

David Buckley  
Chairman to Rudgwick Parish Council  
Rudgwick Village Hall  
Bucks Green  
Rudgwick  
West Sussex RH12 3JJ

Our ref:  
Your ref: RNP/HDC/Nov

Date: 18 November 2020

By Email.

Dear Mr Buckley

**Re: Representations to Rudgwick Neighbourhood Plan Submission (Regulation 16)**

Thank you for consulting Horsham District Council (HDC) on the Submission (Regulation 16) Rudgwick Neighbourhood Development Plan (RNDP).

HDC is supportive of the Parish Council's work to develop their NDP. We recognise that the Parish Council has undertaken a significant amount of work to reach this point and should be commended for all their hard work. The Council's detailed comments on particular policies are listed in the schedule attached to this letter.

We appreciate that the Rudgwick Neighbourhood Planning group has been flexible whilst preparing a plan through the Covid-19 pandemic and acceptance to running a longer consultation period for Regulation 16 (7 weeks).

In addition, we wish to make the following general comments to the Submission Rudgwick Neighbourhood Plan as part of our response:

1. Rudgwick is identified as a Medium Village in the settlement hierarchy as set out in Policy 3 of the adopted Horsham District Planning Framework (HDPF). There is an expectation that emerging neighbourhood plans are required to accommodate their fair proportion of the minimum 1,500 dwellings to be delivered from Neighbourhood Plans across Horsham in accordance with Policy 15 (4) of the HDPF.
2. Horsham District Council and the Parish Council agreed in September 2019 that Horsham District Council would allocate sites as appropriate to meet local housing needs through the local plan review process. As a result, this plan does not seek to allocate land for new residential development. There is an opportunity for a full or partial review of the Rudgwick Neighbourhood Plan once the Horsham Local Plan Review has been through the legislative process and is suitably mature to provide the certainty for local groups to embark on a review of individual plans. We will continue to keep all of our community groups and neighbourhood plans informed of the Local Plan Review's progress.

HDC made representations to the previous Pre-Submission (Reg 14) version of the Plan in July 2020 and the Council is pleased to see that many of these comments have been considered and taken on board where appropriate to ensure general conformity with planning legislation.

If you have any further questions regarding this representation, please do not hesitate to contact me.

Yours sincerely,



Senior Neighbourhood Planning Officer

Horsham District Council Reg. 16 Comments to the Pre- Submission  
Rudgwick Neighbourhood Development Plan (RNDP)

**November 2020**

New words to be inserted are underlined. Words to be deleted will be ~~crossed through~~.

RNDP Paragraph No. / Policy No.	Suggested Change / Comment
<b>General point</b>	Please make sure there is a consistent approach throughout the document to a/the Neighbourhood Development Plan. There are examples where it is called a Neighbourhood Plan.
<b>Front page</b>	It is not clear from the front page that this is the Submission (Reg 16) version of the RNDP. It is recommended that this title is provided on the front page. It is also recommended that the time span of the NP is included on the front page (not just the end year of the plan).
<b>Page 4 subtitle</b>	Proposed amendment:  The purpose of a Neighbourhood <u>Development</u> Plan.
<b>Paragraph 1.6</b>	Proposed amendment:  a neighbourhood <u>development</u> plan.
<b>Paragraph 2.10</b>	Please clarify that the population number relates to the parish.
<b>Paragraph 2.10</b>	Proposed amendment:  The largest age group in Rudgwick <del>was</del> <u>is</u> 45-65; at 33.3% this is higher than the Horsham proportion (29.1%) and substantially higher than the figure for England (25.4%).
<b>Chapter 3 Vision</b>	The vision is considered lengthy and it is suggested just one paragraph under each of the subheadings would be appropriate if the vision is set out in this format.:
<b>Paragraph 3.2</b>	The vision includes two bullet points on housing. The second refers to creating appropriate homes for first-time occupiers. Whilst it is understood what is meant by the vision – the RNDP does not allocate sites for housing and it could be misconstrued that the NDP does plan to create/bring forward/allocate new housing. For this reason, we recommend that this part of the vision is deleted/removed. It is not necessary to include it in the vision if there are no housing allocations within the RNDP.  Alternatively, we suggest that the vision is simplified to refer to supporting a varied mix of housing types, tenures and sizes within the parish.
<b>Paragraph 3.2</b>	The vision includes a section on education that cannot easily be addressed within the RNDP. A suggestion is that a community aim could be included within the NDP that sets out actions/proposals which will assist in addressing this part of the vision.
<b>Paragraph 3.2</b>	Proposed amendment to the vision with regard to Community Facilities:  There are adequate community facilities for all ages and our existing facilities ( <del>such as the King George V playing field, Rudgwick Hall and Jubilee Hall</del> ) are well maintained and used extensively.
<b>Paragraph 3.2</b>	The vision includes a section on reducing traffic through the narrow roads. This may not be easily addressed within the RNDP. A suggestion is that a community aim could be included within the NDP that sets out actions/proposals which will assist in addressing this part of the vision.

