WSCC CONSULTATION RESPONSE (3):
County Planning – Minerals & Waste Planning Authority

TO:	Case Officer: Alice Johnson	
DATE:	09/10/2026	
LOCATION:	Land at Station Road, Warnham, West Sussex RH12 3SR	
SUBJECT:	DC/26/0585 | Outline application for the erection of approximately 24 residential dwellings, with all matters reserved except for access	
RECOMMENDATION:	☒Advice	☐More Information
	☐Objection	☐Consulted in Error
	☒No Objection	☐No Objection Subject to:

WSCC as Minerals and Waste Planning Authority (MWPA) have previously responded to this application 22 May 2026 and 26 August 2026. The following should be read in conjunction with those comments.

In response to requests for the submission of a Minerals and Waste Infrastructure Statement, the applicant has submitted a Minerals and Waste Infrastructure Safeguarding Assessment (MWISA). This is welcomed.

Minerals Safeguarding

As previously indicated, activities appear to have been taking place on the land for several years and the enclosed nature of the site (surrounded by woodland) results in a parcel of land of a limited area, proximate to residential/ecological receptors, and as such any substantive mineral extraction would unlikely be practicable or environmentally feasible in this location. Accordingly, subject to an overriding need for housing being established by the Local Planning Authority (LPA), the MWPA would not consider there to be any conflict with JMLP Policy M9.

Minerals and Waste Infrastructure Safeguarding

The submitted MWISA highlights that the proposed development is located at similar distances to safeguarded waste facilities/sites as existing neighbouring residential properties on Station Road. It suggests this demonstrates a compatible relationship is possible, and has been previously confirmed by virtue of planning permissions being granted for those waste facilities (i.e. established waste facilities should not act as constraint to the proposed development).

It also suggests that extant emission controls over existing (and future) waste activities as required by Environmental Permits (regulated by the Environment Agency) and/or planning conditional controls, are sufficient to ensure no unacceptable impacts on nearby residents in terms of noise, dust, odour and bioaerosols.

The MWPA would highlight that any planning application must be considered on its own merits based on up-to-date survey information, evidence, policy and guidance. This must

include consideration of the impact of the development on existing activities, and the 'Agent of Change' (NPPF Policy P4). In this case, the proposed development would inevitably result in a greater number of high sensitivity receptors, within an area likely to be influenced by activities at safeguarded minerals and waste sites.

The measures to reduce potential impacts on nearby sensitive receptors as required by the Environmental Permitting regime, are fully understood. However, it is again highlighted that Environmental Permits require best available techniques be adopted to minimise emissions from the site. They are not guarantee against emissions being experienced at neighbouring receptors, nor sufficient to demonstrate compatibility between neighbouring land uses, or that 'agent of change' principles are satisfied. Such issues must be considered under the planning regime.

In this case, the key area of concern is the potential for odour emissions to be experienced at the proposed development, and for this to act as a constraint to the operation of existing and future safeguarded minerals and waste infrastructure (Ref: policies M10 of the WSCC Joint Minerals Local Plan, 2018 – partial review 2021 ('JMLP'), and; Polices W2 and W10 of the WSCC Waste Local Plan 2014 ('WLP')). The submitted Air Quality Assessment (and recent Addendum) highlights evidence of several odour complaints in the locality associated with established waste facilities, and that occasional transient odours may occur at the application site. Based on the high sensitivity of receptors, it concludes a potential for 'slight adverse' odour impacts for parts of the application site. The MWPA would also highlight that experience of odour is often a highly subjective matter.

However, whilst the MWPA reserve concerns over the potential odour relationship with both existing and future safeguarded waste sites, it is noted that assessments conclude that typical prevailing wind conditions are such that odour impacts would be occasional, transient, and unlikely to be at level that would affect amenity. Crucially, it is also noted that the Environmental Health and Licencing Officers have accepted the findings of the submitted assessments, and raise no objection on these grounds (comments dated 05/10/26).

Conclusion

The proposed development has the potential to sterilise minerals, however, the extent of minerals affected would be limited, and any substantive prior extraction is considered unlikely practicable or environmentally feasible. Therefore, subject to an overriding need for housing being established by the Local Planning Authority (LPA), the proposal would accord with JMLP Policy M9.

Based on the findings of submitted technical assessments, and no objections being raised by Environmental Health and Licencing Officers, whilst the MWPA reserve concerns over the potential odour relationship, it is not considered there are sufficient grounds to raise an objection based on the potential to prevent or prejudice the operation of safeguarded minerals and waste infrastructure as required by Policies W2 and W10 of the WLP, and Policy M10 of the JMLP.

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