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Via email

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[nexusplanning.co.uk](http://nexusplanning.co.uk)

21 November 2025

Our Ref: 40263

Your Ref: DC/25/0629

Dear Jason,

**Submission of additional information and responses to consultee comments for planning application ref. DC/25/0629  
– Former Novartis Site, Parsonage Road, Horsham, West Sussex**

We have been instructed by our client, Lovell Partnerships ('the Applicant'), to prepare and submit a package of additional information in respect of planning application ref. DC/25/0629. The purpose of this submission is to:

1. Supplement and/or supersede material previously submitted as part of the planning application to reflect design changes to the scheme.
2. Provide detailed responses to the consultation responses received during the statutory consultation period.

This document should be read alongside the submitted documents listed in Table 1. These documents collectively form the basis of the revised application submission.

## **1. Amendments to the scheme design**

### **The 'wings' of Building 3**

There are two existing buildings on the site, one of which is known as *Building 3*. It is an Art Deco structure with a central tower rising to approximately five storeys. It is listed on the Horsham Town Local List (February 2011) as a 'non-designated heritage asset', recognised for its historical significance and architectural style from the interwar period.

The planning application originally proposed the conversion of *Building 3* to provide residential accommodation.

Since the original submission, detailed structural investigations have identified significant deficiencies in the structural integrity of *Building 3*. A Structural Report has been prepared that explains the findings of these investigations, which finds that there are wide ranging challenges associated with structural instability and non-compliance with current standards. With reference to the submitted structural report, in summary the challenges include corroded wall ties, external brickwork cracking, water ingress, and basement degradation.

The consequence of these structural deficiencies is that the 'wings' of *Building 3* cannot reasonably be converted. These parts of the building require replacement.

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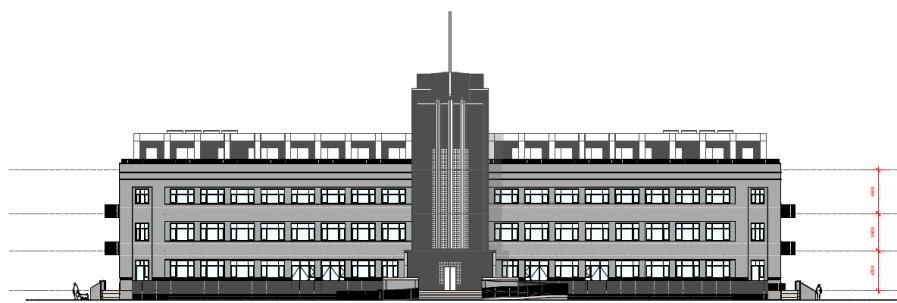
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The central section of the building, which includes the clock tower, has not been affected by the structural problems that have impacted the 'wings' to the same extent. This means that this part of the building, which is of the greatest heritage significance, can be retained and converted as originally planned.

This amended scheme is therefore to retain and convert the central clock tower in line with the original proposals, and to replace the 'wings' of the building with high-quality and architecturally sympathetic replacement buildings of an equivalent footprint and size. The same number of new homes would be provided within these parts of the building as was proposed in the original application.

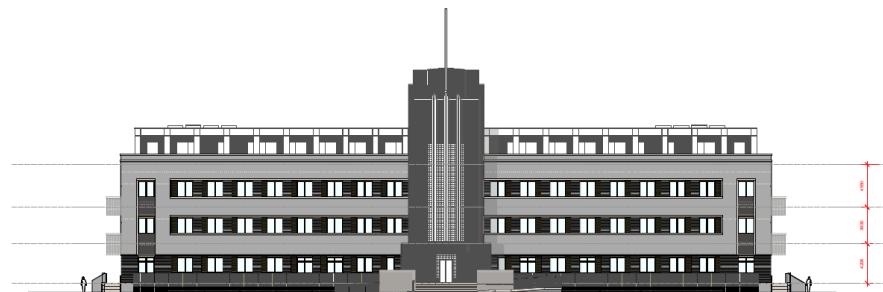
Replacing the ‘wings’ would allow the scheme to meet relevant design, energy and safety standards, and would deliver a scheme capable of receiving insurances and warranties.

CURRENT PLANNING APPLICATION NORTH WEST ELEVATION



The existing non-designated heritage asset building stands within the context of the surrounding apartment buildings. Its central tower, retained a strong vertical emphasis and the symmetrically arranged wings, gave the structure a sense of grandeur and establishes it as a key focal point upon arrival to the site.

### PROPOSED NORTH WEST ELEVATION



*Figure 1. Extract of Design and Access Statement showing the Current Planning Application and proposed North-West elevation.*

## Introduction of a commercial use

In addition, these amendments propose the introduction of a commercial unit at ground floor level within Building 3. This is in direct response to feedback on the original scheme, where a number of residents queried whether some form of commercial operation could be provided at the site to provide for some of the day-to-day needs of residents of the development, and the local community.

It is therefore proposed to provide a flexible 'Class E' Unit at ground floor level. It is anticipated that this would be used as a flexible office space / cafe for residents and other local people to work from away from their homes. It is important

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to note from the outset that it is not currently clear that there would be market demand available to sustain such a use, and so whilst the Applicant would use their best endeavours to deliver this use, any planning permission would provide for circumstances for this part of the site to come forward as an apartment if no market demand existed.

No additional car parking is required to serve this commercial unit because it would be aimed at residents who lived within the development or nearby, and who would walk or cycle to the site.



Figure 2. Extract of Site Plan (Ground Floor) Showing commercial unit at ground floor level within Building 3.

#### Description of development and submission documents

As a consequence of these amendments to the scheme design, the description of the proposed development should read as follows:

*Residential development comprising approximately 206 dwellings, including the part-demolition and conversion 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.*

Plans, documents and reports have been updated to reflect these amendments to the scheme design, together with adjustments required to address consultation responses received to the application. A schedule of these revised documents, including the material that they supersede is provided at Appendix A.

## 2. Responses to consultation responses

The planning application was consulted upon when it was submitted in April 2025, and this process generated responses from statutory consultees. These have been responded to in detail, and supporting application information updated where required. A schedule of responses to comments received is provided at Appendix B.

### Next steps

We would be grateful if you could initiate a 're-consultation' exercise on the planning application, noting the revised description of development and the revised application material, responding to the 'first round' of consultation responses received. Thereafter, we look forward to the application being reported to the Planning Committee at the earliest available opportunity.

Should any further comments arise because of these responses, please do not hesitate to share them and we will provide a response.

Yours sincerely

**Matthew Brooksbank**

Associate

[Redacted signature]

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## Appendix A: Revised Proposals: list of deliverables

The table below shows the deliverables which collectively form the basis of the revised application submission. This letter should be read in conjunction with the documents listed, which act to supplement or supersede previously submitted information.

Enclosed Document Name	Enclosed Document Ref	Superseded Document Name	Superseded Document Ref
<b>Existing Heritage Building &amp; Office Block - Basement Floor Demo Plan</b>	<b>HOR-ACG-ZZ-BF-DR-A-2101-P3</b>	Existing Heritage Building & Office Block - Basement Floor Demo Plan	HOR-ACG-ZZ-BF-DR-A-2101-P2
<b>Existing Heritage Building &amp; Office Block - Ground Floor Demo Plan</b>	<b>HOR-ACG-ZZ-00-DR-A-2102-P3</b>	Existing Heritage Building & Office Block - Ground Floor Demo Plan	HOR-ACG-ZZ-00-DR-A-2102-P2
<b>Existing Heritage Building &amp; Office Block - First Floor Demo Plan</b>	<b>HOR-ACG-ZZ-ZZ-DR-A-2103-P3</b>	Existing Heritage Building & Office Block - First Floor Demo Plan	HOR-ACG-ZZ-ZZ-DR-A-2103-P2
<b>Existing Heritage Building &amp; Office Block - Second Floor Demo Plan</b>	<b>HOR-ACG-ZZ-02-DR-A-2104-P3</b>	Existing Heritage Building & Office Block - Second Floor Demo Plan	HOR-ACG-ZZ-02-DR-A-2104-P2
<b>Existing Heritage Building &amp; Office Block - Third Floor Demo Plan</b>	<b>HOR-ACG-ZZ-03-DR-A-2105-P3</b>	Existing Heritage Building & Office Block - Third Floor Demo Plan	HOR-ACG-ZZ-03-DR-A-2105-P2
<b>Existing Heritage Building &amp; Office Block - Fourth Floor Demo Plan</b>	<b>HOR-ACG-ZZ-04-DR-A-2106-P3</b>	Existing Heritage Building & Office Block - Fourth Floor Demo Plan	HOR-ACG-ZZ-04-DR-A-2106-P2
<b>Existing Heritage Building &amp; Office Block - Roof Demo Plan</b>	<b>HOR-ACG-ZZ-RF-DR-A-2107-P3</b>	Existing Heritage Building & Office Block - Roof Demo Plan	HOR-ACG-ZZ-RF-DR-A-2107-P2
<b>Existing Heritage Building &amp; Office Block - Overall Demo Elevations</b>	<b>HOR-ACG-ZZ-ZZ-DR-A-4101-P3</b>	Existing Heritage Building & Office Block - Overall Demo Elevations	HOR-ACG-ZZ-ZZ-DR-A-4101-P2

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Enclosed Document Name	Enclosed Document Ref	Superseded Document Name	Superseded Document Ref
Existing Heritage Building & Office Block - Overall Demo Elevations	HOR-ACG-ZZ-ZZ-DR-A-4102-P3	Existing Heritage Building & Office Block - Overall Demo Elevations	HOR-ACG-ZZ-ZZ-DR-A-4102-P2
Site Plan - Ground Floor - Lovell Site	HOR-ACG-XX-ZZ-DR-A-1061-P5	Site Plan - Ground Floor - Lovell Site	HOR-ACG-XX-ZZ-DR-A-1061-P3
Site Plan - First Floor - Lovell Site	HOR-ACG-XX-01-DR-A-1062-P3	Site Plan - First Floor - Lovell Site	HOR-ACG-XX-01-DR-A-1062-P2
Site Plan - Second Floor - Lovell Site	HOR-ACG-XX-02-DR-A-1063-P3	Site Plan - Second Floor - Lovell Site	HOR-ACG-XX-02-DR-A-1063-P2
Site Plan - Third Floor - Lovell Site	HOR-ACG-XX-03-DR-A-1064-P3	Site Plan - Third Floor - Lovell Site	HOR-ACG-XX-03-DR-A-1064-P2
Site Plan - Fourth Floor - Lovell Site	HOR-ACG-XX-04-DR-A-1065-P3	Site Plan - Fourth Floor - Lovell Site	HOR-ACG-XX-04-DR-A-1065-P2
Heritage Building C14 and Apartment Blocks C11 C12 C13 C15 - Basement Floor GA Plan	HOR-ACG-ZZ-BF-DR-A-2000-P6	Heritage Building C14 and Apartment Blocks C11 C12 C13 C15 - Basement Floor GA Plan	HOR-ACG-ZZ-BF-DR-A-2000-P4
Heritage Building C14 and Apartment Blocks C11 C12 C13 C15 - Ground Floor GA Plan	HOR-ACG-ZZ-00-DR-A-2001-P7	Heritage Building C14 and Apartment Blocks C11 C12 C13 C15 - Ground Floor GA Plan	HOR-ACG-ZZ-00-DR-A-2001-P4
Heritage Building C14 and Apartment Blocks C11 C12 C13 C15 - First Floor GA Plan	HOR-ACG-ZZ-01-DR-A-2002-P7	Heritage Building C14 and Apartment Blocks C11 C12 C13 C15 - First Floor GA Plan	HOR-ACG-ZZ-01-DR-A-2002-P4
Heritage Building C14 and Apartment Blocks C11 C12 C13 C15 - Second Floor GA Plan	HOR-ACG-ZZ-02-DR-A-2003-P7	Heritage Building C14 and Apartment Blocks C11 C12 C13 C15 - Second Floor GA Plan	HOR-ACG-ZZ-02-DR-A-2003-P4
Heritage Building C14 and Apartment Blocks C11 C12 C13 C15 - Third Floor GA Plan	HOR-ACG-ZZ-03-DR-A-2004-P7	Heritage Building C14 and Apartment Blocks C11 C12 C13 C15 - Third Floor GA Plan	HOR-ACG-ZZ-03-DR-A-2004-P4

