



EMPLOYMENT LAND, MOWBRAY APPLICATION FOR OUTLINE PLANNING PERMISSION

Planning Statement

On behalf of **Legal & General (Strategic Land North Horsham) Limited**

Document Control Sheet

Project Name: Employment Land, Mowbray

Project Ref: 333102644/A5

Report Title: Planning Statement

Date: July 2026

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Revision	Date	Description	Prepared	Reviewed	Approved
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1 INTRODUCTION & OVERVIEW

- 1.1 Legal & General (Strategic Land North Horsham) Limited (**'L&G'**) acquired majority control of the strategic site known as 'Land North of Horsham' (the boundary of which is shown on drawing 2153A-01L; the **'Site'**, now known as Mowbray) from Liberty Property Trust UK Limited (**'Liberty'**) in December 2018. The Site is allocated within the Horsham District Planning Framework (2015) to provide, inter alia, at least 2,500 new homes alongside a new business park, local centre and schools (Policy SD1).
- 1.2 An application for outline planning permission was submitted on behalf of Liberty in August 2016 and approved subject to conditions on 1 March 2018 (LPA reference DC/16/1677; the **'OPP'**) for a mixed-use strategic development as follows:

'Outline planning application with all matters reserved except access for a mixed use strategic development to include housing (up to 2,750 dwellings), business park (up to 46,450 m²), retail, community centre, leisure facilities, education facilities, public open space, landscaping and related infrastructure.'

- 1.3 The OPP provided for a 'business park' of up to 46,450 sq.m of (former) Use Class B1 floorspace, assuming predominantly offices with a small area of mixed use (retail, leisure etc) to serve the business park and option for a healthcare facility if not provided in the Phase 1 village centre or off-site.
- 1.4 The business park, also known as the 'Employment Land', is located in the eastern part of the Mowbray development to the north of the A264 and immediately west of the railway line.
- 1.5 The time limit for the submission of Reserved Matters pursuant to the OPP on the Employment Land has passed. The market for office-led employment parks is significantly different to the time when the OPP was approved. L&G is therefore seeking Outline Planning Permission for an Employment Park that diversifies the range of uses to allow for flexible commercial, industrial and logistics uses, healthcare, commercial leisure, and ancillary development thereto, set out in the description of development below (the **'Proposed Development'**):

'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.'

- 1.6 The Proposed Development exceeds 1ha of urban development (not dwellinghouses) and has an overall area that exceeds 5ha. As such it is considered to constitute Schedule 2 development as defined by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (the **'EIA Regulations'**). The OPP ES (2016) and Addendum (2017) reported major beneficial, moderate beneficial and adverse residual effects which are deemed 'significant' in EIA terms. The Proposed Development has the potential to result in significant effects when considered with the OPP (i.e. wider masterplan). An Environmental Statement (**'ES'**) has therefore been prepared and is submitted within this application.

Content of Submission

- 1.7 The application is accompanied by a comprehensive suite of technical, environmental and design documents, which together confirm that the Proposed Development is acceptable from a design, highways, landscape, ecology, flood risk, drainage and amenity perspective.

No.	Report Title	Author
01	Application Forms	Stantec
02	Covering Letter (inc. scope of submission)	Stantec
03	Planning Statement	Stantec
04	Site Location Plan	Scott Brownrigg
05	Parameter Plans	Scott Brownrigg
06	Illustrative Masterplans	Scott Brownrigg
07	Context Masterplans	Scott Brownrigg
08	Detailed Railway Strategic Landscape Buffer Plans	David Jarvis Associates
09	Design and Access Statement	Scott Brownrigg
10	Landscape Visual Impact Assessment	David Jarvis Associates
11	Arboricultural Impact Assessment/ Tree Survey	David Jarvis Associates
12	Biodiversity Statement (and BNG Metric)	Derek Finnie Associates
13	Utilities Assessment	Hoare Lea
14	Flood Risk Assessment and Drainage Strategy	Glanville
15	Transport Assessment	Glanville
16	Land Contamination Assessment	Geo-Environmental
17	Minerals Resource Assessment	Identity Consult
18	Energy and Sustainability Statement	Hoare Lea
19	Heritage Statement	Stantec
20	Statement of Community Involvement	Cratus Group
21	Environment Statement	Stantec

- 1.8 The ES includes the following topics:

- Socio-Economics
- Biodiversity
- Air Quality
- Noise and Vibration
- Climate Change

- 1.9 The purpose of this Planning Statement is to explain the form and content of the Proposed Development, demonstrate compliance against adopted and emerging policies and guidance, and to assess the planning merits of the application against other material considerations.

2 PLANNING HISTORY & BACKGROUND

Strategic Allocation

- 2.1 The Site is the subject of a strategic allocation within Horsham District Council's ('HDC') adopted local plan: the Horsham District Planning Framework (2015; 'HDPF'). Policy SD1 (Strategic Policy: Land North of Horsham) allocates the Site for a 'mixed use strategic development to accommodate at least 2,500 homes and associated infrastructure' (page 67). In addition to new homes, Policy SD1 clarifies that the 'associated infrastructure' would include a business park, local centre, land for new schools, land safeguarded for a new railway station adjacent to the business park and open space, sport and recreation facilities.

Outline Planning Permission

- 2.2 Following the allocation of the Site through the HDPF, Liberty Property Trust applied for Outline Planning Permission for the strategic development of the Site having regard to the principles outlined in Policy SD1. The application was submitted to the Council in August 2016 and approved on 1 March 2018 (LPA reference DC/16/1677) for the following:

'Outline planning application with all matters reserved except access for a mixed use strategic development to include housing (up to 2,750 dwellings), business park (up to 46,450 m2), retail, community centre, leisure facilities, education facilities, public open space, landscaping and related infrastructure.'

- 2.3 The OPP was granted subject to conditions as set out on the Decision Notice. A legal agreement pursuant to Section 106 of the Town and Country Planning Act 1990 (as amended) was completed upon the grant of the OPP, dated 1 March 2018 (the '**s106**').
- 2.4 The OPP was accompanied by an Environmental Impact Assessment (Environmental Statement dated July 2016 with March 2017 Addendum; the '**OPP ES**').

Employment Road

- 2.5 An application for Full Planning Permission (LPA reference DC/25/1543) was approved on 2 July 2026 for the primary road through the Employment Land (the '**Employment Road**') which leads from the existing left-in left-out junction ('**Li-Lo**') with the A264 into Phase 2 of the OPP. The Employment Land Road permission was accompanied by a section 106 Agreement (dated 30 June 2026; the '**Employment Land Road s106**') solely related to Biodiversity Net Gain ('**BNG**').
- 2.6 The road extends through the centre of the Employment Land, splitting the northern and southern parcels and is the primary access into the Employment Land development.

3 PROPOSED DEVELOPMENT

The Site

- 3.1 The Employment Road leads through the centre of the Proposed Development, separating the northern and southern halves of the Employment Land. The Employment Road application includes realignment of a Public Rights of Way ('**PRoW**') with new cycleways to the north and south. The Proposed Development has been designed in accordance with the detailed road layout.
- 3.2 The Employment Land comprises six parcels of some 17.21 hectares. Five are arranged in a quadrant with the Employment Road running through the centre, with the fifth parcel positioned between the railway line and the A264, spanning from the Moorhead Roundabout and east to Wimland Road.
- 3.3 Within the context of the OPP, the Employment Land is situated between the Sports Sub-Phase and Sub-Phase 2D of the approved OPP Phasing Plan (2153A - 507E) with Sub Phase 2B on the opposite side of the Bush Lane Bridleway to the north.

Description of Development

- 3.4 Outline Planning Permission is sought for the following works:

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.

- 3.5 Five of the six parcels (labelled 1 to 5 on the Land Use Parameter Plan ref. 20967-SBR-SW-XX-DR-A-00201 Rev P09) are proposed for employment-generating uses with the sixth a Strategic Green Buffer between the railway line and A264.
- 3.6 Three illustrative masterplans have been submitted within this application which provide indicative illustrations as to the potential outcome of the Proposed Development. It is intended that this Outline Planning Permission provides flexibility in terms of what may eventually come forward within the defined parameters to best respond to market demand and need, ensuring deliverability.
- 3.7 These options provide for an office-led scheme, an industrial/ logistics park, or a hybrid approach combining elements of the two.
- 3.8 Common across all three options are the commercial leisure facility (providing a range of indoor and outdoor sports facilities and swimming pools in Parcel 5) and health centre (Parcel 4), which are situated in the Site's western-most extent in proximity to the access to the Sports Hub. The commercial leisure facility is situated in the south-western parcel of the Employment Land, immediately adjacent to the constructed Li-Lo junction with the A264. The health centre is positioned directly opposite, on the north-westernmost parcel.
- 3.9 The design evolution and vision of the Proposed Development is covered more comprehensively within the submitted **Design and Access Statement**.

