

---

## **HEARING STATEMENT ON BEHALF OF LEGAL & GENERAL (STRATEGIC LAND NORTH HORSHAM) LTD**

### **Reg 19 Response No. 1192075**

#### **Response to Inspector's Matter 5: The Spatial Strategy and site selection**

##### **Matter 5a: Session for site promoters / developers / agents**

- i. **Spatial distribution: whether the plan's proposed distribution of development is an appropriate spatial response to:**
    - **housing need in the District and in adjacent districts**
    - **the settlement hierarchy and settlement character**
    - **access to employment, social and community facilities and the objective of reducing the need to travel**
    - **the highway network**
    - **the rail network**
    - **public transport and active travel**
  - ii. **Constraints: whether the distribution of development is sound having regard to:**
    - **landscape and countryside**
    - **heritage assets and their settings**
    - **habitats and biodiversity**
    - **flood risk and climate change mitigation**
    - **services including water and sewerage**
  - iii. **Housing delivery: whether the range of sizes and types of site would ensure that:**
    - **different housing needs and aspirations would be adequately met**
    - **enough homes would come forward at the right time during the plan period to meet the housing requirement**
- 1.1 This hearing statement is prepared on behalf of Legal & General (Strategic Land North Horsham) Ltd ('L&G') having specific regard to its committed and delivering strategic site: Land North of Horsham (now known as Mowbray). L&G's full comments and requests for amendments are set out in our Regulation 18 and 19 representations (2020 and 2024), previous written statements (from 2024/ 2025) and Main Modifications representations (2026) which should be read alongside. This statement serves as a high-level summary to assist discussions at the Spatial Strategy and Site Selection hearing session on 13 October 2026.
- 1.2 It is L&G's position that the general principles of the spatial strategy are well-conceived but that refinements are required in the interests of soundness and to optimise the potential of strategic sites, such as Mowbray, to ensure a sufficient and steady supply of new homes that are well connected and supported by infrastructure of the right type and at the right time to ensure sustainable development.

- 1.3 Mowbray is a committed development where nearly 300 homes of the 2,750 homes approved are occupied, a further 500 are approved with extant applications for many more. It represents a logical and deliverable location for growth in addition to the 2,750 homes already approved (LPA reference DC/16/1677; 'the OPP'), supporting the District's settlement hierarchy and the role of Horsham as the principal town. It makes efficient use of completed strategic infrastructure and is capable of addressing relevant environmental, service and infrastructure constraints.
- 1.4 As drafted (in the Submission Version Local Plan 2024 and amended through the Main Modifications: MM147), it is unclear whether the Local Plan (draft Policy 37) allocates an additional 500 homes at Mowbray on top of the Horsham District Planning Framework (2015; 'HDPF') allocation of 2,500 homes or the extant outline planning permission 2,750 homes. L&G has consistently demonstrated through representations (see Reg 19 reps from 2024 and subsequent Main Mods reps September 2026) that Mowbray can comfortably accommodate an additional 500 homes within the allocation boundary on top of the approved 2,750 (to a total of c. 3,250 homes) whilst working within the OPP approved land use, density and height parameters.
- 1.5 There are also three parcels of land outside of the OPP and HDPF allocation red line ('the Additional Land'). These provide modest but logical extensions to the three residential phases established through the OPP and provide c. 380 extra homes. With the uplift within the current allocation boundary and the three parcels outside, Mowbray could provide c. 890 homes in addition to the approved 2,750 to take the total deliverable within the Plan period to 3,640 homes. However, the draft Local Plan does not make clear how many additional homes it intends Mowbray to deliver. Whether 500 in addition to the current allocation or on top of the approved 2,750, the number falls notably short of the site's optimised capacity.
- 1.6 In summary, the Plan should recognise the full remaining OPP supply at Mowbray, the proposed uplift within the existing OPP/allocation boundary and the Additional Land as a low-risk/ high confidence and sustainable means of improving housing supply. If the Council is not prepared to allocate the Additional Land now, it should at least identify it as reserve land capable of release if other allocations fail to deliver as expected.

**i. Spatial Distribution**

- 1.7 The proposed distribution could do more to support the role of Horsham as the District's main town, particularly the opportunity to optimise committed strategic development at Mowbray. Mowbray is not a speculative new settlement requiring a long lead-in period. It is an allocated and implemented strategic urban extension with outline planning permission for 2,750 homes, schools, employment, retail, community, sport and leisure facilities, public open space and strategic transport infrastructure, much of which has been completed or has reserved matters approval with delivery planned in the short-term. That means further growth at Mowbray would directly support the settlement hierarchy, maintain the character of growth around the District's most sustainable settlement, and place new homes close to employment, education, community facilities and sustainable transport opportunities (existing and planned).
- 1.8 Whilst providing new homes to support growth and evolution of Horsham town, Mowbray is located in the north of the District directly connected to Crawley and Gatwick Airport, recognised as major sources of local employment but unable to meet their own needs for housing. Mowbray positively contributes to meeting housing needs in Horsham and those unmet in Crawley and is geographically preferable to many of the newly proposed strategic sites in this regard. Land West of Ifield is needed to assist with Crawley's unmet need but places all of those homes into a single

strategic allocation. Mowbray can assist further in meeting unmet needs from Crawley, providing an alternative source of supply to West of Ifield that is already delivering new homes and facilities to bolster supply.