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Enclosed Document Name	Enclosed Document Ref	Superseded Document Name	Superseded Document Ref
<b>Heritage Building C14 and Apartment Blocks C11 C12 C13 C15 - Fourth Floor GA Plan</b>	<b>HOR-ACG-ZZ-04-DR-A-2005-P6</b>	Heritage Building C14 and Apartment Blocks C11 C12 C13 C15 - Fourth Floor GA Plan	HOR-ACG-ZZ-04-DR-A-2005-P4
<b>Heritage Building C14 and Apartment Blocks C11 C12 C13 C15 - Roof Plan</b>	<b>HOR-ACG-ZZ-RF-DR-A-2006-P6</b>	Heritage Building C14 and Apartment Blocks C11 C12 C13 C15 - Roof Plan	HOR-ACG-ZZ-RF-DR-A-2006-P4
<b>Heritage Building C14 and Apartment Blocks C11 C12 C13 C15 - Overall Elevations</b>	<b>HOR-ACG-ZZ-ZZ-DR-A-4000-P6</b>	Heritage Building C14 and Apartment Blocks C11 C12 C13 C15 - Overall Elevations	HOR-ACG-ZZ-ZZ-DR-A-4000-P3
<b>Apartment Blocks C11 and C15 - Overall Elevations</b>	<b>HOR-ACG-ZZ-ZZ-DR-A-4001-P4</b>	Apartment Blocks C11 and C15 - Overall Elevations	HOR-ACG-ZZ-ZZ-DR-A-4001-P3
<b>Heritage Building C14 and Apartment Blocks C11 C12 C13 C15 - Overall Elevations</b>	<b>HOR-ACG-ZZ-ZZ-DR-A-4002-P6</b>	Heritage Building C14 and Apartment Blocks C11 C12 C13 C15 - Overall Elevations	HOR-ACG-ZZ-ZZ-DR-A-4002-P3
<b>Heritage Building C14 and Apartment Blocks C11 C12 C13 C15 - Overall Elevations</b>	<b>HOR-ACG-ZZ-ZZ-DR-A-4003-P6</b>	Heritage Building C14 and Apartment Blocks C11 C12 C13 C15 - Overall Elevations	HOR-ACG-ZZ-ZZ-DR-A-4003-P3
<b>Site Plan – Ground Floor – Unit Mix</b>	<b>HOR-ACG-XX-00-DA-A-1070-P5</b>	Site Plan – Ground Floor – Unit Mix	HOR-ACG-XX-00-DA-A-1070-P4
<b>Site Plan – First Floor – Unit Mix</b>	<b>HOR-ACG-XX-01-DA-A-1071-P5</b>	Site Plan – First Floor – Unit Mix	HOR-ACG-XX-01-DA-A-1071-P4
<b>Site Plan – Second Floor – Unit Mix</b>	<b>HOR-ACG-XX-02-DA-A-1072-P5</b>	Site Plan – Second Floor – Unit Mix	HOR-ACG-XX-02-DA-A-1072-P4
<b>Site Plan – Third Floor – Unit Mix</b>	<b>HOR-ACG-XX-03-DA-A-1073-P5</b>	Site Plan – Third Floor – Unit Mix	HOR-ACG-XX-03-DA-A-1073-P4
<b>Site Plan – Fourth Floor – Unit Mix</b>	<b>HOR-ACG-XX-04-DA-A-1074-P5</b>	Site Plan – Fourth Floor – Unit Mix	HOR-ACG-XX-04-DA-A-1074-P4

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Enclosed Document Name	Enclosed Document Ref	Superseded Document Name	Superseded Document Ref
Site Plan - Tenure	<b>HOR-ACG-XX-00-DA-A-1080-P4</b>	Site Plan - Tenure	HOR-ACG-XX-00-DA-A-1080-P3
Site Plan – Vehicular Parking	<b>HOR-ACG-XX-00-DA-A-1081-P3</b>	Site Plan – Vehicular Parking	HOR-ACG-XX-00-DA-A-1081-P2
Non Designated Heritage Asset Design & Access Statement	<b>HOR-ACG-XX-00-DA-A-1903-P2</b>	Non Designated Heritage Asset Design & Access Statement	HOR-ACG-XX-00-DA-A-1903-P1
Accommodation Schedule	<b>HOR-ACG-XX-XX-DR-A-9300-P5</b>	Accommodation Schedule	HOR-ACG-XX-XX-DR-A-9300-P2
Architectural Materials Bay Elevations	<b>HOR-ACG-XX-XX-DR-A-9806-P3</b>	Architectural Materials Bay Elevations	HOR-ACG-XX-XX-DR-A-9806-P2
Drainage Strategy and Flood Risk Assessment	<b>Rev A</b>	Drainage Strategy and Flood Risk Assessment	Rev 0
Water Neutrality Report (Rev P7)	<b>P7</b>	Water Neutrality Report (Rev P2)	P2
Supplementary Highways Note	<b>183.0009/SHN/1</b>	N/A – supplementary to submitted TA.	N/A
Addendum Transport Assessment	<b>183.0009ATA1</b>	N/A - supplementary to submitted TA.	N/A
Walking and cycling Audit	<b>183.0009WCA1</b>	N/A - supplementary to submitted TA.	N/A
Travel Plan	<b>183.0009/TP/3</b>	Travel Plan	183.0009/TP/2
Land Budget Plan	<b>D3438-FAB-00-XX-DR-L-9000</b>	N/A	N/A
Ecology – Interim Note	<b>10 September 2025</b>	N/A – supplementary to submitted ecological report.	N/A
Ecology - Falcon Mitigation Strategy	<b>FV02</b>	N/A – supplementary to submitted ecological report.	N/A
Ecology – Bird Survey Report	<b>FV01</b>	N/A – supplementary to submitted ecological report.	N/A
Ecology Habitat Management and Monitoring Plan	<b>FV01</b>	N/A – supplementary to submitted ecological report.	N/A

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Enclosed Document Name	Enclosed Document Ref	Superseded Document Name	Superseded Document Ref
Ecology PRA	<b>FV01</b>	N/A – supplementary to submitted ecological report.	N/A
Ecology PRF	<b>FV01</b>	N/A – supplementary to submitted ecological report.	N/A
Daylight and Sunlight – Technical Note	<b>23 September 2025</b>	N/A – supplementary to submitted Daylight & Sunlight Assessment.	N/A
Consideration of Building 3 Paper	<b>N/A</b>	N/A – New document	N/A
Structural Condition Survey (Appendix A to <b>23/10/2025</b> <i>Consideration of Building 3 Paper</i> )		N/A	N/A
Air Quality Assessment	<b>2509761_03</b>	Air Quality Assessment	2509761_02
Air Quality Technical Note	<b>22/08/2025</b>	N/A	N/A
Noise and Vibration Technical Note	<b>23/06/2025</b>	N/A	N/A
Tree Survey and Arb Implications Assessment	<b>12011 Rev nil</b>	Tree Survey and Arb Implications Assessment	11380 Rev nil
Energy Report (SAPS and Overheating)	<b>D2548-WSD-XX-XX-RP-ME-0300</b>	N/A – New document	N/A
Revised Heritage Statement	<b>September 2025</b>	Heritage Statement	March 2025

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## Appendix B: Responses to Consultee Comments

The statutory consultation period associated with the planning application has now concluded. All consultee and public comments have now been shared with the applicant and their appointed consultants.

While it is recognised that some re-consultation may result from the updated submission, this document summarises the comments received from the consultees listed below and sets out the applicant's detailed responses to each.

Responses to public comments are also included and are organised thematically for clarity.

Consultee	Page reference
Southern Water	12
Lead Local Flood Authority (LLFA)	13
Network Rail	14
Public Health and Licencing (Environmental Health) – Air Quality	15
Public Health and Licencing (Environmental Health) – Noise	21
Sussex Police	25
County Planning Minerals and Waste	25
London Gatwick Airport	26
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*Table 1 Responses to Consultee Comments - Contents*

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## Southern Water

Southern Water responded to the application on 4<sup>th</sup> June 2025. A response is provided on behalf of the Applicant by Arch Associates (Flood Risk Consultants).

Southern Water comment (summarised)	Applicant team response
Southern Water requires a formal application for a connection to the public sewer to be made by the applicant or developer.	A formal application to connect will be made at the appropriate time.
<p>Proposed SuDS</p> <p>Southern Water confirms that if SuDS are proposed for adoption, the system must be designed and constructed in accordance with the relevant Guidance. SuDS should form part of a continuous sewer system rather than an isolated component. No soakaways should connect to the public surface water sewer.</p> <p>Where SuDS components are not adoptable, the applicant must ensure long-term maintenance arrangements are in place.</p> <p>Where SuDS are proposed, drainage details submitted to the Local Planning Authority must define implementation responsibilities; include an implementation timetable; provide a management and maintenance plan for the lifetime of the development, including adoption or other long-term arrangements.</p>	Drainage is not intended to be offered for adoption. A maintenance plan has been provided for the non-adopted SuDS components as part of the application.

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## Lead Local Flood Authority (LLFA)

The LLFA responded to the application on 21<sup>st</sup> May 2025. A response is provided on behalf of the applicant by planning consultant Nexus Planning (Planning Agent) and Arch Associates (Flood Risk Consultants).

LLFA comment (summarised)	Applicant team response
The updated Flood Map for Planning mapping must be used, to ensure the FRA is using up to date information.	The submitted Revised Flood Risk Assessment is updated to show latest flood mapping for completeness.
The foul pumping station is in close proximity to the permeable paving, which could create water quality issues. Southern Water/adoption body will be best place to comment on this in more detail.	Southern Water did not identify any issues with the proposed foul pumping station location in their consultation response and ultimately the permeable paving is a tanked system, and the package pumping station is a buried sealed system.
The catchment plan is unclear.	Catchment plan legend simplified.
The exceedance plan shows flows could end up on the railway, which would create disruption. The exceedance plan must show the depth and area of flooding in 1 in 100 year plus climate change event.	Our strategy confirms that generally all storms up to the 1:100YR+45%CC 6 hour storm event are contained within the system with no exceedance flow on site apart from a total flooding volume of 8m <sup>3</sup> (previously 2m <sup>3</sup> prior to requested change to set additional storage to 0%) over the whole development. All storms up to this event are contained within the site. The exceedance routing drawing is a notional mapping of general flow paths in the extremely unlikely event of a catastrophic failure of the system, or indeed a design storm greater than the 1 in 100 year + climate change + urban creep scenario.
In the calculations, 30 year plus climate change results are needed. The additional storage should be set to 0.	Please refer to updated report. Updated calculations showing the 1:30YR+45%CC provided. Additional storage set to 0.

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The greenfield runoff rate calculations appear to be missing. The applicant is reminded that brownfield sites should be limited to as close to greenfield rates as is reasonably practicable. If greenfield runoff rates cannot be achieved, we need clear evidence as to why a lower rate cannot be achieved	Refer to the updated report for detail on the existing runoff rates within the existing site drainage section.
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### Network Rail

Network Rail (NR) responded to the application on 05 June 2025. A response is provided on behalf of the applicant by Nexus Planning (Planning Agent), Arch Associates (Flood Risk Consultants), and Fabrik (Landscape Architecture).

