

Wimblehurst Road Residents Association

Wimblehurst Road Residents Association
c/o Chandos House,
14 Wimblehurst Road,
Horsham, RH12 2ED

Planning Department
Horsham District Council,
Albery House,
Springfield Road,
Horsham RH12 2GB

Date: 22 December 2025

Ref: Outline Planning Application DC/25/o629, Former Novartis Site, Parsonage Road, Horsham RH12 5AA Amended Proposals

Proposal: Residential development comprising 206 dwellings and a commercial unit, including the part-demolition of 'Building 3' and demolition of 'Building 36'. Vehicular access taken from Wimblehurst Road. Car and cycle parking, landscaping and open space and associated works. The replacement of the existing cedar trees at the site.

Stance of response for Amended Plans for Outline Planning Application DC/25/o629: Object

This response to the Amended Plans for Outline Planning Application DC/25/o629 is being made by Wimblehurst Road Residents Association (WRRRA) working in conjunction with residents of the Richmond Road Conservation Area together with residents of North Heath Lane and Allcard Close. Gordon Road, Wimblehurst Road and part of Hurst Road form part of the Richmond Road Conservation Area.

Our initial submission to Outline Planning Application DC/25/o629 was submitted to Horsham District Council Planning Department on 19th May 2025 and can be viewed on the Planning Portal.

We continue to object to these initial plans and are submitting a response of Objection to the newly submitted Amended Plans.

Our reasons for comment:

1. Overdevelopment
2. Highway, Access and Parking
3. Drainage and Environmental Considerations
4. Trees and Landscaping
5. Privacy, Light and Noise

6. Loss of General Amenity

Outlined below are our comments regarding our reasons for objection.

Yours sincerely,

Jane Apostolou,

Chair Wimblehurst Road Residents Association.

Introduction

Over the course of the last few months WRRRA has made an objection to the Phase 1 and 2 Planning Application (DC/25/0629) and the Phase 3 Planning Application (DC/25/0415). Our primary basis for the objections was that of over-development. In our opinion the number of residents on the three Phases will not be able to be supported by local medical services, educational establishments at all levels and there would be a significant impact of traffic on the immediate and wider community.

We remain disappointed that the Developers have not taken the opportunity to comment on our concerns and explain how they envisage these services will be able to meet the demands on residents from 2027 onwards. In the case of the traffic impact the view of the parties concerned (based on the Planning Committee meeting for DC/25/0415) is that there are no options for amelioration and residents in the community and the Muse/Lovells development will just have to accept longer delays.

It came as a considerable surprise to find that Application DC/25/0629 had been resubmitted with a significantly revised approach to the opportunities created by the two existing ex-Novartis buildings.

The investigation and discussions are set out in the report from Lovells entitled *Building 3 – Horsham Enterprise Park Phase 1 & 2*. We are surprised to see that this document is not dated, and there is very little chronological information about the progress of the investigations and discussions in the text of the report. We feel it is important for us to be able to understand who knew what and when did they know it.

Lovells would have been aware of the build date of Building 3 (circa 1938/1939) from the outset of the project and yet it seems that no account was taken of the inevitable decay of the building structure until quite recently and seemingly after the initial submission of DC/25/0629.

We note that this response has had to be submitted in just five working days, ahead of an anticipated meeting of the Planning Committee in January 2026.

No justification for this accelerated process has been provided.

The documents submitted by the Applicants justify the demotion of Building 3 (with the exception of the Clock Tower) and in effect undertake a new build shed more light

on the basis for the decision. WRRRA appreciated being invited to a site visit on 17 December. During the course of site visit WRRRA tabled ten oral questions to representatives of Lovells. The responses provided form the basis for the comments below which raise issues where we feel that there is a totally inadequate level of information available.

2. Schedule of works

The information provided on 17 December was that the demolition of Buildings 3 and 36 would commence as quickly as possible once the Application had been approved by the Planning Committee. The timing would be dependent on the ecology (the peregrine falcon breeding site) of the area. We note that courtship and mating occurs in March through May, and that the chicks are born around 33 days after mating.

Once the demolition had been completed work would begin on Phase 3 (the Muse Application). We understand that the anticipated duration of the building of Phases 3 and Phases 1 & 2 would be two and a half-years.

