From: Planning@horsham.gov.uk
Sent: 04 September 2025 16:05
To: Planning
Subject: Comments for Planning Application S106/25/0013

Categories: Comments Received

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 04/09/2025 4:04 PM.

Application Summary

Address:	Mowbray Land North of Horsham Old Holbrook Horsham West Sussex
Proposal:	Amendment to the wording of Schedule 14 of the legal agreement under DC/16/1677 in relation to the definition of Retail Floorspace for the Mowbray Development Site.
Case Officer:	Jason Hawkes

Click for further information

Customer Details

Address:	Unit B, 24 Piries Pl HORSHAM Horsham

Comments Details

Commenter Type:	Member of the Public
Stance:	Customer objects to the Planning Application
Reasons for comment:	- Design - Overdevelopment
Comments:	Objection by Your Horsham (Horsham BID Ltd) Amendment to the wording of Schedule 14 of the legal agreement under DC/16/1677 in relation to the definition of Retail Floorspace for the Mowbray Development Site. Date: 02 September 2025 From: Your Horsham (Horsham BID Ltd), the Business Improvement District representing 300+ town centre businesses Position: Objection: The proposal conflicts with the adopted development plan and would greatly harm the vitality and viability of Horsham town centre. 1) Executive summary Your Horsham's mandate is to safeguard and strengthen Horsham town centre. This is achieved by retaining existing retailers, attracting new investment, and supporting a diverse range of retail, hospitality, services and leisure businesses. The proposed uplift in out-of-

centre retail floorspace at Mowbray materially conflicts with the Town Centres First approach and with the scale, role and purpose of the Mowbray Local Centre as set in the current adopted plan. It risks diverting trade and an anchor-scale operator out of the town centre, undermining investment, confidence and occupancy in the primary pitch. These harms run contrary to Policies 5, 6, 12, 13 and the Strategic Development (SD) policies for Land North of Horsham. [See Horsham District Planning Framework (2015) (HDPF)].

2) Development plan conflict

A. Town Centres First & sequential approach [Policies 12 & 13]

The HDPF actively promotes a "Town Centres First" strategy, requiring town-centre uses to be located in defined centres and assessed by the sequential test. The plan is explicit that out-of-centre sites will not normally be considered for town centre uses. Policy 13 further directs main town centre uses to centres and states that proposals outside centres are only permissible following a sequential test, with Broadbridge Heath identified as the only recognised out-of-centre location for such uses, as stipulated under Policy 6. The Mowbray development is not within the defined town centre boundaries

B. Role and scale at Mowbray: Local Centre cap [Policies SD1-SD3]

For Land North of Horsham, the adopted plan is clear: the Local Centre should serve the new community's day-to-day needs, including a foodstore with sales floorspace no more than 6,000 m², and must not detract from the vitality and viability of Horsham town centre. Policy SD3 repeats this as a cap and requires impact to be acceptable.

Any uplift above 6,000 m² conflicts with the allocation's purpose and scale. A change in the wording from 6,000m2 gross internal area to 6,000m2 net sales area would mean that the total overall size of the building space will increase significantly, possibly to a total floor area of over 9,000m2. This alters it's purpose as a small food retail space to something much larger, creating a large retail unit that does not merely serve the needs of the immediate local community but becomes a destination scale retail unit that draws a much wider audience. In particular it is likely to draw business and incidental spend from out of Horsham Town Centre. A large scale development, which this would become, will directly work against the Policy SD1 - SD9 as it will not:

1. Ensure that the future community has its own identity and character.
2. Be locally distinctive and unique.
3. Have a minimal impact on the transport network
4. Be a retail food store but a much larger "retail" unit .

It will however jeopardise some of the additional key facilities proposed for this site due to the additional space it will occupy, meaning that the proposed community facilities, health provision (doctor and dentist) , community spaces such as a library and open spaces and smaller retail units may lose space or be reduced in number.