Network Rail comment (summarised)	Applicant team response
Due to the close proximity of the proposed development to Network Rail's land and the operational railway, Network Rail requests the applicant / developer engages Network Rail's Asset Protection and Optimisation (ASPRO) team prior to works commencing. This will allow our ASPRO team to review the details of the proposal to ensure that the works can be completed without any risk to the operational railway.	Network Rail's ASPRO team have been engaged during the planning phase and comments made have been incorporated into the drainage design, such as maintaining a 25m offset from attenuation tanks to Network Rail's boundary.
In addition, Network Rail would like to see exceedance mapping to show the pre-development conditions vs. the post-development exceedance flow routes, as well as a similar comparison on actual flow rates too. As discrete drainage features are being created, this could create a concentration feature during an exceedance event. Also, which return periods are defined in the calculations as an "extreme event"?	Our strategy confirms that generally all storms up to the 1:100YR+45%CC 6 hour storm event are contained within the system with no exceedance flow on site apart from a total flooding volume of 8m <sup>3</sup> (previously 2m <sup>3</sup> prior to requested change to set additional storage to 0% by the LLFA) over the whole development. All storms up to this event are contained within the site. The exceedance routing drawing is a notional mapping of general flow paths in the extremely unlikely event of a catastrophic failure of the system, or indeed a design storm greater than the 1 in 100 year + climate change + urban creep scenario. The existing drainage strategy for the Novartis site comprised a gravity sewer system with no attenuation for an almost entirely impermeable site. The

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	proposed scheme shows a reduction in total impermeable area and the proposed discharge rates indicate a significant betterment than existing.
The applicant / developer may be required to enter into an Asset Protection Agreement to get the required resource and expertise on-board to enable approval of detailed works.	Network Rail's ASPRO team have been engaged during the planning phase and comments made have been incorporated into the drainage design, such as maintaining a 25m offset from attenuation tanks to Network Rail's boundary.

#### Public Health and Licencing (Environmental Health) – Air Quality

Environmental Health responded to the application on 14<sup>th</sup> May 2025. A response is provided on behalf of the applicant by RWDI Ltd (Air Quality Consultants).

Environmental Health comment (summarised)	Applicant team response
Damage Cost Calculation – I tried to replicate the damage-cost calculations using the same inputs you provided in the Air Quality Assessment but got higher outputs for NOx and PM2.5 than you reported. Please could you check your results, and include a detailed breakdown of your workings as supporting evidence? The annual emission figures should then be entered into the Damage Cost Toolkit: Start year = 2027 (opening year) End year = 2031 Price base year = 2025 (baseline year for the project appraisal)	<p>It is noted that the time taken to prepare the report, this section was not updated to reflect the submission date and proposed opening year. As a result, the damage cost assessment has been reassessed to take this into consideration.</p> <p>Emission Factor Toolkit Input</p> <p>Emissions Factor Toolkit version 12.1 has been used for this assessment, as this is the version available at time of submission of the application.</p> <p>The trip rate (vehicle trips per day) for the development was provided by Paul Basham Associated that concluded there would be 1,125 trips produced by the proposed development with 2% HDVs. The selected area is 'England (not London)' and the selected road type is 'Urban (Not London)'. Inputs of speed and link length are selected as per the Sussex guidance, as follows:</p>

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<ul style="list-style-type: none"> <li>•Traffic Flow: 1125</li> <li>•% HDV: 2</li> <li>•Speed (kph): 50</li> <li>•No of hours: 24</li> <li>•Link Length (km): 10</li> </ul> <p>Damage Cost Appraisal Toolkit Input</p> <p>The length of the appraisal period is five years, starting in 2027 (proposed opening year) and ending in 2031. The selected pollutant sector is 'Road Transport Urban Medium' for both NOX and PM2.5. The central present value outputs for both pollutants are presented for the appraisal period and are added together to calculate the total five-year damage cost value is presented.</p> <p>Damage Cost</p> <p>The five-year air quality damage cost of the development was calculated to be £12,409. The calculation of the five-year damage cost is presented below in Table 1.</p> <p>The five-year damage cost represents the minimum sum of money that must be spent on the implementation of practical mitigation measures to aid in off-setting adverse air quality impacts from the development, in line with the Sussex guidance.</p>	
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**Table 1: Five-Year Air Quality Damage Cost Calculation**

Trip Rate for Development (vehicle trips per day)		1,125	
Pollutant		NOx	PM <sub>2.5</sub>
Emissions (tonnes/annum)	2025	0.1604	0.0206
	2026	0.1395	0.0205
	2027	0.1204	0.0203
	2028	0.1033	0.0202
	2029	0.0887	0.0201
	Five-year (Central Present Value) Damage Cost (£)	5,733	6,676
Five-year Damage Cost NOx + PM <sub>2.5</sub> (£)		<b>12,409</b>	

#### Air Quality Mitigation Plan –

Sussex Air (2021) Air Quality and Emissions Mitigation Guidance for Sussex takes a low-emission strategies' approach to avoid health impacts of cumulative development, by seeking to mitigate or offset emissions from the additional traffic and buildings. It is recommended that the emission mitigation statement contain itemised costing for each proposed mitigation option and total value of all proposed emissions' mitigation. This should be equal to the value from Emissions calculation and total calculated value of emissions' health damage cost. Sussex Air quality guidance aims to avoid the duplication of measures that would normally be required through other regimes.

To offset the Damage Cost value of £12,409, the following mitigation measure has been agreed with the client to be implemented.

A one-off £150 travel voucher will be provided to each household for either:

- A contribution towards a bus ticket;
- Reimbursement on rail travel;
- Cycle voucher; or
- Cycle training through West Sussex County Council.

This will promote sustainable forms of transport in the surrounding area.

There are 159 apartments and 47 residential houses planned as part of the development. This equates to 206 units in total. Therefore, the cost to this mitigation measure will be £30,900.

This value exceeds the damage cost value and therefore offsets it.

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	<p>Additionally, there are also proposals to include a permissive cycle route through the site, which would tie into the adjacent application. The purpose is to provide a more favourable route than the existing Wimblehurst Road/Parsonage Road route and avoiding the North Heath Lane/Parsonage Road/Wimblehurst Road roundabout. This is expected to promote more sustainable and healthier forms of transport.</p> <p>There are also conversations regarding likely contributions towards wider off-site pedestrian improvements including at the North Heath Lane/Parsonage Road/Wimblehurst Road roundabout and Richmond Road/Wimblehurst Road junction. This will allow pedestrians to utilise pathways surrounding the site.</p> <p>The latter two measurements are still under discussion with the council and have not been quantified, however, will add to transport improvements within the area. Overall, the damage cost assessment can be offset with travel voucher alone.</p>
<p>PM 2.5 Targets - Although PM2.5 concentrations were not directly monitored at Park Way in 2023; it is possible to estimate it from the PM10 data using a nationally derived factor. Considering that estimated PM2.5 concentrations are above the PM2.5 interim target of 12<math>\mu\text{g}/\text{m}^3</math> for 2028 at Park Way (HO2), it should have been considered in the air quality assessment.</p>	<p>As discussed with the EPO, the use of PM2.5 derivation from PM10 is not widely used for planning applications across the UK. The method is only used to provide an indication of PM fraction. Therefore, this particulate was not considered within the application at HO2.</p> <p>Additionally, HO2 is located over 1 km from the site, along Park Way which has heavier traffic than the roads surrounding the site. It is also located adjacent to a traffic light junction that would be expected to have slow moving and idling vehicles when lights are red. Concentrations at HO2 are expected to be higher than around the site and therefore were not used in the baseline conditions section of the report.</p>
<p>An Interim Planning Guidance on the consideration of the Environmental Act PM2.5 target in planning decisions was published in October 2024. Applicants are advised to provide evidence in their planning applications that they have identified key sources of</p>	<p>1. The development is located within a disused brownfield with the nearest receptors located to the northeast and other receptors located slightly further afield to the southwest to northerly directions. There were no vulnerable groups noted and population density was regarded as low, surrounding the immediate site boundary.</p>

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<p>air pollution within their schemes and taken appropriate action to minimise emissions of PM2.5 and its precursors as far as is reasonably practicable.</p>	<p>The development has been considered in relation to PM2.5 prior to the application submission. This has included a study of the neighbouring roads and advising on roads to be considered from the transport assessment, which also have fed into the air quality dispersion modelling assessment.</p>
<p>How has exposure to PM2.5 been considered when selecting the development site? Applicants are advised to consider the following in their application:</p>	<p>A dust risk assessment was undertaken in order to understand the dust risk to the neighbouring community during the construction phase, where dust includes PM10 and PM2.5 concentrations.</p>
<ul style="list-style-type: none"> <li>• Site proximity to people (particularly large populations and/or vulnerable groups, e.g. schools, hospitals, care homes, areas of deprivation) and the impact of the development on these,</li> <li>• Site proximity to pollution sources and the impact of these on users of the development,</li> <li>• Exposure and emissions during both construction and in-use.</li> </ul>	<p>A dispersion modelling assessment was undertaken to understand concentrations of PM2.5 during the operational phase, which considered:</p> <ul style="list-style-type: none"> <li>• The impact of the development on the neighbouring community, including cumulative developments;</li> <li>• The impact of the area on the future site users; and</li> <li>• The impact of the existing basement car park under the Former Novartis Site, that is staying as part of the parking strategy for the apartments.</li> </ul>
<p>What actions and/or mitigations have been considered to reduce PM2.5 exposure for development users and nearby receptors (houses, hospitals, schools etc.) and to reduce emissions of PM2.5 and its precursors? Applicants are advised to explain (with evidence where possible) why each measure was implemented. Or, if no mitigation measures have been implemented, why this was not proposed. Actions can refer to, but are not limited to, the following:</p>	<p>2. The dust risk assessment detailed that there is expected to be a medium risk during construction activities and mitigation measures have been prepared based on IAQM guidance.</p>
<ul style="list-style-type: none"> <li>• Site layout,</li> <li>• The development's design,</li> <li>• Technology used in the construction or installed for use in the development,</li> <li>• Construction and future use of the development.</li> </ul>	<p>The construction phase was modelled using ADMS-Roads. It identified that concentrations of PM2.5 are below the air quality objective within the site area.</p>
<p>Additionally, the introduction of new vehicles on the road will not worsen PM2.5 concentrations for the wider area.</p>	<p>As discussed within the meeting, 5,6,7 tubes have been removed from the verification process. Other tube locations were not used as there was no transport data available</p>

