

Mowbray Phase 1 Area 4, Land North of Horsham

EIA Statement of Compliance

Reserved Matters

September 2026

Prepared on behalf of

Bellway

savills

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Statement of Conformity

1. Introduction

- 1.1 This report is prepared in support of a Reserved Matters Application (RMA) to be submitted by Bellway Homes Ltd to Horsham District Council (HDC/ LPA) for the development of Phase 1, Area 4 (the Site) of the outline planning permission ref DC/16/1677 to the North of Horsham.
- 1.2 Outline planning permission (ref DC/16/1677) was granted on 3 March 2018 for a comprehensive, phased, mixed-use development including approximately 2,750 dwellings and a business park of approximately 46,450 sqm at Land North of Horsham, West Sussex. Phase 1 is split into parcels between Old Holbrook Road and Rusper Road.
- 1.3 The red line boundary for the Site is shown in Figure 1.1 below, with a total Site area of 2.61 hectares (ha).
- 1.4 Area 4 (the Site) is situated on the north-western edge of Phase 1 of the Land North of Horsham urban expansion site. To the north lies Moat Road, which serves as a main distributor route through the wider development area, with open countryside extending beyond it. The western boundary of Area 4 is defined by established trees and hedgerows, behind which sit two existing properties, Oak Cottage and Rapelands Farm.
- 1.5 On the western flank, outside the RMA boundary, lies an established row of trees and hedgerows. The southern boundary features more established trees and hedgerows. The eastern flank has mature trees and hedgerows with Area 5 RMA beyond. These hedgerows and trees fall outside the RMA boundary.
- 1.6 The description of development for the Phase 1 Area 4 RMA (the Proposed Development) is:
- “Reserved matters application (internal access, appearance, landscaping, layout, and scale) pursuant to Condition 5 of Outline Planning Permission DC/16/1677 for Phase 1 RM Area 4 comprising 82 residential units, car and cycle parking, new landscaping, drainage, access and internal roads and associated infrastructure. ”*
- 1.7 The Proposed Development comprises urban development across the whole Site, set back from the Site boundaries. The proposal includes two vehicle access points on the northeastern boundary, one for vehicular access for eight dwellings and one vehicular access point for the rest of the Site.
- 1.8 It will comprise 82 residential dwellings (Use Class C3) consisting of one-bed and two-bed flats, and one-bed, two-bed, three-bed and four-bed houses, including 72 open market homes and 10 affordable homes as a split of six affordable rent and four shared ownership units as required by the S106.
- 1.9 Full details of the proposal can be found in the Design and Access Statement (May 2026) accompanying the application.