3.10 The illustrative masterplans have been provided to demonstrate the maximum extent of development which could be achieved. The indicative floor areas for each of these options are provided below as gross internal area (GIA):

Use / Use Class	OPP	Option 1 Commercial	Option 2 Industrial and Logistics	Option 3 Commercial, Industrial and Logistics
Business Park (B1 under OPP; now E(g))	46,450m ²	46,450m ² E(g)(i) office	4,306m ² E(g)(iii) light industrial / office	22,384m ² comprising: 18,078m ² E(g)(i) office 4,306m ² E(g)(iii) light industrial / office
B2 / B8 Industrial/ Logistics	0m ²	0m ²	42,452m ²	26,615m ²
Commercial Leisure	5,100m ²	5,300m ²	5,300m ²	5,300m ²
Health Centre	2,000m ²	2,000m ² plus 70m ² pharmacy	2,000m ² plus 70m ² pharmacy	2,000m ² plus 70m ² pharmacy
	Total	53,820m²	54,128m²	56,369m²

Table 1: Indicative Maximum Floor Areas by Use Class

3.11 The above table provides the combined floor area figures across the various employment uses proposed. The below provides a more detailed breakdown of uses within individual parcels, other parcel-specific features and a more detailed description of the Proposed Development generally:

- **Parcel 1:**
 - 3.51ha with the potential to provide B2 General Industrial, B8 Storage/ Distribution and/ or E(g) Commercial, Business and Service uses;
 - Two access points from the northern arms of the Employment Road roundabouts;
 - New green infrastructure along the southern, eastern and northern boundaries
- **Parcel 2:**
 - 6.58ha with the potential to provide B2 General Industrial, B8 Storage/ Distribution and/ or E(g) Commercial, Business and Service uses;
 - Two access points from the southern arms of the Employment Road roundabouts;
 - Potential to subdivide with a secondary street running east-west through the centre of the Parcel

- **Parcel 3:**
 - 1.28ha of E(g) Commercial, Business and Service uses to provide a transition to the relocated Station Land/ car park and future alternative development of the Station Land and OPP residential Sub Phase 2D;
 - Access from the southern arm of the second Employment Road roundabout
- **Parcel 4:**
 - 0.60ha of E(e) Medical/ Health Services (including a pharmacy) with E(g) Commercial, Business and Services as an alternative if healthcare uses do not come forward;
 - Retained green infrastructure within the Parcel save for where removal is required to provide access between the northern and southern parts (precise location to be agreed at RM/ detailed stage);
 - Access from a bellmouth junction north from the first stretch of the Employment Road
- **Parcel 5:**
 - 2.49ha of Commercial Leisure comprising Use Class E(d) Indoor Sports, Recreation or Fitness, F2(c) Areas or Places for Outdoor Sports or Recreation and F2(d) Indoor or Outdoor Swimming Pools;
 - New green infrastructure adjacent to the Li-Lo;
 - Retained green infrastructure within the Parcel save for where removal is required to provide access between the eastern and western parts (precise location to be agreed at RM/ detailed stage);
 - Existing PRoW to be diverted to the east to the location approved through the Employment Road planning permission;
 - Access from a bellmouth junction south from the first stretch of the Employment Road
- 1.88ha Strategic Green Buffer with landscape scheme provided in detail which proposes retention of existing trees, hedgerows and areas of grass to be augmented with areas of species rich grassland and scrub planting
- Biodiversity Net Gain of 10% to be achieved through a mix of on-site improvements and off-site credits
- Connections to Employment Road for vehicles and associated foot/ cycle ways
- Surface water drainage to be managed through a combination of SUDS technologies (to be agreed at the RM/ detailed stage)

- Foul drainage to connect to the foul infrastructure approved as part of the Employment Road
- Indicative levels strategy with final levels, associated earthworks and structures to be agreed at the RM/ detailed stage
- Car and cycle parking having regard to the latest WSCC standards
- Energy strategy estimated to achieve between 14% and 29% carbon savings (based on three indicative masterplan options) through Be Lean, Be Clean and Be Green measures

Delivery Strategy/ Severability of Parcels

- 3.12 L&G is master developer for Mowbray, delivering enabling and strategic infrastructure to create serviced land parcels that are then sold to developers to take forward for detailed/ RM approval and deliver. To facilitate this approach, the parcels on the Employment Land have been designed to be distinct and severable from each other. This would not preclude a single developer taking forward the three employment parcels (Parcels 1 to 3) in combination (for example) but would also allow for these to be sold to three different developers/ operators. Likewise, the healthcare parcel (4) and commercial leisure parcel (5) have been designed to operate independently of the other parcels in planning terms and operation. They provide for different Use Classes that are not dependent nor related to each other. The Employment Road, a separate planning permission, provides for the active travel connections and vehicular access to the parcels, again removing any interrelationships in this regard.
- 3.13 It is envisaged that the employment parcels (1 to 3) and healthcare parcel (4) will come forward for RM approval following determination of this outline planning application. However, owing to timing and contractual obligations, the commercial leisure parcel is looking at an expedited programme and start on site. Whilst this parcel could come forward for RM approval following determination of the outline application if timings allowed, the outline application has been structured to also facilitate a separate application for full permission that could run in parallel and be approved in advance.
- 3.14 This approach has been developed having regard to the *Hillside*¹ judgement. The disaggregation of the commercial leisure parcel (5) from the other parcels (and other parcels from each other as may be required) through planning conditions and obligations will be discussed further with the Local Plan Authority during its consideration of the application(s).

Pre-Application Engagement

- 3.15 A **Statement of Community Engagement** is enclosed within the submission which sets out how L&G engaged proactively with stakeholders including the local community and elected representatives to inform the current Proposed Development. This includes in-person meetings with local Parish's, public consultation events, and wider communications through email and leaflets to raise awareness and invite comments.

¹ [Hillside Parks Ltd \(Appellant\) v Snowdonia National Park Authority \(Respondent\) - UK Supreme Court](#)

- 3.16 Ward Councillors from Roffey North were generally supportive of the proposals at an in-person event in December 2025. The benefits that the Proposed Development could deliver to the area was acknowledged, noting that the weakened demand for commercial office space post-Covid and agreeing a flexible solution a suitable alternative.
- 3.17 L&G undertook early engagement with HDC, as the Local Planning Authority, through a formal pre-application meeting and subsequent discussions facilitated by a long-term Planning Performance Agreement. Officers supported the additional proposed uses and the flexibility embedded within the Development's potential end uses, recognising this as a means of aiding delivery, ensuring that the District's identified need for employment floorspace is met. The emerging proposals were also discussed with HDC's enterprise team, who were particularly supportive of the diversification of uses, and with WSCC Highways.

Parameter Plans

- 3.18 Three Parameter Plans have been submitted for approval within this application to establish a baseline for the Proposed Development:
- Parameter Plan 1: Land Uses
 - Parameter Plan 2: Access and Movement
 - Parameter Plan 3: Building Heights
- 3.19 These represent the basis upon which the various technical elements have been assessed in the accompanying Environmental Statement ('ES').
- 3.20 The Proposed Development has been designed to incorporate a degree of flexibility capable of adapting to changing markets and therefore meet the demands of a range of businesses. The Development explores a range of uses including industrial, logistics and office spaces to ensure the Site can deliver a range of economic benefits in response to market demands and district needs. Commercial leisure and healthcare are consistent across the scenarios tested.
- 3.21 Parameter Plan 1 provides the outline layout of the proposed uses. The two westernmost land parcels provide the Health and Commercial Leisure parcels (Parcels 4 and 5 respectively) which will act as the gateway to the Employment Land from the A264 when accessed from the Li-Lo. The easternmost parcel (Parcel 3) is proposed to provide Class E(g) uses which will offer a buffer to other uses to the east, including eventual residential within Phase 2, from potential industrial and logistics uses. It is anticipated that Parcel 3 will comprise office or light industrial/ research and development and, given its smaller size, could be attractive to smaller business/ start-up units. No other uses are proposed on these three parcels.
- 3.22 The two largest parcels, which are situated centrally within the Site (Parcels 1 and 2), are afforded some flexibility within the proposed parameters. The Land Use Parameters provide for any of B2, B8, or E(g) uses within these areas. Final uses will be confirmed at Reserved Matters stage subject to demand/ need at that time. There are multiple ways in which these Parcels could be subdivided to accommodate multiple end-users or a single end-user but with multiple buildings.

- 3.23 The southernmost parcel would not provide any uses and acts as a Strategic Green Buffer from the A264 consistent with the Strategic Landscape Buffers Plan (referenced in Conditions 6 and 46 of the OPP: ref. 2898-5-2-S4-P1-DR0001) where it is shown as the “Station Buffer”.
- 3.24 Parameter Plan 2 details the Movement and Access provisions across the Site. Most transitory routes across the Employment Land fall within the Employment Road application and have been approved pursuant to that application.
- 3.25 Only the southern central parcel (Parcel 2) providing flexible uses is shown to have routes of the Movement and Access Parameter Plan. These include a potential Secondary Link Road which adjoin the two roundabouts of the primary road in a U-shape which leads down in the centre of the parcel, across, and back up to meet the second roundabout. Potential cycleways lead from the junctions of the Secondary Link Road south to join the cycleway and pedestrian footpaths proposed under the full application of the Primary Road.
- 3.26 The proposed Building Heights parameter plans provide for buildings up to 16m, excluding rooftop plant. This is the same as approved by the OPP, which ensures that the Development would not result in significant impacts to landscape, or impacts above those envisaged within the Environmental Statement of the OPP.

