

Technical note in respect of Land at Broomers Hill Business Park, Pulborough

April 2026

INTRODUCTION

1. This technical note provides an update of the planning status of land at Broomers Hill Business Park, Pulborough, part of which is proposed for allocation at Strategic Policy 29 of the emerging Local Plan (Site EM3).
2. Since the emerging Plan was submitted for Examination, there have been a number of changes in circumstance that relate to Land at Broomers Hill Business Park, which have implications for the emerging Local Plan, particularly Table 5, and therefore the residual need for employment land over the plan period. These changes in circumstance are:
 - confirmation of the planning status of the second phase of Broomers Hill Business Park; and
 - the making of the Pulborough Neighbourhood Plan.
3. These changes in circumstance are considered to be relevant for the forthcoming Matter 4 Hearing Session. However, given their factual nature, they are not considered to be of a sufficient scale to necessitate attendance at the Hearing Session.
4. For the avoidance of doubt, this technical note has had regard to the Employment Topic Paper published by the Local Planning Authority in March 2026 (ref: HDCJB09).

LAND AT BROOMERS HILL BUSINESS PARK

5. The wider site, which is owned on a freehold basis by WT Lamb Properties Limited, is divided into three phases, which are identified on a plan provided at Appendix 1. Summarily, the phases are as follows:
 - **Phase 1** – the first phase of the Business Park was granted planning permission in 1996 (ref: PL/2/96) and comprises 3,485sq.m of B1/B8 uses. It has been built out and is fully occupied. The site is some 1.34ha in size. It is located to the east of Stane Street and to the south west of Broomers Hill Lane, from which access is achieved.
 - **Phase 2** – the second phase of the Business Park is located to the east of the first phase and to the west of the Arun Valley Railway Line. It benefits from detailed planning permission (ref: hybrid planning permission DC/13/1048 and reserved matters permission DC/16/2006). The approved schemes cumulatively provide 1,650sq.m of employment floorspace on 0.67ha of land. As confirmed by Certificate of Lawful Use or Development (Existing) DC/25/1318 (hereafter CLUED), the permissions were lawfully implemented and are therefore extant. However, no works beyond the initial digging of part of the approved access road have been undertaken. In response to a requirement for new employment premises from a specific occupier, WT Lamb Properties Limited will, following positive pre-application feedback from the Local Planning Authority, be

making a Section 73 application to amend the approved and implemented development in the near future.

- **Phase 3** – the third phase of the development is located to the south of the first and second phases, to the west of the Arun Valley Railway, to the east of Stane Street and to the north of Cray Lane. It measures approximately 2.74ha in size. This part of the site is allocated at Policy 7 of the Pulborough Neighbourhood Plan for commercial uses and is proposed for allocation at Strategic Policy 29 of the emerging Local Plan (Site EM3). WT Lamb Properties Limited are in the process of forming their development proposals for Phase 3.

CHANGES IN CIRCUMSTANCE RELATING TO BROOMERS HILL BUSINESS PARK

6. As set out above, there has, since the submission of the emerging Local Plan, been a number of changes of circumstance that relate to the planning status of the second and third phases of the Broomers Hill Business Park. These are:

- confirmation that planning permission DC/13/048 and reserved matters approval DC/16/2006 have been lawfully implemented; and
- the Pulborough Neighbourhood Plan, which was made on the 8th October 2025.

7. An explanation of each change of circumstance is provided below.

Planning permission DC/13/1048 and DC/16/2006

8. As set out within their Matter 7 Hearing Statement, WT Lamb Properties Limited were concerned that Table 5 of the emerging Local Plan did not include their extant planning permission at Phase 2 of the Broomers Hill Business Park (ref: DC/13/1048 and reserved matters approval DC/16/2006). Evidence was provided at Appendix 1 of the Hearing Statement that the permissions had been implemented and were extant.
9. As noted above, in the intervening period, WT Lamb Properties Limited submitted an application for a CLUED pursuant to Section 191(1)(c) of the Town and Country Planning Act 1990 (as amended), in order to confirm the lawfulness of the material operations previously undertaken on the site to commence the employment development permitted by hybrid planning permission DC13/1048 and reserved matters approval DC/16/2006 on the second phase of the Business Park. The application (ref: DC/25/1318) was approved by the Local Planning Authority on 14th August 2025. Consequently, the Local Planning Authority acknowledge that the permissions have been lawfully implemented and are extant.
10. The CLUED is provided at Appendix 2.

