



Horsham
District
Council

HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Mowbray Development Site Land North of Horsham West Sussex
DESCRIPTION:	Application for approval of Reserved Matters pursuant to Condition 5 of Outline Planning Permission reference DC/16/1677 for the Sports Hub including Pavilion and covered spectator stands, ancillary amenity buildings, access roads, landscaping, foot/cycle paths, car and cycle parking, and drainage including drainage basins, and associated infrastructure
REFERENCE:	DC/26/0012
RE-CONSULT:	1 st set of comments in black 2nd set of comments in blue
RECOMMENDATION:	Advice / More information Advice
SUMMARY OF COMMENTS & RECOMMENDATION: 2nd set of comments We have reviewed the response dated 20th March and it is regrettable that many of our concerns and recommendations have not been taken into consideration. These comments seek to secure a higher quality scheme that addresses the objectives of the development, protect its existing landscape features and secure its long-term use. We therefore expect the applicant to reconsider, highlighting that as they have recently removed proposed features such as wildflower planting, there must be scope to reinstate and/or include such features. We further note that the applicant does not agree to the recommended conditions, however the extant permission is not, on its own, sufficient to address elements such as the artificial pitch design, pollution protection measures, natural turf pitch construction and landscape details. As above, these elements and thus the proposed conditions are key to a successful, high quality development that addresses the design principles set out under DC/16/1677 and following design and landscape strategies, that comply with paragraphs 8c and 187e of the NPPF and that comply with HDPF Policy 24(3). Please note that this summary applies to all points previously raised, however further comments are provided for points 5, 8, 10, 11, 15 & 16.	

1st set of comments

We are generally satisfied with the changes to the proposals subject to conditions as detailed below. We highlight the following:

1. Landscape condition to secure the reinstatement of planting within the bike track area (point 5), additional section of hedgerow (point 7), extension of ball stop fencing outside pitches (point 9) and steel footings for timber equipment (point 10). Please note this list is not exhaustive.
2. Pre commencement: Provision of robust measures to minimise AGP infill loss and pollution
3. Pre commencement: Pitch detail design including drainage
4. Lighting details
5. LEMP

In addition, please note the point below about changes to the MUGA detail design to meet the Fair Space task and finish group findings.

See detailed comments below.

MAIN COMMENTS:

Sports & Facilities

1. Not enough information has been provided in regard to natural turf pitch drainage. Given the challenges raised by draining clay soils, we recommend that HDC Parks and Countryside is consulted to comment.
2. We wish to highlight the Council's task and finish group research to investigate the use of local spaces and facilities from a Fair Space perspective, therefore there is opportunity for one of the MUGAs to adopt a high quality, inclusive design that addresses the unmet needs for young girls in the district. We acknowledge the previous permission did not include this request, but we do encourage the applicant to consider this. Please refer to '[Make Space for Girls](#)' for resources and recommendations, such as zone subdivision to encourage more than one group to use the space at any one time.
3. Rubber infill is a major source of microplastic pollution and has significant, persistent environmental risks, which is of key concern given the abutting waterbodies on site; an estimated [1.5 and 2.5 tonnes](#) of infill granulate is lost from a standard football pitch each year. We note the ban on rubber infill use in the EU and therefore the long-term viability and maintenance for future Artificial Grass Pitches (AGPs). DEFRA is currently assessing the [broad restriction](#) of intentionally added microplastics in the UK, which includes rubber infill. We therefore recommend that [alternative options](#) are explored, incorporating a combination of the following options within proposals:
 - a. A non-infill design
 - b. Alternatives to infill materials such as cork or nut husks.
 - c. Incorporation of a shock pad to reduce volume of infill and therefore maintenance
 - d. Silt buckets within surface drains
4. At minimum, designs must incorporate containment barriers and boot cleaning stations at entrances; please include.

Soft Landscape

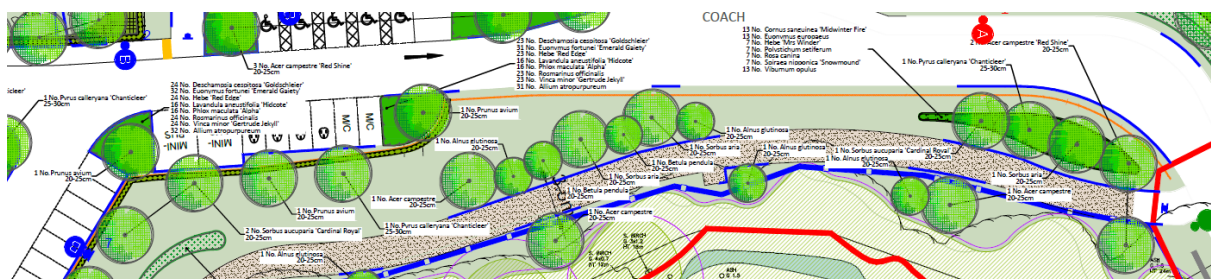
5. Areas of planting have been removed from within the bike track area in addition to 3no. trees. We request that these are reinstated.