- 1.9 Additional homes at Mowbray would make efficient use of complete/ committed infrastructure, support the viability and vitality of the planned local centre, supermarket, employment park and sport/ community facilities, and increase patronage of public transport services (with the bus route extension into Mowbray already operational). The Site benefits from extensive new and planned walking and cycling infrastructure, including connections across the A264, links to existing public rights of way and integration with the wider Horsham cycle network (including links between Crawley and Horsham).
- 1.10 The transport evidence confirms that the additional 500 homes within the existing allocation boundary can be accommodated without requiring further strategic highway mitigation. The preliminary transport assessment tested both trip internalisation and mode shift scenarios and found insignificant differences in traffic flows when compared with the outline planning Transport Assessment. The committed highway mitigation package is therefore sufficient to accommodate the uplift showing that Mowbray is suitable and deliverable in this regard.

## **ii. Constraints**

- 1.11 Significant work on positively responding to and/ or mitigating impacts on constraints was done at the HDPF and OPP stage. Further work has shown that additional homes at Mowbray (through increases within and outside of the allocation boundary) can be readily accommodated. The social infrastructure assessment (submitted as part of L&G's Reg 18 reps in 2020) demonstrates that needs arising from an additional 500 homes within the allocation boundary can be accommodated by the education, healthcare, open space, play, sport and community infrastructure already secured through the OPP. In particular, the two 2FE primary schools provide 840 places against an assessed need of 813 places for 3,250 homes, and the 8FE secondary school provides 1,200 places against an assessed need of 585 places. The healthcare requirement for 3,250 homes is assessed at 4.3 FTE GPs, broadly aligned with the healthcare facility secured through the S106 for no fewer than four doctors. The evidence therefore shows that the relevant services and social infrastructure constraints have been properly assessed and are capable of being addressed through the committed Mowbray infrastructure package.
- 1.12 The Additional Land comprises three refined parcels to the north of Mowbray, with a combined developable area of 12.83 hectares and capacity for around 380 homes. The 2024 landscape and visual appraisal concludes that all three parcels have moderate capacity for medium-scale residential development (similar to parcels within the extant OPP), are well contained by woodland, trees and hedgerows, and would not alter the conclusions of the original LVIA for North Horsham. Development would remain below the wooded ridgeline, retain boundary vegetation, incorporate buffers to ancient woodland and ecological features, and provide opportunities for biodiversity enhancement and open space.
- 1.13 The Council's concerns about landscape impact and deliverability should therefore be revisited. Those concerns were based on wider parcels and did not reflect the parcels being promoted including refined developable areas and finer-grain landscape assessment (see updated site assessments included with L&G's Reg 19 representations, 2024). The Additional Land as promoted is directly related to the existing OPP phases, would be accessed internally from Mowbray rather than from rural lanes, and would come forward alongside or following the

adjacent residential phases. This provides far greater delivery certainty than reliance on new allocations which have not yet commenced.

### iii. Housing Delivery

- 1.14 The Plan's housing trajectory should be amended to reflect the realistic contribution from Mowbray and the role it can play in ensuring that enough homes come forward at the right time during the Plan period. The Council's January 2024 trajectory assumed only 2,057 homes from Mowbray in the Plan period. This has been modified in the Updated Trajectory (February 2026; Appendix 1 of the Matter 1 Housing Requirement Topic Paper) but remains incorrect. Only 1,435 of the 2,750 homes approved through the extant OPP are provided for during the Plan period to 2040 (see page 4, Category B Strategic Sites). As per previous submissions, this does not reflect the terms of the OPP, specifically the time limit conditions. The Trajectory also only provides for 60 homes as an additional allocation to Mowbray rather than the 500 homes as clarified through the Mains Mods. The August 2026 Housing Trajectory and Five-Year Housing Land Supply Update provides a summary trajectory which does not show how individual sites contribute. It is therefore not possible to comment at this time as to whether this has been updated to accurately reflect the trajectory of housing delivery from Mowbray. This should be as per the L&G Housing Delivery Trajectory (June 2026) as appended to our Main Mods representations.
- 1.15 L&G's trajectory confirms that Mowbray can contribute around 3,645 homes to 2040, including the OPP, the uplift, Cuckmere Farm and the Additional Land. This would provide around 890 homes more than the OPP figure alone and would materially improve the robustness of the Plan's housing supply with high confidence in delivery within the timeframes stated.
- 1.16 Whilst L&G commends the work officers have undertaken in preparing and significantly amending the draft Local Plan, it cannot be found sound until the housing trajectory and spatial strategy are modified to recognise Mowbray's full contribution. Doing so would align the spatial distribution of growth with Horsham's settlement role, accessibility and sustainable transport opportunities; it would recognise that the relevant landscape, infrastructure and service constraints are capable of being managed; and it would improve housing delivery by relying on an implemented strategic allocation that is already bringing forward homes and infrastructure. The Plan should therefore provide for at least the remaining OPP homes, the uplift within the OPP, Cuckmere Farm and the Additional Land. No clear reasons have been provided by the Local Planning Authority as to why the full ability of Mowbray to deliver additional homes through this Local Plan is not being capitalised upon.

### Amendments to draft Policy 37

- 1.17 The following amendments are the minimum required to draft Policy 37 in the interests of soundness, in addition to those proposed by the Council through its main modifications (L&G amendments shown **red**):
4. **At least an additional 500 60 dwellings from intensification of the Land North of Horsham allocation (Horsham District Planning Framework, November 2015; now known as Mowbray). This intensification brings the totals 500 dwellings at Mowbray to 3,250 homes (and includes Cuckmere Farm), and**
- 1.18 Corresponding amendments will be required to supporting paragraphs. L&G would be pleased to discuss at the hearing session additional amendments to draft Policy 37 to further capture the potential of Mowbray to improve housing supply and the soundness of the Local Plan.