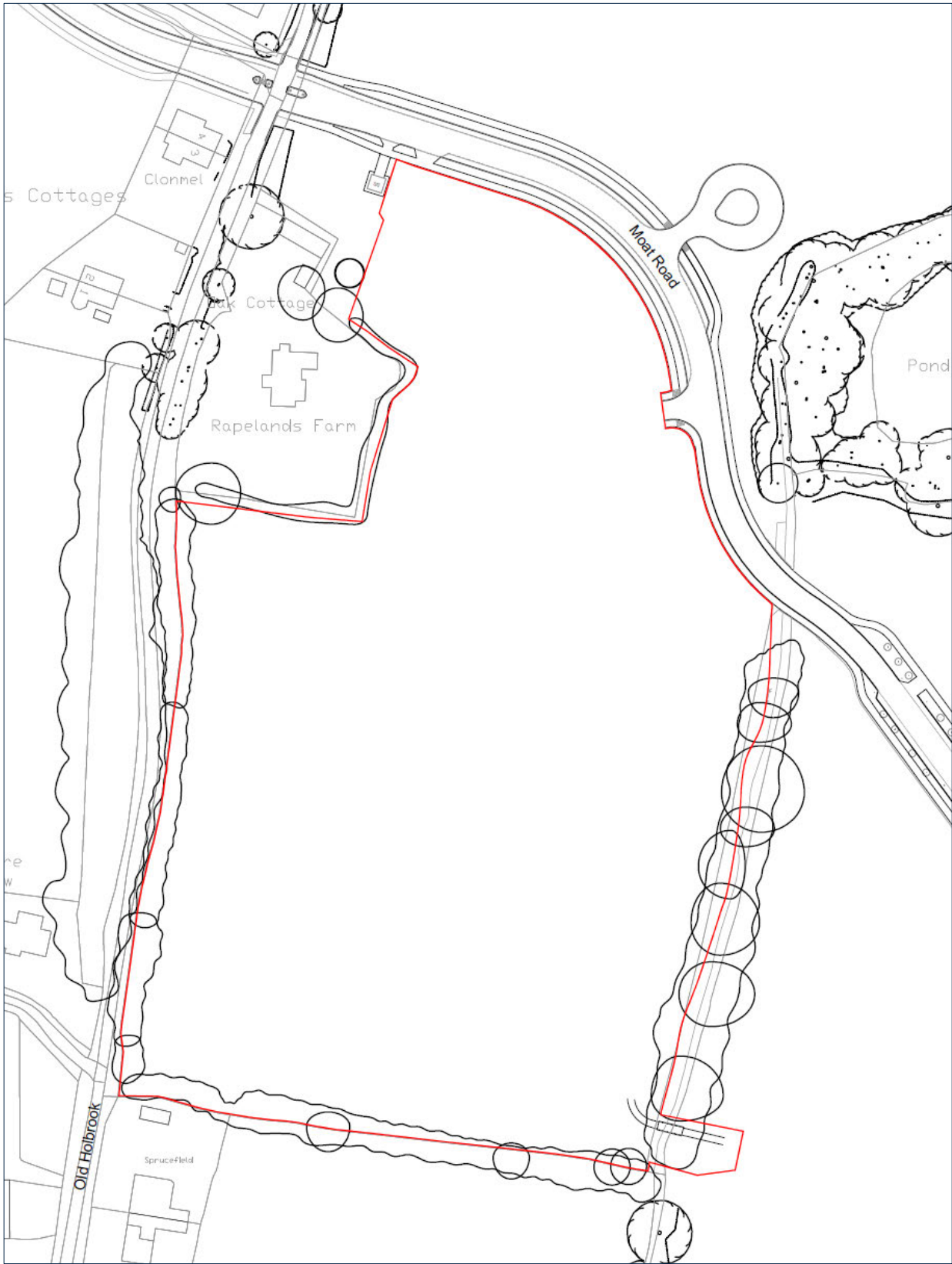
Relevant planning context and history

- 1.10 Following the outline planning permission (DC/16/1677), a non-material amendment (NMA) was approved on 12 March 2021, to amend all the parameter plans approved under outline permission (reference DC/21/0181).
- 1.11 In addition, several Reserved Matters Applications (RMAs) have come forward across Phase 1. RMAs have been approved for Area 1 (DC/20/2047) in the north-east and Area 2 (DC/21/0066) along the northern boundary. RMAs have also been submitted for Areas 5 and 6 (DC/24/1927) in the central area, Area 7 (DC/21/1427) in the south, and Area 10 (DC/22/1494) in the south-west of Phase 1.
- 1.12 The outline proposals required the construction of an internal road (now known as Moat Road) in order to connect the development of the under-construction Phase 1 area to the next development phase to the west of Old Holbrook (Phase 2). The construction of Moat Road was subject to two planning consents as follows:
- Horsham District Council ref. DC/20/2345 (primary street and green infrastructure). This consent covered the construction of Moat Road from the roundabout near Bohunt School extending north-west to the RM Area 4 red line, along with landscaping around RM Area 2. The application was submitted in November 2020 and approved in May 2021. Part of its red line boundary is shared with that of RM Area 4.
 - Horsham District Council ref. DC/24/0446 (Moat Road extension and landscaping). This consent covered completion of Moat Road at its western end near Old Holbrook Road, landscaping around RM Area 4, and RM Area 4 itself. The application was submitted in March 2024 and granted in October 2024.