4 PLANNING POLICY

4.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the provisions of the development plan unless material considerations indicate otherwise.

4.2 The development plan comprises:

- Horsham District Planning Framework 2015

4.3 Material considerations include:

- National Planning Policy Framework 2024 (as amended; '**NPPF**')
• Planning Practice Guidance (last updated February 2024; '**PPG**')
• Local Supplementary Planning Documents ('**SPD**')

Adopted Planning Policy

4.4 Land North of Horsham is identified as a strategic allocation by Policy SD1 of the Horsham District Planning Framework to deliver a mixed-use development. The key development principles outlined in Policy SD1 can be summarised as:

1. High quality, sustainable, mixed-use community with its own identity and character but connected to Horsham
2. Locally distinctive and unique through its architecture, urban and landscape design
3. Legible layout that facilitates modes of sustainable travel
4. Minimal impact on existing transport network with new crossings of the A264
5. Business Park
6. Safeguarded land adjacent to the business park for a new parkway railway station
7. Local centre including shops, healthcare and community facilities
8. Homes of different sizes, types and tenure to meet local needs
9. Two primary schools and a site for a secondary school together with provision for Special Education Needs
10. Open space, sport and recreation facilities
11. Strong landscape buffer
12. Sequential approach to flood risk

4.5 Additional policies that specifically relate to the Land North of Horsham are SD2 to SD9. These policies set out more detailed provisions for the Site in respect of, *inter alia*, employment, the local centre, housing, sports, landscape, design, education and transport.

Policy SD2: Employment and Business Opportunities

Relates only to 'Employment and Business Opportunities' within the Land North of Horsham allocation and offers support within the development plan for the provision of a new high-quality business park on the Site for approximately 46,450m². The policy does not specify uses.

Policy SD6: Landscape Buffer, Landscape Character, Biodiversity and Green Infrastructure

A landscape buffer is to be provided to provide a long-term defensible boundary to the development and prevent coalescence between Horsham and Crawley. The development should also respond to and compliment the positive landscape characteristics of the site, and strategic landscape proposals are to be provided in key locations to mitigate the development's visibility from the A264.

Policy SD7: Design

Sets the design principles against which development within the Land North of Horsham allocation is expected to accord. This includes ensuring that developments are high-quality, well-designed, and respond to and complement Horsham's local distinctiveness.

- 4.6 This application for Outline Planning Permission proposes mixed commercial, industrial and logistics, health, and commercial leisure facilities. Other key adopted policies in this regard are:

Policy 9: Employment Development

The provision of small, start-up or move-on business units will supported.

Policy 24: Environmental Protection

The environmental quality of the district is to be protected from development impacts through, inter alia, the minimisation of air pollution and greenhouse gas emissions, and the prevention of contaminated run-off to surface water sewers.

Policy 25: The Natural Environment and Landscape Character

Protects the landscape and natural environment from inappropriate development and seeks to protect, conserve and enhance the landscape, maintain and enhance the Green Infrastructure Network, ensure no net loss of biodiversity, delivering net gains where possible, and maintains and enhances the existing network of geological sites.

Policy 26: Countryside Protection

Proposals must be of a scale appropriate to its countryside character and location. Development will be considered acceptable where it does not lead, either individually or cumulatively, to a significant increase in the overall level of activity in the countryside, and protects, and/or conserves, and/or enhances, the key features and characteristics of the landscape character area in which it is located.

Policy 31: Green Infrastructure and Biodiversity

Requires development proposals to contribute to the enhancement of existing biodiversity and the creation of new habitats where possible. Any trees lost as a result of the development are to be replaced.

Policy 32: Quality of New Development

Development is expected to reflect an understanding of local, physical, social, economic, environmental and policy context for development.

Policy 33: Development Principles

There are several principles set out within this policy. Relevant to this application, the appearance of development is required to respond to built surroundings and landscape features, offer a high standard of landscaping, and presume in favour of retaining existing landscape and natural features.

Policy 34: Cultural and Heritage Assets

The LPA expect to sustain and enhance its heritage assets through positive management of developments. The LPA expect to achieve this by ensuring development proposals retain and improve the setting of heritage assets, including views, Public Rights of Way, trees and landscape features.

Policy 35: Climate Change

Supports development which makes a clear contribution in adapting to climate change, including measures which reduce energy use in construction (1), provide appropriate flood storage capacity (1), support the use of sustainable transport methods (4) *inter alia*.

Policy 36: Appropriate Energy Use

All development in Horsham is expected to contribute to clean efficient energy use through the adoption of the Lean, Clean and Green hierarchy. All applications for commercial developments are required to include an Energy Statement within their submissions to demonstrate how the development would comply with the Energy Hierarchy.

Policy 37: Sustainable Construction

Requires proposals to seek sustainable improvements by introducing design features to minimise vulnerability to flooding and heatwave events (3), encourage walking, cycling and other forms of sustainable transport (5), and incorporate measures to improve biodiversity value (8).

Policy 38: Flooding

Sets of how development which could result in increased flood risk should incorporate the use of SuDS features to mitigate that risk (3), and in doing so, should consider the importance of local ecological resources such as water quality and biodiversity (4). Drainage techniques that mimic natural drainage patterns and manage surface water close to source should also be adopted (5).

Policy 39: Infrastructure Provision

This policy highlights that in the event of need for additional capacity, the infrastructure will need to be provided in time to serve the development (or relevant phase) to ensure the existing environment or amenities are not adversely affected (2).

Policy 40: Sustainable Travel

Supports developments which maintains and improves existing transport system by road, rail and cycle (2), is integrated into the wider network of routes (3), includes opportunities for sustainable transport to cut emissions (4), located where there are a range of transport options available (5), minimises conflict between traffic, cyclists and pedestrians (6), and provides safe and suitable access for vehicles, pedestrians, cyclists (9).

Policy 41: Parking

Adequate parking facilities must be provided within development sites to meet the needs of anticipated users. Parking strategies should demonstrate consideration of the needs of cycle and motorcycle parking, charging plug-in or other low emission vehicles and the mobility impaired.

Policy 43: Community Facilities, Leisure and Recreation

The policy supports the provision of new or improved community facilities or services to meet the identified needs of local communities and or contribute to the provision of Green Infrastructure.

Joint Minerals Local Plan 2018 (Updated 2021)

- 4.7 The Joint Minerals Local Plan is a result of a partnership between West Sussex County Council and the South Downs National Park Authority. The plan covers up to 2033 and provides the Authorities' approach to land-use planning for minerals. Its contents as relevant to this application are set out below.

Policy M9: Safeguarding Minerals

Safeguards soft-sand, sharp sand and gravel, brick making clay, building stone resources chalk reserves against sterilisation. Non-mineral development within Minerals Safeguarded Areas will not be permitted unless mineral sterilisation would not occur, it is appropriate or practicable to extract minerals prior to the development taking place, or the need for the development outweighs the safeguarding of the minerals and prior extraction is not practicable or environmentally feasible.

Emerging Development Plan

- 4.8 The Council commenced a review of its local plan in 2018. Regulation 18 consultation took place in February/ March 2020. Regulation 19 consultation took place between January 2024 and March 2024 and the Submission Version Local Plan was submitted to the Secretary of State for Examination in August 2024. The initial hearing sessions were held in December 2024, and the Inspector subsequently wrote to HDC to recommend withdrawal of the draft Plan (see letter dated 4 April 2025) on the basis that Duty to Cooperate had not been met.
- 4.9 However, the Written Ministerial Statement on Reforming Plan Making and the Minister of State's letter to the Planning Inspectorate of 27 November 2025 sets out that the Government's intention is to abolish the Duty to Cooperate in the plan-making system.
- 4.10 Considering this, and Natural England's withdrawal of their water neutrality position statement, the Planning Inspectorate recommenced examination of the Submission Local Plan with higher growth targets. The first of these hearings took place on 21 April 2026. Consultation on Main Modifications

runs until 24 August 2026. The next stage of hearing sessions are anticipated for the Autumn with the Council's current timetable targeting early 2027 for adoption.

- 4.11 NPPF (2024) paragraph 49 states increased weight can be attributed to the emerging policies as they progress towards adoption depending on the extent of unresolved objections. Whilst discussions between HDC and the Planning Inspectorate may continue, it is not yet clear whether previous objections will be overcome. Limited weight can currently be attributed to its policies.
- 4.12 In parallel to examination of the draft Local Plan, the Council has commenced work on a new local plan pursuant to the new plan-making regime. Scoping Consultation is underway. This is at a very early stage and thus no weight can currently be attributed to it.

