# A Commentary on the resubmitted RIA for Horsham District Council:
## Re: Mowbray site

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Placechanger

# 1 Purpose of this Paper

1.1 The purpose of this paper is to provide a commentary on the second submission of an RIA to Horsham District Council (HDC) to amend the Section 106 agreement regarding Planning Application DC/16/1677. This was submitted to HDC December 2025

# 2 Placechanger & Graham Galpin

2.1 There appears to be a misunderstanding of Graham Galpin's experience. Whilst we accept that his emphasis currently is "Town" centric, his background is based on an academic approach to supporting European Structural Fund programmes for Canterbury Christ Church University in Thanet. He brought together data from primary research and national datasets. He has successfully submitted proposals for European programmes and initiatives and negotiated them with the European Commission.

2.2 He was a consultee on the process of establishing the Index of Multiple Deprivation at its outset and has recognized skill with use of statistical data and its management. He ran a consultancy company for 14 years which worked on major projects for HMG including the case viring EU funding to support a beleaguered supply chain upon the closure of MG Rover and many other projects.

2.3 As Chair of Kent Invicta Chamber of Commerce, he was instrumental in making it a leading policy shaper.

2.4 Graham is a Fellow of the Institute of Place Management (IPM) and has almost 30 years' experience in regeneration and economic development. He has spoken on town centres at conferences in Brussels (EU Parliament building) and many London events.

2.5 After 14 years in Academia and consulting he was a Cabinet Member responsible for town centres for Ashford (Kent) Council and a member of the Planning Committee.

2.6 He was a key government advisor within the Timpson Panel which proposed the High Street Task Force and the (initially £650million) Future High Street Fund.

# Commentary on the Key points addressed in the Resubmission.

3.1 The many of the initial findings of the Placechanger response to the initial RIA remain largely unchanged but we note the (sometimes) clear cases made for variation by the applicant, and open nature of some of their assertions.

3.2 The disagreement and need for the requested amendment regarding the area of SALES floor space and the Gross Internal Area is a key issue. It is agreed that there is some ambiguity in the S106 agreement but if the applicant felt that there was no confirmation needed to proceed with the development of the Sales Floor Area and not GIA then doubtless this would not be an issue. They could proceed with detailed planning permission with the development as they assumed. They show this in their Fallback position.

3.3 The ambiguity is due to some difficult phrasing in the OPP S106, but to the less sophisticated reader they could easily become convinced of either the GIA or Sales area as the intended agreement. If the applicant were not satisfied when signing the S106 agreement, then they could have asked for clarification on that point.

3.4 I note that the RIA asserts regularly that certain issues are not Planning Considerations and in this we agree.

3.5 The primary issues in this case relate to the principal of *Town Centre First.* The applicant has used copious data from econometric models to substantiate that the impact of displacement is marginal to Horsham Town Centre. Econometric models, whilst frequently used in strategic planning, have a high control band.

3.6 In 2007, as Chairman of Kent Chamber of Commerce I attended a presentation by the Deputy CEO of the Bank of England. He presented a rosy prediction of the economic future, based on extremely “reliable” econometric models. In the Q&A I asked him whether he agreed that the potential collapse of the sub-prime mortgage market in the USA would have severe repercussions on the world economic situation. He was adamant that this would never happen. Sadly, he and his model were very wrong.

3.7 Because of this and my own work using the Cambridge Econometrics model in the 1990s, I find econometrics should be used as a guide, with experience and local knowledge shaping the final assumptions.

3.8 A key point is apparent to me in that the displacement of turnover shown in the various tables because of the increase in sales floor space assumes that the incoming retailer in the larger single unit will be additional to present in-town retail.

3.9 Lord Rose, the erstwhile COE of M&S, in a recent radio interview [1] Explained his thoughts that there is little future for large stores in town centres. A major retailer in Horsham Town may consider the Mowbray development as a future option. This will immediately lower the town centre turnover and move the summary proportions shown in the tables.

3.10 The baseline for the adherence to the already-agreed OPP is shown in a summary as a “fallback position” and I agree that this shows the challenges facing the retail industry, however the new position shown in tables does not include the challenge of

[1] The World This Weekend; BBC Radio 4 28/12/2015

serious retailer displacement. Many successful shopping centres are still recovering from the loss of Debenhams (and other larger retailers) from their town centres. For example, Canterbury, a tourism hotspot. It has still to find an acceptable solution to the void left by Debenhams. This is true of many other towns with active management functions. Towns also experience the domino effect that when a larger operator leaves a town centre, other smaller traders leave as footfall declines.

3.11 Nationally there is a significant year-on-year decline[2] in town centre retail transactions have **decreased** from 2024 (year to date) by 4.2%. The average transaction value has increased (marginally) by 1.2%, that figure is substantially supported by increases in food and beverages. If one discounts the inflationary impact the figure reverts to negative.

3.12 It is agreed that there is a recovery in rental returns and a drop in voids in the retail sector but there is no evidence that this is so for larger units which are exempt from the new rental auctions.

[2] Beauclair Retail Sales Insights July 2025

## Conclusions

4.1 I recognise that the 400 square metres of sales area to service the new development in a “village” environment is an entirely valid and acceptable.

4.2 I recognise that as with all the retail areas the development is speculative. It must be noted that whilst the smaller units will attract users from homes largely sited in Mowbray, the larger unit has a larger catchment and must include those who may normally expect to shop in Horsham Town.

4.3 There is evidence that if the speculative and larger development was available as described in the RIA, then the risk of displacement of a town centre store is very high. If an occupant was not a town centre business displaced, then I suggest that there are fewer takers available for the larger unit. I suspect an economy supermarket would take a unit of the size already agreed.

4.4 The RIA reads as if there are clients targeted that are likely to locate to this site. If this is the case it would help if the identity of such clients were made clear in the document to justify some of the future displacement figures shown in the Assessment.

4.5 One must, of course, recognize that any large store may want to centralize its offer through ease of vehicular access. Parking is a serious issue for larger shops. Lord Rose in his interview (ibid) expressed the difficulties for large stores with limited or no specific parking zones as the attraction of OOT shopping centres. This could make the risk of relocation beyond Horsham a real risk and The Swan Centre and other Horsham retail destinations should consider lobbying to improve car access to the town centre. This cannot compromise pedestrian access and safety.

4.6 I suggest that the council brings businesses and the BID into future planning discussions as a town team.

4.7 Increases in travel-to-shop distances suggested by a larger store in the Mowbray site conflicts with National and Council policies on $CO_2$ emissions and green targets.

4.8 Town Centre First is still a key issue to take account of in the NPPF.

## Recommendation

That Horsham DC should accept the amendment as tabled **only** if supported by a S106 agreement to preclude relocation of town centre retail to the larger unit but should fully and actively support the agreed “fallback position” in the OPP as an alternative.