<b>Page 14 – footnote 1</b>	Proposed amendment:  ....Framework and this will be replaced by the Horsham District Local Plan once prepared <u>adopted</u> .
<b>Paragraph 4.1 onwards</b>	Description of the 6 settlements – please make it clear within each paragraph on the separate settlements, if they have a defined built up area as set out in the Development Plan – it is assumed that only Rudgwick village and Bucks Green have a built up area boundary. There is no specific reference as to how the reader can identify which settlements have built up areas in order to easily understand part RNP1.1 within Policy RNP1.
<b>Policy RNP1</b>	The intention of Policy RNP1 is clear, as the parish council seek to manage development across the RNDP area. However, RNP1.1 is not necessary; any development would be expected to be in accordance with the policies contained in the Development Plan. This does not need to be stated in policy which is considered to be restrictive and prescriptive.
<b>Policy RNP1</b>	Proposed amendment:  RNP1.2 All development, regardless of its location or whether it is <u>an</u> allocated <u>site</u> for development <u>or not</u> , should be designed to:
<b>Policy RNP1</b>	RNP1.2a) The individual settlements should be shown clearly on the policy map. The supporting text refers to the separate settlements and the policy refers to the built up areas as defined in the development plan. However, a number of the settlements do not have a built up areas and therefore the limits of each are not clear to the reader. This is important if the policy seeks to prevent settlement coalescence.
<b>Policy RNP1</b>	Section RNP1.2 b) refers to a settlement's individual identity. Whilst paragraphs 4.1 – 4.6 provides some information of the character of each, this is not detailed or extensive enough to allow the reader or prospective developer/applicant to understand how to comply with the provisions of the policy. This part of the policy refers to design matters rather than it being part of a spatial strategy. It is recommended that RNP1.2b) is deleted.
<b>Paragraphs 5.1/5.2</b>	Reference should be made to the Local Plan Review. This paragraph should also make clear the parishes intention to defer the allocation of land for development to Horsham District Council as per the Parish Councils correspondence of 16 September 2019.
<b>Paragraph 5.2</b>	Proposed amendment:  As discussed in Section 1 of this document, <del>this</del> <u>the RNDP plan</u> does not make any allocations for new residential development.
<b>Policy RNP2 Housing Mix</b>	The wording and information contained within the policy is overly complicated and unclear especially the provisions of RNP 2.2. With regard to the information within RNP2.1 the mix of house sizes appears to differ to that within the Reg 14 version of the RNDP. It is recommended that further information is provided within the supporting text as to what may be defined as 'compelling reasons to deviate' from the policy requirements. It is unclear as to why there is a need for RNP2.2 which was not provided within the Reg 14 RNDP. Any housing mix stipulated should be supported by explicit and clear evidence.  The policy should also make clear how 1 or 2 bedroom houses are to remain as such. Residential extensions to an existing house can easily take these properties outside of the mix so they become 3 or 4 bedroom houses.  It is also recommended that Policy RNP2 makes reference to Policy RNP3 and RNP4 so that these policies are read together.
<b>Paragraph 5.6 onwards</b>	The paragraphs relating to affordable homes include a wide range of terminology that some readers may find confusing. These include:  Affordable Rental