Draft National Planning Policy Framework

- 4.13 The Ministry of Housing Communities and Local Government published a draft National Planning Policy Framework on 16 December 2025. The document contains proposed reforms and changes to the English planning system.
- 4.14 The draft NPPF and the policies contained therein are a material consideration in the context of decision making. However, given that the document remains in draft, and may be subject to amendments following the consultation earlier in 2026, it attracts only very limited weight at this time.

Biodiversity Net Gain

- 4.15 As of 12th February 2024, all new major development is mandated to achieve a minimum 10% Biodiversity Net Gain, as set out within the Environment Act 2021 and Schedule 7A of the Town and Country Planning Act 1990.

5 Case for Development

Principle of Development

- 5.1 A similar development proposal has previously been found acceptable following its approval under the OPP. The decision to grant permission for the OPP was made 1 March 2018. The local policy context remains largely the same. National policy, insofar as it relates to the proposed development, has also not materially changed.
- 5.2 The Site remains allocated under Policy SD1 of the HDPF which states that (point 5) ‘a business park shall be provided in order to enable the opportunity of working locally, to reflect the needs of the economy’. The Site falls within the ‘Employment’ area of the allocation as shown on the HDPF Concept Masterplan. Policy SD2 highlights how the OPP site should provide a “business park” to provide approximately 46,450m² of employment floorspace. On the basis of need/ demand at the time of the OPP, it included 46,450sq.m (GIA) of Use Class B1 floorspace, envisaging an office-focussed business park (also including other components of Use Class B1 such as research and development and light industrial).
- 5.3 The market for office floorspace has significantly changed since the OPP was approved with Covid-19 accelerating a shift to more home/ hybrid working. Whilst office attendance has increased in the intervening years, the market for office accommodation of the scale originally proposed at Mowbray remains weak. Conversely, the market for industrial and logistics uses has increased, which is reflected in the Council's draft Local Plan evidence base and topic papers (see Employment Topic Paper, March 2026). Factors such as limit availability of existing space and future supply in Crawley and expansion at Gatwick Airport will likely see this trend continue. Thus, in recognition of the changing needs of the local/ regional economy, and in compliance with HDPF Policy SD1(5), the Proposed Development seeks to broaden the range of employment uses at Mowbray. The range of uses continues to include offices, research and development and light industrial (now Use Class E(g)) but also extends to general industrial and logistics/ distribution. The aim being to provide flexibility as to the end-uses to meet needs/ demand at the time of delivery and provide a viable employment park for the District.
- 5.4 The Proposed Development also seeks express permission to provide a healthcare facility in this part of the Mowbray site. Healthcare was approved as part of the mix of uses at Mowbray but envisaged within the Village Centre in Phase 1. However, it was recognised that this may not be achievable with the s106 making provision for a healthcare facility in the Employment Land if not provided in the Village Centre. The scale of facility sought by a local GP practice, including notable car parking, is not compatible with the Village Centre and is now proposed on the Employment Land.
- 5.5 Likewise, a commercial leisure facility was envisaged in Phase 1 on the eastern side of Rusper Road and is allowed for in the mix of uses on the OPP Land Use Parameter Plan. To provide a viable supermarket in Phase 1, there is no space remaining in the location envisaged for a commercial leisure facility. This is now proposed in Parcel 5 in proximity to the entrance to the Sports Hub and healthcare parcel (Parcel 4) to provide for a health, sports and wellbeing cluster. This provides a range of facilities and services to meet the needs of the Mowbray and wider community as required by HDPF Policy SD1.

- 5.6 The Proposed Development aligns with the approved Employment Road (LPA reference DC/25/1543) which will facilitate access to residential Phase 2 of the OPP and provide the foot/cycle connections to deliver wider connectivity improvements as provided for in the Site-Wide Cycling Strategy (approved pursuant to OPP Condition 19; LPA reference DISC/22/0232).

Consistency with OPP Parameters

- 5.7 This application for Outline Planning Permission is made separate to the OPP of the Mowbray (LPA reference DC/16/1677). The Development is not therefore required to demonstrate accordance with the approved parameter plans of the OPP. Nonetheless, the scheme has been developed to broadly accord with the approved parameters to ensure the Proposed Development remains cohesive with adjacent parcels and the wider Mowbray development.
- 5.8 Condition 2 of the OPP requires that the detailed design of the development proposed through Reserved Matters applications 'shall have regard to, and broadly accord with, the principles set out in the following parameter plans and supporting documents'. The Parameter Plans (as amended by LPA reference DC/24/0876) are:
- Land Use Parameter Plan (2153A-100Q)
 - Density (drawing reference 2153A-101P)
 - Building Heights (drawing reference 2153A-102S)
 - Movement and Access (drawing reference 2153A-103S)
 - Green Infrastructure (drawing reference 2153A-105R)
- 5.9 The land comprising the Development's parcels is identified as 'Commercial' on the Land Use Parameter Plan (100Q). The Movement and Access Plan (103S) identifies an existing PRow footpath leading through the centre of the Site, leading north and adjoining to an existing bridleway which follows the Site's northern boundary. The Employment Road extends through the centre of the Site, adjoining the Li-Lo junction of the A264 towards the Site's west, to Wimland Road towards the Site's east. This Employment Road and associated footpaths and cycleways demonstrate broad accordance with these parameters. The Proposed Development has been designed around the Employment Road and broadly accords with the OPP parameters in this regard.
- 5.10 The Green Infrastructure Parameter Plan (105R) illustrates an attenuation basin within the centre of the Employment Land on the northern side of the Primary Road, areas of woodland dispersed around its perimeter, and an area of Ancient Woodland on its northern boundary, on either side of Channels Brook. Upon interrogation, the optimum location for an attenuation basin of the scale required is in the northeast corner of the Employment Land. This has been approved through the Employment Road permission and allows a key hedgerow running through the centre of the Employment Land to be retained and augmented with landscaping adjacent to provide betterment over the OPP parameters. In all other respects the configuration of green infrastructure through the Employment Road permission and this Employment Land outline application broadly accord with the OPP.

- 5.11 Building Heights within the Employment Land were permitted to extend up to 16m (excluding rooftop plant) as shown on the OPP Building Heights Parameter Plan (102S) +/- 2m. The Proposed Development includes a new Building Height Parameter Plan which is the same as the OPP in that it provides for buildings up to 16m excluding rooftop plant. However, the levels across the Employment Land have been interrogated in further detail compared to the OPP and it is apparent that a greater tolerance is required. This is proposed as +2m/ -6m from existing ground level AOD. The lowered land level may be required in parts of the Site if larger format buildings are proposed at the RM stage to avoid level changes within buildings. The upper tolerance remains the same and will ensure that visibility and landscape impacts remain consistent with those assessed and found to be acceptable through the OPP.
- 5.12 The s106 requires that land is reserved within the eastern part of Mowbray for a prospective future train station, shown in yellow on Plan 12 – Railway Station and Car Park of the s106. Adequate land has been retained for this purpose, illustrated as “Railway Station and Car Park Land / Future Development” on the submitted plans. That land is outside the red line of this application but the Proposed Development and associated parameters have been developed so as not to fetter or prejudice that land coming forward for a train station or such alternative use as allowed for in the s106 should the station safeguarding (as is anticipated) be lifted.

Matters of Detail

- 5.13 The proposed works include the provision of as Employment Park, comprising industrial and logistics uses, commercial offices, or a combination of both, in addition to commercial leisure and healthcare facilities. The matters of detail to be assessed in this regard are:
- Design
 - Trees
 - Landscape and Visual Amenity
 - Highways and Parking
 - Energy and Sustainability
 - Flooding and Drainage
 - Biodiversity Net Gain
 - Heritage
 - Minerals

Design

- 5.14 This application is supported by a **Design and Access Statement** which details the design development and technical considerations which informed the evolution of the Development.

- 5.15 Three Illustrative Masterplans have been provided to help demonstrate how the final development could materialise under the proposed parameters. All options comprise provide Class E(g) on the eastern parcel, and health and commercial leisure on the western parcels in accordance with the proposed land use parameters.
- 5.16 The three Illustrative Masterplans illustrate that the flexibility in uses applies principally to the central land parcels, on either side of the Employment Land Road.
- 5.17 Option 1 illustrates an Office Led masterplan. This use would require the most parking provision. The illustrative masterplan demonstrates how the visual impact of the parking could be mitigated through extensive tree planting and landscaping across the Site. Moreover, the Illustrative Masterplan highlights how the office buildings could be positioned facing onto the Employment Land Road, with car parks positioned behind.
- 5.18 Option 2 effectively demonstrates how a mixed employment development led by industrial and logistics uses would be able to achieve a cohesive and integrated development alongside the Class E(g), health and commercial leisure uses.
- 5.19 The Design and Access Statement provides for a range of options that could eventually be constructed on each respective flexible plot in order to best respond to the demands of the market. Whilst these are illustrative only, the options demonstrate that high-quality developments could be provided within the proposed parameters.
- 5.20 It should be noted that this the Development is applied for in outline, and detailed design is to occur at the Reserved Matters Stage. However, as set out in the Design and Access Statement, the Development intends to continue the design principles established under Phase 1 of the OPP, and includes a range of principles that will aid high-quality place-making.
- 5.21 This includes façade strategies to aid legibility and wayfinding by ensuring buildings, including warehouses, address the Primary Road through the centre of the Site. This will be paired with an architecture and material strategy which seeks to deliver consistency and cohesiveness across the Site, while providing visual interest through varied materials and architectural features. The Design and Access Statement provides these strategies in detail, which differ depending on potential end uses.

