



Former Novartis Site, Parsonage Road, Horsham

Planning and Affordable Housing Statement

ON BEHALF OF LOVELL PARTNERSHIPS

March 2025

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1. Introduction

- 1.1 This Planning and Affordable Housing Statement has been prepared by Nexus Planning on behalf of Lovell Partnerships (“the Applicant”) in support of a planning application at Novartis Site, Parsonage Road, Horsham, West Sussex (“the Site”), to Horsham District Council as the Local Planning Authority (“LPA”) for the following proposed development:

Residential development comprising approximately 206 dwellings, including the conversion of ‘Building 3’ and the 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.

- 1.2 The Former Novartis site has remained vacant for several years. Planning permission was granted for the redevelopment of the site in 2020 (reference: DC/18/2687) for a mixed-use development comprising new homes and employment floorspace. For the reasons described in this Statement, it was not possible to deliver that planning permission, and it has now ‘time expired’.
- 1.3 The site is in a highly sustainable location and is Brownfield land. It is exactly the type of site that planning policy at all levels promotes for the delivery of development, and particularly housing. This planning application would bring forward 206 new homes in Horsham.
- 1.4 The Council’s advertised position is that new homes are much needed in the district. The most up to date Annual Monitoring report states a housing land supply position of 2.9 years, and that is before the government’s new standard housing method for housing need is incorporated into that. This site would make an important contribution towards meeting what is clearly a pressing need for new homes in Horsham.
- 1.5 There is also a particularly acute need for new affordable homes, with a large housing waiting list. This planning permission would deliver at least a policy compliant (35% at the time of writing) provision of affordable units.
- 1.6 This proposal represents a significant opportunity to bring back into use a previously developed and well-located site for much needed new homes, through the delivery of a well-designed, high-quality development.

Planning application submission documents.

- 1.7 The following documents are submitted in support of this application for Full planning permission:
1. Application form including ownership certificates, prepared by Nexus Planning.
 2. Community Infrastructure Levy forms, prepared by Nexus Planning.
 3. Architectural Plans prepared by ACG.
 4. Landscape Plans prepared by Fabrik.
 5. Design and Access Statement prepared by ACG.
 6. Arboricultural Statement prepared by Hayden’s.
 7. Biodiversity Net Gain (BNG) Impact Assessment prepared by Greengage.
 8. Ecology (Biodiversity Survey and Report) prepared by Greengage.
 9. Air Quality Assessment prepared by Spectrum.
 10. Noise Assessment prepared by Spectrum.
 11. Sustainability and Energy Statement prepared by WD.
 12. Flood Risk Assessment prepared by Arch Associates.
 13. Surface Water Drainage Statement prepared by Arch Associates.
 14. Heritage Statement and Heritage Environment Record (HER) Search prepared by Orion.

15. Archaeology Report prepared by Orion.
16. Land Contamination Statement prepared by Leap Environmental.
17. Statement of Community Involvement prepared by Cavendish.
18. Transport Assessment prepared by PBA.
19. Travel Plan prepared by PBA.
20. Water Neutrality Statement prepared by Waterstone.
21. Utilities/Services Strategy/Assessment prepared by Waterstone.
22. Fire Statement prepared by BB7.
23. Structural Statement and Survey (existing buildings) prepared by Gravity.
24. Daylight/Sunlight Assessment prepared by Hollis; and
25. Waste Management Plan prepared by PBA.

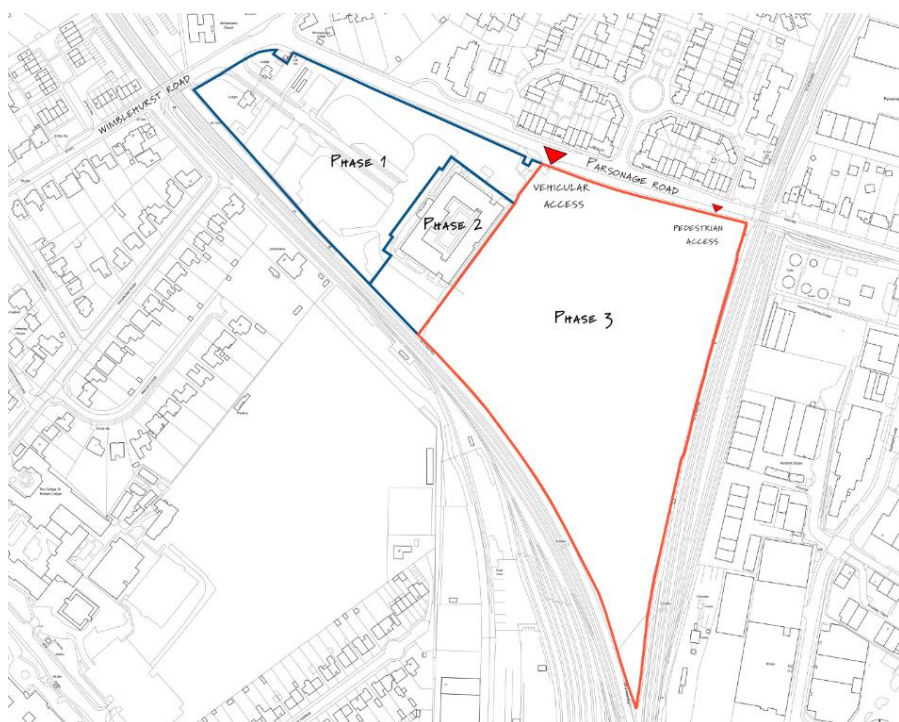
2. Site Context

- 2.1 The application site forms part of a wider parcel of land known as the former Novartis site, which is approximately 7.5ha in size, and located within the defined settlement of Horsham Town. As per Policy 3 of the adopted Horsham District Planning Framework (HDPF), Horsham is the only Tier 1 settlement and is considered the most sustainable and accessible town in the District.
- 2.2 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. The site has remained vacant since that time.

The Application Site and Surrounding Area

- 2.3 The site is approximately 2.8ha and comprises the western portion of the wider former Novartis Site. The site's location is identified by the blue outline in figure 2.4.1 below, with the red outline identifying the remainder of the wider site.
- 2.4 A separate planning application for residential development at the eastern part of the site will also be submitted.

Figure 2.4.1 Site Location Plan (Phase 1 and 2 identified by red outline, and Phase 3 identified by blue outline)



- 2.5 The site is previously developed, brownfield land, as defined by the National Planning Policy Framework 2024 (NPPF). It previously contained office buildings, workshops, research facilities, staff areas, a canteen, and extensive hard standing parking areas. All former buildings have been demolished, and the site is now clear.
- 2.6 There are two remaining buildings on the site, known as 'Building 3' and 'Building 36'.
- 2.7 Building 3 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. Building 36, attached to Building 3, is a more modern structure from the

1980s and is not listed. A courtyard between the buildings, originally a private employee area, includes planting areas and a small artificial pond.

- 2.8 The northern site boundary is defined by Parsonage Road, with mature trees along its length. There is an existing access point from Parsonage Road. The western boundary is defined by Wimblehurst Road, with a second access point that leads directly towards Building 3, along a tree-lined avenue. The trees, subject to a Tree Preservation Order (TPO), have become overgrown since the site's vacancy. The south-western boundary of the site is defined by railway lines extending from Horsham Train Station.
- 2.9 The application site adjoins the eastern portion of the former Novartis site (that will come forward as an independent application) and is bound to the east by railway lines extending from Horsham Train Station.
- 2.10 The application site lies within Flood Zone 1 (denoting the lowest fluvial flood risk).
- 2.11 The site is located within a mixed-use area. To the west and north, there is residential development which includes various dwelling types, including flats. In 2014, an application was approved for the demolition of the former Novartis social club to accommodate 160 dwellings, located on the northern side of Parsonage Road and that development provides a residential context in that location (LPA ref. DC/14/1624).
- 2.12 Horsham Railway Station and the Town Centre are within walking distance from the site (12-15 minutes, 0.7 miles). The station provides direct services to London Victoria, London Bridge, Southampton, Portsmouth, and Bognor Regis. The town centre is an additional 8-minute walk from the station.
- 2.13 Between the site and Horsham Town Centre lies Horsham Park, a large public open space with play areas, footpaths, and an open-air fitness area. Horsham Leisure Centre is adjacent to the park.
- 2.14 The closest listed building is the Grade II Listed Parsonage Farmhouse (ID1353940), located to the northeast of the site. The Richmond Road Conservation Area, to the southwest, covers parts of Wimblehurst Road, Gordon Road, and Richmond Road.

3. Planning History

- 3.1 The site has an extensive planning history, related to its previous use by Novartis Pharmaceuticals. Planning history in so far as it is relevant to the current application, is summarised below:

LPA ref.	Description of Development	Decision
DC/12/2341	Prior Notification for the demolition of a number of buildings on the site including boiler house, chiller building, production and stores building, cycle rack, restaurant, document management centre, engineering building, ancillary services building, systems recovery building, gas convertor station, water store, entrance gatehouse, archive building, development building, despatch building, temporary offices and sprinkler tank.	Prior Approval Permitted with Conditions - 25 th June 2013
DC/12/2342	Creation of new access off Parsonage Road, new internal parking arrangements, new staff amenity space and associated landscaping.	Approved – 29 th May 2013
DC/14/1708	Prior notification for the demolition of various buildings on the site (as an amendment to prior approval DC/12/2341).	Prior Approval Required – 16 th September 2014
DC/14/1975	Prior approval for the demolition of various buildings on the site (as an amendment to prior approval DC/12/2341)	Prior Approval Refused – 11 th November 2014
DC/15/2109	Demolition of: Building 6 Coal Hopper, Building 7 - Water Treatment and Sub-station, Building 8 - Boiler House, Building 17 - Solvent Store, Building 30 - Solvent Store, Building 31 Waste Management Centre, Building 32 Solvent Drum Store, Building 42 - Research Building.	No objection to Notification – 9 th November 2015
DC/18/2687	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) within the ground floor of converted building 36. Improvements to existing pedestrian and vehicular accesses from Parsonage Road and Wimblehurst Road, new cycle and pedestrian accesses from Parsonage Road, together with associated parking and landscaping. All matters reserved except for access.	Approved – 11 th February 2020
DC/23/0183	<u>Phase 1</u> - Reserved Matters application (covering appearance, landscaping, layout and scale) pursuant to outline permission DC/18/2687, proposing the erection of 123 residential units (with associated infrastructure); and including the details required by outline Condition 21 (the scheme of noise and vibration attenuation) and outline Condition 24 (Cedar Tree Reports).	Application Validated 30 th January 2023 – Undetermined

	Phase 2 - Reserved Matters application (covering appearance, landscaping, layout and scale) pursuant to outline permission DC/18/2687, proposing a total of 137 residential units (of which 40 units will be new-build, and 97 units will be delivered as part of the conversion of the Central Buildings 3 and 36) and the provision of 618 sqm (GIA) of flexible commercial /community space at the ground floor of Building 36; and including the details required by outline Condition 21 (the scheme of noise and vibration attenuation).	Application Validated 3 rd February 2023 – Undetermined
DC/23/1382	Non-Material Amendment to previously approved application DC/18/2687 (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) within the ground floor of converted building 36. Improvements to existing pedestrian and vehicular accesses from Parsonage Road and Wimblehurst Road, new cycle and pedestrian accesses from Parsonage Road, together with associated parking and landscaping. All matters reserved except for access) Amending the drafting of Condition 24.	17 th July 2023.
EIA/24/0007	EIA Screening	7 th January 2025 – The overall scale and nature of the impacts that would arise from the scheme do not require an EIA.

3.2 The 2020 outline planning permission at the site was for a mix of residential and employment uses. Whilst two reserved matters applications were submitted pursuant to the residential element of the site, no such application was submitted relating to the employment element within the time limit imposed by the planning permission. That is because there was no market interest in taking forward that part of the site in a viable form. Please refer to the submitted Marketing Report by Vail Williams which is submitted in support of this application.

4. Pre-Application Engagement

4.1 The Applicant has engaged in extensive pre-application discussions with the Local Planning Authority, facilitated by a Planning Performance Agreement. A summary of the outcomes of the PPA meetings is set out below.

PPA 1 – 30 August 2024

- The LPA were comfortable with the revised layout, when compared to the reserved matter scheme that was submitted to the LPA in January 2023 (ref. DC/23/0183).
- The LPA's Conservation officer was comfortable with the removal of 'Building 36', while retaining 'Building 3'.
- The LPA requested that the design of the replacement boulevard trees ensures that a view through the site to 'Building 3' is retained. The replacement of these trees was considered acceptable in principle because of their poor health.
- The LPA advised the applicant to retain a similar design approach to application ref. DC/23/0183.

PPA 4 – 24 January 2025

- The LPA confirmed that they would be seeking a policy compliant quantum of affordable housing of 35%.
- The LPA indicated that they are comfortable applying planning conditions to decisions relating to water neutrality, allowing for a development to rely on SNOWS (when in place) or a site specific bespoke solution.
- The LPA indicated that they were pleased with the updated design and landscaping approach at the site, and noted support for the significant improvements to the boulevard design and open spaces at the site.
- Despite the 'gatehouse' buildings being different to those proposed under ref. DC/23/0183, they were nevertheless regarded as acceptable.
- The LPA encouraged the design team to explore whether buildings at the end of the boulevard, opposite the heritage building could be increased in height/ prominence to assist with the transition between the heritage building and the dwellings, which the Applicant team were committed to explore.
- The Applicant Team agreed to review balcony design on the flat blocks, so as to potentially introduce a greater amount of perforation to them, similar to the heritage building.
- The LPA noted preference for as many three bed units to be provided as affordable as possible.
- The Applicant team were asked to provide the LPA with details of the proposed Dawn Redwood trees to be planted along the boulevard, so that the tree officer could give their view on them.
- The LPA raised the matter that active travel would be a material consideration in the design team, which the Applicant team confirmed was being incorporated as part of the development.
- The LPA advised that the scheme should demonstrate that noise levels would be acceptable, and that care should be taken in protecting the roots of existing off-site trees.

4.2 Additionally, a comprehensive programme of engagement has taken place with the local community and elected Members of the Council. This included presentations and a well-attended exhibition of the proposals. The Applicant team has listened carefully to feedback to that consultation programme and where possible, the scheme has been amended to reflect comments made.

4.3 The planning application is supported by a detailed Statement of Community Involvement, that describes the pre-submission engagement that has taken place.

5. The Proposed Development

- 5.1 Full planning permission is sought for the development of the site to provide 206 new homes. The development proposal consists of the following housing mix:

	Apartments	Houses	Total	%.
1 bedroom	71	0	71	34%
2 bedrooms	87	4	91	44%
3 bedrooms	1	24	25	13%
4 bedrooms	0	19	19	9%
Totals	159	47	206	100%

- 5.2 10 of the units (4.8%) would comply with M4(3) standards and would be wheelchair accessible.
- 5.3 The units will be provided within townhouses, residential terraces and apartment buildings, that respect the setting of the Locally Listed Building 3 which is characterised by its Art Deco structure.
- 5.4 Building 3 is to be converted into apartments, with its existing mansard roof being replaced with a new lightweight structure to accommodate a new 3rd floor for residential use. Four sympathetic apartment blocks are proposed to attach to the rear wings of Building 3, as well as to the north east and south west of the buildings.

Figure 5.4.1 Proposed Phase 1&2 Site Plan (by ACG Architects)



- 5.5 The character of the site is to be set through the provision of diverse amenity spaces. The existing central boulevard at the site is to be enhanced through the planting of new trees as part of the development, to enhance the views towards

the Locally Listed Building. The landscape design of the development has also ensured connectivity the Woodland Walk that runs around the perimeter of the eastern portion of the Former Novartis site and has created a long connected loop that encourages exercise and journeying.

- 5.6 Ecological zones, open green spaces and play areas will offer another range of activity and opportunities for residents and visitors, through the enhancement of play and recreation, and supporting local ecology.
- 5.7 252 parking spaces are proposed as part of the development, comprising 12 M4(3) parking spaces and 240 parking spaces. One parking space per residential dwelling will be provided with an EVC charging point, and all remaining spaces will have passive charging facilities. This provision meets the requirements of the West Sussex County Council Parking Standards. All the homes would be provided with 'on-plot' cycle parking, divided between private storage for dwelling houses and communal storage for the apartment buildings.
- 5.8 The density of the development would be 76 dwellings per hectare. This density finds the balance between providing a high quality of living accommodation for future occupiers with a form of development compatible with its context, whilst making efficient use of this previously developed and sustainably located site.