Pulborough Neighbourhood Plan

11. As indicated above, the third phase of the Broomers Hill Business Park is proposed for allocation at Strategic Policy 29 of the emerging Local Plan (Site EM3). There was recognition within the analysis for the site contained within the Site Assessment Report – Employment Assessment Outcomes (Document H11, Part E), that the site was “*identified in the post examination Pulborough Parish Neighbourhood Plan as an employment allocation for business expansion*” but that at that time the Neighbourhood Plan Referendum was “*held in abeyance due to Water Neutrality and impact on the Habitats Regulations Assessment (HRA)*”.
12. However, since the publication of the Site Assessment Report and the Submission of the emerging Local Plan, the Pulborough Neighbourhood Plan has been made (8th October 2025). It consequently now forms part of the Development Plan, in so far as it relates to the Neighbourhood Plan Area.

¹ Pages 484 and 485.

13. Importantly, the Neighbourhood Plan allocates the third phase of the Business Park at Policy 7 for “commercial uses.” The final policy wording is provided at Appendix 3, whilst the Policies Map is provided at Appendix 4.
14. Importantly, the policy confirms that:
- support is given for the development of class B2, B8 and E uses; and
 - access should be achieved from the A29 or Broomers Hill Lane.
15. The Policies Map confirms that all three phases of the Broomers Hill Business Park are located within the Pulborough built-up area boundary, as defined by the made Neighbourhood Plan.

IMPLICATIONS OF THE CHANGES OF CIRCUMSTANCE FOR THE EMERGING LOCAL PLAN

16. The changes of circumstance listed above have implications for the emerging Local Plan. These are detailed below.

Employment land commitments

Phase 2

17. The recently approved CLUED confirms that the second phase of the Broomers Hill Business Park was lawfully implemented. Consequently, there is a need for this commitment to be listed in an amended Table 5 of the emerging Local Plan. This would provide an additional 1,650sq.m of committed employment floorspace.
18. Moreover, despite the CLUED being granted in August 2025, which confirms the extant nature of the Phase 2 development, it is not listed as being a commitment within the Employment Topic Paper (ref: HDCJB09), which was published in March 2026.
19. Consequently, in order to recognise planning permission DC/13/1048 and reserved matters approval DC/16/2006 as commitments, there is a need for Topic Paper HDCJB09 to be amended. This will include reference being made to planning permission DC/13/1048 and reserved matters approval DC/16/2006 being listed either in full, or as a component sum in Tables 2, 3, 4 and A2 of the evidence base work. Importantly, it would reduce the ‘outstanding need’ identified in Table 4 to between 0sq.m and 4,604sq.m.

Phase 3

20. In addition, as set out above, the third phase of Broomers Hill Business Park is allocated at Policy 7 of the made Pulborough Neighbourhood Plan. It should also, therefore, be identified as an existing commitment within Table 5 of the emerging Local Plan. As the site is already allocated in a development plan document, consideration should be given to removing it as an allocation from the emerging Local Plan at Strategic Policy 29. The detailed policy context provided by Policy 7 of the Pulborough Neighbourhood Plan will ensure that an acceptable form of development would come forward at the site.