	<p>Shared Ownership Social/Affordable Rented Intermediate/Shared Ownership Rented Affordable Housing Intermediate Affordable (Shared Ownership) Affordable Rented tenure Affordable home ownership</p> <p>Policy RNP3 refers to Affordable Home Ownership tenure.</p> <p>These phrases and statements are unclear, confusing and whilst the term Affordable Housing is set out within the glossary with a link to the NPPF – there is not enough explanation within the relevant paragraphs and the policy to set out what they mean and what the policy is trying to achieve. Our suggestion is that these are all included within the glossary and further information/links to the relevant parts of the NPPF.</p>
<b>Policy RNP3 Affordable Housing</b>	<p>It is not clear what the policy is trying to achieve; although this may be caused by the confusion surrounding the various terminology used to describe the forms of affordable housing. The supporting text states (in paragraph 5.9) that the steering group seeks to rectify the shortfall in provision of intermediate affordable housing. Yet the policy makes no mention of intermediate affordable housing (in RNP3.2). This states that a minimum of 10% of all homes on such sites must be provided with Affordable Home Ownership tenure in line with national policy. If this is the case, then it is a national policy position and therefore not a local requirement and there is no need for a policy within the RNDP. RNP3.1 refers to local plan policy and therefore there is no need for a RNDP policy as this matter is covered by the District Local Plan.</p> <p>RNP3.3 requires more information to understand what the local need is so that applicants/developers are clear about the policy requirements.</p>
<b>Paragraphs 5.11 onwards – Homes for older people</b>	<p>It is assumed that providing homes for older people is more desirable in locations where there are facilities nearby as opposed to being isolated in some of the smaller settlements. Rudgwick has a medical centre and a wider range of facilities. It may be appropriate that Policy RNP4 refers to locational preferences rather than a policy relevant to all of the Parish.</p>
<b>Policy RNP4 Homes for older people</b>	<p>A number of our comments made in July 2020 on the Reg 14 version of the RNDP have not been taken on board and remain valid.</p> <p>Wording within the policy should include phrases such as ‘where possible’ rather than the word ‘must’ – this is to ensure there is some flexibility within the policy to take into account local circumstances.</p> <p>RNP4.3 states that major developments must provide at least 15% of all new homes as bungalows or open market sheltered/retirement housing, or a combination of the two. There is no justification for this percentage within the supporting text.</p> <p>RNP4.4 refers to M4 (2) of the Building Regulations. This is an optional standard and there is no supporting evidence as to why this is included within the policy or how it can be implemented.</p> <p>RNP4.4 contains an ‘asterisk’ symbol after M4(2)* - assume this is a typographical error.</p>
<b>Housing Policies RNP2,3 &amp;4</b>	<p>Taken together, the housing policies set out a number of policy parameters that applicants/developers (especially of major schemes) will need to take into account. Please ensure that these have been considered in terms of impact on development viability and that, combined, they do not impose undue restrictions on sites coming forward for development.</p>
<b>RNP5 Housing Density</b>	<p>It is unclear why this policy is required. Furthermore, the comments made in July 2020 in response to the Reg 14 RNP are still relevant – including:</p>