C. Protecting town centre vitality and viability [Policies 5 & 12]

Policy 5 [Strategic Policy: Horsham Town] seeks to retain and enhance the town's retail mix and support a vibrant high street; Policy 12 sets the retail hierarchy with Horsham as the Primary Centre and provides positive measures to keep centres as the prime focus for community life. A large, destination-scale retail uplift at Mowbray would undermine these objectives.

D. Out-of-centre retail impacts and thresholds [Policy 6 - BBHQ]

Where the plan does contemplate out-of-centre main town centre uses (BBHQ), it requires robust safeguards: no adverse impact on Horsham town centre and an impact assessment threshold (additional 2,500 m²). That benchmark underlines the plan's caution about out-of-centre retail. Extending Mowbray beyond its Local Centre remit would bypass these controls.

3) Likely harms to Horsham town centre (material considerations)

1. Trade & footfall diversion: A materially larger, car-oriented retail destination at Mowbray would divert comparison/convenience spend and routine trips away from the town centre, contrary to Policies 12-13 objectives to maintain a concentrated retail core and prime-pitch vitality.
2. Anchor risk and co-tenancy effects: Horsham's anchor draws (e.g. M&S, Next, H&M, Boots, Sports Direct, Waitrose, John Lewis, Sainsbury's, TK Maxx, Dunelm) underpin independent and multiple traders alike. A new out-of-centre large format unit can attract a new anchor-scale competitor to the edge and/or induce relocation pressure, with knock-on co-tenancy/void risks. This runs directly against Policy 5's aim to retain and enhance the retail mix in the town.
3. Conflict with the purpose of the Local Centre: The allocation for this site currently envisages everyday-needs provision (with the 6,000 m² sales-floorspace cap) rather than a district-wide draw that competes with the town centre. The proposal is contrary to SD3 and the Town

Centres First approach.
4) Sequential and impact tests (application of policy)
- Sequential: There is no justification for expanding out-of-centre comparison/convenience provision at Mowbray ahead of in-centre or edge-of-centre options that maintain the town-centre focus [Policy 13].
- Impact: Given the scale indicated (above the 6,000 m² cap), the applicant must demonstrate no significant adverse impact on the vitality and viability of Horsham town centre, consistent with SD3 (and by analogy with Policy 6 safeguards at BBHQ). The proposed uplift heightens the risk of adverse impact rather than reduces it.
5) Conclusion and requested determination
For the reasons above, the proposal is contrary to the adopted development plan and should be refused as it conflicts with:
- Policy 13 (Town Centre Uses) - Town Centres First & sequential approach; out-of-centre normally unsuitable.
- Policy 12 (Vitality & Viability) - maintaining the retail hierarchy and prime focus within centres.
- Policies SD1-SD3 (Land North of Horsham) - Local Centre limited to ≤6,000 m² food retail sales floorspace and must not harm Horsham town centre. The proposed amendment is significant in terms of size and type of retail space which is NOT purely food.
- Policy 5 (Horsham Town) - retain and enhance retail mix and support a vibrant high street.
The likelihood of a large national retailer occupying this proposed vastly increased sales space is very real. The implications for Horsham Town Centre are significant. We risk:
1. Losing a key anchor store, the subsequent cascade effect of this being that additional anchors, nationals and independents will leave Horsham Town Centre .
2. Driving footfall and income away from the town centre into an out of centre retail zone
3. Job losses
4. Less investment in the town centre resulting in its demise as a central hub and the primary economic and cultural centre in the district and wider economic area.
6) Your Horsham's request
We respectfully request that HDC refuse the proposed uplift in retail floorspace at Mowbray, as it is incompatible with the adopted plan, and work with the BID on town centre first solutions that fill existing large units, retain anchors, and sustain Horsham's unique retail and hospitality ecosystem.

Contacts: Your Horsham (Horsham BID Ltd)
[redacted]
Your Horsham

Kind regards

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Horsham District Council

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Telephone: 01403 215100 (calls may be recorded) www.horsham.gov.uk Chief Executive: Jane Eaton