Settlement boundary

21. Within WT Lamb Properties Limited Matter 7 Hearing Statement they raised concerns that the emerging Local Plan did not propose to include any of the three phases of Broomers Hill Business Park within the defined settlement boundary. At that time, WT Lamb Properties Limited suggested that the approach conflicted with the then emerging Pulborough Neighbourhood Plan, which, following the Neighbourhood Plan Examiner’s recommendation, proposed to include all three phases within the revised built-up area boundary for Pulborough.
22. As can be seen from the plan provided at Appendix 4, the final version of the Pulborough Neighbourhood Plan includes all three phases of the Broomers Hill Business Park within the built-up

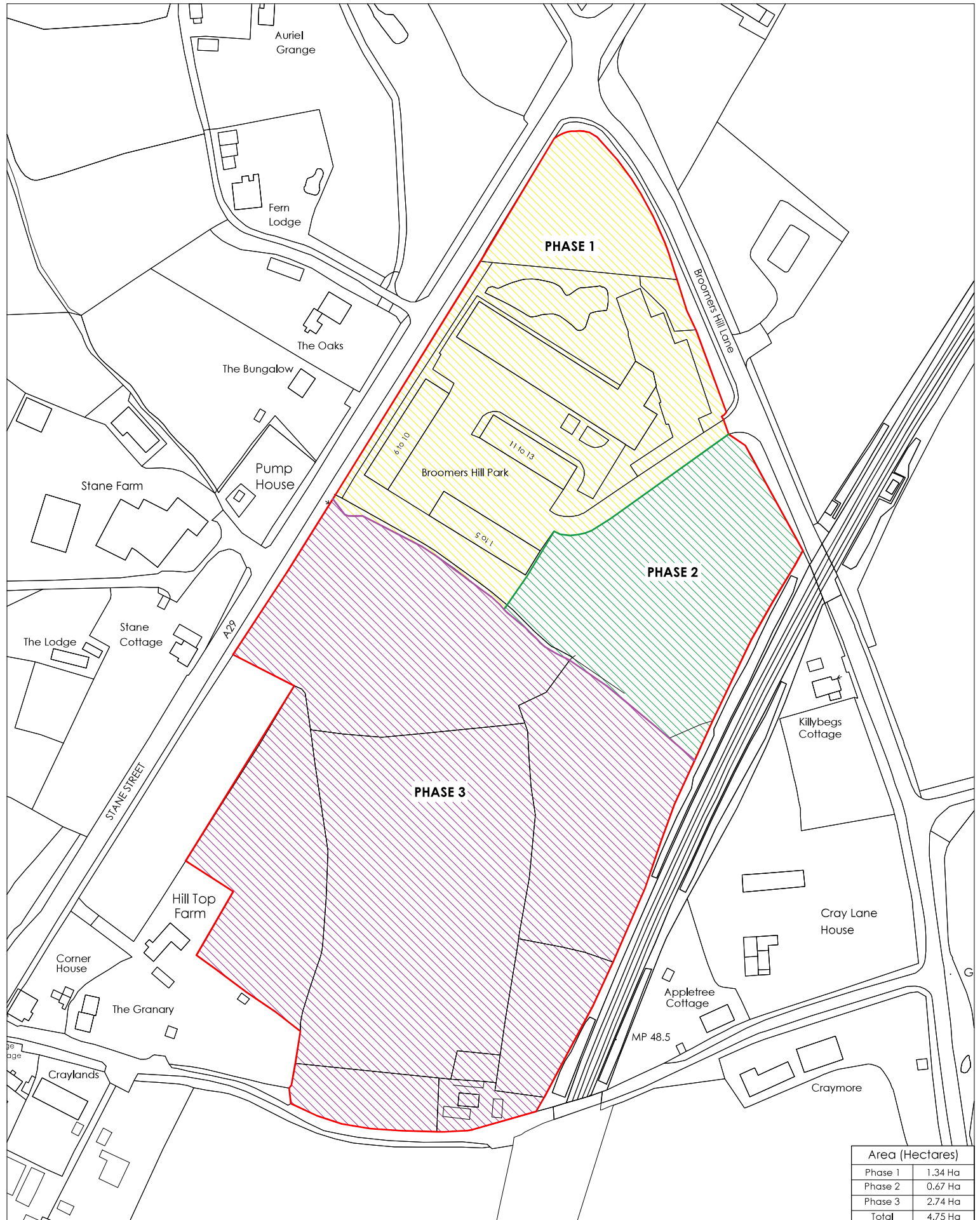
area boundary. Given this key change in circumstance, the Policies Map of the emerging Local Plan should be re-drawn to follow the revised built-up area boundary for Pulborough.