EIA Statement of Conformity

- 1.13 The Outline Planning Application (OPA) was subject to EIA, which was reported in an Environmental Statement (ES) in February 2016. The ES was updated through an Environmental Statement Addendum (ESA) in March 2017, with additional information provided by the applicant including Landscape and Visual, Ecology, Archaeological, and Heritage effects.
- 1.14 Together, the February 2016 ES and March 2017 ESA are referred to as '**the Original ES**'.
- 1.15 This EIA Statement of Conformity presents Savills review of the Phase 1 Area 4 proposals (the Proposed Development) and application documentation against the parameters assessed in the Original ES, alongside relevant strategies and mitigation to evaluate the implications of the Proposed Development on the validity of the conclusions of the Original ES.
- 1.16 The review demonstrates that the Proposed Development, supported by the technical reports comprising the application documentation, conform to the previously assessed parameters and deliver against the relevant strategies and mitigation requirements relating to the EIA. As such, the environmental information contained within the Original ES remains valid in respect of the RMA.
- 1.17 Savills review is presented in Tables 1 to 3 in Section 2.

Figure 1.1 : Site Layout (Extract from drawing reference BSC-010-LP-01 Rev A)



2. Assessment Overview

Table 1: Parameter Plans

Parameter Plans	Compliance
Land Use Parameter Plan – Drawing Number 2153A-100O	Yes – The submitted drawings are consistent with the approved outline land use parameter plan. The proposed residential development area sits entirely within the residential development parcel assessed.
Density Parameter Plan – Drawing Number 2153A-101O	Yes – The submitted drawings are consistent with the approved outline density parameter plan, which showed the Proposed Development with a density of up to 30 dwellings per hectare (dph) (as amended within the NMA DC/21/0181). The RM proposals have an overall density of 32 dph. This is within the broad assessment envelope and tolerance within the density parameter plan which notes <i>“Intermittent use of higher densities within each parameter banding where there are landmark locations are considered appropriate.”</i> The slightly higher density on the RMA allows for these landmark locations on-site and provides better legibility of the street scene to provide these landmark features. As such, this is consistent with the approved parameter plans.
Building Height Parameter Plan – Drawing Number 2153A-102Q	Yes – The parameter plan established an allowance of generally up to 2 storeys (approx. 10m) across the Site, with a small area allowing up to 3-4 storeys (approx. 16m) on the eastern edge of the parcel, where the Moat Road breaks through the existing field boundary tree belt, connecting into Area 4 from the West Village area at the centre of Phase 1. The RMA adheres to the parameter plan assessed, with the majority of the Site proposed as 2 storey residential development, with 2no. proposed 2.5 storey units falling within the ‘up to 3-4 storeys’ zone, facing onto the Moat Road.
Movement and Access Parameter Plan – Drawing Number 2153A-103Q	Yes – The access and movement strategy for the Proposed Development is consistent with the approved outline parameters.
Green Infrastructure Parameter Plan – Drawing Number 2153A-105N	Yes – The RMA is compliant with the green infrastructure plan as the Woodland areas are retained along the south, east and west boundaries. Natural Greenspace is proposed near the boundaries. The attenuation ponds are present on the RMA proposal as approved by planning permission DC/24/0446. As such, the Proposed Development is consistent with the approved parameter plan.