	<p><i>The justification to the policy doesn't state why Rudgwick can accept higher densities – is that across all of the village centre? Even within the Conservation Area? What about brownfield sites where higher densities may be required due to abnormal costs? Unclear what 'densities which exceed the existing situation' means, this requires revision to provide a clear and unambiguous guidance to the reader.</i></p> <p>RNP5.2b states that reference should be made to Policy RNP2. Reference should also be made to Policy RNP4 as providing bungalows within a housing scheme may impact on the density of the overall development due to them requiring more development land. It is assumed that bungalows (or any housing built for older people) should be located within settlement centres where there is easy access to a range of facilities.</p> <p>Notwithstanding the above comment – support given to providing bungalows within housing development needs to ensure this is an appropriate type of development across the parish and is not in conflict with other policies within the RNDP and Local Plan. Examples include supporting bungalows in areas of conservation or in close proximity to listed buildings or in areas of high density. Consideration also needs to be given as to whether developing sites with bungalows represents the best/most effective use of land.</p>
<b>Paragraph 6.3</b>	It is should be made clear in this paragraph if any of the RNDP policies provide different advice to that within the Parish Design Guide/SPD and the reason for this. It should also be made clear that once the RDNP is 'made' it will take precedence over the SPD; NDP policies will supersede the information contained within the SPD.
<b>Paragraph 6.5</b>	<p>Proposed amendment (to spelling of Rudgwick):</p> <p>New buildings should be of a high quality to protect and enhance the distinctive character of Rudgwick.</p>
<b>Policy RNP6 Materials</b>	Please explain within the supporting text why the policy states at RNP6.2 that full or partial timber-framing in buildings should be used sparingly. This point was raised in our response (July 2020) to the Reg 14 version of the RNDP.
<b>Paragraph 6.6</b>	<p>Proposed amendment:</p> <p>We are keen to ensure that new buildings are not a modern replicas of the existing building stock.</p>
<b>Paragraph 6.7</b>	<p>The paragraph makes the following statement:</p> <p>As in all villages, Rudgwick has acquired its share of buildings which are poorly designed...</p> <p>Does this refer to the parish of Rudgwick or the village?</p>
<b>RNP7 Architectural Style</b>	As above – does this policy refer to the parish or the village of Rudgwick?
<b>Paragraph 6.10</b>	<p>Proposed amendment:</p> <p>Parish'es built environment...</p>
<b>Policy RNP8 Development Height</b>	<p>Whilst it is understood what the policy is trying to achieve with regard to the height of buildings – it remains a clumsily written policy and difficult to follow exactly what it means for the applicant/developer. Paragraph 6.11 states that the intention is to limit new development to two storeys across the parish. RNP8.1 says that new development can be more than two storeys if it replaces a structure that was more than two storeys. RNP8.2 makes no mention of two storeys. RNP8.3 makes no mention of two storeys. As it stands, the policy is prescriptive, conflicting and not positively written.</p> <p>In order to have a policy that is straightforward and easy to understand it may be more appropriate to say:</p>

