



Horsham
District
Council

Horsham District Local Plan Examination

Matters, Issues and Questions

Matter 6e: HA9: Henfield: site HNF3 only

September 2026

Contents

HA9: Henfield: site HNF3 only 3

 i. Highways access arrangements and whether contributions to offsite works are justified..... 3

 ii. How a scheme would be designed to take account of: 4

 ii.1 Links to the High Street and the relationship to neighbouring sites with planning permission..... 4

 ii.2 Landscape, trees and ancient woodland..... 4

 ii.3 Heritage assets..... 5

 ii.4 The sewage works..... 5

 ii.5 Flood risk..... 6

Further Proposed Modifications..... 7

HA9: Henfield: site HNF3 only

1. For simplification, Strategic Policy HA9: Henfield: site HNF3 is referred to as “the policy” in this hearing statement. The allocation policy has been introduced at Main Modifications stage as MM233. The proposed allocation is for 450 homes to the East of Henfield outside the settlement boundary.

i. Highways access arrangements and whether contributions to offsite works are justified

2. In common with many other non-strategic allocations, the policy does not stipulate highways access which is considered to be a matter of detail. The Council's assessment has been that safe access can be achieved. It is expected that the primary highway access will be off the A281 via a new roundabout to the north of the existing settlement boundary, with provision made for cyclists and pedestrians to traverse the roundabout. Access is also anticipated off Charlwood Drive with its design taking into account the need to accommodate and not compromise the Neighbourhood Plan allocation at Land at Wantley Estate, which HNF3 wraps around on three sides.
3. Whilst HNF3 does not include a criterion seeking contributions for off-site works, this will likely be sought through applying Strategic Policy 23: Infrastructure Provision as well as relevant national policies. It is noted that WSCC and Henfield Parish Council suggest a number of measures to which contributions should be directed. It is likely contributions will be sought via Section 278 or Section 106 to secure a new access roundabout, safe active travel links / improvements within Henfield, for east to west improvements across the A281 for access to the school and leisure centre etc, and potentially bus stop / bus infrastructure improvements near the site. These are detailed matters to be considered and secured at planning application stage, and which are largely considered to be suitably covered by HNF3.g, Strategic Policy 23, Strategic Policy 24 (Sustainable Transport) and Strategic Policy 19 (Development Principles) as modified.
4. In response to representations, it is however suggested a modification be made to ensure the policy makes clear the importance of, and need for, a link across the A281 to enable safe access from the site to the school and leisure facilities etc. It is therefore proposed that this is reflected in an amendment to MM233 (in examination document **MMJB01**) so that criterion HNF3.g be modified to read as follows, which is also presented at the end of this statement for ease of reference (amendments reflect the ultimate change to the submitted local plan policy, the further suggested amendment proposed is shown in italics) “Provide for active travel linkages to and through the site to and from Henfield High Street and across the A281 (east to west) to provide safe access to key community facilities, including the school”.
5. The evidence to date is that the Community Infrastructure Levy (CIL) and Section 278 agreements are likely to be the appropriate mechanism for addressing the transport measures raised by West Sussex County Council (**Main Modification Comment ID /1566**). It is noted that the latest Infrastructure Delivery Plan (IDP), June 2026 (examination document ref: **HDCJB19**) currently indicates, on pages 135 and 137, that funding for A272/A281 roundabouts sustainable measures in Cowfold to enhance public transport and active travel facilities could be via S106. This information was given by WSCC as local highway authority. Notwithstanding advice from WSCC, when considering developer funding options, it would need to be demonstrated that the CIL Regulation 122(2) is complied with when considering impacts on road junctions in Cowfold (which is around 7 km from the development site). Whilst CIL is not currently specified in the relevant IDP entry, this would not preclude it as a funding source, enabling WSCC to bid for funds from the CIL pot for sustainable measures in Cowfold. The IDP is subject to regular review and updates so the identified funding source can be picked up at the next review as appropriate.

6. It is acknowledged Henfield Parish Council raise a number of transport issues (**Main Modification Comment ID /750**) that they feel need addressing that are not explicitly addressed in the IDP (**HDCJB19**). In view that there is a made Henfield Neighbourhood Plan the Parish Council will receive 25% of any CIL monies obtained from development in the Parish and it therefore has an ability to fund projects that it considers to be important. In respect of ongoing flooding occurrences at Mockbridge on the A281, this is fully recognised as a local concern but is not considered to be a site specific issue.
7. For the reasons above and for consistency with other non-strategic allocations it is not considered additional criteria such as those requested respectively by WSCC and Henfield Parish Council, other than the amendment detailed above regarding active travel links across the A281, are appropriate for inclusion under HNF3 or the other Henfield allocations.