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<p>many years, and in 2023 there were 11 air quality monitoring sites in Horsham. Further clarification why only one site was used in the baseline and model verification.</p>	<p>for roads where other suitable diffusion tubes were located. HO2 verification factor of 1.35 has been added to the future scenarios for NO2, as shown in Table 2.</p>
<p>The LAQM Technical Guidance 2022 states that Care needs to be taken when applying model adjustment based on one monitoring site only as the adjustment may not be representative of other locations.</p>	<p>As detailed above, the use of PM2.5 derivation from PM10 is not widely used for planning applications across the UK. The method is only used to provide an indication of the PM fraction.</p>
<p>For the verification and adjustment of NOX/NO2, a combination of continuous monitoring and diffusion tubes is recommended. As described above, some types of sites can perform differently, and it is considered better to have multiple sites at which to verify results rather than just one continuous monitor. The use of one continuous monitor alone to derive the adjustment factor for a model is not recommended as the monitoring site may not be representative of other locations modelled, and the adjustment factor derived will be heavily dependent on the source to receptor relationship as represented by the meteorological data file used in the dispersion model.</p>	<p>As suggested, PM10 has been added to the verification model, however, in our view this does not result in a realistic adjustment factor as the NOX adjustment factor is 1.35 but the resulting PM10 factor is 8.77. This is due to a significant anomaly when comparing the Road- NOX and Road-PM10 values (the measured NOX or PM10 concentration minus the reported background concentration on the Defra background maps). The Road-NOX and Road-PM10 values are 8.87 <math>\mu\text{g}/\text{m}^3</math> and 1.07 <math>\mu\text{g}/\text{m}^3</math> respectively, however, the emission factor in the EfT for NOX for the local road is some eight times higher than that for PM10. It is clearly inconceivable that vehicle emissions are responsible for the observed Road-PM10 contribution. In addition, there cannot be unusual dispersion conditions in this location that lead to a high PM10 adjustment factor as this would also be the case for NOX (which appears to have an adjustment factor within the typical range).</p>
<p>Full statistical analyses to give full picture of the model performance, including (but not limited to): The correlation coefficient, Fractional bias, Root Mean Square Error (RMSE), The statistical analyses should also include model performance for PM10 and PM2.5.</p>	<p>Based on this outcome, in our view it would not be suitable to add a verification factor to the PM10 and PM2.5 concentrations for the future year scenarios. Therefore, the NOX verification factor has been added to all pollutants modelled, as the most representative factor for this project. The updated results using the HO2 NOX verification factor is 1.35. The results are detailed in Tables 3 and 4.</p>
	<p><b>Updated Modelling Results</b></p> <p>Modelled results show that NO2, PM10 and PM2.5 concentrations are below their respective Air Quality Objectives for both future scenarios. Additionally, the scenario</p>

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	<p>with the development in place is expected to have a negligible impact at modelled receptor locations.</p> <p>Please refer to submitted Technical Note for further information in relation to this comment.</p>
Further clarification for why EFT road type rural was applied in the model.	The EFT used 'Urban (not London)' for all roads within the model and all years modelled.
The possibility of cumulative impacts should also be considered to quantify the combined impact at the receptors and assess it against the future baseline. Another future scenario should be modelled, as there is a notable proposed development (DC/25/0415) in close proximity that could contribute to an impact at receptors in combination with the development being assessed.	Cumulative impacts from committed developments have been included in the future year baseline scenario (without development). This also includes phase 3 development flows (although not committed yet) to understand cumulative impacts from the neighbouring development.

#### Public Health and Licencing (Environmental Health) – Noise

Environmental Health responded to the application on 6<sup>th</sup> June 2025. A response is provided on behalf of the applicant by Spectrum (Noise Consultants).

Environmental Health comment (summarised)	Applicant team response
The Officer's recommendation is 'No Objection, Approve with Conditions'	All other comments should be considered in this context.
Various officer comments regarding noise during the construction phase.	All are noted and understood and can be controlled as part of the CEMP. Condition 5 addresses this.
Various officer comments regarding internal noise.	The acoustic report details appropriate glazing treatments.

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<p>The Officer has stated that the need for ventilation and the prevention of overheating must be considered.</p>	<p>With regards to ventilation, Table 6 of the acoustic report sets out the acoustic requirements for glazing and ventilators.</p> <p>This is designed to ensure the internal noise levels set out in BS 8233 are satisfied with windows closed and ventilators open.</p> <p>This approach is advocated in Professional Practice Guidance on Planning and Noise (ProPG) – New Residential Development, ANC/IOA/CIEH, May 2017 which states that <i>“Where it is not possible to meet internal target levels with windows open, internal noise levels can be assessed with windows closed, however any façade openings used to provide whole dwelling ventilation (e.g. trickle ventilators) should be assessed in the “open” position.”</i></p> <p>With regards to overheating mitigation, the Officer advises that overheating risks have not been considered in detail, and should be considered as part of the design.</p> <p>The establishment of overheating risks, and the design of mitigation is covered by the Building Regulations Approved Document O (ADO), and so is not a requirement for planning. The consideration of overheating risk is a matter for specialist overheating designers and is not a requirement for the acoustician. ADO only requires consideration of the noise constraints during overheating mitigation at night and the acoustician can advise on those noise constraints.</p> <p>To assist the designers, the acoustic report sets out the acoustic constraints on the use of open windows during overheating mitigation at night. Section 4.1.2 of the acoustic report, particularly Table 7, gives the extent to which windows can be open whilst also achieving the internal acoustic criteria of ADO. The overheating assessor will then use this information to establish whether additional cooling is required, and this will form part of the Building Regulations submission.</p>
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	<p>I consider suggested Condition 6 unnecessary. If the principle of the condition is to be retained, the wording and criteria will need further consideration and revision as it is currently not necessary, precise or reasonable:</p> <ul style="list-style-type: none"> <li>o Overheating is addressed in ADO, and so the suggested condition is unnecessary and unreasonable;</li> <li>o The Acoustics Ventilation and Overheating Guide referenced does not contain quantifiable standards so is not precise;</li> <li>o The reference to achieving BS 8233 criteria during overheating mitigation contradicts the methodology of Acoustics Ventilation and Overheating Guide and so is not precise or reasonable;</li> </ul> <p>The retention of this condition may require the client to consider overheating mitigation during the daytime period.</p>
<p>Officer comments on noise in external amenity spaces, including that the report has identified some amenity spaces where noise levels exceed guidelines. The officer advises that, in their view, “it is likely this can be overcome through appropriate acoustic boundary treatments”.</p>	<p>Whilst boundary treatments may be able to provide screening, the non-acoustic aspect of any such treatments will need to be carefully considered (such as visual impact).</p> <p>The officer also advises that C07, C10, C11 and C15 balconies may have opportunities to improve the acoustic characteristics through appropriate design and insulation measures. However, I am not aware of any measures that would materially reduce noise levels.</p> <p>The officer identifies that where further mitigation is not feasible, occupiers of these blocks should be provided with access to quieter amenity spaces within the development. As indicated on the noise model in Appendix C of the report, large sections of the central area of the site have noise level within BS 8233 guidelines for amenity space,</p>

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BS 8233 notes that in external amenity areas "...it is also recognized that these guideline values are not achievable in all circumstances where development might be desirable. In higher noise areas, such as city centres or urban areas adjoining the strategic transport network, a compromise between elevated noise levels and other factors, such as the convenience of living in these locations or making efficient use of land resources to ensure development needs can be met, might be warranted."

Therefore, I consider suggested Condition 7 to be unnecessary and unreasonable. The requirements of the condition are more onerous than BS 8233 (which permits noise levels in excess of BS 8233 guidelines in external amenity areas), and there is no guarantee that boundary treatments to achieve the necessary acoustic reductions would be permissible in all non-acoustic regards (such as visual impact). This does not align with the officer's view in the text which allows for access to quieter areas to be available as an alternative, as discussed above. If the principle of the condition is to be retained, then it should be worded to require a submission of boundary treatments to be made, but without the requirement for every garden to meet  $L_{Aeq,16hr}$  55 dB.

In summary, we welcome the overall view that there is no objection to the scheme. The matters of concern raised by the Officer are overheating, which is addressed by the Building Regulations, and noise in gardens where the Officer's intent is met by the scheme as currently designed. As such, Conditions 6 and 7 are not necessary. If the principle of the conditions is considered necessary by the LPA, we will be pleased to work with them to agree suitable precise and reasonable wording.

## Sussex Police

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Sussex Police responded to the application on 28<sup>th</sup> March. A response is provided on behalf of the applicant by Nexus Planning (Planning Agent).

Sussex Police comment (summarised)	Applicant team response
Sussex Police confirm that the proposed development will generate additional incidents. To mitigate this impact and maintain effective policing, a capital contribution is required via a Section 106 agreement.	The HDC case officer has confirmed that the Section 106 capital contribution referenced in the Sussex Police comment does not apply within the district. The LPA will not be seeking this contribution.

#### County Planning Minerals and Waste

County Planning Minerals and Waste responded to the application on 16<sup>th</sup> May 2025, confirming that they offer **no objection**.

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## London Gatwick Airport

London Gatwick Airport responded to the application on 6<sup>th</sup> May 2025. A response is provided on behalf of the applicant by Nexus Planning (Planning Agent) and Greengage (Ecological Consultant).

London Gatwick Airport comment (summarised)	Applicant team response
<p>Gatwick Airport has reviewed the proposed development and confirms there is a potential safeguarding conflict unless specific planning conditions are imposed.</p> <p>Proposed planning condition - Bird Hazard Management Plan</p> <p><i>Submission of a Bird Hazard Management Plan - Development shall not commence until a Bird Hazard Management Plan has been submitted to and approved in writing by the Local Planning Authority. The submitted plan shall include details of:</i></p> <p><i>- Management of the roofs of the apartment blocks which may be attractive to nesting, roosting and "loafing" birds.</i></p> <p><i>The Bird Hazard Management Plan shall be implemented as approved, upon completion of the roofs and shall remain in force for the life of the buildings. No subsequent alterations to the plan are to take place unless first submitted to and approved in writing by the Local Planning Authority.</i></p>	<p>Condition acceptable. Lovell is actively engaging with a specialist consultant, Greengage, to lead the preparation of a Bird Hazard Management Plan.</p>
<p>Proposed planning condition - Landscaping Scheme</p>	<p>The proposed planning condition is considered acceptable.</p>

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*Submission of a Landscaping Scheme - No development shall take place until full details of soft landscaping works have been submitted to and approved in writing by the Local Planning Authority. These details shall include:*

- The species, number and spacing of trees and shrubs*
- Details of any water features*

*No subsequent alterations to the approved landscaping scheme are to take place unless submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented as approved.*

Proposed planning condition - Submission of Details for PV Schemes

*No solar panels shall be installed until full details have been submitted to and approved in writing by the Local Planning Authority.*

*No subsequent alterations to the approved schemes are to take place unless submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented as approved.*

*Reason: To ensure the development does not endanger the safe movement of aircraft or the operation of London Gatwick through interference with communication, navigation and surveillance equipment or flint and glare issues.*

The proposed planning condition is considered acceptable.

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## Waste and Recycling

Waste and Recycling responded to the application on 20<sup>th</sup> May 2025, confirming that they offer **no objection**.

## Horsham District Ecology

Horsham District Ecology team responded to the application on 22 May 2025. A response is provided on behalf of the applicant by Greengage (Ecological Consultant).

Horsham District Ecology comment (summarised)	Applicant team response
<p>We are not satisfied that there is sufficient ecological information on protected species available for determination of this application. We recommend that details of survey results and mitigation measures required to make this proposal acceptable are provided prior to determination.</p>	<p>Please refer to the following documents for additional details of ecological information on protected species <b>including</b> details of survey results and mitigation:</p> <ul style="list-style-type: none"><li>• Ecology – Interim Note</li><li>• Ecology - Falcon Mitigation Strategy</li><li>• Ecology Habitat Management and Monitoring Plan</li><li>• Ecology PRA</li><li>• Ecology PRF</li></ul>

## WSCC Highways

WSCC Highways team responded to the application on 7<sup>th</sup> April 2025. A response is provided on behalf of the applicant by Paul Basham Associates (Transportation Consultant).

WSCC Highways comment (summarised)	Applicant team response
<p>For the purposes of reviewing the current application, the status of the RM applications is quite important inasmuch as whether these could be approved and therefore represent a deliverable fallback; the outstanding RM applications comprise a greater number of dwellings than now proposed, and therefore would result in a greater highway impact compared with the 206 dwellings for which permission is now sought.</p>	<p>There are currently live planning applications in for consideration with HDC, namely planning references DC/23/0183 and DC/23/0171 for Phases 1 and 2 respectively.</p> <p>Despite the position of the live planning applications, we would like to reiterate that there was an outline application for the site for up to 300no. dwellings (on this Lovell part of the site) and other uses, which, although permission lapsed in February 2025,</p>

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It would be helpful if the status of the RM applications (i.e. and whether these have a possibility of being approved) could be clarified in light of the above context.

was granted consent and was forecast to have a greater impact on the local and wider road network (as detailed within the original TA) than this revised and lesser volume planning application seeks.