6. Planning Policy

6.1 This section of the Planning Statement provides an overview of the key planning policies relevant to the proposed development

The Development Plan

6.2 Section 38 (6) of the Planning & Compulsory Purchase Act 2004 requires that, planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise.

6.3 The adopted Development Plan for Horsham currently comprises:

- Horsham District Planning Framework (2015); and
- Horsham District Planning Framework Policies Map (2015).

6.4 The following documents are also material considerations in the determination of the planning application:

- National Planning Policy Framework (NPPF) (December 2024).
- West Sussex County Council Guidance on Parking at New Developments (2020).
- West Sussex Transport Plan 2022 – 2036 (2022).
- West Sussex Walking and Cycling Strategy 2016 – 2026 (2016).
- West Sussex Active Travel Strategy 2024 – 2036 (2024).
- Planning Advice Note (“PAN”) which covers the principles of Biodiversity Net Gain (“BNG”) (2022).
- Open Space, Sport and Recreation Review (June 2021) (Evidence base document for Draft Regulation 19 Pre-Submission Horsham District Local Plan).
- Northern West Sussex Strategic Housing Market Assessment (2019).
- Planning Obligations and Affordable Housing SPD (2017).
- Planning Noise Advice Document Sussex (2023).
- Horsham Town Design Statement (2008).
- Water Neutrality Studies: Part B and Part C (2022).
- Horsham Local Plan Water Neutrality Technical Note (2021); and
- Position Statement from Natural England (2021) on Water Neutrality.

6.5 There is no ‘made’ Neighbourhood Plan affecting the site.

Horsham District Planning Framework (HDPF) (2015)

6.6 The HDPF was adopted in November 2015 and outlines the Council's planning strategy for meeting the district's social, economic, and environmental needs through to 2031. However, as the plan is over five years old and does not reflect the most current housing needs of the district, it carries less weight in the decision-making process.

6.7 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 be provided by other uses in a sequential test with a combined training and employment use first and employment use solely secondly.”

6.8 The remaining key policies from the HDPF which are considered to be relevant to the proposal include:

- Policy 1 – Sustainable Development;
- Policy 2 – Strategic Development;
- Policy 3 – Development Hierarchy and Settlement Expansion;
- Policy 15 – Housing Provision;
- Policy 16 – Meeting Local Housing Needs;
- Policy 24 – Environmental Protection;
- Policy 31 – Green Infrastructure and Biodiversity;
- Policy 33 – Development Principles;
- Policy 35 – Climate Change;
- Policy 36 – Appropriate Energy Use;
- Policy 37 – Sustainable Design and Construction;
- Policy 38 – Flooding;
- Policy 40 – Sustainable Transport;
- Policy 41 – Parking;
- Policy 42 – Inclusive Communities; and
- Policy 43 – Community Facilities, Leisure and Recreation.

6.9 All policies of relevance are explored in relation to specific planning issues within Section 7 of this Planning Statement.

Draft Horsham District Local Plan 2023 – 2040

6.10 Horsham 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, Horsham District Council received a letter from the Planning Inspectorate which indicated significant concerns regarding the soundness and legal compliance of the Plan.

6.11 As such, it is not currently clear when a new Plan for Horsham will be adopted. We have nevertheless considered the policies of the emerging Plan, in so far as they relate to this development proposal. Those of most relevance to this application are as follows:

- Policy 1 – Sustainable Development;
- Policy 2 – Development Hierarchy;
- Policy 4 – Horsham Town;
- Policy 6 – Climate Change;
- Policy 7 – Appropriate Energy Use;
- Policy 8 – Strategic Design and Construction;
- Policy 9 – Water Neutrality;
- Policy 10 – Flooding;
- Policy 17 – Green Infrastructure and Biodiversity;
- Policy 19 – Development Quality;
- Policy 29 – New Employment;
- Policy 30 – Enhancing Existing Employment Sites and Premises;
- Policy 38 – Meeting Local Housing Needs; and
- Policy 39 – Affordable Housing.

6.12 Strategic Policy 1 (Sustainable Development) maintains the presumption in favour of sustainable development as set out in the NPPF.

- 6.13 Strategic Policy 2 (Development Hierarchy) indicates Horsham as the only Main Town within the district. The Policy lists the characteristics and function of Horsham as “Settlement with a large range of employment, services and facilities and leisure opportunities, including those providing a district function. Strong social networks, with good rail and bus accessibility. The settlement meets the majority of its own needs and many of those in smaller settlements.”
- 6.14 Strategic Policy 4 (Horsham Town) aims to support the town’s growth and prosperity while preserving its unique character and maintaining its role as the primary and cultural hub in the District.
- 6.15 Strategic Policy 6 (Climate Change) seeks to ensure that the impacts of climate change are fully considered from the onset of early design. This includes ensuring sustainable and active modes of transport and forms of movement are actively promoted as an alternative to private car use, and ensuring that developments are adapted for the climate it will experience over its lifetime by incorporating flexible climate change reduction and adaption technologies. There is also an expectation for new development is as a minimum designed to be net zero carbon in construction and operation.
- 6.16 Strategic Policy 7 (Appropriate Energy Use) aims to ensure that developments consider the most appropriate energy use as a means of improving efficiency into their design.
- 6.17 Strategic Policy 8 (Strategic Design and Construction) seeks to ensure that new development is designed and constructed in a way that helps the District achieve zero carbon emissions by 2050, as well as enabling flexibility in design to enable buildings to be easily adapted, to reflect changing lifestyle needs and mitigate against and/or adapt to the impacts of climate change.
- 6.18 Strategic Policy 17 (Green Infrastructure and Biodiversity) sets out that relevant development proposals will be expected to deliver 12% biodiversity net gain and must submit Biodiversity Net Gain information to show how this will be achieved using the mandated Biodiversity Metric.
- 6.19 Strategic Policy 29 (New Employment) regards the ‘Former Novartis Site, Horsham’ as an existing commitment to provide 25,000 square metres of E(g)(i) (Grade A office space), and complementary flexible employment space (B2/B8/E(g)). The allocation of the site is not however carried over within the draft policy for the provision of employment space.
- 6.20 Strategic Policy 30 (Enhancing Existing Employment Sites and Premises) focuses on protecting existing employment sites for office, industrial, storage, and distribution uses (B2, B8, and E(g) Use Classes), aiming to maintain local employment opportunities. The policy allows for the consideration of alternative uses only when a site is no longer economically viable for employment, supported by evidence including a year-long marketing effort, proof of site condition, and confirmation from commercial agents or financial assessments showing unviability. The policy also applies to sites with permitted employment development that has not yet started. Additionally, employment sites outside designated Key Employment Areas are protected for business, manufacturing, and distribution uses, with proposals for alternative uses subject to thorough viability assessments.

National Planning Policy Framework

- 6.21 The revised National Planning Policy Framework (“NPPF”) was published in December 2024, replacing the previous NPPF with immediate effect. The NPPF sets out the Government’s planning policies for England, how these are expected to be applied, and maintains that a presumption in favour of sustainable development is at the heart of the Framework (Paragraph 10).
- 6.22 Paragraph 7 of the NPPF sets out that “the purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development and supporting infrastructure in a

sustainable manner”. As set out within Paragraph 8, achieving sustainable development is achieved through economic, social and environmental objectives which are interdependent and need to be pursued in mutually supportive ways.

