



Horsham District Local Plan 2023–2040

Main Modification MM233 – Site HNF3, Land East of London Road, Henfield

Matter 6e, 21 October 2026

1. Introduction and CPRH's position

1.1 CPRH objects to the proposed allocation of HNF3 for 450 dwellings. The allocation would impose an unacceptable cumulative burden on Henfield, which already has approximately 600 homes permitted or allocated but not yet built out. The addition of HNF3 would bring the total to approximately 1,050 units of committed and proposed development.

1.2 The consequences extend well beyond the boundaries of HNF3. They include pressure on highways, education, healthcare, wastewater infrastructure and flood management, together with substantial changes to the landscape, settlement character and historic village centre.

1.3 CPRH considers that the Council has not adequately demonstrated that the cumulative effects of this scale of growth can be satisfactorily accommodated. HNF3 should therefore not be allocated.

1.4 If the Inspector is nevertheless minded to retain HNF3, CPRH considers that an integrated assessment of the cumulative effects on Henfield must precede confirmation of the allocation. This must establish the infrastructure and mitigation required, demonstrate their feasibility and deliverability, and identify how their provision will be secured.

1.5 These are questions about the suitability of HNF3 for allocation in the context of Henfield's existing commitments and constraints, not simply matters of detailed design that can be deferred to a future planning application. CPRH has approached this statement from the perspective of plan-making: we do not seek to determine the detailed merits of a future planning application.

2. The scale and distribution of growth in Henfield

2.1 Much of the proposed development is concentrated around the north-east of Henfield. HNF3 adjoins the permitted HNF2 development of 191 homes and the Land East of Wantley Hill Estate, which is allocated for 25 houses under the Henfield Neighbourhood Plan. It also lies just across the A281 London Road from Land at Parsonage Farm, which was brought forward by the Neighbourhood Plan and now has

outline permission for 235 houses. Together, these developments would create a substantial extension of the settlement (MMJB03a, Policies Map Pack 1, p.15).

2.2 The Sustainability Appraisal acknowledges concern about a piecemeal high-growth strategy for Henfield (SA Addendum, paragraph 2.2.19). Nevertheless, the proposed allocation is justified partly by Henfield's position as a second-tier settlement in the southern part of Horsham District.

2.3 Henfield's location does not, of itself, demonstrate that it can accommodate the proposed scale of growth. The village has no railway station, limited bus services and no dual-carriageway connection. Its principal north-south route passes through the historic High Street, while flooding constrains the road network to the north and south.

2.4 The settlement hierarchy is a useful starting point for determining where development should go, but a settlement's position in that hierarchy does not establish how much additional growth it can accommodate. Henfield's designation as a second-tier settlement must therefore be considered alongside its existing commitments, infrastructure capacity, accessibility and environmental constraints.

2.5 The proposed scale of development needs to be assessed as a whole against the capacity and constraints of Henfield, rather than treating the individual sites as separate opportunities for housing delivery.

2.6 CPRH considers that the cumulative scale of growth proposed for Henfield has not been justified by an adequate assessment of the village's capacity to accommodate it. HNF3 should therefore not be allocated.

3. Highways, access and sustainable transport

3.1 Taylor Wimpey's proposals for HNF3 envisage a new roundabout on the A281 London Road and a southern access to Charlwood Drive, directing development traffic through the existing Wantley Hill residential estate.

3.2 Taylor Wimpey has suggested that the Land East of Wantley Hill Estate could use the same access point on Charlwood Drive rather than constructing another access nearby. However, access at a similar location on Charlwood Drive has already been approved under outline planning permission as the sole vehicular access to the HNF2 site.

3.3 These developments are at sufficiently early stages of implementation for Horsham to investigate coordinated access arrangements. A connection between HNF2 and HNF3 could provide direct access to the proposed London Road roundabout for all three sites, potentially removing the need for development traffic to pass through the existing residential estate. The Charlwood Drive access could then offer a more attractive walking and cycling route towards the village centre to encourage active travel.

3.4 The proposed roundabout, near the northern entrance to Henfield, also provides an opportunity to investigate coordinated access to development on the western side of London Road. Land North of Parsonage Farm has outline permission under DC/21/2013, with an access junction on the A281 south of the brow of Wantley Hill. The adjoining, unallocated site SA894 has been promoted with a separate access further north, beyond the brow.