Trees

- 5.22 The Site comprises several fields divided by mature hedgerows within which there are a number of individual mature trees.
- 5.23 The Ancient Woodland of Bush Copse, also subject to a group Tree Preservation Order, covers an area to the north-west of the Site, though there remains sufficient distance between the Site and the woodland that the Development would not have any negative impact.
- 5.24 No trees within the Site are subject to protection through Tree Preservation Orders or from being within a Conservation Area.
- 5.25 As stated in the **BS:5837 Arboricultural Impact Assessment ('AIA')** (and demonstrated on the Illustrative Masterplans) the Development seeks to presume in favour of the retention of trees and landscape features.

- 5.26 The parcel plan for the Site largely follows the existing field boundaries to retain both the landscape character of the Site, and any existing trees and hedgerows.
- 5.27 Where development may be required within the RPA of any trees to be retained, protection measures are provided within the AIA. The AIA nonetheless highlights the importance and intention of ensuring any final designs do not incur over 20% of any trees' root protection area.
- 5.28 The Development has been designed such that future detailed designs can come forward without detriment to the arboricultural value of the Site. A clear presumption in favour of retaining existing trees and hedgerows in and around the Site has been demonstrated. Mitigation measures have been proposed that ensure construction activities can be carried out without detriment to trees long term health. The proposal therefore demonstrates accordance with HDPF Policy 33 and Paragraph 136 of the NPPF.
- 5.29 The Illustrative Masterplans demonstrate how meaningful landscaping can be achieved on Site through extensive soft landscaping and tree planting, which would likely result in an overall improvement to the landscaped quality of the Site.

Landscape and Visual Amenity

- 5.30 Policy SD6 relates specifically to the Mowbray development site. To comply with this policy, it is necessary to provide a strategic landscape buffer between the Site and the A264 to mitigate the developments visibility from the A264.
- 5.31 Policies 25 and 26 of the HDPF relate to the protection of landscape character, the natural environment and the countryside. Development proposals should seek to protect, conserve and enhance landscape character, and be of a scale appropriate to a site's location.
- 5.32 Paragraph 135 of the NPPF reaffirms this requirement, setting out how decisions should be taken to ensure developments are sympathetic to local character and history, including surrounding built character and landscape setting.
- 5.33 Chapter 15 provides the national policy framework for the conservation and enhancement of the natural environment. Paragraph 187 provides the means to this end, encouraging development proposals to show consideration of the intrinsic character and beauty of the countryside.
- 5.34 This application is accompanied by a **Landscape and Visual Impact Assessment ('LVIA')** which assesses the impact of the Development on landscape character and visual amenity.
- 5.35 The Site falls within the Northern Vales Landscape Character Area which is characterised by a flat to gently undulating narrow clay vale, scattered tree cover, distinctive field trees, major road and rail corridors, and strong suburbanising influences from Horsham, Crawley and Gatwick Airport.
- 5.36 Strategic landscape buffers were proposed within the OPP to mitigate the potential landscape impacts arising from the development of Mowbray, illustrated in the Strategic Landscape Buffers Plan. This shows a strategic buffer along the south-eastern boundary of the Site, between the railway line and the south-eastern red-line boundary and referred to as the 'Station Buffer'. The buffer is proposed to be implemented pursuant to this application, and therefore the same mitigation proposed and deemed acceptable in the OPP has been retained for this application. Moreover, the

height parameters and site area remain the same as those of the OPP, and any resultant impact are likely to be the same in worst-case.

- 5.37 As a result of the mitigation, paired with the enclosed and well landscaped nature of the existing site, the short-term effect of the development on landscape character is predicted to be medium-low, reducing to a low magnitude of effect in the long-term as landscaping, including that of the Station Buffer, matures.
- 5.38 The topography and the extensive landscaped nature of the Site's surroundings limits views into the Site from beyond the immediate vicinity or the Site's boundary. Visual receptors that may be negatively affected by the development all lie within 200m of the Site. The effect on receptors beyond this is predicted to be minor or nil.
- 5.39 The OPP was accompanied by an LVIA. The decision reached by HDC in approving the application confirms that any landscape and visual effects arising from development in this vicinity were deemed to be acceptable. The LVIA submitted within this application demonstrates a similar impact between the same parameters and mitigation measures. The Development retains high quality landscape features and would retain the amenity value of visual receptors beyond the immediate vicinity of the Site. The development is therefore in accordance with Policies 25 and 26, Paragraph 135 of the NPPF.
- 5.40 The proposed strategic landscape buffer accords with the OPP requirements and offers a visual buffer between the A264 and the Site. The development therefore accords with Policy SD6.

Highways and Parking

- 5.41 Policy 40 of the HDPF encourages the integration of sustainable transport options into development proposals through improvements to existing infrastructure, integration into wider routes, and the provision of safe and suitable access for all modes of transport. Policy 41 requires that adequate parking facilities are proposed within development sites to meet the needs of anticipated users. Parking strategies should demonstrate consideration of the needs of cycle and motorcycle parking, charging plug-in or other low emission vehicles and those of impaired mobility.
- 5.42 Chapter 9 of the NPPF similarly seeks to promote sustainable transport. Paragraph 117 sets out a transport hierarchy, prioritising pedestrian and cycle movements first, and facilitating access to public transport services. Consideration should also be given to people with disabilities and those of reduced mobility. Steps should be taken to minimise potential for conflict between pedestrians, cyclists and vehicles.
- 5.43 Where developments will generate significant amounts of movements, a travel plan should be provided as set out in Paragraph 118.
- 5.44 Paragraph 116 highlights that development should only be refused on highways grounds where there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, accounting for all reasonable future scenarios.

- 5.45 A **Transport Assessment** is provided which satisfies the requirements of Paragraph 118. The assessment has been informed by early engagement with West Sussex County Council as the relevant highway authority.

Access

- 5.46 Primary access to the Site is gained from the A264 through the recently constructed Li-Lo and the **Primary Road** currently under consideration under LPA reference DC/25/1543. The Primary Road offers access to buses and HGV's and features two four-arm roundabouts which provide access to the north and south of the Primary Road and into the Site. Four bellmouth junctions spread across the northern and southern side of the Primary Road offer access to specific parcels.
- 5.47 A Site-Wide Cycling Strategy was approved pursuant to an application to discharge Condition 19 of the OPP (LPA reference DISC/22/0232). The strategy requires a cycle and pedestrian route along the northern side of the A264, which is provided within the southern extent of the Site. The existing PRoW (Footpath 1586) is to be diverted under Section 257 of the Town and Country Planning Act 1990 post-consent to facilitate the delivery of the western parcels of this Development and accord with the alignment of the strategy. Cyclists will be granted permissive rights to use this section of the diverted PRoW, as well as a section of footpath on the northern side of the Primary Road to ensure a cohesive and complete cycle route across the Site. Whilst this application is made separate, the Development maintains clear accordance with the strategy.
- 5.48 Cyclists within the Development on the secondary road network will share the road space with motor vehicles in accordance with the site-wide cycle strategy.
- 5.49 A 2.5m wide two-way cycleway and 2m wide parallel segregated footway are provided on the northern side of the primary road, extending across the full width of the Employment Land. A 2m wide footway along the southern side of the Primary Road. Several uncontrolled pedestrian and cycling crossings are scattered across the length of the Primary Road to facilitate north/south travel. It should be noted that these elements are subject to consideration under the application for the Primary Road, however this does clearly demonstrate safe and suitable access into the Employment Land can be achieved for all highway users.

Traffic Movements

- 5.50 Option 1 would generate the same number of vehicle movements throughout the day as the Business Park masterplan within the OPP.
- 5.51 Option 2 provides an alternate use, which would result in 288 fewer movements in the AM peak, and 91 fewer movements in the PM peak. However, the industrial use would provide a more consistent flow of traffic throughout the day than the OPP baseline, which would result in an uplift of 1,770 movements across the day.
- 5.52 Option 3 provides a similar impact as Option 2, with 139 fewer movements in the AM peak, and 26 fewer in the PM peak, though an overall uplift throughout the day of 1,384 movements.
- 5.53 Moreover, traffic movements generated by the OPP Business Park and proposed Option 1 would consist primarily of light vehicles. The introduction of B2/B8 uses would result in a higher proportion of HGV movements. The resultant impact on traffic flows compared to the baseline is minimal at peak times, with traffic flows for both Options 2 and 3 lower than the OPP baseline in AM and PM

peaks. However, daily traffic movements for Options 2 and 3 do result in an uplift above the OPP baseline, with 3,053 additional daily movements for Option 2, and 2,208 additional daily movements for Option 3.