In reviewing the Transport Assessment (TA) and the Travel Plan (TP), it's noted no reference seems to be given to the site adopting a 'vision-led' approach. Given 'vision-led' transport planning is specifically referenced in the National Planning Policy Framework, this is somewhat disappointing.

It is understood that there has been a move away from the traditional 'predict and provide' approach, shifting to a 'vision-led' approach in line with national planning policy and Net Zero targets. This shift is supported by the revised National Planning Policy Framework (Dec 2024). The vision-led approach rather than a forecast-led (predict and provide) is a way of predicting the future trips for a proposed development. It has a strong focus on the shift to sustainable transport modes and looks at providing for the best-case in terms of modal shift, rather than planning for the worst-case.

The opportunities to adopt a vision led approach have been explored, and although enhancing local bus stops was not considered necessary, the proposed improvements to the local pedestrian and cycle infrastructure and proposed Travel Plan implementation and measures would help create a more sustainable development (somewhat aligning with the vision led approach) and in turn would help reduce vehicle trips.

Given that an application had been approved on the site in February 2020 for "Outline planning application for the erection of up to 300 dwellings (C3) including the conversion of existing offices buildings 3 and 36) up to 25,000sqm of employment (B1) floorspaces and provision of 618sqm of flexible commercial/community space (A1 A2 A3 D1 Creche) use classes) etc (planning reference: DC/18/2687), it was considered that a comparison between the previously consented scheme and the proposed scheme would provide a more suitable and robust way in determining the impact of the proposed scheme on the local and wider network. For this to occur, similar methodologies in terms of traffic impact assessment were considered to be the best way forwards. Such approach would allow for a logical and proportional comparison in

	<p>the traffic impacts of up to 300 dwellings against the revised proposals for 206 dwellings.</p> <p>The comments received from WSCC agreed that the TA considered the worst-case scenario for the highway impact generated by the development, with their comments stating 'WSCC recognise that this development will generate additional traffic onto the local network, which in turn will worsen existing issues. The modelling is considered representative of a worst case given that no 'vision' based scenario with inherent increased share by sustainable modes (and therefore reduced vehicle trip generation) is included. It's also noted that the development worsens but is not the sole cause of capacity issues. As stated already, the NPPF sets a high bar whereby development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network, following mitigation, would be severe taking into account all reasonable future scenarios. WSCC do not consider that this development will result in severe or otherwise unacceptable impacts.'</p> <p>Therefore, whilst it is acknowledged that a typical 'vision-led' approach hasn't necessarily been presented through this application (with good reason and to allow direct comparison with the consent which lapsed in February 2025), the impacts of the development are not considered severe in the context of the NPPF, even with the worst-case assessments undertaken.</p>
<p>The details submitted also indicate the provision of a 'Copenhagen' crossing.</p> <p>Whilst WSCC Highway accept the principle of this arrangement, there are concerns with the details as presented. Although WSCC do not have any formal guidance on the design of 'Copenhagen' crossings, that guidance that is available indicates a need to reduce vehicle approach and turning speeds, and that the crossing distance is kept to a minimum. The layout presented is at odds with this with there being a significant</p>	<p>As set out within the TA, it was proposed that a 'Copenhagen Crossing' be provided across the site access for this part of the development site. This was due to the fact that the design works would reduce the existing distance for pedestrians to travel across the access by revising the existing northern kerbline (and in turn enhance pedestrian priority with a vision-led approach). The comments raised however are noted and have thus access has been re-considered and the 'Copenhagen Crossing' element of the design would be removed. This is primarily a result of internal layout restrictions permitting the</p>

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<p>crossing distance and large kerb radii. The crossing should also be placed upon a raised table to further reduce vehicle speeds. It's unclear if this is the case.</p> <p>The arrangement also includes a partial as opposed to full setback of the give way lines. This would result in those vehicles entering stopping partly on Wimblehurst Road whilst pedestrians cross. The use of a partial setback in this instance is not considered appropriate given the level of traffic using Wimblehurst Road.</p>	<p>crossing to relocate further into the site without having an impact on plots and associated car parking, and thus the WSCC comment in regard to vehicles potentially obstructing Wimblehurst Road traffic would not be overcome.</p> <p>The pedestrian infrastructure and walking route will be enhanced compared to the existing arrangement in any case given the reduction in width to travel, and the proposed arrangement will also include dropped kerbs and tactile paving which will still support the movement of both visually and mobility impaired users. The revised access design is included in Appendix B of the ATA.</p>
<p>A 'Copenhagen' crossing is also shown at the Wimblehurst Road/Richmond Road junction. Some of the concerns stated above for the site access junction would be applicable for this too. The design of both 'Copenhagen' crossings should be reviewed.</p>	<p>It was proposed in the original TA that the Wimblehurst Road/Richmond Road junction would also comprise a 'Copenhagen Crossing' to maintain a 'pedestrian priority'. However, given the comments raised by WSCC in relation to the site access and that the design has been revised to remove the crossing, proposing one at the Wimblehurst Road/Richmond Road junction would mean that it is provided in isolation and would likely lead to confusion for pedestrians and drivers alike. With consideration to the comments made for the site access, and specifically that vehicles would obstruct Wimblehurst Road whilst awaiting pedestrians to cross, this 'Copenhagen Crossing' is also now proposed to be removed. The junction would however still be improved with the addition of tactile paving to encourage mobility and visually impaired users to cross the junction.</p> <p>Given the removal of the 'Copenhagen Crossing' at the Wimblehurst Road/Richmond Road junction, a safety audit has not been undertaken and thus addresses any comment in this regard within the WSCC highway comments.</p>
<p>The Site Plan indicates a number of pedestrian accesses onto Parsonage Road. There are no particular issues with these given they join the existing footway. It's recognised that pedestrians and cyclists can also enter and exit the development via DC/25/0415.</p>	<p>Noted and agreed that the movement of pedestrians and cyclists through the adjacent development can be secured via condition, and that physical obstructions for typical</p>

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<p>A means of preventing vehicular access (with the exception of emergency vehicles) between the two developments would need to be secured by condition.</p>	<p>vehicles (but still facilitating emergency vehicles) would be provided, such as in the form of bollards.</p>
<p>The TA provides a relatively high-level assessment of walking routes in the general area with several junctions identified where tactile paving is missing. The Applicant is offering to fund the installation of tactile paving at these locations. Given the relatively low cost of these improvements, WSCC see no reason why these could not be undertaken by the Applicant.</p>	<p>This is noted and agreed, and the client is willing to fund the delivery of the tactile paving as required, or a proportionate contribution should both applications being considered in this location (planning references: DC/25/0629 and DC/25/0415) be approved.</p>
<p>With cycling, the assessment is also high-level. Point 3.21 of the TA makes reference to the gentle topography and wide carriageways within the local area making cycling attractive. There is though no mention of any consideration being given against LTN 1/20 or that the majority of carriageways in the local area are very well trafficked making on-carriageway cycling unfeasible for some users.</p>	<p>This has been noted and LTN 1/20 guidance has been reviewed. Although a new Automated Traffic Count (ATC) survey was not undertaken to support the proposed development, given that visibility was shown to the Wimblehurst Road/North Heath Lane/Parsonage Road roundabout to the north and to accord with 43mph to the south, it is considered that (due to the flows calculated during turning count surveys locally), Wimblehurst Road would fall within the 30mph, 6000+ Motor Traffic Flow, Mixed Traffic section of the table demonstrated in Figure 1 of the ATA</p> <p>With the above in mind, whilst it is acknowledged that some people could be deterred from cycling given the conditions along Wimblehurst Road, LTN1/20 is guidance, and some people will use the carriageway regardless.</p> <p>A review of the collision data along Wimblehurst Road and routes into the town centre have also been undertaken to identify any particular road/route that could pose a concern for future cyclists. The data shown in Figure 2 is from the Department for Transport Mapping Application for Visualising Road Injury Casualties (MAVRIC) and has been set for 1st January 2019 to the latest available date (31st December 2023) timeframe. The casualty type has been set to pedal cyclists.</p> <p>Although any incident is regrettable, the data presented in Figure 2 demonstrates that there have only been 2no. recorded incidents involving cyclists along Wimblehurst</p>

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	<p>Road, none along Parsonage Road (which benefits from advisory on-street road marking) or Hurst Road and only 1no. along Foundry Lane.</p> <p>It is of course appreciated that a couple of incidents have been recorded at local junctions, however, the number of incidents in comparison to the amount of time reviewed is minimal.</p> <p>It is therefore acknowledged that some residents may not be encouraged to cycle on the surrounding roads, but others will remain undeterred. It is noted that Wimblehurst Road doesn't currently demonstrate that cyclists ride within the carriageway, and therefore the development could implement advisory on carriageway markings (similar to Parsonage Road) if WSCC deem it necessary. It is also worth reiterating that a scheme for a higher quantum of housing in this location was previously approved, that would likely have generated more cyclists than the proposed scheme.</p>
<p>Again with cycling, the Horsham LCWIP identifies routes to the immediate east (Kings Road/North Street) and west (along Wimblehurst Road/North Heath Lane). In the circumstances, the provision of a route from the development site into one of these more strategic cycling corridors seems appropriate and would only benefit future residents; this could form an obligation on the development. It's noted that the location of these LCWIP schemes is mentioned in the Travel Plan but not the TA.</p>	<p>To further improve the cycling infrastructure within Horsham, the Horsham LCWIP proposes a series of strategic cycle corridors to facilitate increased cycling in the local area. The proposed cycling corridors are outlined in <a href="#">Figure 3 of the ATA</a>.</p> <p>The location of the site in relation to the routes along Kings Road/North Street and particularly that along Wimblehurst Road/North Heath Lane would mean that future site users would benefit from these improvements. Any CIL monies collected from the development could be used to implement the LCWIP schemes, but as aforementioned, the development could also fund advisory on carriageway markings along Wimblehurst Road, as it was observed that these are not currently provided.</p>
<p>WSCC also recognise that the proposed residential development will be liable for CIL; this was not the case for the previous employment uses. Any CIL monies collected could be put towards the development and implementation of LCWIP schemes.</p>	<p>As aforementioned the site is well located to two of the LCWIP routes (along Kings Road/North Street and along Wimblehurst Road/North Heath Lane) and therefore, the client is willing to fund proportionate and fair improvements (either through CIL</p>

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	<p>payments or S106) if required, with consideration to the proposed quantum of units and location of the site.</p>
<p>With regards to local bus stop improvements, the previously secured contribution was to provide real time information. This appears to have been installed already. As such, WSCC would not request specific funding towards nearby bus stops. This would not preclude the Applicant however assessing and improving walking routes to these bus stops.</p>	<p>This comment is noted and as identified within the TA, the client is willing to contribute to improving the walking infrastructure in the vicinity of the site and in turn the routes to the local bus stops.</p> <p>It should be noted that the comments received through the adjacent application (planning reference: DC/25/0415) stated concerns over the proposals to place the Wimblehurst Road/Parsonage Road/North Heath Lane roundabout on a raised table due to the use by buses. Whilst this comment hasn't specifically been raised within the response supporting this application (DC/25/0629), we would like to make it clear that the raised table element has been removed, but improvements are proposed in terms of the existing crossing islands. The revised/proposed scheme at this roundabout is demonstrated in Appendix C.</p>
<p>The proposed car club space and vehicle is also noted. This should be secured as part of the s106 agreement. The obligation should cover an agreement over the location of the car club vehicle, the trigger for its provision, and the duration for which the Applicant will fund its provision.</p>	<p>With consideration to this comment, we reiterate that the car club space(s) are being proposed within the adjacent application (for the Muse parcel of the wider site) and therefore, are for consideration through planning application DC/25/0415.</p> <p>Further details on the car club space(s) are therefore not provided within this response, but should both applications be granted approval, the residents of this site would be able to utilise the spaces in the future, further enhancing the sustainable opportunities of the site.</p>
<p>B2237 North Parade/Wimblehurst Road junction – Similar to the previous junction, the modelling is showing an existing issue that progressively worsens across the AM and PM peaks with the proposed development. In viewing the outputs, WSCC fully recognise the potential for increased queues and delays with the development. However, the NPPF is</p>	<p>It is noted that WSCC stated that the final scheme of improvements is currently unknown for the B2237 North Parade/Wimblehurst Road Signalised Junction, but that an older version of MOVA is currently being used. A mitigation/improvement would be to upgrade the MOVA software, for which WSCC have identified a cost of circa £6K. The</p>