ii. How a scheme would be designed to take account of:

ii.1 Links to the High Street and the relationship to neighbouring sites with planning permission

8. Criteria HNF3b and g of the Policy help to ensure proposals give appropriate regard to active travel links through the site and to Henfield High Street, and do not prejudice the delivery of adjacent allocations to the west (Neighbourhood Plan allocation Policy 2.2 Land east of Wantley Hill for 25 dwellings, sports area and open space) and south of the site (HNF2: Land North of Furners Lane for 191 homes). In addition to these, the topic specific policies would also apply, such as Strategic Policy 19: Development Principles (as modified), Strategic Policy 23: Infrastructure Provision, Strategic Policy 24: Sustainable Transport and Policy 28: Community Facilities, Leisure and Recreation when a planning application is being considered. This includes the provision of appropriate buffers within the allocation site that may be necessary to ensure adjacent allocations are not prejudiced. It is therefore considered suitable links to the High Street and appropriate relationships with neighbouring sites with planning permission can be secured.
9. As raised in response to question “i” above, Henfield Parish Council receive 25% of any CIL monies obtained from development in the Parish. The Parish Council will therefore be able to provide funding for projects that they consider to be important.

ii.2 Landscape, trees and ancient woodland

10. Analysis of impacts is set out in the **Site Assessment Report Part C (HDCJB14c)**. This was informed by the Council's **Landscape Capacity Assessment (EN08)**. The site is located within Local Landscape Character Area (LLCA) 69: Land North of Henfield in the revised Horsham District Landscape Capacity Assessment, 2021. The identified sensitivities in terms of trees and ancient woodland include the landscape value attributed to the trees adjacent to the River Adur which runs through the site. The two most eastern fields and land extending north of the existing village boundary are considered to be sensitive to development. Criteria HNF3a and e of the Policy, to be read with relevant topic specific policies in the Local Plan, help to ensure such sensitivities are appropriately considered and addressed at application stage. This includes appropriate regard to be given to the site's location within the Local Nature Recovery Strategy and within the setting of the South Downs National Park.
11. The land area also has a network of hedgerows and small areas of woodland/shaws that provide important landscape delineation and connectivity. There are a number of veteran trees within the site. The existence of veteran trees within hedgerows and adjacent to the site will require confirmation/clarification and appropriate design considerations, including buffers, as part of any planning application.
12. To comply with the policy criteria for HNF3, appropriate safeguards and buffers will need to be designed into any residential or other development to protect the Ancient Woodland which lies outside

the allocation to the south of the eastern corner. The lateral shaw running west – east in the southeastern sector of the site contains a number of veteran trees and is a remnant Ancient Woodland (less than 0.25 hectares in size) that has not currently been included within the provisional Ancient Woodland inventory available to the public view. Appropriate safeguards and buffers will therefore be required to be designed into any future development.

13. There are no trees subject to Tree Preservation Orders currently within the site, but this may change as the importance of the trees on site are reviewed.
14. It is noted the promoters of the site, Taylor Wimpey UK Ltd, seek the following amendment to criterion HNF3.e which relates to trees and woodland and their buffers (Rep ID: 839).

“e. All areas of ancient woodland and any veteran trees shall be retained and protected to ensure no loss or deterioration of irreplaceable habitat, unless there are wholly exceptional reasons and a suitable compensation strategy exists. A minimum seminatural buffer of at least 15 metres, measured from the ancient woodland edge, shall be provided unless otherwise agreed. Reference should be made to Natural England’s Standing Advice.”

15. The Council acknowledge regard to Natural England’s Standing Advice will be necessary, as well as all other relevant material considerations including written ministerial statements. This does not have to be made explicit in policy. The importance of the veteran trees/band of Ancient Woodland, which form irreplaceable habitats, is highlighted in policy N6 of the NPPF 2026 and will be material to any application. The Council consider the criterion in the policy, as set out in MM233, to be proportionate in the context of national policy and relevant standing advice.

ii.3 Heritage assets

16. Analysis of impacts is set out in the **Site Assessment Report Part C (HDCJB14c)**. It is the Council’s view that there is potential for less than substantial harm to the setting of Chestham Park Lodge and that this harm, and any harm to Wantley Manor, can be mitigated. To comply with the policy, the site should be assessed for non-designated and unrecorded heritage assets before construction takes place and consideration should be given to how above ground archaeology and standing buildings can be reused or incorporated into any development to reinforce a sense of place and perception of change through time. This would include historic field boundaries. Criteria HNF3d of the policy, to be read with relevant topic specific policies in the Local Plan, should ensure these heritage assets are appropriately considered and addressed at application stage.
17. The Council recognises that the potential public benefit from a site of 450 homes (including affordable) coming forward will be significant in determining any application. Whilst the ultimate judgement against Policy HE6 of the NPPF 2026 will be made in determining the planning application, there is strong and reasonable prospect that, with mitigation factored in, impacts on heritage assets do not present a ‘showstopper’ to development.