3.5 A western arm of the proposed HNF3 roundabout could potentially serve both sites, avoiding separate junctions on this section of London Road. This would require investigation of highway design, funding and the implications for the existing permission amongst other issues. It is an opportunity for coordinated longer-term planning, not in itself a justification for allocating HNF3 and becomes relevant only if the Inspector is minded to retain the allocation.

3.6 The cumulative transport consequences extend well beyond the proposed roundabout. The Council must demonstrate that the wider road network can accommodate the combined effects of approximately 1,050 permitted, allocated or proposed homes in Henfield, including HNF3. Any further growth proposed in future would add to the importance of planning infrastructure coherently.

3.7 Henfield has no railway station and limited public transport. Many journeys from the new developments will therefore depend on private vehicles and the road network. The suitability of HNF3 must be considered in that wider context, not solely by reference to its site access.

3.8 Northbound journeys towards Horsham use the A281, which is vulnerable to flooding and closure at Mock Bridge. The junction at Cowfold is another constraint. The Council should demonstrate how the combined traffic from Henfield's development would affect these routes, including during disruption.

3.9 Southbound journeys must pass through Henfield's historic High Street, where congestion, parking and pedestrian conditions already present difficulties, as discussed in Section 7. The A2037 south of Henfield is also vulnerable to flooding and closure at Woods Mill. These constraints are relevant both to everyday journeys and to the resilience of the wider network.

3.10 CPRH is concerned that the cumulative transport effects have not been shown to be acceptable and therefore HNF3 should not be allocated.

3.11 The opportunities for coordinated access identified above do not, in themselves, justify the allocation. If the Inspector is nevertheless minded to retain HNF3, the Council should demonstrate, through an integrated assessment of the adjoining developments and wider road network, that the cumulative traffic effects can be satisfactorily addressed. This should establish what access arrangements and

infrastructure are necessary, whether they are feasible, what off-site works and proportionate contributions are required, and how their funding and delivery would be secured before the allocation is confirmed.

4. Education, healthcare and community infrastructure

4.1 The proposed growth would place substantial additional demands on Henfield's existing community infrastructure. The Council must demonstrate that the combined requirements of committed development and HNF3 can be accommodated.

4.2 The Sustainability Appraisal states that there are no known capacity issues at St Peter's Primary School. However, this does not establish that sufficient places will be available when the committed developments and HNF3 are occupied.

4.3 The school has already been expanded using part of its playground, and opportunities for further expansion appear limited. It was oversubscribed only a few years ago, when some children living in Wantley Hill Estate were unable to obtain places and had to attend schools elsewhere.

4.4 Taylor Wimpey's earlier education assessment also identified the potential need for additional school capacity. Although that assessment is dated, it reinforces the need for an updated assessment of cumulative demand.

4.5 The Council should obtain evidence from the relevant education authorities and the school concerning projected pupil numbers, available capacity and the feasibility of any necessary expansion or alternative provision.

4.6 Similar concerns arise in relation to healthcare. The presence of a GP surgery does not establish that it has sufficient capacity to accommodate the additional population. Existing residents report difficulties obtaining appointments, and no objective assessment of the capacity for expansion has been demonstrated in the evidence examined by CPRH.

4.7 HNF1 is proposed as an extra-care retirement facility comprising 72 units and 10 specialist-care units. Although it is unlikely to generate significant demand for school places, it will create additional demand for healthcare and other services.

4.8 Before HNF3 is allocated, the Council should demonstrate that the cumulative requirements for education, healthcare and other essential community infrastructure can be accommodated, with any necessary improvements identified and their delivery secured.

5. Landscape and settlement character

5.1 The proposed allocation would contribute to a substantial expansion of Henfield into the countryside to the north and east, alongside HNF2 and Land East of Wantley.

5.2 The Sustainability Appraisal acknowledges concern about the piecemeal high-growth strategy for Henfield. It also records that a previously considered large extension would have very significant adverse effects on settlement character and form (SA Addendum, paragraphs 2.2.19 and 2.3.43).