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<p>quite clear in terms of the test that is to be applied (i.e. unacceptable safety or severe impacts). It's not considered that either of these tests would be met in this instance.</p> <p>As previously identified, there is a potential upgrade that could be made to the software controlling the traffic signals (known as MOVA). This is a low-cost upgrade (£6k) that could benefit the overall performance of this junction.</p>	<p>proposed development could fund this improvement (or a proportionate contribution towards should the application for the Muse site to the east (planning reference: DC/25/0415) also be granted planning permission) to help alleviate traffic issues. WSCC have stated within their response that 'the NPPF sets a high bar whereby development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network, following mitigation, would be severe taking into account all reasonable future scenarios. WSCC do not consider that this development will result in severe or otherwise unacceptable impacts'.</p>
<p>With cycling, the assessment is also high-level. Point 3.21 of the TA makes reference to the gentle topography and wide carriageways within the local area making cycling attractive. There is though no mention of any consideration being given against LTN 1/20 or that the majority of carriageways in the local area are very well trafficked making on-carriageway cycling unfeasible for some users.</p>	<p>This has been noted and LTN 1/20 guidance has been reviewed. Although a new Automated Traffic Count (ATC) survey was not undertaken to support the proposed development, given that visibility was shown to the Wimblehurst Road/North Heath Lane/Parsonage Road roundabout to the north and to accord with 43mph to the south, it is considered that (due to the flows calculated during turning count surveys locally), Wimblehurst Road would fall within the 30mph, 6000+ Motor Traffic Flow, Mixed Traffic section of the table demonstrated in Figure 1 of the ATA</p> <p>With the above in mind, whilst it is acknowledged that some people could be deterred from cycling given the conditions along Wimblehurst Road, LTN1/20 is guidance, and some people will use the carriageway regardless.</p> <p>A review of the collision data along Wimblehurst Road and routes into the town centre have also been undertaken to identify any particular road/route that could pose a concern for future cyclists. The data shown in Figure 2 is from the Department for Transport Mapping Application for Visualising Road Injury Casualties (MAVRIC) and has been set for 1st January 2019 to the latest available date (31st December 2023) timeframe. The casualty type has been set to pedal cyclists.</p>

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	<p>Although any incident is regrettable, the data presented in Figure 2 demonstrates that there have only been 2no. recorded incidents involving cyclists along Wimblehurst Road, none along Parsonage Road</p> <p>(which benefits from advisory on-street road marking) or Hurst Road and only 1no. along Foundry Lane.</p> <p>It is of course appreciated that a couple of incidents have been recorded at local junctions, however, the number of incidents in comparison to the amount of time reviewed is minimal.</p> <p>It is therefore acknowledged that some residents may not be encouraged to cycle on the surrounding roads, but others will remain undeterred. It is noted that Wimblehurst Road doesn't currently demonstrate that cyclists ride within the carriageway, and therefore the development could implement advisory on carriageway markings (similar to Parsonage Road) if WSCC deem it necessary. It is also worth reiterating that a scheme for a higher quantum of housing in this location was previously approved, that would likely have generated more cyclists than the proposed scheme.</p>
<p>Again with cycling, the Horsham LCWIP identifies routes to the immediate east (Kings Road/North Street) and west (along Wimblehurst Road/North Heath Lane). In the circumstances, the provision of a route from the development site into one of these more strategic cycling corridors seems appropriate and would only benefit future residents; this could form an obligation on the development. It's noted that the location of these LCWIP schemes is mentioned in the Travel Plan but not the TA.</p>	<p>To further improve the cycling infrastructure within Horsham, the Horsham LCWIP proposes a series of strategic cycle corridors to facilitate increased cycling in the local area. The proposed cycling corridors are outlined in Figure 3 of the ATA.</p> <p>The location of the site in relation to the routes along Kings Road/North Street and particularly that along Wimblehurst Road/North Heath Lane would mean that future site users would benefit from these improvements.</p> <p>Any CIL monies collected from the development could be used to implement the LCWIP schemes, but as aforementioned, the development could also fund advisory on</p>

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	carriageway markings along Wimblehurst Road, as it was observed that these are not currently provided.
WSCC also recognise that the proposed residential development will be liable for CIL; this was not the case for the previous employment uses. Any CIL monies collected could be put towards the development and implementation of LCWIP schemes.	As aforementioned the site is well located to two of the LCWIP routes (along Kings Road/North Street and along Wimblehurst Road/North Heath Lane) and therefore, the client is willing to fund proportionate and fair improvements (either through CIL payments or S106) if required, with consideration to the proposed quantum of units and location of the site.
With regards to local bus stop improvements, the previously secured contribution was to provide real time information. This appears to have been installed already. As such, WSCC would not request specific funding towards nearby bus stops. This would not preclude the Applicant however assessing and improving walking routes to these bus stops.	<p>This comment is noted and as identified within the TA, the client is willing to contribute to improving the walking infrastructure in the vicinity of the site and in turn the routes to the local bus stops.</p> <p>It should be noted that the comments received through the adjacent application (planning reference: DC/25/0415) stated concerns over the proposals to place the Wimblehurst Road/Parsonage Road/North Heath Lane roundabout on a raised table due to the use by buses. Whilst this comment hasn't specifically been raised within the response supporting this application (DC/25/0629), we would like to make it clear that the raised table element has been removed, but improvements are proposed in terms of the existing crossing islands. The revised/proposed scheme at this roundabout is demonstrated in Appendix C of the ATA.</p>
The layout also includes a number of quite long access roads with no turning heads. The issue is whether reversing distances would be overly long and therefore exceed standard requirements. The Local Planning Authority should seek the views of the waste collection authority.	<p>This is noted and we await formal response from HDC waste collection teams. The tracking undertaken to support the application demonstrates the locations within which the refuse vehicle can safely turn.</p> <p>Where there is no turning areas provided directly adjacent to some properties, the maximum 12m reverse distances are shown on the tracking drawing to indicate how close the vehicle can get to all the properties and bin storage points.</p>

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<p>There does need to be some consideration given to ensure continuous pedestrian walking routes between this and the adjoining development. As shown, some of the pedestrian routes from this site would land within car parking spaces or dropped kerbs.</p>	<p>This is noted and the exact locations of footways and tie in for each site will be given at the detailed design stages. However, it is worth reiterating that the Muse site will provide a 2m wide footway on the western side of their access road which will connect to the two connections proposed through from this Lovell site, with the footway connection provided on at least one side of the Lovell carriageways in these locations.</p>
<p>The means of preventing vehicle access between this and the adjoining development will need to be secured by condition. Such measures will need to deter vehicle access but must still allow access for cyclists.</p>	<p>This is noted and is agreed as aforementioned in Section 2 of the ATA.</p>
<p>The proposed off-site improvement works, and the related contributions, were noted by WSCC and Stantec in their comments. It is noted that the WSCC highway comments state 'With regards to offsite improvement works, it will be necessary for the Applicants (of both this application and that under reference: DC/25/0415) to identify all works jointly necessary and how these will be subsequently delivered. A note covering both schemes should be provided'.</p>	<p>It is proposed that the costs associated with the off-site works are shared between the developers of each site, Lovell and Muse (assuming both applications are granted approval). It is envisaged that discussions between Lovell, Muse, WSCC and HDC will take place to agree how much each developer will contribute to the proposed off-site improvement works (presuming a proportional split based on the respective development quantum). If one of the proposed development sites comes forward without the other, the off-site improvements are still proposed and in this scenario the developer of the land which is approved would cover the full cost for the proposed improvements</p>

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## WSCC Highways (Stantec)

WSCC Highways (Stantec) team responded to the application on 6<sup>th</sup> June 2025. A response is provided on behalf of the applicant by Paul Basham Associates (Transportation Consultant).

WSCC Highways (Stantec) comment (summarised)	Applicant team response
<p>Stantec draw attention to the formation of the scenarios. It may be appropriate to include all of the site ('Muse' and 'Lovell' portions) into the with-development scenario rather than having the 'Muse' portion of the site as part of Committed Development. The approach undertaken in the TA may be underestimating highways impact</p>	<p>The approach undertaken in the TA to include the Muse site as 'committed development' was down to the fact that these are standalone applications and in theory, one site could be granted planning approval, but the other site might not. Although planning permission hasn't been granted, at the time of writing, the Muse site has been considered as 'committed development' to assess for a worst-case scenario for the junction capacity assessments but acknowledged this could also be referenced as a 'sensitivity test'. This has been accepted by WSCC highways as a sensible approach.</p> <p>Due to the access locations and the location of the level crossing (circa 170m east of the proposed site access to the Muse parcel on Parsonage Road), the anticipated routes for development traffic differs slightly between the two sites, and therefore the percentage of traffic through each junction generated by each site also differs.</p> <p>Ultimately, the '2031 Future Year + Committed Development + Proposed Development' modelling scenario factors in the anticipated highway impact of both the Lovell and Muse portions and therefore is not considered to underestimate the highways impact. Discussions with Stantec and HDC have taken place regarding this comment.</p>
<p>Basement Parking is also part of the parking mix (77 spaces). Whilst Basement Parking is appropriate, the constrained nature of a basement should be fully considered. If spaces are too tight to ensure regular use, even if the spaces are theoretically of sufficient sized, commentary should be made that the parking provision on the site is</p>	<p>As demonstrated in the original TA, a total of 249no. car parking spaces are required to serve the site, but a total of 252no. spaces are being provided, thus an additional 3no. spaces compared to the requirements.</p>

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robust to ensure no overflow into remainder of site or onto the external highway network. The 77 spaces is approximately one-third of the total parking

The car parking spaces provided within the basement measure 2.4m x 4.8m, with 6m aisle widths provided where appropriate, which ensures that the space dimensions accord with the standards.

Across the basement, there are spaces which have structural elements such as pillars adjacent to them, and in most instances, there is additional width circa 100 – 200mm on at least one side of the space prior to the pillar. It is acknowledged that some spaces do have pillars on the boundaries of the spaces which border other spaces and as such, the width of the space is restricted a little. However, as shown on the tracking drawing submitted with the TA, where this does occur, the available width is still greater than that of a 'typical' car (see Figure 4 of the ATA).

Therefore, given that the site is 'overproviding' on spaces in relation to the standards, and that the car parking tracking within the basement shows the spaces are suitable, it is not considered that the basement is providing a constrained nature.

## Landscape Architecture

Landscape Architecture team responded to the application on 13th May 2025. A response is provided on behalf of the applicant by Fabrik (Landscape Architect).

