

HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Mowbray Employment Park Horsham West Sussex
DESCRIPTION:	Outline planning application (all matters reserved) to provide an Employment Park comprising flexible commercial, industrial and logistics uses (Use Classes E(g), B2, B8), healthcare (Class E(e) including pharmacy) and commercial leisure.
REFERENCE:	DC/26/1240
RECOMMENDATION:	Modification

SUMMARY OF COMMENTS & RECOMMENDATION:

It is considered that the adverse landscape and visual effects of the development have not been sufficiently mitigated. Further design considerations and modification of parameter plans are therefore required to conserve and enhance the existing historic and mature landscape features, as well as mitigate adverse visual effects experienced by receptors along PRoW 1586.

The proposed Parameter Plan deviates from that consented under DC/16/1677 and subsequent no-material amendments and substantially weakens the green infrastructure network, resulting in a scheme that does not respond appropriately to its sensitive landscape setting. The Land Uses parameter plan should therefore be revised to provide wider landscape buffers that protect and reinforce the site's mature landscape framework, including its historic hedgerow and woodland.

Please see details below.

MAIN COMMENTS:

LVIA

1. The LVIA provided has been reviewed with reference to the Landscape Institute's Technical Guidance Note (2020).
2. Key parts of the assessment cannot be relied upon without further clarification and should therefore be treated with caution. These include, but are not limited to, the following:
 - a. The assessment does not identify a number of important landscape receptors, limiting a full understanding of the effects of the development on landscape character. The omitted receptors include:
 - i. The Priority Woodland found along the northeastern boundary; recognised as a habitat of principal importance for conservation
 - ii. *K2 - Faygate & Warnham Vale* LCA as defined by the Horsham District Landscape Character Assessment (2003), within which the site is located.
 - b. The sensitivity and susceptibility of individual receptors have not been assessed. Instead, the assessment considers only the site as a whole and the wider study area.

- c. The Natural and Cultural Heritage categories do not identify the Priority Woodland or the historic hedgerows, despite these landscape features being found in maps dating to at least the 1830s-1880s.
3. A number of remarks and conclusions within the assessment are also inconsistent or not supported by the assessment findings. These include but are not limited to the following:
- a. Applying the provided methodology, the magnitude of landscape effects should be *high*, as opposed to *medium-low* (6.2), as the development would result in a substantial, permanent alteration to the key landscape character or characteristics of the receptors. This would be particularly apparent if K2 was included as a receptor within the study area. Therefore, the level of effect should be identified as *major/moderate adverse* rather than *moderate-minor adverse*.
 - b. The LVIA assesses the site itself as having *high* magnitude of effect at Year 1 (6.4), resulting in a *major/moderate adverse* effect (6.5), and identifies a residual *moderate adverse* effect at Year 15 (6.9). These findings are inconsistent with the conclusion that the overall landscape character effect would be *minor adverse* (8.11–8.12). An overall *moderate/minor adverse* effect would be more consistent with the assessment findings.
 - c. Similar inconsistencies can be found within the assessment of visual effects.
4. Irrespective of the differences in the assessment conclusions, no mitigation is proposed beyond the embedded mitigation provided by the retention of existing trees and woodland. However, this cannot be relied upon as an effective mitigation measure given the partial removal and fragmentation previously approved under DC/25/1543, together with further areas of removal that appears likely within the proposed Leisure and Health parcels.
5. Further, no Tree Protection Plan (TPP) has been provided, therefore the extent of retention as the principal embedded mitigation measure has not been demonstrated.
6. Chapter 11 of the Environmental Strategy approved under DC/16/1677 details the following mitigation measures:
- Retaining and strengthening with new planting, where possible, the majority of existing hedgerows, shaws within the application site area, as well as retaining areas of woodlands, both within the application site and adjoining it, including the provision of appropriate 'buffer's to the woodlands.*
7. In addition, as per the Masterplan Design Principles proposed under DISC/26/0145, buffer zones should be provided at site edges via landscaping and planting. The Key Design Principles state that existing habitats will be protected and enhanced and that a range of habitats will be created with reference to Priority habitats.
8. As such, additional mitigation measures must be proposed in order to mitigate permanent, adverse landscape and visual effects. The following is requested:
- a. Provide a wooded buffer to the Priority Woodland, as per point 6; given its historic nature, a 15m deciduous woodland buffer is requested alongside its boundary. A buffer is noted within the Land Uses Parameter Plan, however the various masterplans do not reflect this.
 - b. Provide wider buffer zones to the site edge, as per point 7.
 - c. Provide substantial planting alongside PRoWs and existing landscape features, as per points 6-7.
 - d. Address the relevant Planning and Management Guidelines for the K2 LCA, such as:
 - i. bold native woodland and hedgerow planting;
 - ii. conserving and strengthening of existing hedgerows;
 - iii. proposing plant species that reflect the LCA.