	<i>'Building heights will generally be limited to two storeys, with the following exceptions....'</i>
<b>Paragraph 6.12 onwards - Street scene</b>	<p>The policy appears to be trying to improve or encourage too many elements of 'the street scene' – effectively trying to 'micro-manage' many aspects across the parish. It would be difficult to interpret as an applicant/developer and not easily deliverable through the planning application system particularly because it doesn't allow for flexibility in interpretation.</p> <p>The supporting paragraphs to Policy RNP9 do not provide enough detail and evidence illustrating the requirement for the policy. As recommended in our comments at Reg 14 stage (July 2020) photographs will be useful to identify the existing characteristics of the street scene and the type of example the policy wishes to support. Photographs may also assist in identifying examples of poor street scene.</p>
<b>Policy RNP9 Street Scene</b>	<p>The matter regarding street scene is so wide and varied across the parish that it means the policy is trying to address many different types including fencing, hedges, paving, driveways etc. It is considered that this policy is too wide ranging for the NDP and open to interpretation as it is unable to pin down all of the required street scene recommendations across the parish.</p> <p>RNP9.2 refers to all paths, vehicular routes and parking areas. Are these off-road locations? Does it include footpaths that are in public ownership? What are vehicular routes? What falls within this category?</p> <p>RNP9.2c) refers to integrating soft landscaping to soften the appearance of the area, including tree planting where in-keeping. What does 'in-keeping' mean?</p> <p>RNP9.3 states that all development across the parish should avoid open-plan frontages. Does this include retail and commercial development?</p> <p>The policy direction provided in RNP9.5 stating that 'proposals incorporating the provision of new / improved vehicular or pedestrian access' should take care to ensure that these are not over-elaborate or out of scale' is considered to be ambiguous and provides no clear direction for applicants and developers.</p> <p>Matters regarding lighting and floodlighting (RNP9.6) are not substantiated through background evidence within the supporting text.</p> <p>Proposed amendment:</p> <p>RNP9.1 New buildings should be placed to form a consistent building lines along streets.</p>
<b>Policy RNP10 Local Economy</b>	<p>RNP10.3 states that proposals which would facilitate working from home or start-up businesses will be supported so long as they do not result an unacceptable impact on the amenity of adjoining properties and character of the area is not adversely affected.</p> <p>Supporting evidence regarding the impacts of working at home on local areas has not been provided within the accompanying text. This needs to provide examples as to what 'unacceptable impact' means.</p>
<b>Policy RNP12 Accessibility</b>	<p>The policy states that all major residential development within or adjacent to the Built Up Area Boundary of Rudgwick or Bucks Green must demonstrate that future occupiers can feasibly and safely access Important Local Facilities. There are 10 facilities listed in the policy. Does each and every development have to demonstrate the requirement of the policy? This is not considered feasible in line with advice set out in the NPPF. To demonstrate that that future occupiers can access all of the facilities? It is not clear how this part of the policy can be delivered. In addition, new development is unable to just provide new routes to existing facilities. These concerns were raised in our comments on the Reg 14 version of the RNDP (July 2020).</p>

<p><b>Policy RNP13 Non-Motorised Routes</b></p>	<p>This policy seeks to deliver new non-motorised routes, or improvement to existing routes.</p> <p>It is our experience that this policy approach is often more appropriate set out as a community aim. This comment was made in our Reg 14 response (July 2020).</p> <p>We recommend that this is removed as a planning policy and included as a community aim.</p> <p>Specific comments on the wording of the policy:</p> <p>RNP13.2 b) - doesn't make sense. Please consider re-wording.</p>
<p><b>Policy RNP14 Sports Facilities</b></p>	<p>Paragraph 8.14 states that the RNDP wishes to not only protect these [sports facilities] for future generations, but to improve our recreation areas.</p> <p>However, Policy RNP14 makes no references to the loss of sports facilities. In line with our comments in July 2020, we recommend that the Policy refers to protecting existing facilities.</p>
<p><b>Policy RNP15 Allotments</b></p>	<p>Please include details requiring the site to be allocated for an allotment to have services provided or to be able to access services – for example water.</p>
<p><b>Policy RNP17 Green Infrastructure and Trees</b></p>	<p>The provisions of RNP17.2 are unclear and not deliverable. As referenced in our July 2020 comments on the Reg 14 version - the statement 'unless unavoidable' requires clarification. Tree loss can be avoided but it is understood that inevitably some will be lost to development. However, this is a matter the LPA would consider with each application as part of its statutory function. In addition, further clarification is required regarding the statement that removed trees 'must be replaced with a greater number of trees that have the potential to be of greater environmental value than those lost'. It is unclear how this will be implemented.</p> <p>The statement 'potential to be of greater environmental value than those lost' is unclear, not deliverable or quantifiable and open to subjective opinion.</p> <p>As mentioned in our Reg 14 reps - off-site replanting of trees is not generally possible on land outside of the applicant's ownership/control. It should be set out clearly how this part of the policy will be achieved.</p>
<p><b>Policies Map</b></p>	<p>Important Local Facilities are also referenced within RNP13 (this policy is not included within the index to the map).</p>