[DC/26/0012 left, DC/24/0917 right]

We note response dated 20th March and respectfully request the evidence to demonstrate the health and safety concerns that could arise from the originally approved planting. In any case, we would be happy to consider an altered design as there is scope to position trees and planting further away from the track layout, however we are not supportive of its entire removal.

6. As previously requested under DC/24/0917, for visual coherence and suitability given the proximity to the ecological buffer and wetland, we request an alternative species to *Lonicera nitida*, such as yew, privet or further mixed native species as seen in the illustrative planting palette.
7. We continue to request that hedgerow is extended along the length of the south of the road in addition to the knee rail.



8. As previously noted, wildflower planting areas are proposed in the EMMP but do not feature in the planting plans. Please provide indicative locations in plan and update the planting schedule accordingly.

Wildflower planting has been removed from the EMMP. Closed.

Hard Landscaping

9. We continue to request ball stop fencing to extend along the bank, outside pitches, in order to better allow scrub planting to successfully establish within the AW buffer.
10. HDC requires any timber equipment to be installed with steel footings to prolong their longevity and avoid rotting. Please update the furniture specification as necessary.

We note response dated 20th March which states that there is no policy basis for this request. We highlight that this is a common request in Horsham due to its clay soils and that design choices that consider the lifetime of a development need not require policy backing. In any case, HDPF Policy 33 (5) requires the use of high standards of finishes and landscaping, which includes street furniture.

Lighting

11. Lighting information has not been submitted for the natural pitches. Please confirm if no lighting is proposed in this location.

[We note response dated 20th March which states that no lighting is proposed in this location. Closed, with thanks.](#)

12. Woodland and hedgerows, which are key characteristics of the local landscape, are likely to deteriorate and can result in loss due to increasing levels of light pollution. AW and its associated buffer to the north as well as the ecological compensation area to the west are particularly sensitive and currently fall within the proposed floodlight spill. It is therefore key that measures are implemented and/or specification altered in order to reduce light spill on these landscape features. We therefore recommend the use of shields to better direct light spill. While section 6.40 of the Planning Statement refers to back guards, it is unclear if the plans reflect this in the lux levels and no specification has been provided. Please provide detailed specification and updated lux levels plans accordingly.

Drainage

13. We note that drainage proposals for the natural pitches have not been included within the drainage strategy. Please clarify and/or provide this information, highlighting that the area to the south-east is particularly sensitive given the immediate slope and run off to Channells Brook.
14. As such, and as previously requested under DC/24/0917, robust pollution protection measures must be proposed to avoid impacts to the landscape features, watercourses and other controlled waters in the long-term.
15. We recommend that chemical fertilisers, pesticides and herbicides including glyphosate are not to be applied at any time due to impacts on existing and proposed ecological features, particularly the abutting waterways and woodland. Please refer to pan-uk.org for guidance and [resources](#), noting that herbicides including glyphosate must only be used on Schedule 9 species. Please amend the section 3.6 (table 5) of the Drainage Statement accordingly.

[We note response dated 20th March which states that there is no policy basis for this request. However, this recommendation aligns with the Council's climate resilience and carbon reduction objectives, as well as the Greenspaces Strategy 2024-2030. A review conducted by the Parks and Countryside team on use of pesticides and herbicides within the District's public spaces concluded that herbicide use, at this stage, should be restricted to specific circumstances, namely, treatment of invasive species listed under Schedule 9 of the Wildlife and Countryside Act, stump treatment, and limited annual application on selected hard surfaces \(e.g. cemeteries and selected paths in car parks\). These findings are to be reviewed every two years with the intention of further reducing or ultimately ceasing chemical use.](#)

[Therefore, we continue to recommend herbicide use across the site be reviewed and limited to a 'last resort' option only. Please amend.](#)

LEMP & Landscape Specification

16. As above, and as previously discussed, please amend the following sections to clarify that no chemical fertilisers, pesticides and herbicides including glyphosate are to be used at any time, except for Schedule 9 species:
 - a. Sections 130, 168, 210, 212, 221, 300, 330, 421, 675 of the Landscape Specification
 - b. Sections 5.22, 5.123, 5.127, 6.4.j, 7.7.e and 7.14 of the LEMP