WT LAMB PROPERTIES LIMITED PARTICIPATION IN THE LOCAL PLAN HEARING SESSIONS

23. From reviewing Examination Documents IDJB00 and IDJB04, WT Lamb Properties Limited understand that Strategic Policy 29 will be subject of a Hearing Session in the future. It remains their intention, at this stage, to attend that Hearing Session.

LRM Planning
April 2026

Appendix 1. Site location and phasing plan



Area (Hectares)	
Phase 1	1.34 Ha
Phase 2	0.67 Ha
Phase 3	2.74 Ha
Total	4.75 Ha

Prepared By:
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Rev.	Date	Description
A	10.04.26	Red line boundary amended. Phases added.
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Drawn by:
PH



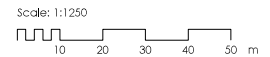
Project:
Codmore Hill Industrial Estate PH 2
Drawing:
Location Plan

Project No:
1749
Dwg No:
2000
Rev:
A

Drawing Status:
PLANNING
Date:
22.09.25
Drawn by:
TK
Checked by:
CB

Contractors must work only to figured dimensions which are to be checked on site.
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Application Site Boundary



Appendix 2. Certificate of Lawful Use or Development (existing) DC/25/1318



Mr Michael Rees
LRM Planning Ltd.
22 Cathedral Road
Cardiff
CF119LJ

**TOWN AND COUNTRY PLANNING ACT 1990: S191 (AS AMENDED BY S10 OF THE
PLANNING AND COMPENSATION ACT 1991)**

**TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE)
(ENGLAND) ORDER 2015**

CERTIFICATE OF LAWFUL USE OR DEVELOPMENT (EXISTING)

Application No: DC/25/1318

Horsham District Council hereby certifies that on the 14th August 2025 the use/operations/matter described in the First Schedule to this certificate in respect of the land specified in the Second Schedule to this certificate and edged in red on the plan attached to this certificate, was lawful within the meaning of section 191 of the Town and Country Planning Act 1990 as amended (“the Act”) for the following reasons:

FIRST SCHEDULE

Application to confirm the existing development relating to the commencement of works granted by planning permission ref. DC/13/1048 and reserved matters approval ref. DC/16/2006 (Lawful Development Certificate - Existing).

SECOND SCHEDULE

Broomers Hill Park, Broomers Hill Lane, Codmore Hill, West Sussex

Schedule of plans/documents

This decision is based on the following schedule of plans/documents:

Plan Type	Description	Drawing Number	Received Date
Supporting Statement	Emails with LPA		14.08.2025
Supporting Statement	Emails with LPA		14.08.2025
Supporting Statement	DISC/16/0198	NONE	14.08.2025
Photos		NONE	14.08.2025
Location plan		1000	14.08.2025
Supporting Statement	Planning stage method statement, construction management plan	NONE	14.08.2025