- 6.23 When considering decision taking, Paragraph 39 of the NPPF states that “Local Authorities should approach decisions on proposed development in a positive and creative way”, and that “they should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area.”
- 6.24 Chapter 5 focuses on delivering a sufficient supply of homes, to support the Government’s objective of significantly boosting the supply of homes. Paragraph 61 notes that “...it is important that a significant amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.”
- 6.25 Paragraph 66 seeks to ensure that major development which involves the provision of housing is proposed, planning decisions should expect that the mix of affordable housing required meet the identified need across Social Rent, other affordable housing for rent and affordable home ownership tenures.
- 6.26 Whilst the site is not located within Horsham Town Centre, it is located within with wider Horsham Town area and Paragraph 92 states that “when considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre.”
- 6.27 Chapter 5 promotes the creation of healthy and safe communities, and Paragraph 96 looks for decisions to be made when applications promote social interaction, are safe and accessible, and enable and support healthy lives.
- 6.28 Chapter 11 seeks to make the most effective use of land, with Paragraph 124 stating that “Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’.”
- 6.29 Paragraph 125 expands on this by saying that planning policies and decisions should:
1. give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;
 2. promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure)
- 6.30 Paragraph 127 states that planning policies and decisions need to reflect changes in the demand for land. Where local planning authorities consider there to be no reasonable prospect of an application for a sites allocated use to come forward, they should reallocate land for a more deliverable use that can help address identified needs, and in the interim, prior to updating the plan, support applications for alternative uses on land, where the proposed use would contribute to meeting an unmet need for development in the area.
- 6.31 Paragraph 129 encourages that planning policies and decisions should support development that makes effective use of land, and achieving appropriate densities, considering:

1. *The identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*
2. *Local market conditions and viability;*
3. *The availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*
4. *The desirability of maintain an areas prevailing character and setting (including residential gardens), or of promoting regeneration and change; and*
5. *The importance of securing well-designed, attractive and healthy places.*

6.32 Good design is a key aspect of sustainable development, and the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve (paragraph 131). Paragraph 135 sets out that developments should:

1. *function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
2. *be visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
3. *be sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
4. *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
5. *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
6. *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and*
7. *where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.*

6.33 Paragraph 136 also highlights the importance of tree lined streets, ensuring that opportunities are taken to incorporate elsewhere in developments, to contribute to the character and quality of urban environments and also help to mitigate and adapt to climate change.

6.34 Chapter 16 of the NPPF deals with conserving and enhancing the historic environment. It requires that Heritage Assets (which includes archaeological remains) are conserved in a manner appropriate to their significance so they can be enjoyed for their contribution to quality of life for future generations.

6.35 Paragraph 207 states that when determining applications, planning authorities should “*require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.*”

6.36 When considering potential impacts on heritage assets, Paragraph 215 states that: “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”

7. Planning Analysis

7.1 In this section of the statement, we assess the proposal against the most relevant policies identified in the local development framework above. The assessment has specific regard to the following key issues:

- The principle of the development.
- Residential Unit Mix and Tenure.
- Scale, Massing and Impacts on Character and Heritage Assets.
- Residential Standards and Amenity.
- Landscape and Biodiversity.
- Water Neutrality.
- Drainage and Flood Risk.
- Pollution.
- Sustainability and Energy.
- Parking Provision.
- Sustainable Transport; and
- Refuse, Waste and Recycling.

The principle of the proposed development

Policy 8 of the adopted Local Plan

7.2 HDPF Policy 8 (University Quarter Mixed Use Development) anticipated that the Site would come forward in an education use with supporting student accommodation (rather than for employment). It provided for a circumstance where that did not happen (by 2021), allowing 'other uses' with reference to a sequential approach, with 'training and employment' to be considered first, and 'employment use solely' considered second.

7.3 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.

7.4 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), and as is advocated by both the sequential approach advocated by Policy 8, and paragraph 127 of the 2024 Framework.

The 'loss' of an employment use at the site.

7.5 The site was last used for an employment generating use, albeit it was vacated a number of years ago. The 2020 Outline planning permission included employment floorspace alongside residential development. That permission has not been implemented and has now lapsed.

7.6 HDPF Policy 9 (Employment Development) accommodates the release of employment sites and premises outside of Key Employment Areas where they 'demonstrate that the site/premises is no longer needed and/or viable for employment use'. Whilst the site is not an 'employment site or premises' (because there is no employment use operating there), if the

LPA sought to apply this policy to an application for a comprehensive residential development, the marketing evidence provided demonstrates that to provide employment floorspace at the site would not be appropriate.

7.7 The Reg19 Local Plan does not show the site as being subject to any specific designations, or as being allocated for any form of development. However, it does treat the site as an ‘Existing Employment Site’ on the basis that it is recognised as a “commitment” (see para 9.24a and Table 5 at para 9.11). Emerging Policy 30 (Enhancing Existing Employment) seeks that *“Employment sites and premises outside Key Employment Areas are protected for business, manufacturing, storage and distribution uses (B2, B8 and E(g) Use Classes) and appropriate sui generis uses.... Proposals for other uses will only be supported where it is demonstrated that both the premises and site are no longer needed and are no longer viable for employment use. An assessment of these should be submitted and must demonstrate:*

- a. *Evidence of active marketing over the period of at least a year, supported by*
 - i. *evidence of the condition of the estate and local economic market within the terms of sale and, where applicable, rent; and*
 - ii. *written confirmation from the commercial agent(s) regarding the redundancy and lack of viability of both the premises and site for employment or a financial appraisal demonstrating any employment use is unviable; and*
- b. *Where relevant, vacancy, including the reasons for vacancy and the length of time vacant.”*

7.8 Whilst the site is not an ‘employment site or premises’ (because there is no employment use operating there), we have taken the precautionary approach of demonstrating compliance with the requirements of both the extant and emerging policies that seek to protect such uses.

7.9 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.

7.10 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 (that are set out in the report).

7.11 The likely reasons for this are considered by Vail Williams, who conclude that when considering a B1 office use at the site (the use for which planning permission was granted, but then lapsed), ‘the location is neither suitable nor capable of sustaining office development under current market conditions’. That conclusion applies to single occupier office developments, and a collection of smaller occupiers in a campus arrangement.

7.12 Planning permission was not granted in 2020 for a B2 or B8 (industrial / warehouse) development, and so it follows that the site has not been aggressively marketed for those uses in the same way that it was for an office occupier (for which there was a planning permission in place). Nevertheless, the potential for bringing forward these uses has been investigated robustly.

7.13 Neither use would be viable at the site and so would not realistically ever be delivered. Nor would an industrial use be appropriate in this location, given the relationship with existing and proposed residential uses, and the traffic generation and hours of operation associated with those uses.

7.14 Finally, and whilst not traditional ‘employment uses’, the report investigates a potential leisure or education use at the site. Again, it concludes that there is no evidence of viable need for these uses in this location.

- 7.15 All of this analysis is underpinned by viability studies of the potential alternative uses.
- 7.16 Given the history of the site, and the long-held aspiration of the developer in this case to bring it forward in an employment use, it will be disappointing to some that an office, or other employment use is not being proposed. However, the reasons described in detail in the Vail Williams Report, it is simply not realistic to bring forward an employment use at the site. The need is not there for it, and such schemes cannot viably be delivered. The scheme clearly complies with the requirements of both adopted Policy 9, and emerging Policy 30 in that regard and it should be released from employment.
- 7.17 It is therefore appropriate to consider alternative uses for the site given its sustainable location and previously developed character.

Principle of Residential Development.

- 7.18 The principle of residential development at the wider Former Novartis site has been established by the approval of outline planning application.
- 7.19 The Site is previously developed land, in a sustainable location, where residential development has been found suitable at the western part of the site. As of April 2023, the Council's Authority Monitoring Report 2022/23 (published January 2024) said that it could demonstrate a housing land supply of 2.9 years (against the necessary 5-year requirement). This figure did not account for the increased 'standard method' figure for need introduced by the Government in December 2024. In that context, we would anticipate the principle of all types of housing at the Site to be strongly supported in principle.
- 7.20 In April 2023, there were 714 households on the Housing Register for the District and the 2019 SHMA identifies a net need of 344 new affordable rented homes and 159 affordable home ownership homes per annum in Horsham.
- 7.21 Given historic and continued unmet need in the district we would anticipate the Local Authority regarding the challenge of delivering affordable homes to meet need as being serious. We understand that at present, 433 households have expressed a need for affordable accommodation in the Holbrook Ward of Horsham alone. It is the Applicant's intention to deliver the maximum possible number of new affordable homes at the site, directly addressing this serious need.

Residential Unit Mix and Tenure

- 7.22 Policy 16 of the HDPF states that development should provide a mix of housing sizes, types and tenures and that the appropriate mix should be in accordance with the established character and density of the neighbourhood. dReg 19 Policy 38 seeks to achieve a mix of housing sizes, types and tenures that respond to local housing needs.
- 7.23 In relation to affordable housing, HDPF Policy 16 states that on sites providing 15 or more dwellings, 35% of dwellings will be required to be affordable (subject to viability). dReg 19 Policy 39 however sets a lower minimum of affordable housing where developments have a capacity of 10 or more homes (gross) or exceed 0.5 hectares. A minimum provision of 10% is sought on brownfield sites providing self-contained dwellings (houses and/or flats). At least 70% of the affordable homes provided should preferably be social rented homes or otherwise be affordable rented homes. The remaining 30% should be provided as low-cost home ownership which may include shared ownership and First Homes.
- 7.24 HDPF Policy 16 also states that if a development site is sub-divided so as to create two or more separate development schemes one or more of which falls below the relevant threshold, the Council will seek an appropriate level of affordable housing to reflect the provision that would have been achieved on the site as a whole had it come forward as a single scheme for the site.

7.25 The North West Sussex Strategic Housing Market Assessment (2019) identifies a strong need for 3 and 4 bedroom private properties within Horsham, with a stronger need for 1 and 2 bedroom properties within the affordable rented sector. The table below further details this identified need.

Figure 7.25.1 The need for different sizes of homes in Horsham

Tenure	Size	Percentage Need
Private	1 bed	4%
	2 bed	20%
	3 bed	41%
	4+ bed	35%
Affordable	1 bed	36%
	2 bed	32%
	3 bed	29%
	4+ bed	3%

(Northern West Sussex Strategic Housing Market Assessment, Icenj, 2019)

7.26 The proposed residential unit mix is designed to meet the objectives of HDPF Policy 16 and dReg 19 Policy 38, by offering a diverse range of housing sizes and types that respond directly to the identified local housing needs. In total, 206 new dwellings will be delivered, of which 34.5% will be one-bedroom, 44.2% two-bedroom, 12.1% three-bedroom, and 9.2% four-bedroom homes.

7.27 Within Horsham District, the minimum affordable housing need that was determined in the Council's evidence base for HDPF (2015) has not been met since the start of the adopted Plans period (2011/2012). With a shortfall in affordable housing being provided in the District, the number of households on the Council's waiting list for affordable housing has increased by 57% between 2014 and 2024, now standing at 756 households. This increase highlights the growing urgency for affordable housing to be provided in Horsham¹.

7.28 Breaking down the needs of these 756 households, 25% require one-bedroom homes, 23% require two-bedrooms, 41% require three-bedrooms, and 12% require homes with more than three bedrooms. This need positively supports the unit mix that is sought under this development proposal.

7.29 This development endeavours to meet the policy requirement in terms of affordable housing quantum at the site.

7.30 In summary, the proposed residential unit mix would meet the requirements of HDPF Policy 16 and dReg 19 Policies 38 and 39. By providing a range of unit sizes and delivering policy compliant affordable housing, the development addresses the critical local need for new homes in Horsham. This proposal will provide relief to the Council's waiting list, and as such it is considered that the development proposal is acceptable in this regard.

¹ Local Authority Housing Statistics data returns for 2023 to 2024, February 2025

Character and Appearance and Landscaping

- 7.31 HDPF Policy 32 states that development will be expected to provide an attractive, functional, safe and adaptable environment and should complement the locally distinctive characters of the District's heritage. It also states development should integrate well with the historic landscape in which it sits. Furthermore, LP Policy 33 states that the scale, massing appearance of new development should be of a high standard of design and layout and must respect the character of the surrounding area, including setting, townscape and views.
- 7.32 dReg 19 Policy 19 outlines that development that has good street design that prioritises pedestrians and cyclists, complements and responds to locally distinctive characters and heritage of the surrounding area and makes efficient use of land and optimises the provision and use of buildings and open space within a site will be supported.
- 7.33 HDPF Policy 34 relates to the protection of heritage assets. It states that HDC will sustain and enhance its historic environment through positive management of development affecting heritage assets. A number of criteria are set out within the policy, including the need to:

"5. Preserve, and ensure clear legibility of, locally distinctive vernacular building forms and their settings, features, fabric and materials;

6. Secure the viable and sustainable future of heritage assets through continued preservation by uses that are consistent with the significance of the heritage asset;

7. Retain and improves the setting of heritage assets, including views, public rights of way, trees and landscape features, including historic public realm features."

- 7.34 The development proposal has been designed in response to local context, including the proposed development at the western part of the wider site. The established character of the area is of a mostly domestic scale, interspersed with 2.5 storey houses and some 3 storey apartment blocks and townhouses. While in the wider vicinity of the site, dwellings are typically brick, with render in areas, the immediate surrounding of Parsonage Road represent more recent suburban housing developments. These are characterised by a varying material palette, mixture of brick and rendered facades. Gable projections, bay windows and chimneys are also all frequently observed in the local streetscape.
- 7.35 The heights of the dwellings on the site have been designed to respond to both the local context, particularly along Parsonage Road, the massing of 'Building 3', as well as the forthcoming development on the adjacent site. The townhouses, gatehouses and mews houses are proposed to be between 2 to 3 storeys in height to better respond to the context of Parsonage Road considering the slightly lower elevation that is experienced on the site.
- 7.36 The apartment blocks are larger in scale to respond to the existing massing of 'Building 3' and are between (effective) 5 to 5 storeys in height, with the existing tower of 'Building 3' being 6 storeys. An illustration of the proposed building heights, as found in the Design and Access Statement prepared by ACG Architects can be seen below.

Figure 7.36.1 Proposed Phase 1 & 2 Building Heights (by ACG Architects)



- 7.37 A Heritage Statement has been prepared by Orion Heritage in support of this Planning Application. The report assesses the potential impacts to nearby heritage assets that would arise from the proposed development proposal.
- 7.38 The only statutorily listed building within the vicinity of the site is the Grade II Listed Grammar School which is 35m west of the site boundary. The significance of this asset mainly derives from its date of construction and its retention of its historic built fabric which forms its historic and architectural interest.
- 7.39 'Building 3' is locally listed. The former pharmaceutical building was built by 1938 and reflects the influence of Scandinavian Architecture, combining both Arts and Crafts and Art Deco movements in a 'pared-down' design.
- 7.40 The site is not located within a Conservation Area, however Richmond Road Conservation lies 150m northeast of the site, and contains much of the built form of Wimblehurst Road, Gordon Road, Richmond Road and some of Hurst Road. The significance of the Conservation Area derives principally from the street pattern and associated tree planting which creates a strong sense of place. The vernacular buildings use a similar pallet and plan form which creates a sense of unity, further framed by the avenues lined with mature vegetation.
- 7.41 The report concludes that the development proposal is considered to cause no harm to the significance of the Grade II Listed Grammar School, as its distance from the proposed development, combined with the intervening built form and natural screening means that there will be limited visual connections between the two. The report also finds that there will be no harm to the significance of the Richmond Road Conservation Area, as any intervisibility will be hindered by natural screening along the western site boundary.
- 7.42 The application is supported by a report to demonstrate that there are no below ground heritage assets that should prohibit the grant of planning permission.
- 7.43 It is concluded that the sensitively proposed massing and heights, along with the use of sensitive colour palettes and facing materials that reflect the local vernacular architecture mean Phase 3 of the development is in accordance with

HDPF Policy 32, 33 and 34, as well as dReg Policy 19. Therefore, it is deemed that the development proposal is acceptable in this respect.

Landscaping

- 7.44 The development would include a large provision of green and open space, for both recreational and ecological purposes. The existing tree lined boulevard that leads to 'Building 3' is to be reinstated, and the trees will be replaced with high quality trees. The overall quality of the green and open space at the site would be high and the quantum would be appropriate, particularly given the urban character of the area and the availability of other public open space nearby.

Residential Standards and Amenity

- 7.45 HDPF Policy 33 and dReg19 Policy 20 both set out a number of design-led criteria with which the proposal at the Site would need to comply with, including the requirement for development to be designed to avoid unacceptable harm to the amenity of nearby residents through overlooking, noise, overbearing impacts.
- 7.46 Planning Noise Advice Document Sussex (2023) details considerations relating to noise for new noise sensitive development, and recommends night-time noise monitoring, as well as seeks that internal noise level criteria are in line with BS8233:2014 and WHO guidelines.