Table 2: Strategy Compliance

Strategy	Compliance
Landscape Strategy	Yes the RMA is in compliance – Information provided within the Design and Access Statement (May 2026) and LVIA Conformity Statement (document ref. 7914/01).
Ecological and Lighting Strategy	Yes the RMA is in compliance – An Ecological Mitigation and Management Plan (EMMP) has been prepared by Bioscan which is consistent with the recommendations and commitments set out in the following outline planning documents: ▪ Chapter 12 of the Environmental Statement (ES), its appendices, and the subsequent ES addendum. ▪ Outline Ecological Mitigation and Management Plan (dated December 2016). ▪ Updated Appendix 12.19c (Bat Survey Report). A lighting strategy has been prepared by MMA Lighting Consultancy Ltd, which is compliant with the principles set out within the EIA.
Drainage Strategy	Yes the RMA is in compliance – The Proposed Development is consistent with the principles established in the approved Site-Wide Surface Water Drainage Strategy with the approved drainage arrangement forming part of the RM approval DC/24/0446 (where relevant to this RMA). The greenfield rates follow the principles outlined in the outline planning application. The proposed drainage strategy is set out in drawing 2500120_A-ACE-XX-XX-DR-C-0601.
Energy and Sustainability Strategy	Yes the RMA is in compliance – Information provided within the Energy and Sustainability Statement (May 2026).
Open Space	Yes the RMA is in compliance – Information provided in Design and Access Statement.
Waste Strategy	Yes the RMA is in compliance – Refuse strategy is set out within Highways Technical Note (2500120_A-ACE-XX-XX-RP-C-0102B), Drawing 250012_A-ACE-XX-00-DR-C-0504A and the Design and Access Statement. A Phase-Wide Construction Environmental Management Plan (CEMP) was prepared by Stantec to support the discharge of Condition 9 (ref. DISC/21/0276). This Phase-Wide CEMP applies to all Reserved Matters Applications within Phase 1. In addition, a CEMP has been prepared by ACE for Area 4 (document ref. 2500120_A-ACE-XX-XX-RP-C-0103C).

Table 3: Relevant design-related EIA Mitigation Requirements (see ES Chapter 19, Tables 19.1 and 19.2 and ES Addendum Chapter 19 for mitigation details)

Theme	Design and Additional Mitigation/ Compliance Requirement	Compliance
Socio-economics	Provision of healthcare and education facilities	Not Applicable – The Proposed Development is solely a residential development.
	Provision of housing (including affordable housing)	Yes - The proposals are for a range of homes, including various sizes, types and tenures (open market and affordable).
	Provision of employment and jobs	Yes – The proposals would provide job creation through construction and through home-based businesses and expenditure in the local economy by new residents. Provision of commercial and office use is not applicable, given the Proposed Development is solely residential.
Ground Conditions	Implementation of Quality, Safety, Health, and Environment Plan (QSHE). Competent remediation design, management and supervision	Yes – Phase 1 Area 4 is accompanied by Phase 1 Desk Study (LEAP Environmental – February 2026), to be submitted and discharged under Condition 18 of the Original Planning Permission. The overall risk from either on or offsite sources of contamination is considered to be low. The CEMP (ref. 2500120_A-ACE-XX-XX-RP-C-0103C) includes details of the construction mitigation.
	Waste management plan, and effective site waste management practices.	Yes – CEMP contains provisions for effective site waste management practice during construction.
	Implementation of CEMP	Yes – Phase 1 CEMP was approved by HDC in 2021 (ref: DISC/21/0006), providing an overarching framework for the construction works within Phase 1. A CEMP for Area 4 has been prepared.
	Management of hazardous substances in accordance with legislation and regulatory guidance.	Not Applicable – The Proposed Development is solely a residential development and therefore does not introduce risk of ground contamination from commercial end users.
Agricultural land	Re-use as much of the surplus soil resources on-site in the detailed design of gardens and green spaces.	Yes – The CEMP sets out construction waste and materials will be managed according to the principles of the waste hierarchy with a focus on waste prevention, re-use and recycling.
Landscape	Construction mitigation - locate contractor's compound and material stockpiles away from nearby sensitive receptors. Minimise length of construction time required, and use of designated routes for construction vehicles within and around the Site.	Yes – Construction access/ compound location is included in the CEMP alongside construction controls and mitigation. Construction time will be kept to a minimum where possible through effective construction methods. Construction traffic will utilise the access routes defined within the approved Phase 1 CEMP. Any heavy goods vehicles (max gross weight of 7.5 tonnes or higher) will be routed to avoid local residential roads. No vehicle access to the north will be permitted via Rusper Village, with all construction traffic to approach the site from the south via the A264.
	Green infrastructure and	Yes – The proposed Green Infrastructure is compliant with the