- 5.54 The OPP delivered several off-site highway improvements to mitigate potential highway impacts associated with the Mowbray development. The resultant uplifts in daily traffic movements does not have any impact on the operational capacity of key junctions as overall traffic flows at peak times will be lower. No additional mitigation measures or highway improvements are necessary to mitigate the impact of traffic flows from the Development. The proposal therefore complies with Policy 40 of the HDPF and Chapter 9 of the NPPF. No significant highway impacts either singular or cumulative will arise from the Development.

Parking

- 5.55 Expected parking provision is set out within WSCC's Guidance on Parking at New Developments (September 2020) document, which requires the following (as may be relevant to the Development):

Use Class	Vehicular Spaces	Cycle Spaces
B2 General Industrial	1 space per 40sqm	1 space per 200sqm for staff and 1 space per 500sqm for visitors
B8 Storage	1 space per 100sqm	1 space per 500sqm for staff and 1 space per 1000sqm for visitors
E Commercial, Business and Service – Business (office, research and development and light industrial process)	1 space per 30sqm	1 space per 150sqm for staff and 1 space per 500sqm for visitors
E Commercial, Business and Service – Non-residential institutions (medical or health services, crèches, day nurseries and centres)	Site-specific assessment based on travel plan and needs	Site-specific assessment based on travel plan and needs
E Commercial, Business and Service – Assembly and Leisure (indoor sport, recreation or fitness, gyms)	1 space per 22sqm.	1 space per 4 staff plus visitor/customer cycle parking

Table 2: WSCC Guidance on Parking at New Developments (September 2020) Standards

- 5.56 327 spaces are proposed for the leisure facility, and 80 for the health centre. 3 sets out the parking provision against the policy requirements for the proposed options assessed for the most intensive uses. The full calculations, including uses, floor areas, and breakdown per building is provided within Appendix E of the Transport Assessment.

Masterplan Options	Policy Requirement	Proposed Provision	Difference
Option 1	1,548 spaces	1,689 spaces	+ 141 spaces
Option 2	568 spaces	632 spaces	+ 64 spaces
Option 3	1,012 spaces	1,059 spaces	+ 47 spaces

Table 3: Indicative Vehicular Parking Provision Against Policy Requirements

- 5.57 Cycle parking is provided in accordance with the cycle parking standards set out within WSCC Parking Guidance shown in 2 above.
- 5.58 The options therefore demonstrate that adequate parking can be provided on-site to meet the needs of anticipated users, in accordance with HDPF Policy 41.

Travel Plan

- 5.59 Condition 34 of the OPP requires a Phase Specific Travel Plan to be approved prior to the occupation of any phase in accordance with the Site Wide Framework Travel Plan.
- 5.60 It is proposed that specific Travel Plans will be prepared for each individual Reserved Matters Application, which can be secured by condition attached to this outline application.
- 5.61 An existing bus services operates within the Mowbray development which currently serves Phase 1 and Bohunt School. The service will be extended into the Employment Land and beyond into Phase 2, ultimately running on a loop through from Phase 1. Buses currently run on an hourly basis, though the frequency will increase to half-hourly upon occupation of the 840th dwelling, in accordance with the OPP s106.

Energy and Sustainability

- 5.62 Achieving sustainable development lies at the heart of the NPPF. While the approach to achieving sustainable development is multifaceted, an element of this includes the shift towards a low-carbon economy. To facilitate this shift, Paragraph 161 seeks to support a transition to net-zero by 2050 by taking full account of climate impacts including overheating, water scarcity, and contributions to a significant reduction in greenhouse gas emissions.
- 5.63 Policies 35, 36, and 37 of the HDPF provides the local approach to achieving these ambitions. Policy 35 supports developments which make clear contributions to adopting to climate change, including the use of site layout, design measures, and construction techniques that provide resilience to climate change. Policy 36 provides the expectation for all development in Horsham to contribute to efficient energy use through the adoption of the Lean, Clean and Green hierarchy, and the requirement for all applications for commercial developments to be accompanied by an

Energy Statement to demonstrate compliance with the hierarchy. Policy 37 requires the incorporation of measures to maximise energy efficiency, and natural ventilation and lighting.

- 5.64 An **Energy and Sustainability Statement** is submitted within this application which proposes recommendations regarding the approach to reducing carbon dioxide emissions and optimising energy efficiency within the Development. It should be noted that this application is in outline and detailed measures will come forward as part of subsequent Reserved Matters applications. Nonetheless, indicative energy modelling indicates that carbon savings of at least 14% above Building Regulations could be achieved through adoption of measures included in the energy strategy, summarised below.
- 5.65 A fabric first approach will be taken to building design to passively reduce energy demand. Thoughtful design of facades can be used to achieve an optimal balance between providing natural daylight benefits to reduce the need for artificial lighting, and passive solar heating to reduce heating demand. Appropriate levels of glazing will be used to prevent the need for space heating in winter, and cooling demands in summer. Designing buildings in this way demonstrates a “lean” approach to energy consumption.
- 5.66 The UK national grid has reduced its carbon intensity by around 70% since 2012. It is estimated that the grid would be zero-carbon by mid-2030. The Development would be low carbon on day one as a result, with carbon emissions reducing over the longer-term as decarbonisation continues, resulting in a “clean” supply of energy.
- 5.67 The adoption of air, ground or water source heat pumps and solar panels for example will likely be adopted in the final design of buildings, in compliance with the green arm of Policy 36.
- 5.68 The Development is therefore clearly able to help facilitate a shift to net-zero in accordance with Paragraph 161 of the NPPF and its overarching aims towards sustainability.
- 5.69 Adherence to the Energy Hierarchy which includes measures to maximise energy efficiency, could be readily achieved on the Development, subject to the confirmation of final details to come forward at the Reserved Matters stages. Compliance with Policies 35, 36, and 37 of the HDPF can therefore be demonstrated.

Flooding and Drainage

- 5.70 Policy 37 of the HDPF requires proposals introduce design features to minimise vulnerability to flooding to improve the sustainable credentials of developments. More specifically, Policy 38 emphasises the importance of adopting SuDS drainage features on sites which could result in increased flood risk. Such features should consider the importance of local ecological resources and should mimic natural drainage patterns and manage surface water close to source.
- 5.71 Chapter 14 of the NPPF reiterates the above. Paragraph 170 seeks to ensure that inappropriate development is avoided in areas at high risk of flooding, and that proposals do not increase flood risk elsewhere. Paragraph 175 provides that sequential testing should be undertaken in areas known to be at risk of any form of flooding, except where site-specific flood risk assessments demonstrate that no built development within the boundary, including access or escape routes, would be located on an area that would be at risk of any form of flooding.

- 5.72 Paragraph 182 encourages the use of SuDS on sites which could affect drainage on or around the site to control flow rates and reduce volumes of runoff.

Flooding

- 5.73 The Environment Agency Flood Maps show areas within the north of the Site adjacent to Channels Brook to fall within fluvial Flood Zones 2 and 3. Detailed hydraulic modelling was undertaken first in 2022, then in 2023, which is considered a more accurate method of determining flood extends than the Environment Agency's maps. The resultant flood maps from the Hydraulic modelling are contained within Appendix E of the submitted **Flood Risk Assessment**. No built development is proposed within areas at risk of fluvial flooding as shown on the Detailed hydraulic modelling. In accordance with the provisions of Chapter 14 of the NPPF, a sequential test is not required.
- 5.74 To ensure that any development is safe from the risk of flooding long-term, all buildings within the Development will be raised at least 300mm above the closest 1 in 100 year+ climate change flood event. Finished floor levels are to be confirmed in subsequent Reserved Matters applications, initial assessments indicate that finished floor levels could measure at least 80cm above a 1 in 100-year fluvial flood level (+45% climate change allowance).
- 5.75 The Site is generally at very low risk (1:1,000 annual exceedance probability) of surface water flooding according to the Environment Agency's surface water flood mapping. Some small pockets of the Site in valleys and topographical depressions are at higher risk, though these are unlikely to exist in practice with assessment indicating existing ditches and proposed culverts would have sufficient capacity to contain surface water flows from up-to-and-including 1 in 100-year flood events posing no risk to built development. Nonetheless, finished floor levels would be raised a minimum of 300mm above the closest surface water flood levels.
- 5.76 The Site is not at risk of any other forms of flooding. As the impacts of surface water and fluvial flooding are negligible and can be mitigated to ensure that buildings are not at risk of flooding, flooding does not pose any unacceptable risk to the Development, including in climate change events. Sequential testing is not necessary. This application therefore complies with Policy 37 of the HDPF, and Chapter 14 of the NPPF.