Daylight and Sunlight

- 7.47 A Daylight and Sunlight Report has been prepared by Hollis in support of this planning application. The report evaluates the daylight and sunlight levels within a representative sample of dwellings in the proposed development, as well as the impact of the development on daylight and sunlight between the new scheme and Phase 3 of the wider Former Novartis Site.
- 7.48 The assessment reveals that, of the 236 Living/Kitchen/Dining rooms assessed using the illuminance method, 219 (93%) will meet the BRE's daylight targets.
- 7.49 The remaining 17 rooms, located in Blocks 11, 12, 13, and 14, do not meet the targets. These blocks include the refurbishment of Block 14 and the new Blocks 11, 12, and 13. Blocks 12 and 13 are particularly constrained due to their design, which is shaped around the existing building's internal courtyard. While this design ensures a cohesive aesthetic and a gradual increase in height, it should be considered alongside the numerical daylight results.
- 7.50 All 236 rooms were also assessed for sunlight availability. Of these, 167 meet the BRE's sunlight targets.
- 7.51 The 69 rooms that fall short are all oriented with their main window facing within 90° of due north. As noted in the BRE guide, north-facing windows struggle to meet the targets due to limited sunlight exposure, particularly during certain times of the year. The guide acknowledges that in some sites, it is unavoidable to orient rooms with their main living windows facing south.
- 7.52 Of these 69 rooms, 19 are Kitchen/Dining areas. These spaces have been designed to prioritise sunlight in the main living area, which benefits from a southern orientation. While the sunlight in the Kitchen/Dining areas has been assessed for completeness, the BRE guide indicates that sunlight is less critical in these spaces.
- 7.53 Block 11 has been designed with north-facing windows to provide a more appealing view away from the site, enhancing privacy and avoiding a constrained southern view overlooking the existing Block 14.

- 7.54 44 external amenity areas, including garden spaces at Blocks C01 to C09 and C16 to C26, and a larger communal area at the entrance to Block C14, were also assessed for sunlight.
- 7.55 The assessment found that 32 of these areas will meet the BRE's sunlight targets, receiving at least 2 hours of sunlight over at least 50% of their area on the Spring Equinox (21st March). A secondary assessment conducted using the Summer Solstice (21st June) found that all 44 amenity areas meet the BRE's sunlight targets.
- 7.56 It is therefore considered that the proposed development adheres to HDPF Policy 33, and dReg19 Policy 20, and should be deemed acceptable in relation to daylight and sunlight impacts to current and future occupants.

Noise

- 7.57 An Acoustic Assessment Report has been prepared by Spectrum Acoustic Consultants in support of this development proposal.
- 7.58 The report has found that the site is affected by distant road traffic and rail noise.
- 7.59 To attenuate internal noise, the report sets out a scheme of sound insulation and ventilation for the building, to meet the acoustic standards as detailed in BS8233 and related documents. The scheme includes the utilisation of double-glazed windows, as well as Greenwood ventilators that meet the acoustic requirements. Assumptions for the analysis propose for there to be two vents in each bedroom and four in each living/dining/kitchen room, though the final numbers will be determined by a mechanical consultant.
- 7.60 If more vents are required to be installed, the acoustic specifications may need to be adjusted to maintain the desired indoor noise levels.
- 7.61 The report additionally sets out a proposal for post-construction validation by design review.
- 7.62 The report also demonstrates that there is no requirement for vibration attenuation measures, as the measured vibration levels were found to be significantly below the level that correlates to a low probability of adverse comment, as defined by BS6472.
- 7.63 Therefore, it can be concluded that subject to the development proposal implementing recommendations from the report, that internal noise levels in habitable rooms will satisfactorily be within the proposed limits, in accordance with HDPF Policy 33, and dReg19 Policy 20.

Trees, and Biodiversity

Trees

- 7.64 The planning application is supported by an Arboricultural report.

Biodiversity

- 7.65 From 12 February 2024, under the Environment Act 2021, all planning applications for major developments in England were required to deliver at least 10% Biodiversity Net Gain ("BNG"). Following this, on 2 April 2024 10% BNG became mandatory for small sites. The regulations include a number of exemptions.
- 7.66 BNG is measured using Defra's biodiversity metric and all off-site and significant on-site habitats will need to be secured for at least 30 years from the completion of development.

- 7.67 dReg19 Policy 17 will require development proposals to achieve a higher level of BNG, of at least 12%. This net gain is required to be provided through the delivery of appropriate on-site BNG or, where this is not practicable, through off-site net gain within the District especially areas, as suitable to the habitats subject to gain, identified in the District's Green Infrastructure Strategy or the Local Nature Recovery Strategy, or as agreed by the Council. It is relevant that the 12% requirement is not adopted policy at the time of writing.
- 7.68 HDPF Policy 31 requires development proposals to contribute to the enhancement of existing biodiversity and should create and manage new habitats where appropriate.
- 7.69 Furthermore, dReg19 Policy 17 highlights that green infrastructure should be integral to the design and layout of development, and new provision, including green linkages, should be provided. This new provision should seek to optimise public access to open space and nature via foot, bicycle, and wheeling.
- 7.70 A BNG Assessment has been prepared by Greengage in support of this planning application.
- 7.71 Final details of the proposed off-site compensation, including the Biodiversity Gain Site Register Reference will be submitted to the LPA upon receiving planning permission. As such, it is therefore demonstrated that the development proposal satisfactorily meets the requirement to achieve 10% BNG through the creation of new on-site habitats, and securing off-site habitat units to compensate for the shortfall on site.
- 7.72 A Preliminary Ecological Assessment of the site has been prepared and submitted in support of the planning application. This has identified the need for some additional species surveys. These will be prepared once the relevant survey windows open, and the reports provided to the Local Planning Authority at that time.

Water Neutrality

- 7.73 Water Neutrality is defined as development that takes place which does not increase the rate of water abstraction for drinking water supplies above existing levels.
- 7.74 The Environment Agency Water Stressed Area Classification has identified Horsham District as an area of serious water stress.
- 7.75 Horsham District is supplied with drinking water by Southern Water, and water is sourced from abstraction points in the Arun Valley. In September 2021, the council received a Position Statement from Natural England which, based on collected information, states that water abstraction for drinking water supplies is having a negative impact on the wildlife sites in the Arun Valley. The position statement advises that any new development that takes place must not add to this negative impact.
- 7.76 Whilst there is currently no adopted policy position setting out the requirements to achieve Water Neutrality in Horsham, dReg19 Policy 9 incorporates the above and requires all development within the Sussex North Water Resource Zone to demonstrate water neutrality through water efficient design and offsetting of any additional water use of the development. The Policy requires that new residential development is designed to utilise no more than 85 litres of mains water per person per day.
- 7.77 A Water Neutrality Statement has been prepared by Waterstone Design for the wider Former Novartis Site, and is submitted in support of this Planning Application. The statement investigates the anticipated water usage that the scheme will require, before reviewing three passive steps to reducing consumption, moving towards water neutrality.

- 7.78 Part 4.0 of the statement sets out that the development proposal will be required to limit daily water usage to 85 litres per day in accordance with dReg19 Policy 9, and restrictive flow devices will be fitted to water valves to limit flow rates and reduce individual water usage.
- 7.79 Based on the expected occupancy for the site of 501.55 people, which has been derived from Statistical Occupancy Rate by Type, taken from Horsham Council Guidance, the total daily water demand based on 85 litres per day is expected to be 42,632.75 litres per day. This equates to 15,560,589 litres per annum for Phase 3 of development at the Former Novartis Site.
- 7.80 The statement considers the possibility of incorporating rainwater and grey water harvesting features into the development proposal, and if they could be utilised, they could bring the total daily water demand down to 22,212 litres per day. Assuming that the existing site usage is nil, and rainwater and grey water harvesting was implemented to its full potential, the development proposal would need to offset 22,212 litres per day.
- 7.81 As set out in part 6.0 of the statement, a potential mitigation is utilising the LPA's strategic solution ('SNOWS'). It is understood that a levy would be required to be paid, based on residual water usage per day.
- 7.82 An alternative solution to water neutrality has also been explored, by retrofitting existing Housing Association stock with the same flow restriction technology that will be utilised on the site, thereby reducing water usage from an estimated 140 litres per day to 100 litres per day. In order to achieve water neutrality using this method, the funding of 432 homes to be retrofitted would be required. If rainwater and grey water harvesting was utilised as well, this could be reduced to 225 homes.
- 7.83 We understand that the Local Planning Authority will apply a planning condition to any consent that would require details of a mitigation scheme in advance of development commencing at the site.

Drainage and Flood Risk

- 7.84 The Environment Agency mapping shows the Site to be located in Flood Zone 1, indicating the lowest possible risk of flooding on site. However, due to its lower elevation compared to the surrounding roads, the site has experienced surface water flooding in the past.
- 7.85 HDPF Policy 38 and dReg 19 Policy 10 deal with flooding matters and require that developments over 1 hectare in Flood Zone 1 are accompanied by a site-specific Flood Risk Assessment. Where there is the potential to increase flood risk, development proposals should incorporate the use of sustainable drainage systems (SuDS) unless technically unfeasible or incorporate water management measures which reduce the risk of flooding and ensure flood risk is not increased elsewhere.
- 7.86 A Flood Risk Assessment (FRA) and Drainage Strategy (DS) is submitted in support of this application.
- 7.87 The development proposal complies with HDPF Policy 38 and dReg 19 Policy 10, and will not amount to increase flood risk as a result of appropriate mitigation measures being implemented.