5.3 Taylor Wimpey's March 2020 Landscape and Visual Overview acknowledges that Horsham's Landscape Capacity Assessment identifies low-moderate capacity for medium-scale housing and no/low capacity for large-scale housing in the landscape character area covering land north and north-east of Henfield.

5.4 Although HNF3 is allocated for 450 homes, Taylor Wimpey continues to promote approximately 500 homes. Together with HNF2, the proposed allocation would form part of a substantially larger extension of Henfield.

5.5 The developer's landscape assessment recognises the sensitivity of the northern approach to Henfield and the increasingly rural character of the land further east. Its conclusions about visual containment and the potential for screening do not resolve the cumulative effects of the combined development on the character and setting of the settlement.

5.6 The ability to screen individual housing parcels does not necessarily establish that the resulting expansion of Henfield is acceptable in landscape terms.

5.7 HNF3 is crossed by public footpaths connecting Henfield to a wider network of countryside trails to the east. These routes are valued by residents and visiting walkers. Even if the paths are retained, replacing open farmland with housing would substantially change the character and experience of this part of the network.

5.8 Taylor Wimpey's Preliminary Ecological Appraisal dates from March 2020 and identifies woodland, hedgerows, marshy grassland and habitats potentially supporting farmland birds and reptiles, and recommends further species surveys. The ecological baseline therefore requires updating before reliance is placed on it in assessing the effects of development.

5.9 The Sustainability Appraisal identifies much of HNF3 as having very high potential within the emerging Local Nature Recovery Network, particularly along the Cutlers Brook (Chess Brook) (SA Addendum, paragraph 2.3.35). The Council should demonstrate how the cumulative development, drainage and recreational proposals would protect and enhance this ecological network. This assessment should extend beyond the site boundary where necessary, including consideration of whether changes to flood storage, levels or flows could affect downstream habitats. Defra's MAGIC mapping identifies areas of Priority Habitat floodplain downstream of HNF3 along the Adur valley.

5.10 CPRH considers that the cumulative scale of development would cause unacceptable harm to Henfield's landscape setting and settlement character. HNF3 should not be allocated.

5.11 If the Inspector is nevertheless minded to retain HNF3, Horsham should first undertake an integrated landscape assessment of the combined development around north-east Henfield, obtain updated ecological evidence, establish the extent of the resulting harm and demonstrate that any necessary mitigation is feasible and deliverable.

6. Flooding, drainage and wastewater

6.1 The northern part of HNF3 lies within the floodplain of Chess Brook, also referred to as Cutlers Brook in recent Horsham planning documents. Updated flood mapping identifies substantially greater flood exposure than the earlier assessment.

6.2 CPRH's August representation records that the proportion of HNF3 within Flood Zone 3 increased from 4.1% in the September 2024 assessment to 13.8% in June 2026. The area exposed to surface-water flooding in the 1-in-100-year event increased from 5.9% to 18.5%.

6.3 A historical flood event identified as HENFIELD 1981, recorded 9.5 metres from the site in Horsham's September 2024 database, no longer appears in the June 2026 entry. The Council should explain how this evidence has been accounted for.

6.4 The revised mapping raises questions about whether HNF3 can accommodate 450 homes alongside the necessary flood storage, drainage infrastructure, ecological enhancement and proposed riverside park. These functions need to be assessed together rather than as separate design matters.

6.5 The cumulative effects of HNF2 and HNF3 on the Chess Brook catchment also require assessment. HNF2's Flood Risk Assessment identifies an ordinary watercourse along its eastern boundary flowing north into Chess Brook. Its drainage strategy proposes an attenuation basin providing 4,156 m³ of storage, with a controlled discharge of 15.1 litres per second into the existing watercourse.

6.6 Although that strategy addresses HNF2 individually, it does not establish the combined effects of HNF2 and HNF3 on the receiving catchment. The Council should demonstrate that the proposed drainage arrangements can operate satisfactorily during prolonged rainfall and high water levels without increasing flood risk elsewhere or causing adverse effects on downstream floodplain habitats.

6.7 Wastewater capacity presents a further concern. Southern Water has confirmed that the existing sewerage network can accommodate HNF2's proposed foul flow at its identified connection point. However, Horsham's June 2026 Infrastructure Delivery Plan identifies wastewater network reinforcement for HNF3 as critical infrastructure.