Drainage

- 5.77 The proposed drainage strategy has been designed to broadly accord with the Site Wide Surface Water Drainage Strategy approved pursuant to the discharge of Condition 17 of the OPP (LPA reference DISC/19/0214) and updated in-line with WSCC's local drainage standards.
- 5.78 The Site comprises two catchments, Catchment 6 and 7. Catchment 6, serving the Li-Lo junction, the westernmost section of the Primary Road and the adjoining Health Centre and commercial leisure development parcels, is complete and a verification report approved under LPA reference DISC/25/0091. The Flood Risk Assessment demonstrates that Catchment 6 retains sufficient capacity for the catchment it would serve and accounts for the latest proposals for the Primary Road.

- 5.79 Catchment 7 serves the remainder of the road infrastructure within the Site, the Primary Road and future development parcels. Details for the type and location of drainage features within this catchment are expected to come forward in future Reserved Matters applications. Indicative storage and flow volumes have nonetheless been provided which demonstrate how adequate run-off rates could be achieved.
- 5.80 The proposed strategy strives to utilise sustainable drainage techniques in accordance with the guidance described in CIRIA document C753 'The SuDS Manual' (2015) to accommodate run-off from all rainfall events up to and including the 1 in 100-year event, with a 45% allowance for climate change. Whilst storage is illustrated in sub-surface crates for the purpose of this Outline Application, it is expected that these features will be supplemented by additional SuDS features in future RM applications.
- 5.81 Maintenance plans of drainage infrastructure will be developed for individual RM applications, and their respective SuDS features and would be implemented by a management company upon completion of the drainage works.
- 5.82 The adoption of SuDS features into the development would aid the removal of pollutants from run-off prior to discharge into the ground or watercourses. The SuDS Manual indicates the minimum treatment indices for contributing pollution hazards for different land use classifications. Given this application proposes a range of uses in outline, specific SuDS features which provide adequate treatment will be determined in future Reserved Matters applications.
- 5.83 The drainage strategy for the Development would discharge surface water run-off at pre-development greenfield rate into existing watercourses with SuDS. Whilst further details would be provided within later applications for specific development parcels, it has been demonstrated that compliance with Policy 38 of the HDPF and Paragraph 182 of the NPPF can be achieved.
- 5.84 Design measures, such as the raising of floor levels above climate change flood events, demonstrates compliance with Policy 37 of the HDPF by minimising vulnerability to flooding.

Biodiversity Net Gain

- 5.85 As the timeframe for the submission of Reserved Matters pursuant to the OPP has passed in relation to this Site, the Proposed Development is subject to the statutory 10% biodiversity net gain requirement.
- 5.86 The application is therefore accompanied by a **Statutory Biodiversity Net Gain Metric** and **Biodiversity Net Gain Report**.
- 5.87 L&G will operate as master developer, providing the infrastructure within the Site, with the commercial units within the Proposed Development being brought forward by third parties. As such, the eventual makeup of those parcels cannot be assumed at this time and cannot therefore be included in the BNG metric as delivering an uplift. Only the areas that will remain under the long-term management of L&G or a management company can be determined to deliver an uplift. Whilst maximum gains have been sought to be delivered on-site, the Proposed Development is unable to deliver the necessary 10% biodiversity net gain on-site given the above constraints.

- 5.88 In accordance with the Biodiversity Net Gain Hierarchy contained within the PPG and the Town and Country Planning (Development Management Procedure) Order 2015, other enhancements within the OPP area (or otherwise locally) will be sought, and any resulting necessary uplift captured through the purchase of off-site BNG credits. This is a matter for consideration under the future submission of a Biodiversity Net Gain Plan.

Heritage

- 5.89 Development proposals are expected to sustain and enhance cultural and heritage assets through positive management, including their settings and views, as outlined in Policy 34 of the HDPF.
- 5.90 Chapter 16 of the NPPF contains national policies relating to the conservation and enhancement of the historic environment. Paragraph 207 highlights the need for applicants to describe the significance of any heritage assets potentially affected. Any assessment should be proportionate to an asset's significance, and no more than is sufficient to understand the potential impact of a development on the heritage asset's significance. Paragraph 212 affords 'great weight' to the conservation of heritage assets, irrespective of the level of harm a development proposal may cause to an assets' significance.
- 5.91 A **Heritage Statement** has been submitted within this application which satisfies the requirements of Paragraph 207 and allows the LPA to make an informed assessment against HDC Policy 34 and Chapter 16 of the NPPF.
- 5.92 The Statement highlights three listed buildings which have the potential to be affected by the proposed development, these being Newhouse Farmhouse (circa 120m to the southeast), Kings Farmhouse (circa 410m to the east), and Brook House and Barn (circa 460m to the east). No other heritage assets (designated or otherwise) are affected by the proposal.

Newhouse Farm

- 5.93 Newhouse Farm is a Grade II listed c.17th century timber framed building consisting of red brick facing at ground, and tile hanging at first floor levels. The building is now in use as a farm shop. The property has undergone several alterations, which diminishes its significance to a degree, though the agricultural heritage of the asset remains legible. The agricultural land to the building's east and south is considered to contribute its significance, as is Old Crawley Road which reflects the historic patterns of movement and access through the landscape. Its scale and alignment are consistent with a traditional rural lane.
- 5.94 Nonetheless, the A264 and railway line separating Newhouse Farm and the Site are modern, and act as a clear physical and visual border severing any potential contribution of land to the north to the asset's significance. The Station landscape buffer is proposed along the southern edge of the Development, providing additional opportunities to retain the historic landscape character when viewed from Newhouse Farm. The Development would therefore sustain the significance of this asset.

Kings Farmhouse

- 5.95 Kings Farmhouse is a Grade II Listed c. 17th century building comprising painted brick at ground floor level, and horizontal weatherboarding above.

- 5.96 The landscape surrounding the building is not reflective of its historic character following alterations to field boundaries, the removal of Brook Lane and the introduction of the railway line. The landscape in this locality reflects a more contemporary character.
- 5.97 The significance of the building is derived from its historic and architectural interest in its surviving historic fabric. Kings Farmhouse's setting is contained within its immediate grounds, and its island position between Channells Brook and Wimland Road.
- 5.98 The Site does not have any known historic or functional associations to the Listed Building, nor is there any visual or physical connections between them. It is noted that the Site forms part of the wider landscape adjacent to Wimland Road, however it does not contribute to the understanding of the Farmhouse's significance. The Development would therefore sustain the significance of this asset.

Brook House and Barn

- 5.99 Brook House is a former medieval open hall which has been subject to alterations and additions to its rear between the 16th and 20th centuries. The Barn dates from between the 16th and 17th centuries. These buildings are now in use as two separate dwellings.
- 5.100 Whilst their uses are now separate, the significance of the two asset's remains linked and is derived from their historic and architectural interest embodied in their surviving fabric and form, the group value they hold collectively, and their evolution from the medieval period onwards.
- 5.101 As noted in the assessment of Kings Farmhouse, around 50m closer to the Site, alterations to historic field boundaries and the introduction of the railway and A264 has diminished the significance of the surrounding landscape character. Furthermore, the residential conversion of the two buildings and the separation of their curtilages provides the appearance of two distinct units, as opposed to a single farmstead. The setting of the buildings is therefore primarily derived from their spatial relationship, curtilage, and position within a rural landscape to the east of Wimland Road.
- 5.102 The Site does not bear any physical or historic association to these Listed Buildings. The Development would therefore sustain their significance.

Public Rights of Way

- 5.103 The LVIA assesses the potential impact of the Development on PRow receptors which may be affected, both locally (within 260m of the boundary of the Site) and distant (over 475m from the boundary of the Site).
- 5.104 Identified impacts on local PRow receptors from the Development range from major, adverse and permanent, to minor, adverse and permanent. This remains true from Year 1 to Year 15, as no mitigation measures are proposed which would affect the relevant views.
- 5.105 Noted in the Heritage Statement, the presence of the overhead cables / pylons detracts from the rural character, and the experience encompasses the ongoing development of the landscape immediately west of the Site.

5.106 As a result of changes to the field system and effecting the overall experience, it is considered that the historic landscape character within the Site is of low legibility, although the area retains features of its historic landscape origins through its field structure, tree cover, and scattered pattern of rural settlement. The interest of the historic landscape character is no more than local.

5.107 The greatest impact on distant PRow receptors is assessed to be minor, adverse and permanent over the 1- and 15-year periods.

Summary

5.108 The physical parameters of the Development remain the same as previously approved. The Development would not diminish the significance of any heritage assets, designated or otherwise. The Development therefore complies with HDPF Policy 34 and Chapter 16 of the NPPF.

Minerals

5.109 Chapter 17 of the NPPF sets out the national approach to the sustainable use of minerals. Paragraph 222 highlights the importance of maintaining sufficient mineral supply to provide infrastructure, buildings, energy and goods, noting their finite supply and fixed locations.

5.110 Paragraph 223 details how planning policies should safeguard mineral resources by defining Mineral Safeguarding Areas and adopt appropriate policies to ensure known locations of specific mineral resources are not sterilised (c) by non-mineral development. Paragraph 225 then states LPAs should not usually permit other development proposals in Minerals Safeguarding Areas if it might constrain future use for minerals working.

