



**Horsham
District
Council**

Representation Form

Rudgwick Neighbourhood Development Plan 2020-2031

The Neighbourhood Planning (General) Regulations 2012 (as amended) - Regulation 16

Rudgwick Parish Council has prepared a Neighbourhood Development Plan (NDP). The Plan sets out a vision for the future of the parish and planning policies which will be used to determine planning applications locally. In accordance with Regulation 16 of the Neighbourhood Planning Regulations 2012 (as amended), the plan and associated documents will go out to consultation on 2nd October 2020 for 7 weeks inviting representations on the draft submission plan, basic conditions statement and consultation statement.

Copies of the Rudgwick Neighbourhood Plan and supporting documents are available to view on the Horsham District Council's website:

<https://www.horsham.gov.uk/planningpolicy/planning-policy/currentconsultations>

Documents will not be made available in deposit locations due to the current COVID-19 pandemic. If local residents have difficulty in engaging online we have provided a telephone number and email address below. This will be on a message service where members of the public are encouraged to leave their details for an officer to contact them back if they need further information.

Email: neighbourhood.planning@horsham.gov.uk or SAS@southdowns.gov.uk

Telephone: 01403 215398

All comments must be received by midnight on 20th November 2020

There are a number of ways to make your comments:

1. Please use the above web address above to view the documents; and
2. Complete this form and email it to: neighbourhood.planning@horsham.gov.uk ; or
3. Print this form and post it to: Neighbourhood Planning Officer, Horsham Council, Parkside, Chart Way, North Street, Horsham, RH12 1RL

All comments will be publicly available, and identifiable by name and (where applicable) organisation. Please note that any other personal information provided will be processed by Horsham District Council in line the Data Protection Act 1998 and General Data Protection Regulations. Horsham District Council will process your details in relation to this preparation of this document only. For further information please see the Council's privacy policy: <https://www.horsham.gov.uk/privacy-policy>

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B, identifying which paragraph your comment relates to by completing the appropriate box.

PART A	Your Details
Full Name	[REDACTED]
Address	[REDACTED]
Postcode	[REDACTED]
Telephone	[REDACTED]
Email	[REDACTED]
Organisation (if applicable)	
Position (if applicable)	Wants to Self Build,
Date	20/11/20

PART B

To which part in the plan does your representation relate?

Paragraph Number:	5.Residential development pg 15	Policy Reference:	RNP2.2 Housing mix and 5.5 graph
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Do you support, oppose, or wish to comment on this plan? (Please tick one answer)

Support Support with modifications ? Oppose X Have Comments X

Please give details of your reasons for support/opposition, or make other comments here:

NB * Please see next page below as I could not get the form to adjust the space.

I wish to make representations primarily regarding RNP2.2 policy in RNP reg(16) which was not in existence during Rudgwick Neighbourhood Pan (reg 14 stage) and therefore this is the first time, I am able to comment with my views on this policy, (which I feel, has significantly changed, in RNP planning policy terms as it is materially different from the residential housing policy within the RNP reg 14 consultation).

I wasn't aware of these changes, until following advice I checked to see if there had been any amendments made to the RNP reg 14 (since its closure), by looking at RNP(reg 16).

I then had to compare and search through the two RNPs, as I could not access any amendments directly.

As a family we wish to self-build one 3 bedroomed dwelling within the built up area of Rudgwick and originally RNP reg 14 seemed to support our need to do this, whilst also siting previous local demand/need for 3 bedroomed dwellings, (sourced from data from the 'Housing matters' RNP consultation document), so we were happy with that.

NB *HOWEVER, it now seems that due to these recent amendments in the RNP reg 16 e.g Namely

RNP2.2 there is a different scenario at play, one that I believe, conflicts with the NPPF and stated aim of the 'right to build legislation,' thereby inhibiting the diversification of housing supply and unjustly affecting the 'Self Builder' and 'Smaller Builder', rather than revitalising them.'

RNP2.2 in effect, feels like it favours the larger builder /developer who wouldn't have to climb through the same specific hoops/hurdles with this policy. However the Self Builder or Smaller Builder, would have to try and navigate/interpret, the wording 'exceptionally and only if', depending on the size and characteristics for the site'.

Where is the policy guidance/data for needing the above wording specifically, because as yet, I haven't been able to locate any (apart from ref. to the graph in 5.5, confirming the size of market size dwelling that should be provided in accordance with RNP2.).

This policy is therefore not clear cut, lacks clarity, is too rigid, is inflexible and could breed uncertainty and confusion and therefore should be DELETED. It could also be open, to different interpretations and thereby create an unequal playing field, with numerous potential appeals and unnecessary delays, plus an increased and unnecessary workload for planning officers, (when they are already stretched).