3. Water table level issues and water ingress into the site

From the responses to WRRRA questions during the site visit and from the Application documentation, it became clear that the cause of the on-going flooding cannot be fully investigated until the structural removal of the two wings of Building 3 and Building 36 are completed.

We are concerned that approval is being sought for the construction of Phases 1 & 2 without any guarantee that the work will eventually be able to be completed. There is no Phase 4 option! The outcome of the investigations could result in only a redacted Phase being constructed, which would be financially challenging to Lovell.

In the course of our objections to both the current Muse and Lovell applications, and to the initial application in 2019, we highlighted features of the sub-ground level water distribution with the site. These included a major artesian well which provided a constant source of the high-purity water that is essential for pharmaceutical production and is a core reason why Novartis decided to make the site a major manufacturing centre in the mid-2000s. To move the water around the site Novartis constructed a network of tunnels that carried water and other utilities about the site that would also maintain the integrity of the production systems in the event of (for example a fire) and to maintain 24 hour production.

WRRRA recognise that Lovells will be using the SuDs system of surface water drainage on site as recommended by the LLFA and that Southern Water have agreed there is currently capacity in the drainage network to accommodate this system. We still have concerns on how this system will impact the aged network of drains and sewers running through the adjacent Richmond Road Conservation Area. It should be noted

that surface water drainage systems can also cause flooding when their capacity is exceeded and they are not well maintained.

We now have significant concerns about the impact this high density build will have on sub-surface and underground water, an issue which has recently come to light in the Arch Associates report.

To quote from the report on the subject of water ingress into the basement of Building 3

“The basement of the building is flooded and has done so for a significant number of years. In a refurbishment scenario this would need to be pumped out to allow a waterproofing system to be retrofitted. Suitable measures for draining of water should be provided and maintenance strategies will also be required to ensure the waterproofing system remains effective.

During on-site testing in the summer, the basement was pumped out to establish the extent of the water ingress. Within 24 hours the basement became flooded again, it is now anticipated to be over 2 metres deep, in a period of relatively dry weather conditions. It is likely that this ongoing water ingress is further damaging the concrete including its reinforcement.”

This raises the issue about why Lovell was seemingly unaware of this long-term issue of basement flooding given that the firm would have had open access to the site and that the Application states that 77 car park spaces will be made available in the basement.

The Application makes no reference to the potential reduction in car park spaces if a permanent solution to the flooding cannot be implemented.

4. Basement water ingress in the Richmond Road Conservation Area

The Former Novartis Site sits on land with active underground water, a remnant of historical streams. These water sources originate near Horsham Hospital, Collyers College and also further East from Foundry Lane. Building over these streams will increase both surface and sewer flooding due to inadequate capacity and potential blockages of the old Victorian -era culverts.

Many of the Victorian/Edwardian properties in the surrounding Richmond Road Conservation area were constructed with foundations in direct contact with the ground and are more susceptible to moisture problems. These issues have noticeably increased since several recent housing estates have been built bordering the area, leading to expensive remedial works from water ingress on low lying rooms and sump pumps fitted to cellars. There is also evidence of sitting water in garden areas.

The diversion of water from around this site, due to the dense housing, deep foundations and increased hard surfaces, which alter natural drainage patterns, is

concerning to our residents. Some residents are in the process of monitoring their properties going forward.

We look forward in due course to being informed about the outcomes of the research into the water level issues on site so that WRRRA members are able to assess impact the proposed development might have on their properties in the future.

We continue to request the on-going monitoring of Horsham Park Pond. Horsham Park is an award winning park and all historical and recent land surveys have highlighted the vulnerability of drainage into the pond.

5. Demolition work

Clearly the demolition of the two buildings will generate a considerable volume of rubble. A conservative estimate would be 2000 cubic metres, or around 3000 metric tons. When we raised this question at the site visit there was no response to our query about the volume of rubble, even though it would have figured in the RIBA State 2 Cost Estimate that Lovell had commissioned to show that cost of demolition was broadly the same as the cost of the complex refurbishment that would otherwise have been required.

When Building 3 was constructed the clock tower was an integral component of the entire building. It was stated at the site visit that the internal aesthetic features of the clock tower are being protected but we would welcome reassurance that the structural integrity of the clock tower will not be impacted through the demolition of the two wings.

At the site meeting on 17 December Lovells did state that a large proportion of the rubble would be used on site to create the foundations for the internal roadways and hard standings. These represent less than a mile in total length.

We would question the basis of this commitment.

There are specifications for hard-core used as the basis for the construction of roads, which are set out in the UK's Specification for Highways Works. For most purposes a hard-core mix to MOT Type 1 can be used. This is a product made from crushed granite, basalt, gritstone or carboniferous limestone (depending on source). The size range is generally 40mm down to dust. Having researched this our understanding is that the rubble from the demolition would have to be taken off site and processed through a rock grinder – it could not be directly used in the road construction.

The rubble from the demolition would also vary widely in character, including concrete, hard standings, brick, glass and steel.

However, the Applicant has highlighted the use of a SuDS drainage system for both sites. This requires the surfaces of roads and pathways to have a high degree of porosity. For these purposes Type 3 sub-base, defined under SHW Clause 805, also uses stone up to 40 mm but contains fewer fines, resulting in an open-graded structure with more voids. This makes it highly permeable and suitable for Sustainable Urban Drainage Systems (SuDS), permeable pavements, and areas where water drainage through the sub-base is essential.

Failure to construct the roadways to this specification could invalidate insurance cover in the case of flooding or subsidence.

The end result is that in our opinion all the demolition rubble will need to be transported off-site for processing to a Type 3 sub-base mixture.

The figure of 3000 metric tons is very much a back-of-the-envelope estimate based on the cubic volume of the buildings. The large tipper truck would typically take a 25 tonne load so that would equate to 240 vehicle movements (one to enter the site and one to leave) over the course of the demolition.

6. Vehicular site access prior to building completion

In our submission to DC/25/0415 we highlighted the difficulties of leaving and entering the site via the Parsonage Road site

Our focus at that time was on the situations that residents and visitors would experience with site access. Those concerns remain.

Our focus now is on the way in which vehicular traffic is going to be managed in the following stages of work

- Demolition
- Building Phase 3
- Building Phase 1 & 2

7. Demolition of Buildings 3 and 36

The figures we have suggested for total vehicle traffic for the demolition are of course estimates, and we are sure that Lovells will be able to respond with the actual figures on both the scale of rubble generated by the demolition and the extent to which it will be reused immediately on site ahead of the Planning Committee meeting. This is because both would have a direct impact on the Conditions of Access and yet the issues caused by the doubling of the amount of rubble are not discussed at all.

In response to a question from WRRRA at the site visit about vehicular access to the site the reply was that the Parsonage Road exit “will probably be used”. We are concerned about under what circumstances the Wimblehurst Road exit will be used.

The Committee briefing dated 21 October or the DC/25/0415 Planning meeting stated that

“The main access to the Novartis site was from Wimblehurst Road with an additional access from Parsonage Road.”

This is incorrect and in our opinion misleading. From the time that the CIBA office was commissioned in 1936 the primary access route for employees and commercial deliveries was through a security-controlled gate in Parsonage Road. The Wimblehurst Road entrance was used only for visitors who were able to park directly in front of the main building. In 1996 CIBA-Geigy merged with Sandoz, which then adopted the Novartis name.

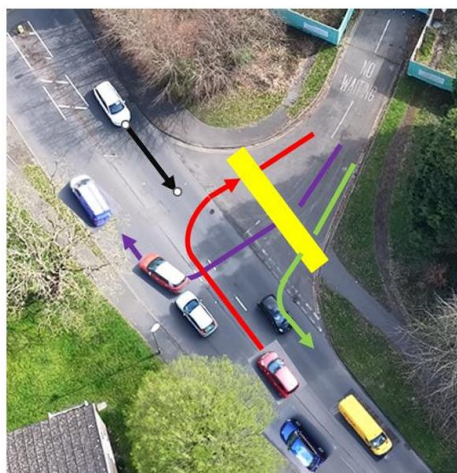
The number of visitors arriving by car each day was very low. A reason for the selection of Horsham for the CIBA building was the excellent rail links to the site from London Bridge, Victoria, Waterloo, Guildford and Gatwick Airport.