Theme	Design and Additional Mitigation/ Compliance Requirement	Compliance
	sensitive layout and design of development parcels, and creation of substantial new areas of natural green space and open space, including new tree, shrub and hedgerow planting.	EIA requirements. As set out within the DAS and detailed landscape plan, existing landscape features will be retained and enhanced where additional reinforcement is required to strengthen field boundaries. These features include existing field boundary hedgerows with hedgerow trees, most of which will be preserved and supplemented where appropriate. The Proposed Development is located within a rural setting, where the existing structural landscape will be retained and enhanced. Informal open space surrounds the parcel, providing multifunctional semi-natural greenspace. To the west of the Site, a designated area of amenity space is proposed, incorporating a children's play area (Drawing no. CSA/7914/110 Rev D). Area 4 is enclosed on three sides by mature landscaping, and the development has been set back from these features in general accordance with the outline parameter plans. Landscape buffers surrounding the proposed residential parcel range from 10 m to 65 m in width. Within the wider landscape buffers, additional uses have been integrated, including children's play space, informal social seating areas, and SuDS features. The proposals are consistent with the approved outline parameter plans, in terms of the scale and extent of built development and the landscape mitigation measures proposed. They are also consistent with the key landscape and visual mitigation measures that were set out in the outline landscape ES chapter. Overall, the level of landscape and visual effects resulting from the Phase 1 Area 4 RM proposals conform with the assessment and conclusion of the Original ES.
Archaeology and Heritage	Sensitive construction techniques to be secured within CEMP	Yes – Phase 1 CEMP and Area 4 CEMP provide information on the management of construction traffic throughout the entire construction phase. It also seeks to highlight Site specific requirements in order to put in place a level of control that minimises, where practical, the impact of the works on the surrounding area, neighbouring properties and the general public.
	Sensitive detailed design and materials	Yes – Built Heritage Statement (May 2026) notes the layout and height of the residential units are considered to be appropriate to the location of Hollywick Farmhouse, whilst the additional proposed buffering is considered to be sufficient once the vegetation has reached semi-maturity/ maturity. As such, the proposals are compliant with the EIA requirements.
	Archaeological watching brief	Yes – The Archaeological Planning Compliance Report assesses the heritage and archaeological elements on Site, which concludes that the archaeological conditions have been met and no further fieldwork or mitigation measures are required. As such, archaeological works are subject to an agreed WSI as a pre-commencement condition.
Transport	Pedestrian and Cycle Promotion	Yes – The Proposed Development seeks to maintain and enhance the pedestrian and cycle routes as set out within

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		Highways Technical Note and Travel Plan. No dedicated or segregated cycle routes proposed. All streets within the Site are designed as cycle-friendly residential streets, in accordance with the latest adopted guidance (WSCC's 'Guidance on Parking at New Development (September 2020)').
	CEMP to provide details of routing of construction traffic, including timing of heavy and abnormal load deliveries to avoid peak hours	Yes – The Proposed Development is supported by both a Travel Plan and CEMP seeking to reduce the impact during both construction and operational phases, and to encourage sustainable travel patterns.
Air Quality	Dust control measures to be in accordance with a CEMP.	Yes – Measure set out within Phase 1 CEMP and CEMP for Area 4.
Noise	Implement methods of noise and vibration reduction in accordance with the CEMP	Yes – Measure set out within Phase 1 CEMP and CEMP for Area 4.
	Noise sensitive and compliant detailed designs	Yes – The majority of the principles relate to the acoustic bund to the A264, which falls outside of RM Area 4. For the RM proposals, the layout has been developed having regard to acoustic principles to provide a barrier of built form to relevant noise sources.
Surface Water and Hydrology	Implementation of CEMP	Yes – Measure set out within Phase 1 CEMP and CEMP for Area 4.
	Masterplanning avoids any development in the flood plain. Development to be in Flood Zone 1, the area at lowest probability of flooding.	Yes – The drainage strategy has been designed to accommodate a 20% climate change allowance with a 40% sensitivity analysis, in line with the Site-Wide Drainage Strategy. Calculations show no flooding in the 100 year + 20% event.
	Drainage scheme and attenuation systems limit development run-off rates and volumes to existing greenfield levels or lower.	Yes – The drainage strategy is compliant with the EIA requirements. It is proposed to discharge the Site at a variable discharge rate as approved in DC/25/0446 and as shown in Glanville's Drainage Statement (119_8220585_JD_Drainage Statement_MRE) and Glanville's Surface Water Drainage Plan (MOW-GLA-PH1-RM4-1104).
	All rainwater falling on the site will pass through at least two treatment stages.	Yes – The SuDS design demonstrates adequate treatment prior to discharge of run-off into the sitewide drainage network and is compliant with the EIA Requirements.
Ecology	Retention of the key ecological features within masterplan (e.g. hedgerow network and ancient woodland)	Yes – The strategic landscape buffers for RM Area 4 were approved under a separate planning application DC/24/0446. This included new landscape planting in the form of trees and hedgerows along the southern, western and eastern boundaries of the Site. Retention of existing established field boundary hedgerows as the backbone of the structural open space borrows landscape character from the existing mature landscape. This is to be augmented with the introduction of new native and ornamental planting to support a sense of