Landscape Architecture comment (summarised)	Applicant team response
At outline stage, it was advised that the verdant character of Parsonage Rd, as an important feature within the area, must be retained. The potential loss of the mature trees on the northeastern boundary, including the loss of trees within the site, will therefore have an adverse effect on the local landscape character. While these trees are shown for retention outside of residential curtilage, concern is raised in regard to the	Detailed plans to show how the walls/ boundary treatments are constructed will follow at the detailed stage, working alongside the Arborist who will produce a methodology analysis/ update to AIA

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<p>current layout proposed. Please seek the advice of HDC's Arboriculturalist in regard to the introduction of hardstanding including brick walls and cycle storage, as well as the relationship with future occupants of plot C02.</p>	
<p>We request the submission of a tree survey that includes the root protection areas (RPAs) in order to understand the impact of the proposals on existing trees.</p>	<p>Included within Arboricultural Implications Assessment (AIA).</p>
<p>The site and block plan show the trees along Parsonage Road within the residential curtilage. While it's acknowledged that this is not the case within the Landscape General Arrangement (LGA), we request the plans are amended to be consistent with the LGA as this may cause issues later on with title deeds</p>	<p>Noted, this has been updated.</p>
<p>Please include cycle storage in plots C02b &amp; C03a in the LGA to be consistent with other plans. Cycle storage for visitors, as proposed within the Design and Access Statement (DAS), is missing from the LGA. Please confirm if no longer proposed or reinstate accordingly.</p>	<p>Noted. To be picked up at the next design stage with detailed hard and soft general arrangement plans (picked up on hard landscape general arrangement plan).</p>
<p>The retention of trees cannot be secured within private amenity space. Please relocate the trees in plots C24-26 outside of the residential curtilage, within the 'Ecology Edge' as specified within the DAS.</p>	<p>Noted. To be picked up at the next design stage</p>
<p>The avenue of <i>Metasequoia glyptostroboides</i> is welcomed, however more instant impact is requested. Please amend to a minimum size of 20-25cm girth, though larger sizes such as 30-35cm would be preferred</p>	<p>Noted. To be picked up at the next design stage</p>
<p>While the locations of root barriers are welcomed, we note that some appear to be absent and should be added to the LGA for completeness. Please see examples highlighted in yellow, below, where trees are in proximity to service runs.</p>	<p>Noted. To be picked up at the next design stage alongside the detailed planting plans and next stage coordination.</p>

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Request for land budget plan.	Land budget plan has been supplied (ref D3438-FAB-00-XX-DR-L-9000)
Please confirm if any changes are proposed to the boundary alongside Parsonage Rd or if the existing estate railing will remain in situ	To be replaced. To be considered at the next design stage
Please provide quantities to the plant schedule. Densities are also recommended to be reviewed, particularly in regard to formal topiary and hedge planting	This will be detailed up at the next detailed design stage in the form of detailed planting plans.
Please indicate areas for herbaceous planting, ornamental grasses, ferns and bulbs in the LGA	This will be detailed up at the next detailed design stage in the form of detailed planting plans.
The LGA should differentiate between native shrub planting and ornamental shrub planting, keeping in mind that areas abutting the 'Ecology Edge' should ideally reflect native species	This will be detailed up at the next detailed design stage in the form of detailed planting plans.
Please label species for single species hedgerow and specify between native and ornamental hedgerow within the LGA. As above, this is particularly relevant when close to the 'Ecology Edge'	This will be detailed up at the next detailed design stage in the form of detailed planting plans.
As such, the hedgerows on the southwestern boundary are requested to be amended to native hedge planting	This will be detailed up at the next detailed design stage in the form of detailed planting plans.
Crocosmia crocosmifolia is listed on Schedule 9 of the Wildlife and Countryside Act in England and Wales and therefore should not be included within proposals. Please	These will be omitted and detailed up at the next detailed design stage in the form of detailed planting plans.

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consider an alternative suited to rain garden conditions, such as Veronicastrum virginicum or Aquilegia canadensis

### Property and Economic Development

The Property and Economic Development team responded to the application on 19th May 2025. A response is provided on behalf of the applicant by Vail Williams (Economic Consultants).

Property and Economic Development comment (summarised)	Applicant team response
Current shortage of modern, fit-for-purpose commercial premises across the District Impact of the shortage on businesses	The site has been extensively marketed, but that has not established a suitable occupier for the site. The submitted Employment and Marketing Report details the efforts that have been made to find an employment occupier, and the fact that an employment use at this site is not viable or deliverable.
The proposal undermines the economic objectives set out in the Local Plan.	The proposals comply with the adopted Local Plan for the reasons set out in the submitted Planning Statement. It has been evidenced that an employment scheme at this site is not viable, and extensive marketing has not brought forward a suitable occupier for it.  The Council's emerging Local Plan is in a state of uncertainty given the Inspector's findings on it. In any event, the submitted Planning Statement addresses that the Council's evidence base shows that there is sufficient employment land within the District for the quantum of housing development that the Local Plan is promoting.

### Horsham District Council Planning Department

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HDC Planning team responded to the application on 13th May 2025. A response is provided on behalf of the applicant by Vail Williams (Economic Consultants) and Nexus Planning (Planning Agent).

Horsham District Council Planning Department comment (summarised)	Applicant team response
Commentary surrounding the planning policy background .	<p>Section 38 (6) of the Planning &amp; Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise.</p> <p>The adopted Development Plan for Horsham currently comprises the Horsham District Planning Framework (2015); and the Horsham District Planning Framework Policies Map (2015).</p> <p>The HDPF is over five years old and does not reflect the most current housing needs of the district, so it is considered to carry less weight in the decision-making process.</p> <p>Horsham District Council (HDC) has submitted a draft Local Plan to the Secretary of State for examination. Hearing sessions began in December 2024 but were then paused at the request of the Inspector. On 16th December 2024, HDC received a letter from the Planning Inspectorate which indicated significant concerns regarding the soundness and legal compliance of the Plan. As such, it is not currently clear when a new Plan for Horsham will be adopted.</p>
The principle of development and the HDC 5YHLS position	<p>The principle of residential development at the wider Former Novartis site has been established by the approval of an outline planning application. The Site is previously developed land, in a sustainable location within the built-up area of Horsham town. The principle of development at this location is therefore strongly established.</p> <p>As of April 2023, the Council's Authority Monitoring Report 2022/23 (published January 2024) identified that HDC could demonstrate a housing land supply of 2.9 years (against the necessary 5-year requirement). This remains the most recent and up to date AMR.</p>

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	<p>This means that the 'presumption in favour of sustainable development' applies as set out in paragraph 11 of the NPPF.</p> <p>Alongside the AMR, sits the Housing Delivery Test – the most recent results of which were published in December 2024, covering the period 2020/21, 2021/22 and 2022/23. HDC scored 62% delivery against national housing targets – this means that the 'presumption in favour of sustainable development' applies when planning applications for housing are considered as set out in paragraph 11 of the NPPF. It also means that when calculating the five year housing supply for the Council a 20% buffer must be added to the overall five-year housing target, an Action Plan must be prepared, setting out how HDC will seek to ensure the delivery of new homes.</p> <p>In this context, we would anticipate the principle of all types of housing at the Site to be strongly supported in principle.</p>
Conflict with Policy 2 and 8 seeking employment use on the site. Weight to be attributed to conflict with the development plan.	<p>The Planning Policy comments note a conflict with policies 2 and 8 of HDPF, primarily given employment uses are not proposed as part of the application.</p> <p>As noted, the HDPF carries less weight in the decision-making process due to its age and the fact that it does not reflect latest housing need.</p> <p>The HDPF, in Policy 2, identifies that as part of the spatial strategy to 2031 for the district, a strategic mixed used opportunity at the former Novartis site should include employment, education and specialist housing. It also encourages effective use of previously developed land.</p> <p>The HDPF allocates the site under Policy 8 for a mixed-use quarter, stating that the site is allocated for 're-use as comprehensive, mixed use strategic development for a higher education facility including supporting facilities, complementary employment uses and associated infrastructure'. Policy 8 does however also state that 'If the site is not developed for a higher education use by 2021 the future redevelopment of the site can</p>

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	<p>be provided by other uses in a sequential test with a combined training and employment use first and employment use solely secondly'.</p> <p>The Local Planning Authority took the view when determining the Outline planning permission that the employment element of the scheme met the requirements of that policy. The Policy does not say that should neither a 'training and employment' use, or a solely employment use be deliverable at the site, that this should be the end of the sequential approach to uses at the site. The process of considering alternative uses sequentially should continue, to include other types of uses, including residential.</p> <p>There has been no subsequent interest in taking the site forward in an education use since the original prospective tenant withdrew interest before 2020. It is therefore appropriate, that alternative, non-education uses are pursued for the site (as was the case with the 2020 outline permission which proposed employment floorspace alongside residential development). This is advocated by both the sequential approach advocated by Policy 8, and paragraph 127 of the 2024 Framework.</p> <p>The planning application is supported by a comprehensive analysis of local need and viability for an employment use at the site by Vail Williams, who are local experts on the matter.</p> <p>This demonstrates that the site has been extensively marketed over a long period of time (far longer than the year required by emerging Policy 30) for offices. No meaningful interest has been forthcoming despite substantial efforts. The likely reasons for this are considered by Vail Williams, in the report submitted as part of the planning application and furthermore in the below sections of this response.</p>
Weight to be attributed to other factors.	As described in detail throughout the submitted planning statement, the scheme meets the requirements of the development plan, and so should be granted planning consent without delay.

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	<p>It is the applicant's view that in the determination of the application, varying degrees of weight should be attached to a range of other planning policy factors which need to be considered. These factors represent material considerations, and they weigh in favour of the proposal being granted.</p> <p><u>The length of time that the site has been vacant</u></p> <p>The site had been in use as the headquarters of Novartis (formerly CIBA United Kingdom Limited) since the 1930s, however operations ceased in June 2014 and the site has remained vacant since this time. It is the applicant's view that significant weight should be attributed to the value in bringing this sustainable located, vacant, brownfield site, back into use – particularly in the context of an acute shortage of homes in the district and a local and national policy context strongly requiring the delivery of new homes of all types and tenures.</p> <p><u>The commitment to deliver at least policy compliant affordable housing</u></p> <p>There is a commitment to deliver 35% policy-compliant affordable housing units. It is the applicant's view that this should be attributed significant weight.</p> <p><u>Delivery of Ecological Enhancements including Biodiversity Net Gain</u></p> <p>The is a commitment to deliver a 10% biodiversity net gain as required by the 2021 Environment Act. The approach to the delivery of BNG is detailed in the planning submission and should be attributed significant weight.</p>
The marketing audit and feasibility assessment does not really address why lower cost buildings with lower rents, constructed in phases if necessary, could not be delivered.	<p>An Addendum Marketing Report, Audit and Land Employment Viability Assessment has been prepared by Vail Williams.</p> <p>In this addendum report, Vail Williams identify that Section 9.16 to 9.20 of the original submitted report directly addresses the potential for 'starter' and 'micro' industrial units</p>

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	<p>under 3,000 sq ft. While latent demand is accepted in principle, the report clearly explains why such development is not commercially viable under prevailing conditions:</p> <ul style="list-style-type: none"> <li>• Higher Build Costs: Small units are disproportionately expensive to build, with costs per sq ft estimated to be significantly higher than larger format units due to reduced efficiencies and increased material and servicing requirements.</li> <li>• Weaker Tenant Covenants: Micro-businesses typically carry higher insolvency risk, which leads to less attractive investment returns and exit yields above 8%, compared to 6-6.5% for institutional tenants.</li> <li>• Lower Investment Appetite: The cumulative effect of weak covenants and higher yields suppresses achievable capital values, discouraging investor and funding interest.</li> <li>• Market Precedent: Glenmore Business Park in Worthing is cited as a recent example where completed micro units struggled to let or sell, further evidencing lack of viability.</li> </ul> <p>Additional evidence to illustrate the above in the form of a bespoke appraisal is provided in the addendum report.</p>
Validity and robustness of the submitted marketing and viability evidence.	The Vail Williams Addendum Marketing Report, Audit and Land Employment Viability Assessment includes additional detail on the marketing approach which was undertaken. It is the Applicant's firm position that the material that has been provided on marketing and viability at the site is very robust and should be relied upon as an accurate picture of the lack of opportunity to bring forward a deliverable employment use at the site.