5.111 The Site falls within a Minerals Safeguarding Area for brick clay. Policy M9 of the Joint Minerals Local Plan 2018 (Updated 2021) is therefore relevant. The proposal involves non-minerals development, and is therefore required to demonstrate that either (i) sterilisation will not occur, (ii) it is appropriate or practicable to extract the minerals prior to the development taking place, or that (iii) the need for the development outweighs the safeguarding of the mineral, and it is not practicable or environmentally feasible to extract prior to development.

5.112 As noted in the accompanying **Minerals Safeguarding Assessment**, brick clay and specifically the Weald Clay Formation is the most widespread resource across West Sussex, with much of the northern half of the country safeguarded for this material. The three existing brickworks within the Country are demonstrated to have ample supply.

5.113 The assessment identifies several receptors such as proximity to residential premises, transport infrastructure, and woodlands and streams and provides them appropriate buffers. The extraction of minerals across the majority of the Site would not be feasible or practicable, meaning the extraction of the very small remaining amount of minerals that are not sterilised would not be viable prior to the development taking place.

5.114 There is little need for the minerals within the Site given its commonality and existing stocks and supply lines, so the need for the Development clearly outweighs the need to safeguard the brick clay minerals identified. In addition, much of the Site is sterilised due to its proximity to existing receptors, making extraction prior to development both impractical and unviable. The Development is therefore shown to comply with Policy M9 of the Joint Minerals Local Plan 2018.

5.115 The Development does not constrain any potential future use for minerals working and also complies with Paragraph 225 and Chapter 17 of the NPPF.

Environmental Impact Assessment

5.116 The OPP was considered to be EIA development and was accompanied by an Environmental Statement (2016; the '**OPP ES**') and subsequent Addendum (2017; the '**ES Addendum**'). The Employment Land site and development proposed through this new outline planning application exceed the thresholds in Schedule 2 of the EIA Regulations in isolation. It also continues to form part of the wider Mowbray masterplan, where significant effects were identified through the OPP ES and ES Addendum. As such, an Environmental Statement ('**ES**') has been prepared for the now Proposed Development.

5.117 An informal scoping exercise was undertaken with the Local Plan Authority in November/ December 2025. The Scoping Report considered the net change in the Proposed Development for the Employment Land from that approved pursuant to the OPP changes to baseline, extent to which new technical assessments are required, continued applicability of the mitigation measures in the OPP ES/ ES Addendum and whether the net change would lead to any new or materially different significant effects.

5.118 A number of topics covered in the OPP ES and ES Addendum were scoped out of the new ES on the basis that they are not likely to have different significant effects to those reported in 2016/ 2017. The full justification as to why these topics (and others) were scoped out is set out at Table 2.1 of the ES. Where appropriate, these are covered by stand-alone reports/ information as detailed above (for example, contamination, LVIA, heritage, drainage, transport).

5.119 Topics scoped into the new ES largely arise from differences to daily traffic flows as a result of the inclusion of different employment uses. Whilst peak trips were similar/ lower than assessed through the OPP, and so do not require revisiting of the OPP highways mitigation schemes, an increase in HGV movements throughout the day occurs for the logistics (B8) uses resulting in an overall increase in daily trips. The noise and air quality impacts of this increase in overall trips, including more HGV movements, has therefore been assessed. Air quality giving rise to further assessment of potential impacts on off-site habitats/ ecology. Climate change impacts are also linked to the traffic flow differences. Whilst socio-economics has been included given the different employment densities and job generation for the different Use Classes.

5.120 At a high-level the findings of the ES in respect of the operational stage are as follows:

- **Socio-Economics** (Chapter 6):
 - Increase in jobs in the District by 1.3% (based on warehouse options which provides lowest job density/ generation i.e. worst-case) = moderate beneficial effect
 - Increase in resident employment by 0.9% (acknowledging that not all of the jobs created will be taken by residents of Horsham) = minor beneficial effect
 - Increase in GVA (economic output) in the District by 1% (est. £43m per annum) = major beneficial effect
 - Cumulative effects with other committed schemes = moderate to major beneficial

- **Biodiversity (Chapter 7):**
 - Critical levels of air pollutants in the vicinity of the Warnham LNR not exceeded = negligible effects
 - 1% threshold for air pollutants exceeded at Buchan Hill Ponds SSSI for nitrogen oxides, ammonia and nutrient nitrogen and acid deposition between 10m and 35m from the road; exceedance of the 1% threshold does not automatically mean there is a significant effect but gave rise to the need for a more detailed assessment of the sensitivity and value of the habitat
 - Detailed assessment concluded negligible effects on SSSI owing to:
 - Ponds (SSSI qualifying feature) located 95m from the road, outside of the areas where exceedance above 1% for the named pollutants
 - Habitats close to the road already subject to high background deposition where evidence shows that they can develop effective tolerance to the effects of further deposition
 - Vegetation affected by the exceedences is plantation woodland understood to have been planted when this section of the A264 was constructed in the late 1980s and effects are unlikely to alter plant species composition or richness
 - Critical levels of air pollutants in the vicinity of nearby ancient woodlands exceeded but unlikely to lead to further deterioration in condition given, inter alia, replanted nature of woodlands with high number of non-native coniferous species and high levels of existing disturbance adjacent to the carriageways = negligible effects
 - Cumulative effects built into the air quality modelling so considered above
- **Air Quality (Chapter 8):**
 - Less than 1% increase in nitrogen dioxide, particulate matter and fine particulate matter on residential receptors = negligible effects
 - Impact on ecological receptors considered in ES Chapter 7 (summarised above)
 - Cumulative effects built into the air quality modelling
- **Noise and Vibration (Chapter 9):**
 - Operational HGV traffic unlikely to raise noise levels above the existing background sound level = negligible effects
 - Cumulative noise assessment not undertaken given distance between committed developments and nearest receptors

- **Climate Change** (Chapter 10):
 - Carbon dioxide emissions expected to result from energy required for the Proposed Development, associated traffic movements and repair/ maintenance; representing a worst-case scenario as do not take account of decarbonisation of the national grid and move towards electric vehicles
 - Mitigation options include installation of smart meters, encouragement of sustainable transport modes and local training initiatives to reduce reliance on in-commuting = minor adverse effects (with mitigation)
 - Cumulative projects not assessed separately for climate change

5.121 The ES has assessed areas where significant effects on the environment could have arisen, including interrelationships/ interactions between and cumulative effects (where relevant). In the majority of instances, the assessments have concluded negligible effects and no further mitigation is required. This is with the exception of climate change where a range of mitigation measures can be employed to reduce climate change impacts and will be included in the detailed/ RM designs. For socio-economics, the significant effects remain beneficial.

6 Conclusion

- 6.1 This Planning Statement assesses the proposals in the context of the Development Plan and other material considerations. It takes account of the national planning policies contained within the NPPF and the HDPF, identifying key material considerations to the determination of this application.
- 6.2 The Site falls within the Business Park of the Land North of Horsham (now Mowbray) site allocation of the HDPF, in compliance with the local policy objective of creating employment opportunities to complement the associated housing development. Whilst the outline planning permission for this element of the OPP has expired for this part of Mowbray, the principle of the Proposed Development remains supported by the development plan and aligns with the OPP masterplan. Furthermore, the introduction of flexibility in the end uses provides greater ability to respond to the needs of the market, strengthening and improving the economic and employment benefits that the Site could provide and facilitating delivery of complementary healthcare and sports/ recreation facilities.
- 6.3 The Proposed Development provides a range of key planning benefits including:
- Diversification of employment uses that reflect the needs of the local economy (in line with HDPF Policy SD1) and now include industrial/ logistics uses alongside offices
 - Flexible uses that will allow the Site/ permission to be responsive to needs at the detailed design stage
 - Increase in local jobs and economic output for the District
 - Parameters that are sufficiently flexible to allow for different scales of employment development to meet a wide range of needs which could include start-up units, enterprise developments, large-format developments and all scales in between
 - Express inclusion of healthcare uses in an appropriately located and accessible parcel on the future bus route
 - Suitable sized parcel to provide for a viable, high-quality commercial leisure facility with clarity on uses (to include indoor and outdoor sports/ recreation and swimming pools)
 - Reduced vehicle trips at peak hours for the industrial/ logistics uses
 - Retention of existing vegetation, save for where required for access
 - 10% BNG through on-site improvements, enhancements elsewhere in Mowbray and off-site credits
- 6.4 This Planning Statement demonstrates that the development proposals would be sustainable development that would accord with the Development Plan as well as the NPPF and PPG. Moreover, they are compatible with the wider Mowbray masterplan, offering a number of enhancements over the original scheme. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that the determination of planning applications should be in accordance with the

Development Plan unless material consideration indicate otherwise. The development proposals accord with the Development Plan and in accordance with Paragraph 11 of the NPPF, this planning application should be approved without delay.