Why should this restrictive policy in place, where you can only Self build, if it fulfils the 'exceptionally' and 'only if' scenario within this context. In addition why should Self Builders and the Smaller Builder have to prove viability of the scheme in the context of RNP2.2 and be subject to the size of a home and site constraints that does not necessarily fulfil their needs.

Our situation is that we saved up to buy our land from my parents locally at a low price, within the built up area of Rudgwick. This land was cheaper because it didn't have planning permission on it, and so the opportunity of Self Building is a way of us getting on the housing ladder to accommodate our family's needs, whilst being able to build a house using the latest environmental friendly technology e.g air source heat pump rather than Gas.

HOWEVER would we now as a family be told that we could only build a one or two bedroomed dwelling instead, with this policy in place, (see 5.5 graph) re. RNP2.2 because we don't fulfil the viability criteria, or site constraints (even though we require a three bedroomed dwelling for our family needs)?

Another example to illustrate my point about this policy, would be that if an existing home owner within Rudgwick has a five bedroomed property with subsidence or one that is dilapidated and wants to build a new environmentally friendly house, on one plot. Will they be told they can only 'Self Build' a one or two bedroomed dwelling to replace the four bedroomed one? And would this potential application, once again have to jump through the hoops of 'exceptionally' and 'only if', in relation to the wording of the policy? Why should this be the case, when larger sites do not have to go through this unfair policy and red tape.

What about, if a family wants to downsize to a smaller three bedroom property wanting to build another house within their garden, with disabled facilities that are more appropriate for their needs, will they be prevented in doing so because it would be seen again, as only one market unit?

Therefore the policy RNP2.2 has not been thought through, to my mind, as there are so many potential ramifications and therefore it should be deleted. Whilst I understand why smaller dwellings need to be incorporated into the housing mix within larger development sites, why does this have to be at the expense of the 'Self Builder' or the Smaller Builder who could face possible constraints regarding this policy?

Please also see attached supporting letter from MP Ricard Bacon who champions Self Build, custom and community House building and Place Making to support my comments.

Please also see below relevant NPPF policy paragraph 11. In the context of my comments regarding the above policy RNP2.2 which I believe conflicts with the NPPF with, namely:

'The presumption in favour of sustainable development which for PLAN-MAKING means that a) plans should positively seek opportunities to meet the development needs of the area and be sufficiently flexible to adapt to rapid change'.

It goes on to say in 11 b)ii 'any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole'.

'For DECISION -TAKING this means C) Approving development proposals that accord with an up-to-date development plan without delay D)ii any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole.'

On a separate policy issue within RNP reg 16, namely RNP3 Homes for older people RNP3.1 this also seems very inflexible and rigid and would mean that a person owning a bungalow wouldn't have the same national planning rights within the NPPF as another house owner, particularly in terms of potentially improving their property in a way that suits their needs. This also therefore conflicts with NPPF 11.

Could bungalow owners be stopped from extending upwards to gain extra space, (which could be more practical in terms of saving valuable garden space) by putting one room in the roof to accommodate a study or an extra bedroom to accommodate a carer?

Could this extension, then make the bungalow, 'a chalet bungalow' and therefore, not be allowed to be extended in this way by this policy? Or would this be acceptable within this planning policy?

There is not much detail regarding this policy to accommodate this potential scenario or cater for any other scenario.

This policy needs to therefore be more flexible as people's needs change and sometimes people may have to accommodate extended family within their property and might not have enough land, to extend on the ground floor, particularly because of the COVID crisis, where some extended family members may find themselves homeless and have to move in with other family members who live in bungalows and therefore build an extra room in the roof.

RNP 11.1 Telecommunications Needs to add the word 'health' in relation to potential health risks of 5G.

What improvements or modifications would you suggest?

Regarding policy RNP2.2 and 5.5 graph I would recommend deleting this Policy.

You could then keep the Housing Mix RNP2.1 BUT only in relation to MAJOR DEVELOPMENT HOUSING in accordance with 'Major Sites 'only.

This keeps things far simpler and provides maximum choice for different scenarios and the opportunity for housing diversity and is more flexible in terms of accommodating family needs and providing more certainty, choice and flexibility for the Self Builder and Smaller Builder (who need to be revitalised).

The above modifications I would be more willing to therefore support.

Regarding RNP3.1 the definition of bungalows should at least be widened to include chalet bungalows for more potential owner flexibility, in terms of accommodating their needs.

(Continue on separate sheet if necessary)

If you have additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/ addressed or attached.

Do you wish to be notified of the local planning authority's decision under Regulation 19 of the Neighbourhood Plan (General) Regulations 2012 in relation to the Rudgwick Neighbourhood Development plan?

Please tick here if you wish to be to be notified: