



**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)	Strutt & Parker
Position (if applicable)	Director
Date	18/11/20

PART B

To which part in the plan does your representation relate?

Paragraph Number:	Refer to letter dated 18/11/20.	Policy Reference:	Refer to letter dated 18/11/20.
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Do you support, oppose, or wish to comment on this plan? (Please tick one answer)

Support Support with modifications Oppose Have Comments

Please give details of your reasons for support/opposition, or make other comments here:
Refer to letter dated 18/11/20.

What improvements or modifications would you suggest?

Refer to letter dated 18/11/20.

(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 notified:

Guildford Office

Somerset House
222 High Street
Guildford
Surrey
GU1 3JD
Telephone +44(0) 1483 406590
guildfordplanning@struttandparker.com
struttandparker.com



Neighbourhood Planning Officer
Horsham Council
Parkside
Chart Way
North Street
Horsham
RH12 1RL

BY EMAIL ONLY: neighbourhood.planning@horsham.gov.uk

18 November 2020

Dear Neighbourhood Planning Officer,

Land Near the Junction of Lynwick Street & Guildford Road, Rudgwick

Rudgwick Neighbourhood Plan 2019 - 2031 – Regulation 16 Submission Consultation October 2020 – November 2020

On behalf of our client, Welbeck Strategic Land IV LLP (Welbeck Land), we're pleased to provide comments on the Submission Rudgwick Neighbourhood Plan (RNP). As with our comments on the Regulation 14 consultation document, we hope these will be of assistance in your consideration of the plan.

First, it is evident the Parish Council, and in particular the Neighbourhood Plan Steering Group, have employed considerable energy, thought and time into the preparation of the document. Reflecting their awareness of the distinctive characteristics of the Parish and seeking to ensure future development makes a positive contribution to the community.

With this in mind, we make the following specific comments on the Submission RNP and accompanying evidence documents:

Parish Spatial Strategy: Policy RNP1 – Spatial Strategy

We broadly support the approach taken in part RNP1.1 of the policy. However, we question the need for inclusion of the second sentence. The preceding Regulation 14 wording of Policy RNP1.1 set out development would be supported that is accordance with the development plan. The revised wording offers unnecessary duplication and clarification of matters of accepted principle when reading the development plan as a whole.

We likewise broadly support part RNP1.2 – including the policies supporting text set out in paragraphs 4.1 – 4.7, acknowledging the key characteristics of the Parish's 6 main settlements.

Residential Development: Policy RNP2 – Housing Mix

Paragraph 5.2 sets out the NP does not make any allocations for new residential development. Instead it seeks to guide all residential development during the plan period to ensure it addresses existing deficiencies in the Parish's housing stock.

As set out in our representations to the Regulation 14 NP documents, we understand and support the approach in not seeking to allocate sites – instead taking up the opportunity presented by Horsham



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District Council for strategic site allocations to be identified, assessed and allocated through the review of the current Horsham District Planning Framework (HDPF) plan.

However, we are concerned by the proposed housing mix presented in Policy RNP2 and the evidence base upon which it has been developed. The process leading to the mix has been explained within the updated supporting Housing Matters (September 2020) document. This refers the Steering Group have had regard to: analysis of market housing delivery in the Parish since 2011; comparing this against the target mix identified within the 'Chilmark' Strategic Housing Market Assessment (November 2016); assessing the differences between the two datasets: followed by seeking to arrive at a mix 'correcting' the identified overprovision of larger properties within the remaining *fair share* of new homes allocated/sought under the HDPF to the end of the plan period 2031. Whilst the employed process and intent is admirable it is not consistent with national policy or guidance.

Paragraph 31 of the National Planning Policy Framework (NPPF) requires the preparation and review of all policies (in the Development Plan) should be underpinned by relevant and up-to-date evidence. This should be proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals. As evidenced in the Estate Agent Interview section of the Parish's HNA 2017 report, there isn't market demand for apartments in the Parish (typically the housing type delivering smaller units), and downsizers typically look for 3-bedroom homes to accommodate visiting families. Rudgwick is a relatively rural Parish where it is to be expected there will be a higher proportion of larger housing, given market demand in the area is likely to primarily be from families with children. Moreover, in November 2019 the District Council's published Strategic Housing Market Assessment recommends the following housing mix:

- 1-bed properties: 5%
- 2-bed properties: 30%
- 3-bed properties: 40%
- 4+ bed properties: 25%

This shows a significantly higher demand for 3-4 bedroom units than Policy RNP2.1 and reflects the need to be flexible to changing demand over the lifetime of the Plan. Whilst the 2019 SHMA does not yet comprise evidence underpinning an extant local plan it is highly likely its dataset and recommendations will be similar, if not identical form, to that which will underpin the new Horsham Local Plan. A Plan programmed to achieve adoption by late 2021/early 2022 – well within the plan period of the NP.