Pollution

- 7.88 HDPF Policy 24 and dReg19 Policy 11 state that developments will be expected to minimise exposure to and the emission of pollutants including noise, odour, air and light pollution. dReg19 Policy 12 recognises the effects air quality has on public health, natural habitats and biodiversity, including its contribution to climate change, and the importance of the

management of air quality. It sets seven criteria relevant to Air Quality with which proposal will be required to comply with – paraphrased as follows:

1. Adhere to the Air Quality and Emissions Mitigation Guidance for Sussex (2021), or any future updates.
2. Contribute to the implementation of local Air Quality Action Plans.
3. Minimise traffic generation and congestion by maximising sustainable transport modes.
4. Encourage the use of cleaner transport fuels including the provision of electric car charging points.
5. Provide appropriate mitigation measures when a proposal is in close proximity to habitats or biodiversity designations that are sensitive to air quality changes.
6. Mitigate the impact on the amenities of users of the site and surrounding land to an appropriate level, during both construction and operation where development creates or results in pollution; and
7. Appropriately assess the cumulative impact of all relevant permitted and allocated developments, including associated traffic impacts.

7.89 An Air Quality Assessment (AQA) is submitted in support of this application.

7.90 The application is supported by a Contamination Assessment that demonstrates that the quality of the land is suitable for the proposed use of the site for residential.

Sustainability and Energy

7.91 HDPF Policy 6 and dReg19 Policy 8 state that all development will be required to contribute to clean, efficient energy by using less energy, supplying energy efficiently, and using renewable energy sources. All applications for residential or commercial development must include an Energy Statement demonstrating and quantifying how the development will comply with the above energy hierarchy. dReg19 Policy 8 requires development proposals to demonstrate how they will provide zero and low carbon heating in accordance with a set hierarchy.

7.92 HDPF Policy 35 supports developments that make a clear contribution to mitigating and adapting to the impacts of climate change and sets out a number of general measures which should be used to mitigate the effects of climate change. dReg19 Policy 36 deals with similar matters albeit the list of the individual criteria is longer. It also states that development proposals will only be supported where they include measures which contribute to achieving net zero carbon emissions across the district by 2050 at the latest and that development will be supported provided a Sustainability Statement is submitted which demonstrates how the development has taken measures to mitigate and adapt to the effects of climate change.

7.93 HDPF Policy 37 sets out sustainable design measures which should be incorporated where appropriate, including:

- Maximising energy efficiency and integrating the use of decentralised, renewable and low carbon energy.
- Limiting water use to 110 litres/person/day.
- Using design measures to minimise vulnerability to flooding and heatwave events.
- Designing to encourage the use of natural lighting and ventilation.
- Minimising construction and demolition waste and utilising recycled and low-impact materials.
- Flexibility to allow future modification of use or layout, facilitating future adaptation, refurbishment and retrofitting.
- All new development will be required to provide satisfactory arrangements for the storage of refuse and recyclable materials as an integral part of design.

7.94 dReg19 Policy 8 further requires development proposals to:

- Incorporate a Fabric First Approach, maximising the performance of the components and materials that form the building fabric itself, before consideration of the use of mechanical or electrical building service systems; and
- Include the provision of gigabit capable broadband access and enable provision of future communication technologies.

7.95 An Energy Statement has been prepared by Waterstone Design, to demonstrate how the application can achieve a reduction in CO2 emissions through the provision of renewable and low carbon technology.

7.96 The statement sets out the possible renewable and low carbon technologies that could be incorporated to the development, before proposing the following technologies:

7.97 Based on the modelling undertaken, the report sets out measures to incorporate heat pumps into the design of the development across the site to meet the requirements set out by the LPA. The heat pump strategy is as follows:

- **Low Carbon Heat Pumps** – houses are proposed to have their own individual Air Source Heat Pump to supply electricity from a renewable source, and the apartments will have their own individual Exhaust Air Heat Pump units. The statement suggests that the ASHPs for the houses will be situated to the side of the dwellings (where feasible) or at the rear within their private garden.

7.98 Further measures are set to be incorporated into the design of the proposed development, including high efficiency lighting and the installation of mechanical ventilation systems.

7.99 Subject to the successful implementation of the above technologies, the development proposal will reduce CO2 emissions by approximately 68.41% beyond the requirements of Part L of the Building Regulations.

7.100 It is therefore considered that through the provision of the renewable and carbon technologies as set out within the Energy Statement, the development proposal demonstrates compliance with HDPF Policy 6, 35 and 37, as well as dReg19 Policy 8 and 36.

Parking Provision

7.101 LP Policy 41 and dReg Policy 25 state that adequate parking facilities must be provided within developments to meet the needs of anticipated users, with consideration given to the needs of cycle parking, motorcyclists as well as electric vehicle charging points (EVC). dReg19 Policy 25 also states the need for development to incorporate safe and secure cycle storage facilities and sets a minimum requirement for the installation of infrastructure within residential developments for potential EVCs in the future.

7.102 The West Sussex Guidance on Parking at New Developments (WSGPND) (2020) document sets out car and cycle parking requirements for new residential development. The guidance indicates that the site falls within Parking Behaviour Zone 5, requiring the lowest level of parking provision across the site. This comprises 0.9 spaces per 1 bed; 1.1 spaces per 2 bed; 1.7 spaces per 3 bed; and 2.2 spaces per 4 bed dwelling.

7.103 The WSGPND also states the requirement for 'Active' charging points for electric vehicles to be provided at a minimum of 20% of all parking spaces, with ducting provided at all remaining spaces where appropriate to allow for these spaces to be upgraded in the future.

- 7.104 When considering cycle parking requirements, the guidance requires flats (1 and 2 beds up to 3 rooms) to provide 0.5 spaces per unit in communal storage; flats (4+ rooms) to provide 1 space in communal storage; houses (1 and 2 beds up to 4 rooms) to provide 1 space; and houses (3+ beds and 5+ rooms) to provide 2 spaces.
- 7.105 In total, the development proposal provides 252 parking spaces, which exceeds the WSGPND requirements. Of the 252 parking spaces, 77 of these are to be located in the basement under the main heritage building. The provision includes a combination of allocated and unallocated spaces, of which more than 50% will be unallocated meaning that visitor parking across the site is encapsulated within the total.
- 7.106 There are 2 no. car club spaces proposed for the eastern portion of development of the former Novartis site, and residents of this site would also be able to benefit from the car club.
- 7.107 Each of the 10 M4(3) units will benefit from an allocated space, with an additional 2 M4(3) unallocated parking spaces.
- 7.108 EV charging is to be provided across the site in the form of both active and passive capabilities, ensuring that the site will meet Building Regulation requirements.
- 7.109 Cycle parking is also proposed across the site, exceeding West Sussex standards, with a total of 220 cycle parking spaces proposed, far exceeding WSCC cycle parking standards.
- 7.110 As such, it is considered that the development proposal is compliant with LP Policy 40 and dReg 19 Strategic Policies 24 and 25, as well as the guidance contained within the WSGPND.

Transport and Sustainable Transport

- 7.111 The planning application is supported by a comprehensive Transport Assessment. This demonstrates that the access to the site can be safely provided and that the highways network can accommodate the volume of traffic that would be generated by the development. Importantly, up to date traffic surveys have been undertaken to ensure that these conclusions are informed by how the nearby level crossing operates (in terms of wait times when the barriers are down).
- 7.112 HDPF Policy 40 and dReg19 Policy 24 focus on sustainable transport and states that development will be supported if it is of an appropriate scale to the existing transport infrastructure, maintains and improves the existing transport system and provides safe and suitable access for all vehicles, pedestrians and cyclists. dReg19 Policy 24 also requires a Transport Assessment and potentially a Travel Plan to support any new development that is likely to impact on the local road network.
- 7.113 The West Sussex Walking and Cycling Strategy (2016) identifies that walking and cycling are low-cost modes of travel that have the potential to replace a significant proportion of motorised journeys. The objectives identified within this strategy that are of particular relevance are:
- *To ensure that cycling and walking are recognised as important travel modes and therefore part of the transport mix.*
 - *To make cycling and walking the natural choice for shorter journeys (such as journeys to school), or as part of a longer journey; and*
 - *To reduce congestion and pollution by encouraging and enabling people to travel without a car.*
- 7.114 The West Sussex Active Travel Strategy (2024) builds upon the West Sussex Walking and Cycling Strategy. The Active Travel Strategy sets four key aims, which are:

1. Support the decarbonisation of the transport network.
2. Reduce the need to travel by motorised vehicles.
3. Boost physical and mental health and wellbeing across the country.
4. Support future economic prosperity and vibrant local communities.