- c. Points 6.5, 6.6, 11.1, 11.2, 13.7, 13.8, 15.11, 15.12, 19.11, 20.13, 21.9, 21.10, 22.5, 29.5 and 29.6 of the Maintenance Schedule within the LEMP

[See point 15.](#)

17. As previously discussed, in order to safeguard the genetic integrity of the abutting AW, planting stock should be locally sourced from suppliers of accredited UK Sourced and Grown stock, in accordance with Woodland Trust guidance. Only certain tree nurseries are suppliers of accredited UK Sourced and Grown stock, therefore we request supplier information for plant stock. We note the relevant aims and objectives within the LEMP, however this should be amended to include all proposed planting, as opposed to solely replacement planting. This may be secured via condition.

RECOMMENDED CONDITIONS:

Pitch Design

Pre-Commencement Condition: No part of the development hereby permitted shall take place until the full details of all pitch design have been submitted to and approved, in writing, by the Local Planning Authority. The details shall include plans and measures addressing the following:

- Details of artificial pitch design
 - To include containment barriers and boot cleaning stations at entrances
 - To consider alternative options to infill and minimising its loss.
- Details of pollution protection measures to avoid impacts of pitch run-off to watercourses.
- Details of natural turf pitch construction and drainage.

See points 1, 13 and 14 of landscape comments dated 25/02/2026 for more information.

Reason: To ensure adverse landscape effects are satisfactorily mitigated, including during construction, and in the interests of visual amenity in accordance with Policy 33 of the Horsham District Planning Framework (2015).

Hard and Soft Landscaping Scheme

Pre-Occupation Condition: Prior to the first occupation of any part of the development hereby permitted, full details of all hard and soft landscaping works shall have been submitted to and approved, in writing, by the Local Planning Authority. The details shall include plans and measures addressing the following:

- Details of all trees and planting including:
 - Reinstatement of planting within the bike track area (see landscape comments under point 5 dated 25/02/26, and point 8 dated 20/08/24)
 - Alternative species to *Lonicera nitida* (see landscape comments under point 6 dated 25/02/26, and point 9 dated 20/08/24)
 - Hedgerow extending along the south of the access road (see landscape comments under point 7 dated 25/02/26, and point 9 dated 20/08/24)
 - ~~Wildflower planting (see landscape comments under point 8 dated 25/02/26, and point 10 dated 20/08/24)~~
 - Ball stop fencing to extend along the bank, outside pitches (see landscape comments under point 9 dated 25/02/26, and point 4 dated 20/08/24)
- Written specifications (NBS compliant) and LEMP to remove use of herbicides (see landscape comments under point 16 dated 25/02/26, and point 15 dated 20/08/24).
- Supplier information for plant stock – only locally-sourced planting stock should be used and only certain tree nurseries are suppliers of accredited UK Sourced

and Grown stock (see landscape comments under point 17 dated 25/02/26, and point 12 dated 20/08/24)

- Details of minor artefacts and structures – such as street furniture, play equipment and signage – including location, size, colour and specification. To ensure that timber equipment has steel footings pitches (see landscape comments under point 10 dated 25/02/26)
- Details of all external lighting to include:
 - ~~Specification and lux levels plan for the natural pitches (see landscape comments under point 11 dated 25/02/26)~~
 - Measures to reduce light spill on existing landscape features, such as specification for shields and an updated lux levels plan (see landscape comments under point 12 dated 25/02/26)

The approved landscaping scheme shall be fully implemented in accordance with the approved details within the first planting season following the first occupation of any part of the development. Unless otherwise agreed as part of the approved landscaping, no trees or hedges on the site shall be wilfully damaged or uprooted, felled/removed, topped or lopped without the previous written consent of the Local Planning Authority until 5 years after completion of the development. Any proposed planting, which within a period of 5 years, dies, is removed, or becomes seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species unless the Local Planning Authority gives written consent to any variation.

Reason: To ensure a satisfactory development that is sympathetic to the landscape and townscape character and built form of the surroundings, and in the interests of visual amenity in accordance with Policy 33 of the Horsham District Planning Framework (2015).

NAME:	Elly Hazael Trainee Landscape Architect (Planning)
DEPARTMENT:	Specialists Team - Strategic Planning
DATE:	25/02/2024 26/03/2026
SIGNED OFF BY:	Inês Watson CMLI Specialists Team Leader (Landscape Architect)
DATE:	25/02/2026 30/03/2026