We note the Housing Need Matters (September 2020) report now includes reference in paragraph 2.4 that the Chilmark (2016) Market Housing Mix Report aligns with the Parish council's desire to rebalance the market housing stock. Nonetheless the market mix set by Policy RNP2.1 retains considerable dominance to 1 and 2 bedroom homes which is divergent to the evidence of the more recent November 2019 SHMA and the evidenced market preference for new homes in the Parish.

We are also concerned by the apparent omission in the submitted plan's evidence base demonstrating an understanding of the potential impacts of the required mix upon the viability of developments coming forward during the plan period. In accordance with National Planning Practice Guidance, the role for viability assessment is primarily at the plan making stage¹. To ensure policies are deliverable their requirements need to be realistic, defined and deliverable. Policies should be supported by proportionate assessment of viability taking into account all relevant policies and local and national standards. As the mix proposed by the submitted plan has not previously been tested through the HDPF

¹ ID: 10-002-20190509

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plan, its evidence base the NP's new required mix and its implications should be clearly evidenced by the NP.

We consider the conflict between the housing mix advocated by Policy RNP2.1, latest published evidence and the future new local plan and its policies can and should be avoided. We recommend the policy be amended to introduce greater flexibility whilst still supporting the delivery of smaller homes, for example:

'Sites delivering 11 (net) dwellings or more should provide a mix of housing types and sizes, including for market housing a high proportion of 2 and 3 bedroom properties, to accommodate the needs of young families and downsizers.'

This proposed amended wording reflects housing policies in the Storrington, Sullington and Washington Neighbourhood Plan, which was recently 'made' following a successful referendum.

Residential Development: Policy RNP3 – Affordable Housing

We have no objection to the policy *per se*. However, it would be helpful for the policy itself and or its supporting text to provide guidance regarding the *local need* for tenure split and mix. This appears to be omitted, is unclear in the R16 plan document and its supporting evidence base.

Residential Development: Policy RNP4 - Homes for Older People

We fully support the Parish's intention to ensure delivery of suitable new homes. We also broadly support the Parish's aspiration to include a proportion of new homes as bungalows and to require new homes to be built to higher standards, i.e. Requirement M4(2) of the Building Regulations.

Notwithstanding, there are a number of concerns with Policy RNP4, specifically RNP4.3 and RNP4.4.

RNP4.3 states 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.

We encourage the change made from the R14 NP consultation document which required provision of an undefined '*significant proportion*' being replaced by a defined target of '*at least 15% of all new homes*'. Nonetheless, we remain concerned by the apparent omission of robust evidence supporting this threshold.

From our review of the Housing Matters (September 2020) document the justification for 15% has been arrived at based upon the steering group feeling this would be appropriate (paragraph 3.5). Whilst Welbeck have no evidence to argue to the contrary, given the potential impact this requirement may have upon development viability it is important that when setting a new and untested policy requirement the policy should be underpinned by assessment demonstrating that it is realistic, defined and deliverable.

Paragraph 16 of the NPPF confirms, plans are required to contain policies which are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.

In regard to RNP4.4's requirement for all new homes to achieve M4(2)* of the optional requirements in the Building Regulations this requirement goes beyond the policies of the extant HDPF. And likewise the requirements in the emerging local plan review.

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We are aware HDC's Regulation 18 consultation draft local plan document (February 2020) seeks to introduce a requirement for all dwellings on sites of 20 units or more to meet Building Regulations M4(2) requirement for accessible and adaptable housing. Notwithstanding, HDC have clarified the evidence to support this intention has not yet been prepared.

Building to M4(2), and beyond to M4(2)*, has design and cost implications. Should the Parish wish to introduce this requirement on all new homes it is important this is justified by evidence of need and understanding of the viability impacts of introducing this requirement, in accordance with Planning Practice Guidance²

In omission of appropriate evidence to support parts RNP4.3 and RNP4.4 we recommend the policy wording be amended by full deletion of these requirements.