Additional notes

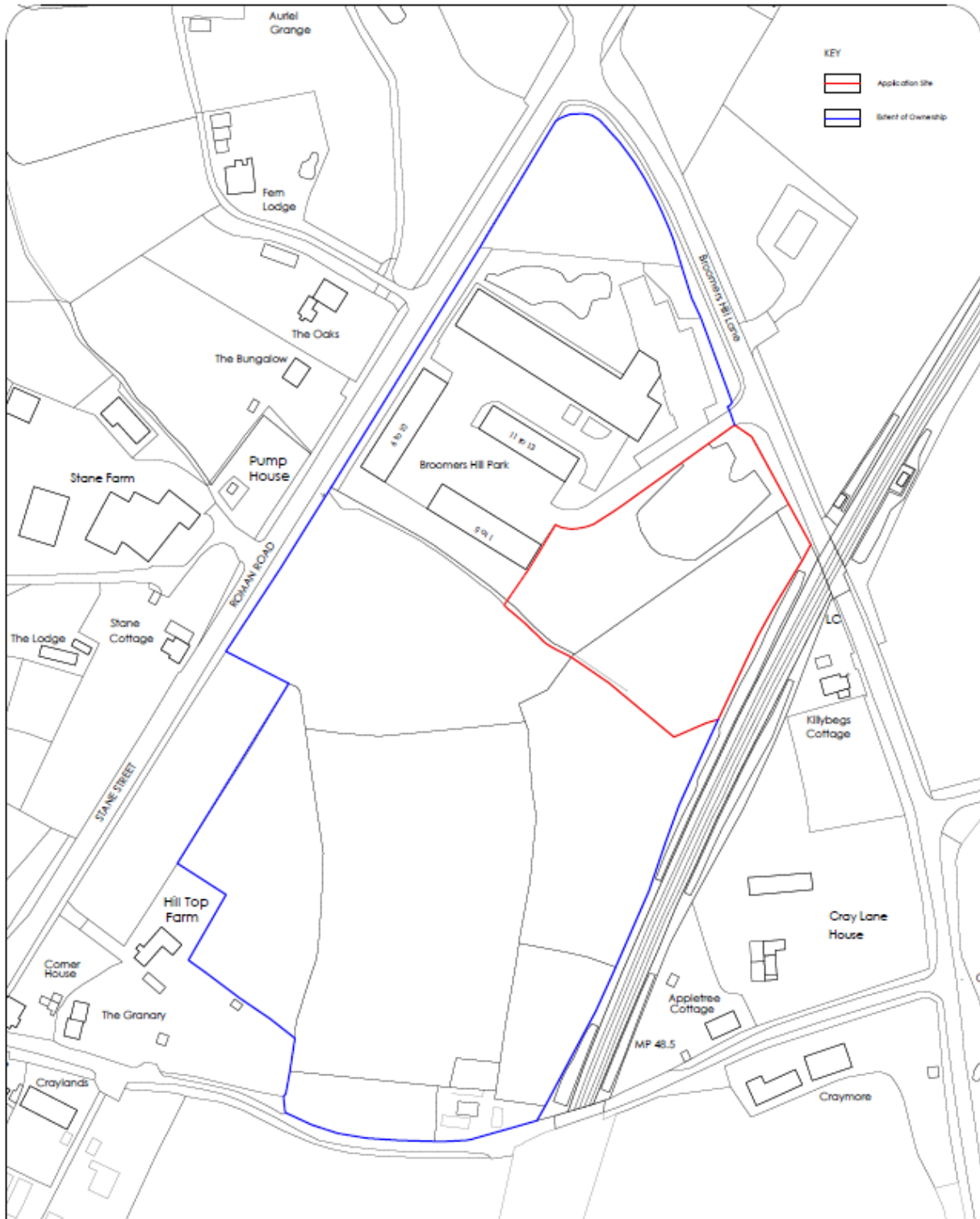
1. This certificate is issued solely for the purpose of s191 of the Act (as amended).
2. It certifies that the use/operations/matter specified in the First Schedule taking place on the land described in the Second Schedule was lawful, on the specified date and thus was not liable to enforcement action under Part 7 of the Act on that date.
3. This certificate applies only to the extent of the use/operations/matter described in the First Schedule and to the land described in the Second Schedule and identified on the attached plan. Any use/operations/matter which is materially different from that described or which relates to other land may render the owner or occupier liable to enforcement action.
4. The effect of the certificate is also qualified by s 192(4) of the Act which states that the lawfulness of a described use or operation is only conclusively presumed where there has been no material change, before the use is instituted or the operation begun, in any of the matters relevant to the determining of such lawfulness.



