surface water generated from the development to ensure that flood risk is not increased elsewhere.
- 6.10.4 As infiltration is not possible on this site, reducing the post development run-off discharge rate to 2l/s is achieved through attenuation. Site discharge is via gravity to the existing sewer in the street or nearest watercourse. By controlling run-off rates to less than existing and providing attenuation for all storm events up to and including a 1 in 100-year storm plus 40% climate change allowance, the risk of downstream flooding will be minimised.
- 6.10.5 The foul water from the development will be collected in a system of gravity sewers discharging the existing public foul water sewer.
- 6.10.6 This report demonstrates that the development proposals can be suitably drained and will not increase the risk of flooding either on or off site. As such the proposals accord with the requirements of the NPPF and PPG in respect of securing a suitable and sustainable drainage strategy for the development.

6.11 MINERALS SAFEGUARDING STATEMENT

- 6.11.1 The application site is located within a Minerals Safeguarding Area (as defined in the WSCC Joint Minerals Local Plan (JMLP), 2018) for Brick Clay and Building Stone.
- 6.11.2 Policy M9 (iii) of the West Sussex Joint Minerals Local Plan requires that for non-mineral development, the decision-maker must determine whether the overriding need for the development outweighs the safeguarding of the mineral. In addition, the applicant must demonstrate that prior extraction is not practicable or environmentally feasible.
- 6.11.3 The site has not been used for mineral extraction for some time. Given the significant housing need in the District, the proposed 24 units would make an important contribution to Horsham's five-year housing land supply. The site is located adjacent to a railway line, mature woodland, and existing residential properties, with sensitive ecology habitat nearby. As such, prior mineral extraction is neither practicable nor environmentally or economically feasible.
- 6.11.4 Overall, the proposed development is considered to be consistent with the NPPF and the MPA's mineral safeguarding policies, as set out in Policy M9 of the WSJMLP.

6.12 AIR QUALITY

- 6.12.1 An Air Quality Assessment has been produced by Quantum Air in support of the Outline Application.
- 6.12.2 The assessment considered both the construction and operational phases of the scheme. During construction, potential impacts from fugitive dust emissions were evaluated using IAQM methodology. The site was assigned appropriate risk ratings and corresponding site-specific dust mitigation measures were recommended. Subject to their implementation, construction-related air quality impacts are predicted to be not significant.
- 6.12.3 For the operational phase, potential air quality effects arising from road traffic emissions were assessed. Due to the relatively low volume of vehicle movements expected from the development, impacts were also found to be not significant.
- 6.12.4 An Emissions Mitigation Assessment, in line with the Sussex Air Quality and Emissions Mitigation Guidance, was completed to determine the necessary mitigation for the proposed development.
- 6.12.5 Overall, the results indicate that the development will not result in significant adverse effects on air quality. As such, air quality is not considered a constraint to the granting of planning permission.

6.13 ENERGY

- 6.13.1 An Energy and Sustainability Statement has been produced by NuPlanet in support of the Outline Application.
- 6.13.2 The statement outlines how the proposals will incorporate sustainable design and construction principles in line with national and local planning policy.
- 6.13.3 Key measures include delivering 'zero-carbon ready' homes with no reliance on natural gas, high thermal performance fabric, and low-carbon air source heat pumps. Renewable energy generation, primarily via photovoltaic panels, will be integrated where necessary. Climate adaptation is a core part of the design, with effective overheating mitigation, extensive tree retention, new planting, and a multifunctional landscape strategy.
- 6.13.4 All dwellings with associated parking will include electric vehicle charging infrastructure in line with Approved Document S. Construction and operational waste will be managed in accordance with the Waste Hierarchy, prioritising prevention, re-use, and recycling.
- 6.13.5 Overall, the proposals demonstrate a clear commitment to sustainability and meet the relevant policy objectives of the Horsham District Planning Framework. The approach will be refined as the project progresses, with final details to be provided

at the Reserved Matters stage. The development represents a responsible and forward-thinking design that maximises environmental performance and long-term resilience.

6.14 CONTAMINATION

- 6.14.1 A Phase 1 Geo-Environmental Desk Study is included with this application. Noting that the site has historically been utilised for agricultural purposes, the report concludes that that precautionary on-site surveys be undertaken prior to construction. An appropriately worded planning condition can address this.

7 CONCLUSION

- 7.1.1 This Planning Statement has been prepared on behalf of Wienerberger Ltd ("the Applicant") in support an outline planning application at Land at Station Road, Warnham.
- 7.1.2 The proposals seek to deliver 24 new homes in a sustainable location, contributing towards the housing needs of the District.
- 7.1.3 Extensive technical documents and reports have been produced and these demonstrate the development of the Site is suitable, achievable and available and therefore deliverable in planning terms. It has also been demonstrated that the proposed scheme represents a sustainable form of development in a sustainable location and makes the best use of underutilised land. The application will therefore bring about several economic, social and environmental benefits including:
- Delivery of up to 24 market homes and affordable provision close to a train station;
 - High quality external spaces for the use of the residents of the new homes and attractive street frontages for the wider public;
 - 10% BNG; and
 - Off-site highway improvements
- 7.1.4 As illustrated by the Design and Access Statement and the supporting plans, a careful design exercise has been undertaken to develop the site in a way which is demonstrably landscape-led, and responding to the Site's context, opportunities and constraints, and surrounding character.
- 7.1.5 Finally, the Council have a significantly outdated Development Plan and cannot currently demonstrate a 5-year supply of deliverable housing sites with a significant shortfall. This Planning Statement has demonstrated that the proposed development will provide a valuable number of new homes for the District and is compliant with local and national policy. Hence in accordance with NPPF paragraph 11, the outline application should be approved without delay.
- 7.1.6 Overall, it is clear that any adverse impacts would not significantly and demonstrably outweigh the clear and substantial benefits that would arise from the proposed development when assessed against the policies of the Framework taken as a whole. The presumption in favour of sustainable development therefore applies, and HDC should grant planning permission promptly for this sensitively designed proposed development.