7.115 The strategy also requires residential developments that meet the criteria to produce a Transport Assessment, to achieve (or improve upon) a maximum 12-hour weekday vehicle trip rate and must be monitored in accordance with the TRIRCS UK Standard Methodology for Travel Plans.

7.116 A Transport Assessment has been prepared by Paul Basham Associates in support of this Planning Application.

7.117 As identified in Table 1 from the Assessment, the site is well located in relation to a range of existing facilities and amenities within Horsham and the surrounding area. The information provided within Table 1 of the Assessment can be seen below:

Figure 7.117.1 Local Amenities and Facilities

Amenity	Distance from Site Access (Metres)	Walking Time (80m per minute)	Cycle Time (250m per minute)
Bus Stops (Blenheim Road')	85m	1 mins	<1 min
Café	700m	9 mins	3 mins
Place of Worship	600m	8 mins	2 mins
Convenience Store (Tesco Express)	1.1km	14 mins	4 mins
Supermarket (Lidl)	1.1m	14 mins	4 mins
North Heath Community Primary School	700m	9 mins	3 mins
Pub/ Restaurant	1.3km	16 mins	5 mins
Post Office	1.5km	19 mins	6 mins
Bicycle Shop	1.2km	15 mins	5 mins
Day Lewis Pharmacy	700m	9 mins	3 mins
Horsham Community Hospital	650m	8 mins	3 mins
Gym	1.3km	16 mins	5 mins
The Hollbrook Club (community centre)	800m	10 mins	3 mins
Railway Station (Horsham)	1.2km	15 mins	5 mins

(Transport Assessment – Table 1, Paul Basham Associates, December 2024)

7.118 The Chartered Institution of Highways and Transportation's (CIHT) 'Planning for Walking' (April 2015) report notes that the average pedestrian journey length is 1.37 km, and many local amenities in proximity to the site are within this range. This presents an opportunity to promote walking and other sustainable travel options, thus reducing reliance on

motorised vehicles. The Manual for Streets and CIHT also define a 'Walkable Neighbourhood' as one where key facilities are accessible within a 10-minute walk (800m), and therefore, the location of the site in relation to its nearby facilities meets the description of a 'Walkable Neighbourhood', and represents excellent opportunities to encourage the use of sustainable transport modes.

7.119 Once pedestrians have left the site, there is an existing signalised crossing locating 18m west of the sites pedestrian access point, which will provide safe crossing movements for future residents and users of the site.

7.120 The gentle topography and wide carriageways in the vicinity of the site make the area attractive for cycling, particularly considering the cycling distance from the site to many local amenities. Parsonage Road is already a designated cycle route and includes advisory on carriageway cycle lanes that are around 1m wide. To the east of Parsonage Road, this cycle route also extends along Kings Parade. North Parade (the western end of Wimblehurst Road) is also a designated cycle route into the town centre. This further supports cycling as a main form of transport to and from the site.

7.121 Cycling is encouraged throughout the development, proposing in total 220 cycle parking spaces across the development.

7.122 When considering public transport, the nearest bus stops are approximately 85m west from the site on North Heath Lane, which are served by 4no. bus routes, as detailed below.

Figure 7.122.1 Bus services from Blenheim Road bus stops (Paul Basham Associates)

Service	Operator	Route	Approximate Frequency		
			Monday - Friday	Saturday	Sunday
61	Metrobus	North Heath – Horsham	Once an hour 10:14-16:55	Once an hour 10:14-17:14	No service
71	Metrobus	Mowbray, Bohunt School – Horsham Bus Station	Every 30-60 mins 06:22-19:00	Once an hour 07:22-1759	No service
89*	Compass Travel	Horsham – Haywards Heath	Once a day at 07:43	No service	
200	Metrobus	Horsham – Gatwick Airport	Every 30-60mins 00:09-23:15	Every 30-60 mins 00:09-23:15	Once an hour 00:09-23:15

7.123 The journey time from Blenheim Road to Horsham Bus Station is approximately 20 minutes, which is a starting/ending point for routes 61, 71 and 200. From Horsham Bus Station, there are multiple other bus services that operate to locations across West Sussex.

7.124 Horsham Train Station is located around 1.2km south of the site, which as seen above, is highly accessible by both pedestrians and cyclists. Horsham Train Station is served by Southern and Thameslink Railway services, which offer direct trains to a number of locations including London Victoria, Portsmouth Harbour, East Croydon, Chichester, Gatwick Airport and Crawley.

7.125 There are 253 cycle parking spaces at the train station, in the form of racks and stands, further promoting cycling as a main form of transport to and from the site.

7.126 It is therefore concluded that the site's location in relation to pedestrian, cycle and public transport represents an excellent opportunity to encourage the use of sustainable transport for residents and visitors, in accordance with HDPF Policy 40 and dReg19 Policy 24.

Refuse, Waste and Recycling

7.127 HDPF Policy 33 states the importance of incorporating appropriate areas for refuse and recycling storage, whilst dReg 19 Policy 20 seeks to ensure that development proposals allow sufficient space for both general waste and recycling provision both internally and externally. The waste storage facilities must also be convenient, safe and visually attractive.

7.128 A Waste Management Plan has been prepared by Paul Basham Associates in support of this planning application. The report highlights that the provision of waste storage should be presented in the layout of all new developments, demonstrating adequate space for both internal and external bins.

7.129 All houses that are proposed on the site will be provided with either sufficient space to the rear of the properties, or adjacent to the properties entrance. There are three types of refuse storage that will be utilised for the houses, to be located against the properties wall of fence line.

7.130 Each house will be provided with three bins. Dwellings for between 1 – 5 persons will be provided with a 140 litre refuse bin, and dwellings for 6 or more persons will be provided with a larger 240 litre refuse bin. All dwellings will also be provided with a 240 litre recycling bin and a 240 litre garden waste bin.

7.131 For the flats, refuse stores are to be provided within the building footprint, within close proximity to the entrance. The storage facilities will be discretely located and sensitively designed to ensure that they do not cause disturbance to the residents from odour, noise and visual unattractiveness.

7.132 The flats are required to have access to refuse bins and recycling bins. Garden bins are not deemed necessary for occupiers of the flats. It is required that each flat has access to 180 litres of refuse bin space, and 240 litres of recycling bin space. Each block of flats within the proposed development satisfactorily meets these requirements.

7.133 When considering access to the refuse stores, while the internal carriageways of the site are anticipated to remain private, however, where appropriate, the scheme has been designed to ensure carriageways can accommodate a 26t refuse vehicle, as per the LPAs requirements.

7.134 Refuse servicing for all properties within the development will take place internally within the site, and refuse vehicles will be able to get within 25m of all storage locations. In no event will refuse vehicles be required to reverse further than 12m to access storage locations, in line with the Manual for Streets paragraphs 6.8.8 and 6.8.9.

7.135 As such, it is considered that the development proposals accord with HDPF Policy 33 and dReg 19 Policy 20, as internal and external storage facilities are satisfactorily provided in terms of both quantity and quality.

8. Conclusions

- 8.1 This planning application relates to the provision of 206 much needed new homes in Horsham. The development will at least meet the Council's policy requirements in terms of affordable housing provision.
- 8.2 The site was formally used for employment, and a 2020 consent for a mixed employment and residential development will now not be implemented. That is because, and as has been demonstrated in detail through this application, an employment (or 'employment generating' use) is not needed and is not viable at the site. It is therefore appropriate to consider alternative uses for this site.
- 8.3 This is a highly sustainable, previously developed site that should come forward for new homes. The scheme that is advanced is of a high-quality, with innovative architecture and good quality, varied landscaping and open space provision.
- 8.4 The scheme would meet the requirements of the Development Plan, and so it should be granted consent as soon as possible

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