Parameter Plans

9. The Land Uses Parameter Plan substantially reduces green infrastructure compared with the consented plan. This is compounded by the partial removal and erosion of historic and mature landscape features approved under DC/25/1543. As set out at point 8, a minimum of 15m buffer should be provided along around the northern, eastern and southern boundaries of Land Parcel 1 to protect the Priority Woodland, to provide a more sensitive response to the site's landscape setting and reflect the original LVIA Landscape Strategy and designed mitigation measures at para 11.7.5., including the provision of appropriate woodland buffer (and as set out at point 6 above). Development is also shown within the proposed buffer

(unclear what it is but appears to be a substation); this should be clarified and removed from the proposed green infrastructure to maintain the integrity of the buffer. Please amend.



Left: Consented parameter plan, Middle: Proposed parameter plan, Right: development within the landscape buffer

10. The proposed Building Heights Parameter Plan allows development up to 16m in height, excluding rooftop plant. This is inconsistent with the parameter plan approved under DC/16/1677 and subsequent non-material amendment approvals. The exclusion of rooftop plant must therefore be removed, with all rooftop plant contained within the specified maximum building height.
11. The proposed Access & Movement Parameter Plan identifies two potential access points to a new cycleway outside the red line boundary. While their precise locations may be determined at reserved matters stage, the principle of providing cycle routes within an attractive, landscaped environment, segregated from the main vehicular routes, must be established through the parameter plan. This is particularly important as the illustrative masterplans currently make no distinction between cycle routes and roads. The provision of segregated cycle routes would also support the landscape strategy and mitigation measures discussed at point 12 below.

Illustrative Masterplans

12. The original illustrative masterplan incorporated substantial hedgerow and tree planting in between development, together with tree lined streets. This reflected the landscape strategy and the mitigation measures set out in Chapter 11 of the Environmental Strategy approved under DC/16/1677. Although the masterplan was illustrative rather than approved, its landscape principles should inform the current proposals as an additional mitigation measure.



13. The tree line along the southern boundary of the northern parcel is identified as an amenity zone and key public space component. Irrespective of whether the area meets the relevant OSSR specifications, its current width and layout do not appear sufficient to provide a functional and attractive amenity space. The design should be reconsidered from the perspective of its intended users and the space widened to provide meaningful amenity, reinforce the green infrastructure network and contribute to the required landscape mitigation.

Landscape Proposals South of the Railway

14. The proposals identify existing grassland for retention; however, a basin also appears to be proposed within the western part of the buffer. The intended treatment of this area should be clarified and the plans amended to show a consistent proposal.

RECOMMENDED CONDITIONS:

If you're minded to recommend the application for approval without the concerns addressed above please get in touch as specific conditions will be required.

NAME:	Elly Hazael Trainee Landscape Architect (Planning)
DEPARTMENT:	Specialists Team - Strategic Planning
DATE:	28/09/2026
SIGNED OFF BY:	Inês Watson CMLI Specialists Team Leader (Landscape Architect)
DATE:	30/09/2026