Emma Parkes
Head of Development and Building Control

Date: 19/12/2025

Plan



KEY

	Application Site
	Extent of Ownership

Prepared by



0120707100
www.placebydesign.co.uk

Client



Rev.	Date	Description	Drawn by
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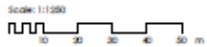

Project No: 1749
 Drawing Title: PLUMBING
 Day No: 1000
 Date: 08/06/17
 Rev: 1:1250843
 Drawn by: CB
 Checked by: SH

Project: Codmore Hill Industrial Estate PH 2
 Drawing: Location Plan
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This drawing uses survey information by others. The accuracy of the information has not been verified. Place by Design cannot be held liable for any errors or omissions in the information or any design changes which may be required as a consequence of reliance on such information. Dimensions should be verified on site before making detailed design of any element of the proposals.

Contractors must work only to figured dimensions which are to be checked on site.

Scale: 1:1250

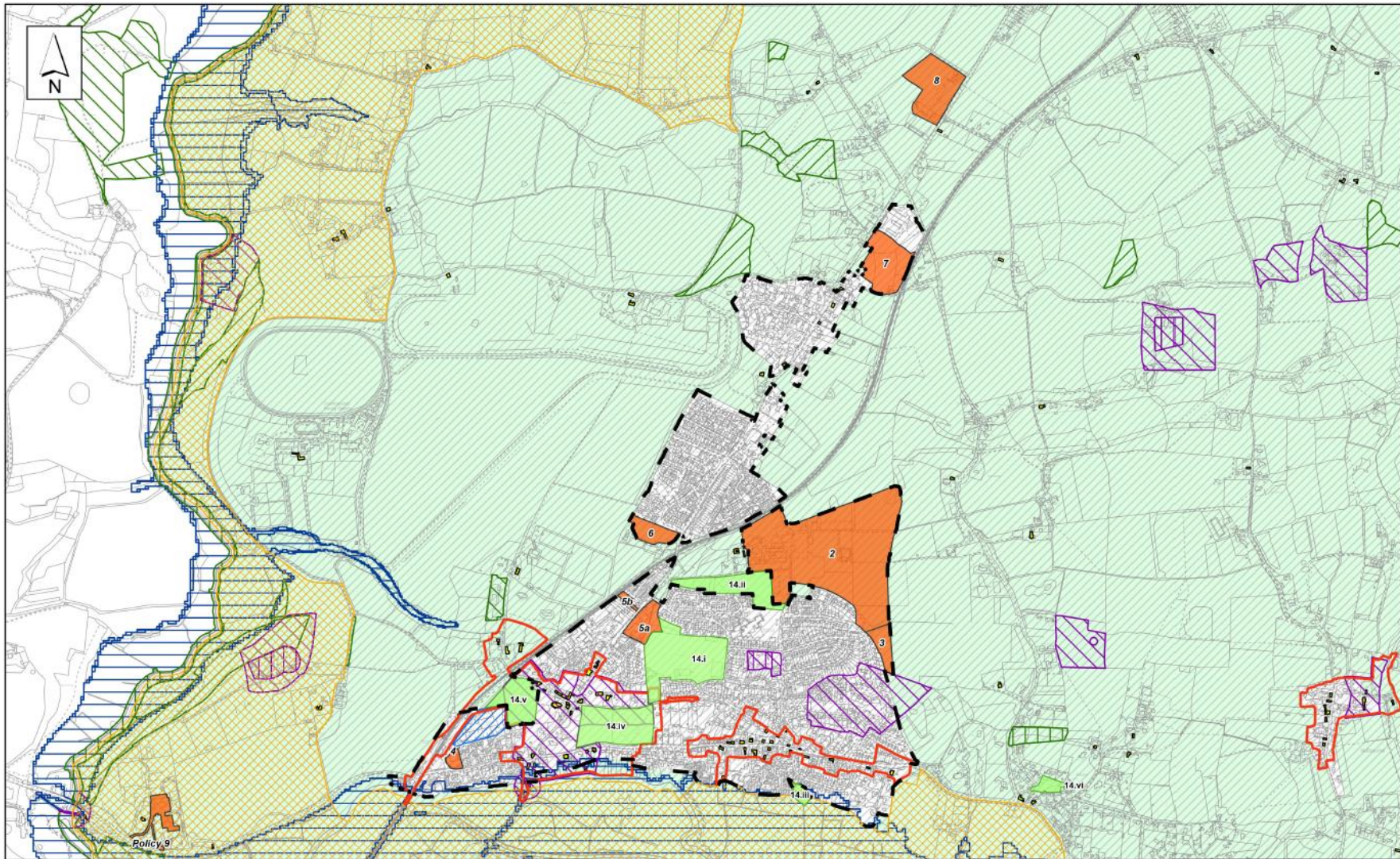
Appendix 3. Policy 7 of the Made Pulborough Neighbourhood Plan