Theme	Design and Additional Mitigation/ Compliance Requirement	Compliance
		place, as shown in the Landscape and Ecology Management Plan (LEMP) (document reference CSA/7914/02).
	Green Infrastructure provision	Yes – Tree planting is optimised throughout the Site. Boundary frontages have been designed incorporating a mixture of formal hedgerows and estate railings to more prominent plots fronting onto Moat Road. Along the edges facing the informal public open space at the rear of the Site, boundary treatments comprise a combination of hedging, ornamental shrubs and estate railings. To support wildlife connectivity, gaps measuring approximately 13 cm x 13 cm will be integrated into garden fences across the development to allow movement of hedgehogs and other small mammals, amphibians and reptiles into and between gardens. Valuable wildlife habitats will be created along the outer perimeter of the Site, with reinforced linear tree and hedgerow features comprising predominantly native hedge and woodland species. A robust soft landscape framework is proposed to soften streetscapes and respond positively to the Site's rural-edge context. Ornamental species have been selected for their wildlife value, including those that provide food through flowering and fruiting, as well as those that offer year-round cover to support the movement of fauna across the Site. Collectively, this approach will create strong visual connections to the surrounding landscape and contribute to an attractive and high-quality living environment. In terms of ecological enhancement for birds, and in accordance with the Phase 1 EMMP, a range of sparrow, swift and tit boxes will be installed within RM Area 4, with a particular concentration across the northern part of the Site. In total, 82 bird boxes will be provided (RM Area 4 EMMP, February 2026).
	The lighting design for the development will employ measures to minimise light spill onto adjoining habitats	Yes – The sensitive lighting strategy for RM Area 4 has been designed to take account of the presence of habitats and includes measures to reduce lighting effects on bats.
	Dust and noise are to be controlled to prevent impacts on ancient woodland and other retained habitats	Yes – Measure set out within Phase 1 CEMP and CEMP for Area 4 and Ecological Mitigation and Management Plan (EMMP).
	Implementation of CEMP to ensure that risk of contaminants reaching watercourse is negligible	Yes – Measure set out within Phase 1 CEMP and CEMP for Area 4, including provisions for avoiding and controlling pollutants entering the environment.
	The erection of bat boxes on retained trees and selected buildings will provide compensatory roosting	Yes – EMMP prepared. The majority of existing trees are being retained on the boundaries of the Site. In terms of enhancements for bats, Bellway has joined the 'Homes for Nature' scheme, which promotes the provision of bat boxes within new dwellings. Therefore, one Manthorpe 'Bat Ridge

Theme	Design and Additional Mitigation/ Compliance Requirement	Compliance
	opportunities	Roost' box will be installed within two dwellings on the southern boundary.

3. Conclusion

- 3.1 As set out in Tables 1-3, Savills confirms that the Phase 1 Area 4 of Mowbray, Land North of Horsham RMA is in compliance with the Outline Planning Permission DC/16/1677 dated 1 March 2018 and the Original Environmental Statement. The Proposed Development conform to the previously assessed parameters and deliver against the relevant strategies and mitigation requirements relating to the EIA. Therefore, is it considered that no further EIA information is required for the determination of the application.

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savills