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## Horsham District Council Housing Department

The HDC Housing Department responded to the application on 19<sup>th</sup> June 2025. A response is provided on behalf of the applicant by ...

Horsham District Council Housing Department comment (summarised)	Applicant team response
Housing Officers would urge the applicant to reach an agreement with a provider as soon as possible to clarify and confirm tenure split and secure funding arrangements for the affordable homes and ensure the layout and specifications of the affordable units meet the provider's requirements. Housing Officers need reassurance that there are registered providers who would be willing to take on the site and tenure sizes as proposed before we would be able to support the site.	The Applicant is open to more detailed discussions with the Housing Team as to the mix of affordable homes proposed / secured via the legal agreement.
10 of the units on the site would be wheelchair access but not if these would be made available to the affordable housing. About 30% of households on the councils housing waiting list require adaptions to a property. Housing Officers would encourage developers to consider this and to speak with affordable housing providers as soon as possible to clarify delivery of this need	Noted.

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## Horsham District Council Design and Conservation

The HDC Design and Conservation responded to the application on 12 May 2025. A response is provided on behalf of the applicant by ACG.

Horsham District Council Design and Conservation comment (summarised)	Applicant team response
<p>I am satisfied the revised proposal will preserve the interest of the historic building and ensure it is conserved for the future. Although the avenue of Blue Atlas Cedar trees forms a large part of the setting for Building 3, in heritage terms it is the position of the trees and their creation of a line of sight that is important. I would not object to their replacement with a more appropriate species that will provide the scale and grandeur of the existing trees.</p> <p>My only criticism is the design for the replacement gate house buildings. I would like to see a greater sense of arrival through increased architectural interest of these two buildings. I think they should be truly landmark buildings that make a statement as you enter the site. I am happy to discuss this with the architects.</p>	<p>The design for the replacement gate house building was discussed at pre-application phase. The buildings have been carefully designed to address the entrance to the site and provide a sense of arrival.</p>

## WSCC Education

WSCC Education responded to the application on 23d July 2025 confirming that they offer **no objection**.

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## Parish Council

The Parish Council responded to the application on 22 May 2025. They have **no objection** in principle. A response is provided on behalf of the applicant Nexus Planning.

Parish Council comment (summarised)	Applicant team response
<p>The impact on the road network around and within the site including the access into and out of the site, the use of people on mobility scooters, and the width of the roads and concur with the concerns expressed by WSSC Highways regarding the extra work and information required. Furthermore, concerns re vehicular access in that residents will only be able to use one exit/entrance for the side of the development they are on.</p>	<p>The applicant acknowledges concerns raised about traffic, access, and the local highway network. A full Transport Assessment has been submitted, prepared in line with national and local policy, following consultation with the Local Planning and Highways Authorities.</p> <p>The WSSC comments have been responded to, in detail, within this letter. Furthermore, a Supplementary Highways Note has been provided to address residual concerns.</p>
<p>Parking within the site and the lack of spaces beside or in front of the properties with the concern that competing for unallocated spaces may occur that could lead to neighbour disputes further along the line. Members note that the parking meets the standard for WSSC Highways but feel it is not adequate for the site.</p>	<p>In terms of parking, across the site, the requirement for car parking is 247no. car parking spaces and a total of 252no. car parking spaces are provided. For cycle parking, circa 168no. spaces are required and 220no. are provided.</p>
<p>Concerns around proximity to local amenities</p>	<p>The site's sustainable location supports a reduced reliance on private vehicles. It is situated within a 15-minute walk of Horsham Train Station and just over a 20-minute walk from Horsham Town Centre, offering convenient access to a range of public transport options, services, and amenities. This level of accessibility promotes more sustainable modes of travel, aligning with both local and national planning objectives to encourage active and low-carbon transport choices. This is considered in more detail as part of a review of walking and cycling routes, undertaken subsequent to the planning application submission, and now submitted to the LPA.</p>

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<p>Concerns on the topic of design, namely overdevelopment and the entrance to Wimblehurst Road</p>	<p>ACG architects were appointed by the applicant to design the scheme layout and proposed house types. The scheme design was developed over a period of time, involving pre-application liaison with the Local Planning Authority (including discussion around the topic of Wimblehurst Road entrance way, and density of development).</p> <p>The planning application is accompanied by a Design and Access Statement. This details the design development process, and outlines key constraints and opportunities associated with the site.</p>
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### **Wimblehurst Residents Association**

The Wimblehurst Residents Association responded to the application on 19<sup>th</sup> May 2025. A response is provided on behalf of the applicant by Nexus Planning.

Wimblehurst Residents Association comment (summarised)	Applicant team response
Comments on the topic of 'Overdevelopment'	<p>The scheme has been carefully designed by ACG Architects, following pre-application discussions with the Local Planning Authority and other stakeholders.</p> <p>A Design and Access Statement supports the application, outlining the design process, showing a detailed contextual analysis and responding to site constraints and opportunities. This is supplemented by an additional DAS document focused on 'Building 3'.</p>
Comments on the topic of Highways, access and parking	<p>The applicant acknowledges concerns raised about traffic, access, and the local highway network. A full Transport Assessment has been submitted, prepared in line with national and local policy, following consultation with the Local Planning and Highways Authorities.</p>

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	<p>The Assessment concludes the site is well located for access to local amenities, the highway network, cycle routes, and public transport. No highways safety concerns were identified.</p> <p>The site's sustainable location supports a reduced reliance on private vehicles. It is situated within a 15-minute walk of Horsham Train Station and just over a 20-minute walk from Horsham Town Centre, offering convenient access to a range of public transport options, services, and amenities. This level of accessibility promotes more sustainable modes of travel, aligning with both local and national planning objectives to encourage active and low-carbon transport choices. This is considered in more detail as part of a review of walking and cycling routes, undertaken subsequent to the planning application submission, and now submitted to the LPA.</p> <p>It is proposed that pedestrian and cycle access is provided between the phases of the wider site, but that vehicles would not pass between them (to prevent 'rat running').</p> <p>In terms of parking, across the site, the requirement for car parking is 247no. car parking spaces and a total of 252no. car parking spaces are provided. For cycle parking, circa 168no. spaces are required and 220no. are provided.</p>
Comments on the topic of Water, drainage and environmental considerations	<p>The applicant acknowledges concerns raised regarding local drainage capacity, air and noise pollution, land contamination, and biodiversity loss. A drainage strategy has been prepared in line with relevant guidance, in collaboration with Southern Water and the Lead Local Flood Authority (LLFA).</p> <p>For surface water, a Sustainable Urban Drainage System (SuDS) is proposed, using permeable paving and attenuation crates, discharging into existing or new Southern Water infrastructure.</p>

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Comments on the topic of Trees and landscaping	<p>To address biodiversity the landscape design includes habitat creation supporting a 10% Biodiversity Net Gain that will be supplemented by securing off-site credits. Additional mitigation and ecological surveys have been included in the planning application.</p> <p>As detailed in the Planning Statement, where possible, existing trees on the site will be protected during both construction and operation. Though some trees will be removed as detailed in the submitted Tree Report, a programme of tree planting is proposed.</p> <p>With regards to the sizable blue cedar trees that are present along the length of the central vehicular access route. Unfortunately, due to the current poor condition and limited lifespan for the majority of the specimens present these trees all are to be removed. This is a necessary strategic decision and one that has not been taken lightly, but critical from the perspective of ongoing inhabitant safety. The significant visual presence of these existing trees has been fully understood and realised as a fundamental site feature and key design driver, resulting in a commitment to fully reinstate the tree lined corridor with suitable replacement tree species. Thereby ensuring that the appearance, quality and continuity of the tree lined views framing the locally listed heritage building are maintained.</p>
Comments on the topic of Privacy, light and noise	Environmental assessments confirm minimal impact. These topic areas are addressed in turn, in detail, within this report.

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## Public Comments

Public comments have been made on the application as part of the statutory consultation period. In the interest of confidentiality and in view of a desire to provide a high-quality response, comments are addressed thematically with reference to relevant consultee responses and technical reporting as necessary.

Public Comment (by theme)	Applicant team response
Impact on local highways network	<p>The applicant is cognisant of public comments regarding traffic movements, highways, access, and transport.</p> <p>A full transport assessment has been prepared to accompany the planning submission. It has been prepared in accordance with relevant guidance and national and local policy. In depth liaison with the Local Planning Authority and the Highways Authority has taken place throughout the preparation of the documents and to inform scheme design.</p> <p>The assessment concluded that the site is well located in relation to local facilities and amenities, the local and strategic highway network, the local cycle network and public transport services. The report found no local highways safety concerns.</p> <p>The Transport Assessment has demonstrated that the proposed development would not have a severe impact on the operation and safety of the local road network. The scheme provides opportunities to enhance the local walking and bus networks in particular for both future and existing residents in the locale.</p>
Perceived overdevelopment and density of development	<p>ACG architects were appointed by the applicant to design the scheme layout and proposed house types. The scheme design was developed over a period of time, involving pre-application liaison with the Local Planning Authority and other stakeholders.</p> <p>The planning application is accompanied by a Design and Access Statement. This details the design development process, and outlines key constraints and opportunities associated with the site.</p>
Surface water and foul water drainage	<p>The applicant is cognisant of public comments regarding drainage capacity locally.</p> <p>The planning application is accompanied by a drainage strategy, prepared in line with all applicable guidance and in partnership with Southern Water and the Lead Local Flood Authority (LLFA).</p>

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	<p>For Surface Water drainage, a sustainable urban drainage system (SuDS) is proposed. It is proposed that the new surface water drainage will be attenuated through the use of tanked permeable paving and cellular attenuation crate systems before discharging into either existing Southern Water storm sewers or a newly proposed Southern Water diversion.</p> <p>For foul water, the system will discharge to a proposed foul manhole on an existing Southern Water sewer within Parsonage Road. Due to the existing topography, the foul drainage collected from some of the site will discharge to a new on-site package pumping station that will pump the flows back up to the manhole at the entrance to the site, so that one singular gravity connection onto the Southern Water sewer will be made within Parsonage Road.</p>
Land Contamination	<p>The applicant is cognisant of public concerns regarding land contamination. A Contamination Assessment has been submitted with the application. It confirms that the land is suitable for residential use and does not present a risk that would prevent development.</p>
Loss of Trees	<p>As detailed in the Planning Statement, where possible, existing trees on the site will be protected during both construction and operation. Though some trees will be removed as detailed in the submitted Tree Report, a programme of tree planting is proposed.</p> <p>With regards to the sizable blue cedar trees that are present along the length of the central vehicular access route. Unfortunately, due to the current poor condition and limited lifespan for the majority of the specimens present these trees all are to be removed. This is a necessary strategic decision and one that has not been taken lightly, but critical from the perspective of ongoing inhabitant safety. The significant visual presence of these existing trees has been fully understood and realised as a fundamental site feature and key design driver, resulting in a commitment to fully reinstate the tree lined corridor with suitable replacement tree species. Thereby ensuring that the appearance, quality and continuity of the tree lined views framing the locally listed heritage building are maintained.</p> <p>In addition, the proposed landscape design delivers a significant number of new habitats, contributing to a 10% Biodiversity Net Gain, supported where necessary by off-site biodiversity credits. All identified species on site will be subject to appropriate ecological surveys and subsequent mitigation to ensure the development does not negatively impact them, as detailed in the ecological reporting which formed part of the planning application, and the ecological interim note which forms part of this submission.</p>

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