Pulborough Neighbourhood Plan allocates Land South of Broomers Hill Industrial Estate as shown on the Policies Map (3 Ha) for commercial uses only. Support is given to any proposal subject to the following criteria being met:

- i. Support is given to the development of commercial uses (class B2, B8 and E) at Land South of Broomers Hill. Particular support is given to providing premises for start-up and expanding commercial uses;
- ii. Safe access is achieved off either the A29 or Broomers Hill Lane;
- iii. Safe access through the southeast corner of the site should be provided for workers/visitors using non-motorised travel;
- iv. Existing field boundaries will be retained and enhanced with native species to ensure an appropriate and effective soft scape/green transition from proposed development to the wider open countryside and help to minimise the visual impact of the proposal;
- v. Any development shall be informed by a full ecological and biodiversity survey and assessment report. Any recommendations arising from the assessment or study in order to make the development acceptable in planning terms must be implemented. A net gain of biodiversity on the site is required;
- vi. Development proposals should ensure there is no net increase in surface water run-off taking into account climate change and there may be opportunities to reduce existing run-off rates through the use of sustainable drainage (e.g. rain gardens and green roofs).
- vii. Development proposals should include the provision of good broadband connectivity as highlighted in Priority 4 of the Horsham District Economic Development Strategy.
- viii. Any development proposal of over 1000 square metres should meet Building Research Establishment Environmental Assessment Method (BREEAM) Very Good standards;
- ix. Any proposal should demonstrate it is appropriate to the local context. Particular regard should be given to design, height, massing and use of materials appropriate to the local context in line with the Pulborough Design Statement;
- x. All external lighting shall be designed and laid out to minimise light pollution;
- xi. Any development should conserve and enhance the setting of existing listed buildings adjacent to the site;
- xii. The Habitats Regulations Assessment April 2020 identifies this site as being close to a specific bat flight path (see their page 61). Schemes proposed for a site shall identify and retain those features on site that are particularly important for bats and any impacts likely to cause disturbance to important routes used by bats for foraging or commuting; and show how and where any external lighting will be installed (through the provision of appropriate lighting contour plans, Isolux drawings and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent bats using their territory;
- xiii. Developers should submit a Construction Environment Management Plan showing how they will avoid damaging local water quality by preventing water runoff from the site (see page 8).
- xiv. All development within the Sussex North Water Resource Zone (WRZ) will need to demonstrate water neutrality through water efficient design and offsetting of any net additional water use of the development. All proposals should look to be compliant with Policy 16: Water Neutrality.

Appendix 4. Made Pulborough Neighbourhood Plan Policies Map

POLICIES MAP



Horsham District Council
 Albery House, Springfield Road,
 Horsham, West Sussex, RH12 2GB

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Proposed_BUA_Amendments	Scheduled Monuments	Flood Risk
Local_Green_Spaces	Ancient Woodland	Listed Building
Allocations	Archaeological Site	The Mens SAC (6500m)
Conservation Area	Local Wildlife Site	LDF2015 Key Employment Areas
National Park	SSSI	Outside BUAB

Policies Map: Pulborough Neighbourhood Plan			
Reference No :	Date : 06/10/2021	Scale : 1:12,500 (at A3)	
Drawing No :	Drawn :	Checked :	Revisions : 08/05/2025