Residential Development: Policy RNP5 - Housing Density

We broadly support the work undertaken to establish Rudgwick's existing development density characteristics. However, as currently drafted the restriction to densities of development from exceeding the existing situation (referred to in paragraph 5.17 of the NP as between 5 - 15 dpha and only occasionally exceeding 20dpha), unless providing a housing mix in accordance with RNP2 or being within Rudgwick's Village Centre, conflicts with national policy contained in the NPPF.

Paragraphs 122 - 123 of the NPPF encourages the efficient use of land, and that *minimum* density standards should be considered in the plan making process. Paragraph 127 of the NPPF states policies and decisions should ensure developments:

*'...are 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);'*

**emphasis added*

A recent audit of design in England, backed by the Campaign to Protect Rural England³ highlights that low density developments were more likely to score 'poor' (averaging 32dph) or 'very poor' (averaging 25dph) against design criteria than higher density developments. With the best schemes averaging 56dph.

Higher net densities allow for schemes which are more walkable and less dominated by roads, minimising wasted space and maximising the provision of usable open space and landscaping. The appropriate density will depend on the specifics of a site and development, and is best determined through the development management process rather than fixed through a detailed Development Plan Policy.

We recommend Policy RNP5 be amended to allow efficient use of land to be achieved and allowing appropriate innovation and change, whilst requiring development to respect and not be detrimental to the character of the Village and its rural setting overall. This will help realise a high standard of design for any future development and align with national policy.

Suggested amendments to the wording for Policy RNP5 would be:

RNP5.1 The density of new housing developments should:

² ID: 56-007-20150327

³ Place Alliance (2020) *A Housing Design Audit for England*
<https://placealliance.org.uk/research/national-housing-audit/>



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- 1) *Be informed by the character, form, and layout of the local area,*
- 2) *Provide an appropriate mix of housing, and*
- 3) *Reflect the importance of making effective use of land.*

RNP5.2 All proposals incorporating new residential units should demonstrate how the scheme reflects the surrounding built density of the relevant settlement.

These suggested policy wordings reflect principles of achieving appropriate density referenced in the NPPF and the Government's National Design Guide.

Residential Development: Policy RNP8 – Development Height

We broadly support the policy's intention. However, as written it is overly prescriptive limiting all development outside of the Village Centre no higher than 2 storeys, unless replacing an existing structure.

Paragraphs 124 – 132 of the NPPF are concerned with achieving well-designed places. Specifically, paragraph 127 outlines a number of considerations that planning policies should require:

- a) Development should function well and add to the overall quality of the area
- b) Development is visually attractive as a result of good architecture, layout and appropriate and effective landscaping
- c) Be sympathetic to local character and history, including surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)
- d) 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
- e) Optimise the potential of the site to accommodate and sustain an appropriate amount of development and support local facilities and transport networks
- f) Create places that are safe, inclusive and accessible and which promote health and well-being.

To afford more flexibility in achieving well-designed places, we would advocate parts RNP8.1 and RNP8.2 be amended similar to:

Development above two storey in height will be permitted where they:

- a) *Provide an appropriate relationship with existing built development in the local area,*
- b) *Are informed by the character and topography of the site, and*
- c) *Help establish a distinct character to the development, including by providing variation in form and establishing focal points.*

We have no objection to part RNP8.3 of the policy as written.

Infrastructure: Policy RNP12 - Accessibility

We support this policy and the reasoning behind it. We would however suggest a minor amendment to the wording, replacing 'must' with 'should' to avoid it being overly prescriptive, i.e.



RICS Regulated by RICS

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All major residential development within the parish must should demonstrate that future occupiers can feasibly and safely access important local facilities without having to utilise motorised transport methods...

Emphasis added to identify amendment only.

Infrastructure: Policy RNP14 – Sports Facilities

Policy RNP14 sets out new and expanded sports facilities will be supported, subject to the impact on the amenity and character of the area, and facilities being economically sustainable. The accompanying supporting text notes the lack of suitable facilities for the netball team in particular, and the desire for a Multi-Use Games Area (MUGA).

Facilities such as sports pitches and allotments make an important contribution to health and wellbeing, and are an essential social resource for the community. We support these policies accordingly.

We hope these comments are helpful and would be happy to discuss further if it would assist. My contact details are [REDACTED]

Yours faithfully,