ii.4 The sewage works

18. Criterion HNF3c of the Policy helps to ensure appropriate regard is given to the sewage works. The Henfield Sewerage Treatment Works (STW) is located in close proximity to the northern portion of the site. To ensure the site is suitable for residential development any development on this site would need to be supported by a robust noise impact assessment undertaken by a suitably competent noise consultant who are members of the ANC and are accredited to the Institute of Acoustics (IOA).
19. As highlighted in Southern Water’s representation to the policy (**Main Modification Comment ID /380**), a robust odour impact assessment would also be required to be undertaken by a suitably competent consultant. The Council understands that the odour assessment should be undertaken in accordance with current technical guidance, in particular the Institute of Air Quality Management

(IAQM): Guidance on the assessment of odour for planning and ensure that any modelling is based on the industry standard for odour of 0.6 parts per billion (ppb) of hydrogen sulphide with a 98-percentile probability. The Council consider this issue and requirement for an odour impact assessment is suitably addressed within HNF3.c and topic specific policies, such as, Strategic Policy 11 and Strategic Policy 12.

20. The promoter has indicated river restoration works would be undertaken, and a riverside walk could be provided. Any proposed routes through the site can be considered at application stage to ensure that any future upgrades of the wastewater treatment works are not prejudiced and public amenity is appropriately protected taking into account technical guidance such as that from IAQM. The Council also considers that any required infrastructure capacity upgrades can be assessed at application stage and achieved through suitable conditions attached to any planning permission, to ensure development phasing corresponds to these upgrades, as required by Strategic Policy 23 on infrastructure provision.

ii.5 Flood risk

21. As recorded in the **Site Assessment Report (HDCJB14c)**, a significant part of the periphery of the Site is within Flood Zone 2 and 3; however, all residential development is proposed within Flood Zone 1. The scheme being promoted includes a buffer between the river and any built development as advised in the Environment Agency's response (**Main Modification Comment ID /793**) to the suggested modification MM233. Criterion HNF3.f, Strategic Policy 6, Strategic Policy 10, and relevant national policy ensure that flood risk is considered and, where appropriate, mitigation is included in any planning permission.
22. Nevertheless, under prevailing national policy at the time of submission, a Sequential Test and Exceptions Test have been undertaken in relation to the site allocations. These were updated in June 2026 to incorporate the main modifications – see the **Flood Risk Sequential and Exception Tests (HDCJB17)**. The Land East of Henfield (HNF3) is one of five proposed site allocations found through the sequential test to not be sequentially preferred when compared with alternatives, therefore requiring further assessment via an exceptions test as set out in paragraph 169 of NPPF (Sept 2023). The outcome of this is set out in **Appendix 3 of HDCJB17**. In summary it found the site's sustainability outweighed the flood risk, particularly given that the areas of the site in Flood Zones 2 and 3 could be excluded from development, subject to measures to ensure the development will be safe over its lifetime including a surface water drainage strategy. In line with Strategic Policy 10 and the updated NPPF (2026), a site-specific flood risk assessment must be submitted in support of any planning application.
23. There are two surface water flow corridors associated with existing ditches that drain land to the south of the site and into areas of the site itself. Development will need to be excluded from these flow routes, or if access routes are needed - culverts should be sized taking account of flood flows to prevent an increase in flood risk on or off site. Smaller localised areas of ponding should be managed as part of the surface water drainage strategy.
24. The Flood Map for HNF3 within **Appendix 3 of HDCJB17** indicates that the Flood Zone 2 and 3 extends up to the A281. The Council considered the proposed access roundabout to the north of the site off the A281 can be designed so that it lies outside the flood extent. The second point of access in the south of the development is unaffected by fluvial flooding.

Further Proposed Modifications

25. The Council has read all representations received on this policy, including that from Henfield Parish Council e.g. **comment ID /750**. The Council does consider it necessary to make further modifications to the policy to clarify that active travel linkages should be provided across the A281 to enable future occupants safe access to the community facilities which lie to the west of the A281/High Street.

Paragraph/ Policy Number	Suggested Change	Reason
HA9	Amend Criterion HNF3.g (as originally modified by MM233) to read: <u>Provide for active travel linkages to and through the site to and from Henfield High Street and across the A281 (east to west) to provide safe access to key community facilities, including the school.</u>	To ensure appropriate active travel links to key community facilities are provided.