Capacity at HNF2's connection point does not establish capacity for the combined developments.

6.8 Southern Water announced a £1.4 million improvement scheme at Henfield Wastewater Treatment Works in September 2024, intended to increase treatment capacity and storm-water storage. CPRH has been unable to establish whether the scheme was completed or what additional capacity it has provided. Monitoring records confirm that storm-overflow discharges to Chess Brook continued during 2026, including on 21 August following heavy rainfall. These discharges do not establish that the improvement scheme was unsuccessful, but reinforce the need to assess the works' capacity and performance under wet-weather conditions.

6.9 Before HNF3 is allocated, the Council should obtain an integrated assessment of the cumulative wastewater requirements of committed development and HNF3. This should establish the capacity of the treatment works and sewerage network, identify any necessary reinforcement and demonstrate its feasibility, funding and delivery. Opportunities for coordinating infrastructure serving HNF2 and HNF3 should also be investigated.

6.10 The assessment must demonstrate that the proposed riverside corridor can accommodate its flood-management, drainage, wastewater, ecological and recreational functions. If the cumulative flood risk cannot be satisfactorily addressed, or the necessary infrastructure cannot be provided, HNF3 should not be allocated.

7. Heritage and Henfield Conservation Area

7.1 HNF3 is close to two Grade II listed buildings. Their settings have been recognised in the developer's proposals, and detailed design and mitigation can be addressed through the planning application process, provided that the allocation is acceptable in principle.

7.2 CPRH's principal heritage concern is the cumulative effect of additional development on Henfield Conservation Area, particularly the High Street. The High Street contains numerous historic and listed buildings and is central to Henfield's character and identity. It is the principal shopping centre and also the through route towards the south coast.

7.3 Traffic congestion and parking already create difficulties for residents and visitors. The Henfield Community Partnership's 2026 *Our High Street, Our Future* report, based on 580 survey responses, identifies parking, congestion and illegal parking as significant concerns. Residents identified obstruction and pedestrian safety problems, particularly around One Stop and nearby junctions, while visitors described traffic and parking as a significant deterrent to visiting the High Street.

7.4 Residents reported undertaking an average of 37% of their shopping locally. The report identifies considerable potential to increase local spending, but also recognises that wanting particular businesses and supporting them sufficiently to remain commercially viable are not necessarily the same thing. It cannot therefore be assumed that 450 additional homes would translate directly into a corresponding increase in High Street trade. Journeys from HNF3 towards the south coast would, however, necessarily pass through the historic centre.

7.5 The cumulative consequences for traffic, parking, pedestrian movement and the character and functioning of the Conservation Area need to be established. A highway assessment showing that additional traffic can be accommodated would not, of itself, demonstrate that the consequences for the historic environment are acceptable.

7.6 Before HNF3 is allocated, the Council should assess the cumulative effects of Henfield's proposed growth on the High Street, including its heritage significance, pedestrian accessibility, traffic and parking, and commercial vitality. The assessment should identify any necessary mitigation and establish its feasibility, funding and delivery. If the cumulative harm cannot be satisfactorily addressed, HNF3 should not be allocated.

8. Conclusions and changes sought

8.1 CPRH considers that the proposed allocation of HNF3 would impose an unacceptable cumulative burden on Henfield. The Council has not adequately demonstrated that the combined effects of approximately 1,050 permitted, allocated and proposed homes can be satisfactorily accommodated.

8.2 The concerns extend beyond HNF3's boundaries. The overall scale of growth has impacts on highways and community infrastructure, landscape and settlement character, flooding and wastewater, and the historic village centre. Considering each development or infrastructure issue separately does not establish whether the combined growth is acceptable.

8.3 CPRH therefore requests that MM233 be amended to remove the proposed HNF3 allocation.

8.4 If the Inspector is nevertheless minded to retain HNF3, CPRH requests that the Council first undertake an integrated assessment of the cumulative effects on Henfield. Before the allocation is confirmed, this must establish what infrastructure and mitigation are necessary, demonstrate that they are feasible and deliverable, and identify how their funding and coordinated provision will be secured. If the cumulative impacts cannot be satisfactorily addressed, HNF3 should not be allocated. These fundamental questions cannot be deferred to a future planning application.