Even with the light traffic conditions, in the late 1970s a survey of CIBA employees undertaken in 1978 showed a unanimous concern about the dangers of cars entering and leaving the site through the Wimblehurst Road gate.

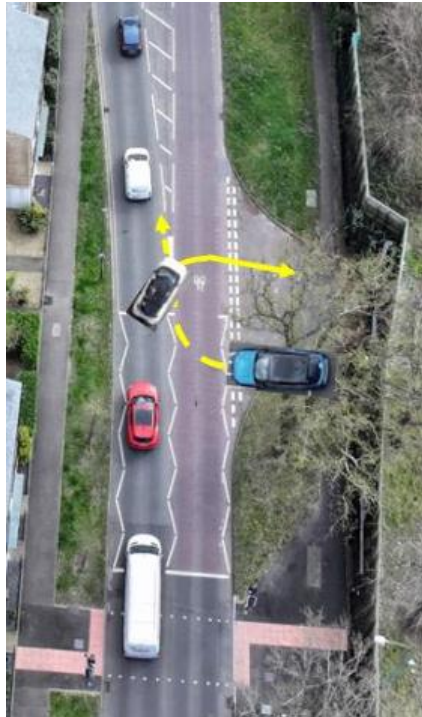
This led to the provision of a ghost lane for visitors turning right into the site from Wimblehurst Road, where they were able to use a small car park to the left of the boulevard to the main building. Employees entered and left the site through the Parsonage Road gate and could make use of the car park in front of the building by driving around the office building.

These developments can be tracked in Planning Applications NH/38/93 (1992), NH/52/93 (1993), NH/83/94 (1994) and NH/166/99 (1999).

A photomontage created from drone photographs commissioned by WRRRA gives an indication of the complex paths of traffic at the Wimblehurst Road exit. The yellow path is the pedestrian route.



In the case of the Parsonage Road entrance the paths are shown in the photomontage below.



In the process of demolition 25 tonne tipper lorries will approach the site from the level crossing at the top of the photograph. As they approach the junction they will need to slow down and take a fairly wide placement on the traffic lane to cope with the acute left turn, given the turning radius of these lorries.

The exit will be more challenging. The fully-laden lorry will need to have a good period of time to cross the first lane of traffic and turn into the east-bound lane.

The laden lorry will inevitably travel slowly towards the crossing, perhaps at just 15 mph rather than 30 mph of other traffic. It will also need to slow down in good time as barriers come down. These actions will all result in a queue building up behind the lorry.

Once over the crossing the lorry driver is faced with a gradual incline along Parsonage Road to the Ruser Road roundabout, again holding back cars.

Building Phase 3

Based on the comments from Lovell about the re-use of demolition rubble on Phase 3 our assumption is that the groundwork will be initiated before the demolition of Buildings 3 and 36 is complete. Also at this stage work will be undertaken to establish the extent to which additional work will need to be undertaken to ameliorate the water level issues.

As the building of Phase 3 accelerates, the combined volume of traffic serving both site areas will be substantial and will have a significant impact on the flow of traffic along Parsonage Road and over the railway crossing.

WRRRA will watch with interest the extent to which traffic is impacted as we have made it very clear in our submissions that the single access point for the entire site is inadequate to support the flow of residential traffic once the development is completed.

Building Phase 1 & 2

Constructing the new build around the Clock Tower is going to require a considerable volume of traffic bringing in the material for the new wings. If this is going to take place whilst Phase 3 is still being completed again the overall volume of construction is going to be very high.

8. A cause for concern

We have a major concern about whether Lovell will be able to deliver the number of houses and car parking spaces as set out in the Application. There are fundamental issues relating to the effective management of water egress across the site which will not be able to be identified (and solutions proposed and agreed with HDC) until demolition is complete in late 2026. The track record of Lovell over the recent period and the 'sudden' discovery that a building constructed in 1938/1939 may not long be fit for the purpose of refurbishment does not inspire us with confidence.

Any failure, even if only partial, to deliver the commitments set out in DC/25/0629 would have a major impact on the success of the entire site development.